



TITLE VI PLAN

March 2024

City of Bellevue Federally Funded Transportation Program

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I. Policy Statement, Authorities, and Citation

It is the policy of the City of Bellevue that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the City of Bellevue as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the City of Bellevue, including its contractors and anyone who acts on behalf of the City of Bellevue. This policy also applies to the operations of any department or agency to which the City of Bellevue extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. Assurance of compliance, therefore, falls under the proper authority of the City Manager's Office pursuant to its budgetary authority and responsibility. The City Manager, Department Director, and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

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City Manager

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II. Organization, Staffing and Structure

AGENCY ADMINISTRATOR

The City Manager is authorized to ensure compliance with the provisions of the City's policy of non-discrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. The City's grants compliance function and Title VI coordination shall be performed under the authority of the City Manager. The City Manager may designate the Transportation Department Director to provide oversight of Federal grants compliance and Title VI coordination within the director's functional area. The City Manager may also designate other departments and agency personnel to provide oversight of Title VI coordination for other city functions, particularly to ensure that all city programs and activities comply with the general nondiscrimination, Environmental Justice, and Limited English Proficiency requirements that apply to the entire agency.

TITLE VI COORDINATORS

The City of Bellevue has designated the position of Transportation Capital Facilities Planning and Programming Manager to perform the duties of the Title VI Coordinator for the Transportation Department and ensure implementation of the City's Title VI federally funded Transportation Program. The Transportation Capital Facilities Planning and Programming Manager has other duties and responsibilities in addition to Title VI. Although the Transportation Capital Facilities Planning and Programming Manager is not directly supervised by the Transportation Department Director, this position, when serving in the role of Title VI Coordinator, shall have an indirect reporting relationship and access to the Department Director.

The City of Bellevue has also designated the position of ADA, Title VI, and Equal Opportunity Officer, located in the Human Resources Department, as a City Title VI Coordinator, who collaborates with the Transportation Capital Facilities Planning and Programming Manager regarding Title VI citywide. The ADA, Title VI, and Equal Opportunity Officer promotes access, equity, inclusion and opportunity throughout all city departments and public contact activities. The ADA, Title VI, and Equal Opportunity Officer works closely with the Diversity, Equity & Inclusion Administrator, the Diversity, Inclusion & Outreach Administrator, the Title VI Core Team, and the Human Resources Director to develop and implement nondiscrimination policies, public participation strategies, language translation and interpretation services, disability accommodation services, equity in contracting and procurement, diversity hiring and recruitment plans, and other citywide initiatives that ensure full compliance with Title VI. The ADA, Title VI, and Equal Opportunity Officer also has responsibility for implementing the Americans with Disabilities Act and preparing the city's ADA Self-Evaluation and Transition Plan and periodic updates and works closely with Transportation Department staff to complete these tasks.

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The Title VI Coordinators collaborate on:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to WSDOT;
- Developing procedures for the collection and analysis of statistical data;
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination; and
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

TITLE VI SPECIALISTS

Additionally, the Transportation Department has designated Title VI Specialists in departmental emphasis areas. The Specialists, designated areas shown below, shall work in concert with the Transportation Department Title VI Coordinator and City Title VI Coordinator. These key programs or departmental areas may receive Federal assistance through grants or other types of transportation-related funding or are responsible for implementing directives and policies to ensure civil rights compliance and equal opportunity. The Specialists will work with the Title VI Coordinators to ensure their respective divisions and programs comply with Title VI regulations and assurances, meet the objectives of the Title VI Plan, meet federal and state reporting requirements, and provide adequate training opportunities for applicable staff.

Title VI Specialists will work with the Coordinators to ascertain Title VI compliance by contractors, subcontractors, consultants, suppliers and other sub-recipients under Federally funded projects or programs. Specialists will ensure applicable Title VI provisions and requirements are included in contractual agreements for prime contractors and sub-recipients. Specialists will work with the Coordinators to obtain statistical data on race, color, national origin, language proficiency, income level, disability, and other beneficiaries of federally funded City of Bellevue transportation programs. Each of the Specialists will work with staff to maintain data relative to their respective emphasis program area, designated below. The Coordinators shall use the data to complete annual Title VI reports and for other administrative needs.

Title VI Specialists Emphasis Area:

- Capital Projects
- Contracts
- Administration
- Neighborhood Services
- Planning/Grants
- Public Information
- Real Property
- Mobility Management/Traffic Operations

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TITLE VI CORE TEAM

The City of Bellevue has also designated representatives in each department to serve on a city-wide Title VI Core Team. These representatives serve as a conduit between their departments and the city's ADA, Title VI and Equal Opportunity Officer on issues related to Title VI compliance. They serve as subject matter experts on Title VI compliance for staff within their department, and coordinate with department leadership on departmental progress related to Title VI efforts. Title VI Core Team members gain the necessary training and education needed to serve in the core team role by working with the city's ADA, Title VI and Equal Opportunity Officer to identify responsibilities and opportunities for improvement within their department. This includes developing an annual Title VI workplan, working towards goals established in that workplan, and regularly checking in with the city's ADA, Title VI and Equal Opportunity Officer on progress. In addition, when needed, Title VI Core Team members work with the city's ADA, Title VI and Equal Opportunity Officer to address and mitigate Title VI compliance grievances and complaints. They also serve as the department-wide point of contact for public requests for Title VI-related accommodation assistance. For further information on the Title VI Core Team, including the full team charter, see APPENDIX.

The organizational charts in Appendix 6 reflect the organizational structure of the City of Bellevue as related to Title VI compliance.

III. Primary Program Area Descriptions and Review Procedures

TITLE VI COORDINATOR'S RESPONSIBILITIES AND PROGRAM ADMINISTRATION

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

Planning Activities

Authorities.

Bellevue City Code; 23 CFR 450; RCW 35.77; RCW 36; RCW 47.06 Statewide Transportation Planning; RCW 47.80 Regional Transportation Planning Organization (RTPO)

General Description

The Transportation Planning Division has responsibility for providing long-range planning, program development, and capital programming necessary to provide efficient transportation services to City of Bellevue citizens. The city annually updates and coordinates its six-year plan for transportation improvement programs and projects and bi-annually updates its seven-year Capital Investment Program plan. The updates inform other City of Bellevue departments and neighboring jurisdictions of the current planning direction for transportation needs.

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Title VI/Non-discrimination Concerns/Responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Ensuring that projects are assigned/prioritized without discrimination. Projects included in the annual report are the result of evaluation and the prioritization of needs in various transportation areas.
- Ensuring all six-year Transportation Improvement Program plans are consistent with the policies of the adopted Comprehensive Plan approved under the State's Growth Management Act.
- Inviting the participation of a cross section of the populace from social, economic, and ethnic groups in the planning process.
- Disseminating written program information to minority media and ethnic organizations, and providing public service announcements, when forming citizen advisory committees or planning boards, and requesting involvement.
- Hosting meetings, at various times, in a variety of community buildings throughout the city, including those along transit routes.
- Ensuring that interpretation services and translated materials are available at meetings if needed or requested.
- Ensuring that public meetings are held in predominantly minority communities when transportation projects will specifically impact those communities.
- The Coordinator, in coordination with the project manager, will use the city's GIS-based, Mapshot, tool to generate a report of transportation project area that includes a map and demographic data of the neighborhoods affected by the projects.
- Obtaining demographic statistics, by utilizing the voluntary self-reporting form, at applicable community meetings and public hearings involving transportation planning sessions.
- Ensuring access to public meetings for all by putting the city's accommodation statement on all public facing materials.

Review Procedures for ensuring non-discrimination.

Review procedures for ensuring non-discrimination in this program area include, but are not limited to:

- Including input from the City Title VI Coordinator, various divisions in the department, neighboring local jurisdictions and organizations, citizen groups, and private individuals in review process for planning and prioritization of projects.
- Using demographic information from the GIS-based mapping tool to identify demographics pertaining to Title VI and other protected classes.
- Collecting demographic data at public meetings and events using a voluntary self-reporting form, available in multiple languages, which includes race, gender, and national origin. Completed forms will be provided to the Title VI Coordinator after each meeting. Data will be analyzed for discrepancies in access or involvement and improvements will be made.

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Consultant Contracts Activities

Authorities.

Bellevue City Code; WSDOT Local Agency Guidelines; 48 CFR 31; 23 CFR 172

General Description

The Planning, Mobility Management and Capital Projects Divisions are responsible for recommending consultant firms to support Transportation Department activities. Project managers participate in final selection, negotiation, and award with the approval of the City Council. In coordination with the project managers, the Procurement Services group in the Finance and Asset Management Department administers awarded consultant contracts.

Procurement Services staff or project management staff will request qualifications from consulting engineering firms specializing in various aspects of civil engineering, which may relate to transportation projects and the development of construction plans and special provisions for roads and bridges; design work associated with structures; performing environmental studies or preparing National Environmental Policy Act (NEPA) or State Environmental Policy Act (SEPA) documents for transportation projects.

Consultant selection from the certified list maintained by the Procurement Services group adheres to Washington State regulations and is consistent with City of Bellevue procurement and vendor policies.

Title VI/Non-discrimination Concerns and Responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Including applicable Disadvantaged Business Enterprise (DBE) goals in designated projects and seeking to proactively achieve the goal(s).
- Including Title VI assurance and provision language in all Federally funded consultant contracts.
- Maintaining updated demographic data on the utilization of women-and minority-owned consulting firms.

Review Procedures for ensuring nondiscrimination

Review procedures for ensuring non-discrimination in this program area include, but are not limited to:

- Periodically reviewing documents and language to ensure compliance with current laws and regulations. For planning and design contracts, information on the number of contracts, the contractor name, project name, contract amount, and WMDBE status of city contracts is periodically collected and included in the Annual Update Accomplishment Report. As needed, information on WMDBE status of consultants or sub-consultants including consultant names will be collected and included in the Annual Update Accomplishment Report.

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Design & Engineering / Environmental Activities

Authorities.

Bellevue City Code; Local Agency Guidelines - WSDOT- M36-63; Standard Plans For Road, Bridge and Municipal Construction-WSDOT; APWA - M21-01; Title 23, USC 109(d), 14(a), 217, 315 and 402(a); 23 CFR 1204.4; 23 CFR 771; EO 12898; 49 CFR 1.48(b)(33) and 1.48(c)(2); National Environmental Policy Act of 1969, 42 USC 4321; 40 CFR Part 1500; 49 CFR Part 622; WSDOT EPM M31-1; EO 12898

General Description

The Capital Program Services Division is responsible for implementing the Capital Investment Program (CIP) and environmental permitting for projects.

Title VI/Nondiscrimination concerns and responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Completing a NEPA Categorical Exclusion, NEPA Environmental Assessment, State Environmental Policy Act (SEPA) checklist, SEPA Determination of Non-Significance, or NEPA and/or SEPA Environmental Impact Statement, depending on the scope, complexity, and impacts of a project.
- Monitoring compliance with Title VI requirements in all aspects of conducting Environmental Impact Statements or Assessments.
- Ensuring the dissemination of information to and fostering participation from affected populations including having an accommodation statement on all public facing materials.
- Obtaining demographic data at community meetings and public hearings pertaining to the transportation design phase by utilizing the voluntary demographic form.
- Providing a comprehensive summary of the demographic and environmental data elements to be considered by the EIS/EIA process to the Title VI Coordinator, including updated summary lists as applicable.
- Placing public notices in applicable general and minority media; selecting accessible locations and times for public hearings or meetings, and arranging for translation services as needed, particularly in projects impacting predominantly minority communities.
- Ensuring the public has information pertaining to their rights to contact the department to view plans and discuss environmental problems.
- The Coordinator, in coordination with the project manager, will use the city's GIS-based, Mapshot, tool to generate a report of transportation project area that includes a map and demographic data of the neighborhoods affected by the projects.

Review procedures for ensuring nondiscrimination

Review procedures for ensuring nondiscrimination in this project area include, but are not limited to:

- Performing studies when needed or required to assess various environmental factors as they relate to the implementation of the City's transportation capital program, including evaluating demographic data.

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- Incorporating adequate time for the Coordinator to review and comment, as applicable, on the draft EIS/EIA to ensure there are no violations of the Federal Civil Rights Act, as amended, as a result of the City's Federal-Aid highway activities.
- Using demographic information from the GIS-based mapping tool to identify demographics pertaining to Title VI and other protected classes.
- Collecting demographic data at public meetings and events using a voluntary self-reporting form, available in multiple languages, which includes race, gender, and national origin. Completed forms will be provided to the Title VI Coordinator after each meeting. Data will be analyzed for discrepancies in access or involvement and improvements will be made.

Right-of-Way Activities

Authorities.

Right of Way Manual; 23 CFR 130; 49 CFR 24; RCW Chapter 47; WAC 468.100

General Description

The Real Property Services Group manages and coordinates the appraisal and acquisition of real property and relocation assistance services for transportation projects. The right of way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, businesses, farm operations, nonprofit organizations, and property management. The Real Property Services Group is not located within the Transportation Department, but rather reports through the Finance and Asset Management Department providing citywide services.

Title VI/Nondiscrimination Concerns and responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Ensuring equal opportunity in all aspects of procuring real estate service contracting and appraisal agreements.
- Following adopted City of Bellevue vendor procurement policies in the acquisition of contracted services.
- Utilizing current OMWBE directories identifying fee appraiser organizations and the Washington State Department of Transportation's list of certified fee appraisers when seeking services.
- Following the guidelines in the Right of Way Manual for property acquisition as well as applicable laws and regulations, including Title VI, ADA, and Section 504.
- Adhering to departmental policy of apprising affected property owners, tenants, and others involved in right-of-way acquisition of their rights and options regarding negotiation, relocation, condemnation, and other aspects of the acquisition process.
- Providing copies of relocation assistance literature produced by WSDOT and a copy of the City of Bellevue Title VI Compliance information sheet to all affected parties.
- Incorporating Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business.
- Coordinating the preparation of deeds, permits and leases to ensure the inclusion of

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the appropriate clauses, including Title VI Assurances.

- Ensuring that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment.
- Ensuring comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.

Review procedures for ensuring nondiscrimination

Review procedures for ensuring nondiscrimination in this program area include, but are not limited to:

- Maintaining data on awards to minority and female appraisers and providing data to the Title VI Coordinator.
- Bellevue's real property acquisition process parallels the requirements for federalized projects regardless of if there are federal funds included in the project financing. As such, all property owners received at least the fair market value of the acquired property as determined by an independent appraiser.
- Gathering statistical data including race, color, and national origin, when possible, from all real property transactions, and provide detailed demographic data annually to the Title VI Coordinator.

Construction Activities

Authorities.

Construction Manual M41-01; Maintenance Manual M51-01; Local Agency Guidelines; Standard Specifications for Road, Bridge, and Municipal Construction

General Description

This group is located in the Capital Program Services Division and is responsible for administration of all new construction contracts and inspecting bridges. The Capital Program Services Division is responsible for oversight and the administration of transportation construction projects, as set forth by policy decisions and supervision of the Transportation Department Director.

Title VI/Nondiscrimination concerns and responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Reviewing all federally funded projects for application of DBE goals with the department's Contract Administrator from the Transportation Financial Services group. As appropriate, include DBE provisions in those projects with designated goals.
- Awarding construction contracts on the basis of the lowest responsive bidder, as well as meeting DBE requirements.
- Including Title VI language in prime contract award letters to encourage utilization of DBE subcontracts and vendors.
- Ensuring that prime contractors with DBE requirements award contracted work to qualified DBEs that perform commercially useful functions.
- Including Title VI language in bid announcements and applicable construction documents, as stipulated in the City's Title VI Policy Statement (p. 2) and Assurances (p. 13-18) herein.

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- Monitoring all construction operations to ensure nondiscrimination throughout all efforts.

Review procedures for ensuring nondiscrimination

Review procedures for ensuring nondiscrimination in this program area include, but are not limited to:

- Coordinating the gathering of maintenance and construction information regarding DBE participation for the Annual Title VI Report; and provide to the Coordinator.

Maintenance Activities

Authorities.

Maintenance Manual M 51-01; Construction Manual M 41-01; Standard Specifications for Road, Bridge and Municipal Construction Section (M 41-10)

General Description

The Streets Maintenance group in the Mobility Management/Operations Division of the Transportation Department is responsible for maintaining City of Bellevue roads, bridges, and grounds by economically utilizing the resources of contractors, equipment, and materials.

Title VI/Nondiscrimination Concerns and responsibilities

Title VI responsibilities in the program area include, but are not limited to:

- Reviewing all federally funded projects for application of DBE goals with the department's Contract Administrator from the Transportation Financial Services group. As appropriate, include DBE provisions in those projects with designated goals.
- Monitoring all maintenance and construction operations to ensure nondiscrimination throughout all efforts.

Review procedures for ensuring nondiscrimination

Review procedures for ensuring nondiscrimination in this program area include, but are not limited to:

- Coordinating the gathering of maintenance and construction information regarding DBE participation for the Annual Title VI Report; and provide to the Coordinator.

IV. Review Procedures

Title VI Review of Sub-recipients of Federal-Aid Highway Funds

Transportation Title VI Specialists and the Title VI Coordinator will assist WSDOT to periodically conduct Title VI compliance reviews. Transportation Department staff will review select recipients of Federal-Aid highway or other Federal funds, to ensure adherence to Title VI requirements (see Section III). The Title VI Coordinator and Specialists will work cooperatively to periodically confirm operational guidelines provided to consultants, contractors, and sub-recipients, include Title VI language, provisions, and related requirements, as applicable.

