



NWSBW, LLC
DBA Northwestern Stage Lines
DBA Boise Winnemucca Stage Lines

TITLE VI PLAN

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Introduction

NWSBW LLC, DBA Northwestern Stage Lines, DBA Boise Winnemucca Stage Lines (herein collectively referred to as Northwestern) is a recipient of funds from Federal DOT agencies, including the Federal Transportation Authority, as well as funds from State Transportation agencies, including the Idaho Public Transportation Office, the Montana Department of Transportation, the Wyoming Department of Transportation, the Utah Department of Transportation, and the Nevada Department of Transportation the Washington Department of Transportation and the Oregon Transportation Department. Recipients of federal and state funding must comply with the requirements of Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, regulations, and authorities. The Title VI Plan (herein referred to as Plan) describes how Northwestern effectively prevents nondiscrimination in the delivery of its programs, services, and activities. The Plan includes the staffing structure for Northwestern Title VI Nondiscrimination program as well as the policies, procedures, and practices Northwestern has in place to comply with Federal and State nondiscrimination requirements. The Plan is regularly monitored and updated to reflect the growth and changes of Northwestern Title VI Nondiscrimination program as it changes and grows. Anyone wishing to provide input into Northwestern Title VI program or activities is encouraged to contact Northwestern Title VI Coordinator by calling (509)838-4029, emailing greg.hendricks@busnws.com, or by writing to PO Box 566, Rexburg ID, 83440, attn. Title VI Coordinator.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance (42 U.S.C. Section 2000d). The Civil Rights Restoration Act of 1987 (Public Law 100-259 [S. 557] March 22, 1988) clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, and or contractors, whether those programs and activities are Federally funded or not.

Northwestern is committed to ensuring meaningful and equal access to its programs and activities for all individuals, regardless of national origin or language proficiency. Although the United States has declared English as its national language, Northwestern recognizes that language barriers can impede access to essential services and is dedicated to providing language assistance to Limited English Proficiency (LEP) individuals. The State of Nevada has reinforced this commitment through Senate Bill (SB) 318, which places renewed emphasis on Title VI compliance to ensure that all individuals, regardless of language proficiency, can fully access benefits.

Organizational Structure

Northwestern is represented by its owners and Managing Members.

Managing Member:

Seat 1 Jacob Price

Seat 2 Lori Price

The following transportation components are offered in each of the areas served: Public Transportation Fixed Route including ADA compliant options.

The Agency provides public transportation to communities in Idaho, Utah, Wyoming, Montana, Nevada, Arizona, Oregon and Washington.

Northwestern Leaders established the vision, strategic plan, policies, and goals for the agency. As the legislative body, they are responsible for establishing the laws, policies, and guidelines under which Northwestern operates, and approves how Northwestern's funds will be expended. The Northwestern Operations Manager, Jacob Price, is responsible for implementing the policies adopted by Northwestern.

Title VI Coordinator

Title VI Coordinator

The Title VI Coordinator is responsible for providing leadership, direction, and policy to ensure compliance with Title VI of the 1964 Civil Rights Act. The Title VI Coordinator plans to develop, monitor, and enforce standards for compliance in Northwestern's programs, services, and benefits.

Northwestern has appointed the Director of Compliance & Operations as Title VI Coordinator. The contact information for the agency's Title VI Coordinator is:

Mail: PO Box 566, Rexburg ID, 83440 Fax: (208) 996-2055

Email: Greg.Hendricks@nwsbus.com Tel: (509) 838-4029

In Person: 785 S. Railroad Ave, Sugar City, ID 83448

Title VI Coordinator's Responsibilities and Program Administration

As authorized by Northwestern, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring Northwestern's compliance with Title VI requirements as follows.

- Process the disposition of Title VI complaints received and forward them to the correct authority.
- Assisting program personnel to correct Title VI problems or discriminatory practices or policies found through self-monitoring and review activities.
- Ensuring that Title VI requirements are included in policy directives and that the procedures used have built in safeguards to prevent discrimination.
- Direct efforts to coordinate the development and implementation of a Title VI and related statutes training program.
- Collect statistical data (race, color, or national origin) of participants in and beneficiaries of Northwestern programs, (e.g., affected citizens, and impacted communities).

