

Grant Transit Authority



TITLE VI POLICY

Effective Date: 08/21/2025



REVISION HISTORY

Changes Made Subsequent to Policy Effective Date

Revised Date	Revision made by	Approved by Resolution #	Description of change With New Effective Date
November 15, 2012	Greg Wright	12-29	Updated language
June 18, 2015	Greg Wright	15-13	Updated language
August 20, 2020	Greg Wright	20-17	Updated language
May 15, 2025	Eric Loomis	25-12	Updated language
August 21, 2026	Eric Loomis	25-26	Updated language

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Title VI POLICY STATEMENT

May 15, 2025

At Grant Transit Authority (GTA), we wholeheartedly commit to fostering an inclusive environment where every individual, regardless of race, color, national origin, or any other protected characteristic, can fully participate in and benefit from our services and programs without fear of discrimination. This commitment is rooted in the principles of Title VI of the Civil Rights Act of 1964, as amended, and extends to the protections of the Americans with Disabilities Act (ADA) of 1990, ensuring no one with a physical or mental disability faces barriers to our transportation services.

Our mission is to weave the values of fairness and accessibility into the fabric of everything we do. We strive to ensure that our leadership, staff, contractors, local partners, and the communities we serve are not only informed about but deeply engaged with the responsibilities outlined in Title VI and the Federal Transit Administration (FTA) Circular 4702.1B of 2012. GTA's Title VI policy serves as a guide, providing clear direction to uphold compliance with Title VI and Limited English Proficiency principles. We are dedicated to thoughtfully considering the social impacts on our communities and prioritizing fairness in every step of our transportation planning and decision-making processes.

A handwritten signature in blue ink that reads "Eric Loomis".

Eric Loomis
General Manager
Grant Transit Authority

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in programs and activities receiving Federal financial assistance. Once a transit agency accepts federal funds, all its programs and activities are covered, regardless of their funding source. Related statutes and Presidential Executive Orders under the umbrella of Title VI address services to those individuals with Limited English Proficiency (LEP), women, and those with disabilities.

Grant Transit Authority (GTA) cannot, based on race, color, national origin, or sex, whether directly or via contracts, refuse access to program services, assistance, or benefits; offer distinct services, assistance, or benefits, or deliver them differently from how they are provided to others; or isolate or treat individuals differently in any aspect concerning the receipt of services, assistance, or benefits.

This policy reflects GTA's commitment to non-discrimination and its dedication to providing safe and accessible transit services to all individuals, regardless of their race, color, or national origin.

PUBLIC NOTIFICATION OF TITLE VI RIGHTS

GTA publicly affirms its commitment to full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes and regulations in every program and activity it undertakes. Title VI requires that no individual be excluded from participation, denied benefits, or subjected to discrimination based on race, color, sex, or national origin in any Federal Transit Administration program or activity funded through GTA.

Individuals who believe they have faced unlawful discrimination under Title VI may file a formal complaint with GTA. All Title VI policy documents are available at the Multimodal Transit Center (MTC), at 116 W. 5th Ave., Moses Lake, WA. Complaint forms can be requested from a Customer Service Representative at the MTC or downloaded from GTA's website. For information in another language, please contact the Title VI Coordinator.

Attachment D provides the public with notification of GTA's Title VI Policy with information on how to accessibly obtain the full policy. The public notification also includes a list of locations where GTA's Title VI Notice is posted.

TITLE VI COMPLAINT PROCEDURES

GTA is committed to ensuring that no person is excluded from participation in, or denied benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI of the Federal Transit Administration (FTA) Circular 4702.1.B.

Any person who believes they have been discriminated against on the basis of race, color, or national origin by GTA may file a Title VI complaint by completing and submitting a signed Title VI Complaint Form which can be accessed at www.granttransit.com or by requesting a copy from GTA staff at 116 W. 5th Ave., Moses Lake, WA 98837 or calling 509-765-0898.

GTA follows all WSDOT and FTA retention record policies, including WSDOT's Consolidated Grant Program requirements, including retaining the working file for each complaint for a minimum of six years beyond the end of each project.

