

Civil Rights Requirements- A. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. ("Title VI") Title VI prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance.

2018 Title VI

Harry S Truman
Coordinating Council



Contents

A. Title VI Assurances	2
Mission of Harry S Truman Coordinating Council	3
History.....	3
Regional Profile (regional population; growth projection).....	3
Population served (in relation to regional population)	6
Governing body make-up.	8
Procedure for Filing a Title VI Complaint.....	11
Monitoring Title VI Complaints, Investigations, Lawsuits.....	13
and Documenting Evidence of HSTCC Staff Title VI Training.....	13
Documenting Evidence of HSTCC Staff Title VI Training.....	13
Public Engagement Plan.....	14
Identification of Stakeholders	14
Elements of the Public Engagement Plan	15
Title VI Outreach Best Practices.....	16
2013 – 2016 Title VI Program Public Engagement Process	17
Language Assistance Plan.....	18
Four Factor Analysis.....	19
Staff LEP Training	22
Monitoring and Updating the LEP Plan.....	22
Sub recipient Assistance	23
Sub recipient Monitoring.....	24
Equity Analysis of Facilities.....	25
System-Wide Service Standards and Policies*	26
How to file a Complaint	27
Appeal	30
The Harry S Truman Coordinating Council VI Self-Survey Form.....	31

Title VI Assurances

The Harry S Truman Coordinating Council 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 Harry S Truman Coordinating Council 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. The Harry S Truman Coordinating Council 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.

The Harry S Truman Coordinating Council meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Harry S Truman Coordinating Council 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).

Mission of Harry S Truman Coordinating Council

Mission Statement

The mission of the Harry S Truman Coordinating Council (HSTCC) is to promote human resources & educational opportunities and to provide community, economic and environmental planning and development in order to enhance the quality of life for the residents of the four-county region.