- Conduct annual Title VI reviews of Northwestern to determine the effectiveness of program activities at all levels.
- Conduct or facilitate training programs on Title VI and other related statutes for Northwestern employees.
- Prepare a yearly report of Title VI accomplishments and goals, as required.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Identify and eliminate discrimination.
- Establish procedures for promptly resolving deficiency status and writing the necessary remedial actions, all within a period not to exceed ninety business days.

The Title VI Coordinator oversees the day-to-day administrative requirements of the Plan. The Title VI Coordinator also serves as the individual to whom complaints alleging discrimination are submitted and is responsible for communicating and coordinating with managers and supervisors on all civil rights activities as well as coordinating training for staff. The Title VI Coordinator is also responsible for working with the directors to monitor procedures and practices related to projects and services to ensure the programs are operated and the services are provided fairly, equitable, and in a nondiscriminatory manner. Managers and supervisors are responsible for providing program activity information to the Title VI Coordinator on an ongoing and timely basis.

Northwestern organizational chart shows the Title VI Coordinator has direct access to the agency's highest authority on all Title VI matters.

Delegation of Authority

The Operations Manager has delegated all compliance authorities for Northwestern Title VI program to Northwestern Title VI Coordinator, Greg Hendricks. The Title VI Coordinator reports to the Operations Manager on Title VI issues.

Policy Overview and Objectives

In Compliance with Title VI of the Civil Rights Act 1964 and other nondiscrimination authorities Northwestern assures through its policies and procedures in the Policy Statement (**Attachment 1**), that no person shall on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Northwestern program, or Northwestern sponsored program or activity. Questions about the Northwestern' Title VI Program may be directed to the Northwestern Title VI Coordinator by calling (509) 838-4029, emailing greg.hendricks@busnws.com, or by writing to PO Box 566, Rexburg ID, 83440, attn. Title VI Coordinator.

Northwestern displays a Title VI Notice to Beneficiaries on our website and in public areas at Northwestern locations.

Annual Title VI Certification and Assurances

Operations Manager has signed the Standard DOT Title VI Certifications and Assurances in accordance with their Annual Certifications and Assurances submission 23 CFR § 200.9 (a).

Program Area Reviews

Northwestern Title VI Coordinator reviews the Title VI program as needed to ensure implementation of the Title VI plan in all areas of the organization and ensure nondiscrimination. In addition, the Title VI Coordinator reviews the operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate. The Title VI Coordinator will review additions and changes to the policies and directives, as part of their Title VI plan, to ensure that the content is nondiscriminatory. Review Logs are used to track review activities of new policy, or changes to existing policy.

The cornerstone of Title VI compliance in all programs is outreach and public involvement. Northwestern has a Public Involvement Program that is designed to provide early, continuous, and extensive outreach to all communities, but particularly to ensure that project selection does not subject any population to disproportionately high and adverse effects.

Northwestern uses an annual process to review Title VI activities to ensure nondiscrimination. The Title VI Coordinator may examine data for nondiscrimination in the following areas.

Fare Equity and Service Changes (For fixed route and UZA of 200,000 or more)

Within the public transit sphere, Title VI compliance ensures that fare equity and service changes do not disproportionately affect populations based on the Title VI protected classes of race, color, or national origin. Fare equity and service changes are crucial for promoting fairness and equality in public transportation. Activities to ensure nondiscrimination may include, but are not limited to:

Equity Analysis

Before implementing fare changes, an equity analysis is conducted. This analysis involves:

- Using demographic data and ridership patterns to evaluate the impact of fare changes.
- Establishing policies to define major service changes, adverse effects, disparate impacts, and disproportionate burdens.

Set System-Wide Service Standards

System-wide service standards are established to ensure that public transit services are fair, reliable, and accessible to all populations. These standards define critical elements such as vehicle load, vehicle headway, on-time performance, and service availability. Northwestern utilizes these standards to maintain compliance with Title VI, promoting nondiscrimination across all transit services. By defining clear benchmarks and policies, Northwestern can systematically review and adjust services to meet the diverse needs of the community, ensuring equitable distribution of amenities and fair vehicle assignments. System-Wide Service Standards may include:

- Vehicle Load: Define the maximum number of passengers per vehicle to ensure comfort and safety.
- Vehicle Headway: Set the frequency of service for each route to ensure consistent access.
- On-Time Performance: Establish benchmarks for service reliability and punctuality.
- Service Availability: Ensure equitable distribution of transit services across geographic areas.

