



Community Planning & Permitting Transportation Division Title VI & LEP Plan

May 23, 2023

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Boulder County

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1 INTRODUCTION

Boulder County Title VI and Limited English Proficiency Plan

Equity is a core value of Boulder County and our mission to provide access to safe, affordable, reliable, and sustainable transportation choices for people of all ages, abilities, backgrounds, and incomes. Boulder County adheres to and monitors contractor compliance with federal civil rights programs, including Title VI. Community Planning and Permitting Transportation Division (CP&P-TD) (CP programs, planning, and services implement the following Title VI program, related civil rights laws, and regulations. These requirements include oversight of subrecipients, contractors, and subcontractors. Boulder County monitors contractors for compliance as part of regular program and project management reviews.

This Limited English Proficiency (LEP) and Title VI Plan for Boulder County has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C.2000d), which provides 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 any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created 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)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Loretta King, Acting Assistant Attorney General, further strengthened the enforcement of Title VI in a memorandum dated July 10, 2009.

As a direct recipient of funds from the Federal Transit Administration (FTA), and a subrecipient through the Colorado Department of Transportation (CDOT), Boulder County has developed this Title VI and LEP Plan to ensure compliance with Federal LEP regulations including the FTA LEP handbook “Implementing the Department of Transportation’s Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient Persons.” This plan includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we

plan to take in the future to ensure meaningful access to our transit programs for persons with limited English proficiency.

Boulder County Public Works oversees county road maintenance and construction projects. This plan does not outline Public Works civil rights programs. PW uses a combination of local, state, and federal funds for their projects and works directly with Colorado Department of Transportation to ensure compliance civil rights requirements for the Federally funded projects.

2 TITLE VI

NON-DISCRIMINATION POLICY STATEMENT

It is the policy of Boulder County Community Planning and Permitting (“CP&P”) that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the CP&P as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the CP&P, including its contractors and anyone who acts on behalf of the CP&P. This policy also applies to the operations of any division to which the CP&P extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, 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, national origin, sex, disability, or age 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. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42

U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

COMPLIANCE HISTORY

There are no outstanding lawsuits or complaints naming Boulder County that allege discrimination based on race, color, or national origin with respect to transportation programs, planning, or services.

There are currently no pending construction projects which would negatively impact minority communities being performed by Boulder County.

CP&P-TD has a monitoring system for contracted transit services, to ensure compliance with Title VI.

- Each year subrecipients must provide Boulder County with an FTA Civil Rights Assurance/Signed Assurance that all records and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and maintained;
- Each subrecipient must implement a Title VI complaint process and provide Boulder County with a list of active lawsuits and Civil Rights Complaint summary alleging discrimination on the basis of race, color or national origin;
- Each subrecipient must post its Title VI Policy Statement in prominent, conspicuous and accessible locations throughout its facilities;
- Subrecipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of programs and activities for individuals who are Limited English Proficient (LEP).

Figure 1 - Boulder County – List of Investigations, Complaints, and Lawsuits

	Date	Summary of the Basis of Complaint	Status	Actions Taken
	N/A			
	N/A			
	N/A			

NOTIFICATION TO THE PUBLIC

Boulder County posts its Title VI & General Nondiscrimination Notice on its ADA, EEO, and Title VI Notices page on the website. There is a link to this page on the footer of all Boulder County web pages under “Policies & Contact Us.” The Title VI & General Nondiscrimination Notice includes instructions on how to file a Title VI discrimination complaint. The Title VI & General Nondiscrimination Notice to Public can be found in Appendix A and the Title VI Complaint Form in Appendix B.

