



## **FY 2014-2017 Title VI Program**

**Cape Girardeau – Jackson Urbanized Area**

**Adopted**

**September 16, 2015**

**Filed with MoDOT Transit Section**

**\_\_\_\_\_, 2015**

Southeast Metropolitan Planning Organization  
C/O City of Cape Girardeau Development Services Department  
401 Independence Street, Cape Girardeau, Missouri 63703  
Phone: (573) 339-6327 Fax: (573) 339-6303

[www.southeastmpo.org](http://www.southeastmpo.org)

**SEMPO**  
**2014-2017 Title VI Program**  
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## **A. Agency Information**

### **1. Mission**

The Southeast Metropolitan Planning Organization (SEMPO) is a federally mandated and funded policy-making organization that oversees transportation planning for the Cape Girardeau – Jackson urbanized area. It is charged with developing and implementing a continuing, cooperative, and comprehensive transportation planning process.

### **2. History**

SEMPO was officially designated a Metropolitan Planning Organization (MPO) by the Governor of Missouri on March 12, 2013 and by the Governor of Illinois on February 7, 2013. Since that time, the organization has been developing and adopting its initial documents. On August 21, 2013, the Board of Directors adopted the FY 2014 Unified Planning Work Program (UPWP) and the FY 2014-2017 Interim Transportation Improvement Plan (TIP). SEMPO is currently in the early stages of developing its Metropolitan Transportation Plan (MTP).

### **3. Regional Profile**

The Cape Girardeau – Jackson urbanized area has 35.03 square miles of land area and 0.07 square miles of surface water area. As of 2010, the population was 52,900, and 287,244 people lived within a 40-mile radius of Cape Girardeau County (based on U.S. Census data).

### **4. Population Served**

Today, SEMPO serves a population of 53,258 (projection based on 2010 U.S. Census and 2012 American Community Survey data). Because the Cape Girardeau – Jackson urbanized area is a regional center for business, health care, education, and commerce, the daytime population is estimated to be significantly higher.

### **5. Service Area**

See Attachment 1 for a map of the SEMPO planning (service) area. The boundary covers an area that includes the City of Cape Girardeau, the City of Jackson, and parts of Cape Girardeau County and Scott County in Missouri, as well as the Village of East Cape Girardeau and part of Alexander County in Illinois. Major transportation routes include Interstate 55, US Highway 61, Missouri State Highway 74/Illinois State Highway 146, and the Mississippi River. This area is also served by a railroad mainline (operated by BNSF) and a regional airport (operated by the City of Cape Girardeau). Transit services are provided by the Cape Girardeau County Transit Authority as well as Southeast Missouri State University.

## **6. Governing Body**

SEMPO is governed by a Board of Directors. Members serve 2-year terms and may be re-appointed. There are 7 voting members: 2 members from the City of Cape Girardeau, 2 members from the City of Jackson, and 1 member each from Cape Girardeau County, the Southeast Missouri Regional Planning and Economic Development Commission, and the Cape Girardeau County Transit Authority/Southeast Missouri State University Transit. In addition, there are several ex-officio members representing other jurisdictions and transportation agencies. The Board is aided by a Technical Planning Committee, which serves in an advisory capacity and consists of staff from the Federal Highway Administration, Federal Transit Administration, Missouri Department of Transportation, Illinois Department of Transportation, Southeast Missouri and Bootheel regional planning commissions, Southeast Missouri Regional Port Authority, regional transit agencies, and local representatives. Staff support is provided by the City of Cape Girardeau.

## **B. Notice to the Public**

### **Notice to the Public of Rights under Title VI**

The Southeast Metropolitan Planning Organization (SEMPO) posts Title VI notices on our agency's website and in public areas of our agency.

SEMPO 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 SEMPO, you may file a Title VI complaint as follows:

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

1. Obtain a **Title VI Complaint Form**, available on the SEMPO website at [www.southeastmpo.org](http://www.southeastmpo.org), or request a printed copy from the SEMPO Executive Director's Office, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6327 phone; (573) 339-6303 fax.
2. In addition to the complaint process at SEMPO, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory action(s) 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.

