



TITLE VI PLAN

Last Revised: 10/22/2020

I. Purpose of Plan

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.

The program described herein describes GTS'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 GTS's Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color, or national origin.
- 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 denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure that persons with English proficiency have meaningful access to programs and activities that are administered by recipients and sub-recipients.

II. The GTS Title VI Program

GTS has established the following program to comply with the Department of Transportation (DOT) Title VI regulations.

Annual Submissions to Illinois Department of Transportation (IDOT)

GTS ensures compliance with the requirements of the Illinois Department of Transportation (IDOT) Title VI Program. GTS will submit an annual assurance to verify Title VI compliance as part of the standard

assurances it submits to IDOT with grant applications. GTS shall also collect Title VI Assurances from sub-recipients prior to passing through FTA funds. Exhibit I on the following page is GTS's Title VI assurance.

EXHIBIT I: THE GTS TITLE VI ASSURANCE:

Title VI Assurance to Federal Transit Administration

GTS 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 GTS 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, GTS 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 the Department of Transportation under the Federal Transit Administration.

Triennial Submissions to IDOT

GTS will report the information contained in this section to IDOT on a triennial basis with the first submission parceled as part of the plan. The following report addresses each of the eight primary Title VI considerations and the associated forms, policies, and activities of its Title VI program.

1.) Title VI Complaint Procedures

In order to comply with 40 CFR Section 21.9 (b) GTS 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. GTS has adopted the Title VI complaint procedures used by IDOT. The following measures will be taken in dealing with Title VI complaints:

- 1.) A formal complaint must be filed within 180 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, or national origin), 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 GTS'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 GTS's Title VI Coordinator. Under these circumstances, the complainant will be interviewed and the Coordinator will assist the Complainant in converting the verbal allegation into writing.
- 3.) When a complete complaint is received, the Title VI Coordinator will provide written acknowledgement to the Complainant within five (5) days by registered mail. At the same time, the complaint will be forwarded to the IDOT Title VI Coordinator for investigation.
- 4.) If a complaint is deemed incomplete, additional information will be requested from the Complainant within fifteen business days from receipt of the original complaint. The Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

THE GTS 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 GTS'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.

Are you filing this complaint on our 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 GTS 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 _____

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

Section IV

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, 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 _____

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

Signature _____ *Date* _____

5.) Within 15 business days from receipt of a complete complaint, GTS will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Complainant and Respondent will receive notification of the disposition by registered mail.

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.

6.) When GTS does not have sufficient jurisdiction, the complaint will be referred to IDOT for further investigation.

7.) If the complaint has investigative merit, and 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.

8.) 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 60 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.

9.) Of the Complainant is dissatisfied with GTS's resolution of the complaint, he/she has the right to file the complaint with the Grundy County Board, 1320 Union Street, Morris, IL 60450.

2. Title VI Investigation, Complaint, and Lawsuit Record Keeping Procedures

In order to comply with 49 CFR Section 21.9 (b) GTS has prepared and maintains a list of active investigations, lawsuits, or complaints naming GTS 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.

GTS has adopted IDOT's 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 GTS on the basis of race, color, or national origin.

EXHIBIT III. TITLE VI COMPLAINT RECORD KEEPING

File Date	Summary of Allegation	Actions Taken in Response	Status of Investigation

3. Meaningful Access 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.”

GTS 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 Recipient’s 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, GTS undertook an analysis of the languages spoken in Grundy County and estimated the number of residents with Limited English Proficiency. Approximately 6.7 percent (%) of the residents 5 years age and older speak a language other than English at home.
- 2) Determining the frequency with which LEP individuals come in contact with the program. GTS has not received a ride request from any individual who had difficulty communicating in English. GTS, however, employs bi-lingual dispatchers to aide riders in setting up rides if needed.
- 3) Defining the nature and importance of the program, activity, or service provided by the recipient to people’s lives. GTS is open to all without discrimination based on race, creed, color, or national origin. As such, GTS 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. Brochures and other rider literature provide this information. As the need arises, GTS is committed to working with each individual(s) and their advocates, as appropriate, to determine the best method of communication.

Since the USDOT LEP Guidance identifies 1,000 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 GTS service area does meet this threshold, brochures and rider handbooks will be provided to riders in Spanish as well as in English. GTS provides translation and interpretation services free of charge upon request by calling (815) 941-3760.

