

Boonslick Regional Planning Commission

Title VI Program

Prepared: May 2025

Date Adopted by BRPC Board:

Date: TBD

Date filed with MoDOT Transit Section:

TBD

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

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

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Template revision date: November 2023

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A. Title VI Assurances

Boonslick Regional Planning Commission (BRPC) 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.

BRPC 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. BRPC 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.

BRPC meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including BRPC and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Signed: _____

Title: _____

Date: _____

B. Agency Information

1. Mission of Boonslick Regional Planning Commission

To improve the quality of life in the Boonslick Region through community, economic and workforce development initiatives; conserving and protecting natural resources; protecting the citizens through emergency planning and preparedness activities; promoting efficiency in governmental programs through sound planning practices; and promoting collaborative approaches to regional challenges.

2. History (including year started)

On May 27, 1968, Governor Warren E. Hearnes signed the necessary documents creating the Boonslick Regional Planning Commission (BRPC). The primary focus of the organization upon its inception has been to provide professional planning services and technical assistance to members within the region.

Boonslick is comprised of local units of government within the region. Membership is on a voluntary basis, and members are assessed a membership fee based upon the population of the community. In addition to the money generated by the local membership fees, the State of Missouri provides a grant (the amount varies annually) to each Regional Planning Commission for offsetting the costs of providing assistance to the region. The balance of the operating budget is generated through fees the office collects for administering various State and Federal programs.

3. Regional Profile (regional population; growth projection)

The Boonslick Region is centered on Interstate 70 and lies immediately west of the St. Louis metropolitan area. Neighboring jurisdictions are Audrain and Pike counties on the north, Audrain and Callaway counties on the west, St. Charles County on the southeast, the Mississippi River to the northeast and the Missouri River on the south.

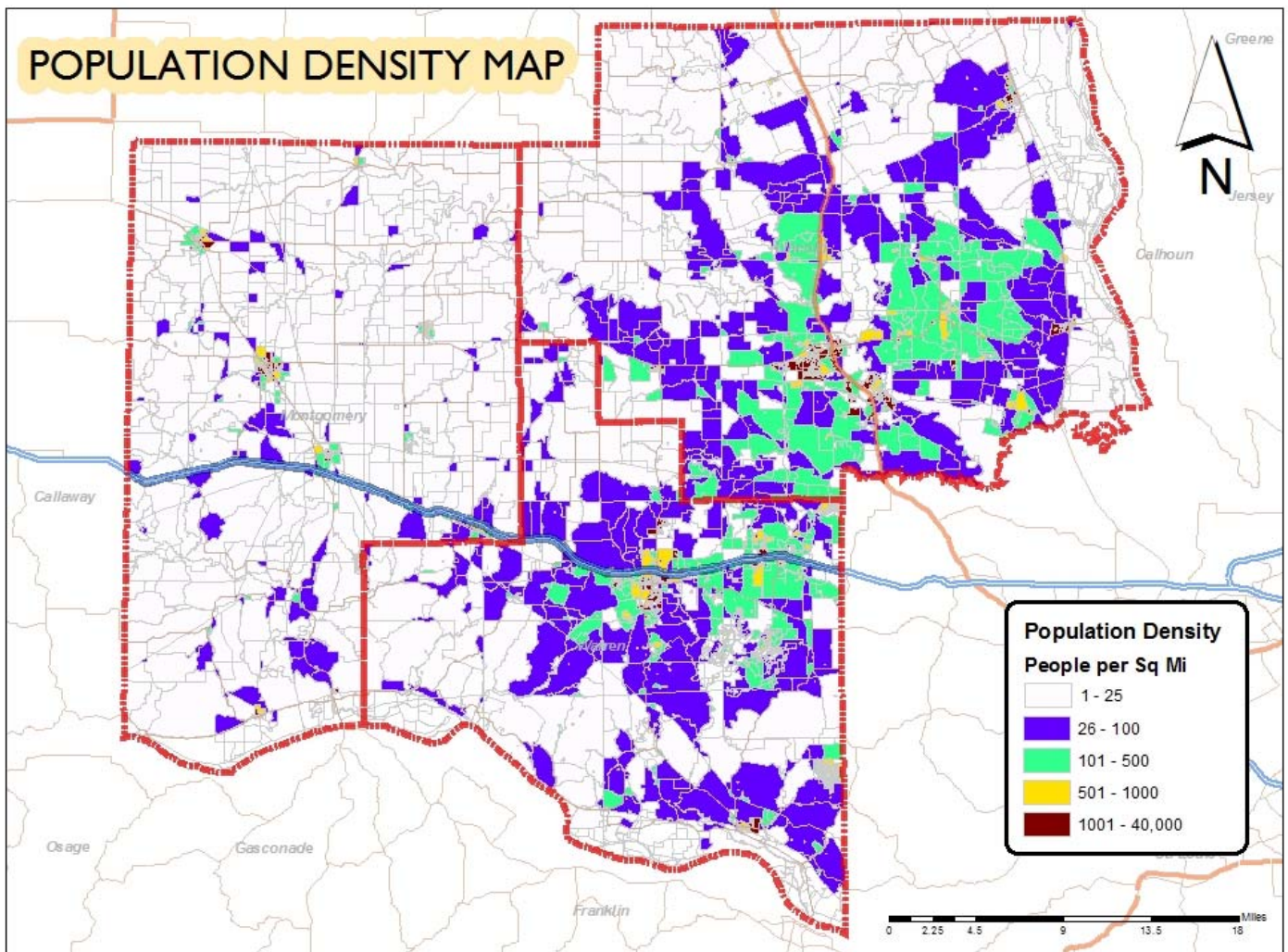
The area encompasses 1,645 square miles, 27 municipal governments and 3 county governments. Lincoln County covers 630 square miles and has 12 municipalities: Chain of Rocks, Elsberry, Foley, Fountain N Lakes, Hawk Point, Moscow Mills, Old Monroe, Silex, Troy, Truxton, Whiteside, and Winfield. Troy serves as Lincoln County's county seat. Montgomery County consists of 584 square miles and 9 cities: Bellflower, High Hill, Jonesburg, Middletown, Montgomery City, McKittrick, New Florence, Rhineland and Wellsville. Montgomery City is the county seat of Montgomery County. The remaining 6 incorporated communities are in Warren County. These cities include Innsbrook, Pendleton, Marthasville, Truesdale, Warrenton, and Wright City. Warrenton serves as the county seat. Warren County is the smallest county in the Boonslick Region consisting of 432 square miles.

