

Pioneer Trails Regional Planning Commission

Title VI Program

Date filed with MoDOT Transit Section:

March 22, 2023

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A. Title VI Assurances

Pioneer Trails Regional Planning Commission (PTRPC) 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.

PTRPC 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. PTRPC 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.

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

B. Agency Information

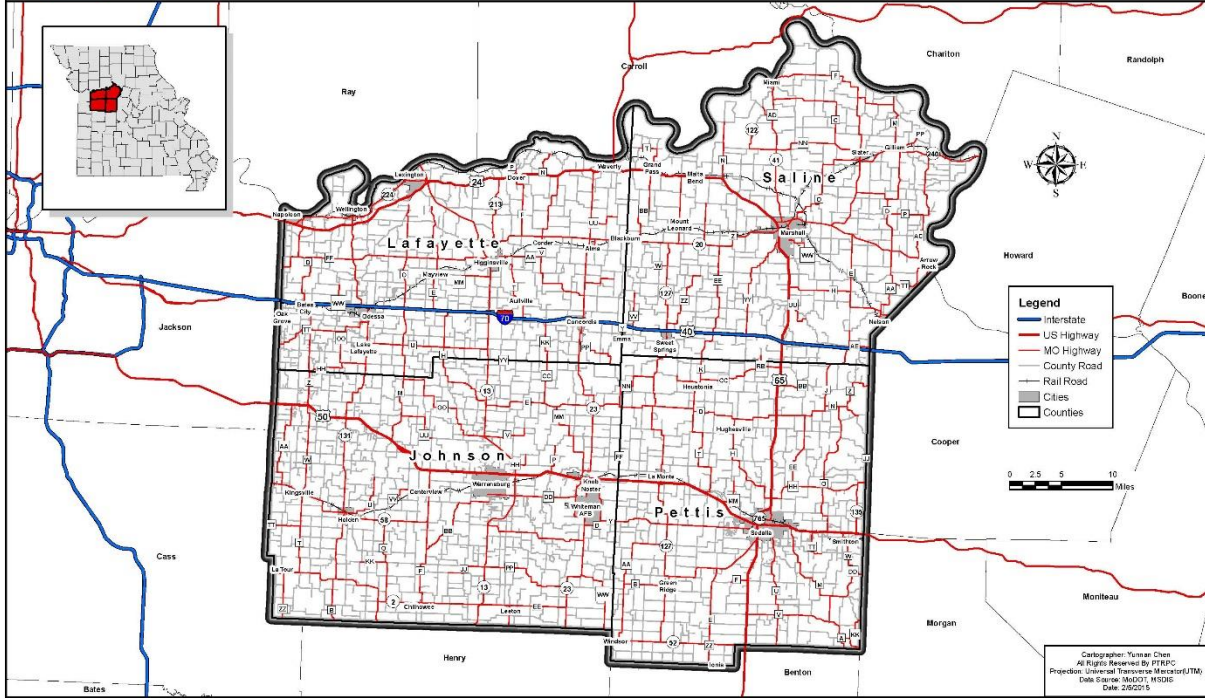
Since its inception, PTRPC has provided professional planning services and technical assistance to its members through community-based planning efforts, regional collaboration, cooperation, and coordination between the public and private sectors, and pursued economic development opportunities.

The Pioneer Trails Regional Planning Commission (PTRPC) was officially established under the Regional Planning and Community Development Act of 1966 as Show-Me Regional Planning Commission and was re-established as PTRPC in 2002. As one of nineteen regional planning commissions throughout the State of Missouri.

PTRPC serves Johnson, Pettis, Lafayette, and Saline counties with 151,998 [Source: 2020 US Census] residents. With an office location in Concordia, Missouri, centrally located in the region between Kansas City and Columbia, PTRPC provides technical planning expertise to the West-Central Missouri region. PTRPC is governed by a board of directors that is comprised of representatives from member counties and communities, the private sector and various other stakeholder organizations.

