

Coles County Title VI Plan

JANUARY 2

Coles County Regional Planning

Authored by: Samantha McCullough, Planner I



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

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted, or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Coles County assures the Illinois Department of Transportation that no persons shall be subject to discrimination, harassment, or denial of service on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, or any other characteristic protected by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012. The aforementioned protected classes shall not be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Coles County further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against contracting agencies.
5. Participate in training offered on Title VI and other nondiscrimination requirements.
6. If reviewed by IDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to IDOT. (refer to Appendix A of this plan)
9. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
10. Submit the information required by FTA Circular 4702.1B to IDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: _____

Printed Name: _____

Coles County Board Chair

“Where, after all, do universal human rights begin? In small places, close to home – so close and so small that they cannot be seen on any maps of the world. Yet they are the world of the individual person; the neighborhood he lives in; the school or college he attends; the factory, farm or office where he works. Unless these rights have meaning there, they have little meaning anywhere. Without concerned citizen action to uphold them close to home, we shall look in vain for progress in the larger world.” – Eleanor Roosevelt

2.0 Introduction and Description of Service

This is a section of the plan which covers general information about the transit agency.

Coles County submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Our contracting agency, currently Dial-A-Ride, is a sub-recipient of FTA funds and provides service in Coles and Douglas Counties. A description of the current Dial-A-Ride system is included in Appendix B.

Title VI Liaison

Darrel Cox
Coles County Board Chair
217-348-0595
County Board Office
Charleston, IL 61920

Alternate Title VI Contact

Samantha McCullough
Planner I/PCOM
217-348-0521
651 Jackson Ave, Room 309
Charleston, IL 61920

Dial-A-Ride must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by IDOT or any other regulatory agency.
- Disseminate Title VI information, including identification of the Title VI Liaison, to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, historically oppressed populations, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Application Requirements

Coles County is not a first-time applicant for FTA/IDOT funding. The following is a summary of the County's current and pending federal and state funding.

Current and Pending FTA Funding

- OP-24-06-FED, Grant # IL-2023-043 in the amount of \$226,255.00
- CVP

Current and Pending IDOT Funding

- OP-24-06-IL, Grant number SFY24 Rural DOAP in the amount of \$ 936,700.00
- CVP

During the previous three years, IDOT did not complete a Title VI compliance review of Coles County. Coles County has not been found to be in noncompliance with any civil rights requirements.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Coles County will remain in compliance with this requirement by annual submission of certifications and assurances as required by IDOT.

2.2 Title VI Plan Concurrence and Adoption

This Title VI Plan received IDOT concurrence [REDACTED]. The Plan was approved and adopted by Coles County during a meeting held on January 14, 2024. The Plan was presented to the Coles County Council on Aging Board for implementation in their own Title VI practices and approved on [REDACTED]. A copy of the resolution and IDOT concurrence email is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public of Rights Under Title VI

3.1 Notice to the Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without discrimination on the basis of race, color, national origin or other protected class.
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations.
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee.

A sample of the notice is included in Appendix D of this Plan.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Coles County's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of the Coles County Courthouse and on the county website at <https://www.colesco.illinois.gov/>.

4.0 Title VI Procedures and Compliance

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, or any other characteristic protected by Title VI of the Civil Rights Act of 1964 by Coles County may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Coles County investigates complaints received no more than 180 days after the alleged incident. Coles County will process complaints that are complete.

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

Coles County has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Coles County may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within

ten (10) business days, Dial-A-Ride can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on Coles County's website. The Notice to Public will be posted at many locations to apprise the public of Coles County's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of the Coles County Courthouse and on the county website at <https://www.colesco.illinois.gov/>.

4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E of the County's Title VI Plan and located under the *County Plans* tab and on Coles County's website <https://www.colesco.illinois.gov/>.

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (IDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Coles County will submit Title VI Plans to IDOT for concurrence on the aforementioned basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Subrecipient Assistance and Monitoring

As a sub-recipient to IDOT, Dial-A-Ride utilizes the subrecipient assistance and monitoring provided by IDOT, as needed. Should Dial-A-Ride have sub-recipients in the future, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Subrecipients and Subcontractors

Coles County is responsible for ensuring that subcontractors and third-party operators (TPOs) are in compliance with Title VI requirements. Subrecipients may not discriminate in the selection and retention of any subcontractors. Dial-A-Ride, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