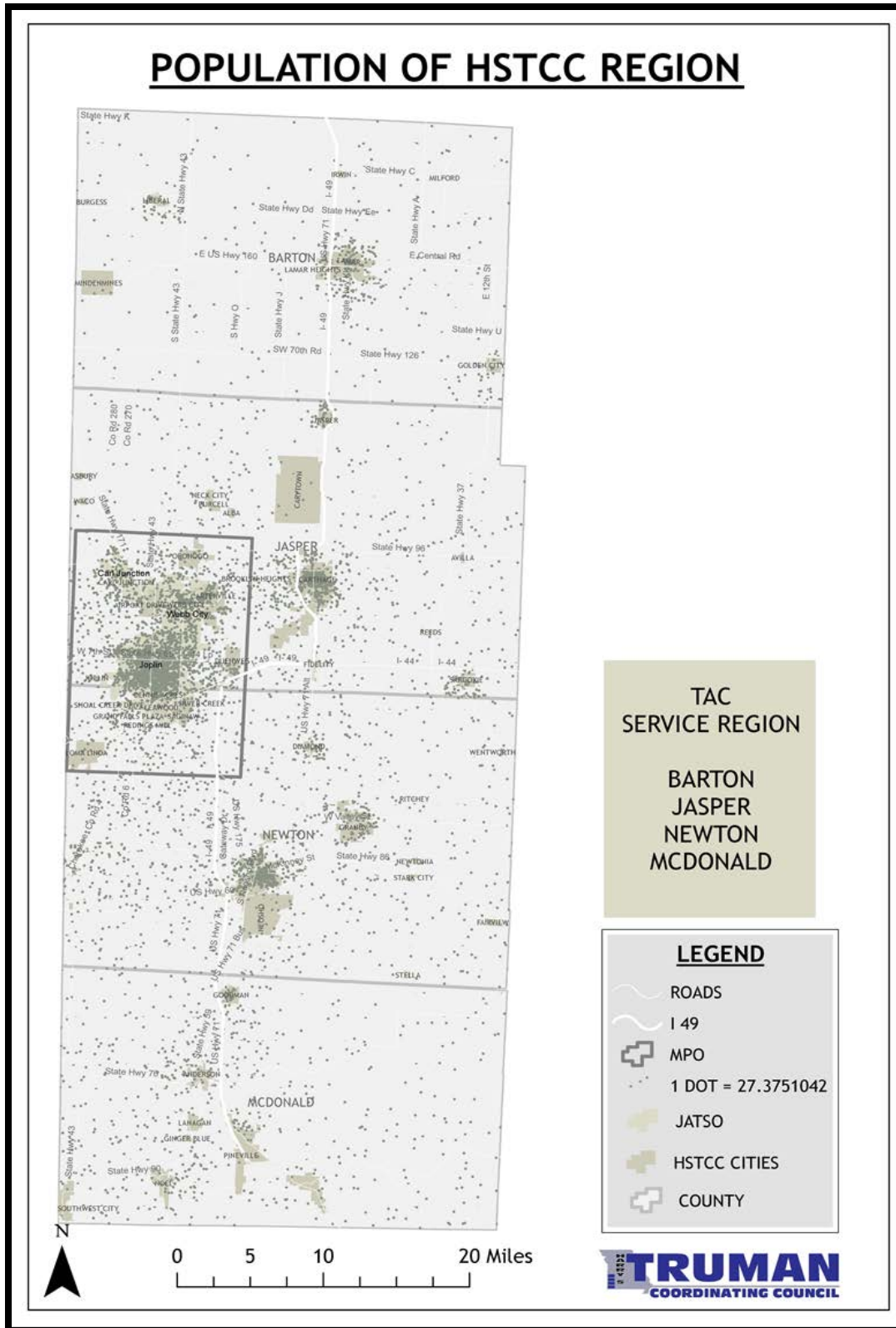
History

The Harry S Truman Coordinating Council started its services in 1991. The Harry S Truman Coordinating Council (HSTCC) is a Regional Planning Commission (RPC) created by Missouri State Statute 251.250. HSTCC is one of 19 active Regional Planning Commissions (RPCs) in the State. RPCs are also referred to as Councils of Government (COGs). Members of the HSTCC are the cities and counties in good standing within Barton, Jasper, Newton & McDonald counties, as well as associate members who are stakeholders in the region.

Missouri's regional planning commissions work together through the Missouri Association of Councils of Government (MACOG) a state association, to share educational opportunities and best practices, as well as meet with state agencies in Jefferson City on a monthly basis.

Regional Profile (regional population; growth projection)

POPULATION The population of the HSTCC region grew by 10.2 percent between 2000 and 2010, increasing from 191,544 to 211,003. Growth is expected to continue over the next 20 years by roughly 23 percent, almost reaching 261,000 by 2030. Population growth rates vary widely by county. Jasper County is the region's largest county in terms of population, followed by Newton, McDonald then Barton counties. Population increased in each county every single census since 1970, with the lone exception of Barton County falling in population only during the most recent census.



Map 1 represents current population density throughout the HSTCC region, American Fact Finder, 2017.

Geographic Area	Census Population				Population Projections	
	2000	2010	Change	Percent Change	2020	2030
HSTCC Region	191,544	211,003	19,459	10%	237,405	260,961
Barton Co.	12,541	12,402	(139)	-1%	13,173	13,730
Jasper Co.	104,686	117,404	12,718	12%	136,389	152,490
Newton Co.	52,636	58,114	5,478	10%	62,218	66,663
McDonald Co.	21,681	23,083	1,402	6%	25,625	28,078
Missouri	5,595,211	5,988,923	393,712	7%	6,389,850	6,746,762

Table 1 Represents population estimates for counties in HSTCC region, data.gov, 2016.

While the entire region has grown in population, the population is distributed unevenly across the region. Jasper and Newton counties experienced the majority of the growth and hold the highest population densities in the region. Figure 2 (see following page) displays the distribution of population throughout the region. In terms of population density, the HSTCC region varies widely between its rural and urban areas. The average population density of the entire region is nearly 100 persons per square mile. As the region grew, it became more diverse. The region’s population is predominantly white.

However, the diversity of the population has increased significantly since 2000. In 2000, the white population accounted for 92.7 percent of the population (HSTCC, 2009). By 2010, the white population fell to 88.6 percent of the total population.

