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## Warren County Pathfinders

### **Title VI Program**

Date Approved by Warren County Pathfinders:

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**April 2, 2025**

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## A. Title VI Assurances

Warren County Pathfinders 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.

Warren County Pathfinders 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. Warren County Pathfinders 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.

Warren County Pathfinders meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Warren County Pathfinders 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, disproportionally high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Signed: \_\_\_Tasha McCarty\_\_\_\_\_

Title: \_\_\_Transportation Coordinator\_\_\_\_\_

Date: \_\_\_April 2, 2025\_\_\_\_\_

## B. Agency Information

### 1. Mission of Warren County Pathfinders

Warren County Pathfinders is committed to serving individuals with intellectual/developmental disabilities in Warren and surrounding counties. Pathfinders is committed to ensure services and programs provide inclusion, independence, and success in life while continually promoting awareness and education in all communities served.

### 2. History

Warren County Pathfinders (WCP), previously, Warren County Handicapped Service (WCHS), began in September of 1986, when the Senate Bill 40 levy mil tax was passed in Warren County. Funding was used to open what was then Warren County Handicapped Services (WCHS) and create needed services for individuals with developmental disabilities, in Warren County. Initial programs included: an integrated preschool, Discovery Plus Adult Recreation Program, and transportation for individuals to and from sheltered workshops in the county.

When the Americans with Disabilities Act (ADA) law passed in 1991 stating that ALL children (including those with disabilities) were to be given a free, public education, WCP's integrated preschool closed, and additional programs and services were added to meet the needs of its residents and families. In the following years, 10 different programs and services were developed to meet those needs.

August 6, 2021, the organization moved into a brand new fully accessible building and began services on August 9, 2021, in their new facility. This is where our administration offices reside along with our first adult day program, Choices is provided. In July 2022, Warren County Handicapped Service (WCHS) made progressive moves beginning with an agency name change. WCHS became Warren County Pathfinders (WCP). This has been a positive move for WCP and all those we support! In the fall of 2023, WCP will be opening their second adult day program, Journeys is opening in Truesdale, MO.

Currently, Warren County Pathfinders provides services/support to over 250 individuals. We offer a variety of services and continuously seeking services to bring to Warren County. Our Executive Leadership team and all those employed with WCP strive to provide the highest quality of service and want to ensure any needs do not go unmet in our community.