- 1. Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
- 2. Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, or any other characteristic protected by Title VI of the Civil Rights Act of 1964 in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- 3. Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, or any other characteristic protected by Title VI of the Civil Rights Act of 1964.
- 4. Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Illinois Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information

required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Illinois Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Dial-A-Ride shall impose contract sanctions as appropriate, including, but not limited to:
 - o withholding of payments to the Contractor under the contract until the Contractor complies, and/or cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Dial-A-Ride, Illinois Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with IDOT, Coles County and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Coles County and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of IDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a condition of your agreement with IDOT, vendors and contractors of Coles County shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Dial-A-Ride. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Dial-A-Ride shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Dial-A-Ride.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Coles County must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Coles County in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to IDOT

Coles County has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others

The Public Participation Plan (PPP) for Coles County was developed to ensure that all members of the public, including historically oppressed populations and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Coles County. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Coles County services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Dial-A-Ride operates a transit system within Coles and Douglas Counties. The Language Assistance Plan (LAP) has been prepared to address Dial-A-Ride's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Dial-A-Ride service area there are 649 residents or 1.29% who describe themselves as not able to communicate in English very well (Source: US Census). Dial-A-Ride is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Dial-A-Ride has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Coles County does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility

Dial-A-Ride’s current location is non-residential and plans to expand on the current facility will not encroach on any residential buildings. Therefore, no persons will be displaced or excluded from services due to facility placement. Please see the facility map below for a visual reference.

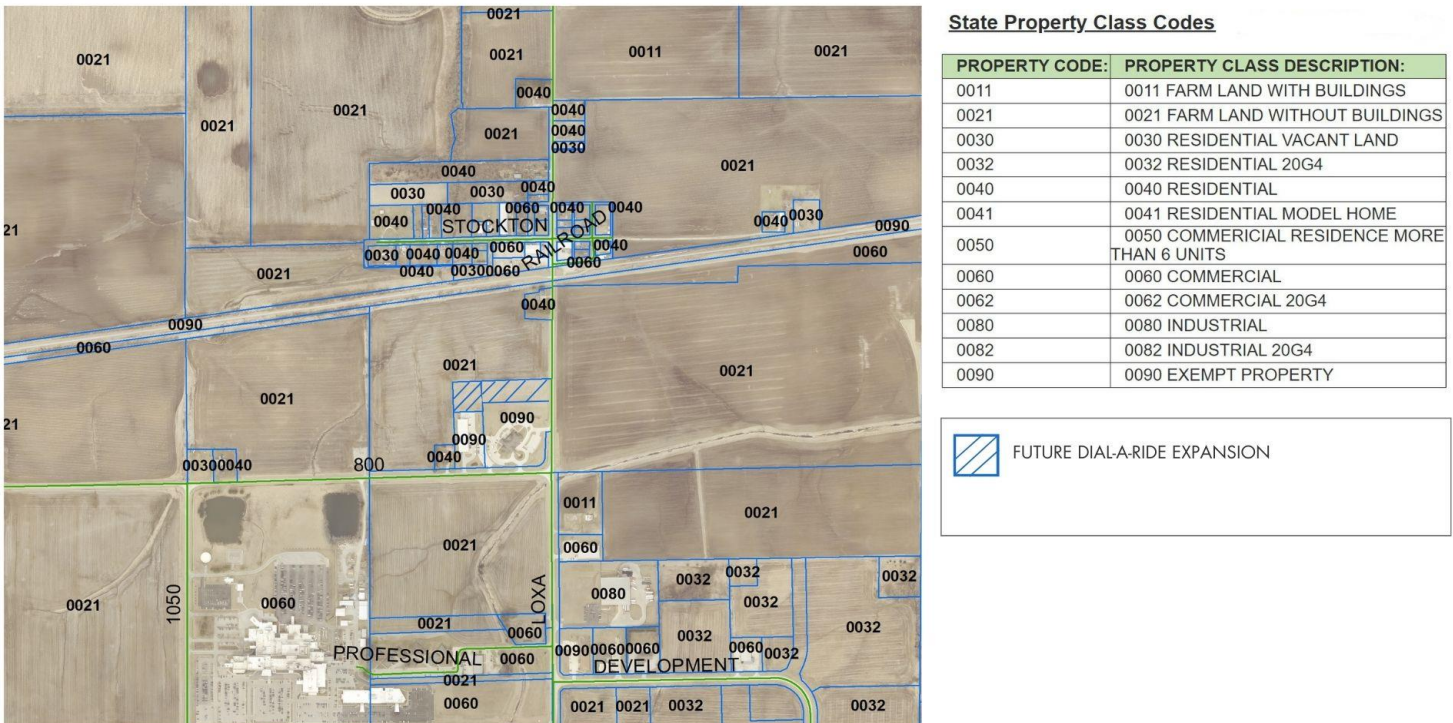


Figure 1. Coles County Center on Aging, Area Property Class

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

10.0 System-Wide Service Standards and Policies

Dial-A-Ride is not a fixed route service provider.

