

OZARK FoothILLS REGIONAL PLANNING COMMISSION

TITLE VI PROGRAM PLAN

July 1, 2024 – June 30, 2027

Date Approved by Ozark Foothills Board of Directors:

June 13, 2024

Date filed with MoDOT:

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A. Title VI Assurances

The Ozark Foothills Regional Planning Commission 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.

The Ozark Foothills Regional Planning Commission 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. The Ozark Foothills Regional Planning Commission 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.

The Ozark Foothills Regional Planning Commission meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including the Ozark Foothills Regional Planning Commission and its third-party contractors by promoting actions that:

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

Signed:



Title:

Executive Director

Date:

June 13, 2024

B. Agency Information

1. Mission of the Ozark Foothills Regional Planning Commission:

The Ozark Foothills Regional Planning Commission was created to facilitate the cooperative effort of its member municipalities and counties in solving problems and planning the future development of human, natural, and economic resources of the Ozark Foothills region. The Commission serves as a guide to local units of government in accomplishing a coordinated and efficient development of the region and the promotion of its public health, safety, general welfare, and economic prosperity in accordance with the area's existing and future needs.

2. History (including year started)

On February 9, 1967, Governor Warren E. Hearnes signed the designation creating the Ozark Foothills Regional Planning Commission to assist the counties of Butler, Carter, Reynolds, Ripley, and Wayne. The OFRPC is a voluntary council of governments that provides a variety of technical assistance to the sixteen municipal and five county governments in southern Missouri.

3. Regional Profile (regional population; growth projection)

The Ozark Foothills Region is a five-county, 3,410 square mile area located in the southeast section of the state. The Ozark Foothills Region has 75,081 residents, according to the 2020 US Decennial Census, an approximate 10% decrease from the 83,376 reported in the 2010 census. Making up this 2020 population total are Butler County, with 42,130 residents, Carter County, 5,202 residents, Reynolds County with 6,096 residents, Ripley County with 10,679 residents, and Wayne County with 10,974 residents.

The Ozark Foothills Region includes 16 incorporated places within its five counties. Butler County has the largest population with 42,130 residents, more than half of the total population in the region. In terms of land area, Butler County ranks third with 697.5 total square miles and a population density of 60.4 persons per square mile. There are four incorporated places in the county, the cities of Fisk, Neelyville, Poplar Bluff and Qulin. Poplar Bluff is the county seat and the largest incorporated place in the county and the region with 16,225 residents.

Carter County is the smallest county both in terms of geography and population. The county covers 509 square miles and has a population of 5,202 residents. There are three incorporated places in the county, Ellsinore, Grandin, and Van Buren. The City of Van Buren is the county seat and the largest town in the county with a population of 747 residents.

Reynolds County is the largest county in the region in terms of geography with a land area of 808 square miles. The county ranks fourth in population size with 6,096 residents. There are three incorporated places in the county, the Cities of Bunker, Centerville, and Ellsinore. The City of Centerville serves as the county seat and has a population of 167.

Ripley County is the third largest county in terms of population and the fourth largest county in terms of geography. According to the 2020 US Census, the county is home to 10,679 residents and covers 632 square miles. There are two incorporated places in Ripley County, the Cities of Doniphan and Naylor. The City of Doniphan serves as the county seat with a population of 1,781.

Wayne County is the second largest county in terms of population and the second largest in terms of geography. The county is home to 10,974 residents and covers a total land area of 763 square miles. There are four incorporated locations in the county, the Cities of Greenville, Piedmont, and Williamsville, and the Village of Mill Spring. The City of Greenville serves as the county seat.

According to population projections from the Missouri Office of Administration, Division of Budget and Planning, the Ozark Foothills Region will experience a decrease in population of 1.83% or 1,444 persons between 2000 and 2030. Wayne County is projected to experience the greatest decrease in population during this 30 year time period with a decrease in population of 2,059 persons or 15.5%. Carter and Reynolds Counties are also projected to see a decrease in population of 104 and 404 persons respectively. Butler and Ripley Counties however are projected to realize a modest gain in population. Butler County's population is expected to increase by 624 persons or 1.5% and Ripley County's population is projected to realize the largest percentage gain in population in the region of 3.69% or 499 persons.

