Joplin Area Transportation Study Organization



Title VI Program

Approved: _____

For more information, please contact:
Title VI Coordinator
City of Joplin
602 S Main, Joplin, MO 64801
417-624-0820, ext. 210

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TITLE VI ASSURANCES

JATSO 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.

JATSO 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. JATSO 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.

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

AGENCY INFORMATION

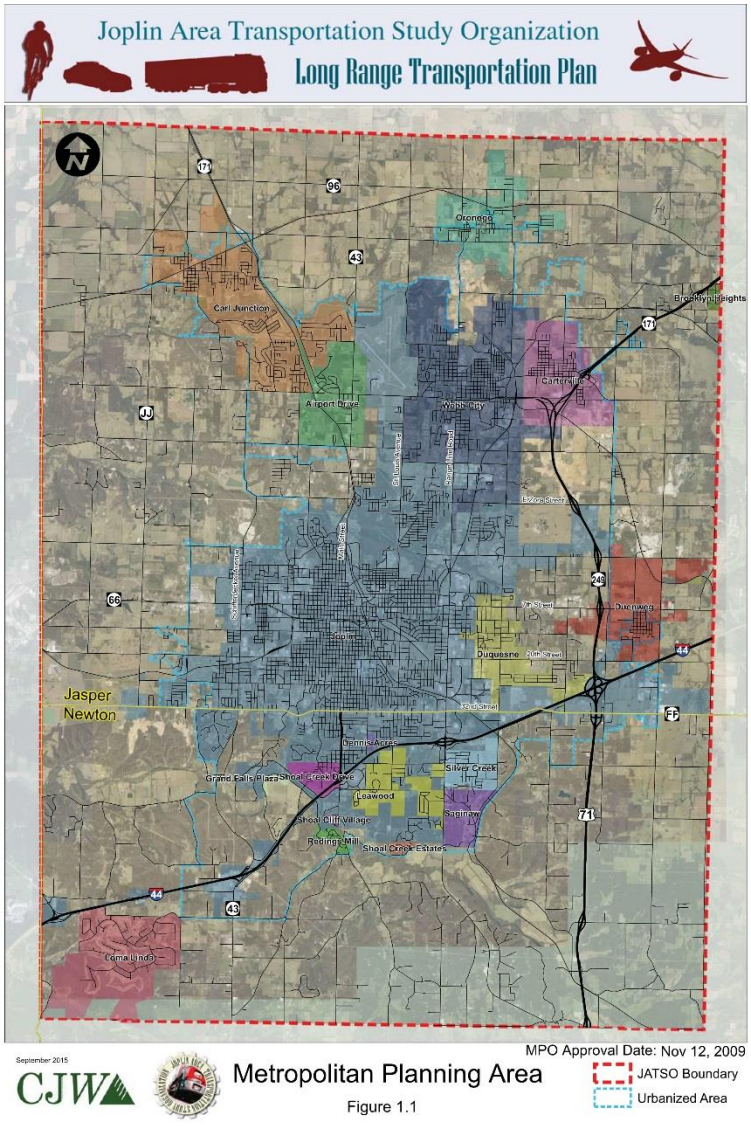
The Joplin Metropolitan Planning Area (MPA) is the federally designated MPA for the Joplin metropolitan area. An MPO is required to conduct a "continuing, cooperative, and comprehensive" regional transportation planning and project programming process for the MPO's metropolitan planning area. The Joplin Area Transportation Study Organization (JATSO) metropolitan planning area is comprised of many jurisdictions; representatives from municipal, county, and state agencies meet periodically through a policy board that oversees and approves MPO actions. The various agencies represented directly by the voting members of policy board are the City of Joplin (includes MAPS and Sunshine Lamp Trolley transit and Joplin Regional Airport representation), City of Webb City, City of Carl Junction, Jasper County, Newton County, the Southwest District of the Missouri Department of Transportation, and the Harry S Truman Coordinating Council (HSTCC).

HSTCC is the Regional Planning Commission that provides community planning services for a four county area in Southwest Missouri; two of those counties are Jasper and Newton. HSTCC is the representative

for the smaller municipalities within the Metropolitan planning area including Airport Drive, Brooklyn Heights, Carterville, Cliff Village, Dennis Acres, Duenweg, Duquesne, Grand Falls Plaza, Leawood, Loma Linda, Oronogo, Saginaw, Shoal Creek Drive, Shoal Creek Estates, Silver Creek, and Redings Mill.

The Metropolitan planning area including jurisdictional boundaries is shown on Figure 1. The blue line represents the existing urbanized area boundary which is defined by the United States Census Bureau as, "50,000 or more people." JATSO is also required to develop transportation plans that include areas that are not currently urbanized, but can be expected to urbanize over the next 20 years. This 20-year area boundary directly corresponds to the extent of the JATSO Metropolitan planning area jurisdiction and is represented by the red line.

FIGURE 1: JATSO PLANNING AREA MAP



Notice to the Public

Notifying the Public of Rights under Title VI

JATSO posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on MAPS buses and/or paratransit vehicles. JATSO 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, sex, disability, age, income status, limited English proficiency, or national origin by JATSO, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

Procedure for Filing a Title VI Program Complaint

JATSO has a standard process for investigating all complaints. Members of the public may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. Full procedures for filing a complaint and JATSO procedures for investigating complaints can be found as Attachment A. At a minimum, the complaint should include the following information:

- Name, mailing address, and how to contact complainant (phone number, email address, etc.)
- How, when, where, and why complainant alleges he/she were discriminated against. Include the location, names and contact information of any witnesses.
- Other significant information related to the complaint.

The complaint may be filed in writing to JATSO at the following address:

Title VI Complaint Officer
602 S. Main
Joplin, MO 64801

Title VI Complaints, Investigations, Lawsuits and Evidence of Agency Staff Title VI Training

Over the reporting period, JATSO had no Title VI complaints, investigations, or lawsuits filed against it pertaining to services provided by JATSO. There have been no civil rights compliance reviews conducted by other local, state, or federal agencies during the last 3 years.

Public Participation Plan

See Attachment C.

Language Assistance Plan

See Attachment B.