You may file a signed, written complaint up to one hundred and eighty (180) days after the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number or email address)
- 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

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

**Grant Transit Authority
Title VI Coordinator
PO Box 870
Moses Lake, WA 98837**

By phone: (509) 765-0898

By Fax: (509) 350-8203

Note: GTA encourages all complainants to certify mail sent through the US Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by fax, an original signed copy of the complaint must be mailed to the Title VI Coordinator no later than 180 days from the alleged date of discrimination.

GTA's process for addressing a Title VI complaint

GTA will directly address all complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by GTA. GTA shall also provide appropriate assistance to complaints from people with disabilities and those who are limited in their ability to communicate in English. Additionally, GTA shall make every effort to address complaints expeditiously.

- Once a complaint is received, GTA will review it, log it, and send the complainant an acknowledgement letter via email or mail within 14 days.
 - When additional information is needed to investigate the complaint, GTA 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 will result in the administrative closure of the complaint.
- Once the complaint has been logged, GTA has 60 days to resolve the issue, not including the appeals process.
 - When GTA receives sufficient information about the complaint, a written response will be drafted, subject to review by GTA's attorney. If appropriate, GTA's attorney may administratively close the complaint. In this case, GTA will notify the complainant of the action as soon as possible.

GTA 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 GTA, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the FTA.

**Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
1200 New Jersey Ave. SE
Washington, DC 20590**

**Washington State Department of Transportation (WSDOT)
Public Transportation Division**

Grant Transit Authority
Approved Date: August 21, 2025
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Attention: Title VI Coordinator
PO Box 47387
Olympia, WA 98504-7387

APPLICABILITY TO CONTRACTORS

GTA's Contractors and subcontractors, if any, are responsible for complying with the Title VI Program of the recipient with whom they are contracting. GTA ensures that contractors and subcontractors are following the Title VI Program and complying with Title VI. GTA requires compliance through contractual obligation with the ability to. If applicable, GTA will review contractors' and/or subcontractors' Title VI policies to ensure compliance with the Title VI Program.

RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

GTA has had no Title VI investigations, complaints, or lawsuits concerning programs, services, or other transit benefits. GTA is committed to maintaining a log for all Civil Rights Complaints and can provide a copy upon request through a submitted public records request via letter or email to GTA.

PUBLIC PARTICIPATION PLAN

GTA is committed to engaging residents, businesses, property owners, and other stakeholders in planning and decision-making processes, as well as its marketing and outreach activities.

GTA's public involvement strategy offers continuous and special opportunities for the public to be involved in ongoing and proposed transportation decisions, such as service design changes, new services and programs, and service policy changes.

The goal of GTA's Public Participation Plan is to offer opportunities for the engagement of all citizens, including minority and limited English proficient populations, in the development of proposed plans and service changes. To fulfill this goal, GTA will determine what non-English languages, and other cultural barriers exist in GTA's service area, provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area, and 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.

Outreach Efforts

In addition to GTA's public notification policies and process requirements, staff may use the following techniques during planning studies as deemed appropriate:

- Presentations to professional organizations, citizens, and other entities
- Interviews with local radio stations (both English and Spanish speaking)
- Press releases and meetings with local media representatives
- Informational conversations with individuals and small groups
- User and non-user surveys
- Use of illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the internet

During any planning process, the public is invited to contact GTA with comments and/or to request additional information. Requests can be made by telephone by contacting us at 509-765-0898, or through the contact form at www.granttransit.com/contact. Comments will be collected, documented, and presented to the GTA Board of Directors. GTA does not record social media interactions as part of the formal public comment process.

GTA provides in-house translation services with Spanish-speaking employees and a third-party translation company via phone for numerous other languages. GTA offers Travel Training through People for People with Spanish-speaking employees.

GTA will provide ACCESS (through People for People) or Dial-A-Ride Transportation (DART) service to and from public meetings regarding service changes if the person is unable to use fixed route services to attend. Individuals will need to arrange transportation services at least 24 hours in advance to the public meeting.

