

City of Columbia, Missouri

COLUMBIA TRANSIT

Title VI Program

Date filed with MoDOT Transit Section:

December 31, 2017

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A. Title VI Assurances

Columbia Transit 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.

Columbia Transit 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. Columbia Transit 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.

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

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI 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).

B. Agency Information

1. Mission of Columbia Transit

To safely transport our Customers to their destinations in a reliable and courteous manner.

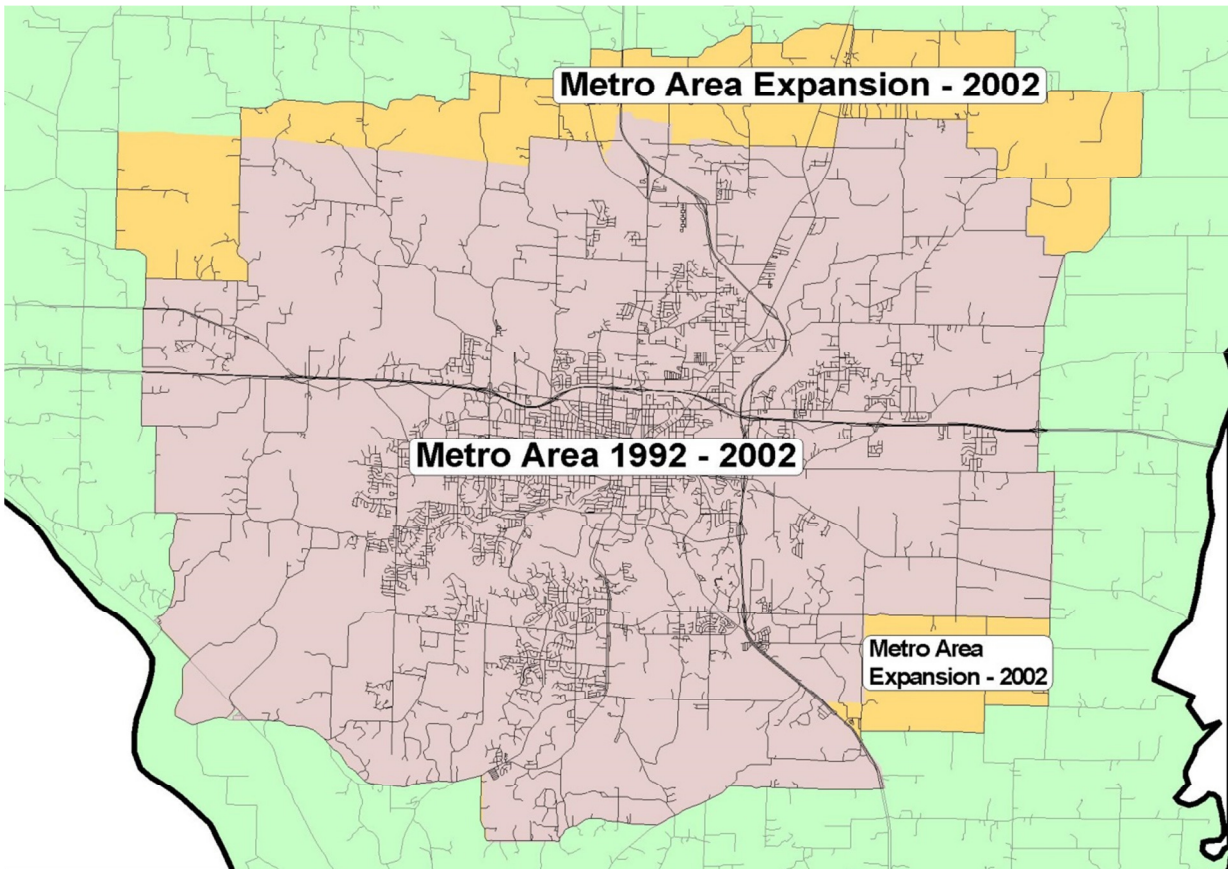
2. History

Columbia Transit began operation on September 9th, 1965 as a Division of the City of Columbia, Public Works Department. Columbia Transit currently operates Fixed Route and ParaTransit service within the City Limits of Columbia, MO. ParaTransit service is offered to the City Limits, exceeding the ADA required $\frac{3}{4}$ of a mile boundary around each Fixed Route. Additionally, Columbia Transit, via an intergovernmental cooperative agreement, operates Tiger Line shuttle services for the University of Missouri, Columbia Campus. This relationship has been in place in some form since the early 1970's.

3. Regional Profile (regional population; growth projection)

Map 1: Columbia Metropolitan Area; shows the City of Columbia and the portion of Boone County addressed by this plan. The Metropolitan Planning (Metro) Area includes the City of Columbia and the surrounding areas in unincorporated Boone County that are projected to urbanize within the next 20 years. The current Metro Area boundary was adopted by the Coordinating Committee in 2002. Transportation Analysis Zones (TAZ's) have been developed for the entire area for eventual traffic analysis. Much of the data found in this report are a mix of Columbia and Boone County statistics which were extracted from 2000 and 2010 Census information or have been developed for the entire area for eventual traffic analysis.

Map 1: Columbia Area Transportation Study Organization – Metro Area Boundary



From 2000 to 2010, the Metro Area population grew by 30,479 people and 29.3%. After considering a variety of potential growth rates, the CATSO Coordinating Committee elected to use a more moderate projection rate than was seen in the previous decade; the chosen projection was based on a percentage of population growth that is near the mid-range of the 1980s (1.15%), 1990s (2.05%), and 2000s (2.93%) Metro Area growth rate.¹ The projection assumes an average effective annual growth rate of 1.5%. The choice of projection rate to forecast population growth for the Columbia Metro Area for the year 2040 was also based on local housing and other demographic data, including data from the 2010 Census, and building permit information from Boone County Resource Management and the City of Columbia.

Using 2010 Census data as the base population for the Metro Area (134,592) and Boone County (162,642), a 1.5% annual growth rate results in a projection of 210,347 and 254,222 people in the year 2040 for the Metro Area and County, respectively. This is an increase of 75,775 people in the Metro Area over the 30 year planning horizon.