11.0 Appendices

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of historically oppressed populations on such committees

- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions.
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity. (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
- Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Appendix B

Current System Description

Current System Description

1. **An overview of the organization including its mission, program goals and objectives.**

Coles County Council on Aging, Inc./Dial-A-Ride's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

2. **Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.**

Coles County Council on Aging, Inc./Dial-A-Ride is a [non-profit 501 (c)(3)] corporation. Our organization is made up of 28 full-time employees, 5 part-time employees, and 0 volunteers. Our Executive Director is responsible for all of the day-to-day operations of our organization and reports directly to our Board of Directors. Transportation services are provided in accordance with the Coles County Council on Aging's Board of Directors, County, and IDOT's approved Operations Manual/System Safety/Security Program. Our agency staffing plan is outlined in our Organizational Chart (attached). We will continue to provide Coles County with service hours averaging 38 total fleet service hours per day or approximately 9,500 annual service hours (assuming 250 operating days).

3. **Indicate if your agency is a government authority.** Coles County Council on Aging, Inc./Dial-A-Ride operates as a [non-profit 501(c)(3)] corporation with an agreement with the Coles County Board of Directors.

4. **Who is responsible for insurance, training and management, and administration of the agency's transportation programs?**

Coles County Council on Aging, Inc./Dial-A-Ride's management team is responsible for training and management of our transportation program. All safety sensitive employees are required to complete IDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of lifts and securement devices. The Executive Director is responsible for annual renewal of all liability insurance for both IDOT and agency owned vehicles. It is the Operations Director's responsibility to administer all aspects of the transportation program and to control access and usage of all

agency vehicles. The Administrative Director oversees customer service and dispatch staff and practices.

5. Who provides vehicle maintenance and record keeping?

The majority of all maintenance on agency vehicles is provided by Auto Truck and Farm Repair (ATF). ATF employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the IDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 11021 East Co. Rd 800 North, Charleston, IL 61920 and are maintained by the Operations Director. All records are maintained and retained for a minimum of seven (7) years.

6. Number of current transportation related employees

Our public transportation department has a total of 25 employees that include: 18 full-time drivers, 1 part-time driver, 3 administrators, Executive Director, Fiscal Director, and 3 full time dispatchers. Our Coles County specific staff includes 14 full time drivers, 0 part time drivers, and 2 dispatchers.

7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed transport passengers. All our drivers are required to hold a Commercial Driver's License upon hire or within 6 months of hire.

8. A detailed description of service routes and ridership numbers

All transportation services provided through our program are available to the general public. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes vans, modified vans, and buses. 21 of our total 24 vehicles are equipped for mobility device service (17 out of the 19 vans have a lift that are allocated to Coles County transit). We prioritize grouping trips and multi-loading to the maximum extent possible. We make 200 demand response passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage, when able.

Appendix C

Title VI Plan Adoption Meeting Minutes and IDOT Concurrence Letter

Insert a copy of the Title VI Plan adoption meeting minutes and the IDOT concurrence letter.

Appendix D

Title VI Sample Notice to Public



COLES COUNTY CONTRACTING AGENCIES

PUBLIC NOTIFICATION OF RIGHTS UNDER TITLE VI

Coles County operates its programs and services with the understanding that discrimination and/or harassment is prohibited. Coles County employees or contracted agencies shall not exclude, deny the benefits of, or otherwise subject any individual to discrimination or retaliation under any program or activity undertaken by the agency on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, citizenship, national origin, or any other characteristic protected by law in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the County.

For more information on Coles County's civil rights program and the procedures to file a complaint or for translation, please reach out through the following:

Title VI Liaison

Darrel Cox
Coles County Board Chair

Phone

217-348-0595

Email

dcox@co.coles.il.us
smccullough@co.coles.il.us

Alternate Title VI Contact

Samantha McCullough
Planner I/PCOM

Mail

County Board Office
651 Jackson Ave, Room 326
Charleston, IL 61920

You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention:
Title VI Program Coordinator, East Building, 5th Floor - TCR
1200 New Jersey Ave., SE, Washington, DC 20590



Appendix E
Title VI Complaint Form

To submit a Title VI Complaint to the Coles County Title VI Liaison, please complete the following form, sign and print your name with the date, and submit it by mail, email, or in person. You can attach any additional documents you wish to submit to your complaint before sending. If you are mailing or delivering your form in person, please use the following address: Coles County Board Office, 651 Jackson Avenue, Room 326, Charleston, IL 61920. For scanned documents being sent through email: smccullough@co.coles.il.us.