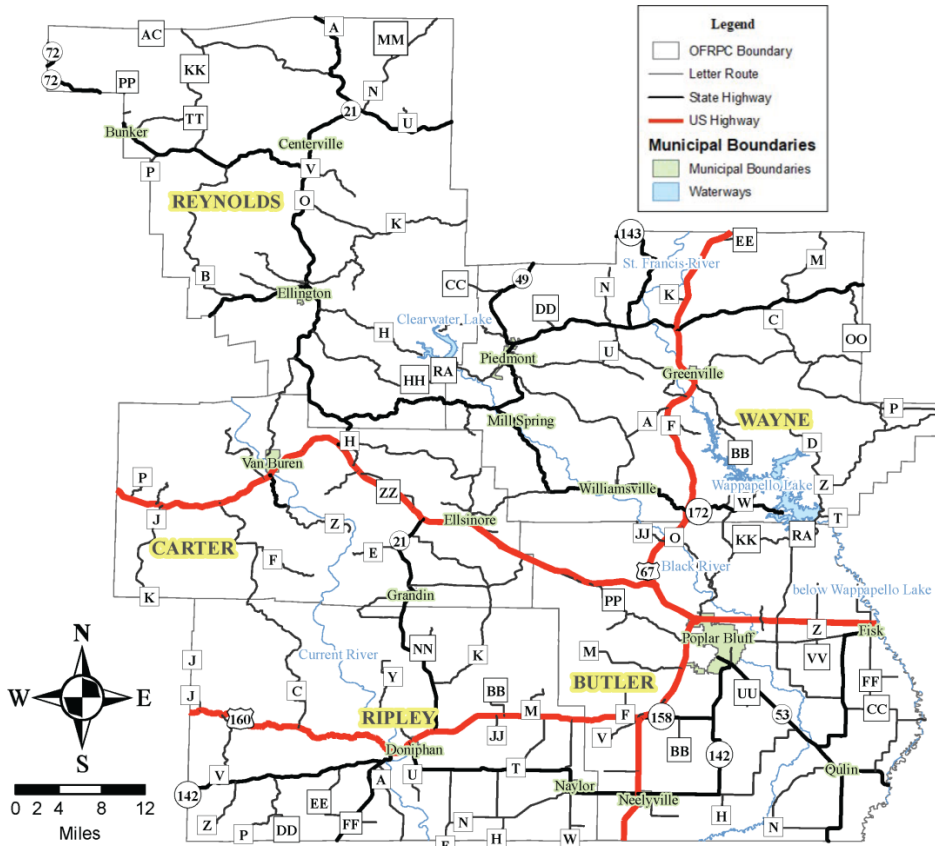
4. Population served (in relation to regional population)

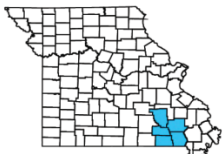

The Ozark Foothills Regional Planning Commission serves the entire population of the five county region, all 75,081 citizens.

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

See following page.

OFRPC Transportation Basemap



<p>Ozark Foothills Regional Planning Commission</p>  <p>Serving Butler, Carter, Reynolds, Ripley & Wayne Counties</p>	<h2>Base Map</h2> <p>January 2023</p>	<p>Created by Ozark Foothills Regional Planning Commission 3019 Fair St. Poplar Bluff, MO 63901 In partnership with the Missouri Department of Transportation</p> <p>To the best knowledge of the author, the data presented here is true and accurate. However, no responsibility is assumed by the author.</p> 
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6. Governing body make-up (include terms of office)

The OFRPC Board of Directors is a voluntary association of local units of governments within the Ozark Foothills Region. Each municipality and each county is entitled to one representative to serve as a director. Also the following community sectors are allowed two representatives each: agriculture, business, education, the elderly, finance, minorities, the professions, social agencies, solid waste. Also, one representative serves for the disadvantaged sector.

C. Notice to the Public

Notifying the Public of Rights under Title VI

The Ozark Foothills Regional Planning Commission posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and via social media.

The Ozark Foothills Regional Planning Commission 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 Ozark Foothills Regional Planning Commission's Title VI program, and the procedures to file a complaint, contact the Executive Director at 573-785-6402; info@ofrpc.org; or visit our administrative office at 3019 Fair Street, Poplar Bluff, MO 63901. For more information visit <https://www.ofrpc.org/rpc.php>.

If you believe you have been discriminated against on the basis of race, color, or national origin by the Ozark Foothills Regional Planning Commission, 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/ADA complaint with the Ozark Foothills Regional Planning Commission:

1. Call (573) 785-6402 between the hours of 8:00 am and 4:00 pm Central Standard Time, or write to Ozark Foothills Regional Planning Commission, 3019 Fair Street, Poplar Bluff, MO 63901.
2. In addition to the complaint process at the Ozark Foothills Regional Planning Commission, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed, dated, and include your contact information.

