



Title VI Program

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A. Title VI Assurances

Job Point 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.

Job Point 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. Job Point 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.

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

- A. Ensure that the level and quality of transportation and other services are provided without regard to race, color, or national origin. Further, it is the policy and practice of Job Point to provide services to persons without regard to religion, gender, origin, disability, sexual orientation, veteran status, marital status, pregnancy, genetic information, or gender identity, except where *bona fide* occupational requirements exist. For persons 17-1/2 years or older, vocational services shall also be provided without regard to age.
- 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 and service delivery related decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of Job Point

Job Point promotes the abilities of individuals seeking employment through innovative training, education and business partnership, enriching the communities where we work and live.

2. History (including year started)

Job Point is Mid-Missouri's premier employment center. Since 1965, we have been linking people and jobs by providing career planning, occupational skills training and job placement assistance. We specialize in preparing individuals to enter the workforce, while meeting a critical need of the business community. Our services provide people a "hand up" rather than a "handout". Programs are custom designed to prepare each individual to successfully meet the challenges of an ever-changing labor market. Job Point is incorporated as a 501 (c) 3 organization, focusing its resources on creating opportunities for persons with economic disadvantages, disabilities and other barriers to employment. Headquartered in Columbia, Missouri, Job Point was created 51 years ago by the Columbia Cosmopolitan Luncheon Club which realized that, when given the opportunity, all people have a contribution to make. Today, Job Point stands as a nationally recognized leader and innovator, serving more than 10 Missouri counties. In fiscal year 2015, over 400 persons were served. Organizational outcomes included 73% of adult job seekers maintaining employment for at least 90 days. The average hourly workforce entry wage equaled \$10.42 and 98% of customers served (consumers, employers, referring entities and purchasers of service) reported satisfaction with services. Professionalism, national accreditation and experience are the hallmarks that have earned Job Point respect in those communities in which we operate.

3. Regional Profile (regional population; growth projection)

County	Population 2015, US Census, American Fact Finder	Growth Project 2000-2030, Missouri Office of Administration, Budget & Planning
Boone	170,770	50.8%
Audrain	25,783	4.5%
Callaway	29,027	35.2%
Cole	29,051	17.1%
Cooper	29,053	25.8%
Howard	29,089	0.9%
Moniteau	29,135	12.2%
Pettis	29,159	20.2%
Randolph	29,175	12.5%
Saline	29,195	-11.0%

4. Population served (in relation to regional population)

Job Point provides specialized services for

- Adults with disabilities
- Individuals who are unemployed or underemployed
- People with social, economic, legal and/or educational disadvantages
- Persons with physical or mental health conditions, including injuries
- High risk youth ages 17-1/2+

5. Service area (include map, with any routes utilized) See Attachment 1 for Map

Job Point services are based in Columbia, Missouri, of Boone County, and outreach extends throughout the central Missouri area to include Audrain, Callaway, Cole, Cooper, Howard, Moniteau, Pettis, Randolph and Saline Counties. Transportation services are based on individual need. There is no set route or map.

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

Job Point volunteer Board of Directors shall be composed of not less than fifteen (15) persons nor more than twenty-one (21) persons. The current roster includes 18 voting members. Terms are limited to a maximum of two (2) terms of three (3) years each.

C. Notice to the Public

Notifying the Public of Rights under Title VI

Job Point posts Title VI notices on our agency's website, and in public areas of our agency. Job Point does not operate buses or paratransit vehicles, and does not provide public transportation.

Job Point 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 Job Point, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

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If you believe you have been discriminated against on the basis of race, color, or national origin by Job Point, 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 Job Point:

1. You may request a copy by writing to Job Point, **400 Wilkes Boulevard, Columbia, MO 65201**. Information on how to file a Title VI complaint may also be obtained by calling Job Point at **573-474-8560**.

In addition to the complaint process at Job Point, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street, Suite 404, Kansas City, MO 64106.

1. 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.
2. The form must be signed and dated, and include your contact information. If information is needed in another language, contact 573-474-8560.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Job Point'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 Job Point 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 request a copy by writing to Job Point, **400 Wilkes Boulevard, Columbia, MO 65201**. Information on how to file a Title VI complaint may also be obtained by calling Job Point at **573-474-8560**.

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 **Human Resources/Compliance Officer, Job Point, 400 Wilkes Boulevard, Columbia, MO 65201**.

COMPLAINT ACCEPTANCE: Job Point will process complaints that are complete. Once a completed Title VI Complaint Form is received, the Advisor/Instructor will review it to determine if Job Point has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Job Point's Ethics Committee.

