

# **Southwest Center for Independent Living (SCIL)**

## **Title VI Program**

March 23, 2014

**Title VI Plan  
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**Attachments**

Attachment 1 –Title VI Complaint Form

## A. Title VI Assurances

SCIL 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.

SCIL 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. SCIL 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.

SCIL meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including SCIL 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 Southwest Center for Independent Living (SCIL)**

It is the mission of SCIL to promote a barrier-free environment for all individuals with disabilities, through public education and advocacy for social change, and to provide a full range of independent living services which will assist each in meeting his or her individual potential for independence. This mission is achieved through the following:

1. Promotion, sponsorship and implementation of programs for the continuing education of the public concerning the rights and needs of persons with disabilities, hereinafter referred to as consumers.
2. Assessment of the needs of disabled persons living in the service area.
3. Provision of advocacy, consultation, and coordination of services to meet the needs of consumers.
4. Promotion of increased employment opportunities and development of job readiness skills for consumers.
5. Assistance to consumers in awareness and pursuit of their rights as guaranteed by federal, state, municipal legislation, and assistance to the community in moving toward full compliance with that legislation.
6. Advocacy for removal of architectural and attitudinal barriers.
7. Provision of peer consultation, information referrals, independent living skills training and advocacy to consumers which would enable them to live with maximum independence and dignity, and in such a way as to promote the philosophy of self-help, self-determination and self-advocacy.

Consumer means any individual with a significant disability who is eligible for independent living (IL) services under 34 CFR 364.40(a) and is currently receiving or has been provided with any IL service(s) under the program.

### **2. History (including year started)**

Founded in 1985, SCIL opened February 2, 1986 from the work of a grassroots group of citizens to protect the civil rights of people with disabilities. As a Center for Independent Living (CIL), SCIL follows the philosophy of consumer control with a majority of staff & governing board with disabilities. There are over 400 CIL's across the UNITED States & 22 in the state of Missouri.

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

The SCIL main office in Springfield & Branson branch serve a population base of 552,833 people.

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

SCIL serves all persons with disabilities regardless of gender, age, race, & income or disability type. SCIL offers services in these southwest Missouri counties: Christian, Dallas, Greene, Lawrence, Polk, Stone, Taney & Webster

Of the 552,833 people served in the SCIL service area, an estimated 14.7% or approximately 81,000 people live with at least one disability. (US Census 2009-11 American Community Survey Estimates.)

The Americans with Disabilities Act (ADA), defines a disability as a physical or mental impairment that substantially limits one or more major life activities. A disability can be physical, mental, emotional, cognitive or sensory as well as permanent or temporary.

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

The Southwest Center for Independent Living (SCIL) offers choices and empowerment for individuals with disabilities in the Missouri counties of Christian, Dallas, Greene, Lawrence, Polk, Stone, Taney and Webster.

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

#### **Board of Directors**

**Section I.** There shall be a Board of Directors numbering not fewer than ten (10) nor more than twenty-five (25) members. This Board shall be governing and working in nature. In keeping with the philosophy of Centers for Independent Living, a minimum of 51% of Board Members must have a disability. The Board of Directors shall conduct business according to Robert's Rules of Order. A regular meeting of the Board of Directors shall be scheduled for a total of six (6) regular meetings per year. The CEO of SCIL shall serve as ex-officio on the Board of Directors. Board members may participate at board meetings or committee meeting by phone, in person or as a reasonable accommodation and supplement to a physical meeting through other electronic communication means. Such means could be but not limited to: speaker phone, Voice Over Internet Protocol (VOIP) telephone or video conferencing or real time captioning.

#### **Section II.** Board Member Qualifications

All candidates for the Board of Directors shall comply with the following qualifications:

1. Be in agreement with the independent living philosophy as states in the by-laws.
2. Be a member, in good standing, of SCIL with current yearly dues paid.

3. Have an interest in the functions of SCIL and possess a specific area of expertise relevant to the needs of SCIL.
4. Be in agreement to attend at least 50% of the scheduled board meetings and to serve on at least one board committee. No person shall be discriminated against for board membership based on race, creed, color, religion, national origin, sexual orientation, gender, age or disability.
5. Potential new Board members will attend two board meetings prior to being placed on the ballot in order to understand how the board functions. If the potential new Board member has served on the Board before, this qualification will not be required.
6. All Board members are required to successfully pass the Family Care Safety Registry screening and Employee Disqualification List check. Screenings will be conducted on prospective Board members and must be passed prior to recommendation to the Board.

**Section III.**                    Term of Office

The term of office for Board Members shall be two (2) years, commencing from October 1 of the year of their election, to September 30 two years hence. No Board member shall serve more than three (3) consecutive terms, except the immediate past President may serve on the Executive Committee for one additional year for continuity and advisory purposes, but may not vote. Vacancies on the Board during the year may be filled by a majority vote of the Board present at that meeting.