Transit Development Plan (TDP)

The TDP is a requirement of the Washington State Legislature (RCW 35.58.2795). GTA prepares the plan and submits it to WSDOT. The plan shows the size of the fleet, costs, revenues, service and revenue miles and hours, expenses, and capital expenditures. GTA holds a public hearing annually to obtain comments on the TDP.

Board Meetings

The GTA Board of Directors holds public monthly meetings on the 3rd Thursday of each month at GTA's MTC located at 116 W 5th Ave, Moses Lake. An Agenda is available on our website the day of the board meeting and is made available in alternative formats upon request.

Public Meetings

When new services or programs are proposed or significant route changes are made, information is disseminated to the affected neighborhoods or areas, and public meetings are scheduled. Rider alerts are placed on buses, shelters, and route signs to advertise for public meetings with impacted populations.

Customer Complaint Process

Members of the public may contact GTA to submit a comment or complaint. All comments/complaints are entered in a database. Each complaint will have an investigation with a follow-up response to the citizen filing the complaint. This process can be initiated by calling GTA at (509) 765-0898, or by visiting the administration office located at 116 W 5th Ave, Moses Lake, WA.

Bilingual Outreach

GTA's Customer Service Representative provides Spanish-speaking guests with information on public transit services in Spanish at the administration office, public meetings, and outreach events. All

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

GTA is dedicated to eliminating language barriers by establishing uniform language assistance standards throughout its service area.

GTA takes reasonable measures to provide meaningful access to its programs, services, information, and benefits for individuals with LEP. Following the USDOT's LEP Guidance, GTA conducted the required four-factor analysis to assess public interactions and determine the optimal combination of LEP services to provide.

Four Factor Analysis

1) Number or proportion of LEP persons in the service area

GTA's jurisdiction (or PTBA) covers the entirety of Grant County, Washington. According to the most recent census data, GTA's service area has a population of approximately 100,100 with about 50% of people who are non-white or of Hispanic/Latino origin. Spanish spoken in the household (where English is spoken very well) represents 15% or 15,015 people. All other languages spoken that are non-English and non-Spanish for both English spoken very well and not very well, make up a population of 2.2%, or 944 people¹.

¹ American Community Survey 5-year: 2019-2023, using Census Tracts. Stats estimated by geospatial intersection to cover GTA's PTBA jurisdiction using Remix by Via software.

2) Frequency with which LEP persons come into contact with services

GTA serves LEP person daily via our buses, paratransit (ACCESS), and Dial-A-Ride Transportation services. Some customer service representatives (CSR) speak Spanish and many operators are proficient in Spanish as well. For our operators and CSRs who do not speak Spanish, GTA relies on a third-party translator that is available to both CSRs and operators in revenue vehicles.

3) Nature and importance of services

GTA provides important and critical public transportation services to the residents of the PTBA through its fixed-route, paratransit, demand response, and rideshare services and programs.

GTA's programs and services enable people to commute to work, school, medical appointments, and social activities, particularly for those without access to personal vehicles. GTA's paratransit and DART services provide independence and access to essential activities like healthcare, shopping, or social events for all customers in the PTBA. For instance, a person with mobility challenges can attend medical appointments without relying on family, improving their quality of life and dignity.

GTA ensures equitable access to transportation by offering a fare-free service, enabling underserved populations to participate in economic and social opportunities. For example, a rural student can attend courses at Moses Lakes Columbia Basin Technical Skills Center, or college classes at Big Bend Community College, advancing their education and future prospects.

GTA is actively involved in emergency management and preparation with Grant County and local jurisdictions. GTA is prepared and ready to provide transportation during emergencies, such as natural disasters, to evacuate residents or deliver supplies. These services are lifesaving, ensuring vulnerable populations, like the elderly or those without cars, can safely evacuate during events like tornadoes, flooding, or wildfires.

4) Resources available for meaningful access to services for LEP persons

GTA's current in-house language capabilities are English and Spanish only. Staff has the ability to provide printed materials in any language, upon request. Staff also has the ability to provide language translation services through a third party via phone or tablet application on revenue vehicles or at any customer service location.

