



City of Galesburg

Operating Under Council – Manager Government Since 1957

TITLE VI PLAN

Adopted on: January 16, 2018

Adopted by: Galesburg City Council

This policy is hereby adopted and signed by:

City of Galesburg

Executive Name/Title:

John Pritchard, Mayor

Executive Signature:

Policy Statement

The **City of Galesburg** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Illinois Department of Transportation (IDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

The **City of Galesburg's** Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

TITLE VI Notice to the Public

The **City of Galesburg's** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

THE CITY OF GALESBURG

- ✓ The **City of Galesburg** 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 the **City of Galesburg**.
- ✓ For more information on the **City of Galesburg's** civil rights program, and the procedures to file a complaint, contact Bradley Nolden, City Attorney, at 309/345-3680; email: bnolden@ci.galesburg.il.us or visit our administrative offices at City Hall, 55 W. Tompkins Street, Galesburg, Illinois 61401. For more information, visit www.ci.galesburg.il.us
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the 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, contact 309-345-3629.

The **City of Galesburg's** Notice to the Public is posted in the following locations:

- City website www.ci.galesburg.il.us
- Public areas of City Hall
- Inside transit vehicles
- Rider Guides
- Transit Maintenance Facility

Title VI Complaint Procedure

The **City of Galesburg's** Title VI Complaint Procedure is made available in the following locations:

- City website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the Administration offices at City Hall
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **City of Galesburg** may file a Title VI complaint by completing and submitting the City's Title VI Complaint Form.

The **City of Galesburg** investigates complaints received no more than 180 days after the alleged incident. The **City of Galesburg** will process complaints that are complete.

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

The **City of Galesburg** has 14 days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has 14 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 14 business days, the city can administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) 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 letter of finding (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 14 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 309/345-3680.

Title VI Complaint Form

The **City of Galesburg's** Title VI Complaint Procedure is made available in the following locations:

- City website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the Administration office at City Hall
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

| | | | | |
|---|-------------|--|-------------------|----|
| Section I: | | | | |
| Name: | | | | |
| Address: | | | | |
| Telephone (Home): | | | Telephone (Work): | |
| Electronic Mail Address: | | | | |
| Accessible Format Requirements? | Large Print | | Audio Tape | |
| | 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 | | | | |
| 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 City? | | | Yes | No |
| Section V | | | | |
| Have you filed this complaint with any other Federal, State, or local City, or with any Federal or State court? | | | | |

| | |
|--|---|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| If yes, check all that apply: | |
| <input type="checkbox"/> Federal City: _____ | |
| <input type="checkbox"/> Federal Court _____ | <input type="checkbox"/> State City _____ |
| <input type="checkbox"/> State Court _____ | <input type="checkbox"/> Local City _____ |
| Please provide information about a contact person at the City/court where the complaint was filed. | |
| Name: | |
| Title: | |
| City: | |
| Address: | |
| Telephone: | |
| Section VI | |
| Name of City 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:

HR and Risk Manager/Title VI Coordinator
 City of Galesburg
 55 West Tompkins Street
 City of Galesburg, Illinois, 61401

List of Transit Related Title VI Investigations, Complaints and Lawsuits

| | | |
|------------------------|-------------------|--------------|
| Subrecipient: | | |
| Contact Person: | Signature: | Date: |

Check One:

_____ There have been no investigations, complaint and/or lawsuits filed against us during the report period.

_____ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

| | 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. | | | | |

Public Participation Plan

| | | |
|------------------------|-------------------|--------------|
| Subrecipient: | | |
| Contact Person: | Signature: | Date: |

Strategies and Desired Outcomes

To promote inclusive public participation, the **City of Galesburg** will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio and/or newspaper ads on stations and in publications that serve LEP populations.
- ✓ Utilize city website to publicize transit issues.

