

**Title VI Program**



Bloomington-Normal Public Transit System

d.b.a

Connect Transit

November 2014, updated January 2016

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## **Introduction**

This submission will assure that Bloomington-Normal Public Transit System d.b.a and henceforth known as Connect Transit has continued compliance with Title VI of the Civil Rights Act of 1964 and with U.S. Department of Transportation Title VI regulations (FTA Circular C 4702.1B) concerning Federal Transit Administration grants. A Triennial Review was conducted of BNPTS's Title VI program in 2012 and there were no findings.

## Title VI Compliance Document

### **Title VI Notice to the Public**

Connect Transit uses the following message to indicate the organization's ongoing compliance with Title VI:

"Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs & activities receiving Federal financial assistance (42 U.S.C. Section 200d.) Connect Transit is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with Connect Transit, 351 Wylie Drive, Normal, IL 61761."

This notice is placed in the Connect Transit Rider's Guide (Appendix 1) and in all Connect Transit Fixed Route Buses (Appendix 2), and prominently on the newly redesigned Connect Transit Website (Appendix 3). The Riders Guide is available on all Fixed Route buses and designated locations throughout Bloomington Normal including Connect Transit Headquarters (351 Wylie Dr.), Uptown Station (Normal), Bloomington City Hall, Normal Village Hall, and participating Connect Transit retail partners where passes and ride tokens may be purchased.

### **Title VI Complaint Procedure**

Connect Transit maintains the following Title VI complaint procedure on display on their website:

#### **"TITLE VI COMPLAINT PROCEDURES**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of color, or national origin in programs receiving federal financial assistance.

#### **General**

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin as noted below may file a written complaint with Connect Transit System's Equal Employment Opportunity personnel, 351 Wylie Drive, Normal, IL 61761. If the Complainant is dissatisfied with the resolution or the case is not being resolved in a timely manner, the complaint may be submitted to the Federal Transit Administration (FTA). Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI personnel may be utilized for resolutions. The EEO personnel will notify Connect Transit's General Manager of all Title VI related complaints as well as all resolutions.

#### **Procedures**

1. The complaint must meet the following requirements:
  - a. Complaint shall be in writing and signed by complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The

Complainant will be interviewed by the EEO personnel or official authorized to receive complaints. All complaints must, however, be signed by the Complainant or his/her representative.

- b. Include the date of the alleged act of discrimination when the Complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
  - d. Federal and state law requires complaints be filled within 180 calendar days of the alleged incident.
2. The Complainant will be provided with a written acknowledgement that Connect Transit has either accepted or rejected the complaint
3. A complaint shall be regarded as meriting investigation unless:
  - a. It clearly appears on its face to be frivolous or trivial.
  - b. Within the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.
  - c. Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
  - d. Other good cause for not investigating the complaint exists e.g. respondent is presently under investigation by another Federal agency.
4. In the event that the complainant or respondent has not submitted sufficient information to make determination Connect Transit may request additional information from either party. This request shall be made with 15 working days of the receipt of the complaint and will require that the party submit the information with 60 working days from the date of the designated time frame may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.
5. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:
  - a. Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
  - b. Citations of relevant Federal, State, and Local Laws, rules, regulations, and guidelines, etc.

- c. Description of the investigation, including a list of the persons contacted by the investigator and a summary of the interviews conducted; and
- d. A statement of the investigator’s findings and recommendations.

Send to:

Connect Transit  
Attn: Jenifer Clark  
351 Wylie Drive  
Normal, IL 61761”

**Title VI Complaint Form**

Appendix 4 contains the complaint form that Connect Transit utilizes for any Title VI inquiries.

**Title VI Investigations, Complaints, and Lawsuits**

Connect Transit currently has no active investigations by the Federal Transportation Administration (FTA) or entities other than the FTA, lawsuits, and/or complaints naming Connect Transit that allege discrimination on the basis of race, color, and/or national origin.

**Monitoring of Subrecipients**

Connect Transit does not have any subrecipients.

**Title VI Equity Analysis Completion**

No Title VI Equity Analysis has been completed as Connect Transit has not determined the site or location of facilities since the last Title VI submission.

**Minority Representation on Committees and Councils Selected by Connect Transit**

Connect Transit currently has one nonelected committee/council that has recently been developed since the last Title VI submission, a Diversity Committee. Participation on the committee was solicited internally based on interest among current employees. Given the recent creation of the committee, a number of processes and guidelines are still being formed. The racial makeup of the committee is as follows:

- 2 white females
- 2 black females
- 1 black male

**Public Participation Plan**

Connect Transit is committed to being excellent stewards of transit and community partners within the Bloomington-Normal Community. In accordance with this commitment, Connect Transit has implemented a pro-active public participation policy that solicits the input from the Bloomington-Normal area on a regular basis.

