



COLE COUNTY RESIDENTIAL SERVICES, INC.

Civil Rights Title VI Plan

2024

Date adopted by CCRSI Board of Directors:

JULY 23, 2024

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	6
E. Monitoring Title VI Complaints, Investigations, Lawsuits <i>and</i> Documenting Evidence of Agency Staff Title VI Training	8
F. Public Engagement Plan	10
G. Language Assistance Plan.....	13
Cole County Residential Services, Inc., Limited English Proficiency Plan.....	13
Four Factor Analysis	13
Staff LEP Training.....	17
Monitoring and Updating the LEP Plan	17
H. Advisory Bodies	18
CCRSI does not have any non-elected committees and councils, the membership of which is selected by the recipient.....	18
I. Subrecipient Assistance.....	18
J. Subrecipient Monitoring	18
K. Equity Analysis of Facilities.....	18
L. Fixed Route Transit Providers	19
M. Attachments.....	20
Attachment 1: CCRSI's TITLE VI/ADA COMPLAINT FORM	20

A. Title VI Assurances

Cole County Residential Services, Inc. (CCRSI) 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.

CCRSI 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. CCRSI 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.

CCRSI meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including CCRSI 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).

CCRSI receives federal funds through contracts and grants administered by the Missouri Department of Transportation for capital equipment. As a sub-recipient of this funding, we are committed to assuring compliance with the Title VI Requirements for Federal Transit Administration recipients as outlined in FTA Circular 4702.1B.

This plan was developed to guide CCRSI in its administration and management of Title VI-related activities.

Signed:  - Nate Sattenfield

Title: Executive Director

Date: 07/23/2024

B. Agency Information

1. Mission of CCRSI

CCRSI respects individual choice by providing quality services and supports to people who have developmental disabilities.

2. History (including year started)

In 1979, the citizens of Cole County, Missouri passed legislation (commonly referred to as SB40) allowing its citizens to tax themselves for services and supports for people with developmental disabilities. The legislation calls for the County Commission to appoint a nine-member Board of Directors. This Board was originally called Cole County Group Homes for the Developmentally Disabled but later changed its name to Cole County Special Services. In 1980, the Board incorporated a 501c3 non-profit to administer the business of Cole County Special Services and provide services and supports it chooses to fund. This 501c3 is called Cole County Residential Services, Inc. CCRSI entered into agreements with the Missouri Department of Mental Health to provide Medicaid and Medicaid Waiver services and supports. These services are paid with federal, state and county funds.

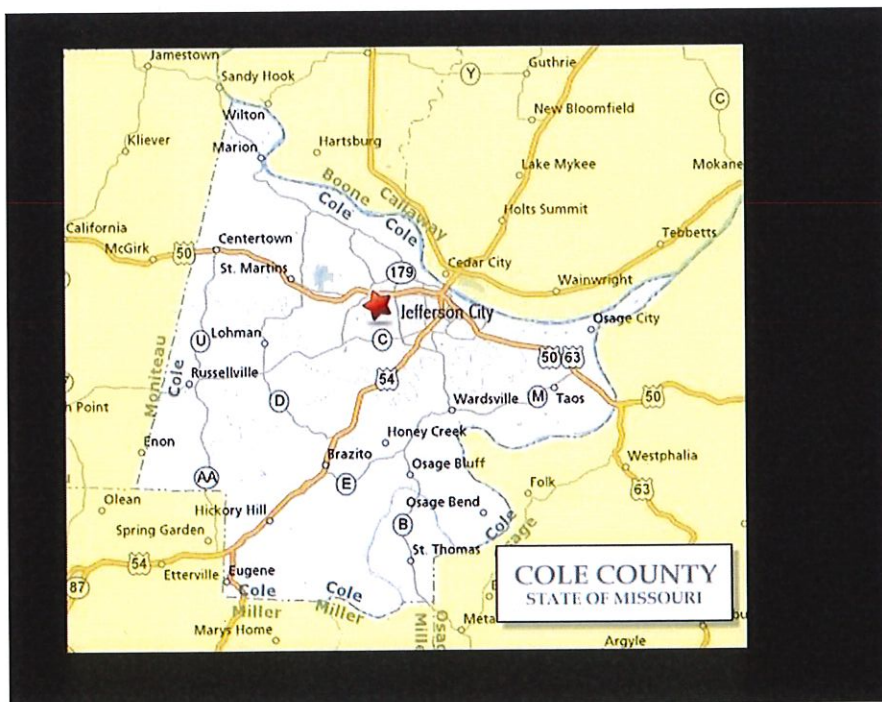
3. Regional Profile (regional population; growth projection)

CCRSI serves citizens of Cole County, Missouri. Drivers primarily provide transportation for client programs as defined by client's annual Individual Plans. We also provide transportation to work, to pick up prescriptions, to medical and nutrition appointments, for essential shopping, to recreation events and for various other purposes to meet clients' daily needs. These services have been relatively consistent for the last few years.

