



COLE COUNTY RESIDENTIAL SERVICES, INC.
Civil Rights Title VI Plan
2014

Date filed with MoDOT Transit Section:
September 15, 2014

Title VI Plan

Table of Contents

A. Introduction / Title VI Assurances	page 2
B. Agency Information	page 3
• Mission Statement	
• History	
• Profile	
• Population Served	
• Service Area	
• Governing Body	
C. Notice to the Public	page 4
D. Procedure for Filing a Title VI Complaint	page 5
• Right to File a Complaint	
• How to File a Complaint	
• Complaint Acceptance	
• Investigations	
• Letters of Closure or Finding	
E. Title VI Complaints, Investigations, Lawsuits	page 6
F. Public Engagement Plan	pages 6 – 7
• Goal	
• Identification of Stakeholders	
• Elements of the Public Engagement Plan	
• Title VI Outreach Best Practices	
• CCRSI Public Engagement Plan	
G. Language Assistance Plan	pages 7 – 8
• Four-Factor LEP Analysis	
• Staff Training	
• Monitoring and Updating the LEP Plan	
H. Advisory Bodies	page 8
I. Subrecipient Assistance	page 8
J. Subrecipient Monitoring	page 8
K. Equity Analysis of Facilities	page 9
For Fixed Route Transit Providers (CCRSI is not a Fixed Route Provider)	
L. Standards and Policies	page 9
M. Data Reporting and Collection	page 9
N. Transit Service Monitoring	page 9
O. Service and Fare Equity Changes	page 9

A. Title VI Assurances

CCRSI 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.

CCRSI 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. CCRSI makes every effort to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

CCRSI will meet the objectives of the FTA Master Agreement which governs all entities applying for FTA funding 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; and,
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

CCRSI receives federal funds through contracts and grants administered by the Missouri Department of Transportation for capital equipment. As a sub-recipient of this funding, we are committed to assuring compliance with the Title VI Requirements for Federal Transit Administration Recipients as outlined in FTA Circular 4702.1B.

This plan was developed to guide CCRSI in its administration and management of Title VI-related activities.

B. Agency Information

1. Mission Statement

CCRSI respects individual choice by providing quality services and supports to people who have developmental disabilities.

2. History

In 1979, the citizens of Cole County, Missouri passed legislation (commonly referred to as SB40) allowing its citizens to tax themselves for services and supports for people with developmental disabilities. The legislation calls for the County Commission to appoint a nine member Board of Directors. This Board was originally called Cole County Group Homes for the Developmentally Disabled but later changed its name to Cole County Special Services. In 1980, the Board incorporated a 501c3 non-profit to administer the business of Cole County Special Services and provide services and supports it chooses to fund. This 501c3 is called Cole County Residential Services, Inc. CCRSI entered into agreements with the Missouri Department of Mental Health to provide Medicaid and Medicaid Waiver services and supports. These services are paid with federal, state and county funds.

3. Profile

CCRSI serves citizens of Cole County, Missouri. Drivers take people to work, to medical appointments, to pick up prescriptions, essential shopping and various other trips to meet their daily needs. Last year, 36% of the service provided was for transportation to work, followed by 19% for medical, 11% for nutrition, 9% for essential shopping, and various other purposes. These statistics have been relatively consistent for the last few years.

4. Population Served

CCRSI provides services and supports to individuals who have a developmental disability and live in Cole County, Missouri or have a legal guardian in Cole County, Missouri.

CCRSI services are available to all persons regardless of race, gender, color, religion, or national origin.

5. Service Area:

Cole County Missouri

6. Governing body (make-up, including minority representation)

CCRSI is governed by a 9 member Board of Directors comprised of at least two individuals related in the third degree by blood or marriage to a person with developmental disabilities. The Board of Directors meets twelve times per year at the CCRSI Administrative Office building in Jefferson City, MO. The Board of Directors is a policy making board and governed by a set of bylaws.

Board members are appointed by the Cole County Special Services Board. The CCSS Board appoints itself following the same 3 year term as appointed by the County Commission to the CCRSI Board. Every year, three members' terms expire. If those members are re-appointed to the CCSS Board, they also continue to serve on the CCRSI Board. Each Board Member serves until he/she resigns or is replaced. Eight of the nine Board members must be residents of Cole County.