Prior to any change in policy or service, including but not limited to fare increases and a decrease in service hours, Connect Transit will host at least two (2) “listening sessions” to present the idea to the public. The listening sessions provide the public an opportunity to offer questions, comments, or voice concerns about the proposed changes.

The listening sessions are marketed on Connect Transit buses, social media, website, and distributed via press release to media outlets and community partners that include those listed below. The locations of the listening sessions are targeted to offer at least one opportunity in Bloomington or one opportunity in Normal. In some cases, if the proposed change affects a particular area, the listening session may be held in a nearby facility, such as an elementary school or other public building. The goal of the listening sessions is to solicit as much input as possible from concerned parties, while also allowing for an open dialogue of why the recommendations are being made. The location of each listening session, being set either in Bloomington or Normal or in a specific area, provides the opportunity for transit access to the forums, but also allows the affected populations, including LEP and minority populations, to participate more easily than at other locations.

Once feedback has been gathered, Connect Transit may use the input to shape or change the recommended item. Feedback gathered in the listening sessions will also be distributed to Connect Transit’s Board of Trustees prior to any hearing regarding a fare increase or decrease in service hours, as required by Connect Transit’s Procedure’s for Public Comment on Fare Increase and Major Service Changes.

If any policy or service change may affect the community, Connect Transit will also reach out to the business community, nonprofit and community organizations, area universities and colleges, and other governmental agencies in order to communicate the changes and answer any concerns. Relationships and exchanges with organizations that are new or ongoing include, but are not limited:

- City of Bloomington
- Town of Normal
- McLean County
- McLean County Regional Planning
- McLean County School District Unit 5
- Bloomington School District 87
- Illinois State University
- Illinois Wesleyan University
- Heartland College
- Lincoln College –Normal
- State Farm
- Country
- YMCA/YWCA McLean County
- Mid Central Community Action
- Salvation Army
- United Way
- Life Center for Independent Living

## Service Standards

### Vehicle Load Standards

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
30' Standard Bus	29	10	39	1.3
35' Low Floor Bus	31	10	41	1.3
40' Standard Bus	41	10	51	1.2

### Vehicle Headway Standards

Route	Hours of Operation - Monday - Friday	Hours of Operation - Saturday	Headway
A Green	6:25 AM – 9:40 PM	7:25 AM – 9:40 PM	30 Minutes
B Red	6:30 AM – 9:45 PM	7:30 AM – 9:45 PM	60 Minutes
C Purple	6:25 AM – 9:35 PM	6:45 AM – 9:35 PM	60 Minutes
D Pink	6:55 AM – 8:55 PM	7:55 AM – 8:55 PM	60 Minutes
E Blue	6:25 AM – 9:25 PM	6:40 AM – 9:25 PM	30 Minutes
F Brown	6:05 AM – 10:05 PM	7:05 AM – 9:45 PM	60 Minutes
G Yellow	6:00 AM – 9:15 PM	7:00 AM – 9:15 PM	60 Minutes
H Orange	6:45 AM – 9:45 PM	7:35 AM – 9:45 PM	60 Minutes
I Lime	6:55 AM – 9:38 PM	6:55 AM – 9:38 PM	60 Minutes
J Teal	6:45 AM – 8:15 PM	7:45 AM – 8:15 PM	30 Minutes
K Aqua	6:25 AM – 9:25 PM	6:55 AM – 9:25 PM	60 Minutes

### On Time Performance

Connect Transit strives to run ninety-five (95) percent of its transit vehicles on time, which means within 5 minutes of the scheduled/published timetables. Connect Transit continuously monitors on-time performance and system results are published and posted as part of monthly performance reports to the Board of Trustees.

### Service Availability Standards

Connect Transit currently provides transit service by operating a “flag stop” system, where a passenger may board the bus at any street corner that the driver deems safe.

## Service Policies

### **Vehicle Assignment**

The process for morning pull out and bus route assignments rotates on a daily basis. This rotation is designed to aid in maintaining a good state of repair on all company owned vehicles. Buses are assigned specific parking rows based on bus size and fleet continuity. Buses that are scheduled for maintenance and repairs are held in the maintenance garage or in a designated “out of service” row. Those not being held in for maintenance are parked in their designated rows and available for revenue service. Each morning, Dispatch is given a list of what is available for service and the order of which the buses are parked. From there, route structure is taken in to consideration. Due to safety concerns 35’ and 40’ buses will not work on certain routes. As each route is scheduled to depart, the dispatcher looks at the route and assigns a bus based on size and availability. Once all routes are filled and pull out has occurred the remaining buses in the parking garage are pulled forward and ready to be used as spares or the next morning pull out and assignment.

