

**Stateline Mass Transit District (SMTD)**  
**Title VI/Americans with Disabilities Act (ADA) Plan<sup>1</sup>**

**Revised on:** January 22, 2022

**Adopted by:** The SMTD Board

**Adopted on:** September 2, 2020

*This policy is hereby adopted and signed by:*

**SMTD**

**SMTD Board Chair:** Gus Larson

**Chair Signature:** 

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**Policy Statement**

The SMTD is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the SMTD in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

**Title VI/ADA Plan Elements**

The SMTD's Title VI/ADA plan includes the following elements:

1. Evidence of Policy Approval, Log of Policy Updates, Contact Information/Program Administration
2. Notice of Nondiscrimination
3. Complaint Procedure
4. Complaint Form
5. List of transit related Complaints, Investigations and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

*Note: Additional materials will be attached, if required.*

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<sup>1</sup> Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." – Title 42 USC Section 2000d

**Title II** of the Americans with Disabilities Act (ADA) protects individuals with disabilities from discrimination on the basis of disability in services, programs and activities provided by State and local government entities.

The **SMTD** will review its policy on an annual basis to determine if modifications are necessary.

The **SMTD** will use the table below to record reviews/revisions made to the plan.

As applicable, **SMTD** will discuss Title VI/ADA plan requirements with its transit contractor on an annual basis to ensure compliance with Title VI/ADA plan requirements.

### Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
6/22/2018	Title VI Plan Update	Sharon Hecox	Adopted by SMTD Board 7/25/2018
5/21/2020	Title VI/ADA Plan Update	Sharon Hecox	Adopted by SMTD Board 9/02/2020
1/26/2022	Title VI/ADA Plan Update – Revision Contact Information	Sharon Hecox	Approved by SMTD Board 1/26/2022

## Contact Information/Program Administration

### SMTD Board Chair

The **SMTD's** Board Chair will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

<b>Name:</b>	Gus Larson
<b>Email:</b>	glarson@northpointehealth.org
<b>Phone:</b>	815-525-4006

### Executive Director

The **SMTD's** Executive Director will ensure implementation of the **SMTD's** federally funded transportation program. The Executive Director has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **SMTD's** Board Chair.

<b>Name:</b>	Sharon Hecox
<b>Email:</b>	info@smttd.biz
<b>Phone:</b>	779-771-6778

### Civil Rights Coordinator

The **SMTD's** Civil Rights Coordinator ensures Title VI/ADA compliance in accordance with the **SMTD's** federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/ADA compliance. This position has a direct reporting relationship and access to the **SMTD's** Board Chair.

<b>Name:</b>	Sharon Hecox
<b>Email:</b>	Info@smttd.biz
<b>Phone:</b>	779-771-6778

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **SMTD's** nondiscrimination requirements, including the following activities:

- ✓ Program Administration
  - Ensure compliance with federal Title VI/ADA requirements
  - Develop and implement the **SMTD's** Title VI/ADA Plan
  - Update and maintain Title VI/ADA program policies and procedures
- ✓ Complaints
  - Review, track, investigate and close Title VI/ADA complaints
- ✓ Employee Training
  - Educate staff on Title VI/ADA and requirements and procedures
- ✓ Reporting
  - Prepare and submit Title VI/ADA reports per state and federal regulations
- ✓ Public Dissemination
  - Notify the public of the **SMTD's** Title VI/ADA program requirements via the **SMTD's** public area, on its website, in vehicles, etc.
- ✓ Oversight
  - Ensure contractors and lessees adhere to Title VI/ADA requirements

## Title VI/ADA - Notice of Nondiscrimination to the Public<sup>2</sup>

SMTD's *Notice of Nondiscrimination* is as follows:

### Notice of Nondiscrimination

#### SMTD

- ✓ The **SMTD** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **SMTD** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the **SMTD**.
- ✓ For more information on the **SMTD's** civil rights program, and the procedures to file a complaint, contact 779-771-6778, email [info@smttd.biz](mailto:info@smttd.biz); or visit our administrative office at 11722 Main St., Roscoe, IL 61073. For more information, visit <http://www.SMTD.biz>
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 779-771-6778.  
Si se necesita información en otro idioma de contacto, 779-771-6778.

SMTD's *Notice of Nondiscrimination* is posted in the following locations

- ✓ Agency website <http://www.SMTD.biz>
- ✓ Public areas of the agency office
- ✓ Inside vehicles
- ✓ Guide to Ride

SMTD's *Notice of Nondiscrimination* in Spanish is as follows:

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<sup>2</sup> Title VI and ADA regulations require **SMTD** to inform customers and the public of their rights under Title VI and ADA regulations by posting a *Notice of Nondiscrimination*. The public notice must include:

- ✓ A statement of nondiscrimination;
- ✓ Information on how to request additional information about the agency's Title VI and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc.;
- ✓ Information on how to request Title VI and ADA information in another language, if required.