PTRPC works closely with federal and state agencies to carry out tasks at the regional and local level. PTRPC has several departments that deal with various planning aspects in the region including Region-A Homeland Security Oversight Committee, Transportation Planning, Economic Development and Planning, and Geographic Information System (GIS.)

Pioneer Trails Regional Planning Commission



C. Notice to the Public

Notifying the Public of Rights under Title VI

Pioneer Trails Regional Planning Commission posts Title VI notices on our agency's website, in public areas of our agency, and in our offices.

- Pioneer Trails Regional Planning Commission operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Pioneer Trails Regional Planning Commission (PTRPC).
- For more information on PTRPC's civil rights program, and the procedures to file a complaint, contact 660-463-7934, email Norm@trailsrpc.org or visit our office at 802 S Gordon St., Concordia, MO 64020. For more information visit www.trailsrpc.org
- In addition to the complaint process at PTRPC complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street, Suite 404, Kansas City, Missouri 64106; Phone: (816) 329-3920 • Fax: (816) 329-3921.
- If information is needed in another language call 660-463-7934.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of PTRPC'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 PTRPC 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 PTRPC Title VI Complaint Form at www.trailsrpc.org, or request a copy by writing to 802 S. Gordon St. Concordia MO, 64020. Information on how to file a Title VI complaint may also be obtained by calling Norm Lucas at 660-463-7934.

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 Pioneer Trails Regional Planning Commission, 802 S. Gordon St., Concordia MO, 64020.

COMPLAINT ACCEPTANCE: PTRPC will process complaints that are complete.

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

INVESTIGATIONS: PTRPC will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, PTRPC may contact the complainant. Unless a longer period is specified by PTRPC, the complainant will have ten (10) days from the date of the letter to send requested information to the PTRPC 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 PTRPC'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. PTRPC 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, PTRPC 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 Norman Lucas at Pioneer Trails Regional Planning Commission, 802 S Gordon St., Concordia MO, 64020, or at 660-463-7934.

**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 Pioneer Trails RPC’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

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

Pioneer Trails RPC’s staff are given Title VI training, and agency can answer affirmatively to all the following questions:

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

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

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

Identification of Stakeholders

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

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

Elements of the Public Engagement Plan

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

Elements of the Public Engagement Plan include:

1. Public Notice

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

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Public hearings
- d. Surveys
- e. 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 [660-463-7934]

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

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

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

G. Language Assistance Plan

PTRPC Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address PTRPC'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:

Pioneer Trails Regional Planning Commission is located in Concordia, Mo and serves Lafayette, Saline, Johnson, and Pettis Counties along with the counties individual jurisdiction and residents. The region is a total 2,925 sq. miles with a population of 152,165 according to the US Census Bureau.

PTRPC 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 PTRPC. 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, PTRPC 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 PTRPC service area are proficient in the English language. Based on 2020 Census data, 33.03% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

LEP Population in PTRPC Service Area					
Population 5 years and over by language spoken at home	Johnson County	Saline County	Pettis County	Lafayette County	Service Area Total
Population 5 Years and Over	50,551	21,536	39,986	30,898	142,971
English	48,339	19,676	35,419	30,046	133,480
Spanish	648	1,671	2,482	365	5,166
Speak English less than very well	21.3%	65.6%	50.0%	24.4%	40.3%
Other Indo-European	482	84	1,952	367	2,885
Speak English less than very well	31.9%	31.5%	39.0%	4.9%	26.8%
Asian and Pacific Island	765	105	107	109	1,086
Speak English less than very well	45.1%	75.3%	52.3%	18.3%	47.8%
All Other	254	0	26	11	291
Speak English less than very well	45.6%	0.0%	23.1%	0.0%	17.2%

Source: 2020 U.S. Census Bureau

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

The PTRPC staff reviewed the frequency with which office staff, or could have, contact with LEP persons. To date, PTRPC has, on average, have not had a request for an interpreter. PTRPC averages no phone calls per month. (Surveys can be found in attachment 3)

<p>LEP Staff Survey Form</p> <p>PTRPC is studying the language assistance needs of its region 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 people 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 individuals speak? 3. What languages (other than English) do you understand or speak? 4. Would you be willing to serve as a translator when needed?