LEP SERVICE AREA DEMOGRAPHIC CHART

Label	Total		Percent		Percent of specified language speakers							
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	47,367	±73	(x)	(x)	46,356	±228	97.9%	±0.5	1,011	±214	2.1%	±0.5
Speak only English	43,481	±577	91.8%	±1.2	(x)	(x)	(x)	(x)	(x)	(x)	(x)	(x)
Speak a language other than English	3,886	±569	8.2%	±1.2	2,875	±510	74.0%	±5.1	1,011	±214	26.0%	±5.1
Speaks a Language Other Than English												
Spanish	3,066	±478	6.5%	±1.0	2,174	±407	70.9%	±5.6	892	±199	29.1%	±5.6
5 to 17 years old	794	±246	1.7%	±0.5	589	±224	74.2%	±12.5	205	±107	25.8%	±12.5
18 to 64 years old	2,016	±325	4.3%	±0.7	1,453	±250	72.1%	±7.1	563	±179	27.9%	±7.1
65 years old and over	256	±108	0.5%	±0.2	132	±102	51.6%	±26.5	124	±68	48.4%	±26.5
Other Indo-European languages	614	±279	1.3%	±0.6	547	±251	89.1%	±8.7	67	±62	10.9%	±8.7
5 to 17 years old	27	±104	0.2%	±0.2	104	±104	100.0%	±23.0	0	±26	0.0%	±23.0
18 to 64 years old	139	±180	0.9%	±0.4	405	±158	91.2%	±10.7	39	±53	8.8%	±10.7
65 years old and over	0	±50	0.1%	±0.1	38	±32	57.6%	±32.1	28	±32	42.4%	±32.1
Asian and Pacific Island languages	166	±115	0.4%	±0.2	114	±102	68.7%	±28.4	52	±48	31.3%	±28.4
5 to 17 years old	27	±44	0.1%	±0.1	27	±44	100.0%	±52.5	0	±26	0.0%	±52.5
18 to 64 years old	139	±82	0.3%	±0.2	87	±67	62.6%	±28.7	52	±48	37.4%	±28.7
65 years old and over	0	±26	0.0%	±0.1	0	±26	-	**	0	±26	- 0.0%	**
Other languages	40	±45	0.1%	±0.1	40	±45	100.0%	±43.1	0	±26	-	±43.1
5 to 17 years old	0	±26	0.0%	±0.1	0	±26	-	**	0	±26	0.0%	**

18 to 64 years old	36	±45	0.1%	±0.1	36	±45	100.0%	±45.5	0	±26	0.0%	±45.5
65 years old and over	4	±5	0.0%	±0.1	4	±5	100.0%	±100.0	0	±26	0.0%	±100.0
Citizens 18 years and over												
All citizens 18 years old and over	36,996	±221	(x)	(x)	36,365	±247	98.3%	±0.4	631	±150	1.7%	±0.4
Speak only English	34,416	±376	93.0%	±1.1	(x)	(x)	(x)	(x)	(x)	(x)	(x)	(x)
Speak a language other than English	2,580	±413	7.0%	±1.1	1,949	±358	75.5%	±5.0	631	±150	24.5%	±5.0
Spanish	2,051	±344	5.5%	±0.9	1,474	±279	71.9%	±5.4	577	±144	28.1%	±5.4
Other Languages	529	±196	1.4%	±0.5	475	±181	89.8%	±6.8	54	±40	10.2%	±6.8

4. Beneficiary Notification Protection under Title VI

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 the by Title VI. GTS disseminates this information to the public through measures that include posting on the GTS website, and flyers placed at transit offices. The notice will be translated into languages other than English consistent with LEP Guidelines. Exhibit IV is GTS’s Title VI Protection Notice to the Public.

EXHIBIT IV: THE GTS TITLE VI PROECTION NOTICE TO THE PUBLIC

GTS hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally-assisted programs require that no person in the United States of America shall on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits or, or be otherwise subjected to, discrimination under any program or activity receiving Federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discretionary practice regarding GTS's programs has the right to file a formal complaint. Any such complaint must be in writing and submitted to GTS's Title VI Coordinator within sixty (60) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

Director of Transportation

Grundy County Public Transportation

245 N. Rt. 47

Morris, Illinois, 60450

5. Additional information requests

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

6. Submission of Title VI Program

To ensure compliance with 49 CFR Section 21.9 (b), this report will serve as documentation of GTS's Title VI compliance. GTS will prepare and submit updates to the Title VI program to IDOT on a triennial basis.

7. Service Analysis

GTS provides transportation services via demand response. Rider access and travel times vary with each request. A balance of resources is available to meet specific demand at GTS.

Proposed Service and Fare Changes

GTS provides equivalent service to all individuals within their service area without regard to race, color, or national origin. Any time GTS considers modifying its service of fare, the proposed changes will be

assessed to determine whether those changes have a discriminatory impact, and identify alternatives available for people who are affected as appropriate.

The analysis of future proposed changes that will reduce or expand frequency of service or add/eliminate routes will include a comparative analysis of the mapped demographic data for the new service area and the Census tracts where the total minority and low-income populations are greater than the service area average. For proposed changes that would reduce or expand hours and days of service, or would change the fare, GTS will conduct an analysis to determine how minority and low-income riders will be impacted particularly in relation to changes in travel time and cost.

The analysis will describe the actions GTS proposes to minimize, mitigate, or offset any adverse effects of the proposed fare and/or service changes on minority and low-income populations. The analysis will also determine if the proposed changes will have a disproportionately high and adverse impact on minority and low-income riders when compared to the total ridership.

Service Monitoring

The Transportation Manager of GTS will monitor service level and service quality to ensure that no person or group of persons shall be discriminated against with regard to the route, scheduling, or quality of transportation service furnished by the GTS system, on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned, quality of facilities, and location of routes shall not be determined on the basis of race, color, or national origin.

THE GTS ENVIRONMENTAL JUSTICE AND TITLE VI SUMMARY

The VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin. The IDOT and GTS advance Title VI and environmental justice by involving the public in transportation systems, services, and solutions that meet the needs of the public, including minority and low-income communities.

There are three fundamental environmental justice principals. The three principals are:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.