Boulder County will post notices on how to submit a Title VI complaint on contracted buses providing services, at County offices within the service area and on the County’s website. Below lists possible County locations where public notices could be posted if the transit service is in proximity to the location:

- Courthouse: 1325 Pearl Street, Boulder, CO, 80302
- Community Planning & Permitting: 2045 13th Street, Boulder, CO, 80302
- Southeast Hub: 1755 S. Public Road, Lafayette, CO, 80026
- St. Vrain Community Hub: 515 Coffman St, Longmont, CO 80501

3 ORGANIZATION, STAFFING, AND STRUCTURE

The Director of the CP&P, an appointed position that reports directly to the Board of County Commissioners, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all CP&P employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

Julia Larsen, Boulder County’s Human Resources Manager, performs the duties of the Title VI Coordinator and ensures CP&P’s implementation of the Title VI program.

The Title VI Coordinator is responsible for:

- Ensuring that a Title VI plan and annual reports are submitted on the agency’s behalf;
- Developing procedures for the prompt processing and disposition of complaints;

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- Investigating complaints, compiling a complaint log, and reporting to CDOT and FTA.
- 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;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

Figure 3 – Primary Program Area Description & Review Procedures

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Mobility Programs	Provides multimodal transportation programs and support services. Works with community-based organizations, local governments, schools, state, federal and regional partners to secure funding.	Mobility programs are funded in part by state or federal funds, FHWA funds for vision zero and safe routes programs, FTA funds for mobility management programs.	Mobility programs staff are aware of CP&P Title VI complaint process and, as appropriate, can refer members of the public to CP&P Title VI complaint process.
Planning	Provides multi-modal transportation systems planning. Works with state, federal and regional partners to secure transportation funding.	Planning projects are funded in part by state or federal funds. Planning staff coordinate planning projects and implementation plans with Boulder County Public Works, local, regional, and state partners.	Planning staff are aware of CP&P and Public Works Title VI complaint processes and, as appropriate, can refer members of the public to CP&P Title VI complaint process.
Transit Operations	Contracts, provides transit operations, and works with local, regional, state, and federal partners	Transit operations staff oversee the service planning, scheduling of transit services, and coordination with other regional transit providers. Transit operations staff oversee contracting for services, FTA compliance monitoring, and public engagement efforts for service changes and seasonal recreation shuttles.	Transit operations staff are aware of CP&P Title VI complaint process and, as appropriate, can refer members of the public to CP&P Title VI complaint process.

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Business Operations	Helps to develop CP&P goals, policies and procedures; prepares, administers and monitors CP&P budget; administers the operation of CP&P, including managing the administrative staff, primary point of public contact with CP&P, and overseeing the CP&P contracts.	Business operations works with transportation staff to ensure all relevant contracts include provisions specifying the federal certifications and assurances required. Communications staff are a point of contact for the public and receives public complaints regarding CP&P-TD programs, planning projects, or transit operations.	Upon receipt of a complaint related to CP&P mobility programs, planning projects, transit operations, bid process or contracting, Boulder County's Title VI Coordinator contacts the Business Operations Division Manager to assist with processing and investigating the complaint. Communications staff are aware of CP&P Title VI complaint process and, as appropriate, can refer members of the public to CP&P Title VI complaint process.
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PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

A summary of the public outreach and involvement activities that Boulder County Transportation has conducted between 2020-2022 can be found in Appendix F: Summary of 2020-2022 Outreach and Engagement Activities.

TITLE VI COMPLAINT PROCEDURES

Julia Larsen, Boulder County's Human Resources Manager and Title VI Coordinator, maintains discrimination complaint forms related to Title VI discrimination. Upon finalization of the Title VI complaint procedure, notification of the complaint procedure, form, and contact information shall be provided on CP&P's website.

The CP&P Mobility for All Program Manager and CP&P Business Operations Division Manager are Julia Larsen's initial points of contact regarding Title VI complaints that have been received. The CP&P Communications Specialist is the primary point of contact for the public and becomes involved any time a member of the public complains of the County's provision of programs, planning, and services through the CP&P-TD. The Communications Specialist is aware of CP&P's Title VI complaint process and, as appropriate, can refer members of the public to CP&P's Title VI complaint process. The CP&P Business Operations Division Manager is the primary point of contact for contractors who do work for CP&P. The CP&P Business Operations Division Manager is aware of CP&P's Title VI

complaint process and as appropriate, can refer members of the public to CP&P's Title VI complaint process.

All the CP&P and Boulder County website's pages can be translated into over 100 languages through the Google translate button, which is found at the top righthand corner of the webpage. Although the Title VI complaint form and related notice form are not currently translated into Spanish, once finalized, CP&P will provide Spanish-language versions of these forms.

FACILITY SITE EQUITY ANALYSIS

Boulder County does not currently have any transit facilities and as such we have not conducted facility site equity analyses. If we change policy directions, we will follow FTA guidance on facility site equity analyses.

4 LIMITED ENGLISH PROFICIENCY AND LANGUAGE ACCESS PLAN

This Limited English Proficiency (LEP) Plan for Boulder County has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides 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 any program or activity receiving federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, “Improving Access to Services for Persons with Limited English Proficiency,” was created 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)...” President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of federal funds, Boulder County has developed this LEP Plan to ensure compliance with federal regulations. It includes an assessment of the LEP needs of our

area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to federally funded programs by persons with LEP.

LEP POLICY

It is Boulder County's policy to ensure that our programs and activities, normally provided 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 right Act of 1964. Boulder County will, to the maximum extent feasible in its official deliberations and communications, community outreach and related notifications, provide appropriate alternative non-English formats to ensure LEP persons have access to information and services.

LIMITED ENGLISH PROFICIENCY NEEDS IN BOULDER COUNTY

The four Factor Analysis below evaluates the (1) number and percentage of LEP persons in Boulder County, and (2) the frequency, (3) nature, and importance of the contact Boulder County has with LEP persons in providing services, and (4) resources available and their cost.

Factor 1: Number and Percentage of LEP persons in Boulder County

According to American Community Survey (2019: ACS 1-Year Estimates Subject Tables), the population 5 years and over in Boulder County is estimated at 312,142, out of whom 45,397 (14.5%) people speak a language other than English. The table below contains more information regarding languages spoken in Boulder County:

Figure 2 - Language Spoken at Home

	Total (Estimate)	Percent (Estimate)	Speak English less than "very well" (Estimate)	Percent speak English less than "very well" (Estimate)
Population 5 years and over	312,142	(X)	11,809	3.8%
Speak only English	266,745	85.5%	(X)	(X)
Speak a language other than English	45,397	14.5%	11,809	26.0%

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SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	22,562	7.2%	6,098	27.0%
Other Indo-European languages	11,435	3.7%	1,935	16.9%
Asian and Pacific Island languages	9,926	3.2%	3,092	31.2%
Other languages	1,474	0.5%	684	46.4%

Source: [American Community Survey \(2019: ACS 1-Year Estimates Subject Tables\)](#)

The Census data in the table above shows there are a relatively low number of persons in Boulder County as well as municipalities in the metropolitan area that have difficulty speaking English. The majority of these persons speak Spanish as their primary language. Spanish is currently Boulder County's only language subject to DOJ Safe Harbor Provisions (see Title VI Circular 4702.1B at III-9). Boulder County will analyze the impact and importance of documents and translate vital documents, such as Title VI Public Notice and Complaint Forms and Service Change Notices.

Boulder County publishes a monthly Mobility for All newsletter in English and Spanish notifying the public of any significant transportation updates. Additionally, most of the Mobility for All social media posts and marketing materials are published in English and Spanish. We have two bilingual staff members who routinely engage with the public and track any additional request for translation or access to information or trainings in Spanish or other languages.

If receive requests to translate vital documents in other languages, we contract with a translator to provide language access upon request.

Factors 2: Frequency of Contact

The frequency of encounters with LEP individuals varies and depends on County Department, Organization and/or service being provided.

CP&P-TD assesses the frequency at which staff have or could possibly have contact with LEP persons. This may include the following: documenting phone inquiries, verbally surveying drivers, and dispatchers, as well as on-board passenger surveys.

The nature and importance of services being provided also depend on County Department, Organization, and/or service being provided.

