Title VI Program

For:

City of DeKalb

DeKalb Sycamore Area Transportation Study

Voluntary Action Center of DeKalb County

Transdev Services Inc

Adopted:

City of DeKalb: TBD
DeKalb Sycamore Area Transportation Study: TBD
Voluntary Action Center: TBD
Transdev Services Inc: TBD
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Section I. FTA Title VI Program Chapter I: Introduction and Background

ENVIRONMENTAL JUSTICE. Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order 5610.2(a) (“Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) use to incorporate EJ principles into programs, policies, and activities.

The Presidential memorandum accompanying EO 12898 identified Title VI of the Civil Rights Act of 1964 as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.” According to the U.S. Department of Justice, “…the core tenet of environmental justice—that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minority—flows directly from the underlying principle of Title VI itself.”

Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Under DOT’s Title VI regulations, recipients of Federal financial assistance are prohibited from, among other things, using “criteria or methods of administering its program which have the effect of subjecting individuals to discrimination based on their race, color, or national origin.” For example, facially neutral policies or practices that result in discriminatory effects or disparate impacts violate DOT’s Title VI regulations, unless the recipient can show the policies or practices are substantially justified and there is no less discriminatory alternative. In addition, Title VI and DOT regulations prohibit recipients from intentionally discriminating against people on the basis of race, color, and national origin.

The overlap between the statutory obligation placed on Federal agencies under Title VI to ensure nondiscrimination in federally assisted programs administered by State and local entities, and the administrative directive to Federal agencies under the Executive Order to address disproportionate adverse impacts of Federal activities on minority and low-income populations explain why Title VI and environmental justice are often paired. The clear objective of the Executive Order and Presidential memorandum is to ensure that Federal agencies promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice—fair distribution of the adverse impacts of, or burdens associated with, Federal programs, policies, and activities.

Over the years, U.S. DOT has encouraged a proactive approach to the implementation of environmental justice principles in its programs, policies, and activities. This is reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)) which, consistent with E.O. 12898, sets forth a process by which DOT and its Operating Administrations, including FTA, will integrate the goals of environmental

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1 See Title VI Legal Manual, U.S. Department of Justice Civil Rights Division (2001), page 59.
justice into their existing operations to ensure that consideration of EJ principles is an integral part of all programs, policies, and activities, from the inception of the planning process through to project completion, operations, and evaluation.

FTA has developed policy guidance in the form of a Circular (Circular 4703.1), “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” in order to provide recipients with a distinct framework to assist them as they integrate principles of environmental justice into their public transportation decision-making processes. FTA expects the clarification provided by the EJ Circular and the updated Title VI Circular will provide recipients with the guidance they need to properly incorporate both Title VI and environmental justice into their public transportation decision-making.

Because of the connection between EJ and Title VI, the consideration of EJ principles has sometimes been confused with the requirements of Title VI. Here is a summary of the key differences between the two:

**Table 1. Title VI vs Environmental Justice Principles**

<table>
<thead>
<tr>
<th>Key Aspects of the Authorities</th>
<th>Title VI</th>
<th>Environmental Justice</th>
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<tr>
<td>What is the basis for the authority?</td>
<td>Title VI is a Federal statute and provides that no person 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.</td>
<td>The basis for addressing environmental justice is an Executive Order: EO 12898 directs each Federal agency to “make achieving environmental justice part of its mission.” The EO is intended to improve the internal management of the executive branch and not to create legal rights enforceable by a party against the U.S.</td>
</tr>
<tr>
<td>What is the purpose of the authority?</td>
<td>Title VI prohibits recipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance.</td>
<td>EO 12898 calls on each Federal agency to achieve &quot;environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations....&quot;</td>
</tr>
<tr>
<td>To whom does the authority apply?</td>
<td>Title VI is a Federal law that applies to recipients and subrecipients of Federal financial assistance (e.g., States, local governments, transit providers), and not to DOT itself.</td>
<td>EO 12898 applies to Federal agency actions, including DOT’s and FTA’s actions. Title VI is one of the tools used by Federal agencies to implement this directive.</td>
</tr>
<tr>
<td>What does the authority require, and of whom?</td>
<td>Under Title VI, DOT has the responsibility to provide oversight of recipients and to ensure their compliance with Title VI, to ensure that recipients do not use DOT funds</td>
<td>EO 12898 is a directive from the President of the United States to Federal agencies intended to improve the internal management of the Federal government. DOT issued its own Order implementing EO 12898,</td>
</tr>
<tr>
<td>Key Aspects of the Authorities</td>
<td>Title VI</td>
<td>Environmental Justice</td>
</tr>
<tr>
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</tr>
<tr>
<td>to subsidize discrimination based on race, color, or national origin.</td>
<td>and updated the Order in May 2012 (Order 5610.2(a)).</td>
<td></td>
</tr>
</tbody>
</table>

**What does the authority say with regard to negative effects or impacts?**

In accordance with 49 CFR part 21 and Title VI case law, if an otherwise facially neutral program, policy, or activity will have a discriminatory impact on minority populations, that program, policy, or activity may only be carried out if (1) the recipient can demonstrate a substantial legitimate justification for the program, policy, or activity; (2) there are no comparably effective alternative practices that would result in less-disparate impacts; and (3) the justification for the program, policy or activity is not a pretext for discrimination.

In accordance with EO 12898 and the DOT Order on EJ, if a DOT program, policy, or activity will have a disproportionately high and adverse effect on minority or low-income populations, that program, policy, or activity may only be carried out if further mitigation measures or alternatives that would reduce the disproportionately high and adverse effects are not practicable. In determining whether a mitigation measure or an alternative is “practicable,” the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account.

**Does the authority create any rights or remedies?**

Title VI allows persons alleging discrimination based on race, color, or national origin by recipients of Federal funds to file administrative complaints with the Federal departments and agencies that provide financial assistance. Persons alleging intentional discrimination (i.e., disparate treatment) may bring a court action seeking to enforce Title VI but cannot do so with regard to allegations of discrimination based on agency disparate impact regulations. Disparate impact claims may be filed with the Federal agency.

EO 12898 establishes the Executive Branch policy on environmental justice; it is not enforceable in court and does not create any rights or remedies.

Thus, while Title VI is one tool for agencies to use to achieve the principles of environmental justice, it is important to recognize that Title VI imposes statutory and regulatory requirements that are broader in scope than environmental justice. Recipients are cautioned that while there may be overlap, engaging in an EJ analysis under Federal transportation planning and NEPA provisions will not satisfy Title VI requirements, as outlined in this Title VI Circular. Similarly, a Title VI analysis will not necessarily satisfy environmental justice, given that Title VI does not include low-income populations. Moreover, Title VI applies to all activities of Federal recipients, not solely those which may have disproportionately high and adverse human health or environmental effects on EJ populations.
For example, while a bus rehabilitation project may not impose disproportionately high or adverse health or environmental effects on minority or low-income populations, the use of those buses subsequent to the rehabilitation may be subject to a Title VI analysis to ensure that vehicles assigned to a particular area do not result in a disparate impact on the basis of race, color, or national origin. In addition, if there are substantive changes to the service levels for which the rehabilitated or other buses will be used, i.e., the vehicles are deployed in such a way that the nature and quantity of service in a particular area is changed, then a service equity analysis must be conducted to determine whether this change results in a disparate impact on the basis of race, color, or national origin. The requirements for that particular analysis are part of the compliance determinations made for Federal transit recipients under chapter IV of this Circular.
Section II. FTA Title VI Program Chapter III: City of DeKalb Title VI Program

REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the City of DeKalb (heretofore known as “applicant”/“recipient”) will carry out the program in compliance with DOT’s Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA. Primary recipients shall collect Title VI assurances from subrecipients prior to passing through FTA funds. The text of FTA’s annual certifications and assurances is available on FTA’s website.

REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

Title 49 CFR Section 21.9(b) requires recipients to “keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].” FTA requires that all direct and primary recipients document their compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program. FTA will review and concur or request the recipient provide additional information.

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such Programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. Operational differences between the primary recipient and subrecipient may require, in some instances, that the subrecipient tailor its language assistance plan. Subrecipients shall develop and submit to the primary recipient a list of complaints, investigations, or lawsuits. Subrecipients that have transit-related non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees. Subrecipients must submit all the above information to the primary recipient on a schedule requested by the primary recipient. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.

a. Contents. Every Title VI Program shall include the following information:
A copy of the recipient’s Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.

See Appendix A: TITLE VI SIGNAGE for examples of the signage installed in the offices and on the buses. See Appendix E: Spanish Language Documents for examples of the signage translated into Spanish. Spanish language signs are also installed in the offices and on the buses.

A copy of the recipient’s instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

See Appendix C: Title VI Complaints and Appendix D: City of DeKalb Title VI Complaint Form. See Appendix E: Spanish Language Documents for the Spanish translation of the complaint form.

A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.

Neither the City of DeKalb nor its subrecipients, Voluntary Action Center of DeKalb County, or Transdev Services Inc, has had any Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.

A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient’s targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The City of DeKalb and its public transit providers, the Voluntary Action Center of DeKalb County, and Transdev Services Inc, use the DeKalb Sycamore Area Transportation Study (DSATS) Public Participation Plan (PPP) as their policy guide for public transportation outreach. Chapter 4, Section XII outlines the guidelines for Title VI and Environmental Justice Outreach.

A copy of the recipient’s plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

The plan for providing language assistance to persons with limited English proficiency is included in Section III. Limited English Proficiency Policy Statement and Available Resources.

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.
The City of DeKalb maintains no transit-related, non-elected planning boards, advisory councils or committees. As the City contracts with the Voluntary Action Center (VAC) of DeKalb County, and Transdev Services Inc, to provide transit services for the DeKalb urbanized area, it relies on the VAC governing board as the transit-related committee of record. The following committees and boards deal with transit issues:

- **DSATS MPO Policy Committee**: This is the policy setting committee of the DeKalb MPO. While this is not an elected committee, the member organizations head (i.e. mayor, county exec, president) serves as the representative for the organization.

- **DSATS MPO Technical Advisory Committee**: This committee provides the technical expertise in transportation issues. It is made up of the engineering staffs of the member organizations, along with the representatives from educational and transit organizations.

- **DSATS Transit Subcommittee**: This committee reviews plans and projects submitted by the City of DeKalb as it coordinates public transit in the DeKalb region. The Transit Subcommittee provides recommendations to the Policy Committee. It is made up of various staff of the member organizations, along with representatives from educational and transit organizations.

- **VAC Board of Directors**: While the City of DeKalb provides funding for public transit, it is the Voluntary Action Center that provides public transit to all of DeKalb County, which includes the City of DeKalb and the surrounding Metropolitan Area. This Board consists of members of the community throughout DeKalb County and is the only official Board which deals with transit related issues. The VAC Bylaws state:

  "A Board of Directors, consisting of not more than 21 members representing various segments of the socioeconomic, cultural and geographic community, shall establish policy, plan programs, promote good public relations, and work to secure necessary operating funds for the Voluntary Action Center."

- **City of DeKalb Human Relations Committee**: As the City of DeKalb contracts with vendors to provide public transportation, the VAC Board of Directors acts as the main transit related committee. If there were an issue to arise where a transit issue was brought before the City of DeKalb, the Human Relations Committee would be the most likely committee to deal with the issue. The Human Relations Committee Regulations state:

  49.03 MEMBERSHIP AND OFFICERS.

  a) Commissioners. The Human Relations Commission shall have between Five (5) and Nine (9) Commissioners, who shall be referred to and known as the Human Relations Commissioners, and who shall be appointed by the Mayor with the advice and consent of the City Council for terms of three (3) years.
Commission members may be reappointed at the discretion of the Mayor with the advice and consent of the City Council. Commissioners shall receive no salary, but may be compensated for expenses incurred in the performance of Commission's duties. The Mayor shall make appointments to the Human Relations Commission which reflect a broad diversity of background within the community in the areas of race, creed, color, gender, religion, age, national origin or ancestry, physical or mental disability, marital status, matriculation, or sexual orientation. For purposes of determining a quorum of the Commission, calculations shall be based upon the then-currently appointed and serving members of the Commission.

See Error! Reference source not found. for policies on inclusiveness on City of DeKalb Boards and Commissions.

Table 2. DeKalb Area Transit Related Boards and Committees

<table>
<thead>
<tr>
<th>DeKalb Area Body</th>
<th>Caucasian</th>
<th>Hispanic/Latino</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
</tr>
</thead>
<tbody>
<tr>
<td>DSATS Policy Committee</td>
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<td>0%</td>
<td>0%</td>
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<td>0%</td>
</tr>
<tr>
<td>DSATS Technical Advisory Committee</td>
<td>100%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>DSATS Transit Subcommittee</td>
<td>100%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>VAC Board of Directors</td>
<td>94.1%</td>
<td>0%</td>
<td>5.9%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>City of DeKalb Human Relations Committee</td>
<td>50%</td>
<td>0%</td>
<td>50%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

(6) Primary recipients shall include a narrative or description of efforts the primary recipient uses to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.

Subrecipient oversight is addressed under heading Subrecipient Title VI Oversight of this section.

(7) If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

There has been no facility construction since the last Title VI plan update. The City of DeKalb, DeKalb County, Transdev Services Inc, and the Voluntary Action Center are working together towards the construction of a new facility and should it move...
forward to the planning stage in the next three years, a Title VI equity analysis shall be performed.

(8) Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

- The State of Illinois oversees VAC’s rural paratransit service and is only limitedly covered in this document.

- All of Transdev Services Inc bus routes are fixed route services.

- This document is the official Title VI Plan for both the City of DeKalb and DSATS.

b. Upload Title VI Program to TrAMS. Direct and primary recipients must upload their Title VI Program into FTA’s Transit Award Management System (TrAMS), or other tracking system as directed by FTA. The Title VI Program shall be attached via the paper clip function on the Civil Rights screen, and not attached to a particular grant. Recipients must also notify their FTA Regional Civil Rights Officer via email that they have uploaded their Title VI Program to TrAMS. The Title VI Program must be uploaded to TrAMS no fewer than sixty calendar days prior to the date of expiration of the Title VI Program.

The City of DeKalb shall upload its Title VI Program information to TrAMS as required.

c. Determinations. The status of a direct or primary recipient’s Title VI Program will be noted in TrAMS. The three status determinations are:

(1) Concur. This status indicates that the recipients’ Title VI Program meets the requirements as set out in this Circular. The recipient may receive grant funds.

(2) In review. This status indicates that the recipient’s Title VI Program is being reviewed by FTA staff and a determination as to sufficiency has not yet been made. “In review” status is only effective for sixty days and grants may be processed while a Title VI Program has an “in review” status.

(3) Expired/Expiration. This status indicates that the recipients’ Title VI Program has expired and that an updated Title VI Program must be submitted. A recipient with an expired Title VI Program may have its draw-down privileges suspended and grants may not be processed.

d. Reporting Requirement Exemptions. Recipients whose only FTA funding is through FTA’s University Transportation Center Program, National Research and Technology Program, Transportation Cooperative Research Program, Over the Road Bus Accessibility program, or the Public Transportation on Indian Reservations program are exempt from submitting a Title VI Program to FTA. In addition, FTA may exempt a recipient, upon receipt of a request for a waiver submitted to the Director of the Office of Civil Rights, from the requirement to submit a Title VI Program, or from some elements of the Title VI Program. The absence of the requirement to submit a Title VI Program does not obviate the underlying obligations to comply with DOT’s Title VI regulations. Furthermore, with the exception of the Public Transportation on Indian
Reservation program, FTA may, at any time, request information from an exempt recipient in order to determine compliance with Title VI regulations and statutes.

*The City of DeKalb must report as this section is not applicable.*

REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

### a. Contents

The Title VI notice shall include:

1. A statement that the agency operates programs without regard to race, color, or national origin.

   *See Appendix B: TITLE VI POLICY AND COMPLAINT PROCEDURES: City of DeKalb Illinois Title VI Statement of Policy.*

2. A description of the procedures that members of the public should follow in order to request additional information on the recipient’s Title VI obligations.

   *See Appendix A: TITLE VI SIGNAGE and Appendix B: TITLE VI POLICY AND COMPLAINT PROCEDURES.*

3. A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.

   *See Appendix B: TITLE VI POLICY AND COMPLAINT PROCEDURES.*

### b. Effective Practices for Fulfilling the Notification Requirement.

1. **Dissemination.** Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient’s discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT’s Title VI regulations with regard to the recipient’s program.

   *The City of DeKalb shall use the following methods to promote their Title VI program:*

   - **Office signs are located in high public traffic locations in the City of DeKalb office building, the Transdev Services Inc facility, and the Voluntary Action Center facility.**

   - **We shall request DeKalb County, the City of Sycamore, and the Town of Cortland to locate an office sign in a high traffic area of their offices.**
• **Ads shall appear on the City of DeKalb television Channel 14.**

• **Title VI Notification signs are installed on all VAC and Transdev Services Inc Buses** (see Appendix A: TITLE VI SIGNAGE).

(2) **Document translation.** Notices detailing a recipient’s Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient’s language assistance plan.

*The Title VI Office and Bus signs, Title VI Complaint Procedures, and Title VI Complaint Forms are available and posted in Spanish. See Appendix E. for Spanish translation documents.*

(3) **Subrecipients.** In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the primary recipient; however, subrecipients shall notify passengers and other interested persons that they may file discrimination complaints directly with the subrecipient.

*Our subrecipients, the Voluntary Action Center (VAC) DeKalb County, which provides all the paratransit transit for both the City of DeKalb and DeKalb County, and Transdev Services Inc provides all fixed route public transit for the City of DeKalb. All Title VI policies and documents include contact information for either the City of DeKalb, Transdev Services Inc, or VAC. Both staffs are trained to handle Title VI information requests and complaints and the Title VI Policy document identifies who shall be the lead investigator for any complaints.*

**REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient’s website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT’s Title VI regulations. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI complaint investigation and tracking procedures and complaint form developed by the primary recipient. Sample complaint procedure and complaint forms are located in Appendices C and D.

*See Appendix B: TITLE VI POLICY AND COMPLAINT PROCEDURES for Title VI complaint procedures and Appendix D for complaint forms.*

**REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation,
lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

The City of DeKalb shall maintain a listing of all investigations as described above. The list shall include all investigations conducted by both the City of DeKalb, Transdev Services Inc, and the Voluntary Action Center of DeKalb County.

PROMOTING INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient’s established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient’s public participation activities). Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient’s decision-making process. FTA has developed a Circular, 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” that includes many examples of effective strategies for engaging minority and low-income populations. FTA encourages recipients to review that Circular for ideas when developing their public engagement strategy. Some of those effective practices include:

a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.

b. Employing different meeting sizes and formats.

c. 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.

d. 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.

e. 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.

Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service). FTA/FHWA (Federal Highway
Administration) joint planning regulations (23 CFR part 450) require States and MPOs engaged in planning activities to seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons, who may face challenges accessing employment and other services, as States and MPOs develop and conduct their public involvement activities. Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations, and develop and use a documented public participation plan or process that provides adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

The City of DeKalb and its public transit providers, the Voluntary Action Center of DeKalb County, Transdev Services Inc, serve the entire DSATS region and beyond. The City of DeKalb oversees the use of all public transit funding for the DSATS region. The City of DeKalb is the fiscal agent for all FTA 5307 funds. City of DeKalb Transit staff has been put in charge of managing all the FTA grants. In order to avoid duplication of services, the DeKalb Sycamore Area Transportation Study (DSATS) Public Participation Plan (PPP) has been developed as the public participation plan for both Highway and Urbanized Area Transit funding (5307 mainly). The main public participation guidelines for transit are highlighted in:

- Chapter 4, Section I.6 identifies requirements of Title VI Public Participation requirements.
- Chapter 4, Section VI identifies requirements for public participation in transit related issues.
- Chapter 4, Section XII outlines the guidelines for Title VI and Environmental Justice Outreach

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS

Consistent with Title VI of the Civil Rights Act of 1964, DOT’s implementing regulations, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). This Circular contains only a summary of the LEP requirements as they apply to FTA recipients; recipients are encouraged to review DOT’s LEP guidance for additional information (70 FR 74087, Dec. 14, 2005) http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/pdf/05-23972.pdf. Recipients are also encouraged to review DOJ’s guidelines on self-assessment, Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs (May 2011), as well as other materials, available at www.lep.gov.

See the Heading Subrecipient Title VI Oversight in this section.
Subrecipient Title VI Oversight

As the designated recipient of federal funding for public transit in the DeKalb urbanized area, the City of DeKalb is required to develop a Title VI program and ensure that any subrecipients also develop their own Title VI plan, which shall be approved and overseen by the City.

The City of DeKalb contracts with the Voluntary Action Center of DeKalb County (VAC) to provide paratransit services for residents living and working in the DeKalb urbanized area. The City of DeKalb also contracts with Transdev Services Inc that provides all fixed route public transit services in the DeKalb urbanized area. In addition, DeKalb County contracts with VAC to provide paratransit services to residents in the remaining areas of DeKalb County outside the DeKalb urbanized area. In order to ensure compliance with all Title VI regulations for both the recipient and the subrecipients, the following oversight policies are observed:

1. VAC and Transdev Services Inc shall either adopt their own Title VI plan and submit it to the City of DeKalb to be reviewed by the City and submitted to the FTA for approval or adopt the City of DeKalb’s plan as their own plan. The DeKalb-Sycamore Area Transportation Study (DSATS) MPO shall also adopt the City Title VI plan.

2. When performing public outreach, the City of DeKalb, Transdev Services Inc, and the Voluntary Action Center shall use the DSATS MPO Public Participation Plan as the guideline to implement public outreach.

3. VAC and Transdev Services Inc shall serve as voting members on the DSATS Technical Advisory Committee and report to the member organizations on projects, changes, and other significant issues affecting transit in the region.

4. The City of DeKalb, Transdev Services Inc, and VAC staffs shall share with each other all Title VI complaints about public transit in the DeKalb region. Both staffs shall agree upon any remedies and/or responses before submitting results to complainant.

5. Any substantive changes to the provision of public transit by VAC and/or Transdev Services Inc shall be:

6. Reviewed by City of DeKalb staff to identify potential impacts to minority and disadvantaged population in the DeKalb Urbanized Area.

7. Public outreach to affected populations shall be implemented according to policies set forth in the DSATS PPP.

8. Changes should be reviewed and approved by the DSATS Transit Subcommittee, Technical Advisory Committee and Policy Committee before implementation.
MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

- As the City of DeKalb does not provide public transit directly, it does not maintain any transit related sub-committees.
- The DeKalb Sycamore Area Transportation Study (DSATS) approves all highway and transit projects and programs, and therefore reviews DeKalb metropolitan area transit plans and projects. There are currently no minorities serving on these boards.
- The VAC Board of Directors oversees all transit provided by VAC.

PROVIDING ASSISTANCE TO SUBRECIPIENTS

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” See Appendix L for clarification of reporting responsibilities by recipient category. Primary recipients should assist their subrecipients in complying with DOT’s Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient. Primary recipients should provide the following information to subrecipients; such information, forms, and data may be kept in a central repository and available for all subrecipients:

a. Sample notices to the public informing beneficiaries of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint, and the recipient’s Title VI complaint form.

b. Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.

c. Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.

d. Any other recipient-generated or obtained data, such as travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI.
The responsibilities of both the City of DeKalb, Transdev Services Inc, and the Voluntary Action Center are combined together into this document and both organizations are subject to all rules and policies identified herein.

MONITORING SUBRECIPIENTS

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

a. In order to ensure the primary and subrecipient are in compliance with Title VI requirements, the primary recipient shall undertake the following activities:

   (1) Document its process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.

   The Voluntary Action Center is the sole paratransit transit provider for the City of DeKalb. Transdev Services Inc is the sole fixed route transit provider for the City of DeKalb. Transdev Services Inc and VAC shall adopt the City’s Title VI plan as their own plan and must report all Title VI complaints that occur within the DeKalb Metropolitan Area to the City of DeKalb.

   (2) Collect Title VI Programs from subrecipients and review programs for compliance. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.

   The City of DeKalb, Transdev Services Inc, and VAC have agreed to maintain the same Title VI program.

   (3) At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by the primary recipient, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis. Subrecipients that are fixed route transit providers are responsible for reporting as outlined in Chapter IV of this Circular.

   City staff provides the planning services for public transit to ensure that transit is being provided on an equitable basis. It is policy that any changes to public transit in the DeKalb region be proposed by the City and reviewed and approved by the DSATS Transit Subcommittee and the DSATS Technical Advisory Committee (TAC) and approved by the DSATS Policy Committee.

b. When a subrecipient is also a direct recipient of FTA funds, that is, applies for funds directly from FTA in addition to receiving funds from a primary recipient, the subrecipient/direct recipient reports directly to FTA and the primary recipient/designated recipient is not responsible for monitoring compliance of that subrecipient. The supplemental agreement signed by both entities in their roles as designated recipient and direct recipient relieves the
primary recipient/designated recipient of this oversight responsibility. See Appendix L for clarification of reporting responsibilities by recipient category.

VAC and Transdev Services Inc are not direct recipients of FTA funds.

DETERMINATION OF SITE OR LOCATION OF FACILITIES

Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:

a. The recipient shall complete a Title VI equity analysis 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. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

b. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

c. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

No new facilities have been built during the last three (3) years. The City of DeKalb, DeKalb County, and the Voluntary Action Center are currently developing plans for a new transit facility. As plans progress, all three agencies have agreed to work together to ensure all Title VI requirements identified herein and within all Federal and State of Illinois laws not identified herein shall be followed.
REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST

FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT’s Title VI regulations.

The City of DeKalb, Transdev Services Inc, and the Voluntary Action Center shall retain all records and information required by the FTA to investigate any complaints of discrimination or to resolve concerns about possible noncompliance issues.

FTA MASTER AGREEMENT SECTION 12. CIVIL RIGHTS.
The City of DeKalb (heretofore known as “Recipient”) agrees to comply with all applicable civil rights laws and implementing regulations including, but not limited to, the following:

a. Nondiscrimination in Federal Public Transportation Programs. The Recipient agrees to comply, and assures the compliance of each third party contractor at any tier and each subrecipient at any tier of the Project, with the provisions of 49 U.S.C. § 5332, which prohibit discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity.

b. Nondiscrimination – Title VI of the Civil Rights Act. The Recipient agrees to comply, and assures the compliance of each third party contractor at any tier and each subrecipient at any tier of the Project, 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. §§ 2000d 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 C.F.R. Part 21. Except to the extent FTA determines otherwise in writing, the Recipient also agrees to comply with any applicable implementing Federal directives that may be issued.

c. Equal Employment Opportunity. The Recipient agrees to comply, and assures the compliance of each third party contractor at any tier of the Project and each subrecipient at any tier of the Project, with all equal employment opportunity (EEO) provisions of 49 U.S.C. § 5332, with Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, and implementing Federal regulations and any subsequent amendments thereto. Except to the extent FTA determines otherwise in writing, the Recipient also agrees to comply with any applicable Federal EEO directives that may be issued.

Accordingly:

(1) General. The Recipient agrees as follows:

(a) The Recipient agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, sex, disability, age, or national origin. The Recipient agrees to take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, creed, sex, disability, age, or national origin. Such action shall include, but not be limited to, employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.
(b) If the Recipient is required to submit and obtain Federal Government approval of its EEO program, that EEO program approved by the Federal Government is incorporated by reference and made part of the Grant Agreement or Cooperative Agreement for the Project. Failure by the Recipient to carry out the terms of that EEO program shall be treated as a violation of the Grant Agreement or Cooperative Agreement. Upon notification to the Recipient of its failure to carry out the approved EEO program, the Federal Government may impose such remedies as it considers appropriate, including termination of Federal assistance in accordance with Section 11 of this Master Agreement, or other measures that may affect the Recipient’s eligibility to obtain future Federal assistance for transportation Projects.


d. Disadvantaged Business Enterprise. To the extent authorized by Federal law, the Recipient agrees to facilitate participation by DBEs in the Project and assures that each third party contractor at any tier of the Project and each subrecipient at any tier of the Project will facilitate participation by DBEs in the Project to the extent applicable. Therefore:


(2) The Recipient agrees and assures that it shall not discriminate on the basis of race, color, sex, or national origin in the award and performance of any third party contract, or subagreement supported with Federal assistance derived from U.S. DOT in the administration of its DBE program and will comply with the requirements of 49 C.F.R. Part 26. The Recipient agrees to take all necessary and reasonable steps set forth in 49 C.F.R. Part 26 to ensure nondiscrimination in the award and administration of all third party contracts and subagreements supported with Federal assistance derived from U.S. DOT. As required by 49 C.F.R. Part 26 and approved by U.S. DOT, the Recipient’s DBE program, if any, is incorporated by reference and made part of the Grant Agreement or Cooperative Agreement for the Project. The Recipient agrees that implementation of this DBE program is a legal obligation, and that failure to carry out that DBE program shall be treated as a violation of the Grant Agreement or Cooperative Agreement for the Project and the Master Agreement. Upon notification by U.S. DOT to the Recipient of its failure to implement its approved DBE program, U.S. DOT may impose sanctions as provided for under 49 C.F.R. Part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. § 1001, and/or the Program Fraud Civil Remedies Act, 31 U.S.C. §§ 3801 et seq.
e. **Nondiscrimination on the Basis of Sex.** The Recipient agrees to comply with all applicable requirements of Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq., and with implementing Federal regulations that prohibit discrimination on the basis of sex that may be applicable.

f. **Nondiscrimination on the Basis of Age.** The Recipient agrees to comply with all applicable requirements of the Age Discrimination Act of 1975, as amended, 42 U.S.C. §§ 6101 et seq., and with implementing regulations, which prohibit employment and other discrimination against individuals on the basis of age.

g. **Access for Individuals with Disabilities.** The Recipient agrees to comply with 49 U.S.C. § 5301(d), which states the Federal policy that elderly individuals and individuals with disabilities have the same right as other individuals to use public transportation services and facilities, and that special efforts shall be made in planning and designing those services and facilities to implement transportation accessibility rights for elderly individuals and individuals with disabilities. The Recipient also agrees to comply with all applicable provisions of section 504 of the Rehabilitation Act of 1973, as amended, with 29 U.S.C. § 794, which prohibits discrimination on the basis of disability; with the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. §§ 12101 et seq., which requires that accessible facilities and services be made available to individuals with disabilities; and with the Architectural Barriers Act of 1968, as amended, 42 U.S.C. §§ 4151 et seq., which requires that buildings and public accommodations be accessible to individuals with disabilities. In addition, the Recipient agrees to comply with applicable Federal regulations and directives and any subsequent amendments thereto, except to the extent the Federal Government determines otherwise in writing, as follows:

1. U.S. DOT regulations, "Transportation Services for Individuals with Disabilities (ADA)," 49 C.F.R. Part 37;


(8) U.S. Federal Communications Commission regulations, "Telecommunications Relay Services and Related Customer Premises Equipment for the Hearing and Speech Disabled," 47 C.F.R. Part 64, Subpart F; and

(9) U.S. ATBCB regulations, “Electronic and Information Technology Accessibility Standards,” 36 C.F.R. Part 1194;

(10) FTA regulations, "Transportation for Elderly and Handicapped Persons," 49 C.F.R. Part 609; and

(11) Federal civil rights and nondiscrimination directives implementing the foregoing regulations.

h. Drug or Alcohol Abuse-Confidentiality and Other Civil Rights Protections. To the extent applicable, the Recipient agrees to comply with the confidentiality and other civil rights protections of the Drug Abuse Office and Treatment Act of 1972, as amended, 21 U.S.C. §§ 1174 et seq., with the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970, as amended, 42 U.S.C. §§ 4581 et seq., and with the Public Health Service Act of 1912, as amended, 42 U.S.C. §§ 290dd-3 and 290ee-3, and any subsequent amendments to these acts.


k. Other Nondiscrimination Laws. The Recipient agrees to comply with all applicable provisions of other Federal laws, regulations, and directives pertaining to and prohibiting discrimination that are applicable, except to the extent the Federal Government determines otherwise in writing.

__________________________________________  ___________________
Jerry Smith – Mayor, City of DeKalb  Date
DEKALB REGION TITLE VI PROGRAM

SUBRECIPIENT TITLE VI OVERSIGHT

As the designated recipient of federal funding for public transit in the DeKalb urbanized area, the City of DeKalb is required to develop a Title VI program and ensure that any subrecipients also develop their own Title VI plan, which shall be approved and overseen by the City.

The City of DeKalb contracts with the Voluntary Action Center of DeKalb County (VAC) to provide paratransit services for residents living and working in the DeKalb urbanized area. The City of DeKalb also contracts with Transdev Services Inc that provides all fixed route public transit services in the DeKalb urbanized area. In addition, DeKalb County contracts with VAC to provide paratransit services to residents in the remaining areas of DeKalb County outside the DeKalb urbanized area. In order to ensure compliance with all Title VI regulations for both the recipient and the subrecipients, the following oversight policies are observed:

9. VAC and Transdev Services Inc shall either adopt their own Title VI plan and submit it to the City of DeKalb to be reviewed by the City and submitted to the FTA for approval or adopt the City of DeKalb’s plan as their own plan. The DeKalb-Sycamore Area Transportation Study (DSATS) MPO shall also adopt the City Title VI plan.

10. When performing public outreach, the City of DeKalb, Transdev Services Inc, and the Voluntary Action Center shall use the DSATS MPO Public Participation Plan as the guideline to implement public outreach.

11. VAC and Transdev Services Inc shall serve as voting members on the DSATS Technical Advisory Committee and report to the member organizations on projects, changes, and other significant issues affecting transit in the region.

12. The City of DeKalb, Transdev Services Inc, and VAC staffs shall share with each other all Title VI complaints about public transit in the DeKalb region. Both staffs shall agree upon any remedies and/or responses before submitting results to complainant.

13. Any substantive changes to the provision of public transit by VAC and/or Transdev Services Inc shall be:
   a. Reviewed by City of DeKalb staff to identify potential impacts to minority and disadvantaged population in the DeKalb Urbanized Area.
   b. Public outreach to affected populations shall be implemented according to policies set forth in the DSATS PPP.
   c. Changes should be reviewed and approved by the DSATS Transit Subcommittee, Technical Advisory Committee and Policy Committee before implementation.
Section III. Limited English Proficiency Policy Statement and Available Resources

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance. Title VI and its implementing regulations require federal grant recipients to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). To that end, VAC provides translation and interpretation services free of charge upon request by calling (815) 758-3932.

TITLE VI COMPLAINT PROCEDURES

Voluntary Action Center of DeKalb County (VAC)

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under VAC’s programs or related benefits, you may file a complaint with the VAC EEO Officer, Executive Director, 1606 Bethany Rd., Sycamore, IL 60178 or by telephone (815) 758-3932. We encourage you to make your complaint in writing.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The EEO Officer will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigating officer will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, the EEO Officer will complete a final report for the Board of Directors. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial steps. The investigation process and final report should take no longer than twenty-five (25) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the VAC Board of Directors, 1606 Bethany Rd., Sycamore, IL 60178.

Complaints may also be filed with the Federal Transit Administration’s Office of Civil Rights, no later than 180 days after the date of the alleged discrimination:

200 West Adams Street, Suite 320,
Chicago, Illinois 60606
Phone: (312) 353-3770.

The EEO Officer shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by VAC in response to the complaint. Should VAC receive a Title VI complaint in the form of a formal charge or lawsuit, VAC’s attorney shall be responsible for the investigation and maintaining a log as described herein.
Transdev Services Inc

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under Transdev Services Inc’s programs or related benefits, you may file a complaint with the Transdev Services Inc’s EEO Officer, General Manager, 1825 Pleasant St., DeKalb, IL 60115 or by telephone (815) 758-6900. We encourage you to make your complaint in writing.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The EEO Officer will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigating officer will:
- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, the EEO Officer will complete a final report to Transdev Services Inc. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial steps. The investigation process and final report should take no longer than twenty-five (25) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the City of DeKalb, 200 S. Fourth St., DeKalb, IL 60115.

Complaints may also be filed with the Federal Transit Administration’s Office of Civil Rights, no later than 180 days after the date of the alleged discrimination:
200 West Adams Street, Suite 320,
Chicago, Illinois 60606
Phone: (312) 353-3770.

The EEO Officer shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by Transdev Services Inc in response to the complaint. Should Transdev Services Inc receive a Title VI complaint in the form of a formal charge or lawsuit, Transdev Services Inc’s attorney shall be responsible for the investigation and maintaining a log as described herein.

INTRODUCTION
This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of the City of DeKalb, Transdev Services Inc, and the Voluntary Action Center (VAC) of DeKalb County as recipients of federal financial assistance as they relate to the needs of individuals with limited English 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, which states no person shall be subjected to discrimination on the basis of race, color or national origin. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure
that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

**PLAN SUMMARY**

The City of DeKalb is the designated recipient of Federal Transit Administration (FTA) Section 5307 grant funds and contracts with VAC through its TransVAC transportation service to provide origin to destination paratransit service and demand response route services within the DeKalb-Sycamore Urbanized Area of Illinois. VAC also provides rural DeKalb County origin to destination paratransit services on behalf of the Illinois Department of Transportation (IDOT) through FTA Section 5309 grant funds. The City of DeKalb also contracts with Transdev Services Inc for all fixed route public transit services for the DeKalb-Sycamore Urbanized Area. The City of DeKalb, Transdev Services Inc, and VAC have jointly developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by VAC and Transdev Services Inc. 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, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, The City of DeKalb, Transdev Services Inc, and VAC undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a VAC program, activity, or service.
2. The frequency with which LEP persons encounter VAC/Transdev programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by VAC/Transdev to the LEP population.
4. The resources available to VAC/Transdev and overall cost to provide LEP assistance.

A summary of the results of the VAC/Transdev four-factor analysis is in the following section.

