

**JOHNSON COUNTY, KS**  
**TITLE VI PLAN**  
For Non-Transit Services and Operations



APPROVED BY THE JOHNSON COUNTY BOARD OF COUNTY COMMISSIONERS  
ON \_\_\_\_\_

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## **Policy Statement**

**It is the policy of Johnson County, Kansas that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal funds on the basis of race, color, national origin, sex, religion, age, disability, income, or English proficiency, as provided by Title VI of the Civil Rights Act of 1964 and other related federal and state laws, regulations and executive orders. Further, every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.**

## Introduction

The Johnson County Government (JoCo) Title VI Plan is crafted in accordance with 23 CFR 200.9 and 49 CFR 21. Johnson County does not discriminate on the basis of race, color, national origin, sex, religion, age, disability, income or English proficiency in the provision of services.

**This plan applies to all non-transit activities and services provided by Johnson County Government.** Transit Services in Johnson County are provided under contract by the Kansas City Area Transportation Authority (KCATA). Transit services are covered under a separate Title VI plan for Transit Services in Johnson County. The Transit Services Title VI plan is attached to this document.

## AUTHORITIES/GLOSSARY OF TERMS

**Title VI of the 1964 Civil Rights Act** provides that no person in the United States shall, on the grounds 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 (implementation through 23 CFR 200.9 and 49 CFR 21). **Section 162(a) of the Federal-Aid Highway Act of 1973** (Section 324, Title 23 U.S.C.) added the requirement that there be no discrimination on the grounds of sex.

**Section 504 of the Rehabilitation Act of 1973** provides nondiscrimination under Federal grants and programs.

**The Age Discrimination Act of 1975** (Section 6101-6107, Title 42 U.S.C.) prohibits discrimination in Federally Assisted Programs.

**The Civil Rights Restoration Act of 1987, P.L. 100-209**—provides clarification of the original intent of Congress in Title VI of the 1964 Civil Rights Act, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. (Restores the broad, institution-wide scope and coverage of the non-discrimination statutes to include **all** programs and activities of federal-aid recipients, sub-recipients and contractors, whether such programs and activities are federally assisted or not)

**Executive Order 12898** (issued February 11, 1994) addresses Environmental Justice regarding minority and low-income populations.

**Executive Order 13166** (issued August 16, 2000) improves access to services for persons with limited English proficiency.

## DEFINITIONS

**Note: these definitions (except “county manager”) are deemed to be the most relevant excerpts from federal law, and are not intended to be exclusive.**

**“Affirmative Action”** a good faith effort to eliminate past and present discrimination in all federally assisted programs, and to ensure future nondiscriminatory practices.

**“Beneficiary”** any person or group of persons (other than States) entitled to receive benefits directly or indirectly, from any federally assisted program, i.e., relocates, impacted citizens, communities, etc.

**“Citizen Participation”** an open process in which the rights of the community to be informed, to provide comments to the government and to receive a response from the Government are met through a full opportunity to be involved and to express needs and goals.

**“Compliance”** a satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made.

**“Discrimination”** that act or action whether intentional or unintentional, through which a person in the United States, , has been subjected to unequal treatment under any program or activity on the basis of race, color, national origin, sex, religion, age, disability, income or English proficiency.

**“Facility”** includes all or any part of, structures, equipment or other real or personal property, or interests therein, and the provision of facilities includes the construction.

**“Federal Assistance”** includes: Grants and loans of Federal funds; the grant or donation of Federal property and interests in property, the detail of Federal personnel, the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient and Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

**“Limited English Proficiency” (LEP) Individuals** who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English may be considered limited English proficient, or "LEP." These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.

**“Persons”** where designation of persons by race, color, or national origin is required, the following designations ordinarily may be used: “White not of Hispanic origin”, “Black not of Hispanic origin”, “Hispanic”, “Asian or Pacific Islander”, “American Indian or Alaskan Native.” Additional subcategories based on national origin or primary language spoken may be used where appropriate, on either a national or a regional basis.

**“Noncompliance”** a recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort implementing all of the Title VI requirements.