Advisory Bodies

JATSO has a Policy Board that meets quarterly and as needed to facilitate discussion and make decisions regarding transportation policies and programming in the Joplin metropolitan planning area. The Harry S. Truman Coordinating Council, the local regional planning commission, represents the smaller villages and unincorporated area on the JATSO Policy Board. The JATSO organization consists of six members from the City of Joplin, and one member from each of the following: Harry S. Truman Coordinating Council, City of Webb City, City of Carl Junction, MoDOT Southwest District, Newton County, and Jasper County.

Subrecipient Assistance

JATSO does not pass through federal funding to any sub-recipients.

Subrecipient Monitoring

JATSO does not pass through federal funding to any sub-recipients.

Equity Analysis of Facilities

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

Title VI Program Complaint Form

Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____ Phone Number: _____

Were you discriminated against because of:

- ○ Race
- ○ National Origin
- ○ Color
- ○ Other

Date of alleged incident: _____

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed, please use the back of the form.

_____

_____

_____

_____

_____

_____

_____

_____

Have you filed this compliant with any other federal, state, or local agency; or with any federal or state court?

- ○ Yes
- ○ No

If yes, please check all that apply:

- ○ Federal agency
- ○ State Agency
- ○ Federal Court
- ○ State Court
- ○ Local agency

Please provide information about a contract person at the agency/court where the complaint was filed.

Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____ Phone Number: _____

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

_____ _____

Signature Date

Please mail this form to:
City of Joplin
Attn: Title VI Complaint Officer
602 S. Main Street
Joplin, MO 64801

Joplin Area Transportation Study Organization

Limited English Proficiency Plan

Approved: _____

For more information, please contact:
Transportation Planner
City of Joplin
602 S Main, Joplin, MO 64801
417-624-0820, ext. 511

INTRODUCTION

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being Limited English Proficient, or "LEP."

> *Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

The US Department of Transportation published *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Person* in the December 14th, 2005 Federal Register. The guidance explicitly identifies JATSO's as organizations that must follow this guidance:

> *The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.*

To assist the JATSO and Joplin in meeting Title VI and Limited English Proficiency requirements of the Federal Highway Administration and the Federal Transit Administration, the Joplin Area Transportation Study Organization is conducting an evaluation on what activities would be appropriate for compliance with Limited English Proficiency requirements for the JATSO.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP persons who need language assistance.
2. Identifying ways in which language assistance will be provided.
3. Training staff.
4. Providing notice to LEP persons.
5. The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the USDOT.

These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the JATSO and overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

The DOT guidance is modeled after the Department of Justice's guidance and requires recipients and subrecipients to take steps ensure meaningful access to their programs and activities to LEP persons. More information for recipients and subrecipients can be found at http://www.lep.gov.

THE FOUR-FACTOR ANALYSIS

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to public transit services within the JATSO area. Recommendations are then based on the results of the analysis.

FACTOR 1: THE PROPORTION, NUMBERS AND DISTRIBUTION OF LEP PERSONS

The Census Bureau has a range of 4 classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all.'

For our planning purposes, we are considering people that speak English 'not well' or 'not at all' as Limited English Proficient persons.

Table 1 shows the number and percent of persons in regards to their English language skills for the JATSO Metropolitan Planning Area and the portions each county within the planning area.

Table 1. Limited English Proficient Persons in the JATSO Planning Area

	Total Population 5 years old and older	Number of Limited English Proficient Persons	Percent of Limited English Proficient Persons
Portion of Jasper County within JATSO	68,456	521	0.76%
Portion of Newton County within JATSO	14,006	61	0.43%
All of JATSO Planning Area	82,462	582	0.7%

Source: American Community Survey 2014

Of the LEP persons within the JATSO metropolitan planning area 54.3 percent speak Spanish, 9.2 percent of LEP persons speak an Indo-European language (such as Urdu, Hindi, Portuguese, Bengali, Russian, Persian and German.), 36.4 percent of persons speak Asian-and Pacific Languages (E.g., Chinese, Korean, Japanese, and others and 0.0 percent speak other languages.

For our planning purposes, we are considering people that speak English 'not well' or 'not at all' as Limited English Proficient "LEP" persons.

Table 2 shows the actual numbers of language groups spoken by LEP persons, within the JATSO planning area.

Table 2. Language Spoken by LEP Persons in Joplin Metropolitan Planning Area					
	Spanish Language Spoken	**Indo-European Language Spoken**	**Asian and Pacific Islander Language Spoken**	**Other Language Spoken**	**Total LEP**
5-17 years-old	59	0	0	0	59
18-64 years-old	257	54	212	0	523
65 and older	0	0	0	0	0
Total	***316***	***54***	***212***	***0***	***582***
Source: American Community (ACS) Survey 2014					

Factor 2: Frequency of Contact with LEP Individuals

Traditionally, JATSO open houses and workshops have been located within facilities offered by the City of Joplin. JATSO staff has found there have been no formal records, indicating direct contact with the LEP population at public involvement meetings, other public meetings or in day-to-day activity since the JATSO was formed.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community

As the agency responsible for coordinating the regional transportation planning process, the

JATSO must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process. JATSO provides oversight and helps ensure that LEP and other protected classes of persons are not overlooked in the transportation planning process.

JATSO's main function is to support cooperative, comprehensive, and continuing transportation planning as outlined in federal transportation acts. In doing so, JATSO develops three main documents: the Metropolitan Transportation Plan (MTP), Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP), and as needed, other studies. The MTP provides direction for transportation investments out to 20 years in the future. The TIP is a program or schedule of short-range transportation improvements and activities intended to be implemented through a combination of State, Federal and local funding. The UPWP outlines tasks to be performed in the upcoming year.

Denial or delay of access to services or information provided by JATSO would not have life threatening implications on a LEP individual, due to the structure of JATSO board as an advisory and planning organization. It is also believed that denial or delay of access to services or information provided by JATSO would not have serious implications on a LEP individual, especially compared to the services, such as

health, emergency transportation, water, sewer, fire protection, police protection and other emergency services, provided by JATSO member organizations. JATSO does not operate under any emergency capacity.

