

Betty Jean Kerr Peoples Health Centers

**Title VI Program Subrecipient Plan
Non-Discrimination in the Federal Transit Program**

**Date Approved by: Betty Jean Kerr Peoples Health Centers
5/19/2025**

Table of Contents

A. Title VI Assurances	2
B. Agency Information	3
C. Notice to the Public.....	5
D. Procedure for Filing a Title VI Complaint.....	7
E. Monitoring Title VI Complaints, Investigations, Lawsuits <i>and</i> Documenting Evidence of Agency Staff Title VI Training	9
F. Public Engagement Plan.....	11
G. Language Assistance Plan.....	15
Betty Jean Kerr Peoples Health Centers Limited English Proficiency Plan	15
Four Factor Analysis.....	16
Staff LEP Training.....	21
Monitoring and Updating the LEP Plan.....	22
H. Advisory Bodies.....	23
Option A:.....	23
I. Subrecipient Assistance	24
J. Subrecipient Monitoring.....	25
K. Equity Analysis of Facilities.....	26
L. Fixed Route Transit Providers.....	27
M. Attachments.....	28
Attachment 1: Betty Jean Kerr Peoples Health Centers TITLE VI/ADA COMPLAINT FORM	28

A. Title VI Assurances

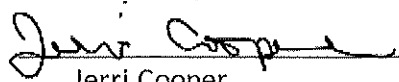
Betty Jean Kerr Peoples Health Centers agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

Betty Jean Kerr Peoples Health Centers 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. Betty Jean Kerr Peoples Health Centers 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.

Betty Jean Kerr Peoples Health Centers meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Betty Jean Kerr Peoples Health Centers and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Signed:



Jerri Cooper

Title:

Director of Compliance and Quality

Date:

6/1/25

B. Agency Information

1. Mission of Betty Jean Kerr Peoples Health Centers

To enhance the quality of life for all residents of the community by providing healthcare that is comprehensive, equitable and trauma informed, including primary care, dental, and behavioral health services that are rooted in compassion, hope, dignity, and cultural competency.

2. History (including year started)

More than 50 years ago (1972), People's Health Clinic later renamed Betty Jean Kerr People's Health Centers was established to address the chronic barriers to quality healthcare experienced by many residents and communities across the St. Louis Metropolitan Region.

Betty Jean Kerr People's Health Centers is an administrative agent for the Missouri Department of Mental Health and is CARF accredited.

3. Regional Profile (regional population; growth projection)

Betty Jean Kerr People's Health Centers currently services children and adults in northern and central parts of the City of St. Louis, MO. The agency currently provides services for:

Primary Care: 38.4% Men/61.6% Women 92% Black/6.5 % White **Total:** 25,815 patients