Factors 2 & 3: The Frequency, Nature, and Importance of Contact

The frequency of encounters with LEP individuals varies and depends on County Department, Organization and/or service being provided. The nature and importance of services being provided also depend on County Department, Organization, and/or service being provided.

CP&P-TD provides transportation and mobility options across Boulder County. Our mission is to expand access to safe, affordable, reliable, and sustainable transportation choices for people of all ages, abilities, backgrounds, and incomes. We provide mobility options education and outreach and information and referral services. Promotional materials of mobility options and education opportunities are conducted in English and Spanish. Educational opportunities are provided in Spanish upon request.

Additionally, CP&P-TD leads planning projects to inform multimodal transportation priorities. Planning projects are evaluated to determine the impact they may have on individuals with LEP and if it is determined that there are potential impacts, we translate public engagement information into Spanish and offer simultaneous interpretation in a Zoom channel during virtual public meetings if determined applicable.

Boulder County contracts for transit services and includes Title VI, LEP, and other Federal requirements in contracts with subrecipients. CP&P-TD as a monitoring system for contracted transit services, to ensure compliance with Title VI & LEP. Boulder County provides assistance in complying with Title VI and LEP to subrecipients upon request or if a complaint is received. Boulder County evaluates the need for LEP marketing materials and provides dual language and translated marketing collateral if determined applicable.

The nature and importance of LEP contact is medium for planning projects to high for direct transportation supports, since transportation access is essential to independence and self-sufficiency.

Factor 4: Resources Available and Costs

The resources available and their costs vary by and depend on County Department, Organization and/or service being provided. Some services that are provided by Boulder County include, but are not limited to, the following items. Please contact Boulder County to inquire about the following services.

- Interpretation services contracted (verbal)
- Translation services contracted (written) and Spanish-speaking staff that can provide translation services on an as needed basis
- Technology services being used to reach non-English speaking populations (such as Google Translate, other software)

- Outreach services conducted in Spanish, other languages could be available through interpretation and translation
- List of marketing and collaterals for non-English speakers

Identifying Language Assistance Needs

When encountering an individual with limited English proficiency whose language is unknown, Boulder County staff and subrecipients use Language Identification Flashcards to identify the person's primary language. Copies are stored at CP&P front desk, on transit buses, and available at public meetings. Language Identification Flashcards, as developed by the U.S. Census Bureau, bear the phrase "Mark this box if you read or speak [name of language]" translated into 38 languages. The individual with limited English proficiency can then denote their language and staff can respond as appropriate to provide or obtain assistance and track language access needs.

Language Assistance Protocol

1. Oral Interpretation Services

Oral interpretation services will be provided to LEP persons in some form at no cost. If a bilingual employee is available, they will be called upon to translate. If the LEP person has an adult family member or friend that can provide interpretive services that will be an option. The LEP person will be informed that an interpreter is available at no cost if they wish to use that person instead of a family member or friend due to privacy issues, comfort, etc. If all other options have been exhausted, an outside interpreter or telephone service line will be utilized. Boulder County staff will ensure that the LEP person's choice is voluntary, and that they are aware of their options.

2. Language Identification Cards

Frequently survey drivers and other first line staff of any direct or indirect contact with LEP individuals. Census Bureau's "I Speak Cards" are available at in person public meetings and on vehicles to assist in identifying language support needs. While staff and drivers may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings and transit marketing materials. "I Speak Cards" can be found in Appendix C.

3. Telephone Assistance

Callers who are limited in their English-speaking abilities often have an English-speaking person present when they call. If this is the case, the English-speaking person will be asked if they are acting as the person's translator. If they are not, they will be asked what language the person speaks, and arrangements will be made for translation services to be available at an agreeable time for all parties. If the caller is unable to speak English and the language is recognizable, staff will find a bilingual

employee or will assist the caller to the greatest extent possible, which may involve setting up a time when a translator would be available.

