



Cancer Can't

TITLE VI of the Civil Rights Act of 1964 Implementation Plan For the Years 2022-2024

Reviewed and Approved by: Rebecca Van Keulen

Rebecca Van Keulen, Founder and President

Date: 1/25/2022

TITLE VI PLAN 2022-2024

Program Overview

Under grants from the Washington State Department of Transportation and with support from local communities, Cancer Can't provides intercity transportation in a six-county area, (Spokane, Lincoln, Stevens, Pend Oreille, Kootenai, Bonner) linking individuals with disabilities, specifically cancer, with needed services in the Greater Spokane area.

Policy Statement

Cancer Can't is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible transportation services. Cancer Can't recognizes its responsibilities to the communities in which it operates and to the society it serves. It is Cancer Can't's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs of transportation service delivery.

Objective

Toward this end, it is Cancer Can't's objective to:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Promote the full and fair participation of all affected populations in transportation decision making;
- C. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- D. Ensure meaningful access to programs and activities by persons with limited English proficiency.

Responsibility

The responsibility for carrying out Cancer Can't's Title VI program has been delegated to the Cancer Can't Director of Outreach by the President of Cancer Can't. The Director of Outreach is responsible for the day-to-day operations of this program and will receive and investigate Title VI complaints; however, all employees share in the responsibility for making all of Cancer Can't's Equity, Diversity and Inclusion initiatives including, Cancer Can't's Title VI program, a success. Cancer Can't will notify the public of their rights under Title VI through its website.

Title VI Notice to the Public

To comply with 49 CFR 21.9(d), Cancer Can't and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. Cancer Can't has established a policy statement to inform individuals of their Title VI rights and posts this statement on its website.

Non-Discrimination Notice

Cancer Can't provides equal access to its programs without regard to gender, religion, disability, sexual orientation, age or any other protected class. In accordance with Title VI of the Civil Rights Act of 1964, Cancer Can't does not discriminate on the basis of race, color, or national origin.

For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact the Director of Outreach at (509) 731-3076 or email info@cancercant.com.

If information is needed in another language, contact SNAP at (509) 456-7627

Si necesita información en otro idioma, comuníquese al (509) 456-7627

Для получения информации на другом языке звоните по тел. (509) 456-7627

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 456-7627

Title VI Complaints

Title VI Complaint Procedures Cancer Can't will communicate to anyone wishing to file a Title VI complaint that if he or she believes that he or she has been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under Cancer Can't's programs of transportation service delivery, he or she may file a complaint with Cancer Can't, PO Box 336 Four Lakes, WA 99014. A Civil Rights Complaint Form has been developed for this purpose (attached).

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. Cancer Can't will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigation will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, Cancer Can't will complete a final report for the Cancer Can't Board of Directors. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report. The investigation process and final report should take no longer than thirty (30) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the Board of Cancer Can't, PO Box 336, Four Lakes, WA 99014.

The complainant also has the right to file a complaint or lawsuit with the following organizations:

Organization Name and Address				
Spokane Transit Authority	Washington State DOT Public Transportation Division	Federal Transit Administration	U.S. Dept of Justice Civil Rights Division	SNAP - Spokane Neighborhood Action Partners
Attn: STA Ombudsman	Attn: Title VI Coordinator	Attn: Title VI Program Coordinator	Attn: Coordination and Review Section NWB	Attn: SNAP Neighbors on the Go
1230 West Boone Spokane WA, WA 99201	P O Box 47387 Olympia, WA 98504-47387	East Building, 5 th Floor-TCR 1200 New Jersey Ave, SE Washington, DC 20590	950 Pennsylvania Avenue NW Washington, DC 20530	3102 W Whistalks Way Spokane, WA 99224

Record Keeping

The Cancer Can't Director of Outreach will maintain a log of Title VI complaints, including lawsuits, received from this process which name Cancer Can't or any of the above-named organizations and shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by Cancer Can't in response to the complaint. The log shall include investigations by outside agencies. The log and related records shall be kept according to federal and state record retention requirements, but at least six years from the closure of the grant project or the useful life of equipment, whichever is applicable.

Title VI Complaints Received

Cancer Can't has not been the subject of any civil rights investigations, complaints or lawsuits to date.

Protection from Retribution

Customers should be able to make complaints without fear of retribution. If a customer feels that s/he is being treated unfairly in response to a Complaint, s/he may contact the Board of Directors of Cancer Can't.

Cancer Cant's Title VI Complaint Form

Cancer Can't does not discriminate in the provision of service on the basis of race, color, and national origin.

