

FY 2023 - 2026 Title VI Program

Adopted May XX,2023

Cape Girardeau County Transit Authority 937 Broadway, Suite 200 Cape Girardeau, Missouri 63701 Phone: (573) 335-5533 Fax: (573) 334-4872

www.cgcta.com

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A. Title VI Assurances

Cape Girardeau County Transit Authority (CGCTA) 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.

CGCTA 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. CGCTA 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.

CGCTA meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including CGCTA 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).

B. Agency Information

1. Mission of Cape Girardeau County Transit Authority

The Cape Girardeau County Transit Authority was established to provide safe, reliable, efficient and cost-effective transit services to all residents and visitors of Cape Girardeau County, Missouri. Our services are designed to assist the general public in meeting their physical, social and psychological needs, and to promote their health, security, happiness and usefulness in longer living.

2. History

After years of ineffective and uncoordinated transit service in Cape Girardeau County, the Cape Girardeau County Commission, on June 15, 2000, unanimously agreed to pass Resolution 00-06, effectively authorizing the formation of the Cape Girardeau County Transit Authority (CGCTA). The County Commission acted pursuant to Missouri Revised Statue 238.400, which states, "Any county of the first class may, by ordinance or order of the county governing body, establish a county transit authority."

The primary reason the County Commission initiated a transit system was to increase county residents' access to health care, social services, and general life needs. The Transit Authority was also established to assist in coordinating and expanding the existing transportation services and to assist with pursuing additional State and Federal funds. Prior to the formation of the Transit Authority, countywide transit had long been a problem issue for the residents of Cape Girardeau County.

In 2000, the decision was made to merge the CGCTA with the Cape County Transit, Inc. effectively creating the beginnings of a full-fledged countywide transit system. The Cape County Transit, Inc. had been providing transit services to the citizens of Cape Girardeau County for over ten years prior to the merger. Not only did the Cape Girardeau County Transit Authority gain tangible items from the Cape County Transit, Inc., such as vehicles and equipment, but it gained the credibility and respected service of its employees.

In 2006, the County Transit Authority purchased Kelley Transportation, Inc. The move effectively enabled the Transit Authority to create a seamlessly coordinated countywide transit system.

The CGCTA provides general public transportation for the citizens of Cape County. Funding streams for the CGCTA vary; however, our primary contributors are the Federal Transit Administration (FTA), the Missouri Department of Transportation (MODOT), SEMO Area Agency on Aging (AAA), the Cape Girardeau County Commission, the Cape Girardeau County Senior Citizen Service Fund, the City of Cape Girardeau, and the City of Jackson.

3. Title VI Compliance History

Prior to FY2014, CGCTA operated as a rural only transit provider and received 5311 funds as a sub-recipient of Missouri Department of Transportation Transit Division (MoDOT). In October, 2011, MoDOT advised CGCTA that a Title VI notice needed to be displayed in all vehicles and in our facility. CGCTA complied with this requirement and an example of the notice is available as Attachment 3.

Since CGCTA began operations in 2000, there have been no Title VI complaints lodged against the agency. CGCTA has never had a Title VI compliance review. CGCTA has no pending applications for financial assistance from any federal agency other than the FTA. No other federal agency has found CGCTA to be in noncompliance with any civil rights requirement.

4. Regional Profile

Cape Girardeau County has 578.54 square miles of land area. The Cape Girardeau – Jackson urbanized area is a regional center for business, health care, education, and commerce.

5. Population Served

Per the U.S. Census Bureau, the 2021 estimated population for Cape Girardeau County was 81,068 residents. The U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates establishes the population of residents over the age of 5 for Cape Girardeau County at 76,415.

6. Services & Service Area

CGCTA serves all of Cape Girardeau County. A map of the county is included in the attachments at the end of this document. Demand Response service is available county-wide, from 5 a.m. to midnight Monday through Thursday and continuously from 5 a.m. Friday to 2 p.m. Sunday, including major holidays. Within the city limits of Cape Girardeau, CGCTA operates 2 bus routes, with 2 buses operating Monday through Friday from 8 a.m. to 4 p.m., excluding major holidays. A map of the CGCTA bus routes is included at the end of this document as Attachment 4. CGCTA does not operate 50 or more fixed route transit vehicles in peak service, nor are we in a UZA with a population over 200,000. Therefore, certain elements of the Title VI program do not apply to CGCTA. These non-applicable elements have been identified throughout the body of this document.

7. Governing Body

CGCTA is governed by a Board of Directors, known as the Cape Girardeau County Transit Authority Board. The County Commission appoints five county residents to be on the Transit Authority Board.

Notice to the Public of Rights under Title VI

Cape Girardeau County Transit Authority (CGCTA) posts Title VI notices on our website, in public areas of our agency, and on our buses and/or paratransit vehicles.

CGCTA 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 CGCTA, 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 CGCTA:

- 1. You may download the CGCTA **Title VI Complaint Form** at <u>www.cgcta.com</u>, or request a copy by writing to: CGCTA, 937 Broadway, Suite 200, Cape Girardeau, MO, 63701. Information on how to file a Title VI complaint may also be obtained by calling CGCTA's Administrative Office at (573) 335-5533.
- 2. In addition to the complaint process at CGCTA, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
- 3. Complaints must be filed within one hundred eighty (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 CGCTA using the above contact information.

D. Procedure for Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of CGCTA's programs, activities, and services.

<u>RIGHT TO FILE A COMPLAINT</u>: Any person who believes they have been discriminated against on the basis of race, color, or nation origin by CGCTA 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 one hundred eighty (180) days of the alleged discriminatory complaint.

<u>HOW TO FILE A COMPLAINT</u>: 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 CGCTA **Title VI Complaint Form** at <u>www.cgcta.com</u>, or request a copy by writing to: CGCTA, 937 Broadway, Suite 200, Cape Girardeau, MO, 63701. Information on how to file a Title VI complaint may also be obtained by calling CGCTA's Administrative Office at (573) 335-5533.

You may file a signed, dated complaint no more than one hundred eighty (180) days from the date of the alleged incident. The complaint should include:

- 1. Your name, address and telephone number.
- 2. Specific, detailed information (how, why and when) about the alleged act of discrimination
- 3. 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: CGCTA Executive Director, 937 Broadway, Suite 200, Cape Girardeau, MO, 63701.

<u>COMPLAINT ACCEPTANCE</u>: CGCTA will only process complaints that are completed using the complaint form and submitted within the one hundred eighty (180) day period. Once a completed Title VI Complaint Form is received, CGCTA's Executive Director will review it to determine if CGCTA has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by CGCTA.

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

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<u>LETTER OF CLOSURE OR FINDING</u>: 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 summaries the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with the CGCTA'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. CGCTA 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, CGCTA 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 CGCTA using the above contact information.

E. Monitoring Title VI Complaints, Investigations, Lawsuits

Documenting Title VI Complaints/Investigations/Lawsuits

All Title VI complaints, investigations and/or lawsuits will be entered and tracked in CGCTA'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.

Since CGCTA began operations in 2000, there have been no Title VI complaints lodged against the agency. As of the time of publication of this document, there are no pending or on-going investigations or lawsuits that allege discrimination on the basis of Title VI rights violations.

Date complaint filed	Complaint	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Letter of Closure (CL)	Letter of Finding (LOF)	Date of CL or LOF

Agency Title VI Log of Investigations, Lawsuits and Complaints

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:

- 1. 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.
- 3. Agency transit riders and clients
- 4. Minority and low-income populations, including limited English proficient persons
- 5. Local jurisdictions and other government stakeholders
- 6. Private businesses and organizations
- 7. Employers
- 8. 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. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at local businesses, community centers and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - Email
 - Website
 - USPS Mail
 - Phone
 - In person

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

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

- 1. Public notices published in non-English publications (if available).
- 2. Title VI non-discrimination notice on agency's website.
- 3. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- 4. Services for persons with limited English proficiency (LEP). Upon advance notice, translators may be provided.

2023 – 2026 Title VI Program Public Engagement Process

CGCTA will conduct a Public Engagement Process for the 2023-2026 Title VI Program. This process includes an outreach meeting to seek input, provide education, and highlight key components of the Title VI Plan.

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

CGCTA will conduct a 30-day public comment period to provide opportunities for feedback on the 2023-2026 Title VI Program.

Comments are accepted during the public comment period via:

- 1. Email
- 2. USPS Mail
- 3. Phone
- 4. In person

G. Language Assistance Plan

CGCTA Limited English Proficiency (LEP) Plan

This limited English proficiency (LEP) Plan has been prepared to address CGCTA'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:

CGCTA serves all of Cape Girardeau County. A map of the county is included in the attachments at the end of this document.