4. Population served (in relation to regional population)

The Boonslick Region is made up of three counties (Lincoln, Montgomery and Warren) and 27 cities with a total population of 106,428 people according to the 2020 Census. The population by county is as followed:

- Lincoln: 59,574
- Montgomery: 11,322
- Warren: 35,532

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



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

BRPC is governed by a board of directors comprised of a representative from each member city, three representatives from each member county, and one at-large member from each county. The Board of Directors' primary responsibility is to set policies for the operation of the Commission and the development of the region. Board of directors' meetings are held quarterly.

The Executive Committee, made up of six members from the Board of Directors, is responsible for the oversight of the director and the commission. The executive committee meets bi-monthly to discuss the progress and activities of the commission.

The portion of the BRPC bylaws that covers the governing board is attached in the appendixes.

Notifying the Public or Rights Under Title VI

BOONSLICK REGIONAL PLANNING COMMISSION

- Boonslick Regional Planning Commission posts Title VI notices on our website www.boonslick.org , www.morides.org, and in public areas of our agency.
- Boonslick 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 of 1964.
- To obtain additional information on BRPC's Title VI program, and / or the procedures to file a complaint, contact Kim Meyer at 636-456-3473, email kmeyer@boonslick.org or visit our office at 111 Steinhagen, Warrenton, MO 63383. For more information visit morides.org
- Any person who believes they have been discriminated against on the basis of race, color, or national origin by MORides, you may file a Title VI complaint by completing, signing and submitting the agency's Title VI Complaint Form.
- In addition to the complaint process at BRPC 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.
- If information is needed in another language call 636-456-3473.

How to file a Title VI/ADA complaint with Boonslick Regional Planning Commission:

1. A copy of the Complaint Form and the Complaint Procedures be obtained by downloading the documents from **Boonslick Regional Planning Commission** 's website at www.boonslick.org and/or by requesting a copy from the Title VI Contact Kim Meyer, Fiscal Officer at 636-456-3473 or kmeyer@boonslick.org
2. In addition to the complaint process at Boonslick Regional Planning Commission, 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 Kim Meyer at 111 Steinhagen Rd, Warrenton, MO, or at 636-456-3473.

