



Mid-MO Regional Planning Commission

BOONE | CALLAWAY | COLE | COOPER | HOWARD | MONITEAU

Title VI Program

Revised December 2022

Date Approved by David Bock, Executive Director of the
Mid-Missouri Regional Planning Commission:

Signed January 11, 2023



Title VI Plan Table of Contents

A. Title VI Assurances	2
B. Agency Information.....	3
C. Notice to the Public.....	8
D. Procedure for Filing a Title VI Complaint	9
E. Monitoring Title VI Complaints, Investigations, Lawsuits <i>and</i> Documenting Evidence of Agency Staff Title VI Training	11
F. Public Engagement Plan	12
G. Language Assistance Plan	16
H. Advisory Bodies	20
I. Subrecipient Assistance	21
J. Subrecipient Monitoring.....	22
K. Equity Analysis of Facilities	23
L. System-Wide Service Standards and Policies*	24
M. Requirement to Collect and Report Demographic Data*	25
N. Requirement to Monitor Transit Service*	26
O. Service and Fare Equity Analysis*	27
Attachment 1: Mid-MO RPC Title VI Complaint form.....	28
Attachment 2: Language Identification Cards	30

A. Title VI Assurances

Mid-Missouri Regional Planning Commission (Mid-MO RPC) 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.

The Mid-MO RPC 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. Mid-MO RPC 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.

Mid-MO RPC meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Mid-MO RPC 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).

Signed: _____

Title: David Bock, Executive Director

Date: January 11, 2023

B. Agency Information

1. Mission of the Mid-Missouri Regional Planning Commission

The purpose of the Mid-MO RPC is to increase communication, cooperation, and coordination between its member governments in planning and developing policies and activities for the orderly development of the Mid-Missouri Region.

Our goals:

- serve as an advocate for the region
- serve as a resource for member governments
- provide a forum for local officials to discuss regional issues and concerns
- provide professional staff to assist member governments
- promote community and economic development

2. History

Mid-MO RPC was re-organized in 1999 and currently includes the counties of Boone, Callaway, Cole, Cooper, Howard and Moniteau. Mid-MO RPC was originally formed in 1965 when the Missouri Legislature enacted the State and Regional Planning and Community Development Act. This Act [Chapter 251 of the Revised Statutes of Missouri (1969)] created the Missouri Department of Community Affairs. Among its many functions, the Department of Community Affairs assists local governments in creating solutions to their common problems. The Legislature also instructed the Department to conduct continuing research and analysis of problems faced by political subdivisions of the State of Missouri. The Department emphasizes the issues that metropolitan, suburban, and other areas face from changing economic and population forces.

Authorization of Regional Planning Commissions

The State and Regional Planning and Community Development Act also authorized the Governor of Missouri to create regional planning commissions if so petitioned by local government units. If the Governor finds there is a need for a regional planning commission, and if the governing bodies of local units within the proposed region include over fifty percent of the population within the proposed region, the Governor may then create the regional planning commission.

The State of Missouri's 114 counties have been divided into 19 regional planning commissions. These 19 regional planning commissions have been joined together to form the Missouri Association of Councils of Government (MACOG) in order to explore common interests and improve their ability to balance their many roles.

Section 251:300 of the Revised Statutes of the State of Missouri (1969), states that regional

planning commissions such as the Mid-MO RPC “...may conduct all types of research studies, collect and analyze data, prepare maps, charts, and tables and conduct all necessary studies for the accomplishment of its other duties...”

Organization and Structure

Mid-MO RPC is a voluntary organization comprised of local units of governments [both counties and cities] within the six-county region. Members are assessed a membership fee based upon the population of the community. In addition to the money generated by local membership fees, the Mid-MO RPC (along with other rural regional planning commissions) receives funds from the State of Missouri to offset the costs of assisting its members. The balance of the Mid-MO RPC operating budget comes from fees the Commission collects for administering various State and Federal programs on behalf of the counties and cities in the region.

3. Regional Profile (regional population; growth projection)

The Mid-MO RPC region encompasses 6 counties and 44 incorporated communities. The population of the Mid-MO RPC region is 347,899 according to the 2020 U.S. Decennial Census. The region spans both rural and urban areas including the City of Columbia, home to the University of Missouri, and the Missouri State Capitol in Jefferson City. Interstate 70 cuts through the center of the region as does the Missouri River. Running through the heart of the region, the Missouri River touches all six counties and feeds that highly agricultural river valley and surrounding landscape. The Mid-MO RPC region is home to several universities, colleges, and technical schools.