**To request additional information on SEMPO's nondiscrimination obligations or if information is needed in another language, contact the SEMPO Executive Director, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6327 phone; (573) 339-6303 fax.**

### C. Procedure for Filing a Title VI Complaint

The following complaint procedures apply to the beneficiaries of SEMPO'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 SEMPO may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received using this form within one hundred eighty (180) days of the alleged discriminatory action(s).

**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.

Obtain a **Title VI Complaint Form (Attachment 2)**, available on the SEMPO website at [www.southeastmpo.org](http://www.southeastmpo.org), or request a printed copy from the SEMPO Executive Director's Office, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6327 phone; (573) 339-6303 fax.

Complaints must be filed within one hundred eighty (180) days following the date of the alleged discriminatory action(s) and should contain as much detailed information about the alleged discrimination as possible. At a minimum, the following information should be provided:

- Complainant's full name, address and telephone number.
- Specific, detailed information about the alleged discriminatory action(s) (what, when, how, etc.)
- Any other relevant information, including the names of any persons, if known, the agency should contact for verification of the allegations.

The complaint form must be submitted to: **SEMPO Executive Director's Office, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6303 fax.**

**COMPLAINT ACCEPTANCE:** SEMPO will only process complaints that are completed using the complaint form and submitted within the one hundred eighty (180) day period. Upon receipt of a completed and timely complaint form, the SEMPO Executive Director will review it to determine if SEMPO has jurisdiction. If the Executive Director is alleged to have been involved in the discriminatory action(s), the complaint form will be reviewed by a member of SEMPO who is not alleged to have been involved or, if necessary, a designated third party. The complainant will receive an acknowledgement letter from the reviewing party informing them whether or not the complaint will be investigated.

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

by the reviewing party, the complainant will have ten (10) days to provide the requested information.

If the requested information is not received within the specified period, the case will be closed. The case may also be closed if the complainant submits a signed written request to withdraw the complaint.

LETTER OF CLOSURE OR FINDING: Upon completion of the investigation, the reviewing party will issue either a Letter of Closure (LOC) or a Letter of Finding (LOF).

A Letter of Closure (LOC) 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 the reviewing party's determination, the complainant may request reconsideration by submitting the request in writing to the reviewing party within seven (7) days after the date of the Letter of Closure or Letter of Finding, stating with specificity the basis for the reconsideration. The reviewing party will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the reviewing party will issue a determination letter to the complainant upon completion of the reconsideration review.

In addition to filing a Title VI complaint with SEMPO, a person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

To request additional information on SEMPO's nondiscrimination obligations or if information is needed in another language, contact the SEMPO Executive Director, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6327 phone; (573) 339-6303 fax.

## **D. 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 SEMPO'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. A sample log sheet is below. To date, SEMPO has never received a Title VI complaint.

### **Agency Title VI Complaint Log**

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

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

SEMPO's staff is given Title VI training, and SEMPO 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?



## **E. 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 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:
  - Online comment form
  - Email
  - Mail
  - Phone
  - In person

### **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**

SEMPO ensures all outreach strategies, communications and public involvement efforts comply with Title VI. SEMPO'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, SEMPO 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 persons with limited English proficiency (LEP). Upon advance notice, translators may be provided.

### **2014 – 2017 Title VI Program Public Engagement Process**

SEMPO held two public outreach meetings (one in Jackson and one in Cape Girardeau) on March 14, 2014, to explain the Title VI Program and to obtain comments. Advance notice of the meetings was posted on SEMPO's website. In addition, a press release was issued. SEMPO also directly contacted various stakeholder groups, including those representing minorities and low income households, to encourage participation. The Title VI Program was reviewed by the Technical Planning Committee and the Board of Directors; both meetings were open to the public and advance notice was given in accordance with the Missouri Sunshine Law. A public comment period was held prior to adoption of the Title VI Program in accordance with SEMPO's Public Participation Plan.