**“Program”** includes any project or activity for the provision of services, financial aid, or other benefits to individuals. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by

the recipient of Federal financial assistance or provided by others through contracts or other arrangements with the recipients.

**“Recipient”** means any State, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision or instrumentality thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal assistance is extended, either directly or through another recipient (sub recipient), for any program. Recipient includes any successor, assignee, or transferee thereof.

**“Review Officer”** A member of the Johnson County Legal Department or such other person designated by the county manager assigned to review a Title VI complaint.

**“Title VI Plan”** the system of requirements developed to implement Title VI of the Civil Rights Act of 1964. References in this part to Title VI requirements and regulations shall not be limited to only Title VI of the Civil Rights Act of 1964. Where appropriate, this term also refers to the civil rights provisions of other Federal related statutes to the extent that they prohibit discrimination on the grounds of race, color, national origin, religion, sex, disability, age, or English proficiency in programs receiving Federal financial assistance.

**“County Manager”** means the county manager or the county manager’s designee.

## **Johnson County Service Overview**

The County is one of 15 Kansas and Missouri counties that comprise the Kansas City Metropolitan Statistical Area (the “KCMSA”). With a 2010 U.S Census population of 544,179, it is the largest county in the state of Kansas. The County encompasses approximately 477 square miles (305,280 acres). Within the County, there are nine townships and 20 incorporated cities, of which eight have populations in excess of 10,000. The County’s largest city, Overland Park, with a 2010 U.S. Census population of 173,372, is located only 12 miles from both downtown Kansas City, Missouri, and Kansas City, Kansas. Approximately one-half of the County’s area is located outside the corporate limits of any city.

Johnson County is a local government organization serving a diverse and expanding population of 570,000 through agencies, departments and offices encompassing everything from aging to zoning. Johnson County Government provides public health and wellness services, codes regulation, law enforcement, correctional services, public infrastructure, and maintenance of official records. In addition to these and other traditional governmental services, the County operates a major intermodal transportation system that includes two airports, an urban busing system, and special transit services that connect with the Kansas City metropolitan region.

Johnson County maintains traffic controls and road improvements throughout the unincorporated areas of the community, provides planning and zoning assistance to commercial and residential developers, provides public transportation services, and conducts local elections with more than 370,000 registered voters.

To support residents and maintain the community’s quality of life, Johnson County Government has assumed some services traditionally associated with cities. These include a unified wastewater district, a stormwater management program, hazardous materials collection, a countywide emergency communications and dispatch system, an emergency medical response service, and an emergency management and homeland security network.

The County’s Criminalistics Laboratory, operated by the Sheriff’s Office, provides research and investigative services countywide and is a partner to law enforcement agencies throughout the metropolitan region. The Sheriff’s Office also operates the Central Booking Center that provides a centralized location within the county where all Johnson County law enforcement agencies bring their arrestees for incarceration.

Johnson County coordinates housing services in cooperation with federal and state regulations, and administers the Community Development Block Grant and Home Investment Partnership program. Johnson County also serves the community’s aging population and needy households with educational, nutrition, and assistance programs.

The County operates developmental supports and mental health agencies serving the entire community. Finally, Johnson County Government operates:

\*Five multi-service centers in the cities of Overland Park, Lenexa, De Soto, Spring Hill, and Gardner;

\* A Central Resource Library in Overland Park and 12 branch libraries in Prairie Village, Roeland Park, Shawnee, Merriam, Lenexa, Leawood, De Soto, Spring Hill, Gardner, Edgerton, and two in Overland Park that are part of the County's nationally recognized library system; and,

\* A national award-winning park and recreation district that owns almost 10,000 acres in 12 developed parks and for development of future parks.

