



# Title VI Plan

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## Overview

This plan establishes a framework for efforts the Spokane Regional Clean Air Agency (SRCAA) will take to comply with the provisions of Title VI of the Civil Rights Act of 1964 (the Act) and the Civil Rights Restoration Act of 1987.

Founded in 1969, SRCAA is a special purpose, local government agency chartered under the 1967 Washington State Clean Air Act. SRCAA works to achieve and maintain clean air in Spokane County, Washington by administering local, state, and federal air quality laws and regulations. SRCAA key programs include air monitoring and reporting, asbestos control during renovation and demolition, business registration and permitting, community outreach and educational resources, and complaint response and enforcement.

SRCAA is governed by a 5-member Board of Directors that meets monthly to provide direction and act on items such as adopting regulations and an annual budget. The Board consists of one County Commissioner, one representative from each of the two largest cities, a representative of the County's small cities and towns, and a member-at-large.

SRCAA's 9-member volunteer Advisory Council is appointed by the Board to provide advice on air pollution policies, regulations, and programs. Council members bring diverse perspectives to issues based on their areas of expertise, including agriculture, chemistry, environment, fire protection, industry, public health, and the business community.

## Policy, Authorities, Notice to the Public

### Policy Statement:

The Spokane Regional Clean Air Agency assures that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance on the basis of their creed, religion, gender identity, sexual orientation, age, disability, or marital or veteran status, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987. The Agency's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, coordinating required reporting, and other agency responsibilities with the Executive Director and Section Managers, as required by Title 23 CFR Part 200, and Title 49 CFR Part 21.



Scott Windsor, Executive Director  
Spokane Regional Clean Air Agency

### Authorities:

Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; Uniform Relocation Act, 42 USC 4601 to 4655; 23 USC 109(h); Prohibition of discrimination on the basis of sex, 23 USC 324; Department of Transportation Order 1050-2; Executive Order 12898 (Environmental Justice); Executive Order 13166 (Language Access); 10 CFR 1040, Nondiscrimination in federally assisted programs or activities; 28 CFR 50, Statements of policy; 29 CFR 1691, Procedures for complaints of employment discrimination filed against recipients of federal financial assistance; 40 CFR Part 7; 49 CFR 21, Nondiscrimination in programs or activities receiving federal assistance from the EPA; RCW 49.60 et. seq.

### Notice to the Public:

The paragraph below will be posted at SRCAA's office, on SRCAA's website and may be inserted in significant publications that are distributed to the public. The notice to the public may also be included in public service announcements, notices of proposed projects or meetings, and hearings. The Title VI Plan will be posted on the website, in the office, and will be translated into other language upon request.

Long version:

"The Spokane Regional Clean Air Agency hereby gives public notice that it is the policy of the Agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity for which the Agency receives federal financial assistance. In addition to the grounds covered under Title VI, the Agency also assures that no person shall be excluded from participation in Agency programs or activities on the basis of creed, religion, gender identity, sexual orientation, age, disability, marital, or veteran status. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a

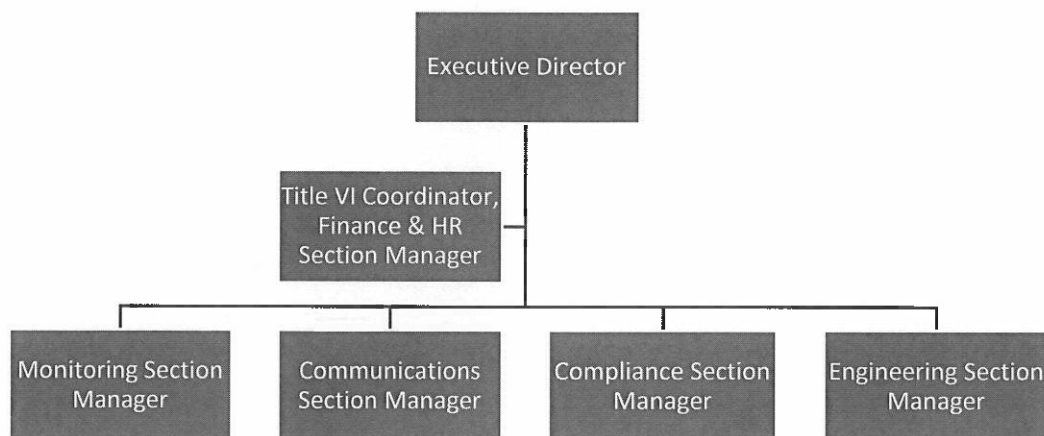
right to file a formal complaint with the Agency. Any such complaints must be in writing and filed with the Agency's Title VI coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to submit a complaint, please see our website at [www.SpokaneCleanAir.org](http://www.SpokaneCleanAir.org) or call 509-477-4727 and ask for the Title VI Coordinator."