## **F. Language Assistance Plan**

### **SEMPO Limited English Proficiency (LEP) Plan**

This limited English proficiency (LEP) Plan has been prepared to address SEMPO'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:**

SEMPO serves an area that includes the City of Cape Girardeau, the City of Jackson, and parts of Cape Girardeau County and Scott County in Missouri, as well as the Village of East Cape Girardeau and part of Alexander County in Illinois. See Attachment 1 for a map of the planning (service) area.

SEMPO 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 SEMPO. 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, SEMPO 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 SEMPO service area are proficient in the English language. Based on the Missouri Census Data Center (2014) *ACS Profiles*, **1.9%** 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 SEMPO's Urbanized Area</b>		
<b>Population 5 Years and Over by Language Spoken at Home and Ability to Speak English</b>	<b>Population</b>	<b>Percentage of Population 5 Years and Older</b>
<b>Population 5 Years and Over</b>	<b>49,709</b>	<b>100%</b>
<b>Speak English "less than very well"</b>	<b>964</b>	<b>1.9%</b>
<b>Spanish</b>	<b>1,067</b>	<b>2.1%</b>
Speak English "less than very well"	421	0.8%
<b>Other Indo-European</b>	<b>673</b>	<b>1.4%</b>
Speak English "less than very well"	173	0.3%
<b>Asian and Pacific Island</b>	<b>591</b>	<b>1.2%</b>
Speak English "less than very well"	317	0.6%
<b>All Other</b>	<b>117</b>	<b>0.2%</b>
Speak English "less than very well"	53	0.1%

Note: Numbers may not total due to rounding

Source: US Census Bureau

## 2. Frequency of Contact by LEP Persons with SEMPO Staff

SEMPO reviewed the frequency with which its staff have, or could have, contact with LEP persons. Based on the Title VI Self Survey Forms (Attachment 3), to date, SEMPO has, on average, zero (0) requests per month for an interpreter. SEMPO averages zero (0) phone calls per month where the caller speaks English "less than very well".

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

Outreach activities, summarized in SEMPO'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.

Based on the analysis of frequency of contact of SEMPO staff with LEP persons and the very small percentage of LEP persons (1.9% for all language groups in the service area), it does not appear at this time that language barriers are an issue prohibiting the public from participating in SEMPO's activities. The group with the largest LEP population in the service area speaks Spanish and would represent the greatest need for translation services. However, the number of LEP persons that speak Spanish comprise only 0.8% of the overall population in the service

area. Therefore, as explained above, in Factor 1, SEMPO does not meet the Safe Harbor criteria that require translation of vital documents.

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

Should SEMPO staff encounter an LEP person, internet translation services (such as Google Translate, <http://translate.google.com/>) may be used. Alternatively, staff may use a language line (such as LanguageLine Solutions, <http://www.language.com/>). The estimated cost for these assistance efforts is expected to be minimal, ranging from \$0 - \$500 annually.

#### **Staff LEP Training**

All current SEMPO staff will receive a copy of SEMPO's Title VI Program upon adoption by the Board of Directors. This document includes information on SEMPO's Title VI Procedures and LEP responsibilities. All staff hired after the adoption of SEMPO's Title VI Program will also be provided with a copy. The Executive Director will review SEMPO's Title VI Program with all staff members on an annual basis to ensure they are knowledgeable about their responsibilities in serving LEP persons.

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

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

SEMPO will update the LEP plan as required. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the SEMPO service area. The following will be considered in determining if an update is needed:

- How the needs of LEP persons have been addressed;
- The extent of the current LEP population in the service area;
- Whether the need for, and/or extent of, translation services has changed;
- Whether local language assistance programs have been effective and sufficient to meet the needs of LEP individuals;
- Whether SEMPO's financial resources are sufficient to fund language assistance resources as needed;
- Whether SEMPO has fully complied with the goals of this LEP Plan; and
- Whether complaints have been received concerning SEMPO's failure to meet the needs of LEP individuals.

