L.I.F.E., Inc.

**Title VI Program**

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**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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* 1. **Title VI Assurances**

L.I.F.E., Inc. 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.

L.I.F.E., Inc. 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. L.I.F.E., Inc. 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.

L.I.F.E., Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including L.I.F.E., Inc. and its third-party contractors by promoting actions that:

1. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
2. Identify and address, as appropriate, disproportionally high and adverse effects of programs and activities on minority populations and low-income populations.
3. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
4. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
5. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).
   1. **Agency Information**
6. **Mission of L.I.F.E., Inc.**

Maximizing the Independence, Productivity and Empowerment of Individuals with Disabilities and Promoting the Full Inclusion of Individuals with Disabilities into the Mainstream of Society.

1. **History (including year started)**

In 1996, the non-profit L.I.F.E., Inc. applied for a grant from the State of Missouri to become a Center for Independent Living. This group of people, many of whom had disabilities and knew firsthand the challenges presented by society, had started meeting a year earlier with the goal of positively impacting the lives of people with disabilities in St. Francois, Ste. Genevieve, and Madison Counties. On April 14, 1997, the L.I.F.E., Inc. Center for Independent Living opened in Farmington.

1. **Regional Profile (regional population; growth projection)**

**L.I.F.E., Inc. main office is located in Farmington, MO., a branch office in Fredericktown, MO and another branch opening soon in Bismarck, MO. that serve a total population base of 96,847 people.**

1. **Population served (in relation to regional population)**

**L.I.F.E., Inc. serves all persons with disabilities regardless of gender, age, race, & income or disability type. L.I.F.E., Inc. offers services in these Southeast Counties: St. Francois, Madison and Ste. Genevieve.**

**Of the 96,847 people served in the L.I.F.E., Inc. service area, an estimated of approx. 15.5% of the population has at least one type of disability which is approx. 15,011 people.**

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

**L.I.F.E., Inc. offers choices and empowerment for individuals with disabilities in the Missouri Counties of Madison, St.**

**Francois and Ste. Genevieve.**

1. **Governing body make-up (include terms of office) BOARD COMPOSITION:**

**Selection of Board Members – The composition of the Board of Directors shall conform to Article III, Section 2 of**

**the by-laws. New board directors may be recommended by sitting board directors or may be recruited through a periodic newsletter or publication circulated within the service area. Prospective board directors shall be presented with the qualifications, at a regular meeting of the Board of Directors, and may be interviewed at that time. At the following regular meeting, the board directors shall discuss the admission of the applicant, and then vote “Yea”or “Nay” considering the applicant’s qualifications as required by the by-laws, and whether admission of the applicant conforms to the limitations of the composition of the Board, as stated in the by-laws.**

**Number, Tenure and Qualifications – The number of directors of the corporation shall be no more than nine (9). At all times the Board will be comprised of a minimum of fifty-one percent (51%) of the Directors of the corporation having a disability. Directors will serve on the board for a term of three (3) years with no limit on the number of terms served. The initial term of the existing directors of the board shall be determined at the October 1997 Board meeting to coincide with the election of officers. Directors must reside within the catchment area of the CIL. With respect to families, one person per family may serve on the Board of Directors at any one time. If a director has three (3) consecutive unexcused absences from meetings, he/she terminates membership on the Board, unless a majority of the directors vote to suspend this regulation. A Director may be removed from the Board of Directors for misconduct, conduct unbecoming a board member, conflict of interest or loyalties, or for any other reason deemed to be detrimental to the goals and aspirations of the agency by a majority vote of the Board of Directors.**