All buses are equipped with air conditioning, automated passenger announcements, and other similar amenities.

### **Transit Amenities**

Connect Transit’s installation of amenities is currently limited to four (4) designated transfer centers and a number of stops related to commercial activity and/or multi-family housing. Connect Transit is undertaking a review of its current transit amenities and will be updating the priority of availability based on demand as determined by ridership. Connect Transit also continues to encourage private investment in transit amenities, such as employers, retail facilities, and colleges/universities, in order to improve accessibility to their locations via transit.

## Limited English Proficiency (LEP) – Language Assistance Plan Four Factor Analysis

### **Factor 1**

#### Task 1, Step 1

Connect Transit's experiences with Limited English Proficiency (LEP) Individuals have been infrequent and limited. While it is clear that Connect Transit serves riders with LEP and the Bloomington-Normal area is becoming increasingly diverse, interactions where translation services are required have been limited to a couple instances a year.

Operations Supervisors, who supervise Bus Operators and Dispatchers, indicate that all of Connect Transit's interfaces with LEP individuals have been with Spanish speaking riders. Interactions, although very rare, typically occur when the bus is in service between the operator and the rider. Connect Transit has had no instances of LEP individuals contacting dispatchers over the phone for items such as customer service, Connect Mobility paratransit services, or otherwise. Connect Transit employs a number of Spanish speaking staff that can handle translation when required. When instances requiring translation do occur while buses are on route, they are handled via radio to a Connect Transit employee who then translates.

Connect Transit has not received any written correspondence or electronic inquiries where LEP services would be required.

#### Task 1, Step 2A

Currently, Connect Transit's service area is defined by the city limits of Bloomington and Normal.

#### Task 1, Step 2B

Data from the 2008-2012 American Community Survey estimates the population of Bloomington and Normal over the age of 5 and the language that is spoken at home as follows:

<b>2008-2012 American Community Survey, Language Spoken at Home for Population 5 years and over</b>						
	<b>Bloomington, IL</b>		<b>Normal, IL</b>		<b>Combined Bloomington and Normal, IL</b>	
	<u>Total</u>	<u>%</u>	<u>Total</u>	<u>%</u>	<u>Total</u>	<u>%</u>
<b>Population 5 years and over</b>	71,089		50,095		121,184	
<b>English only</b>	63,304	89.0%	46,921	93.7%	110,225	91.0%
<b>Language other than English</b>	7,785	11.0%	3,174	6.3%	10,959	9.0%
<b>Speak English less than "very well"</b>	2,686	3.8%	872	1.7%	3,558	2.9%
<b>Spanish</b>	2,402	3.4%	1,238	2.5%	3,640	3.0%
<b>Speak English less than "very well"</b>	963	1.4%	251	0.5%	1,214	1.0%
<b>Other Indo-European languages</b>	3,113	4.4%	792	1.6%	3,905	3.2%
<b>Speak English less than "very well"</b>	1,127	1.6%	130	0.3%	1,257	1.0%
<b>Asian and Pacific Islander languages</b>	2,180	3.1%	1,042	2.1%	3,222	2.7%
<b>Speak English less than "very well"</b>	564	0.8%	476	1.0%	1,040	0.9%
<b>Other languages</b>	90	0.1%	102	0.2%	192	0.2%
<b>Speak English less than "very well"</b>	32	0.0%	15	0.0%	47	0.0%

Task 1, Step 2C

According to the ACS data above, 3,558 individuals speak English less than “very well” which equals about 2.0% of the population. The languages where individuals speak English less than “very well” are more or less equally proportioned among Spanish (1,214, 1%), Other Indo-European Languages (1,257, 1%), and Asian and Pacific Islander Languages (1,040, 0.9%).

This is a noticeable uptick from 2000 Census Data, where Spanish was the largest language spoken among individuals with Limited English Proficiency.

Task 1, Step 2D

Connect Transit’s service area currently provides service in and/or adjacent to the following Census Tracts in Bloomington-Normal:

McLean County, Illinois Census Tracts: 1.02, 1.04, 1.05, 2, 3.01, 3.02, 4, 5.01, 5.02, 5.04, 5.05, 11.03, 11.04, 11.05, 11.06, 12, 13.01, 13.02, 13.03, 14.02, 14.03, 14.04, 15, 16, 17, 18, 21.01, 51.01, 54, 58, 59.