¹According to U.S. Census Bureau data, the estimated population for the Metro Area was 104,093 in 2000.

The Metro Area population has historically been near 80% of the County population (76.9% according to 2000 population estimates, and 82.7% according to 2010 Census data). The Metro Area is expected to retain a similar share of the total county population, with a slight percentage gain possible for Metro Area Boundary expansion over time; other growth trends, such as higher growth rates in the City of Columbia than in Boone County, as was seen over the last decade, may also affect this percentage in either direction (from 2000-2010 the City population grew by 28.3% and the County population grew by 20.1%).

Table 1, presented below, shows population projections for the CATSO Metro Area, the City of Columbia, and Boone County from 2010-2040 using 2010 Census data for the base year, and a 1.5% compounding annual growth rate.

Table 1: Population Projections 2010-2040

	2010	2015	2020	2025	2030	2035	2040
CATSO METRO AREA	134,592	144,994	156,200	168,271	181,276	195,286	210,378
CITY OF COLUMBIA	108,500	116,885	125,919	135,650	146,134	157,428	169,594
BOONE COUNTY	162,642	175,212	188,753	203,340	219,055	235,985	254,222

1.5% Growth Rate

Regular monitoring of local growth trends will allow for the adjustment of these figures over time, and formal adjustment will occur as the transportation plan is updated every 5 years.

4. Population served (in relation to regional population)

According to the 2010 Census, 93,000 people are within ½ mile of all current bus routes and that number will not change as it pertains to the Go COMO routes. This represents roughly eighty-six (86) percent of the population. Columbia Transit does not currently track the number of people that board and exit their buses.

5. Service area

Current service consists of a networked system of routes with two core connector routes traveling east/west and north/south on 15 minute headways in peak service. Seven neighborhood routes and one downtown orbiter connect to the two main routes on 30 minute headways in peak service. Additionally, a commuter route travels into the county with trips in the morning and late afternoon only. [See **Appendix A** for full page map of proposed fixed routes]

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

Columbia Transit is a service offered by the City of Columbia, Missouri. Its governing board is the Columbia City Council.

COLUMBIA CITY COUNCIL - 2017

Name	Ward	Term Expires
Brian Treece	Mayor	April 2019
Clyde Ruffin	Ward 1	April 2020
Michael Trapp	Ward 2	April 2018
Karl Skala	Ward 3	April 2019
Ian Thomas	Ward 4	April 2019
Matt Pitzer	Ward 5	April 2020
Betsey Peters	Ward 6	April 2018

C. Notice to the Public

Notifying the Public of Rights under Title VI COLUMBIA TRANSIT

Columbia Transit 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.

Columbia Transit 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 Columbia Transit, 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 Columbia Transit:

1. To request additional information on Title VI or to file a complaint, contact us at (573) 874-7282; email transit@gocolumbiamo.com; or visit our administrative office at Wabash Station, 126 N. 10th St, Columbia, MO 65201. For more information, visit our website at www.gocomotransit.com.
2. In addition to the complaint process at Columbia Transit, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th 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 and dated, and include your contact information.

If information is needed in another language, contact (573) 874-7282.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The following complaint procedures apply to the beneficiaries of Columbia Transit'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 Columbia Transit 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 download the *Columbia Transit Title VI Complaint Form* at www.gocomotransit.com, or request a copy by writing to City of Columbia, Transit, P.O. Box 6015, Columbia, MO 65205. Information on how to file a Title VI complaint may also be obtained by calling Columbia Transit at (573) 874-7282.

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 Columbia Transit, P.O. Box 6015, Columbia, MO 65205.

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

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

the letter to send requested information to the Columbia Transit 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 Columbia Transit's investigator reviews the complaint, the 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.

REQUEST FOR RECONSIDERATION: If the complainant disagrees with Columbia Transit's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI Coordinator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The City of Columbia's Title VI Coordinator 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, the Title VI Coordinator will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact Columbia Transit at City of Columbia, Transit, P.O. Box 6015, Columbia, MO 65205, or at (573) 874-7282.

[See **Appendix B** to view a copy of Columbia Transit's Discrimination Complaint Form]

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

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in Columbia Transit’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency shall designate a Columbia Transit employee to 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

Evidence of Agency Staff Title VI Training

Columbia Transit’s staff is given Title VI training, and agency can answer affirmatively to all the following:

- ✓ New employees made aware of Title VI responsibilities pertaining to their specific duties
- ✓ New employees receive this information via employee orientation
- ✓ Title VI information is provided to all employees and program applicants
- ✓ Title VI information is prominently displayed in the agency and on any program materials distributed

COLUMBIA TRANSIT

Title VI Self-Survey Form

Date filed with MoDOT Transit Section:

March 31, 2014

Survey Date: December 28, 2017
Period Covered: March 2014 – December 2017
Name of Program/Grant: Urbanized Area Formula Grants / 5307

- A. Summary of Complaints, Investigations, or Lawsuits:
No complaints were received for this period.
No transit-related investigations were conducted for this period.
No lawsuits were received for this period.
- B. Number of complaints for the period: 0
- C. Number of complaints voluntarily resolved: 0
- D. Number complaints currently unresolved: 0
- 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)

Columbia Transit received zero (0) Title VI Complaints during the March 2014 to December 2017 period. There were no transit-related Title VI investigations and there were no lawsuits.

Columbia Transit 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.

Columbia Transit has improved training for its employees (new and current) by creating a power point presentation [see **Appendix C** for a copy of the training materials]. This information is provided to employees once per year. It also reviewed and improved its Title VI language on its website.

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

Columbia Transit is in the process of revamping its Rider Handbook to modernize the book and provide better notice to the public and further guidance to its employees of our Title VI obligations.

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

No problems encountered for this period.

Signature: /s/ Drew Brooks
Title: Multi-Modal Manager, Columbia Transit
Date: December 28, 2017

F. Columbia Transit's Public Engagement Plan

Public Engagement Plan Goal

Public participation is a critical component of transportation planning. The Columbia Transit's Public Participation Plan is intended to develop and utilize a plan that provides reasonable opportunities for interested parties to comment on Columbia Transit's services and projects.