**FOUR-FACTOR ANALYSIS**

**Factor 1. Portion of LEP People**

staff reviewed the U.S. Census 2013-2017 ACS Estimates and determined an estimated total of 901 persons in census tracts with their centroid in the DSATS Planning Boundary (.02% of the population) speak a language other than English.
See Table 3 & Table 4 and Figure 2 for population and household breakouts.

**Table 3. Linguistically Isolated Households, No One Age 14 or Over Speaks English Well**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Count</td>
<td>%</td>
<td>Count</td>
<td>%</td>
<td>Count</td>
<td>%</td>
</tr>
<tr>
<td>All Households</td>
<td>41,443</td>
<td>12,888</td>
<td>100.0%</td>
<td>3,871</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish</td>
<td>308</td>
<td>0.7%</td>
<td>191</td>
<td>1.5%</td>
<td>0</td>
</tr>
<tr>
<td>Other Indo-European Languages</td>
<td>101</td>
<td>0.2%</td>
<td>70</td>
<td>0.5%</td>
<td>0</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island Languages</td>
<td>87</td>
<td>0.2%</td>
<td>51</td>
<td>0.4%</td>
<td>0</td>
</tr>
<tr>
<td>Other Languages</td>
<td>55</td>
<td>0.1%</td>
<td>38</td>
<td>0.3%</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: (U.S. Census 2013-2017 ACS Estimates)

**Figure 1. English Speaking Ability by Household within the DSATS Planning Boundary**

The main concentration of LEP residents is focused in the downtown DeKalb region, north of IL-38 and east of SR-23. This area is served by the Transdev Fixed Route 17, which travels along 7th Street. In this area around 30% of the population has limited English proficiency (see Map 1). There is also an area between Annie Glidden and Normal in DeKalb that has a 16-24% concentration of LEP residents. This is mainly Northern Illinois University (NIU) student housing, served by Transdev Services Inc.

**Map 1. Linguistically Isolated Households in DSATS Region**
Table 4. Linguistically Isolated Households in DSATS Region, 2017
# DEKALB REGION TITLE VI PROGRAM

## Table 5. Languages Spoken by Population within the DSATS Planning Boundary by U.S. Census Tracts

<table>
<thead>
<tr>
<th></th>
<th>US Census 2011 - 2015 ACS Estimates For Population 3 Years and Over</th>
<th>DSATS Urbanized Planning Boundary</th>
<th>DSATS Rural Area</th>
<th>City of DeKalb</th>
<th>City of Sycamore</th>
<th>Town of Goodland</th>
<th>DeKalb County</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Population (%)</td>
<td>Population (%)</td>
<td>Population (%)</td>
<td>Population (%)</td>
<td>Population (%)</td>
<td>Population (%)</td>
<td>Population (%)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>10,356</td>
<td>96.0%</td>
<td>96.0%</td>
<td>96.0%</td>
<td>96.0%</td>
<td>96.0%</td>
<td>96.0%</td>
</tr>
<tr>
<td>Spanish</td>
<td>655,711</td>
<td>64.4%</td>
<td>64.4%</td>
<td>64.4%</td>
<td>64.4%</td>
<td>64.4%</td>
<td>64.4%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>3,284</td>
<td>3.1%</td>
<td>3.1%</td>
<td>3.1%</td>
<td>3.1%</td>
<td>3.1%</td>
<td>3.1%</td>
</tr>
<tr>
<td>Italian</td>
<td>76</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>2,178</td>
<td>2.1%</td>
<td>2.1%</td>
<td>2.1%</td>
<td>2.1%</td>
<td>2.1%</td>
<td>2.1%</td>
</tr>
<tr>
<td>Slovenian</td>
<td>9</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Czech</td>
<td>30</td>
<td>0.3%</td>
<td>0.3%</td>
<td>0.3%</td>
<td>0.3%</td>
<td>0.3%</td>
<td>0.3%</td>
</tr>
<tr>
<td>Albanian</td>
<td>0</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other Indo-European</td>
<td>685</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
<td>0.7%</td>
</tr>
<tr>
<td>Other Asian Languages</td>
<td>118</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Other Native American</td>
<td>39</td>
<td>0.4%</td>
<td>0.4%</td>
<td>0.4%</td>
<td>0.4%</td>
<td>0.4%</td>
<td>0.4%</td>
</tr>
<tr>
<td>Other White</td>
<td>22</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
</tr>
<tr>
<td>Other Race</td>
<td>16</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.2%</td>
</tr>
</tbody>
</table>

Source: (U.S. Census 2011-2015 ACS Estimates)
DEKALB REGION TITLE VI PROGRAM

Figure 2. Languages Spoken in DSATS Region
Factor 2. Frequency of Contact

A survey of all VAC and Transdev Services Inc. drivers, dispatchers, and others who have regular contact with the public was updated to assess how much interaction they have with persons who have limited English proficiency skills and to compare with the results of the 2016 survey.

Overall, the 2019 survey update showed the average staff member has moderate interaction with persons with limited English proficiency. VAC staff have had fewer communication issues resulting from limited English proficiency in 2019 than they did in 2016.

Q2. On average, how often do you interact with persons where language skills have been an issue in communicating with them?

<table>
<thead>
<tr>
<th>Response</th>
<th>2016</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Never</td>
<td>25%</td>
<td>12%</td>
</tr>
<tr>
<td>b. A few times a year</td>
<td>63%</td>
<td>42%</td>
</tr>
<tr>
<td>c. Once a month</td>
<td>6%</td>
<td>18%</td>
</tr>
<tr>
<td>d. 2-3 times a month</td>
<td>0%</td>
<td>6%</td>
</tr>
<tr>
<td>e. Once a week</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>f. 2-3 times a week</td>
<td>0%</td>
<td>18%</td>
</tr>
<tr>
<td>g. 4-6 times a week</td>
<td>6%</td>
<td>0%</td>
</tr>
<tr>
<td>h. Every day</td>
<td>0%</td>
<td>3%</td>
</tr>
</tbody>
</table>

Q3. On average, please indicate the type of communication issues you have, by percentage, with those having communication issues. Responses should total to 100%.

<table>
<thead>
<tr>
<th>Response</th>
<th>2016</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Person(s) speaks English but difficult to understand</td>
<td>67%</td>
<td>35%</td>
</tr>
<tr>
<td>b. Person(s) speaks broken English, but attempts to communicate</td>
<td>23%</td>
<td>48%</td>
</tr>
<tr>
<td>c. Person(s) speaks no English, speaks entirely in native language</td>
<td>12%</td>
<td>16%</td>
</tr>
</tbody>
</table>

Factor 3. Nature and Importance of Service Provided

VAC’s mission is to serve the transportation needs of our community both efficiently and courteously with transportation services ranging from public route deviated busses, rides to medical appointments, on demand door to door services, and rides for the elderly and disabled. VAC’s transportation services affect almost every family in our community.

The City of DeKalb, Transdev Services Inc, and the Voluntary Action Center will continue to identify services for those with limited English skills. Known services in the region include:
Table 4. Limited English Proficiency (LEP) Services in the DeKalb Region

<table>
<thead>
<tr>
<th>Program</th>
<th>Phone / Address</th>
<th>Website</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conexion Comunidad</td>
<td>(815) 754-0980 637 N 11th St DeKalb, IL 60115-3509</td>
<td><a href="http://www.conexioncomunidad.org/">http://www.conexioncomunidad.org/</a></td>
<td>The purpose of Conexion Comunidad is to provide connection for services to the Latino(a) community by offering information, education, resources and services.</td>
</tr>
<tr>
<td>Kishwaukee College: English as a Second Language (ESL) courses</td>
<td>(815) 825-2086 x3180; en español, (815) 825-2086 x2240 Kishwaukee College 21193 Malta Road Malta, Illinois 60150</td>
<td><a href="https://www.kishwaueecollege.edu/community-friends-adult-education-transition-programs-adult-education-basic-skills/adult-education">https://www.kishwaueecollege.edu/community-friends-adult-education-transition-programs-adult-education-basic-skills/adult-education</a></td>
<td>The Adult Education and Transition Programs division at Kishwaukee College offers free beginning and intermediate level English as a Second Language (ESL) courses at various times and locations in the DeKalb County area. Childcare is also provided to guardians participating in the program.</td>
</tr>
<tr>
<td>DeKalb School District Programs</td>
<td>(815) 754-2358 901 S. 4th St. De Kalb, IL. 60115</td>
<td><a href="http://www.dist428.org">http://www.dist428.org</a></td>
<td>The DeKalb School District provides: • Bilingual Developmental Programs for Spanish-speaking Preschool through 5th grade; • English as a second language PreK-12th; • Bilingual Core classes (math, science, literacy); • Spanish-speaking Home School Liaisons (This program helps parents communicate with the schools, help connect families with resources within the community, translate when needed and provide instructional support); • Primary Language Tutors (program volunteers speak the 30 other languages served in the area); • Latino Action Group (serves to break down barriers between Spanish-speaking folks and community resources); • Bilingual Parent Advisory Council</td>
</tr>
<tr>
<td>English Language Studies (ELS) - NIU</td>
<td>(815) 753-4600 385 Wirtz Drive DeKalb, IL 60115</td>
<td><a href="http://www.els.edu/en/ELSCenters/Detail?locid=DEK">http://www.els.edu/en/ELSCenters/Detail?locid=DEK</a></td>
<td>Provides English Language Courses and other services to limited english speaking students at Northern Illinois University (NIU)</td>
</tr>
</tbody>
</table>

Factor 4. Cost

VAC assessed the following resources available to VAC for providing language assistance:

1. How much a professional interpreter and translation service would cost on an as needed basis
2. Which VAC documents would be the most valuable to be translated if the need should arise
3. Which organizations VAC could partner with for outreach and translation efforts
4. Amount of staff and vehicle operating training needed

Based on the four-factor analysis, VAC developed its LEP Plan as outlined in the following section.
LIMITED ENGLISH PROFICIENCY (LEP) PLAN OUTLINE

How VAC and Transdev Services Inc and staff may identify an LEP person who needs language assistance:

1. Have Census Bureau Language Identification Flashcards available at VAC meetings. This will assist VAC in identifying language assistance needs for future events and meetings.
2. Have Census Bureau Language Identification Flashcards on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to VAC’s management for follow-up.
3. Vehicle operators and other front-line staff, like dispatchers, have been surveyed on their experience concerning any contacts with LEP persons during the previous year.

LANGUAGE ASSISTANCE MEASURES

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which VAC and Transdev Services Inc staff responds to LEP persons, whether in person, by telephone or in writing.

• VAC and Transdev Services Inc, in conjunction with the City of DeKalb, contracts with LanguageLine Solutions to provide translation services for riders with limited English skills. When a dispatcher or bus driver encounters a person(s) with limited skills, the driver calls Language Line Services. Via the cell phone, Language Line representatives identify the language of the rider and then provides translations between the rider and the driver/dispatcher.
  o Main Phone Line: (800) 752-6096
  o Translation Services Phone Line: (888) 808-9008 (must register with company to use service)
  o Website: http://www.languageline.com
  o Services are provided on an as needed basis. When VAC uses the service, they are billed afterwards. The cost of the program is based on the number of times the service is used. From 7/1/12 to 6/30/13 the total cost of the program was $380.

• Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on VAC programs and services.

• Survey bus drivers and other front-line staff, like dispatchers and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year.

• Provide Language Identification Flashcards at the Transit Center, onboard the VAC fleet, in Road Supervisor vehicles and at transit systems administrative offices.


• Include language “Spanish a plus” on bus driver recruitment flyers and onboard recruitment posters.

STAFF TRAINING

The following training will be provided to VAC staff:

1. Information on the VAC Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests
5. Use of LanguageLine service  
6. How to handle a potential Title VI/LEP complaint

OUTREACH TECHNIQUES
When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

MONITORING AND UPDATING THE LEP PLAN
VAC and Transdev Services Inc will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when once American Community Survey 5-year data is available based on 2010 U.S. Census figures, or when it is clear that higher concentrations of LEP individuals are present in the VAC service area. As of early 2013, the US Census has not yet made language data available based on the 2010 census at the block level. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether VAC’s financial resources are sufficient to fund language assistance resources needed
- Determine whether VAC has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning VAC’s failure to meet the needs of LEP individuals

DISSEMINATION OF THE VAC LEP PLAN
A link to the VAC LEP Plan and the Title VI Procedures is included on the VAC website at www.vacdk.com and www.cityofdekalb.com. Any person or agency with internet access will be able to access and download the plan from the VAC website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which VAC will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Voluntary Action Center of DeKalb County, Executive Director or the City of DeKalb, DSATS Coordinator:

City of DeKalb  
Attn: Transit Manager  
200 S. Fourth Street  
DeKalb, IL 60115

Phone: (815)-748-2370  
Fax: (815)-748-2024  
Email: marcus.cox@cityofdekalb.com (Marcus Cox, Transit Manager)
DEKALB REGION TITLE VI PROGRAM

Voluntary Action Center
Attn: Executive Director
1606 Bethany Rd.
Sycamore, IL 60178

Phone: (815) 758-3932
Fax: (815) 758-0202
Email: erogers@vacdk.com (Ellen Rogers, Executive Director)

Transdev Services Inc
Attn: General Manager
1825 Pleasant St.
DeKalb, IL 60115

Phone: (815)-758-6900
Fax: (815)-748-5668
Email: Melissa.ohrwall@transdev.com (Melissa Ohrwall, General Manager)

DeKalb-Sycamore Area Transportation Study
Attn: DSATS Coordinator
1826 Barber Greene Rd.
DeKalb, IL 60115

Phone: (815) 756-9513
Email: bdickson@dekalbcounty.org (Brian Dickson, MPO Coordinator)
VAC/HUSKIE LIMITED ENGLISH PROFICIENCY SURVEY: RESULTS

Total Number of Responses: 33

1. Have you received any training on how to deal with persons who have limited English skills?
   YES 8          NO 25
   a. Please give a brief description of the type of training you have had.
      ➢ LEP Hotline
      ➢ Military training for dealing with language barriers
   b. Please describe past experiences or advice that has helped you in these situations.
      ➢ Just try to talk as slow and as clear as possible
      ➢ Use hand motions and talk slowly
      ➢ Use flash cards if available
      ➢ Patience

2. On average, how often do you interact with persons where language skills have been an issue in communicating with them?
   a. Never 4 12%
   b. A few times a year 14 42%
   c. Once a month 6 18%
   d. 2-3 times a month 2 6%
   e. Once a week 0 0%
   f. 2-3 times a week 6 18%
   g. 4-6 times a week 0 0%
   h. Every day 1 3%

3. On average, please indicate the type of communication issues you have, by percentage, with those having communication issues. Responses should total to 100%.
   a. Person(s) speaks English but is difficult to understand 35%
   b. Person(s) speaks broken English, but attempts to communicate 48%
   c. Person(s) speak no English, speaks entirely in native language 16%

4. While it is difficult to tell what language a person is speaking, please estimate, by percentage, the types of foreign languages persons are typically speaking. If known, please indicate the language(s).
   a. Spanish 55%
   b. Asian Languages (please indicate, if known) 15%
   c. European Languages (please indicate, if known) 6%
   d. Indian / Middle Eastern (please indicate, if known) 18%
   e. Other (please indicate, if known) 6%
5. When interacting with persons with limited English skills, please describe what types of issues the person(s) seem to be concerned about.
   - Where they are going and how they can get home
   - How to get to and from a job
   - Where, when, how, and what time a bus is coming and how to get somewhere
   - Which bus to take to get to where they’re going
   - Where they want to be dropped off or picked up
   - Getting to their destination
   - Getting to their stop
   - Where they need to go
   - Making sure they are explaining themselves so that I understand it
   - Communicating where they need to go
   - Getting them to understand what you are saying.
   - Making sure I understand the proper location for his/her drop off
   - Where the bus goes
   - What bus they need for a certain location

6. Please describe how situations with persons with limited English skills are usually resolved.
   - Asking them to talk slowly
   - Mutually understood word, i.e.: Wal-Mart
   - They write out what they mean
   - Using a map
   - I try to use a lot of hand gestures and/or ask them to speak slowly and more clearly
   - By calling a service that translates the call for us
   - There are no issues
   - Use Google on my phone
   - Word/picture association
   - Pen and paper
   - Speak in simple English
   - Patience and a lot of non-verbal communication
   - Hand gestures
   - Sometimes a passenger can interpret what they’re saying
   - I try to help as much as I can. If a passenger can assist, we use them
   - If possible, I try to find a translator or person that knows their language
   - By someone who can translate

7. Do you speak any other languages besides English? If yes, please indicate what languages.
   YES 9  NO 24
   a. Please indicate which languages.
      - Spanish
      - Swahili
      - Little Spanish, little French
8. Please describe one or two memorable events about dealing with persons with limited English skills, describing the situation and how it was ultimately resolved (good or bad). Please use extra blank pages if needed.

- I haven’t had any events
- Frustrating on both sides but genuinely accepted
- A passenger got on at one stop and was trying to find the closest stop near their destination but did not know how to ask me in English. They showed me their phone with an address on it. I understand Spanish, luckily, so they relaxed when I spoke to them, and I got them to the nearest stop and was able to guide them the rest of the way.
- There was a regular rider who’d needed a stop that would be serviced by another bus, but she only spoke Spanish. I used the Spanish I knew to explain that she needed the other bus, and I told that driver what to expect for the rider.
- There was a young man of Indian descent who was asking to be taken to the Islamic Worshipping Center. While I kept explaining that it was one of my last stops on the route, he kept fussing at me for going the wrong way. He eventually (quite abruptly) asked to be let off.
- Somebody who spoke the same language as the passenger helped me out.
- I transported a hearing-impaired individual and she had paperwork.
- A passenger tried to ask what bus she needed to get on, but I didn’t understand her, so she showed me a map.
- I use a lot of broken Spanish to try to help.
- If all else fails with the technology we have available on our phones, I use an app that translates for me.

9. Please provide us with any suggestions you may have, and any questions you have that you wish would be answered about how to deal with persons with limited English skills.

- If possible, we should all have a translator app available on our phones
- Flash cards
- Map books
- Skill training on how to talk with passengers who have heavy accents
- Place bi-lingual driver on routes with common occurrences

Administered April/May of 2019
Voluntary Action Center

Procedure for Assisting Limited English Speaking Customers

VAC is committed to assisting limited English Speaking customers to be able to arrange rides and utilize VAC’s transportation services without potential barriers caused by limited English speaking abilities. VAC staff will utilize the following procedures when serving limited English speaking customers by telephone or in the course of providing transportation services.

**Telephone Inquiries and Trip Reservations**
- If the customer contacts VAC by telephone, VAC staff will attempt to determine what language the individual is speaking. The VAC staff person will then ask the customer to “hold on” the telephone and will place the caller on hold.
- VAC staff will then call Language Line Services at 1-888-808-9008 and at the prompt, will enter our 8-digit PIN number.
- The VAC staff person will then speak the name of the desired language, if known. An interpreter will be connected.
- The VAC staff person will explain to the interpreter what is needed, will then press “Feature” then “3” on the telephone key pad, and then will press the line button that is flashing with the customer on hold. A three-way conversation between the customer, the interpreter and the VAC staff person can now take place.