4. Walk-in Assistance

A LEP person who walks into the office will be assisted to the greatest extent possible by Boulder County or subgrantee staff, or a bilingual employee, if available. Arrangements will be made for translation services to be available at an agreeable time for all parties.

5. Written Assistance

Boulder County staff will first try to assist the client to determine what documents they need or want. Once that has been identified, staff will find a translator to assist the client in completing the form for services. If it is a larger document they are interested in, such as something they would like to provide public comments on, the interpreter will work with the client to provide an overview of the document, discuss specific topics the client is interested in, and the interpreter can inform staff of the client's comments regarding the topic.

Staff Training

Current and incoming staff members whose jobs include interacting with the public are briefed on the Boulder County CP&P Limited English Proficiency Plan, trained in using the Language Identification Flashcards and provided with information on assisting people with limited English proficiency. Staff are also instructed to immediately inform the Mobility for All Program, who will maintain a record of language assistance requests so needs may be accurately assessed in the future.

5 SUBRECIPIENT MONITORING

Boulder County's subrecipients of federal financial assistance must also comply with Title VI of the Civil Rights Act of 1964. To meet its enforcement responsibilities under Title VI, Boulder County has implemented a subrecipient monitoring process. The Project Manager will confer with the Mobility for All Program to ensure that the following actions are taken to ensure that Boulder County and its subrecipients comply with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B:

- Each year subrecipients must provide Boulder County with a signed FTA Civil Rights Assurance (Subrecipient Title VI Policy Statement) that all records and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and maintained.

- Each subrecipient must implement a Title VI complaint process and provide Boulder County with a list of active lawsuits and Civil Rights Complaint summary alleging discrimination on the basis of race, color or national origin.
- Each subrecipient must post its Title VI Policy Statement in prominent, conspicuous, and accessible locations throughout its facilities.
- Subrecipients must take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP.

In general, subrecipients should have a public participation process that offers early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and low-income populations from effectively participating in a subrecipient's decision-making. Subrecipients must file documentation of their public participation plan with Boulder County. Each subrecipient further agrees to comply with and assure compliance by its third-party subcontractors at any tier under each grant, with all requirements of the FTA Title VI Program pursuant to FTA Circular 4702.1B, 49 CFR 21.5(b)(2), 49 CFR 21 .5(b)(7), and 49 CFR Part 21, Appendix C.

6 PUBLIC OUTREACH AND ENGAGEMENT

Boulder County strives for an open exchange of information and ideas between the public and decision makers in transportation planning processes. To ensure that BIPOC and persons with low incomes have meaningful access to the planning activities, the following measures are taken.

For any proposed significant service changes, the Boulder County will post public notices in the daily local newspaper, at County offices within the service area and RTD facilities covered by access agreements between the County and RTD, and on the County's website and social media outlets. Public hearings are advertised, and the County will strive to hold

those hearings at ADA-accessible and transit-accessible facilities. Below lists possible County locations where public notices could be posted:

- Courthouse: 1325 Pearl Street, Boulder, CO, 80302
- Community Planning & Permitting: 2045 13th Street, Boulder, CO, 80302
- Southeast Hub: 1755 S. Public Road, Lafayette, CO, 80026
- St. Vrain Community Hub: 515 Coffman St, Longmont, CO 80501

Boulder County identifies minority populations using local demographic data gathered through U.S. Census data reviewed annually; the use of community liaisons available with local public and private schools, places of worship, and employment centers; and local non-English media like radio stations and newspapers.

To communicate with and conduct outreach to Limited English Proficiency (LEP) individuals and minority populations, Boulder County utilizes its official website with translation services available; publishes occasional newsletters and press releases with available translation services; uses local business owners with various language skills and minority customer bases; uses broadcast media such as local Spanish language radio stations and newspapers; and consults multilingual individuals that work with the County.

Boulder County is committed to incorporating input from black, indigenous, and people of color (BIPOC) populations and LEP persons in our decision-making processes related to providing public services. Public services, at a minimum, are provided in both English and Spanish, and if necessary, can be provided in other languages by engaging multiple local residents and business owners or online translation services to remain all-inclusive and available to all persons. County staff are continually working to identify additional ways to reach LEP populations.