FACTOR 4: THE RESOURCES AVAILABLE TO THE JATSO AND OVERALL COST

US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

> *Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan.*

While JATSO does serve few LEP persons and has very limited resources it has been decided to include a LEP section in the Public Involvement Plan with the acknowledgement that current demographic trends indicate the number of LEP persons may increase within the JATSO planning area. Currently JATSO uses oral translation, due to the limited contact with the LEP population. Funding available for LEP services would be derived entirely from existing JATSO operating funds, and competes with other operational requirements of the JATSO.

Since all members of JATSO are required to adhere to Presidential Executive Order 13166, it is reasonable that utilization of member organizations' LEP resources is a preferred option for the JATSO.

SAFE HARBOR STIPULATION

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "Safe Harbor'' means that if a recipient provides written translations certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. JATSO's Translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

No LEP language groups in the JATSO planning area constitutes the 5% or 1,000 persons of population threshold for which written translations of vital documents can be provided meet the safe harbor standard. However, given the small number of LEP language group members, the JATSO budget and the number of staff, it is deemed that written translations of core documents would impose a cost that would substantially exceed the benefits and defeat the legitimate objectives of our programs. It is more appropriate for JATSO to proceed with oral interpretation options for compliance with LEP regulations.

PROVIDING NOTICE TO LEP PERSONS

USDOT LEP guidance says:

> *Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.*

The guidance provides several examples of notification including:

1. Signage when free language assistance is available with advance notice.
2. Stating in outreach documents that language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individual of the recipient's services, including the availability of language assistance services.
4. Using automated telephone voice mail attendant or menu which can provide information about available language assistance services and how to get them.
5. Including notices in local newspapers in languages other than English.
6. Providing notices on non-English-language radio and television states about the available language assistance services and how to get them.
7. Providing presentations and/or notices at schools and religious organizations.

The JATSO will provide statements in public information and public notices, as outlined in our Public Involvement Plan, that persons requiring language assistance or special accommodations will be provided, with reasonable advance notice to the JATSO.

OPTIONS & PROPOSED ACTIONS

Federal fund recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.

JATSO is defining an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

Considering the relatively small scale of the JATSO in Joplin, the small number of LEP individuals in the service area, and limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Many options were discussed and considered by JATSO staff.

- Identifying existing staff of JATSO member organization to be used as translators and interpreters. JATSO members employ over 500 people. It is assumed that some staff would be proficient in a second language, particularly Spanish, and would be available, with advanced notice to provide interpretation services. A survey of staff and their language skills could be conducted and the development of a formal procedure/policy may be put in place. Minimal direct expenses would be incurred.

- Entering into a bulk telephonic interpretation service contract to achieve economies of scale.

- Several national and international companies offer this type of service for a pay-as-you-go fee.

- Using community volunteers. This option could be used where advanced notice is provided that translator services would be required. A list of volunteers would need to be developed.

- Development of written translation and oral interpreter service providers' database. Several interpretation services are under State of Missouri contracts that provide for cooperative purchasing.

- Utilize JATSO member organization's LEP services outlined in their LEP plans, as they are developed.

- Ensure JATSO members are aware of the USDOT LEP guidance and support their LEP planning activities, as appropriate.

- Revisit the plan when events (2020 decennial census or other indication of increase of LEP persons) warrant.

WHAT THE JATSO WILL DO: WHAT ACTIONS WILL THE JATSO TAKE?

With advance notice of seven calendar days, the JATSO will provide interpreter services at the Policy Board meetings, through the City of Joplin, as administrator for the JATSO. Interpreter to include foreign language and hearing impaired. All LEP services will be available free of charged.

The JATSO will utilize a database of interpreters, primarily but not exclusively based on the Missouri Office of Administration cooperative purchasing agreement for translation services and verbal interpretation. (See Attachment A: Missouri Office of Administrator --- Cooperative Procurement Program --- Translation and Interpretation Services)

Placement of statements in notices and publications that interpreter services are available for these meetings, with seven days' advance notice.

Publication of JATSO and federal complaint forms on the website, available at public meetings, and reference to these forms on what they are for and where to get them, in the LEP and Public Involvement Plans.

Notices of the JATSO non-discrimination policies and information on the local and federal complaint process will be placed on the website and available in public meetings.

JATSO STAFF TRAINING

JATSO staff will be provided training on the requirements for providing meaningful access to services for LEP persons.

INCLUSION IN THE PUBLIC INVOLVEMENT PLAN

The JATSO will include a Limited English Proficiency policy in the updates of the JATSO Public Involvement Plan through 1) statements and notices that interpreters will be provided, upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact database for interpretation providers**.**

