

**Piatt County Public Transportation (Piattran)
Title VI Plan**

Adopted on: 2/13/2013

Adopted by: Piatt County Public Transportation

Revised on: 01/04/2023

This policy is hereby adopted and signed by:

Piatt County Public Transportation (Piattran)

Name/Title: Jami L Trybom,
Transportation Director

Signature:

Policy Statement

The **Piattran** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Illinois Department of Transportation (IDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

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1) Policy Updates – Activity Log

Piattran will review its policy at least once a year to determine if modifications are necessary to ensure compliance with Title VI plan requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
02/13/2013	Initial creation and adoption of Title VI plan.	Transportation Director, Lisa Olsen	Requirement extended to rural providers, based on IDOT requests, created and implemented original plan.
01/28/2016	Updated Plan	Transportation Director, Eileen C. Sierra-Brown	Updated based on templated provided by RLS.
01/15/2017	Update & Added Sections	Transportation Director, Eileen C. Sierra-Brown	News/revised sections included: Public Outreach Plan, Tracking Logs, Revised Report Form
01/02/2018	Updates Based on IDOT Guidance – Added Advisory Group Racial Breakout, added completed outreach log since last submission.	Transportation Director, Eileen C. Sierra-Brown	Advisory group was formed in 2017, meets quarterly, table is contained within the policy.
04/01/2019	Reviewed plan	Transportation Director, Jami L Trybom	No modifications or changes at this time.
01/08/2020	Reviewed Plan	Transportation Direct, Jami L Trybom	Updated based on templates provided by RLS audit
01/07/2021	Reviewed Plan	Transportation Direct, Jami L Trybom	No modifications or changes at this time
01/06/2022	Reviewed Plan	Transportation Direct, Jami L Trybom	No modifications or changes at this time
01/05/2023	Reviewed Plan	Transportation Direct, Jami L Trybom	Few grammatical errors, updated advisory board make-up

2. Purpose of Plan

Piattran has established the following program to comply with the Department of Transportation (DOT) Title VI regulations. Title VI of the Civil Rights Act of 1964, as amended, applies to U.S. Department of Transportation Federal Transit Administration (FTA) sub-recipients. The purpose of Title VI is to ensure that no person in the United States shall, on the grounds of race, color, creed 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 from the FTA. Later statutes extended the scope of Title VI to include prohibitions against discrimination on the basis of age, sex, and disability.

The program referred to herein describes Piattran's efforts to comply with the Title VI regulations issued by the U.S. Department of Justice and the U.S. Department of Transportation. The objectives of the Piattran Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color, national origin, income, age, sex, or disability;
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Ensure the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure that persons with limited English proficiency have meaningful access to programs and activities that are administered by recipients and sub-recipients.

3. Assurance to the FTA

Piattran ensures compliance with the requirements of the Illinois Department of Transportation (IDOT) Title VI Program. Piattran will submit an annual assurance to verify Title VI compliance as part of the standard assurances it submits to IDOT with grant applications. The following page is the Piattran Title VI assurance.

4.

TITLE VI ASSURANCE TO FEDERAL TRANSIT ADMINISTRATION

Piatt County Public Transportation (Piattran) hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of the Title VI of the Civil Rights Act of 1964 and other pertinent directives, to the end and that in accordance with the Act, Regulations, and other pertinent directives, 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 otherwise subjected to discrimination under any program or activity for which Piattran received Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and hereby gives assurance that it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above assurances, Piattran gives the assurances as listed in the "Verification of Level and Quality of Service," with respect to the Federal Transit Administration Grant Program.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by

Beneficiary Notification of Public Rights

In order to comply with 49 CFR Section 21.9 (d), sub-recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

Piatt County Public Transportation (PIATTRAN) Notifying the Public of Rights Under Title VI & ADA

Piattran operates its programs and services without regard to race, color, or national origin, sex, age, or disability in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes they have been aggrieved by an unlawful discretionary practice regarding Piattran programs has the right to file a formal complaint. Any such complaint must be in writing and submitted within sixty (60) days following the date of the alleged occurrence to the Transportation Director at:

Piatt County Public Transportation (Piattran)

1925 N. Market St.

Monticello, IL 61856

director@piattran.org

217-817-0414

www.piattran.org

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights:

Attention: Title VI Program Coordinator,
East Building, 5th Floor-TCR,
1200 New Jersey Ave, SE
Washington, DC, 20590

If information is needed in another language, contact 217-817-0414.

Si se necesita informacion en otro idioma de contacto, 217-817-0414.

List of Locations Title VI Postings

- ✓ **Posted in the kitchen area of 1925 N Market Street, Monticello IL**
- ✓ **Posted on all 14 active fleet vehicles**
- ✓ **Posted on website www.piattran.org**

Additional information requests

Piattran fully understands that IDOT may request additional information to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. Piattran will cooperate with IDOT, and all requested information will be provided in a timely manner.

5. Complaint Procedures, Form, & Record Log

In order to comply with 40 CFR Section 21.9 (b) Piattran has developed procedures for investigating and tracking Title VI complaints. The procedures for filing a complaint will be made available to members of the general public. The following measures will be taken in dealing with Title VI Complaints:

- 1) A formal complaint must be filed within 60 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address, and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Exhibit II provides Piattran's Title VI complaint form.
- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Piattran Executive Director. Under these circumstances, the complainant will be interviewed, and the Executive Director will assist the Complainant in converting the verbal allegation into writing.
- 3) When a completed complaint form is received, the Transportation Director will provide written acknowledgement to the Complainant within 2 business days.
- 4) If a complaint is deemed incomplete additional information will be requested from the Complainant within 7 days from receipt of the original complaint. The Complainant will be provided 14 days to submit the required information (Failure to do so may be considered good cause for a determination of no investigative merit).
- 5) Within 7 days from receipt of a complete complaint, the Transportation Director with advice of the Piatt County State's Attorney will investigate the jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. With complainant's approval, a copy of the complaint may be forwarded to IDOT if assistance is needed for investigating or determining jurisdiction. Within 7 days of this decision, the Complainant and Respondent will receive written notification of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the decision is to be investigated, the notification shall inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
 - c. If Piattran does not have sufficient jurisdiction, shall be forwarded to the IDOT Title VI Coordinator for investigation.
- 6) If the complaint has investigative merit, an investigator will be assigned. A complete investigation will be conducted, and an investigative report will be submitted within 45 days from the receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations.
- 7) A letter of finding will be issued to the Complainant and Respondent. Where appropriate, these letters will include conciliatory measures. A copy of the investigative report shall be forwarded to IDOT within 90 days from recipient of the complaint. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- 8) If the Complainant is dissatisfied with the Piattran resolution of the complaint, he/she has the right to file the complaint directly with the IDOT Title VI Coordinator.

EXHIBIT II

PIATTRAN TITLE VI COMPLAINT FORM

Name: _____

Address: _____

Telephone Numbers: (home) _____ (work) _____

E-Mail Address: _____

Accessible Format Requirements?

Large Print ____ Audio Tape ____ TDD ____ Other _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low-income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In Piattran's complaint investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. The State of Illinois may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf? Yes ____ No ____ *(If you answered 'yes' to this question, go to section III)*

If the answer was 'no' please supply the name of the person for whom you are complaining:

Please explain why you have filed for a third party.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes ____ No ____

Section III

Have you previously filed a Title VI complaint with Piattran or the FTA? Yes ___ No ___

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you ever filed with any of the following agencies?

Transit Provider _____ IDOT _____ Department of Justice _____ Equal Employment
Opportunity Commission _____ Other _____

Have you filed a lawsuit regarding this complaint? Yes ___ No ___

If yes, please provide a copy of the complaint form.

(Note: The above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we will defer to the decision of the court.)

Section IV

What is the basis for the alleged discrimination (e.g., race, color, national origin)? _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route number, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the Illinois Department of Transportation (IDOT)?
Yes ___ No ___

May we release your identity to the IDOT? Yes ___ No ___

(Note: We cannot accept your complaint without a signature)

Signature _____ Date _____

Investigation, Complaint, and Lawsuit Record Keeping Procedures

In order to comply with 49 CFR Section 21.9 (b) Piattran maintains a list of active investigations, lawsuits, or complaints naming Piattran that allege discrimination on the basis of race, color, or national origin. The list includes:

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation;
- The status of the investigation; and
- Actions taken in response to the investigation, lawsuit, or complaint.