**Officers of the Board-**

* 1. **Tenure: The Chair, Vice-Chair, Secretary and Treasurer shall serve one year terms and shall be elected by a majority of the Board Directors at the annual meeting on the second Tuesday of October each year.**
  2. **Duties of the Chair: The Chair shall be the principal officer of the corporation and, subject to the control of the Board of Directors, shall in general supervise and control all of the business and affairs of the corporation. The Chair may sign with the Secretary or any other proper officer of the corporation thereunto authorized by the Board of Directors, any deeds, mortgages, bonds, contracts, or other instruments which the Board of Directors has authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by theses by-laws to some other officer or agent of the corporation, or shall be required by law to otherwise signed or executed; and in general shall perform all duties incident to the office of Chair and such other duties as may be prescribed by the Board of Directors from time to time.**
  3. **Duties of the Vice-Chair: In the absence of the chair, or in event of the chair’s death, inability or refusal to act, the vice-chair shall perform the duties of the chair, and when so acting, shall have all the powers of and be subject to all the restrictions upon the Chair. The Vice-Chair shall perform such other duties as from time to time may be assigned to him/her by the Chair or by the Board of Directors. Provide for the office of Second Vice-Chair to fulfill the duties of the Vice-Chair whenever the Vice-Chair is unable to perform such duties.**
  4. **Duties of the Secretary: The Secretary shall. (a) Keep the minutes of the proceedings of the Executive Sessions of the Board of Directors in one or more books provided for that purpose; (b) See that all notices are duly given in accordance with the provisions of these By-Laws or as required by law; (c) Be custodian of the corporate records and seal of the corporation and see that the seal of the corporation is affixed to all documents the execution of which on behalf of the corporation under its seal is duly authorized; (d) Keep a register of the post office address of each Director; (e) In general, perform all duties as from time to time may be assigned to him/her by the President or the Board of Directors.**
  5. **Duties of the Treasurer: The Treasurer shall. (a) have charge and custody of and be responsible for all funds and securities of the corporation; (b) Receive and give receipts for monies due and payable to the corporation from any source whatsoever, and deposit all such moneys in the name of the corporation in such banks, trust companies or other depositories as shall be selected in accordance with the provisions of Article V of the By-Laws; and (c) In general perform all of the duties incident to the office of Treasurer and such other duties as from time to time may be assigned to him/her by the Chair or by the Board of Directors. If required by the Board of Directors, the Treasurer shall give a bond for the faithful discharge of his/her duties in such sum and with such surety or sureties as the Board of Directors shall determine.**
  6. **Advisory Committee: The Board of Directors shall appoint an Advisory Committee for consultation and support as needed.**

**Removal from Board – In addition to termination referenced in Section II-2 a member may also be removed for misconduct, conduct unbecoming a Board Director, conflict of interest or loyalties or for any other reason deemed to be detrimental to the goals and aspirations of the agency.**

**Vacancies – Vacancies shall be filled as soon as practicable.**

**Honorary Board Members – The Board may at any regular meeting, elect an Honorary Member of the Board. Said Honorary membership shall not have voting rights. The limitation under II-2 shall not apply to honorary board directors.**

**MEETINGS AND MINUTES:**

**Annual Meeting – The Board shall meet on the second Tuesday of each October to elect officers of the Corporation.**

**Regular Meetings – The Board of Directors may provide, by resolution, the time and place for the holding of additional regular meetings without other notice than such resolution.**

**Special Meetings – Special meetings of the Board of Directors may be called by or at the request of the Chair or any two Directors. The person or persons authorized to call special meetings of the Board of Directors may fix the place for holding any special meeting of the Board of Directors called by them.**

**Quorum – Fifty-one percent (51%) of the Board of Directors shall constitute a quorum for the transaction of business at any meeting of the Board of Directors, but if less than fifty-one (51%) is present at a meeting, a majority of the directors present may adjourn the meeting from time to time without further notice.**

**Manner of Acting – The act of the majority of the Directors present at a meeting at which a quorum is present shall be the act of the Board of Directors. Proxies properly executed, signed and notarized shall be acceptable to the Board as if the member were present and shall authorize the holder of said proxy to vote in his/her stead at any regular or special Board meeting. Said proxy shall be given only to an existing Board Director.**

**Notice of any special meeting shall be given at least twenty-four (24) hours notice by written or oral notice in person, or oral notice by telephone including message left on answering machine. The attendance of a director may waive notice of any meeting. The attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except where a director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.**

**Action Without a Meeting – Any action that may be taken by the Board of Directors at a meeting may be taken without a meeting if a consent in writing, setting forth the action so to be taken, shall be signed before such action by all of the Directors.**

**Approval of Motions – Any motion before the Board must be approved by a simple majority vote of the Board.**

**Minutes – Minutes of each regular and special meeting shall be kept by the Secretary of the Corporation. Any executive session minutes shall contain only motion, seconds and votes and shall be attached to the regular minutes.**

* 1. **Notice to the Public**

# Notifying the Public of Rights under Title VI

L.I.F.E., Inc. posts Title VI notices on our agency’s website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

L.I.F.E., Inc. 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.

For more information on the L.I.F.E., Inc.’s, of Farmington, MO Title VI program, and the procedures to file a complaint, contact Pauline Niehaus at (573) 756- 4314 ext. 43; paulinen@lifecilmo.org; or visit our administrative office at 725 E. Karsch Blvd. Farmington, MO, 63640. For more information visit [www.lifecilmo.org.](http://www.lifecilmo.org/)

If you believe you have been discriminated against on the basis of race, color, or national origin by L.I.F.E., Inc. 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 L.I.F.E., Inc.**

1. To obtain a Complaint Form, please contact L.I.F.E., Inc. at (573) 756-4314 ext. 43 or on our website at [www.lifecilmo.org.](http://www.lifecilmo.org/)
2. In addition to the complaint process at L.I.F.E., Inc. complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region VII, 1-800-368-1019.
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 (573) 756-4314 ext. 43.

