

ORDINANCE NO. 4070

AN ORDINANCE OF THE CITY COUNCIL OF CLINTON, MISSOURI ADOPTING THE TITLE VI EXTERNAL CIVIL RIGHTS POLICY AND LIMITED ENGLISH PROFICIENCY PLAN FOR THE CLINTON AREA TRANSPORTATION SERVICE.

WHEREAS, the City of Clinton is required to have a Title VI External Civil Rights Policy and Limited English Proficiency Plan to receive federal transit funding; and

WHEREAS, the City of Clinton held a 30-day public comment period for the policy and plan, ending June 3, 2018; and

WHEREAS, no verbal or written comments were received during the 30-day period;

NOW, THEREFORE, BE IT HEREBY ORDAINED BY THE CITY COUNCIL OF CLINTON, MISSOURI AS FOLLOWS:

- Section 1.** The attached Title VI External Civil Rights Policy and Limited English Proficiency Plan is hereby approved and adopted.
- Section 2.** This ordinance shall be effective immediately upon its passage and approval as provided by law.
- Section 4.** Any ordinance or parts of ordinances in conflict herewith are hereby repealed in their entirety.

Read the first time this 7th day of September, 2021.

Read a second time and passed this 21st day of September, 2021.



Greg Lowe, Presiding Officer

ATTEST:

Ayes - 7 Gene Henry, Roger House, Cameron Jackson, Carla Moberly, Rick Pereles, Becky Raysik, Daniel Wilson
Nays - 0
Absent - 1 Debbie Smith



Wende Seaton, City Clerk





Greg Lowe, Mayor

CITY OF CLINTON
AREA TRANSPORTATION SERVICE

TITLE VI

EXTERNAL CIVIL
RIGHTS
POLICY

&

LIMITED ENGLISH
PROFICIENCY PLAN

2022-2025

**Title VI Plan
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A. Title VI Assurances

The City of Clinton Area Transportation Service (herein after known as ATS), 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.

ATS 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. ATS 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.

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

Additional information regarding ATS's nondiscrimination obligations may be obtained by the following methods:

In person

By phone (660-885-6121)

Email by going to the City website at www.clintonmo.com

Mail service at City of Clinton, 105 E. Ohio St., Clinton, MO. 64735.

B. Agency Information

1. **Mission:** ATS strives to provide safe/affordable transportation within our community for those persons requiring transportation needs. Thus allowing them to maintain a more normal way of life through their employment, shopping needs, or just human interaction.
2. **History:** ATS was first started as a not for profit organization in December 1973. It was incorporated and operated by a board of directors that not only had a vision, but knew there was a need for affordable transportation. The City of Clinton would oversee the day to day operations with the City of Clinton subsidizing 50% of the operational costs and a transportation tax for the match part of new bus purchases.
In March of 1996 the board decided that since the City was operating the system anyway, the City might as well take over the operations fully and thus the board was disbanded. The City agreed and has been operating the system since 1996 with only a one time rate increase from \$.75 per ride to \$1.00 in which was approved by the original board in 1990.
3. **Profile:** ATS serves within the City of Clinton city limits only. We are comprised of approximately (11) square miles with a population of 9,118.
4. **Population served:** ATS serves within the city limits of Clinton only. The population is approximately 9,118. ATS provides approximately 24,000 one way trips per year. Our service provides rides for anyone requesting a ride or our services.
5. **Service area:** Service area is limited to within Clinton city limits. We utilize all streets within our city depending on the rider location as we are demand response with no fixed routes. Refer to attachment # 1 for map of service area.
6. **Governing body:** The City of Clinton is the governing body over the ATS. Clinton is a third class city organized and incorporated under the laws of the State of Missouri in 1836. The City has an elected Mayor and City Council and operates under the City Administrator plan. The City Administrator is appointed by the Mayor and City Council. The City Council is made up of: Mayor (1) Caucasian male, with Council members being made up of (5) Caucasian males and (3) Caucasian females serving terms of (2) years each.

Note 1: Whereas the ATS does not have a planning/advisory board element for our Title VI plan, the racial composition element is not applicable.

Note 2: Whereas the ATS does not have any subrecipients, monitoring of said subrecipients is not required.

C. Notice to the Public

Notifying the Public of Rights under Title VI

ATS posts Title VI notices on our agency's website at <http://www.clintonmo.com/area-transportation-service>, inside City Hall, and on our buses and/or paratransit vehicles.

ATS operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

For more information on ATS's Title VI program, and the procedures to file a complaint, contact the ATS project manager at (660) 885-6121; cbailey@cityofclintonmo.com; or visit our administrative office at 105 E Ohio St, Clinton, MO 64735. For more information visit <http://www.clintonmo.com/area-transportation-service>.