**In Person Inquiries and Trip Reservations**
- If the customer appears in person at the VAC offices, the VAC staff person will attempt to determine what language the customer is speaking by handing them the Language Identification Flash Card. The customer may be able to point to what language they are proficient in on the Flashcard.
- VAC staff will then call Language Line Services at 1-888-808-9008 and at the prompt, will enter our 8-digit PIN number.
- The VAC staff person will then speak the name of the desired language, if known. An interpreter will be connected.
- The VAC staff person will explain to the interpreter what is needed, and will then share the telephone handset with the customer or place the telephone on the Speakerphone function by pressing the “Hands free” button on the telephone keypad.
Voluntary Action Center
Procedure for Assisting Limited English Speaking Customers

Bus and Vehicle Operator Contacts with Limited English Speaking Customers
- If a customer with limited English speaking skills boards a VAC vehicle or is on board a VAC vehicle; and if the customer attempts to communicate with the vehicle Operator, the Operator will contact the VAC Dispatch Center to advise them that they are making use of our Language Line Service. The Operator will then hand the customer the Language Identification Flashcard. The customer may be able to point to what language they are proficient in on the Flashcard.
- The Operator will then call Language Line Services at 1-888-808-9008 utilizing their cell phone and at the prompt will enter our 8-digit PIN number — [redacted].
- The Operator will then speak the name of the desired language, if known. An interpreter will be connected.
- The Operator will explain to the interpreter what is needed, and will share the cell phone with the customer in order to speak with the interpreter. The Operator will advise the Dispatch Center as to the disposition of the use of the Language Line Service.

Language Line® Personal Interpreter Service
- To connect to an interpreter, dial 1 888 808-9008 or +1 831 242-8841 if calling from outside of North America.
- At the prompt, enter your 8-digit PIN number:
- Speak the name of the desired language.
- If the language you requested is correct, press 1.
- An interpreter will be connected. Tell them what you want to accomplish and give them any special instructions.
- Provide the number if you need to have the interpreter place an international or domestic call.
### Huskie Line
Log For Assisting Limited English Speaking Customers

#### 2019

<table>
<thead>
<tr>
<th>DATE</th>
<th>LANGUAGE REQUESTED</th>
<th>LOCATION WHERE SERVICE WAS ASSESSED (OFFICE OR VEHICLE)</th>
<th>INITIALS</th>
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<tbody>
<tr>
<td>Q1 Jan 19 - Mar 17</td>
<td>No Requests</td>
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<td>mco</td>
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Huskie Line
Log For Assisting Limited English Speaking Customers
2019

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<tr>
<th>DATE</th>
<th>LANGUAGE REQUESTED</th>
<th>LOCATION WHERE SERVICE WAS ASSESSED (OFFICE OR VEHICLE)</th>
<th>INITIALS</th>
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<tr>
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<td>mco</td>
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### Voluntary Action Center
**Log for Assisting Limited English Speaking Customers**

<table>
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<tr>
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<th>Language Requested</th>
<th>Location Service Was Assessed (Office or Vehicle)</th>
<th>Initials</th>
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</thead>
<tbody>
<tr>
<td>Q1 2016</td>
<td>No requests made</td>
<td></td>
<td>BP</td>
</tr>
<tr>
<td>Q2 2016</td>
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<td>BP</td>
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<td>Q3 2016</td>
<td>No requests made</td>
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<tr>
<td>Q4 2016</td>
<td>No requests made</td>
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### Voluntary Action Center
*Log for Assisting Limited English Speaking Customers*

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<td>Q1 2017</td>
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<td>BP</td>
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<tr>
<td>Q2 2017</td>
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<td>BP</td>
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<tr>
<td>Q3 2017</td>
<td>No requests made</td>
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<td>Q4 2017</td>
<td>No requests made</td>
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<td>BP</td>
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</table>
**Voluntary Action Center**

*Log for Assisting Limited English Speaking Customers*

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<td></td>
<td>BP</td>
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<td>BP</td>
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<td>No requests made</td>
<td></td>
<td>BP</td>
</tr>
<tr>
<td>Q4 2018</td>
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<td></td>
<td>BP</td>
</tr>
</tbody>
</table>
### Voluntary Action Center
**Log for Assisting Limited English Speaking Customers**

<table>
<thead>
<tr>
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<th>Language Requested</th>
<th>Location Service Was Assessed (Office or Vehicle)</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1 2019</td>
<td>No requests made</td>
<td></td>
<td>TS</td>
</tr>
</tbody>
</table>
INTRODUCTION

Service Standards and Policies

The City of DeKalb has developed quantifiable service standards and policies.

These service standards include:

- Vehicle Load
- Headways (Frequencies)
- On-time performance
- Service Availability Standards
- Vehicle Assignments
- Transit Amenities

Vehicle Load Standards

As shown, the City of DeKalb has adopted the load factors. The Preferred Load category equals 1.5 times the seated capacity.

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>Seated Capacity (SC) Preferred</th>
<th>Standing Capacity (1/2 x SC)</th>
<th>Total Capacity</th>
<th>Maximum Load (2 x SC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004 Low Floor Gillig</td>
<td>29</td>
<td>15</td>
<td>44</td>
<td>58</td>
</tr>
<tr>
<td>2005 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2006 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2007 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2009 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2010 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2011 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2014 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2015 Low Floor Gillig</td>
<td>31</td>
<td>16</td>
<td>46</td>
<td>62</td>
</tr>
<tr>
<td>2017 Low Floor Gillig</td>
<td>29</td>
<td>15</td>
<td>44</td>
<td>58</td>
</tr>
</tbody>
</table>

Vehicle Headway Standards
The City of DeKalb’s general vehicle headway standard is to provide headways on all routes that are 60 minutes or better. Among the City’s network of eight bus routes, there is headway variation as a result of ridership demand and the constraints of municipal budgets.

### Current Headways

<table>
<thead>
<tr>
<th>Route Name/Number</th>
<th>Service Type</th>
<th>Weekday Peak</th>
<th>Weekday Off Peak</th>
<th>Saturday</th>
<th>Sunday</th>
</tr>
</thead>
<tbody>
<tr>
<td>Route 2 (Residence Halls)</td>
<td>Urban Circulator</td>
<td>10 min</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 3 (Greek Row)</td>
<td>Urban Circulator</td>
<td>10 min</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 4 (North Campus)</td>
<td>Urban Circulator</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 5 (Eco Park Apts.)</td>
<td>Urban Circulator</td>
<td>15 min</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 16 (South Campus)</td>
<td>Urban Circulator</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
</tr>
<tr>
<td>Route 17 (Sycamore Road)</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
</tr>
<tr>
<td>Route 18 (Health Dept.)</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
</tr>
<tr>
<td>Elburn Shuttle (Train Station)</td>
<td>Linear Regional Fixed Route</td>
<td>60 min</td>
<td>60 min</td>
<td>N/A</td>
<td>60 min</td>
</tr>
</tbody>
</table>

### On-Time Performance Standards

Among the most important service standards for riders is on-time performance or adherence to published schedules. A vehicle is considered on time if it departs a scheduled time point no more than 0 minutes early and no more than five minutes late. The City’s proposed long-term adherence standard is 90% or greater on both route and system levels.

### Service Availability Policies

At the present time, geographical and budgetary challenges prevent the City of DeKalb from setting a standard whereby x percent of all residents in the service area are within y distance of public transit service; however, the agency will conduct planning and goal-setting activities with the public and DSATS members to develop a policy goal.
Vehicle Assignment Policy

Vehicles are not assigned to specific routes and are circulated throughout the fixed route system based on ridership demand and operational or geographic limitations. Within these constraints, City contractor’s staff are training to deploy vehicles as evenly as possible throughout the system.

Transit Amenities Policy

- **Bus Stops** – the City provides approximately 200 bus stops across its service including in DeKalb, Sycamore, Northern Illinois University, Kishwaukee College, and the Elburn Train Station.
- **Bus Shelters** – As of May 2019, the City of DeKalb transit system has approximately 20 bus shelters. Current shelters are placed at locations that demonstrate higher ridership volume, serve as major transfer points and/or destinations, and where space and property easement are available.
- **Route and Schedule Information** – the City distributes printed route and schedule information at the DeKalb City Hall, on buses, at the Voluntary Action Center of DeKalb County and Transdev Services Inc. administrative office and locations throughout the region such as social service agencies. Route maps and schedules can be downloaded and printed from our website at www.cityofdekalb.com.
- **Real Time Bus Arrival Information** – With the assistance of Transdev Services Inc., fixed route bus passengers have access to real time bus information via ETA Transit and the mobile phone application ETA Spot. Passengers are able to obtain the information online or on a smartphone where they can view the location of all routes and vehicles.

Monitoring Service Standards

For ongoing monitoring and measurement of service standards and policies, COD transit proposes to use the following schedules and methods:

<table>
<thead>
<tr>
<th>Service Standard/Policy</th>
<th>Evaluation Frequency</th>
<th>Methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Headways</td>
<td>Annually</td>
<td>Schedule Review</td>
</tr>
<tr>
<td>On-Time Performance</td>
<td>Monthly</td>
<td>Automatic Vehicle Locator, Random Checks</td>
</tr>
<tr>
<td>Service Availability</td>
<td>Annually</td>
<td>GIS Review</td>
</tr>
<tr>
<td>Vehicle Assignments</td>
<td>Quarterly</td>
<td>AVL and Records Review</td>
</tr>
<tr>
<td>Transit Amenities</td>
<td>Annually and with deployment of new amenities</td>
<td>System Wide Review</td>
</tr>
</tbody>
</table>
Construction Equity Analysis

Over the past three years, the City of DeKalb did not plan for the construction of any new facilities. When COD plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operations center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied to the analysis:

- 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;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

COD will follow federal guidance provided in FTA Circular 4703.1 (August 2012).
Section V. FTA Title VI Program Chapter VI: Requirements for Metropolitan Transportation Planning Organizations

INTRODUCTION

This chapter describes the procedures that metropolitan planning organizations (MPOs) shall follow in order to comply with the DOT’s Title VI regulations. MPOs are also responsible for following the general requirements in Chapter III of this circular.

An MPO may serve many different roles depending on its “recipient” status, i.e., designated recipient, direct recipient, primary recipient, or subrecipient. This chapter describes the many roles an MPO may fill, and provides guidance on Title VI compliance for each of those roles.

REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

Title 49 CFR Section 21.9(b) requires recipients to submit reports to FTA in order for FTA to ascertain whether the recipient is in compliance with the DOT Title VI regulations, and recipients must have available “racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.” As stated in Chapter III of this Circular, FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years, or as otherwise directed by FTA.

For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. FTA will review and concur or request the recipient provide additional information. Subrecipients, including MPOs that receive Federal planning money from the State, shall submit Title VI Programs to the State as the primary recipient from whom they receive funding, on a schedule to be determined by the State, in order to assist the State in its compliance efforts. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the State. See Appendix L for clarification of reporting responsibilities by recipient category.

MPOs shall include the following information in their Title VI Programs.

a. In its regional transportation planning capacity, the MPO shall submit to the State as the primary recipient, and also to FTA:

(1) All general requirements set out in section 4 of Chapter III of this Circular;

The City of DeKalb has prepared the Title VI Plan as the official plan for the City of DeKalb, DSATS, Transdev Services Inc, and the Voluntary Action Center (VAC). All four agencies shall adopt this plan as their official plan.

(2) A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate;
The Demographics and Environmental Justice section of the DSATS 2040 Long Range Transportation Plan has been included in this report (see DSATS 2040 Long Range Transportation Plan Demographic Profile).

(3) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process;

**The Environmental Justice Populations**

section of the demographics analysis describes how the DeKalb region should include minority populations in the planning process.

(4) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient;

Analysis of minority populations and the distribution of public transit funding can be found in the demographic analysis section of this document.

(5) An analysis of impacts identified in paragraph (4) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

Analysis of impacts on Title VI and Environmental Justice populations is addressed in the Environmental Justice Populations section of this document.

b. In its capacity as a direct recipient, the MPO shall submit to FTA:

(1) The information required under section 2a of this chapter; and

(2) If the MPO is a provider of fixed route public transportation service, the information required under section 2 of chapter IV (Requirements and Guidelines for Fixed Route Transit Providers). The reporting requirements that the MPO must follow for the provision of public transportation service will be based on whether the MPO serves a large UZA with 200,000 or more in population and whether the number of fixed route vehicles in peak service is 50 or more.

The DeKalb Sycamore Area Transportation Study (DSATS) MPO does not provide any public transportation services.

c. In its capacity as a primary recipient, the MPO shall submit to FTA:

The DeKalb Sycamore Area Transportation Study (DSATS) MPO is not the primary recipient of FTA funds. The City of DeKalb is the primary recipient.
PLANNING

All MPOs are responsible for conducting planning activities that comply with 49 U.S.C. Section 5303, Metropolitan Transportation Planning, as well as subpart C of 23 CFR part 450, Metropolitan Transportation Planning and Programming, for a specified metropolitan planning area. Since States “pass through” planning funds to the MPO, MPOs are subrecipients of the State and must submit Title VI compliance reports for planning activities to the State in order to assist the State in demonstrating compliance with Title VI. The State is thus responsible for monitoring the Title VI compliance of the MPO for those activities for which the MPO is a subrecipient. If the MPO passes planning funds through to one or more subrecipients, the MPO is responsible for ensuring those subrecipients comply with Title VI. FTA C 4702.1B Chap. VI-3

All MPOs are required to self-certify compliance with all applicable Federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance. As part of the planning certification review, FTA/FHWA review MPO-developed documentation to determine whether MPOs have:

a. Analyzed regional demographic data to identify minority populations within the region.

b. Where necessary, provided member agencies with regional data to assist them in identifying minority populations in their service area.

c. Ensured that members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow these populations to participate fully in the process.

d. Monitored the activities of subrecipients with regard to Title VI compliance, where the MPO passes funds through to subrecipients.

REQUIREMENTS FOR PROGRAM ADMINISTRATION

In order to comply with 49 CFR Section 21.5, the general nondiscrimination provision, MPOs shall document that they pass Chap. VI-2 FTA C 4702.1B through FTA funds under any FTA programs (e.g., 49 U.S.C. 5310, Enhanced Mobility for Seniors and Individuals with Disabilities), to subrecipients without regard to race, color, or national origin, and assure that minority populations are not being denied the benefits of or excluded from participation in these programs.

MPOs shall prepare and maintain, but not report unless requested by FTA, the following information:

a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.
DEKALB REGION TITLE VI PROGRAM

b. A description of how the MPO develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding the availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.

c. A description of the MPO’s criteria for selecting entities to participate in an FTA grant program.
Section VI. DSATS 2040 Long Range Transportation Plan Demographic Profile

The following section is the demographic profile of the DSATS region. The majority of the demographic information comes from the 2010-2014, 2013-2017 and 2008-2012 American Community Surveys. Demographic and socioeconomic data is vital to the DSATS Long Range Transportation Plan and all planning processes. Population is a key variable in forecasting travel demand, and additional variables such as number of households and employment status help in understanding travel behaviors. Population also determines the amount of federal assistance the region is eligible to receive for the purpose of improving area transportation. Gaining a baseline understanding of these variables in the DSATS planning area helps the MPO gauge current and future needs of area residents and communities.

The ACS releases data in the form of 1-year, 3-year, and 5-year estimates. When analyzing population and other socioeconomic trends, 2010 census data for the census tracts comprising the DSATS region are compared against the most recent ACS data. For the purposes of this plan, the 5-year ACS estimates are used when possible as they offer a more statistically accurate reflection of demographic changes than the 1-year and 3-year estimates.

For the 2040 LRTP Update, past and current demographic and socioeconomic data were obtained from the 2010 U.S. Census and the 08-12 American Community Survey (ACS). Due to a shift in federal policy, the 2010 Census only collected basic information on population, age, race, sex, ethnicity, and some household and housing characteristics. Other data, such as vehicle availability, income and poverty are now compiled on an annual basis by the ACS, which surveys a smaller set of the population, and uses statistical methods to provide estimates. The 5-year 08-12 ACS1 was used as reference for specific characteristics that influence the use of transit that are no longer available through the decennial census. Employment estimates for 2010 were based on data from the U.S. Department of Commerce and U.S. Census Longitudinal Employer-Household Dynamics Data (LEHD).

Specific demographic and socioeconomic data that is summarized in this section include:

- Population
- Total Households
- Employment Levels
- Population Age
- Minority Levels
- Persons of Hispanic Origin
- Single Head of Household Households
- Zero Vehicle Households
- Languages Spoken in Household
In analyzing these variables, DSATS is identifying only basic trends. While comparing 5-year ACS estimates to older census data gives us a general understanding of how the area is changing, the differing natures of the data sets makes more advanced statistical analysis difficult.

SOCIOECONOMIC DATA: YEAR 2000

Population
The US Census Bureau provides the number of persons and households by census block. Census blocks are the smallest geographic area in which some census data is made available to the public. Census blocks are areas bounded on all sides by visible features, such as roads, streams, railroad tracks, and invisible boundaries, such as political borders, property lines, and short, imaginary extensions of streets and roads. In general, census blocks are small in area; for example, a block bounded by city streets. However, census blocks in sparsely settled areas, or areas not divided by physical barriers or political boundaries, may contain many square miles of territory.

Most of the urban areas within the DeKalb-Sycamore Metropolitan Planning Area have population densities above five (5) persons per acre. However, many blocks within the older neighborhoods of DeKalb, Sycamore, and Cortland have densities between 10 to 15 persons per acre and several blocks display an average of 15 to 30 persons per acre. These higher densities can be attributed to the dorms within the NIU Campus as well as the retirement centers that exist within DeKalb. Most of the planning areas outside the urban centers have densities less than two persons per acre, while newer residential developments in these areas tend to feature low densities of 5 to 10 persons per acre. The average density for the entire MPA is slightly over 1 person per acre. Many of the new developments in DeKalb, Sycamore, and Cortland were built after the 2000 census and therefore show very low densities that are not characteristic of the suburban developments. It is anticipated that once the new 2020 census figures come out that the densities in these areas should increase significantly.

Households
Households or dwelling units are typically used as the variable for calculating travel trips based on corresponding trip generation rates. The existing Travel Demand Proto Model provides trip generation rates for households by size (persons per household) and by the number of autos available.

The number of households generally corresponds with population. However, there are subtle differences between geographic areas based on type of housing units and household size. For example, areas with primarily single-family detached housing will likely have larger families, whereas areas apartments and townhouses are likely to have more one or two person households. Not surprisingly, larger households tend to generate more travel trips than do smaller households.

Average household size can vary significantly by neighborhood. Household size can also change over time. Over the last several decades, average household size has decreased dramatically,
due to people having fewer children, people waiting longer to have children, more single-parent families, people living longer and thus a greater number of older people living alone, and rising incomes which allow persons to afford to live alone.