This Notice is posted on www.boonslick.org and in public areas of our agency.

D. Procedure for Filing a Title VI / ADA Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of BRPC'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 BRPC 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 BRPC Title VI Complaint Form at www.boonslick.org, or request a copy by writing 111 Steinhagen Road, Warrenton, MO 63383. Information on how to file a Title VI complaint may also be obtained by calling Kim Meyer, Fiscal Officer at (636) 456-3473.

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 111 Steinhagen Road, Warrenton, MO 63383.

COMPLAINT ACCEPTANCE: BRPC will process complaints that are complete.

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

INVESTIGATIONS: BRPC will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, BRPC may contact the complainant. Unless a longer period is specified by BRPC, the complainant will have ten (10) days from the date of the letter to send requested information to the BRPC 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 BRPC'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. BRPC 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, BRPC 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, Office of Civil Rights, East Building, 5th Floor- TCR 1200 New Jersey Ave, SE Washington, DC 20590.
- BRPC 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 email at TitleVI@modot.mo.gov.

If information is needed in another language, contact Kim Meyer, Fiscal Officer at (636) 456-3473.

Over 240 languages 24/7/365

Point to your language

Amharic አማርኛ	Hebrew עברית	Portuguese Português
Arabic العربية	Hindi हिन्दी	Punjabi ਪੰਜਾਬੀ
Bosnian (Serbo Croatian) Bosanski	Hmong Hmoob	Romanian Română
Burmese မြန်မာစာ	Italian Italiano	Russian Русский
Cambodian ខ្មែរ	Japanese 日本語	Somali Soomaali
Cantonese 廣東話	Karen ကညီ	Spanish Español
Haitian Creole Kreyòl Ayisyen	Kirundi Ikirundi	Swahili Kiswahili
Farsi فارسی	Korean 한국어	Tagalog Tagalog
French Français	Laotian ພາສາລາວ	Thai ภาษาไทย
French-Canadian français canadien	Mandarin 國語	Tigrinya ትግርኛ
German Deutsch	Nepali नेपाली	Urdu اردو
Turkish Türkçe	Polish Polski	Vietnamese Tiếng Việt

 twitter.com/CTSlanguagelink
 facebook.com/ctslanguagelink
 Find us online: [ctslanguagelink](https://ctslanguagelink.com)
 Telephone: 1.800.208.2620

CTS
language link
We speak your customer's language

**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 BRPC'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, Boonslick Regional Planning Commission had 0 Title VI Complaints.

Agency Title VI Complaint Log

<u>Date Complaint Filed</u>	<u>Complainant</u>	<u>Basis of Complaint (R-C-NO)</u>	<u>Summary of Allegation(s)</u>	<u>Pending Status of Complaint</u>	<u>Actions Taken</u>	<u>Closure Letter (CL)</u>	<u>Letter of Finding (LOF)</u>	<u>Date of CL or LOF</u>

Documenting Evidence of Agency Staff Title VI Training

BRPC'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?

The following Title VI training will be provided to BRPC staff:

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

BRPC 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. BRPC 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 an annual basis.

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

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin Boonslick Regional Planning Commission's public participation activities.

Objectives

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

Identification of Stakeholders

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

- 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 clients who call MO RIDES for ride referrals
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

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

Elements of the Public Engagement Plan include:

1. Public Notice

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

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address at kmeyer@boonslick.org
 - ii. Website at Boonslick.org
 - iii. Regular mail at 111 Steinhagen Rd Warrenton, MO 63383
 - iv. Forms using survey tool for compilation. - NA
 - v. Videotaping. - NA
 - vi. Phone calls to Customer Service Center at 636-456-3473.

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

BRPC ensures all outreach strategies, communications and public involvement efforts comply with Title VI. BRPC'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, BRPC provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website; www.Boonslick.org
- 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.

2025 - 2028 Title VI Program Public Engagement Process

BRPC conducted a Public Engagement Process for the 2025 - 2028 Title VI Program. This process included 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.

BRPC will provide briefings to the Board of Directors and Advisory Bodies on a regular basis.