## G. Advisory Bodies

**Table Depicting Membership of SEMPO Board and Technical Planning Committee, By Race**

<b>Body</b>	<b>African American</b>	<b>Asian American</b>	<b>Caucasian</b>	<b>Latino</b>	<b>Native American</b>	<b>Total</b>
Board of Directors	0%	0%	100%	0%	0%	100%
Technical Planning Committee	0%	0%	100%	0%	0%	100%

SEMPO consists of two bodies: the Board of Directors and the Technical Planning Committee. The current membership of both bodies is 100% Caucasian. The membership of the Board of Directors is established in SEMPO's bylaws. Each member city, county, and organization is allotted a certain number of voting seats on the Board. Appointments to these seats customarily come from the highest ranking officials and positions. Similarly, the membership of the Technical Planning Committee is established in the bylaws, with allotted voting seats. Appointments are made based on the positions and roles that are relevant to the purpose and function of the committee. In making appointments to the SEMPO Board of Directors and the Technical Planning Committee, the member cities, counties, and organizations do not base their decisions on personal traits such as race, ethnicity, gender, etc. SEMPO does recognize the value in having diversity in representation, and supports efforts on the part of its members to find qualified minority candidates to fill positions and roles that will help SEMPO achieve diversity. Additionally, SEMPO maintains a list of key stakeholders which it uses to communicate information about SEMPO's activities, such as upcoming public input sessions on its plans and programs. The list contains a number of organizations that serve under-represented groups, including minorities and low income families.

## H. Demographic Profile and Environmental Justice

The map in Attachment 4 identifies the minority population by percent for each Census block in the SEMPO service area. Percentages range from zero (0) to one hundred (100) and are categorized into subranges. The map generally shows higher concentrations of minorities in the urbanized portions of the service area (namely, the City of Cape Girardeau and the City of Jackson). In particular, the City of Cape Girardeau has a significant number of Census blocks with a minority population in the mid to upper subranges. Furthermore, a majority of these blocks are clustered in the older part of the city, characterized by a traditional grid street pattern, high density, and a wide variety of land uses and housing types. Based on this data, it is clear that there is a statistically significant minority population in the SEMPO service area, many of which live in the older, traditional neighborhoods in Cape Girardeau.

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies or activities on minority and low-income population groups. Within the context of regional transportation planning, environmental justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society. Executive Order 12898 on environmental justice as well as federal and state administrative guidelines for implementing environmental justice requirements serve as the operational guidelines for evaluating and monitoring environmental justice compliance with Title VI. SEMPO staff is responsible for:

- Ensuring Title VI environmental justice compliance;
- Analyzing and making findings regarding the population affected by a particular action;
- Analyzing and making findings regarding the impacts of planned projects on protected Title VI groups, and determining if there will be a disproportionately high and adverse impact on these groups; and
- Disseminating information to the public on the processes and findings of any analysis, in accordance with all agency public involvement procedures. This includes dissemination to groups representing minority media and ethnic/gender related organizations, and the use of public comment periods and public hearings, interpreters, and materials in other languages, if needed.

One of the primary ways SEMPO staff ensures environmental justice compliance is by notifying the public of SEMPO's proposed programs, policies and activities, and providing various means for obtaining public input. SEMPO's Unified Planning Work Program (UPWP) is prepared and adopted annually in accordance with its Public Participation Plan (PPP). The UPWP identifies all of the activities to be conducted and allocates resources for those activities. The UPWP is released for public comment and a public hearing is held prior to final review and adoption.



### **I. Subrecipient Assistance**

SEMPO does not have any subrecipients.

### **J. Subrecipient Monitoring**

SEMPO does not have any subrecipients.

