



City of West Plains
1910 Holiday Lane
West Plains, Mo.
417.256.7176

August 13, 2025

To: Sam Anselm, City Administrator

From: Darryl Newcomb, Transit Manager

Re: West Plains Transit System- Title VI Program Adoption

Executive Summary

The City of West Plains is requesting adoption of the amended West Plains Transit System Title VI Program, in compliance with Title VI of the Civil Rights Act of 1964 and requirements set forth by MoDOT. The program outlines the city's commitment to ensuring that no person is excluded from participation in, denied the benefits of, or subjected discrimination under any transit program or activity.

Discussion

Title VI compliance is a condition for receiving federal transit funding and support through MoDOT. The West Plains Transit System has revised its Title VI Program to reflect current practices, demographic data, complaint procedures, and public participation strategies. Adoption of this updated program is necessary to maintain eligibility for ongoing and future funding. The city's most recent Title VI adoption occurred in 2022 is addressed every 3 years.

Fiscal Impact

There is no direct fiscal impact associated with the adoption of this resolution. However, adoption is necessary to maintain access to state and federal transit funding, which supports the operation and development of the West Plains Transit System.

BILL NO. 2025-17

RESOLUTION NO. _____

A RESOLUTION OF THE CITY OF WEST PLAINS, MISSOURI, ADOPTING THE WEST PLAINS TRANSIT SYSTEM TITLE VI PROGRAM AS AMENDED AUGUST 13, 2025.

WHEREAS, the City of West Plains recognizes the importance of compliance with Title VI of the Civil Rights Act of 1964 and its implementing regulations; and

WHEREAS, the West Plains Transit System has developed an amended Title VI Program, dated August 13, 2025, to satisfy the requirements of the Missouri Department of Transportation (MoDOT); and

WHEREAS, the City of West Plains desires to formally adopt the amended Title VI Program to ensure continued compliance and support equitable access to transit services.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF WEST PLAINS, MISSOURI AS FOLLOWS:

Section 1: The City Council hereby adopts the amended West Plains Transit System Title VI Program, dated August 13, 2025, hereto attached as Exhibit A.

Section 2: The Transit Manager is hereby authorized to submit the adopted program and any related documentation necessary to implement this resolution and maintain compliance with MoDOT and federal regulations.

Section 3: This resolution shall be in full force and effect from and after its passage and approval, as provided by law.

PASSED AND APPROVED THIS ____ DAY OF _____, 20__.

CITY OF WEST PLAINS, MISSOURI

(SEAL)

MAYOR MICHAEL TOPLIFF

ATTEST:

CITY CLERK KELLIE MAYERS

Title VI Program

Date filed with MoDOT Transit Section:

8/13/2025

This TEMPLATE is provided by the Missouri Department of Transportation (MoDOT) Transit Section, as a resource for producing the triennial Title VI Program document for Federal Transit Administration recipients and subrecipients. FTA Circular 4702.1B, dated October 1, 2012, *“Title VI Requirement and Guidelines for Federal Transit Administration Recipients”* was the primary source of material for this template. Use of this template does not override each agency’s responsibility to interpret the requirements as expressed in FTA Circular 4702.1B, or as amended in the future.

This template is available online under Presentations – Title VI Presentation Template at the following link:

<http://www.modot.org/othertransportation/transit/transitapplicationsreportsprograms.htm>

Check this link periodically for most recent, dated template updates.

Template revision date: November 2023

Table of Contents

A. Title VI Assurances	2
B. Agency Information	3
C. Notice to the Public.....	5
D. Procedure for Filing a Title VI Complaint	7
E. Monitoring Title VI Complaints, Investigations, Lawsuits <i>and</i> Documenting Evidence of Agency Staff Title VI Training	9
F. Public Engagement Plan.....	11
G. Language Assistance Plan	16
West Plains Transit System’s Limited English Proficiency Plan.....	16
Four Factor Analysis	16
Staff LEP Training	21
Monitoring and Updating the LEP Plan.....	21
H. Advisory Bodies.....	23
I. Subrecipient Assistance	24
J. Subrecipient Monitoring.....	25
K. Equity Analysis of Facilities	26
L. Fixed Route Transit Providers	27
M. Attachments.....	28
Attachment 1: Click or tap here to enter text. TITLE VI/ADA COMPLAINT FORM.....	28

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 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).

Signed: _____

Title: Transit Manager _____

Date: _____ 8/18/2025 _____

B. Agency Information

1. **Mission of West Plains Transit System**

To provide safe, reliable and affordable transportation for members of our community.

2. **History (including year started)**

West Plains Transit is a public transportation service of the City of West Plains, Missouri. West Plains Transit began operations in 1982.

3. **Regional Profile (regional population; growth projection)**

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.

4. **Population served (in relation to regional population)**

According to the 2016-2020 American Community Survey, West Plains' population was 12,184. 18.1 percent of the population was 65 years of age or over. From 2016-2020 persons below the poverty level were 32.4 percent of the population. Median household income during that period was \$37,154

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



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

. 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.

