

**City of Mount Vernon Transportation Department
Civil Rights Title VI Plan
2014-2017**

Adopted by City of Mount Vernon
Board of Alderman:
March 11, 2014
DATE
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Date filed with MoDOT Transit Section:

July 20, 2016

Date Approved by MoDot Transit Section

DATE

City of Mount Vernon Transportation Department

Title VI Plan

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City of Mount Vernon Transportation Department

A. Title VI Assurances

City of Mount Vernon Transportation Department 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.

City of Mount Vernon Transportation Department 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. City of Mount Vernon Transportation Department 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.

City of Mount Vernon Transportation Department meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including City of Mount Vernon Transportation Department 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).

City of Mount Vernon Transportation Department receives federal funds through grants administered by the Missouri Department of Transportation for both operating and capital. As a 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

B. Agency Information

1. Mission Statement:

The mission of City of Mount Vernon Transportation Department is to provide reliable transportation for transportation disadvantaged Citizens of Mount Vernon so they can live independently in their own communities.

2. History:

In 1986 the mayor saw a need for transportation services for the senior citizens to and from the senior center, store, and doctor appointments. When records started being kept in 1992 we hauled 1182 with one driver, around 2004 the city administrator applied for the MoDot grant and from there we have grown to a handicap accessible 11 passenger minibus and a handicap accessible 5 passenger minivan. We have 1 full time driver and 2 part time drivers and in 2015 our ridership count was 16,181.

3. Profile

City of Mount Vernon Transportation Departments provides transportation service at a minimal cost to city residents to/from medical appointments, pharmacies, shopping, work and various other trips to meet their daily needs. According to 2015 US Census we have a population of 4,505.

4. Population served

The population that the city serves is a mix of senior citizens, individuals with disabilities and low-income population; we have a small percentage that uses transportation to work. City of Mount Vernon Transportation Department is available to all persons regardless of race, gender, color, religion, age, national origin, disability and/or Vietnam era or other veterans.