INVESTIGATIONS: Job Point's Ethic Committee will generally complete an investigation within five (5) days from receipt of a completed complaint form. If more information is needed to resolve the case, the Compliance Officer may contact the complainant. Unless a longer period is specified by The Compliance Officer, the complainant will have five (5) days from the date of the letter to send requested information to the Ethics Committee 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 Job Point's Ethics Committee determination, the complainant may request an appeal by taking your complaint to Missouri Protection and Advocacy and/or Missouri Coordinating Board for Higher Education. The Compliance Officer will provide you with the telephone number and assist you with the call, if necessary. Job Point fully accepts its responsibility in cooperating fully with Missouri Protection and Advocacy and/or Missouri Coordinating Board for Higher Education to reach a final decision in the matter.

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 Compliance Officer at Job Point, 400 Wilkes Boulevard, Columbia, MO 65201, or at 573-474-8560.

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

See sample
Title VI
Self-Survey Form
ATTACHMENT 3

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in Job Point'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

Job Point's staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Community outreach
- d. Focus groups
- e. Surveys
- f. Social media
- g. Press Releases
- h. Presentations at City Council meetings
- i. Inviting elected officials to event
- j. 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 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. Email inquiries.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to 573-474-8560.

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

Job Point ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Job Point'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. Job Point maintains a Cultural Competency and Diversity Plan. Aligned with the above referenced communication tactics, Job Point 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.

2013 – 2016 Title VI Program Public Engagement Process

Job Point engaged the public during 2013-2016 to ensure compliance with the Title VI program. This process includes community meetings to seek input, providing education, and highlighting 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.

Job Point provides briefings to the Board of Directors and other Advisory bodies.

Comments are accepted at any time via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

Summary of 2013-2016 Public Outreach Efforts

Job Point conducted an outreach survey for input in December 2016
A 95% satisfaction rate was reported.
The only suggestion for improvement was to try to reduce time on the route.

G. Language Assistance Plan

Job Point Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address Job Point'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:

Job Point services are based in Columbia, Missouri, of Boone County, and outreach extends throughout the central Missouri area to include Audrain, Callaway, Cole, Cooper, Howard, Moniteau, Pettis, Randolph and Saline Counties.

Job Point 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 Job Point. 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, Job Point 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 Job Point service area are proficient in the English language. Based on 2015 Census data Estimates, 1.26% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector	Percentage of Population 5 Years and Older
Population 5 Years and Over	424,025	98.74%
Speak English “less than very well”	7520	1.77%
Spanish	7833	1.85%
Speak English “less than very well”	2284	0.54%
Other Indo-European	7325	1.73%
Speak English “less than very well”	2504	0.59%
Asian and Pacific Island	6853	1.61%
Speak English “less than very well”	2520	0.59%
All Other	1946	0.46%
Speak English “less than very well”	212	0.04%

2. Frequency of Contact by LEP Persons with Job Point’s Services:

The Job Point staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, Job Point has had zero requests for an interpreter.

LEP Staff Survey Form

Job Point is studying the language assistance needs of its riders so that we can better communicate with them if needed.

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
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 Job Point to LEP persons:

Outreach activities, summarized in Job Point'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.

<p style="text-align: center;">Outside Organization LEP Survey</p> <p>Organization: Job Point</p> <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 Job Point 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) Job Point has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

Job Point will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to Job Point staff:

1. Information on Job Point 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 Job Point's Title VI Plan requirement.

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

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Board/Committee	Caucasian	Latino	African American	Asian American	Total
Board of Directors	83%	0%	17%	0%	100%
Business Advisory Council	79%	0%	21%	0%	100%

Description of efforts made to encourage minority participation on committees:

- Job Point annually reviews the composition of its Board of Directors and Business Advisory Council to ensure diversity in all aspects, ie: types of businesses represented, race/ethnicity, male/female. In addition, Job Point always strives to ensure consumers/parents are represented as well.