Additionally, GTA has publications in both English and Spanish, with the route guide displaying information in both languages. Special notices of public meetings and accommodations are always made available in Spanish. For every outreach opportunity

and public meeting, GTA ensures a Spanish speaking staff member is onsite and available.

Implementation Plan

GTA has implemented its plan and will review it on a triennial basis unless a Title VI complaint necessitates an earlier review. GTA will continue to identify LEP persons in the service area to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by quarterly ridership surveys, telephone contact counts, neighborhood demographics, and general awareness surveys. GTA's Title VI Policy and a Complaint Form are available on our website and as Attachment A.

All printed maps and schedules include Title VI language. If there is a service change, notices run in the newspaper in both Spanish and English. GTA also has flyers on the bus which are printed as the information changes. In order to comply with 49 CFR 21.9(d), GTA and its subrecipients provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded to them by Title VI.

MINORITY REPRESENTATION ON COMMITTEES

GTA does not currently have non-elected citizen committees.

CONSTRUCTION PROJECT EQUITY ANALYSIS

Over the last five years GTA has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS) but is aware of the Title VI requirements to conduct equity analyses for all facility construction projects during the planning state. GTA will follow all requirements under the National Environmental Policy Act and other overarching planning processes to guide equitable consideration of facility sites and their impacts. A facility that results in Disparate Treatment may have substantial legitimate justification and lack of other alternatives. If so, both must be demonstrated in the planning process.

SERVICE STANDARDS

Vehicle Load Standards

GTA will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. The objective is to provide a seat for every passenger; however, in peak periods, this means that some passengers may be expected to stand for part of the trip. Consideration is given to matching the capacity of

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vehicles to the historic ridership levels on a route to avoid unnecessary increases in service levels. If the standard is consistently exceeded for the average calculation, GTA may consider larger vehicles for the route(s) in question, or more frequent service to improve the riding experience for all passengers. All revenue vehicles are wheelchair lift or ramp equipped.

Where services operate on a highway, services will be planned for all riders to be seated. The following are the maximum loading standards for GTA based on a percentage of seats provided. All vehicles are assigned based on passenger load, route demand, and run cut.

Vehicle Type	Load
Heavy Duty Bus	125%
Cutaway	100%*

*No standees

Vehicle Headway Standards

Urban Routes – On weekdays, one (1) hour or better service should begin no later than 7:00 a.m. and continue until at least 6:00 p.m.

Local Feeder Routes – On weekdays, two (2) hour or better service should begin no later than 7:00 a.m. and continue until at least 6:00 p.m.

Express Routes – On weekdays, two (2) hour or better service should begin no later than 6:00 a.m. and continue until at least 7:00 p.m.

Scheduling involves the consideration of numerous factors, including ridership productivity, a transit/pedestrian-friendly street network, the density of transit-dependent populations and activities, the relationship to the Grant County Regional Transportation Plan, the relationship to major transportation developments, land use connectivity, and transportation demand management.

On-Time Performance Standards

A GTA vehicle is considered on time if it departs a scheduled route no more than seven (7) minutes past the scheduled time of departure and arrives at the destination no more than seven (7) minutes after the scheduled time of arrival.

GTA's on-time performance objective is 95% or above. GTA continuously monitors on-time performance, and system results are included in monthly performance reports.

Service Availability Standards

GTA will strive to distribute its transit service within incorporated cities/towns in the service area so that a minimum of 75% of residents are within a three-quarter (3/4) mile walking distance to a bus route.

Vehicle Assignment Policy

Vehicles will be assigned to the communities and geographic areas served such that the average age of the fleet serving these areas does not exceed twelve (12) years if possible, based on fleet availability. Low-Floor buses are deployed on frequent and other high-ridership routes, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet.

Bus assignments take into account the operating characteristics of various bus sizes, which are matched to the operating characteristics of the route. Local feeder routes with lower ridership may be assigned smaller buses rather than larger buses. Some routes requiring tight turns on narrow streets are typically operated with smaller buses.

