



Title VI Program

Date filed with MoDOT Transit Section:
May 28, 2021

Approved by SMCOG Board of Directors
May 26, 2021

A. Title VI Assurances

The Southwest Missouri Council of Governments (SMCOG) 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.

SMCOG 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. SMCOG 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.

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

Additionally, as SMCOG is administered by the Center for Resource Planning and Management at Missouri State University, it also complies with the University’s non-discrimination policy statement which includes protections based on race, color, national origin (including ancestry, or any other subcategory of national origin recognized by applicable law), religion, sex (including marital status, family status, pregnancy, sexual orientation, gender identity, gender expression, or any other subcategory of sex recognized by applicable law), age, disability, veteran status, genetic information, or any other basis protected by applicable law in employment or in any program or activity offered or sponsored by the University.

B. Agency Information

1. Mission of SMCOG

The mission of SMCOG is to enhance the quality of our communities through regional cooperation.

2. History (including year started)

Established in May of 1989, The Southwest Missouri Council of Governments (SMCOG) offers a unique set of programs at the local and regional level. The purpose of the Council is to promote area-wide dissemination of information regarding issues and problems and to provide technical and advisory services for community betterment.

SMCOG is an association of local governments serving the ten southwest Missouri counties in the Springfield area. These include Barry, Christian, Dade, Dallas, Greene, Lawrence, Polk, Stone, Taney, and Webster counties. SMCOG is one of 19 active regional planning organizations throughout Missouri.

For many communities in the southwest Missouri region, the need for planning services is great since many towns and counties do not have professional planning resources, yet are facing many significant development issues. Through membership in SMCOG, such communities have access and facilities that would otherwise be unavailable.

SMCOG is administered and operated through the Center for Resource Planning and Management at Missouri State University. SMCOG is the only regional council in Missouri affiliated with a university. Through this unique partnership, SMCOG has access to a wide variety of resources and technical assistance at the university, and its staff (who are University employees) are subject to university policies and procedures. SMCOG's interaction with Southwest Missouri's local governments enhances Missouri State's Public Affairs Mission.

SMCOG operates under a variety of funding sources from the local, state and federal levels. Local revenues are derived from membership fees and charges for extra or special services such as local planning, grant administration, or technical contracts.

3. Regional Profile (regional population; growth projection)

According to the 2010 Census, the Southwest Missouri Council of Governments area population was 602,703 people. The overall population growth of the region from 2000 to 2010 was 17.90% percent, a significant decline in the growth rate from the previous decade's 25.70%. This decline may be attributable to the economic downturn that affected the nation in early 2008. Although all ten counties have historically shown positive population growth, with the exception of Dade County, which for the first time has lost population, there is a great deal of intra-regional variation, as one would expect in a planning area as large as SMCOG's. The population distribution across the ten counties is shown in Figure 3. Substantial growth continues to occur

in the northern portion of Christian County due to rapid development in and around Nixa and Ozark. In 2000, Christian County ranked as one of the fastest growing counties in the nation in relation to the 1990 census with a population increase of over 66%. That increase over the 2000-2010 time period has declined to 42.5%, still making it one of the fastest growing counties in Missouri.

Table 1. Population Projections						
County	2000	2010	Change '00 - '10	% Change	Projected 2020	Projected 2030
Barry	34,010	35,597	1,587	4.7%	40,917	44,295
Christian	54,295	77,422	23,127	42.6%	107,318	131,066
Dade	7,923	7,883	-40	-0.5%	7,294	6,977
Dallas	15,661	16,777	1,116	7.1%	19,984	22,172
Greene	240,391	275,174	34,783	14.5%	305,012	329,825
Lawrence	35,204	38,634	3,430	9.7%	43,272	47,249
Polk	26,992	31,137	4,145	15.4%	36,172	40,139
Stone	28,658	32,202	6,544	22.8%	37,427	40,346
Taney	39,703	51,675	11,972	30.2%	59,227	68,041
Webster	31,045	36,202	5,157	16.6%	45,880	53,282
SMCOG	513,882	602,703	91,821	17.9%	702,503	783,392
Missouri	5,595,211	5,988,927	393,716	7.0%	-	6,794,888
Arkansas	2,673,400	2,915,918	242,518	9.1%	-	3,462,622
Kansas	2,688,418	2,853,118	164,700	6.1%	-	3,140,008
Oklahoma	3,450,654	3,751,351	300,697	8.7%	-	4,302,501
Source: 2000 and 2010 US Census; MERIC 2030 Population Projections; UALR Institute for Economic Advancement 2030 Projections; KU Institute for Policy & Social Research; Oklahoma Dept. of Commerce 2012 Demographic State of the State Report						