Documented Public Outreach

The direct public outreach and involvement activities conducted by the **City of Galesburg** are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to IDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

| Event Date | City of Galesburg Staffer(s) | Event | Date Publicized and Communication Method (Public Notice, Posters, Social Media) | Outreach Method (Meeting, Focus Group, Survey, etc). | Notes (Meeting size and format, location, Number of Attendees, etc.) |
|------------|------------------------------|-------|--|---|---|
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Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **City of Galesburg** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

The **City of Galesburg's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **City of Galesburg** has conducted a *Four Factor Analysis*¹ of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP Four Factor Analysis

- **Factor 1: Demography:** What is the number or proportion of LEP persons served and the languages spoken in the service area?

Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **City of Galesburg** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data²

¹ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

² The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

The **City of Galesburg** did the following:

1. Inserted a copy of the **City of Galesburg's** Knox county LEP data in the Title VI plan. This data was found at the website: U. S. Census Factfinder.
 2. Analyzed the LEP demographic data for the **City of Galesburg's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less) the **City of Galesburg** must provide translation of vital documents in written format for the non-English users.
 - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
 3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.
- ✓ **Factor 2: Frequency:** How often does your staff (and/or contractor/lessee) come into contact with LEP persons?

Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which **City of Galesburg** staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

Factor 3: Importance: How does the program, service or activity affect people's lives?

Overview

The summary below discusses how the **City of Galesburg's** program and services impact the lives of person's within the community. The City of Galesburg will specify the community organizations that serve LEP persons, if available.

- ✓ **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the low cost methods used by the **City of Galesburg** to provide outreach to LEP persons as well as train staff (and/or its contractor/lessee) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, the City of Galesburg will address the following elements:

- Item #2:* A description of how language assistance services are provided by language
- Item #3:* A description of how LEP persons are informed of the availability of language assistance service
- Item #4:* A description of how the language assistance plan is monitored and updated
- Item #5:* A description of how employees are trained to provide language assistance to LEP persons

And, any additional information deemed necessary.

City of Galesburg – Summary of the Language Assistance Plan Components

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| Item #1 – Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i> |
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Factor 1 – Demography

The **City of Galesburg** assists a non-profit transit provider who provides transportation services for the city.

The US Census Bureau – American Fact Finder (2010) reports there are numerous languages spoken in Knox County. Some of these languages include Spanish, French, German, Italian, Chinese, Japanese, and other African languages. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **City of Galesburg** must provide translation of vital documents in written format for non-English speaking persons.

Knox County has an estimated population of 49,530, with 1,421 persons who identify as Spanish speaking. Of those Spanish speaking individuals, 547 indicate they “speak English less than well”. This language group is approximately 1% and well below the 5% threshold. This means the **City of Galesburg** is not required to provide written translation of documents. All of the other language groups

listed above are also below the safe harbor threshold. This means that at this time, the **City of Galesburg** is NOT required to provide written translation of any document in any language other than English.

Even though the **City of Galesburg** is below the safe harbor threshold and is not required to provide written translation of documents, it does publish operating hours, fare schedule, transfer points, and holidays in Spanish on its website.

In the future, should the **City of Galesburg** meet the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Factor 2 – Frequency

The **City of Galesburg** (and its contractor/lessee, if relevant) will be trained on what to do when they encounter a person that speaks English less than well. The **City of Galesburg** and/or its contractor/lessee will consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **City of Galesburg's** programs and services.

The **City of Galesburg's** contractor/transit provider provides rides to a significant portion of the population each year. While formal data has not been collected, the contractor has indicated it has encountered a limited number of LEP persons using the service on a regular basis.

Our contractor/transit provider has an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the **City of Galesburg**, if needed to ensure the individual receives access to the transportation service.

Factor 3 – Importance

The **City of Galesburg** and our contractor/transit provider understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.