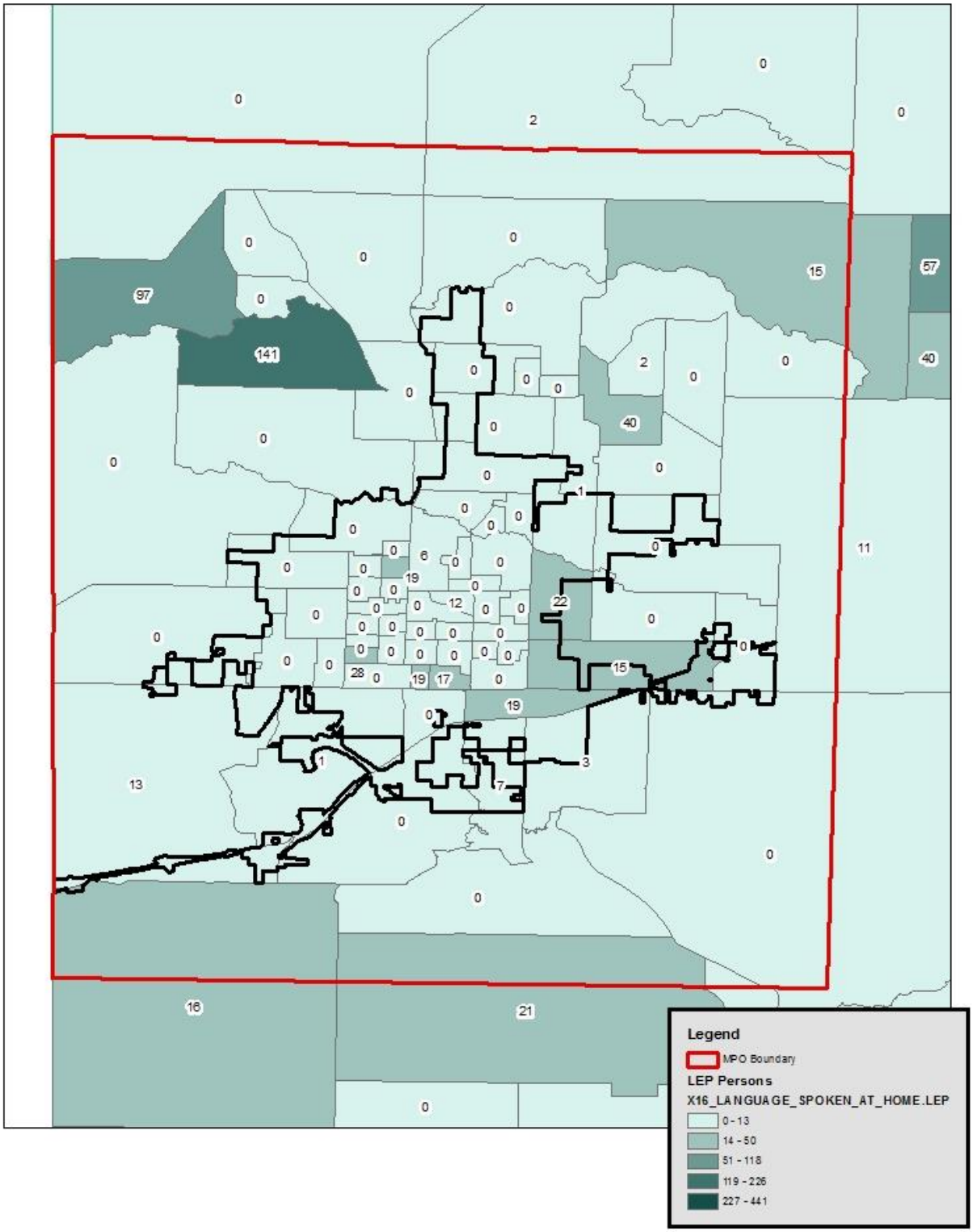
LEP PLAN ACCESS

The JATSO will post the LEP Plan on its website at: jatso.net

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal Internet service, several area libraries offer free Internet access. Please contact your local library to determine if this service is available. Copies of the LEP Plan will be provided to the each JATSO member organization, the Missouri Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy.

Any questions or comments regarding this plan should be directed to the JATSO staff.

Limited English Proficient Persons by Census Block Group



Joplin Area Transportation Study Organization

Public Participation Plan

Approved: _____

For more information, please contact:
Transportation Planner
City of Joplin
602 S Main, Joplin, MO 64801
417-624-0820, ext. 511

JATSO TITLE VI NONDISCRIMINATION POLICY

The Joplin Area Transportation Study Organization is committed to the policy that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity on the grounds of race, color, sex, age, disability or national origin, in accordance with Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259).

JATSO ORGANIZATIONAL CHART

Staff is located at the City of Joplin offices and are dedicated to JATSO activities.

Full-time Staff

Robert Lolley, Transit Coordinator (1.0 FTE)