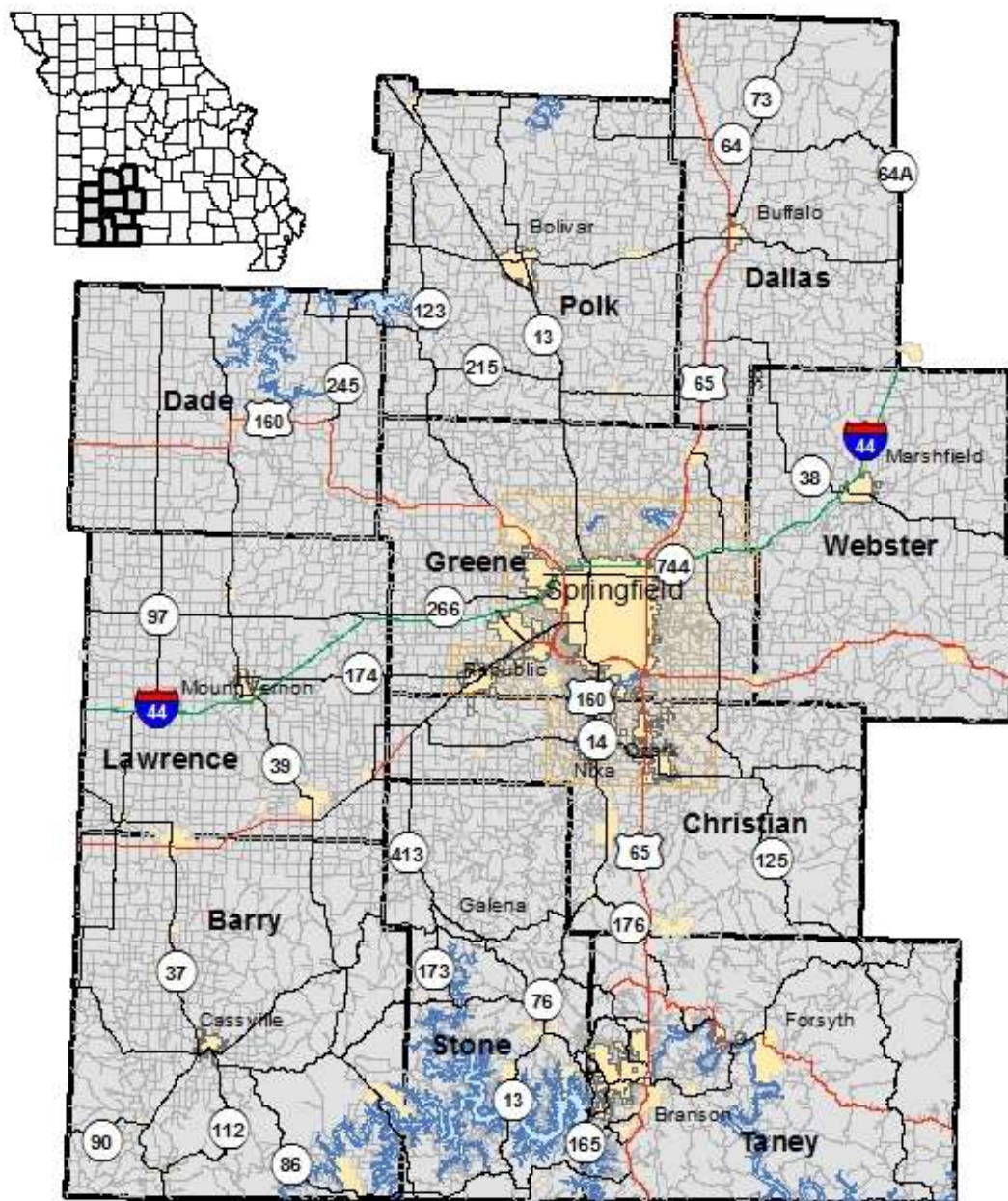
4. Population served (in relation to regional population)

