

EFF CO. BLDG. & JAIL



EFFINGHAM COUNTY, ILLINOIS TITLE VI TRANSPORTATION PLAN

August 19, 2024



1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.1(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Effingham County assures the Illinois Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Effingham County further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the Effingham County Board Chairman or authorized representative.
2. Issue a policy statement signed by the County Board Chairman or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the County Board of Effingham and to the general public. Such information shall be published where appropriate in language other than English.
3. Develop a complaint process and attempt to resolve complaints of discrimination against Effingham County.
4. Participate in training offered on the Title VI and other nondiscrimination requirements.
5. If reviewed by IDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
6. Have a process to collect racial and ethnic data on persons impacted by the County's programs.
7. Submit the information required by FTA Circular 4702.1B to the IDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the County.

Signature:

Joshua Douthit, Chairman
December 18, 2023

2.0 Introduction & Description of Transportation Services

The County of Effingham submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Effingham County is a recipient of FTA funds and provides service in Effingham County in Illinois. A description of the current Effingham County Public Transportation system is included in Appendix B.

Title VI Liaison Contact Information

Kelly Lockhart
217-342-4990
c/o Effingham County Board
101 N 4th St Suite 301 Effingham IL 62401
klockhart@co.effingham.il.us

2.1 Annual Certifications and 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 applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

FTA Circular 4702.18, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

Effingham County will remain in compliance with this requirement by annual submission of certifications and assurances as required..

2.2 Title VI Plan Concurrence

This Title VI Plan was approved and adopted by the Effingham County Board on December 18, 2023. A copy of the Resolution is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 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.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin.
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations.
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee.

A sample of the notice is included in Appendix D of this Plan.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Effingham County's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in the Lobby of the Effingham County Building at 101 N 4th St Effingham IL, at www.effingham.co.il.us and county news media outlets.

FTA Circular 4702.1B, Chapter III, Paragraph 6: 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 member of the public.

4.0 Title VI Procedures and Compliance

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Effingham County. may file a Title VI complaint by completing and submitting the county's Title VI Complaint Form (refer to Appendix E).

Effingham County investigates complaints received no more than 180 days after the alleged incident. Effingham County. will only process complaints that are complete.

Once the complaint is received, Effingham County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Effingham County has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Effingham County may contact the complainant. The complainant has ten (10) 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 ten (10) business days, Effingham County can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, Effingham County 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 Title VI violation and that the case will be closed. A 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, she/he

has ten (10) days to do so from the date of the closure letter or the LOF.

The complaint procedure will be made available to the public on Effingham County website (www.co.effingham.il.us).

4.2 Complaint Form

A copy of the complaint form is provided in Appendix E and on Effingham County website (www.co.effingham.il.us).

4.3 Record Retention and Reporting Policy.

Effingham County will submit Title VI Plans to IDOT any time a major change in the Plan occurs and to other funders as required.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring.

FTA Circular 4705.18, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

Effingham County has one sub-recipient listed below. Effingham County is required by FTA to ensure that sub-recipients of federal funds comply with all Title VI requirements. To meet this mandate, Effingham County's monitoring consists of collecting data through site visits, day-to-day technical assistance, and reports/forms. Effingham County uses reports and site visits to determine if the sub-recipients are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan.

Title VI Complaint procedures, Title VI Complaint Form, and a sample Title VI Notice have been developed and distributed by Effingham County to C.E.F.S. Effingham County also assists the sub recipients with demographic maps for Title VI purposes upon request.

Effingham County contracts with C.E.F.S. Economic Opportunity Corporation /Central Illinois Public Transportation.

4.5 Sub recipients and Subcontractors

Effingham County is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Effingham County, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations}, which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractors shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Illinois Department of Transportation and/or the Federal Transit Administration, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Illinois Department of Transportation, and/or the Federal Transit Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Effingham County shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the C.E.F.S., Illinois Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for non-compliance.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.18, Chapter /II, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 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 ; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Effingham County must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Effingham County in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted.

Effingham County has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. Any complaints would be listed below.

6.0 Public Participation Plan

FTA Circular 4702.18, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: 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 Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Effingham County was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process.

