

# Places for People

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AGENCY NAME

## Title VI Program

Date filed with MoDOT Transit Section:

03/ 1 /2023

DATE

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### **Attachments**

- Attachment 1 – Agency Information (Sample)
- Attachment 2 – Title VI Self Survey Form
- Attachment 3 – Title VI Complaint Form

**A. Title VI Assurances**

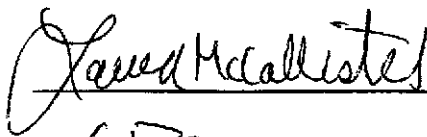
Places for People agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

Places for People 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. Places for People further ensure every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

Places for People meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Places for People 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:

CEO

Date:

3/1/2023

## B. Agency Information

### 1. Mission of Places for People:

Our mission is:

***“Provide caring, effective services to help those with the greatest challenges recover from mental illness and associated chronic illnesses.”***

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<u>Values</u>	<u>Core Ideals</u>
Hopeful	<ul style="list-style-type: none"><li>• Engaging</li><li>• Encouraging</li><li>• Recovery Focused</li><li>• Inspiring</li><li>• Persistent</li></ul>
Excellence	<ul style="list-style-type: none"><li>• Innovative</li><li>• Effective</li><li>• Holistic</li><li>• Efficient</li></ul>
Collaborative	<ul style="list-style-type: none"><li>• Empowerment</li><li>• Trust</li><li>• Safety</li></ul>
Compassion	<ul style="list-style-type: none"><li>• Person Centered</li><li>• Trauma Informed</li><li>• Patient</li><li>• Loving/Caring</li><li>• Respectful</li></ul>

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### 2. History (including year started)

Places for People was founded in 1972 and began with a Supported Housing Program. A Psychosocial Rehabilitation Center (Club) was added in 1975, and a Group Home in 1983. Historically, those three program components functioned very separately within the agency, each with its own staff, director, and program policies. Within each program, individual staff had their own caseload.

In March 1992, Places for People restructured the organization of its programs and services. In an attempt to provide more continuous, comprehensive, and consistent services to clients, the agency converted to a Continuous Treatment Team (CTT) approach. With the CTT model, staff works together within a team and share a caseload.

Places for People (Pfp) merged with Community Alternatives (CA) on January 1, 2011. CA was formed in 1995 in St. Louis as mental health agency with a focus of serving people who were not well served by mainstream providers. Motivating factors for Pfp’s merger with CA included ensuring sustainability in a

future with many challenges to mental health services. The challenges anticipated are both programmatic—preparing for health care reform and ensuring individualized, intensive, and comprehensive mental health services remain available for those who need them—and financial—adapting to the continued dwindling of state funding for mental health services. Additionally, PfP has long recognized that there are other, vulnerable populations who would benefit from our service model and experience.

The merged agency will not compromise services previously delivered by either agency; instead, the new agency will offer multiple programs and services to address wide-ranging and otherwise poorly served needs in the community. The agency is very diligent about developing staff professionally. The agency will be identifying soft skills of staff and developing training tracks that employees will be referred to by their supervisor to acquire the skills to advance in their position either at Places for People or another agency. We will also be putting more “stepping stones” in place for employees to advance to leadership roles. We have been focused more on succession planning, developing leaders with our leadership track and also looking at the agency organization table to ensure we are creating opportunities for growth while also providing efficiencies.

In 2017 Places for People became one of the only approved Community Certified Behavioral Health Centers that is being piloted for 2 years. Under the, CCBHC certification, we have been able to expand our services from Outpatient therapy, longer “walk-in” hours for those in need and adolescents. We have added 28 additional roles in the first year of the project among the various teams. We have added a suboxone clinic to focus on the on-going opioid crisis and continue to partner with community agencies to ensure that the needs of person served are being met from a holistic recovery approach from our agency.

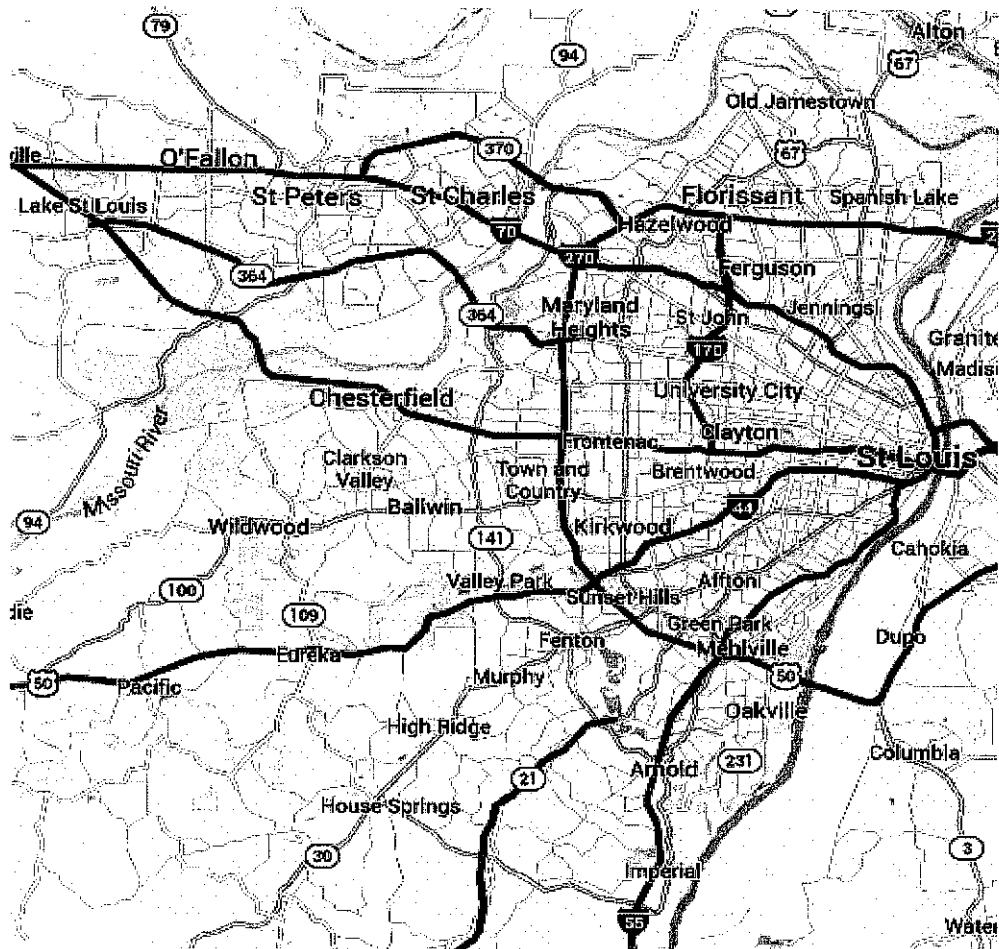
### **3. Regional Profile** *(regional population; growth projection)*

According to the U.S. Census of 2021, the general population of the City of St. Louis is 293,310 people, centrally located in a metropolitan region of 2.81 million people. Residents are 45.64% Caucasian and 47.90% African-American, though neighborhoods are highly segregated. Asians comprise 3.06% of the population and Hispanic/Latinos, 2.08%. The percentage of population under 18 is 19.18% while that over 65 is 13.9% (2022). High school graduates comprise 87.1% of the population compared with 87.6% statewide (2022). Median household income is \$48,751, significantly lower than the statewide median of \$63,594 (2022). Homeownership rates for the City of St. Louis are also significantly lower than the Missouri average, 44.7% and 67.1%, respectively (2022). While the statewide rate of poverty is 13.2%, the poverty rate for residents of St. Louis is 19.6 (2022). According to the 2022 U.S. Census, of residents age five and older, 131,989 reported a disability reflecting a prevalence rate of nearly 45%.

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

Places for People’s mission is to serve those individuals and families in our service area who are least likely to voluntarily present for services. Because of this, we have a significant focus on outreach and engagement of those in our community that could benefit from the services we provide. Approximately

60% of  
we  
are



those  
serve

homeless on initial presentation and all served often have complex treatment profiles. All of those served by P4P have a major mental health disorder, 85% or more additionally have one or more chronic physical health conditions, and 80% or more have significant trauma histories.

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

Places for People's service area includes St. Louis City and St. Louis County in Missouri.

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

Places for People is governed by a 21-person Board of Directors. The members and their terms include:

## Places for People - Board of Directors - FY2023

Last Name	First Name	Office	Work Title	Re-election Date Joined Bd:
Ayling	Nicholas	Director	Azuka Capital Investments, LLC Marketing Leader, Community Volunteer	7/1/2024 12/12/2016
Davis	Kiesha	President	Deaconess Foundation Director, Partnership & Capacity Building	7/1/2023 2/10/2020
Deal	Paul	Director	TRC Staffing Services, Inc. Director of Sales	7/1/2023 11/1/2019
Ford	Tyrone	Secretary	Queen of Peace Chief Operations Officer	7/1/2023 2/10/2020
Franke	Chuck	Director	ARCO Chief Financial Officer	7/1/2023 4/23/2021
Gebhard	Fritz	Director	UMB Bank Senior Vice President	7/1/2024 7/12/2021
Gladney	Sam	Director	Gladney Law Group Attorney	7/1/2023 2/10/2020
Granneman	Thomas	Treasurer	Ralcorp Holdings, Inc. Retired	7/1/2024 2/8/2016
Hennessy	Michelle	Director	Mid-America Transplant Director, Finance and Accounting	7/1/2023 2/14/2022
Javois	Laurent	Director	LJ Transformative Initiatives Consultant - Equity & Inclusion	7/1/2024 11/14/2022
Kissling	Kevin	Director	Collaborative Strategies Senior Consultant	7/1/2023 1/1/2011

Kline	Joe	Director	Baldwin Technology Company, Inc. Chief Executive Officer	7/1/2024 3/31/2017
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Friday, February 10, 2023

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Last Name	First Name	Office	Work Title	Re-election Date Joined Bd:
Lacy	Rodney	Director	Green Street Real Estate Ventures Chief Human Resources Offices	7/1/2024 11/14/2022
McGinnis	Patrick	Director	Moneta CFA, Partner	7/1/2023 8/8/2022
Murphy	Fr. Edward	Director	St. Vincent dePaul Church Rev. Edward F. Murphy	7/1/2024 3/1/2021
Norrenberns	Ellen	Director	Winco Window Company Vice President-Finance	7/1/2024 3/1/2021
Patel	Rajiv	Director	Centene Corporation President, HC Enterprises Provider Strategy	7/1/2023 5/1/2022
Patton	Andrea	Vice President	Lewis Rice LLC Corporate Associate	7/1/2023 1/13/2020
Reed-Fox	Ellen	Director	Operation Food Search Chief Development Officer	7/1/2024 11/14/2022
Schmitz	Andrew	Director	Heidelberg USA, Inc., Mark Andy, Inc. Midwest Regional Sales Manager	7/1/2024 4/23/2021
Wilton	Scott	Director	Centene Corporation Regional Vice President	7/1/2024 9/13/2021



## Notice to the Public

### Notifying the Public of Rights under Title VI

Places for People will post 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.

Places for People 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 Places for People, 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 Places for People:**

1. How to obtain Complaint Form: Contact Places for People Compliance Director or the VP of Operations.
2. In addition to the complaint process at Places for People, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7,  
  
3. 901 Locust Street  
Suite 404  
Kansas City, Missouri 64106.
4. 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.
5. The form must be signed and dated, and include your contact information.

For more information on the Place's for People Title VI program, and the procedures to file a complaint, contact Jaime Greenfield, VP of Operations at 314-535-5600 ext 146; [jgreenfield@placesforpeople.org](mailto:jgreenfield@placesforpeople.org); or visit our administrative office at 1001 Lynch St., St. Louis, MO 63118. For more information visit [www.placesforpeople.org](http://www.placesforpeople.org).

If information is needed in another language, contact VP of Operations for assistance acquiring an interpreter or documents in the needed language.

## D. Procedure for Filing a Title VI Complaint

### Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Places for People'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 Places for People 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 Places for People's Title VI Complaint Form at [www.placesforpeople.org](http://www.placesforpeople.org), or request a copy by writing to:

Places for People  
VP of Operations  
1001 Lynch St.  
St. Louis, MO 63118

Information on how to file a Title VI complaint may also be obtained by calling the Compliance Director or the VP of Operations at 314-535-5600.

You may file a signed, dated complaint no more that 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:

Places for People  
VP of Operations  
1001 Lynch St.  
St. Louis, MO 63118

COMPLAINT ACCEPTANCE: Places for People will process complaints that are complete.

Once a completed Title VI Complaint Form is received, the VP of Operations and will review it to determine if Places for People has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Places for People.

INVESTIGATIONS: Places for People will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, the Compliance Director or the VP of Operations may contact the complainant. Unless a longer period is specified by Places for People, the complainant will have ten (10) days from the date of the letter to send requested information to the Title VI 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 Places for People'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. Places for People 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, Places for People 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 the VP of Operations at:

Places for People  
Attn: VP of Operations  
1001 Lynch St.  
St. Louis, MO 63118  
or at  
314-535-5600

**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 Places for People’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator (Compliance Officer) 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**

Places for People’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 the budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency’s public engagement process. Advisory bodies provide insight and feedback to the agency.
- Consumer Advisory BOD of Places for People
- 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.

### **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**

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

### **2022-2024 Title VI Program Public Engagement Process**

Places for People will conduct a Public Engagement Process for the 2023 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.

Places for People will provide briefings to the Board of Directors and Advisory Bodies.

Places for People will conduct a 30-day public comment period to provide opportunities for feedback on the 2023 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 2022-2023 Public Outreach Efforts**

<b>1) Community visit resumed fully in July 2022</b>
<b>2) A medical mobile van is utilized for intake services</b>
<b>3) Vehicle outfitted with CoVid PPE to ensure transportation to ensure transportation is not a barrier</b>
<b>4) Looking to secure agency vehicles in the next 12 months</b>

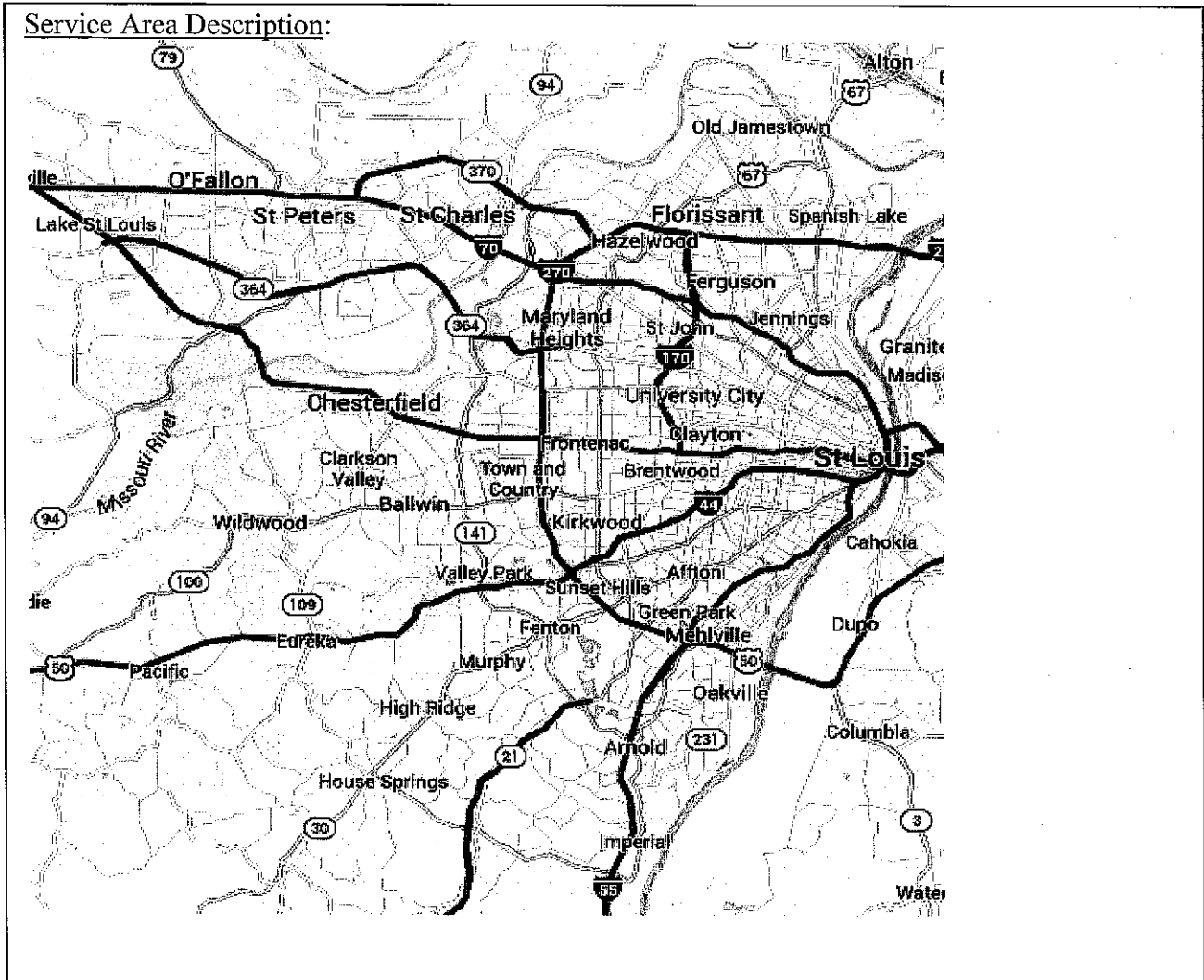
## G. Language Assistance Plan

### Places for People Limited English Proficiency Plan

This Limited English Proficiency (LEP) Plan has been prepared to address Places for People'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:





Places for People 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 Places for People. 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, Places for People 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 Places for People service area are proficient in the English language. Based on 2022 Census data, 9.5% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

LEP Population in _St. Louis City and County_____ Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Service Area 1	Service Area 2	Service Area 3	Service Area Total	Percentage of Population 5 Years and Older
<b>Population 5 Years and Over</b>	940,355	276,272	0	1,216,627	100.00%
Speak English “less than very well”	86,727	21,780	0	108,507	8.92%
<b>Spanish</b>	19,001	6,839	0	25,840	2.12%
Speak English “less than very well”	6,660	1,991	0	8,651	0.71%
<b>French, Haitian, or Cajun</b>	3,635	1,695	0	5,330	0.44%
Speak English “less than very well”	466	487	0	953	0.08%
<b>German</b>	2,697	600	0	3,297	0.27%
Speak English “less than very well”	265	15	0	280	0.02%
<b>Russian</b>	13,466	1,381	0	14,847	1.22%
Speak English “less than very well”	5,506	872	0	6,378	0.52%
<b>Indo-European</b>	14,395	3,048	0	17,443	1.43%

Speak English "less than very well"	11,246	2,070	0	13,316	1.09%
<b>Korean</b>	1,407	763	0	2,170	0.18%
Speak English "less than very well"	674	102	0	776	0.06%
<b>Chinese</b>	9,995	1,706	0	11,701	0.96%
Speak English "less than very well"	4,214	514	0	4,728	0.39%
<b>Vietnamese</b>	1,402	434	0	1,836	0.15%
Speak English "less than very well"	3,938	750	0	4,688	0.39%
<b>Tagalog</b>	1,550	566	0	2,116	0.17%
Speak English "less than very well"	276	0	0	276	0.02%
<b>Asian &amp; Pacific Island</b>	8,613	1,017	0	9,630	0.79%
Speak English "less than very well"	2,049	346	0	2,395	0.20%
<b>Arabic</b>	2,863	1,256	0	4,119	0.34%
Speak English "less than very well"	845	640	0	1,485	0.12%
<b>All Other</b>	3,765	1,725	0	5,490	0.45%
Speak English "less than very well"	683	218	0	901	0.07%

2. Frequency of Contact by LEP Persons with Places for Peoples Services:

The Places for People staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, Places for People has, on average, only one or two requests per month for an interpreter. Places for People averages about 2100 phone calls per month from consumer or potential consumers. The frequency of times the agency comes in contact with LEP person is about 1% per week.

<p>LEP Staff Survey Form</p> <p>Places for People is studying the language assistance needs of its riders so that we can better communicate with them if needed.</p> <p>1. 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?  DAILY   WEEKLY   MONTHLY   LESS THAN MONTHLY</p> <p>2. What languages do these passengers speak?</p> <p>3. What languages (other than English) do you understand or speak?</p> <p>4. Would you be willing to serve as a translator when needed?</p> <p style="text-align: center;">15</p>
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5.

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 Places for People to LEP persons:

Outreach activities, summarized in Places for People’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
Organization: _____
1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to Places for People and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

*As applicable:* Based on our demographic analysis (Factor 1) Places for People has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

Places for People will provide assistance and direction to LEP persons who request assistance.

### Staff LEP Training

The following training will be provided to Places for People staff:

1. Information on Places for People 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 Places for People’s Title VI Plan requirement.

Places for People 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 Places for People 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 Places for People's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Places for People has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning Places for People’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>
Population Committee	49%	1%	49%	1%		100%
Access Committee						N/A at this time
Citizens Advisory Council	51%	0	49%			100%

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

- **Identified by staff that serve clients**

- **Provided written information to those that attended the PSRC about the committee**
- **Elected by their peers**

## **I. Subrecipient Assistance**

### **Subrecipient Assistance**

#### **OPTION A**

Places for People 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**

Places for People 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**

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

**OPTION B1**

N/A- performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

N/A- developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, N/A mapped current locations of residences and businesses in the proposed facilities locations.

**Demographic data and mapping**  
*Guidance may be obtained from regional Metropolitan Planning Organization.*

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.

**OPTION B2**

N/A- performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

N/A- developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, N/A- mapped current locations of residences and businesses in the proposed facilities locations.

**Demographic data and mapping**  
*Guidance may be obtained from regional Metropolitan Planning Organization.*

Regarding the location of applicable projects, the “two-test” exercise was conducted and it was determined that the facility [facilities] could proceed, despite disparate impact, due to a

“substantial legitimate justification” to meet a goal that is integral to the agency’s institutional mission. In addition, no comparable effective alternative location(s) would result in less disparate impact.

**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

The Board of Directors of Places for People has established formal hearing procedures for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within Places for People's transit system, **increasing or decreasing the number of service hours operated on a route by 25% or more, or routing changes that alter 25% or more of a route's path.** Minor changes to an existing route shall not constitute a "major change in route".

A service change that is deemed a "Major Service Change" based on the description above would require a Title VI analysis.

Service changes that are deemed as a "Major Service Change" will also be required to have disparate impact analysis and disproportionate burden analysis done.

The Places for People Title VI Program includes disparate impact and disproportionate burden policies.

### Places for People's Disparate Impact and Disproportionate Burden Policy

Adverse Effects: Major Service Change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined by demographic analysis of proposed changes and U.S. Census data and transit rider data.

What is Fair?: [EXAMPLE] Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths" rule. This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is [20%]. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact on minority populations: If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent

(20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Disproportionate burden on low income populations: If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

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

## Attachment 1 Places for People 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:

VP of Operations  
Places for People  
1001 Lynch St.  
St. Louis, MO 63118  
314-535-5600  
Fax 314-535-3032

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) ( ) 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

**Attachment 2**

**Title VI Self-Survey Form**

Date filed with MoDOT Transit Section:

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**DATE**

Survey Date:

Period Covered:

Name of Program/Grant:

A. Summary of Complaints:

B. Number of complaints for the period:

C. Number of complaints voluntarily resolved:

D. Number complaints currently unresolved:

E. Attach a summary of any type of complaint and provide:

- Name of complainant
- Race
- Allegation
- Findings
- Corrective Action
- Identify any policy/procedure changes made as a result of the complaint.
- Provide the date history (date complaint received through resolution)

continued

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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.

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

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

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

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

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

**Attachment 3  
Agency Title VI Complaint Log 2022-2024**

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