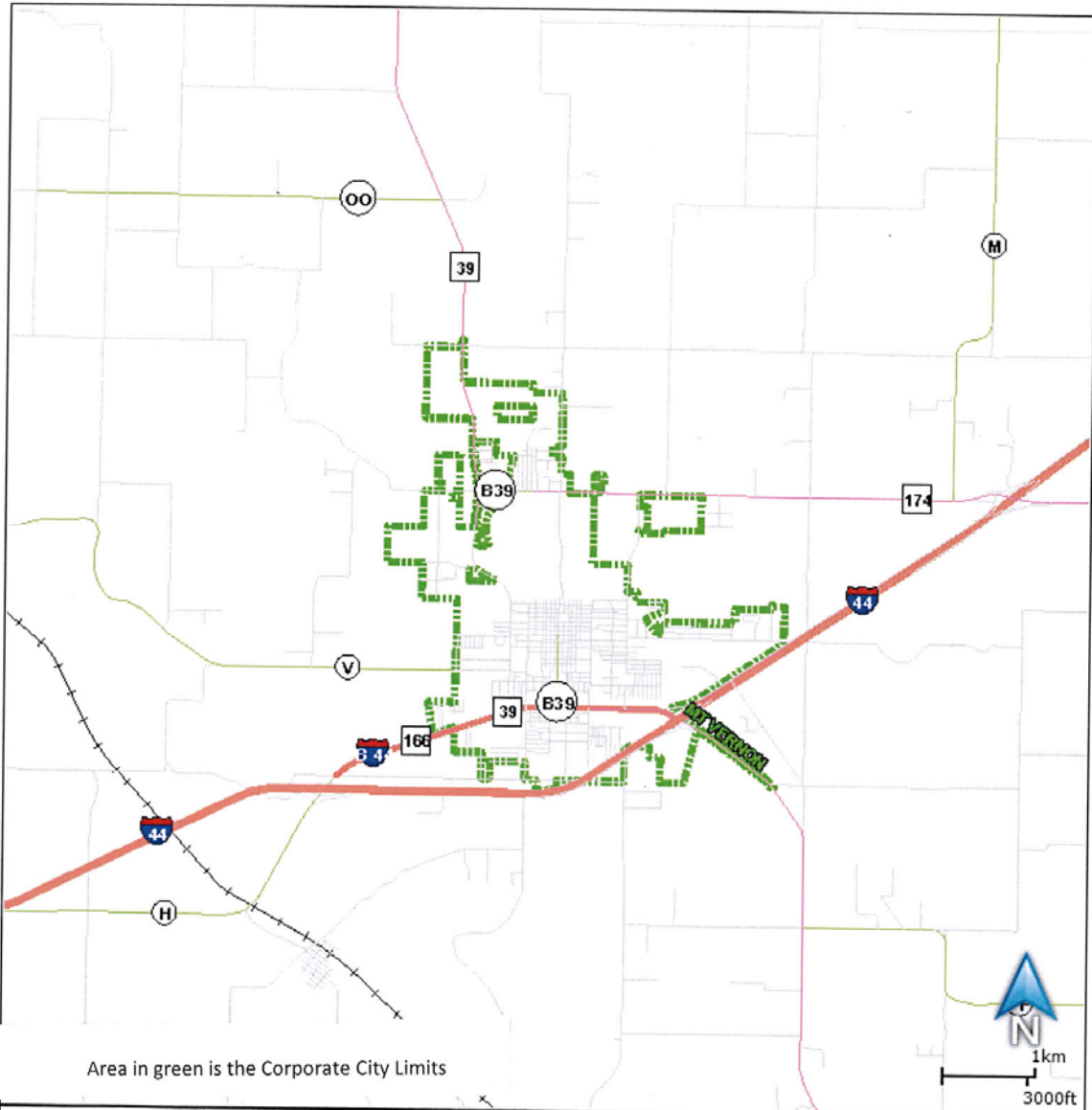
5. Service area

The service area is any area within the corporate city limits of Mount Vernon, which is 3.7 miles.

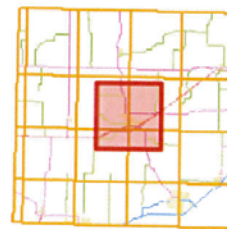
6. Governing body make-up

The City of Mount Vernon Transportation Department is governed by a Mayor and council of 8, 2 per ward with the city divided into four wards. The Mayor and Council serve for 2 year term with four council members elected every year. Currently the council is made up of 3 women, 6 men with 3 of which are senior citizen and all are Caucasian. All City of Mount Vernon Board of Alderman meetings are open to the public.

Lawrence County, MO



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C. Notice to the Public

Notifying the Public of Rights under Title VI

City of Mount Vernon Transportation Department posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our vehicles.

City of Mount Vernon Transportation Department 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.

If you believe you have been discriminated against on the basis of race, color, or national origin by City of Mount Vernon Transportation Department, 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 City of Mount Vernon Transportation.

Phone: 417-466-2122

Email: mspringer@mtvernon-cityhall.org
sweldy@mtvernon-cityhall.org

How to file a Title VI complaint with City of Mount Vernon Transportation Department:

1. A Complaint Form is available on our website at www.mtvernon-cityhall.org, and available at City Hall, or calling City Hall (417-466-2122) and requesting a copy by mail.
2. In addition to the complaint process at City of Mount Vernon Transportation Department, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust St, Suite 404, Kansas City, Mo 64106 or telephone 816-329-3920.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information. If information is needed in another language, contact City Hall 417-466-2122.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department Title VI Complaint Form at www.mtvernon-cityhall.org or request a copy by writing to City of Mount Vernon Transportation Department, Attn: Transportation Coordinator, PO Box 70, Mount Vernon, MO 65712. Information on how to file a Title VI complaint may also be obtained by calling City of Mount Vernon at 417-466-2122

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 Transportation Coordinator, PO Box 70, Mount Vernon, MO 65712

COMPLAINT ACCEPTANCE: City of Mount Vernon Transportation Department will process complaints that are complete.

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

INVESTIGATIONS: City of Mount Vernon Transportation Department will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information

is needed to resolve the case, City of Mount Vernon Transportation Department may contact the complainant. Unless a longer period is specified by City of Mount Vernon Transportation Department, the complainant will have ten (10) days from the date of the letter to send requested information to the City of Mount Vernon Transportation Department investigator (City Administrator) 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 City of Mount Vernon Transportation Department'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. City of Mount Vernon's Board of Alderman 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, City of Mount Vernon Board of Alderman will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly to the following: Missouri Department of Transportation, 105 W. Capitol Ave., Jefferson City, MO 65102, telephone 1-888-ASK-MODOT or on the web at www.modot.mo.gov. Federal Transit Administration, 901 Locust Ste. 404, Kansas City, MO 64106, telephone 816-329-3910 or on the web at www.fta.dot.gov.

If information is needed in another language, contact City of Mount Vernon Transportation Department at PO Box 70, Mount Vernon, MO 65712, or at 417-466-2122.

E. Monitoring Title VI Complaints, Investigations, Lawsuits

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in City of Mount Vernon Transportation Department Transportation’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

Agency Title VI Complaint Log								
Investigations, Lawsuits or Complaints Naming City of Mount Vernon Transportation Alleged Discrimination On the Basis of race, Color or National Origin								
Date	Date of	Basis of Allegation		Pending Status	Action Taken by City of Mount Vernon	Closure	Letter of	Date of
Complaint Filed	Complaint	(Race, Color, Nat'l Origin)	Brief Summary	Active/Inactive		Letter	Finding	CL OR LOF

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 Alderman– 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 department’s mission, establishes goals, and approves the budget to accomplish the goals.
- Transportation riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers

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.