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

Columbia Transit stakeholders (those directly or indirectly affected by systems & service plans) include, but are not necessarily limited to, the following:

- Governing Agency
 - Columbia City Council
- Advisory Agencies
 - Columbia Public Transit Advisory Commission
 - Columbia Area Transportation Study Organization (CATSO)
 - Columbia Disabilities Commission; Columbia Human Rights Commission
- Columbia Transit Riders & Clients
- City of Columbia Minority & Low Income Populations (including limited English proficient persons)
- Local Jurisdictions and Other Government Stakeholders
 - Federal Transit Authority (FTA)
 - Missouri Department of Transportation (MoDOT)
 - Columbia Housing Authority
- Private Businesses & Organizations
 - Student Population: University of Missouri, Columbia College, Stephens College
 - Taxi Businesses: Taxi Terry, Tiger Taxi, Columbia Taxi, Economy Cab, Rick's Taxi
 - Other Transportation Businesses: First Student Transportation, Mo-X
 - Service Orgs: Boone County Family Resources, ACT, Services for Independent Living, Voluntary Action Center, Heart of Missouri United Way, Phoenix Programs, Rainbow House, Boone County Council on Aging, Boys and Girls Town of Missouri, Job Point, Refugee & Immigration Services

Public Notice

Columbia Transit will make a continuing effort to inform the public and interested parties of Columbia Transit's purpose and responsibilities. The agency will provide this information through handouts including brochures or posters, information on its web page, speaking engagements with business, professional and civic organizations, and periodic press releases.

All meetings for public participation shall be at times and locations that are convenient and accessible to everyone, particularly for minority and LEP communities. Columbia Transit will provide reasonable public notice for meetings and members of the public attending the meetings may offer comments for the record on transportation matters.

Public Engagement Process/Outreach Efforts

Columbia Transit will engage minority and LEP populations in the city, and we will do this by our comprehensive practices and targeted outreach efforts. The current comprehensive practices aim to reach minority and LEP populations to not only provide services but to also receive feedback and to engage them in Transit's planning: Transit provides language line translation services for all persons needing to communicate with staff, this service is advertised on all buses and at the Wabash Station, there are also language cards for drivers and staff to use to help identify the language spoken by the customer. Also, this information and more can be found on Transit's website which can be browsed in several different languages. By providing these notices and services, the goal is for Transit to be open, available and welcoming to all members of the community.

Columbia Transit conducts outreach programs in the community to receive public input on its planning and to raise awareness of its services. As part of the effort to engage the minority and LEP populations in its planning, Transit will target some wards with a higher density of minority and LEP populations. This includes Wards 1 and 3. Transit will host their outreach programs in community buildings of these wards to engage the residents of that ward. Transit will advertise the public meetings and host them at times that are convenient and accessible to everyone.

Transit also works with social service organizations in the community that have more frequent contact with minority and LEP populations. Two of these organizations are Refugee & Immigration Services and the University of Missouri, International Center. These organizations regularly provide services to minority and LEP populations in the community. Columbia Transit has partnered with both to provide orientation to the public transit system for their customers and to provide an easy contact with the organization for easy communication of questions and comments. Transit will continue to have regular contact with the organizations and meet with them throughout the year.

Public Comment

Formal public comment periods are used to solicit comments on major public involvement efforts around a Columbia Transit service or system change. Comments during these periods are accepted through various means:

- Email: Transit@como.gov
- Mail: City of Columbia, Transit, P.O. Box 6015, Columbia, MO 65205
- Phone: (573) 874-7282
- In person: Wabash Station, 126 N. 10th St, Columbia, MO 65201

Response to Public Input

All public comments are gathered and provided to the Transportation Superintendent and Multi-Modal Manager. When pertinent, a report is presented to the City Council and Public Transit Advisory Commission for their review and input. Comments and suggestions are incorporated into the planning process.

Title VI Outreach Best Practices

Columbia Transit ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Columbia Transit's Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, Columbia Transit provides the following:

- Public notices published in non-English publications
- Title VI non-discrimination notice on its website
- Agency communication materials available in languages other than English
- Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2017 – 2020 Title VI Program Public Engagement Process

Columbia Transit will conduct a Public Engagement Process for the 2013-2016 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Columbia Transit will provide briefings to the Columbia City Council and Advisory Bodies.

Columbia Transit will conduct a 30 day public comment period to provide opportunities for feedback on the 2017-2020 Title VI Program.

Comments are accepted during the public outreach period via:

- Email: Transit@como.gov
- Mail: City of Columbia, Transit, P.O. Box 6015, Columbia, MO 65205
- Phone: (573) 874-7282
- In person: Wabash Station, 126 N. 10th St, Columbia, MO 65201

G. Language Assistance Plan

Columbia Transit Limited English Proficiency Plan

Policy

Columbia Transit strives to ensure that all segments of the population, including LEP persons, are provided with meaningful access to its programs, services and planning. It is the policy of Columbia Transit to provide meaningful access to persons who are limited in English proficiency.

Title VI Responsibilities

This Limited English Proficiency Plan has been prepared to address Columbia Transit'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, which prohibits discrimination in the level and quality of transportation service based on race, color or national origin..

Differing treatment based upon a person's inability to speak, read, write or understand English can be a type of discrimination. Columbia Transit is dedicated to ensuring that such discrimination does not take place.

LEP Persons

LEP persons are those whose proficiency in speaking, reading, writing, or understanding English, as a result of national origin, is such that it would deny or limit their meaningful access to programs and services provided by Columbia Transit if language assistance were not provided. Columbia Transit assists LEP individuals, as outlined in this plan, in accessing its programs and services and Columbia Transit is committed to continuing to improve this access.

Analysis

Part of Columbia Transit's policy of providing meaningful access to LEP persons is understanding the current conditions surrounding this issue. It is necessary to understand the LEP population in Columbia Transit's service area, to determine the frequency with which LEP persons use its programs and services, to evaluate the importance of the various programs and services, and to consider the resources available.