SMCOG serves the entire regional population of 602,703 persons, per 2010 Census.

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

The ten-county area of Barry, Christian, Dade, Dallas, Greene, Lawrence, Polk, Stone, Taney, and Webster counties is the service area for SMCOG. Transportation planning services are provided to the ten-county area, excluding jurisdictions that fall within the boundaries of the metropolitan planning organization, the Ozarks Transportation Organization. SMCOG does not provide or fund any transit services.

SMCOG and OTO MPO Boundaries



Legend



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

The governing body of SMCOG is comprised of one representative from each of the government and non-government members of the Council.

Governmental Council members shall serve for a term of one year. Members' terms shall be terminated, however, when they no longer serve as a member of the county commission, or as a designated alternate of the county commission, or as mayor or chairperson, or as a designated alternate of the mayor or chairperson. Their successors shall be appointed by the local units of government making the original appointment. Members may serve successive terms.

Non-government Council members shall be appointed annually in June by the governmental members of the Council. Non-government members may serve successive terms. If any non-government member resigns or is unable to complete a term of appointment, a replacement representative may be appointed by the Council for the duration of such term.

Additionally, as previously noted, SMCOG is administered and operated through the Center for Resource Planning and Management at Missouri State University, which is governed by a 10-member Board of Governors (including 9 voting members and 1 non-voting student member), which members are appointed by the Governor of the State of Missouri and approved by the Missouri Legislature.

7. Council Administration

SMCOG has an administration agreement with the Center for Resource Planning and Management at Missouri State University (MSU). All SMCOC employees are Missouri State University employees, and the office and personnel are required to follow all University policies.

MSU has a number of policies pertaining to non-discrimination, with which SMCOC must comply. The MSU Policy Library is accessible online and available at <https://www.missouristate.edu/policy/>. Included within MSU's policy is G1.05 Non-Discrimination Policy Statement, which is the university's overarching governing policy which prohibits discrimination on any basis protected by law:

Missouri State University is a community of people with respect for diversity. The University emphasizes the dignity and equality common to all persons and adheres to a strict non-discrimination policy regarding the treatment of individual faculty, staff, and students. In accord with federal law and applicable Missouri statutes, the University does not discriminate on the basis of race, color, national origin (including ancestry, or any other subcategory of national origin recognized by applicable law), religion, sex (including marital status, family status, pregnancy, sexual orientation, gender identity, gender expression, or any other subcategory of sex recognized by applicable law), age, disability, veteran status, genetic information, or any other basis protected by applicable law in employment or in any program or activity offered or sponsored by the University. Sex discrimination encompasses sexual harassment, which includes sexual violence, and is strictly prohibited by Title IX of the Education Amendments of 1972.

This policy shall not be interpreted in a manner as to violate the legal rights of religious organizations or of military organizations associated with the Armed Forces of the United States of America.

