

South Central Ozark Council of Governments  
(SCOCOG)

## **Title VI Program**

Date Approved and Adopted by  
SCOCOG Executive Board

***June 18<sup>th</sup>, 2024***

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### **Attachments**

Attachment 1 – Agency Information (Sample)

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## A. Title VI Assurances

The South Central Ozark Council of Governments Executive Committee 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 South Central Ozark Council of Governments Executive Committee 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 South Central Ozark Council of Governments Executive Committee 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 South Central Ozark Council of Governments Executive Committee meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including the South Central Ozark Council of Governments Executive Committee 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:

Chair Person  
\_\_\_\_\_

Date:

6/18/2024  
\_\_\_\_\_

## **B. Agency Information**

### **1. Mission of SCOCOG**

Our mission is to promote human resources, educational opportunities, and economic development in order to enhance the quality of life for the region's inhabitants. The organization strives to accomplish these objectives by:

- Providing professional staff assistance to local governments and organizations in the region.
- Serving as an advocate for the South Central Region before federal, state, and local government agencies and other organizations that influence or affect public policy.
- Promoting the economic development of the region.
- Providing a forum for the discussion and resolution of common problems and issues affecting the region.

### **2. History (including year started)**

On February 9, 1967, Governor Warren Hearnes designated the first Regional Planning Commission in Missouri the "South Central Ozarks Regional Planning Commission." 2024 marks the 57<sup>th</sup> year of service to the seven counties and 24 communities in the region, which was later named the South Central Ozarks Council of Governments. Through the years, SCORPC/SCOCOG has assisted the seven-county area with federal and state funded grant applications to address needs such as development of industrial parks, airports, county jails, housing rehabilitation projects, parks and recreation facilities, and other similar bricks and mortar type projects. Early on, housing assistance programs required housing stock inventories and required housing needs to be identified in order for communities to be eligible for different types of housing programs for low income families, thus planning for those type of programs began. Community infrastructure needs had to be identified to be eligible for community facilities funding approvals.

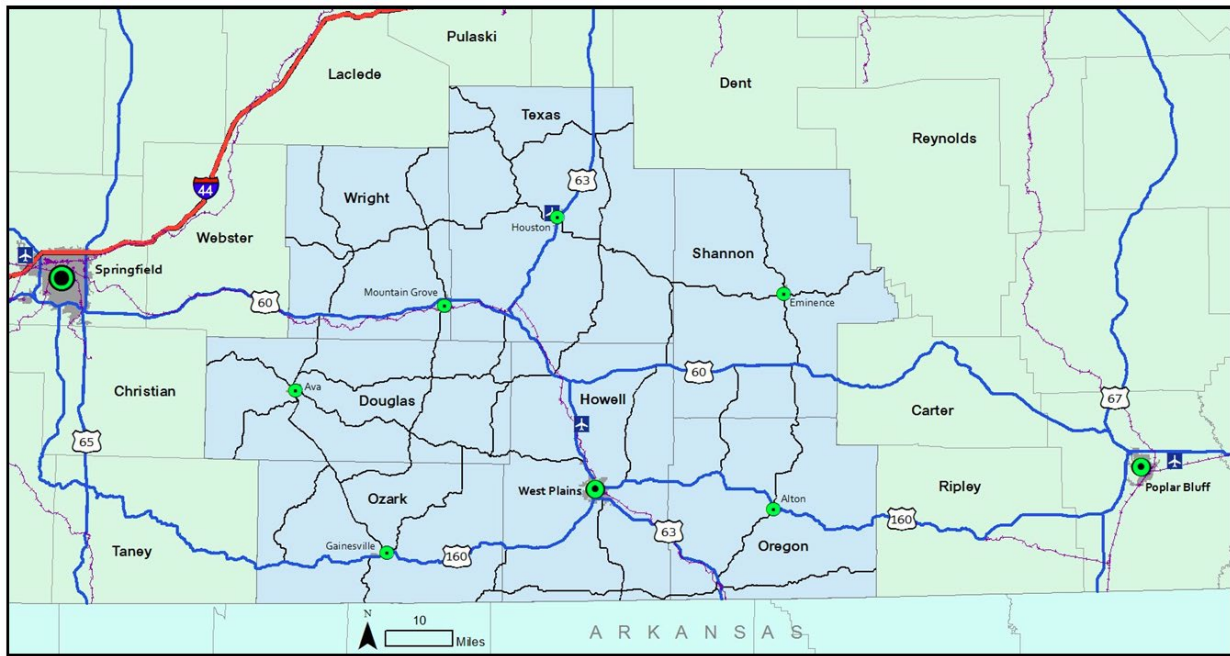
### **3. Regional Profile (regional population; growth projection)**