The HSTCC region’s population is aging. In 2012, the population over age 65 accounts for 14.1 percent of the entire population, up from 13.7 percent in 2000. The State of Missouri has experienced similar increases. Between 2000 and 2012, the population over the age of 65 grew from 26,323 to 29,642. Simultaneously, the population under 18 years of age grew from 50,475 to 54,465 during the same time period. Also, the population between ages 18 and 64 increased from 114,746 in 2000 to 126,098. These changes in the age of the population may significantly impact on the economy of the region.

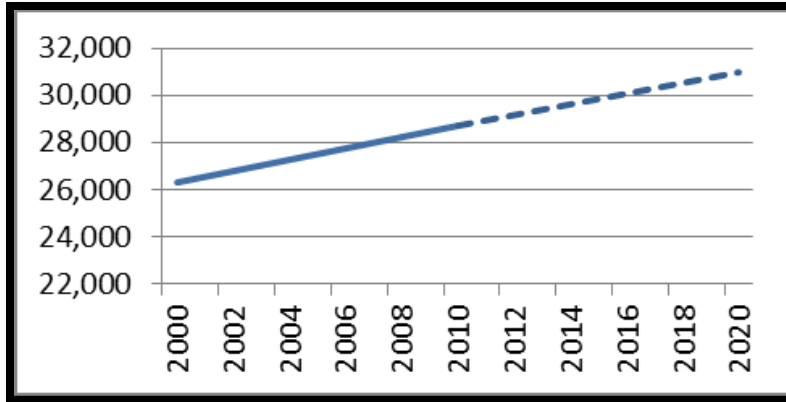


Table 2 represents aging citizens projected over a twenty year period in the HSTCC region.

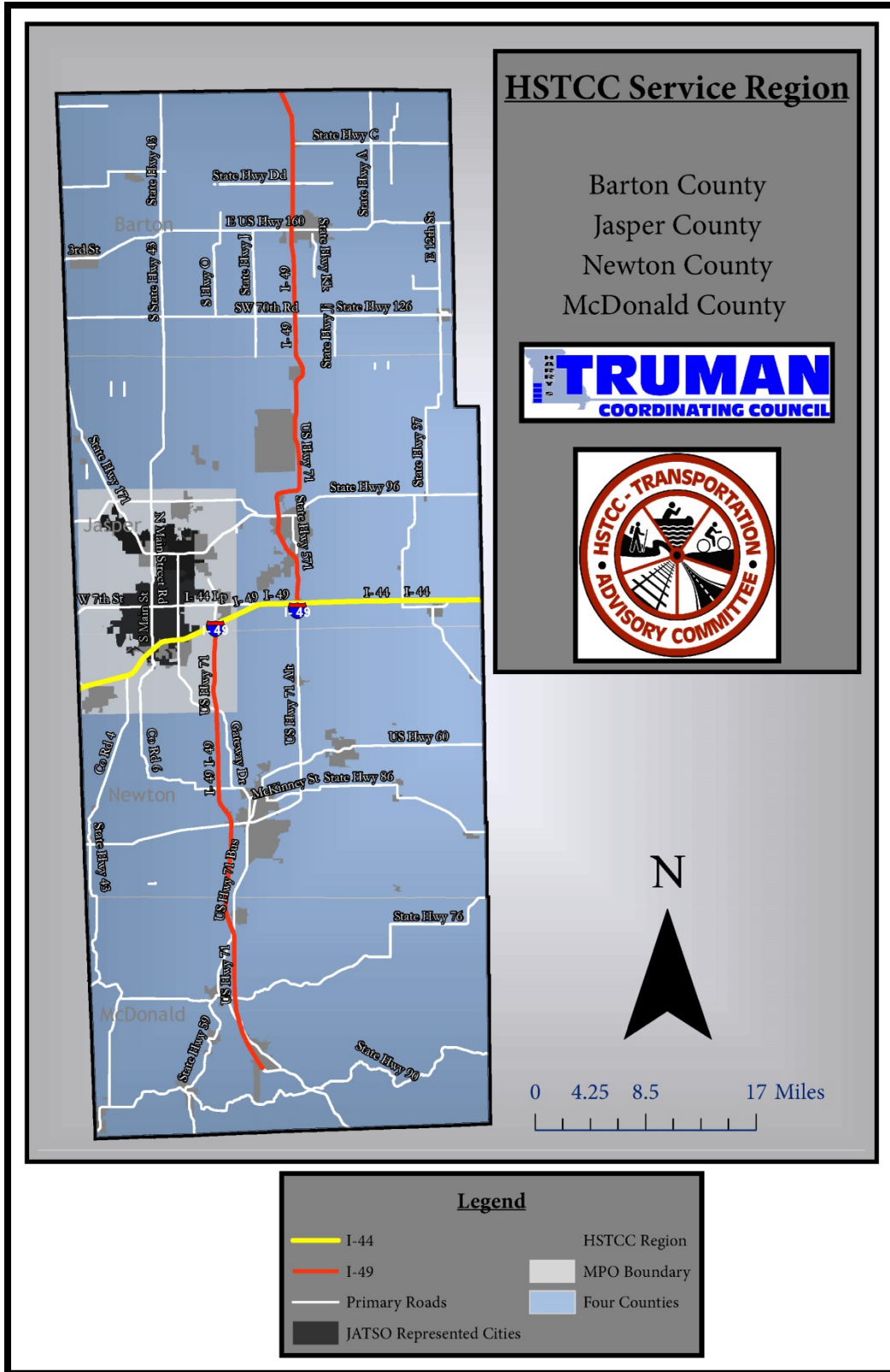
Population served (in relation to regional population)

