



## TITLE VI PROGRAM 2021

**Title VI Program**

**January 12, 2021**

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Lake of the Ozarks Council of Local Governments (LOCLG) used a template 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.

This template is available online, through a link at:

<http://www.modot.org/othertransportation/transit/transitapplicationsreportsprograms.htm>

Vs. December 2020

# Title VI Plan Table of Contents

A. Title VI Assurances .....	3
B. Agency Information .....	4
Mission of Lake of the Ozarks Council of Local Governments (LOCLG) .....	4
C. Notice to the Public .....	8
D. Procedure for Filing a Title VI Complaint .....	10
E. Monitoring Title VI Complaints, Investigations, Lawsuits.....	12
H. Advisory Bodies .....	22
I. Subrecipient Assistance .....	23
Attachment 1.....	24
LOCLG TITLE VI COMPLAINT FORM.....	24
Attachment 2.....	27
Title VI Self-Survey Form .....	27
Attachment 3.....	29
Coordination Implementation Strategy 2021.....	29
Regional Transportation Needs.....	29
General Population Characteristics .....	29
Poverty .....	29
Seniors.....	31
Disabled.....	31
Attachment 4.....	33
Board of Directors .....	33
Attachment 5 .....	34
Translated "Vital Documents" -Spanish .....	34
Aviso al público de los derechos bajo el título VI .....	34
Título VI denuncia procedimientos.....	35
Formulario de queja de Titulo VI.....	37

## A. Title VI Assurances

Lake of the Ozarks Council of Local Governments (LOCLG) 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.

LOCLG 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. LOCLG 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.

LOCLG meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including LOCLG and its third-party contractors by promoting actions that:

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

## B. Agency Information

### **Mission of Lake of the Ozarks Council of Local Governments (LOCLG)**

***Serving Camden, Laclede, Miller and Morgan counties, working together to help provide the necessary resources to help build strong communities within our region.***

The purpose of the Regional Planning Commission that serves the four counties of Camden, Laclede, Miller, and Morgan is to work with federal and state agencies; LOCLG provides coordination and technical support to local jurisdictions. With a wide variety of projects and support available, we offer our communities the expertise in areas of planning, grant writing, and technical assistance.

**Our goals:** Lake of the Ozarks Council of Local Governments has a number of State and Federal planning partners we work with on a regular basis to develop regional goals and priorities in regard to economic development, transportation planning, disaster and recovery planning and environmental planning.

#### **1. History**

In 1969, Lake of the Ozarks Council of Local Governments was commissioned by the State of Missouri as the Lake of the Ozarks regional planning commission. The region serves four counties of Camden, Laclede, Miller, and Morgan.

Regional Planning Commissions began to develop following the enactment of the State and Regional Planning and Community Development Act, adopted by the State Legislature in 1965. This act created the Missouri Department of Community Affairs and authorized the Governor to create regional planning commissions upon the petition of local governments (revised Statutes of Missouri, 1969, ed.).

Regional Planning Commission or Council of Local Governments is there to support their communities with planning, technical assistance and other activities as identified by the Board of Directors. Regional planning is designed to create an environment where communities can grow and expand successfully through the comprehensive planning of public safety, infrastructure, transportation, technical assistance, economic development, water and wastewater facilities, and environmental.

## **2. Regional Profile**

The LOCLG region encompasses four counties and 23 incorporated communities. The population within the LOCLG region is 119,178 according to the 2019 American Community Survey data. The region is a popular tourist site due to the Lake of the Ozarks. The area is mostly rural with several larger communities, including City of Camdenton, City of Eldon, City of Lake Ozark, City of Osage Beach, and City of Versailles. The popularity of the Lake of the Ozarks region is accentuated by its central location in Missouri, and that it is an equal distance from the state's largest population centers of St. Louis and Kansas City. Because of the unique ability to build at the water's edge and the availability of diverse activities, the Lake Area is projected to experience continued growth and development.

Between 2016 and 2019, US Census the region as whole grew by approximately 1.3%. Camden County experienced the highest amount of growth with 3.3%.

- Camden 3.3% increase
- Laclede 0.4% decrease
- Miller 0.1% increase
- Morgan 2.0% increase

## **3. Population served**

The LOCLG membership is available to the entirety of its four-county area and 23 communities. The LOCLG region has a total population of 119,178 according to the 2019 American Community Survey data. All four counties are active members, and their populations are served by LOCLG.