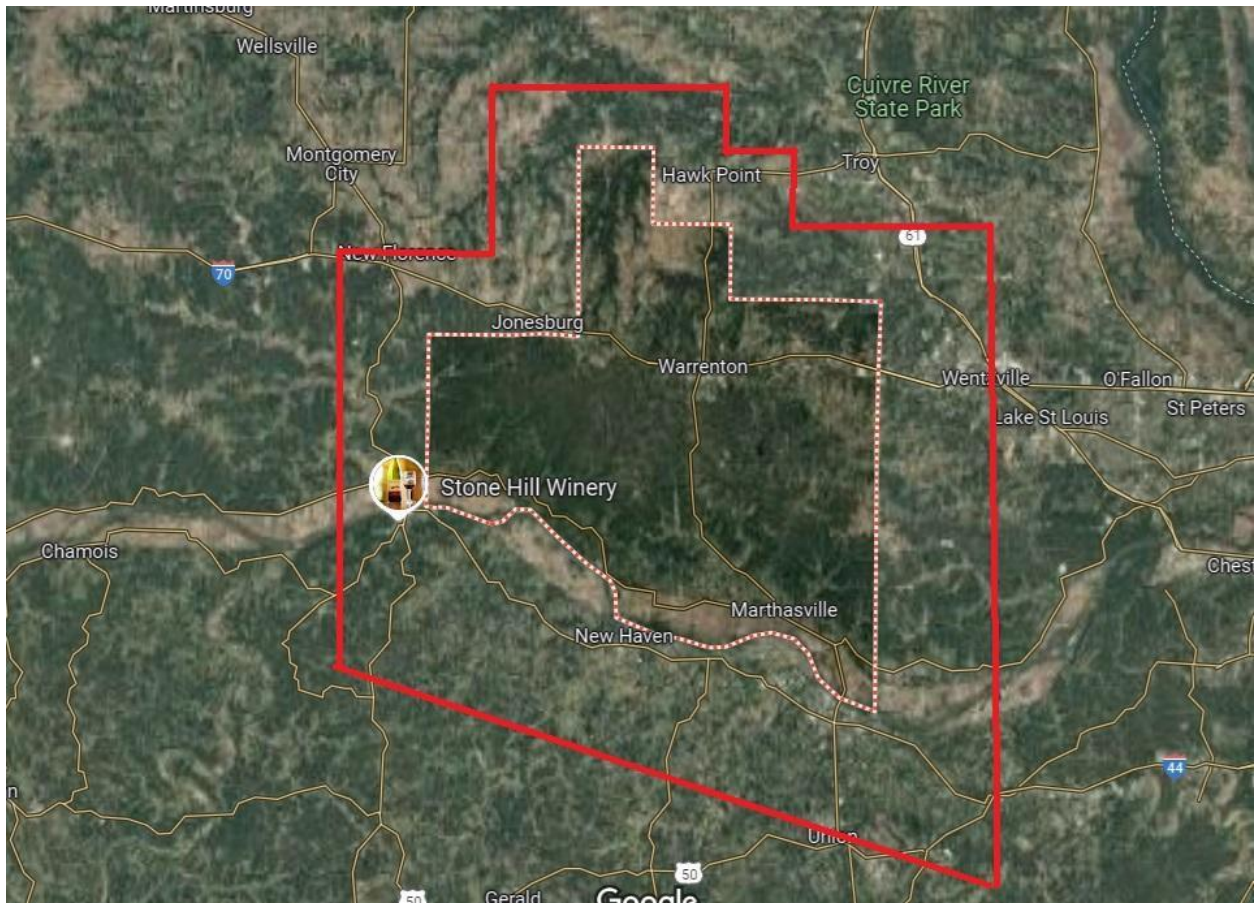
### 3. Regional Profile (regional population; growth projection)

WCP served a total of 122 unduplicated individuals and provides 254 units of service to those individuals in 2019

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

WCP served a total of 167 unduplicated individuals and provides 668 units of service to those individuals in 2021

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



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

President	Kathleen Harnetz	6/30/26
V. President	Greg Houdyshell	6/30/25
Secretary	Jeff Catron	6/30/26
Treasurer	Lysa Stiern	6/30/25
Member	Chris McCall	6/30/25
Member	Jane Hale	6/30/26
Member	Debbie Baker	6/30/26
Member	OPEN	OPEN
Member	OPEN	OPEN
Member	OPEN	Open
Member	Adam Lawler	6/30/27
Member	OPEN	OPEN

## C. Notice to the Public

### Notifying the Public of Rights under Title VI

Warren County Pathfinders posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

Click or tap here to enter text 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.

For more information on the Warren County Pathfinder's Title VI program, and the procedures to file a complaint, contact Tasha McCarty at 636-456-7518 x 10; [tmccarty@warrencountypathfinders.org](mailto:tmccarty@warrencountypathfinders.org); or visit our administrative office at 26321 Dry Fork Rd Warrenton Missouri 63383. For more information visit [www.warrencountypathfinders.org](http://www.warrencountypathfinders.org).

If you believe you have been discriminated against on the basis of race, color, or national origin by Warren County Pathfinders, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact: Tasha McCarty

#### How to file a Title VI/ADA complaint with Warren County Pathfinders:

1. Complaint forms may be obtained at [www.warrencountypathfinders.org](http://www.warrencountypathfinders.org) , in-person at the WCP office located at 26321 Dry Fork Rd Warrenton, Missouri 63383, or by calling 636-456-7518.
2. In addition to the complaint process at Warren County Pathfinders, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5<sup>th</sup> Floor – TCR 1200 New Jersey Ave., 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, dated, and include your contact information.

If information is needed in another language, contact Warren County Pathfinders at 26321 Dry Fork Rd Warrenton, Missouri 63383, or at 636-456-7518.

This Notice is posted on our agency's website, in public areas of our agency, within transit facilities, and within transit or paratransit vehicles.