* 1. **Procedure for Filing a Title VI Complaint Filing a Title VI Complaint**

The complaint procedures apply to the beneficiaries of L.I.F.E., Inc.’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 L.I.F.E., Inc. may file a Title VI com-plaint 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 L.I.F.E., Inc. Title VI Complaint Form at [www.lifecilmo.org,](http://www.lifecilmo.org/) or request a copy by writing to PO Box 967, Farmington, MO 63640 Information on how to file a Title VI complaint may also be obtained by calling L.I.F.E., Inc. at (573) 756-4314 ext 43.

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 Pauline Niehaus, Transportation Manager, PO Box 967 Farmington, MO 63640.

COMPLAINT ACCEPTANCE: L.I.F.E., Inc. will process complaints that are complete.

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

INVESTIGATIONS: L.I.F.E., Inc. will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, L.I.F.E., Inc. may contact the complainant. Unless a longer period is specified by L.I.F.E., Inc., the complainant will have ten (10) days from the date of the letter to send requested information to the L.I.F.E., Inc. 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 L.I.F.E., Inc.’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. L.I.F.E., Inc. 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, L.I.F.E., Inc. 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 Pauline Niehaus at 725 E. Karsch Blvd. Farmington, MO, or at 573-756-4314 ext. 43.

* 1. **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 L.I.F.E., 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 |
|  |  |  |  |  |  |  |  |  |

No complaints have been filed at this time regarding L.I.F.E., Inc.

**Documenting Evidence of Agency Staff Title VI Training**

L.I.F.E., Inc.’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?
   1. **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.
* Agency Transit riders and clients
* 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**
   1. 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:**
   1. Public meetings
   2. Open houses
   3. Rider forums
   4. Rider outreach
   5. Public hearings
   6. Focus groups
   7. Surveys
   8. 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.

1. **Public Comment**
   1. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
   2. Comments are accepted through various means:
      1. Dedicated email address.
      2. Website.
      3. Regular mail.
      4. Forms using survey tool for compilation.
      5. Videotaping.
      6. Phone calls to Customer Service Center [phone]
2. **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**

L.I.F.E., Inc. ensures all outreach strategies, communications and public involvement efforts comply with Title VI. L.I.F.E., Inc.’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, L.I.F.E., Inc. provides the following:

1. Public notices published in non-English publications (if available).
2. Title VI non-discrimination notice on agency’s website.
3. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
4. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

**2019 – 2022 Title VI Program Public Engagement Process**

L.I.F.E., Inc. will conduct a Public Engagement Process for the 2019-2022 Title VI Program. This process includes 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.

L.I.F.E., Inc. will conduct briefings to the Board of Directors and Advisory Bodies.

L.I.F.E., Inc. 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:

1. Email
2. Mail
3. Phone
4. In person
5. Survey tool (agency option)

**Summary of 2016-2019 Public Outreach Efforts**

*Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.*

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

*L.I.F.E., Inc. has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public was invited to participate in these activities:*

**Board Meetings**- The Board of Assistant Directors holds monthly meetings and the public is invited to attend.

**Public Meetings**- When new service is proposed, information is disseminated to the ridership affected and public meetings will be scheduled.

**Customer Complaint Process**- Citizens may call L.I.F.E., Inc. at 800-596-7273 to lodge a complaint or comment. All complaints/comments are input into a database and then

distributed to the relevant manager who researches the complaint and responds back to the citizen.

**General Awareness and Phone Surveys**- We conduct onboard rider and general awareness surveys annually. Needs assessment surveys and other public surveys are developed to assist L.I.F.E., Inc. in gathering information to develop services.

**Bilingual Outreach**- L.I.F.E., Inc. provides Spanish translation services upon request. The management will assist with outreach programs and public meetings.

*We submit to the Missouri Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.*

* 1. **Language Assistance Plan**

**L.I.F.E., Inc.’s Limited English Proficiency Plan**

This limited English Proficiency (LEP) Plan has been prepared to address L.I.F.E., Inc.’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:

L.I.F.E., Inc. center for Independent Living offers choices and empowerment for individuals with disabilities in the Missouri counties of St. Francois, Ste. Genevieve and Madison.

