



**Title VI Plan
2025-2028**

Re-Adopted by the Board of Directors: August 25, 2025

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A. Title VI Assurances

Pony Bird, Inc. 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.

Pony Bird, Inc. 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. Pony Bird, Inc. 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.

Pony Bird, Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Pony Bird, Inc. 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: _____

Title: _____

Date: _____

B. Agency Information

1. Mission of Pony Bird, Inc.

Pony Bird's mission is to enrich the lives of individuals with disabilities.

2. History (including year started)

Pony Bird opened its doors in June 1977 to ten children who were non-ambulatory with significant intellectual and physical disabilities and provided warm and enriching home-like environments for individuals requiring 24/7 care.

In June 1980, the Jefferson County Developmental Disabilities Resource Board (JCDDRB) established the non-profit organization, Exceptional Ones, Inc. to provide direct services. In 1991, Exceptional Ones officially merged with Developmental Disability Services, an agency that provided developmental training for adults, and changed its name to Developmental Services of Jefferson County, Inc. In June 2010, the board voted to formally approve changing the name of the not-for-profit agency to NextStep for Life, Inc effective August 1, 2010. Effective July 2017, the JCDDRB and NextStep for Life officially separated into two entities and NextStep established its own Board of Directors.

As of June 30, 2022, Pony Bird, Inc. formally merged with NextStep for Life increasing the number of those we serve to more than 1,100 individuals of all ages with intellectual, physical, developmental, and other disabilities and their families. The name continued to be Pony Bird, Inc. Programs offered include Community Living (Residential), Community Supports (Day Programs), Therapies (Physical, Speech, and Occupational), Medical Supports, Respite, Employment Services, and Family Support & Leisure programs.

Pony Bird only provides transportation to individuals receiving services from our organization. Transportation is provided for medical appointments, community integration and education, community support services, and community outings.

3. Regional Profile (regional population; growth projection)

Pony Bird, Inc. receives requests for services through the Department of Mental Health and Vocational Rehabilitation. Pony Bird provides services to individuals primarily in Jefferson County with a few coming from St. Louis County, St. Louis City, and St. Charles County.

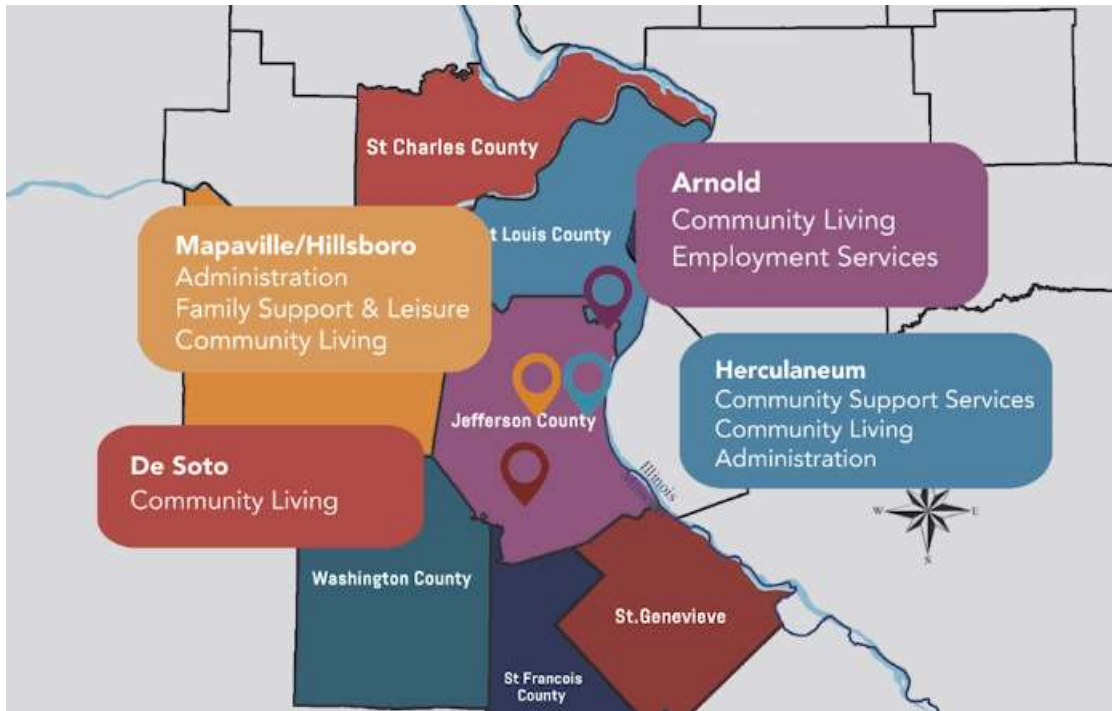
4. Population served (in relation to regional population)