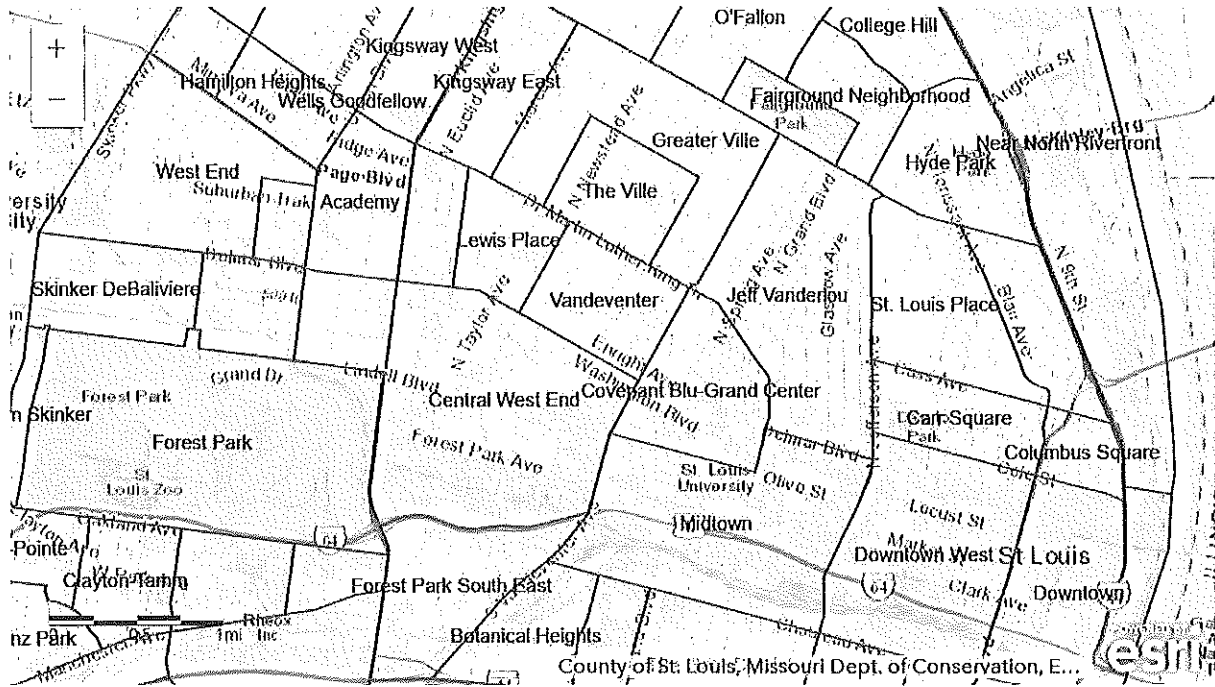
Behavioral Health: 48.1% Men/ 51.9 % Women 89.9 % Black/ 9.2 % White **Total:** 4,686

4. Population served (in relation to regional population)

Relative to the regional population of an agency with equal size, Betty Jean Kerr People's Health Centers services nearly the same portion of consumers as other agencies of its size.

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

The service area of Betty Jean Kerr Peoples Health Centers encompasses North and Central St. Louis City.



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

The current governing body for Betty Jean Kerr Peoples Health Centers includes:

<u>Board Member Name</u>	<u>Board Position</u>	<u>Term</u>
Charles Saulsberry, Esq.	Board Chair	2 years
Gino DiMartino	Vice Chair	2 years
Emily K Barden	Secretary	2 years
Herman Noah	Treasurer	2 years
Rodney L. Malone	Vice Treasurer	2 years

C. Notice to the Public

Notifying the Public of Rights under Title VI

Betty Jean Kerr Peoples Health Centers posts Title VI notices on our agency website: <https://phcenters.org> and in public areas of our agency, in our boardroom, and on our buses and/or paratransit vehicles.

Betty Jean Kerr Peoples Health Centers operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

For more information on the Betty Jean Kerr Peoples Health Centers Title VI program, and the procedures to file a complaint, contact the Title VI Coordinator at (314) 531-1770 ext. 4040; jcooper@phcenters.com; or visit our administrative office at 4236 Lindell Blvd, Suite 200, St. Louis, MO 63108. For more information visit: <https://phcenters.org>

If you believe you have been discriminated against on the basis of race, color, or national origin by Betty Jean Kerr Peoples Health Centers, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact: the Title VI Coordinator at (314) 531-1770 ext.4010.

How to file a Title VI/ADA complaint with Betty Jean Kerr People's Health Centers:

1. **Complaints must be filed in person or in writing.** Complaints should be directed to:

Betty Jean Kerr Peoples Health Centers
Attn: Title VI Coordinator
4236 Lindell Blvd, Suite 200
St. Louis, MO 63108

A complainant may file a complaint directly with Betty Jean Kerr People's Health Center at: www.phcenters.org
Jerri Cooper, Director of Compliance
4236 Lindell Blvd, Suite 200
St. Louis, MO 63108
Phone: (314) 531-1770 ext. 4040

2. In addition to the complaint process at Betty Jean Kerr People's Health Centers, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed, dated, and includes your contact information.