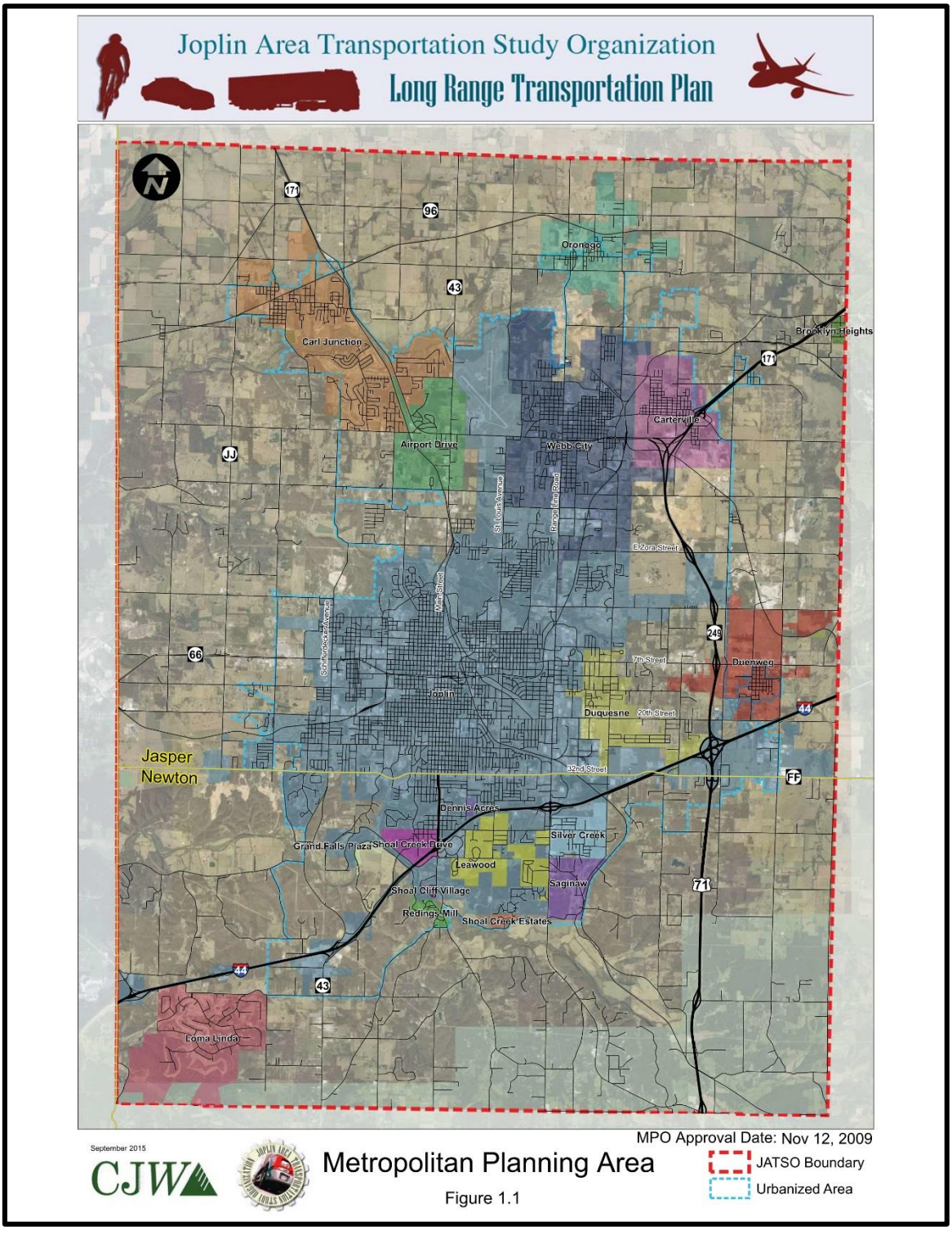
Part-time Staff

Troy Bolander, MPO Staff Director (0.5 FTE)
Taylor Cunningham, Planner (0.8 FTE)
John Gilligan, GIS Coordinator (0.5 FTE)
Lindsay Dunn, Clerk (0.25 FTE)

JATSO Policy Board Voting Members

Chairman Nick Heatherly	**Director of Public Works**	**City of Joplin**
Vice Chairman Troy Bolander	Director of Planning, Development, and Neighborhood Services	City of Joplin
Dan Salisbury	Assistant Director of Public Works	City of Joplin
Lynden Lawson	Assistant Director of Public Works – Operations	City of Joplin
Robert Lolley	Transit Coordinator	City of Joplin
Steve Stockham	Airport Manager	City of Joplin
Carl Francis	Interim City Administrator	City of Webb City
Steve Lawver	City Administrator	City of Carl Junction
Jill Cornett	Director	Harry S. Truman Coordinating Council
Darieus Adams	Commissioner	Jasper County
Marilyn Ruestman	Commissioner	Newton County
Becky Baltz	Southwest District Engineer	Missouri Department of Transportation
Nicki Hill, Alternate	Transportation Planner	Harry S. Truman Coordinating Council
Frank Miller, Alternate	Senior Transportation Planner	Missouri Department of Transportation

JATSO METROPOLITAN PLANNING AREA BOUNDARY MAP



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INTRODUCTION

Meaningful public participation is important so that the concerns of a diverse community of stakeholders and general public can be represented in the transportation planning process. The Joplin Area Transportation Study Organization is committed to proactively involving the public in identifying and addressing transportation issues. The goal is to foster genuine two-way communication between the MPO and users of the area's transportation system.

This plan is intended to ensure that public participation is an integral and effective part of JATSO activities and that decisions are made with the benefit and consideration of a wide range of public perspectives. Regular public participation enables JATSO to make informed decisions, improve quality through collaborative efforts, and build mutual understanding and trust between JATSO and the public it serves.

Public participation requirements derive from many sources, most importantly with the requirement reiterated in the most recent federal transportation law, Moving Ahead for Progress in the 21st Century (MAP-21), which states:

> *"The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process."*

The Joplin Area Transportation Study Organization (JATSO) MPO is the federally designated regional transportation planning organization that serves as a forum for cooperative transportation decision-making by state and local governments, and regional transportation and planning agencies. MPOs are charged with maintaining and conducting a "continuing, cooperative, and comprehensive" regional transportation planning and project programming process for JATSO's study area. The study area is defined as the area projected to become urbanized within the next 20 years.

The MPO Policy Board includes representation from

- City of Joplin
- City of Webb City
- City of Carl Junction
- Metro Area Public Transit System (MAPS)
- Harry S. Truman Coordinating Council, and
- Southwest District of the Missouri Department of Transportation.

The "Fixing America's Surface Transportation Act" (FAST Act), signed into law on December 4, 2016 by President Barack Obama, contains specific language outlining federal requirements regarding public involvement processes and procedures. In general, the Fast ACT legislation built upon previous transportation legislation (MAP-21, ISTEA, TEA-21 and SAFETEA-LU) to provide states and metropolitan planning organizations specific direction in conducting and promoting broad-based public involvement activities. FAST Act Legislation requires metropolitan planning organizations to provide citizens, affected

public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.

In addition, the Public Participation Plan shall be developed in consultation with all interested parties and shall provide that all interested parties have reasonable opportunities to comment on the contents of the transportation plan. Beyond the federal requirements, participation by citizens, affected public agencies, community groups, and other interested parties is an important part of a successful public planning program.

EVALUATION OF EFFECTIVENESS

Since the last update in 2009, JATSO has evaluated the successes and failures of various methods of public participation previously undertaken and has been working on addressing these results. This evaluation has taken place as a series of discussions between JATSO, the Federal Highway Administration, the Federal Transit Administration, and the Missouri Department of Transportation. The public participation plan (PPP) is required by federal regulation (23 CFR 450.316) to periodically review "the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open process." The PPP an is a document that must evolve over time.

The 2016 updated PPP includes:

- Expanded public comment periods for the Metropolitan Transportation Plan and the Transportation Improvement Program to provide more time for the public to review and comment on these documents.
- Newly developed goals, strategies, and desired outcomes so that the public involvement process may be defined and executed in a clear way.
- Guidelines outlined in 23 CFR 450.316 to increase clarity and accountability.

GENERAL GUIDELINES

This Public Participation Plan is intended to provide direction for public involvement activities to be conducted by JATSO and contains the policies, objectives, and techniques used by JATSO for public involvement. In its public participation process, JATSO will:

1. Provide timely information about transportation issues and processes to citizens, affected public agencies, representatives of transportation agencies, private providers of transportation, other interested parties and segments of the community affected by JATSO's plans, programs and projects (including but not limited to local jurisdiction concerns).

2. Provide reasonable public access to technical and policy information used in the development of the Metropolitan Transportation Plan, the Transportation Improvement Program, and other JATSO plans, programs and projects, and conduct open public meetings where matters related to transportation programs are being considered.

3. Give adequate notice of public participation activities and allow time for public review and comment at key decision points including, but not limited to, approval of the Metropolitan Transportation Plan, the Transportation Improvement Program, and other JATSO plans, programs and projects, as well as review of environmental impact.