Should you require any assistance in completing this form, please let us know.

Complete and return this form to:
Cancer Can't
PO Box 336
Four Lakes, WA 99014

(Please Type or Print Clearly)

1. Complainant's name

2. Address

3. City, State, Zip code

4. Home phone number (____)_____ (Cell or mobile number) (____)_____

5. Email address

6. Are you the Complainant? ___ Yes ___ No
If no, Your name

Relationship to the Complainant

Phone (____)_____ Cell (____)_____

Email _____

Does the Complainant know you are filing this complaint? ___ Yes ___ No

7. Which of the following best describes the reason you believe the alleged discrimination took place?

Select all that apply. Was it because of your:

a. Race

b. Color

c. National Origin

8. Date of alleged discrimination (month/day/year)

9. In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible. Please use the back of this form if additional space is required.

10. Please give the name, mailing address, home phone number, and cell phone number for anyone who witnessed the alleged discrimination.

11. What would you consider an appropriate resolution to your complaint?

12. Have you filed this complaint with any other agency? ___ Yes ___ No

Agency Name

Agency Contact Person/Phone

13. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date (month/day/year)

Within 15 working days of receiving the completed complaint, Cancer Can't will acknowledge receipt of the complaint in writing. The letter will include information about the investigative steps to be taken and a timeline for resolution. If additional information is needed from the complainant, Cancer Can't will request that information be provided in writing to append to the original complaint. A final letter of resolution will be sent to the complainant on completion of the investigation.

Upon request, alternative formats of this document will be produced for people who need accommodations. Call 509-731-3076.

Customer Complaint and Comment Process

Stakeholders have several methods for communicating comments or complaints:

- By phone at 509-731-3076
- By phone at 509-761-9787
- Via Cancer Cant's website www.cancercant.com
- Via email at info@cancercant.com

All complaints are logged and distributed to the relevant manager who researches each complaint and responds back to the complainant. Comments and suggestions are also forwarded to the relevant manager for possible action.

Low Income and Minority Demographics

The table below shows US Census Bureau data from the 2015-19 American Community Survey 5-Year Estimate of poverty status. The data shows that all areas served by Cancer Cant's programs have poverty rates greater than the state average.

Poverty Status in Last 12 Months for Persons over 5 Years Old

	Total Population	Population Below Poverty Level	Percent Below Poverty Level
Washington State	7,614,893	746,259	9.8%
Spokane County	522,798	67,440	12.9%
City of Spokane	222,081	38,420	17.3%
City of Spokane Valley	101,060	11,319	12.3%
Idaho State	1,787,065	200,151	11.2%
Kootenai County	165,697	16,570	10%
Post Falls	36,250	5,328	14.7%
Coeur D'Alene	52,414	7,757	14.8%

Data from the US Census Bureau 2015-19 American Community Survey 5-Year Estimates, appearing in the following table, shows the minority population in the areas served by Cancer Can't.

Total Population by Race

	Spokane County		City of Spokane		City of Spokane Valley		Kootenai County		Post Falls		Coeur d'Alene	
Total Population	522,798		222,081		101,060		165,697		36,250		52,414	
White	464,767	88.9%	188,103	84.7%	90,752	89.8%	156,584	94.5%	33,821	93.3%	48,955	93.4%
Black or African America	10,455	2.0%	5,108	2.3%	1,213	1.2%	663	.4%	109	.3%	157	.3%
American Indian & Alaska Native	9,410	1.8%	3,997	1.8%	1,112	1.1%	2,154	1.3%	181	.5%	943	1.8%
Asian	12,547	2.4%	5,996	2.7%	1,516	1.5%	1,491	.9%	363	1.0%	629	1.2%
Native Hawaiian & Pacific Islander	3,137	.6%	1,998	.9%	505	.5%	166	.1%	36	.1%	0	0%
Other	524	.1%	3,775	1.7%	1,920	1.9%	331	.2%	181	.5%	314	.6%
Two or More Races	21,958	4.2%	13,104	5.9%	4,042	4.0%	4,308	2.6%	1,559	4.3%	1,415	2.7%

Inclusive Public Participation

Title VI requires community outreach that seeks out and considers the viewpoints of minority and low-income populations regarding the services Cancer Can't offers. The activities described below detail Cancer Can't's outreach activities and will continue to form the basis of outreach efforts in the coming years.

Surveys Cancer Can't conducts periodic client satisfaction surveys to identify success and barriers to our services. These surveys are conducted by phone and email to patients and Cancer Institutes.