## D. Procedure for Filing a Title VI Complaint

### Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of WCP'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 WCP 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, in public areas of our agency, within transit facilities, and within transit or paratransit vehicles

You may download the WCP Title VI Complaint Form at [www.warrencountypathfinders.org](http://www.warrencountypathfinders.org) , or request a copy by writing to 26321 Dry Fork Rd. Warrenton Mo, 63383 . Information on how to file a Title VI complaint may also be obtained by calling Tasha McCarty at 636-456-7518 x 10.

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 Tasha McCarty 26321 Dry Fork Rd, Warrenton MO, 63383.

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

INVESTIGATIONS: WCP will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, WCP may contact the complainant. Unless a longer period is specified by WCP, the complainant will have ten (10) days from the date of the letter to send requested information to the WCP 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 the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant disagrees with WCP's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. WCP 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, WCP will issue a determination letter to the complainant upon completion of the reconsideration review.

- A Determination Letter for cases where reconsideration is granted summarizes the allegations, the original finding, the basis for reconsideration, the final findings, and what remedial action(s) are necessary disciplinary action, additional training of the staff member, or other action will occur.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, East Building, 5<sup>th</sup> Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

Warren County Pathfinders will notify the Missouri Department of Transportation of all Discrimination complaints within **72 hours** by contacting the MoDOT Title VI Coordinator via the External Civil Rights main line at (573) 526-2978; or via e-mail at [TitleVI@modot.mo.gov](mailto:TitleVI@modot.mo.gov).

If information is needed in another language, contact Tasha McCarty at 26321 Dry Fork Rd Warrenton MO 63383, or at 636-456-7518 x 10

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

### Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in WCP's complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

During the reporting period, WCP had 0 Title VI Complaints.

### 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

WCP'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?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

The following Title VI training will be provided to WCP's staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and WCP's obligations under Title VI.
2. Information regarding displayed Title VI information and program materials such as the Title VI Nondiscrimination Notice to the Public.
3. Information on WCP's Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on WCP's outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

The Title VI training will be administered in conjunction with training on Warren County Pathfinders' Language Assistance Plan and a summary of the agency's LEP responsibilities as discussed in the later Section G. "Language Assistance Plan."

## F. Public Engagement Plan

### Goal

The goal of the Public Engagement Plan is to have significant and ongoing involvement from agency riders and clients, by all identified audiences, in the public and private participation process for major agency outreach efforts. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin WCP's public and private participation activities.

#### Objectives

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

### Identification of Stakeholders

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

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves the budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- 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

## **Title VI Outreach Best Practices**

Warren County Pathfinders ensures all outreach strategies, communications and involvement efforts comply with Title VI. WCP's Public Engagement Plan for its riders and clientele proactively initiates the involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the involvement process. Aligned with the above referenced communication tactics, Warren County Pathfinders provides the following:

- a. Title VI Non-Discrimination Notice to the Public posted within the following locations:
  - a. The agency's website;
  - b. Public areas of the agency's office(s) such as Warren County Pathfinders;
  - c. Within transit facilities such as WCP;
  - d. Within transit or paratransit vehicles;
- b. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- c. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

### **2024 – 2026 Title VI Program Public Engagement Process**

Warren County Pathfinders will conduct a Public Engagement Process for the 2024-2026 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

WCP will provide briefings to the Board of Directors and Advisory Bodies.

WCP will conduct a 30-day public comment period to provide opportunities for feedback on the 2024-2026 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email @ [tmccarty@warrencountypathfinders.org](mailto:tmccarty@warrencountypathfinders.org)
- b. Mail WCP 26321 Dry Fork Rd Warrenton MO 63383
- c. Phone (636)456-7518x10
- d. In person 26321 Dry Fork Rd Warrenton Mo 63383

### **Three-Year Summary of Public Outreach Efforts**

Warren County Pathfinders participates in the Wright City First Friday's events, Elk's Lodge Events and other community events to draw attention/awareness to the services we offer. WCP goes to area schools to speak about our services as well. Warren County Pathfinders post on social media pages, giving notice about the public comment period providing briefings to our Board of Directors.

## G. Language Assistance Plan

### Warren County Pathfinders Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address WCP'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: Warren County Pathfinders provides services in Warren County and all surrounding counties within a 10-mile radius outside of the Warren County line.