The *Notice of Nondiscrimination* should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities

## **Aviso de no discriminación SMTD**

- ✓ El **SMTD** se compromete a garantizar que ninguna persona sea excluida, participe, se le nieguen los beneficios o se la discrimine por motivos de raza, color, nacionalidad, discapacidad, sexo, edad, religión, estado de ingresos o limitada. Dominio del inglés (LEP) en todos y cada uno de los programas, actividades o servicios administrados por el **SMTD** de conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y las autoridades de no discriminación relacionadas.
- ✓ Cualquier persona que crea que ha sido perjudicada por cualquier práctica discriminatoria ilegal puede presentar una queja ante el **SMTD**.
- ✓ Para obtener más información sobre el programa de derechos civiles de **SMTD** y los procedimientos para presentar una queja, comuníquese al 779-771-6778., envíe un correo electrónico a [info@smtd.biz](mailto:info@smtd.biz); o visite nuestra oficina administrativa en 11722 Main St., Roscoe, IL 61073. Para obtener más información, visite <http://www.SMTD.biz>
- ✓ Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, Edificio Este, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ Si necesita información en otro idioma, comuníquese al 779-771-6778.  
Si se necesita información en otro idioma de contacto, 779-771-6778.

## **Complaint Procedure**

The **SMTD's** Complaint Procedure is made available in the following locations and is also available in Spanish: *(list all that apply)*

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Public area of the agency office
- ✓ Transit shelters/facilities

Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by the **SMTD** may file a complaint by completing and submitting the **SMTD's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **SMTD**.

The **SMTD** investigates complaints received no more than 180 business days after the alleged incident. The **SMTD** will process complaints that are complete.

Once the complaint is received, the **SMTD** will review the complaint and work to resolve the complaint informally, if possible.

If the complaint warrants a formal civil rights complaint process, the **SMTD** will follow the steps listed in this complaint procedure. The **SMTD** may also use this formal procedure to address general complaints. If the **SMTD** determines it has jurisdiction the complainant will receive an acknowledgement letter stating the complaint will be investigated by the **SMTD** as a civil rights complaint.

The **SMTD** has 90 business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **SMTD** may contact the complainant.

The complainant has 45 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 45 business days, the **SMTD** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two (2) letters will be issued 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 Title VI/ADA violation and that the case will be closed.
- ✓ A letter of finding (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.

If the complainant wishes to appeal the decision, the complainant has 45 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 779-771-6778.

Si se necesita información en otro idioma de contacto, 779-771-6778.

## Procedimiento de queja

El Procedimiento de queja de **SMTD** está disponible en los siguientes lugares y también está disponible en inglés: (*enumere todos los que correspondan*)

- ✓ Sitio web de la agencia, ya sea como referencia en el Aviso al público o en su totalidad
- ✓ Área pública de la oficina de la agencia
- ✓ Refugios / instalaciones de tránsito

Cualquier persona que crea que ha sido discriminada por su raza, color, origen nacional, discapacidad, sexo, edad, religión, estado de ingresos o dominio limitado del inglés (LEP) por el **SMTD** puede presentar una queja completando y presentando el Formulario de queja de **SMTD**.

El Formulario de queja también se puede usar para presentar quejas generales al **SMTD**.

El **SMTD** investiga las quejas recibidas no más de 180 días hábiles después del presunto incidente. El **SMTD** procesará las quejas que estén completas.

Una vez que se recibe la queja, el **SMTD** revisará la queja y trabajará para resolverla de manera informal, si es posible.

Si la queja garantiza un proceso formal de queja de derechos civiles, el **SMTD** seguirá los pasos enumerados en este procedimiento de queja. El **SMTD** también puede usar este procedimiento formal para atender quejas generales. Si el **SMTD** determina que tiene jurisdicción, el demandante recibirá una carta de reconocimiento indicando que el reclamo será investigado por el **SMTD** como una queja de derechos civiles.

El **SMTD** tiene 90 días hábiles para investigar la queja de derechos civiles. Si se necesita más información para resolver el caso, el **SMTD** puede contactar al demandante.

El demandante tiene 45 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Si el demandante no contacta al investigador o no recibe la información adicional dentro de los 45 días hábiles, el **SMTD** puede cerrar el caso administrativamente. Un caso puede cerrarse administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el investigador revise la queja, se emitirá una de dos (2) cartas al demandante: una carta de cierre o una carta de hallazgo (LOF).

- ✓ Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI / ADA y que el caso se cerrará.
- ✓ Una carta de hallazgos (LOF) resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si ocurrirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción.

Si el demandante desea apelar la decisión, tiene 45 días hábiles después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en la Oficina de Derechos Civiles de la FTA, 1200 New Jersey Avenue SE, Washington, DC 20590.

Si se necesita información en otro idioma, comuníquese al 779-771-6778.

# SMTD - Complaint/Comment Form

SMTD is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at [info@smtd.biz](mailto:info@smtd.biz) or in person at the address below.

## SMTD

Administrative Office  
11722 Main St.  
Roscoe, IL 61073

You may also call us at 779-771-6778. Please make sure to provide your contact information in order to receive a response.

## Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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## Section B: Contact Information

Name	Telephone Number (including area code)
Address	City
State	Zip Code

Email Address

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

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
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## Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Gender	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

## Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Bus	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Other
What was the date of the occurrence?			
What was the time of the occurrence?			
What is the name or identification of the employee or employees involved?			
What is the name or identification of others involved, if applicable?			
What was the number or name of the route you were on, if applicable?			
What was the direction or destination you were headed to when the incident occurred, if applicable?			
Where was the location of the occurrence?			
Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please add any additional descriptive details about the incident.			

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

### Section E: Follow-up

May we contact you if we need more details or information?

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

### Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

### Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the SMTD

Name:

Date:

Signature:

# SMTD - Formulario de queja / comentario

SMTD se compromete a proporcionarle servicios de transporte seguros y confiables y queremos sus comentarios. Utilice este formulario para sugerencias, cumplidos y quejas.

Envíe este formulario electrónicamente a [info@smt.d.biz](mailto:info@smt.d.biz) o en persona a la siguiente dirección.

## SMTD

Oficina Administrativa  
11722 Main St.  
Roscoe, IL 61073

También puede llamarnos al 779-771-6778. Asegúrese de proporcionar su información de contacto para recibir una respuesta.

## Sección A: Requisitos de formato accesible

Por favor verifique el formato preferido para este documento

<input type="checkbox"/> Letra grande	<input type="checkbox"/> TDD o retransmisión	<input type="checkbox"/> Grabación de audio	<input type="checkbox"/> Otro (si está seleccionado, indique qué tipo de formato necesita en el cuadro a continuación)
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## Sección B: Información de contacto

Nombre	Número de teléfono (incluido el código de área)
Dirección	Ciudad
Estado	Código postal

Dirección de correo electrónico

¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
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En caso negativo, proporcione el nombre y la relación de la persona por la que se queja y por qué está completando el formulario en su nombre en el cuadro a continuación.

Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una solicitud en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
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## Sección C: Tipo de comentario

¿Qué tipo de comentario estás proporcionando? Por favor, compruebe qué categoría se aplica mejor.

<input type="checkbox"/> Queja	<input type="checkbox"/> Sugerencia	<input type="checkbox"/> Cumplido	<input type="checkbox"/> Otro
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¿Cuál de los siguientes describe la naturaleza del comentario? Por favor marque una o más de las casillas de verificación.

<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen nacional	<input type="checkbox"/> Religión
<input type="checkbox"/> Edad	<input type="checkbox"/> Género	<input type="checkbox"/> Servicio	<input type="checkbox"/> Estado de ingresos
<input type="checkbox"/> Dominio limitado del inglés (L.E.P)		<input type="checkbox"/> Ley de estadounidenses con discapacidad (A.D.A)	

## Sección D: Detalles del comentario

Responda las preguntas a continuación con respecto a su comentario.

¿Ocurrió el incidente en el siguiente tipo de servicio? Por favor marque cualquier casilla que pueda aplicar.	<input type="checkbox"/> Autobús	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Otro
¿Cuál fue el momento de la ocurrencia?			
¿Cuál fue el momento de la ocurrencia?			
¿Cuál es el nombre o la identificación del empleado o empleados involucrados?			
¿Cuál es el nombre o la identificación de otras personas involucradas, si corresponde?			
¿Cuál era el número o el nombre de la ruta en la que estaba, si corresponde?			
¿Cuál era la dirección o el destino al que se dirigía cuando ocurrió el incidente, si corresponde?			
¿Dónde estaba la ubicación del hecho?			
¿El uso de una ayuda de movilidad estuvo involucrado en el incidente?	<input type="checkbox"/> Si	<input type="checkbox"/> No	
Agregue cualquier detalle descriptivo adicional sobre el incidente.			

En el cuadro a continuación, explique con la mayor claridad posible lo que sucedió y por qué cree que fue discriminado.

### Sección E: Seguimiento

¿Podemos contactarlo si necesitamos más detalles o información?

Sí

No

En caso afirmativo, ¿cómo le gustaría ser contactado? Seleccione su forma de contacto preferida a continuación

Teléfono

Correo electrónico

Correo

Si prefiere que lo contactemos por teléfono, indique el mejor día y hora para comunicarse con usted.

### Sección F: Resultado deseado

Enumere a continuación, los pasos que le gustaría tomar para abordar el conflicto o el problema.

Si corresponde, enumere a continuación todas las agencias adicionales con las que ha presentado esta queja, como las agencias federales, estatales o locales, o ante cualquier tribunal federal o estatal. Incluya la información de contacto a donde se envió la queja.

### Sección G: Firma

Adjunte todos los documentos que tenga que respalden la denuncia. Luego feche y firme este formulario y envíelo al SMTD

Nombre:

Fecha:

Firma:

## List of Complaints, Investigations and Lawsuits<sup>3</sup>

The **SMTD** maintains a list or log to track and resolve all complaints, investigations and lawsuits, pertaining to its transit-related activities.