4. Population served (in relation to regional population)

CCRSI provides services and supports to individuals who have a developmental disability and live in Cole County, Missouri or have a legal guardian in Cole County, Missouri.

5. Service area Cole County, Missouri



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

CCRSI is governed by a 9-member Board of Directors comprised of at least two individuals related in the third degree by blood or marriage to a person with developmental disabilities. The Board of Directors meets twelve times per year at the CCRSI Administrative Office building in Jefferson City, MO. The Board of Directors is a policy making board and governed by a set of bylaws.

CCRSI Board members are appointed by the Cole County Special Services (CCSS) Board. After members are appointed to the CCSS Board by the County Commission, the CCSS Board appoints itself to the CCRSI Board. Both boards follow the same 3-year term appointed by the County Commission. Every year, three members' terms expire. If those members are re-appointed to the CCSS Board, they also continue to serve on the CCRSI Board. Each Board Member serves until he/she resigns or is replaced. Eight of the nine Board members must be residents of Cole County.

The current makeup of the Board of Directors is as follows: 5 (60%) Males; 4 (40%) Females; and 0 Minorities.

All CCRSI meetings are open to the public and are posted in CCRSI Administrative Offices and on CCRSI's website, www.ccrsi.org.

C. Notice to the Public

Notifying the Public of Rights under Title VI/ADA

CCRSI posts Title VI/ADA notices on our agency's website, and in public areas of our agency.

CCRSI 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. And, CCRSI operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans with Disabilities Act of 1990. For more information on the CCRSI's Title VI program, and the procedures to file a complaint, contact CCRSI's Executive Director at 573-634-4555; email titlevi@ccrsi.org; or visit our administrative office at 1908 Boggs Creek Road, Jefferson City, MO 65101. For more information visit www.ccrsi.org.

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

To obtain additional information about your rights under Title VI, contact: CCRSI Administrative Offices at 1908 Boggs Creek Road, Jefferson City, MO 65101

How to file a Title VI/ADA complaint with CCRSI:

1. A Complaint Form is available by clicking the following link [CCRSI Title VI Complaint Form \(jotformpro.com\)](http://jotformpro.com) which will take you directly to our online complaint form; Complaint Procedures are available by clicking this link [Filing a Title VI/ADA Complaint – Cole County Residential Services, Inc. \(ccrsi.org\)](http://ccrsi.org) For additional information please contact CCRSI Administrative Offices 573-634-4555 and request a copy by fax, mail, or email to titlevi@ccrsi.org.
2. In addition to the complaint process at CCRSI, 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 CCRSI Administrative Offices at 1908 Boggs Creek Road, Jefferson City, MO 65101, or at 573-634-4555.

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

D. Procedure for Filing a Title VI Complaint

See Title VI
Complaint Form

ATTACHMENT 1

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of CCRSI'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 CCRSI 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 CCRSI Title VI Complaint Form at www.ccrsi.org, or request a copy by writing to CCRSI, 1908 Boggs Creek Road, Jefferson City MO 65101 . Information on how to file a Title VI complaint may also be obtained by calling 573-634-4555.

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 TitleVI@ccrsi.org, or Executive Director, CCRSI, 1908 Boggs Creek Road, Jefferson City, MO 65101.

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

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

CCRSI 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 CCRSI, Administrative Offices at 1908 Boggs Creek Road, Jefferson City, MO 65101, or at 573-634-4555.

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 CCRSI'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, CCRSI had 0 Title VI Complaints, therefore included log below contains no data.