Current Outreach Efforts

- HSTP Meetings - participates in quarterly Human Service Transportation Plan meetings for Region 10 (Effingham County). Attended by Program Compliance and Oversight Monitor, Mobility Manager(s), Operations Manager, Program Manager and Program Director.
- Annual Public Hearing - takes place between February and April this is required by IDOT for public grant application reviews and input.
- Annual Customer Service Survey - conducted annually to survey demographics, trends and needs.
- Social Media- CIPT/ECPT maintains a Facebook page that engages the community in transportation facts, information, service updates/changes and events.
- Flyer Distribution- Mobility Manger and Drivers post flyers in public locations throughout our service area.
- Quarterly Public Advisory Meetings - conducted quarterly in Effingham County. Attended by public

Title VI Transportation Plan

Effingham County, IL

August 19, 2024

transportation staff, Program Compliance and Oversight Monitors, service providers, riders and general public.

- Presentations Mobility Manager(s) give informational presentations to groups/agencies upon request. Groups and agencies include but have not been limited to Family Life Center, Soyland Access to Independent Living, C.E.F.S. Head Start Events, Health Departments and Senior Living facilities.
- Informational Booths- Mobility Managers set up informational booths at area fairs and events. Attended but not limited to include C.E.F.S. Head Start Parent Nights, Health and Senior Fairs, Wellness Expo's, Education Fairs and Resource events.
- Attendance at Community Events -Participation by CIPT/ECPT staff (Mobility Managers/Drivers) at local community events, distributing informational materials. Events attended include but are not limited to C.E.F.S Outreach Open Houses, local parades and block parties, Church events and drive through flu clinics.
- Miscellaneous Outreach- 2023 partnerships with HSHS St. Anthony Memorial Hospital, Sarah Bush Lincoln Bonutti Clinic, Kirby's Foods, Truckstops of America, HSHS St. Anthony Medical Clinic, Save-a- Lot, Lake Pointe Apartments and Brookstone Estates in Effingham County to provide a deviated route system to the City of Effingham. 2023 partnership with Effingham and Clay County health department through the ARISE (Activating Relationships in Illinois for Systemic Equity) Grant to increase access to public transportation and participation in IRIS a local provider on-line referral system.

7.0 Language Assistance Plan

FTA Circular 4702.18, Chapter III, Paragraph 9: 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}.

Effingham County contracts with C.E.F.S. to operate a transit system within Effingham County in Illinois. The Language Assistance Plan (LAP) has been prepared to address Effingham County's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Effingham County's service area there are 0.74% or 238 residents who describe themselves as not able to communicate in English very well (Source: US Census). Effingham County does not have LEP groups which speak English less than "very well" which exceeds either 5.0% or 1,000 persons. Effingham County is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP.

Effingham County. has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G. The number and percentage of people who do not speak English very well can be found in Appendix H.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.18, Chapter III, Paragraph 10: 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.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population %	95.3	2.3	0.7	0.8	0.3	0.6
CEFS Board of Directors %	100	0	0	0	0	0

The Effingham County Board is an elected body. All citizens of Effingham County are encouraged to participate in county government by nominating and electing officeholders. Effingham County invites citizens to express their opinions and concerns to their Board Members.

9.0 Title VI Equity Analysis

FTA Circular 4702.18, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, 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.

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business 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 they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Effingham County will ensure the following:

1. Effingham County will complete a Title VI equity analysis for any facility 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. Effingham County will engage in outreach to persons potentially impacted by the siting of the facility. 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.
2. When evaluating locations of facilities, Effingham County will 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 level where appropriate to ensure that proper perspective is given to localized impacts.
3. If Effingham County determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Effingham County 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. Effingham County must demonstrate and document how both tests are met. Effingham County will 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.

Effingham County has not recently constructed any facilities but is in the beginning stages of planning for a new maintenance facility. Effingham County does not have any Title VI Equity Analysis reports to submit with this Plan.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.18, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Transportation services in Effingham County are not fixed route services.