Number And Proportion of LEP persons eligible to be served by Columbia Transit

Columbia Transit surveyed the LEP population of residents within the Columbia city limits, including some adjacent portions outside of the city limits. [See **Appendix D** for LEP Population Chart by Census Tract, See **Appendix E** for Population by Language: Asian & Pacific, See **Appendix F** for Map of Census Tracts]. A significant majority of people in the Columbia Transit service area are proficient in the English language. Based on the 2010 Census data, approximately 3.8% of the population five years of age and older speak English “less than very well.” See the table below for the populations by numbers and percentage.

	Totals
SERVICE AREA	
Population (5 Years and Over)	125,878
LIMITED ENGLISH PROFICIENCY	
LEP %	3.8%
LEP #	4,721
SPANISH	
Spanish % (5 Years and Over)	2.20%
Spanish #	2,733
Spanish LEP%	0.80%
Spanish LEP#	1,047
OTHER INDO-EUROPEAN (OIE)	
OIE % (5 Years and Over)	2.60%
OIE #	3,221
OIE LEP %	0.50%
OIE LEP #	680
ASIAN & PACIFIC	
Asian & Pacific % (5 Years and Over)	3.40%
Asian & Pacific #	4,228
Asian & Pacific LEP %	1.90%
Asian & Pacific LEP #	2,333
ALL OTHER	
All Other % (5 Years and Over)	1.50%
All Other #	1,871
All Other LEP %	0.50%
All Other LEP #	649

Nature and importance of the program, activity

Public transportation is vital to many people's lives. According to the Department of Transportation's Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons, "Providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effective public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment."

Columbia Transit offers fixed route services for everyday transportation needs, paratransit services to provide equal access to persons with disabilities, public meetings to receive public input and outreach events to inform the community of the services. All of these are very important to Columbia Transit's operations and to the public.

Resources available to Columbia Transit for LEP outreach

Resources that have been, or may be useful in Columbia Transit's LEP efforts include collaborating with service agencies or organizations in the community that have more frequent, personal contact with the LEP population in Columbia. These organizations include, but are not necessarily limited to, the University of Missouri – International Center, Centro Latino, Refugee and Immigration Services. The cost to collaborate with these organizations is low as it only requires staff time. There is benefit to this type of targeted outreach has been significant.

Another resource available to Columbia Transit for LEP outreach is to continue including Language Services information on the information that goes out to advertise an outreach event. The cost to include this information is low and the benefit is significant.

Lastly, targeting outreach efforts to areas where the LEP population is higher. According to our LEP information, the LEP population is greater than 350 people in tracts 5, 7, 14 and 15.04. These areas are in the center of town and in the north of town (North of I-70). Targeted outreach efforts, particularly when it concerns improving LEP related services, to these parts of the community can be beneficial. The cost of these outreach efforts is low and the benefit can be great.

Monitoring, Evaluating and Updating the Language Assistance Plan

Columbia Transit monitors changes in the LEP population, tracks all LEP requests and updates this plan as needed. Every three (3) years this plan will be formally evaluated. In order to do that, Columbia Transit will determine whether there have been changes in the LEP population in Columbia by looking at the most recent census information. It will also gather records all of the LEP requests during the period (these requests will be tracked in a log kept by Transit). Also, Columbia Transit will seek out public feedback on the Language Assistance Plan from all stakeholders including riders, service organizations, general public and staff. Once the information is gathered, the Multi-Modal Manager or Transportation Superintendent, in collaboration with the Title VI Coordinator for the City, will evaluate the LEP plan and update the information. This plan is also available to the public on the City's website and upon request. Columbia Transit will accept and record

public comment on the plan at any time. Finally the plan will be submitted to our governing body, Columbia City Council, for approval.

Proposed Actions

Columbia Transit strives to ensure that all segments of the population, including LEP persons, are provided with meaningful access to its programs, services and planning. Columbia Transit has adopted this LEP plan to ensure that this goal is achieved in a manner that is both effective and efficient. Consistent with the analysis of the LEP population, Columbia Transit's limited financial resources, and its policy, Columbia Transit offers the following:

Language Assistive Services

Columbia Transit staff provides language assistive services for oral and written communications, as needed. Staff will contact CTS Language Link for all oral communications. Additionally, staff will make any written communications available in another language.

All buses contain a language card for Bus Drivers to use to help identify the language spoken by a customer. Drivers are instructed to refer the Customer to a dispatcher who can access the Language Line or a member of staff who speaks the language, if necessary. To date, this has not been necessary. A list of staff who speak various languages and instructions for accessing the Language Line are kept in the LEP log book at the Dispatch Desk.

Annually Transit works with the University of Missouri International Center to provide information on public transportation to their students. Typically, at the beginning of each school year, we provide a short trip from the International Center on the MU campus to our main Customer Service office at the Wabash Station. During the trip a staff member will discuss the basics of the service and answer questions. At the station maps and materials are provided and additional staff are on hand to answer further questions.

Columbia Transit is continually looking for new ways to improve on current processes and outreach. Public feedback is always accepted directly to Columbia Transit or through the Public Transit Advisory Commission, which is continually monitoring services.

Notice to LEP persons about language assistive services

Language Services information is displayed in all Columbia Transit Service vehicles and at the main transfer center in the Wabash Station. [See **Appendix G** for Signage]. This information indicates how interpreters may be requested. Title VI information is also displayed on Columbia Transit's website at gocolumbiamo.com, including Language Services information.

Staff Training

All Columbia Transit staff are trained on LEP procedures in orientation. Refresher training for all staff is administered once each year at all employee meetings.