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

CCRSI'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 CCRSI's staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and CCRSI'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 CCRSI's Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on CCRSI's outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

CCRSI 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. CCRSI 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 CCRSI'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 involvement from agency riders and clients, by all identified audiences, in the public and private participation process for major agency outreach efforts. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin CCRSI's public and private participation activities.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to participation from agency transit riders and clients.
- To provide general notification of meetings and forums for input from agency transit riders and clients, in a manner that is understandable to all populations served.
- To hold meetings for agency transit riders and clients in locations that are accessible to all area stakeholders, including but not limited to minority and low-income populations.
- To provide methods for two-way communication and information and input from agency transit riders and clients 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 the budget to accomplish the goals.
- Citizens of Cole County particularly those with developmental disabilities and their advocates and specifically those minority and low-income populations, including limited English proficient persons.
- Agency Transit riders and clients
- Local jurisdictions and other government stakeholders (city and county)
- Private businesses and organizations
- Partner agencies – Social Services Agencies, State Agencies such as the Department of Mental Health, and Regions Planning Commissions.

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. Notice

- a. Official notification of intent to provide opportunity for agency transit riders and clients to participate in engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Engagement Process/Outreach Efforts

CCRSI will develop a public participation plan that includes an outreach plan to engage minority and Limited English Proficient (LEP) populations, and to seek input, provide education, and highlight key components of the Title VI Plan. Elements of the Public Engagement Plan may include:

- a. Meetings
- b. Open houses
- c. Focus groups
- d. Surveys

Events listed above will be held at CCRSI's administrative office or at other prescheduled location that is easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Comments from Agency Riders or Clients

CCRSI will conduct a 30-day comment period to provide opportunities for feedback from our riders/clients commencing upon approval of this Plan by the Board of Directors. Staff responsible for client transportation will notify riders of this comment period.

- a. Comment periods are used to solicit comments around an agency service or system change.
- b. Comments from Agency Riders or Clients are accepted through the following various means:
 - i. Dedicated email address at *titlevi@ccrsi.org*.
 - ii. Regular mail at *1908 Boggs Creek Road, Jefferson City, Mo. 65101*.
 - iii. Phone calls to Executive Director at 573-634-4555.

4. Response to Input from Agency Riders or Clients

All comments from Agency riders or clients 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

CCRSI ensures all outreach strategies, communications and involvement efforts comply with Title VI. CCRSI's Public Engagement Plan for its riders and clientele proactively initiates the involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the involvement process. Aligned with the above referenced communication tactics, CCRSI provides the following:

- a. Public notices published in non-English publications that serve LEP populations (if needed).
- b. Title VI Non-Discrimination Notice to the Public posted within the following locations:
 - a. The agency's website
 - b. Public areas of the agency's office(s) such as CCRSI's bulletin boards
 - c. Within transit or paratransit vehicles
- 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.

2024 – 2026 Title VI Program Public Engagement Process

CCRSI 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.

CCRSI will provide briefings to the Board of Directors and Advisory Bodies.

CCRSI 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

Summary of 2021 – 2023 Public Outreach Efforts

- The public welcomed and encouraged to attend Board Meetings
- The scheduled Board meeting dates published on the CCRSI website at: www.ccrsi.org

CCRSI has undertaken the following public outreach efforts within the last three calendar years:

- a. Title VI non-discrimination notice on agency's website.
- b. Agency communication materials in languages other than English available (subject to Safe Harbor parameters).
- c. Services for Limited English Proficient persons were available & used as needed.

G. Language Assistance Plan

Cole County Residential Services, Inc., Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address CCRSI'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: Cole County, Missouri

CCRSI 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 CCRSI. 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, CCRSI 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: Cole County, Missouri

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 2022 5-Year American Community Survey data for Table C16001 for CCRSI’s service area consisting of Cole County Missouri, 95.86% of the total population five years of age and older of 69,527 speak only English. A total of 1.27% of the total population speak English “less than very well” – a definition of Limited English Proficiency.

Of the LEP Language group(s) that speak English “less than very well”, Spanish had the highest population at 0.38%, Chinese had the second highest population at 0.27%, and Other Asian & Pacific Island languages had the third highest population at 0.11%. 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.