The current makeup of the Board of Directors is as follows: 7 (78%) Males; 2 (22%) Females; and, 0 Minorities.

All CCRSI meetings are open to the public and are posted in CCRSI Administrative Offices.

C. Notice to the Public

Notifying the Public of Rights under Title VI

CCRSI will post Title VI notices on our agency's website and in public areas of our agency.

CCRSI operates its programs and services without regard to race, color, or national origin by CCRSI, 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 CCRSI, 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 CCRSI:

1. A Grievance Form is available on our website at www.ccrsi.org, or by calling the CCRSI Administrative Offices 573-634-4555 and requesting a copy by fax, email or mail.
2. In addition to the complaint process at CCRSI, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust St, Suite 404, Kansas City, MO 64106 or telephone 816-329-3920.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.

If information is needed in another language, contact CCRSI Administrative Office at 573-634-4555.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of CCRSI'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 CCRSI 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 the website, and in public areas of our agency.

You may download the CCRSI Title VI Complaint Form from www.ccrsi.org, or request a copy by writing to: CCRSI, 1908 Boggs Creek Rd., Jefferson City, MO 65101. Information on how to file a Title VI complaint may also be obtained by calling CCRSI Administrative Services Director at 1-573-634-4555, extension 307.

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 Director of Administrative Services, CCRSI, 1908 Boggs Creek Rd., Jefferson City, MO 65101.

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

INVESTIGATIONS: CCRSI's goal is to complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, CCRSI may contact the complainant. Unless a longer period is specified by CCRSI, the complainant will have ten (10) days from the date of the letter to send requested information to the CCRSI 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 CCRSI's determination, the complainant may appeal 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 appeal. CCRSI will notify the complainant of the decision either to accept or reject the appeal within ten (10) days. In cases the appeal is granted, CCRSI will issue a determination letter to the complainant upon completion of the appeal process.

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 CCRSI Administrative Services Director at 1908 Boggs Creek Rd., Jefferson City, MO 65101, or by calling 573-634-4555 Extension 307.

E. Monitoring Title VI Complaints, Investigations, Lawsuits

Documenting Title VI Complaints/Investigations

All Title VI complaints are entered and tracked in CCRSI'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. The CCRSI Title VI Complaint Log will track:

Date Complaint Filed; Date of Complaint; Basis of Allegation (Race, Color, National Origin); Brief Summary; Pending Status, Action taken by CCRSI; Date MoDOT Notified; Status Active/Inactive; Closure Letter; Letter of Finding; Date of CL or LOF.

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have ongoing involvement, by all Cole County citizens and stakeholders, in CCRSI 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 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:

- Citizens of Cole County particularly those with developmental disabilities and their advocates and specifically those minority and low income populations, including limited English proficient persons
- Board of Directors – the governing board of the agency. The role of the Board is to establish policy for the agency. The Board defines the agency's mission, establishes goals, and approves the budget to accomplish the goals.
- Local jurisdictions and other government stakeholders (city and county)
- Private businesses and organizations
- Partner agencies- Social Service Agencies, State Agencies such as the Department of Mental Health, Regional Planning Commissions.

Elements of the Public Engagement Plan

CCRSI will develop 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 and committee meetings. All meetings are open to the public with dates, locations and meeting information posted in the CCRSI Administrative Office and when a specific focus public meeting is scheduled, information is published in the local newspaper.
2. Public Engagement Process/Outreach Efforts:
 - a. Public meetings, health fairs, festivals and other public events.
 - b. Focus groups
 - c. Surveys
3. Public Comment
 - a. Formal public comment periods are used to solicit comments on 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. In person at public hearings
 - v. 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

CCRSI ensures all outreach strategies, communications and public involvement efforts comply with Title VI. CCRSI's Public Engagement Plan will proactively initiate the public involvement process and make concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. CCRSI will:

- a. Publish public notices in non-English publications (if needed);
- b. Place Title VI non-discrimination notice on the agency's website;
- c. Make agency communication materials in languages other than English (if needed); and,
- d. Offer services for Limited English Proficient persons. Upon advance notice, translators may be provided.