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Post-Grant Reviews

The Coordinator will collaborate with Transportation and Procurement Services staff to conduct periodic post grant reviews of select recipients of Federal highway funds or other Federal funds, for roads, sidewalks, bridges, municipal construction, etc. to ensure adherence to Title VI requirements (see Section III). Appropriate staff will periodically confirm that operational guidelines provided to consultants, contractors and sub-recipients included Title VI language, provisions, and related requirements, where applicable.

Remedial Action.

When irregularities occur in the administration of Federal-aid highway programs at either the City or sub-recipient levels, corrective action will be taken to resolve identified Title VI issues. The City of Bellevue will seek the cooperation of the consultant, contractor or other sub-recipient in correcting deficiencies found during periodic reviews. The City will provide technical assistance and guidance, upon request, to support voluntary compliance by the sub-recipient. When conducting Title VI compliance reviews, the City will reduce to writing any recommended remedial action agreed upon by the Transportation Department and sub-recipient and provide a copy of the letter within a period not to exceed 45 days.

Sub-recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies. When a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the City of Bellevue will submit to WSDOT and FHWA copies of the case file and a recommendation that the sub-recipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ascertain if the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the City of Bellevue and WSDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR 21.

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V. Data Collection, Reporting, and Analysis

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
Planning	<p>Data collected: demographic data for planning studies, events and public involvement</p> <p>Process for collecting: use of a voluntary self-reporting form which includes race, gender, and national origin Completed forms will be provided to the Title VI Coordinator after each meeting.</p>	Track public participation/involvement and ensure outreach etc. is reaching minority communities. Ensure location of any event is accessible for all to attend, including transit routes and pedestrian and bicycle accessibility.
Consultant contracts	<p>Data collected: Information on the number of contracts, the contractor's name, project name, contract amount, and WMDBE status of city contracts. Included in the Annual Update Accomplishment Report.</p> <p>Process for collecting: Individual project managers and the department contract administrator collect this data for each project.</p>	Ensure nondiscrimination in consultant and contract awards.
Design & Engineering / Environmental Activities	<p>Data collected: Statistical data including race, color, and national origin on all Transportation real property transactions.</p> <p>Process for collecting: Mapshot demographic report and use of a voluntary self-reporting form which includes race, gender, and national origin. Completed forms will be provided to the Title VI Coordinator annually.</p>	Monitoring compliance in all aspects of conducting Environmental Impact Statements or Assessments. Ensure minority communities are informed and involved.
Right-of-Way	<p>Data collected: Data on awards to minority and female appraisers.</p> <p>Process for collecting: The City's Public Purchase procurement portal tracks women and minority appraisers.</p>	Ensure nondiscrimination in awards. Ensure nondiscrimination in project impacts, especially with regards to relocation.

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Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
Construction	<p>Data collected: Construction information regarding DBE participation for the Annual Title VI Report.</p> <p>Process for collecting: Described in contracting documents (Appendix 1)</p>	Ensure nondiscrimination in contracting. Ensure federally funded projects are reaching their DBE goals.
Maintenance	<p>Data collected: Maintenance information regarding DBE participation for the Annual Title VI Report.</p> <p>Process for collecting: Described in contracting documents (Appendix 1)</p>	Ensure nondiscrimination in contracting.

VI. Title VI Training

In keeping with the adopted City of Bellevue policy of nondiscrimination, departmental procedures will be established or followed for all city employees to have equal access to applicable educational and training opportunities. Transportation staff will maintain program administration documentation and data necessary for the preparation of annual Title VI reports and will routinely supply the necessary data to the Transportation Title VI Coordinator.

A. National Highway Institute (NHI), US Department of Transportation (USDOT), Federal Highway Administration (FHWA), and Washington State Department of Transportation (WSDOT) Education

The Transportation Title VI Coordinator will be notified when training for NHI, USDOT, FHWA, or WSDOT courses or workshops become available to City of Bellevue Transportation employees. The Transportation Department Director will establish a policy for the selection of participants interested in taking part in the NHI, USDOT, FHWA, or WSDOT workshops to ensure that no one is denied participation or subjected to discrimination on the basis of race, color, or national origin. The city's learning management system, the Performing, Learning and Career for Employees (PLaCE), is used as a repository for class attendance for staff as well as individual transcript records. A report can be generated from the PLaCE upon completion of each educational seminar or course throughout the reporting period once attendance is updated in the system. This information is then used in the annual Title VI accomplishment report.

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Title VI Training

The Title VI Coordinators are responsible for overall Title VI-related training and staff development for Title VI Specialists and other City of Bellevue employees. The coordinator and administrator will conduct a minimum of one internal Title VI training session per quarter. The coordinator and administrator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically. WSDOT's Office of Equal Opportunity Internal and External Civil Rights Branch and the Contract Compliance Office may be asked to provide applicable training.

In a partnership between the City of Bellevue Transportation Department Title VI Coordinator and the ADA, Title VI, and Equal Opportunity Officer, a Title VI Employee Training has been developed for all city staff. This training covers the following areas:

- I. Overview of Title VI and The Civil Rights Act of 1964
- II. Title VI Program Expectations
- III. City of Bellevue Diversity Advantage Initiative and the Changing Face of Bellevue
- IV. Mandates Under Title VI for Providing Access to Those with Limited English Proficiency
- V. Title VI and Environmental Justice
- VI. Language Access Resources

This training was designed to be three and a half hours and allows participants to work through many aspects of Title VI compliance through group discussion and self-reflection-centered assignments. Participants are expected to discuss staff responsibilities under Title VI, what cultural competence means to them, and how Title VI connects to the diversity of Bellevue. Participants are also expected to participate in true-false scenarios to solidify their knowledge of Title VI responsibilities. Participants are invited to explore the city's available resources to provide language translation and interpretation, and brainstorm strategies for providing services to people who are protected under the Civil Rights Act.

Selection of Instructors

When necessary, the Coordinator and Administrator will collaborate with the City of Bellevue's Finance and Asset Management department's Procurement Services group to ensure City policy is followed in the selection of instructors for City of Bellevue Transportation training courses/ workshops and ensure equal opportunity in the selection process for all training contracts. Per adopted policy, the City will provide accessibility to Minority/Women/Disadvantaged Business Enterprise consulting and training firms to compete for training contracts.

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Additional training resources

In addition to the Title VI Staff training, staff have access to an internal website that contains many resources for providing language access such as walkthroughs of how to get documents translated, how to hire an interpreter, how to work with an interpreter, how to use telephonic interpretation, how to provide interpretation in a virtual meeting, how to use the city's interpretation headsets, how to use city GIS-based Mapshot Title VI mapping tool to identify demographics for specific project areas, how to collect metrics on public participation in events when applicable, how to walk through the city's four-factor analysis process to identify vital information and the languages that information needs to be translated into, considerations for Environmental Justice (EJ), how to find language access vendors and verify that they are certified, how to provide CART and sign language services.

Staff have access to a playlist of short, 3-5 minute tutorial videos via the PLACE that walk through the following subjects: how to use telephonic interpretation, how to hire an interpreter, how to work with an interpreter effectively, how to go through the four-factor analysis process, how to get documents translated, EJ, interpretation in Zoom and Teams, and how to use the city's interpretation headsets.

Program administration documentation and data

The City of Bellevue uses their own GIS-based Mapshot data, based off demographics from the US Census and American Communities Survey (ACS) and FHWA's Screening Tool for Equity Analysis of Projects (STEAP) to assess project areas for language access need. The City of Bellevue uses voluntary demographics forms to collect demographic data about in-person event attendees and track trends in who is accessing which events or media. In the hybrid environment, we strive to collect demographic data from participants from our on-line platforms by providing a voluntary demographic sign-in sheet.

VII. Title VI Complaint Procedures

The City of Bellevue Title VI complaint procedures and forms have been translated into the top languages meeting the safe harbor threshold for the city. Both the complaint procedures and complaint forms can be found on the ADA/Title VI Resources webpage at BellevueWA.gov. The English versions have been provided below (Title VI Complaint Guidelines) and in the following section (Title VI Complaint Form) as examples.

The Transportation Department has more detailed procedures for complaints about Transportation projects, programs, and facilities. These include the process of requesting the Washington State Department of Transportation (WSDOT) Office of Equal Opportunity conduct the investigation, and the requirement of WSDOT forwarding the complaint to the Federal Highway Administration (FHWA) if the complaint involves a project or program that has received federal financial assistance from FHWA. These procedures are found in Appendix 4.

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In addition, although the majority of the Federal Transit Administration (FTA) funding we receive is as a sub-recipient through King County Metro, we are also responsible for showing our compliance with Title VI by having specific procedures documented for FTA-funded projects and programs. These can be found in the FTA program plan in Appendix 5.

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City of Bellevue Title VI of the Civil Rights Act of 1964 Complaint Guide



A. Overview

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 and related statutes, relating to any program, facility or activity managed by the City of Bellevue. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination or unaccommodated barriers to access. Every effort will be made to resolve complaints informally at the city level. The option of informal mediation meeting(s) between the affected parties and a designated mediator may be utilized for resolution. Intimidation or retaliation of any kind is prohibited by law.

B. Procedures

If you believe that you have not been treated equally because of your race, color, national origin, or limited English proficiency, then you have the right to file a formal complaint with the City of Bellevue.

How to file a complaint

1. Within 180 days of the incident, complete the Title VI Complaint Form. You must answer every question.
2. Submit the complaint as directed on the form. The city will not act on or respond to a complaint made by telephone or in person.

What happens next

1. The city will receive and review the complaint form to determine if additional information is needed and which agency, if any, should further investigate the claim.
2. The city will notify you and the person(s) you identified as being involved in the alleged discrimination of the status of the complaint and, if needed, the process to resolve it. Every effort will be made to resolve complaints informally. Resolution may include informal mediation meetings(s) between you and those you allege were involved. These procedures are part of an administrative process that will not result in the payment of punitive damages or other financial compensation.
3. The person(s) you identified as being involved in the alleged discrimination will have 10 days to respond.
4. Within 60 days of when you filed the complaint, the agency investigating the complaint will prepare a report that includes a description of the incident, who was interviewed, findings and recommendations for resolution. The report will be reviewed and finalized by the City Attorney, in consultation with other city staff.

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5. 15 days after the investigative report is finalized, the city will schedule meetings with you and the person(s) you alleged were involved in the incident. You will be given a copy of the investigative report and will be notified of your right to appeal the findings. These procedures do not deny you the right to file a formal complaint with other state or federal agencies or seek private counsel for complaints alleging discrimination. Intimidation or retaliation against you of any kind is prohibited by law. These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by the City of Bellevue, as well as its sub-recipients, consultants, and contractors.



For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-6168 (voice) or email ADATitleVI@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov.

VIII. Title VI Complaint Form

City of Bellevue
Title VI Complaint Form



If you believe that you have been discriminated against because of your race, color, or national origin (including limited English proficiency), by city programs or activities, you may file a formal complaint by completing this form and sending it by postal mail to:

City of Bellevue
Attn: Human Resource Director
P.O. Box 90012
Bellevue, WA 98009-9012

City of Bellevue Use Only		
Received		
Response		
Report		
Briefing		

Your Name: _____

Phone Number: _____

Best time of day to contact you about this complaint:

☐ 7-10 a.m. ☐ 10 a.m.-1 p.m. ☐ 1-4 p.m. ☐ 4-7 p.m.

Email Address: _____

Mailing Address: _____

Street

City

State

Zip

What was the alleged discrimination based on? Select all applicable:

☐ Race ☐ Color ☐ National Origin (Including limited English proficiency)

Date of alleged incident: _____

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Agency or person(s) responsible for the alleged discrimination:

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

[illegible]

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List any other persons that we should contact for additional information in support of your complaint. Please include their phone numbers, addresses, email addresses, etc.

Name: _____

Phone Number: _____

Email Address: _____

Mailing Address: _____
Street

City State Zip

Name: _____

Phone Number: _____

Email Address: _____

Mailing Address: _____
Street

City State Zip

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List any other agencies with whom you have filed this same complaint:

Name: _____ State: _____

Name: _____ State: _____

Name: _____ State: _____

Name: _____ State: _____

Name: _____ State: _____

Signature (Required)

Date



For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-6168 (voice) or email ADATitleVI@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov.

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IX. Public Participation

Identifying Populations for Outreach

The City of Bellevue identifies minority populations for outreach in several ways. When planning a project, staff are encouraged to use the city GIS-based Mapshot Title VI mapping tool, the FHWA's Screening Tool for Equity Analysis and Projects (STEAP), public information officers, community partners, and data from community meetings and public hearings to identify populations for outreach.

Mapshot Title VI Mapping Tool and FHWA's STEAP

Mapshot is an enterprise-wide GIS-based mapping system. Embedded in that system is the Mapshot Title VI demographic reporting tool that generates a map and demographic data reports for a selected project/program area. Staff can select their project/program area by census block groups on a map, and then generate a demographics report for that area. Included in the demographics report is information on Limited English Proficient (LEP) populations and languages spoken in that area. Staff can then use this data to determine which minority populations are present in the project/program area, who might be most impacted by a project or program, and which groups meet the safe harbor threshold for the translation of vital information. Staff can also see which languages people in the project/program area speak, regardless of whether they meet the threshold. For large projects, staff also use the FHWA STEAP tool to obtain more demographic data related to identifying minority populations for outreach. A sample map and demographics report generated by Mapshot can be found in APPENDIX.

Public Information Officers, Cultural Outreach Assistants, and Community Partners

In addition to these resources, the City of Bellevue has a Chief Communications Officer and Public Information Officers (PIOs) in various departments, including Transportation. These staff members regularly engage with the public to provide information on what the city is working on and provide valuable connections to the public for identifying populations for outreach. The City of Bellevue also has Cultural Outreach assistants who work with various diverse organizations in the community to share information about the City of Bellevue's projects, programs, and events. The city also maintains relationships with partners at various community organizations and communicates with them on outreach needs.

Community Meetings and Public Hearings

To gauge community involvement and determine further outreach needs, staff also collect demographic statistics at applicable community meetings and public hearings. Data will be gathered through use of a voluntary self-reporting form which includes race, gender, and national origin. Completed forms will be provided to the Title VI Coordinator after each meeting. In the hybrid environment, we strive to collect demographic data from participants from our on-line platforms by providing a voluntary demographic sign-in sheet.

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Communication and Outreach with Minority Populations

City of Bellevue staff communicate with and conduct outreach to minority populations through a variety of mediums, including the public-facing website, flyers, public meetings, social media posts, the BellevueTV channel and YouTube channel, and other methods as recommended by PIOs and community leaders.

“Questions”, “Information”, or “Interpreter” icons are to be included on all written public-facing information. These icons have the words “Questions”, “Information”, or “Interpreter” written on them in many languages, with a phone number to the city’s Service First desk that residents can call to receive assistance. If residents, including LEP residents, require interpretation, Service First staff will call in a telephonic interpreter via LanguageLine.

In addition to the icons, all public facing materials include the City of Bellevue’s reasonable modification statement notifying residents of their right to request modification to materials or programs if needed. This statement has been translated into Bellevue’s top languages.

The City of Bellevue also provides “I speak” cards at public-facing service desks. Residents can point to their language on the card, enabling staff to quickly identify the language needed and call an interpreter.

To ensure that public meetings and other outreach events are accessible to all residents, staff should host meetings in a variety of community buildings throughout the city, including those along transit routes. When projects will specifically impact certain minority communities, public events should be hosted within those communities to the best extent possible. This often includes the need to partner with community organizations and leadership.

The City Council also appoints residents to boards, commissions and committees that provide detailed study and recommendations on important policy matters. These groups include the Arts Commission, Civil Service Commission, Environmental Services Commission, Human Services Commission, the Bellevue Library Advisory Board, Parks & Community Services Board, the Planning Commission, the Tourism Promotion Area Advisory Board, and the Transportation Commission. These groups are essential to communication and outreach to different parts of Bellevue’s community. Additional volunteer panels appointed by the City Council or City Manager that support communication and outreach with minority communities include the Bellevue Diversity Advisory Network (BDAN), Bellevue Network on Aging, and Bellevue Youth Link.

In addition to the boards, commissions, and committees appointed by the council, the city also supports seven police advisory councils. These advisory councils reflect the diverse communities that call Bellevue home and are essential to communication, outreach, and engagement with minority populations. The seven advisory councils include African

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American, Muslim, Latino/Latina, LGBTQI+, Interfaith, Asian/Pacific Islander, and South Asian advisory councils.

The goal of the advisory councils is to strengthen the relationship between the department and the community through trust, respect, and mutual understanding. Advisory council members provide input and feedback on police initiatives and major incidents, helping to ensure that police meet the needs of all the Bellevue communities, especially minority communities. They also collaborate with the police department on projects, provide guidance on best practices and approaches, help to identify barriers that exist between police officers and members of the community and develop strategies to eliminate those barriers.

Consideration of input from minority populations

Staff have been trained in both the four-factor analysis and environmental justice processes the city has developed to ensure nondiscrimination throughout the duration of a project. Staff have been trained in identifying populations for outreach and then going to those communities and soliciting input on projects throughout the planning process. Outreach is conducted through any number of the methods described above.

X. Limited English Proficiency

Four Factor Analysis and Vital Information

City of Bellevue staff use the four-factor analysis process to identify vital information as defined by the Department of Justice. All City of Bellevue staff should receive training on identifying vital information. Staff then use the Mapshot mapping tool to generate a Title VI demographics report for their project area, and using the data and the safe harbor threshold, as well as knowledge about which communities may frequently encounter project information, identify which languages vital information should be translated into. Further information on the city's four-factor analysis process can be found in Appendix 1.