H. Advisory Bodies

Description of efforts made to encourage minority participation on committees:

- **Columbia Public Transit Advisory Commission:** This commission is comprised of eleven (11) members. They advise city staff with regard to transit policy and safety matters, serve as a sounding board for citizen transit issues and make recommendations to City Council. The positions are advertised by the City Clerk and appointed by City Council. Members are appointed without regard to race.
- **Columbia Area Transportation Study Organization (CATSO):** This commission is comprised of a Coordinating Committee and a Technical Subcommittee. The Coordinating Committee is comprised of nine (9) members with the option for three (3) ex-officio members. The Technical Subcommittee is comprised of eleven (11) members with the option for four (4) ex-officio members. There is some overlap in that some people serve on both committees within CATSO. The membership is based on professional job positions held with various agencies in the community.
- **Columbia Disabilities Commission:** This commission is comprised of twelve (12) members, seven (7) shall be persons with significant disabilities, two (2) shall own or operate a business, and three (3) shall have particular knowledge or experience in providing services to people with disabilities. The positions are advertised by the City Clerk and appointed by City Council. Members are appointed without regard to race.

I. Subrecipient Assistance

Subrecipient Assistance

Columbia Transit does not have any subrecipients.

I. Subrecipient Monitoring

Subrecipient Monitoring

Columbia Transit does not have any subrecipients.

J. Equity Analysis of Facilities

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

L. System-Wide Service Standards and Policies

SERVICE STANDARDS

Background

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators:

- *Vehicle load for each mode*: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative the vehicle's maximum load point.
- *Vehicle headways for each mode*: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- *On-time performance for each mode*: A measure of runs completed as scheduled.
- *Service availability for each mode*: A general measure of the distribution of routes within an agency's service area.

Vehicle Load Standards

- 40 ft Low Floor Bus – Max Load: 39 Seated, 2 Wheelchairs, 25 Standees
 - 66 total, Max Load Factor 1.38
- 35 ft Low Floor Bus – Max Load: 32 Seated, 2 Wheelchairs, 18 Standees
 - 52 total, Max Load Factor 1.35
- 30 ft Low Floor Bus – Max Load: 25 Seated, 2 Wheelchairs, 15 Standees
 - 42 total, Max Load Factor 1.36
- 27 ft Cutaway Van – Max Load: 8 Seated, 4 Wheelchairs, 0 Standees
 - 12 Total, Max Load Factor 1.0

Vehicle Headway Standards

- Fixed Route service headways are 30 minutes in peak service.

On-Time Performance Standards

- Ninety (90) percent of the City's transit vehicles will complete their established runs no more than five (5) minutes early or late in comparison to the established/published timetables.
- A vehicles is considered on time if it departs a scheduled timepoint no more than one (1) minute early and no more than five (5) minutes late. The City's on-time performance objective is ninety (90) percent or greater.

Service Availability Standards

- Bus Stops will not be more than 1200 feet apart.
- Where available, stops should have sidewalk access and street lights in close proximity.

SERVICE POLICIES

Background

FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures.

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

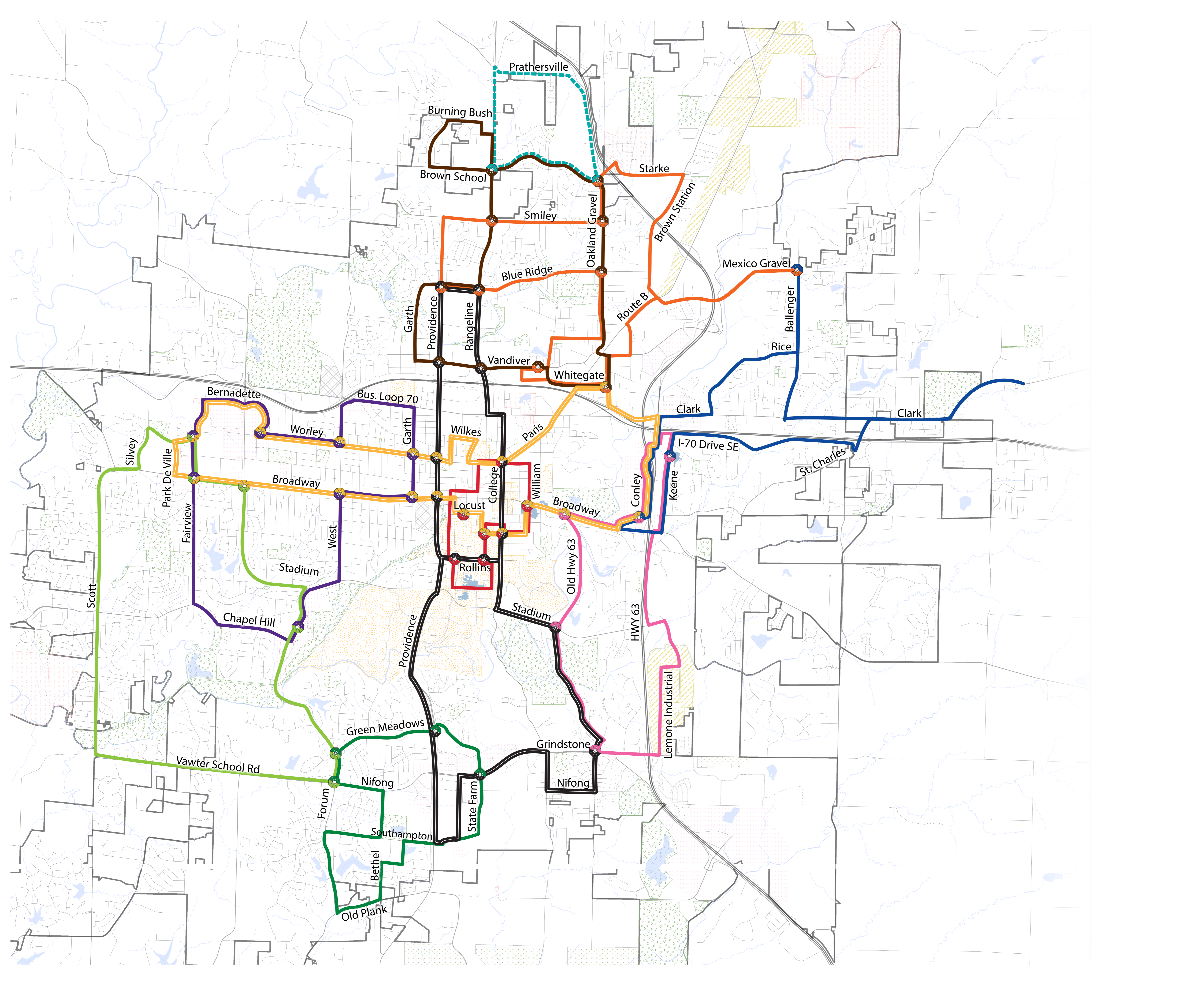
- Buses are rotated on a quarterly basis to evenly distribute mileage.
- Higher capacity vehicles are assigned to heavy use routes as applicable.
- All vehicles will be ADA accessible on all routes.