Pony Bird, Inc. serves more than 1,100 individuals of all ages with intellectual, physical, developmental, and other disabilities (as defined by state statute) and their families. These vehicles are dedicated to the individuals served by Pony Bird, Inc. Referrals to services are

made through the Department of Mental Health and Vocational Rehabilitation. Many of the individuals served are classified as low income. Jefferson County is 70% urban and 30% rural.

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

Pony Bird, Inc. only provides transportation to the individuals who receive services at Pony Bird. Individuals are transported to requested or scheduled locations as needed.



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

Pony Bird, Inc. is governed by a volunteer Board of Directors. The bylaws include three-year term limits.

C. Notice to the Public

Notifying the Public of Rights under Title VI

Pony Bird, Inc. posts Title VI notices on our agency's website, in public areas of our agency, and in program handbooks.

Pony Bird, Inc. 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 Pony Bird Inc's Title VI program, and the procedures to file a complaint, contact Pony Bird, Inc. at 636-282-4400; awolf@ponybird.org; or visit our administrative office at 1615 Vine School Rd., Herculaneum, MO 63048. For more information visit www.ponybird.org.

If you believe you have been discriminated against on the basis of race, color, or national origin by Pony Bird, Inc., 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: Andrea Wolf, 636-282-4400 or by email at awolf@ponybird.org.

How to file a Title VI/ADA complaint with Pony Bird Inc:

1. A copy of the Complaint Form and the Complaint Procedures be obtained by requesting a copy from the Title VI Contact Andrea Wolf at 636-282-4400 or by email at awolf@ponybird.org.
2. In addition to the complaint process at Pony Bird, Inc., 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 include your contact information.

If information is needed in another language, contact Andrea Wolf at 636-282-4400, or by email at awolf@ponybird.org.

This Notice is posted on our agency's website, in public areas of our agency, and in program handbooks.

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 Pony Bird Inc.'s programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by Pony Bird, Inc. 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, and within agency handbooks.

Information on how to file a Title VI complaint may be obtained by calling Andrea Wolf at 636-282-4400 or by email at awolf@ponybird.org.

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 Andrea Wolf, 1615 Vine School Rd., Herculaneum, MO 63048.

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

INVESTIGATIONS: Pony Bird, Inc. will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Pony Bird, Inc. may contact the complainant. Unless a longer period is specified by Pony Bird, Inc., the complainant will have ten (10) days from the date of the letter to send requested information to the Pony Bird, Inc. 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 Pony Bird, Inc.'s 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. Pony Bird, Inc. 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, Pony Bird, Inc. 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.

Pony Bird, Inc. 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 Andrea Wolf at 636-282-4400, or by email at awolf@ponybird.org.

