

Special Neighbors Inc

Title VI Program

Date filed with MoDOT Transit Section:

DATE

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Attachments

Attachment 1 – Agency Information (Sample)

Attachment 2 – Title VI Complaint Form

Attachment 3 – Title VI Self Survey Form

A. Title VI Assurances

Special Neighbors Inc (SNI) 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.

SNI 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. SNI 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.

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

1. Mission of Special Neighbors Inc (SNI)

To support persons with disabilities in achieving their fullest potential.

2. History (including year started)

SNI is a private, CARF accredited, non-profit corporation established in 1978. The agency provides residential support and life skills training to adults with developmental disabilities. Transportation is an important component of the services offered. Individuals served are transported to and from medical appointments, shopping trips, recreational outings, employment, workshops, and day programs. SNI has eleven vehicles used for transportation services. Three of these vehicles were acquired through the MoDOT Section 5310 program. SNI is also the recipient of Missouri Elderly and Handicapped Transportation Assistance Program (MEHTAP) funding.

3. Regional Profile (regional population; growth projection)

As of the 2010 census Jackson County had a population of 674,158. The population grew 2.9% from 2000 to 2010 and is estimated to have grown 0.5% from 2010 to 2012.

4. Population served (in relation to regional population)

SNI supported 89 individuals in residential services in 2015. Individuals lived in the community in group homes, apartments and single-person dwellings.

5. Service area

As of August 2016, SNI provides services in the Kansas City metropolitan area of Jackson County. Transportation is not a stand-alone service of SNI, but is connected to other services as a necessary component. Services are directed by a person centered plan. Transportation needs are addressed in the plan.

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

SNI has a nine member board of directors. Board members are elected to a two year term. Board officers are elected to a one year term.

C. Notice to the Public

Notifying the Public of Rights under Title VI

Special Neighbors Inc (SNI) posts Title VI notices in public areas of our agency and in our vehicles.

SNI 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 SNI, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

How to file a Title VI complaint with SNI:

1. To obtain a Complain Form from SNI contact 816-531-0045.
2. In addition to the complaint process at SNI, 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.
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 816-531-0045.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Special Neighbors Inc's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person served who believes they have been discriminated against on the basis of race, color, or national origin by Special Neighbors Inc (SNI) 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 in public areas of our agency and in our vehicles.

You may request a copy by writing to SNI, 1010 W 39th Street, Kansas City, MO 64111. Information on how to file a Title VI complaint may also be obtained by calling the SNI Operations Director at 816-531-0045.

You may file a signed, dated complaint no more that 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 SNI, 1010 W 39th Street, Kansas City, MO 64111.

COMPLAINT ACCEPTANCE: SNI will process complaints that are complete.

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

INVESTIGATIONS: SNI will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, SNI may contact the complainant. Unless a longer period is specified by SNI, the complainant will have ten (10) days from the date of the letter to send requested information to the SNI 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 SNI'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. SNI 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, SNI 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 SNI at 1010 W 39th Street, Kansas City, MO 64111, or at 816-531-0045.

**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 Special Neighbors Inc’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

Special Neighbors Inc 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 involvement, by all identified audiences, in the 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 participation.
- To provide general notification of meetings and forums for input, in a manner that is understandable to all stakeholders
- 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:

- Individuals served by the agency's transportation services program
- Agency direct support staff – the staff responsible for supporting the individuals served
- Agency management – the staff responsible for ensuring agency policy and procedures are adhered to
- 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.
- Local jurisdictions and other government stakeholders
- 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. Stakeholder 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. Email.
 - ii. Regular mail.
 - iii. Phone calls.

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

SNI ensures all outreach strategies, communications and public involvement efforts comply with Title VI. SNI'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, SNI 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.

2013 – 2016 Title VI Program Public Engagement Process

SNI will conduct a Public Engagement Process for the 2013-2016 Title VI Program. This process includes Stakeholder 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.

SNI will provide briefings to the Board of Directors.

SNI will conduct a 30 day public comment period to provide opportunities for feedback on the 2013-2016 Title VI Program.

Comments are accepted during the public outreach period via:

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

Summary of 2013-2016 Public Outreach Efforts

SNI will provide Title VI program information during orientation for new individuals served.
SNI will provide Title VI program information during orientation for new employees.
SNI will provide Title VI program information no less than annually at each program site.
SNI will post Title VI notices at each program site and in SNI vehicles.

G. Language Assistance Plan

SNI Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address SNI '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: SNI provides services to individuals with disabilities in the Kansas City Metropolitan area of Jackson County. No direct fixed routes are run. Transportation is provided linked to a service provided, not as a stand-alone service. All services are linked to the individuals support plan. These plans include the transportation needs of the individual.

SNI 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 SNI. 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, SNI 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 SNI serves are proficient in the English language. Based on 2013 data, one person (1%) served by SNI speaks English "less than very well" – a definition of limited English proficiency. This is the first such person to be served by SNI in its 40 year history. While possible, SNI does not anticipate serving such individuals on a regular basis.

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

SNI staff reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. To date, SNI has had no requests for an interpreter. SNI averages[0] phone calls per month.

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

Due to the small number of LEP persons served, SNI is able to customize the program, activity, and service to meet the needs of LEP persons.

Staff LEP Training

The following training will be provided to SNI staff:

1. Information on SNI Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered.
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 SNI's Title VI Plan requirement.

SNI 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 SNI 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 SNI's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether SNI has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning SNI'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
Population Committee						100%
Access Committee						100%
Citizens Advisory Council						100%

Description of efforts made to encourage minority participation on committees:

- **Invite minority members to join by personal invitation**
-
-
-
-

I. Subrecipient Assistance

Sub recipient Assistance

OPTION A

SNI does not have any sub recipients.

OPTION B

Primary recipients should provide sub recipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a sub recipient.
- Direction regarding obtaining demographic information of population served by sub recipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

J. Sub recipient Monitoring

Sub recipient Monitoring

OPTION A

SNI does not have any sub recipients.

OPTION B

Primary recipients must monitor sub recipients.

- Non-compliant sub recipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all sub recipients are complying with the general and specific requirements.
- Collect and review sub recipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that sub recipients who provide transportation services verify that their level and quality of service is equitably provided.

K. Equity Analysis of Facilities

OPTION A

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

OPTION B1

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

OPTION B2

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, the “two-test” exercise was conducted and it was determined that the facility [facilities] could proceed, despite disparate impact, due to a “substantial legitimate justification” to meet a goal that is integral to the agency’s institutional mission. In addition, no comparable effective alternative location(s) would result in less disparate impact.

L. System-Wide Service Standards and Policies*

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

This does not apply to SNI.

M. Requirement to Collect and Report Demographic Data*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

This does not apply to SNI.

N. Requirement to Monitor Transit Service*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

This does not apply to SNI.

O. Service and Fare Equity Analysis*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and
200,000+ population.***

Major Service Change and Impact Policies

This does not apply to SNI.