**Check One:**

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

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

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint <sup>4</sup>	Summary Complaint Description	Status	Action(s) Taken

<sup>3</sup> **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

<sup>4</sup> **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

## Public Participation Plan

### Strategies and Desired Outcomes

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

- ✓ Maintain the **SMTD** website with up to date and complete information on service and public input opportunities. Include a 30-second video about **SMTD** on the agency website
- ✓ Use social media and update the **SMTD** Facebook page and “TEXT Club” regularly
- ✓ Provide extensive information in the **SMTD** Guide to Ride in English and Spanish
- ✓ Partner with other area public transit providers including Rockford Mass Transit District (RMTD), Beloit Transit System (BTS), Janesville Transit System (JTS) and Rock County Specialized Transit (RCST) for the purpose of facilitating regional transit opportunities
- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible meeting locations and times
- ✓ Employ different meeting sizes and formats as appropriate
- ✓ Use the media and press as appropriate to communicate information on **SMTD** services and planning
- ✓ Explore outreach opportunities at libraries, senior centers, schools, church groups, community service clubs, farmer’s markets, expositions and other functions
- ✓ Actively participate in the Stateline Area Transportation Study (SLATS) MPO 3-C transportation planning process (e.g. in development of UPWP, TIP, MTP, performance targets, TDPs and transit plans which include extensive public outreach)

### Public Outreach Activities

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

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

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method will be used for future planning efforts.

Event Date	SMTD or other Staff (e.g MPO, Consultant)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
2017-2020	Hecox	Monthly SMTD Board Meetings (Ongoing)	Formal Public Notice, Email list	SMTD Board Meetings	Public participation opportunity provided at each meeting

<b>Event Date</b>	<b>SMTD or other Staff (e.g MPO, Consultant)</b>	<b>Event</b>	<b>Date Publicized and Communication Method (Public Notice, Posters, Social Media)</b>	<b>Outreach Method (Meeting, Focus Group, Survey, etc).</b>	<b>Notes</b>
6/12/17	Hecox, Flesch, Dupuis, Nee	TIP Amendment for SMTD	Formal Public Notice 5/26/17 & 6/5/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 31 attendees
9/27/17	Flesch, Dupuis, Nee	Draft TIP	Formal Public Notice 9/13/17 & 9/20/17, MPO Website, Email List	Open House	Stateline YMCA (combined with Bike and Pedestrian Plan Open House) 16 attendees
10/23/17	Flesch, Dupuis, Nee	Final TIP	Formal Public Notice 10/9/17 & 10/16/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 21 attendees
12/7/17	Flesch, Nee	SLATS Title VI Plan	Formal Public Notice 11/22/17 & 11/30/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 20 attendees
4/16/18	Hecox, Flesch, Dupuis, Nee	Cooperative Agreement between SLATS, SMTD and IDOT	Formal Public Notice 3/16/18 & 3/23/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 24 attendees
10/15/18	Dupuis, Nee	Draft TIP	Formal Public Notice 9/28/18 & 10/5/18, MPO Website, Email List	Open House	Beloit Public Library 3 attendees
10/29/18	Hecox, Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan Performance	Formal Public Notice 10/16/18 & 10/22/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 21 attendees



<b>Event Date</b>	<b>SMTD or other Staff (e.g MPO, Consultant)</b>	<b>Event</b>	<b>Date Publicized and Communication Method (Public Notice, Posters, Social Media)</b>	<b>Outreach Method (Meeting, Focus Group, Survey, etc).</b>	<b>Notes</b>
		Measure Targets			
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Onsite in-person	Pop-up meetings	7 locations around Stateline with about 40 participants
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Internal scheduling	Stakeholder meetings	7 meetings with representatives from area organizations
7/24/19	SRF	MPO-wide Transit Plan	Email lists, City website, Facebook during survey timeframe	Community Survey (paper and online)	English and Spanish at 8 locations and online. 88 responses.
10/14/19	Dupuis, Nee	Draft TIP	Formal Public Notice 9/27/19 & 10/4/19, MPO Website, Email List	Open House	Beloit Public Library 4 attendees
10/28/19	Hecox, Thompson, Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan Performance Measure Targets	Formal Public Notice 10/11/19 & 10/21/19, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 22 attendees
Spring/Summer 2020	SRF, SLATS, City of Beloit, SMTD	MPO-wide Transit Plan Final	TBD	TBD	Final presentation and outreach being planned. With current COVID-19 pandemic, specific details unknown as of date of this Title VI Plan development (May 2020).

## Language Assistance Plan

### Plan Components

As a recipient of federal US DOT funding, the **SMTD** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

The **SMTD's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

### Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **SMTD** has conducted a *Four Factor Analysis*<sup>5</sup> of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

#### *LEP Four Factor Analysis*

**Factor 1: Demography:** Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **SMTD** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

The **SMTD** did the following:

1. Inserted a copy of the **SMTD's** service area LEP data at the end of this Title VI/ADA plan. This data was found at the US Census Bureau website [https://data.census.gov/cedsci/table?tid=ACSDT5Y2015.B16001&hidePreview=true&g=0600000US1720165169,1720165624&moe=true&vintage=2015&layer=VT\\_2015\\_160\\_00\\_PY\\_D1&cid=B16001\\_001E&tp=false](https://data.census.gov/cedsci/table?tid=ACSDT5Y2015.B16001&hidePreview=true&g=0600000US1720165169,1720165624&moe=true&vintage=2015&layer=VT_2015_160_00_PY_D1&cid=B16001_001E&tp=false)
2. Analyzed the LEP demographic data for the **SMTD's** program and/or service area by calculating the *Safe Harbor Threshold* for the largest language groups identified other than English.

