

CITY OF BONNER SPRINGS
Governing Body Policy

Type Policy	Governing Body
Policy #	GB-13-01R

Subject	Tiblow Transit Public Transportation Title VI Program Plan
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Date Adopted	May 24, 2021
Prepared By	City Clerk
Approved By	Governing Body
Purpose	To adopt a program policy and plan for the Tiblow Transit Public Transportation Title VI Program.

The Governing Body hereby adopts the attached Tiblow Transit Public Transportation Title VI Program Plan dated May 24, 2021. The Tiblow Transit Title VI Program Plan provides public notice that Tiblow Transit Public Transportation operates its program and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. The plan provides the procedures and forms for any person to file a complaint who believes they were aggrieved by any unlawful discriminatory practice under Title VI.



City of Bonner Springs
KANSAS

City of Bonner Springs, Kansas
Tiblow Transit Public Transportation
Title VI Program Plan

Approved by: The City of Bonner Springs, Kansas and signed by the Mayor on May 24, 2021.

Jeff Harrington, Mayor

Attest:

Christina Brake, City Clerk

(Seal)

Notification to the Public of Rights Under Title VI
**Bonner Springs Tiblow Transit
Public Transportation**

- Bonner Springs Tiblow Transit public transportation operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Bonner Springs Tiblow Transit public transportation.
- For more information on the City of Bonner Springs Tiblow Transit public transportation civil rights program and the procedures to file a complaint, contact the City Clerk at 913-913-422-1020 or email cbrake@bonnersprings.org or visit our Administrative Office at 200 E. Third Street, Bonner Springs, KS 66012.

For more information, visit www.bonnersprings.org under the Public Transportation department.

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

This notice posted on the City Hall front lobby bulletin board and on the City's website at

<http://www.bonnersprings.org>, [Public Transportation](#).

City of Bonner Springs Tiblow Transit Public Transportation

Title VI Complaint Procedure

The following pertains only to Title VI complaints about services provided by the Bonner Springs Tiblow Transit public transportation.

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Bonner Springs Tiblow Transit public transportation has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter III of the Federal Transit Administration Circular 4702, IB, dated February 27, 2020. If you believe that the Bonner Springs Tiblow Transit public transportation's federally funded programs discriminated your civil rights on the basis of race, color, or national origin, you may file a written complaint by following the procedure outlined below.

1. Submission of Complaint.

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the Bonner Springs Tiblow Transit Public Transportation may file a written complaint with the City of Bonner Springs City Clerk. A sample complaint form is available for download at www.bonnersprings.org and is available in hard copy at the office of Bonner Springs City Clerk. Upon request, the Bonner Springs City Clerk will mail the complaint form. **Such complaints must be filed within 180 calendar days after the date the discrimination occurred.**

Notes: Assistance in the preparation of any complaints will be provided to a person or persons upon request and as appropriate. If information is needed in another language, then contact the City Clerk at 913-422-1020.

Complaints should be mailed to or submitted by hand to:

*Bonner Springs Tiblow Transit Public Transportation
Attention: City Clerk
P. O. Box 38, 200 E. Third Street
Bonner Springs, KS 66012*

2. Referral to Review Officer

Upon receipt of the complaint, the City Clerk of the City of Bonner Springs Tiblow Transit Public Transportation shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. If necessary, the Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the agency received the complaint. If more time is required, the City Clerk *shall* notify the Complainant of the estimated timeframe to complete the review. Upon completion of the review, the staff review officer(s) shall make a recommendation about the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to Bonner Springs Tiblow Transit Public Transportation processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to the City Manager for concurrence. If the City Manager concurs, he or she shall issue the City of Bonner Springs Tiblow Transit Public Transportation's written response to the Complainant. This final report should include a summary of the investigation, all findings with recommendations, corrective measures where appropriate.

Note: Upon receipt of a complaint, Bonner Springs Tiblow Transit public transportation shall forward a copy of this complaint and the written response to the appropriate KDOT and FTA Region 7 contacts.

