

LEARNING OPPORTUNITIES/QUALITY WORKS, INC.

(LOQW, INC)

AGENCY NAME

Title VI / ADA Program

Date filed with MoDOT Transit Section:

12/7/2022

DATE

This program follows the guidelines as established by the Missouri Department of Transportation (MoDOT) Transit Section, as a resource for producing the triennial Title VI / ADA Program document for Federal Transit Administration recipients and sub recipients. FTA Circular 4702.1B, dated October 1, 2012, "*Title VI / ADA Requirement and Guidelines for Federal Transit Administration Recipients*"

Title VI Plan
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Attachments

Attachment 1 – Agency Information

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A. Title VI / ADA Assurances

LOQW, INC. agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI / ADA 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 / ADA of the Civil Rights Act," 49 CFR part 21.

LOQW, INC 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. LOQW, INC 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.

LOQW Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including LOQW, Inc. 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 / ADA 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: Executive Director

Date: 12-5-2022

B. Agency Information

1. The **Mission** of LOQW, Inc. IS TO POSITIVELY IMPACT THE LIVES OF INDIVIDUALS THROUGH SUPPORT, ADVOCACY AND CONNECTION TO RESEOURCES.
2. **History:** LOQW began providing services in Monroe County, Mo to individuals who have a disability in 1983. LOQW received the first MoDot grant in 1984 to address the transportation needs of individuals in Monroe County who have a disability. LOQW now has 29 agency vehicles located at the six office locations, which were opened in response to underserved individuals with developmental disabilities. LOQW office locations are Monroe City, Shelbina, Macon, and Kirksville, and two offices in Hannibal, MO. LOQW provides four distinct services in all counties: Day Habilitation services in Monroe City office funded by Medical Waiver system; Employment Services for individuals in the community funded by Vocational Rehabilitation and Medical Waiver system; Community Skills training for individuals primarily funded through the Medicaid Waiver system and Service Coordination. LOQW, Inc. is a Mark Twain Area United Way agency. LOQW is nationally accredited by CARF.
3. **Profile (geographic, population):** LOQW servers 14 counties located in Northeast Missouri from the Iowa line south to just north of the St. Louis metropolitan area. The counties served are Putnam, Schuyler, Scotland, Clark, Sullivan, Adair, Knox, Lewis, Macon, Shelby, Marion, Randolph, Monroe and Ralls.
4. **Population served:** The total population of counties LOQW'S served is 151,447. LOQW serves individuals with disabilities from ages 3 to death. In 2020/2021 427 individuals with a wide range of disabilities from intellectual to physical.
5. **Service area (include map, with any routes utilized):** LOQW provides services in Marion, Monroe, Ralls, Lewis, Knox, Clark, Shelby, Macon, Randolph, Putman, Scotland, Sullivan and Adair Counties. Transportation is not a stand-alone service of LOQW, but is connected to other services as a necessary component. Services are directed by a person centered plan. Communication needs are addressed in the plan.
6. **Governing body (make-up, including minority representation):** LOQW has 8 members on their board of directors. Most of these members either have a disability, have or have had an immediate family member with a disability.

C. Notice to the Public

Notifying the Public of Rights under Title VI / ADA

LOQW, INC posts Title VI / ADA notices on our agency's website, in public areas of our agency, in our boardroom, and on our vehicles.

LOQW, INC operates its programs and services without regard to race, color, or national origin, in accordance with Title VI / ADA 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 LOQW, INC, you may file a Title VI / ADA complaint by completing, signing, and submitting the agency's Title VI / ADA Complaint Form.

How to file a Title VI / ADA complaint with LOQW, INC:

1. A Title VI / ADA Complaint Form may be obtained by downloading from the agency web page at www.loqw.com or by calling the individual offices which provide the service delivery. **The complaint form should be directed to: Mary Kendrick, Title VI / ADA Coordinator, at 201 North Locust Street, P. O. Box 254, Monroe City, MO 63456 or by calling 573-735-4282.**
2. In addition to the complaint process at LOQW, Inc., **complaints may also be filed directly with the Federal Transit Administration, Office of Civil Rights, Region VII, 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 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, please contact Mary Kendrick at 573-735-4282 or mkendrick@loqw.com

D. Procedure for Filing a Title VI / ADA Complaint

Filing a Title VI / ADA Complaint

The complaint procedures apply to the beneficiaries of LOQW, Inc.'s programs, activities, products 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 LOQW, INC may file a Title VI / ADA complaint by completing and submitting the agency's **Title VI / ADA Complaint Form**. **Title VI / ADA 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 / ADA complaint is posted on our agency's website, and in public areas of our agency.