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<sup>5</sup> DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

- a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the service area.
  - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the **SMTD** must provide translation of vital documents in written format for the non-English users.
  - ii. Examples of written translation of vital documents include the Nondiscrimination policy statement, Complaint Procedure, Complaint Form, and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

**Factor 2: Frequency:** Identifies the frequency staff (and transit contractor) encounters LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn’t mean they don’t speak English or are identified as LEP.

The summary below discusses the frequency with which **SMTD** staff, and/or its transit contractor encounter LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **SMTD** staff persons are encouraged to use LEP resource materials to assist LEP persons.

**Factor 3: Importance:** Explains how the program, service or activity affects people’s lives.

The summary below discusses how the **SMTD’s** program and services impact the lives of persons within the community. The **SMTD** will specify the community organizations that serve LEP persons, if available.

**Factor 4: Resources and Costs:** Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the **SMTD** uses to provide outreach to LEP persons as well as train staff (and transit contractor) on Title VI/ADA and LEP principles.

*Additional Required Elements*

In addition to the *Four Factor Analysis (listed below as item #1)*, the **SMTD** addresses the following elements:

- Item #2:** A description of how language assistance services are provided by language
- Item #3:** A description of how LEP persons are informed of the availability of language assistance service
- Item #4:** A description of how the language assistance plan is monitored and updated
- Item #5:** A description of how employees are trained to provide language assistance to LEP persons

*And, any additional information deemed necessary.*

## SMTD – Summary of the Language Assistance Plan Components

### Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

#### Factor 1 – Demography

The **SMTD** contracts with Rockford Mass Transit District (RMTD) to provide curb-to-curb demand response public transit for the **SMTD** service area including the City of South Beloit, Village of Rockton, Village of Roscoe, Rockton Township and Roscoe Township in northern Winnebago County, Illinois.

The US Census Bureau (*Table B16001, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older, 2015 ACS 5 Year Estimates*) reports there are numerous languages spoken in the **SMTD** service area. Some of these languages include Spanish, Vietnamese, Russian and German. After English, the second largest language group overall is Spanish.

The Safe Harbor Threshold was calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the service area geographies. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **SMTD** must provide translation of vital documents in written format for non-English speaking persons.

The **SMTD** service area has a population estimate of 38,415 (*Table B01003, 2018 ACS 5 Year Estimates*). This total includes all of Rockton and Roscoe Townships including the incorporated areas within (City of South Beloit, Village of Rockton and Village of Roscoe), as well as that portion of Harlem Township that is incorporated by the Village of Roscoe. With a margin of error, this number might be as low as 38,018 (for calculation purposes).

According to Census Table B16001 noted above, an estimated 335 persons have identified themselves as Spanish speaking and “speaks English less than very well.” With the margin of error, this number might be as high as 580. This is by far the highest LEP group identified and the focus of this analysis. It is important to note that this data is for incorporated and unincorporated areas of Rockton and Roscoe Townships only, and that it is not readily available for smaller geographies within a specific township such as it is with population total noted above (e.g. the Village of Roscoe portion of Harlem Township) without drilling down to tract level. In other words, for this part of Illinois, LEP data is available township-wide, which includes incorporated municipalities, or at the municipal level, but not readily at the township minus municipal level. So it is difficult to determine how many LEP individuals live within the Harlem Township portion only of the Village of Roscoe. That said, if we were to assume all the Spanish-speaking LEP individuals in the Village of Roscoe reside in Harlem Township (which is not the case, some are likely within Roscoe and Rockton Townships) that would add up to 140 (76 +/- 64) individuals making the total up to 720 rather than 580 (for calculation purposes). Even still this would be less than 2% of the total population and below the 5% or 1,000 persons threshold of the population to be served.

This means the **SMTD** is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **SMTD** is also not required to provide written translation of vital documents in these languages. However, it is worth noting that Census Table B16001 estimates the City of South Beloit alone has a population of 7,347. For purposes of this analysis, with the margin of error it could be as low as 6,954 (for calculation purposes). An estimated 152 persons have identified themselves as Spanish speaking and “speaks English less than very well.” With the margin of error, this number might be as high as 283, pushing the potential number of Spanish-speaking South Beloit residents that speak English “less than very well” to 4%. While still under the Safe Harbor Threshold of 5%, **SMTD** recognizes the Spanish-speaking population is growing within the **SMTD** service area, particularly in the City of South Beloit.

It is also worth noting that even though the **SMTD** is below the Safe Harbor Threshold and is not required to provide written translation of vital documents, it provides translations to key and critical documents in Spanish, including the Guide to Ride, the Non-discrimination Notice, the Complaint Procedure and the Complaint Form. The agency website can also be easily viewed in Spanish or English with one click.