11.0 Appendices

APPENDIX A: FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

APPENDIX B: CURRENT SYSTEM DESCRIPTION

APPENDIX C: TITLE VI PLAN ADOPTION MEETING MINUTES AND IDOT CONCURRENCE LETTER

APPENDIX D: TITLE VI SAMPLE NOTICE TO PUBLIC

APPENDIX E: TITLE VI COMPLAINT FORM APPENDIX F PUBLIC PARTICIPATION PLAN

APPENDIX G: LANGUAGE ASSISTANCE PLAN

APPENDIX H: OPERATING AREA LANGUAGE DATA: C.E.F.S. SERVICE AREA

APPENDIX I: DEMOGRAPHIC TABLE

APPENDIX J: TITLE VI EQUITY ANALYSIS

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub recipients shall submit the information below to their primary recipient (the entity from whom the sub recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)
- Including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the "major service change policy," disparate impact policy, and disproportionate burden policy

Appendix B

Current System Description

The goal of Effingham County Public Transportation's program is to provide reliable and timely transportation to residents of Effingham County by insuring punctuality, accessibility, courtesy, cleanliness, serviceability, and safety at all times to our riders. Effingham County contracts with C.E.F.S to provide this service.

C.E.F.S. Economic Opportunity Corporation is a non profit 501 (c) 3 Community Action Agency serving the Central Illinois counties of Christian, Clay, Effingham, Fayette, Montgomery, Moultrie and Shelby. C.E.F.S. provides public transportation for Effingham County and other surrounding counties, as well as 5311 grantees through a Purchase of Service Agreement. C.E.F.S. develops, implements, and evaluates social service programs to assist economically and socially disadvantaged people in their quest for greater self sufficiency. We offer programs as diverse as the needs of the people in the communities we serve. Central Illinois Public Transit the C.E.F.S. public transportation program. Their Chief Executive Officer is responsible for all day to day operations of the organization and reports directly to The Board of Directors. The Board of Directors is comprised of members from each of the counties C.E.F.S serves. The Board of Directors provides oversight in priorities and develop the fiscal, personnel, planning/evaluation and equal opportunity policies of the corporation.

The CIPT/ECPT Transportation Director is responsible to the Chief Operations Officer and Chief Executive Officer for the administration, leadership and oversight of the rural transportation system in accordance with funding source guidelines and agency policies. The C.E.F.S. Economic Opportunity Corporation's Chief Financial Officer is responsible for liability insurance for both IDOT, County, and agency owned vehicles, as well as vehicle registration renewal. All safety sensitive employees are required to complete IDOT approved safety and security training as part of their new hire orientation. Drivers complete a minimum of 80 hours of driver training which includes Defensive Driving, Emergency Procedures, Passenger Assistance/Customer Service. Driver training consists of vehicle introduction, behind the wheel training, pre/post trip inspections, and proper use of wheelchair lifts and securement devices. Drivers are recertified annually and renew Defensive Driving, Emergency Procedures and Passenger Assistance/Customer Service tri-annually.

Maintenance on all agency vehicles is managed by the Maintenance Supervisor. Repairs and maintenance consist of a combination of in house and outsourced services. All maintenance is performed under the guidelines of the Preventative Maintenance Plan which conforms to the IDOT Maintenance Guidelines. All vehicle records are kept on-site at our Shelby County Maintenance Facility, 1505 W. South 1st Street, Shelbyville, IL or at the Administrative Office, 1805 S. Banker Street, Effingham, IL and retained for seven years.

Central Illinois Public Transit employs a total of 44 employees that include: 23 full time drivers, 8 part time drivers, 7 substitute/casual drivers, 3 full time dispatchers, 4 full time administrative staff and 4 support staff.

Transportation employees that have completed all the required safety and drivers training requirements are eligible to drive passengers in agency vehicles. Vehicles above a 14-passenger capacity require a CDL license with passenger endorsement. CIPT currently has 22 trained drivers with passenger endorsement CDL's.