4. If the final draft of any JATSO plan, program or project differs significantly from the one available for public comment by JATSO and raises new material issues, which interested parties could not reasonably have foreseen, an additional opportunity for public comment on the revised plan, program or project shall be made available.

5. Solicit the needs of those under-served by existing transportation systems, including but not limited to the transportation disadvantaged, minorities, elderly, persons with disabilities, limited English proficiency (LEP), and low-income households. JATSO shall provide reasonable opportunities for affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on JATSO's plans, programs and projects.

6. Coordinate the public participation process with statewide public participation processes wherever possible to enhance public consideration of the issues, plans and programs, and reduce redundancies and costs.

7. Ensure that the requirements of Title VI of the Civil Rights Act of 1964 are met and that appropriate actions are taken during all phases of public involvement to comply with the Americans with Disabilities Act. JATSO shall not exclude any person from participating in any program receiving federal assistance on the basis of race, color or national origin and shall undertake reasonable effort to accommodate citizens with disabilities who wish to attend public meetings.

8. Continuously evaluate the public participation process to verify it is adequately addressing the needs of JATSO stakeholders.

9. Upon receiving public comments, JATSO will respond in a timely manner (within 48 hours if staffing permits) and provide summaries of comments to appropriate boards and committees, and related agencies. All comments will be documented by JATSO staff to measure effectiveness of outreach activities, per the annual evaluation report.

10. A summary, analysis, and report on the disposition of comments shall be made as part of the final Metropolitan Transportation Plan and the final Transportation Improvement Program.

PARTICIPATION POLICIES

Goal: To provide the public with thorough information on transportation planning and project development in a convenient and timely manner.

STRATEGY 1: ENGAGEMENT

PUBLIC AND STAKEHOLDER INVOLVEMENT

JATSO will engage the public in the transportation planning process according to the policies contained in this public participation plan and to the requirements of state and federal laws through timely information, public notification of activities and documents, accessible public meetings, and availability for questions and queries. In addition to the general public, JATSO will solicit the needs of those traditionally underserved by existing transportation system, such as elderly, disabled, low income and minority households who may have difficulty accessing or participating in community planning activities, through its public participation process.

State and local agencies, and officials responsible for planning activities within the Metropolitan Planning Area that are affected by transportation, will be consulted in the development of the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP) planning activities to the maximum extent practicable. Many of these entities, such as local entities involved with planned growth, economic development, environmental protection, airport operations or freight transportation, are represented on the JATSO Policy Board or ad hoc subcommittees and technical groups.

To support outreach to stakeholders, interested parties and the public, JATSO maintains a database of contacts so that these parties may be notified when plans, studies or other activities are planned, and that they may have reasonable opportunities to comment on and/or participate in activities, products, and other planning activities, and Policy Board meetings, subcommittees, panels, and focus groups. Listed below are the broadly defined stakeholder groups that JATSO interacts with:

- Elected Officials
- Emergency Service Providers
- Transportation Providers
- Freight Service Providers
- Economic Development
- Business Community
- Tourism
- Government (Local, State, Federal)
- Non-Motorized
- Community Organizations
- Protected Class Advocates (aging, mobility)
- Environmental

STRATEGY 1 DESIRED OUTCOMES

JATSO, as a public entity, is required by law, as well as ethically obligated, to not only make the public and stakeholders aware of activities the MPO does, but also actively engage them in dialogue, and encourage their participation in every step of each project. Strategy one attempts to lay a clear path to do so.

The Joplin Area Transportation Study Organization is taking these steps to make sure that lines of communication remain open between stakeholders, as well as the public, throughout any planning processes undertaken.

STRATEGY 2: MEETINGS

MEETING AND PUBLIC NOTICE PROCEDURES

Public meetings will be held at locations and times convenient and accessible to citizens. Every effort is made to locate meetings at locations and times where and when public transportation is available.

Public notices for meetings, public comment periods, public hearings, other planning activities and notification of publications available for public access (regarding new plans and documents or proposed changes to the Public Participation Plan, Metropolitan Transportation Plan, Transportation Improvement Program and other documents) will be sent to the following locations for public posting and notification of local officials:

Posted notices may be found:

- City Clerk, City of Joplin
- City Clerk, Webb City
- City Clerk, Carl Junction
- City of Joplin Public Library
- Webb City Public Library

Notified agencies include:

- Harry S. Truman Coordinating Council
- Metro Area Public Transit System (MAPS)
- Missouri Department of Transportation
- Federal Highway Administration
- Federal Transit Administration

Public notices are also emailed to the JATSO Policy Board, parties having requested notice, and members of the media. Parties may request notice by contacting JATSO staff at (417) 624-0820. Public notices are also posted on the JATSO website and promoted through the City of Joplin's social media pages. Notices regarding updates to the Metropolitan Transportation Plan and Public Participation Plan are sent to all local media outlets via a news release from the City of Joplin's Public Information Office.

Notices for the development of planning documents or changes to the documents will contain: 1) Notice that documents are being developed or amended, and how they may be accessed; 2) the duration of the public comment period; 3) instructions for submitting comments; and 4) the date, time, and location of public meetings.

As required by Missouri Revised Statutes, Chapter 610, RSMo, when providing notices for a meeting, pending a revision of the JATSO bylaws, JATSO will adhere to the requirements of the Missouri Sunshine Law and provide a minimum of 24 hours' notice before the meeting.

EMERGENCY MEETINGS

In the event that an emergency meeting must be held the Chairperson of the Policy Board or the Vice-Chair in the absence of the Chairperson, is authorized to call a special meeting to discuss the proposed business. When it is necessary to hold a meeting with notice of less than twenty-four hours, the nature of the good cause justifying that departure from the normal requirements shall be stated in the minutes. A quorum of members is required to be physically present at the meeting location, but additional

members may participate and vote via telephone, facsimile, Internet, or any other voice or electronic means. In the event the emergency meeting is considered a "closed meeting" under the Missouri Sunshine Law, members who are not physically present may vote as if they are present. In all cases the nature of the emergency of the public body justifying the departure from the normal requirements shall be stated in the minutes of the meeting.