**Section IV.**                    Vacancies / removal or resignation of Board Member

A Board member that has 3 consecutive, unexcused absences, may be replaced on the Board of Directors by a 2/3 vote of the Board members present at the next meeting. Notification before scheduled meeting, qualifies as an excused absence. A Board member may also be replaced for unethical conduct, unbecoming to a Board member or conduct that is disruptive to the functioning of the Board. This will be done after the Executive Committee has given the said Board member a hearing, upon a written complaint signed by two current Board members and submitted to the Executive Committee. The Executive Committee will review the complaint, conduct a hearing with the named Board member, and if the committee believes the misconduct is sufficient to warrant removal of the member, then a written decision of the Executive Committee, with a summary of the facts submitted in the hearing will be provided to the full board for their review. After consideration of the facts, the Board of Directors may then dismiss the said Board member by a 2/3 vote of the Board members present at the next Board meeting.

Vacancies occurring on the Board for any reason except the removal a Board member without cause, may be filled by a vote of a majority of the Board in attendance, although less than a quorum exists. Vacancies occurring by reason of the removal of a Board member with cause, shall be filled by a simple majority vote of the Board members present.

A Board member elected to fill a vacancy caused by resignation, death, or removal shall be elected to hold office until the next scheduled election of Board members by the membership.

Removal of Board Members:

A Board member may resign at any time by giving written notice to the Board of Directors, the president or the secretary of the Board. Unless otherwise specified in the notice, the resignation shall take effect upon receipt thereof by the Board of Directors or such officer, and the acceptance of the resignation shall not be necessary to make it effective.

**Section V.**                    Nominating Committees

The nominating committee shall consist of three to five (3 to 5) persons, two of whom are current members of the Board. A 51% majority of this committee shall have disabilities. This committee shall be appointed by the President at the start of the fiscal year, and shall serve a term of two years, half of the committee changing each year.

**Section VI.**                    Quorum

Twenty-five percent (25%) of the Board of Directors shall constitute a quorum for the transaction of business at any meeting of the Board.

## C. Notice to the Public

### **Notifying the Public of Rights under Title VI**

Southwest Center for Independent Living (SCIL) posts Title VI notices on our agency's website, in public areas of our agency, and on our buses and/or paratransit vehicles.

SCIL 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 SCIL, 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 Southwest Center for Independent Living:**

1. To obtain a Complaint Form please contact SCIL at 417-886-1188 or on our website at [www.swcil.org](http://www.swcil.org).
2. In addition to the complaint process at SCIL, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region VII, 1-800-368-1019.
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 417-886-1188.



## **D. Procedure for Filing a Title VI Complaint**

### **Filing a Title VI Complaint**

The complaint procedures apply to the beneficiaries of SCIL'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 SCIL 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 SCIL Title VI Complaint Form at [www.swcil.org](http://www.swcil.org), or request a copy by writing to 2864 S. Nettleton Ave, Springfield, MO 65807. Information on how to file a Title VI complaint may also be obtained by calling SCIL at 417-886-1188 or 1-800-676-7245.

You may file a signed, dated complaint no more that 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 Cari Wright, Program Manager., 2864 S. Nettleton Ave., Springfield, MO 65807.

COMPLAINT ACCEPTANCE: SCIL will process complaints that are complete.

Once a completed Title VI Complaint Form is received, SCIL will review it to determine if SCIL has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by SCIL

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

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with SCIL'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. SCIL 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, SCIL 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 Cari Wright, Program Manager at 2864 S. Nettleton Ave., Springfield, MO 65807, or at 417-886-1188 or 1-800-676-7245.

**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 SCIL’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.

**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

No Complaints have been filed at this time regarding SCIL.

**Documenting Evidence of Agency Staff Title VI Training**

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

## F. Public Engagement Plan

### Goal

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

#### Objectives

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

### Identification of Stakeholders

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

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

## **Elements of the Public Engagement Plan**

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

Elements of the Public Engagement Plan include:

### **1. Public Notice**

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

### **2. Public Engagement Process/Outreach Efforts:**

- a. Public meetings
- b. Open houses
- c. 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 schools, churches, libraries 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:
  - i. Dedicated email address.
  - ii. Website.
  - iii. Regular mail.
  - iv. Forms using survey tool for compilation.
  - v. Videotaping.
  - vi. Phone calls to Customer Service Center [phone]

### **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**

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

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

### **2013 – 2016 Title VI Program Public Engagement Process**

SCIL 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.

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

SCIL will conduct a 30 day public comment period to provide opportunities for feedback on the 2013-2016 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey Tool

### **Summary of 2010-2012 Public Outreach Efforts**

As a Center for Independent Living we are required to provide Outreach to unserved and underserved populations. In doing so, staff attends community meetings within our eight county service area and any opportunity that arises allowing for staff to sit on committees or boards for such organizations and/or agencies.

In providing outreach to our communities we are in contact with School Counselors, Public Health Offices, English as Second Language Classes, area churches, MO Extension Offices, Catholic Outreach Ministries, area Diversity Networking Groups, United Migrant Workers

(UMOS), area Hand in Hand Ministries organization and our Annual Multicultural Fair held in our community on Martin Luther King, Jr. Day. In 2013 we logged nearly 400 hours in time spent providing outreach to our community to reach underserved and unserved populations.