Using the ACS 2008-2012 5 Year Data, the area average for percentage of the population 5 years and over that speaks English less than “very well” is 2.9%. Using this baseline, the highlighted census tracts exceed the 2.9% average.

<b>ACS 2008-2012 5 Year Data Estimates</b>	
<u>Census Tract</u>	<u>% of Population 5 Years and over that Speak English Less than "Very Well"</u>
1.02	0.37%
1.04	4.07%
1.05	2.37%
2	1.03%
3.01	2.84%
3.02	1.10%
4	0.46%
5.01	0%
5.02	0.36%
5.04	0.32%
5.05	1.59%
11.03	4.05%
11.04	3.70%
11.05	3.18%
11.06	4.29%
12	0.38%
13.01	3.42%
13.02	1.51%
13.03	2.63%
14.02	1.40%
14.03	1.33%
14.04	4.26%
15	0.00%
16	0.21%
17	4.67%
18	2.85%
21.01	9.54%
51.01	5.71%
54	0.35%
58	10.63%
59	1.98%

Using the same data source, the language with the largest number of speakers over the age of 5 that speak English less than “very well” for each of the highlighted census tracts are as follows:

- 1.04 – Chinese
- 11.03 – Spanish
- 11.04 – Gujarati
- 11.05 – Other Asian Languages
- 11.06 – Spanish

- 13.01 – Spanish
- 14.04 – Spanish
- 17 – Spanish
- 21.01 – Spanish
- 51.01 – Other Indic Languages
- 58 – Hindi

From the data, Spanish continues to appear as the most widely dispersed LEP language, with languages with Indian origins in some specific areas of Bloomington Normal. Lastly, there appears to be one census tract where a Chinese is the language with the largest number of LEP individuals.

Task 1, Step 3

Using the National Center for Education Statistics, the estimated population for LEP individuals enrolled in both school districts within Connect Transit’s service area (Unit 5 and District 87) are as follows:

**McLean County Unit School District 5, IL**  
*ACS Profile 2008-2012 - Language Spoken at Home*

Estimate	Margin of Error	Percent	Margin of Error	
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	14,870	+/-569	n/a	n/a
English only	13,575	+/-624	91.30%	+/-2.0
Language other than English	1,300	+/-297	8.70%	+/-2.0
Speak English less than "very well"	275	+/-117	1.80%	+/-0.8
Spanish	680	+/-260	4.60%	+/-1.7
Speak English less than "very well"	125	+/-76	0.80%	+/-0.5
Other Indo-European languages	235	+/-105	1.60%	+/-0.7
Speak English less than "very well"	45	+/-54	0.30%	+/-0.4
Asian and Pacific Islander languages	385	+/-125	2.60%	+/-0.8
Speak English less than "very well"	105	+/-88	0.70%	+/-0.6
Other languages	0	+/-27	0.00%	+/-0.2
Speak English less than "very well"	0	+/-27	0.00%	+/-0.2

**Bloomington School District 87, IL**  
*ACS Profile 2008-2012 - Language Spoken at Home*

Estimate	Margin of Error	Percent	Margin of Error	
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	6,865	+/-524	n/a	n/a
English only	6,385	+/-525	93.00%	+/-2.1

Language other than English	480	+/-146	7.00%	+/-2.1
Speak English less than "very well"	50	+/-30	0.70%	+/-0.5
Spanish	210	+/-85	3.10%	+/-1.2
Speak English less than "very well"	20	+/-22	0.30%	+/-0.3
Other Indo-European languages	220	+/-106	3.20%	+/-1.6
Speak English less than "very well"	20	+/-22	0.30%	+/-0.3
Asian and Pacific Islander languages	50	+/-45	0.70%	+/-0.7
Speak English less than "very well"	10	+/-13	0.10%	+/-0.2
Other languages	0	+/-24	0.00%	+/-0.4
Speak English less than "very well"	0	+/-24	0.00%	+/-0.4

#### Task 1, Step 4A

LEP persons are served by many organizations in the community, college, and university campuses in Bloomington-Normal. Connect Transit has relationships with organizations that are new or ongoing include, but are not limited to:

- McLean County
- City of Bloomington
- Town of Normal
- Illinois State University
- Illinois Wesleyan University
- Heartland Community College
- Lincoln College
- State Farm
- Country Insurance
- YMCA/YWCA McLean County
- Mid Central Community Action
- Salvation Army

#### Task 1, Step 4B

The following organizations that are involved with serving LEP populations have been contacted by Connect Transit:

- Heartland Community College
- Illinois State University
- Illinois Wesleyan University
- Lincoln College
- YMCA McLean County
- YWCA McLean County
- Salvation Army
- Bloomington Public Library

- Mid Central Community Action
- State Farm
- Conexiones Latinas de McLean County
- McLean County Indian Association
- Normal Public Library
- McLean County Human Services
- Western Avenue Community Center
- United Way

#### Task 1, Step 4C

Connect Transit has submitted an email survey to list in Task 1, Step 4b to which one response was received. The results indicated that while the organization does LEP populations, the frequency of the encounter varies, along with uncertainty on whether the population is utilizing transit.