Transit Amenities Policy

- All bus stops require a bus stop sign.
- Shelters and benches are currently distributed based on passenger volume and customer request. This process will be re-evaluated as the system moves to a network model with multiple transfer locations.
- All bench and shelter locations will have a trash receptacle.

APPENDIX A

Columbia Transit – Go COMO Fixed Routes



Prathersville

Burning Bush

Brown School

Smiley

Starke

Blue Ridge

Oakland Gravel

Brown Station

Mexico Gravel

Garth

Providence

Rangeline

Vandiver

Whitegate

Route B

Rice

Ballenger

Clark

Bernadette

Bus. Loop 70

Worley

Garth

Wilkes

Paris

Silvey

Park De Ville

Fairview

Broadway

West

Stadium

Chapel Hill

Locust

College

William

Broadway

Conley

Keene

I-70 Drive SE

St. Charles

Scott

Rollins

Stadium

Old Hwy 63

HWY 63

Lemone Industrial

Grindstone

Nifong

State Farm

Nifong

Southampton

Bethel

Old Plank

Forum

Vawter School Rd

APPENDIX B
COLUMBIA TRANSIT 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:

City of Columbia
 Public Works, Transit
 P.O. Box 6015
 Columbia, MO 65205
 Transit@GoColumbiaMo.com

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home () - 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)		

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

APPENDIX C
Title VI & ADA Training Materials

ADA/504 & Title VI Training

Go COMO
Training Materials – 2017

Introduction

- ▶ Purpose of Nondiscrimination Requirements
 - Equal opportunity, taxpayer funded
 - Better customer service
- ▶ Protected Category & Federal Laws
 - Disability
 - Americans with Disabilities Act (ADA)
 - Section 504 of the Rehabilitation Act (504)
 - Race, Color, National Origin
 - Title VI of the Civil Rights Act of 1964

ADA/504 Overview

- ▶ Overview
 - Transit shall not discriminate based on disability
 - Cannot exclude, deny benefits, or discriminate in any of Transit's services programs or activities
 - Meet facility ADA standards (clear path of travel, accessible parking , restrooms, etc.)
 - Make reasonable accommodations to encourage equal opportunity for all customers

ADA/504 Scope

- ▶ Applies to ALL transit services, programs and activities
 - E.g., fixed route, paratransit, parking, website, communications, employment, tenants
 - ...EVERYTHING

ADA/504 Documents & Services

- ▶ Notice to Public of Rights
 - Signs posted on site and on website
 - ADA Coordinator available
- ▶ Reasonable Accommodations
 - If simple, then provide
 - If complicated, then speak to Management or ADA Coordinator
- ▶ Grievances
 - Notify customers of grievance opportunity
 - Provide copy of grievance form and procedure upon request

Title VI Overview

- ▶ Title VI
 - Transit shall not discriminate based on race, color, national origin
 - Language assistive services to customers with limited english proficiency
- ▶ Title VI Scope
 - Applies to EVERYTHING; all programs, services and activities; just like ADA/504

Title VI Language Assistance Services

- ▶ Oral
 - Identify need for interpreter, identify language
 - Contact CTS Language Link by telephone
 - Assist customer through telephone interpreter
- ▶ Written
 - Notify manager or Title VI Coordinator

Title VI Documents & Services

- ▶ Notice to Public
 - Signs for nondiscrimination and language assistance services posted on site and on website
 - Title VI Coordinator available
- ▶ Documents
 - Title VI Plan
 - Language Assistance Program Plan
 - Title VI Regulations
- ▶ Grievances
 - Notify customers of grievance opportunity
 - Provide copy of grievance form and procedure upon request

EXAMPLE 1

- ▶ A.
 - Larry has a vision impairment and is not able to see the signs in Wabash station discussing fares for trips. He requests assistance. What do you do?
- ▶ B.
 - Larry would like the a paper copy of the fares to be printed in braille so that he can independently make his selection in the future. What do you do?
- ▶ C.
 - While leaving, Larry tells you he believes the Wabash station bathrooms are not compliant with ADA standards. What do you do?

Example 2

- ▶ A.
 - Mary is a customer, she is speaking to you but it is in a different language. You don't understand what she is saying but she seems upset. What do you do?
- ▶ B.
 - You now understand Mary believes she was denied the opportunity to enter the post-security terminal because of her race. What do you do?
- ▶ C.
 - Mary is requesting a copy of the City ordinances related to transit in her own language. What do you do?

QUESTIONS?

Contact Info:

Adam Kruse
Assistant City Counselor
City ADA/Title VI Coordinator
(573) 817-5024
Adam.Kruse@CoMo.gov