Set System-Wide Service Policies

- Distribution of Transit Amenities: Ensure amenities like shelters, benches, and lighting are equitably distributed.

- **Vehicle Assignment:** Assign vehicles to routes without discrimination, ensuring equitable access to newer or better-equipped vehicles.

System-Wide Service Standards and Policies are crucial for Northwestern as they establish a framework to ensure fair, reliable, and accessible public transit services. By defining critical elements such as vehicle load, vehicle headway, on-time performance, and service availability, these standards help maintain compliance with Title VI, promoting nondiscrimination across all transit services. Furthermore, these policies ensure the equitable distribution of amenities and fair vehicle assignments. They allow Northwestern to systematically review and adjust services to meet the diverse needs of the community, providing all populations with equal access to safe and reliable transit services.

Public Participation

Northwestern engages the community in the decision-making process. Northwestern ensures that outreach is early, continuous, and extensive to all communities, guaranteeing that project selection does not subject any population to disproportionately high and adverse effects. Activities to ensure nondiscrimination may include, but are not limited to:

- **Community Engagement:** Actively involve diverse community groups in discussions about transit services.
- **Feedback Mechanisms:** Establish methods for collecting and analyzing public feedback on transit services.
- **Inclusive Outreach:** Ensure outreach efforts encompass minority and low-income populations.
- **Transparency:** Provide clear and accessible information about service standards and changes.
- **Meeting Accessibility:** Hold public meetings at accessible locations and times to maximize participation.

Data Collection

We collect and analyze demographic data and ridership patterns to evaluate the impact of fare changes. This data helps us understand the needs and usage patterns of different population groups and tailor our services accordingly. Activities to ensure nondiscrimination may include, but are not limited to:

- Collect demographic data to understand the impact of fare changes on different population groups.
- Analyze ridership patterns to tailor services to meet the needs of diverse communities.
- Use data to assess whether changes result in disparate impacts or disproportionate burdens.
- Ensure that data collection methods are inclusive and representative of all community groups.

Maintenance

While maintenance isn't directly tied to Title VI, it plays a role in ensuring equitable access. Regular upkeep of transit facilities and vehicles ensures that all populations have access to safe and reliable services.

Activities to ensure nondiscrimination may include, but are not limited to:

- Regularly inspect and repair equipment to guarantee safe and reliable service for all riders.
- Monitor and maintain accessible features, such as ramps, elevators, and seating, to ensure they are functional and meet the needs of individuals with disabilities.
- Ensure that signage and information displays are clear, visible, and available in multiple languages to accommodate riders with limited English proficiency.

- Conduct routine audits to ensure compliance with ADA standards and other accessibility regulations.
- Implement preventive maintenance schedules to avoid service disruptions that disproportionately affect certain populations.
- Train maintenance staff on nondiscrimination policies and the importance of maintaining accessible services for all community members.
- Use feedback and complaints from riders to continually improve maintenance practices and address any barriers to service.

Contractor and Consultant Reviews

In addition to completing Title VI training, Northwestern directors, managers, and supervisors in each service area are responsible for familiarizing themselves with the requirements of Title VI and for ensuring that departmental contractors, consultants, and vendors are complying with the requirements of Northwestern's Title VI Program. They are responsible for promptly reporting issues or complaints concerning Title VI and related statutes to the Title VI Coordinator and for assisting the Title VI Coordinator in their efforts to implement all requirements, internally and externally. They are also responsible for coordinating with the Title VI Coordinator on any proposed changes to operating procedures, instructional memoranda, policies, and manuals, etc. that relate to Title VI.

Should noncompliance be found, Northwestern shall work with the contractor, consultant, or vendor to come into voluntary compliance. If that is unsuccessful, Northwestern shall take additional action to ensure compliance, which may include:

- Withholding payments to the contractor under the contract until the contractor complies
- Cancelling, terminating, or suspending a contract, in whole or in part

Data Collection

In accordance with 49CFR 21.9 and 23 CFR 200.9 Federally assisted recipients, including subrecipients, are required to collect and maintain statistical data by race, color, national origin, and sex of affected communities, and participants and beneficiaries of federal aid.

Northwestern is guided by the Federal regulations to collect statistical data on the race, color, and national origin of participants in and beneficiaries of its programs. Accordingly, Northwestern gathers, analyzes, and maintains statistical data on race, color, national origin, sex, age, and disability of participants in and beneficiaries of Northwestern (e.g., relocatees, affected populations, and participants) to ensure equitable benefits and burdens to the affected population.

