

# Title VI Plan

## Shawnee Mass Transit District April 2023

Title VI Contact: Mike Pietrowski, Executive Director

Title VI Contact Phone: 618-658-8384

Title VI Contact Email: [mpietrowski@smtdil.com](mailto:mpietrowski@smtdil.com)

Alternate Language Phone: 866-577-6278 extension 3

Address: 100 Smart Drive Vienna Illinois 62995

Web Address: shawneemtd.com

Para Información en Español: Mike Pietrowski, Executive Director

## Executive Summary

Shawnee Mass Transit District provide safe, affordable & effective transportation to all the citizens of our five southernmost counties in Illinois: Alexander, Johnson, Massac, Pulaski and Union. Rely on our dependable transportation for shopping, medical, education, work or wherever you need to go. Shawnee Mass Transit District has been operating since 2001 and currently employees over 65 people. Our primary funding comes from the Downstate Operating Assistance Program (DOAP) and the Federal 5311 Grant, which provides funding for transportation in rural areas. Shawnee Mass Transit District also participate in the Consolidated Vehicle Procurement (CVP) program for vehicle purchases and received Coronavirus Aid, Reflied and Economic Security (CARES) funding.

AS AMENDED, Title VI of the Civil Rights Act of 1964 applies to U.S. Department of Transportation Federal Transit Administration (FTA) sub-recipients. The purpose of Title VI is to ensure that no person in the United States shall, on the grounds 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 from the FTA. The program described herein describes Shawnee Mass Transit District's efforts to comply with the Title VI regulations issued by the U.S. Department of Justice and the U.S. Department of Transportation. The objectives of the Shawnee Mass Transit Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color, or national origin.
- Ensure the full and fair participation of all affected populations in transportation decision-making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations and
- Ensure that persons with limited English proficiency have meaningful access to programs and activities that recipients and sub-recipients administer.

### **Annual Submissions to the Illinois Department of Transportation**

SMTD ensures compliance with the Illinois Department of Transportation (IDOT) Title VI Program requirements. SMTD will submit an annual assurance to verify Title VI compliance as part of the standard assurances it submits to IDOT with grant applications.

## **TITLE VI ASSURANCE**

### **TITLE VI ASSURANCE TO FEDERAL TRANSIT ADMINISTRATION**

Shawnee Mass Transit District hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation--Effectuation of the Title VI of the Civil Rights Act of 1964 and other pertinent directives, to the end and that in accordance with the Act, Regulations, and other relevant directives, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Shawnee Mass Transit District received Federal financial assistance from the Department of Transportation, including the Federal Transit Administration and, Hereby gives assurance that it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above assurances, Shawnee Mass Transit District gives the assurances as listed in the "Verification of Level and Quality of Service" with respect to the Federal Transit Administration Grant Program.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Transit Administration.

## **Title VI Notice to the Public**

Shawnee Mass Transit District hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally-assisted programs require that no person in the United States of America shall on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discretionary practice regarding SMTD's programs has the right to file a formal complaint. Any such complaint must be in writing and submitted to the SMTD Title VI Coordinator within sixty, (60) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

Mike Pietrowski  
Shawnee Mass Transit District  
100 Smart Drive  
Vienna, IL 62995  
618-658-8384  
[mpietrowski@smtdil.com](mailto:mpietrowski@smtdil.com)

### Aviso al público del Título VI

El Distrito de Tránsito Masivo de Shawnee por la presente da aviso público de su política de mantener y asegurar el cumplimiento total con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987 y todas las leyes relacionadas. El Título VI y las leyes relacionadas que prohíben la discriminación en programas asistidos por el gobierno federal requieren que ninguna persona en los Estados Unidos de América sea excluida de la participación en, se le nieguen los beneficios de, o sea objeto de discriminación en virtud de cualquier programa o actividad que reciba asistencia financiera federal, por motivos de raza, color u origen nacional.