In the day to day operations and dealings of Connect Transit and its existing relationships, the LEP populations who speak Spanish and Indo-European languages are the most likely to utilize transit and require LEP services.

#### **Factor 2**

#### Task 2, Step 1

Connect Transit operates fixed-route information and paratransit service in the community, with the vast majority of its customers utilizing the fixed route service. The two most important areas in the use of fixed route service which involve language skills are the trip planning and in trip information. To utilize the bus service, an individual needs to determine the bus route, time, and location to catch the bus. During the trip, an LEP person may not require speaking or understanding English, however, it may be required to deal with unusual situations.

Paratransit service has a different set of requirements. In order to be eligible for service, an individual must submit an application and be approved. English language skills are necessary for this process, but many agencies provide assistance in this process. In addition, family members provide assistance in this process for many applicants. Once approved, an individual must make a telephone reservation for each trip. Language skills are required for this process, but another person, such as a family member or agency, can make his reservation on behalf of the user. No language skills are necessary during the trip. The service is designed to provide transit for people with a wide variety of disabilities, including persons with severe cognitive disabilities who do not speak or understand any language. The rider must have their identification card to ride and their pick-up and drop-off locations are provided to the driver during the reservation process.

#### Task 2, Step 2

Based on the process indicated in Task 1, Step 4C, Connect Transit received information; the results indicated that while the organization does LEP populations, the frequency of the encounter varies, along with uncertainty on whether the population is utilizing transit.

In the day to day operations and dealings of Connect Transit and its existing relationships, the LEP populations who speak Spanish and Indo-European languages are the most likely to utilize transit and require LEP services.

### Task 2, Step 3

In communication with organizations that interact with LEP populations. While it is certain that LEP populations utilize Connect Transit, Connect Transit will continue to communicate and network within its current network of community organizations to determine if LEP populations are facing difficulty accessing Connect Transit from their perspective

### **Factor 3**

#### Task 3, Step 1

Connect Transit's most critical services are its fixed routes services. If limited English proficiency is a barrier to using this service, an LEP person's mobility without access to a vehicle, may be limited.

Critical information may include route and schedule information, fare and payment information, how to ride, public service announcements, and communications affecting route detours.

#### Task 3, Step 2

Concentrations of Spanish-speaking and other Indo-European Language riders use Connect Transit fixed route service. Based on the information collected, Spanish speaking riders are more spread throughout the service area, with Indo-European language riders concentrated in the southeast section of Connect Transit's service area, focused around the State Farm campuses. These populations are most frequent on the Purple C, Orange H, and Teal J routes.

### **Factor 4**

#### Task 4, Step 1

Connect Transit recently redesigned its website to include translations capabilities for more than 50 languages. This capability was instrumental in the redesign, and the design was selected knowing the capability to translate. This effectively translates all information on the website, which includes rider's guides, schedules, detour information, news, and much more.

Connect Transit is also in the process of incorporating the updated route and schedule information printed in Spanish, along with a rider's guide in Spanish.

The cost to maintain these measures is marginal. The website is \$0 ongoing because it was included in the redesign, and printing materials should not be more the \$2,000 annually.

#### Task 4, Step 2

Given the relatively small population of LEP individuals, Connect Transit will continue to monitor how it offers critical information for languages other than English. With the hiring of additional bi-lingual staff, Connect Transit will be able to translate additional materials into Spanish as necessary or requested by Community Organizations or groups.

Connect Transit will also work closer with the South Asian population and identify organizations that serve them such as State Farm and the McLean County Indian Association in Bloomington Normal to determine what information should be translated, if necessary, and what language it should be translated into, given the diverse linguistic background for people of that origin.

Issues related to LEP persons should be included in the training of Bus Operators and Dispatch staff, as well as administration.

#### Task 4, Step 3

Given the current situation of LEP populations in Bloomington Normal, most of the cost associated with translation services or items can be internalized into existing operations and staff members. Given the large institutional presence and spirit of partnership with in Bloomington Normal, partnerships with Universities and large employers can help defray one-time translation costs for printed materials, such as rider's guides.