APPENDIX D

LEP Population Chart by Census Tract

Census Tract Population (5 Years and Over)	LEP POPULATION IN COLUMBIA TRANSIT SERVICE AREA																								
	2	3	5	6	7	9	10.01	10.02	11.01	11.03	11.04	12.01	12.02	13	14	15.02	15.03	15.04	16.01	16.02	17.02	18.05	21	21 Total	
1783.0	3420.0	2699.0	4661.0	3840.0	1389.0	4008.0	6071.0	7841.0	6268.0	9905.0	5563.0	5380.0	3429.0	10148.0	5533.0	3284.0	8078.0	6857.0	3053.0	4249.0	7795.0	3227.0	7157.0	125878.0	
6.7%	4.9%	16.6%	3.7%	5.5%	1.6%	1.3%	2.7%	3.4%	2.8%	0.7%	3.2%	4.0%	5.2%	5.5%	2.3%	2.2%	6.2%	1.9%	1.3%	3.2%	3.1%	3.7%	2.3%	3.75%	
119.5	167.6	487.9	172.5	364.8	19.4	52.1	165.9	266.6	175.5	69.3	178.0	215.2	178.3	558.1	127.3	72.2	500.8	130.3	95.7	156.0	241.6	119.4	184.6	4720.7	
1.0%	3.0%	1.4%	3.5%	10.1%	3.7%	1.6%	1.8%	2.0%	1.9%	1.1%	0.7%	1.2%	1.5%	3.8%	1.3%	1.1%	0.9%	4.4%	2.9%	2.1%	0.6%	2.7%	1.2%	2.2%	
18	102	41	163	388	52	66	108	153	116	105	39	62	52	384	73	35	76	301	88	91	47	88	85	2733	
55.6%	11.8%	26.8%	35.6%	63.1%	36.5%	0.0%	33.3%	19.6%	17.2%	0.0%	53.8%	33.9%	34.6%	72.9%	75.3%	48.6%	0.0%	23.6%	27.5%	69.2%	0.0%	31.8%	9.4%	0.8%	
10.0	12.0	11.0	58.0	244.8	19.0	0.0	36.0	30.0	20.0	0.0	21.0	21.0	18.0	279.9	55.0	17.0	0.0	71.0	24.0	63.0	0.0	28.0	8.0	1046.7	
Other Inbo-European (5 Years and Over)	1.6%	2.5%	9.8%	0.3%	2.0%	0.0%	1.9%	1.2%	2.5%	1.9%	6.2%	6.5%	7.0%	3.3%	0.0%	0.1%	1.5%	0.7%	0.5%	3.9%	4.4%	1.8%	2.5%	2.6%	
Other Inbo-European#	29	87	288	14	78	0	61	38	91	156	184	346	349	240	335	0	4	118	45	15	165	58	178	3221.0	
OIE LEP #	41.4%	12.6%	37.8%	0.0%	0.0%	0.0%	0.0%	44.7%	27.5%	9.6%	5.5%	16.9%	25.8%	47.5%	0.0%	0.0%	28.0%	0.0%	0.0%	43.6%	7.3%	0.0%	26.4%	0.5%	
OIE LEP %	12.0	11.0	108.9	0.0	0.0	0.0	17.0	25.0	15.1	19.0	59.0	61.9	59.0	0.0	0.0	33.0	0.0	0.0	0.0	71.9	25.0	0.0	47.0	679.9	
Asian & Pacific	7.1%	4.3%	17.1%	1.9%	0.8%	0.0%	2.2%	3.1%	5.4%	3.3%	1.7%	2.9%	3.6%	11.2%	2.0%	3.6%	1.3%	1.9%	1.9%	0.2%	4.3%	2.9%	1.4%	3.4%	
Asian & Pacific #	127	148	504	89	29	0	90	189	427	209	166	162	191	983	208	199	43	379	133	16	8	334	92	103	4238.0
A & P LEP %	77.2%	80.4%	73.2%	92.1%	55.2%	0.0%	32.2%	57.1%	45.0%	67.0%	24.1%	85.8%	59.7%	25.3%	55.3%	9.3%	100.0%	49.1%	43.2%	100.0%	0.0%	64.7%	81.5%	61.2%	1.9%
A & P LEP #	98.0	119.0	368.9	82.0	16.0	0.0	29.0	107.9	192.2	140.0	40.0	199.0	114.0	96.9	115.0	18.9	43.0	186.1	57.0	16.0	0.0	216.1	75.0	63.0	2333.1
All Other#	7	25	0	187	113	5	46	0	56	125	245	180	161	0	6	67	16	472	0	0	32	0	61	67	1871.0
All Other LEP %	0.0%	100.0%	0.0%	18.2%	91.2%	0.0%	50.0%	0.0%	32.1%	0.0%	7.3%	0.0%	11.8%	0.0%	0.0%	79.1%	68.8%	60.2%	0.0%	0.0%	0.0%	0.0%	24.6%	68.7%	0.5%
All Other LEP #	0.0	25.0	0.0	34.0	103.1	0.0	23.0	0.0	18.0	0.0	17.9	0.0	19.0	0.0	0.0	53.0	11.0	284.1	0.0	0.0	0.0	0.0	15.0	46.0	649.1

% of Pop 5 & Over		1.5%	.6%	1.2%	2.5%
Speak English “less than very well”	0	0	44.7%	27.5%	9.6%
Asian and Pacific Island	0	90	189	427	209
% of Pop 5 & Over		2.2%	3.1%	5.4%	3.3%
Speak English “less than very well”	0	32.2%	57.1%	45%	67%
All Other	5	46	0	56	125
% of Pop 5 & Over	.4%	1.1%		.7%	2%
Speak English “less than very well”	0	50%	0	32.1%	0

LEP Population in Columbia Transit Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 11.04	Census Tract 12.01	Census Tract 12.02	Census Tract 13	Census Tract 14
Population 5 Years and Over	9,905	5,563	5,380	3,429	10,148
Speak English “less than very well”	.7%	3.2%	4%	5.2%	5.5%
Spanish	105	39	62	52	384
% of Pop 5 & Over	1.1%	.7%	1.2%	1.5%	3.8%
Speak English “less than very well”	0	53.8%	33.9%	34.6%	72.9%

Other Indo-European	184	346	349	240	335
% of Pop 5 & Over	1.9%	6.2%	6.5%	7%	3.3%
Speak English “less than very well”	8.2%	5.5%	16.9%	25.8%	47.5%
Asian and Pacific Island	166	162	191	383	208
% of Pop 5 & Over	1.7%	2.9%	3.6%	11.2%	2%
Speak English “less than very well”	24.1%	85.8%	59.7%	25.3%	55.3%
All Other	245	180	161	0	6
% of Pop 5 & Over	2.5%	3.2%	3%		.1%
Speak English “less than very well”	7.3%	0	11.8%	0	0