In the future, if the **SMTD** meets the Safe Harbor Threshold for any other language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

**Factor 2 – Frequency**

The **SMTD** and its transit contractor are trained on what to do when they encounter a person with limited English proficiency. The **SMTD** with assistance from its transit contractor tracks the number of encounters and consider adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **SMTD**'s programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

## Log of LEP Encounters

The **SMTD** provides rides to approximately 24,000 persons per year. While formal data has not been collected, the transit provider/lessee has indicated it has encountered less than ten LEP persons using the service within the last year.

The **SMTD** staff has reviewed the frequency it has, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, **SMTD** has zero requests for interpreters and zero requests for translated program documents, although a Spanish version of the Guide to Ride is readily accessible in office and on the **SMTD** website.

The **SMTD** and its transit contractor have an open-door policy and will provide rides to any person who requests a ride. If a language barrier exists, the dispatcher or driver will work with the Transit Manager or appropriate person and the **SMTD** to ensure the individual receives access to the transportation service.

The “I Speak” Language Identification Card listed below is a document that can be placed in our transit vehicles and used by the **SMTD** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **SMTD**’s service area. The languages included below represent most LEP persons within the **SMTD** service area based on the US Census Bureau (*Table B16001, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older, 2015 ACS 5 Year Estimates*).

### “I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	我說中文	Chinese
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	میں نے اردو بولتے ہیں	Urdu
	Ja mówię po polsku	Polish
	ฉันพูดไทย	Thai
	Io parlo italiano	Italian
	Govorim hrvatski	Croatian

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

### Factor 3 – Importance

The **SMTD** and our transit contractor understand an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. A transportation system is a key link to connecting LEP persons to these essential services.

Demand-response service can pose two unique challenges for LEP persons including registration and ride scheduling. Persons seeking **SMTD** services must first register to establish their age and any other conditions that qualify them for reduced fares. Then, they must call and schedule the ride. These two seemingly simple tasks can be daunting for an LEP person. This is why **SMTD** decided to go beyond the minimum standard (as per the Safe Harbor Provision) and publish its Guide to Ride in Spanish, make the Spanish version available on the **SMTD** Website and provide other critical materials in Spanish including the Non-discrimination Notice, the Complaint Procedure, and the Complaint Form.

To date there have been no language problems or situations with registration or ride scheduling, there have been no requests for interpreters and no requests for translations of other documents.

The **SMTD** has identified other activities and services important to individuals if language barriers prevented access to information including:

- Providing emergency evacuation instructions in our vehicles
- Providing information to the public on security awareness or emergency preparedness.
- Service modification such as expansion or reduction of hours of service.
- Fare increases
- Changes to eligible medical facilities and other destinations outside the **SMTD** typical service area that are available to riders
- Potentially adding fixed-route or deviated fixed-route service
- The availability of translation services
- Other policy changes that might affect the conditions of ridership.

Note that it is the policy of the **SMTD** Board to include public involvement before considering any changes to decrease or increase services.

The **SMTD's** assessment of critical needs includes contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

### Factor 4 – Resources and Costs

Even though the **SMTD** does not have a separate budget for LEP outreach, it continuously explores ways to implement low cost methods of notifying LEP persons of transportation services. Although not required, **SMTD** provides written translation to key and critical documents in Spanish, including the Guide to Ride, the Non-discrimination Notice, the Complaint Procedure and the Complaint Form. The agency website can also be easily viewed in Spanish or English with one click. Additional low-cost outreach methods to reach LEP communities include but are not limited to participating in public

meetings to promote transportation services and visiting community centers, libraries, local festivals, expositions and parades. The cost is relatively low but the potential to reach the LEP population is high.

**SMTD** will continue to translate critical documents and will explore extending translation capabilities to safety and security related announcements, schedule information, and major planning / decision-making information, as discussed above.

**SMTD** recognizes that in addition to Spanish-speaking LEPs, there are other LEP persons in the service area. While it is not feasible to provide proactive translations in each language, if requests are made, **SMTD** will attempt assistance wherever it is needed. The **SMTD** has available at Board Meetings and other public meetings the US Census "I Speak" Language Identification Card to help identify specific language barriers and assist with accommodating all individuals.

**SMTD** also relies on the resources of its transit contractor, RMTD, for ride scheduling, dispatching, vehicle operation, and vehicle maintenance. RMTD is a much larger agency operating in a much larger service area with a wider and more diverse service population. RMTD is an information and resource base that **SMTD** can call upon for assistance, or at least advice, when needed. RMTD operates with public funds and provides its own extensive LEP Plan. Through RMTD, **SMTD** may be able to obtain interpreter services, not just in Spanish, but also in other languages.

Likewise, **SMTD** also has a close relationship with BTS. **SMTD** picks up and drops off patrons on a regular basis at the BTS Transfer Center. Like RMTD, BTS also has and LEP Plan and is a resource that **SMTD** can call upon for advice or possible assistance. **SMTD** can partner with both RMTD and BTS as they extend outreach efforts to LEP persons.