For a copy of Coles County's Title VI Policy or further assistance with the Title VI Complaint Form, please contact: 217-348-0595 or 217-3485021

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Recording
	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 you answered "No" to question 1, please describe your relationship to the person (Complainant) for whom you are filing and why you are filing 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"/> Gender Identity/ Exp. <input type="checkbox"/> National Origin <input type="checkbox"/> Religion <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Other (explain) _____			
Date of Alleged Discrimination (Month, Day, Year): _____			
Who do you believe discriminated against you? _____			

Please provide a brief explanation of the incident(s) and how you feel you were discriminated against, including how you feel others may have been treated differently than you. (If you have additional written material pertaining to your complaint, please attach to the email when submitting this form.)

What remedy are you requesting? _____

Please List any person(s) we may contact for additional information to support or clarify your complaint.

Name	Phone	Email
Name	Phone	Email
Name	Phone	Email

Section IV

Have you previously filed a Title VI complaint with this agency?	Yes	No
--	-----	----

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court ____ State Agency _____

State Court ____ Local Agency _____

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

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint. Please review your documents before submission to ensure all three pages of the complaint form are present so that we can process your complaint. You are required to sign and print your name below with the date.

Signature

Print

Date

Appendix F
Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Coles County was developed to ensure that all members of the public, including historically oppressed populations and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Coles County. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Coles County services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Coles County also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community-based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Coles County's contracting agency and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Coles County will proactively reach out and engage low-income, minority, and LEP populations for the Coles County service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Coles County will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Coles County contracting agencies. Coles County intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Coles County contracting agencies will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Coles County website at <https://www.colesco.illinois.gov> and all feedback on the site will be recorded and passed on to contracting agencies management. The public will also be able to call the Coles County RPC office at 217-348-0521 during its hours of operation. Feedback collected over the phone will be recorded and passed on to contracting agencies management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Dial-A-Ride will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Appendix G
Language Assistance Plan (LAP)

Introduction

Dial-A-Ride operates a transit system within Coles County. The Language Assistance Plan (LAP) has been prepared to address Dial-A-Ride's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Dial-A-Ride service area there are 814 residents or 4.4% who describe themselves as not able to communicate in English "very well" (Source: US Census). Dial-A-Ride is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Dial-A-Ride has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally, recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Dial-A-Ride to be able to communicate effectively with all of its riders. When Dial-A-Ride is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Dial-A-Ride is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Dial-A-Ride undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request

- Translation: Providing timely translation of important documents
- Staffing: Identifying Dial-A-Ride staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Dial-A-Ride services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

- The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Dial-A-Ride program, activity or service.
- The frequency with which LEP persons come in contact with Dial-A-Ride programs, activities or services.
- The nature and importance of programs, activities or services provided by Dial-A-Ride to the LEP population.
- The resources available to Dial-A-Ride and overall costs to provide LEP assistance
-

Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population

Of the 50,447 residents in the Dial-A-Ride service area, 649 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Dial-A-Ride services. For the Dial-A-Ride service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 98.71% speak English “very well”. For groups who speak English “less than very well”, 0.40% speak Spanish and 0.37% speak German.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Dial-A-Ride service area.

Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Dial-A-Ride has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that English is the primary language with a few person only being able to speak Spanish or German. Phone inquiries and staff survey feedback indicated that Dial-A-Ride dispatchers and drivers

interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Dial-A-Ride has had no requests for translated documents.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People's Lives

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

Dial-A-Ride will perform passenger surveys to collect data on usage and access of Dial-A-Ride Services. In past surveys, the most common age among all participants in surveys was 65 and older.

Factor 4: The Resources Available to the Recipient and Costs

Dial-A-Ride assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: documents showing services provided and hours in Spanish. Dial-A-Ride provides a reasonable degree of services for LEP populations in its service area.

Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

- Identifying LEP individuals who need language assistance
- Providing language assistance measures
- Training staff
- Providing notice to LEP persons
- Monitoring and updating the plan

The five elements are addressed below.

Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Dial-A-Ride has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 98.71% of the service area population speaks English only. The largest non-English spoken language in the service area is

Spanish at 0.40%. Of those whose primary spoken language is Spanish, approximately 0.40% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 0.89% of the service area population.

Dial-A-Ride may identify language assistance need for an LEP group by:

- Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
- Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Dial-A-Ride has undertaken the following actions to improve access to information and services for LEP individuals:

- Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
- When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Dial-A-Ride will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Dial-A-Ride, the most important staff training is for Customer Service Representatives and transit drivers.