CCRSI Public Engagement Plan

- CCRSI will conduct a Public Engagement Plan for the 2014 Title VI Plan. This plan will include outreach to seek input, provide education, and highlight key components of the Title VI Plan.
- CCRSI will conduct a 30 day public comment period to provide opportunities for feedback on the 2014 Title VI Program. Notice of the comment period will be published in the Jefferson City News Tribune newspaper and our website, www.ccrsi.org.
- Comments are accepted during the public outreach period via email, postal mail, phone, or in person.

G. Language Assistance Plan

This limited English Proficiency (LEP) Plan has been prepared to address CCRSI'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.

CCRSI 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 CCRSI. 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 carry out this plan, CCRSI will use the **four-factor LEP analysis** which considers the following factors:

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

A significant majority of people in the CCRSI service area are proficient in the English language. According to the 2010 U.S. Census, only 1.6% of Missourians over 5 years of age speak English less than "very well." The number of native and foreign-born Missourians who speak English "not at all" is very low, with Spanish being the most common language.

LEP Population in Cole County

2010 Population: 75,990

Population 5 yrs. and older: 68,863

Speak Language other than English: 4.6%

Speak English very well: 3.0%

Speak English less than very well: 1.6%

Number of people who speak English less than very well: 1,102

2. Frequency of Contact by LEP Persons with CCRSI Services:

CCRSI staff reviewed the frequency with which office staff and direct care staff have, or could have, contact with LEP persons. To date, CCRSI has had no requests per year from LEP persons.

3. The importance of programs, activities or services provided by CCRSI to LEP persons:
Outreach activities, summarized in CCRSI's Title VI Public Engagement Plan, include events such as public meetings and/or open houses, and include outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.
4. The resources available to CCRSI and overall cost to provide LEP assistance:
Strategies for Engaging Individuals with Limited English Proficiency include:
 1. Language identification flashcards
 2. Written translations of vital documents
 3. One-on-one assistance through outreach efforts and contracted agencies
 4. Website information
 5. To the extent feasible, arrange interpreter if needed for public hearings and Board of Directors meetings and on the customer service phone lines. Communication with agencies in Missouri that assist LEP persons that are contacted as needed include:

Mid-Missouri Region:

Centro Latino de Salud

609 N. Garth Avenue Columbia, Missouri 65203, (573) 449-9442

Provide services and guidance in navigating the health, education and cultural resources of mid-Missouri

Statewide:

Legal Aid of Western Missouri

1125 Grand Ave. Kansas City, MO, (816) 474-6750

Assist the Hispanic population throughout the state. Offices located in Kansas City, Warrensburg, St. Joseph and Joplin.

Staff Training

The following training will be provided to CCRSI staff:

1. Information on CCRSI Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of CCRSI's Title VI Plan requirement.

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

H. Advisory Bodies

Description of efforts to be made to encourage minority participation on committees:

- *The Jefferson City News Tribune* newspaper - ads seeking volunteers; newspaper press releases and write-ups.
- Community events: health fairs, fundraisers.
- Personal contacts by other local volunteers and stakeholders.

I. Subrecipient Assistance

CCRSI does not have any sub-recipients.

J. Subrecipient Monitoring

CCRSI does not have any sub-recipients.

K. Equity Analysis of Facilities

Due to the nature of our services, CCRSI does not have members of the public come to our facilities on a regular basis. CCRSI provides door-to-door service to our clients - we pick them up at their residence and return them to their residence.

CCRSI built all facilities on vacant land so no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

FOR FIXED ROUTE TRANSIT PROVIDERS

L. System-Wide Service Standards and Policies

CCRSI does not operate any fixed route systems.

M. Requirement to Collect and Report Demographic Data

CCRSI does not operate any fixed route systems.

N. Requirement to Monitor Transit Service

CCRSI does not operate any fixed route systems.

O. Service and Fare Equity Analysis

CCRSI does not operate any fixed route systems.