The HSTCC region consists of a four-county area in the southwest corner of Missouri. The HSTCC region is centrally located in the United States. The nearest metropolitan area outside of the region is Springfield, Missouri, 70 miles to east. The metropolitan areas of Little Rock, Tulsa, Oklahoma City, Wichita, Kansas City and St. Joseph all lie within a 200-mile radius. St. Louis, Omaha, Dallas and Memphis lie within a 300-mile radius of the region.

Within the boundaries of the region lie 58 separate communities. These communities vary in population from a mere few dozen to nearly 50,000. Several significantly larger communities including the cities of Joplin, Webb City, Carthage, Carl Junction, Lamar, and Neosho reside within the HSTCC region. The Joplin Metropolitan Statistical Area is composed of Jasper and Newton counties and is anchored by the City of Joplin.

The HSTCC region covers an area of approximately 2,400 square miles. The boundaries of the region form a rectangle with dimensions of approximately 31 miles east to west and 77 miles north to south. The HSTCC region holds approximately 211,000 people, 96,000 jobs and 80,000 households.

At HSTCC, we serve paying cities and counties we call members, of our four county region, Barton, Jasper, Newton, and McDonald Counties.



Map 2 represents HSTCC service region in MO, 2017.

Governing body make-up

The Harry S Truman Coordinating Council (HSTCC) is governed by a Board of Directors comprised of the dues-paying paid members of the organization. Each local government (county and/or municipality) is assessed a membership fee based on decennial census. Once the local government had paid its assessed fee to the HSTCC office, that entity has full access to the rights and privileges of membership.

For the past two years, Barton County and Newton County have chosen not to pay their dues, and therefore are not members of the HSTCC Board of Directors.

City of Alba	City of Lamar	Village of Wentworth
City of Anderson	City of Lanagan	City of Webb City
City of Asbury	City of Liberal	Jasper County -
City of Carl Junction	City of Neck City	unincorporated area
City of Cartersville	City of Neosho	McDonald County -
City of Carthage	City of Noel	unincorporated area
City of Diamond	City of Oronogo	Town of Fidelity
City of Duquesne	City of Pineville	Village of Airport Drive
City of Fairview	City of Purcell	Village of Avilla
City of Goodman	City of Sarcoxie	Village of Dennis Acres
City of Granby	City of Seneca	Village of Jane
City of Jasper	City of Southwest City	
City of Joplin		
Village of Leawood		
Village of Newtonia		
Village of Saginaw		
Village of Shoal Creek		
Drive		

The Board of Directors elects an Executive Committee each year. That Executive Committee is responsible for the oversight of the organization and the Executive Director.