## **4. Service area**

LOCLG service area (map below) includes Camden, Laclede, Miller and Morgan Counties, and all the municipalities within those counties.



Figure 1: LOCLG Service Area Map

## 5. Governing body make-up

The bylaws of the Lake of the Ozarks Council of Local Governments Board establish that the counties be represented by the current Presiding Commissioner, and the communities of Camdenton, Eldon, Lebanon, Osage Beach, Lake Ozark and Versailles each have a seat on the Board (10) seats. As an Economic Development District, we have representation from the chambers and economic development interest on the Board (5) seats. Each of the small communities have caucus seats that are up for election each year with the small

communities sending representatives that will represent the interest of all the small communities (3) Board seats. There are also (3) Board seats that are for the business sector to have representation for the region.

LOCLG Board of Directors consists of 21 members. The current board make-up can be found in Attachment IV.



## C. Notice to the Public

### Notifying the Public of Rights under Title VI/ADA

Lake of the Ozarks Council of Local Governments (LOCLG) posts Title VI/ADA notices on our agency's website, and in public areas of our agency.

Lake of the Ozarks Council of Local Governments (LOCLG) 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.

Lake of the Ozarks Council of Local Governments (LOCLG) operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans and Disabilities Act of 1990.

For more information on LOCLG's Title VI program, and the procedures to file a complaint, please visit <http://www.loclg.org/> or contact us at the following:

**Mail: Linda Conner, Executive Director, LOCLG**  
**P.O. Box 3553**  
**Camdenton, MO 65020**  
**Telephone: (573) 346-5692**  
**Email: [linda.conner@loclg.org](mailto:linda.conner@loclg.org)**

If you believe you have been discriminated against based on race, color, or national origin by LOCLG, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact Linda Conner at (573)-346-5692 or email [linda.conner@loclg.org](mailto:linda.conner@loclg.org).

### How to file a Title VI/ADA complaint with LOCLG:

1. If you have trouble using a standard telephone and need TTY/TTD services, dial 7-1-1 to set up Missouri Relay communications; language assistance is available for persons with limited English proficiency.
2. In addition to the complaint process at LOCLG, A person may also file a Title VI/ADA complaint directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street Suite 404, Kansas City, Missouri 64106.

3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.
5. If information is needed in another language, contact (573)-346-5692.

## D. Procedure for Filing a Title VI Complaint

### Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of LOCLG programs, activities, and services.

**RIGHT TO FILE A COMPLAINT:** Any person who believes they have been discriminated against on the basis on race, color, or national origin by LOCLG 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 LOCLG Title VI Complaint Form at <http://www.loclg.org> or request a copy by writing to Lake of the Ozarks Council of Local Governments, P.O. Box 3553, Camdenton, MO 65020. Information on how to file a Title VI complaint may also be obtained by calling Linda Conner, Executive Director at (573) 346-5692.

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:  
Lake of the Ozarks Council of Local Governments  
P.O. Box 3335  
Camdenton, MO 65020

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

**INVESTIGATIONS:** LOCLG will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, LOCLG may contact the complainant. Unless a longer period is specified by LOCLG, the complainant will

have ten (10) days from the date of the letter to send requested information to the LOCLG investigator assigned to the case.

If the requested information is not received within that timeframe, the case will be closed. In addition, 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 LOCLG'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. LOCLG 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, LOCLG 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 Lake of the Ozarks Council of Local Governments (LOCLG) at P.O. Box 3553 Camdenton, Missouri 65020 or by calling (573) 346-5692.

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

**Agency Title VI Complaint Log**

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

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

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

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

## F. Public Engagement Plan

### Goal

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

#### Objectives

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

### Identification of Stakeholders

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

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency’s public engagement process. Advisory bodies provide insight and feedback to the agency.
- 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/Council 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, community centers, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

#### **3. Public Comment**

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

#### **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**

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

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

### **2021-2024 Title VI Program Public Engagement Process**

LOCLG will conduct a Public Engagement Process for the 2021-2024 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.

LOCLG will provide briefings to the Board of Directors and Advisory Bodies.

LOCLG will conduct a 30-day public comment period to provide opportunities for feedback on the 2021-2024 Title VI Program.