## **Notifying Beneficiaries of Their Rights under Title VI**

Johnson County utilizes the following statement to notify beneficiaries of protection under Title VI and of Johnson County's compliance:

Johnson County does not discriminate on the on the basis of race, color, national origin, sex, religion, age, disability, income or English proficiency in the provision of services. . For more information on Johnson County's non-discrimination policies, or if you believe you have been discriminated against and need to file a complaint, please contact:

Title VI Coordinator at 913.715.0561 or TitleVI@jocogov.org

This notice of Beneficiaries Rights is posted on Johnson County's website under the "Title VI" link, at <http://www.jocogov.org/>

## **Title VI Complaint Procedures**

Johnson County has established Title VI Complaint Procedures, which outline the process for local review and disposition of Title VI complaints. These procedures may be modified, amended or supplemented by the county manager. The local complaint procedures have five steps, which are 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, national origin, religion, sex, age, disability, income, or English proficiency has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity of Johnson County, may file a written complaint with the Title VI Coordinator at the following address:

Title VI Coordinator  
111 S. Cherry St.  
Suite 2300

Olathe, KS 66061-3441  
913.715.0561  
TitleVI@jocogov.org

2. A complaint shall be filed in writing and include the name and address of the complainant, as well as a brief description and date of the alleged violation. Such complaint must be filed within 60 calendar days after the date the person believes the discrimination occurred.

3. Referral to Review Officer: Upon receipt of the complaint, the Title VI Coordinator shall forward the complaint to a Review Officer to evaluate and investigate the complaint. The Review Officer shall complete the investigation no later than 45 calendar days after the date the Coordinator received the complaint. If more time or information is required, the Coordinator shall notify the Complainant of the estimated timeframe for completing the investigation. Upon completion of the investigation, the Review Officer shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress.

Additionally, the Review Officer may recommend improvements to Johnson County's programs and activities relative to Title VI, as appropriate. The Review Officer shall forward his or her recommendations to the Coordinator. The Coordinator shall consider the recommendations of the Review Officer and subsequently issue Johnson County's written response to the Complainant.

4. Request for Reconsideration: If the Complainant disagrees with the Review Officer's response, the complainant may request reconsideration by submitting a written request to the Title VI Coordinator at the above address within 15 calendar days after the mailing date or physical delivery of the Review Officer's written decision. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Review Officer. The Coordinator will notify the Complainant of the decision either to accept or reject the request for reconsideration within 15 calendar days after receipt of the Complainant's request. In cases where the Coordinator agrees to reconsider, the matter shall be sent to a different Review Officer to re-evaluate in accordance with Paragraph 3, above.

5. Appeal: If the request for reconsideration is denied by the Title VI Coordinator, the Complainant may appeal the Title VI Coordinator's denial by submitting a written appeal to the County Manager no later than 15 calendar days after mailing date or physical delivery of the Title VI Coordinator's written decision rejecting reconsideration. The County Manager or designee will review the complaint and render a final decision within 20 calendar days of the receipt of the request for reconsideration. The address for the County Manager is:

Johnson County, Kansas  
Office of the County Manager  
111 S. Cherry St., Suite 3300

Olathe, KS 66061

Or by email: TitleVIappeal@jocogov.org

6. Submission of Complaint to the sponsoring Federal Agency: If the Complainant is dissatisfied with Johnson County's resolution of the complaint; the complainant may also submit a complaint to the Federal Agency associated with the program in question, if applicable. The Complainant may ask the Title VI Coordinator for the contact information of the Federal Agency, if any.

Complainants wishing to submit claims at the state or federal level will be advised of the office, forms and process to submit such claim.

### **Title VI Complaint History**

The Non-Transit Title VI Plan is a new publication without a complaint history.

Johnson County maintains a file where any Title VI complaints, investigations, or lawsuits are recorded and tracked. Files are maintained in each respective department and centrally with the Title VI Coordinator's office, 111 S. Cherry St., Suite 2300, Olathe, KS 66061-3341.

### **Public Participation Plan**

Since Johnson County is a recipient of federal grant dollars, we are required to conduct public participation. This is outlined in 23 CFR 450.210(a) "...The State recipient shall develop and use a documented public involvement process that provides opportunities for public review and comment at key decision points..."

Public participation is an integral part of government service which helps to ensure that decisions are made in consideration of and to benefit public needs and preferences. Early and continuous public involvement brings diverse viewpoints and values into the decision-making process. This process enables agencies to make better informed decisions through collaborative efforts and builds mutual understanding and trust between the agencies and the public they serve. Successful public participation is a continuous process, consisting of a series of activities and actions to both inform the public and stakeholders and to obtain input from them that influence decisions that affect their lives.