In addition, SCIL conducts a Community Needs Assessment each year to gauge community needs and gaps in service via community input. We distribute the survey via a web link and in print format.

## G. Language Assistance Plan

### Southwest Center for Independent Living's(SCIL) Limited English Proficiency Plan

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

The Southwest Center for Independent Living (SCIL) offers choices and empowerment for individuals with disabilities in the Missouri counties of Christian, Dallas, Greene, Lawrence, Polk, Stone, Taney and Webster.

SCIL 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 SCIL. 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, SCIL 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:

According to the OTO LEP Plan, additional languages for OTO to be aware of, as certain populations grow, include German, French (including Patois and Cajun), Chinese, and Russian.



After English and Spanish, these are among the top languages that are spoken at home for the population 5 years and over, regardless of the ability to speak English.

The OTO developed a survey with questions for agencies that provided services to Local LEP persons and to determine what services are most critical to the local LEP population. The OTO mailed 40 invitation letters to local educational organizations, public agencies, and churches asking for each group to participate in the 16 question LEP survey. Surveys were collected from February 15 through March 8, 2013. The survey responses included two organizations requesting removal from future mailings, and seven completed surveys. Two organizational addresses were no longer valid and are indicated in Appendix B.

Survey respondents stated that they work with LEP persons that speak languages that include Chinese, French, Korean, Japanese, Portuguese, Romanian, Russian, Spanish, Thai, and most other languages. There was a wide range in the ability to speak English from beginner to proficient. The 2010 census data for the OTO area indicates an increased population growth in most groups. The presence of individuals 5+ year of age, speaking English less than very well in Springfield area has grown to 3,094 and the OTO area to 4,493 per Table 1 data. The two languages with the largest increase have been Chinese and German as shown in Appendix A, but still under the Safe Harbor threshold.

A significant majority of people in the SCIL service area are proficient in the English language. Based on 2010 Census data, 1.8% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

<b>LEP Population in SCIL Service Area</b>					
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Christian County within OTO Study Area</b>	<b>Greene County within OTO Study Area</b>	<b>Lawrence County</b>	<b>Dallas County</b>	<b>Polk County</b>
<b>Population 5 Years and Over</b>	67,594	256,180	35,942	15,716	29,077
Speak English “less than very well”	615	3,878	1,086	493	435
<b>Spanish</b>					
Speak English “less than very well”	488	1,797	172	79	97
<b>Other Indo-European</b>					
Speak English “less than very well”	86	581	914	414	227
<b>Percentages</b>					
Percentage of Non-English Indo-European	.13%	.23%	.48%	2.6%	.78%
Percentage of	.72%	.70%	2.5%	.50%	.33%

Spanish speaking persons					
Percentage of All persons 5+ years of age who speak English less than "Very Well"	.91%	1.51%	3.0%	3.1%	1.4%
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Webster County</b>	<b>Stone County</b>	<b>Taney County</b>		
<b>Population 5 Years and Over</b>	33,578	30,563	48,544		
Speak English "less than very well"	1,207	107	1,529		
<b>Spanish</b>					
Speak English "less than very well"	142	102	760		
<b>Other Indo-European</b>					
Speak English "less than very well"	1,065	5	753		
<b>Percentages</b>					
Percentage of Non-English Indo-European	3.1%	.02%	1.6%		
Percentage of Spanish speaking persons	.42%	.33%	1.6%		
Percentage of All persons 5+ years of age who speak English less than "Very Well"	3.6%	.35%	3.1%		

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

The SCIL staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, SCIL has, on average, no requests per month for an interpreter regarding transportation.

LEP Staff Survey Form

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

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?  
DAILY WEEKLY MONTHLY LESS THAN MONTHLY
2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

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

Outreach activities, summarized in SCIL's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

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 SCIL and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.



5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

*As applicable:* Based on our demographic analysis (Factor 1) SCIL has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

SCIL will provide assistance and direction to LEP persons who request assistance.

### **Staff LEP Training**

The following training will be provided to SCIL staff:

1. Information on SCIL’s Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

### **Monitoring and Updating the LEP Plan**

The LEP Plan is a component of SCIL’s Title VI Plan requirement.

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

## H. Advisory Bodies

**Table Depicting Membership of Committees, Councils, By Race**

<b>Committee [examples]</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>		<b>Total</b>
Board of Directors	13					100%

**Description of efforts made to encourage minority participation on committees:**

- **Our Board of Directors is comprised of a minimum of 51% of people with disabilities**
- **Providing information to individuals about applying to be on the SCIL Board.  
Solicitation within groups and organizations serving minorities**

## **I. Subrecipient Assistance**

### **Subrecipient Assistance**

SCIL does not have any subrecipients.

## **J. Subrecipient Monitoring**

### **Subrecipient Monitoring**

SCIL does not have any subrecipients.

## **K. Equity Analysis of Facilities**

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

Attachment 1

**SOUTHWEST CENTER FOR INDEPENDENT LIVING  
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:

Cari Wright  
SW Ctr for Independent Living  
2864 S. Nettleton Ave; Springfield, MO 65807  
417-886-1188 or [cwright@swcil.org](mailto:cwright@swcil.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) ( ) Other (please specify)

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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