

Title VI Plan Cover Page

MONROE RANDOLPH TRANSIT DISTRICT 2021

Title VI Contact: JESICA GENTRY SCHLIMME, EXECUTIVE DIRECTOR

Title VI Contact Phone: 618-443-4433

Title VI Contact Email: MRTDISTRICT@OUTLOOK.COM

Address: 820 W 2ND STREET, SPARTA IL 62286

Web Address: MRTRANSIT.ORG

Para Información en Español: JESICA GENTRY SCHLIMME

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Executive Summary

Monroe Randolph Transit District (MRTD) is a rural public transit provider, serving the counties of Monroe and Randolph in Southwestern Illinois. MRTD utilizes both State of Illinois (Downstate Operating Assistance Program) funds as well as FTA (5311) funds. MRTD has been a public transit district since 2002, providing transportation since 2005, and a 5311 recipient since FY09. MRTD is governed by a Board of Directors, composed of appointed members of each municipality within the service district over a population of 1,000, plus an additional appointee from each county.

What type of program fund(s) did you apply for?

- 5310
- 5311
- Other (please explain) _____

Type of Funding Requests? (Check all that apply)

- Vehicle Funds
- Operating Funds
- Other (please explain) _____ capital funding

Is your agency receiving direct funds from FTA?

- If yes, please attach a copy of your FTA letter of approval of Title VI Plan.
- No

Non-Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA MONROE RANDOLPH TRANSIT DISTRICT

MONROE RANDOLPH TRANSIT DISTRICT operates its programs and services without regard to race, color, national origin and persons with disabilities in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **MONROE RANDOLPH TRANSIT DISTRICT**.

For more information on the **MONROE RANDOLPH TRANSIT DISTRICT's** civil rights program, and the procedures to file a complaint, contact **JESICA GENTRY SCHLIMME, EXECUTIVE DIRECTOR, 618-443-4433, email MRTDISTRICT@OUTLOOK.COM**; or visit our administrative office at **820 W 2ND STREET, SPARTA IL 62286**. For more information, visit **MRTRANSIT.ORG**.

Complaints may be filed directly with the Illinois Department of Transportation (**IDOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 69 Washington Street Room 2100 Chicago, IL 60602 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **JESICA GENTRY SCHLIMME, 618-443-4433***Para información en Español llame: **JESICA GENTRY SCHLIMME**

Non-Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA MONROE RANDOLPH TRANSIT DISTRICT

MONROE RANDOLPH TRANSIT DISTRICT (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **MONROE RANDOLPH TRANSIT DISTRICT**, y los procedimientos para presentar una queja, contacte **JESICA GENTRY SCHLIMME, EXECUTIVE DIRECTOR 618-443-4433**, o visite nuestra oficina administrativa en **820 W 2ND STREET, SPARTA IL 62286**. Para obtener más información, visite **MRTRANSIT.ORG**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Illinois (**IDOT**). Atención: Title VI Program Manager, 69 W. Washington Street Chicago, IL 60602 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: **MRTD OFFICE located at 820 W 2nd St, Sparta, IL 62286, each vehicle in service, and online.**

This notice is posted online at **MRTRANSIT.ORG**

Non Discrimination ADA/Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **MONROE RANDOLPH TRANSIT DISTRICT** including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within **180** calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted **MONROE RANDOLPH TRANSIT DISTRICT** will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the **MONROE RANDOLPH TRANSIT DISTRICT** or submitted to the State or Federal authority for guidance.

- (7) **MONROE RANDOLPH TRANSIT DISTRICT** will notify the IDOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at (217) 782-2762; or email at DOT.Complaint@illinois.gov.
- (8) **MONROE RANDOLPH TRANSIT DISTRICT** has 5 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 5 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 5 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (10) A copy of either the closure letter or LOF must be also be submitted to IDOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with **MONROE RANDOLPH TRANSIT DISTRICT** decision may file a complaint with the Illinois Department of Transportation (**IDOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **IDOT**: ATTN ADA/Title VI Program Coordinator 69 W. Washington Street Room 2100 Chicago, IL 60602 **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at: **MRTRANSIT.ORG**.

If information is needed in another language, contact **Jesica 618-443-4433**. *Para información en Español llame: **JESICA GENTRY SCHLIMME**

Discrimination ADA/Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
		<input type="checkbox"/> Disability
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____
 Federal Court: _____ State Agency: _____
 State Court: _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

You may attach any written materials or other information that you think is relevant to your complaint.