Warren County Pathfinders has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to seek meaningful access to services provided by Warren County Pathfinders. Meaningful access is language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. 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, Warren County Pathfinders 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:

The “Safe Harbor Provision” stipulates a recipient is to provide written translation of vital documents for each eligible Limited English Proficient (LEP) language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population five years of age and older eligible to be served or likely to be affected or encountered.

The U.S. DOT Language Access Plan defines “vital documents” as “paper or electronic written material that contains information that is critical for accessing a component’s programs, services, benefits, or activities; directly and substantially related to public safety; or required by law.” The FTA Circular 4702.1B specifies the Title VI Notice to the Public, Title VI Complaint Procedures, and Title VI Complaint Form are vital documents.

Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Safe Harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Based on the 2023 5-Year American Community Survey data for Table C16001 for WCP’s service area consisting of Warren County 32,933 persons or 97.94% of the total population five years of age and older of 33,688 speak only English. Less than 1% of the total population speak English “less than very well” – a definition of Limited English Proficiency.

Of the LEP Language group(s) that speak English “less than very well”, Spanish had the highest population at 146 or .43% , Indo-European had the second highest population at 47or .14%, and German had the third highest population at 5or .1%. Currently, no LEP language group(s) meet the Safe Harbor threshold. However, efforts will be made to reasonably accommodate any language access requests that arise.

<b><u>LEP Population in City Transit's Service Area</u></b>					
<b>Language Spoken at Home for the Population 5 Years and Over</b>					
<b>Source: 2023: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001</b>					
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Warren County, Missouri</b>			<b>Service Area Total</b>	<b>Percentage of Total Population 5 Years and Older</b>
<b>Total Population 5 Years and Over</b>	33,688	0	0	33,688	100.00%
<b>Speak Only English</b>	32,933			32,993	97.94%
<b>Total</b> Speak English “less than very well”	197	0	0	197	.58%
<b>Spanish</b>					
Speak English “less than very well”	146	0	0	146	0.43%
<b>French, Haitian, or Cajun</b>					
Speak English “less than very well”	0	0	0	0	0.0%
<b>German or other West Germanic languages</b>					
Speak English “less than very well”	5	0	0	5	0.01%
<b>Russian, Polish, or other Slavic languages</b>					
Speak English “less than very well”	0	0	0	0	0.00%
<b>Other Indo-European languages</b>					
Speak English “less than very well”	46	0	0	46	0.14%
<b>Korean</b>					
Speak English “less than very well”	0	0	0	0	0.0%
<b>Chinese (incl. Mandarin, Cantonese)</b>					
Speak English “less than very well”	0	0	0	0	0.0%
<b>Vietnamese</b>					
Speak English “less than very well”	0	0	0	0	0.0%



<b>LEP Population in City Transit's Service Area</b>					
<b>Language Spoken at Home for the Population 5 Years and Over</b>					
<b>Source: 2023: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001</b>					
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Warren County, Missouri</b>			<b>Service Area Total</b>	<b>Percentage of Total Population 5 Years and Older</b>
<b>Tagalog (inc. Filipino)</b>					
Speak English "less than very well"	0	0	0	0	0.0%
<b>Other Asian &amp; Pacific Island languages</b>					
Speak English "less than very well"	0	0	0	0	0.0%
<b>Arabic</b>					
Speak English "less than very well"	0	0	0	0	0.0%
<b>Other and unspecified languages</b>					
Speak English "less than very well"	0	0	0	0	0.0%

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

The Warren County Pathfinders staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, WCP has, on average, 0 per month for an interpreter. WCP averages 0 phone calls per month.

### LEP Staff Survey Form

Warren County Pathfinders 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	

### Language Assistance Requests Log

<u>Date</u>	<u>Language Spoken by Individual (If Available)</u>	<u>Name</u>	<u>Phone Number or Email (If Available)</u>	<u>Service(s) Requested</u>	<u>Staff Member Providing Aid</u>	<u>Notes and Follow-Up</u>

## 3. The importance of programs, activities or services provided by Warren County Pathfinders to LEP persons:

Of the services, benefits and activities offered by Warren County Pathfinders, are yet to encounter, or are likely to encounter, LEP persons. Of those, Warren County Pathfinders has determined the most important are the outreach activities, summarized in WCP's Title VI Public Engagement Plan, which includes 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 in order to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.]