To determine which languages vital information needs to be translated into for a given project area, staff follow the four-factor analysis process and use the Mapshot mapping tool to generate the necessary Title VI demographics report. Mapshot's language data is sourced from the Public Use Microdata Areas (PUMA) data blocks that are generated each year by the Census Bureau. For the city, as a whole, PUMA data is used every five years to update the city-wide languages meeting the safe harbor threshold.

Staff Training

Staff who have been working at the city for more than six months are required to take the Title VI training course described in Section VI. Staff are taught how to use language access resources within the city, and how to provide language services to the public if needed. All staff, if class space is available, must take the Title VI training within one year of hire. The classes are currently offered monthly. Some departments may require staff to take the

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training more than once to refresh staff knowledge and to learn any new concepts or requirements that have taken place since they last took the class.

XI. Environmental Justice

To prevent, mitigate, and correct the possible high and adverse disproportionate burdens or environmental impacts of city programs and policies on minority and/or low-income populations, the City of Bellevue employs the procedures and practices outlined in the Environmental Justice plan in Appendix 2.

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Exhibit 1: Notice of Title VI Rights

The City of Bellevue provides the Notice of Title VI Rights on the public-facing website under ADA/Title VI Notices, as well as in all public-facing project information for projects receiving federal funds. This notice is provided in all eight languages meeting the safe harbor threshold in Bellevue. The text of the notice is as follows:

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

The City of Bellevue hereby gives public notice that it is the City's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin (including limited English proficiency) be excluded from the participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Federal Aid Highway program or other activity for which the City of Bellevue receives federal financial assistance.

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 Bellevue. Any such complaint must be in writing and filed with the City of Bellevue's Human Resources Director within 180 days following the date of the alleged discriminatory occurrence.

Title VI Discrimination Complaint Forms may be obtained through the City's website (www.bellevuewa.gov) or from the City of Bellevue Human Resources Director at no cost to the complainant. To file a Title VI discrimination complaint, contact:

City of Bellevue

Attn: Human Resources Director

PO Box 90012, Bellevue, WA 98009-9012

450 110th Avenue NE, Bellevue, WA 98004

ADATitleVI@bellevuewa.gov

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Exhibit 2 – City of Bellevue Title VI Assurances

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination Assurances **DOT Order No. 1050.2A**

The City of Bellevue (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Washington State Department of Transportation (WSDOT), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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, "for which the Recipient receives Federal financial assistance from DOT, including the Washington State Department of Transportation.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

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Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The City of Bellevue, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases,

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licenses, permits, or similar instruments entered into by the Recipient with other parties:

- a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regards to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, City of Bellevue also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Washington Department of Transportation access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Washington Department of Transportation. You must keep records, reports, and submit the material for review upon request to Washington Department of Transportation, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

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City of Bellevue gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration. This ASSURANCE is binding on Washington State Department of Transportation, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal-Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

City of Bellevue
(Name of Recipient)

by

DocuSigned by:
Diane Carlson
7CB8C27856F040D...

(Signature of Authorized Official)

4/11/2024 | 4:22 PM PDT

DATED

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APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Washington State Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non- discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Washington State Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Washington State Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non- discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Washington State Department of Transportation may determine to be appropriate, including, but not limited to:

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- a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Washington State Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

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APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the City of Bellevue will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Washington State Department of Transportation, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the City of Bellevue all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto City of Bellevue and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the City of Bellevue, its successors and assigns.

The City of Bellevue, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the City of Bellevue will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above- mentioned non-discrimination conditions, the Department will have a

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right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

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APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the City of Bellevue pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non- discrimination covenants, City of Bellevue will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the City of Bellevue will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the City of Bellevue and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

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APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by City of Bellevue pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non- discrimination covenants, City of Bellevue will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, City of Bellevue will there upon revert to and vest in and become the absolute property of City of Bellevue and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

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APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non- discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;

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- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

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Appendix 1 – Limited English Proficiency (LEP) Plan

City of Bellevue

Limited English Proficiency (LEP) Plan

Part of the City of Bellevue Title VI Plan

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City of Bellevue Title VI Plan – March 2024

Introduction:

As a recipient of Federal funds, the City of Bellevue is required to follow certain federal regulations. Consequently, the City of Bellevue Department of Transportation has laid out this LEP (Limited English Proficiency) plan to ensure compliance with both Title VI of the Civil Rights Act of 1964 concerning access to services for people with limited English proficiency. It also responds to Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, which directs recipients of federal funding to take reasonable steps to ensure that people with limited English proficiency have meaningful access to their programs and activities.

This plan will also help the City of Bellevue's Transportation department comply with the King County executive order INF 14-2 (AEO) on Written Language Translation Process.

Plan Summary:

This LEP plan consists of two primary components: A federally mandated Four Factor Analysis, as well as an implementation plan. Four Factor Analysis consists of the following four considerations:

1. *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*
2. *The frequency with which LEP persons come into contact with the program.*
3. *The nature and importance of the program, activity, or service provided by the program to people's lives.*
4. *The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

The implementation plan consists of the specific steps and measures that will be taken to outreach and provide services to LEP individuals. The implementation plan details how language assistance will be provided by the City of Bellevue, how individuals will be notified about said language assistance, how staff will be trained to follow the newly implemented guidelines, and how the plan will be modified and updated over time.

Legal Basis:

This plan is legally mandated by Title VI of the Civil Rights Act of 1964, as well as Executive Order #13166 passed on August 11, 2000. A copy of Executive Order 13166 is available in Appendix B.

City of Bellevue Title VI Plan – March 2024

Part I: Results of Four Factor Analysis:

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient:

To determine the number of LEP individuals in the City of Bellevue, the city utilizes tools provided by the United States Census Bureau and the Bellevue School District to identify persons who have another primary language other than English. The Department analyzed demographics data from two locations: The latest 5-year ACS (American Communities Survey) PUMA estimates and the Bellevue School District's records on students enrolled in ELL programs. An excerpt of the data is below:

Bellevue School District			US Census ACS	
Rank	Language	Number of ELL Students	Language	Number who "speak English less than very well"
1	Spanish	1,138	Chinese (incl. Mandarin/Unspecified)	7,270
2	Chinese-Mandarin	339	Spanish	2,695
3	Chinese-Unspecified	196	Korean	1,663
4	Russian	189	Japanese	1,292
5	Korean	140	Russian	1,228
6	Japanese	113	Vietnamese	856
7	Telugu	102	Telugu	743
8	Arabic	70	Hindi	689
9	Hindi	66	Tamil	521
10	Vietnamese	65	Chinese - Cantonese	446

Additionally, the City of Bellevue has relied on the Federal Highway Administration's Screening Tool for Equity Analysis of Projects (STEAP) and Title VI tools like the enterprise-wide GIS-based tool, Mapshot that uses census block groups and ACS data, to generate demographics reports for program/project areas in Bellevue to identify which parts of Bellevue meet or exceed the 'safe harbor' threshold of 1,000 people or 5%+ of the population. Sample reports from both Mapshot and STEAP can be found in appendix D.

Factor 2: The frequency with which LEP persons come into contact with the program:

The City of Bellevue does not currently possess information specifically relating to the frequency of interactions between LEP individuals and their staff or programs as it relates to the Transportation Department or any other department. The City has been able to use procurement data to see how often translation or interpretation services have been paid for and can track data on the use of Language Line as a method of communication with staff and LEP individuals.

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Factor 3: The nature and importance of the program, activity, or service provided by the program:

The City of Bellevue provides many services which are of relevance to LEP individuals. Specifically, the Transportation Department holds open house meetings and invites members of the public to comment on proposed projects and their effects. Language Access concerns must be considered to ensure equal access to services and voice in these and other meetings. Additionally, the city trains all staff in reviewing their projects for vital information and providing language access as needed or required.

Factor 4: The resources available and costs to the recipient:

In carrying out the policies outlined in Section II of this Language Access plan, the City of Bellevue has available to it the services of state contract Dynamic Language and Prisma, as well as other companies vetted by the city for their services, for language text translation. The City of Bellevue also contracts with Language Line assistance to provide over-the phone interpreter services that can be utilized by all departments. The plan is estimated to cost a total of \$130,000 annually, which is paid from the various departmental budgets that utilize the services.

A handout outlining the city's four-factor analysis process can be found in Appendix C.

Planned/ongoing actions:

- Planned and ongoing actions to ensure compliance with Title VI and provision of equal access for LEP populations are outlined in departmental Title VI workplans. The following are some examples:
 - o Translation of public-facing webpages and other information,
 - o Train departmental staff on Title VI,
 - o Development of standard operating procedures where applicable to ensure consistent access to language services such as an interpreter at Probation or City Council, Boards, and Commissions meetings,
 - o Inclusion of updated reasonable modification statement on public-facing materials.

Part II: Implementation Plan:

Identifying LEP Individuals:

The data assembled in the above Four-Factor analysis indicates that Spanish and Mandarin Chinese are by far the most prevalent of the non-English languages spoken in Bellevue.

The data further indicates that the languages of Russian, Korean, Vietnamese, Japanese, Hindi, Telugu, Tamil, and Cantonese are also prominent minority languages in Bellevue.

The data from US Census and American Communities Survey indicates that there are census tracts in Bellevue which meet the 'Safe harbor' thresholds for Spanish, "Indo-European", and "Asia/Pacific Islander" language groups. While these categories are quite broad, the data serves to corroborate the more specific demographic data presented in Factor One.

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Language Assistance Measures:

- Telephonic interpretation
- In-person interpretation
- Translation of vital information
- Fulfilling reasonable modification requests for translation or interpretation

Staff Training:

Based on the language distribution data summarized above, and consistent with King County's Executive Order on Written Translation, the City of Bellevue will translate public communication materials and vital documents into Spanish when needed. The City of Bellevue will translate materials into the other commonly spoken non-English languages when those are the primary language spoken by 1,000 individuals or 5 percent or more of the target audience.

The City of Bellevue will use alternative forms of language assistance when the alternative is more effective or practical. All public facing documents will have an accommodation statement on them, so individuals know that they can request language assistance for the related project, program, or event. This allows people to call and request an interpreter, if needed. Another alternative is to include a summary of a communication piece in Spanish and other languages as relevant and offering a full translation upon request.

Notifying Customers:

A variety of methods for providing notice have been described earlier in this plan. Key methods include the multi-language "Interpretation" graphics that are printed on neighborhood outreach mailers. A reasonable modification statement notifying residents of their right to request reasonable modification is also included on public-facing materials.

Monitoring, Evaluating, and Updating the LEP Plan:

The City of Bellevue will annually assess the effectiveness of this LEP Plan and update it as appropriate. The assessment will include reviewing the use of language assistance measures, reviewing survey data, and speaking with staff members who interact with people who do not speak English well on process improvements and best practices.

The City of Bellevue will work with the city demographer, who is housed in the Community Development Department, to maintain up-to-date data about populations that may need language assistance.

The City of Bellevue will further ensure that data on LEP populations from sources such as the Bellevue School District are current and reflect current LEP populations.

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Appendix A:

Full tables of data gathered from the Bellevue School District, US Census American Communities Survey:

Bellevue School District: Number of Multilanguage Learners (MLL) Students by Language:

Language	# of Students	Language	# of Students
Spanish	1138	Bengali	6
Chinese-Mandarin	339	Dari	6
Chinese-Unspecified	196	Kinyarwanda	6
Russian	189	Persian	6
Korean	140	Samoa	6
Japanese	113	Albanian	5
Telugu	102	Cambodian	5
Arabic	70	German	5
Hindi	66	Oromo	5
Vietnamese	65	Danish	4
Chinese Cantonese	64	Finnish	4
Tamil	46	Gujarati	4
Amharic	37	Indonesian	4
Ukrainian	36	Polish	4
Farsi	34	Wolof	4
Punjabi	31	Azerbaijani	3
Urdu	25	Armenian	3
Mongolian	23	Catalan	3
Hebrew Modern	22	Italian	3
French	19	Kurdish	3
Kannada	19	Marshallese	3
Marathi	19	Odia	3
Portuguese	18	Bulgarian	2
Swahili	18	Chinese Taiwanese	2
Thai	14	Dutch	2
Somali	13	Kirgiz	2
Turkish	13	Swedish	2
Romanian	12	Saraiki	2
Malayalam	11	Tigrinya	2
Bosnian	8	Tulu	2
Nepali	8	Amer Sign Lang	1
Pashto	8	Bisaya	1
Khmer	7	Chinese-Fukienese	1

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Language	# of Students
Fula	1
Greek Modern	1
Hungarian	1
Kirundi	1
Lao	1
Lithuanian	1
Marwari	1
Maya-Quiche	1

Language	# of Students
Nyanja	1
Norwegian	1
Pilipino	1
Serer -Sine	1
Tamazight	1
Taishanese	1
Uzbek	1

US Census: American Communities Survey: Number of people who “Speak English Less Than Very Well”:

Language Name	# of Residents
Chinese	7,270
Spanish	2,695
Korean	1,663
Japanese	1,292
Russian	1,228
Vietnamese	856
Telugu	743
Hindi	689
Tamil	521
Thai	497
Cantonese	446
Romanian	358

Language Name	# of Residents
French	281
Arabic	258
Marathi	247
Min Nan Chinese	216
Farsi	198
Nepali	183
Tagalog	128
Gujarati	119
Ukrainian	98
Bosnian	75
Bengali	64
Turkish	47

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Appendix B:
Copy of Executive Order 13166: Improving Access to Services for Persons With Limited English Proficiency:

50121	
Federal Register	Presidential Documents
Vol. 65, No. 159	
Wednesday, August 16, 2000	
Title 3—	Executive Order 13166 of August 11, 2000
The President	Improving Access to Services for Persons With Limited English Proficiency
<p>By the authority vested in me as President by the Constitution and the laws of the United States of America, and to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP), it is hereby ordered as follows:</p> <p>Section 1. Goals.</p> <p>The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English language. The Federal Government is committed to improving the accessibility of these services to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. To this end, each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. Each Federal agency shall also work to ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their LEP applicants and beneficiaries. To assist the agencies with this endeavor, the Department of Justice has today issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. As described in the LEP Guidance, recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.</p> <p>Sec. 2. Federally Conducted Programs and Activities.</p> <p>Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans.</p> <p>Sec. 3. Federally Assisted Programs and Activities.</p> <p>Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order,</p>	

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50122 Federal Register / Vol. 65, No. 159 / Wednesday, August 16, 2000 / Presidential Documents

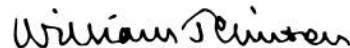
each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its guidance document in the **Federal Register** for public comment.

Sec. 4. Consultations.

In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.

Sec. 5. Judicial Review.

This order is intended only to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person.



THE WHITE HOUSE,
August 11, 2000.

[FR Doc. 00-20936
Filed 8-15-00; 8:45 am]
Billing code 3195-01-P

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Appendix C: Four-factor analysis handout

Going Further

While Limited English Proficiency requirements are mandated by state and federal law, strict compliance with the law should not be our only goal as a culturally competent organization. Above all, we should work at all times towards creating a city accessible to all people regardless of race, ability, or national origin. As you prepare to interact with city residents, keep the needs of Limited English Proficient individuals in mind, not just because it is the law, but because it is the **right thing to do**.

The graphics displayed below can be a simple way to increase the accessibility of documents for public release.

Please go to BellevueWA.gov/logos-photos to download graphic symbols below and to reference COB Style Guide for size requirements, or contact graphics@bellevuewa.gov



For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-6168 (voice) or email bamson@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov.



Title VI and Limited English Proficiency Four Factor Analysis

What is LEP?

Under state and federal law, the City of Bellevue is required to:

1. Examine the services it provides.
2. Identify any need for services to those with limited English proficiency (LEP).
3. Develop a process to provide LEP persons with equal access to those services.

What is Four-Factor Analysis?

To help determine which LEP services are needed, federal laws and guidelines have established four factors for organizations to use. This guide explains these factors and how they may be used by you or your team to help the city meet the needs of residents and fulfill its responsibilities under the law.

Four-Factor Analysis

Four Factor Analysis is the way we assess where and why language assistance measures may be needed.

"Safe harbor" threshold:
1000 people or 5% of given population, whichever is lower.

Factor One—Determine the number and proportion of LEP persons served or encountered in the service area. To address this factor, we research data related to the prevalence of languages spoken in Bellevue by LEP individuals. The "safe harbor" threshold states that if a language is spoken by either five percent or 1,000 individuals, whichever is less, then vital documents must be translated for it.

Factor Four—Determine the resources available to the recipient and costs. While meeting the needs of our LEP population regardless of cost is always required, the best resources will often vary depending on the situation.

Translators reproduce material written or printed in one language into one or more other languages.

Interpreters reproduce a statement spoken in a given language by speaking in one or more other languages.

In some situations, it is best to provide translations of copies of documents. In others, interpretation of a resident's spoken words may be more applicable.

Some Available Language Access Resources:

- Language Line
- Interpretation Headsets
- Communication Access Real Time Transcription (CART)
- Recommended Vendors List

Most common languages in Bellevue:

- Chinese (Traditional) (CHT)
- Chinese (Simplified) (CHS)
- Spanish (ES)
- Vietnamese (VI)
- Japanese (JA)
- Korean (KO)
- Russian (RU)

Factor Two—Determine the frequency with which LEP individuals come into contact with programs, activities, services. Figure out who is in the neighborhood, what languages are spoken in the community, and how city services might be used by the population.

Vital Documents

Documents are considered "vital" if they "contain information that is critical for obtaining federal services and/or benefits, or is required by law."