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 in Pony Bird Inc.'s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

During the reporting period, Pony Bird, Inc. 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

Documenting Evidence of Agency Staff Title VI Training

Pony Bird Inc.'s staff are given Title VI training, and agency can answer affirmatively to all the following questions:

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

The following Title VI training will be provided to Pony Bird Inc.'s staff:

1. Information on Title VI such as the requirements of Title VI, the protections afforded, and Pony Bird Inc.'s 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 Pony Bird Inc.'s Title VI Complaint Procedures, Title VI Complaint Form, and the complaint investigation process.
4. Information on Pony Bird Inc.'s outreach efforts from the Public Participation Plan and the agency's efforts to engage minority and LEP populations.

Pony Bird, Inc. 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. Pony Bird, Inc. 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 Pony Bird Inc.'s 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 involvement from agency riders and clients, by all identified audiences, in the private participation process for major agency outreach efforts. The Public Engagement plan describes the proactive strategies, procedures, and desired outcomes that underpin Pony Bird Inc.'s private participation activities.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to participation from agency transit riders and clients.
- To provide general notification of meetings and forums for input from agency transit riders and clients, in a manner that is understandable to all populations served.
- To hold meetings for agency transit riders and clients in locations that are accessible to all area stakeholders, including but not limited to minority and low-income populations.
- To provide methods for two-way communication and information and input from agency transit riders and clients 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 the 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 not necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations. The agency's service area does not meet Safe Harbor thresholds.

Elements of the Public Engagement Plan include:

1. Notice

- a. Official notification of intent to provide the opportunity for agency transit riders and clients to participate in engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Engagement Process/Outreach Efforts

- a. Meetings
- b. Open houses
- c. Rider outreach
- d. Focus groups
- e. Surveys
- f. Services for the Disabled (Notices of opportunities for involvement and engagement for agency transit riders and clients include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at Pony Bird, Inc. program facilities or administrative offices, and are easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Comments from Agency Riders or Clients

- a. Comments from Agency Riders or Clients are accepted through the following various means:
 - i. Website at www.ponybird.org.
 - ii. Regular mail at 1615 Vine School Rd., Herculaneum, MO 63048.
 - iii. Phone calls at the Administrative Offices at 636-282-4400.

4. Response to Input from Agency Riders or Clients

All comments from Agency riders or clients are provided to the Board of Directors prior to decision-making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Pony Bird, Inc. ensures all outreach strategies, communications, and involvement efforts comply with Title VI. Pony Bird Inc.'s Public Engagement Plan for its riders and clientele proactively initiates the involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the involvement process. Aligned with the above-referenced communication tactics, Pony Bird, Inc. provides the following:

- a. Title VI Non-Discrimination Notice to the Public posted within the following locations:
 - a. The agency's website: www.ponybird.org
 - b. Public areas of the agency's office(s) such as Pony Bird Inc's program areas.
 - c. Within transit or paratransit vehicles.
- b. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

Additional Best Practices Include:

The distribution of agency materials and information such as brochures, newsletters, employee handbooks, and onboarding materials.

- a. Advertised public announcements through newspapers, fliers, or radio stations.
- b. Added public content to the agency's webpage to communicate schedule changes and/or outreach activities www.ponybird.org/compliance
- c. Hosting an information booth at community events such as job fairs or community partner events.
- d. Comment Forms

2025 – 2028 Title VI Program Public Engagement Process

Pony Bird Inc. will conduct a Public Engagement Process for the 2025-2028 Title VI Program. Engagement is enacted entirely within the agency for both riders and staff. This process includes onboarding, training, and agency updates 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.

Pony Bird Inc. will provide briefings to the Board of Directors and Advisory Bodies.

Pony Bird, Inc. offers an ongoing opportunity for riders and staff to provide feedback on the 2025-2028 Title VI Program.

Comments are accepted at any time via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey

Three-Year Summary of Public Outreach Efforts

Pony Bird, Inc. has undertaken the following public outreach efforts within the last three calendar years:

Public Fundraisers

- March (Annual Great Taste)
- September (Annual Golf Tournament)
- November (Annual Nite at the Races)

March

- Disabilities Awareness Month
- Employment Services Transition Fair

April

- Autism Awareness Month
- Annual Pony Bird Memorial Service

Public Board Meetings: The Board of Directors meets on the 4th Monday of each month 9 times per year (January, February, March, April, May, June, August, September, October, and November).

