



Cancer Can't

**TITLE VI of the Civil Rights Act of 1964
Implementation Plan
For the Years 2025-2027**

Reviewed and Approved by: Rebecca VanKeulen, Founder and President_



Date: 8/21/25

TITLE VI PLAN 2025-2027

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 Cant's policy to utilize its best efforts to ensure 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 Cant'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 Cant'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 the responsibility for making all of Cancer Cant's Equity, Diversity and Inclusion initiatives including Cancer Cant's Title VI program, a success. Cancer Can't will notify the public of their rights under Title VI through its website.

<https://www.cancercant.com/non-discrimination>

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 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 Cancer Can't at (509)731-3076

Si necesita información en otro idioma, comuníquese con Cancer Can't al (509) 731-3076.

Для получения информации на другом языке звоните по тел. (509) 731-3076

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 731-3076

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.

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 regarding 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 509-230-3525
- 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 2023 American Community Survey 5-Year Estimate of poverty status. The data shows that most areas served by Cancer Can't's programs have poverty rates greater than the Washington state average.

Poverty Status in the past 12 months

	Total Population	Population Below Poverty Level	Percent Below Poverty Level
Washington State	7,606,327	753,455	9.9%
Spokane County	530,313	64,956	12.2%
Lincoln County	11,160	1,162	10.4%
Stevens County	47,013	6,072	12.9%
Pend Orielle County	13,623	1,853	13.6%
Idaho State	1,843,325	196,060	10.6%
Kootenai County	188,039	18,234	10%
Bonner County	48,902	5,231	10.7%

Data from the US Census Bureau 2023 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		Lincoln County		Stevens County		Kootenai County		Pend Oreille County		Bonner County	
Total Population	539,339		11,300		47,470		188,323		14,361		52,547	
White	485,897	87.4%	10,470	92.6%	42,300	89.1%	176,646	93.8%	12,971	90.3%	49,845	94.86%
Black or African America	11,118	2.0%	34	.3%	330	.7%	941	.5%	113	.8%	196	.37%
American Indian & Alaska Native	10,562	1.9%	260	2.3%	2,610	5.5%	2,448	1.3%	565	3.9%	520	.99%
Asian	13,342	2.4%	90	.8%	0	0%	2,259	1.2%	164	1.1%	482	.92%
Native Hawaiian & Pacific Islander	33,356	.6%	23	.2%	0	0%	376	.2%	24	.2%	78	.15%
Two or More Races	26,685	4.8%	441	3.9%	1,710	3.6%	5,649	3.0%	524	3.7%	1,426	2.71%
Hispanic or Latino	41,696	7.5%	508	4.5%	2,090	4.4%	11,487	6.1%	614	4.28%	2,171	4.13%
White alone, not Hispanic or Latino	452,540	81.4%	10,068	89.1%	40,300	86%	166,854	88.6%	12,576	87.5%	48,057	91.46%

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

Cancer Can't has included a phone number to call for LEP services on their website at www.cancercant.com. The following are outreach activities to minority and LEP populations accomplished by Cancer Can't:

Cancer Can't Activity
Partner with ASAP Translations for any visually impaired.
Work with cancer clinics to inform them on Cancer Cant's LEP programs offered to patients who participate in Cancer Cant's transportation program.
Worked closely with all cancer clinics and hospitals in the Greater Spokane Area to ensure those individuals without homes have access to transportation to seek medical services.
Participated in the Fred Hutch Spokane Cancer Consortium that includes agencies representing low income, minority, and LEP. This Consortium works together to collect & prioritize data about barriers to access, complex needs/ gaps in services, solutions to cultural disparities, and geographic service deficiencies
Conducted outreach to Rural Resources, Special Mobility Services, Home Health Agencies, Community Resource Centers, rehab facilities.
Conducted Outreach to various Senior Centers.
Conducted Outreach to various Community Centers.
Conducted outreach with community partners such as Long-Term Care Facilities, Aging and Long-Term Care and Community Health Worker Networks
Conducted outreach to the health districts.
Cancer Cant's LEP service number is included in our transportation brochure that is located in cancer clinics in Spokane.

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

- 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.

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 2018-2022 American Community Survey of the US census, Incidence data provided by the National Program of Cancer Registries 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 consultation with local cancer clinics, including Cancer Care Northwest, MultiCare and Providence staff. Cancer Can't 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.***

Cancer Can't interviewed operations staff and found that the transportation program is rarely used by LEP residents. Census information confirms that the areas served by Cancer Can't routes have a small number of residents who lack proficiency in English. Cancer Can't interviewed social workers at the primary oncology clinics (Cancer Care Northwest, MultiCare and Providence) and 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.

**2023 ACS 5 Year Estimates United States Census Bureau
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	513,629	3,586	29.2%	4,787	36.3%	4,172	43.8%	971	45.2%
Kootenai County	137,933	818	22.9%	229	18%	297	38.2%	4	2%
Bonner County	47,239	278	33.1%	66	9.1%	40	26.7%	9	60%
Lincoln County	10,685	15	8%	27	22.9%	44	40.4%	0	0%
Stevens County	45,130	133	22.6%	376	49.5%	112	69.1%	9	10.7%
Pend Oreille County	13,218	8	7.8%	7	12.7%	7	13.7%	0	0%

**2018-2022 Washington State Cancer Incidence Report
All Races, Ages and Sexes Included**

County	Average Annual New Cancer Cases Reported	Incidence Rate per 100,000
Spokane County	11,903	363.9
Stevens County	1,210	328.9
Pend Oreille County	401	342.2
Lincoln County	119	406.1
Kootenai County	149	115.1
Bonner County	48	111.6

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

Cancer Can't consulted Social Workers at Cancer Care Northwest, MultiCare and Providence 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. 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 has the following resources for LEP persons:

- Cancer Can't contracts with ASAP Translation to provide interpretation services. Cost: \$13.75-\$17 per 15 minutes.
- Cancer Can't contracts with ASAP Translation for document translation. Documents can be translated into English, Russian, Vietnamese and Marshallese. Cost: \$.10-\$.30 per word.

All volunteers and Cancer Can't employees 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 adjust 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 includes 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 includes 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.