BRPC conducted a 30 day public comment period to provide opportunities for feedback on the 2025-2028 Title VI Program.

Comments were accepted during the public outreach period via:

- a. Email NONE RECEIVED
- b. Mail NONE RECEIVED
- c. Phone NONE RECEIVED
- d. In person ON TBD
- e. Survey tool (agency option) NONE RECEIVED

Three-Year Summary of Public Outreach Efforts

Boonslick Regional Planning Commission has undertaken the following public outreach efforts within the last three calendar years:

- Sept 2023 - Warrenton Fall Festival Warrenton, MO
- Oct 2023 - Community Health & Wellness Fair Warrenton, MO
- Nov 2023 - Reach Church Resource Fair Montgomery City, MO
- Dec 2023 – Boonslick Regional Planning Annual Meeting Region Wide
- Oct 2024 - Warren County Senior Fair Wright City, MO
- Dec 2024 – Boonslick Regional Planning Annual Meeting Region Wide
- June 2025 - Professional Business Women of Lincoln County Senior Fair Troy, MO

G. Language Assistance Plan

BRPC Limited English Proficiency Plan

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

Lincoln, Montgomery and Warren Counties.

BRPC 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 BRPC. 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, BRPC undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

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

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

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

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

Based on the 2023 5-Year American Community Survey data for Table C16001 for Boonslick Regional Plannings Commission’s service area consisting of Lincoln County, Montgomery County and Warren County 99,973 persons or 97.36% of the total population five years of age and older of 102,680 speak only English. A total of 1.02% or 1,050 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 Language* had the highest population at 637 or .62. *German or other West Germanic Languages* had the second highest population at 137 or .13%, and *Russian, Polish, or other Slavic languages* had the third highest population at 128 or .12%. 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.

BRPC					
Language Spoken at Home for the Population 5 Years and Over					
Source: [2023]: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001					
Population 5 years and over by language spoken at home and ability to speak English	Lincoln County	Montgomery County	Warren County	Service Area Total	Percentage of Total Population 5 Years and Older
Total Population 5 Years and Over	57,471	10,759	34,450	102,680	100.00%
Speak Only English	56,081	10,540	33,352	99,973	97.36%
Total Speak English “less than very well”	583	38	429	1,050	1.02%
Spanish	746	63	786		
Speak English “less than very well”	275	19	343	637	0.62%
French, Haitian, or Cajun	105	37	6	148	
Speak English “less than very well”	23	0	0	23	0.02%
German or other West Germanic languages	221	76	153	450	
Speak English “less than very well”	114	0	23	137	0.13%
Russian, Polish, or other Slavic languages	132	7	0	139	
Speak English “less than very well”	128	0	0	128	0.12%
Other Indo-European languages	23	0	121	144	
Speak English “less than very well”	5	0	63	68	0.07%
Korean	7	0	0	7	
Speak English “less than very well”	0	0	0	0	0.00%
Chinese (incl. Mandarin, Cantonese)	53	19	6	78	
Speak English “less than very well”	27	19	0	46	0.04%
Vietnamese	4	1	0	5	
Speak English “less than very well”	2	0	0	2	0.00%
Tagalog (inc. Filipino)	96	13	2	111	
Speak English “less than very well”	6	0	0	6	0.01%
Other Asian & Pacific Island languages	3	0	15	18	
Speak English “less than very well”	3	0	0	3	0.00%
Arabic	0	0	2	2	
Speak English “less than very well”	0	0	0	0	0.00%
Other and unspecified languages	0	3	7	10	
Speak English “less than very well”	0	0	0	0	0.00%

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

The BRPC staff reviewed the frequency with which office staff have, or could have, contact with LEP persons. To date, BRPC has, on average, no requests for an interpreter. BRPC averages 0 phone calls per month with people with Limited English Proficiency.

LEP Staff Survey Form

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

1. How often do you come into contact with individuals 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	Responses (and Language Spoken by LEP individuals)
Daily	0
Weekly	0
Monthly	0
Less frequently than monthly	0

Language Assistance Requests Log

[illegible]

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

Outreach activities, summarized in BRPC'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.