If information is needed in another language, contact (312) 353-2789

This Notice is posted on our agency's website, in public areas of our agency, within transit facilities, and within transit or paratransit vehicles.

D. Procedure for Filing a Title VI Complaint

See Title VI
Complaint Form
ATTACHMENT 1

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Betty Jean Kerr Peoples Health Centers programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by Betty Jean Kerr Peoples Health Centers may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, in public areas of our agency.

You may download the Betty Jean Kerr Peoples Health Centers Title VI Complaint Form at www.phcenters.org or request a copy by writing to Betty Jean Kerr Peoples Health Centers located at 4236 Lindell Blvd, Suite 200. Information on how to file a Title VI complaint may also be obtained by calling Jerri Cooper, Title VI Coordinator at (314)531-1770 ext. 4010

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address, and telephone number.
- Specific, detailed information (how, why, and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Betty Jean Kerr Peoples Health Centers 4236 Lindell Blvd, Suite 200, St. Louis, MO 63108. Information on how to file a Title VI complaint may also be obtained by calling Betty Jean Kerr People's Health Centers at (314) 531-1770 Ext 4040.

COMPLAINT ACCEPTANCE: Betty Jean Kerr Peoples Health Centers will process complaints that are complete. Once a completed Title VI Complaint Form is received, Betty Jean Kerr Peoples Health Centers will review it to determine if Betty Jean Kerr Peoples Health Centers has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Betty Jean Kerr Peoples Health Centers.

INVESTIGATIONS: Betty Jean Kerr Peoples Health Centers will generally complete an investigation within 10 days of receipt of a completed complaint form. If more information is needed to resolve the case, Betty Jean Kerr Peoples Health Centers may contact the complainant. Unless a longer period is specified by Betty Jean Kerr Peoples Health Centers, the complainant will have

ten (10) days from the date of the letter to send requested information to the Betty Jean Kerr Peoples Health Centers investigator assigned to the case.

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

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

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

- A Letter of Finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant disagrees with Betty Jean Kerr Peoples Health Centers' determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. Betty Jean Kerr Peoples Health Centers will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, Betty Jean Kerr Peoples Health Centers will issue a determination letter to the complainant upon completion of the reconsideration review.

-A Determination Letter for cases where reconsideration is granted summarizes the allegations, the original finding, the basis for reconsideration, the final findings, and what remedial action(s) are necessary disciplinary action, additional training of the staff member, or other action will occur.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, East Building, 5th Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

Betty Jean Kerr Peoples Health Centers will notify the Missouri Department of Transportation of all Discrimination complaints within **72 hours** by contacting the MoDOT Title VI Coordinator via the External Civil Rights main line at (573) 526-2978; or via e-mail at TitleVI@modot.mo.gov.

If information is needed in another language, contact Front Office Assistant at (312) 353-2789.

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

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked on Betty Jean Kerr Peoples Health Centers complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

During the reporting period, Betty Jean Kerr Peoples Health Centers had 0 Title VI Complaints.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF
None	None	None	None	None	None	None	None	None

Documenting Evidence of Agency Staff Title VI Training

Betty Jean Kerr Peoples Health Centers staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties? **Yes**
2. Do new employees receive this information via employee orientation? **Yes**
3. Is Title VI information provided to all employees? **Yes**
4. Is Title VI information prominently displayed in the agency and on any program, materials distributed, as necessary? **Displayed on Vehicles/Facilities**

The following Title VI training will be provided to Betty Jean Kerr Peoples Health Center staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and Betty Jean Kerr Peoples Health Centers obligations under Title VI.
2. Information regarding displayed Title VI information and program materials such as the Title VI Nondiscrimination Notice to the Public.
3. Information on Betty Jean Kerr Peoples Health Centers Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on Betty Jean Kerr Peoples Health Centers's outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

Betty Jean Kerr Peoples Health Centers will identify staff that are likely to routinely encounter or have frequent contact with members of the public and/or customers, as well as their supervisors and all management staff. Betty Jean Kerr Peoples Health Centers will include the Title VI training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their Title VI responsibilities on an annual basis.