STRATEGY 2: DESIRED OUTCOMES

JATSO is committed to maximizing local jurisdiction and citizen participation in the metropolitan transportation planning process. JATSO deliberately chooses venues accessible by pedestrian, transit, and automobile transportation and is sure to send out public notices through all available means. JATSO believes there is always room for improvement however, and endeavor to always increase participation, either through digital or in-person activities.

JATSO's goal is to realize more participation from the various municipalities and citizens located within the Joplin Metropolitan Planning Area (MPA). JATSO has made, and will continue to make, efforts for more inclusiveness in order to bolster the participation of members with the MPA.

STRATEGY 3: OUTREACH ACTIVITIES

LOCAL GUIDANCE

Local jurisdictions are encouraged to include public participation in the planning of projects and programs. JATSO will collect information on the public participation process used by the project sponsors as part of the project application review process.

OFFER DIRECTION

Upon request, staff will be available to meet with local officials, interested groups, or the public to discuss or present the MTP, TIP, Unified Planning Work Program (UPWP) or other plans, programs, and activities.

WEBSITE

The website will be maintained and updated with planning documents produced by JATSO, and to provide the most current and accurate transportation planning information available. The website will also contain public notices, meeting agendas, meeting minutes, Policy Board members, members, plans, studies and other information for the public's benefit.

SOCIAL MEDIA

JATSO is and will continue to actively participate in social media activities to supplement traditional public outreach activities. JATSO also endeavors to promote events of planning partners, when appropriate. In addition to the City of Joplin social media pages, JATSO, when appropriate, will send out an email blast, targeted to those that have expressed interest in projects as well as to persons the MPO thinks would find the subject matter of interest. As social media continues to evolve and expand, the MPO will evaluate new, future modes as they develop.

GETTING OUT INTO THE COMMUNITY

JATSO staff will actively make the effort to go out into the public, whether by invitation to go to meetings to make presentations, or to attend neighborhood meetings and other meetings with relevance to transportation, transit, pedestrian or bicycle themes, rail, or other possible topics.

NEEDS OF TRADITIONALLY UNDERSERVED POPULATIONS

JATSO is committed to implementing an effective process for soliciting the needs of those under-served by existing transportation systems, including but not limited to the transportation disadvantages, minorities, the elderly, persons with disabilities, limited English proficiency (LEP) and low-income households.

When sending out communiqués, JATSO makes every effort to reach out to community organizations, neighborhood groups, advocacy groups, and other underserved communities. The database that JATSO maintains is updated as new organizations are identified, either by recommendation or by research. This will be available on the JATSO website.

VISUALIZATION TECHNIQUES

Visualization techniques will be used in describing the Metropolitan Transportation Plan and the Transportation Improvement Program, including charts, graphs, photographs, maps, and the use of GIS systems or power point presentations.

STRATEGY 3 DESIRED OUTCOMES

JATSO is interested in conversations with the public and transportation stakeholders. To make this a possibility, Policy 3, above, proposes various means to have meaningful dialogues with people and groups outside of JATSO regular transportation planning partners. It is impossible to work effectively for the public in a vacuum. JATSO will work to integrate the use of modern social media into the JATSO's traditionally used public hearing/meeting techniques for the purpose of maximizing the continuous engagement of the public as a whole as well as interested stakeholders or advocates of various transportation means.

JATSO's goal is to reach as many different demographics as possible. The use of social media will allow JATSO the opportunity to engage more individuals of all age groups and races/ethnicities. As many people of all backgrounds have moved to smart phones, this is an excellent tool to reach a greater number of the public in this fashion. JATSO will conduct in-person meetings at locations along Metro-Area Public Transit (MAPS) routes to continue to ensure the continuous engagement of citizens without automobiles and that are more comfortable with face-to-face outreach.

JATSO recognizes its successful delivery of the various public outreach tools identified in Strategy 3, in combination with outreach techniques outlined in Strategy 1 and Strategy 2, as the foundation for achieving the increase of continuous local jurisdiction and citizen engagement in the Joplin metropolitan transportation planning process.

PUBLIC COMMENT PERIODS

Table 1 (below) shows the general information for the update frequency, public meetings comment period and committee action of primary JATSO plans and documents.

TABLE 1 – DOCUMENT UPDATE FREQUENCY AND PUBLIC COMMENT PERIODS

Document	Frequency	Public Comment Period	Committee Action
Metropolitan Transportation Plan	Every 5 years	14 calendar days	JATSO Policy Board: Approve
Metropolitan Transportation Plan Amendments	As needed	7 calendar days	JATSO Policy Board: Approve
Public Participation Plan	Periodically	45 calendar days	JATSO Policy Board: Approve
Transportation Improvement Program	Every 2 years	14 calendar days	JATSO Policy Board: Approve
Transportation Improvement Program Amendments	As needed	7 calendar days	JATSO Policy Board: Approve
Unified Planning Work Program	Every year	7 calendar days	JATSO Policy Board: Approve
Annual Listing of Obligated Projects	Every year	Posted on Website	None
Other Plans and Projects	As needed	As needed	JATSO Policy Board: Approve
Note: the public comment period will end two calendar days before the JATSO Policy Board meeting at which the document is approved or denied.			

MODIFICATIONS TO THE METROPOLITAN TRANSPORTATION PLAN AND TRANSPORTATION IMPROVEMENT PROGRAM

AMENDMENTS

An amendment made to the MTP or TIP involves a major change to a project and requires approval by the Policy Board. An amendment is a revision that requires public review, allowance of comment, possible re-demonstration of fiscal constraint, and includes at least one of the following: Addition or deletion of a project using FHWA or FTA funds, major changes affecting project cost from FHWA or FTA sources, major changes in a project phase initiation date, or major changes in design concept or design scope, such as changing project termini or changing the number of through traffic lanes that also includes a substantial increase in Federal cost. TIP amendments also require the approval of the Governor.

ADMINISTRATIVE MODIFICATIONS

Administrative modifications are revisions to the TIP and TIP projects that do not meet the criteria of an amendment will be considered administrative modifications including: minor changes to project/project phase costs, minor changes to funding sources of previously-included projects, and minor changes to project/project phase initiation dates. An administrative modification is a revision that neither requires committee action, public review and comment, nor re-demonstrates fiscal constraint.