Northwestern will collect appropriate data during acquisition and relocation of real property processes, as needed, and will provide opportunities for participants at public meetings to provide associated data, as necessary. This information will be retained per the federal document retainage period guidelines and will be made available to authorizing agencies during reviews.

Collecting, analyzing, and maintaining statistical data are crucial elements of the Title VI Program as they constitute an effective mechanism by which to numerically verify the distribution and impact of program funding.

Each federal program area is responsible for collecting Title VI nondiscrimination related data and analyzing the data annually to identify and address any trends or patterns of discrimination. Data collection is key to ensuring that public works programs, services, facilities, and projects effectively meet the needs of all people without discrimination.

Training

Northwestern utilizes approved content training and accompanying resources for all Northwestern employees to have a basic understanding of the requirements of Title VI and the Northwestern Title VI Nondiscrimination Plan. Staff Awareness training will be held upon hire, and annually for general employees and for managers and supervisors, as required.

Northwestern provides training, presentations, and resources that provide comprehensive information on the Title VI requirements, its application to specific program operations, identification of Title VI issues, and the resolution of potential or formal complaints.

Additionally, the Title VI Coordinator and liaisons meet annually, or more often if warranted, to discuss practical solutions to Title VI issues, and the Title VI Nondiscrimination Plan.

Title VI Nondiscrimination Complaint Procedure

Complaint Procedures

Northwestern has developed procedures for investigating and tracking Title VI complaints filed against them and has made their procedures for filing a complaint available to members of the public. Northwestern has also developed a Title VI complaint form (**Attachment 2**), and the form and procedure for filing a complaint are available on the website at: northwesternstagelines.com/.

Any person who believes that they have been discriminated against on the basis of race, color, or national origin by Northwestern may file a Title VI complaint with Northwestern, the Federal Transit Administration, the Washington Department of Transportation, the Nevada Department of Transportation, the Utah Department of Transportation, the Wyoming Department of Transportation, or the Montana Department of Transportation, by completing and submitting the Title VI Complaint Form.

The complaint must be filed within 180 days of the alleged discrimination and include the date the alleged discrimination became known to the complainant or the last date of the incident. The complaint must be written and signed by the complainant and shall include:

- The Complainant's name, address, and phone number
- A detailed description of the alleged incident that led the complainant to believe discrimination occurred
- The date of the alleged act of discrimination, the date when the complainant(s) became aware of the alleged discrimination, the last date of the conduct, or the date the conduct was discontinued
- The names and job titles of those parties involved in the complaint
- The facts and circumstances surrounding the alleged discrimination and the basis of the complaint (i.e., race, color, national origin, or sex)
- Names and contact information of people whom the investigator can contact for additional information to support or clarify the allegations
- The corrective action being sought by the complainant
- Complaints may be filed by one of the following methods:
 - By completing and signing the Complaint Form and delivering it in person or by mail
 - By emailing or mailing the Complaint Form and sending the signed original to the Title VI Coordinator
 - By calling the Title VI Coordinator, where information obtained will be used to complete the Complaint Form and, subsequently, forwarded to the complainant for review, signature, and return

All Title VI complaints are forwarded to its respective state jurisdiction at WashDOT, NDOT, UDOT, WyDOT, MDT ODOT, ITD, or to FTA for investigation within twenty-one (21) days of receipt of complaint.

Northwestern

Title VI Coordinator
P.O. Box 566
Rexburg ID, 83440
509-838-4029

Office of Civil Rights FTA

1200 New Jersey Avenue,
SE Washington, DC 20590
United States

ITD**Office of Civil Rights**

11331 W Chinden Blvd, Boise,
ID 83714
PO Box 7129, Boise, ID
83707-1129
CivilRights@itd.idaho.gov

MDT

Office of Civil Rights
2701 Prospect Avenue
PO Box 201001
Helena, MT 59620-1001
(406) 444-6334
mdtcrform@mt.gov

NDOT

Office of Civil Rights
4615 W. Sunset Road
Las Vegas, NV 89101
(702) 730-3305
tlewis@dot.nv.gov

ODOT

Office of Civil Rights
Title VI Specialist
Oregon Department of
Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871 USA

UDOT

Office of Civil Rights
Title VI Specialist
P. O. Box 141520
Salt Lake City, Utah
84114-1520
(801) 965-4384
civilrights@utah.gov

WashDOT

Office of Civil Rights
Title VI Specialist
P.O. Box 47314
Olympia, WA 98504

WyDOT

Office of Civil Rights
Title VI Coordinator
5300 Bishop Blvd.
Cheyenne, WY 82009
307-777-4457
DOT-civilrights@wyo.gov

Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).