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

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

Outreach activities, summarized in PTRPC'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.

<p>Outside Organization LEP Survey</p> <p>Organization: Pioneer Trails Regional Planning Commission</p> <ol style="list-style-type: none"> 1. What language assistance needs are encountered? 2. What languages are spoken by persons with language assistance needs? <p style="text-align: center; margin-top: 20px;">13</p>
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3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

5. The resources available to PTRPC and overall cost to provide LEP assistance:

LAMP Interpreters

Lmapinterpreters.org

- Interpreting foreign language over the Phone & Video services is \$.66 by the minute
- Interpreting sign language over Video services is \$1.15 by the minute (30 minutes minimum)
- For translation services it all depends of the document ... by the page (\$50.00) or word count (.14 c per word)

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.

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

PTRPC will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to PTRPC staff:

1. Information on PTRPC 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 PTRPC's Title VI Plan requirement.

PTRPC will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the PTRPC 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 PTRPC's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether PTRPC has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning PTRPC's failure to meet the needs of LEP individual.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American	Total
PTRPC Board of Directors	88.24%	5.88%	5.88%	0%	100%
Transportation Advisory Council	93.75%	6.25%	0%	0%	100%
Community Economic Development Committee	100%	0%	0%	0%	100%
Regional Homeland Security Oversight Committee	100%	0%	0%	0%	100%

Description of efforts made to encourage minority participation on committees:

- **Meetings are advertised and are open to the public.**
- **Members are appointed by County Commissioners and Jurisdiction leadership.**

I. Subrecipient Assistance

PTRPC does not have any subrecipients.

J. Subrecipient Monitoring

PTRPC does not have any subrecipients.

K. Equity Analysis of Facilities

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

Attachment 2

**Pioneer Trails Regional Planning Commission
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:

Norman Lucas
Pioneer Trails Regional Planning Commission
802 S. Gordon St.
Concordia MO, 64020
Norm@trailsrpc.org
660-463-7934

PLEASE PRINT

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

continued
TITLE VI COMPLAINT FORM – PAGE 2

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

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

Signature and date is required:

Signature

Date

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

Signature

Date

Attachment 3

Title VI Self-Survey Form

Date filed with MoDOT Transit Section:

March 22, 2023

DATE

Survey Date: March 20, 2023

Period Covered: 7/22/2020-3/22/2023

Name of Agency: Pioneer Trails RPC

A. Summary of Complaints:

No complaints received to date.

B. Number of complaints for the period:

0

C. Number of complaints voluntarily resolved:

0

D. Number complaints currently unresolved:

0

E. Attach a summary of any type of complaint and provide:

- *No complaints have been received.*

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.

Staff were encouraged to review documents for corrections, and take surveys regarding individual experiences with the LEP community.

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

Title VI documents have been printed and modified for easier distribution.

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

No problems encountered.

Signature: Christopher Hess

Title: Principal Planner

Date: March 22, 2023

Attachment 4

2023 Title VI Program Assessment

Title VI Program Assessment				
Agency Name:	<u>Pioneer Trails Regional Planning Commission</u>			
Address:	<u>802 S. Gordon Concordia, MO 64020</u>			
Contact:	<u>Christopher Hess</u>			
Phone:	<u>(660)463-7934</u>			
Email:	<u>Chris@trailsrcp.org</u>			
Subrecipient category:	<u>Regional Planning Commission (RPC)</u>			
Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
1. General Requirements				
a. Adoption of policy by governing Board	ND	No deficiency	Updated and adopted every 3 years	April 2023
b. Public notice requirements				
(1) a statement that the agency operates programs without regard to race, color, and national origin;	ND	No deficiency	On display on all relevant paperwork, emails, and in main office area provided on website.	
(2) a description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations; and	ND	No deficiency	On display in main office area and website.	
(3) a description of the procedures that members of the public should follow in order to file a discrimination complaint against the grantee or subrecipient (should be published in each language for which the grantee has determined there is an LEP population).	ND	No deficiency	On display in main office area and website.	
c. Complaint Procedures				
(1) procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request	ND	No deficiency	Available in main office area and on website.	