The South Central Ozark Council of Governments service area is comprised of seven mostly rural southern Missouri counties: Douglas, Howell, Oregon, Ozark, Shannon, Texas and Wright. The region contains the state's three largest counties in terms of size: Texas 1,179 sq. mi., Shannon 1,004 sq. mi., and Howell 928 sq. mi. The region includes 23 incorporated communities, all with a population of less than 14,000 residents. Unlike, most remote rural regions the last 30 years of census data shows that the south central Missouri region has experienced population growth—but at a slower rate than at state and national levels. Howell, the region's most populous county is also the fastest growing county. Current census population projections through 2030 show a similar anticipated population growth rate in all but two counties: Ozark and Texas.

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

The “South Central” Missouri Ozarks is comprised of seven counties; the southernmost three counties share a border with the State of Arkansas. The region contains the three largest counties in the state in terms of size: Texas County, 1,179 square miles, Shannon County, 1,004 square miles, and Howell County, 928 square miles. The majority of the region’s population resides in cities located along the two local major transportation routes: U.S. Highways 60 and 63. The largest community is the City of West Plains in Howell County with an estimated 2020 population estimate of 12,184. The nearest metropolitan area is the Springfield Metropolitan Statistical Area (MSA) which has an estimated 2020 population of 475,432. Springfield is located approximately 40 miles from the western border of Wright County on U.S. Highway 60.

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



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

*Mayors and Presiding Commissioners shall retain their positions as Council members under this section only so long as they shall hold the required office in their respective government. Upon replacement in office, the newly elected official or his designee shall assume membership with the Council.*

**SCOCOG EDD Board Membership Roster**  
*Revised 3-2021*

**1. GOVERNMENT REPRESENTATIVES (51-65%) 25 – 32 Members Thirty-One (31) Government Representatives, which equals 58% (rounded).** *Elected officials and/or employees of a general-purpose unit of state, local or Indian tribal government who have been appointed to represent the local unit of government*

|   | Name               | Government     | Position               | Count |
|---|--------------------|----------------|------------------------|-------|
| 1 | Rodney Clouse      | Douglas County | Presiding Commissioner | 1     |
| 2 | Ralph Riggs        | Howell County  | Presiding Commissioner | 2     |
| 3 | David Stubblefield | Oregon County  | Presiding Commissioner | 3     |
| 4 | Terry Newton       | Ozark County   | Presiding Commissioner | 4     |
| 5 | Beth Stewart-Long  | Shannon County | Presiding Commissioner | 5     |