Comments are accepted during the public outreach period via:

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



### Summary of 2018-2020 Public Outreach Efforts

1. LOCLG provided monthly updates to the LOCLG Board of Directors on all transportation related activities and developments.
2. LOCLG provided bi- monthly updates to the LOCLG Transportation Advisory Committee (TAC) on all transportation related activities and developments.
3. LOCLG completed specific outreach and engagement during the development of the Human Services Transportation Plan during 2018.
4. Transportation information in regard to LOCLG planning and development efforts are published in our annual newsletter.
5. Transportation information in regard to LOCLG planning and development are posted on our website at <a href="http://www.loclg.org">www.loclg.org</a> .

## G. Language Assistance Plan

### **LOCLG Limited English Proficiency Plan**

This limited English Proficiency (LEP) Plan has been prepared to address LOCLG’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:**

LOCLG region consists of Camden, Laclede, Miller, and Morgan Counties.

LOCLG 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 LOCLG. 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, LOCLG 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 LOCLG service area are proficient in the English language. Based on 2019 5-year American Community Survey data, 0.8% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency.

<b>LEP Population in LOCLG Service Area</b>						
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Camden</b>	<b>Laclede</b>	<b>Miller</b>	<b>Morgan</b>	<b>Service Area Total</b>	<b>Percentage of Population 5 Years and Older</b>
<b>Population 5 Years and Over</b>	43,116	33,185	23,430	18,966	118,697	100.00%
Speak English "less than very well"	347	135	122	307	911	0.77%
<b>Spanish</b>						
Speak English "less than very well"	259	32	103	14	408	0.34%
<b>French, Haitian, or Cajun</b>						
Speak English "less than very well"	26	23	0	9	58	0.05%
<b>German</b>						
Speak English "less than very well"	11	0	0	204	215	0.18%
<b>Russian</b>						
Speak English "less than very well"	50	15	0	6	71	0.06%
<b>Indo-European</b>						
Speak English "less than very well"	0	0	0	0	0	0.00%
<b>Korean</b>						
Speak English "less than very well"	0	0	0	0	0	0.00%
<b>Chinese</b>						
Speak English "less than very well"	0	9	13	57	79	0.07%
<b>Vietnamese</b>						
Speak English "less than very well"	0	0	0	0	0	0.00%
<b>Tagalog</b>						
Speak English "less than very well"	0	40	0	0	40	0.03%
<b>Asian &amp; Pacific Island</b>						
Speak English "less than very well"	1	16	0	8	25	0.02%
<b>Arabic</b>						
Speak English "less than very well"	0	0	0	0	0	0.00%
<b>All Other</b>						
Speak English "less than very well"	0	0	0	0	0	0.00%

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

The LOCLG staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, LOCLG has, on average, zero requests for an interpreter. LOCLG averages zero phone calls per month.

LEP Staff Survey Form

LOCLG is studying the language assistance needs of its customers so that we can better communicate with them if needed.

1. How often encounter customers who do not speak English or have trouble understanding you when you speak English to them?

DAILY    WEEKLY    MONTHLY    LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

<b>Frequency of Contact with LEP Persons</b>	
<b>Frequency</b>	<b>Language Spoken by LEP Persons</b>
Daily	<b>0</b>
Weekly	<b>0</b>
Monthly	<b>0</b>
Less frequently than monthly	<b>0</b>

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

Outreach activities, summarized in LOCLG Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, community centers, 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?

4. The resources available to LOCLG 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) LOCLG has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

LOCLG will provide assistance and direction to LEP persons who request assistance.

### **Staff LEP Training**

**The following training will be provided to LOCLG staff:**

1. Information on LOCLG 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 LOCLG’s Title VI Plan requirement.**

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

## H. Advisory Bodies

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

<b>Committee</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Other</b>	<b>Total</b>
LOCLG Board	100%					100%
Transportation Advisory Committee	100%					100%

LOCLG policy is unlawful discrimination in any form is a serious offense that will not be tolerated. If any person believes that they are a victim of unlawful discrimination, they are encouraged to follow the State, Federal, and Title VI complaint processes.

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

- LOCLG Board members are elected officials, elected by the population in which they serve. These elected officials are members of the board based on their position within their community and or county.
- TAC members are appointed by the County Commission in which they serve; the counties go through a process of advertising and soliciting for members of these boards based on the experience and needs of the committee in regard to transportation.