Johnson County has developed processes that are specific to the planning and implementation of services which include citizen participation. Involving Johnson County's service recipients as well as the general public in planning and decision-making processes is critical to Johnson County's mission. Generally, Johnson County's public participation methods include but, are not limited to:

- Placing public notices of proposed program changes on the County’s Internet website ([www.jocogov.org](http://www.jocogov.org)) and in physical program areas.
- Placing public notices, and other information in the official county newspaper, minority publications, program brochures, websites, on social media and other public venues for proposed program changes.
- Providing a public comment period for service, fees, or major policy changes where comments can be made by phone, mail, electronic mail, or in person. Public comment is a part of every Board of County Commissioner’s meeting which occurs every Thursday.
- Holding public meetings at times and locations that are accessible to as many Johnson County service recipients as possible, especially those that are most directly affected by the subject of the meeting.
- Depending on the subject, holding meetings at different locations to be more accessible to the primary population to be affected or most interested.
- Utilizing the expertise from regional partners including the Mid-America Regional Council (MARC) and its’ Public Participation Plan, Kansas City Area Transportation Authority (KCATA), as well as local jurisdictions that are impacted by proposed changes, to assist in distributing information to the general public or specific groups to be affected.

### **Engaging Title VI Protected Groups**

Johnson County strives to engage Title VI protected groups in public participation and involvement activities so that their issues are considered in the department’s decision making process. To accomplish this goal, Johnson County will utilize the following public participation strategies, as appropriate:

- Ensure that all communication and public engagement efforts comply with Title VI of the Civil Rights Act and the Johnson County Title VI Plan.
- Coordinate with individuals, institutions, and organizations and implement community-based public involvement strategies to reach Title VI protected populations.
- Utilize local jurisdictions, the business community, community organizations, local media, or other resources to identify the most appropriate engagement methods.
- Provide opportunities for public participation through means other than written communication, such as public meetings, by telephone, email, or social media.

- Use locations, facilities, and meeting times that are convenient and accessible to low-income and minority participants/individuals. This may require holding meetings at different locations and times depending on the subject of the meeting.
- Use different meeting sizes or formats, or vary the type and number of news social media used to announce public participation opportunities, so that communications are tailored to the particular community or population.
- When planning major service or policy changes, collect statistical information to determine the impact to Title VI protected groups and utilize this information to calibrate the distribution of information and methods of engaging the protected groups.
- Include the Title VI public notification statement on Johnson County’s website, on brochures, and other important documents where appropriate.
- Overcome barriers to public participation for individuals with Limited English Proficiency by providing language resources, such as interpreter services.
- Include a statement where interpretation or other communication aids may be provided = on public notices
- Advertise public participation opportunities with media organizations that reach minority and ethnic populations to help ensure representation in the planning process.

**Summary of Recent Outreach Efforts**

See Appendix C for Outreach Efforts

**Limited English Proficiency**

Johnson County is committed to providing quality services to all citizens of Johnson County, including those with Limited English Proficiency (LEP). Title VI requires that recipients of federal financial assistance provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient.

**Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Based on Johnson County’s services, LEP persons interact with the County in the following ways:

- Participating in meetings or accessing services offered by the County or contacting a County office for assistance.
- Contact with Johnson County employees by way of emergency service, law enforcement, surveyors, mental health workers, senior care workers or others who make home/vehicle/personal contacts.
- Accessing Johnson County website at <http://www.jocogov.org/> to obtain information about Johnson County or its services.

According to the most recent American Community Survey (ACS) One-Year estimates (2013) shown in Table 1, approximately 5.7 percent of the population 5 years of age and over in the eligible service area (4 percent in Johnson County) speak English less than very well.

The data shows that Spanish is the most common language spoken at home other than English, at 4.8 percent of the population, other Indo-European languages 2.3%, Asian and Pacific Island languages 2.7%.

Table 1: LEP Population in Areas Served by Johnson County, KS

Spanish	25,528
Other Indo-European Languages	12,303
Asian and Pacific Island languages	14,204
Other Languages	5,053

Source: U.S. Census Bureau

Johnson County will continue to monitor LEP population statistics when new ACS datasets or other sources of information become available.