Transit Amenities Policy

Installation of transit amenities such as bus shelters, waste receptacles and information provisions along bus routes are based on the number of passenger boarding's at stops along these routes.



ATTACHMENT A Title VI Complaint Form

TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Grant Transit Authority
Title VI Coordinator
PO Box 870
Moses Lake, WA 98837
Phone: (509) 765-0898
Fax: (509) 350-8203

Please Print Clearly:

Name: _____

Address: _____

City, State, Zip: _____

Telephone Number: _____ (home) _____ (cell) _____ (message)

Person Discriminated Against: _____

Address of person discriminated
against: _____

City, State, Zip: _____

Please indicate why you believe the discrimination occurred:

- ☐ race or color
- ☐ national origin
- ☐ income
- ☐ Other

What was the date of the alleged
discrimination? _____

Where did the alleged
discrimination take place? _____

Please describe the circumstances as you saw it:

Please list any and all witnesses' names and Phone Numbers:

Name: _____	Phone: _____
Name: _____	Phone: _____
Name: _____	Phone: _____
Name: _____	Phone: _____
Name: _____	Phone: _____

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the Title VI Coordinator at the address listed on page 1 of this document.

Your signature

Print your name

Date

ATTACHMENT B

Public Outreach Efforts

Date	Event	Purpose
2/18/2023	Ephrata Transit Center	Systemwide Transportation Analysis
2/18/2023	Quincy Senior Center	Systemwide Transportation Analysis
2/17/2023	Grand Coulee Senior Center	Systemwide Transportation Analysis
2/15/2023	Moses Lake Multimodal Transit Center	Systemwide Transportation Analysis
4/13/2023	Moses Lake Multimodal Transit Center	Systemwide Transportation Analysis
4/17/2023	Virtual meeting	Systemwide Transportation Analysis
4/13/2023	Grand Coulee Senior Center	Systemwide Transportation Analysis
4/13/2023	Quincy Senior Center	Systemwide Transportation Analysis
4/14/2023	Ephrata Transit Center	Systemwide Transportation Analysis

ATTACHMENT C

Grant Transit Authority Public Participation Contact List

Depending on the situation and the relevance, GTA may engage any of the following contacts within the community.

- Grant County Integrated Health Services
- Opportunities Industrialization Council
- Grant County Sheriff
- Moses Lake Police Department
- Quincy Police Department
- Ephrata Police Department
- Grant County Economic Development Council
- Grant County Housing Authority
- Moses Lake Downtown Association
- Moses Lake Chamber of Commerce
- Samaritan Hospital
- Port of Moses Lake
- Walmart – Moses Lake & Ephrata
- Moses Lake Police Department
- Moses Lake Senior Center
- Big Bend Community College
- Columbia Basin Skills Center
- Moses Lake School District
- Ephrata School District
- Quincy School District
- Soap Lake School District
- Warden School District
- Almira Coulee Hartline School District
- Grand Coulee School District
- Mattawa School District
- Royal City School District
- Wilson Creek School District
- Work Source



GRANT TRANSIT AUTHORITY TITLE VI POLICY NOTICE

Effective Date: 08/21/2025

PUBLIC NOTIFICATION OF TITLE VI RIGHTS

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PUBLIC NOTICE POSTING

This notice is posted in the following areas:

- GTA Website: www.granttransit.com/policies
- MTC CSR office: 116 W. 5th Ave., Moses Lake, WA 98837
- MTC Community Room: 116 W. 5th Ave., Moses Lake, WA 98837
- Ephrata Transit Center: 548 Basin St SW, Ephrata, WA 98823
- All GTA revenue vehicles

ATTACHMENT E

List of Transit-Related Title VI Investigation Complaints and Lawsuits

GTA follows all WSDOT and FTA retention record policies, including WSDOT's Consolidated Grant Program requirements, including retaining the working file for each complaint for a minimum of six years beyond the end of each project.

List of Transit Related Title VI Investigations, Complaints, & Lawsuits				
	Date	Summary of the allegation(s)	Status	Action(s) Taken
Investigation				
Lawsuit				
Complaint				