Between the 2000 and 2010 US Census the region grew by approximately 1.2% per year and between 2010 and 2020 the region’s population growth rate slowed to just .64% per year. Boone County accounts for most of the growth across the region

According to the Missouri State Office of Administration, the state’s 2000-2030 population is expected to grow by around 20%. Within the Mid-MO RPC region, the following growth rates was projected:

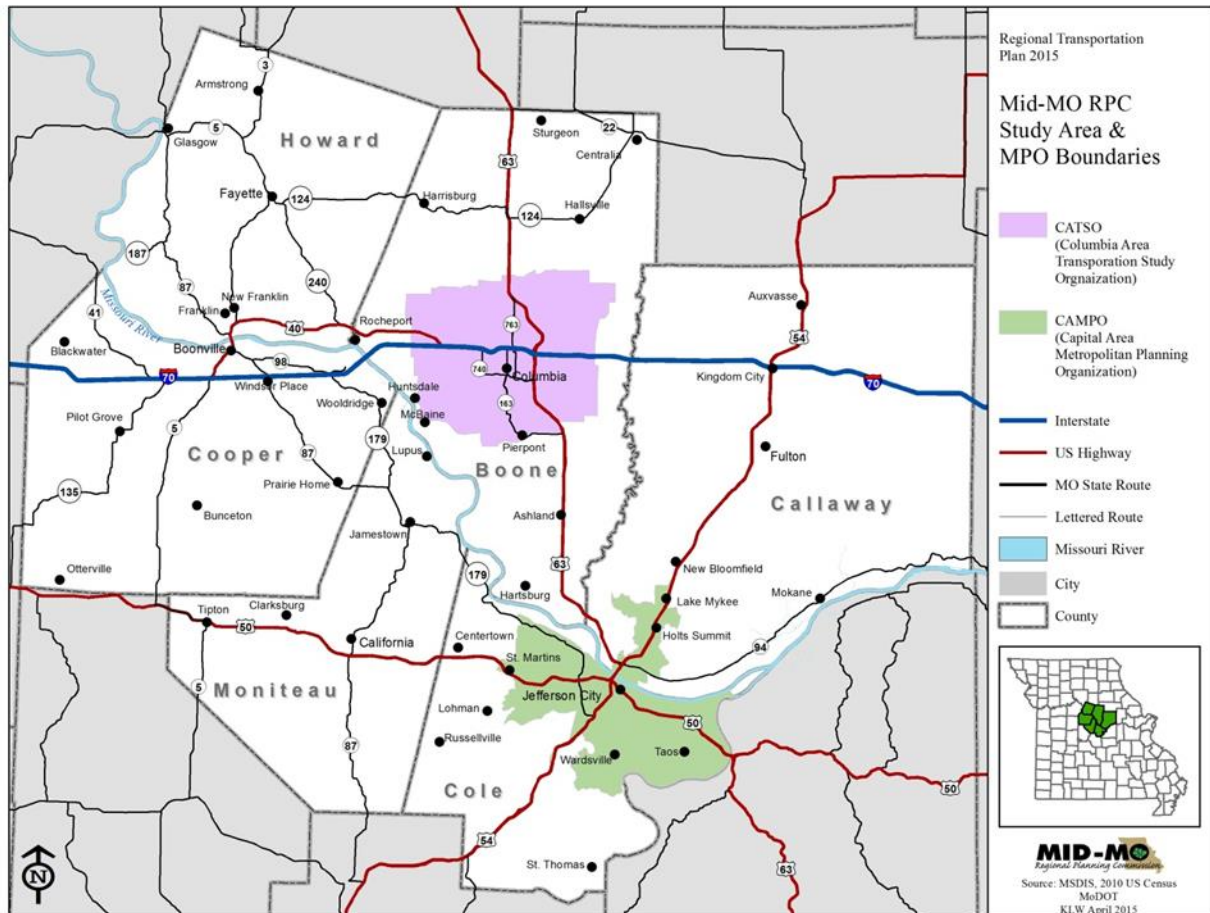
- Boone – 50%
- Callaway – 35%
- Cole – 17%
- Cooper – 25%
- Howard – 1%
- Moniteau – 12%

4. Population served (in relation to regional population)

Mid-Mo RPC membership is available to the entirety of its 6 county/44 community region. The Mid-MO RPC region has a total population of 347,899 according to the 2020 Decennial Census. All six counties are active members and their populations are served by Mid-MO RPC.