Johnson County operates a fairly minimal amount of service in areas with large percentages of LEP populations. Johnson County does not believe that LEP persons are underserved due to language barriers. In Johnson County, where Johnson County Government operates the majority of its service, the percentage of individuals that would be affected by a language barrier is minimal.

When LEP persons do access Johnson County services, there are resources to assist them, as described in the Language Assistance Plan

**Factor 2:** The frequency with which LEP persons come in contact with the Johnson County programs.

In addition to the data presented in Table 1, Johnson County staff experience confirms that Spanish is the most commonly-spoken language by LEP persons who access

Johnson County programs. According to Johnson County staff that regularly interact with the public, contact with LEP individuals is infrequent and unpredictable. Due to this infrequent contact, there has not been a demand for multi-language translations or other language assistance measures, except by request.

Through direct communication with the public, employers, contractors and managers of apartment complexes, Johnson County staff periodically communicates with Non-English-speaking individuals that use Johnson County's services.

**Factor 3:** The nature and importance of the program, activity, or service provided by the program to people's lives.

Johnson County provides many services to its residents, from emergency medical to law enforcement and court services, to the treatment of wastewater, we are a full-service community. Residents need and depend on the services provided by the County.

Johnson County currently utilizes the following types of documents to disseminate information on services, to name just a few:

- The County Budget, available on the County Website for viewing and downloading.
- Schedules of Park and Recreation programs for children, youth and adults.
- Schedules for Health Department Clinics for immunizations, health screens, etc.
- The county website, all departments are represented on the website; most documents offered on the website can be translated upon request.

**Factor 4:** The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Due to the relatively low number of LEP individuals in Johnson County, and the low frequency of contact with Johnson County staff, it is not currently warranted to provide full multi-language translations of written materials but rather upon request is deemed appropriate at this time. In addition, budget constraints do not allow Johnson County to provide 100% translation of materials.

However, Johnson County understands the need to provide resources to LEP individuals when the need arises. Therefore, the County utilizes the following resources to provide meaningful access to Limited English Proficient (LEP) Persons:

- Brochures and written documents can be (and have been) made available in Spanish upon request or upon identification of this need in advance of a meeting, service change, or other event.
- Johnson County’s website is able to be translated by Google Translate or Microsoft Translate which can be accessed in the web browser. Johnson County’s website contains schedules, agency contacts, department information and other important information. The front page of the website also has a Language Translation section where a convenient link to the Spanish-translated version of the website is provided.
  - There are 23 languages currently available through this service including Spanish, French, German, Russian, Japanese and Chinese. These translation services are provided at no cost to Johnson County or its customers.
- Johnson County’s Human Services department offers a variety of language assistance services that can be utilized for Johnson County events and materials as needed.
- In public notices, Johnson County Departments state that language assistance services may be made available at public meetings with advance notice.

### **Language Assistance Plan**

Based on the above Four-Factor Analysis, the following Language Assistance Plan outlines measures that Johnson County will implement to ensure that LEP individuals have meaningful access to Johnson County programs and services.

While Johnson County does not currently serve a large number of LEP individuals, some department and agency strategic plans call for expanded services both within Johnson County and in other parts of the Kansas City metropolitan area where the Spanish-speaking population is increasing. Accordingly, the number of LEP persons and the frequency of contact with Johnson County services will continue to be monitored. As services are deployed, staff will continue to evaluate the frequency and nature of contact with LEP individuals.

Methods for identifying LEP individuals who need language assistance:

- Utilize language identification flashcards developed by the U.S. Census Bureau when encountering an LEP individual. These cards are available at County offices and at relevant public meetings.
- Maintain a list of points of contact with LEP individuals.

- Periodically examine customer service records to determine what language assistance requests have been received in the past to determine what assistance may need to be provided in the future.
- Monitor new demographic data as it becomes available to determine the number of LEP individuals in the county and the eligible service area. The American Community Survey annual estimates (provided in One-Year, Three-Year, and Five-Year datasets) will be utilized as appropriate.
- Enact procedures for employees such as drivers, dispatchers, social workers, Sheriff's Deputies, Park and Rec employees and other front-line staff to report instances of contact with LEP individuals.