Vital Documents include:

- Applications
- Consent and complaint forms
- Notices of rights
- Notices advising LEP persons of the availability of free language assistance
- Notices for city projects, programs, and events.

Factor Three—Determine the importance to LEP persons of your program, activities, and services. A key factor in determining if a document ought to be translated is determining its importance to LEP individuals. Ask yourself "if a non-English speaker could not understand this document, what could the consequences be?"

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Appendix D: Sample Mapshot report

Title VI Demographics Report

Project Name: NW Bellevue Walkways - Mapshot sample

Report Date: Dec 7, 2023

About

This is a demographic report providing data as it relates to Title VI information. Based on census block group boundaries selected, this report displays demographic details in order to provide better communication and services to those impacted by the project.*

Note: Red text in the reports below indicate that a Safe Harbor threshold has been exceeded. The calculations are based on the Safe Harbor Threshold of 5% or 1,000** individuals, whichever is less, in a block group area.

* See appendix at the end of this report for explanations to help understand the categories and how to apply the data.

** For categories that group by households, the threshold is 417 households, which is equivalent to 1000 individuals, based on an estimated average of 2.4 people per household.

Block Group(s) Selected:

530330240012, 530330240021, 530330240023

Race & Ethnicity Information									
Population									
Block Group	Population	American Indian / Alaskan Native	Asian	Black	Hispanic	Native Hawaiian / Pacific Islander	Other Race	Two or More Races	White
530330240012	1406	0	702	0	0	0	48	0	656
530330240021	1368	0	684	12	2	0	0	40	630
530330240023	1735	0	940	0	23	0	0	16	756
Totals	4509	0	2326	12	25	0	48	56	2042

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Percentages

Block Group	American Indian / Native	Asian	Black	Hispanic	Native Hawaiian / Pacific Islander	Other Race	Two or More Races	White
530330240012	0%	49.9%	0%	0%	0%	3.4%	0%	46.7%
530330240021	0%	50%	0.9%	0.1%	0%	0%	2.9%	46.1%
530330240023	0%	54.2%	0%	1.3%	0%	0%	0.9%	43.6%
Totals	0%	51.59%	0.27%	0.55%	0%	1.06%	1.24%	45.29%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Limited English Proficiency Information**Population (Households)**

Block Group	Asian American / Pacific Islander	Indo-European	Other Languages	Spanish
530330240012	168	45	0	0
530330240021	148	15	0	0
530330240023	194	162	0	12
Totals	510	223	0	12

Percentages (Households)

Block Group	Asian American / Pacific Islander	Indo-European	Other Languages	Spanish
530330240012	36.52%	10%	0%	0%
530330240021	30.9%	3.13%	0%	0%
530330240023	32.83%	27.41%	0%	2.03%
Totals	33.33%	14.58%	0%	0.78%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Report Source: This report was generated in Mapshot.

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Top 5 Spoken Languages Information

See appendix for guidance on how to use this information.

Block Group	Top Most Spoken Language	Second Most Spoken Language	Third Most Spoken Language	Fourth Most Spoken Language	Fifth Most Spoken Language	Elementary School Attendance Areas
530330240012	Chinese-Mandarin	Korean	Chinese-Unspecified	Japanese	Spanish	CLYDE HILL
530330240021	Chinese-Mandarin	Chinese-Unspecified	Russian	Korean	Spanish	CLYDE HILL, MEDINA, ENATAI
530330240023	Chinese-Mandarin	Korean	Chinese-Unspecified	Japanese	Spanish	CLYDE HILL

Data Source: City of Bellevue Demographer based on 2019 American Community Survey and Bellevue School District data from the 2020-2021 school year.

Disability Information

Note that disability counts are not available at the block group level, so there is no "Population" section for this report. If more than one block group is chosen, the statistics may be the same, due to using the census tract information.

Percentages

Block Group	Any Disability	Cognitive Disability	Hearing Disability	Individual Living	Self-Care Disability	Vision Disability	Walking Disability
530330240012	8.83%	3.84%	5.57%	3.49%	0%	4.05%	3.81%
530330240021	7.5%	2.58%	3.61%	2.68%	1.66%	0.12%	2.85%
530330240023	7.5%	2.58%	3.61%	2.68%	1.66%	0.12%	2.85%
Totals	7.92%	2.97%	4.22%	2.93%	1.14%	1.35%	3.15%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Age Information

Note that safe harbor thresholds are only calculated for the '65 or More' category, as this is the group that is considered older adults.

Population

Block Group	Under 5	5-17	18-24	25-34	35-44	45-64	65 or More
530330240012	9	347	120	37	250	361	282
530330240021	0	280	106	29	140	555	258

Report Source: This report was generated in Mapshot.

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530330240023	233	421	72	193	538	183	95
Totals	242	1048	298	259	928	1099	635

Percentages

Block Group	Under 5	5-17	18-24	25-34	34-44	45-64	65 or More
530330240012	0.64%	24.68%	8.53%	2.63%	17.78%	25.68%	20.06%
530330240021	0%	20.47%	7.75%	2.12%	10.23%	40.57%	18.86%
530330240023	13.43%	24.27%	4.15%	11.12%	31.01%	10.55%	5.48%
Totals	5.37%	23.24%	6.61%	5.74%	20.58%	24.37%	14.08%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Poverty Information

Population ('Pop. in Poverty' is a count, others fields show households data)

Block Group	Population in Poverty	Income Under \$35,000	Income Between \$35,000 & \$49,000	Income Between \$50,000 & \$99,000	Income Between \$100,000 & \$124,000	Income of \$125,000 or More
530330240012	80	75	0	29	17	339
530330240021	11	0	42	50	12	375
530330240023	221	39	19	51	112	370
Totals	312	114	61	130	141	1084

Percentages ('Pop. in Poverty' is a count, others fields show households data)

Block Group	Population in Poverty	Income Under \$35,000	Income Between \$35,000 & \$49,000	Income Between \$50,000 & \$99,000	Income Between \$100,000 & \$124,000	Income of \$125,000 or More
530330240012	5.69%	16.3%	0%	6.3%	3.7%	73.7%
530330240021	0.8%	0%	8.77%	10.44%	2.51%	78.29%
530330240023	12.74%	6.6%	3.21%	8.63%	18.95%	62.61%
Totals	6.92%	7.45%	3.99%	8.5%	9.22%	70.85%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Report Source: This report was generated in Mapshot.

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Education Information

Population

Block Group	No High School Degree	High School Degree	Some College	Associates Degree	Bachelors Degree	Advanced Degree
530330240012	0	122	98	117	338	255
530330240021	50	27	122	14	400	369
530330240023	13	38	64	0	351	543
Totals	63	187	284	131	1089	1167

Percentages

Block Group	No High School	High School	Some College	Associates Degree	Bachelors Degree	Advanced Degree
530330240012	0%	13.12%	10.54%	12.58%	36.34%	27.42%
530330240021	5.09%	2.75%	12.42%	1.43%	40.73%	37.58%
530330240023	1.29%	3.77%	6.34%	0%	34.79%	53.82%
Totals	1.4%	4.15%	6.3%	2.91%	24.15%	25.88%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

Vehicle Ownership

Population and Percentages (Households)

Block Group	Households with No Vehicle	% Households with No Vehicle
530330240012	0	0%
530330240021	30	6.26%
530330240023	11	1.86%
Totals	41	2.68%

Data Source: 2017-2021 American Community Survey (ACS) 5-Year Estimates

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Appendix

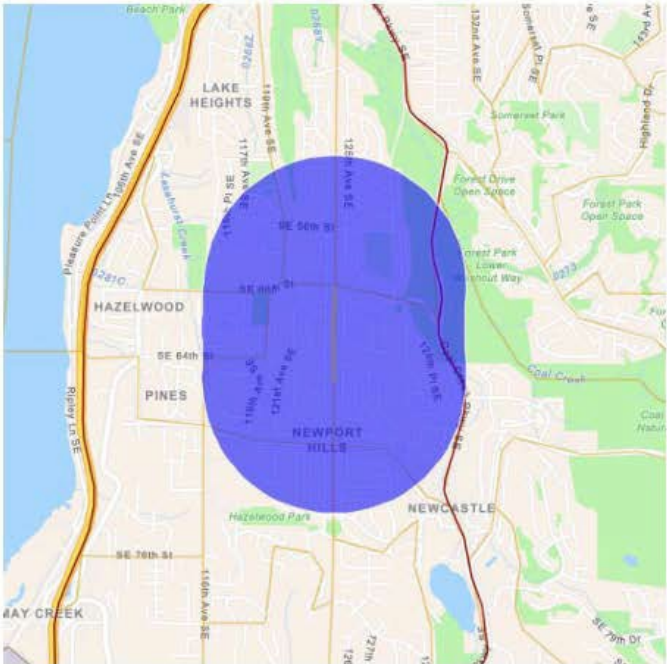
Race/Ethnicity:	Provides general information about the race and/or ethnicity of the people in the selected area.
Limited English Proficiency:	People (over the age of 5) who speak, write, read, or understand English less than well or not at all. This attribute helps with knowing if translation or interpretation may be needed.
Top Five Languages Spoken in the Home:	Helps to understand what languages may be needed for translation or interpretation based on the limited English proficiency data. If more than one block group was chosen, look at all choices to see the most common languages or consult your Title VI Core Team member.
Disability Information:	Use when considering accommodations for meetings, input from the public, i.e., surveys, accessibility of outreach materials.
Age Information:	Use for recognition of older adult (over 65) information. Make sure graphics and fonts are large enough. That meeting accommodations and solicitation for feedback doesn't leave people out. Example: Not all older adults have a smart phone to scan QR codes or not everyone has a computer for a survey.
Poverty Information:	Use for recognition of ability to respond and participate in outreach activities. Lower income persons may work more than one job, may not have a computer, may need program or project services more in their area because their voices are not being heard or they are not the loudest in the room.
Education Information	Based off data from people 25 years +. Use to understand if the information you are sharing will be understood. Keep your phrasing in easy-to-understand statements.
Vehicle ownership:	Helps to understand the people using the transportation system and the accommodations they may need. Example: Zero vehicle households may want more non-motorized accommodations available where they live.

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Appendix E: Sample Screening Tool for Equity Analysis of Projects (STEAP) report

Screening Tool for Equity Analysis of Projects (STEAP)
Project Buffer Analysis Profile Report

Data Source: American Community Survey 2017-2021
Prepared by FHWA Office of Planning



Buffer Area: 1.15 square miles
Disadvantaged Area: 0.0 square miles
Percent Area Disadvantaged: 0.0%
Estimated Disadvantaged Population: 0

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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1.15 Sq Mile Buffer Analysis Summary Report

Due to rounding, counts may not add up exactly to 100%

	Buffer Estimates	Percent
Sex		
Total:	6,200	100.0%
Male:	3,208	51.7%
Female:	2,992	48.3%
Race		
Total:	6,200	100.0%
White alone	2,990	48.2%
Black or African American alone	223	3.6%
American Indian and Alaska Native alone	< 5	0.0%
Asian alone	1,694	27.3%
Native Hawaiian and Other Pacific Islander alone	6	0.1%
Some other race alone	169	2.7%
Two or more races:	1,118	18.0%
Two races including Some other race	888	79.4%
Two races excluding Some other race, and three or more races	230	20.6%
American Indian And Alaska Native Alone Or In Combination With One Or More Other Races		
Total:	47	100.0%
American Indian And Alaska Native (AIAN) Alone Or In Any Combination By Selected Tribal Groupings*		
Total Groups Tallied:	83	100.0%
American Indian tribes, specified:	72	86.8%
Cherokee	< 5	0.0%
Chippewa	36	50.0%
Navajo	0	0.0%
Sioux	0	0.0%
Hispanic Or Latino Origin By Specific Origin*		
Total:	6,200	100.0%
Not Hispanic or Latino	4,956	79.9%
Hispanic or Latino:	1,244	20.1%
Mexican	1,109	89.1%
Puerto Rican	57	4.6%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
Cuban	8	0.6%
Dominican (Dominican Republic)	0	0.0%
Central American:	< 5	0.4%
South American:	23	1.8%
Other Hispanic or Latino:	43	3.5%
Hispanic Or Latino Origin By Race		
Total:	6,200	100.0%
Not Hispanic or Latino:	4,956	79.9%
White alone	2,681	54.1%
Black or African American alone	223	4.5%
American Indian and Alaska Native alone	< 5	0.0%
Asian alone	1,694	34.2%
Native Hawaiian and Other Pacific Islander alone	6	0.1%
Some other race alone	124	2.5%
Two or more races:	229	4.6%
Hispanic or Latino:	1,244	20.1%
White alone	310	24.9%
Black or African American alone	0	0.0%
American Indian and Alaska Native alone	0	0.0%
Asian alone	0	0.0%
Native Hawaiian and Other Pacific Islander alone	0	0.0%
Some other race alone	45	3.6%
Two or more races:	890	71.5%
Nativity*		
Total:	6,200	100.0%
Native:	4,364	70.4%
Foreign born:	1,837	29.6%
Vehicle Availability*		
Total:	2,028	100.0%
No vehicle available	54	2.6%
1 vehicle available	486	24.0%
2 vehicles available	926	45.7%
3 vehicles available	350	17.3%
4 or more vehicles available	212	10.4%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
Household Type For Children Under 18 Years In Households (Excluding Householders, Spouses, And Unmarried Partners)*		
Total:	1,594	100.0%
Married-couple household	1,474	92.5%
Cohabiting couple household	13	0.8%
In male householder, no spouse/partner present household	19	1.2%
In female householder, no spouse/partner present household	88	5.5%
Household Type (Including Living Alone)		
Total:	2,028	100.0%
Family households:	1,536	75.8%
Married-couple family	1,327	86.4%
Other family:	209	13.6%
Nonfamily households:	491	24.2%
Householder living alone	380	77.2%
Householder not living alone	112	22.8%
Household Type By Household Size		
Total:	2,028	100.0%
Family households:	1,536	75.8%
2-person household	624	40.6%
3-person household	259	16.9%
4-person household	416	27.1%
5-person household	120	7.8%
6-person household	74	4.8%
7-or-more person household	43	2.8%
Nonfamily households:	491	24.2%
1-person household	380	77.2%
2-person household	103	21.0%
3-person household	9	1.7%
4-person household	0	0.0%
5-person household	0	0.0%
6-person household	0	0.0%
7-or-more person household	0	0.0%
Educational Attainment For The Population 25 Years And Over		
Total:	4,052	100.0%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
No schooling completed	62	1.5%
Nursery school	0	0.0%
Kindergarten	0	0.0%
1st grade	0	0.0%
2nd grade	0	0.0%
3rd grade	0	0.0%
4th grade	0	0.0%
5th grade	0	0.0%
6th grade	< 5	0.1%
7th grade	6	0.1%
8th grade	33	0.8%
9th grade	5	0.1%
10th grade	6	0.2%
11th grade	0	0.0%
12th grade, no diploma	59	1.5%
Regular high school diploma	260	6.4%
GED or alternative credential	30	0.8%
Some college, less than 1 year	87	2.1%
Some college, 1 or more years, no degree	383	9.5%
Associate's degree	317	7.8%
Bachelor's degree	1,755	43.3%
Master's degree	906	22.4%
Professional school degree	83	2.1%
Doctorate degree	55	1.4%
Poverty Status In The Past 12 Months By Sex*		
Total:	6,181	100.0%
Income in the past 12 months below poverty level:	673	10.9%
Male:	389	57.8%
Female:	284	42.3%
Income in the past 12 months at or above poverty level:	5,508	89.1%
Male:	2,831	51.4%
Female:	2,676	48.6%
Poverty Status In The Past 12 Months By Age*		
Total:	6,181	100.0%
Income in the past 12 months below poverty level:	673	10.9%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
Under 6 years	198	29.5%
6 to 11 years	66	9.8%
12 to 17 years	137	20.3%
18 to 59 years	192	28.5%
60 to 74 years	64	9.5%
75 to 84 years	8	1.2%
85 years and over	8	1.2%
Income in the past 12 months at or above poverty level:	5,508	89.1%
Under 6 years	348	6.3%
6 to 11 years	427	7.7%
12 to 17 years	400	7.3%
18 to 59 years	2,945	53.5%
60 to 74 years	1,025	18.6%
75 to 84 years	246	4.5%
85 years and over	118	2.1%
Age By Disability Status*		
Total:	6,195	100.0%
Under 19 years:	1,633	26.4%
With a disability:	36	2.2%
No disability:	1,597	97.8%
19 to 64 years:	3,528	57.0%
With a disability:	286	8.1%
No disability:	3,241	91.8%
65 years and over:	1,035	16.7%
With a disability:	237	22.9%
No disability:	797	77.0%
Household Income In The Past 12 Months (In 2021 Inflation-Adjusted Dollars)		
Total:	2,028	100.0%
Less than \$10,000	31	1.5%
\$10,000 to \$14,999	81	4.0%
\$15,000 to \$19,999	18	0.9%
\$20,000 to \$24,999	10	0.5%
\$25,000 to \$29,999	24	1.2%
\$30,000 to \$34,999	30	1.5%
\$35,000 to \$39,999	78	3.9%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
\$40,000 to \$44,999	54	2.7%
\$45,000 to \$49,999	11	0.5%
\$50,000 to \$59,999	84	4.1%
\$60,000 to \$74,999	123	6.0%
\$75,000 to \$99,999	154	7.6%
\$100,000 to \$124,999	166	8.2%
\$125,000 to \$149,999	171	8.4%
\$150,000 to \$199,999	384	19.0%
\$200,000 or more	610	30.1%
Veteran Status For The Civilian Population 18 Years And Over*		
Total:	4,603	100.0%
Veteran	200	4.3%
Nonveteran	4,404	95.7%
Employment Status For The Population 16 Years And Over		
Total:	4,539	100.0%
In labor force:	2,887	63.6%
Civilian labor force:	2,885	99.9%
Armed Forces	< 5	0.1%
Not in labor force	1,652	36.4%
Gross Rent As A Percentage Of Household Income In The Past 12 Months		
Total:	589	100.0%
Less than 10.0 percent	9	1.6%
10.0 to 14.9 percent	45	7.6%
15.0 to 19.9 percent	64	10.8%
20.0 to 24.9 percent	90	15.3%
25.0 to 29.9 percent	67	11.4%
30.0 to 34.9 percent	15	2.6%
35.0 to 39.9 percent	55	9.3%
40.0 to 49.9 percent	23	3.9%
50.0 percent or more	187	31.8%
Not computed	34	5.8%
Mortgage Status By Selected Monthly Owner Costs As A Percentage Of Household Income In The Past 12 Months		
Total:	1,439	100.0%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
Housing units with a mortgage:	922	64.1%
Less than 10.0 percent	60	6.5%
10.0 to 14.9 percent	77	8.3%
15.0 to 19.9 percent	244	26.4%
20.0 to 24.9 percent	161	17.5%
25.0 to 29.9 percent	166	18.0%
30.0 to 34.9 percent	76	8.2%
35.0 to 39.9 percent	30	3.3%
40.0 to 49.9 percent	42	4.5%
50.0 percent or more	67	7.3%
Not computed	0	0.0%
Housing units without a mortgage:	516	35.9%
Less than 10.0 percent	303	58.7%
10.0 to 14.9 percent	56	10.8%
15.0 to 19.9 percent	58	11.3%
20.0 to 24.9 percent	18	3.6%
25.0 to 29.9 percent	17	3.2%
30.0 to 34.9 percent	9	1.8%
35.0 to 39.9 percent	17	3.2%
40.0 to 49.9 percent	16	3.0%
50.0 percent or more	10	2.0%
Not computed	13	2.5%
Monthly Housing Costs*		
Total:	2,247	100.0%
Less than \$100	< 5	0.0%
\$100 to \$199	13	0.6%
\$200 to \$299	0	0.0%
\$300 to \$399	< 5	0.0%
\$400 to \$499	33	1.5%
\$500 to \$599	26	1.2%
\$600 to \$699	10	0.5%
\$700 to \$799	33	1.5%
\$800 to \$899	77	3.4%
\$900 to \$999	141	6.3%
\$1,000 to \$1,499	355	15.8%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
\$1,500 to \$1,999	281	12.5%
\$2,000 to \$2,499	275	12.2%
\$2,500 to \$2,999	217	9.7%
\$3,000 or more	762	33.9%
No cash rent	25	1.1%
Computers In Household		
Total:	2,028	100.0%
Has one or more types of computing devices:	2,002	98.7%
Desktop or laptop	1,921	96.0%
Smartphone, tablet or other portable wireless computer or other computer	1,921	96.0%
No Computer	26	1.3%
Internet Subscriptions In Household		
Total:	2,028	100.0%
With an Internet subscription	1,967	97.0%
Dial-up alone	0	0.0%
Broadband such as cable, fiber optic, or DSL	1,752	89.1%
Satellite Internet service	31	1.6%
Other service	< 5	0.2%
Internet access without a subscription	18	0.9%
No Internet access	42	2.1%
Household Language By Household Limited English Speaking Status		
Total:	2,028	100.0%
English only	1,223	60.3%
Spanish:	154	7.6%
Limited English speaking household	8	5.0%
Not a limited English speaking household	147	95.0%
Other Indo-European languages:	95	4.7%
Limited English speaking household	13	13.9%
Not a limited English speaking household	82	86.1%
Asian and Pacific Island languages:	551	27.2%
Limited English speaking household	164	29.7%
Not a limited English speaking household	387	70.3%
Other languages:	< 5	0.2%
Limited English speaking household	< 5	100.0%