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

1. You may file a claim by obtaining a claim form at 105 E Ohio St, Clinton, MO 64735 or online at <http://www.clintonmo.com/area-transportation-service>.
2. In addition to the complaint process at ATS, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street, Suite 404, Kansas City, Missouri 64106.
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 660-885-6121.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of ATS'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 ATS 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 ATS's Title VI Complaint Form at <http://www.clintonmo.com/area-transportation-service>, or request a copy by writing to 105 E Ohio St, Clinton, MO, 64735. Information on how to file a Title VI complaint may also be obtained by calling the ATS Project Manager at 660-885-6121.

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 105 E Ohio St, Clinton, MO 64735.

COMPLAINT ACCEPTANCE: The ATS Project Manager, also known as the Community Development Director, will process complaints that are complete. Once a completed Title VI Complaint Form is received, the Project Manager will review it to determine if ATS has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by ATS.

INVESTIGATIONS: ATS will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, ATS may contact the complainant. Unless a longer period is specified by ATS, the complainant will have ten (10) days from the date of the letter to send requested information to the ATS 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 ATS's determination, the complainant may request reconsideration by submitting the request in writing to the ATS Project Manager within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. ATS 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, ATS 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 the ATS Project Manager at 105 E Ohio St, Clinton, MO 64735, or at 660-885-6121.

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

See sample
Title VI
Self-Survey Form
ATTACHMENT 3

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in ATS'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

Documenting Evidence of Agency Staff Title VI Training

ATS'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. Notification shall be provided by periodic publication, public posting, providing notice to other agencies and entities that serve ATS's patrons, and provision of flyers in service vehicles.
- 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. Contact information will be provided by periodic publication, public posting, providing notice to other agencies and entities that serve ATS's patrons, and provision of flyers in service vehicles.
- To convey the information in various formats to reach all key stakeholder groups, such as public posting, periodic publication, distribution to other agencies and entities that serve ATS's patrons, and flyers in service vehicles.

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:

- City Council – the governing board of the agency. The role of the City Council is to establish policy and legislative direction for the agency. The City Council defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies may review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies may 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 City 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 at 660-885-6121.

4. Response to Public Input

All public comments are provided to the City Council prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

ATS ensures all outreach strategies, communications and public involvement efforts comply with Title VI. ATS'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, ATS 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. Translators may be sourced from locally identified proficient translators, translation resources from the University of Central Missouri, and/or the Circuit Court's state approved translator list.

2022-2025 Title VI Program Public Engagement Process

ATS will conduct a Public Engagement Process for the 2022-2025 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Meetings will be held at City Hall, 105 E Ohio St, Clinton, MO. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations. ATS plans to distribute these materials to local churches, charitable groups, schools, and other agencies who are likely to have contact with and provide support services to non-english speaking populations.

ATS will provide briefings to the City Council and Advisory Bodies, and will conduct a 30 day public comment period to provide opportunities for feedback on the 2022-2025 Title VI Program.

Comments are accepted during the public outreach period via:

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

Summary of 2018-2021 Public Outreach Efforts

Meetings were held regularly on the 1 st and 3 rd Tuesdays of each month during the period Listed above at City Hall, 105 E. Ohio St, Clinton, MO. No public comments were received.

G. Language Assistance Plan

ATS Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address ATS '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.

<u>Service Area Description:</u> The service area is limited to areas within the corporate city limits of Clinton, Missouri.
--

ATS 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 ATS. 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, ATS undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

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

A significant majority of people in the ATS service area are proficient in the English language. Based on 2019 Census data, 1.5% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency.

LEP Population in the City of Clinton, Missouri					
Population 5 years and over by language spoken at home and ability to speak English	City of Clinton	None	None	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over	8,587			8,587	100.00%
Speak English only	8,149	0	0	8,149	94.90%
Spanish	314			314	3.66%
Speak English “less than very well”	95			95	1.11%
French, Haitian, or Cajun	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
German	16			16	0.19%
Speak English “less than very well”	9			9	0.10%
Russian	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
Indo-European	63			63	0.73%
Speak English “less than very well”	28			28	0.33%
Korean	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
Chinese	28			28	0.33%
Speak English “less than very well”	0			0	0.00%
Vietnamese	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
Tagalog	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
Asian & Pacific Island	0			0	0.00%
Speak English “less than very well”	0			0	0.00%
Arabic	17			17	0.20%
Speak English “less than very well”	0			0	0.00%
All Other	0			0	0.00%

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

The ATS staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, ATS has, on average, zero requests per month for an interpreter. ATS averages 500 calls for service per month.

LEP Staff Survey Form

ATS 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 ATS to LEP persons:

Outreach activities, summarized in ATS'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 ATS 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 City Council meetings and on the customer service phone lines.