LOCLG’s policy is unlawful discrimination in any form is a serious offence and will not be tolerated. If any person believes that they are a victim of unlawful discrimination, they are encouraged to follow the State, Federal and Title VI complaint process.

## **I. Subrecipient Assistance**

### **Subrecipient Assistance**

LOCLG does not have any subrecipients.

## **J. Subrecipient Monitoring**

### **Subrecipient Monitoring**

LOCLG does not have any subrecipients.



## Attachment 1

### Agency Information

Lake of the Ozarks Council of Local Governments (LOCLG) operates its programs and services without regard to race, color, or national origin in accordance with the Title VI of the Civil Rights Act. Any person who believes she or he has been subjected to any unlawful discriminatory practice under Title VI may file a complaint with LOCLG.

### LOCLG 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.”

Please mail or return this form to:

Linda Conner, Executive Director  
Lake of the Ozarks Council of Local Governments  
P.O. Box 3553  
Camdenton, MO 65020  
(573) 346-5692  
FAX: (573)346-9686

PRINT FORM ON NEXT TWO PAGES (2 PAGE FORM)

1. Complainant's Name:
a. Address:
b. City: State: Zip Code:
c. Telephone (include area code): Home: 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: Cell: Work:
e. Electronic mail (e-mail) address:
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO
5. What is your relationship to the person for whom you are filing the complaint?
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ( ) YES, I have permission. ( ) NO, I do not have permission.
7. I believe that the discrimination I experienced was based on (check all that apply): ( ) Race ( ) Color ( ) National Origin (classes protected by Title VI) ( ) Disability (class protected by ADA) ( ) Other (please specify)
8. Date of Alleged Discrimination (Month, Day, Year):
9. Where did the Alleged Discrimination take place?
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>
12. What type of corrective action would you like to see taken?

13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? ( ) YES If yes, check all that apply. ( ) NO

- a. ( ) Federal Agency (List agency's name)
- b. ( ) Federal Court (Please provide location)
- c. ( ) State Court
- d. ( ) State Agency (Specify Agency)
- e. ( ) County Court (Specify Court and County)
- f. ( ) Local Agency (Specify Agency)

14. If YES to question 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

**Attachment 2**

**Title VI Self-Survey Form**

Date filed with MoDOT Transit Section:

\_\_\_\_\_  
**DATE**

Survey Date:

Period Covered:

Name of Program/Grant:

- A. Summary of Complaints:
- B. Number of complaints for the period:
- C. Number of complaints voluntarily resolved:
- D. Number complaints currently unresolved:
- E. Attach a summary of any type of complaint and provide:
  - Name of complainant
  - Race
  - Allegation
  - Findings
  - Corrective Action
  - Identify any policy/procedure changes made as a result of the complaint.
  - Provide the date history (date complaint received through resolution)

**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.

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

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

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## **Attachment 3**

### **Coordination Implementation Strategy 2021**

#### **Lake of the Ozarks Council of Local Governments**

##### **Regional Transportation Needs**

To understand the needs of the LOCLG area it is important to understand the demographic makeup of the region and the stated needs of the people who use or provide transportation services in the area. This section provides an analysis of special needs populations and reviews public and provider input.

##### **Analysis of Special Needs Population**

Lake of the Ozarks Council of Local Governments is designed to address the transportation needs of elderly, low-income, and disabled residents in each respective region. While the public also uses public transportation, these key demographics are most impacted by access to transportation services. Without transportation services, these groups may have limited access to many basic amenities and services. This section includes graphic representations and analysis of low-income, elderly, and disabled populations in the LOCLG Region.

##### **General Population Characteristics**

Lake of the Ozarks Council of Local Governments encompasses four counties with an overall population of 119,178. The county populations are as follows: Camden 43,519; Laclede 33,164; Miller 23,544; Morgan 18,951.

##### **Poverty**

Low income is determined by the federal poverty guidelines, which are generated annually based on family size and composition. The numbers and percentages displayed below represent individuals living below poverty level. Low-income individuals and families may be more likely to seek public transportation or other transportation alternatives to automobiles. Portions of Camden, Laclede, Miller, and Morgan have block groups with significantly higher numbers of persons living below the poverty line. Statistics below depict the 2012 -2019 US Census data for percent of individuals living below the poverty level. Poverty has increased for each county.