* The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.

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	Buffer Estimates	Percent
Not a limited English speaking household	0	0.0%

** The variables marked with an asterisk are estimated from Census Tract level data because the variables are not available at the Block Group level.*

Appendix 2 - Environmental Justice Plan

Environmental Justice

Document any significant population of protected persons are present within the limits of your project. A list of such populations can be found in Section B. If no such populations exist, no environmental justice analysis is necessary; document demographic data showing no such population exists. If such populations exist, identify possibly adverse environmental externalities to those populations. A comprehensive list of externalities can be found in Section A. If no such externalities exist, no environmental justice analysis is necessary. Document the lack of any such externalities. If significant externalities exist, commit to and document outreach to inform affected people about the effects of the project on their community, as well as to gather feedback on the effects of your project on local populations, especially those protected under Title VI. This process can and should be conducted in tandem with other community outreach efforts, and be consistent with the guidelines for conducting effective community outreach. This process should also allow documentation of more accurate and relevant externalities. Develop and document mitigations for the issues are identified to be highly adverse. Ensure that adverse environmental externalities not fully addressed by mitigations do not disproportionately affect populations of protected persons. A useful tool to determining this analysis can be found in Section B.

Section A: Core Affected Populations

Sub-Groups	
Race/Ethnicity	<ul style="list-style-type: none">• Color• National Origin• Citizenship• Tribal Affiliation• Language/Limited English
Age	<ul style="list-style-type: none">• Elderly• Small Children• Health
Disability	<ul style="list-style-type: none">• Wheelchair Access• Hearing• Sight• Cognitive Disabilities• Respiratory• Sleep disorders
Income	<ul style="list-style-type: none">• Family income• Zero vehicle households

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Section B: Externalities

<i>Externality</i>	<i>Key Questions</i>	<i>Examples</i>
<i>Transportation</i>	How does your project affect people's ability to get to where they need to go?	<ul style="list-style-type: none"> • Driving times • Road conditions • Parking • Public Transit Accessibility • Pedestrian Access • Bicycle Access • Safety
<i>Acquisitions, Displacements, Relocations</i>	Who will have to move for your project to move forward? How far will they have to move? What is the burden on these people?	<ul style="list-style-type: none"> • Businesses • Residences • Location Accessibility • # of residents/employees displaced
<i>Land Use/Economic Activities</i>	What land are you using? Whose is it? What was it originally used for? What is the effect?	<ul style="list-style-type: none"> • Zoning areas • Level of development • Nearby property values • Access to local businesses
<i>Aesthetics</i>	What effect will your project have on the beauty of the area?	<ul style="list-style-type: none"> • Trees • Shrubbery • Structure shape and design • Natural Light • Noise levels
<i>Air Quality</i>	How would the quality of air be affected by your project?	<ul style="list-style-type: none"> • Smoke • Dust • Federal Air Quality Standards • Emissions from vehicles
<i>Noise and Vibration</i>	What noises and vibrations would your project create? How frequently and long would this noise be? How loud is it? What times of day would these noises occur? Who can hear it? Are there vibration-sensitive facilities affected?	<ul style="list-style-type: none"> • Passing vehicles • Passing population • Residential areas during night • Business areas during day • Seismology Research • Research Laboratories
<i>Ecosystems</i>	What are the local ecosystems? How will they be affected?	<ul style="list-style-type: none"> • Fish passages • Small wildlife • High value habitats • Threatened or Endangered species • Wetlands • Agricultural Lands

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<i>Water Resources</i>	How are local water resources affected by your project?	<ul style="list-style-type: none"> • Storm Drains • Streams • Groundwater • Stormwater • Runoff and pollution
<i>Hazardous Materials</i>	Does your project require the use of disposal of hazardous waste? Where and how is it being disposed of?	<ul style="list-style-type: none"> • Asbestos • Garbage • Pesticides
<i>Utilities</i>	How does your project affect the ability of utilities to service local residents and businesses?	<ul style="list-style-type: none"> • Electricity • Water • Natural Gas • Waste Collection • Telecommunications
<i>Public/Private services</i>	How does your project affect access to public and private services?	<ul style="list-style-type: none"> • Police • Fire • Schools • Daycares • Community Centers • Grocery Stores • Places of Worship
<i>Historic, Cultural, and Archaeological</i>	How does your project affect local structures and locations with historic, cultural or archaeological significance?	<ul style="list-style-type: none"> • Monuments • Historic buildings • Statues • Parks • Tribal Lands
<i>Construction</i>	What effects will the construction associated with your project have?	<ul style="list-style-type: none"> • Noise/Vibration • Air Quality • Road closures/Transportation Accessibility

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Appendix 3 - Title VI Program for FTA Compliance

2024 City of Bellevue Title VI Program for FTA Compliance

Introduction

The City of Bellevue (City) is a Federal Transit Administration sub-grantee to King County. King County Metro contracts with the City to fund commuter incentives, employer programs, and other transportation demand management efforts. The city does not directly provide any transit service.

To meet Title VI program requirements, the city has its own procedures to meet certain requirements such as a complaint process and public participation. In addition to its own compliance measures, the City will rely upon the analysis and overall program efforts conducted by King County Metro to meet requirements, e.g. Limited English Proficiency.

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

General Reporting Requirements

A. Title VI Notice to the Public

The City of Bellevue Title VI Notice to the Public is as follows:

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

The City of Bellevue hereby gives public notice that it is the City's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin (including limited English proficiency) be excluded from the participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Federal Aid Highway program or other activity for which the City of Bellevue receives federal financial assistance.

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 Bellevue. Any such complaint must be in writing and filed with

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the City of Bellevue's Human Resources Director within 180 days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained through the City's website (www.bellevuewa.gov) or from the City of Bellevue Human Resources Director at no cost to the complainant.

To file a Title VI discrimination complaint, contact:

City of Bellevue

Attn: Human Resources Director

PO Box 90012, Bellevue, WA 98009-9012

450 110th Avenue NE, Bellevue, WA 98004

ADATitleVI@bellevuewa.gov

B. Title VI Complaint Procedures and Form

A Title VI complaint form and instructions for filling out a Title VI complaint can be obtained on the City of Bellevue's website (www.bellevuewa.gov). The City of Bellevue's Title VI Complaint Procedures are available in Appendix 1, and a copy of the City's Title VI complaint form is available in Appendix 2.

C. Title VI Investigations, Complaints, and Lawsuits

The City of Bellevue has had no Title VI complaints related to transit during the past three years.

D. Public Participation Plan

The City of Bellevue fully encourages public involvement and participation in decision-making processes. As part of the King County Department of Transportation work plan for public transit projects, the City adopts the public participation plan of King County Metro Title VI Program Report and will coordinate with King County Metro in public participation efforts related to transit projects being managed by the City of Bellevue.

E. Language Assistance Plan

In addition to its own Limited English Proficiency (LEP) research and compliance efforts, as a sub-recipient, the City relies upon the limited English proficiency analysis conducted by King County. A comprehensive LEP plan has been

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developed and will be available as an appendix to the full Title VI plan, as well as online.

LEP compliance research conducted by the City of Bellevue indicates that the most prevalent non-English languages in Bellevue are Spanish and Mandarin Chinese. Additionally, the languages of Spanish, Mandarin Chinese, Russian, Korean, Cantonese, Japanese and Vietnamese all meet the federal 'safe harbor' threshold for translating vital documents.

City of Bellevue efforts to ensure language access include LanguageLine interpretation assistance available free of charge, translation of certain "Vital Documents" including the Title VI complaint form into up to twelve languages and placing "interpretation available" multi-lingual graphics on documents for public release. For more information on the City of Bellevue's language access compliance efforts, consult the full LEP plan online.

F. Monitoring Sub-recipients

The city has no sub-recipients. It will cooperate with King County Metro in providing information and attending meetings as required by King County Metro in its monitoring procedures of our efforts.

G. 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.

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

The most recent revision of the City of Bellevue's full Title VI Plan was adopted in January 2020, with an official Policy of Nondiscrimination signed and approved by the City Manager, Transportation Department Director, and the Assistant City Attorney. The documentation of approval for FTA compliance can be found in Appendix 7 and will be included as an appendix in the next update of the City of Bellevue's full Title VI plan, anticipated in March 2024 and will be found in Appendix 3.

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Appendix 1: Complaint Procedures - Allegations of Discrimination in Federally Assisted Programs or Activities

A. Overview

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 and related statutes, relating to any program, facility, or activity managed by the City of Bellevue. The procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination or unaccommodated barriers to access. Every effort will be made to resolve complaints informally at the city level. The option of informal mediation meeting(s) between the affected parties and a designated mediator may be utilized for resolution. Intimidation or retaliation of any kind is prohibited by law.

B. Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written complaint with the ADA/Title VI Civil Rights Administrator. A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaint forms are available through the City's website or by contacting a Title VI Coordinator. The City will not officially act or respond to complaints made verbally.
2. Upon receiving the written complaint, the ADA/Title VI Civil Rights Administrator in consultation with the Transportation Department Title VI Coordinator and other City offices, will determine its jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint.
3. If the complaint is against the City, the City will request the Washington State Department of Transportation (WSDOT) Office of Equal Opportunity conduct the investigation. In the event WSDOT handles the investigation, they will follow their adopted procedures for investigating discrimination complaints, per their current State Title VI Plan. If the complaint is against a sub-recipient, consultant, or contractor, under contract with the City, the appropriate Department and/or division shall be notified of the complaint, within 15 calendar days, and the City will determine whether it will investigate the complaint or request WSDOT to conduct the investigation.

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4. Once the City decides its course of action, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will be logged into the records of the Title VI Coordinator, and the basis for the allegation identified including race, color, national origin (including limited English proficiency (LEP)), disability, age or sex.
5. In cases where the City of Bellevue assumes investigation of the complaint, the City will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days upon receipt, to furnish the City with his/her response to the allegations.
6. Within 60 days of receipt of the complaint, the Title VI Coordinator or WSDOT investigator will prepare a written investigative report for the Department Director and City Manager. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The recommendation shall be reviewed by the City Attorney's office, which may discuss the report and recommendations with the Transportation Department and City Title VI Coordinators and/or other appropriate departmental staff. The report will be modified as needed and finalized for its release to the parties.
8. Once the investigative report becomes final, briefings will be scheduled with each party within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.
9. A copy of the complaint and City or WSDOT investigative report will be issued to WSDOT's External Civil Rights Branch (or the appropriate oversight agency) within 60 calendar days of the receipt of the complaint.
10. If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s) he or she shall be advised of their rights to appeal the decision to WSDOT, U.S. Department of Transportation or U.S. Department of Justice. The complainant has 180 calendar days after the appropriate agency's final resolution to appeal to USDOT. Unless new facts not previously considered come to light, reconsideration of the final determination by the investigating agency will not be available.
11. The Title VI Coordinator will maintain an annual Log of Complaints, which will

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contain the following information for each complaint filed:

- The name and address of the person filing the complaint
- The date of the complaint
- The basis of the complaint
- The disposition of the complaint
- The status of the complaint

Only qualified and well-trained investigators should conduct these investigations. No agency may investigate a complaint against itself.

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Appendix 2: Title VI Complaint Form

(This form has been translated into over 12 different languages per LEP guidelines)

City of Bellevue Title VI Complaint Form



If you believe that you have been discriminated against because of your race, color, or national origin (including limited English proficiency), by city programs or activities, you may file a formal complaint by completing this form and sending it by postal mail to:

City of Bellevue
Attn: Human Resource Director
P.O. Box 90012
Bellevue, WA 98009-9012

City of Bellevue Use Only		
Received		
Response		
Report		
Briefing		

Your Name: _____

Phone Number: _____

Best time of day to contact you about this complaint:

☐ 7-10 a.m. ☐ 10 a.m.-1 p.m. ☐ 1-4 p.m. ☐ 4-7 p.m.

Email Address: _____

Mailing Address: _____
Street

City _____ State _____ Zip _____

What was the alleged discrimination based on? Select all applicable:

☐ Race ☐ Color ☐ National Origin (Including limited English proficiency)

Date of alleged incident: _____

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Agency or person(s) responsible for the alleged discrimination:

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

Name: _____

City State Zip

Phone Number: _____

[illegible]

[illegible]

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List any other persons that we should contact for additional information in support of your complaint. Please include their phone numbers, addresses, email addresses, etc.

Name: _____

Phone Number: _____

Email Address: _____

Mailing Address: _____
Street

City State Zip

Name: _____

Phone Number: _____

Email Address: _____

Mailing Address: _____
Street

City State Zip

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List any other agencies with whom you have filed this same complaint:

Name: _____ State: _____


Name: _____ State: _____

Name: _____ State: _____

Name: _____ State: _____

Name: _____ State: _____

Signature (Required) Date

 For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-6168 (voice) or email ADATitleVI@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov. BHR-23-8119

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Appendix 3: City Approval of Title VI Program for FTA Compliance

The City of Bellevue assures that no person shall on the grounds of race, color, national origin, or sex 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 sponsored program or activity. The City of Bellevue further assures every effort will be made to ensure nondiscrimination in all its programs and activities, regardless of whether those programs and activities are federally funded.

As a recipient of financial assistance from the Federal Transit Administration (FTA) through its financial agreements with King County, the City of Bellevue is subject to Title VI and its accompanying implementation regulations. King County has requested that the City of Bellevue, as a sub-grantee, comply with this requirement and document their compliance by adopting a Title VI program. The Title VI program previously adopted by the City must therefore be updated to meet the reporting requirements of the FTA.