In 2020 Boulder County updated and adopted the Transportation Master Plan and in 2022 the coordinated human services transportation plan, which uses the working title, Mobility and Access for All Ages and Abilities. Outreach for these plans included flyers in English and Spanish, which were posted online and with community partners, especially serving historically underserved and marginalized communities, community conversations and open houses (virtual and in person) in English and Spanish. These plans also involved special engagement of the local coordination council, Mobility and Access Coalition (MAC), which includes several organizations that serve the needs of BIPOC, Limited English Proficiency (LEP) communities, individuals with disabilities, and populations with low incomes.

The membership of the MAC is not selected by Boulder County and therefore a table depicting the demographics of this council is not required.

7 APPENDICES

List of Appendices

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Appendix B: Title VI Complaint Form

Appendix C: Census Language Identification Cards

Appendix D: List of Bilingual CP&P Employees

Appendix E: Detailed Listing of Available Services

Appendix F: Summary of 2020-2022 Outreach and Engagement Activities

Appendix A: Notice to the Public

Boulder County operates its transportation programs, planning, and services without regard to race, color, national origin, or any other characteristic protected by law including Title VI of the Civil Rights Act of 1964. If you believe you have been subject to discrimination, please fill out the Title VI & General Nondiscrimination Complaint Form.

If you think that you have been subjected to discrimination, you may file a complaint within 180 days from the date of the alleged violation:

- Online Form: Title VI Complaint Form (Wufoo Form)
- Email: Title VI Coordinator, transit@bouldercounty.org
- Telephone: 303-441-3930
- Writing:

Community Planning & Permitting
Attn: Title VI Complaint
PO Box 471
Boulder, CO 80306

You may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Appendix B: Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact Boulder County’s Title VI Coordinator, transit@bouldercounty.org, 303-441-3930.

Complete and return this form to:
Community Planning & Permitting
Attn: Title VI Complaint
PO Box 471
Boulder, CO 80306

1. Complainant’s Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone (home): _____ (business): _____

5. Person discriminated against (if someone other than the complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

a. Race/Color o b. National Origin o c. Age o d. Gender o e. Income o

7. What date did the alleged discrimination take place? _____

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8. 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 needed.

9. Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Yes ☐ No ☐

If yes, check each box that applies:

Federal agency ☐ Federal court ☐ State agency ☐ State court ☐ Local agency ☐

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

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

CP&P Transportation Planning Division | Title VI & LEP Plan
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Signature

Date

Appendix C: Census Language Identification Cards

<div> <div>2004 Census Test</div> <div> United States Census 2010 </div> </div> <div>LANGUAGE IDENTIFICATION FLASHCARD</div>		
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողո՞ւմ ե՞սք նշում՞ կատարե՞ք այս քանակություն, կթե՞ խոսում՞ կամ՞ կաղտում՞ եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/>	ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/>	Mark this box if you read or speak English.	11. English
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

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<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องสี่เหลี่ยมที่พูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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Appendix D: Listing of Bilingual CP&P Employees

Community Planning and Permitting has several bilingual staff who are available to assist members of the public with limited English proficiency.

- Felipe Mosqueda Yanez, Mobility for All, Spanish Speaker, mobilityforall@bouldercounty.org, 720-564-2218
- Jessica Villena Sanchez, Mobility for All, Spanish Speaker, mobilityforall@bouldercounty.org, 720-564-2218
- Martha Perez, Code Compliance, Spanish Speaker, mperez@bouldercounty.org, 303-441-3930
- Angel Bond, Mobility for All, Russian Speaker, mobilityforall@bouldercounty.org, 720-564-2218

Appendix E: Detailed Listing of Available Services

Phone Language Interpretation Service

Boulder County contracts with CTS LanguageLink to provide phone interpretation when a member of the public speaks a language not spoken by Boulder County Staff. More detailed information is available for staff on Boulder County's internal Share Point site.