If information is needed in another language, contact the Executive Director at [\[573-785-6402\]](tel:573-785-6402) or info@ofrpc.org. This Notice is posted on our agency's website, in public areas of our agency, and on social media.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of the Ozark Foothills Regional Planning Commission'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 The Ozark Foothills Regional Planning Commission 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 Ozark Foothills Regional Planning Commission's Title VI Complaint Form at <https://www.ofrpc.org/rpc.php>, or request a copy by writing to Ozark Foothills RPC, 3019 Fair Street, Poplar Bluff, MO 63901. Information on how to file a Title VI complaint may also be obtained by calling the Executive Director at (573) 785-6402.

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 Ozark Foothills RPC, 3019 Fair Street, Poplar Bluff, MO 63901

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

INVESTIGATIONS: The Ozark Foothills Regional Planning Commission will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, the Ozark Foothills Regional Planning Commission may contact the complainant. Unless a longer period is specified by the Ozark Foothills Regional Planning Commission, the complainant will have ten (10) days from the date of the letter to send

requested information to the Ozark Foothills Regional Planning Commission's 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 the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or action will occur.

If the complainant disagrees with the Ozark Foothills Regional Planning Commission'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. The Ozark Foothills Regional Planning Commission 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, the Ozark Foothills Regional Planning Commission will issue a determination letter to the complainant upon completion of the reconsideration review.

A Determination Letter for cases where reconsideration is granted summarizes the allegations, the original finding, the basis for reconsideration, the final findings, and what remedial action(s) are necessary disciplinary action, additional training of the staff member, or other action will occur.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, East Building, 5th Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

The Ozark Foothills Regional Planning Commission will notify the Missouri Department of Transportation of all Discrimination complaints within **72 hours** by contacting the MoDOT Title VI Coordinator via the External Civil Rights main line at (573) 526-2978; or via e-mail at TitleVI@modot.mo.gov.

If information is needed in another language, contact the Ozark Foothills Regional Planning Commission at 3019 Fair Street, Poplar Bluff, MO 63901, or at (573) 785-6402.

**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 the Ozark Foothills Regional Planning Commission’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

During the reporting period, the Ozark Foothills Regional Planning Commission had 0 Title VI Complaints.

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

The Ozark Foothills Regional Planning Commission’s staff is 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?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

The following Title VI training will be provided to Ozark Foothills Regional Planning Commission's staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and Ozark Foothills Regional Planning Commission's obligations under Title VI.
2. Information regarding displayed Title VI information and program materials such as the Title VI Nondiscrimination Notice to the Public.
3. Information on Ozark Foothills Regional Planning Commission's Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on Ozark Foothills Regional Planning Commission's outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

Ozark Foothills Regional Planning Commission will identify staff that are likely to routinely encounter or have frequent contact with members of the public and/or customers, as well as their supervisors and all management staff. Ozark Foothills Regional Planning Commission will include the Title VI training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their Title VI responsibilities on a yearly basis.

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

F. Public Engagement Plan

Goal

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

Objectives

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

Identification of Stakeholders

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

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves the 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.
- 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

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

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

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address at info@ofrpc.org.
 - ii. Website at www.ofrpc.org
 - iii. Regular mail at 3019 Fair Street, Poplar Bluff, MO 63901
 - iv. Telephone at 573-785-6402

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

The Ozark Foothills Regional Planning Commission ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The Ozark Foothills Regional Planning Commission'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, the Ozark Foothills Regional Planning Commission provides the following:

- a. Public notices published in non-English publications (if available) that serve LEP populations.
- b. Title VI Non-Discrimination Notice to the Public posted at the following locations:
 - a. The agency's website.
 - b. Public areas of the agency's office(s) such as the Public Notice area
 - c. On social media such as facebook.com/ofrpc
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

Additional Best Practices Include:

- a. The distribution of agency materials and information such as brochures, newsletters, booklets, flyers, outreach and recruitment information, and other materials routinely disseminated to the public.
- b. Advertised public announcements through newspapers, website postings, social media postings, or radio stations.
- c. Partnering with local agencies and community-based organizations such as local non-profit (Ex. Butler County Community Resource Council), libraries (Ex. Doniphan-Ripley County Library), religious organizations, and/or other community-based organizations (Ex. FCC) to advertise services provided,
- d. Added public content to agency's webpage to communicate schedule changes and/or outreach activities at www.ofrpc.org.
- e. Public Content added to agency's social media to communicate schedule changes and/or outreach activities www.facebook.com/ofrpc.
- f. Hosting an information booth at community events (Ex. Ag Expo, Resource Fairs, etc.).
- g. Comment Forms

2024 – 2027 Title VI Program Public Engagement Process

The Ozark Foothills Regional Planning Commission will conduct a Public Engagement Process for the 2024-2027 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials will be

available to explain Title VI policies as well as provide education on how they relate to minority populations.

The Ozark Foothills Regional Planning Commission will provide periodic briefings to the Board of Directors and Executive Committee.

The Ozark Foothills Regional Planning Commission will conduct a 30-day public comment period to provide opportunities for feedback on the 2024-2027 Title VI Program.

Comments are accepted during the public outreach period via:

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

Three-Year Summary of Public Outreach Efforts

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

Title VI training provided to employees at Staff Meetings on the following dates; February 14, 2023 March 14, 2023 April 11, 2023 May 9, 2023 June 6, 2023 July 18, 2023 October 10, 2023 November 9, 2023 December 12, 2023 February 13, 2024
30-Day Public Comment Period April 10-May 10, 2024
Public Community Meeting held May 6, 2024
OFRPC Board of Directors Meeting June 13, 2024

G. Language Assistance Plan

Ozark Foothills Regional Planning Commission Limited English Proficiency Plan

This Limited English Proficiency (LEP) Plan has been prepared to address the Ozark Foothills Regional Planning Commission'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:

The Ozark Foothills Regional Planning Commission (OFRPC) was created in 1967 to assist in the promotion of the economic growth of five counties in Southeast Missouri: Butler, Carter, Reynolds, Ripley, and Wayne. The five-county region is midway between St. Louis, Missouri; Memphis, Tennessee; and Little Rock, Arkansas. St. Louis lies 160 miles northeast, with Memphis 160 miles to the south. Nestled within these counties are 16 municipalities: Bunker, Centerville, Doniphan, Ellington, Ellsinore, Fisk, Grandin, Greenville, Mill Spring, Naylor, Neelyville, Piedmont, Poplar Bluff, Qulin, Van Buren, and Williamsville.

The Ozark Foothills Regional Planning Commission 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 The Ozark Foothills Regional Planning Commission. 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, The Ozark Foothills Regional Planning Commission undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

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

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

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

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

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

Based on the 2022 5-Year American Community Survey data for Table C16001 for Ozark Foothills Regional Planning Commission’s service area consisting of Butler, Carter, Reynolds, Ripley, and Wayne counties, 70,012 persons Speak Only English of the total population five years of age and older of 71,118. A total of 212 Speak English “less than very well” of the total population or 0.3% of the population five years of age and older speak English “less than very well” – an accepted definition of “limited English proficiency.”

LEP Population in the Ozark Foothills Regional Planning Commission’s Service Area							
Population 5 years and over by language spoken at home and ability to speak English	Butler County	Carter County	Reynolds County	Ripley County	Wayne County	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over	39,587	4,975	5,817	10,161	10,578	71,118	94.7%
Speak English “less than very well”	189	0	3	7	13	212	0.3%

Spanish	518	38	30	5	55	646	0.9%
Speak English “less than very well”	72	0	1	5	13	91	0.13%
French, Haitian, or Cajun	25	0	1	3	33	62	>0.1%
Speak English “less than very well”	0	0	0	0	0	0	0%
German or West Germanic	133	0	7	26	12	178	0.25%
Speak English “less than very well”	85	0	0	0	0	85	0.12%
Korean	12	0	0	0	0	12	>0.1%
Speak English “less than very well”	12	0	0	0	0	12	>0.1%
Vietnamese	0	0	1	0	3	4	>0.1%
Speak English “less than very well”	0	0	1	0	0	0	>0.1%
Tagalog (inclu. Filipino)	9	0	0	31	0	40	>0.1%
Speak English “less than very well”	0	0	0	2	0	2	>0.1%
Other Asian and Pacific Island	20	6	4	47	0	77	.1%
Speak English “less than very well”	20	0	1	0	0	2172	>0.1%
All Other	12	0	0	13	0	25	>0.1%
Speak English “less than very well”	0	0	0	0	0	0	0%

2. Frequency of Contact by LEP Persons with the Ozark Foothills Regional Planning Commission’s Services:

Ozark Foothills Regional Planning Commission staff reviewed the frequency with which staff have, or could have, contact with LEP persons. To date, The Ozark Foothills Regional Planning Commission has never before had a request for an interpreter.