The Executive Committee should be comprised of one representative from each county government, along with one representative from each county that represents the cities in that county. The City of Joplin has a stand-alone representative on the Executive Committee.

2016-2017 Executive Committee:

Gary Turner (Sarcoxie) -- CHAIR
 Steve Lawver (Carl Junction) – VICE CHAIR
 Cyndi Hutchings (Seneca) – SECRETARY/TREASURER

John Bartosh (Jasper County)
 John Bunch (McDonald County)
 Karla McNorton (Goodman)
 Gary Shaw (Joplin)
 Lynn Calton (Lamar)
 Dana Daniel (Neosho)
 Ceri Otero (Carthage)

Internally, the HSTCC constitutes of representatives from the counties and communities in Barton, Jasper, Newton, and McDonald counties. The HSTCC Board of Directors is elected each June. The board monitors the activities of staff as they work towards the goals and objectives outlined in this document. As regional priorities change, the board will direct the staff to pursue those activities that it considers new priorities. The HSTCC Board of Directors is listed in the following table.

Name	Entity	Position	Entity Type
Steve Lawver	City of Carl Junction	City Administrator	Government
John Bartosh	Jasper County	Commissioner	Government
Gary Shaw	City of Joplin	Councilmember	Government
Jim Jackson	Newton County	Commissioner	Government
Troy Royer	City of Neosho	City Administrator	Government
Jim Swatsenbarg	City of Carthage	Councilmember	Government
Mike Davis	Barton County	Commissioner	Government
Lynn Calton	City of Lamar	City Administrator	Government
Bill Martin	Village of Jane	Chairman	Government
John Bunch	McDonald County	Commissioner	Government

Mark Turnbull	Joplin Regional Partnership	Director	Other
Alison Malinowski	Lafayette House	Director	Other
Jane Ballard	Ballard Publications	Owner	Other
Gary Turner	Sarcoxie Economic Development	Director	Other
Gabe Lett	Tri-State Engineering	VP of Marketing	Other
Jasen Jones	Workforce Investment Board	Director	Other

Table 3 Current HSTCC board members, 2017.

Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Harry S Truman 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 Harry S Truman 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 Harry S Truman Title VI Complaint Form at [web address], or request a copy by writing to 800 E Pennell Carl Junction, MO 64834 Information on how to file a Title VI complaint may also be obtained by calling Jill Cornett at 417649/6400.

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:

Jill Cornett
Harry S Truman Coordinating Council
800 E Pennell
Carl Junction, MO 64834
jcornett@hstcc.org

COMPLAINT ACCEPTANCE: Harry S Truman Coordinating Council will process complaints that are complete.

Once a completed Title VI Complaint Form is received, Harry S Truman Coordinating Council will review it to determine if Harry S Truman Coordinating Council has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Harry S Truman Coordinating Council.

INVESTIGATIONS: will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Harry S Truman Coordinating Council may contact the complainant. Unless a longer period is specified by Harry S Truman Coordinating Council, the complainant will have ten (10) days from the date of the letter to send requested information to the Harry S Truman Coordinating Council 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 Harry S Truman Coordinating Council'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. The Harry S Truman Coordinating Council 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, the Harry S Truman Coordinating Council 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 417/649/6400 at [800 E Pennell Carl Junction, MO 64834, or at 417/649/6400.

Monitoring Title VI Complaints, Investigations, Lawsuits *and* Documenting Evidence of HSTCC Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in Harry S Truman Coordinating Council'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.

HSTCC 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

Table 4 HSTCC complaint log form

Documenting Evidence of HSTCC Staff Title VI Training

The Harry S Truman'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?

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

The Harry S Truman Coordinating Council ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The Harry S Truman Coordinating Council'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, the Harry S Truman Coordinating Council 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.

2018–2021 Title VI Program Public Engagement Process

The Harry S Truman Coordinating Council will conduct a Public Engagement Process for the 2018-2021 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.

The Harry S Truman Coordinating Council [will provide] [provided] briefings to the Board of Directors and Advisory Bodies.