3. Request for Reconsideration

If the Complainant disagrees with the City Manager's response, he or she may request reconsideration submitted in written form to the City Manager within 10 calendar days after receipt of the City Manager's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels **were** not fully understood by the City Manager. The City Manager will notify the Complainant of his or her decision in written form either to accept or reject the request for reconsideration within 10 calendar days. In cases where the City Manager agrees to reconsider, the matter shall be returned to the staff review officer(s) to reevaluate in accordance with Paragraph 2 above.

4. Appeal

If the City Manager denies the request for reconsideration, the Complainant may appeal the City Manager's response with submission of a written appeal to City of Bonner Springs Governing Body no later than 10 calendar days after receipt of the City Manager's written decision to reject reconsideration. The Governing Body of the City of Bonner Springs will then make a determination to either request re-evaluation by the staff review officer(s) or forward the complaint to KDOT for further investigation.

5. Submission of Complaint to the State of Kansas Department of Transportation.

If the Complainant is dissatisfied with the City of Bonner Springs Governing Body's resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Kansas Department of Transportation for further investigation.

KDOT Office of Contract Compliance Eisenhower State Office
Building 700 Southwest Harrison 3rd Floor West
Topeka, KS 66603

Bonner Springs Tiblow Transit Title VI / ADA Complementary Paratransit Complaint Form

Title VI Complaint Form

The purpose of this form is to assist you in filing a complaint with the Tiblow Transit. You are not required to use this form; a letter containing the same information will be sufficient.

For questions about Tiblow Transit Americans with Disabilities Act (ADA) complaint procedures or complaint form contact the Bonner Springs City Clerk, ADA Compliance Officer, 913-422-1020 or cbake@bonnersprings.org

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/>	
Age				
<input type="checkbox"/> Disability	<input type="checkbox"/> Other (specify) _____			
Date of Alleged Discrimination (Month, Day, Year): _____				
Time of Day: _____				
Location: _____				
<i>(Continued on next page)</i>				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional pages.				

Witness(es): YES NO

List Witness(es): *(Attach a separate sheet, if necessary)*

(1) Name:

Phone Number: ()

(2) Name:

Phone Number: ()

(3) Name:

Phone Number: ()

(4) Name:

Phone Number: ()

(Continued on next page)

Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes

No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____

State Court _____

State Agency _____

Local Agency _____

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

Name:

Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below:

Signature _____

Date _____

Please submit this form in person at the address below, or mail this form to:

City of Bonner Springs
 Attn: City Clerk/ Title VI Coordinator
 200 E. Third St.
 P.O. Box 38
 Bonner Springs, KS 66012

INTERNAL USE ONLY

To be completed by Title VI Compliance Officer

Accepted for formal Investigation ____/____/____

Referred to another department on ____/____/____

Rejected ____/____/____

Reason for Rejection:

City Clerk, Title VI Compliance Officer

Date

List of Title VI Investigations, Lawsuits and Complaints – There are no issues to report.

	Date Submitted/Filed Month, Day, Year	Allegation Summary (Include Basis of complaint: race, color or national origin)	Status	Resolution or Action Taken
Investigations				
1				
2				
Lawsuits				
1				
2				
Complaints				
1				
2				

City of Bonner Springs Tiblow Transit Public Participation Plan Outline

1. Brief description of provider's activities and services

The City of Bonner Springs Tiblow Transit Public Transportation provided general public transportation to its resident for more than 35 years. We provide Medical, Nutritional, Social, Recreation and Personal rides within the City of Bonner Springs and in Western Wyandotte County.

2. Brief description of activities that would warrant public participation (i.e. fare changes, changes to service hours, route adjustments, service area changes).

The City of Bonner Springs Tiblow Transit Public Transportation will notify the public for any fare changes, service hour changes, fixed route adjustment and policy or procedure changes.

3. Brief description of the proactive public participation strategies would be used.

All public notifications would be planned as follows:

- *Public hearings/meetings/workshops to be held at convenient times and accessible locations.*
- *Various advertisements will be made and will utilize the Wyandotte Echo, the City website www.bonnerrsprings.org, Senior Center newsletter and post notices at all City public buildings.*
- *Maintain a database of contacts to include interested members of the public, elected officials, local government staff, KDOT Public transit staff and local media).*
- *Post news flashes on the City's website.*

4. Brief description of outreach methods to engage minority and Limited English Proficiency (LEP) individuals (i.e. translation of public meeting materials, providing translation services if requested, targeted media messages in low income neighborhoods of service area, Work with existing neighborhood and advocacy organizations).