LEP Staff Survey Form	
<p>The Ozark Foothills Regional Planning Commission is studying the language assistance needs of its clients so that we can better communicate with them if needed.</p>	
<p>1. How often do you come into contact with people who do not speak English or have trouble understanding you when you speak English to them during the course of your job? DAILY WEEKLY MONTHLY LESS THAN MONTHLY</p>	
<p>2. What languages are spoken?</p>	
<p>3. What languages (other than English) do you understand or speak?</p>	
<p>4. Would you be willing to serve as a translator when needed?</p>	

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	0
Weekly	0
Monthly	0
Less frequently than monthly	Spanish, Mandarin

Language Assistance Requests Log

<u>Date</u>	<u>Language Spoken by Individual (If Available)</u>	<u>Name</u>	<u>Phone Number or Email (If Available)</u>	<u>Service(s) Requested</u>	<u>Staff Member Providing Aid</u>	<u>Notes and Follow-Up</u>

3. The importance of programs, activities or services provided by The Ozark Foothills Regional Planning Commission to LEP persons:

Outreach activities, summarized in The Ozark Foothills Regional Planning Commission’s Title VI Public Engagement Plan, include public meetings and specific 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 The Ozark Foothills Regional Planning Commission and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency (LEP) include:

1. Translators (with advance notice);
2. Language identification flashcards and/or “I speak” cards;
3. Written translations of vital documents (identified via safe harbor provision);
4. Website information; and,
5. To the extent feasible, assign bilingual staff for community events, public hearings, public Board of Directors meetings, and on phone lines.

As applicable: Based on demographic analysis (Factor 1), the Ozark Foothills Regional Planning Commission has determined that no language group(s) within its service area meet Safe Harbor criteria requiring written translated “vital documents” by language group(s). Should Factor 1 in the Four Factor analysis indicate in the future that an LEP group reaches the safe harbor threshold; Ozark Foothills Regional Planning Commission will evaluate its vital documents and provide translations

The Ozark Foothills Regional Planning Commission will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to Ozark Foothills Regional Planning Commission staff:

1. Information on the Ozark Foothills Regional Planning Commission Title VI Procedures and Title VI responsibilities pertaining to their specific duties.
2. Information on Ozark Foothills Regional Planning Commission’s Language Assistance Plan and LEP responsibilities.
3. Use of language identification flashcards such as “I Speak” Cards.
4. Documentation of language assistance requests by maintaining a Language Assistance Requests Log.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of the Ozark Foothills Regional Planning Commission’s Title VI Plan requirement.

The Ozark Foothills Regional Planning Commission will update the LEP plan as required. The plan will be reviewed and updated on a triennial basis, at minimum, or when it is clear that higher concentrations of LEP individuals are present in the Ozark Foothills Regional Planning Commission service area. Updates include the following:

1. How the needs of LEP persons have been addressed;
2. Determine the current LEP population in the service area;
3. Determine if the need for, and/or extent of, translation services has changed;
4. Determine if local language assistance programs have been effective and sufficient to meet the needs;
5. Determine whether the Ozark Foothills Regional Planning Commission's financial resources are sufficient to fund language assistance resources as needed;
6. Determine whether the Ozark Foothills Regional Planning Commission has fully complied with the goals of its LEP Plan.
7. Determine whether complaints have been received concerning the Ozark Foothills Regional Planning Commission's failure to meet the needs of LEP individuals.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American	Native American	Total
Board of Directors	97.5%				2.5%	100%
Executive Committee	100%					100%
Transportation Advisory Committee	100%					100%
Community Foundation	92.3%				7.7%	100%

Description of efforts made to encourage minority participation on committees:

- Direct solicitation of minority representatives to serve on advisory bodies
- Private sector component of Board of Directors includes two representatives for minorities.

I. Sub-Recipient Assistance

Sub-Recipient Assistance

The Ozark Foothills Regional Planning Commission does not have any sub-recipients.