The University maintains a grievance procedure incorporating due process available to any person who believes he or she has been discriminated against. Missouri State University is an Equal Opportunity/Affirmative Action/Minority/Female/Veterans/Disability/Sexual Orientation/Gender Identity employer. Inquiries concerning the complaint/grievance procedure related to sex discrimination, including sexual harassment and sexual assault, should be addressed to the Title IX Coordinator, Carrington Hall 205, 901 S. National Ave., Springfield, Missouri 65897, TitleIX@MissouriState.edu, 417-836-8506, or to the Office for Civil Rights. All other inquiries concerning the grievance procedure, Affirmative Action Plan, or compliance with federal and state laws and guidelines should be addressed to the Equal Opportunity Officer, Office for Institutional Equity and Compliance, Carrington Hall 205, 901 S. National Ave., Springfield, Missouri 65897, Equity@MissouriState.edu, 417-836-4252, or to the Office for Civil Rights. (Res. Board Policies No. 70-11; Bd. Min. 10-28-11.)

See https://www.missouristate.edu/equity/Nondiscrimination_Statement.htm.

The University also maintains several other policies which prohibit discrimination on the basis of a protected class and provide internal processes for reporting and investigating complaints, including:

Op1.02-2 Discrimination Complaint and Investigation Procedures, available at https://www.missouristate.edu/policy/Op1_02_2_ComplaintProcedures.htm

Op1.02-11 Title IX Sexual Harassment Grievance Procedure Policy

<https://www.missouristate.edu/Policy/Op1-02-11-title-ix-sexual-harassment-grievance-procedure.htm>

The University maintains additional policies designed to provide accommodations designed to prevent and/or eliminate discrimination, including:

Op1.02-11 Title IX Sexual Harassment Grievance Procedure Policy

<https://www.missouristate.edu/Policy/Op1-02-11-title-ix-sexual-harassment-grievance-procedure.htm>

Op1.02-1 Accommodations for Religious Observances Policy, available at https://www.missouristate.edu/policy/Op1_02_1_ReligiousAccommodation.htm

Op1.02-5 Employee Disability Accommodation Policy and Procedures, available at https://www.missouristate.edu/policy/Op1_02_5_DisabilityAccommodation.htm

Op5.05-1 Disability Accommodation Policy for Students, available at

https://www.missouristate.edu/Policy/Op5_05_1_Accommodation.htm

C. Notice to the Public

Notifying the Public of Rights under Title VI/ADA

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

SMCOG operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964, and in accordance with Missouri State University's Non-Discrimination Policy.

SMCOG operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans with Disabilities Act of 1990.

For more information on SMCOG's Title VI program, and the procedures to file a complaint, contact Jason Ray, Executive Director at 417-836-6900; JasonRay@MissouriState.edu; or visit our administrative office at 110 Park Central Square, Springfield, MO 65806. For more information visit <https://www.smcog.org/civil-rights>

If you believe you have been discriminated against on the basis of race, color, or national origin by SMCOG, 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: Jason Ray, Executive Director at 417-836-6900; JasonRay@MissouriState.edu.

How to file a Title VI/ADA complaint with SMCOG

1. Download a complaint form from the SMCOG website, <https://www.smcog.org/civil-rights> or obtain a hard copy at SMCOG offices located at:
110 Park Central Square
Springfield, MO 65806
2. Due to SMCOG's administration by Missouri State University, concerns may also be reported to:
Office for Institutional Equity and Compliance
Carrington Hall 205, 901 S. National Ave.
Springfield, Missouri 65897
Equity@MissouriState.edu

3. In addition to the complaint process above, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights: Region 7.

Offices are located at:

901 Locust Street
Suite 404
Kansas City, MO 64106

4. 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.
5. The form must be signed and dated and include your contact information.

If information is needed in another language, please email
JasonRay@MissouriState.edu

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of SMCOG'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 SMCOG 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 SMCOG Title VI Complaint Form at <https://www.smcog.org/civil-rights>, or request a copy by writing to SMCOG, 110 Park Central Square, Springfield, MO 65806. Information on how to file a Title VI complaint may also be obtained by calling 417-836-6900.