The **City of Galesburg** has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

The **City of Galesburg's** assessment of what programs, activities and services that are most critical included contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Even though the **City of Galesburg** does not have a separate budget for LEP outreach, the city has worked with our contractor/transit provider to implement low cost methods of reaching LEP persons. For example, the **City of Galesburg** has at least one Spanish speaking person on staff. This has ensured the **City of Galesburg** can provide assistance to LEP Spanish-speaking persons, if needed.

| |
|--|
| Item # 2 – Description of how Language Assistance Services are Provided, by Language |
|--|

The **City of Galesburg** has bilingual individuals on staff. In addition, we work with our transit provider to ensure mechanisms are in place to reach LEP persons in the service area.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

The **City of Galesburg** and its transit provider does the following to inform LEP persons of the availability of language assistance services: publishing operating hours, fare schedules, transfer points and holidays in languages other than English on the City's website.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

The **City of Galesburg** reviews its plan on an annual basis or more frequently as needed. In particular, the **City of Galesburg** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

In addition, representatives of the **City of Galesburg** meet with Galesburg Transit on a regular basis to ensure the Title VI requirements are met. The meetings with Galesburg Transit are open to the public and are held on the 2nd Wednesday of each month at 1:00 pm at the Transit Maintenance Facility.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

City of Galesburg employees are oriented on the principles of Title VI and the **City of Galesburg's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The **City of Galesburg** will ensure its contractor/transit provider also educates its staff on Title VI requirements, and specifically LEP provisions.

An important discussion point is that of language assistance. If a driver, dispatcher or employee needs further assistance related to LEP program participants, her/she will work with the **City of Galesburg's** Title VI Coordinator and/or its contractor/transit provider to identify strategies to meet the language needs of the participants of the program or service.

The **City of Galesburg** will meet with Galesburg Transit at least annually to discuss updates the **City of Galesburg's** Language Assistance Plan.

Minority Representation Information

A. Minority Representation Table

The table below depicts the racial composition of the **City of Galesburg's** Public Transportation Advisory Committee as compared to the general population of the city.

| Body | Caucasian | Hispanic | African American | Asian American |
|--|-----------|----------|------------------|----------------|
| Population | 81% | 7% | 11% | 1% |
| Public Transportation Advisory Committee | 100% | 0% | 0% | 0% |

B. Efforts to Encourage Minority Participation

*The **City of Galesburg** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City of Galesburg** encourages participation of all its citizens. As vacancies on boards, committees and councils become available, the **City of Galesburg** will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, the **City of Galesburg** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City of Galesburg** will use creative ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and providing transportation if needed for its members.*

Minority Representation Data Collection Form

Name of board, commission, council, etc.

Date:

Dear Member,

As the **City of Galesburg** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any transit-related, non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **City of Galesburg** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the **City of Galesburg**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

___ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

___ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

___ *Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

___ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

___ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Fixed Route Service Standards

Vehicle Load Standards

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 29 passengers for a 30-foot low-floor bus, 12 passengers for 19-foot van, and 14 passengers for a 22-foot van.

| Vehicle Type | Average Passenger Capacities | | |
|-------------------|------------------------------|----------|-------|
| | Seated | Standing | Total |
| 19' Van | 12 | 4 | 16 |
| 30' Low Floor Bus | 29 | 9 | 38 |
| 22' Van | 14 | 4 | 18 |

Vehicle Headway Standards

Transit service operates on four fixed bus routes, 7:00 am until 6:15 pm, Monday through Saturday. Paratransit service operates concurrently with the Transit operations as well as providing evening trips by advance reservations until 10:00 pm.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to major transportation developments, land use connectivity, and transportation demand management.

Policy Headways

| Weekdays/Saturday | Peak | Base |
|-------------------|------|------|
| Hourly Service | 60 | 60 |
| Half-hour Service | 30 | 30 |

On-Time Performance Standards

Ninety (90) percent of the City of Galesburg's transit vehicles will complete their established runs no more than five to ten minutes early or late in comparison to the established schedule/published timetables.

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than ten minutes late. The City of Galesburg's on-time performance objective is 90% or greater. The City of Galesburg continuously monitors on-time performance.

Service Availability Standards

The City of Galesburg will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

Local bus stops are located at every street corner.

Transit Amenities Policy

Installation of transit amenities along bus routes are based on passenger surveys at the stops along those routes. The City of Galesburg has twenty-four bus shelters which provide for a safe and secure transit experience.