How to Access Over the Phone Interpretation Services

Step 1: Call 1 888-338-7394

Step 2: Enter Account Number, followed by the # sign

Step 3: Select 1 to be connected directly to your **Spanish** interpreter, or
Select 2 to be connected directly to your **Russian** interpreter, or
Select 3 to be connected directly to your **Vietnamese** interpreter, or
Select 4 to be connected directly to your **Somali** interpreter, or
Select 9 for **all other languages**

***If you require a 3rd party call, press 9 to reach a Customer Service Representative**

Step 4: Enter Your Phone Number (10 Digit Office Number), followed by the # sign

Written Translation Services

Boulder County contracts with Translation Links and Language USA to provide written translation. More detailed information is available for staff on Boulder County's internal Share Point site.

How to Access Written Translation Services

Step 1: Email: ignacio@translationlinks.com or sendto@languageusa.com

Step 2: Each request should include the target language, the billing department or billing information, and any specific instructions about the project. A deadline is also recommended.

About the Service:

- Available Monday through Friday, 7:00 am to 4:30 pm.
 - Emergency requests can be processed after hours.
 - Requests from a Boulder County Email will be honored.
- Languages Currently being translated to:
 - Arabic, Bengali, Bosnian, Burmese, Chinese - Simplified, Chinese - Traditional, Croatian, Czech, Dari, English, Farsi, French, German, Gujarati,

Haitian Creole, Hawaiian, Hindi, Hmong, Ilocano, Indonesian, Japanese, Khmer, Kinyarwanda, Korean, Kurdish, Lao, Mongolian, Nepali, Pashto, Polish, Portuguese, Punjabi, Romanian, Russian, Somali, Spanish, Swahili, Tagalog, Tamil, Thai, Turkish, Ukrainian, Urdu, Vietnamese

Virtual/In-Person Interpreting

Boulder County contracts with multiple interpretation services to include American Sign Language Interpretation services. More detailed information is available for staff on Boulder County's internal Share Point site.

- Each department/office is responsible for covering the cost of interpretation services and must have a funding source.
- Multiple departments/offices are utilizing master contracts. It is recommended that each Department/Office administer its cost tracking - **it's recommended you use the translation account code in Oracle to make tracking easier/**
- Departments/offices do not need to worry about capping vendors' contract limits but do need to track their own expenditures.
- LOTS means Languages other than Spanish

Company	Costs	Email
1 World Translation, Inc. 2501 W. Burbank Boulevard, Suite 311, Burbank, CA 91505	Hourly rates are \$60 - \$120	carolina@oneworldtranslation.com
Cesco Linguistic Services 1355 S. Colorado Blvd Ste C-901, Denver, CO 80222	Rates Vary - See Proposal Consecutive Interpreting \$50 - \$75 per hour Simultaneous Interpreting is \$75 - \$140 per hour, and day rates are available Other fees apply	GSiebach@cescols.com GContreras@cescols.com SLank@cescols.com sitc@cescols.com
Deaf Communication Services 311 Spaulding Lane, Fort Collins, CO 80524	On-Site: \$70 per hour – 2-hour minimum Video - \$75 per hour/ \$1.65 per minute - 1 hour minimum	Darrell@deafcommunicationservices.com Sharon@deafcommunicationservices.com

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<i>Interpreters Unlimited, Inc.</i> 10650 Trenea Street, San Diego, CA 92131	Rates Vary - See Proposal On-Site \$110 per hour Virtual - \$55 - \$80 per hour Video Remote \$1.25 per minute	desiree.lewis@interpreters.com shamus.sayed@interpreters.com
<i>Natural Languages, LLC.</i> 924 Bergen Avenue #286, Jersey City, NJ 07306	Rates Vary - See Proposal Spoken Language \$64.74 - \$94.74 per hour Sign Language - \$84.74 - \$104.74	rm2@naturallanguages.net lp2@naturallanguages.net

Appendix F: Summary of 2020-2022 Outreach and Engagement Activities