|    |   |                         |                                  |    |
|----|---|-------------------------|----------------------------------|----|
| 6  | Scott Long                                | Texas County            | Presiding Commissioner           | 6  |
| 7  | Zachary Williams                          | Wright County           | Presiding Commissioner           | 7  |
| 8  | David Norman                              | City of Ava             | Mayor                            | 8  |
| 9  | Linda Bunch                               | City of Brandsville     | Mayor                            | 9  |
| 10 | John Krasuski                             | City of Mountain View   | Mayor                            | 10 |
| 11 | Mike Topliff                              | City of West Plains     | Mayor                            | 11 |
| 12 | Brooke Fair                               | City of Willow Springs  | Mayor                            | 12 |
| 13 | Paul Haddock                              | City of Alton           | Mayor                            | 13 |
| 14 | Mark Sanders                              | City of Koshkonong      | Mayor                            | 14 |
| 15 | Ken Cotham                                | City of Thayer          | Mayor                            | 15 |
| 16 | Tony Johnson                              | Village of Bakersfield  | Mayor                            | 16 |
| 17 | Deanna Gail Reich                         | City of Gainesville     | Mayor                            | 17 |
| 18 | Julie Rothenberg                          | Village of Theodosia    | Chairman of the Board,<br>ProTem | 18 |
| 19 | Louis Colaianne                           | City of Birch Tree      | Mayor                            | 19 |
| 20 | Margie Cleary                             | City of Eminence        | Mayor                            | 20 |
| 21 | Dino Romeo                                | City of Winona          | Mayor                            | 21 |
| 22 | Danny Cannon                              | City of Cabool          | Mayor                            | 22 |
| 23 | Victoria Naranchich                       | City of Houston         | Mayor                            | 23 |
| 24 | Keith Cantrell                            | City of Licking         | Mayor                            | 24 |
| 25 | Justin Copley*                            | Village of Plato        | Chairman of the Board            | 25 |
| 26 | Gene DeWitt                               | Village of Raymondville | Chairman of the Board            | 26 |
| 27 | Chris Bryant                              | City of Summersville    | Mayor                            | 27 |
| 28 | Jessica Vandergrift                       | City of Hartville       | Mayor                            | 28 |
| 29 | Amanda Moody                              | City of Mansfield       | Mayor                            | 29 |
| 30 | Fred VanBibber                            | City of Mountain Grove  | Mayor                            | 30 |
| 31 | Steven Jarrett                            | City of Norwood         | Mayor                            | 31 |
|    | * Tony Floyd appointed to represent Plato |                         |                                  |    |

**2. NON-GOVERNMENT REPRESENTATIVES (35-49%) 17 – 24 Members** Eighteen (18) Private and or Stakeholder sector reps, which equal 34% (rounded)

**A. Private Sector Representatives:** Any senior management official or executive holding a key decision-making position, with respect to any for-profit enterprise. (At least one required)

|    | Name             | Company / Enterprise            | Position             | Count |
|----|------------------|---------------------------------|----------------------|-------|
| 1  | Randall Combs    | Alton Bank                      | President            | 32    |
| 2  | Gary Collins     | Gary Collins Farms              | Owner                | 33    |
| 3  | John Casey       | Cabool Lock & Store Storage     | Owner                | 34    |
| 4  | Mike Sherman     | Mike Sherman Farms              | Owner                | 35    |
| 5  | Wes Parks        | CAPS Plus Embroidery            | Owner                | 36    |
| 6  | Craig Cunningham | Cunningham Construction         | Owner                | 37    |
| 7  | Gus Ramseur      | Community First Banking Company | VP/Commercial Lender | 38    |
| 8  | Darlene Sorensen | MasterWorks Custom Home Design  | Owner                | 39    |
| 9  | Todd Shanks      | Ozark Heritage Welcome Center   | Director             | 40    |
| 10 | Herman Kelly     | Kelly's Auto Body               | Owner                | 41    |
| 11 | Dale Counts      | Canoe Rental Business           | Owner                | 42    |
| 12 | Scott Cecil      | State Farm Insurance            | Agent                | 43    |
| 13 | Reid Grigsby     | BÜRO Office Supply              | Owner                | 44    |

|    |               |                           |       |    |
|----|---------------|---------------------------|-------|----|
| 14 | Lawson Curtis | Woods and Water Taxidermy | Owner | 45 |
| 15 | Chris Degase  | Degase Farms              | Owner | 46 |

**B. Stakeholder Organization Representatives:** *Executive directors of chambers of commerce, or representatives of institutions of post-secondary education, workforce development groups or labor groups. (At least one required)*

|    | Name         | Organization                             | Position           | Count |
|----|--------------|--|--------------------|-------|
| 16 | Judy Shields | Ava Chamber of Commerce                  | Executive Director | 47    |
| 17 | Josh Cotter  | South Central Career Center              | Director           | 48    |
| 18 | Jody James   | South Central Workforce Investment Board | Executive Director | 49    |