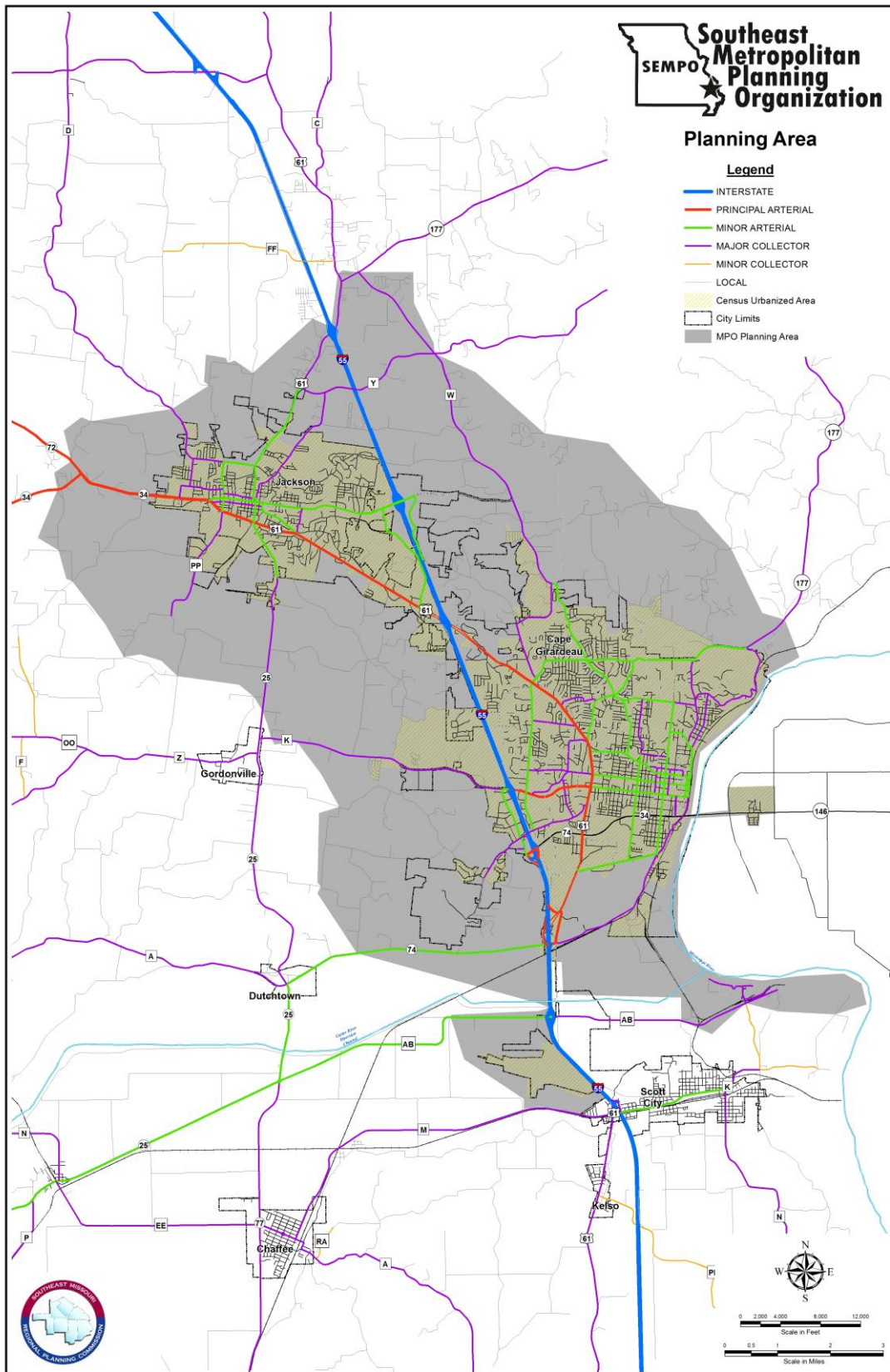
### **K. Equity Analysis of Facilities**

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

### **L. Compliance and Adoption**

Documents pertaining to SEMPO's compliance with Title VI requirements and the adoption of the Title VI Program are included in the attachments.