Other resources available include public service agencies located in Beloit, just across the Stateline. Two that provide assistance to LEP persons include:

- The Stateline Literacy Council (SLC), located in the Beloit Public Library at 605 Eclipse Boulevard, Beloit, WI 53511 <https://www.statelineliteracycouncilbeloit.org/>
- The Latino Service Providers Coalition (LSPC) located at 717 Hackett St., Beloit, WI 53511 <https://latinoservices.org/>

Lastly, online translation widgets such as Google Translate are a resource for the translation of documents. These tools are free and very fast. A large document can be translated into a variety of languages. The main downside is accuracy, especially for documents with technical jargon. Nevertheless, this is an efficient and economical approach, and the accuracy of these tools is likely to evolve over time. So far, **SMTD** has implemented a widget on its website to translate the page into Spanish.

## Item # 2 – Description of how Language Assistance Services are Provided, by Language

The **SMTD** will ensure the following measures or resources are in place to provide language assistance services:

- "*Basic Spanish for Transit Employees*" pocket books (published by Colorado DOT, Colorado Mountain College, and Roaring Fork Transportation Authority), or the equivalent, are issued



to all vehicle operators assigned to **SMTD** routes and all staff who have contact either through phone or meeting with **SMTD** patrons.

- The **SMTD** will update its website as applicable to include information specific to meeting the needs of any LEP person; including contact information with the Executive Director of **SMTD**.
- The **SMTD** will investigate and implement adding other language translation widgets to the **SMTD** website. It currently does so for Spanish.
- The **SMTD** will collaborate with community organizations to provide translation assistance for LEP persons, help with translation of printed and online information and provide educational and outreach opportunities to help improve access for LEP persons.
- The **SMTD** Guide to Ride will continue to be provided in Spanish and English versions. Other critical documents, such as application forms will be translated in response to demand and as funds are available.
- The **SMTD** will continue to annually review its transit contractor's operations to verify compliance with FTA regulations pertaining to LEP persons. **SMTD** will notify its transit contractor if any deficiencies are identified, and provide proper follow-up through resolution. The review will be conducted in June each year and an annual report to the **SMTD** Board will be issued.
- When encountering LEP persons directly, if needed **SMTD** staff will use the US Census "I Speak" Language Identification Card or posters to identify the language and communication need of LEP persons. Cards will be available at Board meetings and other public meetings as well. The **SMTD** may not be able to immediately accommodate or assist Individuals self-identifying as persons not proficient in English, but will seek means to assist the individuals at later times or in future meetings.
- The **SMTD** will provide US Census "I Speak" Language Identification Card on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, **SMTD** will instruct its transit contractor to have its vehicle operators try to obtain contact information to give to the **SMTD** Executive Director for follow-up. Language Identification Cards will be made available at the transit contractor's main office and staff will be instructed to obtain contact information from LEP individuals they encounter either in person or over the phone.

<b>Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service</b>
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The **SMTD** and our transit contractor do the following to inform LEP persons of the availability of language assistance services:

- ✓ Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed
- ✓ Utilize bilingual speaking persons and tools available to assist with the development of bilingual outreach material

- ✓ Hold public Open Houses on the operations and policies of **SMTD**
- ✓ Develop and maintain cooperative relationships with key agencies that serve LEP populations in the area or region. These may include but are not limited to:
  - La Voz Latina in Rockford
  - Alerta Hispanic American Awareness Committee
  - The Stateline Literacy Council (SLC)
  - The Latino Service Providers Coalition (LSPC)
  - Greater Rockford Italian American Association
  - The German Society of Rockford
  - Rockton Township General Assistance Program

These entities and others can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs. **SMTD** will continue to use and expand these relationships as well as relationships with other community organizations to ensure that necessary assistance to all LEP persons is available, provide increased services to LEP persons and to foster outreach to educate the public about the availability of demand response bus service within the community.

#### Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

The **SMTD** ensures Title VI-ADA requirements are met. The **SMTD** records updates and reviews to its Title VI-ADA plan in the *Policy Updates-Activity Log* section of the Title VI-ADA plan.

On an ongoing basis, the **SMTD** assesses changes in demographics, types of services or other rider needs. This review assesses the efficacy of the LEP policies and procedures, including but not limited to monitoring of requests received for interpreters or translations, complaints filed by LEP person, needs identified through community outreach activities and routine feedback from direct-service staff.

During oversight management with its transit contractor, **SMTD** will verify both verbally and through examination of records, whether requests for language assistance have been received in the past. **SMTD** will seek to determine if such requests have been made at meetings, over the phone, during the client registration and/or the ride-scheduling procedures. This information will help determine whether language assistance might be indicated for future events or services.

At least annually, the **SMTD** will survey its transit contractor vehicle operators and other staff on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted in June each year. The **SMTD** Executive Director will issue an annual report with results to the **SMTD** Board.

Additionally, **SMTD** may work with its transit contractor on internal monitoring by performing ride checks, in which LEP persons are engaged to ride and report on the experience (note that this activity is designed to collect information on LEP implementation, not to monitor the performance of any specific employee resulting in corrective or disciplinary action). Based on feedback received, **SMTD** may make changes, or request its transit contractor make changes to the type of written or oral language assistance provided. Evaluation may result in expansion of language assistance measures that are effective, or the modification or elimination of measures which are less effective.