You may download the LOQW, Inc. Title VI / ADA Complaint Form at www.loqw.com, or request a copy by writing to PO Box 254 Monroe City, Mo. 63456 Information on how to file a Title VI / ADA complaint may also be obtained by calling Mary Kendrick at 573-735-4282.

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 Mary Kendrick 201 N Locust PO Box 254 Monroe City, MO 63456.

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

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

If the requested information is not received within that time frame 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 / ADA investigator reviews the complaint, the Title VI / ADA 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 / ADA 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 LOQW, Inc.'s determination, the complainant may request reconsideration by submitting the request in writing to the Title VI / ADA 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. LOQW, Inc. 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, LOQW, Inc. 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 Mary Kendrick, LOQW, Inc. at 201 N Locust, PO Box 254, Monroe City, MO 63456, or at 573-735-4282. mkendrick@loqw.com

E. Monitoring Title VI / ADA Complaints, Investigations, Lawsuits

Documenting Title VI / ADA Complaints/Investigations

All Title VI / ADA complaints will be entered and tracked in LOQW, Inc.'s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI / ADA Coordinator shall maintain the log. The Title VI / ADA Coordinator is Mary Kendrick, PO Box 254 Monroe City, Mo. 63456

LOQW, Inc. Title VI / ADA 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

LOQW Inc.'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. These meetings are held in Nov.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings: Literacy Center meetings, SB 40 Board meetings
- b. Open houses at the Hub in Monroe City
- c. Rider forums
- d. Rider outreach: Surveys and plan included in all vehicles
- e. Public hearings: Held in Macon and Monroe City offices.
- f. Focus groups
- g. Surveys: Published in LOQW Agency Whispers , and on Facebook and provide information.
- 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 tools for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customers

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 / ADA Outreach Best Practices

LOQW, Inc. ensures all outreach strategies, communications and public involvement efforts comply with Title VI / ADA. LOQW, Inc.'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, LOQW, Inc. provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI / ADA 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.

2020-2023 Title VI / ADA Program Public Engagement Process

LOQW, Inc. conducted a Public Engagement Process for the 2020-2023 Title VI / ADA Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI / ADA Plan. Materials have been created to explain Title VI / ADA policies as well as provide education on how they relate to minority populations.

LOQW, Inc. provided briefings to the Board of Directors and Advisory Bodies in December 2019.

LOQW, Inc. conducted a 30-day public comment period to provide opportunities for feedback on the 2020-2023 Title VI / ADA Program ending 12/30/2019.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool presented in agency newsletter.

Summary of 2019-2021 Public Outreach Efforts

LOQW Inc. provides a monthly newsletter to staff, consumers and partner organizations.
LOQW provides public speaking engagements in the community and has a significant volunteer effort of over 60 volunteer sites in the agency population area, including Adopt a Mile.
LOQW is a United Way agency; attends numerous job and agency fairs to market and provide community education.
Discusses Title VI / ADA efforts and staff meetings, managers meetings, etc. to promote understanding and to ensure compliance throughout the organization.

G. Language Assistance Plan

LOQW, INC Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address LOQW, INC'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 / ADA 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: LOQW, Inc. provides services to individuals with disabilities in Marion, Monroe, Ralls, Shelby, Knox, Clark, Lewis, Macon, Adair, Putman, Scotland, Sullivan, Schuyler and Randolph counties. No direct fixed routes are run. Transportation is linked to a service provided, not as a stand-alone service. All consumer services are linked to the individual's support plan. These plans designate communication needs of the individual.

LOQW, INC 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 LOQW, INC. 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, LOQW, Inc. undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analyses

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 LOQW, Inc. service area are proficient in the English language. Based on 2020 Census data, 1.56% of the population in our service area that are five years of age and older speak English "less than very well" – a definition of limited English proficiency

LEP Population in Service Area NE MO by County					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [Adair]	Service Area Sector [Marion]	Service Area Sector [Monroe]	Service Area Sector [Clark]	Service Area Sector [Putnam]
Population 5 Years and Over	24,242	26,861	8214	6414	4542
Speak English "less than very well"	431	115	92	74	78
Spanish	292	186	44	48	37
Speak English "less than very well"	31	69	12	12	2
Other Indo-European	655	127	273	274	121
Speak English "less than very well"	318	0	80	62	75
Asian and Pacific Island	450	157	21	4	0
Speak English "less than very well"	60	46	0	0	1
All Other	51	17	0	0	0
Speak English "less than very well"	22	0	0	0	0