**3. AT-LARGE REPRESENTATIVES (0-14%) 0 – 7 Members Four (4) At-Large members, which equals 8% (rounded).**  
*Other individuals who represent the principal economic interests of the region (No minimum required)*

|   | Name               | Organization  | Position      | Count |
|---|--------------------|---|---------------|-------|
| 1 | Randy Pamperien    | Transportation  | Retired MoDOT | 50    |
| 2 | Dick Salgado       | Economic Development Committee / Ava Area Chamber of Commerce | Chairman      | 51    |
| 3 | Shelly Bland       | Shannon County  | Clerk         | 52    |
| 4 | Kathleen Morrissey | Retired MSU / West Plains Council on the Arts                 | Volunteer     | 53    |

**Total membership count**

**53**

**Membership Statistics**

|  | <u>Number</u> | <u>Percent</u> |
|--|---------------|----------------|
| 1. Government Representatives (51-65%)                   | 31            | 58%            |
| 2. Non- Government Representatives (35-49%)              | 18            | 34%            |
| A. Private Sector Representatives (at least 1)           | 15            | -              |
| B. Stakeholder Organization Representatives (at least 1) | 3             | -              |
| 3. At-Large Representatives (0-14%)                      | 4             | 8%             |
| <b>Total Board Membership</b>                            | <b>53</b>     | <b>100%</b>    |

### **C. Notice to the Public**

#### **Notifying the Public of Rights under Title VI**

SCOCOG posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

SCOCOG 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.

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

#### **How to file a Title VI complaint with SCOCOG:**

1. A Complaint Form is available on our website at [www.scocog.org](http://www.scocog.org). Print form and mail to SCOCOG, Attn: Executive Director, P O Box 100, Pomona, MO 65789 or by calling 417-256-4226.
2. In addition to the complaint process at SCOCOG, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street, Kansas City, MO 64106 or by calling 816-329-3920.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.

If information is needed in another language, 417-256-4226.



## D. Procedure for Filing a Title VI Complaint

### Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of SCOCOG'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 SCOCOG 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 SCOCOG Title VI Complaint Form at [www.scocog.org](http://www.scocog.org) or request a copy by writing to SCOCOG, P.O Box 100, Pomona, Missouri, 65789. Information on how to file a Title VI complaint may also be obtained by calling the Executive Director at 417-256-4226.

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 SCOCOG, P.O Box 100, Pomona, Missouri, 65789.

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

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

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with SCOCOG'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. SCOCOG 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, SCOCOG 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 SCOCOG, P O Box 100, Pomona, MO 65789, or at 417-256-4226.

**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 SCOCOG’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**

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

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

## F. Public Engagement Plan

### Goal

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

#### Objectives

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

### Identification of Stakeholders

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

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

### **3. Public Comment**

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

SCOCOG ensures all outreach strategies, communications and public involvement efforts comply with Title VI. SCOCOG’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, SCOCOG 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.

### **Title VI Program Public Engagement Process**

SCOCOG will conduct a Public Engagement Process for the 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.

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

SCOCOG will conduct a 30 day public comment period to provide opportunities for feedback on the Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

### **Summary of 2024 Public Outreach Efforts**

|  |
|--|
|  |
|  |
|  |
|  |
|  |

## G. Language Assistance Plan

### SCOCOG's Limited English Proficiency Plan

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

SCOCOG serves a seven county region of Missouri consisting of Douglas, Howell, Oregon, Ozark, Shannon, Texas, and Wright counties. Located within the seven county region are 23 incorporated communities—the largest being the City of West Plains (population 12,184) and the smallest being the Village of Plato (population 85).

SCOCOG 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 SCOCOG. 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, SCOCOG 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 SCOCOG service area are proficient in the English language. Based on 2020 Census data, .98% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

