

TITLE VI PROGRAM UPDATE

Of the
Decatur (IL) Public Transit System

- 2022 -

TITLE VI PROGRAM UPDATE

**DECATUR PUBLIC TRANSIT SYSTEM
CITY OF DECATUR, IL
2022**

Pursuant to the Title VI regulations issued by the U.S. Department of Justice (28 CFR 42, Subpart F) and the U.S. Department of Transportation (49 CFR Part 21), the City of Decatur, Illinois, as a recipient of Federal mass transit funding, hereby submits the following information:

CERTIFICATIONS AND ASSURANCES

Federal Fiscal Year 2022 Certifications and Assurances for Federal Transit Administration Assistance Programs.

COMPLAINT PROCEDURES

A copy of the Decatur Public Transit System's procedures for filing a Title VI complaint, and a copy of the DPTS "Title VI Discrimination Complaint Form".

INVESTIGATIONS, COMPLAINTS AND LAWSUITS

A list of Title VI investigations, complaints and lawsuits, if any, filed with the Decatur Public Transit System since the time of the last submittal.

NOTICE OF RIGHTS UNDER TITLE VI

A certification that the Decatur Public Transit System complies with Title VI and notice of procedures the public may follow to receive additional information and/or to file a discrimination complaint.

LIMITED ENGLISH PROFICIENCY (LEP)

An analysis of the number of LEP individuals in the area and a statement of measures being taken to ensure meaningful access by LEP persons.

PUBLIC PARTICIPATION

A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority persons had meaningful access to these activities.

CONSTRUCTION PROJECTS

A statement concerning whether any construction projects have been undertaken by the Decatur Public Transit System during the last three years, and whether any construction projects will be undertaken by the Decatur Public Transit System during the next three years.

FTA Title VI Program Chapter I: Introduction and Background

ENVIRONMENTAL JUSTICE. Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order 5610.2(a) (“Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) use to incorporate EJ principles into programs, policies, and activities.

The Presidential memorandum accompanying EO 12898 identified Title VI of the Civil Rights Act of 1964 as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.” According to the U.S. Department of Justice, “...the core tenet of environmental justice—that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minority—flows directly from the underlying principle of Title VI itself.”(See Title VI Legal Manual, U.S. Department of Justice Civil Rights Division (2001), page 59).

Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Under DOT’s Title VI regulations, recipients of Federal financial assistance are prohibited from, among other things, using “criteria or methods of administering its program which have the effect of subjecting individuals to discrimination based on their race, color, or national origin.” For example, facially neutral policies or practices that result in discriminatory effects or disparate impacts violate DOT’s Title VI regulations, unless the recipient can show the policies or practices are substantially justified and there is no less discriminatory alternative. In addition, Title VI and DOT regulations prohibit recipients from intentionally discriminating against people on the basis of race, color, and national origin.

The overlap between the statutory obligation placed on Federal agencies under Title VI to ensure nondiscrimination in federally assisted programs administered by State and local entities, and the administrative directive to Federal agencies under the Executive Order to address disproportionate adverse impacts of Federal activities on minority and low-income populations explain why Title VI and environmental justice are often paired. The clear objective of the Executive Order and Presidential memorandum is to ensure that Federal agencies promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice—fair distribution of the adverse impacts of, or burdens associated with, Federal programs, policies, and activities.

Over the years, U.S. DOT has encouraged a proactive approach to the implementation of

environmental justice principles in its programs, policies, and activities. This is reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)) which, consistent with E.O. 12898, sets forth a process by which DOT and its Operating Administrations, including FTA, will integrate the goals of environmental justice into their existing operations to ensure that consideration of EJ principles is an integral part of all programs, policies, and activities, from the inception of the planning process through to project completion, operations, and evaluation.

FTA has developed policy guidance in the form of a Circular (Circular 4703.1), “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” in order to provide recipients with a distinct framework to assist them as they integrate principles of environmental justice into their public transportation decision-making processes. FTA expects the clarification provided by the EJ Circular and the updated Title VI Circular will provide recipients with the guidance they need to properly incorporate both Title VI and environmental justice into their public transportation decision-making.

COMPLAINT PROCEDURES

This section describes how the Decatur Public Transit System (DPTS) will respond to complaints of discrimination under Title VI that are filed against DPTS or against any private firm (subcontractor) that provides transportation services to the public under an agreement with DPTS. DPTS will promptly investigate all complaints filed under Title VI in accordance with Department of Transportation (DOT) regulations at 49 CFR Section 21.11(b) and 21.11(c).

1. RIGHT TO FILE A COMPLAINT

Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by Title VI may by himself or by a representative file a written complaint with the DPTS. A copy of the two page "Title VI Discrimination Complaint Form" is attached at the end of this section. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by DPTS. Complaints must be submitted to:

Title VI Coordinator
Decatur Public Transit System
555 E. Wood Street
Decatur, Illinois 62523

2. INVESTIGATIONS

The Mass Transit Administrator is the designated Title VI Coordinator. DPTS will make a prompt investigation of any complaint of discrimination under Title VI. The investigation will include, where appropriate, a review of the pertinent practices and policies of DPTS and/or its subcontractor, the circumstances under which the possible discrimination occurred, and other factors relevant to a determination as to whether DPTS and/or its subcontractor have failed to comply with Title VI.

3. LETTERS OF FINDING AND RESOLUTION

After the investigation has been completed, the Mass Transit Administrator will prepare a written determination and transmit it to the complainant. Based on the findings of the investigation, the Mass Transit Administrator shall make one of the following determinations:

a. That DPTS and/or its subcontractor have failed to comply with Title VI, and that specific steps will be taken to ensure compliance with Title VI in the future. The written letter of finding shall include a thorough listing of the steps to be taken.

b. That DPTS and/or its subcontractor have complied with Title VI. The written letter of finding shall include a detailed explanation of this finding.

DPTS will attempt to complete a Title VI complaint investigation and resolve the complaint within 180 days of the date that the complaint is filed with DPTS. The written letter of finding shall provide notification of the complainant's right to appeal to the Federal Transit Administration (FTA).

4. APPEALS

All appeals must be submitted within 60 days of final determination. Appeals must be submitted to: City Manager's Office, City of Decatur Attn: City Manager's Office, One Gary K. Anderson Plaza, Decatur, IL 62523.

Title VI Discrimination Complaint Form continued

Have you already filed this complaint with any other federal, state or local agency, or with any federal or state court? Yes No

If "Yes", then please mark all that apply:

- Federal Agency State Agency Local Agency
 Federal Court State Court

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

Name: _____

Agency/Court: _____

Address: _____

City: _____ Zip: _____ Phone: _____

You must sign and date this form:

Signature

Date

Mail or hand deliver your completed form to: Title VI Coordinator, Decatur Public Transit System
555 E. Wood, Decatur, IL 62523

INVESTIGATIONS, COMPLAINTS AND LAWSUITS

There have been no complaints or lawsuits filed concerning violations of Title VI by the Decatur Public Transit System, and no investigations have been opened, since the time of the last submittal in June 2017. However, there have been three (3) complaints opened with our contractor, MV Corporation. The City continues to monitor these cases and will ensure they are handled according to FTA’s standards.

	Date (Month, Date, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s)Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.440-2019-04951	6/6/2019	Race	Dismissed	Investigated, Addressed and found by the EEOC that no statutes were violated
2. 2021SA0273	12/24/2020	Race, Age, and Sex	Dismissed	Investigated, Addressed and found by the EEOC that there was not sufficient evidence to move forward
3. 440-2021-01728	3/31/2021	Race, Sex, Age, Retaliation	Investigating	Currently investigating this case

NOTICE OF RIGHTS UNDER TITLE VI

Attached is a notice to the public that certifies that the Transit System complies with the requirements of Title VI of the Civil Rights Act of 1964. It informs the public of how to obtain additional information and how to file a complaint concerning a violation of Title VI. This notice is displayed in the lobby of the Transit Center and in the Lobby of the Administration Building. The notice is also placed on the Transit System's website. This notice is posted in all of the revenue vehicles periodically throughout the year.

NOTICE OF CIVIL RIGHTS UNDER TITLE VI

The Decatur Public Transit System (DPTS) hereby certifies that no person shall be denied the benefits of its services or discriminated against in any manner on the grounds of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964. DPTS will make every effort to ensure non-discrimination in all of its services and programs, whether those services and programs are federally funded or not.

If you would like additional information concerning the Transit System's obligations under Title VI, please contact Decatur Public Transit System:

By Mail: Decatur Public Transit System
555 E. Wood St.
Decatur, IL 62523

By Phone: (217) 424-2820

By Email: jwilliams@decaturil.gov

Any person who believe that they, or any specific class of persons, has been subjected to discrimination prohibited by Title VI by the Decatur Public Transit System may file a complaint with the DPTS Title VI coordinator. Complaints must be submitted in writing within 180 days of the date of the alleged act of discrimination. Please contact the Transit System to obtain a written copy of the procedures for filing a Title VI complaint and a copy of the complaint form.

John Williams
Mass Transit Administrator

LIMITED ENGLISH PROFICIENCY (LEP)

FTA Circular 4702.1B, Chapter I, defines persons with limited English proficiency as follows:

5. DEFINITIONS.

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

Decatur Residents with Limited English Proficiency (LEP)

The 2020 Census found that the City of Decatur had a decrease in population of 5.15% with a total of 67,593 residents 5 years of age and over and that only 2,441 (3.61%) Decatur residents, 5 years of age and over, speak a language other than English at home, a decrease from the 2000 Census. (See attached table "B06007").

Ability to Speak English:	Decatur Residents 5 Years of Age and Older	
	Number of Persons	Percentage
Speak English Very Well	1,056	1.56%
Speak English Less Than Very Well	260	0.38%

Out of that group, 1,056 Decatur residents reported in the 2020 Census that they spoke English "very well". Only 260 people, 0.38% of Decatur residents 5 years of age and over, reported to the U.S. Census that they do not speak English "very well" or do not speak English at all.

The 2000 Census showed that Decatur's population was 71,264 residents 5 years of age and older. That Census also showed that the number of Decatur residents, 5 years of age and over, who speak a language other than English at home was 2,773 (3.90% of Decatur residents 5 years of age and over). Report Attached: QT-P17.

Ability to Speak English:	Decatur Residents 5 Years of Age and Older	
	Number of Persons	Percentage
Speak English Very Well	1,942	2.53%
Speak English Less Than Very Well	831	1.09%

1,942 reported that they spoke English "very well", and 831 people, 1.09% of Decatur residents 5 years of age and older, reported that they speak English less than "very well".

LIMITED ENGLISH PROFICIENCY (LEP)

FTA Circular 4702.1B, Chapter I, defines persons with limited English proficiency as follows:

5. **DEFINITIONS.**

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

Decatur Residents with Limited English Proficiency (LEP)

The 2000 Census found that the City of Decatur had a total of 76,611 residents 5 years of age and over, and that only 2,773 (3.62%) Decatur residents, 5 years of age and over, speak a language other than English at home. (See attached table "QT-PI 7. Ability to Speak English: 2000".)

Ability to Speak English:	Decatur Residents 5 Years of Age and Older	
	Number of Persons	Percentage
Speak English Very Well	1,942	2.53%
Speak English Less Than Very Well	831	1.09%

Out of that group, 1,942 Decatur residents reported in the 2000 Census that they spoke English "very well". Only 831 people, 1.09% of Decatur residents 5 years of age and over, reported to the U.S. Census that they do not speak English "very well" or do not speak English at all.

The 2006-2010 American Community Survey (ACS), US Census estimates, showed that Decatur's population has decreased by 6.98% to 71,264 residents 5 years of age and older. That Census also showed that the number of Decatur residents, 5 years of age and over, who speak a language other than English at home had decreased by 20.88% since the 2000 Census, down to only 2,194 (3.08% of Decatur residents 5 years of age and over). (See attached table, "2006-2010 American Community Survey 5-Year Estimates".) Out of that group,

Ability to Speak English:	Decatur Residents 5 Years of Age and Older	
	Number of Persons	Percentage
Speak English Very Well	1,426	2.00%
Speak English Less Than Very Well	768	1.08%

1,426 reported that they spoke English "very well", and 768 people, 1.08% of Decatur residents 5 years of age and older, reported that they speak English less than "very well".

QT-P17. Ability to Speak English: 2020
Data Set: Census 2020 Summary File 3 (SF 3) - Sample Data
Geographic Area: Decatur City, Illinois

Label	Es ma e	Es ma e
Populatio2 52years2d over2	67,5932	(X)2
Speak2lyE2glish2	65,152	96.4%2
Speak2a2guage other2ha2		
E2glish2	,4412	3.6%2
SPEAK2A LANGUAGE2OTHER		
THAN2ENGLISH2		
Spa2ish2	1,3162	1.9%2
52to217 years2ld2	3312	0.5%2
18 to2642years old2	9282	1.4%2
65 years2ld a2d2ver2	572	0.1%2
Other2do-Europea2		
la2guages2	6132	0.9%2
52to217 years2ld2	152	0.0%2
18 to2642years old2	4682	0.7%2
65 years2ld a2d2ver2	1302	0.2%2
Asia2 a2d2Pacific Isla2d2		
la2guages2	3282	0.5%2
52to217 years2ld2	312	0.0%2
18 to2642years old2	362	0.3%2
65 years2ld a2d2ver2	612	0.1%2
Other2a2guages2	1842	0.3%2
52to217 years2ld2	452	0.1%2
18 to2642years old2	1392	0.2%2
65 years2ld a2d2ver2	02	0.0%2
CITIZENS2182YEARS2AND2OVER		
All2itize2s 182years2ld a2d2		
over2	56,2372	(X)2
Speak2lyE2glish2	54,8202	97.5%2
Speak2a2guage other2		
tha2 E2glish2	1,4172	.5%2
Spa2ish2	7482	1.3%2
Other2a2guages2	6692	1.2%2

QT-P17. Ability to Speak English: 2000
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data
Geographic Area: Decatur City, Illinois

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, definitions, and count corrections see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

Subject	Number	Percent
POPULATION 5 YEARS AND OVER BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH		
Population 5 years and over	76,611	100.0
Speak only English	73,838	96.4
Speak a language other than English	2,773	3.6
Spanish		
	1,425	100.0
Speak English "very well"	961	67.4
Speak English "well"	242	17.0
Speak English "not well"	182	12.8
Speak English "not at all"	40	2.8
Other Indo-European languages		
	978	100.0
Speak English "very well"	794	81.2
Speak English "well"	111	11.3
Speak English "not well"	67	6.9
Speak English "not at all"	6	0.6
Asian and Pacific Island languages		
	320	100.0
Speak English "very well"	152	47.5
Speak English "well"	112	35.0
Speak English "not well"	45	14.1
Speak English "not at all"	11	3.4
All other languages		
	50	100.0
Speak English "very well"	35	70.0
Speak English "well"	15	30.0
Speak English "not well"	0	0.0
Speak English "not at all"	0	0.0
ABILITY TO SPEAK ENGLISH		
Population 5 years and over	76,611	100.0
Speak a language other than English	2,773	3.6
5 to 17 years	577	0.8
18 to 64 years	1,870	2.4
65 years and over	326	0.4
Speak English less than "very well"	831	1.1
5 to 17 years	162	0.2
18 to 64 years	629	0.8
65 years and over	40	0.1
Speak English less than "well" (LEP)	351	0.5
ABILITY TO SPEAK ENGLISH IN HOUSEHOLD		
Linguistically isolated households *	157	(X)
Population 5 years and over in households		
	73,171	100.0
In linguistically isolated households *	298	0.4
5 to 17 years	43	0.1
18 to 64 years	234	0.3
65 years and over	21	0.0

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE
POPULATION 5 YEARS AND OVER

COMPARISON: 2000, 2010 AND 2013

CITY OF DECATUR, ILLINOIS

UNIVERSE: POPULATION 5 YEARS AND OVER

SOURCES: 2000 - U.S. CENSUS BUREAU, Census 2000 Summary File 3 (SF# - Sample Data 2010 - U.S.
CENSUS BUREAU, 2006-2010 American Community Survey
2013 - U.S. CENSUS BUREAU, 2009-2013 American Community Survey

Language Spoken at Home	2000	% of Total Population	2010	% of Total Population	2013	% of Total Population
Total Population 5 Years and Over	76,611	100.00%	71,264	100.00%	71,051	100.00%
Speak only English	73,838	96.38%	69,070	96.92%	68,633	96.60%
Spanish or Spanish Creole						
TOTAL	1,425	1.86%	1,092	1.53%	1,074	1.51%
Speak English 'Very Well'	961	1.25%	625	0.88%	738	1.04%
Speak English Less Than 'Very Well'	464	0.61%	467	0.66%	336	0.47%
Other Languages (Other Than English)						
TOTAL	1,348	1.76%	1,102	1.55%	1,344	1.89%
Speak English 'Very Well'	981	1.28%	801	1.12%	963	1.36%
Speak English Less Than 'Very Well'	367	0.48%	301	0.42%	381	0.54%
Total: All Languages Other Than English						
TOTAL	2,773	3.62%	2,194	3.08%	2,418	3.40%
Speak English 'Very Well'	1,942	2.53%	1,426	2.00%	1,701	2.39%
Speak English Less Than 'Very Well'	831	1.08%	768	1.08%	717	1.01%

It is not surprising that Spanish or Spanish Creole is the #1 non-English language spoken in Decatur homes. What is surprising is that the Census reported that 1,425 Decatur residents spoke Spanish at home in 2000, compared to only 1,074 in 2013. Therefore the number of people who speak Spanish at home in Decatur has decreased by 24.63% since 2000.

The 2009-2013 American Community Survey (ACS) shows that there are at least 26 languages, other than English, that are spoken in Decatur homes. The actual number of different languages spoken in Decatur homes is unknown. Since the ACS lists 18 specific languages plus the following 8 non-specific language categories:

- African languages;
- Scandinavian languages;
- Other Asian languages;
- Other Indic languages;
- Other Indo-European languages;
- Other Pacific Island languages;
- Other Slavic languages; and
- Other West Germanic languages.

There are 329 people included in these eight non-specific language categories.

Finally, the attached table details the ability to speak English for workers 16 and over by means of travel to their workplace. The Census estimate shows that 531 workers reported taking public transportation (excluding taxicabs) to work. Of those, only 43 workers reported speaking a language other than English at home, and all 43 reported that they speak Spanish at home. Twelve of the 43 Spanish speaking public transportation riders reported that they speak English "very well" and only 31 reported that they speak English less than "very well"

808113 MEANS OF TRANSPORTATION TO WORK BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH FOR WORKERS 16 YEARS AND OVER

CITY OF DECATUR, ILLINOIS

UNIVERSE: WORKERS 16 YEARS AND OVER, NOT WORKING AT HOME

SOURCE: U.S.CENSUS BUREAU
2009-2013 5-Year American Community Survey

Language Spoken at Home	Total Estimate	% of Total Population	Speak English "Very Well"	% of total Population	Speak English Less Than "Very Well"	% of Total Population
Total: Workers 16 Years and Over	30,395	100.00%	Not			
Working At Home						
Speak only English	29,029	95.51%				
Speak Spanish	515	1.69%	288	0.95%	227	0.75%
Speak Other Languages	851	2.80%	623	2.05%	228	0.75%
Car, Truck or Van - Drove Alone:	25,906	85.23%				
Speak only English	24,937	82.04%				
Speak Spanish	344	1.13%	212	0.70%	132	0.43%
Speak Other Languages	625	2.06%	490	1.61%	135	0.44%
Car, Truck or Van - Carpooled:	2,594	8.53%				
Speak only English	2,389	7.86%				
Speak Spanish	48	0.16%	19	0.06%	29	0.10%
Speak Other Languages	157	0.52%	78	0.26%	79	0.26%
Public Transportation (Excluding Taxicab):	531	1.75%				
Speak only English	488	1.61%				
Speak Spanish	43	0.14%	12	0.04%	31	0.10%
Speak Other Languages	0	0.00%	0	0.00%	0	0.00%
Walked:	863	2.84%				
Speak only English	740	2.43%				
Speak Spanish	54	0.18%	19	0.06%	35	0.12%
Speak Other Languages	69	0.23%	55	0.18%	14	0.05%
Taxicab, Motorcycle, Bicycle, or Other:	501	1.65%				
Speak only English	475	1.56%				
Speak Spanish	26	0.09%	26	0.09%	0	0.00%
Speak Other Languages	0	0.00%	0	0.00%	0	0.00%

Frequency of Contact with Riders with Limited English Proficiency (LEP)

The attached table summarizes the results of a DPTS employee survey conducted in May 2015. The purpose of the survey was to determine how often employees encountered riders with LEP, which languages those riders spoke, where those riders typically went to or came from, etc. All employees other than the mechanics and maintenance staff were surveyed. An analysis of the answers to the six questions follows.

Question #1: How often do you encounter riders who have difficulty with English or who don't speak English well?

The majority of the responses (59%) reported that employees encounter riders with LEP seldom or never; 12% said 1-2 per week or 2-3 per month; and 24% said "daily" or "often". Finally, one driver reported encountering riders with LEP 1-3 times per day, and another driver reported 3-4 times per day.

Question #2: Are the numbers of these riders increasing, decreasing, or staying about the same?

Out of the 39 responses to this question, most employees reported that the numbers were staying about the same (54%) and 5% of the employees felt that the numbers of riders with LEP were actually decreasing. Only 41% felt that the numbers were increasing.

Question #3: In the past 6 months how many different riders have, you encountered who have difficulty with English.

A large majority of the employees (72%) reported that they have encountered very few riders with LEP in the past 6 months: 15% of the employees reporting no contact, and 57% reporting meeting one to five riders with LEP. 28% of employees reported that they had encountered six or more riders with LEP in the past 6 months. Several drivers stated that they encountered 20 or more new riders with LEP, and one driver reported meeting new riders with LEP every day.

Question #4: Out of those riders, what language(s) do you think they spoke?

As expected, Spanish was the answer given most frequently, reported on 36 out of 37 responses. Many employees gave multiple responses. The other responses covered a wide range, including Chinese, Korean, French, Tagalog, and catchall responses such as Asian, African, Middle Eastern and India.

Question #5: Are there particular areas of Decatur those riders who have difficulty with English come from or go to most often?

The answer most frequently given by DPTS employees (40%) was that there are no particular areas of Decatur that riders with LEP typically come from or go to. The areas of the City mentioned by employees covers most of the City, but did not include the northwest quadrant or the southwest quadrant. These responses covered a range of locations around the City and did not indicate that a significant number of riders with LEP reside in or travel to any particular area of Decatur. Seven employees referred to specific shopping locations such as Wal-Mart, Kroger's and the Mall. In addition, two employees referred to "Mexican Restaurants" in general. These responses do not indicate that riders with LEP travel to or from stores and businesses that are any different from those that all riders travel to and from.

Question #6: Are there particular bus routes that riders who have difficulty with English take most often?

Listed, as possible answers are all of DPTS's bus routes plus "no particular routes - all routes." The answer most frequently given by the DPTS employees (45%) was that there are no particular bus routes that riders with LEP typically take. Note that many employees gave multiple responses, so that the responses included 44 references to specific bus routes. The four most frequently cited bus routes cover the north, northeast and east areas of the City. In general, the responses to this question covered a range of bus routes around the City. The answers to this question closely match the distribution of all bus riders on DPTS routes: i.e. low ridership on the Downtown Trolley and the Enterprise route; high ridership on the Water and St. Mary's routes. These responses do not indicate that riders with LEP use particular bus routes to travel to or from areas of Decatur that are any different from those that all riders travel to and from.

Question #7: Any additional comments?

Several employees commented on meeting riders who speak English but who have difficulty communicating, are hearing impaired or are visually impaired. One bus driver stated that he is studying German and Spanish to improve communications with riders. In addition, one employee suggested that the transit system provide basic Spanish classes for the employees, so that the employees can assist Spanish-speaking riders with LEP.

Summary:

- 59% of all DPTS employees reported that they encounter riders with LEP less than one time per week.
- Only 29% of the employees reported having daily or more frequent contact with riders with LEP.
- 41% of the employees reported that the numbers of riders with LEP are increasing while 59% reported that the numbers were staying about the same or were actually decreasing.
- 28% of employees reported that they had encountered six or more different riders with LEP in the past 6 months and 15% reported not contacts.
- As expected, Spanish was the language most often reported as spoken by riders with LEP. The other responses covered a wide range, including Chinese, Korean, French, Tagalog, and catchall responses such as Asian, African, Middle Eastern and India.
- 40% of the employees reported that there no particular areas of Decatur that riders with LEP typically come from or go to. The responses given by the other employees covered most of Decatur.
- Nine employees referred to specific shopping locations such as Wal-Mart, Kroger's and the Mall and to "Mexican Restaurants" in general. These responses do not indicate that riders with LEP reside in any particular area of Decatur, or travel to or from stores and businesses that are any different from those that all riders travel to and from.
- Riders with LEP do not appear to use particular bus routes to travel to or from areas of Decatur that are any different from those that all riders travel to and from. 45% of DPTS employees reported that there are no particular bus routes that riders with LEP typically take. The responses given by the other employees covered most of the DPTS bus routes.

The Importance of Public Transportation to Riders with Limited English Proficiency (LEP)

The Decatur Public Transit System (DPTS) provides public transportation using a fleet of buses and trolley-replica coaches on fixed routes, and it provides complementary door-to-door transportation for people with disabilities who are unable to use the fixed route system. DPTS does not provide special services such as school bus service, and it does not provide emergency or even non-emergency medical transportation. The importance of public transportation to riders with LEP is exactly the same as its importance to all other riders. It is a necessary means to get to and from work, to take care of personal business, to get to medical appointments, to go shopping, to go out for recreation, and to go to school. DPTS's 2014 Customer Satisfaction survey found those to be the top reasons (in order) that people gave for riding the buses, and these reasons appear to match the responses received in the employee survey concerning riders with LEP. For those with LEP the language barrier could delay or possibly even prevent them from using public transportation to take care of these and other daily activities.

While public transportation is important to everyone who uses it, none of DPTS's services is considered so crucial that the loss of DPTS's services would be life threatening. Note that DPTS's services are only provided Monday through Saturday, from 5:30 AM to 7:15 PM. There is no service at night (after 7:15 PM), no service on Sundays, and no service on six major holidays. Due to this schedule, some workers can go to work by bus but must have another means to get home when their shift ends, at 11:00 PM for example. Alternatively, they use public transportation most days but must have backup transportation on Sundays and holidays. If the lack of public transportation were considered to be life threatening, then the Transit System would operate 24 hours per day, 365 days per year. Again, note that DPTS does not provide emergency or even non-emergency medical transportation.

Important information from DPTS or about DPTS services that riders need to use the services of the transit system include:

- bus route maps and schedules;
- information on fares, passes, punch cards, etc.;
- information about how to ride buses;
- information about door-to-door transportation for people with disabilities, and how to apply for that service;
- public service announcements, such as temporary snow routes and schedule changes;
- information on passenger rights and how to file a complaint; and
- Safety and security information.

The results of a DPTS employee survey conducted in May 2015 indicate the relative importance of public transportation to riders with limited English proficiency (LEP). The purpose of the survey was to determine how often employees encountered riders with LEP, which languages those riders spoke, where those riders typically went to or came from, etc. All employees other than the mechanics and maintenance staff were surveyed. Questions #5 and #6 asked if there were particular areas of Decatur that riders with LEP typically come from or go to, and if there are particular bus routes that riders with LEP typically use.

Question #5: Are there particular areas of Decatur that riders who have difficulty with English come from or go to most often?

The answer most frequently given by DPTS employees (40%) was that there are no particular areas of Decatur that riders with LEP typically come from or go to. The areas of the City mentioned by employees covers most of the City, but did not include the northwest quadrant or the southwest quadrant. These responses covered a range of locations around the City and did not indicate that a significant number of riders with LEP reside in or travel to any particular area of Decatur. Seven employees referred to specific shopping locations such as Wal-Mart, Kroger's and the Mall. And two employees referred to "Mexican Restaurants" in general. These responses do not indicate that riders with LEP travel to or from stores and businesses that are any different from those that all riders travel to and from.

Question #6: Are there particular bus routes that riders who have difficulty with English take most often?

Listed, as possible answers are all of DPTS's bus routes plus "no particular routes - all routes." The answer most frequently given by the DPTS employees (45%) was that there are no particular bus routes that riders with LEP typically take. Note that many employees gave multiple responses, so that the responses included 44 references to specific bus routes. The four most frequently cited bus routes cover the north, northeast and east areas of the City. In general, the responses to this question covered a range of bus routes around the City. The answers to this question closely match the distribution of all bus riders on DPTS routes: i.e. low ridership on the Downtown Trolley and the Enterprise route; high ridership on the Water and St. Mary's routes. These responses do not indicate that riders with LEP use particular bus routes to travel to or from areas of Decatur that are any different from those that all riders travel to and from.

The responses to Questions #5 and #6 show that riders with LEP reside in areas all around the City, and that they use the bus system to get to and from places all around the City, just like the other bus riders. Their typical destinations are the Mall, grocery stores, department stores, places of employment, etc., also just like the other bus riders. And note that 59% of the employees responding to the 2015 employee survey reported that they encounter riders with LEP seldom or never. There is nothing to indicate that riders with LEP rely on public transportation in Decatur any more or any less than the other bus riders.

Unlike many larger cities, Decatur does not have established ethnic areas. There are no places where one would find clusters of ethnic restaurants or grocers. There are no foreign language newspapers printed in Decatur, and there are no local foreign language radio or television stations or programming. There are no local churches holding special services for those who do not speak English. The current US Census estimates do not show that there is a significant and/or growing LEP population in the City. The residents of Decatur who speak a language other than English at home are well diversified throughout the Decatur area and well integrated into the community.

Available Resources

The Decatur Public Transit System has identified the following language assistance resources:

- Written and verbal translation assets have been identified in Decatur at the Community Health Improvement Center, at Millikin University, and at Richland Community College. Unfortunately, these translation assets are available for only a limited number of languages. Verbal translation assistance may be available at no cost; the charge for written translation services depends on the language and the amount of text to be translated.
- A file listing DPTS employees who can communicate in a language other than English has been established and is periodically updated.
- Verbal translation assistance is available at no cost in "emergency" situations from the Decatur Police Department.
- Several national firms have been identified that offer telephone translation services, with or without contract. DPTS does not have a contract with a telephone translation service at this time. Typical contract costs for the service require a monthly fee (e.g. \$50 per month) plus a per minute charge for service over a set number of minutes. Typical non--contract costs for the service range from \$1.50 to \$2.50 per minute. The cost may vary by the language to be translated, and by the number of minutes of service used. The vendors may require a set-up charge.
- On-line computer websites which provide free translation services have also been identified. Such sites will either 1) translate English text to a language the user identifies, or 2) translate text from a language the user identifies into English, or 3) detect the language of a text entry and automatically translate it into English.
- The Transit System's Safety and Training Officer has found sensitivity training materials relating to interacting with LEP riders. These cover the correct way to respond to LEP riders, ways to communicate necessary information to LEP riders, and ways to identify the language that the LEP rider speaks. The cost for these training materials varies.
- All permanent informational signs posted inside the buses purchased since 2009 are printed in both English and Spanish: e.g. "Pull to Signal", "Emergency Exit", "Wheel Chair Seating Area", etc. The charge for the bilingual signs is the same as for the English only signs.

In February 2011, DPTS began printing and distributing a Spanish version of the complete Route Map and Schedules. A photocopy of the cover of the latest issues, Spanish and English, is attached. DPTS spent \$637 in 2011 on translating and setting up the Spanish language route map and schedule for printing, plus \$1,560 to print 500 copies of the February 2011, Spanish version. The cost of setting up and printing 500 copies of the September 2011, Spanish language route map and schedule was \$745. Going forward the cost of setting up and printing Spanish language route maps and schedules is expected to be about \$1,400 per year. Since 2011, the cost of the Spanish language route map and schedule has not been separated out.

Because the majority of Decatur residents with LEP speak Spanish, DPTS finds that it should focus its language resources on improving access for persons who speak Spanish. The following printed materials should be translated into Spanish when funding permits:

- all information posted in the Transit Center, the Administration Building and vehicles (e.g. information on passenger rights and how to file a complaint);
- all information on the DPTS website;
- public service announcements (e.g. temporary bus routes and schedule changes);
- Information about door-to-door transportation for people with disabilities and how to apply for that service -- the "Operation Uplift" brochure and eligibility application form.

On-demand translations services by phone could be implemented to assist LEP persons who call the customer service call center, dispatch center, or administrative offices.

Finally, sensitivity training materials relating to interacting with LEP riders should be included in the training of bus drivers, ADA van drivers, bus and ADA van dispatchers, street supervisors, and administrative staff.

Due to the small size of the Transit System, its limited staff and limited budget, only low cost and no cost measures to provide language services can be considered at this time. Excess funds are not available in the budget, and there are no Federal or State grants available to pay for new programs and services for riders with LEP. Dedicating a large amount of funds to language services would necessarily require reducing operating costs in another area, by reducing some other services. Further complicating the situation is the uncertainty of future Federal, State and local funding: Decatur's Section 5307 apportionment is not guaranteed in the future; the Governor's current budget proposes significant operating assistance reductions for all transit systems to help the State balance the budget; and the City of Decatur has been forced to eliminate funding for the Transit System due to its own fiscal situation.

Cost effective measures for providing language services to riders with LEP that DPTS should implement, in addition to what has already been accomplished, are:

- DPTS should seek a low cost contract with a vendor that provides on-demand telephone translation services.
- DPTS staff should explore ways that the verbal translation assistance available from the Decatur Police Department could be integrated into DPTS's phone system.
- DPTS staff should research and pursue language assistance products and translation services developed and paid for by Federal and State agencies and grants.
- DPTS staff should continue to translate all of its printed materials into Spanish.

- DPTS staff should seek opportunities to collaborate with local organizations to provide educational opportunities to help instruct DPTS employees in interacting with LEP persons.
- DPTS should seek opportunities with local educational systems (e.g. Richland Community College) to provide basic language instruction in Spanish and other languages for its employees.

Summary and DPTS Services to Provide Meaningful Access by LEP Persons

The 2000 through 2013 Censuses show that the number of LEP persons in Decatur is very small and it is decreasing. The number of Decatur residents 5 years of age and older has decreased by 7.26% since 2000 to 71,051. Of those, the number who speak a language other than English at home has decreased by 12.80% since 2000, down to only 2,418 (3.40% of Decatur residents 5 years of age and over). The 2000 Census identified that there were 831 LEP people in Decatur, or about 1.09% of residents 5 years of age and over. The 2013 Census estimate identifies that the number of people with LEP has dropped to 717, or about 1.01% of Decatur residents 5 years of age and over.

It is not surprising that Spanish or Spanish Creole is the #1 non-English language spoken in Decatur homes: What is surprising is that the Census reported that 1,425 Decatur residents spoke Spanish at home in 2000, compared to only 1,074 in 2013. Therefore, the number of Decatur residents who speak Spanish at home has decreased by 24.63% since 2000. In addition to English and Spanish, there are at least 25 other languages spoken in Decatur homes. In 2010, the Census estimated that about 60% of Decatur residents with LEP spoke Spanish and the other 40% spoke at least 21 different languages. Now in 2013 the Census estimates that 46.86% of Decatur residents with LEP speak Spanish and the other 53.14% speak at least 25 different languages.

The frequency of DPTS employee contact with riders with LEP reflects the low number of Decatur residents with LEP. Most DPTS employees (59%) reported that they encounter riders with LEP less than one time per week. 72% of DPTS employees reported that they have encountered very few riders with LEP in the past 6 months; 15% reported no contacts with riders with LEP in the past 6 months. Only 41% of all DPTS employees reported that the number of riders with LEP is increasing. Most employees reported that the number was staying about the same, and 5% felt that the number of riders with LEP was actually decreasing.

The importance of public transportation to riders with LEP is the same as its importance to all other riders: it is a necessary means to get to and from work, to take care of personal business, to get to medical appointments, to go shopping, to go out for recreation, to go to school, etc. DPTS's 2014 Customer Satisfaction survey found those to be the top reasons (in order) that people gave for riding the buses, and these reasons appear to match the responses received in the employee survey concerning riders with LEP. For those with LEP, the language barrier could delay or possibly even prevent them from using public transportation to take care of these and other daily activities.

While public transportation is important to everyone who uses it, none of DPTS's services are considered to be so crucial that the loss of DPTS's services would be life threatening. Note that DPTS does not provide emergency or even non-emergency medical transportation. In addition, note that DPTS's services are only provided Monday through Saturday, from 5:30 AM to 7:15 PM. There is no service at night (after 7:15 PM), no service on Sundays, and no service on 6 major holidays. Due to the daily hours of operation, some workers can go to work by bus but must have another means to get home when their shift ends, at 11:00 PM for example. Or they can use public transportation most days but must have backup transportation on Sundays and holidays. If the lack of public transportation were considered to be life-threatening, then DPTS would be required to operate 24 hours per day, 365 days

per year. Also, note that that DPTS does not provide emergency or even non-emergency medical transportation.

Although it has elected not to prepare a written language implementation plan, the Decatur Public Transit System is committed to ensuring meaningful access by LEP persons to the transit system's services and programs. Following are some of the DPTS services that have already been implemented to improve access by LEP persons.

- All transit employees are directed to record and report information on LEP riders they encounter. Of key importance are the primary language spoken by the LEP rider, the number of LEP riders, the number or trips taken by LEP riders, and their origins and destinations. This information will be useful in assessing the need for signs, brochures, maps and schedules, and verbal communication in languages other than English.
- The annual DPTS Customer Satisfaction survey includes questions on the rider's ability to speak English and the language spoken at home, in addition to the usual questions on trip purpose, frequency, etc.
- Written and verbal translation assets have been identified in Decatur at the Community Health Improvement Center, at Millikin University, and at Richland Community College. Unfortunately, these translation assets are available only for Spanish and a limited number of other languages.
- A file listing DPTS employees who can communicate in a language other than English has been established and is periodically updated.
- Verbal translation assistance is available at no cost in "emergency" situations from the Decatur Police Department.
- Several national firms have been identified that offer telephone interpretation services, with or without contract. DPTS does not have a contract with a telephone interpretation service at this time.
- On-line computer websites that provide free translation services for written text have also been identified.
- The Transit System's Safety and Training Officer is seeking sensitivity training materials relating to interacting with LEP riders. These would cover the correct way to respond to LEP riders, ways to communicate necessary information to LEP riders, ways to identify the language that the LEP rider speaks, etc.
- Permanent informational signs inside all buses purchased since 2009 are printed in both English and Spanish: e.g. "Pull to Signal", "Emergency Exit", "Wheel Chair Seating

Area", etc.

- While non-English notices are not posted at these time, brief messages in Spanish are included in most Transit System posters, brochures, etc., advising that a Spanish version of the item is available upon request. Following is a sample notice that appears in the English version of Decatur's Route Map and Schedules:

Version en Espanol
Como un servicio a nuestros clientes, le proveeremos una copia de este "Route Map & Schedule" en español si usted así lo solicita. Para obtener dicha copia, puede escribirnos al
Decatur Public Transit System
555 E. Wood Street
Decatur, IL 62523
o llamarnos al (217) 424-2814, y solicitar una versión en español.

- Since February 2011, all DPTS Route Map & Schedules are printed and distributed in English and Spanish. A photocopy of the cover of the latest issues (Spanish and English) is attached.

Due to the small size of the Transit System, its limited staff and limited budget, only low cost and no cost measures to provide language services can be considered at this time. The current Census estimates show that there is not a significant and/or growing LEP population in the City of Decatur that would warrant the development of a language implementation plan. Since about 47% of Decatur residents with LEP speak Spanish and the other 53% speak at least 25 different languages, DPTS intends to focus its language resources on improving access for persons who speak Spanish. DPTS intends to continue to work toward implementation of the following measures to provide meaningful access by LEP persons:

- Translate all of DPTS's printed materials into Spanish, including information posted in the buildings and vehicles; information on the DPTS website; public service announcements; and the "Operation Uplift" brochure and eligibility application form.
- Contract with or set up an account with a vendor that provides on-demand telephone interpreter services.
- Explore ways that the verbal translation assistance available from the Decatur Police Department could be integrated into DPTS's phone system.
- Research and pursue any language assistance products and translation services developed and paid for by Federal, State or local government agencies.
- Seek opportunities to collaborate with local organizations to provide educational opportunities to help instruct DPTS employees in interacting with LEP persons.
- Expand employee training, primarily for bus drivers and dispatchers, to include issues related to LEP persons.

- Seek opportunities to provide basic language instruction in Spanish for its employees.

PUBLIC PARTICIPATION

The Decatur Public Transit System seeks to ensure that all segments of the public are involved in every decision made. To achieve that end, public notices and public hearings are routinely used to inform the public of key issues and to solicit comments and questions. The FTA requires that grantees publish a notice announcing the opportunity, if requested, for a public hearing on all proposed grants. The Decatur Public Transit System goes a step further and always publishes a notice scheduling public hearings on every grant application.

Examples of the efforts made toward public participation are best demonstrated in the two major studies undertaken by the Transit System in recent years. One study involved a proposal to eliminate one of the two trolley routes, with potential impact on the downtown area. During the 6-month study, surveys were done in person on-board the buses and trolleys, on-street surveys were taken in the downtown area, employee questionnaires were sent to major downtown employers, and questionnaires were mailed to over 3,000 area residences selected at random. These efforts were in addition to the hearings that were held and the public notices that were placed in the local newspaper and posted in the Transit System's buildings, buses and trolleys.

The other major study was the realignment of four bus routes and their schedules in the southwest quadrant of the City, to accommodate the relocation of the City's largest public aid office. Decatur Township announced that *it* was moving its main office, which was served by several bus routes and had 30 minute bus service, to a semi-rural location served by only one bus route that provided 2 hour service. Staff used public hearings and notices placed in local newspapers, including the local minority paper and the Millikin University newspaper, buildings, bus shelters, trolleys and buses, and the internet to develop consensus on the best solution.

Since then the Transit System has started using two other means to keep the public informed and involved. First, notices and information are now being posted on the City's internet website. In the past, this website was used merely to display basic information about the Transit System and its routes and schedules, and the website was updated annually. Staff now uses the Transit System's web pages as another place to post timely notices, to request input, to advertise Invitations for Bids, etc. Second, the Transit System is using the City's public access channel, Cable Channel 18. Information such as service interruptions during winter storms and how to qualify for free bus rides under the State's "Circuit Breaker" program have been broadcast on Cable Channel 18. The Transit System is able to make text presentations of important service changes on channel 18 that can be viewed instantly by almost everyone (limited to those who subscribe to the local Cable TV provider), instead of just making presentations at sparsely attended, untimely public hearings. Both of the major studies discussed above would have benefited from these improvements.

Starting in 2009 the Transit System began taking annual surveys of its fixed route bus passengers to learn more about the demographics of its passengers, how and why they use the Transit System, how satisfied they are with the service, and what changes they would like to have made to the system. Between 700 and 800 completed surveys are collected in three days each summer by our survey crews. The tabulated results of the written surveys are printed and presented to the City Council members, and posted on the City's website for public review. The final report compares

the results of the current survey with the results from the previous surveys, to demonstrate changes over time.

As stated in the "Limited English Proficiency (LEP)" section, Decatur does not have established ethnic areas. There are no places where one would find ethnic restaurants or grocers. There are no foreign language newspapers published in the Decatur area. There are no local radio stations or television stations geared toward an ethnic group, or even ethnic programs on local radio and television stations. There are no churches holding special services in languages other than English. The residents of the City of Decatur who speak a language other than English at home are well diversified throughout the Decatur area. The Transit System had made it a normal practice to place notices in the "Torch" newspaper printed and distributed in Decatur, to ensure that the African-American community is informed and able to participate in all Transit System decisions.

CONSTRUCTION PROJECTS

The following construction projects were undertaken by the Decatur Public Transit during the last three years:

Project	Dates	Resolution No.
Bus Shelter Concrete Pads	7/2018-10/2018	City Project 2018-17 R2018-87
Bus Shelter Concrete Pads	9/2019-8/2024	City Project 2019-17 R2020-46

CITY OF DECATUR ADMINISTRATIVE POLICY & PROCEDURE MANUAL



Subject: Transit Title IV Policy	Number C - 802
Effective Date February 23, 2022	Revision 0
	Page 1 of 1

1.0 POLICY STATEMENT

This policy defines the procedures for the Title VI policy as required by the Federal Transit Administration for the United States Federal Grant Reports.

2.0 PROCEDURES:

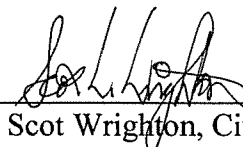
Preparation of the Title VI and ADA guideline policies for public transit is the responsibility of the Transit Administrator or designee. Upon completion of the policies and before city sign off approval and filing of the policies with the state or federal governmental units, the policies will be provided to the City legal staff and Deputy City Manager for review. Upon completion of the review of the policies, the Transit Administrator or designee will be notified of clearance to proceed with City sign-off approval and the submission and filing of the policies with the appropriate state and federal governmental units. Upon completion of filing and approval of the policies with the federal or state governmental agencies, the Transit Administrator will have these documents published on the City website and disseminate copies to the public.

3.0 COMPLIANCE WITH LAWS

This Policy may be modified from time to time to reflect changes to gubernatorial orders, state laws, and other regulations or guidance. Federal and State guidelines governing expenditures of grant awards requires periodic updates to the civil rights documents such as: Title VI and ADA guidelines, policies, and procedures. Federal and State guidelines governing expenditures of grant awards requires periodic updates to the civil rights documents such as: Title VI and ADA guidelines, policies, and procedures.

4.0 EMPLOYEE RESPONSIBILITY

Failure to follow the directives outlined in this policy shall result in disciplinary action, including but not limited to suspension and/or termination.



Scot Wrighton, City Manager