Cualquier persona que crea que ha sido perjudicada por una práctica discrecional ilegal con respecto a los programas de SMTD tiene derecho a presentar una queja formal. Cualquier queja de este tipo debe ser presentada por escrito y enviada al Coordinador del Título VI de SMTD dentro de los sesenta (60) días siguientes a la fecha del presunto suceso. Para obtener más información sobre quejas de derechos civiles, por favor contacte a:

Mike Pietrowski  
100 Smart Drive Vienna, IL 62995  
618-658-8384  
[mpietrowski@smtdil.com](mailto:mpietrowski@smtdil.com)

## Title VI Complaint Procedures

The following procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

1. Any person who believes he and/or she has been discriminated against on the basis of race, color or national origin may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
2. Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
3. Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The Title VI contact person will assist the complainant with documenting the issues if necessary.
4. Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
5. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
6. Once submitted Shawnee Mass Transit District will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Shawnee Mass Transit District or submitted to the State or Federal authority for guidance.
7. Shawnee Mass Transit District will notify the IDOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at (217) 782-2762; or email at [DOT.Complaint@illinois.gov](mailto:DOT.Complaint@illinois.gov).
8. Shawnee Mass Transit District has 15 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant

or does not receive the additional information within 15 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

9. After the investigator reviews the complaint, she/he 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 Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
10. A copy of either the closure letter or LOF must also be submitted to IDOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
11. A complainant dissatisfied with Shawnee Mass Transit District's decision may file a complaint with the Illinois Department of Transportation (IDOT) or Federal Transit Administration (FTA) offices of Civil Rights: IDOT: ATTN ADA/Title VI Program Coordinator 69 W. Washington Street Room 2100 Chicago, IL 60602 FTA: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
12. A copy of these procedures can be found online at :[shawneemtd.com](http://shawneemtd.com)

## TITLE VI COMPLAINT FORM

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

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

Telephone Numbers: (home) \_\_\_\_\_ (work) \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

Accessible Format Requirements:

Large Print  Audio Tape  TDD  Other \_\_\_\_\_

*The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low-income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.*

*In Shawnee Mass Transit District's complaint investigation process, we analyze the Complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider, and assistance is offered to correct the inadequacies within a predetermined timeframe. The State of Illinois may also refer the matter to the U.S. Department of Justice for enforcement.*

### **Section II**

Are you filing this complaint on your behalf? Yes  No  (If you answered 'yes' to this question, go to section III)

If the answer was 'no,' please supply the name of the person for whom you are complaining:

---

---

Please explain why you have filed for a third party:

---

---

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes  No

### **Section III**

Have you previously filed a Title VI complaint with Shawnee Mass Transit District or the FTA?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what was your FTA Complaint Number? \_\_\_\_\_

*Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.*

Have you ever filed with any of the following agencies?

Transit Provider \_\_\_\_\_ IDOT \_\_\_\_\_ Department of Justice \_\_\_\_\_

Equal Employment Opportunity Commission \_\_\_\_\_ Other \_\_\_\_\_

Have you filed a lawsuit regarding this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please provide a copy of the complaint form.

*Note: The above information is helpful for administrative tracking purposes. However, we will defer to the court's decision if litigation is pending regarding the same issues.*

### **Section IV**

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route number, witnesses, and any other information to assist us in investigating your allegations. Please also provide any other documentation that is relevant to this complaint.

### **Section V**

May we release a copy of your complaint to the Illinois Department of Transportation (IDOT)? Yes \_\_\_\_\_ No \_\_\_\_\_

May we release your identity to the IDOT? Yes \_\_\_\_\_ No \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Please submit this form in person at the address below, or mail this form to:

Shawnee Mass Transit District  
Mike Pietrowski, Executive Director  
100 Smart Drive Vienna Illinois 62995  
618-658-8384  
[mpietrowski@smtdil.com](mailto:mpietrowski@smtdil.com)

A copy of this form can be found online at [shawneemtd.com](http://shawneemtd.com)

## Procedimientos de Queja de la Sección VI

Los siguientes procedimientos brindan orientación para todas las denuncias presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964. La intimidación o represalia como resultado de una denuncia está prohibida por ley. Además de estos procedimientos, los denunciantes se reservan el derecho de presentar una denuncia formal ante otras agencias estatales o federales o buscar asesoramiento privado para denuncias que aleguen discriminación. Se hará todo lo posible para resolver las denuncias en el nivel más bajo posible.

1. Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional puede presentar una queja de discriminación completando y enviando el Formulario de Queja del Título VI de la agencia.
2. Las denuncias formales deben presentarse dentro de los 180 días calendario a partir de la última fecha del presunto acto de discriminación o la fecha en que la presunta discriminación se hizo conocida para el o los denunciantes, o en caso de haber existido un curso continuo de conducta, la fecha en que se interrumpió la conducta o la última instancia de la misma.
3. Las quejas deben estar por escrito y firmadas por el o los denunciantes, y deben incluir el nombre, dirección y número de teléfono del o los denunciantes. El encargado de contacto del Título VI ayudará al denunciante a documentar los problemas si es necesario.
4. Las denuncias recibidas por fax o correo electrónico serán reconocidas y procesadas, una vez que se haya establecido la identidad del o los denunciantes y la intención de continuar con la denuncia. Para ello, se requiere que el denunciante envíe por correo una copia original firmada de la transmisión del fax o correo electrónico para que la denuncia sea procesada.
5. Las denuncias recibidas por teléfono serán reducidas a escrito y proporcionadas al denunciante para su confirmación o revisión antes de su procesamiento. Se enviará al denunciante un formulario de queja para que lo complete, firme y devuelva para su procesamiento.
6. Una vez presentado, el Distrito de Tránsito Masivo de Shawnee revisará el formulario de queja para determinar la jurisdicción. Todas las quejas recibirán una carta de acuse de recibo informando si la queja será investigada por el Distrito de Tránsito Masivo de Shawnee o si se enviará a la autoridad estatal o federal para obtener orientación.
7. El Distrito de Tránsito Masivo de Shawnee notificará a la Oficina de Derechos Civiles del IDOT sobre TODAS las quejas de discriminación dentro de las 72 horas a través del teléfono (217) 782-2762 o el correo electrónico [DOT.Complaint@illinois.gov](mailto:DOT.Complaint@illinois.gov).
8. El Distrito de Tránsito Masivo de Shawnee tiene 15 días hábiles para investigar la queja. Si se necesita más información para resolver el caso, la autoridad puede contactar al denunciante. El denunciante tiene 15 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado

por el denunciante o no recibe la información adicional dentro de los 15 días hábiles, la autoridad puede cerrar el caso administrativamente. Un caso también puede cerrarse administrativamente si el denunciante ya no desea continuar con su caso.

9. Después de que el investigador revise la queja, emitirá una de dos cartas al denunciante: una carta de cierre o una carta de hallazgo (LOF). Una carta de cierre resume las acusaciones y establece que no hubo violación de discriminación y que el caso será cerrado. Una LOF resume las acusaciones y las entrevistas relacionadas con el presunto incidente y explica si se tomará alguna medida disciplinaria, capacitación adicional del personal o cualquier otra acción.
10. Una copia de la carta de cierre o de la LOF también debe ser enviada al IDOT dentro de las 72 horas siguientes a esa decisión. Las cartas pueden ser enviadas por correo o correo electrónico.
11. Un denunciante insatisfecho con la decisión de Shawnee Mass Transit District puede presentar una queja ante las oficinas de Derechos Civiles del Departamento de Transporte de Illinois (IDOT) o de la Administración Federal de Tránsito (FTA): IDOT: ATTN Coordinador del Programa ADA/Title VI 69 W. Washington Street Room 2100 Chicago, IL 60602 FTA: Atención Coordinador del Programa Title VI, Edificio Este, 5º Piso-TCR 1200 New Jersey Ave., SE Washington DC 20590
12. Una copia de estos procedimientos se puede encontrar en línea en: [shawneemtd.com](http://shawneemtd.com)

## FORMULARIO DE QUEJA DEL TÍTULO VI

Nombre: \_\_\_\_\_

dirección: \_\_\_\_\_

Números de teléfono: (casa) \_\_\_\_\_ (trabajo) \_\_\_\_\_

Dirección de correo electrónico.: \_\_\_\_\_

Requisitos de formato accesible.:

Impresión grande  Cinta de audio  TDD  Otro \_\_\_\_\_

*La Oficina de Derechos Civiles de la Administración Federal de Tránsito (FTA) es responsable del cumplimiento y monitoreo de los derechos civiles, lo que incluye garantizar que los proveedores de transporte público cumplan adecuadamente con el Título VI de la Ley de Derechos Civiles de 1964, la Orden Ejecutiva 12898, "Acciones Federales para Abordar la Justicia Ambiental en las Poblaciones Minoritarias y de Bajos Ingresos" y la Guía del Departamento de Transporte a los Beneficiarios con Dominio Limitado del Inglés (LEP) sobre los Servicios Especiales de Lenguaje.*