As additional needs are brought to the attention of Connect Transit, resources will be allocated as deemed necessary to serve LEP populations and provide access.

#### Task 4, Step 4

As mentioned in Step 3, Connect Transit is fortunate to be in an area with large universities and employers that can help provide assistance with written and possible oral translation assistance. Continued communication and outreach among community partners will be key in order to identify additional opportunities to serve LEP populations.

## Implementation Plan on Language Assistance

Connect Transit has conducted this analysis to meet the requirements under the Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person shall, on the ground of race, color, or national origin, be excluded for participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the FTA.

### Task 1

Based on the included “Four Factor Analysis,” and according to the ACS data above, 3,558 individuals speak English less than “very well” that equals about 2.0% of the population (121,184). The languages where individuals speak English less than “very well” are more or less equally proportioned among Spanish (1,214, 1%), Other Indo-European Languages (1,257, 1%), and Asian and Pacific Islander Languages (1,040, 0.9%).

Similarly, from the “Four Factor Analysis” Connect Transit’s experiences with Limited English Proficiency (LEP) Individuals have been infrequent and limited. While it is clear that Connect Transit serves many riders with LEP and the Bloomington-Normal area is becoming increasingly diverse, interactions where translation services are required have been limited to a couple instances a year.

Operations Supervisors, who supervise Bus Operators and Dispatchers, indicate that all of Connect Transit’s interfaces with LEP individuals have been with Spanish speaking riders. Interactions, although very rare, typically occur when the bus is in service between the operator and the rider. Connect Transit has had no instances of LEP individuals contacting dispatchers over the phone for items such as customer service, Connect Mobility paratransit services, or otherwise. Connect Transit employs a number of Spanish speaking staff that can handle translation when required. When instances requiring translation do occur while buses are on route, they are handled via radio to a Connect Transit employee who then translates.

Connect Transit has not received any written correspondence or electronic inquiries where LEP services would be required.

### Task 2

There are numerous language assistance measures currently available to LEP persons, including both oral and written language services. There are also various ways in which Connect Transit staff responds to LEP persons, whether in writing or by telephone.

Available language assistance measure includes:

- Website that may be translated into over 50 languages;
- Language assistance for Spanish Speaking LEP persons via Connect Transit bus operator and Planner and staff help;

- Network among local organizations and institutions that provide services to LEP individuals and seek opportunities to provide information on Connect Transit printed materials.

Staff who encounters LEP individuals via telephone typically rely on family of LEP individuals to translate for the concerned party. Spanish speaking LEP individuals can also be forwarded to staff with Spanish language skills.

Written correspondence that requires translation can be worked out among Connect Transit's network of community partners, especially those in the academic community.

Vehicle operators who encounter LEP customers also may utilize dispatch to communicate the issue and try to troubleshoot, especially if the user is Spanish speaking. If this is not possible, or the individual does not speak Spanish, the Operator may resort to utilizing another passenger with language skills or indicate on printed material relevant route or schedule information.

Although Connect Transit has not documented a situation where an LEP customer required language assistance aside from Spanish, Connect Transit will continue to evaluate services such as a Language Line, if other LEP populations continue to face difficulty accessing transit.

#### Task 3, Step 1

The Connect Transit staffs most likely to encounter LEP populations are the bus operators and the dispatchers. Although administration and management are not likely to come in to contact with LEP populations, they will also be made aware of the LEP plan.

#### Task 3, Step 2

Training opportunities for staff, especially bus operators, can be tied to training of new drivers, which typically happens about twice a year. By having this type of training twice a year, this allows for drivers, dispatchers and management to cycle in and stay abreast of any changes to the LEP possibilities.

#### Task 3, Step 3

Connect Transit staff will be developing LEP guideline that will emphasize Connect Transit's responsibilities under the DOT LEP guidance, the current plan for interacting with LEP populations, and provide a grounds for interaction between drivers who may interact with LEP populations most frequently and management, who can design and adjust the LEP populations training.

#### Task 4

Connect Transit will incorporate a variety of methods to communicate with transit users and the public about language assistance. Connect Transit will continue to develop and network with community partners that provide services to LEP person. Connect transit will place statements of notice that interpreter services are available for meetings, with seven days' notice. Notice can also be made through signs and handouts available in vehicles, press releases, and information tables at local events.'

#### Task 4, Step 2

Connect Transit will also include language assistance information in updated rider's guides, on its website, and on new communications where LEP populations may be affected.

#### Task 4, Step 3

Connect Transit will also make the language assistance information available to local community organizations that provide services to LEP populations.