Outreach Cancer Can't's staff provides information regarding Cancer Can't's services including our transportation services at all cancer institutes in the Spokane and surrounding areas. Additionally, our Director of Outreach has semiannual meetings with all social workers and patient navigators in the Greater Spokane area to ensure they are aware of the program resources. These social workers are the stakeholders for the patients with disabilities and are their lifeline to services in our community.

Minority and LEP Populations Outreach Activities

The Cancer Can't Transportation program is in partnership with SNAP. As part of the partnership, Cancer Can't utilizes the LEP services SNAP provides to ensure LEP populations are being served. Cancer Can't has included a link for LEP services SNAP provides on their website at www.cancercant.com. The following are outreach activities to minority and LEP populations accomplished by our partner SNAP:

SNAP Activity
Added a translation application to www.snapwa.org that will transcribe services listed on SNAP's website including transportation services in over 55 languages.
Added an accessibility application to www.snapwa.org for those who may be visually impaired.
Worked closely with Homeless Outreach team to ensure those individuals without homes have access to transportation to seek medical services.
Participated in transportation summits (2) with 38 stakeholders, including agencies representing low income, minority, and LEP, to collect & prioritize data about barriers to access, complex needs/ gaps in services, solutions to cultural disparities, and geographic service deficiencies
Conducted a Community Needs Assessment that engaged community partners and clients in a series of surveys to determine which community needs (including transportation) were most important to them.
Participated in the Spokane Collaborative Equity Workgroup which brings together a wide array of service partners focused on improving service delivery for Medicaid (low-income) recipients.
Conducted outreach to Spokane City and County Library systems.
Conducted Outreach to various Senior Centers such as: Mid-City Concerns, Corbin Senior Activity Center, Hillyard Senior Activity Center
Conducted Outreach to various Community Centers including Northeast Community Center, West Central Community Center and East Central Community Center
Conducted outreach with community partners such as Cancer Can't, Long Term Care Ombudsman, Aging and Long-Term Care and the Community Health Worker Network

The following are SNAP's planned outreach activities to minority and LEP populations:

- Develop targeted relationships with teachers and programs at Spokane Falls Community College, Spokane Community College, and Eastern Washington University, North Idaho College
- Conduct outreach to community groups and organizations such as The NATIVE Project, Latinos in Spokane, Asian Pacific Islander Coalition of Spokane, the Carl Maxey Center, and the Spokane NAACP and similar organizations in Kootenai County, Idaho.
- Staff information booth at LEP and minority population outreach events

The following are outreach activities to minority and LEP populations accomplished by Cancer Can't. In 5 years of providing transportation services Cancer Can't has only encountered 1 individual needing LEP services, but Cancer Can't still provides these activities listed below in addition to SNAP's services.

Cancer Can't Activity
Added a link on www.cancercant.com website to the www.snapwa.org website for the translation application to www.snapwa.org that will transcribe services listed on SNAP's website including transportation services in over 55 languages.
Plans to add Cancer Can't's LEP services to our transportation brochure that is located in cancer clinics in Spokane when the brochures need to be printed again.
Work with cancer clinics to inform them on SNAP's LEP programs offered to patients who participate in Cancer Can't's transportation program.
Posted LEP services in the Cancer Can't semi-annual newsletter sent out to our donor base.
Added a link on www.cancercant.com website to the www.snapwa.org website for the accessibility application to www.snapwa.org for those who may be visually impaired.

Limited English Proficiency Plan

Policy Statement. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who have limited English proficiency (LEP). A person with LEP is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English.

LEP Assessment. Cancer Can't conducted an LEP assessment for the service area by using US Census Bureau estimates based on the 2019 American Community Survey of the US census, Incidence data provided by the National Program of Cancer Registries [\[PDF\]](#) Cancer Surveillance System (NPCR-CSS), Centers for Disease Control and Prevention and by the National Cancer Institute's Surveillance, Epidemiology, and End Results (SEER) Program. Additionally, Cancer Can't did a consultation with community organizations, including SNAP and Cancer Care Northwest staff. SNAP had conducted the "four-factor analysis" per the U.S. Department of Transportation LEP guidance. Cancer Can't added additional information for the additional areas served. The results are as follows:

1. Determine the number of LEP persons eligible to be served or likely to be encountered by a program, activity or service.