| LEP Population in SCOCOG Service Area   |                |               |               |              |                |               |               |  |
|---|----------------|---------------|---------------|--------------|----------------|---------------|---------------|--|
| Population 5 years and over by language spoken at home and ability to speak English | Douglas County | Howell County | Oregon County | Ozark County | Shannon County | Texas County  | Wright County | Percentage of Population 5 Years and Older |
| <b>Population 5 Years and Over</b>  | <b>12,551</b>  | <b>37,495</b> | <b>9,958</b>  | <b>8,750</b> | <b>7,715</b>   | <b>24,092</b> | <b>16,978</b> | <b>97.30%</b>                              |
| Speak English "less than very well"   | 216            | 248           | 5             | 70           | 9              | 149           | 493           | 33.84%                                     |
| <b>Spanish</b>  | <b>251</b>     | <b>352</b>    | <b>102</b>    | <b>74</b>    | <b>66</b>      | <b>159</b>    | <b>40</b>     | <b>92.85%</b>                              |
| Speak English "less than very well"   | 216            | 35            | 5             | 0            | 9              | 39            | 11            | 23.78%                                     |
| <b>Other Indo-European</b>  | <b>11</b>      | <b>545</b>    | <b>44</b>     | <b>2</b>     | <b>7</b>       | <b>369</b>    | <b>847</b>    | <b>1.22%</b>                               |
| Speak English "less than very well"   | 0              | 199           | 0             | 0            | 0              | 0             | 482           | 13.34%                                     |
| <b>Asian and Pacific Island</b>   | <b>0</b>       | <b>32</b>     | <b>25</b>     | <b>70</b>    | <b>0</b>       | <b>326</b>    | <b>42</b>     | <b>.4%</b>                                 |
| Speak English "less than very well"   | 0              | 0             | 0             | 70           | 0              | 109           | 0             | 19.05%                                     |
| <b>All Other</b>  | <b>0</b>       | <b>14</b>     | <b>34</b>     | <b>0</b>     | <b>27</b>      | <b>24</b>     | <b>21</b>     | <b>11.42%</b>                              |
| Speak English "less than very well"   | 0              | 14            | 0             | 0            | 0              | 1             | 0             | 14.88%                                     |

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

The SCOCOG staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, SCOCOG has, on average, no need for an interpreter. SCOCOG averages zero phone calls per month.

| LEP Staff Survey Form   |
|---|
| <p>SCOCOG is studying the language assistance needs of its riders so that we can better communicate with them if needed.</p> <ol style="list-style-type: none"> <li>How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?<br/>DAILY WEEKLY MONTHLY LESS THAN MONTHLY</li> <li>What languages do these passengers speak?</li> <li>What languages (other than English) do you understand or speak?</li> <li>Would you be willing to serve as a translator when needed?</li> </ol> |



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

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

Outreach activities, summarized in SCOCOG’s Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

| Outside Organization LEP Survey   |
|---|
| <p>Organization: SCOCOG</p> <ol style="list-style-type: none"> <li>1. What language assistance needs are encountered?</li> <li>2. What languages are spoken by persons with language assistance needs?</li> <li>3. What language assistance efforts are you undertaking to assist persons with language assistance needs?</li> <li>4. When necessary, can we use these services?</li> </ol> |

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

Strategies for Engaging Individuals with Limited English Proficiency may 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) SCOCOG has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

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

## **Staff LEP Training**

The following training will be provided to SCOCOG staff:

1. Information on SCOCOG's Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

## **Monitoring and Updating the LEP Plan**

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

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

## H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

| <b>Committee [examples]</b> | <b>Caucasian</b> | <b>Latino</b> | <b>African American</b> | <b>Asian American</b> |  | <b>Total</b> |
|-----------------------------|------------------|---------------|-------------------------|-----------------------|--|--------------|
| EDD Board Members           | 53               |               |                         |                       |  | 100%         |
|                             |                  |               |                         |                       |  |              |
|                             |                  |               |                         |                       |  |              |

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

- Individuals may come to SCOCOG wanting to serve
- Board Members may ask those in the community to serve
- Recommendations from the General Public
- Employees network within the community to attract potential board members
- Meetings are advertised publically through social media, website, etc.

## I. Equity Analysis of Facilities

### OPTION A

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

#### **Demographic data and mapping**

*SCOCOG only has one location, located at 4407 County Road 2340, Pomona, Mo 65789*

Regarding the location of applicable projects, no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

**L. System-Wide Service Standards and Policies\***

*\*applies to all fixed route providers (including those that do not meet volume threshold)*

**Template for System-Wide Service Standards (1. 2. 3. 4.)  
is presented in detail  
in FTA Circular 4702.1B Appendix G.**

**Template for System-Wide Service Policies (1. 2.)  
is presented in detail  
in FTA Circular 4702.1b Appendix H.**

NOTE: Template for **Major Service Change and Impact Policies**  
is located at O. Service and Fare Equity Analysis.