C. Notice to the Public

Notifying the Public of Rights under Title VI

West Plains Transit System 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.

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.

For more information on the West Plains Transit System's Title VI program, and the procedures to file a complaint, contact Mike Falwell at 417-256-1241; mike.falwell@westplains.gov; or visit our administrative office at City Hall, 1910 Holiday Lane, West Plains MO. For more information visit www.westplainsgov.

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.

To obtain additional information about your rights under Title VI, contact: West Plains Transit System at (417)256-1241

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

1. Complaint Forms may be obtained from West Plains Transit System drivers, at www.westplains.gov, or at City Hall, 1910 Holiday Lane, West Plains, Missouri.
2. 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, 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, dated, and include your contact information.

If information is needed in another language, contact West Plains Transit System at 303 Jackie Garrett Drive, or at (417)256-1241

This Notice is posted on our agency's website, in public areas of our agency, within transit facilities, and within transit vehicles.

D. Procedure for Filing a Title VI Complaint

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, in public areas of our agency, within transit facilities, and within transit or paratransit vehicles

You may download the West Plains Transit System Title VI Complaint Form at www.wesatplains.gov, 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 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 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. Once a completed Title VI Complaint Form is received, The 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 the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant disagrees with West Plains Transit System'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. 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 Determination Letter for cases where reconsideration is granted summarizes the allegations, the original finding, the basis for reconsideration, the final findings, and what remedial action(s) are necessary disciplinary action, additional training of the staff member, or other action will occur.

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.

West Plains Transit System will notify the Missouri Department of Transportation of all Discrimination complaints within **72 hours** by contacting the MoDOT Title VI Coordinator via the External Civil Rights main line at (573) 526-2978; or via e-mail at TitleVI@modot.mo.gov.

If information is needed in another language, contact West Plains Transit System at 303 Jackie Garrett Drive West Plains, MO, or at (417)256-1241

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.

During the reporting period, West Plains Transit System 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

West Plains Transit System'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?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

The following Title VI training will be provided to West Plains Transit System's staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and West Plains Transit System's obligations under Title VI.
2. Information regarding displayed Title VI information and program materials such as the Title VI Nondiscrimination Notice to the Public.
3. Information on West Plains Transit System's Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on West Plains Transit System's outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

West Plains Transit System will identify staff that are likely to routinely encounter or have frequent contact with members of the public and/or customers, as well as their supervisors and all management staff. West Plains Transit System will include the Title VI training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their Title VI responsibilities on a *yearly* basis.

The Title VI training will be administered in conjunction with training on West Plains Transit System's Language Assistance Plan and a summary of the agency's LEP responsibilities as discussed in the later Section G. "Language Assistance Plan."

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. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin West Plains Transit System's public participation activities.

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:

- 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 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. 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.

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 the following various means
 - i. Dedicated email address at *mike.falwell@westplains.gov*
 - ii. Website at *www.westplains.gov*
 - iii. Regular mail at *1910 Holiday Lane West Plains, MO 65775*
 - iv. Forms using survey tool for compilation such as *Survey Monkey*
 - v. Videotaping which is submitted to *[provide avenue and location]*
 - vi. Phone calls to Customer Service Center at *(417)256-1241*

4. Response to Public Input

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

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

Additional Best Practices Include:

- a. The distribution of agency materials and information such as *brochures*.
- b. Advertised public announcements through newspapers, fliers, or radio stations.

2024-2026 Title VI Program Public Engagement Process

West Plains Transit System will conduct a Public Engagement Process for the 2024-2026 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.

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

West Plains Transit System will conduct a 30-day public comment period to provide opportunities for feedback on the 2024-2026 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)

Three-Year Summary of Public Outreach Efforts

West Plains Transit System has undertaken the following public outreach efforts within the last three calendar years:

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.

Title VI information was included in map/route signage in all 7 bus stop shelters.

Radio ad for transit services

Attend City Council Meetings

Ads in the Horse Trader- Local Newspaper for transit services.

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 seek meaningful access to services provided by West Plains Transit System. Meaningful access is language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. 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:

The “Safe Harbor Provision” stipulates a recipient is to provide written translation of vital documents for each eligible Limited English Proficient (LEP) language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population five years of age and older eligible to be served or likely to be affected or encountered.

The U.S. DOT Language Access Plan defines “vital documents” as “paper or electronic written material that contains information that is critical for accessing a component’s programs, services, benefits, or activities; directly and substantially related to public safety; or required by law.” The FTA Circular 4702.1B specifies the Title VI Notice to the Public, Title VI Complaint Procedures, and Title VI Complaint Form are vital documents.

Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Safe Harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Based on the 2023 5-Year American Community Survey data for Table C16001 for West Plains Transit System’s service area consisting of West Plains, MO, 11,129 persons or 97.06% of the total population five years of age and older of 11,466 speak only English. A total of 35 or less than 0.01% of the total population speak English “less than very well” – a definition of Limited English Proficiency.

Currently, no LEP language group(s) meet the Safe Harbor threshold. However, efforts will be made to reasonably accommodate any language access requests that arise.