Statistics below depict the 2012 US Census Data Households below the poverty line

- Camden County 13.9%
- Laclede County 18.5%
- Miller County 19.3%
- Morgan County 20.6%

Statistics below depict the 2019 US Census Data Households below the poverty line

- Camden County 14.8%
- Laclede County 15.0%
- Miller County 16.9%
- Morgan County 23.3%

Statistics below depict the 2012 Household Food Stamps/SNAP recipients

- Camden County 11.3%
- Laclede County 16.6%
- Miller County 18.4%
- Morgan County 15.9%

Statistics below depict the 2019 Household Food Stamps/SNAP recipients

- Camden County 9.2%
- Laclede County 13.4%
- Miller County 13.5%
- Morgan County 13.7%

There are many factors contributing to these rates and changes. According to the 2012 and 2019 ACS, there is a decrease of households below the poverty level of 1.5 percent about 13.4 percent of the U.S. population has income below the poverty level.

The Missouri State level depicts a decrease of households below the poverty level of 1.3 percent about 13.7 percent of the Missouri State population has income below the poverty level. This is similar to the U.S. figures.

## Seniors

In 2019, according to the US Census Bureau, the LOCLG region is home to 28,282 seniors over 65 years of age. This constituted a 20.2% increase in that demographic compared to the 2010 US Census. The group now represents 22.4% of the total population in the four-county region. This is above the Missouri average of 16.1%. All the LOCLG counties are above the Missouri State percentages for seniors over the age of 65.

- Camden County 27.7% an increase of 6%
- Laclede County 17.5% an increase of 1.9%
- Miller County 18.8% an increase of 3.1%
- Morgan County 23.4% an increase of 1.3%

The elderly population is expected to rise as the baby boomer generation retires. Therefore, meeting transportation needs for the elderly will become even more important.

## Disabled

The 2018 US Census reports 22,367 (18%) are considered disabled in the region.

Camden County has 8,627 (19%) of the population are considered to have some type of difficulties.

Hearing difficulty 6.4% an increase of 4.4% from 2012  
Vision difficulty 3.0% an increase of .6% from 2012  
Cognitive difficulty 7.7% an increase of 5.8% from 2012  
Ambulatory difficulty 10.7% an increase of 8.8% from 2012  
Self-care difficulty 3.5% an increase of 1.4% from 2012  
Independent living difficulty 8.4% an increase of 6.4% from 2012

Laclede County has 6,350 (18%) of the population are considered to have some type of difficulties.

Hearing difficulty 5.9% an increase of 2.2% from 2012  
Vision difficulty 3.5% a decrease of .4% from 2012  
Cognitive difficulty 7.4% an increase of 3.1% from 2012  
Ambulatory difficulty 10.3% an increase of 6.2% from 2012  
Self-care difficulty 3.7% a decrease of .4% from 2012  
Independent living difficulty 7.3% an increase of 2.7% from 2012



Miller County has 3,933 (16%) of the population are considered to have some type of difficulties.

Hearing difficulty 5.3% an increase of 1.5% from 2012  
Vision difficulty 3.0% a decrease of 1.1% from 2012  
Cognitive difficulty 5.2% an increase of 1.1% from 2012  
Ambulatory difficulty 8.9% an increase of 4.9% from 2012  
Self-care difficulty 2.5% a decrease of 1.5% from 2012  
Independent living difficulty 5.8% an increase of 2.1% from 2012

Morgan County has 3,457 (18%) of the population are considered to have some type of difficulties.