Short version:

"The Spokane Regional Clean Air Agency fully complies with Title VI of the Civil Rights Act of 1964 and does not discriminate based on race, color, sex, or national origin in its programs and activities. In addition, the Agency also assures non-discrimination on the basis of creed, religion, gender identity, sexual orientation, age, disability, marital status, or veteran status. For more information, or to submit a Title VI complaint, call 509-477-4727."

## Spokane Regional Clean Air Agency Organization & Title VI

The Executive Director is responsible for overseeing the Agency's Title VI program and ensuring compliance. The Title VI Coordinator is responsible for coordinating this body of work and works with section managers to ensure appropriate measures are taken to implement, evaluate and improve the program.



### Title VI Coordinator Responsibilities:

- Work with Executive Director and Section Managers to:
  - Identify areas where SRCAA can eliminate discrimination.
  - Ensure programs comply with Title VI, including reporting for annual review.
- Facilitate annual review and evaluation of Title VI plan at the end of the fiscal year:
  - Correct deficiencies or findings.
  - Prepare annual report of accomplishments and changes, identify goals for upcoming fiscal year.

- Update plan as needed.
- Collect statistical data to inform Title VI plan efforts:
  - Use US Census data to help inform the agency programs, language access plan, and the Title VI plan.
  - Research additional data collection opportunities, i.e., stakeholders voluntarily complete demographics form at community meetings, potential hires voluntarily complete demographics form as part of application process.
- Coordinate training programs on Title VI issues and regulations for SRCAA staff and track employee training.
- Work with Communications Section Manager to disseminate Title VI information to employees and public.
  - Reception area, website, agency publications, meeting agendas, etc.
- Address Title VI complaints received by the agency.
  - Any person that believes they have faced unequal treatment or discrimination may file a complaint with SRCAA, see page 6 for complaint procedure.

## Title VI Program Responsibilities

### Communication and Engagement

SRCAA is committed to compliance with Title VI requirements in all aspects of SRCAA's public engagement process, including the following items:

- Include abbreviated Title VI notice on Board agenda and agency website.
- Develop and distribute information on Title VI and SRCAA programs to employees, contractors, and the general public.
- Use a variety of notification techniques to inform and to gather feedback, i.e., newsletters, list-serve emails, social media, news releases.
- SRCAA public meetings, including Board of Director meetings, are held at SRCAA's office which is accessible to persons with disabilities and to people who rely on public transit. When notified, SRCAA can schedule services for sight and hearing impaired.
- Provide information and language service coordination for languages other than English following SRCAA's Language Access Plan (LAP).
  - "I-speak" cards provided for administration and inspection staff in the two most common non-English languages spoken in Spokane County, Spanish and Slavic. As language access needs change, SRCAA will create additional "I-speak" cards.
  - Future website updates to provide broader language access.

### Data Collection

SRCAA currently collects demographic data from the U.S. Census Bureau, the U.S. Environmental Protection Agency EnviroScreen, and the WA State Department of Health Disparities Map.

### Training, Recruitment and Contracts

SRCAA is committed to compliance with Title VI requirements in all aspects of SRCAA's employee training, recruitment and contracts.

- Staff are required to participate in Title VI training every three years and during new staff orientation. Training may include review of this document and online training, such as Understanding and Abiding by Title VI of the civil Rights Act of 1964, 23 minutes, <https://www.lep.gov/video/understanding-and-abiding-title-vi-civil-rights-act-1964> Civil Rights Training for Recipients of Federal Financial Assistance, by the Dept of Justice, 1:16, <https://ovc.ojp.gov/media/video/23001>
- SRCAA takes intentional steps to ensure its workforce reflects the demographics of Spokane County, including but not limited to: job postings online, in the newspaper, and professional associations.
- Title VI language is included in Request for Proposals (RFPs).
- SRCAA takes steps to enter into contractual agreements with a diverse range of parties in accordance with Title VI requirements.
- If a contractor is found in violation, the Title VI Coordinator will work with contractor to resolve the deficiency.

### Agency Programs

In our work to protect ambient air quality, SRCAA provides many programs and services to residents and businesses in Spokane County.