Central Illinois Public Transit provides demand response services in Christian, Clay, Effingham, Fayette, Montgomery, Moultrie and Shelby Counties in Central Illinois. The services are open to the public and have

no qualification criteria. Trips outside our service area are offered as requested and availability allows for medical purposes. Trips can be scheduled for any purpose but typically fall within the following categories: Medical, Employment, Education, Nutritional, Recreational, Social and Business. Our fleet includes mini-vans, 14-passenger Medium Duty Vans and 26-passenger Super Duty Buses. All vehicles are equipped with a lift and are ADA Complaint. Trips are prioritized on a first come, first serve basis. CIPT provides service 298 days per year and averages 374 rides per day, 6.1 miles per ride, 2,288 service miles per day and 196.1 service hours per day.

Passenger Handbook and more information can be found on the C.E.F.S website: (www.cefseoc.org). Effingham County Provides oversight and insures compliance of C.E.F.S. transportation program.

Appendix C

Title VI Plan Adoption

**Effingham County Title VI Transportation Plan
Resolution/Ordinance**

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI Effingham County Public Transportation

- Effingham County Public Transportation 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 Effingham County Board
- For more information on Effingham County's civil rights program, or to file a Title VI complaint, contact Kelly Lockhart, c/o Effingham County Board 101 N 4th Suite 301 Effingham IL 62401 Phone 217 342 4990 Email klockhart@co.effingham.il.us or visit the county website www.co.effingham.il.us
- You may also file your complaint with the FTA at Federal Transit Administration Office of Civil Rights, attention Title VI Program Coordinator, East Building 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, please contact 217-342-2193. Sise necesita información en otro idioma p6ngase en contacto con 217-342-2193.

Appendix E

Title VI Complaint Process

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Effingham County, may file a Title VI complaint by completing and submitting the Board's Title VI Complaint Form. Effingham County investigates complaints received no more than 180 days after the alleged incident. Effingham County will only process complaints that are complete.

Once the complaint is received, Effingham County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Effingham County has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, C.E.F.S. or Effingham County may contact the complainant. The complainant has ten (10) 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 ten (10) business days, Effingham County can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, Effingham County 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 Title VI violation and that the case will be closed. A 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, she/he has ten (10) days to do so from the date of the closure letter or the LOF.

The complaint procedure will be made available to the public on The Effingham County website (www.co.effingham.il.us)

Effingham County Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Google Translator	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If 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.			Yes	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"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____				
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 IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> 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:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

Signature _____ Date _____

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

Kelly Lockhart
 Effingham County Program Compliance and Oversight Monitor
 c/o Effingham Board
 101 N 4th St Suite 301
 Effingham IL 62401

Appendix F

Public Participation Plan (PPP)

Title VI Public Participation Plan

Effingham County shall strive to include minority and LEP (Limited English Proficiency) individuals in its decision making processes. This includes outreach to minority groups in Effingham County and its surrounding area.

Based on the demand for alternate language services, and considering the limited budget of the Effingham County programs, other activities and services that will be developed in the next three years include:

- o Transit surveys conducted by Effingham County will be available in Spanish
- o Future route maps will be available in English and Spanish (upon request)
- o Local translation services will be contacted and, if feasible, placed on retainer

Effingham County's outreach and marketing initiatives have yielded a list of community organizations that serve populations with limited English proficiency. The following list of community organizations will be contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

- o Effingham Unit 40 Schools
- o Effingham County Health Department

In addition to these activities, CIPT will continue to encourage public participation, especially from LEP communities, using the following strategies:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities, along our public transit routes
- Employing different meeting sizes and formats
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations.
- 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

Summary of Ongoing Public Participation Efforts and Outreach

Since the last Title VI reporting submission, Effingham County conducted the following public outreach and involvement activities:

All public meetings including transportation planning meetings are open to the general public. Accommodations are available for those with limited English proficiency if requested in advance of the meeting.

General Awareness and Phone Surveys

We conduct onboard rider and general awareness surveys frequently. The most recent ridership survey was completed in 2023.

The County can contact a Spanish enterpreter upon request.