All meetings are open to the public with dates, locations and meeting information published in the local newspaper. We hold a public hearing in the fall for the City of Mount Vernon Transportation Department on the budget and ask for any input from the citizens of Mount Vernon. We publish and post the public hearing 30 days and again 7 days prior to the public hearing.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Rider outreach
 - i. Ad in paper twice a year on senior page
 - ii. Information booth at Business Expo
- 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 are held at City Hall, Library and at the MARC, 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 department services or system change.
- b. Comments are accepted through various means:
 - i. Email address.
 - ii. Facebook.
 - iii. Regular mail.
 - iv. Information booth at Business Expo

- v. In person at public hearing.
- vi. Phone calls to City Hall 417-466-2122

4. Response to Public Input

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

Title VI Outreach Best Practices

City of Mount Vernon Transportation Department ensures all outreach strategies, communications and public involvement efforts comply with Title VI. City of Mount Vernon Transportation Department'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, City of Mount Vernon Transportation Department 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.

2014 – 2017 Title VI Program Public Engagement Process

City of Mount Vernon Transportation Department will conduct a Public Engagement Process for the 2014-2017 Title VI Program. This process will include outreach to seek input, provide education, and highlight key components of the Title VI Plan.

City of Mount Vernon Transportation Department will provide briefings to the Board of Directors.

City of Mount Vernon Transportation Department will conduct a 30 day public comment period to provide opportunities for feedback on the 2014-2017 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person

Summary of 2011-2013 Public Outreach Efforts

Each October, Public Hearings are held at City of Mount Vernon Council Chambers to notify the public of the use of federal funding for Capital purchases. These notices are placed in the local newspaper to invite the public to attend. This process is required by the Federal Transit Administration when federal funding is used to make capital purchases.

G. Language Assistance Plan

City of Mount Vernon Transportation Department Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address City of Mount Vernon Transportation Department'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:

See service area map on Page 3; City of Mount Vernon Transportation Department transports within the corporate city limits of Mount Vernon.

City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department. 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, City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department service area are proficient in the English language. Based on 2010 Census data, 2% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

LEP Population in City of Mount Vernon Transportation Department Service Area

	Mount Vernon, MO	%
English	4,361	95.3%
Spanish	98	0.51%
Other Indo-European Languages	17	0.09%
Asian and Pacific Islander Languages	22	0.12%
Other	27	0.14%

2. Frequency of Contact by LEP Persons with City of Mount Vernon Transportation Department’s Services:

The City of Mount Vernon Transportation Department staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, City of Mount Vernon Transportation Department has not received any request for an interpreter and the transportation dispatch has not received any call requiring LEP Assistance.

LEP Staff Survey Form

LEP Staff Survey Form is used by the Mount Vernon Transportation Department to understand the language assistance needs of our ridership and to improve our efforts to better communicate with those needing that assistance

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? (Please circle one of the following)
 DAILY WEEKLY MONTHLY LESS THAN MONTHLY
2. What languages do these passengers speak? (Please circle one of the following)
 Spanish Asian Chinese Native American Other
3. Can you communicate with someone with Limited English Proficiency?(Please circle one of the following)
 Yes No
4. What steps would you take to assist someone that does not speak English Proficiently?

5. As a driver, what can we do to assist you with individuals with Limited English Proficiency?
3. The importance of programs, activities or services provided by City of Mount Vernon Transportation Department to LEP persons:

Outreach activities, summarized in City of Mount Vernon Transportation Department's Title VI Public Engagement Plan, include events such as public meetings that are held at City Hall, library, and the MARC, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population.

Outside Organization LEP Survey

Organization: City of Mount Vernon Transportation Department

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 City of Mount Vernon Transportation Department and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language identification flashcards.
2. Written translations of vital documents (identified via safe harbor provision)
3. One-on-one assistance through outreach efforts.
4. Website information.
5. To the extent feasible, arrange interpreter if needed for public hearings and Board of Alderman meetings.

As applicable: Based on our demographic analysis (Factor 1) City of Mount Vernon Transportation Department has determined that no language group(s) within our service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

City of Mount Vernon Transportation Department will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to City of Mount Vernon Transportation Department staff:

1. Information on City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department's Title VI Plan requirement.

City of Mount Vernon Transportation Department 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 City of Mount Vernon Transportation Department service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Review the current LEP population in the service area with the US Census information and the American Community Survey.
3. Review 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. Review whether the City of Mount Vernon Transportation Department's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether City of Mount Vernon Transportation Department has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning City of Mount Vernon Transportation Department's failure to meet the needs of LEP individual.

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

H. Advisory Bodies

Not Applicable

I. Sub recipient Assistance

Sub recipient Assistance

City of Mount Vernon Transportation Department does not have any sub recipients.

J. Sub recipient Monitoring

Sub recipient monitoring

Not Applicable

K. Equity Analysis of Facilities

Not Applicable

L. System-Wide Service Standards and Policies*

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

City of Mount Vernon does not operate any fixed route systems.