(2) complaint procedures and form should be posted on agency website	ND	No deficiency	Available in main office area and on website.	
d. List of Title VI related complaints/investigations	ND	No deficiency	Available in the main office area and on website. No complaints, investigations or lawsuits have occurred.	
(1) prepare and maintain a list of any Title VI related active investigations conducted by entities other than FTA, lawsuits, or complaints				
Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
(2) the list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint	ND	No deficiency	Available in the main office area and on website. No complaints, investigations or lawsuits have occurred.	
e. Public Participation and Outreach Plan	ND	No deficiency	Public input is obtained through various means, for example the Transportation Advisory Committee (TAC), hard copy and electronic surveys, PTRPC Board of Directors, Community Economic Development Committee, Regional Safety Coalition.	
(1) public participation plan to consider the viewpoints of minority, low-income, and LEP populations that offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions				
f. Language Assistance Plan for LEP persons	ND	No deficiency	LEP population low in regional. Efforts to translate are made if requested. Title VI pamphlet provided in English and Spanish.	
(1) take steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP)				
(2) conduct a four factor analysis and develop a language assistance plan	ND	No deficiency	Analysis complete	
g. Planning Board, Advisory Council/Committee racial breakdown	ND	No deficiency	Racial breakdown provided in plan.	
(1) recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees				
h. Subrecipient monitoring				

(1) narrative description of how agency monitors subrecipients for compliance with the regulations	NA	Not applicable	No subrecipients.	
h. Equity Analysis for construction projects				
(1) if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility	ND	No deficiency	RPC has not constructed any facilities.	

Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
2. Requirements of Fixed-Route Transit Services				
a. System-wide standards and policies (for each mode)				
(1) quantitative service standards necessary to guard against discriminatory service design or operations decisions	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
· Vehicle load factor				
· Headways				
· On-time performance				
· Service availability				
(2) service policies necessary to guard against discriminatory service design or	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
· Distribution of amenities				
· Vehicle assignment				
b. Data collection and reporting requirements				
(1) prepare demographic and service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	

(2) collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(3) develop a demographic profiles comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(4) collect data on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(5) demographic information shall be displayed in tabular format	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
c. Monitoring transit services				
(1) use the minority transit route definition (i.e., at least one-third of the revenue miles are located in a minority Census block, Census block group, or traffic analysis zone) to implement this monitoring program. Transit providers shall select a sample of minority and nonminority routes from all modes of service provided	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(2) assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(3) compare the transit service observed in the assessment to the transit provider's established service policies and standards	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(4) For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, the transit provider shall analyze why the discrepancies exist, and take steps to reduce the potential effects	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(5) evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	

(6) develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(7) brief and obtain approval from the transit providers' policymaking officials, generally the board of directors or appropriate governing entity responsible for policy decisions regarding the results of the monitoring program	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(8) submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official(s)'s consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI Program	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
d. Evaluate service and fare equity changes (when applicable); Service equity for "major" service changes and all fare changes	NA	Not applicable		
e. Service Equity Analysis shall:	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(1) identify what constitutes a "major service change subject to a service equity analysis;				
(2) define and analyze adverse effects;				
(3) policy for measuring disparate impacts for minority populations and disproportionate burden for low income populations;				
(4) engage the public in the decision-making process;				
(5) describe the dataset(s) the transit provider will use in the service equity analysis; and				
(6) evaluate the impacts of proposed service changes on minority and low-income populations.				
(f) Fare Equity Analysis shall:				
(1) analyze any available information generated from ridership surveys;				
(2) determine the number and percent of users of each fare media being changed;				