**Employment**

Employment data by type of employment is required input into the trip generation component of the travel demand model. The US Census Bureau provides employment data by Transportation Analysis Zone (TAZ) through the Census of Transportation Planning Package (CTPP). However, the current TAZ boundaries are much larger than census blocks and provide only generalized employment location information. Furthermore, this data is derived from the census survey long-form, which only goes to about one in every six households.

Identifying concentrations of employment, and thus travel destinations, is useful in evaluating transportation improvement options. This is because commuting trips to work, which typically occur during the “rush hour” periods of the day, place the greatest strain on the transportation system on a daily basis. Employment within the DeKalb-Sycamore area is relatively dispersed. While the downtown areas of DeKalb and Sycamore have some of the highest concentrations of employment in the region, the downtowns do not feature the employment concentrations found in many similar sized communities. The greatest concentration of employment within the MPA is actually located at the NIU campus, with other employment concentrations including the Sycamore Road corridor connecting DeKalb and Sycamore as well as a developing set of industrial, transportation and logistics uses along the I-88 Corridor.

**SOCIOECONOMIC ANALYSIS**

**DSATS Population**

Figure 3: DSATS Total Population

![DSATS Total Population](chart)

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>1990 Census</td>
<td>45,596</td>
</tr>
<tr>
<td>2000 Census</td>
<td>55,805</td>
</tr>
<tr>
<td>2005-2007 Estimates</td>
<td>61,984</td>
</tr>
<tr>
<td>2006-2008 Estimates</td>
<td>64,703</td>
</tr>
<tr>
<td>2010 Census</td>
<td>73,080</td>
</tr>
<tr>
<td>2008-2012 Estimates</td>
<td>73,983</td>
</tr>
<tr>
<td>2010-2014 Estimates</td>
<td>73,448</td>
</tr>
<tr>
<td>2013-2017 Estimates</td>
<td>72,642</td>
</tr>
</tbody>
</table>

Source: US Census FactFinder
Table 5: Percent Change in Population

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>45,596</td>
<td>55,805</td>
<td>61,984</td>
<td>64,703</td>
<td>73,080</td>
<td>73,983</td>
<td>73,448</td>
<td>72,642</td>
</tr>
<tr>
<td>Percent Change from last Census</td>
<td>0</td>
<td>22.4%</td>
<td>11.1%</td>
<td>15.9%</td>
<td>30.9%</td>
<td>1.2%</td>
<td>.05%</td>
<td>-1.1%</td>
</tr>
</tbody>
</table>

Total population in the DSATS area has been growing since 1990. This rise has been accompanied by an increase in the number of households, along with a greater minority population and an increase in persons of Hispanic origin. From a general standpoint, these population increases have impacted the area’s transportation network, with roads being built to coincide with development, local transit providers increasing their service levels, and development incorporating bicycle and pedestrian routes. During the late 90’s and the first half of the 00’s, the DSATS region saw a large increase in development. Many new subdivisions on the outskirts of Sycamore and Cortland sprouted up during this period. After the financial collapse of 2008, much of the development of these new subdivisions came to an abrupt halt, which can be seen from the numerous new subdivision roadways built with many of the lots remaining empty.

**DSATS Households**

*Figure 4: DSATS Total Households*
Table 6: Percent Change in Households

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households</td>
<td>14,741</td>
<td>19,610</td>
<td>21,342</td>
<td>21,831</td>
<td>26,772</td>
<td>24,726</td>
<td>25,922</td>
<td>28,710</td>
</tr>
<tr>
<td>Percent Change from last Census</td>
<td>33.0%</td>
<td>8.8%</td>
<td>11.3%</td>
<td>36.5%</td>
<td>-7.7%</td>
<td>-3.2%</td>
<td>10.8%</td>
<td></td>
</tr>
</tbody>
</table>

The total number of households in the Urbanized Area has followed the same general trend as total population. Development within the area has slowed with the national housing downturn and recession. Between 2000 and 2010 the DeKalb metropolitan area saw a very significant growth in households, increasing by 36.5%. In comparison, there was a 10% decrease in households between 2010 and the 2010-14 ACS periods. However, there was a 10.8% increase from the 2010-2014 ACS to the 2013-2017 estimates.

DSATS Area Employment

Figure 5: DSATS Area Employment

Table 7: DSATS Workforce, Employment, and Unemployment

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment</td>
<td>23,765</td>
<td>28,568</td>
<td>32,632</td>
<td>34,218</td>
<td>52,099</td>
<td>36,339</td>
</tr>
<tr>
<td>Labor Force</td>
<td>24,880</td>
<td>30,981</td>
<td>35,928</td>
<td>38,012</td>
<td>58,111</td>
<td>40,430</td>
</tr>
<tr>
<td>Unemployment</td>
<td>2.9%</td>
<td>7.8%</td>
<td>9.1%</td>
<td>10.0%</td>
<td>10.4%</td>
<td>5.5%</td>
</tr>
</tbody>
</table>
Along with a significant increase in population, the DSATS area has also seen a significant increase in employment and labor force, increasing around 78% from 2000 to 2016. It is important to note the presence of thousands of Northern Illinois University students may seriously skew employment data for the Urbanized Area and show unemployment as being higher than it actually is. Also of distinction are the differing methods by which the U.S. Census and American Community Survey calculate unemployment levels: in 2000, the Census Bureau looked at employment status the week prior to Census Day (April 1, 2000) while ACS data is gathered year-round and therefore reflects multiple reference points.

**DSATS Population by Age**

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Under 18</strong></td>
<td>8,014</td>
<td>11,262</td>
<td>18,072</td>
<td>19,436</td>
<td>15,333</td>
<td>15,486</td>
</tr>
<tr>
<td>% of Total Pop.</td>
<td>17.6%</td>
<td>20.2%</td>
<td>29.2%</td>
<td>30.0%</td>
<td>20.9%</td>
<td>21.0%</td>
</tr>
<tr>
<td>% of Change since last census</td>
<td>40.5%</td>
<td>60.5%</td>
<td>72.6%</td>
<td>36.1%</td>
<td>1.0%</td>
<td></td>
</tr>
<tr>
<td><strong>18-64</strong></td>
<td>33,805</td>
<td>39,760</td>
<td>39,172</td>
<td>40,309</td>
<td>51,324</td>
<td>49,691</td>
</tr>
<tr>
<td>% of Total Pop.</td>
<td>74.1%</td>
<td>71.2%</td>
<td>63.2%</td>
<td>62.3%</td>
<td>69.9%</td>
<td>68.7%</td>
</tr>
<tr>
<td>% of Change since last census</td>
<td>17.6%</td>
<td>-1.5%</td>
<td>1.4%</td>
<td>29.1%</td>
<td>-3.2%</td>
<td></td>
</tr>
<tr>
<td><strong>Over 65</strong></td>
<td>3,777</td>
<td>4,783</td>
<td>4,740</td>
<td>4,958</td>
<td>6,791</td>
<td>7,411</td>
</tr>
<tr>
<td>% of Total Pop.</td>
<td>8.3%</td>
<td>8.6%</td>
<td>7.6%</td>
<td>7.7%</td>
<td>9.2%</td>
<td>11.3%</td>
</tr>
<tr>
<td>% of Change since last census</td>
<td>42.0%</td>
<td>3.7%</td>
<td>-0.9%</td>
<td>26.6%</td>
<td>9.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>45,596</td>
<td>55,805</td>
<td>61,894</td>
<td>64,703</td>
<td>73,448</td>
<td>72,642</td>
</tr>
<tr>
<td>% of Total Pop.</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>% of Change since last census</td>
<td>22.4%</td>
<td>11.1%</td>
<td>15.9%</td>
<td>31.6%</td>
<td>-1.1%</td>
<td></td>
</tr>
</tbody>
</table>

The DSATS Urbanized Area has seen a 25.5 percent increase in the population of children under the age of 18, increasing from Census 2000 to the 2013-17 ACS Estimates numbers. These figures could indicate a large influx of family households into the region over the past 20 years. The biggest impact of such a large increase would be a large increase in the number of schoolchildren (a number of new schools have been built recently) and the increase in traffic taking children to and from school as well as sporting and other children’s events. The number of people 35 to 64 has also increased significantly, corresponding to the general population increase as a whole during that period. In the DSATS region, the majority of transit riders are
senior citizens, and over the years, the need for transportation via MedVAC and other paratransit services has steadily increased.

Since 2000, the 65 and over population has increased 50.1 percent. While the U.S. population as a whole is more mobile, the majority of seniors tend to remain in the communities they have lived in. It is expected that in the DSATS region, the percentage of seniors will increase, mirroring national trends. This will likely result in more demand for transportation services to medical facilities, many of which are located in the Rockford and Chicago metropolitan areas.

LAND USE
The following discussion relates to how the population utilizes land and specifically how land use relates to transportation and vice versa.

The Transportation and Land Use Relationship – The organization of daily life creates the demand for travel. The demand for publicly accessible transportation connections between geographic locations has continued to grow into a desire for faster and more comfortable travel. The result of this demand has been the development of extensive transportation networks and technological advances in transportation. These transportation improvements in turn have impacted daily activities, where geographic distances are less of a factor than in the past.

Only a century ago, walking distances defined the geographic relationship between daily activities. The destination of one’s work, shopping, social and religious institutions needed to be within a reasonable walking distance of one’s home. These distances were a function of time; that is, the location of one’s home and one’s daily destinations were tied to how much time they were willing to take to travel between destinations. These “time budgets” were defined by the transportation system and the transportation modes available. Households still make travel decisions based on time budgets. However, the development of automobiles and the corresponding roadway infrastructure has made it possible to travel much greater distances within an allotted time, allowing daily activities to be located much farther from one’s home.

The diagram at the right is meant to provide a simplistic representation of the reciprocal relationship that exists between land use and transportation. Just as the transportation system impacts location and destination decisions, the location, mix, and design of destinations greatly impact the demand for the transportation system. Improved transportation systems allow greater accessibility between dispersed land uses. In turn, dispersed land uses require more travel and thus more demand for transportation infrastructure.
The correlation between land use and transportation should not be underestimated. Land use patterns and development decisions are often seen as controlled solely by market forces, leaving public agencies to respond to the transportation demand created in their wake. However, public land use policies directly affect private land use decisions such as zoning regulations and minimum parking requirements. Therefore, land use policies need to be considered in relation to the impact of transportation just as transportation policies need to be considered in relation to land use.

Transportation systems and land use patterns have a well-documented reciprocal relationship. As communities have grown, the demands for transportation system improvements have also grown. However, these transportation improvements have also provided more convenient access to land farther out, thus spurring further growth. More than any other transportation system, it has been the road network and the prevalence of the automobile that has impacted land use patterns over the past half-century.

Existing Land Use: several notable land use patterns are displayed in the different municipalities:

- Downtown DeKalb provides for commercial and retail uses along Lincoln Highway and separates these uses from the multiple levels of housing density that are prevalent within the municipality.
- The NIU Campus is located west of Downtown DeKalb, and features some of the highest concentrations of both employment and residences in the region. The high density residential district north of campus houses a high proportion of the off-campus student population.
- Industrial, office and transportation uses are located in the south and east portions of DeKalb, oriented to the rail line, airport and I-88 corridor.
- Cortland provides for a very small amount of commercial uses, while low density residential and industrial uses occupy the majority of the incorporated areas of Cortland.
- Sycamore provides the greatest mix of land uses within the incorporated area. Commercial, medium density residential, and institutional uses are mixed throughout the Downtown area, while low density residential mixed with open space uses are most common in the developing parts of Sycamore (north and east of the Downtown).

ENVIRONMENTAL JUSTICE

In 1994, federal Executive Order 12898 directed every federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies and activities on "minority populations and low-income populations." The order reads as follows:

"Each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The order reinforces Title VI of the Civil Rights Act of 1964, which reads: "No person in the United States shall, on the ground of race, color or national origin be excluded from
participation in, be denied the benefits of, or be subjected to discrimination under any programs or activity receiving federal financial assistance." The executive order essentially reminds all government agencies receiving federal funding that they are required to address discrimination as well as the consequences of all their decisions or actions that might result in disproportionately high and adverse environmental and health impacts on minority and low-income communities.

In 1997, the United States Department of Transportation issued its Order to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order). The DOT Order addresses the requirements of Executive Order 12898 and sets forth DOT's policy to promote the principles of environmental justice in all programs, policies and activities under its jurisdiction.

Since the DOT Order was issued, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have been working with their state and local transportation partners to make sure that the principles of environmental justice are integrated into every aspect of their mission.

The three fundamental environmental justice principles include:

1. To avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority 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 of or significant delay in the receipt of benefits by minority and low-income populations.

MPO Role
As the primary forum where State DOTs, transit providers, local agencies, and the public develop metropolitan area transportation plans and programs, MPOs can help local public officials understand how Title VI and environmental justice requirements improve planning and decision-making. To certify compliance with Title VI and address environmental justice, MPOs need to:

- Enhance their analytical capabilities to ensure that the long-range transportation plan and the transportation improvement program (TIP) comply with Title VI.
- Identify residential, employment, and transportation patterns of low-income and minority populations so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed.
- Evaluate and, where necessary, improve their public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

The following sections provide an overview of populations within the DSATS region who should be considered when identifying disadvantaged communities. Using the 2010-2014 and 2008-2012 American Community Survey of the US Census, these populations are identified as part of
the overall DSATS region population. Maps are also provided identifying the percentage of the populations per block or block group. Please note many of the larger block and block groups outside the main urban areas have smaller populations where the percentage of a population can indicate a very high rate of poverty, minority population, etc. The actual number of persons in that group, however, may be very low (i.e. a block could only have 10 residents and five are below the poverty level, which would indicate a 50% poverty rate, however, five persons as part of the entire DSATS region is very small).

**DSATS Minority Population**

The DeKalb region is predominately white with around 80% of the population identifying themselves white. According to the 2010 Census, around 19.8% of respondents identified themselves as a minority. The most significant change in population has been the Black or African American population. The population increased from 8.9% of the population to 10.4% of the population.

While the DeKalb region remains predominately white, the area continues to see an influx on minority population in the area. While it cannot be assumed that these changes will affect transportation in the area, it is often true that minority populations are more willing to use public transportation, so with this demographic change, the DSATS area should continue its support of public transit expansion.

Map 2 illustrates the percent minority population by census block in 2010 for the DeKalb Metropolitan Area. Executive Order 12898 and the DOT and FWHA Orders on Environmental Justice address persons belonging to any of the following groups: Black, Asian, American Indian and Alaskan Native, Native Hawaiian or Other Pacific Islander, other races, and persons of two or more races. Figure 6 shows the distribution of races in the DSATS urbanized area as identified in the 2010 Census. Table 9 provides a percentage breakdown of those figures.
Higher than average concentration of minorities is focused around Northern Illinois University. The presence of a major university influences many minorities to live in the DeKalb region, which does increase minority population in the NIU area. Housing tends to be cheaper around the NIU campus to house many of the students. This, however, attracts many lower income residents who may be unable to afford housing in other parts of the city. This area is highly served by the NIU Huskie Lines. The focus of Huskie is to pick up students in the area and take them to the NIU Campus and the shopping areas along IL-23, however, Huskie bus routes are available to the public for .50 cents a ride. This area also has bus stops for the Fixed Route 18, which focuses its services on trips from lower income neighborhoods to shopping and medical facilities in the DeKalb region. The Fixed Route 23 also serves this area and provides trips to and from Kishwaukee College in Malta.

Table 9. Percentage of DSATS Population by Race (2010 Census)

<table>
<thead>
<tr>
<th>Population</th>
<th>DeKalb</th>
<th>Sycamore</th>
<th>Sycamore County</th>
<th>DeKalb County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>31,905</td>
<td>100.0%</td>
<td>7,975</td>
<td>100.0%</td>
</tr>
<tr>
<td>White</td>
<td>22,284</td>
<td>70.0%</td>
<td>6,376</td>
<td>80.0%</td>
</tr>
<tr>
<td>Minority</td>
<td>9,621</td>
<td>29.9%</td>
<td>1,599</td>
<td>20.0%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>9,627</td>
<td>30.0%</td>
<td>469</td>
<td>6.0%</td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td>262</td>
<td>0.8%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Asian</td>
<td>179</td>
<td>0.5%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other</td>
<td>1,059</td>
<td>3.3%</td>
<td>91</td>
<td>1.2%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1,111</td>
<td>3.5%</td>
<td>208</td>
<td>2.6%</td>
</tr>
</tbody>
</table>
DSATS Persons of Hispanic Origin

Table 10. Percentage of DSATS Population of Hispanic Origin

As of the 2010 Census approximately 11% of the population in the DeKalb Urbanized Area was Hispanic, with the majority of the population being of Mexican origin. The Hispanic population saw a significant increase in population between 1990 and the 2006-2008 ACS, increasing by over 300%, and as a percentage of the population rose from 3.6% in 1990 to 10.6% in the 2006-08 ACS. Part of the large increase between 1990 and 2000 may be attributed to the change in the way Hispanic Origin was classified as identified above. Map 3 illustrates the percent Hispanic population by census block in 2010 for the DeKalb Metropolitan Area.

The majority of the higher than average Hispanic population lives near Illinois State Route 23, which runs north-south through DeKalb and Sycamore. The majority of this area has nearby access to Fixed Routes 18 and 21. These areas also have Huskie Line routes which serve the DeKalb region to the Northern Illinois University campus and the Fixed Route 23, which takes students from various locations in DeKalb to Kishwaukee College in Malta.