Assurance of compliance falls under the proper authority of the City Manager's Office pursuant to its budgetary authority and responsibility. The City Manager, Department Director, 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, and the relevant FTA circular.

DocuSigned by:

7CB8C27858F040D...

City Manager

4/11/2024 | 4:33 PM PDT

Date


DocuSigned by:

B3850A86437C418...

Transportation Department Director

4/5/2024 | 2:52 PM PDT

Date

DocuSigned by:

2F6CF0CFE9D24BB...

Assistant City Attorney

4/5/2024 | 2:15 PM PDT

Date

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Appendix 4 - Transportation Department Complaint Procedures

Transportation Department Complaint Procedures

A. Overview

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by the City of Bellevue Transportation Department, as well as to sub-recipients, consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law.

The procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints informally at the City and sub-recipient level. The option of informal mediation meeting(s) between the affected parties and a designated mediator may be utilized for resolution.

B. Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written complaint with the ADA/Title VI Civil Rights Administrator. A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaint forms are available through the City's website or by contacting a Title VI Coordinator. The City will not officially act or respond to complaints made verbally.
2. Upon receiving the written complaint, the ADA, Title VI, and Equal Opportunities Officer in consultation with the Transportation Department Title VI Coordinator and other City offices, will determine its jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint.
3. If the complaint is against the City, the City will request the Washington State Department of Transportation (WSDOT) Office of Equal Opportunity conduct the investigation. In the event WSDOT handles the investigation, they will follow their adopted procedures for investigating discrimination complaints, per their current State Title VI Plan. If the complaint involves a project or program that has received Federal financial assistance from the Federal Highway Administration (FHWA) then WSDOT will forward the complaint to FHWA for all decisions regarding whether the complaint under FHWA jurisdiction should be accepted, dismissed, or referred to another agency. If the complaint is against a sub-recipient, consultant, or contractor, under contract with the City, the appropriate Department and/or division shall be notified of the complaint, within 15 calendar days, and the City will determine

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whether it will investigate the complaint or request WSDOT to conduct the investigation.

4. Once the City decides its course of action, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will be logged into the records of the Title VI Coordinator, and the basis for the allegation identified including race, color, national origin (including limited English proficiency), disability, age or sex.
5. In cases where the City of Bellevue assumes investigation of the complaint, the City will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days upon receipt, to furnish the City with his/her response to the allegations.
6. Within 60 days of receipt of the complaint, the Title VI Coordinator or WSDOT investigator will prepare a written investigative report for the Department Director and City Manager. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The recommendation shall be reviewed by the City Attorney's office, which may discuss the report and recommendations with the Transportation Department and City Title VI Coordinators and/or other appropriate departmental staff. The report will be modified as needed and finalized for its release to the parties.
8. Once the investigative report becomes final, briefings will be scheduled with each party within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.
9. A copy of the complaint and City or WSDOT investigative report will be issued to WSDOT's External Civil Rights Branch (or the appropriate oversight agency) within 60 calendar days of the receipt of the complaint.
10. If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s) he or she shall be advised of their rights to appeal the decision to WSDOT, U.S. Department of Transportation or U.S. Department of Justice. The complainant has 180 calendar days after the appropriate agency's final resolution to appeal to USDOT. Unless new facts not previously considered come to light, reconsideration of the final determination by the investigating agency will not be available.
11. The Title VI Coordinator will maintain an annual Log of Complaints, which will contain the following information for each complaint filed:
 - The name and address of the person filing the complaint
 - The date of the complaint

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- The basis of the complaint
- The disposition of the complaint
- The status of the complaint

Only qualified and well-trained investigators should conduct these investigations. No agency is allowed to investigate a complaint against itself.

C. Informal Complaint Resolution

1. The City of Bellevue will make every effort to resolve complaints promptly and at the lowest level possible.
2. Informal mediation may be used to resolve complaints at any state of the process.
3. If a complaint cannot be resolved informally, the City of Bellevue may conduct an investigation of the complaint or forward it on to WSDOT for investigation.

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Appendix 5 - Title VI Core Team Charter



Title VI Core Team

Background

The City of Bellevue, as a grant-funded entity, is required by federal law to comply with Title VI of the Civil Rights Act of 1964. This act ensures that the city will not discriminate against federally protected groups. This is a city-wide requirement which involves many aspects of city business, from public-facing communications to program and outreach participation. In the four years since the hiring of the city-wide ADA/Title VI Administrator approximately 300 staff from across the city have been trained in the important practices of compliance. Training efforts are ongoing, however, there continue to be gaps in consistency of service delivery and reporting requirements in the following areas:

- Translation of vital documents
- Consistent use of translation and interpretation related to reasonable accommodation
- Collection and analysis of federally required documentation and data in projects serving protected groups
- Alignment with the 60 recommendations of the Diversity Advantage Plan

To address these gaps, in 2022 the city formed an interdepartmental Title VI Core Team made up of at least one representative from each of the city's 13 departments. Many departments have also chosen to have more than one member to address needs by functional area. Still more departments have elected to form short-term project teams to address specific Title VI concerns, such as assessing what vital information is produced department-wide.

Training of the City-wide Title VI Core Team

To ensure that these core team members develop the subject matter expertise necessary to serve as supports to those in their department, they have been provided with 13.5 hours of training, facilitated by the city's ADA/Title VI Civil Rights Program Administrator and the Transportation Department's Title VI Coordinator. These training sessions provided more context in many of the areas already covered in the training available for all staff titled "Title VI of the Civil Rights Act Employee Training". The topic areas covered in the Title VI Core Team Training were:

- Introductions and Overview of Team Dynamics
- Title VI of the Civil Rights Act 101
- Four-factor Analysis
- Language Access: The Why
- Language Access: The How
- Title VI and Environmental Justice
- Title VI: The Spirit of the Law Versus the Letter of the Law
- Title VI and Demographics

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Title VI Core Team: Measuring Success/Desired Outcomes

- City-wide consistency in the translation and interpretation of vital information across various environments, digital and print materials
- Increased engagement of marginalized populations in city-sponsored outreach efforts
- Decrease in incidents of misinformation among non-English speaking residents during emergencies
- Increase department efficiencies and assure compliance by centralizing responsibility for alternate format and reasonable accommodation requests related to language access
- City collected data will more accurately reflect the diverse population of Bellevue, allowing better targeted efforts
- Reducing the financial and legal risks associated with non-compliance

Title VI Core Team Functional Areas

Core Team	Department Management Team	Title VI Core Team Oversight
Community Development	Departmental Leadership	ADA/Title VI Administrator, HR
City Manager's Office (Comms)	Departmental Leadership	ADA/Title VI Administrator, HR
Fire (OEM)	Departmental Leadership	ADA/Title VI Administrator, HR
Parks and Community Services	Departmental Leadership	ADA/Title VI Administrator, HR
Development Services	Departmental Leadership	ADA/Title VI Administrator, HR
Police	Departmental Leadership	ADA/Title VI Administrator, HR
Transportation (required for reporting. Departmental Title VI Coordinator has been established.)	Departmental Leadership	ADA/Title VI Administrator, HR
Information Technology	Departmental Leadership	ADA/Title VI Administrator, HR
Finance and Asset Management	Departmental Leadership	ADA/Title VI Administrator, HR
Utilities	Departmental Leadership	ADA/Title VI Administrator, HR
City Clerk's Office	Departmental Leadership	ADA/Title VI Administrator, HR
City Attorney's Office	Departmental Leadership	ADA/Title VI Administrator, HR
Human Resources	Departmental Leadership	ADA/Title VI Administrator, HR

Core Team Member responsibilities:

- Serve as a conduit between the department and the ADA/Title VI Administrator on issues related to Title VI compliance
- Serve as an SME for department members on Title VI compliance

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- Check in and coordinate with department leadership on departmental progress related to Title VI efforts
- Gain the necessary training or education needed to serve in the role by working with the ADA/Title VI Administrator to identify opportunities
- Work with the ADA/Title VI Administrator to address and mitigate Title VI compliance grievances and complaints
- Serve as the department-wide point of contact for public requests for Title VI-related accommodation assistance

Management Team Responsibilities:

- Check in and coordinate with Core Team member as needed to discuss department-specific efforts related to Title VI compliance
- Help to advance the work of Title VI compliance to the leadership of the department
- Advance departmental cultural competence by advocating for training and education for all department members on issues related to Title VI to a level that is appropriate for the position

ADA/ Title VI Civil Rights Program Administrator Responsibilities:

- Provide Title VI SME to Core Team members on specific issues and projects that further compliance effort
- Track progress of departmental workplan items related to Title VI
- Provide reports to city leadership and Council related to Title VI compliance as needed
- Identify discipline-specific training opportunities for Core Team as needed
- Address grievances and complaints related to Title VI in a manner that is consistent with federal requirements and city policy
- Ensure alignment with the 60 recommendations of the Diversity Advantage Plan

Title VI Core Team Member Time Commitment

Modeled after the existing ADA Core Team, which has 13 SMEs across seven departments, the Title VI Core Team members are estimated to spend an average eight hours per month on duties related to the team. This will fluctuate based on the project needs of the department and grievances brought forth by the public. As the team is formed it is anticipated that this commitment may increase up to 12 hours per month due to necessary training and development. It is anticipated that the time commitment for participation will decrease over time as the city develops better processes, policies, and practices to ensure Title VI compliance. It is anticipated that member time will be divided monthly into:

- Address departmental projects that interface with Title VI, bringing forth staff questions and concerns, and addressing community complaints or grievances with the ADA/Title VI Administrator and/or department supervisor (1-3 hours)
- Responding to staff questions, reviewing documents and projects for compliance, and providing SME to staff (2 - 3 hours)
- Training and research related to Title VI professional development (1 - 2 hours)

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Timeline for Implementation

The proposed timeline for implementation is as follows:

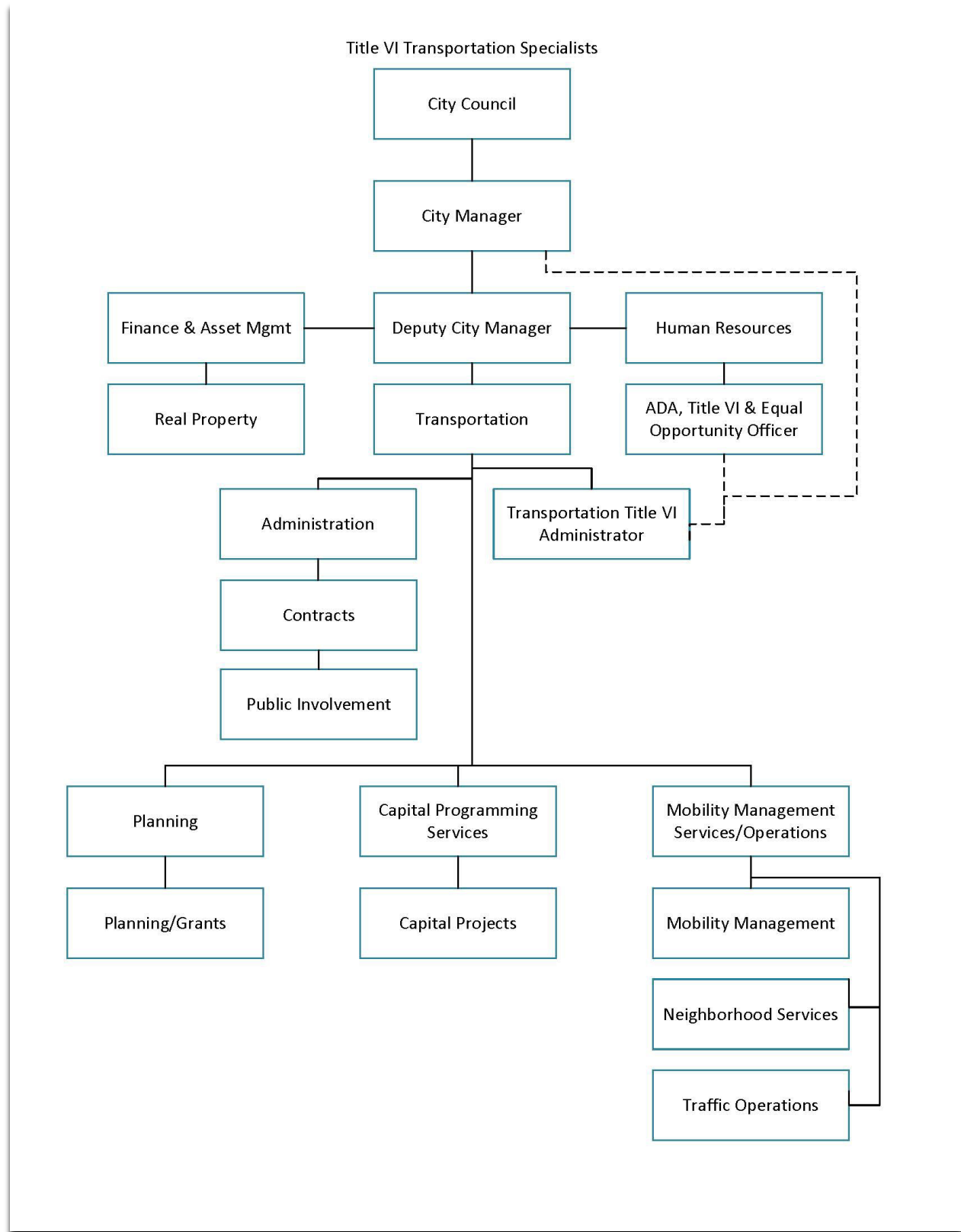
- Early Q3 2021: Meet with the Title VI Core Team to define roles, responsibilities, and commitments
- Mid-Q3 2021: Work with Title VI Core Team members to identify both universal and subject matter specific training needs
- Q4 2021: Training of Title VI Core Team
- Q1 2022: Departmental roll out of the Title VI Core Team
- Q2-3 2022: Development of Title VI workplans for 2023
- Q4 2022: Finalization of Title VI workplans for 2023

Annual Work Plan Development and Completion

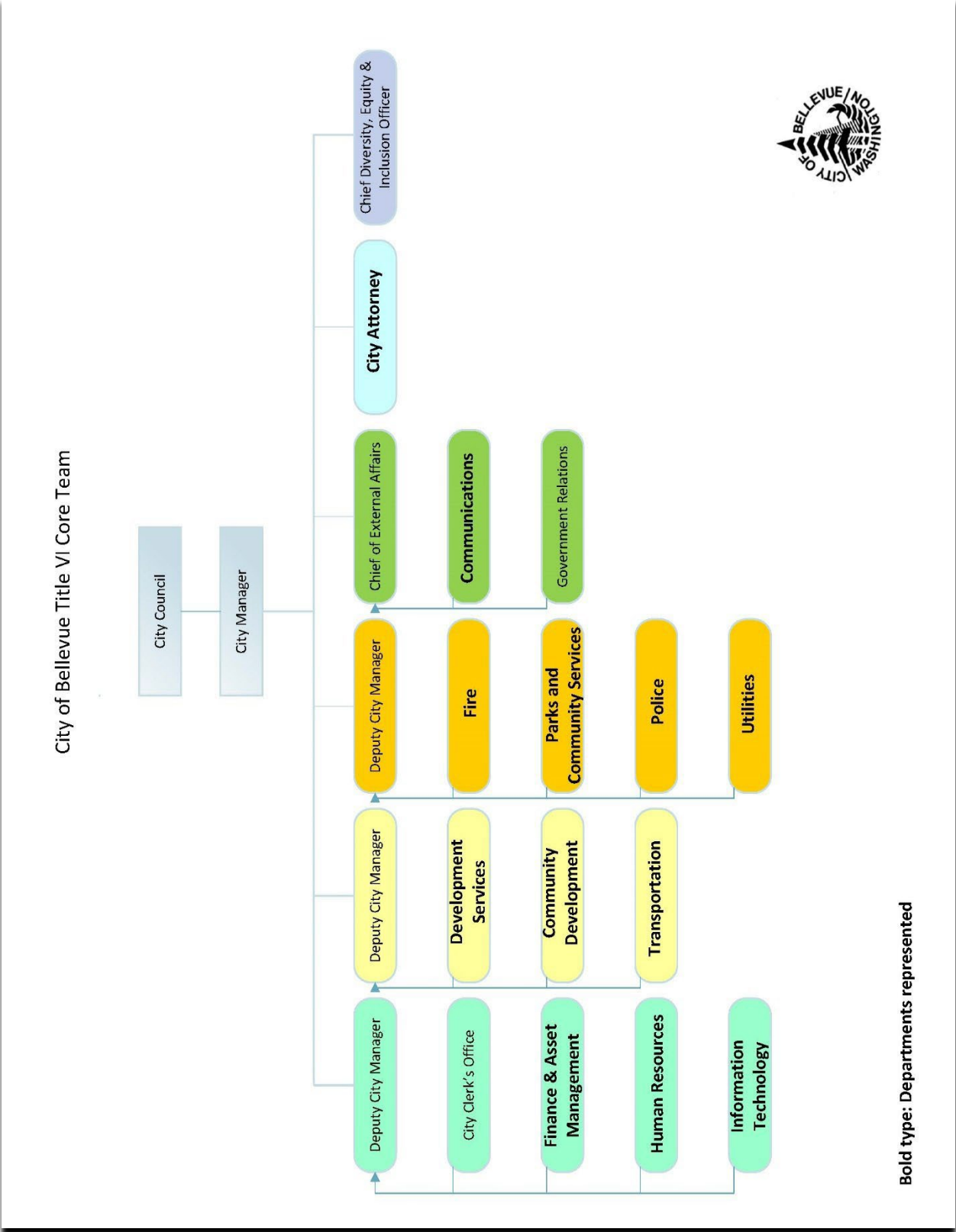
Led and supported by the Title VI Core Team member assigned to that department, the City of Bellevue ADA/Title VI Civil Rights Program Administrator and leadership, each department will create an annual workplan to define projects that will be completed to further the efforts of removing barriers to full participation in city programs and functions. These workplans will be monitored and adjusted on a continuous basis to ensure timely and proactive removal of barriers faced by those who are protected under Title VI of the Civil Rights Act.