Any person who believes that they, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities prohibited under Title VI based upon race, color, sex, age, national origin, or disability may file a written complaint with Northwestern.

Limited English Proficiency

Northwestern will continue its innovative and proactive practices in engaging individuals from diverse cultures, backgrounds, and businesses. Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are considered limited English proficient, or LEP. Title VI of the Civil Rights Act of 1964 and Nevada SB318 prohibit recipients of Federal financial assistance from discrimination based on national origin. It is the policy of Northwestern to take reasonable steps to provide LEP people with meaningful access to all programs, services, or activities conducted by Northwestern. This policy is based on the principle that it is the responsibility of the Northwestern and not the LEP person, to take reasonable steps to ensure that communications between the Northwestern and the LEP person are not impaired as a result of the limited English proficiency of the individual. Northwestern should take reasonable steps to effectively inform the public of the availability of language-accessible programs, services, and activities.

Four Factor Analysis for Northwestern

Number or Proportion of LEP Persons

- This factor considers the number of LEP individuals who are eligible to be served by the program or who are likely to be encountered by the recipient. Data from the U.S. Census Bureau can be used to determine the number and languages spoken by LEP individuals in the relevant area.
- The number and proportion of LEP people served or encountered in the eligible service population. From a Northwestern perspective, the Spanish language was listed with the greatest number of speakers who spoke English less than very well.

Frequency of Contact with LEP Persons

- This factor assesses how often LEP individuals come into contact with the program or service. For example, a program with frequent face-to-face interactions with the public would likely have a higher frequency of contact than a program with limited public interaction.

Nature and Importance of the Program

- This factor examines the nature and importance of the program or service being provided. Programs that provide essential services, such as healthcare or emergency services, may have a greater obligation to ensure meaningful access for LEP individuals.
- Since our activities involve transportation related outcomes, the importance of Northwestern programs, activities, and services are of great significance to the LEP populations of Northwestern. From a Northwestern perspective, the Spanish language was listed with the greatest number of speakers who spoke English less than very well.

Resources Available and Costs

- This factor considers the recipient's financial and personnel resources available to provide language assistance. It involves assessing the cost of providing translation services, interpretation, and other language assistance measures.
- Northwestern utilizes I Speak Cards, and translation applications to help LEP individuals to access our programs, services, and activities. These resources are available at public counters and employee desks or job sites. The cost for this resource is minimal.
- A demographic profile of Northwestern service area identifies the locations of aggregate LEP populations based on readily available data.
- Northwestern analysis has determined that Spanish language assistance may be needed in all counties, as Spanish-speaking persons with limited English proficiency utilize Northwestern services throughout the area.
- Language Assistance Plan (LAP)
- It is the policy of Northwestern to take reasonable steps to provide LEP individuals with meaningful access to all programs, services, or activities. Northwestern shall take reasonable steps to effectively inform the public of the availability of language accessible programs, services, and activities.
- Northwestern, guided by our Four Factor Analysis, has minimal contact throughout the year with LEP people. However, Northwestern understands the nature and importance of the program, activity, and services to people's lives and will take reasonable steps to promote participation and inclusion in our programs. Northwestern's Title VI Coordinator will update, evaluate, and monitor its LAP annually.

- All staff will be provided with the LAP and will be educated on policies, procedures, and services available. This training will be included in our Title VI training held annually for managers and supervisors, for our general staff training, and as appropriate for new hires and promoted employees.
- All vital documents will be translated into Spanish and all other languages can be translated upon request by contacting the Title VI Coordinator.
- *Si desea que estos documentos sean traducidos al español, por favor póngase en contacto con el

Addendum ITD

NWS Policy Statement recognizes ITDs Policy on Title VI with The Idaho Transportation Department.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The ITD Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by ITD.

ITD delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Addendum MDT

NWS Policy Statement recognizes MDTs Policy on Title VI with The Montana Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The MDT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by MDT.

MDT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Addendum NDOT

NWS Policy Statement recognizes NDOTs Policy on Title VI with The Nevada Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The NDOT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by NDOT.