5. Service area (include map, with any routes utilized)

The map below depicts the Mid-Missouri Regional Planning Commission Membership area and member metropolitan planning organizations (MPOs)



6. Governing body make-up (include terms of office)

The bylaws of the Mid-Missouri Regional Planning Commission allow each county in the region to have up to three seats on the Board of Directors. One representative from each county is a County Commissioner or designee from the County Commission. The other two seats are available for members representing two cities within the county. Cities within each county may petition their County Commission to have a representative on the Board.

Members of the Board of Directors serve two-year terms. The terms are staggered to aid in continuity; approximately half are up for renewal or replacement each year. The Mid-MO RPC Board of Directors consists of 20 members, 2 of which are at large.

BOARD of DIRECTORS FY2023

Terms run two years and follow the fiscal year July 1-June 30.

<u>Boone County</u>	<u>Representing</u>	<u>Term</u>
Kip Kendrick	County Commission	July 1, 2019-June 30, 2023
Kyle Michel	City of Ashland	July 1, 2018-June 30, 2024
Chris Cox	City of Centralia	July 1, 2019-June 30, 2023
<u>Callaway County</u>		
Gary Jungermann	County Commission	July 1, 2019-June 30, 2023
Dennis Houchins	City of Fulton	July 1, 2018-June 30, 2024
Brandon Ruediger	City of Holts Summit	July 1, 2019-June 30, 2023
<u>Cole County</u>		
Harry Otto	County Commission	July 1, 2018-June 30, 2024
Doug Reese	City of St. Martins	July 1, 2019-June 30, 2023
Sonny Sanders	City of Jefferson	July 1, 2018-June 30, 2024
<u>Cooper County</u>		
George Monk	County Commission	July 1, 2018-June 30, 2024
Justin Hein	City of Bunceton	July 1, 2019-June 30, 2023
Ned Beech	City of Boonville	July 1, 2018-June 30, 2024
<u>Howard County</u>		
Jeremiah Johnmeyer	County Commission	July 1, 2019-June 30, 2023
VACANT	City of New Franklin	July 1, 2019-June 30, 2023
Grafton Cook	City of Fayette	July 1, 2018-June 30, 2024
<u>Moniteau County</u>		
Joe Lutz	County Commission	July 1, 2018-June 30, 2024
VACANT	City of California	July 1, 2019-June 30, 2023
Mike Kelley	City of Tipton	July 1, 2018-June 30, 2024
<u>AT LARGE MEMBERS</u>		
Les Hudson	Community Programs	July 1, 2018-June 30, 2024
Marsha Broadus	Minority	July 1, 2018-June 30, 2024

Officers – elected for two year term beginning each Fiscal Year (July-June)

Chairman	Ned Beach
Vice Chairman	Harry Otto
Secretary	Gary Jungerman
Treasurer/Budget Chairman	Brandon Ruediger
Past Chairman	Mike Kelley
Personnel Chairman	Les Hudson

Advisory Committees Chairs – elected for one-term

TAC Chairman	Eric Landwehr
EDAC Chairman	GiGi Quinlan McAreavy

C. Notice to the Public

Notifying the Public of Rights under Title VI

Mid-MO RPC posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

Mid-MO RPC 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.

For more information on the Mid-MO RPC's Title VI program, and the procedures to file a complaint, contact David Bock, Executive Director, by email at DavidBock@midmorpc.org; or by phone at 573-657-9779; or visit our administrative office at 206 E Broadway, Ashland, Missouri 65010. For more information visit our website at: <https://www.midmorpc.org/plans-publications>.

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

To obtain additional information about your rights under Title VI, you can also contact Lincoln Brown by email at lincolnbrown@midmorpc.org.

How to file a Title VI/ADA complaint with Mid-MO RPC:

1. A complain form and procedures for completing it may be obtained from our website at <https://www.midmorpc.org/plans-publications> or by contacting David Bock or Lincoln Brown via the methods listed above.
2. In addition to the complaint process at Mid-MO RPC, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590.
3. 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.
4. The form must be signed and dated and include your contact information.

If information is needed in another language, contact Lincoln Brown at 573-657-9779

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Mid-MO RPC'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 Mid-MO RPC 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.

You may download the Mid-MO RPC Title VI Complaint Form at <https://www.midmorpc.org/plans-publications>, or request a copy by writing to Mid-Missouri Regional Planning Commission, PO Box 140, Ashland, MO 65010. Information on how to file a Title VI complaint may also be obtained by calling David Bock at 573-657-9779.

You may file a signed, dated complaint no more than 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 Mid-MO RPC, Attn: David Bock – Title VI Complaint, PO Box 140, Ashland, MO 65010.