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

Job Point does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

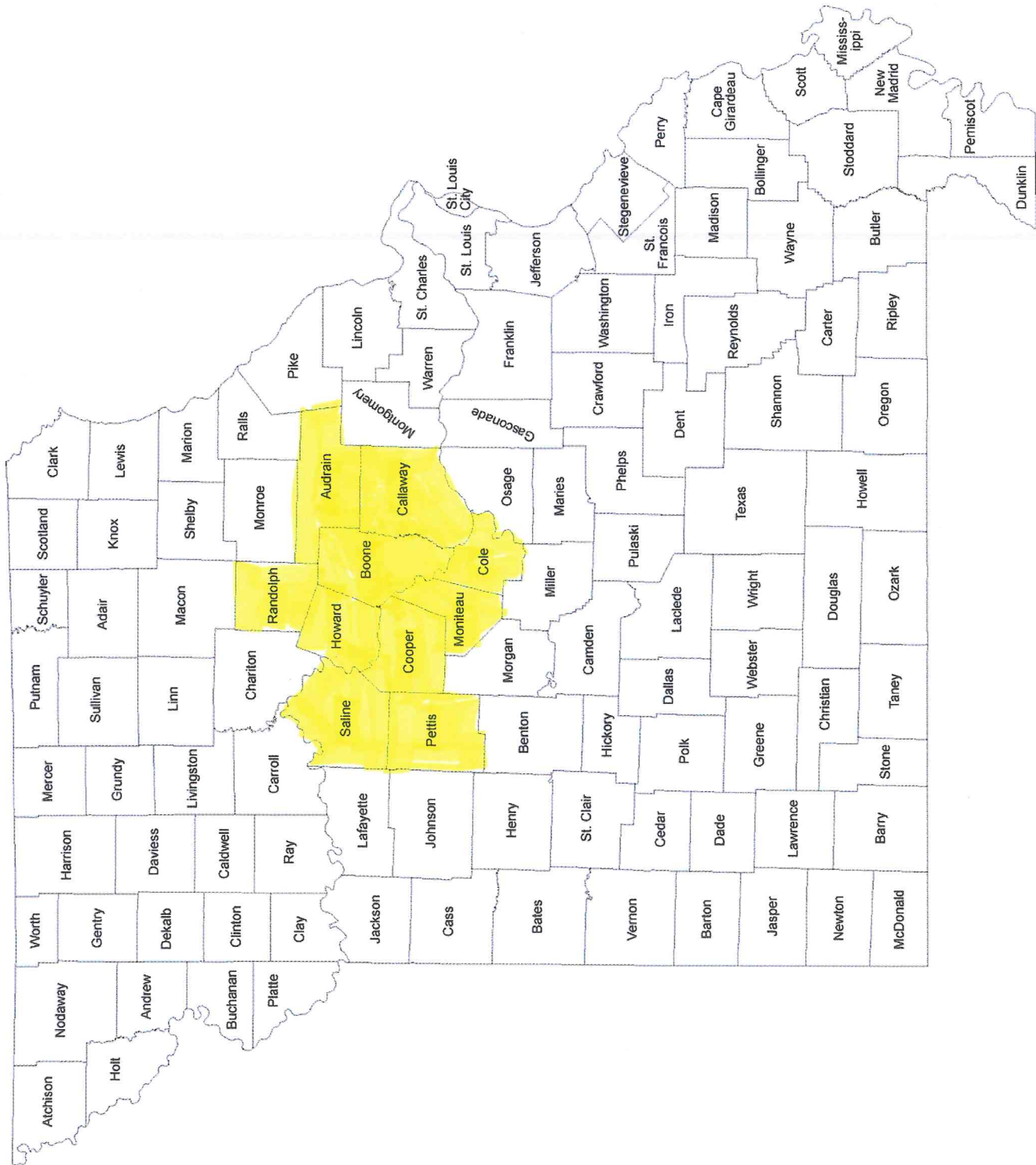
Job Point does not have any subrecipients.

K. Equity Analysis of Facilities

OPTION A

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

Attachment 1- Service Delivery Area Map



Attachment 2

JOB POINT 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:

Compliance Officer
Job Point
400 Wilkes Boulevard
info@jobpoint.org
Phone: 573-474-8560; Fax: 573-474-8575

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:	Zip code:
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

Title VI Self-Survey Form

Date filed with MoDOT Transit Section:

December 22, 2016

DATE

Survey Date: December 22, 2016

Period Covered: January to December 2016

Name of Program/Grant: 5310

- A. Summary of Complaints: NA
- B. Number of complaints for the period: 0
- C. Number of complaints voluntarily resolved: NA
- D. Number complaints currently unresolved: NA
- 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
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 X NO

2. Do new employees receive this information via employee orientation?

YES X NO

3. Is Title VI information provided to all employees and program applicants?

YES X NO

4. Is Title VI information prominently displayed in the organization and on relevant program materials?

YES X NO

5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants.

Updated Title VI Complaint Form

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

None at this time.

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

None.

Signature: _____

Title: President & CEO

Date: December 22, 2016