

## Title VI Program Assessment

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| <b>Agency Name:</b>           | City of Bellefontaine Neighbors                                      |
| <b>Address:</b>               | 9641 Bellefontaine Road, Bellefontaine Neighbors, MO 63137           |
| <b>Contact:</b>               | James Kirincich  |
| <b>Phone:</b>                 | 314.867.0700   |
| <b>Email:</b>                 | <a href="mailto:jkirincich@cityofbn.com">jkirincich@cityofbn.com</a> |
| <b>Subrecipient category:</b> | On-Demand  |
| <b>Plan Expiration Date:</b>  | 9/15/2025  |

| Title VI/EJ Requirement  | Findings | Deficiency    | Corrective Action/Comment | Due Date |
|--|----------|---------------|---------------------------|----------|
| <b>1. General Requirements</b>   |          |               |                           |          |
| a. Adoption of policy by governing Board   | ND       | No deficiency |                           |          |
| b. Public notice requirements  |          |               |                           |          |
| (1) a statement that the agency operates programs without regard to race, color, and national origin;  | ND       | No deficiency |                           |          |
| (2) a description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations; and  | ND       | No deficiency |                           |          |
| (3) a description of the procedures that members of the public should follow in order to file a discrimination complaint against the grantee or subrecipient (should be published in each language for which the grantee has determined there is an LEP population). | ND       | No deficiency |                           |          |
| c. Complaint Procedures  |          |               |                           |          |
| (1) procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request  | ND       | No deficiency |                           |          |
| (2) complaint procedures and form should be posted on agency website   | ND       | No deficiency |                           |          |
| d. List of Title VI related complaints/investigations  |          |               |                           |          |
| (1) prepare and maintain a list of any Title VI related active investigations conducted by entities other than FTA, lawsuits, or complaints  | ND       | No deficiency |                           |          |

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| (2) the list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint   | ND       | No deficiency  |                           |          |
| e. Public Participation and Outreach Plan   |          |                |                           |          |
| (1) public participation plan to consider the viewpoints of minority, low-income, and LEP populations that offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions  | ND       | No deficiency  |                           |          |
| f. Language Assistance Plan for LEP persons   |          |                |                           |          |
| (1) take steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP)   | ND       | No deficiency  |                           |          |
| (2) conduct a four factor analysis and develop a language assistance plan   | ND       | No deficiency  |                           |          |
| g. Planning Board, Advisory Council/Committee racial breakdown  |          |                |                           |          |
| (1) recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees | ND       | No deficiency  |                           |          |
| h. Subrecipient monitoring  |          |                |                           |          |
| (1) narrative description of how agency monitors subrecipients for compliance with the regulations  | NA       | Not applicable |                           |          |
| i. Equity Analysis for construction projects  |          |                |                           |          |

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| (1) if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility | NA       | Not applicable |                           |          |
| <b>2. Requirements of Fixed-Route Transit Services</b>  |          |                |                           |          |
| a. System-wide standards and policies (for each mode)   | NA       | Not applicable |                           |          |
| (1) quantitative service standards necessary to guard against discriminatory service design or operations decisions   |          |                |                           |          |
| · Vehicle load factor   |          |                |                           |          |
| · Headways  |          |                |                           |          |
| · On-time performance   |          |                |                           |          |
| · Service availability  | NA       | Not applicable |                           |          |
| (2) service policies necessary to guard against discriminatory service design or  |          |                |                           |          |
| · Distribution of amenities   |          |                |                           |          |
| · Vehicle assignment  |          |                |                           |          |
| b. Data collection and reporting requirements   | NA       | Not applicable |                           |          |
| (1) prepare demographic and service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations  |          |                |                           |          |
| (2) collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys  |          |                |                           |          |
| (3) develop a demographic profiles comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders  |          |                |                           |          |
| (4) collect data on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses   | NA       | Not applicable |                           |          |

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| (5) demographic information shall be displayed in tabular format | NA       | Not applicable |                           |          |

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| c. Monitoring transit services   |          |                |                           |          |
| (1) use the minority transit route definition (i.e., at least one-third of the revenue miles are located in a minority Census block, Census block group, or traffic analysis zone) to implement this monitoring program. Transit providers shall select a sample of minority and nonminority routes from all modes of service provided | NA       | Not applicable |                           |          |
| (2) assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies   | NA       | Not applicable |                           |          |
| (3) compare the transit service observed in the assessment to the transit provider's established service policies and standards  | NA       | Not applicable |                           |          |
| (4) For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, the transit provider shall analyze why the discrepancies exist, and take steps to reduce the potential effects  | NA       | Not applicable |                           |          |
| (5) evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner   | NA       | Not applicable |                           |          |
| (6) develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities   | NA       | Not applicable |                           |          |
| (7) brief and obtain approval from the transit providers' policymaking officials, generally the board of directors or appropriate governing entity responsible for policy decisions regarding the results of the monitoring program  | NA       | Not applicable |                           |          |
| (8) submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official(s)'s consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI Program | NA       | Not applicable |                           |          |

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| d. Evaluate service and fare equity changes (when applicable); Service equity for "major" service changes and all fare changes | NA       | Not applicable |                           |          |
| e. Service Equity Analysis shall:  | NA       | Not applicable |                           |          |
| (1) identify what constitutes a "major service change subject to a service equity analysis;                                    |          |                |                           |          |
| (2) define and analyze adverse effects;  |          |                |                           |          |
| (3) policy for measuring disparate impacts for minority populations and disproportionate burden for low income populations;    |          |                |                           |          |
| (4) engage the public in the decision-making process;  |          |                |                           |          |
| (5) describe the dataset(s) the transit provider will use in the service equity analysis; and                                  |          |                |                           |          |
| (6) evaluate the impacts of proposed service changes on minority and low-income populations.                                   |          |                |                           |          |
| (f) Fare Equity Analysis shall:  | NA       | Not applicable |                           |          |
| (1) analyze any available information generated from ridership surveys;  |          |                |                           |          |
| (2) determine the number and percent of users of each fare media being changed;  |          |                |                           |          |
| (3) review fares before the change and after the change;   |          |                |                           |          |
| (4) compare the differences for each particular fare media between minority users and overall users; and                       |          |                |                           |          |
| (5) develop a policy for measuring disparate impact and disproportionate burden;   |          |                |                           |          |
| (6) engage the public in the decision-making process; and  |          |                |                           |          |
| (7) evaluate the effects of all fare changes on Title VI protected populations and low-income populations.                     |          |                |                           |          |
| <b>3. Requirements for MPOs</b>  |          |                |                           |          |
| (a) All general requirements as described in Section 1 of this document  | NA       |                |                           |          |
| (b) Demographic profile of metropolitan area   | NA       | Not applicable |                           |          |
| (1) Identification of locations of minority populations in the aggregate   |          |                |                           |          |

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| (c) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process   | NA       | Not applicable |                           |          |
| (d) Demographic maps<br>(1) overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level<br>(2) Charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes   | NA       | Not applicable |                           |          |
| (e) An analysis of impacts identified from above maps<br>(1) Identification of any disparate impacts on the basis of race, color, or national origin<br>(2) Determination of whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts<br>(3) Policy alternatives that could be employed that would have a less discriminatory impact | NA       | Not applicable |                           |          |
| (f) Planning activities<br>(1) Title VI compliance reporting for planning activities<br>(2) MPO self certification of compliance  | NA       | Not applicable |                           |          |