CGCTA 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 CGCTA. 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, CGCTA undertook the **Four-Factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. <u>The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area</u>:

A significant majority of people in the CGCTA service area are proficient in the English language. Based on the U.S. Census Bureau's 2017-2021 American Community Survey 5-Year Estimates, **.93%** of the total 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	Population	Percentage of Population 5 Years and Older
Population 5 Years and Over	76,415	100%
Speak English "less than very well"	713	0.93%
Spanish	1021	1.34%
Speak English "less than very well"	165	0.22%
Other Indo-European	604	0.79%
Speak English "less than very well"	156	0.20%
Asian and Pacific Island	782	1.02%
Speak English "less than very well"	392	0.51%
All Other	200	0.26%
Speak English "less than very well"	0	<0.01%

LEP Population in CGCTA's Service Area

Based on the demographic analysis above, CGCTA has determined that no language group(s) within its service area meets Safe Harbor criteria (each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served, or likely to be affected or encountered) requiring written translation of "vital documents" by language group(s). Therefore, CGCTA is not required to provide written translations of vital documents. CGCTA will, however, provide free of charge, translation services, including oral language services, when necessary, when requested and needed (see items listed in Factor Four below).

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

CGCTA staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. Based on these interviews, to date, CGCTA has, on average, zero (0) requests per month for an interpreter.

LEP Staff Survey Form

CGCTA 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 than monthly	

3. The importance of programs, activities or services provided by CGCTA to LEP persons:

Outreach activities, summarized in CGCTA's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at businesses, 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.

Based on the analysis of frequency of contact of CGCTA personnel with LEP persons and the very small percentage of LEP individuals (0.93% for all language groups in service area combined) in our service area, it does not appear at this time that language barriers are an issue prohibiting the general public from use of transit services. The group with the largest LEP population in our service area are from the Asian and Pacific Island regions and would represent the greatest need for verbal translation services. However, the number of LEP individuals in this group represents only .51% of the overall population for the service area. Therefore, as explained above, in Factor One, CGCTA does not meet the Safe Harbor criteria that require translation of vital documents.

Outside Organization LEP Survey

Organization:

- 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 recipients and overall cost to provide LEP assistance:

- a. Language identification flashcards. "I Speak" flashcards are available in the front office of our administrative suite so that LEP individuals may indicate their need for language assistance.
- b. Internet translation. When feasible, translation may be obtained by using Google Translate at http://translate.google.com/
- c. Language line. Upon advance notice, oral translators can be provided. CGCTA will contact a translation service to provide language assistance. Translation service requests must be directed to our administrative offices.

The estimated cost for these assistance efforts is expected to be minimal, ranging from \$0 - \$500 annually.

CGCTA's website provides notice that oral language assistance is available via request at our administrative offices, free of charge.

A public notice is posted in our offices and facilities in English and Spanish, advising LEP individuals that oral language assistance is available, free of charge.

Staff LEP Training

All current CGCTA staff, including drivers, dispatchers and administrative personnel have been provided a copy of CGCTA's Title VI Program. This document includes information on CGCTA's Title VI Procedures and LEP responsibilities. Any person employed by CGCTA will receive a copy of CGCTA's Title VI Program as part of the employee handbook they receive during orientation. An annual refresher update on Title VI and LEP services will be included in employee training meetings.

Drivers and dispatchers will be instructed to direct LEP individuals in need of translation services to the administrative office.

Administrative personnel have been or will be trained on the use of LEP flashcards. Additionally, they will be provided with instructions on how to use the Google Translate website.

All employees will be asked to report requests for language assistance to the LEP coordinator in the administrative office.

Monitoring and Updating the LEP Plan

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

CGCTA will update the LEP plan every three years. If it becomes clear that higher concentrations of LEP individuals are present in the CGCTA service area, the plan will be reviewed and updated prior to the triennial anniversary. The plan review will include the following:

- 1. How have the needs of LEP persons been addressed to date?
- 2. Determination of the current LEP population in the service area.
- 3. Determination as to whether the need for, and/or extent of, translation services has changed.
- 4. Determination of whether current language assistance programs have been effective and sufficient to meet the needs.
- 5. Determination of whether CGCTA's financial resources are sufficient to fund language assistance resources as needed.
- 6. Determination of whether CGCTA has fully complied with the goals of this LEP Plan.
- 7. Determination of whether complaints have been received concerning CGCTA's failure to meet the needs of LEP individuals.

H. Advisory Bodies

CGCTA is governed by a Board of Directors consisting of 5 volunteer citizens from the community. CGCTA does not make the appointments to the Board when a position becomes vacant. The members of the Board are appointed by the County Commission. Therefore, the requirement to report minority representation on planning and advisory bodies does not apply to CGCTA because we do not have direct influence over the selection of Board members.

