



# **City of Tacoma**

## **WASHINGTON**

Federally Funded Transit Program

### **TITLE VI PLAN**

### **Federal Transit Administration**

**Elizabeth Pauli**  
**City Manager**

Updated May 2019

City of Tacoma  
747 Market Street  
Tacoma WA 98402

# Title VI Plan

## Introduction

The City of Tacoma (City) is a Federal Transit Administration sub-recipient to Sound Transit. Sound Transit contracts with the City to fund commuter incentives, employer programs, and other Transit demand management efforts. The City does not directly provide any transit service.

To meet Title VI program requirements, the City will rely upon the analysis and overall program efforts conducted by Sound Transit to meet requirements, e.g. Public Participation Plan, and the Language Assistance Plan.

Since the City does not operate any transit service, this plan only addresses the General Reporting Requirements.

## General Reporting Requirements

### I. Policy Statement, Authorities and Citations

#### A. Policy of Nondiscrimination

The City of Tacoma assures that no person shall on the grounds of race, color or national origin 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 City of Tacoma sponsored program or activity. The City of Tacoma 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 Tacoma distributes Federal funds to another entity, Tacoma will include Title VI language in all written agreements and will monitor for compliance where applicable.

Title VI compliance is a condition for receiving Federal funds. Assurance of compliance, therefore, falls under the proper authority of the City Manager's department pursuant to its budgetary authority and responsibility. The City Manager and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulation (CFR) 200 and 49 CFR 21.

#### B. Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall on the grounds of race, color or national origin 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. The Civil Rights Restoration Act of 1987 broadened

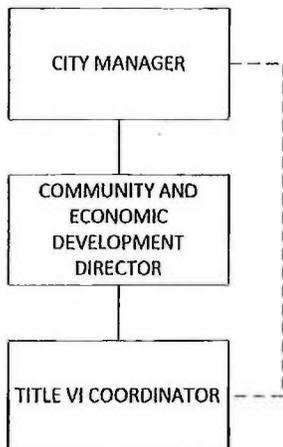
the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

### C. Additional Citations

Title VI of the Civil Rights Act of 1964; 42 USC 2000d to 2000d-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

## II. Organization, Staffing and Structure

### A. Organizational Chart - Reporting Relationships



### B. Staffing and Structure

#### **City Manager**

The City Manager, is authorized to ensure compliance with provisions of Tacoma's policy of non-discrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. The Agency's grants compliance function and Title VI coordination shall be performed under the authority of the City Manager.

#### **Title VI Coordinator**

The City of Tacoma created the position of Community and Economic Development (CED) Title VI Coordinator to perform the duties of the Title VI Coordinator and ensure implementation of the Agency's Title VI Federally Funded Transit Program. If this position is vacant, the CED Business Services/Workforce Development Division Manager will assume responsibility for coordination and implementation of the City's FTA Title VI program.

### **III. Title VI Coordinator's Responsibilities and Program Administration**

As authorized by the City Manager, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring Tacoma's compliance with Title VI requirements as follows:

#### **A. Title VI Coordinator's Responsibilities**

1. Program Administration. Administer the Title VI Program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI Program reviews to assess administrative procedures, staffing, and resources; provide recommendations as required to the City Manager.
2. Complaints. Review written Title VI complaints that may be received by the City of Tacoma following the adopted procedural guidelines (see Appendix 1 - Complaint Procedures). Ensure every effort is made to resolve complaints informally at the local or regional level; and notify Sound Transit of any complaints.
3. Data Collection. Review the statistical data gathering process performed by Title VI Specialists periodically to ensure sufficiency of data for meeting the requirements of Title VI Program administration.
4. Environmental Impact Statements. If applicable, ensure that available census data are included as a part of all Environmental Impact Statements/Assessments (EIS/EIA) conducted by Public Works (PW) and Community Economic Development Department (CED) for projects receiving Federal Transit Administration or other Federal assistance.
5. Training Programs. Conduct or facilitate training programs on Title VI issues and regulations for City of Tacoma employees; and facilitate Title VI training for appropriate staff, contractors and sub-recipients.
6. Title VI Plan Update. Review and update the City of Tacoma Transit Program, Title VI Plan every three years. Present updated plan to the City Manager for approval; submit amended Plan to Sound Transit.
7. Annual Accomplishment Report. Prepare an annual report of Title VI accomplishments and changes to the program in the preceding Federal fiscal year; identify goals and objectives for the upcoming year as required; and submit to Sound Transit by October 31.
8. Public Dissemination. Work with City of Tacoma staff to develop and disseminate Title VI Program information to City of Tacoma employees and sub-recipients, including contractors, subcontractors, consultants, and sub-consultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements, inclusion of Title VI language in contracts or other agreements, website postings, and annual publication of the Agency's Title VI Policy Statement in newspaper(s) having a general circulation, and informational brochures and electronic media on City's webpage. Ensure public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media

reaching the affected community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in languages other than English.