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Appendix 6 - Organizational Charts



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Appendix 7 - Language Access Policy

City of Bellevue

Language Access Policy

This Language Access Policy provides the City of Bellevue’s framework for communicating with individuals with limited English proficiency (LEP). It is intended as a guide for all City of Bellevue staff who interact with or develop programming or other materials for the public in any capacity and may need to communicate vital information to LEP individuals. Additional resources are available on the City’s [Language Access SharePoint page](#).

Purpose and Scope

The City of Bellevue is committed to providing exceptional public service. This requires that we “recognize the ethnic, economic, and cultural diversity of the community and provide alternative service models to meet the differing needs of our residents.” This commitment also involves, in part, taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access and an equal opportunity to participate in City services, activities, programs, and other benefits.

Key Definitions

- 2.1. Limited English Proficiency (LEP): This term refers to individuals who do not speak English as their primary language, speak English less than “very well,” and who have a limited ability to read, speak, write, or understand English.
- 2.2. Translation: Translation is the conversion of written communication from one language to another in written form. An accurate translation is one that conveys the intent and essential meaning of the original text.
- 2.3. Interpretation: Interpretation is the oral rendition of a spoken message from one language to another, preserving the intent and meaning of the original message.
- 2.4. Vital Documents: Vital documents refers to documents or information that is essential for obtaining services or benefits and/or would cause harm to the individual if not provided accurately or in a timely manner. Examples of vital information include:
 - Application forms;
 - Information about how to access services or benefits;
 - Consent and complaint forms;
 - Notices of availability of free language assistance;
 - Explanations of a department’s direct services;
 - Information on how you can protect yourself from COVID-19 or other risks.
- 2.5. Primary Languages: Primary languages are languages other than English spoken by at least 5 percent of Bellevue’s residents or 1,000 people, whichever is less. Based on the available data, the following languages meet or exceed this threshold:

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- Chinese (Traditional/Mandarin)
- Spanish
- Korean
- Russian
- Japanese
- Chinese (Simplified/Cantonese)
- Vietnamese

- 2.6. **Certified Translator:** A certified translator is someone who has completed a recognized translation certification program and/or passed a recognized and credible translation examination. Resources to help determine if a translator is appropriately certified for a specific project, as well as questions to ask before hiring a translator or language services vendor are available on the Language Access SharePoint site.
- 2.7. **Certified Interpreter:** A certified interpreter is someone who has completed a recognized interpretation certification program and/or passed a recognized and credible interpretation examination. Resources to help determine if an interpreter is appropriately certified for a specific project, as well as questions to ask before hiring an interpreter or language services vendor are available on the Language Access SharePoint site.
- 2.8. **LanguageLine:** The LanguageLine is a real-time interpretation service accessed through the phone. This service is available to all City of Bellevue employees. Instructions for accessing LanguageLine services can be found on the Language Access SharePoint site.

Policies

The City of Bellevue should make reasonable efforts to implement the following policies:

3.1. Translation

- 3.1.1. All public-facing documents should include the City's Title VI graphic where the word "Information," "Questions," or "Interpreter" appears in multiple languages along with a phone number for residents to call to get information or to access an interpreter. All public-facing documents should also include the City's reasonable modification statement. Staff should ensure that this statement is translated wherever the accompanying information is translated.
- 3.1.2. City Departments should review their programs and materials to identify vital documents and develop a plan to translate these documents. This should be an ongoing process as new programs and materials are created.
- 3.1.3. City Departments should translate vital documents into the primary languages.
- 3.1.4. City Departments that are conducting major projects in a neighborhood or area where 5 percent of the population consist of a specific language group should translate vital documents into that language(s). Departments should use the City's Mapshot tool to determine the proportion of LEP individuals in a particular area. Detailed instructions for how to use this tool are available on the City's Language Access SharePoint page.

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3.1.5. City Departments that are providing a targeted service to a particular language group should translate information about the service into that language.

3.1.6. City Departments should translate documents if requested, regardless of whether the document is a vital document or whether the translation requested is into one of the primary languages, when necessary to provide meaningful access to programs and services.

3.2. Interpretation

3.2.1. City Departments should use the LanguageLine and other available resources, as appropriate, for interpretation to assist and inform residents about City services and programs.

3.2.2. Invitations and notices for community meetings or events should include a statement informing the public in the primary languages that interpretation services may be provided, if possible, at the meeting or event if requested at least 48 hours prior to the event. This statement should be translated into the appropriate language matching the material it accompanies.

3.2.3. City Departments conducting neighborhood specific events or meetings in an area where 5 percent of the residents represent a specific language group should provide interpretation services in the language(s) spoken if requested at least 48 hours prior to the event.

3.2.4. City Departments that are providing targeted service to a particular language group should provide interpretation services for that language at meetings and events with those residents.

3.3. Competency and Quality Assurance

3.3.1. City Departments should use certified translators and certified interpreters who are able to provide culturally and linguistically appropriate services.

3.3.2. Employees should not be asked to translate or interpret unless they are certified to do so and it is part of their job duties except in life safety situations.

3.3.3. Automated and machine translation technology such as “Google Translate” should not be used.

3.3.4. City Departments should not ask family members or friends of an LEP individual to translate or interpret except in life safety situations.

3.3.5. City Departments should report any concerns or issues with language access service providers as soon as possible to the ADA/Title VI Administrator at adatitlevi@bellevuewa.gov or (425) 452-6168.

3.3.6. City Departments are responsible for costs related to language access and should include these anticipated expenses in their budgeting process.

3.3.7. The City will make reasonable efforts to provide high quality translation and interpretation services but cannot guarantee that the services provided are adequate for the purposes of every individual in every circumstance and disclaims any liability alleged to arise from such services.

3.4. Training

3.4.1. The City should make language access resources and training available and easily accessible to all employees as well as contractors expected to interact with the public, including providing a LanguageLine access/instructional card.

Employees should be instructed on how and when to use LanguageLine services during their initial new hire orientation/training. Contractors who interact with the

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public on behalf of the City are expected to comply with all aspects of Title VI and will be provided with training as needed.

3.4.2. City staff who may interact with LEP individuals and who are not employed in a short term or seasonal capacity should be required to complete a training on Title VI of the Civil Rights Act that covers the basics of Title VI, language access, environmental justice, and the connection between Title VI and the City's Diversity Advantage Initiative. The City will periodically review and evaluate who should be required to complete this Title VI training as well as the content and frequency of the training.

3.5. Emergency Communications

3.5.1. In emergency situations where it is critical that broad-based communications reach known LEP communities, the City should follow its Emergency Communications Plan for Limited English Populations available on the City's Language Access SharePoint page.

3.5.2. For localized emergencies, the City's Emergency Operations Center (EOC) and Public Information Officer network may also utilize pre-translated alerts and notifications for basic instructions during common emergencies. This enables staff to quickly and effectively choose the most accurate situational messaging to communicate during common emergency scenarios (e.g., floods, earthquakes, fires, landslides).

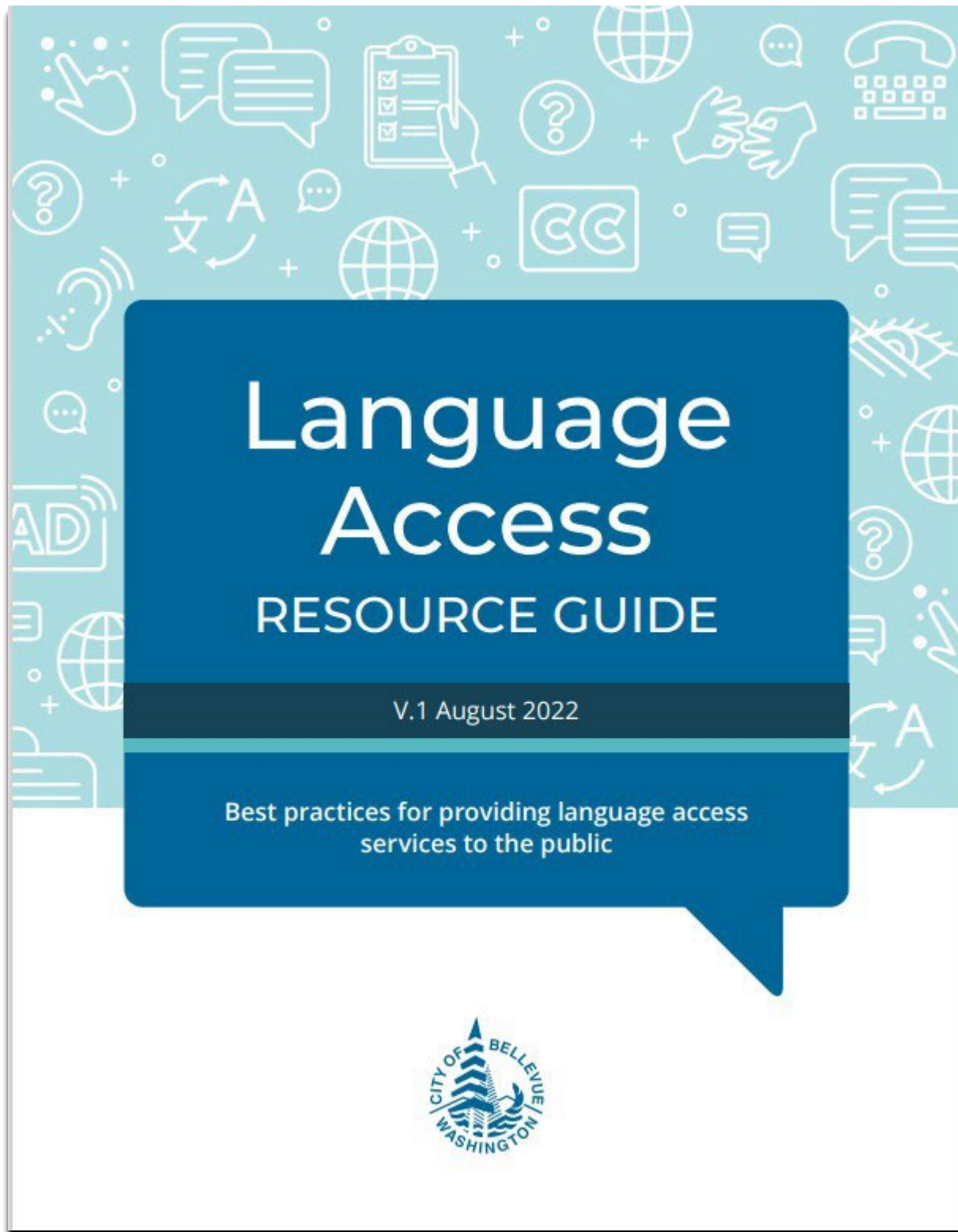
3.6. Evaluation and Metrics

3.6.1. City Departments hosting in-person events are responsible for recording certain event information and submitting it to their Title VI Core Team member. Departments are also responsible for asking event attendees to complete voluntary demographic forms and for submitting these forms to their Title VI Core Team member after the event. More information about responsibilities concerning Title VI metrics is available on the City's Language Access SharePoint page.

3.6.2. The City should regularly solicit feedback and comments from staff, LEP individuals and communities, and language access service providers on the effectiveness of these policies and other City processes regarding language access.

3.6.3. The City should periodically review these policies and make adjustments, as appropriate, based on changing demographics and other factors.

Appendix 8 - Language Access Resource Guide



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Introduction

What is language access?

Language access is a person's ability to access government services regardless of which language they speak. This includes people who are Deaf, Blind, hard-of-hearing, or deafblind who may require sign language interpreting, tactile interpreting, braille, or other services to access government resources.

Language access is a person's ability to access government services regardless of which language they speak.

What does LEP stand for?

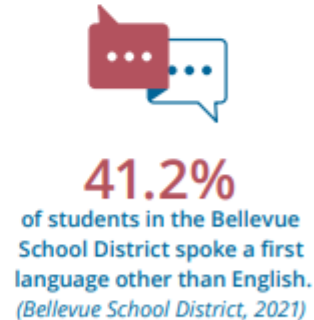
People who have identified themselves as reading, writing, speaking, or understanding English less than well are described as having **Limited English Proficiency**, or LEP.

Why is language access important?

It is required by law: Title VI of the Civil Rights Act of 1964, as well as various Washington state laws, protect LEP individuals from discrimination. This includes providing language access.

It is essential to equitable community outreach: Providing language access helps the city build better relationships and engage in more equitable outreach with diverse communities. Interacting with people in the languages they best understand shows that the city cares and wants to work with them.

Bellevue is linguistically diverse:



(American Community Survey, 2019)

Lack of access can have serious consequences: Community members who speak English less than well need access to the same vital government information, supports, and services as those who speak English. Not providing language access for vital information or services could cause harm to LEP individuals.

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Introduction

Language access is critical to reach everyone in the community: Language access and Title VI are built into the city's Diversity Advantage Initiative, which was passed by the city council in 2015.

Diversity Advantage Initiative recommendations:

"Establish City-wide standards for translation of written material, interpretation services at meetings, and for physical access to meetings and programs."
(*Cultural Competence in City Government, recommendation nine*)

"Produce welcome packets for new residents with language translations available, promoting community organizations, City services and local businesses."
(*Cultural Competence in the Community, recommendation seven*)

"Translate materials on human service resources and referral programs available in Bellevue into the most commonly spoken languages where need exists."
(*Human Services, recommendation two*)

"Interpretation, translation and accommodation services at public meetings should be consistent and reliable over time to shape community expectations."
(*Civic Engagement, recommendation three*)

Using the language access resource guide

This guide is part of the City of Bellevue's approach to language access, along with the language access policy and LEP emergency communications plan, both of which can be found on the city's [Language Access SharePoint site](#). This guide is intended as a how-to document that walks city employees through the process of providing language access services to the public.

The first section of the guide focuses on **planned** interactions including meetings, public events, and other projects that require public interaction or outreach but are planned in advance.

The second section of the guide focuses on **unplanned** situations such as field interactions, receiving phone calls in a language other than English, or receiving an individual request for modification.

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Part 1: Planned situations

Employees at the city can be proactive in providing language access. Examples where the city may be required to provide language access without a specific request for modification from a resident include:

- a planned project that will require public outreach
- a public event where interpreters will be needed
- a project that is federally funded
- the translation of vital forms

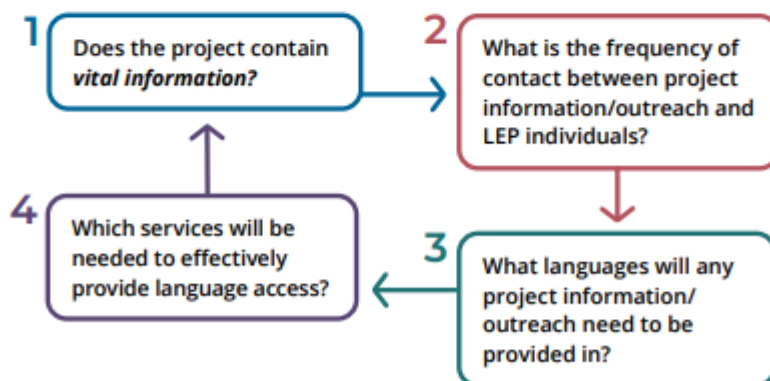


The city uses a four-factor analysis to determine whether language access services are needed (detailed below). Before each public-facing project, it is recommended that project groups go through a four-factor analysis to ensure that their project and outreach is in line with Title VI, the section of the Civil Rights Act of 1964 that protects those who are LEP from discrimination.

What is four-factor analysis?

Four-factor analysis is a process that helps employees better consider what information they may need to provide in languages other than English, and which languages they may need to provide that information in.

Four-factor analysis will ask employees to consider four main questions:



A detailed walkthrough of four-factor analysis as well as a tutorial video can be found on the city's [Language Access SharePoint site](#).

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Part 1: Planned situations

Determining what information to translate and/or interpret

One of the first steps employees will take when performing a four-factor analysis is determining what information must be provided in languages other than English.

Employees should consider two questions to determine what information must be conveyed to the public in languages other than English:

1. Does the project, event, or outreach contain any vital information?

- Vital information refers to any information that “is critical for obtaining services and/or benefits or is required by law.”
- A project, outreach, or event that contains vital information will likely need to be translated and/or interpreted into all languages meeting the safe harbor threshold described below.

2. Do LEP individuals frequently interact with the project, event, or outreach regardless of whether that information is vital?

- If LEP individuals frequently interact with the project, event, or outreach, regardless of whether that information is vital, that information often should be translated or interpreted into the languages meeting the safe harbor threshold.

Vital information refers to any information that “is critical for obtaining services and/or benefits or is required by law.”

When thinking about whether or not something should be translated, employees should consider the potential consequences of the information not being accessible to LEP individuals.

As of the 2020 census, the following languages meet or exceed the safe harbor threshold citywide:

- **Chinese**
(*Traditional/Mandarin*)
- **Spanish**
- **Korean**
- **Russian**
- **Japanese**
- **Chinese**
(*Simplified/Cantonese*)
- **Vietnamese**
- **English**

Determining languages needed

Employees need to know which LEP communities in the project area meet the safe harbor threshold to determine what languages to provide information in.