Language Spoken at Home for the Population 5 Years and Over					
Source: 2023: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001					
Population 5 years and over by language spoken at home and ability to speak English	West Plains, MO	[Enter Name of Service Area 2]	[Enter Name of Service Area 3]	Service Area Total	Percentage of Total Population 5 Years and Older
Total Population 5 Years and Over	11,466			11,466	100.00%
Speak Only English	11,129			11,129	97.06%

Total Speak English “less than very well”	35				0.00%
Spanish	201				
Speak English “less than very well”	16			16	0.14%
French, Haitian, or Cajun	45			45	
Speak English “less than very well”	0			0	0.00%
German or other West Germanic languages	26				
Speak English “less than very well”	13			13	0.11%
Russian, Polish, or other Slavic languages	0			0	
Speak English “less than very well”	0			0	0.00%
Other Indo-European languages	0			0	
Speak English “less than very well”	0			0	0.00%
Korean	0			0	
Speak English “less than very well”	0			0	0.00%
Chinese (incl. Mandarin, Cantonese)	0			0	
Speak English “less than very well”	0			0	0.00%
Vietnamese	37			37	
Speak English “less than very well”	0			0	0.00%
Tagalog (inc. Filipino)	18			18	
Speak English “less than very well”	6			6	0.05%
Other Asian & Pacific Island languages	4			4	
Speak English “less than very well”	0			0	0.00%
Arabic	0			0	
Speak English “less than very well”	0			0	0.00%
Other and unspecified languages	6			6	

Speak English "less than very well"	0			0	0.00%
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2. Frequency of Contact by LEP Persons with West Plains Transit System's Services:

The West Plains Transit System 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 per month for an interpreter. West Plains Transit System averages 0 phone calls per month.

<p>LEP Staff Survey Form</p> <p>West Plains Transit System is studying the language assistance needs of its riders so that we can better communicate with them if needed.</p> <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?
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Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	0
Weekly	0
Monthly	0
Less frequently than monthly	0

Language Assistance Requests Log

<u>Date</u>	<u>Language Spoken by Individual (If Available)</u>	<u>Name</u>	<u>Phone Number or Email (If Available)</u>	<u>Service(s) Requested</u>	<u>Staff Member Providing Aid</u>	<u>Notes and Follow-Up</u>

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/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing 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 West Plains Transit System and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, qualified interpreters and translators can be provided.
2. Language identification flashcards and/or "I speak" Cards
3. Bilingual Staff (willing and qualified)
4. Taglines on vital documents informing LEP persons of the availability of translation upon request, and how to obtain them.
5. Automated translation technology (such as Google Translate)

To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

Based on our demographic analysis (Factor 1) West Plains Transit System has determined that no language group(s) within its service area meet the Safe Harbor threshold requiring written translated "vital documents" by language group(s). Should Factor 1 in the Four Factor analysis indicate in the future that an LEP group reaches the safe harbor threshold, West Plains Transit System will evaluate its vital documents and provide translations.

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

Overall Costs:

The overall costs for strategies for engaging individuals with Limited English Proficiency will be determined at the time it is needed, as prices may change the West Plains Transit System will support the costs from our general funds operating budget.

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 Title VI responsibilities pertaining to their specific duties.
2. Information on West Plains Transit System's Language Assistance Plan and LEP Responsibilities.
3. Information on the written and oral language assistance services available, and instructions on how agency staff can access these products and services.
4. Information on how to respond to LEP callers, written communications from LEP persons, how to respond to in-person contact from LEP persons, and how to arrange providing language assistance services.
5. Use of Language Identification Flashcards such as "I Speak" Cards.
6. Documentation of language assistance requests by maintaining a Language Assistance Requests Log

West Plains Transit System will identify staff that are likely to routinely encounter or have frequent contact with LEP persons, as well as their supervisors and all management staff in order to target training to appropriate staff. West Plains Transit System will include the LEP training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons on a Yearly basis.

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. The plan will be reviewed and updated on a triennial basis, at minimum, or 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. Advisory Bodies

- Planning Boards, Advisory Councils and Committees are not applicable to West Plains Transit System's Title VI Program.

I. Subrecipient Assistance

Subrecipient Assistance

West Plains Transit System does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

West Plains Transit System does not have any subrecipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when West Plains Transit System constructs facilities, such as storage facilities, maintenance facilities, or operations centers. The term “facilities” does not include bus shelters, transit stations, or power substations. The equity analysis will be conducted during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

The equity analysis is conducted to determine whether the location of the project will result in a disparate impact on minority communities on the basis of race, color, or national origin. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site.

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

Equity Analysis Guidance

Refer to FTA Title VI Circular 4702.1B Chapter III, section 13.

Demographic data and mapping

Guidance may be obtained from either a Regional Planning Commission or Metropolitan Planning Organization.

L. Fixed Route Transit Providers

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

M.Attachments

Attachment 1: Click or tap here to enter text. 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:

City Administrator
West Plains Transit
PO Box 710
West Plains, MO 65775
Email: sam.anselm@westplains.gov 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) () 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

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