9. Elimination of Discrimination. Work with the Equity & Human Rights Department, Human Services Department, Equal Employment Opportunity Office, and other City of Tacoma offices to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and eliminate discrimination that may be discovered in any City of Tacoma processes.

10. Maintain Legislative and Procedural Information. Federal laws, rules and regulations, Sound Transit guidelines, the current City of Tacoma Title VI Plan, Annual Accomplishment Reports, and other resource information pertaining to the implementation and administration of Tacoma's Title VI Program will be maintained and updated by the Title VI Coordinator. Information will be made available to other City of Tacoma departments or the public as requested or required.

## **B. Program Administration**

### 1. Title VI: Notice to the Public Non-discrimination Policy

The City of Tacoma operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been unlawfully discriminated against for these reasons may file a complaint with the City of Tacoma.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the City of Tacoma. Any such complaint must be in writing and filed with the office of the Customer Support Center within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Those persons needing language assistance can call our language assistance line at: 1-866-874-3972.

For more information on City of Tacoma's Title VI Policy and the procedures to file a complaint contact 253-591-5000; TTY Relay 711; or email [cityoftacoma.org/Tacomafirst](mailto:cityoftacoma.org/Tacomafirst); or mail to Customer Support Center, 747 Market Street, Room 243, Tacoma WA 98402.

A complaint may be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 888-446-4511.

### 2. Title VI Complaint Procedures and Form

A Title VI complaint form and instructions for filling out a Title VI complaint can be obtained from Customer Support Center. A copy of the complaint form is in Appendix 1 along with the instructions for completing the form. For persons with limited English proficiency or unable to access digital media, the Customer Support Center will provide a

hard copy of the complaint form in Korean, Chinese, Spanish, Vietnamese, Tagalog and Russian and Khmer.

For anyone with digital access, a tab at the top of the City's webpage can translate into other languages providing them with access in their native language.

### 3. Title VI Investigations, Complaints, and Lawsuits

The City of Tacoma has had no Title VI complaints related to transit during the past three years. Any complaints received will be shared with Sound Transit.

### 4. Public Participation Plan

The City of Tacoma fully encourages public involvement and participation in decision-making processes. As part of the Sound Transit Title VI work plan for public transit projects, the City adopts the public participation plan of Sound Transit Title VI Program and will coordinate with Sound Transit in public participation efforts related to transit projects being managed by the City of Tacoma.

### 5. Language Assistance Plan

The City relies upon the 4 factor analysis and the language assistance plan conducted by Sound Transit.

### 6. Monitoring Sub-recipients

The City has no sub-recipients. It will cooperate with Sound Transit in providing information and attending meetings as required by Sound Transit in its monitoring procedures of our efforts.

### 7. Review of Facilities Constructed

The City did not build any storage facilities, maintenance facilities or operations centers and did not modify any facilities that require a Title VI analysis.

### 8. Documentation of Governing Body Review and Approval of the Title VI Program

On August 11, 2016, the City of Tacoma signed an agreement between the Central Puget Sound Regional Transit Authority to facilitate sub-recipient funding for the Tacoma Links to Opportunity Program. This Title VI program under the Federal Transit Administration was updated and adopted by the City Manager on May 2019. The documentation of adoption is in Appendix 2.

## APPENDIX 1

### **Title VI: Notice to the Public Non-discrimination Policy**

City of Tacoma operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been unlawfully discriminated against for these reasons may file a complaint with City of Tacoma.

More information on City of Tacoma's Title VI Policy and the procedures to file a complaint may be obtained by:

- emailing [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- mailing to City of Tacoma Customer Support Center, Attn: Carol Wolfe, Title VI Coordinator, 747 Market St. – 2<sup>nd</sup> floor Tacoma, Washington 98402; or
- Visiting our offices located at 747 Market St. – 2<sup>nd</sup> Floor Tacoma, Washington 98402.

Información adicional sobre la Política del Título VI de la Ciudad de Tacoma y el procedimiento para presentar una queja puede ser obtenido:

- Enviando un correo electrónico [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- enviando por correo al Centro de Apoyo del Consumidor de la Ciudad de Tacoma, Atc: Carol Wolfe, Coordinadora del Título VI, 747 Market St. – 2do Piso, Tacoma, Washington 98402;
- Visitando nuestras oficinas localizadas en 747 Market St. – 2do Piso Tacoma, Washington 98402.