*En el proceso de investigación de quejas del Distrito de Tránsito Masivo de Shawnee, analizamos las acusaciones del Demandante en busca de posibles deficiencias relacionadas con el Título VI por parte del proveedor de transporte. Si se identifican deficiencias, se presentan al proveedor de transporte y se ofrece asistencia para corregir las insuficiencias dentro de un plazo determinado. El estado de Illinois también puede referir el asunto al Departamento de Justicia de los Estados Unidos para su aplicación.*

### **Sección II**

¿Está presentando esta queja en su nombre? Si  No  (Si respondió "sí" a esta pregunta, vaya a la sección III)

Por favor, explique por qué ha presentado una queja en nombre de un tercero:

---

---

Por favor, confirme que ha obtenido el permiso de la parte agraviada si está presentando la queja en nombre de un tercero. Si  No

---

### **Sección III**

¿Ha presentado anteriormente una queja del Título VI ante el Distrito de Tránsito Masivo de Shawnee o la FTA? Si \_\_\_\_\_ No \_\_\_\_\_

En caso afirmativo, ¿cuál fue su número de queja de la FTA? \_\_\_\_\_

*Nota: Esta información es necesaria para fines administrativos; asignaremos el mismo número de queja a la nueva queja.*

¿Alguna vez ha presentado una queja ante alguna de las siguientes agencias?

Proveedor de transporte \_\_\_\_\_ IDOT \_\_\_\_\_ Departamento de Justicia \_\_\_\_\_

Comisión para la Igualdad de Oportunidades en el Empleo.\_\_\_\_\_ Otro \_\_\_\_\_

¿Ha presentado una demanda con respecto a esta queja? Si \_\_\_\_\_ No \_\_\_\_\_

En caso afirmativo, proporcione una copia del formulario de queja.

*Nota: La información anterior es útil para fines de seguimiento administrativo. Sin embargo, nos deferiremos a la decisión del tribunal si hay litigios pendientes con respecto a los mismos problemas.*

### **Sección IV**

En hojas separadas, por favor describa su queja. Debe incluir detalles específicos como nombres, fechas, horarios, número de ruta, testigos y cualquier otra información que nos ayude a investigar sus acusaciones. Por favor, proporcione también cualquier otra documentación relevante para esta queja.

### **Sección V**

¿Podemos enviar una copia de su queja al Departamento de Transporte de Illinois (IDOT)? Si \_\_\_\_\_ No \_\_\_\_\_

¿Podemos divulgar su identidad al IDOT? Si \_\_\_\_\_ No \_\_\_\_\_

Firma \_\_\_\_\_ Fecha \_\_\_\_\_

Por favor, presente este formulario en persona en la siguiente dirección o envíelo por correo a:

Distrito de Tránsito Masivo de Shawnee  
Mike Pietrowski, Director Ejecutivo  
100 Smart Drive Vienna Illinois 62995  
618-658-8384  
[mpietrowski@smtdil.com](mailto:mpietrowski@smtdil.com)

## **Title VI Investigations, Complaint, and Lawsuit**

To comply with 49 CFR Section 21.9 (b), Shawnee Mass Transit District has prepared and maintains a list of active investigations, lawsuits, or complaints naming Shawnee Mass Transit District that allege discrimination based on race, color, or national origin. The list includes:

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation;
- The status of the investigation; and
- Actions taken in response to the investigation, lawsuit, or complaint.

There are currently 0 active investigations, lawsuits, or complaints alleging discrimination by Shawnee Mass Transit District on race, color, or national origin. There have been 0 (Zero) Title VI discrimination complaints, investigations, or lawsuits in 2023.

### **TITLE VI COMPLAINT RECORD KEEPING**

Complainant	Date	Basis of Complaint (Race, Color or National Orgin)	Status	Action(s) Taken	Final Findings?
<b>Investigations</b>					
1)					
2)					
<b>Lawsuits</b>					
1)					
2)					
<b>Complaints</b>					
1)					
2)					

## **Public Participation Plan**

Shawnee Mass Transit District is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

As an agency receiving federal financial assistance, Shawnee Mass Transit District made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to IDOT CRO.