J. Sub-Recipient Monitoring

Sub-Recipient Monitoring

The Ozark Foothills Regional Planning Commission does not have any sub-recipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when the Ozark Foothills Regional Planning Commission constructs facilities, such as storage facilities, maintenance facilities, or operations centers. The term “facilities” does not include bus shelters, transit stations, or power substations. The equity analysis will be conducted during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

The equity analysis is conducted to determine whether the location of the project will result in a disparate impact on minority communities on the basis of race, color, or national origin. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site.

Ozark Foothills Regional Planning Commission has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

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

Demographic data and mapping
*Guidance may be obtained from
either a Regional Planning
Commission or Metropolitan
Planning Organization.*

L. Fixed Route Transit Providers

The Ozark Foothills Regional Planning Commission is not a transit provider that operates fixed route service, or transit provider that operates fifty (50) or more fixed route vehicles in peak service and are in an urbanized size area with a population of 200,000 or more.

Thus, the requirements to set system-wide service standards and policies, collect and report demographic data, monitor transit service, and to evaluate service and fare changes, are not applicable to the Ozark Foothills Regional Planning Commission.

M. Attachments

Attachment 1 AGENCY INFORMATION

The Ozark Foothills Regional Planning Commission (OFRPC) was created in 1967 to assist in the promotion of the economic growth of five counties in Southeast Missouri: Butler, Carter, Reynolds, Ripley, and Wayne. Nestled within these counties are 16 municipalities: Bunker, Centerville, Doniphan, Ellington, Ellsinore, Fisk, Grandin, Greenville, Mill Spring, Naylor, Neelyville, Piedmont, Poplar Bluff, Qulin, Van Buren, and Williamsville.

The Ozark Foothills Regional Planning Commission is actively engaged in helping its members address community and economic development needs. The agency assists communities, not-for-profit corporations, and other political entities seek funding, develop strategies, and collaborate in meeting their respective challenges. Grant writing, grant administration, project development and financing, and bringing programs and agencies together are just a few of the services which the OFRPC community development and planning staff provide. The types of projects undertaken are unique and constantly evolving, reflective of the dynamics of the region. Projects range from affordable housing and water/sewer systems to community buildings and neighborhood revitalization.

The OFRPC administers the Ripley County Public Housing Authority. This PHA provides Section 8 rental assistance to 356 households in the five county region. The RCPHA also provides a Family Self-Sufficiency program to 50 households, a Homeownership assistance program to 20 households and a Shelter-Plus Care Program to 30 households.



The OFRPC also administers the Ozark Foothills Development Association. The OFDA is a not-for-profit development association that operates a six unit business incubator located in the Poplar Bluff Industrial Park.

The OFRPC operates the Ozark Foothills Recycling Center. This center offers recycling services to the region. Collection trailers are located in each of the five counties of the region to provide a local collection point for residents. The center also operates an institutional generator program that collects recyclables such as cardboard and office paper from businesses and school districts in the region. In addition to the recycling center, the OFRPC also administers the Solid Waste Management District Q which corresponds to the five county service area.

The Transportation Advisory Committee (TAC) is a committee of the OFRPC. The OFRPC conducts transportation planning through the TAC and produces a Regional Transportation Plan that is updated every two years and a Public Transit Human Services Transportation Coordination Plan that is updated every 5 years.

Attachment 2

OZARK FOOTHILLS RPC 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:

Executive Director
 Ozark Foothills Regional Planning Commission
 3019 Fair Street Poplar Bluff, MO 63901
 E-mail: info@ofrpc.org Fax: (573)-686-5467

PLEASE PRINT

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

Continued on next page

8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone: () -	
Address:		
City:	State:	Zip Code:

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

Signature and date is required:

Signature Date

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

Signature Date

If information is needed in another language, contact Ozark Foothills Regional Planning Commission at 573-785-6402 or at info@ofrpc.org.

Attachment 3

TITLE VI SELF-SURVEY FORM

Date filed with MoDOT Transit Section:

June 27, 2024

Survey Date: June 13, 2024

Period Covered: July 1, 2021 – June 30, 2024

Name of Program/Grant: *Annual Transportation Planning Program*

- A. Summary of Complaints: No complaints received.
- B. Number of complaints for the period: 0
- C. Number of complaints voluntarily resolved: N/A
- D. Number complaints currently unresolved: N/A
- 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)

Continued on next page

Distribution of Title VI Information

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.

Social media has been identified as a means of dissemination.

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

None needed at this time.

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

No problems encountered during the reporting period.

Signature: 

Title: Executive Director

Date: June 13, 2024