Mas marami pang impormasyon tungkol sa Siudad ng Tacoma Title VI Policy at kung paano maghahain ng reklamo ay puwedeng makuha sa pamamagitan ng:

- Pag-email sa [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- Sumulat sa Siudad ng Tacoma Customer Support Center, Attn: Carol Wolfe, Title VI Coordinator, 747 Market St. – 2<sup>nd</sup> floor Tacoma, Washington 98402; or
- Bisitahin ang aming mga opisina na mahahanap sa 747 Market St. – 2<sup>nd</sup> Floor Tacoma, Washington 98402.

关于塔科马市第六章政策和提出投诉程序的更多信息可通过以下途径获得：

- 发送电子邮件 [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- 邮寄信函到塔科马市客户支持中心 Attn: Carol Wolfe, Title VI Coordinator, 747 Market St. – 2<sup>nd</sup> floor Tacoma, Washington 98402; (关照人：卡罗尔·沃尔夫，第六章协调员，747 市场街，2 楼，塔科马市，华盛顿州 98402)
- 访问我们的办公室地址：747 Market St. – 2<sup>nd</sup> Floor Tacoma, Washington 98402. (747 市场街，2 楼，塔科马市，华盛顿州 98402)

## APPENDIX 1

បណ្តឹងរបស់សាលាក្រុងតាកូម៉ា លោកអ្នកនាងអាចទំនាក់ទំនងបានតាមរយៈ:

- អ៊ីម៉ែល [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org)
- ផ្ញើរលិខិតទៅកាន់ មជ្ឈមណ្ឌលគាំទ្រអតិថិជន (City of Tacoma Customer Support Center, ជួនចំពោះ ការ៉ូល វ៉ុល (Carol Wolfe) អ្នកសម្របសម្រួល Title VI ៧៤៧ Market Street, ជាន់ទី២ តាកូម៉ា វ៉ាស៊ូនីនតោន ៩៨៤០២
- មកកាន់ការិយាល័យយើងផ្ទាល់ស្ថិតនៅ ៧៤៧ Market Street ជាន់ទី២ តាកូម៉ា វ៉ាស៊ូនីនតោន ៩៨៤០២

City of Tacoma 的 법률 제 6 항(Title VI)의 정책 및 불만 제기 절차에 대한 자세한 정보는 다음을 통해 얻을 수 있습니다.:

- 이메일: [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- 우편: 타코마 시 고객 응대 부서 (City of Tacoma, Customer Support Center)  
Attention: Carol Wolfe, Title VI Coordinator  
747 Market Street, 2nd Floor, Tacoma, WA 98402
- 사무실을 방문하십시오. 위치는  
747 Market St- 2 층  
Tacoma, Washington 98402.

Thông tin thêm về Chính sách theo Tiêu đề VI của Thành phố Tacoma và các thủ tục để nộp đơn khiếu nại có thể tiếp cận được bằng cách:

- gửi email cho [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- gửi thư đến Trung tâm hỗ trợ khách hàng của Thành phố Tacoma, Người nhận:  
Carol Wolfe, Điều phối viên Tiêu đề VI, 747 Market St. - Tầng 2 Tacoma, Washington 98402; hoặc
- Tham quan các văn phòng của chúng tôi tại 747 Market St. - Tầng 2 Tacoma, Washington 98402.

Дополнительную информацию о политике и процедурах подачи жалобы Артикула VI в муниципалитет города Такома можно получить:

- по электронной почте [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org);
- по почте: City of Tacoma Customer Support Center, Attn: Carol Wolfe, Title VI Coordinator, 747 Market St. – 2<sup>nd</sup> floor Tacoma, Washington 98402; или
- при посещении наших офисов, расположенных по адресу: 747 Market St. – 2<sup>nd</sup> Floor Tacoma, Washington 98402.

## APPENDIX 2



**Tacoma**

### **Title VI Complaint Process and Form**

#### **COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AGAINST THE CITY OF TACOMA, WASHINGTON**

### **City of Tacoma**

### **Title VI Discrimination Complaint Form**

City of Tacoma is responsible for civil rights compliance and monitoring, which includes ensuring that contractors regardless of tier and sub-recipients regardless of tier properly abide by Title VI of the Civil Rights Act of 1964 which is the federal law that protects individuals from discrimination on the basis of race, color or national origin in any program receiving federal assistance, Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In City of Tacoma's complaint investigation process, we analyze the complainant's allegations for possible Title VI violations. If violations are identified, they are investigated as provided in City of Tacoma's Title VI Discrimination Complaint Process.