(3) review fares before the change and after the change;	NA	Not applicable	RPC does not provide Fixed-Route Transit services.	
(4) compare the differences for each particular fare media between minority users and overall users; and				
(5) develop a policy for measuring disparate impact and disproportionate burden;				
(6) engage the public in the decision-making process; and				
(7) evaluate the effects of all fare changes on Title VI protected populations and low-income populations.				
3. Requirements for MPOs				
(a) All general requirements as described in Section 1 of this document	NA			
(b) Demographic profile of metropolitan area	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).	
(1) Identification of locations of minority populations in the aggregate				
(c) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).	
Title VI/EJ Requirement	Findings	Deficiency	Corrective Action/Comment	Due Date
(d) Demographic maps	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).	
(1) overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level				
(2) Charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes				
(e) An analysis of impacts identified from above maps	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).	
(1) Identification of any disparate impacts on the basis of race, color, or national origin				
(2) Determination of whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts				
(3) Policy alternatives that could be employed that would have a less discriminatory impact				

(f) Planning activities			
(1) Title VI compliance reporting for planning activities	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).
(2) MPO self certification of compliance	NA	Not applicable	Pioneer Trails is classified as a Regional Planning Commission (RPC) and not an Metropolitan Planning Organization (MPO).

Attachment 5
2023 Staff Survey Results

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

- How often do you come into contact with persons who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

- What languages do these individuals speak? Spanish
- What languages (other than English) do you understand or speak? None
- Would you be willing to serve as a translator when needed? no

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	<u>none</u>
Weekly	<u>none</u>
Monthly	<u>none</u>
Less frequently than monthly	<u>none</u>

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC'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.

Susan Flandermeier
Printed Name

Susan Flandermeier 3/20/23
Signature Date

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

1. How often do you come into contact with persons 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 individuals speak? N/A
3. What languages (other than English) do you understand or speak? N/A
4. Would you be willing to serve as a translator when needed? No

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	none
Weekly	none
Monthly	none
Less frequently than monthly	none

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC'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.

Debra Brackman
Printed Name

Debra Brackman
Signature

3/20/23
Date

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

1. How often do you come into contact with persons who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

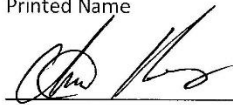
2. What languages do these individuals speak? Spanish
3. What languages (other than English) do you understand or speak? slight Spanish
4. Would you be willing to serve as a translator when needed? no

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	<u>none</u>
Weekly	<u>none</u>
Monthly	<u>rare</u>
Less frequently than monthly	<u>rare</u>

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC'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.

Christopher Hess
Printed Name


Signature

3/20/23
Date

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

1. How often do you come into contact with persons 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 individuals speak? N/A
3. What languages (other than English) do you understand or speak? N/A
4. Would you be willing to serve as a translator when needed? N/A

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	<i>none</i>
Weekly	<i>none</i>
Monthly	<i>none</i>
Less frequently than monthly	<i>none</i>

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC’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.

Janet Luedjen
Printed Name

Janet Luedjen
Signature

3-20-23
Date

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

1. How often do you come into contact with persons 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 individuals speak? N/A
3. What languages (other than English) do you understand or speak? Spanish, German
4. Would you be willing to serve as a translator when needed? possibly

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	<u>none</u>
Weekly	<u>none</u>
Monthly	<u>none</u>
Less frequently than monthly	<u>N/A none</u>

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC’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.

Norman Lucas
Printed Name

Norman Lucas
Signature

3/20/23
Date

Limited English Proficiency (LEP) Staff Survey Form

PTRPC is studying the language assistance needs of its organizations so that we can better communicate with them if needed.

- How often do you come into contact with persons who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

- What languages do these individuals speak? Spanish
- What languages (other than English) do you understand or speak? None
- Would you be willing to serve as a translator when needed? N/A

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	<u>Spanish</u>

The importance of programs, activities or services provided by PTRPC to LEP persons:

Outreach activities, summarized in PTRPC'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.

Nathan Cooky
Printed Name

Nathan Cooky
Signature

3/22/23
Date