Community Agency LEP Survey

Organization:

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language barriers?
4. How can Boonslick Regional Planning Commission utilize your language assistance services? (If applicable)
5. Additional Comments

4. The resources available to BRPC and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards and/or "I speak" cards
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) Boonslick Regional Planning Commission 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, Boonslick Regional Planning Commission will evaluate its vital documents and provide translations.

Boonslick Regional Planning Commission will provide assistance and direction to LEP persons upon request.

Overall Costs:

Overall costs to provide LEP assistance with the above strategies for engaging individuals with Limited English Proficiency should be very minimal considering there is such a small number of LEP population within the Boonslick Regional Planning Commission service area.

Staff LEP Training

The following training will be provided to BRPC staff:

1. Information on BRPC Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Presentation on the documentation of language assistance requests.

Boonslick Regional Planning Commission 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. Click or tap here to enter text. 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 BRPC’s Title VI Plan requirement.

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

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American	Native Indian	Total
BRPC Board	100% (41)	0	0	0	0	100%
TAC Advisory Committee	100% (27)	0	0	0	0	100%
						100%

Description of efforts made to encourage minority participation on committees:

- Board is made up of elected officials
- Public meetings and hearings are posted on the front door of Boonslick Regional Planning Commission offices in accordance with the Missouri Sunshine Law in order to encourage attendance and participation by members of the broader community that may be at BRPC offices for other purposes.

I. Subrecipient Assistance

Subrecipient Assistance

BRPC does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

BRPC does not have any subrecipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when Boonslick Regional Planning Commission 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.

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

Equity Analysis Guidance

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

Demographic data and mapping

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

L. Fixed Route Transit Providers

Boonslick Regional Planning Commission 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 Boonslick Regional Planning Commission.

M. Attachments

Attachment 1: Boonslick Regional Planning Commission

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:
Kim Meyer, Title VI Coordinator
Boonslick Regional Planning Commission
111 Steinhagen Drive, Warrenton, MO 63383
kmeyer@boonslick.org
Phone: (636) 456-3473 Fax: (636) 456-2329

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 on next page

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 Kim Meyer at 111 Steinhagen Rd, Warrenton, MO 63383, or at 636-456-3473.

Attachment 2

BRPC Bylaws Pertaining to Governing Board ARTICLE V EXECUTIVE COMMITTEE

1. General Powers-The operational affairs of the Council shall be managed by the Executive Committee.
2. Voting Membership-The voting membership of the Executive Committee shall consist of six (6) voting members of the Council, who shall be elected at the Annual Meeting of the membership. The Executive Committee shall be geographically balanced, one (1) member from each county shall be a member of the County Court, or his/her designee. The remaining member from each county shall be mayors or chairpersons of the municipalities of the county, or their designees.
3. Terms of Office-The term of office for the members of the Executive Committee shall be two years.
4. Tenure-Members of the Executive Committee shall serve at the discretion of the respective local units of government for a term of two (2) years and shall be eligible for re-election.
5. Officers-The Chairman, Vice Chairman, Secretary, and Treasurer of the Executive Committee shall be elected by the membership at the Annual Meeting for a term of two (2) years, and shall serve as officers of the full Council. The officers shall serve not more than two (2) consecutive terms per office.
6. Meetings-The Executive Committee shall meet at the call of the Chairman, or at the request of four (4) voting members of the Executive Committee. All meetings of the Executive Committee shall be open and public, except as provided in the Revised Statutes of the State of Missouri.
7. Special Authority of the Executive Committee-The Executive Committee shall supervise the execution of the programs, the appointment of advisory and standing committees, the employment, and discharge of the Council Executive Director, and the control of expenditures incurred in the execution of the program of funds allocated to the Council. The Executive Committee shall also be charged with the direction of all other programs by the Council.
8. Quorum-A majority of the voting members of the Executive Committee present at the meeting shall constitute a quorum for the transaction of business at such meetings.
9. Voting-Each voting member of the Executive Committee, including the Chairman, shall have one (1) vote on all matters voted upon. Proxy voting shall not be permitted.
10. Postponement of Action-Action on any matter under consideration by the Executive Committee at any regular or special meeting may be postponed until the next monthly or special full Council meeting if so requested by any one voting member of the Council in attendance at such meeting.
11. Delegation of Authority to the Executive Director-The Executive Committee, with the concurrence of the full Council, may delegate to the Executive Director such authority as it deems necessary and appropriate.