I. Subrecipient Assistance

Southeast Missouri State Transit Services (SMSTS) is a subrecipient of CGCTA. CGCTA has worked in conjunction with SMSTS to develop their Title VI Program including a Language Assistance Plan. SMSTS's Title VI plan includes complaint procedures, complaint forms and tracking forms for filed complaints. CGCTA will review SMSTS's Title VI program and provide assistance as needed.

J. Subrecipient Monitoring

As a subrecipient of CGCTA, SMSTS is required to provide CGCTA with an updated Title VI Program every three years. SMSTS's Title VI Program will be reviewed to determine compliance with requirements set forth in FTA Circular 4702.1B and will be kept on file at CGCTA administrative offices. SMSTS must provide a Board of Directors' resolution or letter from their administration stating the Title VI Program (including the LEP plan) have been approved and adopted by the university.

CGCTA will perform periodic onsite inspections of SMSTS's facilities and vehicles to ensure that appropriate Title VI and LEP signage is displayed. SMSTS's website will be reviewed to ensure that their Title VI Program and appropriate complaint forms are made available to the public.

CGCTA will require SMSTS to sign a Memorandum of Understanding (MOU) stating SMSTS will notify CGCTA within 2 business days of any complaints, investigations or lawsuits that are filed alleging transit operations violations of Title VI. CGCTA will perform periodic reviews of the Title VI complaint logs of the subrecipient.

K. Equity Analysis of Facilities

CGCTA has not constructed any storage, maintenance facilities, or operations centers in the last three years and has no current plans to do so.

L. Service Standards and Policies

Vehicle Load

CGCTA's bus revenue fleet consists of one (1) type of vehicle, 22' transit bus with a seating capacity of 11 sitting and 2 wheel chairs with no capacity for standing. It is CGCTA's policy that the vehicle load will not exceed 100% of seated capacity on a consistent basis.

CGCTA monitors the "Vehicle Load" in two ways. The Operations Manager reviews the daily tally sheets from the drivers and weekly reviews with the drivers for any issues pertaining to passenger loads.

Vehicle Headway

CGCTA operates two buses, one on the South side and one on the North. A one-hour headway for both of the service routes has shown to be the most effective.

On-time performance

CGCTA service operators do not leave timed stops early and arrive at destination at published times, within 10 minutes, to be considered on-time. CGCTA service standard is 90% on-time performance. The Operations Manager monitors this performance based upon feedback from the customers and monthly spot checks at designated service stops.

Service availability

CGCTA has regular scheduled fixed route transit service available within the city limits of Cape Girardeau City. CGCTA has determined that the transit system covers approximately 75% of the Cape Girardeau City proper.

Transit Amenities

CGCTA currently has 3 permanent shelters. These shelters are all located on private property. Any future shelters that are placed on private property would be located based on the following factors:

- 1. Availability of a private property location
- 2. Ridership concentration

CGCTA does not have decision-making authority over the siting of transit amenities on public lands within the City of Cape Girardeau.

Vehicle Assignment

All vehicles used for the fixed bus route are 22' Ford cut-aways and are either 2017 or 2021 model buses. Buses are assigned to the designated route by the Operations Manager based on mileage and ridership concentration.

M. Requirement to Collect and Report Demographic Data

CGCTA is not required to collect and report demographic data because we do not operate 50 or more fixed route transit vehicles in peak service, nor are we in a UZA with a population over 200,000.

N. Requirement to Monitor Transit Service

CGCTA is not required to collect and report demographic data or travel patterns because we do not operate 50 or more fixed route transit vehicles in peak service, nor are we in a UZA with a population over 200,000.

O. Service and Fare Equity Analysis

This requirement does not apply to CGCTA because we do not operate 50 or more fixed route transit vehicles in peak service, nor are we in a UZA with a population over 200,000.

Attachment 1 CGCTA Service Area Map



Attachment 2 Cape Girardeau County Transit Authority Title VI Complaint Form

"No person in the United States shall, on the ground 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."

This form is to be used to file a complaint with CGCTA based on purported violations of Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act of 1990. 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. If you need assistance completing this form, please contact us by phone at (573) 335-5533, or fax (573) 334-4872.

