

TITLE VI Notice to the Public

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

Notifying the Public of Rights Under Title VI

THE CITY OF QUINCY

- ✓ The City of Quincy 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 Quincy.
- ✓ For more information on the City of Quincy's civil rights program, and the procedures to file a complaint, contact 217-228-4500; or visit our administrative offices at 730 Maine Street, Quincy, IL 62301. For more information, visit <http://www.quincyl.gov>
- ✓ 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 217-228-4500.

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

- City website <http://www.quincyl.gov>
- Public areas of City Hall
- Inside transit vehicles
- Rider Guides
- Transit Maintenance Facility

Title VI Complaint Procedure

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

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

Once the complaint is received, the **City of Quincy** 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 Quincy** 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 217-228-4500.

Title VI Complaint Form

The **City of Quincy'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):				

Race

 Color

 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
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Section V

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

Yes

 No

If yes, check all that apply:

Federal City: _____

Federal Court _____

 State City _____

State Court _____

 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 Quincy
730 Maine Street,
Quincy, Illinois 62301

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.				

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **City of Quincy** 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 Quincy'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 Quincy** 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?

¹ DOT LEP guidance <https://www.civilrights.dot.gov/page/dots-lep-guidance>

Overview

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

US Census and American Community Survey (ACS) Data²

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

1. Inserted a copy of the **City of Quincy's** Adams 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 Quincy'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 Quincy** 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?

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>

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 Quincy** 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 Quincy's** program and services impact the lives of person's within the community. The City of Quincy 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 Quincy** 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 Quincy 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 Quincy – Summary of the Language Assistance Plan Components

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

Factor 1 – Demography

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

*The US Census Bureau – American Fact Finder (2016) reports there are numerous languages spoken in the **City of Quincy**. Some of these languages include Spanish, other Indo-European language, Asian and Pacific Island languages, and other 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 Quincy** must provide translation of vital documents in written format for non-English speaking persons.*

*The City of Quincy has an estimated population of 40,531, an estimated household number of 17,315, with Spanish being spoken in 134 households, 141 households speaking other Indo-European languages, 162 household speaking Asian and Pacific Island languages, and 41 households speaking other languages. This language group is approximately 2% and well below the 5% threshold. This means the **City of Quincy** 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 Quincy** is NOT required to provide written translation of any document in any language other than English.*

*In the future, should the **City of Quincy** 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 Quincy** (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 Quincy** 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 Quincy’s** programs and services.*

*The **City of Quincy’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 Quincy**, if needed to ensure the individual receives access to the transportation service.*

Factor 3 – Importance

*The **City of Quincy** 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 Quincy** 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 Quincy'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

*The **City of Quincy** can provide assistance to LEP persons, if needed.*

<p>Item # 2 – Description of how Language Assistance Services are Provided, by Language</p>
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*The **City of Quincy** 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.*

<p>Item # 3 Description of how LEP Persons are Informed of the Availability of Language Assistance Service</p>
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*The **City of Quincy** 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.*

<p>Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated</p>

The **City of Quincy** reviews its plan on an annual basis or more frequently as needed. In particular, the **City of Quincy** 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.

Item # 5	Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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City of Quincy employees are oriented on the principles of Title VI and the **City of Quincy'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 Quincy** 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 Quincy'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 Quincy** will meet with Quincy Transit at least annually to discuss updates the **City of Quincy's** Language Assistance Plan.

Minority Representation Information

A. Minority Representation Table

The table below depicts the racial composition of the **City of Quincy'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 Quincy** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City of Quincy** encourages participation of all its citizens. All races residing in the **City of Quincy** are represented on the transit-related

*committees/ councils. As vacancies on boards, committees and councils become available, the **City of Quincy** will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, the **City of Quincy** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City of Quincy** 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 Quincy** 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 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 Quincy** 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 Quincy**, 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.