The Title VI training will be administered in conjunction with training on Betty Jean Kerr Peoples Health Centers Language Assistance Plan and a summary of the agency's LEP responsibilities as discussed in the later Section G. "Language Assistance Plan."

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin Betty Jean Kerr Peoples Health Centers public participation activities.

Objectives

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

Identification of Stakeholders

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

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

- Employers
- Partner agencies

Elements of the Public Engagement Plan

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

Elements of the Public Engagement Plan include:

- 1. Public Notice**
 - a. Official notification of intent to provide opportunities for members of the public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.
- 2. Public Engagement Process/Outreach Efforts:**
 - a. Public meetings: During our food drives staff provide information about resources and opportunities
 - b. Open houses: Open houses are held to let the public know about our programs.
 - c. Rider Forums
 - d. Rider outreach-at schools, churches
 - e. Public hearings
 - f. Focus groups: staff reach out to various focus groups to discuss in a two way communication, including seeking input from groups.
 - g. Surveys
 - h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at *St. Louis Public City Schools, St. Louis City Public Library, churches, and other non-profit locations* easily accessible to public transit and compliant with the Americans with Disabilities Act.

- 3. Public Comment**
 - a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
 - b. Comments are accepted through the following various means
 - i. Dedicated email address at, bhcomplaints@phcenters.com
 - ii. Website at. <https://phcenters.org>
 - iii. Regular mail at *4236 Lindell Blvd, Suite 200, Saint Louis MO 63108*
 - iv. Forms using survey tools for compilation such as
 - v. Videotaping which is submitted to
 - vi. Phone calls to Customer Service Center at *314 531-1770 Ext 4040*

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available report is compiled, including all individual comments.

Title VI Outreach Best Practices

Betty Jean Kerr Peoples Health Centers ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The Betty Jean Kerr Peoples Health Centers Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, Betty Jean Kerr Peoples Health Centers provides the following:

- a. Public notices published in non-English publications (if available) that serve LEP populations.
- b. Title VI Non-Discrimination Notice to the Public posted at the following locations:
 - a. The agency's website: <https://phcenters.org>
 - b. Public areas of the agency's office(s) break room and lobby
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advanced notice, translators may be provided.

Additional Best Practices Include: The distribution of agency materials and information such as

- a. Advertised public announcements through newspapers, fliers, or radio stations.
- b. Partnering with local agencies and community-based organizations such as *St. Louis Public Schools, Urban League, Veterans Hospital, Homeless Shelters, Churches, Vision for Children at Risk, Department of Senior Services*, to advertise services provided,
- c. Added public content to agency's webpage to communicate schedule changes and/or outreach activities at: <https://phcenters.org>
- d. Public Content added to agency's social media to communicate schedule changes and/or outreach activities: <https://phcenters.org>
- e. Hosting an information booth at community events: *Back to School Health Fair*
- f. Comment Forms
- g. Use of community liaisons

2024-2026 Title VI Program Public Engagement Process

Betty Jean Kerr Peoples Health Centers will conduct a Public Engagement Process for the 2024-2026 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Betty Jean Kerr Peoples Health Centers will provide briefings to the Board of Directors and Advisory Bodies.

Betty Jean Kerr Peoples Health Centers will conduct a 30-day public comment period to provide opportunities for feedback on the 2024-2026 Title VI Program.

Comments are accepted during the public outreach period via:

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

Three-Year Summary of Public Outreach Efforts

Betty Jean Kerr Peoples Health Centers has undertaken the following public outreach efforts within the last three calendar years:

Held Community Collaboration Mental Health Sidewalk Talk Event
Weekly Community Mobile Food Mart
Back to School Health and Wellness Fairs
Trauma Informed Training for St. Louis Public Middle and High School students/Teachers
Provide hygiene kits and mental health resources to the homeless at city Metrolink stations
Provided mobile community mental health screenings

G. Language Assistance Plan

Betty Jean Kerr Peoples Health Centers Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address Betty Jean Kerr Peoples Health Centers responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: Betty Jean Kerr Peoples Health Centers provides services in DMH service area 24 which encompasses North St. Louis City and parts of Central St. Louis City. The catchment area has a population of at least 90 percent identifying as speakers of English only, with 4 percent constituting of non-English speakers or do not speak English well. Betty Jean Kerr Peoples Health Centers provides interpreter services through a contract with the international Institute.

