

**West Plains Transit System
City of West Plains, MO**

Title VI Program

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A. Title VI Assurances

West Plains Transit System agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

West Plains Transit System assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. West Plains Transit System further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

West Plains Transit System meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including the West Plains Transit System and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Additional information regarding West Plains Transit’s nondiscrimination obligations may be obtained by calling the Transit manager at (417) 256-1241 or City Hall at (417) 256-7176. Inquiries may be mailed to City Hall, PO Box 710, West Plains, MO 65775 or by visiting City Hall at 1910 Holiday Lane, West Plains, MO.

B. Agency Information

West Plains Transit System

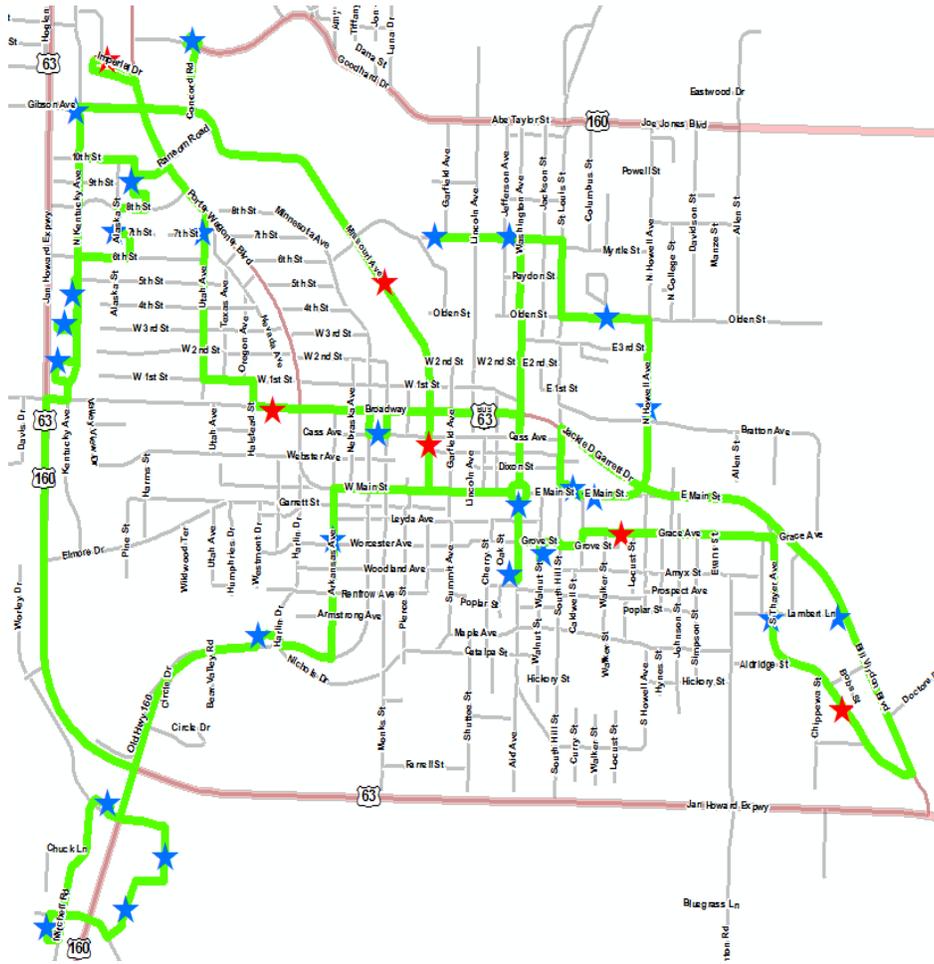
West Plains Transit is a public transportation service of the City of West Plains, Missouri. West Plains Transit began operations in 1982. The System is under the management of the City Administrator who reports to the West Plains City Council. The Council is composed of four Council members and the Mayor who are elected from the general population for four year terms.

West Plains' legal boundaries encompass approximately 13.2 square miles. One hundred seventy-six miles of streets, state highways and private roads are included in the service area.

West Plains Transit service is available to everyone within the legal boundaries of the City of West Plains. In addition to operating one fixed route with deviations, the System utilizes two vehicles for demand responsive curb to curb service which provides transportation for riders who are unable to access a fixed route bus stop.

According to 2010 U.S. Census data, West Plains' population was 11,986. Eighteen and seven tenths percent of the population was 65 years of age or over. From 2008-2012 persons below the poverty level were 28.2 percent of the population. Median household income during that period was \$29,965.

West Plains Transit Fixed Route With Deviations



C. Notice to the Public

Notifying the Public of Rights under Title VI

West Plains Transit System posts Title VI notices on our website, in public areas of our System such as bus stop shelters, and on our buses and mini-van.

West Plains Transit System operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

If you believe you have been discriminated against on the basis of race, color, or national origin by West Plains Transit System, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

How to file a Title VI complaint with West Plains Transit System:

Complaint Forms may be obtained from West Plains Transit System drivers, at www.westplains.net, or at City Hall, 1910 Holiday Lane, West Plains, Missouri.