**Attachment 1**  
**SEMPO Planning (Service) Area Map**



**Attachment 2**  
**Title VI Complaint Form**

This form is to be used to file a complaint with SEMPO based on purported violations of Title VI of the Civil Rights Act of 1964 or the American with Disabilities Act of 1990. If you need assistance completing this form, please contact us by phone at (573) 339-6327, or fax (573) 339-6303.

Only the complainant or the complainant's representative must complete this form.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Individuals discriminated against, if different from above (use additional pages if necessary)

Please explain your relationship to the individual(s) indicated above: \_\_\_\_\_

**Agency Information:**

Agency and/or department name that discriminated: \_\_\_\_\_

Name of individual, if known: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Phone: \_\_\_\_\_

Date discrimination began: \_\_\_\_\_

Last of most recent date of discrimination: \_\_\_\_\_

Waiver request: \_\_\_\_\_

## Title VI Complaint Form (continued)

Generally, complaints of discrimination must be filed within 180 days of the alleged discrimination. If the most recent date of discrimination listed was more than 180 days ago; you may request a waiver of the filing requirement and explain why you waited until now to file your complaint.

### Basis of Alleged Discrimination

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you or others by the agency or department indicated above, please indicate below the basis on which you believe these discriminatory actions were taken. For example, if you believe you were discriminated against because you are African American, you would mark the line labeled race/color and write 'African American' in the space provided. If you believe the discrimination occurred because you are female, you would mark the line labeled sex and write 'female' in the space provided.

Race/Color \_\_\_\_\_  
National Origin \_\_\_\_\_  
Sex \_\_\_\_\_  
Income \_\_\_\_\_  
Religion \_\_\_\_\_  
Age \_\_\_\_\_  
Disability \_\_\_\_\_

### Explanation of Alleged Discrimination

Please explain as clearly as possible what happened. Provide the name(s) of witnesses and others involved in the alleged discrimination. Attach additional sheets if necessary and provide a copy of written materials pertaining to your case.

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Note: The laws observed by this agency prohibit retaliation or intimidation against anyone because the individual has either taken action or participated in action to secure rights protected by these laws. If you experience retaliation or intimidation separate from the discrimination alleged in this complaint or if you have questions regarding the completion of this form, please contact the SEMPO Executive Director's Office, 401 Independence St., Cape Girardeau, MO 63703; (573) 339-6327 phone; (573) 339-6303 fax.

**Attachment 3  
Title VI Self Survey Forms  
Completed by SEMPO Staff**

**LEP STAFF SURVEY FORM**

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

Name of Staff Member: **Molly Hood, Executive Director**

1. How often do you come into contact with individuals who do not speak English or have trouble understanding you when you speak English to them?

DAILY\_\_\_ WEEKLY\_\_\_ MONTHLY\_\_\_ LESS THAN MONTHLY **X**

2. What languages do these passengers speak? **N/A**  
3. What languages (other than English) do you understand or speak? **None**  
4. Would you be willing to serve as a translator when needed? **No**

**Frequency of Contact with LEP Persons**

<b>Frequency</b>	<b>Language Spoken by LEP Persons</b>
Daily	<b><u>N/A</u></b>
Weekly	<b><u>N/A</u></b>
Monthly	<b><u>N/A</u></b>
Less than monthly	<b><u>N/A</u></b>

### LEP STAFF SURVEY FORM

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

Name of Staff Member: **Ryan Shrimplin, Transportation Planner**

1. How often do you come into contact with individuals who do not speak English or have trouble understanding you when you speak English to them?

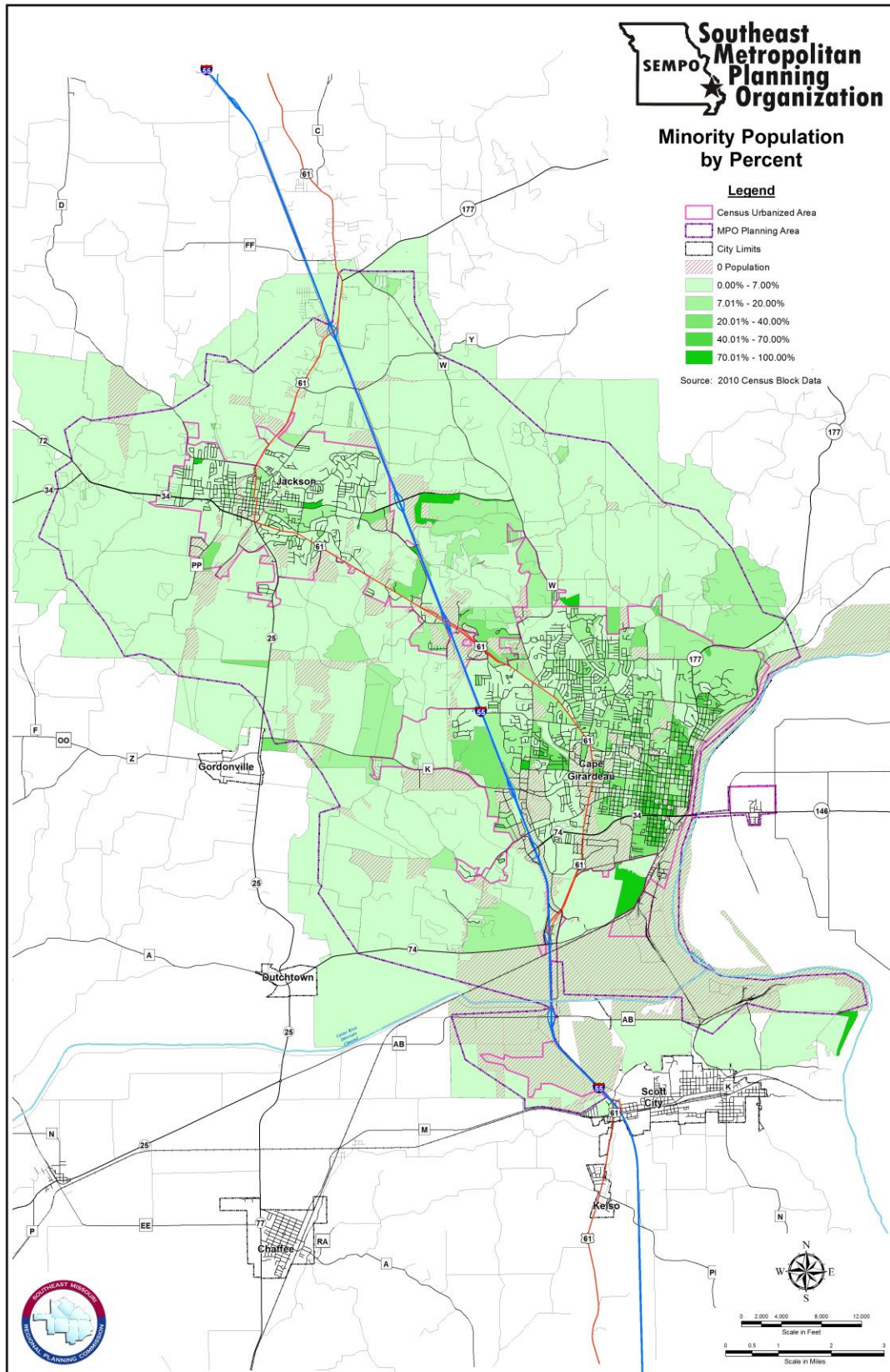
DAILY\_\_\_ WEEKLY\_\_\_ MONTHLY\_\_\_ LESS THAN MONTHLY **X**

2. What languages do these individuals speak? **Spanish**  
3. What languages (other than English) do you understand or speak? **Spanish (non-fluent)**  
4. Would you be willing to serve as a translator when needed? **No**

#### Frequency of Contact with LEP Persons

Frequency	Language Spoken by LEP Persons
Daily	N/A
Weekly	N/A
Monthly	N/A
Less than monthly	Spanish

# **Attachment 4** **SEMPO Minority Population Map**



**Attachment 5**  
**Title VI Assurances**

The Southeast Metropolitan Planning Organization (SEMPO) certifies that, as a condition of receiving federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subject to discrimination in the level and quality of transportation services and transit-related benefits;
2. SEMPO will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the U.S. Department of Transportation's Title VI regulations, 49 CFR Part 21.9;
3. SEMPO will provide notification to the public that any person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the FTA and/or the U.S. Department of Transportation.

The undersigned hereby executes this certification as the duly authorized representative of SEMPO on this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Molly B. Hood, Executive Director



## **Attachment 6**

### **Data Collection and Reporting Requirements**

SEMPO will comply with the following data collection and reporting requirements as outlined in Urban Mass Transit Administration (UMTA) [now FTA] Circular 4702.1.

#### General reporting requirements

All applicants, recipients, and subrecipients are required to maintain and provide to FTA the information outlined below. The information is required under Department of Justice regulation and must be submitted prior to the approval of any grant application. Recipients and subrecipients should provide updated information as conditions warrant. Updates must at a minimum be provided every three years. Information previously submitted under the general reporting requirements may be referenced in subsequent submissions, as appropriate.

All applicants, recipients and subrecipients shall maintain and submit the following general requirements:

1. A list of any active lawsuits of complaints naming the applicant, which allege discrimination on the basis of race, color, sex or national origin with respect to service or other transit benefits. The list should include: the date the lawsuit or complaint was filed; a summary of the allegation; and the status of the lawsuit or complaint, including whether the parties to the lawsuit have entered into a consent decree. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part (e.g., not all information on all modes of transportation).
2. A description of all pending applications for financial assistance, and all financial assistance currently provided by other federal agencies. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.
3. A summary of all civil rights compliance review activities conducted in the last 3 years. The summary should include: the purpose or reason for the review; the name of the agency or organization that performed the review; a summary of the findings and recommendations of the review; and, a report on the status and/or disposition of such findings and recommendations. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the

application, not necessarily the larger agency or department of which the entity is a part.

4. A signed FTA Civil Rights Assurance that all of the records and other information required under Circular 4702.1 have been or will be compiled, as appropriate, and maintained by the applicant, recipient, or subrecipient. In the case of state-administered programs, this assurance should be provided by the primary and subrecipient.
5. A signed standard DOT Title VI Assurance. This assurance will be maintained as part of the FTA "One-Time Submission" file.

**Attachment 7**  
**Resolution of Adoption**  
**(On following page)**

**SOUTHEAST METROPOLITAN PLANNING ORGANIZATION**

**RESOLUTION NO. 2015-06**

**A RESOLUTION ADOPTING THE FY 2014-2017 TITLE VI PROGRAM**

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**WHEREAS**, the Southeast Metropolitan Planning Organization receives financial assistance from the Federal Transit Administration in support of its continuing, cooperative, and comprehensive transportation planning process; and

**WHEREAS**, all programs receiving financial assistance from the Federal Transit Administration are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Department of Transportation's implementing guidelines; and

**WHEREAS**, the Federal Transit Administration requires all recipients to document their compliance by submitting a Title VI Program every three years; and

**WHEREAS**, the Federal Transit Administration requires the governing entity of the recipient to document that it has adopted the Title VI Program; and

**WHEREAS**, the FY 2014-2017 Title VI Program has been presented to the public for review and comment; and

**WHEREAS**, the Technical Planning Committee has recommended adoption of the FY 2014-2017 Title VI Program to the Board of Directors.

**NOW, THEREFORE BE IT RESOLVED** that the Board of Directors of the Southeast Metropolitan Planning Organization hereby adopts the FY 2014-2017 Title VI Program.

PASSED AND APPROVED THIS \_\_\_\_<sup>TH</sup> DAY OF \_\_\_\_\_, 2015.

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Chauncy Buchheit  
Chairman

ATTEST:

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Molly B. Hood  
Executive Director