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:

Jason Ray, Executive Director
SMCOG
110 Park Central Square
Springfield, MO 65806

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

INVESTIGATIONS: SMCOG will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, SMCOG may contact the complainant. Unless a longer period is specified by SMCOG the complainant will have ten (10) days from the date of the letter to send requested information to the SMCOG 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 SMCOG'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. SMCOG 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, SMCOG 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 SMCOG at mailing address 110 Park Central Square, Springfield, MO 65806, or at 417-836-6900.

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 SMCOG'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

SMCOG's staff are given Title VI training, and agency can answer affirmatively to all the following questions:

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

F. Public Engagement Plan

Goal

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

Objectives

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

Identification of Stakeholders

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

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- 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 meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

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

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

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address
 - ii. Website
 - iii. Regular mail
 - iv. Forms using survey tool for compilation
 - v. Videotaping
 - vi. Phone calls to 417-836-6900

4. Response to Public Input

All public comments are provided to the appropriate committee or board prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

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

- a. Title VI non-discrimination notice on agency's website.
- b. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2021-2023 Title VI Program Public Engagement Process

SMCOG conducted a Public Engagement Process for the 2021-2023 Title VI Program. This process includes discussing the plan and providing briefings during Board of Directors and Advisory Committee meetings.

SMCOG conducted a 30-day public comment period to provide opportunities for feedback on the 2021-2023 Title VI Program.

Comments were accepted during the public outreach period via:

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

Summary of 2018-2020 Public Outreach Efforts

Held annual transportation needs meetings across region
All public outreach activities were held at accessible locations
In 2020 and 2021, SMCOG meetings were held via Zoom. A link and call-in number were posted at the SMCOG office and on the SMCOG website.

G. Language Assistance Plan

Limited English Proficiency Plan

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

SMCOG serves ten counties in southwest Missouri. These include: Barry, Christian, Dade, Dallas, Greene, Lawrence, Polk, Stone, Taney, and Webster counties. SMOG does not provide transportation planning services within the Springfield MPO boundaries, these are provided by the Ozarks Transportation Organization.

SMCOG 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 SMOG. 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, SMOG 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 ten-county, 602,703-person service area are proficient in the English language. Based on 2015-2019 American Community Survey data estimates 1.82% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

LEP Population in SMCOC Service Area												
Population 5 years and over by language spoken at home and ability to speak English	Barry County	Christian County	Dade County	Dallas County	Greene County *	Lawrence County	Polk County	Stone County	Taney County	Webster County	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over	33,477	80,241	7,216	15,569	272,340	35,633	29,809	30,382	52,006	35,792	592,465	100.00%
Speak English "less than very well"	1,409	852	29	378	4,687	1,245	369	155	956	727	10,807	1.82%
Spanish	2,307	1,543	59	133	6,160	2,317	131	380	2,010	368	15,408	2.60%
Speak English "less than very well"	1,219	385	9	16	1,817	1,070	7	109	642	59	5,333	0.90%
French, Haitian, or Cajun	50	49	0	13	438	39	18	5	93	6	711	0.12%
Speak English "less than very well"	30	25	0	13	87	0	18	0	5	0	178	0.03%
German	55	201	78	566	952	313	568	122	116	1,684	4,655	0.79%
Speak English "less than very well"	0	13	0	243	133	137	262	36	9	586	1,419	0.24%
Russian	29	436	8	0	522	35	0	27	156	43	1,256	0.21%
Speak English "less than very well"	0	130	8	0	240	16	0	3	126	8	531	0.09%
Indo-European	47	105	5	106	739	39	302	36	135	0	1,514	0.26%
Speak English "less than very well"	0	30	0	106	204	22	70	0	59	0	491	0.08%
Korean	0	24	0	0	408	0	8	0	59	0	499	0.08%
Speak English "less than very well"	0	13	0	0	214	0	0	0	8	0	235	0.04%
Chinese	11	6	42	0	1,343	0	2	7	59	55	1,525	0.26%
Speak English "less than very well"	0	0	11	0	667	0	0	7	17	41	743	0.13%
Vietnamese	0	213	0	0	1,162	0	0	1	12	0	1,388	0.23%
Speak English "less than very well"	0	135	0	0	617	0	0	0	0	0	752	0.13%
Tagalog	43	69	43	0	402	0	3	0	107	5	672	0.11%
Speak English "less than very well"	0	38	0	0	131	0	3	0	36	0	208	0.04%
Asian & Pacific Island	268	119	3	31	1,021	9	12	37	128	59	1,687	0.28%
Speak English "less than very well"	160	55	1	0	277	0	7	0	54	15	569	0.10%
Arabic	0	0	0	0	340	0	3	0	0	54	397	0.07%
Speak English "less than very well"	0	0	0	0	81	20	0	0	0	0	81	0.01%
All Other	0	121	0	0	449	7	43	9	41	45	715	0.12%
Speak English "less than very well"	0	28	0	0	219	0	2	0	0	18	267	0.05%

