

Web Co Custom Industries, Inc.

AGENCY NAME

Title VI Program

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DATE

This TEMPLATE is provided by the Missouri Department of Transportation (MoDOT) Transit Section, as a resource for producing the triennial Title VI Program document for Federal Transit Administration recipients and subrecipients. FTA Circular 4702.1B, dated October 1, 2012, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients" was the primary source of material for this template. Use of this template does not override each agency's responsibility to interpret the requirements as expressed in FTA Circular 4702.1B, or as amended in the future.

**Title VI Plan
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Attachment 1 – Agency Information (Sample)

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A. Title VI Assurances

Web Co 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.

Web Co 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. Web Co 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.

Web Co meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Web Co 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

- 1. Mission of Web-Co Custom Industries, Inc.:** Web-Co Custom Industries, Inc. is a community-based organization dedicated to providing paid, meaningful employment opportunities for people with disabilities in a safe, supportive and productive environment, which allows each person to achieve their potential and become as self-sufficient as possible.
- 2. History:** Web-Co Custom Industries was incorporated May 1977, due to the efforts of a group of parents and concerned citizens who recognized the need to provide training and dignified employment opportunities to people with disabilities. May of 1995, saw the beginning work on a new and much larger facility for the workshop and in December of 1997, operations moved to this new building at 948 Prairie Lane. With the larger facility, we were able to hire more people and there are now over 81 employees here at Web-Co. Web-Co is a community based program operated by a local board of directors made up of caring dedicated individuals. We have been fortunate over the years to have people serve on this board who are responsive to the needs of citizens with disabilities. Their vision and guidance have assured Web - Co's success. In November of 2012 Web-Co added an additional 20,000 square ft. building. It is used for the Warren Beck Memorial Recycling Center, our secured shredding, and as additional warehouse space.
- 3. Population served 34,466 citizens Webster Co, 87 certified employees**

4. Service area



Notifying the Public of Rights under Title VI/ADA

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

Web Co 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.

Web Co operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans with Disabilities Act of 1990.

For more information on the [Agency, City , etc.]'s Title VI program, and the procedures to file a complaint, contact [Name or Title] at [phone number]; [email address]; or visit our administrative office at [street address, City, State, Zip]. For more information visit [website address].

If you believe you have been discriminated against on the basis of race, color, or national origin by Web Co, 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: Mike Frazier, General Manager, Web Co Custom Industries, Inc.

How to file a Title VI/ADA complaint with Web Co:

1. Down Load a copy of the complaint form from our Document tab on our web site, www.webcocustom.com
2. In addition to the complaint process at Web Co, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, Kansas City, MO Office.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.

If information is needed in another language, contact 417-468-5890.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Web Co'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 Web Co 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 Web Co Title VI Complaint Form at www.webcocustom.com, or request a copy by writing to [agency's full address.] Information on how to file a Title VI complaint may also be obtained by calling Mike Frazier, GM at 417-468-5890.

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 [agency contact and full address].

COMPLAINT ACCEPTANCE: Web Co will process complaints that are complete.

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

INVESTIGATIONS: Web Co will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Web Co may contact the complainant. Unless a longer period is specified by Web Co, the complainant will have ten (10) days from the date of the letter to send requested information to the Web Co 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 Web Co'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. Web Co 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, Web Co 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 Mike Frazier at Web Co Custom Industries, Inc., PO box 486, Marshfield, MO 65706, or at 417-468-5890.

**E. Monitoring Title VI Complaints, Investigations, Lawsuits
and Documenting Evidence of Agency Staff Title VI Training**

See sample Title VI Self-Survey Form ATTACHMENT 3
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Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in Web Co’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

Web Co’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 [phone]

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

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

2018 – 2021 Title VI Program Public Engagement Process

Web Co will conduct a Public Engagement Process for the 2018-2021 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.

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

Web Co will conduct a 30 day public comment period to provide opportunities for feedback on the 2018-2021 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 2014-2017 Public Outreach Efforts

No comments or complaints filed 2014, 2015, 2016, 2017

G. Language Assistance Plan

Web Co Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address Web Co '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.

Web Co 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 Web Co. 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, Web Co 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 Webster County service area are proficient in the English language. Based on 2010 Census data, 2.3%] of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

LEP Population in Webster County Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [1]				Percentage of Population 5 Years and Older
Population 5 Years and Over	36602				36602
Speak English “less than very well”	1%				1%
Spanish	760				760
Speak English “less than very well”	1%				1%
Other Indo-European					
Speak English “less than very well”					
Asian and Pacific Island	108				108
Speak English “less than very well”	.01%				.01%
All Other					
Speak English “less than very well”					

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

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

Outreach activities, summarized in Web Co'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.

As applicable: Based on our demographic analysis Web Co has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

Web Co will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to Web Co staff:

1. Information on Web Co 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 Web Co's Title VI Plan requirement.

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

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American		Total
Population Committee	96	2.1	1.1	.8		100%

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

Web Co does not have any subrecipients.

OPTION B

Primary recipients should provide subrecipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- Direction regarding obtaining demographic information of population served by subrecipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

Web Co does not have any subrecipients.

OPTION B

Primary recipients must monitor subrecipients.

- Non-compliant subrecipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all subrecipients are complying with the general and specific requirements.
- Collect and review subrecipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is equitably provided.

K. Equity Analysis of Facilities

OPTION A

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

Attachment 1

Agency Information

Web-Co Custom Industries was incorporated May 1977, due to the efforts of a group of parents and concerned citizens who recognized the need to provide training and dignified employment opportunities to people with disabilities. May of 1995, saw the beginning work on a new and much larger facility for the workshop and in December of 1997, operations moved to this new building at 948 Prairie Lane. With the larger facility, we were able to hire more people and there are now over 81 employees here at Web-Co. Web-Co is a community based program operated by a local board of directors made up of caring dedicated individuals. We have been fortunate over the years to have people serve on this board who are responsive to the needs of citizens with disabilities. Their vision and guidance have assured Web - Co's success. In November of 2012 Web-Co added an additional 20,000 square ft. building. It is used for the Warren Beck Memorial Recycling Center, our secured shredding, and as additional warehouse space.

34,466 citizens Webster Co, 87 certified employees

6. Service area



Governing body make-up: Board of Directors: 9 members, Board President, Vice President, Secretary, Treasurer, 5 voting board members, terms 2 to 3 years depending on the term they are replacing, officers can only hold office 1 year.

Attachment 2

Web Co TITLE VI/ADA COMPLAINT FORM

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

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

Please mail or return this form to:

Mike Frazier
Web Co Custom Industries
PO Box 486, Marshfield, MO 65706
mfrazier@webcocustom.com
417-468-5892, 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. () 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: Zipcode:
d. Telephone (include area code): Home () or Cell () Work () - () -
e. Electronic mail (e-mail) address: Do you prefer to be contacted by this e-mail address? () YES () NO
5. What is your relationship to the person for whom you are filing the complaint?
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI) () Disability (class protected by ADA) () 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 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