The following training will be provided to Customer Service Representative:

- Information on Title VI Procedures and LEP responsibilities
- Documentation of language assistance requests
- How to handle a potential Title VI/LEP complaint

Element 4: Providing Note to LEP Persons

Dial-A-Ride will make Title VI information available in English on the Agency's website. Key documents are written in English. Notices are also posted in Dial-A-Ride office lobby, on buses, and at Coles County. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Dial-A-Ride's financial resources are sufficient to fund language assistance resources needed

Dial-A-Ride understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of the system easier. Dial-A-Ride is open to suggestions from all sources, including customers, Dial-A-Ride staff, other

transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Dial-A-Ride service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Dial-A-Ride does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 people.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Dial-A-Ride may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H

Operating Area Language Data: Dial-A-Ride Service Area

Figures obtained from the 2020 Decennial Census as available. (*) Figure not yet available for update

<u>Language</u>	<u>Coles Co. Residents</u>	<u>Percent of Population</u>
Total	46,863	100
Speak only English	48555	96.3
Spanish or Spanish Creole	655	1.30
Speak English "very well"	455*	0.90*
Speak English less than "very well"	200*	0.40*
French (incl. Patois, Cajun)	52*	0.10*
Speak English "very well"	40*	<.1*
Speak English less than "very well"	12*	<.1*
French Creole	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Italian	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Portuguese or Portuguese Creole	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
German	268*	0.53*
Speak English "very well"	82*	0.16*
Speak English less than "very well"	186*	0.37*
Yiddish	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Other West Germanic languages	18*	<.1*
Speak English "very well"	18*	<.1*
Speak English less than "very well"	0	0
Scandinavian languages	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Greek	173*	0.34*
Speak English "very well"	173*	0.34*
Speak English less than "very well"	0	0
Russian	38*	<.1*
Speak English "very well"	26*	<.1*
Speak English less than "very well"	12*	<.1*
Polish	14*	<.1*
Speak English "very well"	14*	<.1*
Speak English less than "very well"	0	0
Serbo-Croatian	22*	<.1*
Speak English "very well"	22*	<.1*
Speak English less than "very well"	0	0
Other Slavic Languages	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Armenian	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0

<u>Language</u>	<u>Coles Co. Residents</u>	<u>Percent of Population</u>
Persian	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Gujarati	31*	<.1*
Speak English "very well"	0	0
Speak English less than "very well"	31*	<.1*
Hindi	18*	<.1*
Speak English "very well"	18*	<.1
Speak English less than "very well"	0	0
Urdu	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Other Indic languages	52*	0.10*
Speak English "very well"	2*	<.1*
Speak English less than "very well"	50*	<.1*
Other Indo-European Languages	129	1.5*
Speak English "very well"	129*	0.26*
Speak English less than "very well"	0*	0
Chinese	134*	0.27*
Speak English "very well"	112*	0.22*
Speak English less than "very well"	22*	<.1*
Japanese	14*	<.1*
Speak English "very well"	9*	<.1*
Speak English less than "very well"	5*	<.1*
Korean	4*	<.1*
Speak English "very well"	4*	<.1*
Speak English less than "very well"	0	0
Mon-Khmer, Cambodian	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Hmong	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Thai	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Laotian	4*	<.1*
Speak English "very well"	0	0
Speak English less than "very well"	4*	<.1*
Vietnamese	38*	<.1*
Speak English "very well"	21*	<.1*
Speak English less than "very well"	17*	<.1*
Other Asian languages	77*	<.1*
Speak English "very well"	18*	<.1*
Speak English less than "very well"	59*	0.15*
Tagalog	23*	<.1*
Speak English "very well"	23*	<.1*
Speak English less than "very well"	0	0
Other Pacific Island languages	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Navajo	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0

<u>Language</u>	<u>Coles Co. Residents</u>	<u>Percent of Population</u>
Other Native American languages	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Hungarian	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
Arabic	59*	0.12*
Speak English "very well"	42*	<.1*
Speak English less than "very well"	17*	<.1*
Hebrew	0	0
Speak English "very well"	0	0
Speak English less than "very well"	0	0
African languages	35*	<.1*
Speak English "very well"	35*	<.1*
Speak English less than "very well"	0	0
Other and unspecified languages	34*	<.1*
Speak English "very well"	0	0
Speak English less than "very well"	34*	<.1*

Appendix J
Title VI Equity Analysis

None

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Responsible Party (Signature)	Remarks