*Data Source: 2015-2019 American Community Survey; *Greene County data includes area lying within the Ozarks Transportation Organization boundaries.

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

The SMCOG staff reviewed the frequency with which staff have, or could have, contact with LEP persons. SMCOG has received zero requests for an interpreter since the last plan update.

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

Outreach activities, summarized in SMCOG'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 may 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.

Outside Organization 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 assistance needs?
4. When necessary, can we use these services?

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

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Use of Missouri State University translation and interpreter services.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

If SMCOG were to hold public meetings or distribute materials in areas with more than 1,000 LEP population, SMCOG will provide translation of vital written materials. SMCOG will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to SMCOG staff:

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

SMCOG 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 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 SMCOG's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether SMCOG has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning SMCOG'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	Total
Transportation Advisory Committee	100%	0%	0%	0%	100%
Comprehensive Economic Development Strategy Committee	100%	0%	0%	0%	100%
SMCOG Board of Directors	99.1%	0.9%	0%	0%	100%

Description of efforts made to encourage minority participation on committees:

- Encourage local jurisdictions, which nominate committee members, to look for diverse representation

I. Subrecipient Assistance

SMCOG does not have any subrecipients.

J. Subrecipient Monitoring

SMCOG does not have any subrecipients.

K. Equity Analysis of Facilities

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

SMCOG offices are owned by Missouri State University (MSU). MSU has an office of Planning, Design & Construction which oversees any facility construction. All new construction and renovations projects must be made in accordance with MSU design and construction policies and in compliance with the Americans with Disabilities Act (ADA). All general contractors who are awarded construction bids (rather new construction or renovation) are required to abide by such policies and ADA requirements.

Attachment A: SMCOC 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:

Jason Ray
Southwest Missouri Council of Governments
110 Park Central Square
Springfield, MO 65806
Fax: 417-836-4146
JasonRay@MissouriState.edu

PLEASE PRINT

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

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 13 above, please provide information about a contact person at the agency/court where the complaint was filed.
Name: _____ Title: _____
Agency: _____ Telephone: () _____ - _____
Address: _____
City: _____ State: _____ Zip Code: _____

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

Signature and date is required:

Signature

Date

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

Signature

Date

Attachment B: Title VI Self-Survey Form

Date filed with MoDOT Transit Section:

DATE

Survey Date:

Period Covered:

Name of Program/Grant:

A. Summary of Complaints:

B. Number of complaints for the period:

C. Number of complaints voluntarily resolved:

D. Number complaints currently unresolved:

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

- Name of complainant
- Race
- Allegation
- Findings
- Corrective Action
- Identify any policy/procedure changes made as a result of the complaint.
- Provide the date history (date complaint received through resolution)

1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?

YES _____ NO _____

2. Do new employees receive this information via employee orientation?

YES _____ NO _____

3. Is Title VI information provided to all employees and program applicants?

YES _____ NO _____

4. Is Title VI information prominently displayed in the organization and on relevant program materials?

YES _____ NO _____

5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants.

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

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

Signature: _____

Title: _____

Date: _____