Betty Jean Kerr Peoples Health Centers has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to seek meaningful access to services provided by Betty Jean Kerr Peoples Health Centers. Meaningful access is language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, Betty Jean Kerr Peoples Health Centers undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

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

The “Safe Harbor Provision” stipulates a recipient is to provide written translation of vital documents for each eligible Limited English Proficient (LEP) language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population five years of age and older eligible to be served or likely to be affected or encountered.

The U.S. DOT Language Access Plan defines “vital documents” as “paper or electronic written material that contains information that is critical for accessing a component’s programs, services, benefits, or activities; directly and substantially related to public safety; or required by law.” The FTA Circular 4702.1B specifies the Title VI Notice to the Public, Title VI Complaint Procedures, and Title VI Complaint Form are vital documents.

Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Safe Harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Based on the 2021 5-Year American Community Survey data for Table C16001 for Betty Jean Kerr Peoples Health Centers’s service area consisting of St. Louis City, 251,358 persons or 91% of the total population five years of age and older of 275,980 persons speak only English. A total of *24,622 persons Speak English “less than very well” or Speak English “Less Than Very Well”* of the total population speak English “less than very well” – a definition of Limited English Proficiency.

A total of 2,849 of Spanish persons or 100% of LEP Group 1 of the *Spanish* speaking population speak English “less than very well”, which meets the Safe-Harbor threshold. A total of *1,080 Vietnamese persons or 44% of LEP Group 2 of the Vietnamese speaking population – speak English less than very well”* also meeting the safe harbor threshold.

LEP Population in City Transit's Service Area					
Language Spoken at Home for the Population 5 Years and Over					
Source: 2021: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001					
Population 5 years and over by language spoken at home and ability to speak English	St Louis City	Service Area Sector 1	Service Area Sector 1	Service Area Total	Percentage of Total Population 5 Years and Older
Total Population 5 Years and Over	275,980				100%
Speak Only English	251,358				91%
Total Speak English "less than very well"	24,622				9%
Spanish					
Speak English "less than very well"	2,849				11%
French, Haitian, or Cajun					
Speak English "less than very well"	644				2%
German or other West Germanic languages					
Speak English "less than very well"	22				0%
Russian, Polish, or other Slavic languages					
Speak English "less than very well"	443				1%
Other Indo-European languages					
Speak English "less than very well"	842				3%
Korean					
Speak English "less than very well"	112				0%
Chinese (incl. Mandarin, Cantonese)					
Speak English "less than very well"	679				2%
Vietnamese					
Speak English "less than very well"	1080				4%
Tagalog (inc. Filipino)					

LEP Population in City Transit's Service Area					
Language Spoken at Home for the Population 5 Years and Over					
Source: 2021: ACS 5-Year Estimates Detailed Table, U.S. Census Bureau, Table C16001					
Population 5 years and over by language spoken at home and ability to speak English	St Louis City	Service Area Sector 1	Service Area Sector 1	Service Area Total	Percentage of Total Population 5 Years and Older
Speak English "less than very well"	297				1%
Other Asian & Pacific Island languages					
Speak English "less than very well"	500				2%
Arabic					
Speak English "less than very well"	403				1%
Other and unspecified languages					
Speak English "less than very well"	751				3%

2. Frequency of Contact by LEP Persons with Betty Jean Kerr Peoples Health Centers Services:

The Betty Jean Kerr Peoples Health Center staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP people. To date, Betty Jean Kerr Peoples Health Center has on average 2 percent per month for an interpreter. Betty Jean Kerr averages between 2 and 4 calls per month.