<table>
<thead>
<tr>
<th>Population</th>
<th>DeKalb Count</th>
<th>Sycamore Count</th>
<th>Cortland Count</th>
<th>DSATS Urbanized Planning Boundary DeKalb Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>31,955</td>
<td>9,755</td>
<td>4,286</td>
<td>72,642</td>
</tr>
<tr>
<td>Non Hispanic or Latino</td>
<td>27,873</td>
<td>9,220</td>
<td>3,631</td>
<td>64,300</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>4,082</td>
<td>535</td>
<td>655</td>
<td>8,342</td>
</tr>
<tr>
<td>Mexican</td>
<td>4,550</td>
<td>591</td>
<td>436</td>
<td>6,223</td>
</tr>
<tr>
<td>Puerto Rican</td>
<td>315</td>
<td>30</td>
<td>40</td>
<td>465</td>
</tr>
<tr>
<td>Cuban</td>
<td>72</td>
<td>32</td>
<td>7</td>
<td>113</td>
</tr>
<tr>
<td>Dominican</td>
<td>17</td>
<td>1</td>
<td>5</td>
<td>21</td>
</tr>
<tr>
<td>Central American (Excluding Mexican)</td>
<td>12</td>
<td>14</td>
<td>16</td>
<td>30</td>
</tr>
<tr>
<td>South American</td>
<td>140</td>
<td>30</td>
<td>15</td>
<td>155</td>
</tr>
<tr>
<td>Other Hispanic or Latino</td>
<td>276</td>
<td>60</td>
<td>15</td>
<td>370</td>
</tr>
</tbody>
</table>

City values were calculated using blocks whose centroid resided in the corporate boundary.
Map 3. DSATS Area Hispanic Population
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Household Income (in 2017 Inflation Adjusted Dollars)</td>
<td>$56,891 NA</td>
<td>$47,948 NA</td>
<td>$53,524.59 NA</td>
<td>$5,576.59 11.6%</td>
</tr>
<tr>
<td>Household by Household Type</td>
<td>19,610 NA</td>
<td>24,726 NA</td>
<td>28,710 NA</td>
<td>$3,984 16.1%</td>
</tr>
<tr>
<td>Family households</td>
<td>10,920 55.7%</td>
<td>13,528 54.7%</td>
<td>-100%</td>
<td></td>
</tr>
<tr>
<td>Nonfamily Households</td>
<td>8,690 44.3%</td>
<td>11,198 45.3%</td>
<td>-100%</td>
<td></td>
</tr>
<tr>
<td>Average Household Size</td>
<td>2.5 2.5%</td>
<td>-</td>
<td>$0</td>
<td></td>
</tr>
<tr>
<td>Families:</td>
<td>11,035</td>
<td>13,528</td>
<td>15,014</td>
<td>$1,486 11%</td>
</tr>
<tr>
<td>Income in Below Poverty Level</td>
<td>724 6.6%</td>
<td>1,734 12.8%</td>
<td>2,008 13.37%</td>
<td>$274 15.8%</td>
</tr>
<tr>
<td>Married Couple Family: With Related Children Living Below Poverty Level</td>
<td>153 1.4%</td>
<td>414 3.1%</td>
<td>349 2.32%</td>
<td>-$65 -15.7%</td>
</tr>
<tr>
<td>Married Couple Family: No Children Under 18 Years</td>
<td>87 0.8%</td>
<td>105 0.8%</td>
<td>77 0.51%</td>
<td>-$28 -26.7%</td>
</tr>
<tr>
<td>Male Household, No Wife Present</td>
<td>27 0.2%</td>
<td>189 1.4%</td>
<td>265 1.77%</td>
<td>$76 40.2%</td>
</tr>
<tr>
<td>With Related Children Under 18 Years</td>
<td>0 0%</td>
<td>82 0.6%</td>
<td>188 1.25%</td>
<td>$106 129.3%</td>
</tr>
<tr>
<td>No Related Children Under 18 Years</td>
<td>27 0.2%</td>
<td>107 0.8%</td>
<td>77 0.51%</td>
<td>-$30 -28.0%</td>
</tr>
</tbody>
</table>
Table 12. Poverty Guidelines by Select Age Groups

<table>
<thead>
<tr>
<th>Persons in Family/Household</th>
<th>Poverty Guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$12,490</td>
</tr>
<tr>
<td>2</td>
<td>$16,910</td>
</tr>
<tr>
<td>3</td>
<td>$21,330</td>
</tr>
<tr>
<td>4</td>
<td>$25,750</td>
</tr>
<tr>
<td>5</td>
<td>$30,170</td>
</tr>
<tr>
<td>6</td>
<td>$34,590</td>
</tr>
<tr>
<td>7</td>
<td>$39,010</td>
</tr>
<tr>
<td>8</td>
<td>$43,430</td>
</tr>
<tr>
<td>8+</td>
<td>+ $4,420</td>
</tr>
</tbody>
</table>


Income and poverty levels are other indicators that can be used to identify areas of need for transportation services. Table 13 shows the median household income for the DeKalb Urbanized Area was $47,948 in 2013 inflation adjusted dollars. In terms of poverty in the DeKalb Urbanized Area, 14.4 percent of area households are considered to below the poverty threshold, during the 2008-12 ACS estimate period. The poverty threshold varies by household size, composition and age, but is based on a set income level for each set of characteristics. In the DeKalb Urbanized Area, the median household income has decreased 11.6% percent from Census 2000 to 2008-12 ACS (in 2013 inflation adjusted dollars). Nearly 13 percent of families with children under 18 years of age had an estimated income below the 2012 Census poverty threshold. Family households are slightly higher than non-family households (54.7 percent versus 45.3 percent), but female heads of households (living with relatives, living with non-relatives or living alone) make up 8.47 percent of those in poverty in the urban area. 2008-12 ACS estimates indicate that female heads of households with children in poverty increased by 497 (119%) since Census 2000, as shown in Table 13.

Poverty levels for various family sizes are presented in Table 14. Just over three percent of the households in the DSATS region reported having incomes less than $11,670. Most of the below poverty
households are located in what is considered to be NIU student housing, which can be a factor as to why below poverty households are congregated in this area. However, as rental costs tend to be cheaper in this area, it is also more affordable for lower-income family households. Just over 27 percent population reported earnings between $11,670 and $50,000. Median incomes in these Census block groups ranged from an estimated low of $8,646 to a high of $100,468 in the DeKalb Urbanized Area.

In households with a single person head of family, it can make it more difficult to make ends meet and therefore, this population may be an area of concern. This is a population where it may be difficult to find transportation and therefore require more assistance, like using public transportation. A single head of family household may experience additional transportation burdens, such as have to get both themselves to work and their children to school or day care. This issue is made doubly difficult if they must rely on public transit for your travel. These issues must be considered when trying to improve transportation in the region.

**DSATS Zero Vehicle Households**

Access to a personal vehicle (car, van or truck) influences daily travel in the DeKalb Urbanized Area. The more limited access to a private automobile, the more reliant on public transportation an individual or household becomes. The US Census tracks vehicle ownership through the ACS. This statistic is reported in a number of analyses, the most direct being household size and vehicles available. For this analysis, the 2008-12 ACS estimates was used, as this is the best available data for the DeKalb Urban Area.

Based on the ACS 5-year estimate, 87.8 percent of workers 16 and over have access to at least one vehicle, with 2.3 percent estimated using public transportation. Overall, an estimated 8.1 percent households in the DeKalb Urbanized Area do not have access to a vehicle. Table 15 presents the distribution of zero vehicle households by the total number of household members. This analysis shows that one-person households in the DeKalb Urbanized Area are the group estimated to be the highest percentage without access to an automobile, at 31.1 percent. However, any household without access to a vehicle is likely to need transportation services, and households with two or more persons and one vehicle may be concerned about access to transportation.
Table 13. Percentage Access to Vehicle by Number of Household Members

<table>
<thead>
<tr>
<th>Number of Household Members</th>
<th>Estimate</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>22,672</td>
<td></td>
</tr>
<tr>
<td>0 Vehicle Available</td>
<td>1,677</td>
<td>7.4%</td>
</tr>
<tr>
<td>1 Vehicle Available</td>
<td>7,885</td>
<td>34.8%</td>
</tr>
<tr>
<td>2 Vehicle Available</td>
<td>1,607</td>
<td>7.1%</td>
</tr>
<tr>
<td>3 Vehicle Available</td>
<td>10,500</td>
<td>46.3%</td>
</tr>
<tr>
<td>4 or More Vehicles Available</td>
<td>1,003</td>
<td>4.4%</td>
</tr>
<tr>
<td>1-Person Household</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Vehicle Available</td>
<td>747</td>
<td>3.3%</td>
</tr>
<tr>
<td>1 Vehicle Available</td>
<td>4,533</td>
<td>20.0%</td>
</tr>
<tr>
<td>2 Vehicle Available</td>
<td>592</td>
<td>2.6%</td>
</tr>
<tr>
<td>3 Vehicle Available</td>
<td>131</td>
<td>0.6%</td>
</tr>
<tr>
<td>4 or More Vehicles Available</td>
<td>10</td>
<td>0.0%</td>
</tr>
<tr>
<td>2-Person Household</td>
<td>7,704</td>
<td>34.0%</td>
</tr>
<tr>
<td>No Vehicle Available</td>
<td>510</td>
<td>2.2%</td>
</tr>
<tr>
<td>1 Vehicle Available</td>
<td>1,761</td>
<td>7.8%</td>
</tr>
<tr>
<td>2 Vehicle Available</td>
<td>4,555</td>
<td>20.1%</td>
</tr>
<tr>
<td>3 Vehicle Available</td>
<td>121</td>
<td>0.5%</td>
</tr>
<tr>
<td>4 or More Vehicles Available</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>3-Person Household</td>
<td>3,620</td>
<td>16.0%</td>
</tr>
<tr>
<td>No Vehicle Available</td>
<td>257</td>
<td>1.1%</td>
</tr>
<tr>
<td>1 Vehicle Available</td>
<td>729</td>
<td>3.2%</td>
</tr>
<tr>
<td>2 Vehicle Available</td>
<td>1,350</td>
<td>6.0%</td>
</tr>
<tr>
<td>3 Vehicle Available</td>
<td>1,159</td>
<td>5.1%</td>
</tr>
<tr>
<td>4 or More Vehicles Available</td>
<td>125</td>
<td>0.6%</td>
</tr>
<tr>
<td>4 or More Person Household</td>
<td>5,335</td>
<td>23.5%</td>
</tr>
<tr>
<td>No Vehicle Available</td>
<td>163</td>
<td>0.7%</td>
</tr>
<tr>
<td>1 Vehicle Available</td>
<td>862</td>
<td>3.8%</td>
</tr>
<tr>
<td>2 Vehicle Available</td>
<td>2,233</td>
<td>9.8%</td>
</tr>
<tr>
<td>3 Vehicle Available</td>
<td>1,330</td>
<td>5.9%</td>
</tr>
<tr>
<td>4 or More Vehicles Available</td>
<td>747</td>
<td>3.3%</td>
</tr>
</tbody>
</table>

*2017 5 year ACS - census tract level

DSATS Languages Spoken at Home

From signage to reading public transit schedules, persons and households whose primary language is not English may have difficult accessing alternate forms of transportation or reading signs. The federal government has stated MPOs should make an effort to identify the types of languages people speak in the region and how to provide outreach to them. DSATS will make efforts to communicate with those who need transportation assistance.

In reviewing the 2008-12 ACS, about 14 percent of the households in the region are considered linguistically isolated. This means that there is generally no one in the household can speak English and/or that no one in the household is available to translate for other members in the household. The majority of non-English speakers in the area speak Spanish (around 7 percent). About 4 percent of the population speaks Indo-European language, with around 2 percent speaking Asian languages. Table 16
shows the distribution languages spoken in the DeKalb Urbanized Area and the estimated percent of households that are linguistically isolated.

Table 14. Language Spoken Population & Linguistically Isolated Households

<table>
<thead>
<tr>
<th>Language Spoken Region</th>
<th>Total Population</th>
<th>Total HH</th>
<th>Percent of HH’s Speaking</th>
<th>Linguistically Isolated HH’s</th>
<th>Estimated Percent Isolated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Identified Population</td>
<td>68,379</td>
<td>27,810</td>
<td>100.0%</td>
<td>451</td>
<td>1.6%</td>
</tr>
<tr>
<td>Speak Only English</td>
<td>58,771</td>
<td>24,011</td>
<td>86.3%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>5,132</td>
<td>1,916</td>
<td>6.3%</td>
<td>25</td>
<td>0.9%</td>
</tr>
<tr>
<td>Indo-European Languages</td>
<td>2,204</td>
<td>1,114</td>
<td>40.0%</td>
<td>86</td>
<td>0.3%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island Languages</td>
<td>1,300</td>
<td>510</td>
<td>2.1%</td>
<td>68</td>
<td>0.2%</td>
</tr>
<tr>
<td>Other and Unspecified Languages</td>
<td>882</td>
<td>255</td>
<td>0.6%</td>
<td>38</td>
<td>0.1%</td>
</tr>
</tbody>
</table>

DSATS Senior Population

Senior citizens face special transportation challenges and as the baby boomer generation enter into retirement age, those challenges only intensify. As people age, many find it more difficult to operate their vehicles, they often require many more trips to medical facilities, and overall want just as much access to entertainment and shopping opportunities as others. Most seniors are on fixed incomes and can face situations where it may be either buying needed medications or buying food. These are situations many low income residents face. In the DSATS area, the majority of transit riders are senior citizens, and over the years, the need for transportation via MedVAC and other paratransit services has steadily increased.

As indicated from Table 15, around 14.3% of the population is age 60 or above, with the majority of seniors under the age of 74. While the US population as a whole is more mobile than it used to be, the majority of seniors tend to remain in the communities they have lived in. It can be expected that in DeKalb, as everywhere else, the percentage of seniors will only increase. This will mean more demand to trips to medical facilities, many of which are located in the Rockford and Chicago metropolitan areas. As this population tends to be very politically active, it can be anticipated that there will be more calls to expand transportation services, which means greater investments in transit by the local communities.
Persons with disabilities face special challenges when using transportation. For those with physical disabilities, vehicles need to fit to allow use of specialized transportation devices, such as wheel chairs. If a person is using public transit, it is important that sidewalks or trails are available, and curb cuts are needed at intersections to allow persons to cross streets. Persons with sensory disabilities may need alternative devices. For blind residents, it is helpful to have audio alerts to indicate when persons can cross the street or the departure stop is arriving. Rumble strips at intersection crosscuts and transit stops, provide a physical alert that they are about to cross into a dangerous area. Providing information in Braille and setting up websites with audio alerts can also be helpful. For those with audio disabilities, large readable signs are important. Transit systems should also allow guide animals who help persons with disabilities. Often, those with disabilities have assistants who help them travel, and it is common practice to allow assistants to ride for the same price as the disabled person.

In the DeKalb urbanized area, there is an estimated 6.9 percent of the population that have one or more disabilities according to 2008-12 ACS as shown in Table 18. DSATS member organizations have adopted a policy that part of any roadway rehabilitation shall include sidewalk upgrades when the cost of such improvements is less than 20 percent. In areas where there is heavy pedestrian traffic, pedestrian walk lights have been installed that count down how much time is left before the red. This gives slower moving persons a better indication if they have enough time to cross the entire road.
Environmental Justice Populations

The focus of the Federal Environmental Justice requirements (i.e. executive order 12898) is to ensure that the impact to minority populations, low-income populations, and others facing special circumstances, are considered during any planning effort to mitigate undue burdens. When improving and expanding the transportation systems in the DSATS region, the following questions should be asked:

- **Will a transportation project unduly affect a minority community more than other areas?** This question is asked because in the past sometimes new roadways were built through minority communities as it was cheaper to acquire right-of-way or condemn property in those communities. When building new roadways or improving existing ones, DSATS highly recommends that projects in all neighborhoods look towards transportation improvements such as improved sidewalks, trails, and ADA access (see below).

- **Does a transportation project include installation or rehabilitation of sidewalks, and the installation of curb cuts according to ADA standards?** Insufficient sidewalks can be the biggest hindrance to transportation access for those who have physical or sensory disabilities. DSATS and its member organizations shall look to improve the walkability of all neighborhoods when implementing transportation projects.

- **Does the transit system serve those with special challenges?** Often lower-income and minority communities are more dependent on public transit. However, if there is not sufficient access to public transit within walking distance, these populations may have limited options to get to needed services like medical appointments and shopping facilities. DSATS and its member organizations work with VAC to ensure service in or near disadvantaged neighborhoods to the major medical and shopping centers in the region. DSATS, its member organizations, and VAC should continue to improve the advertisement of their services to disadvantaged communities. It should also be advertised that all buses will deviate from their routes to pick up and drop off riders in areas not directly on the bus routes. Paratransit door-to-door services are also provided to anyone who needs such services.

### Table 16. Percentage of Residents with Disabilities

<table>
<thead>
<tr>
<th>Subject</th>
<th>Total Civilian Non-Institutionalized</th>
<th>DSATS Urbanized Planning Area (2017)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>With a Disability</td>
</tr>
<tr>
<td>Total Civilian Non-Institutionalized</td>
<td>72,039</td>
<td>6,513</td>
</tr>
<tr>
<td>Population Under 5 Years</td>
<td>4,403</td>
<td>54</td>
</tr>
<tr>
<td>With Hearing Difficulty</td>
<td>(X) 34</td>
<td></td>
</tr>
<tr>
<td>With a Vision Difficulty</td>
<td>(X) 20</td>
<td></td>
</tr>
<tr>
<td>Population 5-17 Years</td>
<td>11,223</td>
<td>1,234</td>
</tr>
<tr>
<td>With a Hearing Difficulty</td>
<td>(X) 73</td>
<td></td>
</tr>
<tr>
<td>With a Vision Difficulty</td>
<td>(X) 837</td>
<td></td>
</tr>
<tr>
<td>With a Cognitive Difficulty</td>
<td>(X) 505</td>
<td></td>
</tr>
<tr>
<td>With an Ambulatory Disability</td>
<td>(X) 3</td>
<td></td>
</tr>
<tr>
<td>With a Self-Care Disability</td>
<td>(X) 16</td>
<td></td>
</tr>
<tr>
<td>Population 18 to 64 Years</td>
<td>49,523</td>
<td>11,388</td>
</tr>
<tr>
<td>With a Hearing Difficulty</td>
<td>(X) 5,462</td>
<td></td>
</tr>
<tr>
<td>With a Vision Difficulty</td>
<td>(X) 837</td>
<td></td>
</tr>
<tr>
<td>With a Cognitive Difficulty</td>
<td>(X) 1,964</td>
<td></td>
</tr>
<tr>
<td>With an Ambulatory Disability</td>
<td>(X) 1,440</td>
<td></td>
</tr>
<tr>
<td>With a Self-Care Disability</td>
<td>(X) 611</td>
<td></td>
</tr>
<tr>
<td>With an Independent Living Disability</td>
<td>(X) 1,274</td>
<td></td>
</tr>
<tr>
<td>Population 65 Years and Over</td>
<td>7,050</td>
<td>4,684</td>
</tr>
<tr>
<td>With a Hearing Difficulty</td>
<td>(X) 376</td>
<td></td>
</tr>
<tr>
<td>With a Vision Difficulty</td>
<td>(X) 358</td>
<td></td>
</tr>
<tr>
<td>With a Cognitive Difficulty</td>
<td>(X) 544</td>
<td></td>
</tr>
<tr>
<td>With an Ambulatory Disability</td>
<td>(X) 1,537</td>
<td></td>
</tr>
<tr>
<td>With a Self-Care Disability</td>
<td>(X) 397</td>
<td></td>
</tr>
<tr>
<td>With an Independent Living Disability</td>
<td>(X) 872</td>
<td></td>
</tr>
</tbody>
</table>
Does the area have a large population of residents who have limited English abilities? DSATS has a rather small population of limited English proficiency, but the population keeps growing. VAC provides transit schedules in both Spanish and English to serve those with limited English skills. VAC and Transdev Services Inc also contracts with LanguageLine, to allow drivers or dispatchers to call LanguageLine to provide translation services between dispatchers/drivers and the persons having limited English skills.

Are the transportation needs of the elderly being served? As the senior population continues to grow, there are a number of issues to consider:

- Does public transit sufficiently serve the area Nursing Homes and Assisted Living Communities?
- Older citizens often need much more medical services which can be far away (i.e. Alzheimer’s clinic in Rockford, Veterans Hospitals in metropolitan Chicago). These often include long trips and leave vehicles dedicated to trips far outside the area, which can leave much larger dead-head times. These kind of expensive trips can be expected to increase as the baby boomer generation ages.
- Large visible signage on transportation routes is important as often elderly eyesight becomes degraded. Investments may need to be made to update signage in order to be more visible.
- Many more persons are living into their eighties and nineties. As people of this age typically have infirmities that prevent them from driving on their own. Will there be sufficient funding in 10 or 20 years to serve this demand?
- VAC provides free rides to all seniors and disabled residents in DeKalb County. As a human service agency they also provide meals on wheels services (these services are separate from the transit services and no federal transit funds are used for meals on wheels programs).