The **SMTD** will evaluate relevant information to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons. If it is found that service to LEP persons is expanding, **SMTD** may modify the implementation plan as needed in order to ensure meaningful access by previously underserved LEP persons. The LEP Plan will be reviewed and updated every three years, as part of **SMTD's** Title VI Plan update.

**Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons**

The **SMTD** does not currently have employees other than the Executive Director, but nonetheless is oriented on the principles of Title VI/ADA and the **SMTD's** Language Assistance Plan. Any new employees will be provided guidance on the needs of clients served and how best to meet their needs.

Most operational aspects are provided by the **SMTD's** transit contractor, RMTD, via Intergovernmental Agreement. **SMTD**, through its Executive Director and Board, will continue oversight management of its transit contractor's operations to ensure compliance with the Language Assistance Plan. The **SMTD** will ensure its transit contractor, as applicable, educates its staff on Title VI and ADA requirements, specifically complaint procedures and LEP provisions. If a vehicle operator, dispatcher or employee needs further assistance related to LEP individuals, they will work with the **SMTD** and/or transit contractor's Transit Manager or appropriate person to identify necessary actions (immediate, short-term and long-term) designed to best meet the language needs of the participants of the program or service.

As part of our annual check in meeting with our transit contractor, as applicable, the **SMTD** will discuss the **SMTD's** Title VI/ADA and Language Assistance Plan compliance requirements to:

- Determine that our transit contractor is providing appropriate ongoing training of individuals likely to come into contact with **SMTD** patrons, holding at least one training session per year on the topic of serving LEP persons, and that our transit contractor's procedures meet required federal regulations.
- Verify that "*Basic Spanish for Transit Employees*" pocket books or the equivalent, are issued and available to all vehicle operators assigned to **SMTD** routes.
- Verify that our transit contractor has copies of the **SMTD** Guide to Ride (both Spanish and English versions) readily available, and that staff that have contact with **SMTD** riders (by phone or in person) provide the appropriate version to riders.
- Present the results of the review in the Executive Director's annual LEP report to the **SMTD** Board.

## Minority Representation Information<sup>6</sup>

### A. Minority Representation Table

The table below depicts US Census Bureau estimates (*Table B03002, Hispanic or Latino Origin by Race, 2018 ACS 5 Year Estimates*) for an area including but somewhat larger than **SMTD's** service area along with the **SMTD's** non-elected committees/councils related to transit.

Body	White alone	Black/ African American alone	American Indian/Alask a Native alone	Asian alone	Native Hawaiian/other Pacific Islander alone	Other/ 2 or more races alone	Hispanic or Latino of any race
Rockton, Roscoe and Harlem Townships including cities and villages	88.1%	2.1%	0%	2.1%	0%	2.2%	5.3%
SMTD Board	100%	0%	0%	0%	0%	0%	0%

Note the percentages noted above for Rockton, Roscoe and Harlem Townships include incorporated cities and villages within the Township borders. While the **SMTD** service area includes a portion of Harlem Township that is part of the Village of Roscoe, the vast majority of the population within Harlem Township is not within the **SMTD's** service area and as such these percentages are likely skewed since Harlem Township is larger and more diverse. That said, these estimates are more representative of the **SMTD** service area than using Winnebago County as a whole.

### B. Efforts to Encourage Minority Participation

The **SMTD** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **SMTD** would encourage participation of all its citizens should the opportunity to join a committee, council or board arise.

As vacancies on such committees, councils or boards become available, the **SMTD** will work with appointing authorities to make efforts to encourage and promote diversity. Note that representation on the **SMTD** Board is determined by each local participating community's elected official(s), not the **SMTD**.

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<sup>6</sup> While it does not at this time, if the **SMTD** had transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the **SMTD**, Title VI regulations require the **SMTD** to provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

*Minority Representation Data Collection Form<sup>7</sup>*

**Name of board, commission, council, etc.**

Date:

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Dear Member,

As the **SMTD** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

**Anti-Discrimination Notice**

It is unlawful for the **SMTD** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a Board under the jurisdiction of the **SMTD**, we invite members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI and ADA regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

**Race/Ethnicity**

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

\_\_\_ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

\_\_\_ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

\_\_\_ *Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

\_\_\_ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

\_\_\_ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

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<sup>7</sup> This form is an optional tool the **SMTD** may use to gather information on the racial composition of its Board members for the purposes of meeting the Title VI/ADA plan requirements.

**Facility Location Equity Analysis**

*(For recipients constructing a facility)  
(Not applicable to the SMTD at this time)*

**Fixed Route Service Standards**

*(For all Fixed Route Transit Providers)  
(Not applicable to the SMTD at this time)*

**Fixed Route Service Policy**

*(For all Fixed Route Transit Providers)  
(Not applicable to the SMTD at this time)*

**MPO Demographic Data, Analysis and Procedures**

*(For MPOS only)  
(Not applicable to the SMTD)*

APPROVED



ORIGINAL