Appendix F

Language Assistance Plan (LAP)

Effingham County has developed the following Language Assistance Plan to ensure meaningful access to program services for Limited English Proficient (LEP) individuals. An LEP individual 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, Effingham County completed the following Four Factor Analysis:

1) The number or proportion of LEP persons eligible to be served or likely to be encountered by Effingham County. According to the 2022 American Community Survey information detailing “Language Spoken at Home” (Table S1601) for Effingham County residents, there are zero LEP language groups that exceed the Safe Harbor Provision of 1,000 persons or five percent of the service area population, whichever is less. Specifically:

Language	<i>Individuals Who Speak English Less Than Very Well</i>	<i>Percent Who Speak English Less Than Very Well</i>
Spanish	354	1.09%
Other Indo-European languages	108	<1%
French, Haitian, or Cajun	23	<1%
Chinese	7	<1%
German	6	<1%
Korean	6	<1%
Russian	1	<1%

While Effingham County does not currently maintain non-English versions of documents, reasonable effort will be made to provide vital information to LEP individuals in the language requested.

CIPT rarely receives communications from non-English speaking persons. Public Transportation is important to Effingham County and we are committed to assisting non-English residents when necessary. Even though cost can be a prohibiting factor, Effingham County will continue to translate documents to Spanish when necessary.

Safe Harbor Provision for Written Translations

Effingham County will periodically update this Language Assistance Plan, including monitoring service area demographics for changes in LEP language groups. For any LEP language group that exceeds the Safe Harbor Threshold, written translations of the following vital documents will be made available:

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

Language Assistance Services

- Staff is provided a list of written and oral language assistance resources and how they may be obtained.
- Instructions are provided to customer service and other staff who take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to customer service and other staff who may receive written communication from the public on how to respond to written communication from an LEP person.
- Instructions are provided to vehicle operators and others who regularly interact with the public on how to interact with an LEP customer.

Notice to LEP Persons About the Availability of Language Assistance

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available
- Working with community-based organizations and other stakeholders to inform LEP individuals of services, including the availability of language assistance services
- Announcements at community meetings
- Information tables at local events

Monitoring, Evaluating and Updating the Language Assistance Plan

Effingham County will monitor this Language Assistance Plan by updating the 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. Depending on the feedback received, Effingham County 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.

Training Employees to Provide Timely and Reasonable Language Assistance to LEP Populations

- A summary of grant recipient responsibilities under the DOT LEP Guidance;
- A summary of the Language Assistance Plan;
- A summary of the number and proportion of LEP persons in the 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 is currently provided and instructions on how staff can access these products and services
- A description of cultural sensitivity policies and practices
- List other

Appendix H

Operating Area Language Data

	Effingham County, Illinois	
Label	Estimate	Margin of Error
Total:	32,332	±44
Speak only English	31,260	±208
Spanish:	723	±144
Speak English "very well"	369	±124
Speak English less than "very well"	354	±115
French, Haitian, or Cajun:	48	±42
Speak English "very well"	23	±23
Speak English less than "very well"	25	±38
German or other West Germanic languages:	27	±23
Speak English "very well"	21	±20
Speak English less than "very well"	6	±11
Russian, Polish, or other Slavic languages:	23	±25
Speak English "very well"	22	±24
Speak English less than "very well"	1	±4
Other Indo-European languages:	161	±128
Speak English "very well"	108	±85
Speak English less than "very well"	53	±58
Korean:	37	±31
Speak English "very well"	6	±9
Speak English less than "very well"	31	±32
Chinese (incl. Mandarin, Cantonese):	7	±12
Speak English "very well"	0	±26
Speak English less than "very well"	7	±12
Vietnamese:	4	±7
Speak English "very well"	4	±7
Speak English less than "very well"	0	±26
Tagalog (incl. Filipino):	23	±28
Speak English "very well"	23	±28
Speak English less than "very well"	0	±26
Other Asian and Pacific Island languages:	19	±29
Speak English "very well"	19	±29
Speak English less than "very well"	0	±26
Arabic:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26
Other and unspecified languages:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26

Appendix I

County Demographics

Demographics			
County	% Minority	% Limited English Proficiency	% Living Below Poverty
Effingham	2.7	0.74	11.6

Appendix J

Title VI Equity Analysis

Effingham County has not performed a Title VI Equity Analysis because we have not constructed any transportation related facilities.