**M. Requirement to Collect and Report Demographic Data\***

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and  
200,000+ population.***

**Template for Demographic Profile and Travel Patterns  
is presented in detail  
in FTA Circular 4702.1B Appendix I.**

**N. Requirement to Monitor Transit Service\***

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and  
200,000+ population.***

**Template for Demographic Profile and Travel Patterns  
is presented in detail  
in FTA Circular 4702.1B Appendix J.**

**O. Service and Fare Equity Analysis\***

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and  
200,000+ population.***

**Major Service Change and Impact Policies**



**Template for Service and Fare Equity Analysis  
is presented in detail  
in FTA Circular 4702.1B Appendix K.**

## Attachment 1

### Agency Information

The South Central Ozark Council of Governments (SCOCOG) serves a seven county region of Missouri consisting of Douglas, Howell, Oregon, Ozark, Shannon, Texas, and Wright counties. Located within the seven county region are 24 incorporated communities—the largest being the City of West Plains (population 12,184) and the smallest being the Village of Plato (population 85). The South Central Ozark

Council of Governments is organized exclusively for charitable, educational, or scientific purposes within the meaning of section 501c3 of the Internal Revenue Code. The mission of the South Central Ozark Council of Governments is to promote human resources, educational opportunities, and economic development in order to enhance the quality of life for the region's inhabitants. The organization strives to accomplish these objectives by: providing professional staff assistance to local governments and organizations in the region, serving as an advocate for the South Central Ozark Region before federal, state, and local government agencies and other organizations that influence or affect public policy, promoting the economic development of the region and providing a forum for the discussion and resolution of common problems and issues affecting the region.

The primary emphasis of the South Central Ozark Council of Governments has always been to preserve and improve the quality of life within the South Central Missouri area; and the direction of Council activity continues to address economic development and community development, while maintaining the original concept of regional cooperation and coordination and efficient use of resources. Under the direction of the Executive Director, the staff of SCOCOG provides assistance to the local communities, counties, federal agencies, the private sector, and other entities in such areas as infrastructure development, business development, recreation, solid waste management, emergency planning, transportation planning, and expansion resulting in job creation and/or retention.

SCOCOG serves 118,222 residents, population is based on 2020 Census Data.



SCOCOG is administered by a Board consisting of governmental and non-governmental representatives. Its Executive Board consists of the presiding commissioners from the seven county region.

**Attachment 2**  
**SCOCOG TITLE VI COMPLAINT FORM**

“No person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Executive Director  
SCOCOG  
P O Box 100  
Pomona, Mo 65789  
mail@scocog.org  
417-256-6188 (fax)

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.<br>( ) 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

TITLE VI COMPLAINT FORM – PAGE 2

|   |
|---|
| 8. Date of Alleged Discrimination (Month, Day, Year):   |
| 9. Where did the Alleged Discrimination take place?   |
| 10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <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<br>a. ( ) Federal Agency (List agency's name)<br>b. ( ) Federal Court (Please provide location)<br>c. ( ) State Court<br>d. ( ) State Agency (Specify Agency)<br>e. ( ) County Court (Specify Court and County)<br>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 3

## Title VI Self-Survey Form

Date filed with MoDOT Transit

Section: May 20<sup>th</sup>, 2024

Survey Date: April 20<sup>th</sup>, 2024

Period Covered: CY2027

Name of Program/Grant: MoDOT – SCOCOG Planning Partner Transportation Work Program

- A. Summary of Complaints: None received
- B. Number of complaints for the period: None Received
- C. Number of complaints voluntarily resolved: N/A
- D. Number complaints currently unresolved: None
- E. Attach a summary of any type of complaint and provide: None Received
  - 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

Title VI Self-Survey Form – Page 2

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. None

6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants. None at this time.

7. Identify any problems encountered with Title VI compliance, and discuss possible remedies. None identified at this time.

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

Title: SCOCOG Executive Director

Date: 5/20/2024