The intent of this section is to describe the specific outreach methods that the agency will utilize in order to meaningfully engage minorities and LEP individuals when needed in the public participation process. This section should closely coordinate with the Language Assistance Plan developed in the LEP Plan.

5. Brief description of the desired outcomes of the agency's public participation efforts.

- *The agency desires to have actively engaged riders, staff and members of the general public in the decision process.*
- *The agency strives to give adequate public notice of public participation activities and allow proper time for public review and comment at key decision points.*
- *The agency desires to provide timely information about transportation issues and processes to transit riders, staff and members of the general public.*
- *The agency will provide responses to all public input as appropriate.*
- *The agency will facilitate effective communication among a diverse group of the general public and staff.*
- *The agency will establish a timetable for review of the Public Participation Process to ensure it provides full and open access to all.*

6. Brief summary of recent outreach efforts over the past three years.

We do not now have current outreach efforts other than monthly newsletters, advertisement in the Wyandotte Echo and website information. We will offer annual satisfaction surveys to our riders that request them and act upon the concerns shown in the survey responses.

City of Bonner Springs Tiblow Transit Public Transportation

Limited English Proficiency Plan

Using the above information collected, develop a plan to provide necessary assistance to LEP persons.

Identified LEP individuals

We do not have a specific population groups that meets the criteria of more than 5% and more than 50 individuals. We rely on online language translation apps to help with communication and family members assist with communication.

Language Assistance Measures

We can use online translation tools, Braille services, sign language interpreters and can contact the Language departments at the University of Kansas to assist with any language barriers we would encounter. Our Police Department also has resources that we can use for interpreter assistance.

Dispatch Staff

The dispatcher will communicate with the interpreter to schedule the rides. The drivers will communicate as possible with the riders during the route.

Provide Notice

The LEP Plan will be posted on the agency's website, www.bonnerrsprings.org and to any person or agency that requests a copy. The person to contact about the LEP Plan is the City Clerk who can be reached by phone at (913) 667-1716.

Monitor and Update the LEP Plan

The City of Bonner Springs Tiblow Transit Public Transportation will update the plan per to the Title VI update schedule, which is every three years. We will update the plan any time we determine the changes in the demographics of our agency is significant as it relates to LEP persons.

Language Assistance Plan Limited English Proficiency Plan (LEP) Preview

The purpose of developing an LEP, as a recipient of federal funds, is to identify the extent of LEP individuals and identify ways that the transit agency can reduce or eliminate barriers to LEP individuals,

Four Factor Analysis

- 1. Identify the number of or proportion of LEP individuals that can utilize the service provided by the City of Bonner Springs Tiblow Transit Public Transportation.** Using the 2020 American Community Survey data, we do not have a language group that fits the criteria of more than 5% of total population and more than 50 persons who "speak English less than very well". We do serve some individuals in this category; in these cases, we rely on online interpretation apps to assist us with communication and schedule rides for those individuals.
- 2. Identify the frequency in which LEP individuals come in contact with the service.** We identified one language group that currently qualifies as a LEP group and we serve this language group on a daily basis.
- 3. Identify the importance of the service to the LEP community.** We provide transportation for medical, nutritional and personal reasons to the general public within Western Wyandotte County and Bonner Springs. We use online interpretation apps and many times children of the rider to communicate and schedule rides for individuals who speak English less than very well.

4. **Identify the resources available and the respective costs of these resources.** Currently, the interpreters are either an employee or a family member of the individuals who speak English less than very well, so there is no cost associated with this service.

City of Bonner Springs Tiblow Transit Public Transportation

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Population within Service Area	88.1%	9.6%	11.2%	0.2%	1.6%	2.7%
Agency Board of Directors (Elected City Council is the Board for the Tiblow Transit Public Transportation)	100%	0%	0%	0%	0%	0%
Tiblow Transit Agency Staff	100%	0%	0%	0%	0%	0%