The Harry S Truman Coordinating Council will conduct a 30 day public comment period to provide opportunities for feedback on the 2018-2021 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool, such as Survey Monkey

Summary of 2014-2017 Public Outreach Efforts

It is a common practice to distribute meeting, workshop, and conference information in languages other than English. Also, if a request is made to have a second language speaker or interrupter HSTCC has an individual on demand for any requests for multi-language material.
HSTCC meeting minutes are all available on the website along with agendas. HSTCC conducts Executive Board meeting every other month.

Language Assistance Plan

The Harry S Truman Coordinating Council Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address the Harry S Truman Coordinating Council'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 Harry S Truman Coordinating Council covers Barton, Jasper, Newton, and McDonald Counties in the southwestern corner of the state. There are 226,275 people that reside in the four county region and out of those 226,275 people 7.6% of the individuals five years and older speak English less than well.

The Harry S Truman Coordinating Council 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 the Harry S Truman Coordinating Council. 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, the Harry S Truman Coordinating Council 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 Harry S Truman Coordinating Council service area are proficient in the English language. Based on 2010 Census data, 7.6 % of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency.

LEP Population in HSTCC Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Barton County	Jasper County	Newton County	McDonald County	Overall Population 5 Years and Older
Population 5 Years and Over	25,453	108,960	55,074	21,172	210,659
Speak English “less than very well”	1,035	3,268	1,742	1,401	7,446
Spanish	977	6,103	756	1,873	9,709
Speak English “less than very well”	1,253	5,777	746	973	8,749
Other Indo-European	185	988	456	263	1,892
Speak English “less than very well”	49	202	132	58	441
Asian and Pacific Island	84	839	973	498	2,394
Speak English “less than very well”	9	48	264	230	551
All Other	16	100	114	236	466
Speak English “less than very well”	0	16	12	24	52

Table 5 LED population in HSTCC service area, data.gov, 2017.

	Total Pop.	% White	%Black	% Am. Indian	% Asian	% Native Hawaiia n	% Other
HSTCC Region	210,816	91	1.7	1.8	1.1	0.3	1.0
Barton County	12,286	94.4	0.2	0.9	1	0	1.4
Jasper County	116,996	91	2.3	1.2	0.9	0.3	1.1
Newton County	58,683	90.8	1	2.9	1.4	0.3	0.8
McDonald County	22,851	89.4	1.3	2.2	1.2	0.6	0.9
Missouri	6,028,076	82.8	11.5	0.4	1.7	0.1	1.1

Table 6 Percent of minorities in the HSTCC region, data.gov, 2017.

One of the fastest growing ethnicities in the HSTCC region is Hispanics and Latinos. The Hispanic and Latino population grew substantially between 2000 and 2010; jumping from 6,911 to 13,382 in population. Hispanics and Latinos accounted for 3.6 percent of the population in 2000 and 6.3 percent in 2010. As of 2014, the Hispanic and Latino population grew to 14,034 which accounts for 6.6 percent.

County	% Hispanic
Barton County	2.2%
Jasper County	7.2%
Newton County	4.7%
McDonald County	11.3%

Table 7 Percent of Hispanics in HSTCC region, data.gov, 2017.

2. Frequency of Contact by LEP Persons with the Harry S Truman Coordinating Council’s Services:

The Harry S Truman Coordinating Council staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, the Harry S Truman Coordinating Council has, on average, [only one or two requests per month] for an interpreter. The Harry S Truman Coordinating Council averages 60 phone calls per month.

LEP Staff Survey Form

The Harry S Truman Coordinating Council's 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	N/A
Weekly	N/A
Monthly	N/A
Less frequently than monthly	N/A

3. The importance of programs, activities or services provided by the Harry S Truman Coordinating Council to LEP persons:

Outreach activities, summarized in the Harry S Truman Coordinating Council'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: The Harry S Truman Coordinating Council

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 the Harry S Truman Coordinating Council 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: Based on our demographic analysis (Factor 1) the Harry S Truman Coordinating Council has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

The Harry S Truman Coordinating Council will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to the Harry S Truman Coordinating Council staff:

1. Information on the Harry S Truman Coordinating Council 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 the Harry S Truman Coordinating Council’s Title VI Plan requirement.