Please mail or return this form to: Tom Mogelnicki, Executive Director Cape Girardeau County Transit Authority 937 Broadway, Suite 200 Cape Girardeau, MO 63701 Fax: (573) 335-5533 Email: <u>tmogelnicki@cgcta.com</u>

Only the complainant or the complainant's representative must complete this form.

1. Complainant's Name:	
a. Address:	
b. City: State: Zip Code:	
c. Telephone (Home 🛛 or Cell 🗅) Please include area code 🛛 Telephone Number (Work)	
d. E-Mail:	
Do you prefer to be contacted via this e-mail address? Yes No	
2. Accessible Format of Form Needed? Large Print Audio Tape TDD	
Other (please specify):	
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 (Home 🗆 or Cell 🗆) Please include area code 🛛 Telephone Number (Work)	
()	
e. E-Mail:	
Do you prefer to be contacted via this e-mail address? 🛛 Yes 🛛 No	

E			
5. Wh	nat is your relationship to	the person for whom you are fili	ng the complaint?
6. Ple	ease confirm that you ha	ave obtained permission of the	e aggrieved party if you are filing on
beł	half of a third party. \Box	Yes, I have permission.	☐ No, I do not have permission.
7. I bel	lieve that the discrimina	ation I experienced was based	On (check all that apply)
	Race 🗌 Color	🗆 National Origin (Classes p	rotected by Title VI)
	Other (please specify)		
8. Dat	te of the Alleged Discrin	mination (Month, Day, Year):	
9. Wh	nere did the Alleged Dis	scrimination take place?	
aga infe	ainst. Describe all of the	e persons that were involved.	you believe that you were discriminated Include the name and Contact u (if known). Use the back of this form or separate
	ease list any and all with or separate pages if additional space		bers/contact information. Use the back of
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complaint.

Signature and date are required:

Signature

Date

If you completed Questions 4, 5 and 6, your signature and date is required:

Attachment 3 Cape Girardeau County Transit Authority Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Cape Girardeau County Transit Authority

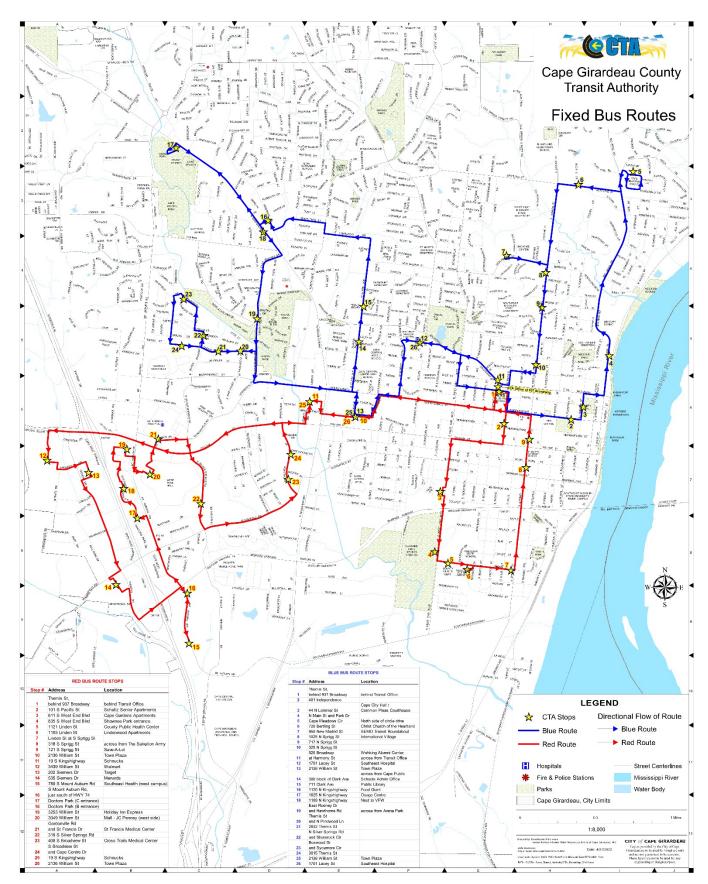
Cape Girardeau County Transit Authority operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Cape Girardeau County Transit Authority.

For more information on the Cape Girardeau County Transit Authority civil rights program, and the procedures to file a complaint, contact 573-335-5533; email <u>info@cgcta.com</u>; or visit our administrative office at 937 Broadway St., Suite 200, Cape Girardeau, MO 63701. For more information, visit <u>www.cgcta.com</u>.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact 573-335-5533.

Attachment 4



Attachment 5

INSERT AUTHORIZING RESOLUTION HERE