### **Language Assistance Measures**

Johnson County continues to monitor the needs of LEP customers, evaluate multiple points of feedback, and tailor services accordingly. Below is a sample list with some of the language assistance services that are provided.

- Evaluate the need to produce other documents in Spanish (or other languages), such as strategic plans, service descriptions and applications, Park and Recreation, Museum schedules, Health Department services, department forms etc.
- Continue to provide language translation services on <http://www.jocogov.org>.
- Utilize the language assistance services of Johnson County's Human Services department.
- Provide key outreach materials in other languages, if warranted, on a case-by-case basis.
- Network with local human services organizations that provide services to LEP individuals to assess their needs and utilize their expertise as appropriate.
- On the Johnson County website, state that interpreter services can be made available for a public meeting, with 48 hours' advance notification. This notice should also be included on any public notice to advertise a public meeting or service change.
- Spanish-language outreach materials from other organizations and governments will be reviewed by Johnson County staff to maintain awareness of other entity perspectives.

- When oral interpretation services are needed for a public meeting, Johnson County staff will attempt to access interpretation services from professional or qualified volunteer interpreters.
- In addition to interpretation services, Johnson County will also provide sign language assistance for hearing-impaired individuals at public meetings when requested and available. Closed captioning is also available for broadcasted public meetings.
- Post the completed Title VI Plan, including the LEP Plan on Johnson County's website.

## **Staff Training**

Training staff on the procedures of providing language assistance and how to determine whether and what type of language services a customer needs, is essential to bridging the gap between policies or procedures and actual practices. Training should include how to obtain language assistance services and how to communicate needs to interpreters and translators.

Providing language assistance in some areas may also mean training staff to avoid using acronyms or industry jargon when communicating with LEP individuals. Although the use of an interpreter who is qualified is essential, it does not necessarily mean formal certification as an interpreter is required.

Each department will identify key individuals which may have contact with LEP individuals and train them in language assistance. Some key training issues will include:

- Continue to provide mandatory staff training on the Title VI and LEP policies and procedures specified in this document.
- Train key staff on procedures to follow when encountering LEP individuals and the use of language assistance materials, such as Census language identification flashcards.
- Identify Johnson County staff as well as operations personnel who speak Spanish or other languages; utilize these staff members to communicate with LEP individuals and to assist with language translation activities.

## **Providing Notice to LEP Individuals**

- Post the completed Title VI Plan, including the LEP Plan on the Johnson County website, and at County offices.
- Provide Census language identification flashcards and existing Spanish-language materials at County offices.
- On the Johnson County website, state that interpreter services may be made available for a public meeting, with 48-hour advance notification.
- If a service change is believed to impact a large number of LEP individuals, include a statement in public notices that interpreter services can be made available for a public meeting, with advance notification.

### **Monitoring and Updating the Language Assistance Plan**

Due to changing demographics and customer needs, the implementation measures listed above will be reviewed on a regular basis. At a minimum, Johnson County will update the Language Assistance Plan along with the Title VI Plan every three years as required by one of our federal funders, the U.S. DOT, or as otherwise required. Specific actions for monitoring and updating the plan are as follows:

- Census Bureau data, and specifically the American Community Survey annual estimates, will be thoroughly analyzed to determine the need for additional services for LEP individuals.
- Records of contact with LEP individuals will periodically be assessed to determine future needs.
- Work with MARC and other County partners in the Kansas City region to share LEP best practices and coordinate on providing LEP resources.
- Collect information from community organizations that serve LEP individuals to determine appropriate changes to language assistance materials and procedures.

### **Executive Order 12898 – Environmental Justice**

Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations outline an important consideration for Federal agencies and recipients of Federal funds. Because Johnson County is such a recipient, we are committed to the rule of Environmental Justice in the use of federal funds.

Environmental justice is fair treatment and meaningful involvement of all people with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no population bears a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or from the execution of federal, state, and local laws; regulations; and policies. Meaningful involvement requires effective access to decision makers for all, and the ability in all communities to make informed decisions and take positive actions to produce environmental justice for themselves.