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	Large Print	Audio Tape
	TDD	Other

<b>Section II:</b>		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered yes to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No



<b>Section IV:</b>
Have you filed this complaint with any of the following agencies? If yes, check all that apply: <input type="checkbox"/> Department of Transportation <input type="checkbox"/> Department of Justice <input type="checkbox"/> Equal Opportunity Commission
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
<b>Section V:</b>
Name (signature) _____ Date: _____

Please mail your completed form to: City of Tacoma, Customer Support Center, Attention: Carol Wolfe, 747 Market Street, 2<sup>nd</sup> Floor, Tacoma, WA 98402, 253-591-5000 or you can email it to [cwolfe@cityoftacoma.org](mailto:cwolfe@cityoftacoma.org).

## APPENDIX 3

### **City of Tacoma Title VI Complaint Process**

Any person who believes he/she has been discriminated against on the basis of race, color, or national origin by City of Tacoma may file a Title VI complaint by contacting the agency. The complainant should complete and submit the Title VI Complaint form linked below to facilitate a speedier investigation. City of Tacoma will investigate all complaints received within 180 days of the alleged incident.

Once the complaint is received by City of Tacoma, it will be reviewed to determine whether the complaint constitutes a Title VI complaint and/or whether there is sufficient information for an investigation. The complainant will receive an acknowledgement letter informing him/her whether the complaint is covered under Title VI.

City of Tacoma will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, City of Tacoma may contact the complainant. Unless a longer period is specified by City of Tacoma, the complainant will have ten (10) days from the date of the letter to send requested information to the City of Tacoma investigator assigned to the case.

If City of Tacoma's investigator is not contacted by the complainant or does not receive the additional information within the required timeline, City of Tacoma may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue his/her case.

City of Tacoma will investigate Title VI complaints for which it has sufficient information. After the investigation is completed, the complainant will be issued one of two letters: a closure letter or a letter of finding. A closure letter summarizes the allegations, states that a Title VI violation could not be established, and informs the complainant that the case will be closed. A letter of finding summarizes the allegations and explains whether any type of corrective action was recommended and/or taken.

A complainant may appeal the decision by submitting a written request to City of Tacoma's Deputy Chief Executive Officer within fifteen (15) business days from the date of the closure letter or letter of finding. The appeal request must specify the basis for the appeal. The Deputy Chief Executive Officer will notify the complainant of the decision either to accept or reject the request for appeal within ten (10) days. In cases where appeal is granted, the Deputy Chief Executive Officer will issue a determination letter to the complainant upon completion of the appeal review.

A person may also file a complaint directly with the U.S. Department of Transportation by contacting the Department at: U.S. Department of Transportation, Federal Transit Administration's Office of Civil Rights: Complaint Team, East Building, 5<sup>th</sup> Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call 1-888-466-4511.

City of Tacoma Contact Information:

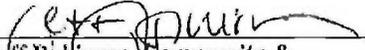
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APPENDIX 4  
Minority Representation Matrix

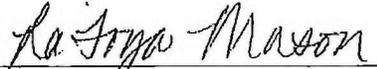
BODY	Caucasian	Latino	African American	Asian	Native American or Alaska Native	Pacific Islander or Native Hawaiian	Other Race	Two or More Races	Vacancy	Total
Hilltop Engagement Committee	7	1	8						0	16
Transportation Commission	8		1						2	9
Planning Commission	7		1		1					9
Human Rights Commission	3	3	6	1	1		1		0	15

Hilltop Engagement Committee (HEC): The HEC was formed by City Council for the expressed purpose of the LINKS to Opportunity Project and is composed of members from throughout the HTLE route for the LINKS to Opportunity project with members appointed by City Council. Representatives include community based stakeholder groups such as the neighborhood business association, neighborhood council and Hilltop Action Coalition. In addition, key community organizations such as Tacoma Community House representing the refugee and non-English speaking populations were included along with Tacoma Housing Authority and several members from the faith based community and residents. The committee reflected the cultural and ethnic diversity of the communities in the Links to Opportunity Project Area. Other more formal boards and commissions listed including the Human Rights Commission, Planning Commission and Transportation Commission have recruitment strategies meant to address City Council Strategic Vision 2025 goals of elected officials and those appointed to boards and commissions represent the diversity of the City and the communities they serve. Recruitment for the Planning, Transportation and Human Rights Commission are done through Social Media, Press Releases, Online Notifications and direct requests for recruitment to formal and informal community groups such as Neighborhood Councils, Business Districts, Centro Latino, Asian Pacific Cultural Center, Black Collective, LatinX groups such as LUSS and Hispanic Chamber of Commerce, Tacoma Refugee Commission and other more informal networks in order to cast as broad of a network as possible

City Approval of Title VI Program

By   
Jeff Robinson, Community &  
Economic Development Director

Date 6/18/19

By   
LaToya Mason, Customer Support  
Center Manager

Date 6/20/19

By   
Elizabeth Pauli, City Manager

Date 6/24/19