Civic Clubs: Agency staff and leaders are active in local civic clubs and organizations such as Rotary, Optimist, and numerous Chambers of Commerce in the region.

Trade Associations: Pony Bird leadership is active in our state-level and federal trade associations, Starling and ANCOR. Pony Bird offers a responsive Advocacy Committee which includes and welcomes members of the public to participate in calls to action and trips to Jefferson City to speak with and educate legislators about the significance of disability supports and services.

Open Houses: Annually, throughout the year, Community Living (Residential) and Community Support Services (Day Programs) hosts open houses to welcome members of the public to come and visit where programs occur. This is an effective introduction to Pony Bird programs and staff and also a meaningful way to connect with the recipients of those services.

Social Media: Pony Bird has an active and thriving online presence both on Facebook and Instagram. We remain virtually engaged with the public daily, weekly, monthly and throughout the year.

G. Language Assistance Plan

Pony Bird, Inc Limited English Proficiency Plan

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

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

Service Area Description: Pony Bird, Inc. provides only transportation to individuals participating in Pony Bird programs. Potential clients would reside in the county of Jefferson. Pony Bird serves individuals from St. Charles County, St. Louis County, St. Louis City, and Jefferson County, but all services which require transportation are provided within Jefferson County.

Pony Bird, Inc. 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 Pony Bird, Inc.. 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, Pony Bird, Inc. undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

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

Based on data from the US Census Table B16001+ for Jefferson County, it is unlikely that Pony Bird will encounter persons eligible to be served in our service area. The total number of people according to U.S. Census who speak English “less than very well” across the agency’s service area does not reach the Safe Harbor threshold.

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 2023 5-Year American Community Survey data for Table C16001 for Pony Bird, Inc.’s service area consisting of Jefferson County, 1,215 persons or less than 1% of the total population five years of age and older of 207,445 speak only English. A total of 1,215 of the total population speak English “less than very well” – a definition of Limited English Proficiency.

Of the LEP Language group(s) that speak English “less than very well”, Spanish or Spanish Creole had the highest population at 600 or less than 1%, Serbo-Croatian had the second highest population at 350 or less than 1%, and Vietnamese had the third highest population at 208 or less than 1%. Currently, no LEP language group(s) meet the Safe Harbor threshold. However, efforts will be made to reasonably accommodate any language access requests that arise.

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	Jefferson County			Service Area Total	Percentage of Total Population 5 Years and Older
Total Population 5 Years and Over	207,445			207,445	100.00%
Speak Only English	201,602			201,602	97.2%
Total Speak English “less than very well”	1,215				.005%
Spanish					
Speak English “less than very well”	600			600	.002%
French, Haitian, or Cajun					
Speak English “less than very well”	35			35	.000016%
German or other West Germanic languages					
Speak English “less than very well”	39			39	.000018%
Russian, Polish, or other Slavic languages					
Speak English “less than very well”	59			59	.000028%
Other Indo-European languages					
Speak English “less than very well”	38			38	.000018%
Korean					
Speak English “less than very well”	31			31	.000015%
Chinese (incl. Mandarin, Cantonese)					
Speak English “less than very well”	3			3	.0000014%
Vietnamese					
Speak English “less than very well”	208			208	.001%
Tagalog (inc. Filipino)					

<u>LEP Population in City Transit's Service Area</u>					
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	Jefferson County			Service Area Total	Percentage of Total Population 5 Years and Older
Speak English "less than very well"	118			118	.000057%
Other Asian & Pacific Island languages					
Speak English "less than very well"	0			0	0.00%
Arabic					
Speak English "less than very well"	84			84	.000040%
Other and unspecified languages					
Speak English "less than very well"	0			0	0.00%

2. Frequency of Contact by LEP Persons with Pony Bird, Inc.'s Services:

The Pony Bird, Inc. staff reviewed the frequency with which office staff, dispatchers, and drivers have, or could have, contact with LEP persons. To date, Pony Bird, Inc. has, on average, 0 per month for an interpreter. Pony Bird, Inc. averages 0 phone calls per month.