NDOT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Addendum ODOT

NWS Policy Statement recognizes ODOT's Policy on Title VI with The Oregon Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The ODOT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by ODOT.

ODOT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Addendum UDOT

NWS Policy Statement recognizes UDOTs Policy on Title VI with The Utah Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The UDOT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by UDOT.

UDOT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors

Addendum WashDOT

NWS Policy Statement recognizes WashDOTs Policy on Title VI with The Washington Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The WashDOT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by WashDOT.

WashDOT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Addendum WyDOT

NWS Policy Statement recognizes WyDOTs Policy on Title VI with The Wyoming Department of Transportation.

Northwestern affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

Northwestern is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The WyDOT Title VI Program Manager is granted the authority to administer and monitor the Title VI Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation and NWS looks forward to any guidance and trainings offered by WyDOT.

WyDOT delegates Title VI responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs. Northwestern recognizes the need for annual Title VI training for NWS personnel and welcomes any guidance and suggestions for improvement. NWS shared goals of ensuring that no person shall on the grounds of race, color, sex, age, disability, income status, or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Department, its recipients, sub-recipients, and contractors.

Attachment 1

Title VI Nondiscrimination Policy Statement

Northwestern, as a recipient of Federal and State financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, religion, disability, color, national origin, sex, or age be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation in any federally or state or non- funded program or activity administered by Northwestern.

POLICY AND SCOPE

- Northwestern' Civil Rights Policy Statement directs that the requirements of Articles 15- A of New York State Executive Law, Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, as well as the Americans with Disabilities act, and all other relevant laws and executive orders are fully integrated into all of Northwestern sub-recipient activities. State and Federal nondiscrimination laws are the cornerstones of Northwestern' strategy to ensure equal opportunity and fair and equitable programs and services to the public.
- This policy incorporates throughout all of Northwestern' operations the requirements of applicable State and Federal laws and executive orders to prohibit any discriminatory practices, procedures, and policies. All administrators, managers, supervisors, and employees are directed to comply with these laws and orders.
- All employees must assist in the prevention and elimination of any discriminatory practices and are encouraged to report allegations of discrimination to Northwestern Title VI Coordinator for review and appropriate action.
- 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 Northwestern. Any such complaint is preferably in writing and filed with Northwestern' Title VI Coordinator. Title VI Discrimination Complaint Forms may be obtained from Northwestern' Title VI Coordinator at no cost to the complainant, on our website at www.northwesternstagelines.com, or by calling (509) 838-4029.
- Any complaints involving allegations of discrimination should be submitted by mail, email, fax, or in-person to:

Northwestern Stage Lines

Attn. Title VI Coordinator

Mail: PO Box 566, Rexburg ID, 83440 Fax: (208) 996-2055

Email: Greg.Hendricks@busnws.com

Tel: (509) 838-4029

In Person: 785 S. Railroad Ave, Sugar City, ID 83448

Attachment 2

Title VI Complaint Form

Civil Rights Discrimination Complaint Form

Instructions:

You MUST file your complaint within 180 calendar days of incident. You are not required to use this form to file a complaint. In your complaint, explain in as much detail as possible, how you were discriminated against. Include all relevant names and dates. Attach any additional documentation, as necessary, to your complaints. Someone from the Office of Civil Rights will be in contact with you **within seven (7) business days** of receiving the complaint.

Submit complaint to:

4611 S Ben Franklin Ln, Spokane, WA 99224

Email: info@busnws.com

Voice: 800-366-6975

Complainant Information

Name _____

Address _____

Phone _____

Email _____

Preferred method of contact:

☐ Phone

☐ Email

I am filing a complaint on behalf of:

☐ Self

☐ Someone else (Specify who)

Complaint (Mark all that apply)

☐ Harassment

☐ Hostile Work Environment

☐ Retaliation

Basis of Complaint: (Mark all that apply)

Federal & State Protected Classes

☐ Age

☐ Color

☐ Disability

☐ Gender Identity

☐ Income Level

☐ Limited English Proficiency

☐ National Origin

☐ Race

☐ Sex

☐ Sexual Orientation

Complaint Details

Name of individual(s) you are filing the complaint against: _____

Name & Contact Info of Witness(es): _____

Date of last alleged act of discrimination: _____

Description of why you are filing your complaint: (attach additional pages if needed)

Signature _____

Date _____