LEP Population in Columbia Transit Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 15.02	Census Tract 15.03	Census Tract 15.04	Census Tract 16.01	Census Tract 16.02
Population 5 Years and Over	5,533	3,284	8,078	6,857	3,053
Speak English “less than very well”	2.3%	2.2%	6.2%	1.9%	1.3%
Spanish	73	35	76	301	88
% of Pop 5 & Over	1.3%	1.1%	.9%	4.4%	2.9%
Speak English “less than very well”	75.3%	48.6%	0	23.6%	27.3%

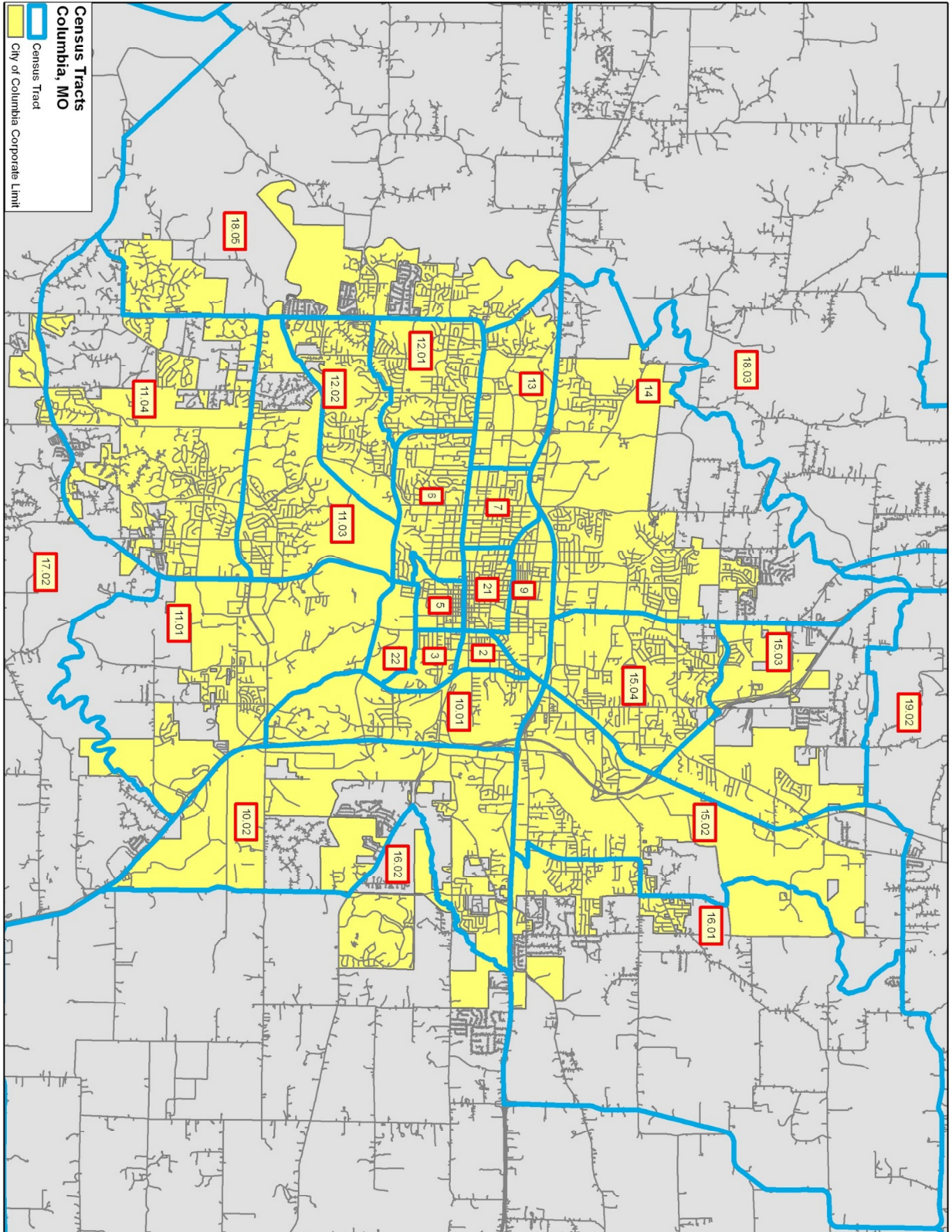
than very well”					
Other Indo-European % of Pop 5 & Over	0	4 .1%	118 1.5%	45 .7%	15 .5%
Speak English “less than very well”	0	0	28%	0	0
Asian and Pacific Island % of Pop 5 & Over	199 3.6%	43 1.3%	379 4.7%	132 1.9%	16 .5%
Speak English “less than very well”	9.5%	100%	49.1%	43.2%	100%
All Other % of Pop 5 & Over	67 1.2%	16 .5%	472 5.8%	0	0
Speak English “less than very well”	79.1%	68.8%	60.2%	0	0

LEP Population in Columbia Transit Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 17.02	Census Tract 18.05	Census Tract 21	Census Tract 22	
Population 5 Years and Over	4,249	7,795	3,227	7,157	
Speak English “less than very well”	3.2%	3.1%	3.7%	2.3%	

Spanish	91	47	88	85	
% of Pop 5 & Over	2.1%	.6%	2.7%	1.2%	
Speak English “less than very well”	69.2%	0	31.8%	9.4%	
Other Indo-European	165	342	58	178	
% of Pop 5 & Over	3.9%	4.4%	1.8%	2.5%	
Speak English “less than very well”	43.6%	7.3%	0	26.4%	
Asian and Pacific Island	8	334	92	103	
% of Pop 5 & Over	.2%	4.3%	2.9%	1.4%	
Speak English “less than very well”	0	64.7%	81.5%	61.2%	
All Other	32	0	61	67	
% of Pop 5 & Over	.8%		1.9%	.9%	
Speak English “less than very well”	0	0	24.6%	68.7%	

APPENDIX F

Columbia Transit – Map of Census Tracts





Hablamos su idioma.
我们会用您的语言与您沟通。
We speak your language.

Verbal language services are available at Wabash Station for 175 different languages.

Servicios de idiomas están disponibles en la estación de Wabash en 175 idiomas diferentes.

在我们的Wabash车站，我们有175种语言服务。



573-874-7282



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gocolumbiamo.com



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/ColumbiaTransit