LEP Staff Survey Form

Pony Bird, Inc. is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?
DAILY WEEKLY MONTHLY **LESS THAN MONTHLY**
2. What languages do these passengers speak? We have not encountered non-English speaking riders.
3. What languages (other than English) do you understand or speak? None
4. Would you be willing to serve as a translator when needed? No.

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	None
Weekly	None
Monthly	None
Less frequently than monthly	None

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 Pony Bird, Inc. to LEP persons:

Outreach activities, summarized in Pony Bird, Inc.'s Title VI Public Engagement Plan, include events such as public meetings at our administrative location, open houses at our program locations, training and onboarding activities, and distribution of agency employee handbooks including Title VI notifications and instructions. The agency has not yet encountered non-English speaking clients. As such, Pony Bird, Inc. cannot speak to the significance of the programs, activities or services to LEP persons. We can, however, speak to the significance of our services for individuals with disabilities.

Outside Organization LEP Survey

Organization: Pony Bird, Inc.

1. What language assistance needs are encountered? **None**
2. What languages are spoken by persons with language assistance needs? **N/A**
3. What language assistance efforts are you undertaking to assist persons with language assistance needs? **None**
4. When necessary, can we use these services? **N/A**

4. The resources available to Pony Bird, Inc. and the overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Phone: 636-282-4400. Upon advanced notice, qualified interpreters and translators can be provided.
2. Language identification flashcards and/or "I speak" Cards available at every service location.
3. Automated translation technology (such as Google Translate)

Based on our demographic analysis (Factor 1) Pony Bird, Inc. has determined that no language group(s) within its service area meet the Safe Harbor threshold requiring written translated "vital documents" by language group(s). Should Factor 1 in the Four Factor analysis indicate in the future that an LEP group reaches the safe harbor threshold, Pony Bird, Inc. will evaluate its vital documents and provide translations.

Pony Bird, Inc. will provide assistance and direction to LEP persons upon request.

Overall Costs:

Pony Bird, Inc. does not yet incur costs associated with translating documents, contracting with language interpreters, producing materials disseminated to the public or clientele in alternate languages, or other language assistance measures. Currently, no staff are associated with providing language assistance and, thus, no cost is incurred.

Staff LEP Training

The following training will be provided for Pony Bird, Inc. staff:

1. Information on Pony Bird, Inc.'s Title VI Procedures and Title VI responsibilities pertaining to their specific duties.
2. Information on Pony Bird Inc.'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 to provide 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

Pony Bird, Inc. will identify staff that are likely to routinely encounter or have frequent contact with LEP people, as well as their supervisors and all management staff in order to target training to appropriate staff. Pony Bird, Inc. 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 Pony Bird, Inc.'s Title VI Plan requirement.

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

H. Advisory Bodies

Pony Bird, Inc. does not have any non-elected committees and councils, the membership of which is selected by the recipient.

I. Subrecipient Assistance

Subrecipient Assistance

Pony Bird, Inc. does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

Pony Bird, Inc. does not have any subrecipients.

K. Equity Analysis of Facilities

A Title VI equity analysis will be completed when Pony Bird, Inc. 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.

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

L. Fixed Route Transit Providers

Pony Bird, Inc. 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 Pony Bird, Inc.

M.Attachments

Attachment 1: Pony Bird, Inc. 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:

Andrea Wolf
Pony Bird, Inc.
1615 Vine School Rd., Herculaneum, MO 63048
awolf@ponybird.org

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)		

continued

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 Andrea Wolf at 1615 Vine School Rd.,
Herculaneum, MO 63048, or at 636-282-4400.