L.I.F.E., Inc. 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 L.I.F.E., Inc. 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, L.I.F.E., Inc. 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 L.I.F.E., Inc. service area are proficient in the English language. Based on 2010-2014 Census data, 2.6% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency, the majority of this population is in Saint Francois County.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **LEP Population in L.I.F.E., Inc. Service Area** | | | | | |
| **Population 5 years and over by language spoken at**  **home and ability to speak English** | **St. Francois County** | **Madison County** | **Ste.**  **Genevieve County** | **Service Area Total** | **Percentage of Population 5 Years and Older** |
| **Population 5 Years and Over** | 58,764 | 11,441 | 16,822 | 87,027 | 100% |
| Speak English “less  than very well” | 1628 | 329 | 273 | 2,230 | 2.6% |
| **Spanish** |  |  |  |  |  |
| Speak English “less  than very well” | 97 | 76 | 90 | 263 | 0.3% |
| **Arabic** |  |  |  |  |  |
| Speak English “less  than very well” | 107 | 0 | 0 | 107 | 0.1% |
| **French** |  |  |  |  |  |
| Speak English “less than very well” | 45 | 0 | 34 | 79 | 0.09% |
| **All Other** |  |  |  |  |  |
| Speak English “less  than very well” | 144 | 16 | 44 | 204 | 0.2% |

1. Frequency of Contact by LEP Persons with L.I.F.E., Inc.’s Services:

The L.I.F.E., Inc. staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, L.I.F.E., Inc. has, on average, no request for an interpreter. L.I.F.E., Inc. averages 0 phone calls per month.

|  |
| --- |
| LEP Staff Survey Form  L.I.F.E., Inc. 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 passengers who do not speak English or have trouble understanding you when you speak English to them?   DAILY WEEKLY MONTHLY LESS THAN MONTHLY   1. What languages do these passengers speak? 2. What languages (other than English) do you understand or speak? 3. Would you be willing to serve as a translator when needed? |

|  |  |
| --- | --- |
| **Frequency of Contact with LEP Persons** | |
| **Frequency** | **Language Spoken by LEP Persons** |
| Daily |  |
| Weekly |  |
| Monthly |  |
| Less frequently than monthly |  |

1. The importance of programs, activities or services provided by L.I.F.E., Inc. to LEP persons:

Outreach activities, summarized in L.I.F.E. Inc.’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 under-standing 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?
5. The resources available to L.I.F.E., Inc. 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.
  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.

*As applicable*: Based on our demographic analysis (Factor 1) L.I.F.E., Inc. has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written

translated “vital documents” by language group(s).

L.I.F.E., Inc. will provide assistance and direction to LEP persons who request assistance.

**Staff LEP Training**

The following training will be provided to L.I.F.E., Inc. staff:

1. Information on L.I.F.E., Inc. 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 L.I.F.E., Inc.’s Title VI Plan requirement.

L.I.F.E., Inc. 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 L.I.F.E., Inc. 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 L.I.F.E., Inc.'s financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether L.I.F.E., Inc. has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning L.I.F.E., Inc.’s failure to meet the needs of LEP individual.
   1. **Advisory Bodies**

**Table Depicting Membership of Committees, Councils, By Race**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Committee**  **[examples]** | **Caucasian** | **Latino** | **African**  **American** | **Asian**  **American** |  | **Total** |
| Board of Directors | 8 | 0 | 0 | 0 |  | 100% |

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

* **Our Board of Directors is comprised of a minimum of 51% of people with disabilities**
* **Providing information to individuals about applying to be on the L.I.F.E., Inc. Board.**

**I. Subrecipient Assistance**

**Subrecipient Assistance**

L.I.F.E., Inc. does not have any subrecipients.

**J. Subrecipient Monitoring**

**Subrecipient Monitoring**

L.I.F.E., Inc. does not have any subrecipients.

**K. Equity Analysis of Facilities**

L.I.F.E., Inc. has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

**Attachment 1**

# L.I.F.E., Inc. TITLE VI 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: Pauline Niehaus

L.I.F.E., Inc.

PO BOX 967; Farmington, MO 63640

800-596-7273 or [paulinen@lifecilmo.org](mailto:paulinen@lifecilmo.org) 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 |
| 1. If you answered NO to question 3 above, please provide your name and address.    1. 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)  ( ) Other (please specify) |

Continued

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). *Use the back of this form or separate pages if additional space is required.* |
| 11. Please list any and all witnesses’ names and phone numbers/contact information. *Use the back of this form or separate pages if additional space is required.* |
| 12. What type of corrective action would you like to see taken? |
| 1. 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    1. ( ) Federal Agency (List agency’s name)    2. ( ) Federal Court (Please provide location)    3. ( ) State Court    4. ( ) State Agency (Specify Agency)    5. ( ) County Court (Specify Court and County)    6. ( ) 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