LEP Staff Survey Form	
Betty Jean Kerr Peoples Health Centers is studying the language assistance needs of its riders so that we can better communicate with them if needed.	
<p>1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them? DAILY WEEKLY MONTHLY LESS THAN MONTHLY</p> <p>2. What languages do these passengers speak?</p> <p>3. What languages (other than English) do you understand or speak?</p> <p>4. Would you be willing to serve as a translator when needed?</p>	

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	0
Weekly	0
Monthly	2
Less frequently than monthly	Click or tap here to enter text.

Language Assistance Requests Log

<u>Date</u>	<u>Language Spoken by Individual (If Available)</u>	<u>Name</u>	<u>Phone Number or Email (If Available)</u>	<u>Service(s) Requested</u>	<u>Staff Member Providing Aid</u>	<u>Notes and Follow-Up</u>

3. The importance of programs, activities or services provided by Betty Jean Kerr Peoples Health Centers to LEP persons: Outreach activities, summarized in Betty Jean Kerr Peoples Health Centers Title VI Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries, and other non-profit organizations.

Outside Organization LEP Survey

Organization: Betty Jean Kerr Peoples Health Centers

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to Betty Jean Kerr Peoples Health Centers and overall cost to provide LEP assistance:

Based on our demographic analysis, Betty Jean Kerr Peoples Health Centers has determined that Spanish and Vietnamese LEP Groups within our service area meet the Safe Harbor threshold requiring written translated “vital documents” by language groups.

Betty Jean Kerr Peoples Health Centers complies with the Safe Harbor Provision, as evidence by the following vital documents made available in the Spanish and Vietnamese languages:

1. Title VI Non-Discrimination Notice to the Public
2. Discrimination Complaint Procedures
3. Discrimination Complaint Form

Vital documents will be translated for each eligible LEP language group in Betty Jean Kerr Peoples Health Centers service area that constitutes 5% of the total population or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

If the 5% trigger is reached for a LEP language group that is fewer than 50 persons, Betty Jean Kerr Peoples Health Centers will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of vital written materials, free of cost.

The Safe Harbor Provisions apply to the translation of written documents only, and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable. Translation of other documents, if needed, can be provided orally.

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, qualified interpreters and translators can be provided.

2. Language identification flashcards such as " I Speak" Cards
3. Bilingual Staff (willing and qualified)
4. Taglines on vital documents informing LEP persons of the availability of translation upon request and how to obtain them (translated taglines will be included for the LEP language groups which triggered the Safe Harbor Threshold)
5. Written translations of vital documents (identified via safe harbor provision)
6. One-on-one assistance through outreach efforts.
7. Website information.
8. To the extent feasible, assign bilingual staff for community events and Board of Directors meetings and on the customer service phone lines.
9. Bilingual or multilingual versions of outreach and recruitment activities. [
 - a. Brochures or booklets
 - b. Flyers
 - c. Maps
 - d. Timetables
 - e. Safety and security announcements
 - f. Service change announcements
 - g. Notices in local newspapers in languages other than English, and non-English language radio stations and television stations about the available language assistance services and how to get them.
 - h. Recruitment information
 - i. Notices at community-based organizations

Betty Jean Kerr Peoples Health Centers will provide assistance and direction to LEP persons upon request in a timely manner.

Overall Costs: Projected overall cost for bilingual or multilingual brochures, flyers, etc. is around \$1,000.00

Staff LEP Training

The following training will be provided to Betty Jean Kerr Peoples Health Centers staff:

1. Information on Betty Jean Kerr Peoples Health Centers 's Title VI Procedures and Title VI responsibilities pertaining to their specific duties.
2. Information on Betty Jean Kerr Peoples Health Centers's Language Assistance Plan and LEP Responsibilities.
3. Information on the written and oral language assistance services available, and instructions on how agency staff can access these products and services.