The Harry S Truman Coordinating Council 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 presenting the Harry S Truman Coordinating Council 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 the Harry S Truman Coordinating Council 's financial resources are sufficient to fund language assistance resources as needed.

6. Determine whether the Harry S Truman Coordinating Council has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning the Harry S Truman Coordinating Council's failure to meet the needs of LEP individual.

Sub recipient Assistance

Sub recipient Assistance

OPTION A

The Harry S Truman Coordinating Council does not have any sub recipients.

OPTION B

Primary recipients should provide sub recipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a sub recipient.
- Direction regarding obtaining demographic information of population served by sub recipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

Sub recipient Monitoring

Sub recipient Monitoring

OPTION A

The Harry S Truman Coordinating Council does not have any sub recipients.

OPTION B

Primary recipients must monitor sub recipients.

- Non-compliant sub recipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all sub recipients are complying with the general and specific requirements.
- Collect and review sub recipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that sub recipients who provide transportation services verify that their level and quality of service is equitably provided.

Equity Analysis of Facilities

OPTION A

The Harry S Truman Coordinating Council has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

OPTION B1

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping
Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

OPTION B2

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping
Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, the “two-test” exercise was conducted and it was determined that the facility [facilities] could proceed, despite disparate impact, due to a “substantial legitimate justification” to meet a goal that is integral to the agency’s institutional mission. In addition, no comparable effective alternative location(s) would result in less disparate impact.

System-Wide Service Standards and Policies*

****applies to all fixed route providers (including those that do not meet volume threshold)***

**Template for System-Wide Service Standards (1. 2. 3. 4.)
is presented in detail
in FTA Circular 4702.1B Appendix G.**

**Template for System-Wide Service Policies (1. 2.)
is presented in detail
in FTA Circular 4702.1b Appendix H.**

NOTE: Template for **Major Service Change and Impact Policies**
is located at O. Service and Fare Equity Analysis.

Title VI & Environmental Justice

On February 11, 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations. The Executive Order provides that “each agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” In support of Executive Order 12898, U.S. DOT issued an Order on Environmental Justice (DOT Order 5610.2). This order clarifies and reinforces Title VI responsibilities in federally financed transportation projects.

For More Information

If you have any questions, comments, or concerns regarding Title VI please contact:

Jill Cornett
Harry S Truman Coordinating Council
800 E Pennell
Carl Junction, MO 64834
jcornett@hstcc.org

How to file a Complaint

HARRY S TRUMAN 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:

Jill Cornett
Executive Director
Harry S Truman Coordinating Council
800 E Pennell
Carl Junction, MO 64834
416-649-6400
jcornett@hstcc.org

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 () 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)	

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

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, you may file a complaint up to 180 days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the locations, names, and contact information of any witnesses.

The complaint may be filed in writing to:

Jill Cornett
Executive Director
Harry S Truman Coordinating Council
800 E Pennell
Carl Junction, MO 64834
416-649-6400
jcornett@hstcc.org

Appeal

If the request for reconsideration is denied, the Complainant may appeal the HSTCC Executive Director's response by submitting a written appeal to HSTCC Executive Board no later than 10 calendar days after receipt of the HSTCC Executive Director's written decision rejecting the reconsideration. The HSTCC Executive Board will review all the information and documents that have been submitted and determine whether they agree or disagree with the Executive Director's decision. The Complainant will be notified no later than 45 calendar days from the date of appeal to the Board of the Board's decision.

Submission of Complaint to the State of Missouri Department of Transportation

If the Complainant is dissatisfied with HSTCC's resolution of the Complaint, he or she may also submit a written Complaint within 180 days after the alleged date of discrimination to the State of Missouri Department of Transportation for investigation:

MODOT
3025 E. Kearney Street
P.O. BOX 868
Springfield, MO 65801
Phone: 1-888-ASK-MODOT/ 417-895-7600
Fax: 417-895-771

The Harry S Truman Coordinating Council 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: _____