- Expanded the publication and distribution of agency brochures
- Posted the Nondiscrimination Public Notices to the following locations:
  - All Depot Locations
  - Website
  - Within Transportation Vehicles
- Partnered with other local agencies to advertise services provided

Shawnee Mass Transit District will make the following community outreach efforts for the upcoming year:

- Advertise Public announcements through brochures, website and social media
- Expand the distribution of agency brochures
- Post the Nondiscrimination Public Notices to the following:
  - o All Depot Locations
  - o Website and social media sites
  - o Within Transportation Vehicles

## Limited English Proficiency Plan

Shawnee Mass Transit District has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Shawnee Mass Transit District's services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the Shawnee Mass Transit District's extent of obligation to provide LEP services, the Shawnee Mass Transit District undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the Shawnee Mass Transit District service area who may be served or likely to encounter by Shawnee Mass Transit District's program, activities, or services;

### LIMITED ENGLISH PROFICIENCY POPULATION CONCENTRATIONS

Total Population	52763	
Speak Only English	51129	96.90%
Speak only Spanish	1258	2.38%
Speak English "Very Well"	764	1.45%
Speak English Less than "Very Well"	494	0.94%
Speak other Indo-European Languages	171	0.32%
Speak English "Very Well"	127	0.24%
Speak English Less than "Very Well"	44	0.08%
Speak Asian and Pacific Island Languages	173	0.33%
Speak English "Very Well"	130	0.25%
Speak English Less than "Very Well"	43	0.08%

- 2) The frequency with which LEP individuals come in contact with a Shawnee Mass Transit District service(s); Shawnee Mass Transit District's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for 2022. Shawnee Mass Transit District averages two contacts per year.
- 3) The nature and importance of the program, activities or services provided by the Shawnee Mass Transit District to the LEP population.
- 4) The resources available to Shawnee Mass Transit District and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Shawnee Mass Transit District provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

## **Safe Harbor Provision for written translations**

Shawnee Mass Transit District complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

1) Shawnee Mass Transit District provides language assistance services through the below methods:

- Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
- Instructions are provided to customer service staff and other Shawnee Mass Transit District staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
- Instructions are provided to vehicle operators, county supervisors, and others who regularly interact with the public on how to respond to an LEP customer.
- Bilingual or multilingual versions of:
  - "Need a Ride" brochure
  - Passenger Rules brochure

2) Shawnee Mass Transit District provides notice to LEP persons about the availability of language assistance through the following methods:

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available from the agency.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
- Signs and handouts available in vehicles and at depots
- Agency websites

3) Shawnee Mass Transit District monitors, evaluates and updates the LEP plan through the following process:

Shawnee Mass Transit District will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. Shawnee Mass Transit District will make changes to the language assistance plan based on feedback received. Shawnee Mass Transit District may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, Shawnee Mass Transit District may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. Shawnee Mass Transit District will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

4424) Shawnee Mass Transit District trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. Shawnee Mass Transit District will implement processes for training of staff through the following procedures:

Shawnee Mass Transit District will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. Shawnee Mass Transit District will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. Shawnee Mass Transit District will implement LEP training to be provided for agency staff. Shawnee Mass Transit District staff training for LEP to include:

- A summary of the Shawnee Mass Transit District responsibilities under the DOT LEP Guidance;
- A summary of the Shawnee Mass Transit District language assistance plan;
- A summary of the number and proportion of LEP persons in the Shawnee Mass Transit District service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the Shawnee Mass Transit District cultural sensitivity policies and practices.

### Non-Elected Committees Membership Table

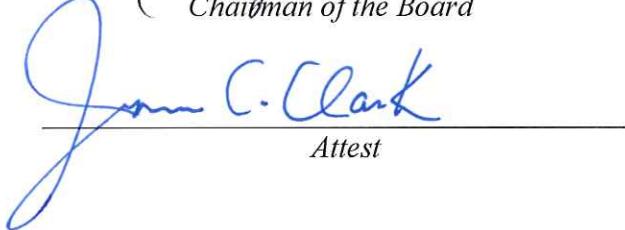
Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Shawnee Mass Transit District **does not** select the membership of any transit-related committees, planning boards, or advisory councils.

### Board Approval for the Title VI Plan

  
\_\_\_\_\_  
Nancy S. Don  
*Chairman of the Board*

4/27/23  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
John C. Clark  
*Attest*

4/27/2023  
\_\_\_\_\_  
Date