LEP Population in Service Area NE MO by County

Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [Knox]	Service Area Sector [Randolph]	Service Area Sector [Ralls]	Service Area Sector [Schuyler]	Service Area Sector [Lewis]
Population 5 Years and Over	3743	23,474	9708	4122	9515
Speak English "less than very well"	6	232	31	14	79
Spanish	43	231	41	15	201
Speak English "less than very well"	0	70	3	2	18
Other Indo-European	210	306	75	123	144
Speak English "less than very well"	6	107	28	0	52
Asian and Pacific Island	0	100	5	0	37
Speak English "less than very well"	0	55	0	0	9
All Other	0	0	9	12	10
Speak English "less than very well"	0	0	0	12	0

LEP Population in Service Area NEMO by County

Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [Macon]	Service Area Sector [Scotland]	Service Area Sector [Shelby]	Service Area Sector [Sullivan]	
Population 5 Years and Over	14373	4487	5721	6031	
Speak English "less than very well"	92	48	62	567	
Spanish	102	17	42	1014	
Speak English "less than very well"	16	0	9	542	
Other Indo-European	144	349	177	11	
Speak English "less than very well"	51	48	51	7	
Asian and Pacific Island	35	0	10	9	
Speak English "less than very well"	25	0	2	1	
All Other	17	0	0	36	
Speak English "less than very well"	0	0	0	17	

LEP Population in Service Area NEMO Totals					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Total	Percentage of Population 5 Years and Older			
Population 5 Years and Over	151447	2.65			
Speak English "less than very well"	1921	1.56			
Spanish	2323	1.58			
Speak English "less than very well"	786	1.47			
Other Indo-European	2989	3.03			
Speak English "less than very well"	885	3.22			
Asian and Pacific Island	828	1.18			
Speak English "less than very well"	199	.63			
All Other	152	.52			
Speak English "less than very well"	51	.49			

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

The LOQW, Inc. staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, LOQW, Inc. has, on average, only 1-2 requests per year and all requests have been for a sign language interpreter; averages 0 phone calls per month.

LEP Staff Survey Form	
LOQW, Inc. is studying the language assistance needs of its riders so that we can better communicate with them if needed.	
<ol style="list-style-type: none"> 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? <div style="text-align: center;">DAILY WEEKLY MONTHLY LESS THAN MONTHLY</div> 2. What languages do these passengers speak? 3. What languages (other than English) do you understand or speak? 4. Would you be willing to serve as a translator when needed? 	

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 LOQW to LEP persons:

Outreach activities, summarized in LOQW's Title VI / ADA 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: _____	
<ol style="list-style-type: none"> 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 LOQW, Inc. 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) Based on our demographic analysis, LOQW, Inc., has determined that no language group(s) within its service area meet Safe Harbor criteria requiring written translated "vital documents" by language group(s).
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 LOQW, Inc. Staff:

1. Information on LOQW, Inc. Title VI / ADA 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 LOQW, Inc.'s Title VI / ADA Plan requirement. In addition, LOQW has a Cultural Diversity Plan which addresses language barriers.

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

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Population Committee						
Access Committee						
Citizens Advisory Council	100%					100%
Bicycle Pedestrian Committee						

Description of efforts made to encourage minority participation on committees:

- Advertise openings on Board via web
- Invite minority members to join by personal invitation

LOQW, Inc. has a board of Directors. Advisory boards would include the local SB 40 boards that provide funding and partnership to the LOQW board. These include:

- Macon County Commission for Developmentally Disabled Citizens --MCCDDC
- Monroe County Board for the Handicapped

I. Sub recipient Assistance

Sub recipient Assistance

OPTION A

LOQW, Inc. Does not have any sub recipients.

J. Sub recipient monitoring

Sub recipient monitoring

OPTION A

LOQW, Inc. Does not have any sub recipients.

K. Equity Analysis of Facilities

OPTION A

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

L. System-Wide Service Standards and Policies*

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

This does not apply to LOQW, Inc.

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.*

This does not apply to LOQW, Inc.

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.*

This does not apply to LOQW, Inc.

O. Service and Fare Equity Analysis*

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

This does not apply to LOQW, Inc.