Piattran has adopted a specific and accepted Title VI record keeping procedures for complaints, lawsuits, and investigations. Exhibit III on the following page depicts this format. There are currently no active investigations, lawsuits, or complaints that allege discrimination by Piattran on the basis of race, color, or national origin.

List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Piattran** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6. Meaningful Access & Outreach to LEP Persons

Title VI and its implementing regulations require that FTA sub-recipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their program and activities that have Limited English Proficient (LEP) individuals. Circular 4702.1A states that LEP persons are *“persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well, or do not speak English at all.”*

Piattran has assessed the four main factors involved in developing a Language Implementation Plan as described in the Federal Transit Administration guidance entitled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.” These steps are as follows:

- (1) Identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by a program activity, or service of the recipient or grantee. Based on the 2010 U. S. Census, Piattran undertook an analysis of the languages spoken in Piatt County and estimated the number of residents with Limited English Proficiency by language group. The primary language spoken at home within the Piattran service area is English (95.0%) followed by French (1.4%) and Spanish (1.2%). Approximately 5 percent (%) of the residents 5 years of age and older speak a language other than English at home and 0.6 percent (%) of the residents in the service area speak English “less than very well.” Based on the LEP definition, a total of 0.6 percent (%) of the total population in the Piattran Service Area were identified as having Limited English Proficiency.
- (2) Determining the frequency with which LEP individuals come in contact with the program. Piattran has received no ride requests from individuals who had difficulty communicating in English in the past year. Piattran has access to telephone translation service to be able to immediately meet the needs of individuals and is committed to using these resources on a case-by-case basis as the need arises.
- (3) Piattran also provides its various literatures in alternate formats and languages so that all community riders clearly know that Piattran is open to all without discrimination based on race, creed, color, national origin, gender, sexual orientation, or disability. As such, Piattran recognizes and is committed to the importance of access to transportation for all community residents.
- (4) Describing the resources available to the recipient and costs. Piattran has worked diligently to identify common practices for addressing the communication needs of LEP individuals. Based on these studies, Piattran is working with the local social service and medical communities to identify the specific needs of these LEP individuals and to meet those needs. Additionally, Piattran has become a community resource for emergency translation services and associated transportation. Piattran is committed to working with each individual or group as well as their advocates, as appropriate, to determine the best method of communication for our services and in the community. Piattran outreach activities includes:
 - Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
 - Employing different meeting sizes and formats.
 - Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
 - Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
 - Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

The USDOT LEP Guidance identifies 1000 individuals or 5% of the population eligible to be served falling within a specific LEP language group as a threshold above which vital documents should be provided in translation. **Since the Piattran service area does not meet this threshold, a LEP Implementation Plan has not been established.** However, Piattran has determined that the most cost-effective means of delivering competent and accurate language services is to address the need on a case-by-case basis. As such, Piattran will have available summaries of all vital documents translated upon request to suit the needs of each individual or group. In addition, qualified community volunteers may be sought and used when oral translation is needed. Any further requirement will be discussed individually on an as requested basis.

7. Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Piattran** will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The **Piattran** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, **Piattran** reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by **Piattran** are summarized in the table below. Efforts include *meetings, surveys, focus groups, attendance at community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e., posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

Event Date	Piattran Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes
Note table depicted here only is a example, there is an outreach log kept internally, a copy can be provided upon request.					

8. Advisory Group Racial Breakout 2022

Area of Expertise	Organization(s) & Roles	Representative	Gender	Racial Breakdown
Work Transportation	Piatt County Animal Shelter University of Illinois	Leann Topol	Female	Caucasian
Senior Transportation	Maple Point	Stacy Cribbs	Female	Caucasian
	Faith In Action	Leanne Griffin	Female	Caucasian
Low Vision Transportation	Willow Tree Staff Rider	Ruben Ybarra	Male	Hispanic White
Education Transportation	Monticello CUSD#25			
Community / Religious Transportation	Cisco Volunteer Fire Chief Former Pastor Former Piattran Director	Ron Weishaar	Male	Caucasian
Medical Transportation	Kirby Medical Group	Angela Russell	Female	Caucasian
Persons with Disabilities	Developmental Training Piatt County Mental Health Center	Tony Kirkman	Male	Asian