4. Information on how to respond to LEP callers, written communications from LEP persons, how to respond to in-person contact from LEP persons, and how to arrange providing language assistance services.
5. Use of Language Identification Flashcards such as "I Speak" Cards.
6. Documentation of language assistance requests by maintaining a Language Assistance Requests Log

Betty Jean Kerr Peoples Health Centers will identify staff that are likely to routinely encounter or have frequent contact with LEP persons, as well as their supervisors and all management staff in order to target training to appropriate staff. Betty Jean Kerr Peoples Health Centers will include the LEP training as part of the orientation for new employees. Existing employees, especially those who frequently encounter the public and/or customers, will take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons on an annual basis.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of Betty Jean Kerr Peoples Health Centers's Title VI Plan requirement.

Betty Jean Kerr Peoples Health Centers will update the LEP plan as required. The plan will be reviewed and updated on a triennial basis, at minimum, or when it is clear that higher concentrations of LEP individuals are present in the Betty Jean Kerr Peoples Health Centers service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether Betty Jean Kerr Peoples Health Centers's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Betty Jean Kerr Peoples Health Centers has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning Betty Jean Kerr Peoples Health Centers's failure to meet the needs of LEP individual.

H. Advisory Bodies

Option A:

Table Depicting Membership of Non-Elected Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American	Native American	Total
Population Committee	1		16			100%
Access Committee	1		16			100%
Citizens Advisory Council	1		16			100%

Description of efforts made to encourage minority participation on committees:

- Invitations sent out to encourage participation
- Staff members encourage participation
- Outreach to minority groups

I. Subrecipient Assistance

Subrecipient Assistance

Betty Jean Kerr Peoples Health Centers does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

Betty Jean Kerr Peoples Health Centers does not have any subrecipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when Betty Jean Kerr Peoples Health Centers constructs facilities, such as storage facilities, maintenance facilities, or operations centers. The term “facilities” does not include bus shelters, transit stations, or power substations. The equity analysis will be conducted during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

The equity analysis is conducted to determine whether the location of the project will result in a disparate impact on minority communities on the basis of race, color, or national origin. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site.

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

Equity Analysis Guidance
Refer to FTA Title VI Circular 4702.1B Chapter III, section 13.

Demographic data and mapping
Guidance may be obtained from either a Regional Planning Commission or Metropolitan Planning Organization.

L. Fixed Route Transit Providers

Betty Jean Kerr Peoples Health Centers is not a transit provider that operates fixed route service, or transit provider that operates fifty (50) or more fixed route vehicles in peak service and are in an urbanized size area with a population of 200,000 or more.

Thus, the requirements to set system-wide service standards and policies, collect and report demographic data, monitor transit service, and to evaluate service and fare changes, are not applicable to Betty Jean Kerr Peoples Health Centers.

M. Attachments

Attachment 1: Betty Jean Kerr Peoples Health Centers TITLE VI/ADA COMPLAINT FORM

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

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Jerri Cooper
4236 Lindell Blvd, Suite 200
St. Louis, MO 63108
(314) 531-1770 Ext 4040

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home () or Cell ()		Work
() -		() -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
2. Accessible Format of Form Needed? () YES specify: _____ () NO		
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zipcode:
d. Telephone (include area code): Home () or Cell ()		Work
() -		() -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply):		
() Race () Color () National Origin (classes protected by Title VI)		
() Disability (class protected by ADA)		
() Other (please specify)		

TITLE VI COMPLAINT FORM – PAGE 2

8. Date of Alleged Discrimination (Month, Day, Year):
9. Where did the Alleged Discrimination take place?
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>
12. What type of corrective action would you like to see taken?
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed. Name: _____ Title: _____ Agency: _____ Telephone: () _____ - _____ Address: _____ City: _____ State: _____ Zip Code: _____

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

Signature and date is required:

Signature Date

If you completed Questions 4, 5 and 6, your signature and date is required:

Signature Date

If information is needed in another language, contact Jerri Cooper at 4236 Lindell Blvd, Suite 200, St. Louis, MO 63108 or at (314) 531-1770 ext. 4040.