How well are those people the poverty level being served? Persons in poverty are often those who are identified elsewhere, such as many in minority communities, single head of households, elderly, and the disabled. Beside your home, transportation is often the second largest expense of any household. For this reason, lower income and poverty households are especially dependent on public transit. Some issues of consideration include:

- Can you get your child to day care or school and then yourself to work using transit?
- Is there access to larger metropolitan areas using transit? Greyhound recently dropped its stop in DeKalb which goes to downtown Chicago. Currently there is no transit that can get you to the Chicago Metra system or up to Rockford beyond the VAC paratransit system.
- Can children use transit? NIU students can ride transit free, and K-12 aged students can ride the fixed route transit buses for .25 cents. Efforts to teach children how to use public transit often lead to a lifetime of public transit use.
- Are there discounts for lower income persons? Most transit systems provide free or discounted transit to seniors, disabled, and those on Medicaid but frequently provide no discounts to persons of lower income or under the poverty level.
- VAC provides free transit service to all senior and disabled persons and provides highly discounted trips for all others. For persons who identifying themselves has having difficulty in paying, drivers are provided leeway in deciding whether to charge those persons.
As identified here, there are many transportation issues to be considered, and this list is far from comprehensive. DSATS encourages those who provide, or maintain the transportation systems in the DeKalb region to consider these issues as they improve the transportation system.
Appendix A: TITLE VI SIGNAGE

Figure 8. VAC Title VI Announcement (English)

YOUR PUBLIC RIGHTS UNDER TITLE VI

THE CITY OF DEKALB / VOLUNTARY ACTION CENTER

- The City of DeKalb & the Voluntary Action Center (VAC) operates their programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of DeKalb.

- For more information on the City of DeKalb’s civil rights program, and the procedures to file a complaint, contact 815-748-2367; email brian.dickson@cityofdekalb.com; visit our website http://www.dsats.org; or visit our office at 223 S. 4th St., Suite A, DeKalb, IL 60115.

- For more information on VAC’s civil rights program, and the procedures to file a complaint, contact 815-758-3932, visit the website http://www.vacdk.com; or visit VAC’s offices at 1606 Bethany Rd., Sycamore, IL 60178.

- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Federal Transit Administration’s Office of Civil Rights, 200 West Adams St., Suite 320, Chicago, IL 60606, Phone: (312) 353-3770, no later than 180 days after the date of the alleged discrimination.

- If information is needed in another language, contact 815-758-3932.
Your Public Rights Under Title VI
The City of DeKalb

- The City of DeKalb operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of DeKalb.

- For more information on the City of DeKalb's civil rights program, and the procedures to file a complaint, contact 815-748-2370; email marcus.cox@cityofdekalb.com; or visit www.cityofdekalb.com or visit City of DeKalb offices at 200 South Fourth St. DeKalb IL, 60115.

- A complaint may file a complaint directly with the Federal Transit Administration by filing a complaint with the Federal Transit Administration’s Office of Civil Rights, 200 West Adams St., Suite 320, Chicago, IL 60606, Phone: (312) 353-3770, no later than 180 days after the alleged discrimination.

- If information is needed in another language, contact 815-758-3932.
Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).

VAC and The City of DeKalb are committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the VAC Title VI Coordinator.

For more info call us at (815) 748-2367 and ask for the Title VI Coordinator
http://www.cityofdekalb.com/Engineering/DSATS/Reports/Plans/DBE.htm
KNOW YOUR RIGHTS

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).

VAC and The City of DeKalb are committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the VAC Title VI Coordinator.

For more info visit us at www.vacdk.com or call VAC at (815) 758-3932 and ask for the Title VI Coordinator.
Your Public Rights Under Title VI
Voluntary Action Center

- Voluntary Action Center operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Voluntary Action Center.

- For more information on the Voluntary Action Center’s civil rights program, and the procedures to file a complaint, contact 815-758-3932; or visit www.vacdck.com; or visit Voluntary Action Center’s offices at 1606 Bethany Rd., Sycamore, IL 60178.

- A complaint may file a complaint directly with the Federal Transit Administration by filing a complaint with the Federal Transit Administration’s Office of Civil Rights, 200 West Adams St., Suite 320, Chicago, IL 60606, Phone: (312) 353-3770, no later than 180 days after the alleged discrimination.

- If information is needed in another language, contact 815-758-3932
Know your Rights!

Title VI of The Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).

Transdev Services Inc is committed to practicing non-discrimination. If you believe you have been subjected to discrimination, you may file a complaint with the Title VI Officer.

For more information please call us at (815)-758-6900 and ask for the Title VI Officer. You may also visit www.huskieline.com for more information on Transdev’s policy and complaint procedures.
Your Public Rights Under Title VI
Transdev Services Inc

Transdev Services Inc operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Transdev Services Inc.

For more information on Transdev Services Inc.'s civil rights program, and the procedures to file a complaint, contact 815-758-4900; email Melissa.Orhwall@transdev.com; or visit www.huskieline.com or visit Transdev Services Inc.'s offices at 1825 Pleasant St. DeKalb IL, 60115.

A complaint may file a complaint directly with the Federal Transit Administration by filing a complaint with the federal Transit Administration’s Office of Civil Rights, 200 West Adams St., Suite 320, Chicago, IL 60606, Phone: (312) 253-5770, no later than 180 days after the alleged discrimination.

If information is needed in another language, contact 815-758-3932.
Appendix B: TITLE VI POLICY AND COMPLAINT PROCEDURES

CITY OF DEKALB ILLINOIS TITLE VI STATEMENT OF POLICY

The City of DeKalb and its public transit providers, the Voluntary Action Center of DeKalb County (VAC), and Transdev Services Inc, are committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible services. DeKalb and VAC recognize their responsibilities to the communities in which VAC operates. It is DeKalb and VAC’s policy to utilize its best efforts to assure that no person 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 its program of transit service delivery and related benefits.

Toward this end, our Title VI objectives are to:

A. Ensure that the level and quality of service is provided without regard to race, color, or national origin;
B. Identify and address, as appropriate, 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;
C. Promote the full and fair participation of all affected populations in service provision 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.

As Voluntary Action Center (VAC) and Transdev Services Inc provides service throughout DeKalb County, the City of DeKalb shall take the lead in implementing the program in the metropolitan DeKalb region (including the Cities of DeKalb and Sycamore and the Town of Cortland) and VAC shall take the lead in implementing the program in the rest of DeKalb County. Anyone who has a complaint or question may contact either the City of DeKalb, Transdev Services Inc, or the Voluntary Action Center. Staff at any agency shall determine who shall be in charge of leading any investigation.

At the City of DeKalb, the Transit Manager is responsible for the day-to-day operations of this program and will receive and investigate Title VI complaints which come through the complaint procedures. However, all managers, supervisors, and City employees who may deal with public transit share in the responsibility for making DeKalb’s Title VI Program a success. For more information about the City’s Title VI obligations and the complaint procedure can be obtained by going to the website: http://www.cityofdekalb.com/Engineering/DSATS/Reports/Plans/DBE.htm or by contacting the Transit Manager at (815) 748-2370.

At VAC, the Executive Director is responsible for the day-to-day operations of this Program and will receive and investigate Title VI complaints, which come through the complaint procedure. However, all managers, supervisors and employees share in the responsibility for making VAC’s Title VI Program a success. Additional information concerning VAC’s Title VI obligations and the complaint procedure can be obtained by contacting the Executive Director (815) 758-3932.
At Transdev Services Inc, the General Manager is responsible for the day-to-day operations of this Program and will receive and investigate Title VI complaints, which come through the complaint procedure. However, all managers, supervisors and employees share in the responsibility for making Transdev Services Inc's Title VI Program a success. Additional information concerning Transdev Services Inc’s Title VI obligations and the complaint procedure can be obtained by contacting the General Manager (815) 758-6900.

Staffs at the City of DeKalb and the Voluntary Action Center shall use the following criteria to determine who shall be the lead investigator:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of DeKalb</td>
<td>Any incidents or issues that occur at:</td>
</tr>
<tr>
<td></td>
<td>• City of DeKalb owned offices and properties</td>
</tr>
<tr>
<td></td>
<td>• All other complaints not easily attributed to any service or location</td>
</tr>
<tr>
<td>Voluntary Action Center</td>
<td>Any incidents or issues that occur at:</td>
</tr>
<tr>
<td></td>
<td>• VAC leased or owned offices or properties</td>
</tr>
<tr>
<td></td>
<td>• VAC paratransit bus trips</td>
</tr>
<tr>
<td></td>
<td>• All other complaints not easily attributed to any service or location</td>
</tr>
<tr>
<td>Transdev Services Inc.</td>
<td>Any incidents that occur at:</td>
</tr>
<tr>
<td></td>
<td>• Transdev Services Inc facility</td>
</tr>
<tr>
<td></td>
<td>• Huskie Line Fixed Routes</td>
</tr>
<tr>
<td></td>
<td>• All other complaints not easily attributed to any service or location</td>
</tr>
</tbody>
</table>

LIMITED ENGLISH PROFICIENCY POLICY STATEMENT AND AVAILABLE RESOURCES

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that certain federal grant recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). To that end, VAC provides translation and interpretation services free of charge upon request by calling (815) 758-3932.
APPENDIX C: TITLE VI COMPLAINTS

COMPLAINT PROCEDURES

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under the City of DeKalb or VAC’s programs or related benefits, you may file a complaint with either:

- For issues occurring on DeKalb owned property:
  - Transit Manager, 200 S. 4th St., DeKalb, IL 60115; Phone: (815) 748-2370

- For Riders on VAC’s paratransit vehicles, or at VAC offices:
  - VAC EEO Officer, Executive Director, 1606 Bethany Rd., Sycamore, IL 60178; Phone: (815) 758-3932.

- For Riders on Transdev Services Inc’s fixed route and deviated fixed route vehicles or facility:
  - General Manager, 1825 Pleasant St. DeKalb, IL 60115: Phone: (815) 758-6900.

- If you are unsure where to report the issue, contact either location and the staff’s at DeKalb, Transdev Services Inc or VAC will determine who should be the lead investigator of the complaint

- We highly encourage you to make your complaint in writing.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The DeKalb Transit Manager, Transdev Services Inc’s General Manager, or the VAC EEO Officer will review every complaint, and when necessary, assign a neutral party to investigate. Additionally, all complaints shall be reviewed by all organizations to ensure the proper organization is investigating the complaint. At a minimum the investigating officer will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation:

- If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately.
- The Complainant will also receive a final report together with any remedial steps taken.
- The investigation process and final report should take no longer than twenty-five (25) business days.
- For City of DeKalb Investigations:
  - The Transit Manager will complete a final report which will be submitted to the City Manager and the Mayor
  - For any incident occurring on a VAC bus, the EEO Officer shall agree to all remedial steps outlined by DeKalb staff. A copy of the final report shall also be submitted to the VAC Board of Directors.
  - For any incident occurring on a Transdev Services Inc bus, the General Manager shall agree to all remedial steps outlined by DeKalb staff. A copy of the final report shall also be submitted to the City of DeKalb staff.
If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the DeKalb City Manager, 200 S. 4th St, DeKalb, IL 60115. If legal proceedings are initiated, the City of DeKalb Attorney shall become the main contact for all subsequent interactions.

- For VAC Investigations:
  - The EEO Officer will complete a final report for the Board of Directors.
  - If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the VAC Board of Directors, 1606 Bethany Rd., Sycamore, IL 60178.
  - If legal proceedings are initiated, the VAC Attorney shall become the main contact for all subsequent interactions.

- For Transdev Services Inc Investigations:
  - The General Manager will complete a final report for the City of DeKalb Transit Staff.
  - If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the City of DeKalb Transit Staff, 200 South Fourth St., DeKalb, IL 60115.
  - If legal proceedings are initiated, the Transdev Services Inc Attorney shall become the main contact for all subsequent interactions.

Complaints may also be filed with the Federal Transit Administration’s Office of Civil Rights, no later than 180 days after the date of the alleged discrimination:

200 West Adams Street, Suite 320,
Chicago, Illinois 60606
Phone: (312) 353-3770

The investigative officer shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by either the City of DeKalb, Transdev Services Inc, or VAC in response to the complaint. Should the City of DeKalb, Transdev Services Inc, or VAC receive a Title VI complaint in the form of a formal charge or lawsuit, the agency’s attorney(s) shall be responsible for the investigation and maintaining a log as described herein.
Appendix D: City of DeKalb Title VI Complaint Form

The City of DeKalb/ Transdev Services Inc/ Voluntary Action Center of DeKalb County (VAC) are committed to ensuring no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 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 City of DeKalb Civil Rights Officer at (815) 748-2370. The completed form must be returned to The City of DeKalb, Civil Rights Officer, 200 S. 4th St, DeKalb, IL 60115.

Your Name: ___________________________________________________________________

Street Address: ________________________________________________________________

Phone: ____________________________ Alternate Phone: ___________________________

Person discriminated against (if someone other than complainant):

Name(s): _____________________________________________________________________

Street Address, City, State & Zip Code: ______________________________________________

Which of the following best describes the reason for the alleged discrimination that took place? (Check One)

☐ Race  ☐ Color  ☐ National Origin (Limited English Proficiency)

Date of Incident: __________________________________________________________________

Location of Incident (if known): __________________________________________________________________

Location where rider got on bus: __________________________________________________________________

(if known or applicable)
Please describe the alleged discrimination incident (attach additional pages if needed):

______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
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______________________________________________________________________________
______________________________________________________________________________
Have you filed a complaint with any other federal, state or local agencies? (check one)
☐ Yes / ☐ No

If so, list agency / agencies and contact information below:

_____________________________________________________________________________
Agency: Contact Name:
Street Address, City, State & Zip Code
_____________________________________________________________________________
Agency: Contact Name:
Street Address, City, State & Zip Code

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

_____________________________________________________________________________
Complainants Signature Date
Print or type name of complainant: ________________________________________________

Complaints may also be filed with the Federal Transit Administration’s Office of Civil Rights, no later than 180 days after the date of the alleged discrimination:

200 West Adams Street, Suite 320,
Chicago, Illinois 60606
Phone: (312) 353-3770

The investigative officer shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by either the City of DeKalb, Transdev Services Inc, or VAC in response to the complaint. Should the City of DeKalb, Transdev Services Inc, or VAC receive a Title VI complaint in the form of a formal charge or lawsuit, the agency’s attorney(s) shall be responsible for the investigation and maintaining a log as described herein.

For Office Use Only
Receiving Office:
Date Received: __________________________ Received By: ___________________________
Investigating Office:
Date Received: __________________________ Received By: ___________________________
CONOZCA SUS DERECHOS

SUS DERECHOS PÚBLICOS BAJO EL TITULO VI

LA CIUDAD DE DEKALB/ VOLUNTARY ACTION CENTER

- La ciudad de DeKalb y el Centro de acción voluntaria (VAC) operan sus programas y servicios sin importar la raza, color u origen nacional en conformidad con el Título VI de la Ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agravado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la ciudad de DeKalb.

- Para más información sobre el programa de derechos civiles de la ciudad de DeKalb, y los procedimientos para presentar una queja, llame al 815-748-2367; envíe correo electrónico a brian.dickson@cityofdekalb.com; visite nuestro sitio web en http://www.dsats.org; o visite nuestra oficina en 223 S. 4th St, Suite A, DeKalb, IL 60115.

- Para más información sobre el programa de derechos civiles de VAC, y los procedimientos para presentar una queja, llame al 815-758-3932, visíte el sitio web en http://www.vacdk.com; o visíte las oficinas del VAC en 1606 Bethany Rd., Sycamore, IL 60178.

- El reclamante puede presentar una queja directamente ante la Administración Federal de Tránsito al enviar la queja a la oficina de derechos civiles de la Federal Transit Agency, 200 West Adams St., Suite 320, Chicago, IL 60606, Teléfono: (312) 353-3770, a más tardar 180 días después de la fecha de la supuesta discriminación.

- Si necesita información en otro idioma, llame al 815-758-3932
CONOZCA SUS DERECHOS

EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964 prohíbe la discriminación por raza, u origen nacional en programas y actividades que reciben asistencia financiera federal (42 U.S.C. Section 2000d).

VAC y la ciudad de DeKalb se comprometen a practicar la no discriminación. Si usted cree que ha sido sometido a discriminación puede presentar una queja con el Coordinador de Título VI de VAC.

Para más información llámenos al (815) 748-2367 y pregunte por el Coordinador de Título VI.

http://www.cityofdekalb.com/Engineering/DSATS/Reports/Plans/DBE.htm
CONOZCA SUS DERECHOS

SUS DERECHOS PÚBLICOS BAJO EL TÍTULO VI
LA CIUDAD DE DEKALB/ VOLUNTARY ACTION CENTER/ TRANSDEV SERVICES INC.

- La ciudad de DeKalb, Transdev Services Inc y el Centro de acción voluntaria (VAC) operan sus programas y servicios sin importar la raza, color u origen nacional en conformidad con el Título VI de la Ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la ciudad de DeKalb.

- Para más información sobre el programa de derechos civiles de la ciudad de DeKalb, y los procedimientos para presentar una queja, llame al 815-748-2370; envíe correo electrónico a marcus.cox@cityofdekalb.com; visite nuestro sitio web en http://www.dsats.org; o visite nuestra oficina en 200 S. 4th St, DeKalb, IL 60115

- Para más información sobre el programa de derechos civiles de Transdev Services, y los procedimientos para presentar una queja, llame al 815-758-6900, visite el sitio web en http://www.huskieline.com; o visite las oficinas del Transdev Services Inc en 1825 Pleasant St., DeKalb, IL 60115

- El reclamante puede presentar una queja directamente ante la Administración Federal de Tránsito al enviar la queja a la oficina de derechos civiles de la Federal Transit Agency, 200 West Adams St., Suite 320, Chicago, IL 60606, Teléfono: (312) 353-3770, a más tardar 180 días después de la fecha de la supuesta discriminación.

- Si necesita información en otro idioma, llame al 815-758-3932
Conozca Sus Derechos

El Título de la ley de derechos civiles de 1964 prohíbe la discriminación por raza, origen nacional en programas y actividades que reciben asistencia financiera federal (42 U.S.C. Section 2000d). Transdev Services Inc, VAC y la ciudad de DeKalb se comprometen a practicar la no discriminación. Si usted cree que ha sido sometido a discriminación puede presentar una queja con el Coordinator De Titulp VI de VAC, Transit Manager de la ciudad de DeKalb y General Manager con Transdev Services Inc.
Figure 10. VAC Bus Signage – Paratransit (Spanish)

CONOZCA SUS DERECHOS

EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964 prohíbe la discriminación por raza, u origen nacional en programas y actividades que reciben asistencia financiera federal (42 U.S.C. Section 2000d).