**Clean Air Initiatives** – Woodstove changeout program to recycle old polluting devices and replace with new efficient devices. Partner with area libraries and schools to deploy air sensors to obtain more localized air quality data, often in lower income areas. Partner with Commute Smart NW to reduce drive alone vehicles and increase use and access of commute alternatives.

**Permitting** – Engineers issue air quality permits for stationary sources to ensure emissions and control equipment comply with the federal and state clean air act. Free interpretation/translation service is available.

**Enforcement** – Inspectors visit stationary sources to verify compliance with the permit and air quality regulations. Inspectors visit asbestos project sites to verify compliance. Inspectors respond to complaints from citizens about air pollution issues that are affecting them where they work or live. Common air quality complaints are related to excessive smoke from outdoor burning and wood heating, dust from roads and parking lots, and odors from a variety of operations. Free interpretation/translation service is available.

**Air Monitoring** – SRCAA operates and maintains a network of ambient air quality monitoring stations throughout Spokane County. Hourly data from our monitors, along with meteorological data, enables us to notify the public when air quality is approaching unhealthy levels and to encourage clean air actions to help reduce air pollution. During the 2023-2024 heating season the agency will implement a black carbon survey in one of the ten overburdened communities that the WA Department of Ecology identified in the state.

**Asbestos Control** - To protect public health from uncontrolled releases of hazardous asbestos fibers, we work to ensure that asbestos regulations are followed when residential and commercial structures are being renovated or demolished.

## Title VI Discrimination Complaint Procedures

1. Any person who believes that they have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, and the Civil Rights Restoration Act of 1987, may file a complaint with SRCAA. The Title VI Coordinator will review complaints.
2. The complainant must file the complaint with SRCAA no later than 180 days after the date of alleged act of discrimination or where there has been a continuing course of conduct, the date on which that conduct with discontinued.
3. Complaints must be submitted to SRCAA in writing and be signed by the complainant and or the complainant's representative. Complaints must include the facts and circumstances surrounding the claimed discrimination. If a person makes a verbal complaint to a SRCAA officer or staff, the person will be interviewed by the Title VI Coordinator. The coordinator can assist the person with writing the complaint and obtain a signature from the complainant for submittal.
4. Within 10 days, the Title VI Coordinator will acknowledge receipt of the complaint, inform complainant of action taken or proposed action to process the complaint, and advise the complainant of other avenues or redress available, including other state and federal agencies.
5. For complaints against a contractor or subrecipient of SRCAA, SRCAA will investigate the complaint. For complaints against SRCAA, SRCAA will refer the complaint to the appropriate state or federal agency for investigation.
6. The Agency will advise pertinent state or federal agencies within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to applicable agencies:
  - a. Name, address, and phone number of the complainant.
  - b. Name(s) and address(es) of alleged discriminating official(s).
  - c. Basis of complaint (i.e., race, color, national origin, or sex).
  - d. Date of alleged discriminatory act(s).
  - e. Date of complaint received by the Agency.
  - f. A statement of the complaint.
  - g. Other agencies (state, local or federal) where the complaint has been filed.
  - h. An explanation of the actions the Agency has taken or proposed to resolve the issue(s) raised in the complaint.
7. Within 60 days, the Title VI Coordinator will investigate the allegation(s) in the complaint and based on the information obtained, will render a recommendation for action in a report of findings to the Agency's Executive Director. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
8. Within 90 days of receipt of the complaint, SRCAA's Executive Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with pertinent state or federal agencies if they are dissatisfied with the final decision rendered by SRCAA. The Title VI Coordinator will also provide pertinent state or federal agencies with a copy of this decision and summary of findings upon completion of the investigation.

9. Contacts for different Title VI administrative jurisdictions are as follows:

WSDOT, Office of Equal Opportunity, Title VI Program

PO Box 47314

Olympia, WA 98466

(360) 705-7098

Federal Highway Administration, Washington Division Office

711 Capitol Way South, Suite 501

Olympia, WA 98501

(360) 534-9325

Washington Human Rights Commissions

711 S. Capitol Way, Suite 402

Olympia, WA 98504-2490

(360)753-6770 (phone)

(360) 586-2282 (fax)

1-800-233-3247 (toll free)

1-800-300-7525 (TTY)

U.S. Environmental Protection Agency, Office of Civil Rights (1201A)

1200 Pennsylvania Ave., NW

Washington, DC 20460

(202) 564-0690 (phone)

(202) 565-0196 (fax)

Office of Economic Impact and Diversity, U.S. Department of Energy

1000 Independence Avenue, SW

Washington, DC 20585

(202) 586-2218