SNAP interviewed operations staff and found that the transportation program is rarely used by LEP residents. Census information confirms that the areas served by SNAP routes have a small number of residents who lack proficiency in English. Cancer Can't interviewed social workers at the primary oncology clinic (Cancer Care Northwest) and also found that the transportation program is rarely used by LEP patients. Although there is not an exact Census for cancer patients who also lack proficiency in English, we know that residence with a cancer diagnosis is only a small portion of the population identified by the Census. This further confirms a very small number of patients who lack proficiency in English.

**2015-19 US Census Estimate
Language Spoken at Home by Persons over 5 Years Old**

	Total Population	Spanish-Speak English Less than Very Well		Other Indo-European-Speak English Less than Very Well		Asian/Pacific Islander-Speak English Less than Very Well		Other Languages-Speak English Less than Very Well	
Spokane County	474,707	3,019	.6%	4,444	.9%	3,472	.7%	831	.2%
City of Spokane	204,111	1,154	.6%	2,395	1.2%	1,958	1.0%	4480	.2%
City of Spokane Valley	90,929	935	1.0%	788	.9%	530	.6%	240	.3%
Kootenai County	147,913	878	.6%	304	.2%	179	.1%	51	0%
Post Falls	30,291	125	.4%	81	.3%	85	.3%	45	.1%
Coeur d'Alene	47,141	407	.9%	80	.2%	49	.1%	0	0%

**2014-18 Washington State Cancer Incidence Report
All Races, Ages and Sexes Included**

	Average Annual Count	Incidence Rate per 100,000	
Spokane County	2,228	378.9	.37%
Stevens County	237	357.8	.35%
Pend Oreille County	78	350.1	.35%
Lincoln County	60	342.8	.34%

2. Determine the frequency with which LEP persons come into contact with our program.

Cancer Can't consulted Social Workers at Cancer Care Northwest about LEP contacts and found them to be very rare. There have been no LEP concerns raised from clients of the Cancer Can't transportation programs when conducting outreach.

3. Determine the importance of the program, activity or service to people's lives.

Transportation to and from medical appointments for seniors and individuals with disabilities is of great importance. During SNAP's 2019 Community Needs Assessment transportation was identified as an issue key to our client population. The number of individuals with limited English proficiency is minimal in our service area but we continue to make resources available to serve this population in meeting these critical transportation needs.

4. Determine the resources available and cost. Cancer Can't in partnership with SNAP has the following resources for LEP persons:

- Cancer Can't contracts with SNAP to have LEP patients utilize their services.
- Interpretation services are free of charge upon request by calling (509) 456-7627. SNAP contracts with Spokane International Translation and ASAP Translation to provide interpretation services. Cost: \$13.75-\$17 per 15 minutes.
- SNAP has contracted with ASAP Translation for document translation. Documents can be translated into English, Russian, Vietnamese and Marshallese. Cost: \$.10-\$.30 per word.
- SNAP has several bi-lingual staff in Spanish, Russian and American Sign Language available to help as needed. No cost
- SNAP has added a translation widget to its website. No Cost
- SNAP has added an accessibility widget to its website. Cost: \$490 per year

All volunteers are trained during program onboarding to provide timely and reasonable language assistance, including on the use of the translation services.

Cancer Can't believes it has taken responsible steps to ensure quality access for LEP persons to its transportation programs and does not anticipate implementing any further measures to improve LEP access at this time but will continue to grow and build relationships with LEP providers and will make adjustments as needed.

Monitoring and Updating the LEP Plan. This plan is designed to be flexible and easily updated. Cancer Can't will follow the Title VI program update schedule for monitoring and updating the LEP plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the languages needing translation services?

- Is there still a need for continued language assistance for previously identified programs? Are there other programs that should be included?
- Have available resources, such as technology and staff changed?
- Were there any complaints received?

Safe Harbor Provision

According to the US Department of Justice's (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), a recipient of federal funds will provide written translation of vital documents for language when the LEP population constitutes five percent (5%) or 1,000 persons of the total population served by the agency. As of the 2019 ACS 5-year estimates, combined with the Cancer incident report, Cancer Can't has determined the LEP population is less than 1,000 persons of our total population served.

Transit-Related Committees, Councils and Boards

Title VI regulations require that the Title VI plan include a table depicting the membership of any transit-related non-elected committees, councils, and boards, broken down by race, and the process the agency uses to encourage the participation of minorities on such committees. Cancer Can't has no transit-related non-elected committees, councils, or boards.

Equity Analysis of Facilities

Title VI regulations require that the Title VI plan include an equity analysis if the agency has constructed a facility, such as a vehicle storage facility, maintenance facility, or operations center. Cancer Can't has not constructed any such facilities that would require a Title VI equity analysis.