In addition to the complaint process at West Plains Transit System, Complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.

The form must be signed and dated, and include your contact information. Completed forms should be sent to City Administrator, City of West Plains, 1910 Holiday Lane, West Plains, MO 65775.

If information is needed in another language, contact (417) 256-1241 or (417)256-7176.

D. Procedure for Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of West Plains Transit System's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by West Plains Transit System may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency such as bus stop shelters, and on our buses and mini-van.

You may download the West Plains Transit System Title VI Complaint Form at www.westplains.net, or request a copy by writing to City of West Plains, Transit System, 1910 Holiday Lane, West Plains, MO 65775. Information on how to file a Title VI complaint may also be obtained by calling City Hall at (417)256-7176 or the Transit System at (417)256-1241.

You may file a signed, dated complaint no more that 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to City Administrator, West Plains Transit System, 1910 Holiday Lane, West Plains, MO 65775.

COMPLAINT ACCEPTANCE: The West Plains Transit Manager will process complaints that are complete. In the event the alleged incident includes a complaint against the Transit Manager, the City Administrator will process the complaint. Once a completed Title VI Complaint Form is received, West Plains Transit Manager will review it to determine if West Plains Transit System has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by West Plains Transit System.

INVESTIGATIONS: West Plains Transit System will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, West Plains Transit System may contact the complainant. Unless a longer period is specified by West Plains Transit System, the complainant will have ten (10) days from the date of the letter to send requested information to the West Plains Transit System investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with West Plains Transit System's determination, the complainant may request reconsideration by submitting the request in writing to the City Administrator. In the event that the complaint involved the Transit Manager and was processed by the City Administrator, the request for reconsideration should be sent to the City Council. Requests for reconsideration should be submitted within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. West Plains Transit System will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, West Plains Transit System will issue a determination letter to the complainant upon completion of the reconsideration review.

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

If information is needed in another language, contact West Plains Transit System at 1910 Holiday Lane, West Plains, MO 65775, or at (417)256-1241 or (417)256-7176.

**E. Monitoring Title VI Complaints, Investigations, Lawsuits
and Documenting Evidence of Agency Staff Title VI Training**

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in West Plains Transit System’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log. The City Administrator will serve as the Title VI Coordinator.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of West Plains Transit System Staff Title VI Training

West Plains Transit System’s staff is given Title VI training, and West Plains Transit can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the West Plains Transit System’s public areas and on any program materials distributed, as necessary?

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for West Plains Transit's outreach efforts.

Objectives

- To understand the service area demographics.
- To periodically monitor any increases in minority and LEP populations. According to the 2010 Census West Plains' population includes .8% Black or African American, .6% American Indian and Alaska Native, .9% Asian, .1% Native Hawaiian and Other Pacific Islander, 1.8% Two or More Races, and 2.2% Hispanic or Latino. The Transit System has not reported any incidents in which the rider could not effectively interact with the Transit driver.
- To convey information about West Plains Transit services to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- West Plains City Council – the governing board of West Plains Transit System. The role of the City Council is to establish policy and legislative direction for the agency. The Council defines the Transit System's mission, establishes goals, and approves the budget to accomplish the goals.
- West Plains Transit System riders and clients
- All persons within the City of West Plains including minority and low income populations, and limited English proficient persons
- Local social service agencies, government agencies, schools, universities, medical facilities, civic organizations, businesses, libraries and churches.

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage all potential beneficiaries of West Plains Transit System.

Elements of the Public Engagement Plan include:

1. Public Engagement Process/Outreach Efforts:

- a. Written or oral communication with social service agencies, government agencies, schools, universities, medical facilities, civic organizations, businesses, libraries and churches regarding evidence of increases in minority or LEP populations.
- b. Written or oral communication with social service agencies, government agencies, schools, universities, medical facilities, civic organizations, businesses, libraries and churches regarding the services available through West Plains Transit System.
- c. Surveys to ascertain the need for an additional fixed route with deviations in an area of the City not presently served by such route.

2. Public Comment

Investigate a means to encourage and accept regular public comments. Consider modes for receiving comments as well as methods to compile public comments in order to obtain meaningful data.

3. Response to Public Input

Public comments are considered prior to decision making.

Title VI Outreach Best Practices

West Plains Transit System ensures all outreach strategies, communications and public involvement efforts comply with Title VI. West Plains Transit System’s Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, West Plains Transit System provides the following:

- a. Title VI non-discrimination notice on agency’s website.
- b. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2013 – 2016 Title VI Program Public Engagement Process

West Plains Transit System will conduct a Public Engagement Process for the 2013-2016 Title VI Program. This process includes written and oral communication to seek input, an increase in Transit System Brochure distribution and other postings that highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

West Plains Transit System will provide briefings to the West Plains City Council.

Summary of 2010-2012 Public Outreach Efforts

Title VI Notices and Complaint Procedures were posted in all vehicles.
A Limited English Proficiency policy was developed and volunteer interpreters secured following consultation with West Plains R-VII School District regarding LEP students attending school in the District.
The Transit brochure includes ADA accessibility information and information regarding filing both ADA and Title VI complaints.
Meetings were held in two West Plains Housing Authority apartment complexes to publicize Transit services.
Title VI information was included in map/route signage in 6 new bus stop shelters.