Your signature and date are **required** below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

**MONROE RANDOLPH TRANSIT DISTRICT
 JESICA GENTRY SCHLIMME, EXECUTIVE DIRECTOR
 820 W 2ND STREET, SPARTA IL 62286
 618-443-4433
 MRTDISTRICT@OUTLOOK.COM**

A copy of this form can be found online at **MRTRANSIT.ORG**

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

If no investigations, lawsuits, or complaints were filed select the option below.

MONROE RANDOLPH TRANSIT DISTRICT has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **FY20**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
Investigations						
1)						
2)						
Lawsuits						
1)						
2)						
Complaints						
1)						
2)						

Public Participation Plan

MONROE RANDOLPH TRANSIT DISTRICT is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

As an agency receiving federal financial assistance, **MONROE RANDOLPH TRANSIT DISTRICT** made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to IDOT CRO.

***CHECK ALL THAT APPLY:**

- Expanded the distribution of agency brochures
- Advertised public announcements through newspapers, fliers, or radio
- Posted the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Lobby of agency
- Partnered with other local agencies to advertise services provided
- Hosted public information meetings and or hearings (Please insert the dates these meetings occurred below)
- Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities (MRTransit.org)
- Hosted an information booth at a community event (Please insert the date of the event below)
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures
- List other _____

MONROE RANDOLPH TRANSIT DISTRICT will make the following community outreach efforts for the upcoming year:

***CHECK ALL THAT APPLY:**

- Expand the distribution of agency brochures
- Advertise public announcements through newspapers, fliers, or radio
- Post the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Pick up and drop off stations
 - Lobby of agency
- Partner with other local agencies to advertise services provided.
- Host public information meetings and or hearings.

- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.
- List other _____

***PLEASE ATTACH DOCUMENTS OF PUBLIC PARTICIPATION METHODS HERE.**

Limited English Proficiency Plan

MONROE RANDOLPH TRANSIT DISTRICT has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to **MONROE RANDOLPH TRANSIT DISTRICT** services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the **MONROE RANDOLPH TRANSIT DISTRICT**'s extent of obligation to provide LEP services, the **MONROE RANDOLPH TRANSIT DISTRICT** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the **MONROE RANDOLPH TRANSIT DISTRICT** service area who may be served or likely to encounter by **MONROE RANDOLPH TRANSIT DISTRICT** program, activities, or services;

MONROE RANDOLPH TRANSIT DISTRICT's staff reviewed the Census Data found at the website below, estimating the number of persons who speak English less than very well for various other languages. Chart below:

Speak English "Less than very well"	Population in the Language Group	Percent of Total Population
Spanish	408	0.6%
Asian/Pacific Island	191	0.3%

** Demographic data found at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>*

Advanced Search: B16001 Language Spoken at Home

- 2) The frequency with which LEP individuals come in contact with an **MONROE RANDOLPH TRANSIT DISTRICT** services;

MONROE RANDOLPH TRANSIT DISTRICT's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **FY20**. **MONROE RANDOLPH TRANSIT DISTRICT** averages **0** contacts per **YEAR**.

- 3) The nature and importance of the program, activities or services provided by the **MONROE RANDOLPH TRANSIT DISTRICT** to the LEP population.

MONROE RANDOLPH TRANSIT DISTRICT provides vital transportation services for those in need of general transportation including but not limited to medical, employment, grocery, and entertainment. MRTD's service are has a LEP population less than 1% of the total population.

- 4) The resources available to **MONROE RANDOLPH TRANSIT DISTRICT** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

MONROE RANDOLPH TRANSIT DISTRICT provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision for written translations

MONROE RANDOLPH TRANSIT DISTRICT does not exceed the threshold to comply with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish once the threshold is met, after assessing changes in demographics every three years:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

- 1) **MONROE RANDOLPH TRANSIT DISTRICT** shall at that time, provide language assistance services through the below methods: (Check all that apply)

- Bilingual versions of:
 - "How to ride" brochures
 - Service change announcements
-

- 2) **MONROE RANDOLPH TRANSIT DISTRICT** shall at that time, provide notice to LEP persons about the availability of language assistance through the following methods:

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available from the agency.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
- Information tables at local events
- Signs available in vehicles
- Agency websites
- List other _____

3) **MONROE RANDOLPH TRANSIT DISTRICT** monitors, evaluates and updates the LEP plan through the following process:

MONROE RANDOLPH TRANSIT DISTRICT will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. **MONROE RANDOLPH TRANSIT DISTRICT** will make changes to the language assistance plan based on feedback received. **MONROE RANDOLPH TRANSIT DISTRICT** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **MONROE RANDOLPH TRANSIT DISTRICT** may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. **MONROE RANDOLPH TRANSIT DISTRICT** will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5) **MONROE RANDOLPH TRANSIT DISTRICT** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **MONROE RANDOLPH TRANSIT DISTRICT** will implement processes for training of staff through the following procedures:

MONROE RANDOLPH TRANSIT DISTRICT will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. **MONROE RANDOLPH TRANSIT DISTRICT** will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. **MONROE RANDOLPH TRANSIT DISTRICT** will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. **MONROE RANDOLPH TRANSIT DISTRICT** will implement LEP training to be provided for agency staff. **MONROE RANDOLPH TRANSIT DISTRICT** staff training for LEP to include:

- A summary of the **MONROE RANDOLPH TRANSIT DISTRICT** responsibilities under the DOT LEP Guidance;
- A summary of the **MONROE RANDOLPH TRANSIT DISTRICT** language assistance plan;
- A summary of the number and proportion of LEP persons in the **MONROE RANDOLPH TRANSIT DISTRICT** service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the **MONROE RANDOLPH TRANSIT DISTRICT** cultural sensitivity policies and practices.

Non-elected Committees Membership Table

Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

MONROE RANDOLPH TRANSIT DISTRICT does not select the membership of any transit-related committees, planning boards, or advisory councils.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

MONROE RANDOLPH TRANSIT DISTRICT has no current or anticipated plans to develop new transit facilities covered by these requirements.

Fixed Route Transit Analysis

Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

MONROE RANDOLPH TRANSIT DISTRICT is not a Fixed Route Transit Provider

Board Approval for the Title VI Plan

MRTD Board Meeting

01/28/2021

Meeting called to order by President Peter Hertzling.

Members in attendance: Peter Hertzling, Jessica Rucks, Melanie Johnson and Scott Dunakey. Also present were Director Jesica Gentry Schlimme, Don Jones, and Angela Craig.

The minutes from the last meeting were presented. Scott made a motion to approve the minutes as presented. Jessica seconded the motion. With a rollcall vote, the minutes were unanimously approved.

The financial report was discussed. Cash on hand was presented as \$179,011.88. There is no balance on the line of credit. MRTD is still waiting on grant payments from both FY 2020 and FY2021. The current outstanding requests total approximately \$130,000. Scott made a motion and Melanie seconded to approve the financial report as presented. The motion was unanimously approved with a roll call vote.

There was no old business to discuss. In new business, Jesica discussed the policy updates as a result of the IDOT audit in August 2020. Most noted, the curb-to-curb service policy was removed as it was out-of-compliance. The requirement is that we assist riders at their door, or to the door if they so request. Other changes include the Title VI plan, which addressed additional assistance for residents who do not speak English well. In this plan, MRTD will analyze census data to be sure we are under the threshold within the population to provide additional services, which we are at this time. This must be reviewed every 3 years. Also as part of the Title VI program, MRTD should incorporate a public participation plan when major changes are being made, to be sure no groups of the population are being unknowingly affected. The last component of the Title VI changes was to provide a complaint form. This form meets requirements for both Title VI, and ADA.

Scott made a motion, and Jessica seconded, to move forward with the Title VI plan. With a roll call vote, it was unanimously approved. Melanie made a motion, and Scott seconded, to approve the complaint form to satisfy both Title VI and ADA requirements. This was unanimously passed with a roll call vote.

Peter suggested that we review the census data annually so that if we are nearing the metrics to provide additional language services, we can prepare in advance. Jessica asked about verifying if a passenger needs additional services through ADA. Jesica explained that we are able to ask about needing services, without asking about the specific condition or handicap.

Jesica provided some additional operational information. At this time, six Sparta based employees and three Waterloo employees have received their first round of COVID vaccinations. There will be a driver training on February 15th. This is done annually. The line of credit is being renewed. Melanie

mentioned that Randolph County Board is discussing and voting on it at the February 5th meeting. Monroe County is requesting an update and presentation at a board meeting before they will approve. Scott mentioned that he will attend with Jesica when that meeting is scheduled.

The next meeting will be held February 25, 2021.

Scott made a motion to adjourn the meeting, and Jessica seconded it. The motion unanimously passed, and the meeting was adjourned.