The **safe harbor threshold** is a federal guide that establishes when vital information must be translated. Vital information should be translated for each LEP language group that constitutes five percent of the population of the project area, or 1,000 people, whichever is less.

Languages that meet or exceed the safe harbor threshold may vary depending on the affected project area.

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Part 1: Planned situations

Mapshot

Mapshot is an internal mapping tool used by employees. A Title VI demographics layer has been developed to determine demographic project information in a project area, including number and proportion of LEP individuals. Employees can select US Census block groups in Bellevue that are within the project area and view a demographics report for that area, including data on LEP populations and languages to determine which populations meet the safe harbor threshold.

Detailed instructions for accessing demographic information using Mapshot can be found on the city's [Language Access SharePoint site](#).

Determining services needed

Once an employee has determined the languages needed and information to be translated or interpreted, they should choose a translation or interpretation provider using the following questions:

- Is the information written, typed, or on a document?
 - ✓ If yes, see the [translation](#) section below.
- Is the information shared by a speaker (remote or in-person)?
 - ✓ If yes, see the [interpretation](#) section below.

Planning and budgeting for language access

It is the responsibility of the department to ensure that language access needs are budgeted for in project budgets. ***Lack of funds is not an acceptable reason to deny language access when required.***

This often requires:

- Ensuring early on that the project or program budget considers the cost of doing outreach in other languages.
- Setting aside time to perform four-factor analysis, work with translation companies, work with department PIOs, and work with Graphics.

Providing language access is not optional—it is part of Title VI compliance and helps make the city a more inclusive and welcoming place.

Translation

Translation applies to all written forms of communication. This includes applications, flyers, park signs, social media posts and more.

Once an employee has used four-factor analysis to identify documents for translation, they will need to reference Graphics' translations workflow, available in the City of Bellevue style guide and on the [Language Access SharePoint site](#). All translated documents should go through Graphics to ensure accessibility, branding, and other guidelines are followed.

All documents that go through Graphics are stored in a document repository. This ensures

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Part 1: Planned situations

that those documents can be referenced or updated later even if the original file owner is no longer at the city. Each document is assigned a specific ID number to make it easy to find. Ensuring that all public-facing documents go through Graphics is a best practice that helps to ensure language access consistency.

When these documents are placed in the repository, any resident who receives information in English and needs a translation can call the city, provide the unique reference number, and receive real time support.

Sometimes translation vendors will offer desktop publishing or design services as extra items in a translation quote. In most cases, employees should not request these services, as design work is done in-house by the Graphics team. If you have questions as to whether the graphics can be done in house, reach out to the Graphics team at graphics@bellevuewa.gov.

Translation applies to all written forms of communication. This includes applications, flyers, park signs, social media posts and more.

Reasonable modification statement

The following statement should accompany all public-facing informational and marketing materials. This includes flyers, posters, banners, invitations, etc. It applies to all departments. The statement cannot be shortened. Do not use a condensed font.



For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-XXXX (voice) or email XXXX@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov.

Minimum size for type is 8-9pt if using Open Sans. For other font faces use 9-10pt or larger. Always use standard fonts like Open Sans, Helvetica or Calibri. For accessibility, please avoid condensed font, light, thin, italic or bold versions.

Please provide all necessary information mentioned above when submitting your Graphics request.

If you have any questions regarding the ADA statement above or need help, please reach out to the ADA, Title VI, and Equal Opportunity Officer at adatitlevi@bellevuewa.gov or (425) 452-6168.

All public meetings must be accessible as per ADA and Title VI requirements, the city have to fulfill reasonable modification requests. The statement above notifies residents that the city can provide these services upon request.

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Part 1: Planned situations

Translating emergency information

During natural disasters, pandemics, and other situations where the City of Bellevue is communicating life safety information to the public, the city is required, as per RCW 38.52.070, to translate all vital information into languages meeting the safe harbor threshold for the city and/or affected area.

More information on emergency communications can be found on the [Language Access SharePoint site](#).

Short translation jobs

Vendors often have minimum charges for translation. If a project is just a few words or sentences, it may be more cost-effective to group these with translation of other project materials.

It may also be cost-effective to group multiple small translation jobs from different projects into a single request if allowed by the vendor.

Keep in mind that even if vital information is just a few words or sentences, it still must be translated.

Keep in mind that even if vital information is just a few words or sentences, it still must be translated.

Translating webpages

If a webpage contains vital information or an employee has questions about webpage translation, they should reach out to their department web publisher, usually a public information officer (PIO) or administrator. Another option is to submit a [web ticket](#).

Braille translation

More information about translating materials into braille can be found on the city's [Language Access SharePoint site](#). It is helpful to order braille translation as far in advance as possible.

How to write for translation

To make documents easier to translate and easier for a general audience to understand, employees may want to:

- Avoid using idioms (e.g., raining cats and dogs) that may not translate well into other languages or cultures.
- Try to keep sentences simple and short.
- When possible, avoid using large or highly technical words.

City of Bellevue Title VI Plan – March 2024

Part 1: Planned situations

Interpretation

Interpretation services apply to all spoken or signed forms of communication, including speaking at public events, speaking over the phone, or using American Sign Language at a public program.

There are several services that fall under the umbrella of interpretation. To determine which one(s) are needed, consider the following questions:

Is the event in-person or remote?

- If the event is in-person, the city may need to provide in-person interpretation or interpretation headsets, depending on the scale and interpretation needs of the event.
- If the event is remote, an employee may need to provide remote video interpretation.

What is the scale of the event?

- If the event is a large event including 50+ people, the employee will likely need to provide in-person interpretation or remote video interpretation.
- If the event is smaller in scale or requires interpretation into multiple languages simultaneously, another option could be to provide interpretation headsets.
- If an employee is unsure which interpretation service to use, they should consider contacting their department's Title VI Core Team member. Contact information is available on the [Language Access SharePoint site](#).

How to work with an interpreter

Once an employee has hired an interpreter, they should:

1. When possible, provide the interpreter with a list of complex or city-specific terms and speakers' names before the event.
2. During the event, look at and speak directly to the LEP individual, not the interpreter. Remember, this is a conversation between the employee and the LEP individual—the interpreter is only there to facilitate communication.
3. During the event, the interpreter should interpret exactly what is said. They should not have a conversation with the employee or the LEP individual without interpretation.

For concerns about the quality of interpretation at an event, contact the ADA, Title VI, and Equal Opportunity Officer at adatitlevi@bellevuewa.gov or (425) 452-6168.

Tutorial videos and more information on working with an interpreter are available on the [Language Access SharePoint site](#).

Interpretation services apply to all spoken/signed forms of communication, including speaking at public events, speaking over the phone, or using American Sign Language at a public program.

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Part 1: Planned situations

Sign language interpretation

Sign language interpretation is one method of providing language access for those who are Deaf or hard-of-hearing and use sign language to communicate.

Important guidance on working with a sign language interpreter and supporting Deaf, hard-of-hearing, or deafblind individuals can be found on the [Language Access SharePoint site](#).

Interpretation headsets

Another tool available at the city is interpretation headsets. Much like a radio, these headsets can be set to specific frequencies. An interpreter for a specific language will be wearing a headset set to one frequency, and all individuals who wish to hear interpretation for that language will wear headsets set to the same frequency. Those wearing the headsets do not need to stand right next to the interpreter to hear the interpretation. Because multiple interpretations can be happening simultaneously, this option may be ideal for events with multiple interpretation needs such as group tours.

Employees will still need to hire an interpreter for each language. More information, including the headset check-out procedure, is available on the [Language Access SharePoint site](#).

Communication Access Realtime Translation (CART)

CART involves the transcription of words as they are spoken into captions that can be broadcast or projected onto a screen at an in-person event. This screen may be a cellphone, a television, or a projector screen.

CART is useful in providing language access for people who are Deaf or hard-of-hearing. It is also helpful for LEP individuals and audiences who wish to receive information both visually and auditorily.

More information about CART can be found on the [Language Access SharePoint site](#).

Voiceovers and video transcription

Some individuals, especially those who are blind, may require voiceovers of video content. Visit the [Language Access SharePoint site](#) for more information.

Requesting services

Once an employee has determined the information to be translated or interpreted, languages, and services needed, they will need to find a vendor. Employees may want to consider referencing the vendor list provided on the [Language Access SharePoint site](#).

Navigating the vendor list on the Language Access SharePoint site

The vendor list provided on the [Language Access SharePoint site](#) is for reference purposes. Vendors were selected based on the array of services they can provide, not through a

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Part 1: Planned situations

competitive procurement process. Staff may use other vendors. All vendors must be appropriately certified.

Vendor payment options

Once a vendor is chosen, staff should work with Procurement to determine how to procure and pay for language access services. Two possible methods of payment include:

- **ProCard:** Request the services needed from the chosen vendor. Present information to the vendor to charge the card. Obtain a receipt or invoice from the vendor as confirmation the services were provided, and this will be used as support for the ProCard charge.
- **Purchase order (PO):** Departments select the vendor, then enter an under \$5,000 purchase order in JD Edwards. Send the PO to the vendor. Once the service is complete, obtain an invoice and process the invoice for payment.

For further questions about procuring and paying for language services, contact Procurement at 425-452-7876 or procurement@bellevuewa.gov.

Procurement resources

For ProCards: [ProCards \(sharepoint.com\)](#)

For invoice payments: [Invoices & Payments \(sharepoint.com\)](#)

Purchase Orders: Job Aids for purchase order process are found on the procurement services SharePoint site under Quick Links, titled Job Aids & References - [Procurement \(sharepoint.com\)](#)

Appropriate certification

Resources are available on the [Language Access SharePoint site](#) to help staff determine if an interpreter or translator is appropriately certified for a specific project.

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Part 2: Unplanned Situations

Especially for those who interact with the public daily or work in the field, unplanned interactions with Limited English Proficient (LEP) individuals come up. These situations may include:

- Front desk interactions
- Phone calls, voicemails, or field interactions
- Responses to emergency calls



When encounters like this occur, stay calm and communicate with courtesy and kindness. It is likely that this is not the first time the LEP individual has interacted with someone who does not speak their language. Oftentimes communication can be achieved even across language barriers with patience, creativity, and a willingness to listen.

Tip: Remember that speaking slowly at an increasing volume does not improve communication if someone does not know the language you are speaking.

Some tools available to facilitate communication in unplanned situations include:

Interpretation Services Available	
Arabic ١٢٣ ٤٥٦ ٧٨٩	Spanish ١٢٣ ٤٥٦ ٧٨٩
Burmese ၁၂၃ ၄၅၆ ၇၈၉	Tagalog ၁၂၃ ၄၅၆ ၇၈၉
Chinese 一 二 三 四 五 六 七 八 九 十	Thai ๑ ๒ ๓ ๔ ๕ ๖ ๗ ๘ ๙ ๑๐
English 1 2 3 4 5 6 7 8 9 10	Vietnamese 1 2 3 4 5 6 7 8 9 10
Haitian 1 2 3 4 5 6 7 8 9 10	Yoruba 1 2 3 4 5 6 7 8 9 10
Hindi 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Japanese 1 2 3 4 5 6 7 8 9 10	Portuguese 1 2 3 4 5 6 7 8 9 10
Korean 1 2 3 4 5 6 7 8 9 10	Russian 1 2 3 4 5 6 7 8 9 10
Laotian 1 2 3 4 5 6 7 8 9 10	Swedish 1 2 3 4 5 6 7 8 9 10
Malay 1 2 3 4 5 6 7 8 9 10	Tamil 1 2 3 4 5 6 7 8 9 10
Nepali 1 2 3 4 5 6 7 8 9 10	Urdu 1 2 3 4 5 6 7 8 9 10
Pashto 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Polish 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Portuguese 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Russian 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Spanish 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Tagalog 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Thai 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Urdu 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Vietnamese 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10
Yoruba 1 2 3 4 5 6 7 8 9 10	Other 1 2 3 4 5 6 7 8 9 10

“I speak” cards

Each card has a phrase on it in a different language asking a speaker of that language to mark or point to the card. The card also has the name of the language in English. Employees can then look at the card, read the language name in English, and identify which language the person wishes to communicate in. From there, employees can call the LanguageLine (described below) and request an interpreter in the appropriate language.

“I speak” cards can be found on the [Language Access SharePoint site](#).

LanguageLine

LanguageLine Solutions is a **real-time** telephonic interpretation service available to all employees. To use this service, employees should follow these steps:

1. Dial: **(833) 708-2184**
2. State the name of the language you need, using the voice recognition. Press one or say yes to confirm. Press two or say no to try again.

LanguageLine
Solutions®

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Part 2: Unplanned situations

3. When asked provide: Your First and Last Name
4. When asked provide: Name of your Department
5. You will then be connected to an interpreter who will greet you and offer their first name and interpreter ID number. Write down this information.
6. Brief the interpreter and give any special instructions.
7. **If you are ever asked, provide your 6 digit Client ID: 543842.**

LanguageLine cards are available for all employees. These cards have the contact information for LanguageLine, and many employees carry them with their badge. To request a LanguageLine card, contact a Title VI Core Team member. The contact information for LanguageLine and Title VI Core Team members can be found on the [Language Access SharePoint site](#), along with tutorial videos, advice, and more information on using LanguageLine.

Individual requests for modification

Another type of unplanned interaction that city employees may encounter is individual requests for modification.

As stated in the [ADA and Title VI notice of rights](#), individuals may request reasonable modification of a city program, document, or service. This includes situations like:

- Requests for interpretation at a public meeting
- Requests for translation of a city document

These requests can be fulfilled in multiple ways:

- **For interpretation requests**, hire an in-person interpreter or use remote video interpretation, depending on the request. A list of some interpreters, as well as guidance on finding and selecting an interpreter, can be found on the city's [Language Access SharePoint site](#) or in the [Interpretation](#) section above.
- **For translation requests**, request translation services and inform the individual that receiving a complete translation may take a few days. Establish a way to follow-up with the individual to ensure they receive the translated documents. Important guidance on document translation can be found in the [Translation](#) section above. A list of translation vendors can be found on the [Language Access SharePoint site](#).

If an employee feels a request for modification is not reasonable, **they should not make this determination on their own**. Discuss this request with the city's ADA, Title VI, and Equal Opportunity Officer as soon as possible using the contact information on the [Language Access SharePoint site](#).

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Part 2: Unplanned situations

Responding to emergency calls

When responding to an emergency call, there may be LEP individuals who require language access support. It can be tempting to simply ask children, family members, or friends to interpret for LEP individuals. However, this should not be done except in situations of life safety.

Federal language access guidelines recommend against using children, family members, or friends as interpreters. This is for multiple reasons:

- Children, family members, and friends are typically not professional, certified interpreters and may have biases that influence their interpretation.
- Asking children, family members, or friends to interpret when not a matter of life safety is an undue burden.

Unless it is a matter of life safety, staff should call the LanguageLine at (833) 708-2184 instead of asking friends or family to interpret.

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Part 3: Quality assurance & metrics

Quality assurance

What are the city's quality assurance requirements?

1. Staff should only use certified translators and interpreters who are able to provide culturally and linguistically appropriate services.
2. Automated and machine translation technology such as "Google Translate" should not be used.
3. Employees should not be asked to translate or interpret unless it is part of their job duties and they are certified to do so.
4. Family members and friends of an LEP individual should not be asked to interpret.

Why do these requirements exist?

These quality assurance requirements exist to ensure the city provides language access that is compliant with laws, culturally appropriate, and grammatically and graphically correct.

Why not Google Translate?

Automated and machine technology such as "Google Translate" should not be used.

This is because the city must use translations from professional, certified translation vendors to ensure compliance with Title VI and proof of due diligence.

These software tools can also often make errors in the translation of anything more complicated than individual words.

Why not friends and family?

Friends and family should not be asked to interpret *except in cases of life safety*. This is for multiple reasons:

- Children, family members, and friends are typically *not* **professional, certified** interpreters and may have biases that influence their interpretation.
- Asking children, family members, or friends to interpret when not a matter of life safety is an **undue burden**.

Quality Concerns?

For **questions or concerns** about the quality of language services provided by a vendor, **contact** the ADA, Title VI, and Equal Opportunity Officer. Contact information is on the [Language Access SharePoint site](#).

- **Interpretation:** For quality concerns about interpretation, be sure to record the interpreter name, interpretation service, and other relevant information.
- **Translation:** For concerns about translation accuracy, staff can request a review of the translation from the company who provided the original translation.

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Metrics

Title VI requires the City of Bellevue to gather statistical data on participants and beneficiaries of city programs. Accurate collection of this data is linked to receipt of funding. Collecting this data also allows the city to see who is and is not at the table when it comes to public input on projects impacting different communities.

Staff hosting in-person events have two responsibilities regarding data collection for Title VI:

- **Voluntary demographics forms:** Ask event attendees to complete voluntary demographic forms. Employees should bring these forms (including translated copies in the relevant languages) to their event and encourage attendees to fill them out. After the event, employees should submit these forms to their department's Title VI Core Team member.
- **Event information:** Event organizers should record the following information, to be submitted to their department's Title VI Core Team member after the event:
 - Event name
 - Event purpose
 - Number of attendees
 - Date
 - At least one flyer or another piece of public outreach related to the event



Voluntary demographics forms, important guidance on collecting voluntary demographic data, and more information about metrics can be found on the [Language Access SharePoint site](#).

For any questions regarding any of the information found in this document, employees should contact their department's Title VI Core Team member or the city's ADA, Title VI, and Equal Opportunity Officer. Up-to-date contact information can be found on the [Language Access SharePoint site](#).

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