Hearing difficulty 5.7% an increase of 2.7% from 2012  
Vision difficulty 4.5% an increase of 1.1% from 2012  
Cognitive difficulty 6.6% an increase of 3.0% from 2012  
Ambulatory difficulty 8.6% an increase of 5.4% from 2012  
Self-care difficulty 2.9% a decrease of 0.3% from 2012  
Independent living difficulty 8.2% an increase of 5.1% from 2012

**Attachment 4**

**Board of Directors**

<b>County</b>	<b>Name</b>	<b>Position</b>
Camden County	Greg Hasty	Presiding Commissioner
Camden County	John Olivarri	Mayor, City of Osage Beach
Camden County	Trish Creach	Camdenton Area Chamber Executive Director
Camden County	Jeff Hooker	City of Camdenton City Administrator
Camden County	Bruce Mitchell	Private Representative Retired
Laclede County	Randy Angst	Presiding Commissioner
Laclede County	Darrell Pollock	Lebanon Chamber of Commerce
Laclede County	Chuck Jordon	Lebanon City Councilman
Miller County	Tom Wright	Presiding Commissioner
Miller County	Dave Van Dee	City of Lake Ozark City Administrator
Miller County	David Mitchem	City of Eldon City Administrator
Miller County	Jim Schlupp	Mayor, City of Iberia
Miller County	Edith Long	City of Iberia City Clerk
Miller County	K.C. Cloke	Lake Ozark Chamber Executive Director
Miller County	Jim Holcomb	Village of Four Seasons
Morgan County	Tony Stephens	Presiding Commissioner
Morgan County	Allen Kimberling	Mayor, City of Laurie
Morgan County	Joyce Chorpening	Private Representative Retired
Morgan County	Paul Hooper	Lake West Chamber Executive Director
Morgan County	Roger Corbin	City of Sunrise Beach

December 30, 2020

## Attachment 5

### Translated "Vital Documents" -Spanish

#### Aviso al público de los derechos bajo el título VI

Lake of the Ozarks Council of Local Governments (LOCLG) opera sus programas y servicios sin distinción de raza, color u origen nacional con arreglo al título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido sometido a cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con el LOCLG.

Para más información sobre el programa derechos civiles de LOCLG y los procedimientos para presentar una queja, por favor visite el sitio de web de LOCLG: [www.http://www.loclg.org/](http://www.loclg.org/) contacte a:

Dirección: Linda Conner-LOCLG  
34 Roofener Street  
Camdenton, MO 65020  
Teléfono: (573) 346-5692  
Dirección de correo electrónico  
: [linda.conner@loclg.org](mailto:linda.conner@loclg.org)

Si tiene problemas utilizando un teléfono normal y necesita servicios de TTY/TTD, marque 7-1-1 para establecer comunicaciones de Missouri Relay; ayuda con el idioma está disponible para las personas con dominio limitado del inglés.

Una persona también puede presentar una queja de título VI directamente con la Administración Federal de tránsito, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, D.C. 20590. Visite la página: [http://www.fta.dot.gov/civilrights/12328\\_5104.html](http://www.fta.dot.gov/civilrights/12328_5104.html) para obtener información sobre la presentación y un formulario de quejas de la Administración Federal de tránsito.

## **Título VI denuncia procedimientos**

Lake of the Ozarks Council of Local Governments (LOCLG) opera sus programas y servicios sin distinción de raza, color u origen nacional con arreglo al título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido sometido a cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con el LOCLG.

La traducción del aviso para el público derechos de bajo título VI se proporciona en el sitio web de LOCLG, [www.loclg.org](http://www.loclg.org) para español. Para otro ayuda con el idioma, por favor llame al (573) 346-5692 para hablar con un intérprete. Usted tiene el derecho de recibir ayuda con el idioma para acceder a servicios de LOCLG y documentos, libres de costo.

Los siguientes pasos describen los procedimientos para presentar una queja y cómo responderá el LOCLG.

1. Cualquier persona que cree que él o ella ha sido discriminado en base a raza, color, o nacionalidad de origen por LOCLG puede presentar una queja de título VI rellenando y enviando el formulario de reclamación de LOCLG título VI. LOCLG investigará denuncias recibidas no más de 180 días después del supuesto incidente. LOCLG procesará quejas completas.

2. El formulario de queja LOCLG título VI puede obtenerse mediante la descarga desde el sitio web de LOCLG [www.loclg.org](http://www.loclg.org) contactando a la oficina al (573)346-5692. Si tiene problemas utilizando un teléfono normal y necesitan servicios de TTY/TTD, marque 7-1- 1 para establecer comunicaciones de Missouri Relay; ayuda con el idioma está disponible para las personas con dominio limitado del inglés.

