

Title VI Assurances

Manufacturers Assistance Group 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.

Manufacturers Assistance Group 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. Manufacturers Assistance Group 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.

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

- A. Ensure that the level and quality of 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 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.

Agency Information

The mission of Manufacturers Assistance Group is to provide a productive employment opportunity to lower range educable and upper level trainable mentally challenged adults over the age of 16 who have a productive capacity in a sheltered workshop environment but whose capacities are such that there is little or no prospect that vocational rehabilitation training could develop their potentials sufficiently to make them realistically employable in competitive industry.

Manufacturers Assistance Group was incorporated on June 21, 1966 and has continued to provide continuous employment to handicapped individuals since that time. The facility moved into a new modern 40,000 square facility at 3080 Cravens Road in December 2007.

Manufacturers Assistance Group has a service area of all of Butler County, Missouri. Employees must reside in Butler County. Butler County has a population of 42,974 people. To qualify for employment at Manufacturers Assistance Group individuals must have a mental disability and be approved by the Missouri Department of Elementary & Secondary Education Sheltered Workshop Section to qualify for services. Individuals must also be at least sixteen years of age.

Manufacturers Assistance Group is governed by a Board of Directors. Members are appointed by the Butler County Commission. Each director serves a three year term and may be reappointed at the end of his or her term.

A. Notice to the Public

Notifying the Public of Rights under Title VI

Manufacturers Assistance Group posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and vans.

Manufacturers Assistance Group 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 Manufacturers Assistance Group, 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 Manufacturers Assistance Group:

Submission of Complaint: Any person or group who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, or national origin has been unfairly deprived of benefit, or unduly burdened by the transportation planning process, or denied the benefits of, or subjected to discrimination caused by Manufacturers Assistance Group may file a written complaint with the Managing Director. You are not required to use this form; a letter with the same information is sufficient. Note: Upon request, assistance, in preparation of any necessary written material, will be provided to a person(s) who is unable to read or write. Complaints should be mailed or sent to:

**Managing Director
Manufacturers Assistance Group
3080 Cravens Road
Poplar Bluff, MO 63901**

In addition to the complaint process at Manufacturers Assistance Group, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region VII.

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.

The form must be signed and dated, and include your contact information.

If information is needed in another language, contact (573) 785-1624.

Procedures for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Manufacturers Assistance Group'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 Manufacturers Assistance Group 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 website, and in public areas of our agency.

You may download the Manufacturers Assistance Group Title VI Complaint Form at magsws.com, or request a copy by writing to Manufacturers Assistance Group, 3080 Cravens Rd, Poplar Bluff, MO 63901. Information on how to file a Title VI complaint may also be obtained by calling Jeff Arnold at (573) 785-1624.

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, when, and why) 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 Manufacturers Assistance Group, 3080 Cravens Road, Poplar Bluff, MO 63901.

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

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

If the complainant disagrees with Manufacturers Assistance Group'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. Manufacturers Assistance Group 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, Manufacturers Assistance Group will issue a determination letter to the complainant 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 Jeff Arnold at Manufacturers Assistance Group, 3080 Cravens Road, Poplar Bluff, MO 63901, or at (573) 785-1624.

Public Engagement Plan

Title VI Outreach Best Practices

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

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

2013 – 2016 Title VI Program Public Engagement Process

Manufacturers Assistance Group conducted a Public Engagement Process for the 2016 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 polices as well as provide education on how they relate to minority populations.

Manufacturers Assistance Group staff provided briefing to the Board of Directors and Advisory Bodies

Manufacturers Assistance Group provided a 30 day public comment period to provide opportunities for feedback on the 2013-2016 Title VI Program.

Comments are accepted during the public outreach period via:

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

Summary of 2010-2013 Public Outreach Efforts

Manufacturers Assistance Group established a Public Participation Plan that included an outreach plan to engage minority and limited English proficient populations. Notices of public meetings for input were published on the Manufacturers Assistance Group Facebook page and

all employees were given notices of the meetings to distribute to friends and neighbors. The notices were also posted on all entry doors to the facility.

A public meeting for input was held on February 10, 2014 at the facility which is centrally located in the county and will be held yearly to address any concerns or needs for limited English populations.

Surveys were conducted to find resources of translators in house and outside the facility.

A formal comment period was conducted to solicit comments for any recommendations to improve services of the facility. Comments were accepted by email, mail and phone calls to the facility.

A publicly available summary report is available to the public.

**B. Language Assistance Plan
Manufacturers Assistance Group Limited English Proficiency Plan**

This limited English Proficiency (LEP) Plan has been prepared to address Manufacturers Assistance Group’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 discrimination do not take place. This order applies to all state and local agencies which receive federal funds.

<p><u>Service Area Description:</u> All of Butler County, Missouri</p>
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Manufacturers Assistance Group 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 Manufacturers Assistance Group. 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, Manufacturers Assistance Group 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 Butler County service area are proficient in the English language. Based on 2010 Census data less than 1% of the population five years of age and older speak English “less than very well” - a definition of limited English proficiency.

LEP Population in Butler County Service Area		
Population 5 years and over by language spoken at home and ability to speak English	Service Area Butler County	Percentage of Population 5 Years and Older
Population 5 Years and Over	39,764	93.6
Speak English “less than very well”	315	.08
Spanish	586	.15
Speak English “less than very well”	265	.06
Korean	29	.007
Speak English “less than very well”	21	.005
French	28	.007
Speak English “less than very well”	19	.005
Indic	36	.009
Speak English “less than very well”	10	.007

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

2. The importance of programs, activities or services provided by Manufacturers Assistance Group to LEP persons:

Outreach activities, summarized in Manufacturers Assistance Group’s Title VI Public Engagement Plan, includes public meetings and 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.

3. The resources available to Manufacturers Assistance Group 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.

Staff Training

The following training will be provided to Manufacturers Assistance Group staff:

1. Information on Manufacturers Assistance Group 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 Manufacturers Assistance Group's Title VI Plan requirement.

Manufacturers Assistance Group 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 Manufacturers Assistance Group 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 Manufacturers Assistance Group's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Manufacturers Assistance Group has fully complied with the goals of this LEP plan.

7. Determine whether complaints have been received concerning Manufacturers Assistance Group's failure to meet the needs of LEP individuals.

C. Advisory Bodies

Table Depictions Members of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American		Total
Advisory	3	1	1			5