Environmental justice demands that those who have historically been excluded from decision making, traditionally minority, low-income, and tribal communities, have the same access to decision makers, decision-making processes, and the ability to make reasoned contributions to decision-making process as any other individuals.

In our commitment to Environmental Justice, Johnson County will make every attempt to prevent the following in its planning, policy and execution of services:

- Displacement of persons, businesses, farms, or nonprofit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- The denial of, reduction in, or significant delay in the receipt of benefits of County programs, policies, or activities.

### **Membership of Non-Elected Committees and Councils**

Johnson County is governed by the Johnson County Board of County Commissioners (BOCC). The BOCC appoints members of the Johnson County Transportation Council, Mental Health Advisory Board, Park and Recreation Board, Johnson County Developmental Services Board, Library Board and Airport Board. All boards review and make recommendations on the planning, coordinating, and funding for the County's various services in their respective areas. The members help develop awareness of county programs/services and to gain public acceptance, support, and utilization. Diversity is encouraged in all appointments.

### **Board Approval**

The Johnson County Title VI Plan was approved by the Johnson County Board of County Commissioners on \_\_\_\_\_. Documentation of these approvals are provided in Appendix \_\_\_\_\_.

**Johnson County, Kansas  
Title VI Complaint Form**

*Johnson County* is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, sex, religion, age, disability, income, or English proficiency, as provided by Title VI of the Civil Rights Act of 1964 and other related federal and state laws, regulations, and executive orders.. Title VI complaints must be filed within 60 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator by calling 913-715-0561 or by email at TitleVI@jocogov.org

**The completed form must be returned via mail or email or delivery to the Title VI Coordinator, Budget and Financial Planning Department, Suite 2300, Olathe, KS 66061 or TitleVI@jocogov.org**

Your Name:	
Street Address:	
City, State & ZIP Code:	
Phone:	Email:
Person(s) discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State & Zip Code:	

Which of the following best describes the reason the alleged discrimination took place? (Circle one) Date of Incident: \_\_\_\_\_

- Race
- Color
- National Origin (Limited English Proficiency)
- Other



**APPENDIX B – COMPLAINT LOG**

<b>Date</b>	<b>Complainant</b>	<b>Classification</b>	<b>Description</b>	<b>Results</b>
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## Appendix C – Documented Public Engagement Efforts

### Johnson County Corrections Department

- The Corrections Department has hosted multiple groups regarding changes to services and possible impact to the community. Below is a sample of those engagements:
  - Police Academy Johnson County Community College
  - St. Luke's United Methodist Church (Justice Sunday)
  - Clockwinder's Optimist Club of Olathe
  - Reaching out from Within Annual Summit (Preparing for Reentry); Lansing
  - Johnson County NAACP Annual Law Enforcement Forum
  - Eastern Kansas Government Finance Officers Association (EKGFOA)
  - St. Luke's United Methodist Men Retreat/Workshop
  - Johnson County Community College (Community Corrections class)
  - Presentation/Tour
  - Overland Park Rotary
- The Corrections Department has two Advisory Boards and Corrections services and programs are discussed with these Boards. People who serve on these boards are from the community and we discuss Corrections information at each Board meeting.
  - Juvenile Corrections Advisory Board
  - Community Corrections Advisory Board
- The Corrections Department has a Juvenile Detention Alternative's Initiatives Committee that consists of members from the community. This Committee discusses alternatives to placing kids within the Juvenile Detention Center.
- Director at Juvenile Detention Center(JDC) Presentations:
- New client/resident orientation for the kids in JDC
- New staff orientation on corrections practices and Juvenile Detention Alternative's Initiatives(JDAI)
- JDAI Collaborative Committee meets every other month to discuss alternatives to detention initiatives – numerous outside community agencies attend
- Kiwanis civic club
- Director of Field Services:
- Presented a JDAI overview for the Johnson County branch of the NAACP in 2013

Participated in Elder Abuse education – part of educating the community about Elder Fraud in 2014

### **Appendix D – Johnson County Board of County Commissioners Approval**

The Johnson County Board of County Commissioners approved the Title VI Plan on \_\_\_\_\_.