G. Language Assistance Plan

West Plains Transit System's Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address West Plains Transit System's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: Within the legal boundaries of the City of West Plains, MO 65775

West Plains Transit System has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by West Plains Transit System. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, West Plains Transit System undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the West Plains Transit System service area are proficient in the English language. Based on 2008-2012 American Community Survey data, .25% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

LEP Population in West Plains Transit System's Service Area (ACS 2008-2012 estimates)					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [1]	Service Area Sector [1]	Service Area Sector [1]	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over				10997	100.00
Speak English "less than very well"				27	.25
Spanish					
Speak English "less than very well"				16	.15
Other Indo-European					
Speak English "less than very well"				1	.01
Asian and Pacific Island					
Speak English "less than very well"				10	.09
All Other					
Speak English "less than very well"					

2. Frequency of Contact by LEP Persons with West Plains Transit System's Services:

The West Plains Transit System's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, West Plains Transit System has, on average, no requests for an interpreter.

LEP Staff Survey Form
West Plains Transit System is studying the language assistance needs of its riders so that we can better communicate with them if needed.
<ol style="list-style-type: none"> 1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them? DAILY WEEKLY MONTHLY LESS THAN MONTHLY 2. What languages do these passengers speak? 3. What languages (other than English) do you understand or speak? 4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by West Plains Transit System to LEP persons:

Outreach activities, summarized in West Plains Transit System’s Title VI Public Engagement Plan, include events such as public meetings and communication with schools, churches, libraries and other stakeholders to gain an understanding of the needs of the LEP population, and the manner needs are addressed.

Outside Organization LEP Survey
<p>Organization: _____</p> <ol style="list-style-type: none"> 1. What language assistance needs are encountered? 2. What languages are spoken by persons with language assistance needs? 3. What language assistance efforts are you undertaking to assist persons with language assistance needs? 4. When necessary, can we use these services?

5. The resources available to West Plains Transit System and overall cost to provide LEP Assistance

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Online interpreter service with advance notice.
2. Community interpreter volunteers.

As applicable: Based on our demographic analysis (Factor 1) West Plains Transit System has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

West Plains Transit System will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to West Plains Transit System staff:

1. Information on West Plains Transit System's Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of West Plains Transit System's Title VI Plan requirement.

West Plains Transit System will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the West Plains Transit System service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether West Plains Transit System's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether West Plains Transit System has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning West Plains Transit System's failure to meet the needs of LEP individual.

H. Planning Boards, Advisory Councils & Committees

Planning Boards, Advisory Councils and Committees are not applicable to West Plains Transit System's Title VI Program due to the small number of minority individuals within the City of West Plains.

I. Subrecipient Assistance

West Plains Transit System does not have any subrecipients.

J. Subrecipient Monitoring

West Plains Transit System does not have any subrecipients.

K. Equity Analysis of Facilities

West Plains Transit System has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Construction of a Transit System bus barn should commence during 2014. No persons were displaced from their residences or businesses at the location of the planned facility.

Attachment 1

WEST PLAINS TRANSIT TITLE VI COMPLAINT FORM

“No person in the United States shall, on the basis 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.”

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

City Administrator
 West Plains Transit
 PO Box 710
 West Plains, MO 65775
 Email: Tom.Stehn@westplains.net or fax: (417)256-4953

PLEASE PRINT

1. Complainant’s Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home () or Cell ()		Work
() -		() -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
2. Accessible Format of Form Needed? () YES specify: _____ () NO		
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zipcode:
d. Telephone (include area code): Home () or Cell ()		Work
() -		() -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI) () Other (please specify)		

continued

TITLE VI COMPLAINT FORM – PAGE 2

8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone: () -	
Address:		
City:	State:	Zip Code:

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

Signature and date is required:

Signature

Date

If you completed Questions 4, 5 and 6, your signature and date is required:

Signature

Date

Attachment 2

Title VI Self-Survey Form

Date filed with MoDOT Transit Section:

DATE

Survey Date:

Period Covered:

Name of Program/Grant:

- A. Summary of Complaints:
- B. Number of complaints for the period:
- C. Number of complaints voluntarily resolved:
- D. Number complaints currently unresolved:
- E. Attach a summary of any type of complaint and provide:
 - Name of complainant
 - Race
 - Allegation
 - Findings
 - Corrective Action
 - Identify any policy/procedure changes made as a result of the complaint.
 - Provide the date history (date complaint received through resolution)

continued
Title VI Self-Survey Form – Page 2

Distribution of Title VI Information

1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?

YES _____ NO _____

2. Do new employees receive this information via employee orientation?

YES _____ NO _____

3. Is Title VI information provided to all employees and program applicants?

YES _____ NO _____

4. Is Title VI information prominently displayed in the organization and on relevant program materials?

YES _____ NO _____

5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants.

6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants.

7. Identify any problems encountered with Title VI compliance, and discuss possible remedies.

Signature: _____

Title: _____

Date: _____