#### Outside Organization LEP Survey

Organization: \_\_\_\_\_ Warren County Pathfinders \_\_\_\_\_

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 Warren County Pathfinders and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, qualified interpreters and translators can be provided.
2. Language identification flashcards and/or "I speak" Cards
3. Bilingual Staff (willing and qualified)
4. Taglines on vital documents informing LEP persons of the availability of translation upon request, and how to obtain them.
5. Automated translation technology (such as Google Translate)

Based on our demographic analysis (Factor 1) Warren County Pathfinders has determined that no language group(s) within its service area meet the Safe Harbor threshold requiring written translated "vital documents" by language group(s). Should Factor 1 in the Four Factor analysis indicate in the future that an LEP group reaches the safe harbor threshold, Warren County Pathfinders will evaluate its vital documents and provide translations.

Warren County Pathfinders will provide assistance and direction to LEP persons upon request.

#### Staff LEP Training

The following training will be provided to Warren County Pathfinders staff:

1. Information on WCP 's Title VI Procedures and Title VI responsibilities pertaining to their specific duties.
2. Information on WCP's Language Assistance Plan and LEP Responsibilities.
3. Information on the written and oral language assistance services available, and instructions on how agency staff can access these products and services.
4. Information on how to respond to LEP callers, written communications from LEP persons, how to respond to in-person contact from LEP persons, and how to arrange providing language assistance services.
5. Use of Language Identification Flashcards such as "I Speak" Cards.
6. Documentation of language assistance requests by maintaining a Language Assistance Requests Log

Warren County Pathfinders will identify staff that are likely to routinely encounter or have frequent contact with LEP persons, as well as their supervisors and all management staff in order to target training to appropriate staff. Click or tap here to enter text. will include the LEP training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons on a [*Enter Frequency*] basis.

### Monitoring and Updating the LEP Plan

The LEP Plan is a component of WCP's Title VI Plan requirement.

Warren County Pathfinders will update the LEP plan as required. The plan will be reviewed and updated on a triennial basis, at minimum, or when it is clear that higher concentrations of LEP individuals are present in the Warren County Pathfinders 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 WCP's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Warren County Pathfinders has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning WCP's failure to meet the needs of LEP individual.

## H. Advisory Bodies

Warren County Pathfinders does not have any non-elected committees and councils, the membership of which is selected by the recipient Subrecipient Assistance

### Subrecipient Assistance

#### Option A

Warren County Pathfinders does not have any subrecipients.

## I. Subrecipient Monitoring

Warren County Pathfinders does not have any subrecipients.

## J. Equity Analysis of Facilities

A Title VI equity analysis will be completed when Warren County Pathfinders constructs facilities, such as storage facilities, maintenance facilities, or operations centers. The term “facilities” does not include bus shelters, transit stations, or power substations. The equity analysis will be conducted during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

The equity analysis is conducted to determine whether the location of the project will result in a disparate impact on minority communities on the basis of race, color, or national origin. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site.

Warren County Pathfinders has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

## K. Fixed Route Transit Providers

Warren County Pathfinders is not a transit provider that operates fixed route service, or transit provider that operates fifty (50) or more fixed route vehicles in peak service and are in an urbanized size area with a population of 200,000 or more.

Thus, the requirements to set system-wide service standards and policies, collect and report demographic data, monitor transit service, and to evaluate service and fare changes, are not applicable to Warren County Pathfinders.

## L. Attachments

“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:

Tasha McCarty  
Warren County Pathfinders  
26321 Dry Fork Rd.  
Warrenton, MO 63385  
636-456-7518x10  
tmccarty@warrencountypathfinders.org

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
2. Accessible Format of Form Needed? ( ) YES specify: _____ ( ) NO		
3. Are you filing this complaint on your own behalf? ( ) YES If YES, please go to question 7. ( ) NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zipcode:
d. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ( ) YES, I have permission. ( ) NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): ( ) Race ( ) Color ( ) National Origin (classes protected by Title VI) ( ) Disability (class protected by ADA) ( ) 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



If information is needed in another language, contact Tasha McCarty at 26321 Dry Fork Rd, Warrenton MO, 63383, or at 636-456-7518x10.