LEP Population in CCRSI's Service Area

Language Spoken at Home for the Population 5 Years and Over

Source: 2022: 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	Cole County, Missouri	Not Applicable	Not Applicable	Service Area Total	Percentage of Total Population 5 Years and Older
Total Population 5 Years and Over	72,533			72,533	100.00%
Speak Only English	69,527			69,527	95.86%
Total Speak English "less than very well"	920	0	0	920	1.27%
Spanish	1368				
Speak English "less than very well"	274			274	0.38%
French, Haitian, or Cajun	117			117	
Speak English "less than very well"	28			28	0.04%
German or other West Germanic languages	113			113	
Speak English "less than very well"	33			33	0.05%
Russian, Polish, or other Slavic languages	77			77	
Speak English "less than very well"	29			29	0.04%
Other Indo-European languages	283			283	
Speak English "less than very well"	180			180	0.25%
Korean	8			8	
Speak English "less than very well"	8			8	0.01%
Chinese (incl. Mandarin, Cantonese)	244			244	
Speak English "less than very well"	196			196	0.27%
Vietnamese	144			144	
Speak English "less than very well"	54			54	0.07%
Tagalog (inc. Filipino)	0			0	
Speak English "less than very well"	0			0	0.00%
Other Asian & Pacific Island languages	417			417	
Speak English "less than very well"	81			81	0.11%
Arabic	25			25	
Speak English "less than very well"	22			22	0.03%
Other and unspecified languages	210			210	
Speak English "less than very well"	15			15	0.02%

2. Frequency of Contact by LEP Persons with CCRSI's Services:

The CCRSI staff reviewed the frequency with which office staff, drivers, and direct care staff have, or could have, contact with LEP persons. To date, CCRSI has had no requests or calls from LEP persons for an interpreter.

3. The importance of programs, activities or services provided by CCRSI to LEP persons:

Of the services, benefits, and activities offered by CCRSI, CCRSI has determined the most important are the outreach activities, summarized in CCRSI's Title VI Public Engagement Plan, which includes events such as public meetings and/or open houses and include specific outreach to LEP persons in order to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

4. The resources available to CCRSI to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. To the extent feasible, with advance notice, an interpreter can be arranged if needed for public hearings, Board of Directors' meetings and on phone lines. CCRSI has communication with these agencies in Missouri that are contacted as needed to assist LEP persons:

Mid-Missouri Region:

Centro Latino de Salud

609 N. Garth Avenue, Columbia, MO. 65201, (573) 449-9442

Provide services and guidance in navigating the health, education and cultural resources of mid-Missouri

Statewide:

Legal Aid of Western Missouri

4001 Dr. Martin Luther King, Jr. Blvd., Kansas City, MO. 64130, (816) 474-6750

Assist the Hispanic population throughout the state. Offices located in Kansas City, Warrensburg, St. Joseph and Joplin.

2. Language identification flashcards and/or "I speak" Cards
3. One-on-one assistance through outreach efforts and contracted agencies
4. Automated translation technology (such as Google Translate)

Based on our demographic analysis (Factor 1) CCRSI 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, CCRSI will evaluate its vital documents and provide translations.

CCRSI will provide assistance and direction to LEP persons upon request at CCRSI's expense.

Staff LEP Training

The following training will be provided to CCRSI staff:

1. Information on CCRSI 's Title VI Procedures and Title VI responsibilities pertaining to their specific duties.
2. Information on CCRSI's Language Assistance Plan and LEP Responsibilities.
3. Information on the written and oral language assistance services available (including "I Speak" cards), and instructions on how agency staff can access these products and services.
4. Information on how to respond to LEP assistance requests from LEP persons, and how to arrange providing language assistance services.
5. Documentation of language assistance requests by maintaining a Language Assistance Requests Log

CCRSI 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. CCRSI 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 an annual basis.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of CCRSI's Title VI Plan requirement.

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

H. Advisory Bodies

CCRSI does not have any non-elected committees and councils, the membership of which is selected by the recipient.

I. Subrecipient Assistance

CCRSI does not have any subrecipients.

J. Subrecipient Monitoring

CCRSI does not have any subrecipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when CCRSI 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.

CCRSI has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Due to the nature of our services, CCRSI does not have members of the public come to our facilities on a regular basis. CCRSI provides door-to-door service to our clients. We pick them up at their residence and return them to their residence.

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

CCRSI is not a transit provider that operates fixed route service, or transit provider that operates fifty (50) or more fixed route vehicles in peak service and are in an urbanized size area with a population of 200,000 or more.

Thus, the requirements to set system-wide service standards and policies, collect and report demographic data, monitor transit service, and to evaluate service and fare changes, are not applicable to CCRSI.

M.Attachments

Attachment 1: CCRSI's 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:

Nate Suttentfield, Executive Director
Cole County Residential Services, Inc.
1908 Boggs Creek Road
Jefferson City, MO 65101

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 CCRSI at 1908 Boggs Creek Road, Jefferson City, MO 65101, or at 573-634-4555.