COMPLAINT ACCEPTANCE: Mid-MO RPC will process complaints that are complete. Once a completed Title VI Complaint Form is received, Mid-MO RPC will review it to determine if Mid-MO RPC has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Mid-MO RPC.

INVESTIGATIONS: Mid-MO RPC will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Mid-MO RPC may contact the complainant. Unless a longer period is specified by Mid-MO RPC, the complainant will have ten (10) days from the date of the letter to send requested information to the Mid-MO RPC 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 Mid-MO RPC's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. Mid-MO RPC 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, Mid-MO RPC 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, East Building, 5th Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact Lincoln Brown at Mid-MO RPC, P.O. Box 140, Ashland, MO 65010, or at 573-657-9779.

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 Mid-MO RPC'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.

During the reporting period, Mid-MO RPC had 0 Title VI Complaints.

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 Agency Staff Title VI Training

Mid-MO RPC's staff are given Title VI training, and agency 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 agency 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 major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low-income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats 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:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency and are encouraged to be active in the agency’s public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low-income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Mid-MO RPC ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Mid-MO RPC'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, Mid-MO RPC provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2022 – 2024 Title VI Program Public Engagement Process

Mid-MO RPC will conduct a Public Engagement Process for the 2022-2024 Title VI Program. This process includes Community Meetings to seek input, provide education, and 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.

Mid-MO RPC will provide briefings to the Board of Directors and Advisory Bodies.

Mid-MO RPC will conduct a 30-day public comment period to provide opportunities for feedback on the 2022-2024 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

Summary of 2019-2022 Public Outreach Efforts

Mid-MO RPC's direct stakeholders and clients are almost entirely local elected city and county officials, and state government agency representatives. Most private contacts at our organization revolve around engineering firms and other professional service providers or businesses. While our services benefit the public at large, most interactions with the public are only through their participation in the meetings and hearings open to the public as they relate

to specific programming. In that venue we host or participate in a wide variety of meetings and hearings that are soliciting public input on a projects and service provision.

- All MID-MO RPC member, board, and advisory committee meetings are free and open to the public. They are held quarterly, advertised, and posted on our website as well as on the front door to our office.
- MID-MO RPC staff frequently attend city council and board of aldermen meetings for many of our member communities, and most grant projects, which we administer, require public outreach through public meetings and public comment periods.
- Through the administration of programs like the Community Development Block Grant, Mid-MO RPC staff ensure that prospective and ongoing projects do not discriminate either in their provision of services to their community or in their development during construction and procurement. Additionally, Mid-MO RPC actively solicits participation from M/W/DBE and Section 3 certified firms for all bidding opportunities related to projects we administer.
- Transportation Planning meetings with City and County officials and public works staff during the needs assessment period are open to the public.
- Reaching out to low-income and vulnerable groups is often a keep component of our assistance to Cities during their comprehensive planning processes.

G. Language Assistance Plan

Mid-MO RPC Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address Mid-MO RPC'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: The Mid-MO RPC region consists of Boone, Callaway, Cole, Cooper, Howard, and Moniteau Counties.

Mid-MO RPC 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 Mid-MO RPC. 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, Mid-MO RPC 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 Mid-MO RPC service area are proficient in the English language. Based on 2020 5-Year American Community Survey data, 2.24% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

LEP Population in the Mid-Missouri RPC Service Area

LEP Population in the Mid-Missouri RPC Service Area									
Population 5 years and over by language spoken at home and ability to speak English	Boone County	Callaway County	Cole County	Cooper County	Howard County	Monticau County	Mid-MO RPC Total Area	Percentage of Population 5 Years and Older	
Population 5 Years and Over	169,314	42,575	72,087	16,509	9,443	14,828	324,756	100.00%	
Speak English "less than very well"	5,174	284	1,086	97	57	587	7,285	2.24%	
Spanish	3,506	281	1,283	82	95	532	5,779	1.78%	
Speak English "less than very well"	1,097	135	308	3	8	218	1,769	0.54%	
French, Haitian, or Cajun	472	54	166	14	1	9	716	0.22%	
Speak English "less than very well"	27	16	62	0	1	0	106	0.03%	
German	425	34	172	197	9	761	1,598	0.49%	
Speak English "less than very well"	101	0	52	85	0	321	559	0.17%	
Russian	782	14	56	9	2	0	863	0.27%	
Speak English "less than very well"	220	0	26	0	0	0	246	0.08%	
Indo-European	1,671	47	430	4	0	0	2,152	0.66%	
Speak English "less than very well"	393	31	250	0	0	0	674	0.21%	
Korean	711	8	19	0	0	21	759	0.23%	
Speak English "less than very well"	375	8	19	0	0	21	423	0.13%	
Chinese	2,468	57	347	39	26	0	2,937	0.90%	
Speak English "less than very well"	1,522	0	321	9	26	0	1,878	0.58%	
Vietnamese	346	98	0	5	3	21	473	0.15%	
Speak English "less than very well"	224	87	0	0	0	21	332	0.10%	
Tagalog	134	79	0	32	5	0	250	0.08%	
Speak English "less than very well"	12	0	0	0	0	0	12	0.00%	
Asian & Pacific Island	1,468	2	113	2	9	3	1,597	0.49%	
Speak English "less than very well"	589	0	8	0	5	0	602	0.19%	
Arabic	545	2	36	6	0	0	589	0.18%	
Speak English "less than very well"	282	0	36	0	0	0	318	0.10%	
All Other	969	32	101	39	21	8	1,170	0.36%	
Speak English "less than very well"	332	7	4	0	17	6	366	0.11%	