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

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

Staff LEP Training

The following training will be provided to ATS staff:

1. Information on ATS 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 ATS’s Title VI Plan requirement.

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

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American		Total
City Council	100%	0%	0%	0%		100%

Description of efforts made to encourage minority participation on committees:

- Public notices declaring elections and announcing filing requirements are published in the local newspaper and posted at City Hall.

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

ATS does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

ATS does not have any subrecipients.

K. Equity Analysis of Facilities

OPTION A

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

L. System-Wide Service Standards and Policies*

**applies to all fixed route providers (including those that do not meet volume threshold)*

NOT APPLICABLE

M. Requirement to Collect and Report Demographic Data*

**applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.*

NOT APPLICABLE

N. Requirement to Monitor Transit Service*

**applies to providers that operate 50 or more fixed route transit vehicles in peak service; and
200,000+ population.*

NOT APPLICABLE

O. Service and Fare Equity Analysis* (NOT APPLICABLE)

**applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.*

Major Service Change and Impact Policies

The Board of Directors of _____ has established formal hearing procedures for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within _____'s transit system, **increasing or decreasing the number of service hours operated on a route by 25% or more, or routing changes that alter 25% or more of a route's path.** Minor changes to an existing route shall not constitute a "major change in route".

A service change that is deemed a "Major Service Change" based on the description above would require a Title VI analysis.

Service changes that are deemed as a "Major Service Change" will also be required to have disparate impact analysis and disproportionate burden analysis done.

The _____ Title VI Program includes disparate impact and disproportionate burden policies.

_____ 's Disparate Impact and Disproportionate Burden Policy

Adverse Effects: Major Service Change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined by demographic analysis of proposed changes and U.S. Census data and transit rider data.

What is Fair?: [EXAMPLE] Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths" rule. This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is [20%]. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact on minority populations: If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

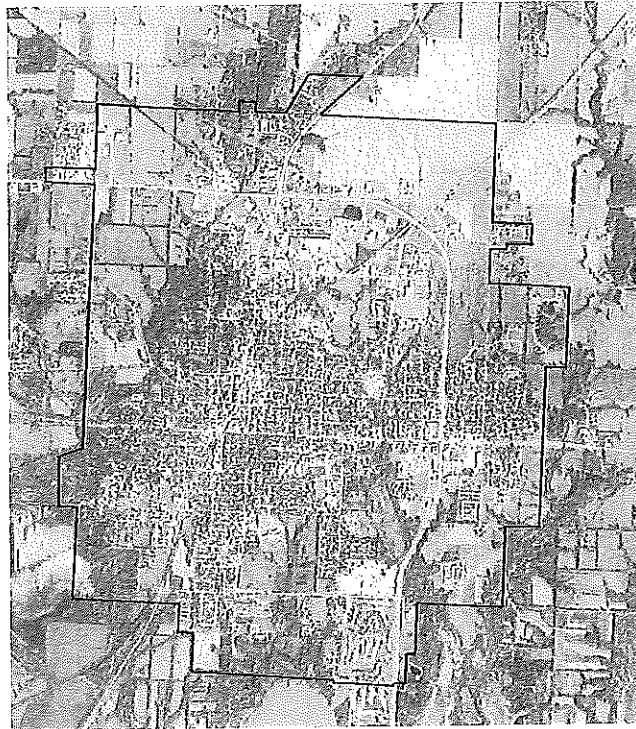
Disproportionate burden on low income populations: If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

Attachment 1

Agency Information

ATS was first started as a not for profit organization in December 1973. It was incorporated and operated by a board of directors that not only had a vision, but knew there was a need for affordable transportation. The City of Clinton would oversee the day to day operations with the City of Clinton subsidizing 50% of the operational costs and a transportation tax for the match part of new bus purchases.

In March of 1996 the board decided that since the City was operating the system anyway, the City might as well take over the operations fully and thus the board was disbanded. The City agreed and has been operating the system since 1996 with only a one time rate increase from \$.75 per ride to \$1.00 in which was approved by the original board in 1990. ATS serves within the city limits of Clinton only. The population is approximately 9,118. ATS provides approximately 24,000 one way trips per year. Our service provides rides for anyone requesting a ride or our services.



The City of Clinton is the governing body over the ATS. Clinton is a third class city organized and incorporated under the laws of the State of Missouri in 1836. The City has an elected Mayor and City Council and operates under the City Administrator plan. The City Administrator is appointed by the Mayor and City Council. The City Council is made up of: Mayor (1) Caucasian male, with Council members being made up of (5) Caucasian males and (3) Caucasian females serving terms of (2) years each.

Attachment 2

ATS 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:

Project Manager
 Area Transportation Service
 105 E Ohio St, Clinton, MO 64735
cbailey@cityofclintonmo.com 660-885-2023 FAX

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)		

continued

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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