#### Task 5

Connect Transit will continue to update its language assistance plan as required by the FTA. The plan will be reviewed as needed to include any dramatic changes to the community or areas where additional language assistance can help existing or potential riders of Connect Transit. As Connect Transit continues to grow, both in ridership and staff, additional services may become necessary and may be easier to provide moving forward.

## Appendices

### Appendix 1 – Title VI Civil Rights Notice from Rider’s Guide (Page 9)

#### Rules of the Road

##### DO

- Wear proper clothing. Shirt and shoes are required. Take a seat, if available, and remain seated while the bus is in motion.
- Give your seat to persons who because of age or physical condition, are less able to stand than you are.
- Remove infants and parcels from strollers, and have the strollers folded before boarding the bus.
- Keep strollers, carts, and parcels out of the aisle. Limit your parcels to a reasonable number.
- Have fare ready before you board.

##### DONT

- Eat or drink on the bus.
- Smoke or chew tobacco.
- Play a personal listening device loud enough for others to hear it.
- Use loud or offensive language.
- Block aisles or doorways.
- Put your hands out the windows or throw anything out the window.
- Bring animals on the bus, except service animals assisting persons with disabilities or animals inside cages.

#### Bike Racks

All Connect Transit fixed route buses are equipped with bike racks. The racks allow a bike rider to mount their bike to a rack on the front of the bus when riding a bus. Each bike rack accommodates two bikes and there is no extra charge for your bike. Children 10 and younger must be accompanied by an adult to load and unload bikes. All people using the rack must be strong enough to load and unload their bike. Bikes are not allowed inside the bus.

##### Loading your bike:

- As the bus approaches, have your bike ready to load; remove all pumps, water bottles and loose items that could fall off.
- Always approach the bus from the curb side.
- Tell the bus driver that you are loading a bike.

- For safety reasons, the driver can not get off the bus to assist you.
- Squeeze handle and pull down to release folded bike rack.
- Lift bike onto the rack, putting the front and rear wheels in the marked slots. Please load the rack nearest the bus first. You can load/unload rack nearest the bus without unloading the bike in front.
- Raise the support arm, as far up on the wheel as you can, making sure it is resting on your front tire, not on the fender or frame.

##### Leaving the bus:

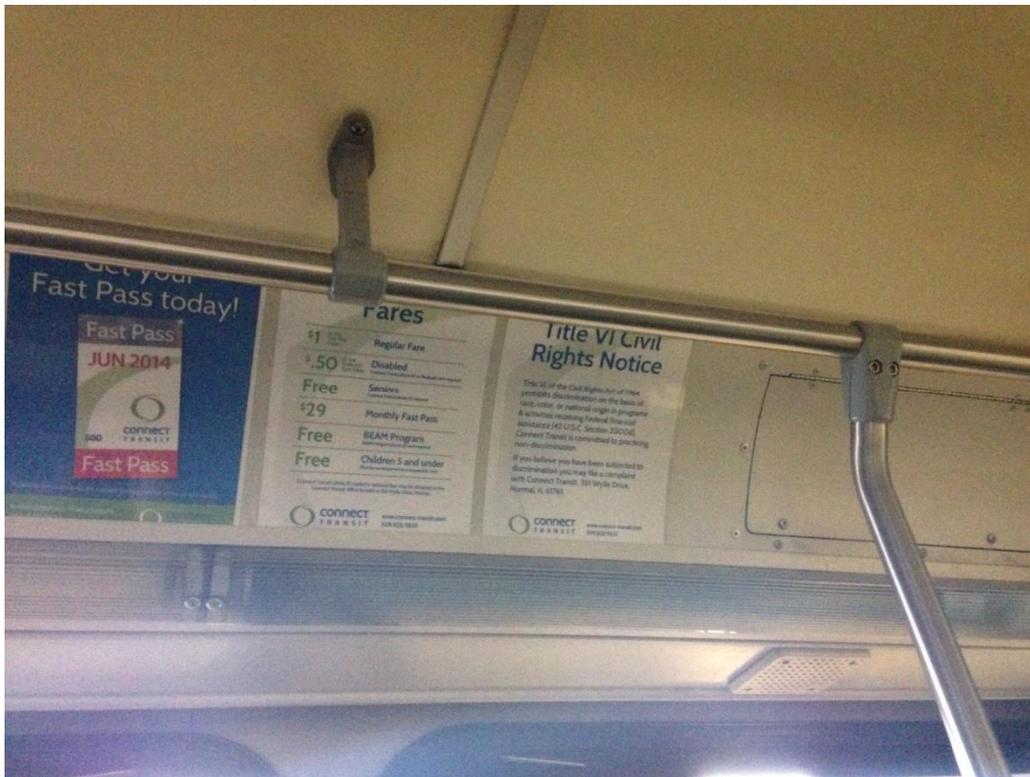
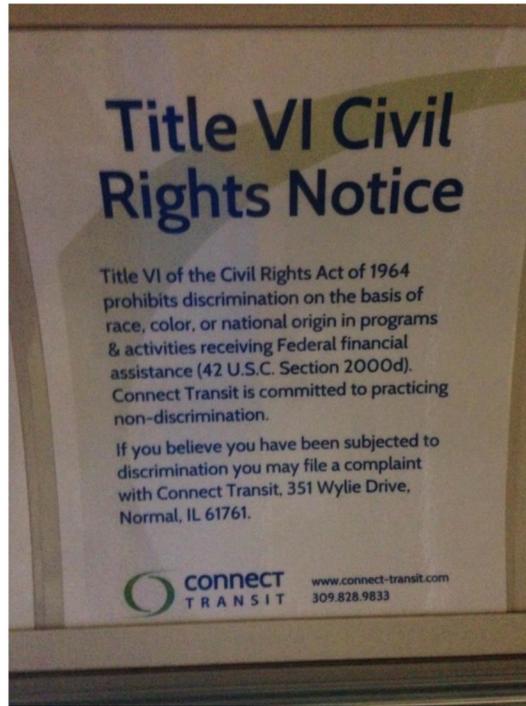
- Tell the driver you need to unload your bike.
- Move the support arm down and kick out your bike.
- Please fold up the rack if it is empty by squeezing the handle and lifting the rack into the closed position.

#### Title VI Civil Rights Notice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs & activities receiving Federal financial assistance (42 U.S.C. Section 2000d). Connect Transit is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with Connect Transit, 351 Wylie Drive, Normal, IL 61761.



Appendix 2 – Title VI Civil Right Notice posted in Fixed Route Buses



## Appendix 3 – Title VI Civil Rights Notice on Connect Transit Website

Home » About » Diversity » Title VI & Title VII

Email Print

### Navigation

- Diversity Home
- Diversity Council
- Title VI & Title VII



Community Happenings



News and Media Info

## Title VI & VII

Connect Transit is committed to providing equal opportunity and service equity to its customers as protected by Title VI and Title VII of the Civil Rights Act of 1964 ("Title VI" and "Title VII") meaning the Connect Transit does not discriminate on the basis of actual or perceived race, color, or national origin as required by federal law. Connect Transit has also adopted a non-discrimination policy that include in addition to race, color, and national origin, Connect Transit does not discriminate on the basis of creed, religion, sex, gender identity, marital status, national origin, sexual orientation, ancestry, age, military status, and physical or mental disability and any other basis protected by state or local law.

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a complaint with Connect Transit. A complaint must be filed within 180 days after the date of the alleged discrimination.

Please click [HERE](#) to view the complaint procedure and [HERE](#) to access the Title VI complaint form, to file a complaint with Connect Transit, or contact Jenifer Clark at -309-829-1122.

In addition to your right to file a complaint with Connect Transit, you have the right to file a Title VI or Title VII complaint with the, Federal Transit Administration Headquarters, 1200 New Jersey Ave SE, Washington, D.C. 20590.

Appendix 4 – Title VI Complain Form



**TITLE VI Complaint Form**  
Connect Transit  
Office of Civil Rights

Connect Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If required any assistance in completing this form, please contact the Title VI Coordinator by calling (309) 829-1124. The completed form must be returned to Andrew Johnson, Connect Transit General Manager, 351 Wylie Dr, Normal, IL 61761.

Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
Street Address: \_\_\_\_\_ Alt Phone: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_

Person(s) discriminated against (if someone other than complainant): \_\_\_\_\_

Name(s): \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_

Date of incident: \_\_\_\_\_

Which of the following best describes the reason for the alleged discrimination to place?  
(Circle one)

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

Please describe the alleged discrimination incident. Provide the names and title of all Metro employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space required.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

351 Wylie Drive | Normal, Illinois 61761 | connect-transit.com | info@connect-transit.com | 309.829.9833



Have you filed a complaint with any other federal, state, or local agencies? (Circle one)

Yes / No

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

Agency: Contact Name:

Street Address, City, State & Zip Code: Phone:

Agency:  
Street Address,  
Phone:

Contact Name:  
City, State & Zip Code:

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

Complainant's Signature:

Date:

Print or Type Name of Complainant

Date Received: \_\_\_\_\_

Received By: \_\_\_\_\_