

C.E.F.S. Economic Opportunity Corporation

Title VI Transportation Plan



C.E.F.S. Economic Opportunity Corporation
1805 South Banker Street
P.O. Box 928
Effingham, IL 62401-0928
217/342-2193
e-mail: cefs@cefseoc.org
website: www.cefseoc.org

Effective November 2, 2023

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

49 CFR Part 21.7(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].

C.E.F.S 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.

C.E.F.S. 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 recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Chief Executive Officer or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout C.E.F.S's organization 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 C.E.F.S.
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 agency'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 agency.

Signature: _____

Printed Name: _____

November 2, 2023

2.0 Introduction & Description of Transportation Services

C.E.F.S. 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.

C.E.F.S. is a sub-recipient of FTA funds and provides service in Clay, Effingham, Fayette, Shelby, Moultrie, Montgomery and Christian counties in Illinois. A description of the current Central Illinois Public Transit system is included in Appendix B.

Title VI Liaison Contact Information

Liaison Jamie Brown
C.E.F.S. Economic Opportunity Corporation
1805 South Banker Street, Effingham IL 62401
217.342.2193

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 4702.1B, 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.

C.E.F.S. 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 C.E.F.S.'s Board of Directors on November 2, 2023. A copy 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 C.E.F.S.'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 C.E.F.S. Central Office and all Outreach Offices, CIPT Dispatch Office, public transportation vehicles and on our website at www.cefseoc.org.

4.0 Title VI Procedures and Compliance

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.

4.1 Complaint Procedure

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

Once the complaint is received, C.E.F.S. 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.

C.E.F.S. has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, C.E.F.S. 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, C.E.F.S. 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, C.E.F.S 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 C.E.F.S. website: www.cefseoc.org

4.2 Complaint Form

A copy of the complaint form is provided in Appendix E and on C.E.F.S. website (www.cefseoc.org).

4.3 Record Retention and Reporting Policy

C.E.F.S. will submit Title VI Plans to IDOT for concurrence on an annual basis or 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 4705.1B, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

C.E.F.S. does not have any sub-recipients to provide monitoring and assistance to.

As a sub-recipient to IDOT, C.E.F.S. utilizes the sub-recipient assistance and monitoring provided by IDOT, as needed. In the future, if C.E.F.S. has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, 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), C.E.F.S. 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 C.E.F.S. 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.

C.E.F.S. 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.

Table 1: Sample form for summary of Investigations, Lawsuits, and Complaints.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, 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 C.E.F.S. 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. The PPP is included as Appendix F.

Current Outreach Efforts

HSTP Meetings – participates in quarterly Human Service Transportation Plan meetings for Regions 7 (Christian County), 8 (Moultrie and Shelby Counties), 9 (Fayette and Montgomery Counties), and 10 (Effingham and Clay Counties). Attended by Mobility Manager(s), Operations Manager, Program Manager and Program Director.

Interagency Meetings – Mobility Manager(s) participates in monthly/quarterly Interagency Meetings in Christian, Clay, Effingham, Fayette, Montgomery, Moultrie and Shelby Counties including the Effingham County Council on Aging.

Annual Public Hearing – takes place between February and April. 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 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.

Bi-Annual Community Forums – conducted bi-annually in Christian, Clay, Effingham, Fayette, Montgomery, Moultrie and Shelby Counties. Attended by public 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, Fayette County's YMCA for Healthy Kids Day, Health and Senior Fairs, Wellness Expo's, Education Fairs and Resource events.

Attendance at Community Events -Participation by CIPT 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 4702.1B, 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).

C.E.F.S. operates a transit system within Clay, Effingham, Fayette, Shelby, Moultrie, Montgomery and Christian counties in Illinois. The Language Assistance Plan (LAP) has been prepared to address C.E.F.S.'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

C.E.F.S.'s service area there are 0.77% or 1097 residents who describe themselves as not able to communicate in English very well (Source: US Census). CEFS does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person. C.E.F.S. 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.

C.E.F.S. 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 4702.1B, 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	95.7%	2.0%	2.3%	0.57%	0.31%	0.88%
CEFS Board of Directors	100%	%	%	%	%	%

Data source: Census Quick Facts for seven counties, then averaged.

C.E.F.S. will make efforts to encourage minority participation on the Board. Agency members are active in their local communities and have established relationships with other human service providers and businesses. Staff attend inter-agency meetings, attend health and information fairs to share information on our services. These events provide an opportunity to encourage minority participation in our programs and on our Board.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, 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, C.E.F.S. will ensure the following:

1. C.E.F.S. 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. C.E.F.S. 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, C.E.F.S. 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 C.E.F.S. determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, C.E.F.S. 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. C.E.F.S. must demonstrate and document how both tests are met. C.E.F.S. 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.

C.E.F.S. has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, C.E.F.S. does not have any Title VI Equity Analysis reports to submit with this Plan. C.E.F.S. will utilize the demographic maps included in Appendix I for future Title VI analysis.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, 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.

C.E.F.S. is not a fixed route service provider.

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 C.E.F.S. Economic Opportunity Corporation's Central Illinois Public Transit's public transportation program is to provide reliable and timely transportation to residents of each county we serve by ensuring punctuality, accessibility, courtesy, cleanliness, serviceability, and safety at all times to our riders.

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 and Shelby counties 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. Our Chief Executive Officer is responsible for all day to day operations of our organization and reports directly to our Board of Directors. Our Board of Directors is comprised of members from each of the counties we serve. The Board of Directors provides oversight in priorities and develops the fiscal, personnel, planning/evaluation and equal opportunity policies of the corporation.

The CIPT 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 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 employees a total of 44 employees that include: 23 full time drivers, 7 part time drivers, 3 substitute/casual drivers, 4 full time dispatchers, 4 full time administrative staff and 5 support staff (Mobility Manger, Driver Trainer, 3 Maintenance 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. We currently have 17 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. Our 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 our website: www.cefseoc.org

Appendix C
Title VI Plan Adoption
C.E.F.S. Economic Opportunity Corporation
Title VI Transportation Plan
Signature Authorization Page



Chuck Buchanan
CEFS Board Chair

11/2/2023
Date



Kevin Bushur
CEFS Chief Executive Officer

11/2/2023
Date

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

CENTRAL ILLINOIS PUBLIC TRANSIT

- Central Illinois Public Transit 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 Central Illinois Public Transit.
- For more information on Central Illinois Public Transit's civil rights program, or to file a Title VI complaint, contact Jamie Brown at C.E.F.S. Economic Opportunity Corporation, 1805 S. Banker Street, P.O. Box 185, Effingham, IL 62401. Phone 217-342-2193 Ext. 170. Email jbrown@cefseoc.org or visit our website at <https://www.cefseoc.org/transportation-services>.
- 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. Si se necesita información en otro idioma póngase 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 C.E.F.S. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form . C.E.F.S. investigates complaints received no more than 180 days after the alleged incident. C.E.F.S. will only process complaints that are complete.

Once the complaint is received, C.E.F.S. 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.

C.E.F.S. has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, C.E.F.S. 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, C.E.F.S. 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, C.E.F.S 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 C.E.F.S. website: www.cefseoc.org

C.E.F.S.

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?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____

State Agency _____

State Court _____

Local Agency _____

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

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Name of agency complaint is against:

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:

Liaison Jamie Brown
C.E.F.S. Economic Opportunity Corporation
1805 S. Banker Street PO Box 928
Effingham, IL 62401
217.342.2193

Appendix F

Public Participation Plan (PPP)

Public Participation

Mobility Manager(s) stay in contact with community organizations within our service area on a regular basis to stay informed of community needs. This contact is maintained in personal visits to area service agencies, monthly/quarterly Interagency Meetings in each service county, HSTP (Human Service Transportation Plan) Quarterly Meetings in Illinois Regions 7,8,9, and 10., and Chamber of Commerce Meetings. During these community contact opportunities our Mobility Manager(s) report on our services, provide resource materials regarding our program, and receive feedback from service providers on their clients needs/trends in public transportation needs. Our Mobility Manager(s) are also available upon request to provide presentation on our services to any social group or service agency requesting such presentations.

Central Illinois Public Transit holds bi-annual Community Forums in each service county. These meetings include our Program Compliance Oversight Monitors, service agency representatives, low income and disabled property managers, riders, and general public. Public attendees are strongly encouraged, and the meeting are promoted via our social media pages, Chamber of Commerce and Interagency email lists, and posted fliers throughout the community.

Annually, Central Illinois Public Transit conducts customer satisfaction surveys and reports the results to the C.E.F.S. Board of Directors and Program Compliance and Oversight Monitors. These surveys assess rider satisfaction with Central Illinois Public Transit services in areas such as affordability, reliability, ease of scheduling, and rider reported obstacles to fulfilling transportation needs. These surveys allow us to assess the demographics of our riders, trip purpose and areas in need of improvement.

Monthly reports are made to the C.E.F.S. Board of Directors, Shelby and Effingham Grantee Program Compliance and Oversight Monitors and the County Boards of our service area. These monthly reports include information on unduplicated riders, trip units, revenue and expenses, service denial reports, and service contracts.

Public Hearing

Central Illinois Public Transit holds an annual public hearing for public IDOT Grant Application reviews and input. Meetings are posted in local newspapers, our social media pages, and our website (www.cefseoc.org).

Appendix G

Language Assistance Plan (LAP)

Introduction

C.E.F.S. operates a transit system within Clay, Effingham Fayette, Shelby, Montgomery, Moultrie and Christian counties in Illinois. The Language Assistance Plan (LAP) has been prepared to address C.E.F.S.'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 C.E.F.S.'s service area 1.24% (+/- 0.77%) of the population describe themselves as not able to communicate in English "very well" (Source: US Census).

C.E.F.S. will be as inclusive as possible in delivery of service. C.E.F.S representatives in the small county where our German language concentration is found are in contact with the Amish community and they are aware of our services. We will continue to reach out and provide information to community members.

In Effingham County with the widest, yet very small population, of people who speak English less than very well, C.E.F.S. provides literacy services to anyone requesting assistance.

C.E.F.S. does not meet the threshold required to develop a Language Assistance Plan.

C.E.F.S. service area does not have LEP populations which qualify for the Safe Harbor Provision. [As shown in Appendix H, C.E.F.S. CIPT does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person.]

Appendix H

Operating Area Language Data: C.E.F.S. Service Area

Language	County	Percent of Populati
Total	Moultrie	1,4501
Speak only English		92.6
Spanish or Spanish Creole		.8
Speak English "very well"		.3
Speak English less than "very well"		.5
German		4.7
Speak English "very well"		3.5
Speak English less than "very well"		1.2
Other West German Languages		1.3
Speak English "very well"		1.1
Speak English less than "very well"		.2
Other Asian languages		
Speak English "very well"		
Speak English less than "very well"		
Other Pacific Island Language		.01
Speak English "very well"		.01
Speak English less than "very well"		0
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		

Language	County	Percent of Populati
Total	Effingham	Population 32,140
Speak only English		96.88
Spanish or Spanish Creole		1.63
Speak English "very well"		1.09
Speak English less than "very well"		.54
German		.376
Speak English "very well"		.364
Speak English less than "very well"		.08
Polish		.1
Speak English "very well"		.1
Speak English less than "very well"		0
Other Asian languages		
Speak English "very well"		
Speak English less than "very well"		
French		.29
Speak English "very well"		.29
Speak English less than "very well"		0
Urdu		.1
Speak English "very well"		.1
Speak English less than "very well"		0
Chinese		.07
Speak English "very well"		.07
Speak English less than "very well"		0
Japanese		.11
Speak English "very well"		.11
Speak English less than "very well"		0
Tagalog		.17
Speak English "very well"		.05
Speak English less than "very well"		.12
Arabic		.06
Speak English "very well"		.06
Speak English less than "very well"		0

<u>Language</u>	<u>County</u>	<u>Percent of Populati</u>
Total	Clay	Population 12,781
Speak only English		97.15
Spanish or Spanish Creole		2.20
Speak English "very well"		1.38
Speak English less than "very well"		.81
German		.24
Speak English "very well"		.24
Speak English less than "very well"		
Russian		.09
Speak English "very well"		.09
Speak English less than "very well"		0
Tagalong		.05
Speak English "very well"		.05
Speak English less than "very well"		
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		

Language	County	Percent of Populati
Total	Fayette	Population 20,934
Speak only English		96.40
Spanish or Spanish Creole		.91
Speak English "very well"		.72
Speak English less than "very well"		.19
German		1.26
Speak English "very well"		1.09
Speak English less than "very well"		.15
French		.19
Speak English "very well"		.07
Speak English less than "very well"		.12
Greek		.057
Speak English "very well"		.038
Speak English less than "very well"		.019
Polish		.043
Speak English "very well"		.043
Speak English less than "very well"		
Other West Germanic languages		.79
Speak English "very well"		.492
Speak English less than "very well"		.296
Other Indo European languages		.177
Speak English "very well"		.057
Speak English less than "very well"		.12
Korea		.067
Speak English "very well"		.067
Speak English less than "very well"		
Arabic		.076
Speak English "very well"		.076
Speak English less than "very well"		
Other and unspecified languages		.1
Speak English "very well"		.1
Speak English less than "very well"		

Language	County	Percent of Populati
Total	Christian	Population 32,298
Speak only English		98.31
Spanish or Spanish Creole		.92
Speak English "very well"		.728
Speak English less than "very well"		.192
German		.186
Speak English "very well"		.186
Speak English less than "very well"		0
French		.034
Speak English "very well"		0
Speak English less than "very well"		.034
Portuguse		.024
Speak English "very well"		.010
Speak English less than "very well"		
Other Pacific Island Languages		.118
Speak English "very well"		.1
Speak English less than "very well"		.108
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		
Greek		.081
Speak English "very well"		.081
Speak English less than "very well"		
Chinese		.037
Speak English "very well"		.037
Speak English less than "very well"		
Other West Germanic languages		.02
Speak English "very well"		0
Speak English less than "very well"		.02
Other Indo European languages		
Speak English "very well"		
Speak English less than "very well"		
Othe Asian Languages		.037
Speak English "very well"		0
Speak English less than "very well"		.037
Arabic		.08
Speak English "very well"		.03
Speak English less than "very well"		.05
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		

<u>Language</u>	<u>County</u>	<u>Percent of Populati</u>
Total	Shelby	Population 20,920
Speak only English		98.9
Spanish or Spanish Creole		.36
Speak English "very well"		.33
Speak English less than "very well"		.03
German		.11
Speak English "very well"		.05
Speak English less than "very well"		.06
French		.40
Speak English "very well"		.40
Speak English less than "very well"		
Other Slavic Languages		.13
Speak English "very well"		.065
Speak English less than "very well"		.065
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		

Language	County	Percent of Population
Total	Montgomery	Population 27,823
Speak only English		97.8
Spanish or Spanish Creole		1.0
Speak English "very well"		.815
Speak English less than "very well"		.195
German		.291
Speak English "very well"		.27
Speak English less than "very well"		.021
French		.11
Speak English less than "very well"		.11
Russian		.23
Speak English "very well"		.23
Speak English less than "very well"		0
Polish		.05
Speak English "very well"		.02
Speak English less than "very well"		.03
Hindi		.05
Speak English less than "very well"		.05
Urdu		.03
Speak English "very well"		.03
Speak English less than "very well"		
Chinese		.18
Speak English "very well"		.09
Speak English less than "very well"		.09
Japanese		.03
Speak English "very well"		.03
Speak English less than "very well"		
Tagalog		.12
Speak English "very well"		.08
Speak English less than "very well"		.04
Arabic		.04
Speak English "very well"		.04
Speak English less than "very well"		0

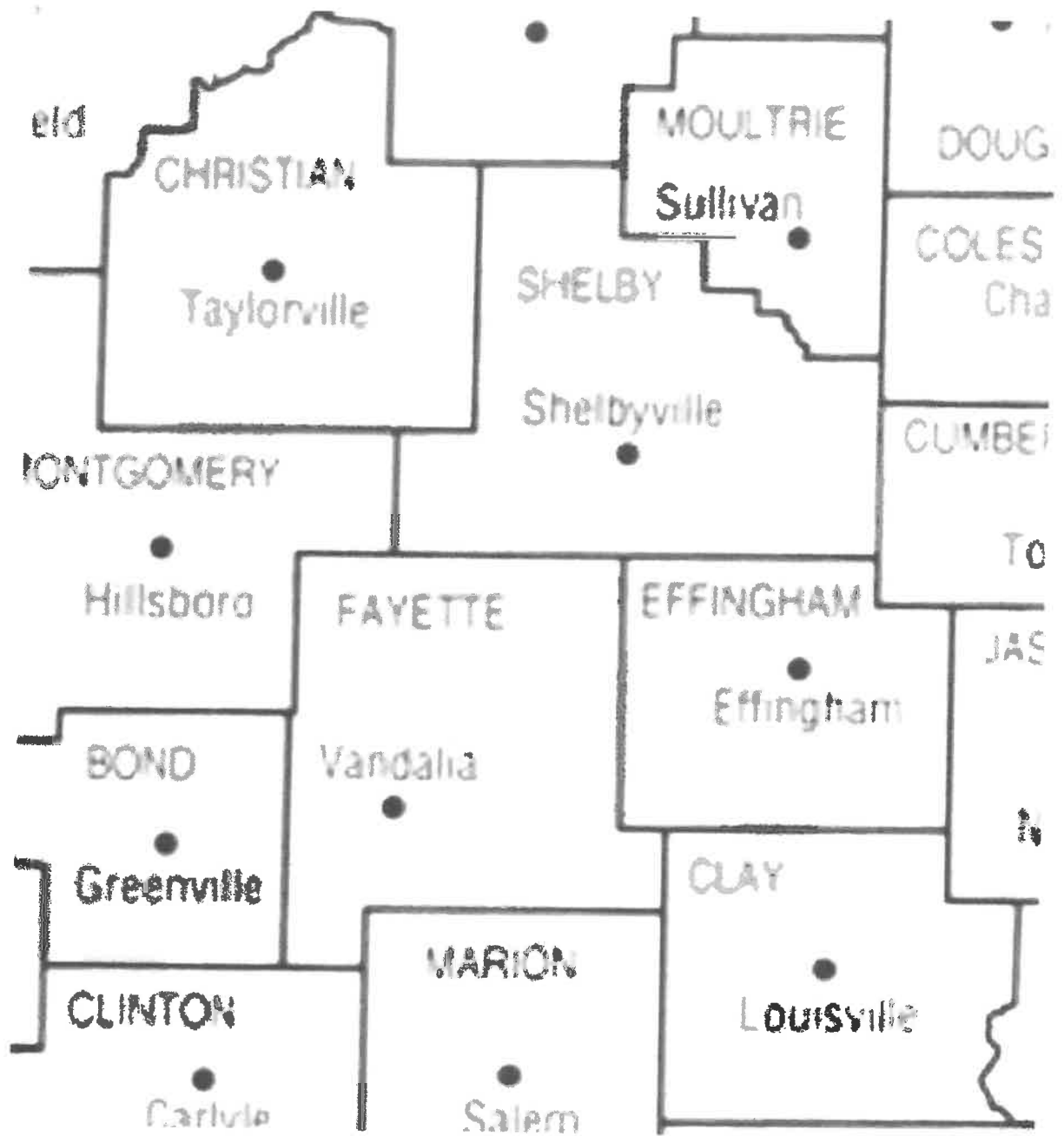
Appendix I

Demographic Charts

County	% Minority	% limited English Proficiency	% living below poverty
Clay	3.1	1.8	14.1
Effingham	2.7	1.2	9.3
Fayette	8.1	0.6	15.3
Shelby	2.3	0.1	10.3
Christian	5.0	0.4	12
Montgomery	5.7	0.4	13.2
Moultrie	2.8	4.2	9.6

*US Census data

(<https://data.census.gov/cedsci/profile>)



Appendix J

Title VI Equity Analysis

**CEFS has not purchased a facility recently nor has plans to
in the near future.**

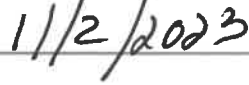
C.E.F.S. ECONOMIC OPPORTUNITY CORPORATION

TITLE VI TRANSPORTATION PLAN

SIGNATURE AUTHORIZATION PAGE



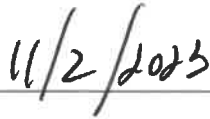
Chuck Buchanan
CEFS Board Chair



Date



Kevin Bushur
Chief Executive Officer



Date

Approved by the C.E.F.S. Economic Opportunity Corporation Board of Directors
on:

