



# Title VI Program July 2020

## Table of Contents

Introduction	2
GENERAL REQUIREMENTS	3
1. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES & PLAN	3
2. TITLE VI NOTICE TO THE PUBLIC	3
3. HOW TO FILE A GRIEVANCE, COMPLAINT & APPEAL PROCESS	3
4. PUBLIC PARTICIPATION	5
7. LANGUAGE ASSISTANCE PLAN FOR LEP PERSONS	6
EXHIBIT A – TITLE VI NOTICE	
EXHIBIT B – TITLE VI COMPLAINT	

## Introduction

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance. DuPage County is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its activities or services on the basis of race, color, or national origin.

Pursuant to instructions, given to DuPage County by the Regional Transportation Authority, this Title VI Program of DuPage County has been developed pursuant to FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (the "Circular").

## General Requirements

### **1. Requirement to Provide Title VI Assurances and Title VI plan:**

DuPage County will provide the RTA with our Title VI plan and or assurances annually or when requested. DuPage County has no subrecipients for this funding and does not provide funding for a facility or the maintenance of a facility.

### **2. Title VI Notice to the Public:**

In accordance with 49 C.F.R. Section 21.9, DuPage County provides public notice of this program by way and in the form of the document attached as **Exhibit A**. This notice is provided on the Ride DuPage website at <http://www.ridedupage.org> and posted at the DuPage County Community Services office on its public bulletin board.

### **3. How to file a Grievance, Complaint Process and Appeal (Exhibit B)**

**A. Purpose:** To allow a recipient of services an opportunity to voice his or her dissatisfaction with services in direct relation to Title VI of the Civil Rights Act of 1964 services.

#### **B. Grievance Process:**

Direct Service is provided by a paid or auxiliary staff member in the following positions:

- i. Project Administrators: PACE
- ii. Community Services Director: Mary A. Keating, DuPage County Department of Community Services

- iii. Administrator of Intake and Referral: Gina Strafford-Ahmed, DuPage County Community Services
- iv. PACE Quality Control/Compliance Manager
- v. PACE ADA Division Manager

The above staff provide patrons an opportunity to voice dissatisfaction with service and a patron may begin a Title VI grievance at any time. Grievance intake is received without judgment and if no satisfaction can be given the patron, they are directed to speak to the PACE ADA Division Manager. If the client remains unsatisfied, they will be referred to the Illinois Department of Human Rights and the Federal Department of Justice.

After a complaint is received, the staff person in charge of the service contacts the patron to discuss the issue within seven days of receipt. If the client is still dissatisfied, the PACE Quality Control/Compliance Manager will call and discuss the issue with the patron.

If satisfaction cannot be reached, the PACE Quality Control/Compliance Manager invites the patron to address the issue with the PACE ADA Division Manager.

Patrons can voice a grievance without discrimination or reprisal. If a staff person reacts inappropriately to a complaint, the PACE Quality Control/Compliance Manager will address the issue through some form of disciplinary action ranging from a management note to written warning up to and including termination based on the incident. Customer Service training is ongoing, and the DuPage County and PACE core value of respect is taken very seriously. If a staff person acts inappropriately, they may be dismissed.

### **C. Complaint Process**

- i. Once a complaint is lodged, we are duty-bound to investigate it with staff and persons involved within 10 working days. If the complaint is a result of an “incident”, an Incident Report is to be completed and signed by the staff member involved. A copy of the Incident Report is given to the PACE Staff Project Administrator and the PACE Quality Control/Compliance Manager. A complaint must be received within 180 days of the incident.
- ii. The patron must first discuss his or her grievance with the staff person to resolve the problem. If after the discussion with the persons involved that no resolution can be reached, the PACE Quality Control/Compliance Manager contacts the patron to discuss the issue.
- iii. The PACE Quality Control/Compliance Manager will investigate all sides of the grievance the patron will be notified in writing of a decision and the supporting reasons within 10 working days of notification of the grievance.

### **D. Appeal Process**

- i. If the patron is not satisfied with PACE resolution to the complaint, they will be referred to their respective sponsor. The patron can appeal in writing to the

Administrator of Intake and Referral within five (5) working days of receipt of notification from the PACE Quality Control/Compliance Manager of his/her decision. The Administrator of Intake and Referral will investigate all sides of the grievance and will notify the patron in writing of his or her decision and supporting reasons within ten (10) working days from the appeal request.

ii. If a patron feels uncomfortable discussing the grievance with the Administrator of Intake and Referral, they may immediately bring the grievance to the attention of the DuPage County Director of Community Services. DuPage County will decide within 10 working days of the receipt of the appeal. Note due to the nature of the program such an appeal may need to be forwarded to PACE for disposition. PACE is responsible for the Ride DuPage call center and the transportation itself.

**E. Listing of all Title VI Investigations, Complaints, or Lawsuits: None**

**4. Public Involvement:**

A. PACE Citizens Advisory Board has been established to fulfill its commitment to maintaining relationships with the riding public and the communities it serves, Pace has established a Citizens Advisory Board (CAB), which convenes quarter to advise staff and the Pace Board on the effects Pace policies have upon the communities. The CAB is comprised of individuals from throughout the six-county metropolitan region.

CAB meetings are open to the public and notice of the meeting dates, agendas and minutes are posted online: <https://www.pacebus.com/citizens-advisory-board>

CAB meetings are held from 10:00 a.m. to 12:00 p.m. at PACE Headquarters, Conference Room 132, 550 W. Algonquin Road, Arlington Heights, Illinois, 60005. The building is accessible to persons with disabilities and transportation is available via Ride DuPage or PACE to the meetings if necessary.

CAB members represent a number of constituencies and areas of expertise, have distinguished track records of public service in numerous capacities and are deeply committed to excellence in public transit.

The Citizens Advisory Board regularly reports to the Pace Board to "advise the [Pace] Suburban Bus Board of the impact of its policies and programs on the communities [Pace] serves". In addition, CAB members make suggestions directly to Board members and Pace staff regarding improvements to the current system.

Members of the CAB are appointed by the Pace Board of Directors and serve two-year terms. The Citizens Advisory Board is another example of how Pace and the communities it serves form beneficial partnerships to solidify Pace's status as the premiere suburban public transportation service.

B. PACE Suburban ADA Advisory Committee purpose is to advise PACE staff on issues affecting people with disabilities. The committee has 15 members that meet bi-monthly at PACE Headquarters, 550 W. Algonquin Road, Arlington Heights, IL 60005. They are open to the public and held from 1:00 pm to 3:00 pm. Agendas and meeting dates are posted online: <https://www.pacebus.com/ada-advisory-committees>

Group	Caucasian	Latino	African American	Asian American	Other
<b>Suburban ADA Advisory Committee</b>	92%	0%	8%	0%	0%
<b>Citizens Advisory Board</b>	66%	0%	22%	11%	0%

C. DuPage County offers public input on the annual budget process via consumer feedback surveys posted on the County's webpage: [www.dupageco.org](http://www.dupageco.org). DuPage County also allows for public comment at all County Board meetings and committee meetings for those wanting to provide input.

DuPage County Ride DuPage Program does not have a specific public participation plan due to the fact it is a Sponsor based program. Ride DuPage is a transportation service that operates 7 days per week, 24-hours a day. Organizations such as municipalities, townships, social service organizations, and employers can participate by subsidizing transportation for their clients or constituents.

Eleven sponsoring agencies determine the eligibility for their riders. For example, a municipality may wish to establish eligibility based on age or disability, while a social service organization may establish eligibility based on income.

Each Sponsor is responsible to engage their riders. DuPage County's eligibility is for low income, disabled and or senior citizens 60+ to use the service. It is extremely limited in scope due to the high cost of the PACE call center as well as the taxi and bus fees.

Information on Ride DuPage can also be found at [www.ridedupage.org](http://www.ridedupage.org).

##### **5. LEP (Limited English Proficient) Program.**

DuPage County's Provision of Services to Persons who are Limited-English Speaking. The LEP Policy was implemented in October 2005.

## **LEP Policy**

It is the policy of DuPage County Community Services to ensure that all services and programs offered by DuPage Community Services are accessible to individuals who are limited-English-proficient. Title VI of the Civil rights Act of 1964 requires that all persons who are non-English or limited-English-speaking have the same access to services as all other persons. It is the obligation of the County to offer qualified interpreters in other languages to all clients who are non-English-speaking or limited-English-speaking. The County's obligation to provide such language interpreters is not dependent on the clients request for same.

## **Definitions**

Person who is limited-English-proficient – A person whose primary language or dialect is a language other than English, and who has difficulty speaking and/or comprehending the English language.

Qualified translator – A person fluent in English and in the necessary language of the client who can accurately speak, read, and readily interpret the necessary second language for clients who are limited-English-proficient. Interpreters shall have the ability to translate and describe completely the client's needs in both languages.

Language or communication barrier – With respect to spoken language, barriers that are experienced by limited-English-speaking or non-English-speaking individuals who speak the same primary language.

## **Procedures**

Staff will determine with the client if interpretation is needed by any of the below examples:

1. Client or client's family/friend requests an interpreter.
2. Staff's inability to effectively communicate in client's language.

Staff may use Tele-Interpreters or Optimal Phone Interpreters to determine the language a client speaks, or the client may use the sign located in the Community Services waiting area to indicate the language interpretation needed to effectively communicate. Staff will then review the internal interpreter/translator list and determine if someone can assist. If no one is available or no one meets the language criteria Tele-Interpreters will be used. If Tele-Interpreters is used staff will inform their immediate supervisor so they are aware when the billing arrives.

When a language or communication barrier exists, the County will arrange for a qualified translator to be present in all situations where effective communication is necessary. These situations shall include, but not be limited to, the following:

Intake process  
Application process

## Obtaining informed consent

Explaining procedures, policies, document request forms, etc.

Relatives or friends of the limited-English-speaking client shall not be used as interpreters unless, after clearly communicating to the client the availability and benefits of using a qualified interpreter, the client specifically rejects the services of the qualified interpreter and requests the services of a relative or significant other. If this occurs it must be mentioned in the client's case notes.

Interpreters will be made available at no cost to the client. To the extent possible qualified interpreters shall be available on the premises or accessible by telephone during business hours, 8:00 am to 4:30 pm.

DuPage County Community Services shall post multilingual notices regarding services for person who are limited-English-speaking in the client waiting area.

Below is a breakdown of languages in DuPage County.

		Top Twenty Languages (other than English) spoken in DuPage County					
		2016			2017		
		2016 Total	2016 Very Well	2016 Less Than Very Well	2017 Total	2017 Very Well	2017 Less Than Very Well
	Total Population 5 years and over:	874,837			875,837		
	Speak only English	645,603			627,382		
1	Spanish:	91,913	61,336	30,577	96,471	63,442	33,029
2	Polish:	17,966	10,006	7,960	16,676	10,204	6,472
3	Gujarati:	12,123	6,133	5,990	11,168	8,418	2,750
4	Chinese (incl. Mandarin, Cantonese):	11,989	6,951	5,038	10,701	6,132	4,569
5	Urdu:	11,395	9,035	2,360	15,774	12,978	2,796
6	Tagalog (incl. Filipino):	10,173	7,368	1,805	9,154	7,334	1,820
7	Hindi:	6,648	4,822	1,826	6,875	5,892	983
8	Italian:	5,839	4,067	1,772	6,315	4,633	1,682
9	Arabic:	5,755	4,223	1,532	7,319	5,354	1,965
10	Greek:	4,418	3,306	1,112	4,841	3,925	916
11	Vietnamese:	3,980	1,951	2,029	5,367	3,316	2,051
12	Malayalam, Kannada, or other Dravidian languages	3,695	2,833	862	2,807	2,124	683
13	German:	3,657	3,264	393	3,230	2,827	403
14	Ukrainian or other Slavic languages:	3,651	2,049	1,602	6,129	4,015	2,114
15	Tamil:	3,307	2,767	540	1,746	1,480	266
16	Telugu:	3,223	2,526	697	4,843	3,681	1,162
17	Nepali, Marathi, or other Indic languages:	3,163	2,150	1,004	2,825	2,562	263
18	Korean:	2,846	1,451	1,395	3,015	1,208	1,807
19	French (incl. Cajun):	1,894	1,672	222	1,533	1,184	349
20	Thai, Lao, or other Tai-Kadai languages:	1,748	1,748	966	1,068	633	435