The public comment period may be initiated by JATSO staff and will begin the day following the posting of the announcement on the JATSO website. Amendments to the Metropolitan Transportation Plan and Transportation Improvement Program, posted to JATSO's website, have a minimum period of 7 calendar days prior to the regularly scheduled Policy Board meeting. The public comment period notice will be placed in the announcement section of the JATSO webpage, sent as a news release from the City of Joplin's Public Information Office, and e-mailed to Policy Board members and other interested parties. The exception to the 7-day comment period is in the case of a time-critical emergency action item to amend the TIP.

Adopted policies and procedures regarding amendments, administrative modifications and related procedures for the development of the TIP are defined in Appendix C of the current Transportation Improvement Program that can be viewed on the JATSO website.

UPDATES TO THE ANNUAL UNIFIED PLANNING WORK PROGRAM

The Unified Planning Work Program, by regulation, is not required to undergo the public involvement process, but JATSO elects to place the UPWP on the JATSO website for public review and comment and notify interested parties of the UPWP development following the approval of the UPWP by the recommending approval to the Policy Board. Additionally, the UPWP is developed by staff and the and approved by the Policy Board. Each Policy Board meeting is a public meeting, open to all to attend and noticed in advance.

RESPONSES TO PUBLIC COMMENTS

If the responses to public comments results in the Metropolitan Transportation Plan, Transportation Improvement Program and other plan or program documents or amendments being significantly different from the draft document which was sent out for public review, an additional public comment period shall be held. Determination of the need for an additional comment period will be made by JATSO. If significant oral and written comments and responses are received, an appendix containing the comments and recommendations will be made part of the final document.

The JATSO's response to public comments on planning work products (i.e. MTP, TIP, UPWP) will be documented and provided to the Policy Board, and kept in JATSO comment files. Comments with JATSO responses will be included in planning work product appendices as summaries of public comments.

Often general comments regarding transportation policy, needs, or complaints are provided to JATSO. Action on these comments may include addressing the comment directly, by correspondence to a comment or question; referring comments to the correct recipient, either to different city/state departments; or sharing these comments with the governing bodies of municipalities within the JATSO.

Interested parties (including the public at large) may comment and make recommendations on any plan or program in person, by fax, email, social media or letter to

City of Joplin
Attention: JATSO
602 S Main Street
Joplin, MO 64801
(417) 624-0820

(417) 625-4738 (Fax)
tcunning@joplinmo.org

PROGRAM OF PROJECTS – APPROVAL AND PUBLIC PARTICIPATION

Metro Area Public Transit System (MAPS) is the public transit provider for the City of Joplin. Federal Transit Administration recipients of certain categories of funds, MAPS, must follow a public participation plan. The FTA allows a grantee, e.g., MAPS to rely on locally adopted public participation plans for the submittal of their projects in lieu of a separate "Program of Projects" (POP) if the grantee has coordinated with JATSO and ensured that the public is aware that the JATSO's plan is being used to satisfy the POP public participation requirements. MAPS meets this coordination and public awareness criteria JATSO's Public Participation Plan satisfies the Federal Transit Administration's requirement of public participation for their "Program of Projects."

The JATSO public participation process is used to satisfy MAPS' public participation process for the Program of Projects. Public notices for the TIP have an explicit statement that the public notice of public involvement activities and time established for public review and comments on the TIP will satisfy the Program of Projects requirements.

PUBLIC PARTICIPATION PLAN UPDATE AND REVIEW

The Public Participation Plan will be reviewed periodically and updated as conditions require. The following steps describe the process for the development and adoption of the Public Participation Plan. These procedures will be followed for any major revision to the Public Participation Plan.

1. At the direction of the JATSO Policy Board, JATSO staff will make proposed revisions to the PPP and initiate a 45-day public comment period by posting the proposed revisions on the JATSO website.
2. Announcements will be sent to the Interested Parties Contact List, local media and via social media. Copies will also be made available through electronic means via the internet, email and forwarded to locations identified previously for public posting and notification of local officials.
3. The Policy Board will hold a public meeting at least two calendar days after the public comment period ends to adopt proposed revisions.
4. If the Participation Plan has major revisions, another 45-day public comment period will occur. Printed Copies of the Public Participation Plan will be available at:

City of Joplin
Attention: JATSO
602 S Main Street
Joplin, MO 64801
(417) 624-0820
(417) 625-4738 (Fax)
tcunning@joplinmo.org

SPECIAL ACCOMMODATIONS

Persons requiring special accommodations for attendance at meetings, activities and functions because of a disability or physical impairment should contact the City of Joplin ADA Coordinator at (573) 634-6570 to request accommodations or alternative formats as required under the Americans with Disabilities Act. Please allow three business days to process the request.

JATSO maintains Limited English Proficiency and Title VI policies and performs periodic reviews of the both.

LANGUAGE ACCOMMODATIONS

As prescribed by the Limited English Proficiency Plan, JATSO will, when issuing statements or notices, note that interpreters or sign language professionals will be available upon advance notice of seven calendar days. JATSO will also maintain a contact database of interpreters in anticipation of this need.

NON-DISCRIMINATION POLICY

JATSO does not discriminate in the level and quality of transportation services and transit-related benefits based on race, color, national origin, sex, familial status, sexual orientation, religion, age, or disability and maintains information on and processes for complaints related to discrimination.

Persons who feel that they have been subjected to discrimination should contact the JATSO or federal offices for information on local and federal procedures and forms for discrimination complaints.

Those person or persons alleging discrimination as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration, and/or the U.S. Department of Transportation,

Federal Transit Administration
Office of Civil Rights
901 Locust Street, Room 404
Kansas City, MO 64106
Telephone 816-329-3920, or

Federal Highway Administration,
3220 West Edgewood, Suite H,
Jefferson City, MO 65109
Telephone: 573-638-2617

Any person who believes that they, individually, or as a member of any specific class of persons, has been subjected to discrimination may file a written complaint with the

Title VI Program Officer
Joplin City Hall
602 South Main Street
Joplin, Missouri 64801

They may also visit the JATSO website to learn about how to file a complaint directly to JATSO: http://www.joplinmo.org/index.aspx?NID=745.

Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Officer may be utilized for resolutions. The Title VI Program Officer will notify JATSO of all Title VI related complaints as well as resolutions.