2. Frequency of Contact by LEP Persons with Mid-MO RPC's Services:

The Mid-MO RPC staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, Mid-MO RPC has on average zero requests per month for an interpreter. Mid-MO RPC averages zero phone calls per month.

LEP Staff Survey Form

Mid-MO RPC is studying the language assistance needs of its riders so that we can better communicate with them if needed.

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	0
Weekly	0
Monthly	0
Less frequently than monthly	0

3. The importance of programs, activities or services provided by Mid-MO RPC to LEP persons:

Outreach activities, summarized in Mid-MO RPC's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

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?

4. The resources available to Mid-MO RPC and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Preliminarily, based on our demographic analysis (Factor 1) Mid-MO RPC has determined that 2 language groups within its service area (Spanish and Chinese) meets Safe Harbor criteria for having written translations of “vital documents” by language group. However, based on the other 3 Factors of analysis and the nature of our organization and client base we have determined that written translation is not required. As discussed in the public engagement section of this plan, Mid-MO RPC’s primary and even secondary interactions are almost entirely with local city and county elected officials or staff, or with representatives of state agencies. Our provision of services, across multiple programs, are for organizational and government clients.

Regardless of this finding, Mid-MO RPC will always provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to Mid-MO RPC staff:

1. Information on Mid-MO RPC Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of Mid-MO RPC’s Title VI Plan requirement.

Mid-MO RPC 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 Mid-MO RPC 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 Mid-MO RPC's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Mid-MO RPC has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning Mid-MO RPC's failure to meet the needs of LEP individual.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American	Vacant Seat	Total
Mid-MO RPC Board	16 (80%)		2 (10%)		2 (10%)	100%
Transportation Advisory Committee (TAC)	*100%					100%
Economic Development Advisory Committee (EDAC)	*100%					100%

Description of efforts made to encourage minority participation on committees:

As stated in Section A:

Mid-MO RPC 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. Mid-MO RPC 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.

* Mid-MO RPC utilizes its at large board positions to ensure minority participation in its governance structure but has less authority over advisory committee membership. Mid-MO RPC asks that member communities and counties appoint a designated representative to both TAC and EDAC committees. Not all members do so which results in variation of committee members and inconsistency of make-up of the individual groups. The numbers provided in the chart above are only reflective of current attendance within the last two years.

I. Subrecipient Assistance

Subrecipient Assistance

Mid-MO RPC does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

Mid-MO RPC does not have any subrecipients.

K. Equity Analysis of Facilities

Mid-MO RPC has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

L. System-Wide Service Standards and Policies*

**NOT APPLICABLE:
Mid-MO RPC is not a fixed route provider.**

M. Requirement to Collect and Report Demographic Data*

**NOT APPLICABLE:
Mid-MO RPC is not a fixed route provider.**

N. Requirement to Monitor Transit Service*

**NOT APPLICABLE:
Mid-MO RPC is not a fixed route provider.**

O. Service and Fare Equity Analysis*

**NOT APPLICABLE:
Mid-MO RPC is not a fixed route provider.**

Attachment 1: Mid-MO RPC Title VI Complaint form

Mid-MO RPC TITLE VI/ADA 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: Mid-MO RPC
Attn: David Bock – Title VI Complaint
P.O. Box 140
Ashland, MO 65010
DavidBock@midmorpc.org

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:	Zip code:
d. Telephone (include area code): Home () - 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)		
() Disability (class protected by ADA)		
() 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: Language Identification Cards

**2004
Census
Test**

United States
**Census
2010**

LANGUAGE IDENTIFICATION FLASHCARD

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

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

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