VAC y la ciudad de DeKalb se comprometen a practicar la no discriminación. Si usted cree que ha sido sometido a discriminación puede presentar una queja con el Coordinador de Título VI de VAC.

Para más información visítenos en www.vacdk.com o llame al VAC al (815) 758-3932 y pregunte por el Coordinador de Título VI.
Voluntary Action Center of DeKalb County
Title VI
Declaracion de Politicia
(Statement of Policy)

Voluntary Action Center of DeKalb County (VAC) se ha comprometido a una política de no discriminación en el ejercicio de sus actividades, incluyendo sus responsabilidades Título VI - la prestación de servicios equitativos y accesibles. VAC reconoce sus responsabilidades a las comunidades en las que opera. Es política de VAC para utilizar sus mejores esfuerzos para asegurar que ninguna persona, por motivos de raza, color o origen nacional, ser excluido de participar en, ser negado los beneficios de, o ser objeto de discriminación en su programa de tránsito prestación de servicios y otras prestaciones conexas.

Con este fin, el objetivo de VAC a:

A. Asegúrese de que el nivel y la calidad del servicio prestado sin distinción de raza, color o origen nacional;
B. Identificar y abordar, como la salud humana adecuada y de gran forma desproporcionada y los efectos adversos y los efectos ambientales, incluyendo los efectos sociales y económicos de los programas y actividades en las poblaciones minoritarias y de bajos ingresos;
C. Promover la participación plena y equitativa de todas las poblaciones afectadas en la toma de prestación de servicios de decisiones;
D. Prevenir la denegación, reducción o retraso en los beneficios relacionados con los programas y actividades que beneficien a las poblaciones minoritarias o de bajos ingresos;
E. Garantizar un acceso significativo a los programas y actividades de las personas con habilidad limitada del Inglés.

La responsabilidad para llevar a cabo el compromiso de VAC a este programa ha sido delegada en el VAC Executive Director por el Consejo de Administración. El Executive Director es responsable de las operaciones del día a día de este programa y recibir e investigar las quejas Título VI, que vienen a través del procedimiento de denuncia. Sin embargo, todos los gerentes, supervisores y empleados comparten la responsabilidad de hacer el Título VI Programa VAC un éxito. Información adicional relativa al título de VAC obligaciones VI y el procedimiento de reclamación se pueden obtener poniéndose en contacto con el Executive Director (815) 758-3932.

LIMITADA DE INGLÉS DE RECURSOS DISPONIBLES Y DECLARACIÓN DE LA POLÍTICA

Título VI de la Ley de Derechos Civiles de 1964, 42 USC 2000d, et seq., establece que ninguna persona podrá ser objeto de discriminación por motivos de raza, color o origen nacional en cualquier programa o actividad que reciba asistencia financiera federal.

Título VI y sus reglamentos de aplicación exigen que determinados beneficiarios de las subvenciones federales tomar medidas responsables para garantizar un acceso significativo a los beneficios, servicios, información, y otras porciones importantes de sus programas y actividades para las personas que son Dominio Limitado del Inglés (LEP). A tal fin, VAC ofrece servicios de traducción e interpretación de forma gratuita bajo petición llamando al (815) 758-3932.
TÍTULO VI PROCEDIMIENTOS DE QUEJA

Si usted cree que han sido excluidos de la participación en, negar los beneficios de, o sujeto a discriminación por motivos de raza, color u origen nacional en programas de VAC o beneficios relacionados, usted puede presentar una queja con el VAC EEO Officer, Executive Director, 1606 Bethany Rd., Sycamore, IL 60178, o por teléfono (815) 758-3932. Le animamos a presentar su queja por escrito.

Todas las quejas serán investigadas de inmediato. medidas razonables se llevarán a cabo para preservar toda la información que es confidencial. El EEO Officer revisará todas las quejas, y cuando sea necesario, asignar una parte neutral para investigar. Como mínimo, el oficial investigador que:

- Identificar y revisar todos los documentos pertinentes, prácticas y procedimientos;
- Identificar y entrevistar a las personas con el conocimiento de la violación del Título VI, es decir, la persona que hace la denuncia, testigos o cualquier persona identificada por el demandante, cualquiera que hayan sido objeto de una actividad similar, o cualquier persona con información relevante.

Al término de la investigación, el EEO Officer completará un informe final al VAC Board of Directors. Si una violación del Título VI se encuentra a existir, medidas correctoras adecuadas y necesarias se adoptarán de inmediato. El demandante también recibirá un informe final con las medidas correctivas. El proceso de investigación y el informe final no debe tomar más de veinte y cinco días hábiles (25). Si no se encuentra violación y el autor desea apelar la decisión, él o ella puede apelar directamente a la VAC Board of Directors, President, 1606 Bethany Rd., Sycamore, IL 60178.

Las quejas también se pueden presentar en la Federal Transit Administartion’s Office of Civil Rights, a más tardar 180 días después de la fecha de la supuesta discriminación:
   200 West Adams Street, Suite 320
   Chicago, Illinois 60606
   Teléfono: (312) 353-3770

El EEO Officer deberá mantener un registro del título VI recibió denuncias de este proceso de registro que deberá incluir la fecha de presentación de la denuncia, un resumen de los alegatos, la situación de la denuncia y las medidas adoptadas por Pace en respuesta a la queja. En caso de VAC recibir una queja del Título VI en la forma de una acusación formal o juicio, el abogado de VAC será responsable de la investigación y el mantenimiento de un registro como se describe en este documento.
Transdev Services Inc se ha comprometido a una política de no discriminación en el ejercicio de sus actividades, incluyendo sus responsabilidades Título VI - la prestación de servicios equitativos y accesibles. Transdev Services Inc reconoce sus responsabilidades a las comunidades en las que opera. Es política de Transdev Services Inc para utilizar sus mejores esfuerzos para asegurar que ninguna persona, por motivos de raza, color u origen nacional, ser excluido de participar en, ser negado los beneficios de, o ser objeto de discriminación en su programa de tránsito prestación de servicios y otras prestaciones conexas.

Con este fin, el objetivo de Transdev Services Inc a:

F. Asegúrese de que el nivel y la calidad del servicio prestado sin distinción de raza, color u origen nacional;

G. Identificar y abordar, como la salud humana adecuada y de gran forma desproporcionada y los efectos adversos y los efectos ambientales, incluyendo los efectos sociales y económicos de los programas y actividades en las poblaciones minoritarias y de bajos ingresos;

H. Promover la participación plena y equitativa de todas las poblaciones afectadas en la toma de prestación de servicios de decisiones;

I. Prevenir la denegación, reducción o retraso en los beneficios relacionados con los programas y actividades que beneficien a las poblaciones minoritarias o de bajos ingresos;

J. Garantizar un acceso significativo a los programas y actividades de las personas con habilidad limitada del Inglés.

La responsabilidad para llevar a cabo el compromiso de Transdev Services Inc a este programa ha sido delegada en el Transdev Services Inc General Manager por el Consejo de Administración. El General Manager es responsable de las operaciones del día a día de este programa y recibir e investigar las quejas Título VI, que vienen a través del procedimiento de denuncia. Sin embargo, todos los gerentes, supervisores y empleados comparten la responsabilidad de hacer el Título VI Programa Transdev Services Inc un éxito. Información adicional relativa al título de Transdev Services Inc obligaciones VI y el procedimiento de reclamación se pueden obtener poniéndose en contacto con el General Manager (815) 758-6900.

LIMITADA DE INGLÉS DE RECURSOS DISPONIBLES Y DECLARACIÓN DE LA POLÍTICA
Título VI de la Ley de Derechos Civiles de 1964, 42 USC 2000d, et seq., establece que ninguna persona podrá ser objeto de discriminación por motivos de raza, color u origen nacional en cualquier programa o actividad que reciba asistencia financiera federal.

Título VI y sus reglamentos de aplicación exigen que determinados beneficiarios de las subvenciones federales tomar medidas responsables para garantizar un acceso significativo a los beneficios,
servicios, información, y otras porciones importantes de sus programas y actividades para las personas que son Dominio Limitado del Inglés (LEP). A tal fin, Transdev Services Inc ofrece servicios de traducción e interpretación de forma gratuita bajo petición llamando al (815) 758-6900.

TÍTULO VI PROCEDIMIENTOS DE QUEJA

Si usted cree que han sido excluidos de la participación en, negar los beneficios de, o sujeto a discriminación por motivos de raza, color o origen nacional en programas de Transdev Services Inc o beneficios relacionados, usted puede presentar una queja con el Transdev Services Inc EEO Officer, General Manager, 1825 Pleasant St., DeKalb, IL 60115, o por teléfono (815) 758-6900. Le animamos a presentar su queja por escrito.

Todas las quejas serán investigadas de inmediato. medidas razonables se llevarán a cabo para preservar toda la información que es confidencial. El EEO Officer revisará todas las quejas, y cuando sea necesario, asignar una parte neutral para investigar. Como mínimo, el oficial investigador que:

- Identificar y revisar todos los documentos pertinentes, prácticas y procedimientos;
- Identificar y entrevistar a las personas con el conocimiento de la violación del Título VI, es decir, la persona que hace la denuncia, testigos o cualquier persona identificada por el demandante, cualquiera que hayan sido objeto de una actividad similar, o cualquier persona con información relevante.

Al término de la investigación, el EEO Officer completará un informe final al City of DeKalb Transit Staff. Si una violación del Título VI se encuentra a existir, medidas correctoras adecuadas y necesarias se adoptarán de inmediato. El demandante también recibirá un informe final con las medidas correctivas. El proceso de investigación y el informe final no debe tomar más de veinte y cinco días hábiles (25). Si no se encuentra violación y el autor desea apelar la decisión, él o ella puede apelar directamente a la City of DeKalb Transit Staff, Transit Manager, 200 South Fourth St., DeKalb, IL 60115.

Las quejas también se pueden presentar en la Federal Transit Administartion’s Office of Civil Rights, a más tardar 180 días después de la fecha de la supuesta discriminación:

200 West Adams Street, Suite 320
Chicago, Illinois 60606
Teléfono: (312) 353-3770

El EEO Officer deberá mantener un registro del título VI recibió denuncias de este proceso de registro que deberá incluir la fecha de presentación de la denuncia, un resumen de los alegatos, la situación de la denuncia y las medidas adoptadas por Pace en respuesta a la queja. En caso de Transdev Services Inc recibir una queja del Título VI en la forma de una acusación formal o juicio, el abogado de Transdev Services Inc será responsable de la investigación y el mantenimiento de un registro como se describe en este documento.
Ciudad de DeKalb Illinois  
Formulario de queja de Título VI

La ciudad de DeKalb/ Transdev Services Inc / Voluntary Action Center de DeKalb County (VAC) se comprometen a garantizar que ninguna persona se excluye de la participación en o se excluye los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el Título VI de la Ley de derechos civiles de 1964, y sus enmiendas. Las quejas relacionadas con el Título VI deben presentarse dentro de 180 días desde la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, póngase en contacto con el oficial de derechos civiles de la ciudad de DeKalb al (815) 748-2370. Devuelva el formulario a: The City of DeKalb, Civil Rights Officer, 200 S. 4th St, DeKalb, IL 60115.

Su nombre: ___________________________________________________________________

Dirección: ___________________________________________________________________

Teléfono: ____________________________ Otro teléfono: _____________________________

Persona discriminada (si no es la persona que presenta la queja):
Nombre(s): ______________________________________________________________________

Dirección, ciudad, estado y código postal:
____________________________________________________________________________

¿Cuál de las siguientes mejor describe la razón de la supuesta discriminación que ocurrió? (Marque una)

Raza  Color  Origen nacional (habilidad limitada en inglés)

Fecha del incidente: ______________________________________________________________

Ubicación del incidente (si lo conoce): _____________________________________________

Ubicación donde el pasajero subió al en autobús: __________________________________
(si se conoce o es aplicable)
Por favor, describa el incidente de la supuesta discriminación (adjunte páginas adicionales si es necesario):

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¿Se presentó una queja con otras agencias federales, estatales o locales? (marque uno)

Sí / No

Si es así, indique la(s) agencia(s) y su información de contacto a continuación:

<table>
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<th>Agencia:</th>
<th>Nombre de contacto:</th>
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Dirección, ciudad, estado y código postal

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<th>Agencia:</th>
<th>Nombre de contacto:</th>
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Dirección, ciudad, estado y código postal

_Afirmo que he leído el cargo anterior y que es cierto según mi leal saber y entender._

_Firma del reclamante_

Nombre del reclamante, en letra de molde o a máquina: _______________________________

Las quejas pueden también presentarse a la Oficina de derechos civiles de la Federal Transit Administration, a más tardar 180 días después de la fecha de la supuesta discriminación:

   Federal Transit Administration
   Office of Civil Rights
   200 West Adams Street, Suite 320,
   Chicago, Illinois 60606
   Teléfono: (312) 353-3770

El oficial de investigación deberá mantener un registro de quejas del Título VI recibidas de este proceso que deberá incluir la fecha en que se presentó la denuncia, un resumen de las acusaciones, el estado de la queja y las medidas adoptadas por la ciudad de DeKalb, Transdev Services Inc o VAC en respuesta a la queja. Si la ciudad de DeKalb, Transdev Services Inc o VAC reciben una queja del Título VI en forma de un cargo formal o pleito, los abogados de la agencia serán responsables de la investigación y de mantener un registro como se describe en este documento.

__Para uso exclusivo de la oficina__

Receiving Office:
   Date Received: ___________________________ Received By: ___________________________

Investigating Office:
   Date Received: ___________________________ Received By: ___________________________
La ciudad de DeKalb/Transdev Services Inc/Voluntary Action Center de DeKalb County (VAC) se comprometen a garantizar que ninguna persona se excluye de la participación en o se excluye los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el Título VI de la Ley de derechos civiles de 1964, y sus enmiendas. Las quejas relacionadas con el Título VI deben presentarse dentro de 180 días desde la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, póngase en contacto con el oficial de derechos civiles de la ciudad de DeKalb al (815) 748-2370. Devuelva el formulario a: The City of DeKalb, Civil Rights Officer, 200 S. 4th St, DeKalb, IL 60115.

Su nombre: ___________________________________________________________________

Dirección: ____________________________________________________________________

Teléfono: ____________________________ Otro teléfono: _____________________________

Persona discriminada (si no es la persona que presenta la queja):

Nombre(s): ______________________________________________________________________

Dirección, ciudad, estado y código postal: ____________________________________________

¿Cuál de las siguientes mejor describe la razón de la supuesta discriminación que ocurrió? (Marque una)

- Raza
- Color
- Origen nacional (habilidad limitada en inglés)

Fecha del incidente: ________________________________________________________________

Ubicación del incidente (si lo conoce): _______________________________________________

Ubicación donde el pasajero subió al en autobús: ___________________________________

(si se conoce o es aplicable)
Por favor, describa el incidente de la supuesta discriminación (adjunte páginas adicionales si es necesario):

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¿Se presentó una queja con otras agencias federales, estatales o locales? (marque uno)

☐ Sí  /  ☐ No

Si es así, indique la(s) agencia(s) y su información de contacto a continuación:

______________________________________________________________________________
Agencia: Nombre de contacto:

______________________________________________________________________________
Dirección, ciudad, estado y código postal

______________________________________________________________________________
Agencia: Nombre de contacto:

______________________________________________________________________________
Dirección, ciudad, estado y código postal

**Afirme que he leído el cargo anterior y que es cierto según mi leal saber y entender.**

**Firma del reclamante**

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**Para uso exclusivo de la oficina**

Receiving Office:
Date Received: __________________________ Received By: ___________________________

Investigating Office:
Date Received: __________________________ Received By: ___________________________

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Appendix F: Definitions

All definitions in chapter 53 of title 49, United States Code, and in 49 CFR part 21 apply to this Circular, as well as the following definitions:

a. **Applicant** means a person or entity that submits an application, request, or plan required to be approved by the FTA Administrator or by a primary recipient, as a condition of eligibility for financial assistance from the FTA, and “application” means such an application, request, or plan.

b. **Demand response system**: Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.

c. **Designated recipient** means an entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.

d. **Direct recipient** means an entity that receives funding directly from the FTA. For purposes of this Circular, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

e. **Discrimination** refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

f. **Disparate impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

g. **Disproportionate burden** refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

h. **Disparate treatment** refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

i. **DSATS** refers to the DeKalb-Sycamore Area Transportation Study. The Metropolitan Planning Organization (MPO) for the DeKalb Illinois Urbanized Area.

j. **Fixed guideway** means a public transportation facility—using and occupying a separate right-of-way for the exclusive use of public transportation; using rail; using a fixed catenary system; for a passenger ferry system; or for a bus rapid transit system.
k. **Fixed route** refers to public transportation service provided in vehicles operated along predetermined routes according to a fixed schedule.

l. **Federal financial assistance** refers to
   1) grants and loans of Federal funds;
   2) the grant or donation of Federal property and interests in property;
   3) the detail of Federal personnel;
   4) 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 any Federal agreement, arrangement, or other contract that has as one of its purposes;
   5) the provision of assistance.

m. **Limited English Proficient (LEP) persons** refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

n. **Low-income person** means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: “refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved” or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

o. **Low-income population** refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

p. **Metropolitan planning organization (MPO)** means the policy board of an organization created and designated to carry out the metropolitan transportation planning process.

q. **Metropolitan transportation plan (MTP)** means the official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the MPO through the metropolitan transportation planning process.

r. **Minority persons** include the following:
   1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
   2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
4) Hispanic or Latino persons, includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
s. Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.
t. Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.
u. National origin means the particular nation in which a person was born, or where the person’s parents or ancestors were born.
v. Noncompliance refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient’s program or activity on the basis of race, color, or national origin.
w. Non-profit organization: A corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization.
x. Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient’s service area.
y. Primary recipient means any FTA recipient that extends Federal financial assistance to a subrecipient.
z. Provider of fixed route public transportation (or “transit provider”) means any entity that operates public transportation service, and includes States, local and regional entities, and public and private entities. This term is used in place of “recipient” in chapter IV and is inclusive of direct recipients, primary recipients, designated recipients, and subrecipients that provide fixed route public transportation service.
aa. Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intrafacility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys,
inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

bb. **Recipient** as used in this Circular, means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

c. **Secretary** means the Secretary of the U.S. Department of Transportation.

dd. **Service area** refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

e. **Service standard/policy** means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

ff. **Statewide transportation improvement program (STIP)** means a statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and TIPs, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

g. **Subrecipient** means an entity that receives Federal financial assistance from FTA through a primary recipient.

hh. **Title VI Program** refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent.

ii. **Transportation improvement program (TIP)** means a prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

jj. **Transportation management area (TMA)** means an urbanized area with a population over 200,000, as defined by the Bureau of the Census and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.

kk. **VAC** is the Voluntary Action Center of DeKalb County, the provider of public transportation for residents and workers in DeKalb County.