3. La queja debería ser enviado al siguiente dirección:

Dirección: Linda Conner Executive Director, LOCLG

34 Roofener Street

Camdenton, MO 65020

Teléfono

: (573) 346-5692

Dirección de correo electrónico: Linda Conner

4. Una vez que la denuncia ha sido recibido, el Director

Del LOCLG examinará para determinar si el LOCLG tiene jurisdicción. El querellante recibirán una carta de reconocimiento informándole si la queja será investigada por el LOCLG.

5. LOCLG tiene 90 días para investigar la denuncia. Si necesita más información para resolver el caso, el LOCLG puede comunicarse con el demandante. El querellante tiene 30 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no está contactado por el querellante o no recibe la información adicional

dentro de 30 días hábiles, LOCLG administrativamente puede cerrar el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir con su caso.

6. Después de que el investigador ha comentado sobre la queja, él/ella emitirá uno o dos cartas al demandante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resumiría las acusaciones y afirmarían que no hubo una violación del título VI y que el caso será cerrado. Un LOF resume las denuncias y las entrevistas sobre el presunto incidente y explica si cualquier acción disciplinaria, el entrenamiento adicional o cualquier otra acción ocurrirán. Si el demandante desea apelar la decisión, el/ella tendría 30 días después de la fecha de la carta de cierre. Una persona también puede presentar una queja de título VI directamente con la Administración Federal de tránsito, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, D.C. 20590. Visite la página:

[http://www.fta.dot.gov/civilrights/12328\\_5104.html](http://www.fta.dot.gov/civilrights/12328_5104.html) para obtener información sobre la presentación y un formulario de quejas de la Administración Federal de tránsito

## **Formulario de queja de Título VI**

Lake of the Ozarks Council of Local Governments opera sus programas y servicios sin distinción de raza, color u origen nacional según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido sometido a ninguna práctica discriminatoria ilegal bajo el título VI puede presentar una queja con el LOCLG. Traducción del título VI procedimientos de queja se proporciona en el sitio web de LOCLG [www.loclg.org](http://www.loclg.org). Si está información sea necesaria en otro idioma, por favor llame al (573)346-5692 para hablar con un intérprete. Usted tiene el derecho de recibir asistencia de idioma para acceder a los servicios de LOCLG to Con el fin de procesar su queja, por favor completa este formulario y enviarlo a la dirección del LOCLG que se encuentra al final de este formulario.

<b>Section I:</b>				
Nombre:				
Dirección:				
Teléfono (casa):			Teléfono (trabajo):	
Dirección de correo electrónico:				
¿Requisitos de formato accesible?	Impresión de gran tamaño		Audio Tap	
	TTY/TTD		Otros	
<b>Section II:</b>				
¿Usted está presentando esta queja en su nombre?			Si*	No
* Si usted contestó "Sí" a esta pregunta, ir a la sección III.				
Si no, por favor suministrar el nombre y la relación de la persona a quien usted se queja:				
Por favor explique por qué están presentando por un tercero:				
Por favor confirme que usted ha obtenido el permiso del partido discriminado si radicara en nombre de un tercero.			Si	No
<b>Section III:</b>				
Creo que experimentado la discriminación fue basada en (marque todas las apliquen) vivo:				
[ ] Raza				
[ ] Color				
[ ] Origen Nacional				
Fecha de la supuesta discriminación (mes, día, año):				

Explicar lo más claramente posible que pasó y por qué usted cree que fue(ron) discriminado(s). Describir a todas las personas que estuvieron involucradas. Incluir el nombre e información de contacto de la persona que discriminó (si lo conoce) así como nombres e información de contacto de testigos. Si se necesita más espacio, utilice el dorso de este formulario.

**Section IV**

¿Anteriormente usted ha presentado una queja del título VI con esta agencia?	Si	No
------------------------------------------------------------------------------	----	----

**Section V**

¿Usted ha presentado esta queja con cualquier otro Federal, estatal o local agencia o tribunal estatal o Federal?

Sí  No

Si la respuesta es sí, compruebe todas las que apliquen:

Federal]Agencia

Tribunal Federal]

Gobierno Agencia

Gobierno Tribunal

Autoridades Locales Agencia

Proporcione información sobre una persona de contacto at la Agencia/corte donde se presentó la queja:

Nombre:

Dirección:

Agencia:

Dirección:

Teléfono:

**Section VI**

Nombre de denuncia de la agencia es contra:

Contacte persona:

Título:

Teléfono: