

**RESOLUTION NO. 2023-112**

**A RESOLUTION APPROVING DANVILLE MASS TRANSIT'S TITLE VI PROGRAM  
SUBMISSION FOR THE FEDERAL TRANSIT ADMINISTRATION**

**WHEREAS**, The City of Danville / Danville Mass Transit (DMT) is a recipient of federal funds used in public transportation operating and capital projects; and

**WHEREAS**, use of these funds requires compliance with Title VI of the Civil Rights Act of 1964 ("the Act"); and

**WHEREAS**, a Title VI program submission is required pursuant to the Act, Title 49, Chapter 53, Section 5332 of the United States Code, and the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012;

**NOW, THEREFORE, BE IT RESOLVED** by the City Council of the City of Danville, Illinois, that DMT's Title VI program dated August 2022 is approved for submission to the Federal Transit Administration.

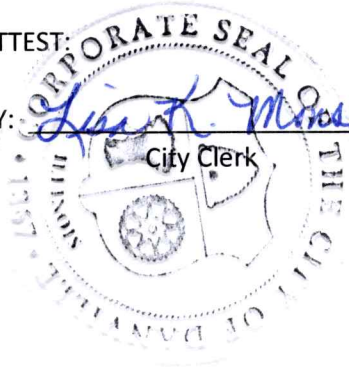
**PASSED** this 3rd day of October 2023, by 13 ayes, 0 nays, 1 absent.

APPROVED:

BY: *Rickey Williams, Jr.*  
Mayor

ATTEST:

BY: *Lisa K. Mason*  
City Clerk



POSTED PUBLICLY OCT 04 2023

# Title VI Program Update

Revised August 2022

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**City of Danville, Illinois**  
**Danville Mass Transit**  
101 N. Jackson St.  
Danville, IL 61832

(217) 431-0653

## **OVERVIEW**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. The Federal Transit Administration (FTA), which provides financial assistance for Danville Mass Transit (DMT), is authorized and directed by the United States Department of Justice to apply provisions of Title VI and to issue applicable rules, regulations, or requirements.

This document explains the Title VI Program from DMT. This program, conducted in cooperation with the Danville Area Transportation Study (DATS), the MPO for Danville, Illinois, is consistent with the principles of Title VI, federal guidelines, and related requirements and is responsive to the needs of Title VI beneficiaries.

### **1. Public Outreach and Involvement Activities**

In the past, DMT coordinated public outreach and involvement activities in partnership with DATS, the area MPO to encourage the involvement of all persons in its activities. While the MPO for Vermilion County will officially dissolve due to the redesignation of the area to a rural status, we will still meet on an unofficial basis, which could provide the opportunity to involve the public in future meetings. A variety of approaches have been utilized to provide communication and consultation with interested parties and members of the public. This section will summarize the activities conducted and the outreach methods used by DMT in implementing its public participation program.

Effective transportation decision-making depends upon understanding and properly addressing the unique needs of different socio-economic groups. Public involvement processes are evaluated and improved, where necessary, to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

#### **Developing a Plan for Participation**

The Federal Guidelines suggest that planning agencies, if available, and transit providers working with the community, should develop a plan for how and when citizens will be involved in each transportation planning and project development activity. This public participation plan should include the following elements:

1. Clearly defined agency transportation goals and objectives;
2. Be integrated fully into the overall planning process;
3. Identify key issues and decision points and how they related to citizen participation activities;

4. Describe citizen participation mechanisms to be used and the timing of such efforts; including efforts to notify the public of informational materials that will be prepared for the public;
5. Establish procedures for considering public comments and responding to those comments;
6. Commit adequate resources, including staff, money for printing, and technical assistance, where needed;
7. Provide for periodic evaluation of effectiveness of the citizen participation program in order to identify weaknesses and modify participation efforts when necessary.
8. Provide alternative formats for the dissemination of informational material.

Meaningful public and stakeholder involvement is critical to the long-term success of DMT. The objectives of this participation plan are to establish guidelines to: **Inform** the public in a timely manner of policies, progress of specific projects and issues related to the planning process using a variety of formats; **Involve** all stakeholders with early opportunities for participating in the decision-making process; **Attend** to citizen concerns and ideas; **Learn** from collected information and stakeholders' ideas to develop consensus and resolve conflict, to generate better planning decisions; **Develop** an effective outreach process that includes an integrated feedback process for evaluation and improvement; **Reflect** regularly on the measured effectiveness of participation strategies, and make subsequent changes to seek greater future success.

DATS, the former MPO for Vermilion County, produced a Unified Planning Work Program annually and prepared a Public Involvement Policy. These two documents provide all of the elements suggested by the Federal guidelines. The Unified Planning Work Program delineates transportation issues, goals and objectives within the context of the overall planning process for the Danville Urbanized Area. The Public Involvement Policy discusses the aspects of the citizen involvement in transportation planning and describes the specific techniques to be used in the citizen involvement process. These two tools can be used by DMT to effectively share information.

Further, DMT is governed by the City Council of Danville, and all meetings are public meetings conducted in compliance with the Open Meetings Act. Agendas are made public in advance, the meetings are open and accessible to all citizens, and comments from the



public are received at every meeting. Transit-related matters are dealt with in this public forum.

### **Identifying Public Participants**

DMT and the MPO had conducted a varied and ongoing program for gathering information and views from all sectors of the public for its transportation planning and programming work. It is in the best interest of DMT to continue this tried and true process. The Federal Guidelines suggest that a list of people to be informed about a planning activity should be developed and expanded regularly. A mailing list was created that includes members of the MPO, persons who have requested to be notified of each meeting, plus advocates of representatives of minority groups, people with disabilities and the senior population. All activities are open to the public. The locations are well dispersed through the region, include environmental justice communities, and are almost always served by public transportation. In conducting its activities, DMT strives to meet the needs of people requiring special services. The use of a virtual format has been formulated and the participants are given information regarding these virtual meetings. These options were initiated during the COVID-19 restrictions in 2020-2022.

### **Outreach Methods**

DMT's outreach methods generally serve either or both of two purposes: notification and provision of informational materials and reports. The Federal Guidelines suggest a broad variety of techniques to keep the public informed. DMT takes a proactive approach to identifying and articulating environmental justice issues in the region. Methods include:

- Identifying and connecting with existing and new contacts and sources of information for the planning process
- Collecting and reporting information on the transportation needs of minority, LEP, and low-income populations for consideration in transit planning
- Encouraging and facilitating participation in the planning process
- Providing updates on our website and Facebook page.

DMT provides public notifications in a variety of ways, such as legal notices, press releases with local newspapers, emailing of flyers and notices, postings in the Richard Brazda Bus Terminal and guarantees public notice of a meeting will be made at least five

days in advance of the meeting. The City maintains a list of all committees, subcommittees, units of government, and interested parties. Citizens may add their names to this list by notifying the DMT office at (217) 431-0653.

Meetings intended for public participation will be held as frequently as deemed necessary. Regular meetings had been held monthly: DATS Technical met and will continue to meet in unofficially on the first Thursday of each month at 10:30 am at City Hall, 17 W. Main St, Danville. All MPO participants agree that the meetings of the technical committee should continue for the purpose of information sharing. The Danville City Council holds two regular meetings and two committee meetings each month on Tuesday nights at 6:00 p.m.; all meetings are held at City Hall, 17 W. Main St, Danville.

In addition to informing the citizens of meetings and public hearings, the public is encouraged to participate during the discussion of each agenda item. To facilitate public involvement in the development of a document or project, copies of each document discussed at meetings are made available for public inspection prior to each meeting and are given to individuals upon request. City Council agendas are made public in advance of the meeting as well to facilitate public participation and may be found on the City of Danville's website: [www.cityofdanville.org](http://www.cityofdanville.org)

DMT will continue to expand its outreach to neighborhoods of concern and broaden its direct contact with minority, LEP, and low-income residents in these communities. The goal is to identify specific community needs and to facilitate answers and possible actions by responsible agencies.

### **Evaluation of Public Participation Efforts**

Periodic review of public participation activities to evaluate program effectiveness is required by federal regulations (23 CFR 450.212(a)(7)). Overall evaluation of public participation efforts on a regular basis helps answer whether the program is meeting the key participation plan objectives. Through the evaluation process, a participation program can be refined and improved.

DMT uses the four tools developed by the MPO to measure the effectiveness of public outreach efforts. These tools include: mailing lists, public forums, open meetings, and the internet. The quantitative and qualitative measures are compiled and analyzed against previous participation evaluations to determine net change in participation, which will be presented and discussed to determine the effectiveness of the tools.

### **Additional Outreach Efforts**

DMT collects comments from transit riders and community members on an ongoing basis. Comments are received in person and by phone, mail, e-mail, and a FaceBook page. Periodically, online surveys were made available for all community members to complete, and verbal feedback is taken over the phone or in person.

### **2. Language Assistance for Persons with Limited English Proficiency (LEP)**

See Appendix A, “Improving Access for People with LEP, Implementation Plan.”

### **3. Procedures for Tracking and Investigating Title VI Complaints**

See Appendix B, “Title VI Internal Review Process for Service Delivery and Capital Programs.”

### **4. Title VI Investigations, Complaints, or Lawsuits**

There had been no lawsuits against DMT involving discrimination with respect to transit service or benefits from the date of the last published Title VI program until now. One complaint was made and resolved on the local level, regarding the use of face masks on the public buses during the COVID-19 restrictions.

### **5. Public Notices of Compliance with Title VI**

DMT informs the public of their protections under Title VI with information and compliance statements on the agency’s web site home page at [www.rideDMT.org](http://www.rideDMT.org). These statements include the process for filing a Title VI discrimination complaint and a link to the complaint form in electronic format and are available in Spanish, as well.

A statement of DMT’s Title VI information and complaint procedure is printed on the “system map” informing passengers of DMT’s commitment to providing Title VI-compliant service. This information invites passengers to contact the Director for information about our non-discrimination policies and information concerning filing a complaint.

A non-discrimination notice is posted inside each vehicle operated by DMT and invites riders to do the same. There are non-discrimination notices posted in our contracted ADA buses and in the Richard Brazda Bus Terminal, as well as in the DMT offices at 101 N. Jackson.

Samples of these materials are provided in the Appendix C.



## 6. Board Demographics

DMT is a department within the City of Danville, Illinois. The City of Danville is an Aldermanic form of municipal government with a Mayor elected at large and a City Council of 14 Aldermen representing 7 wards. The day to day administrative duties are entrusted to the Mayor and the City Council is the legislative body adopting resolutions and ordinances.

### Demographic Data:

Position	Name	Gender	Race/Ethnicity/Color
Mayor	Rickey Williams Jr.	Male	Multiracial
Alderman (Ward 1)	Robert Williams	Male	African American or Black
Alderman (Ward 1)	Ed Butler	Male	African American or Black
Alderman (Ward 2)	Carolyn Wands	Female	Caucasian or White
Alderman (Ward 2)	Rick Strebing	Male	Caucasian or White
Alderman (Ward 3)	Heidi Wilson	Female	Caucasian or White
Alderman (Ward 3)	Sherry Pickering	Female	Caucasian or White
Alderman (Ward 4)	Mike O'Kane	Male	Caucasian or White
Alderman (Ward 4)	Tricia Teague	Female	African American or Black
Alderman (Ward 5)	Mike Puhr	Male	Caucasian or White
Alderman (Ward 5)	Eve Ludwig	Female	Caucasian or White
Alderman (Ward 6)	James Poshard	Male	Caucasian or White
Alderman (Ward 6)	Jon Cooper	Male	Caucasian or White
Alderman (Ward 7)	Bob Iverson	Male	Caucasian or White
Alderman (Ward 7)	Darren York	Male	Caucasian or White



DMT has an employee advisory committee to review and edit policies and plans in regards to operations. The demographic data of the DMT's Transit Advisory Committee (TAC) is:

Position	Name	Gender	Race/Ethnicity/Color
Co-Chair	Lisa Beith	Female	Caucasian or White
Co-Chair	Petro Poulos	Male	Caucasian or White
Risk Manager, COD	Kathy Courson	Female	Caucasian or White
Employee member	OPEN	-	-
Employee member	Julie Groppi	Female	Caucasian or White
Employee member	OPEN	-	-
Employee member	Heath Eldridge	Male	Caucasian or White
Employee member	OPEN	-	-

*Due to COVID-19 restrictions in 2020-2022, committee meetings were disrupted. Three members left employment and committee activities have not yet resumed.*

#### **7. Service Standards and Policies**

The Federal Transit Administration (FTA) requires that all fixed route providers of public transportation, comply with the provisions of Title VI, must develop quantitative standards and qualitative policies. DMT's Service Standards and Policies are provided in Appendix D.

#### **8. Equity Analysis to Determine Site or Location of Facilities**

DMT added a transfer facilities in 2016. It is located in the same location as the prior transfer pad with more amenities.

## APPENDIX A

# **Improving Access for People with Limited English Proficiency (LEP)**

## **Four Factor Analysis**

Danville Mass Transit (DMT) has conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the FTA.

### **Analysis Using Four Factor Framework**

DMT has conducted the following analysis using the four factors identified in the DOT LEP Guidance:

- I. **Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population**

#### Task 1, Step 1: Examine prior experiences with LEP individuals.

Nearly all DMT riders speak English as the primary language and are proficient with English. DMT bus operators report very few encounters with LEP individuals riding transit in Danville. When LEP persons do access DMT's services they are usually Spanish-speaking Hispanics/Latinos.

#### Task 1, Step 2: Become familiar with data from the U.S. Census.

The 2010 Census sample size in Vermilion County was too small to provide much useful data. See American Community Survey, U.S. Census Bureau, 2010 (see Appendix A.1). Census data describes the following population distribution by race/ethnic group:

*There is still no new data reported on the website. This data is from the 2010 Census and it's likely that it is not a true indicator of the demographics of the area in 2022/2023.*

White:	20,210 (62.22%, <a href="#">#1290</a> )
Black:	10,281 (31.65%, <a href="#">#58</a> )
Hispanic:	2,020 (6.22%, <a href="#">#331</a> )
Asian:	595 (1.83%, <a href="#">#269</a> )
Native (American Indian, Alaska Native, Hawaiian Native, etc.):	219 (0.67%, <a href="#">#123</a> )
One Race, Other:	519 (1.60%, <a href="#">see rank</a> )
Two or More Races:	659 (2.03%, <a href="#">see rank</a> )

The information above was taken from <http://www.usa.com/danville-il-population-and-races.htm#PopulationbyRaces>. In this website, the Hispanic/Latino population of Danville, IL is at 6.22% of the general population. While the data offers no conclusions about English proficiency, it does indicate there may be a need for Spanish language assistance to improve access to public transportation. DMT has a bus operator who is proficient in Spanish and has served as liason at events in the community. Additionally, there are apps that employees upload to their phones that provide translation services to lessen the likelihood that the wrong information is shared with customers.

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves.

As of August 2022, DMT's service area is defined by the corporation limits of Danville, Tilton, Westville, and Georgetown, Illinois. See map in Appendix A.2. With the new rural designation, the service area will likely change. It is presumed that areas south of the Danville corporation limits may not be served using the fixed route system, but served by the area's demand/response system.

Task 1, Step 2B: Obtain Census data on the LEP population in your service area.

See Appendix A.1 and comments above under Task 1, Step 2.

Task 1, Step 2C: Analyze the data you have collected.

Our daily experiences are revealing that there is no significant LEP population in the DMT service area. Of those who may not speak English well are people who speak mostly Spanish.

Task 1, Step 2D: Identify any concentrations of LEP persons within your service area.

There are no concentrations of LEP persons within DMT's service area.

Task 1, Step 3: Consult state and local sources of data.

The Illinois Department of Education reports that in 2015 there were less than 200 public school students in Vermilion County enrolled in English Language Learner programs. Statewide, Spanish was the language spoken by most non-English speaking people (90% of LEPs).

Task 1, Step 4: Community organizations that serve LEP persons.

The Danville Area Community College (DACC) Hispanic Recruitment and Retention Team is a community organization serving the Latino population. The group hosts an annual Hispanic/Latino Awareness Fair at the community college.

The City of Danville Human Relations Administrator coordinates human relations activities of the city with specific focus upon minority groups, including the Hispanic/Latino community.

Task 1, Step 4A: Identify community organizations.

DACC Hispanic Recruitment and Retention Team

Individuals involved with the City of Danville Human Relations Administrator's outreach activities

Task 1, Step 4B: Contact relevant community organizations.

DMT personnel will make contact with the DACC Hispanic Recruitment and Retention Team on a regular basis to obtain information about the Hispanic community and its needs for improved access to public transportation. Further, DMT will seek opportunities to be involved in outreach efforts coordinated by the City of Danville Human Relations Administrator.

Task 1, Step 4C: Obtain information.

See Task 1, Step 4B.



II. **Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services**

Task 2, Step 1: Review the relevant programs, activities, and services you provide.

It can be assumed that LEP individuals inquire about, use, and are affected by the services that DMT provides on an occasional basis. Services include fixed route service, paratransit service (contracted to another provider), and Dial-a-Ride (deviation to the fixed route) services. LEP individuals also come into contact with DMT by calling our office, reading printed information, or visiting the web site. With the addition of ticket sales for the Greyhound/Flix bus, associations with LEP customers increases.

Task 2, Step 2: Review information obtained from community organizations.

See Task 1, Step 4B.

Task 2, Step 3: Consult directly with LEP persons.

See Task 1, Step 4B.

III. **Factor 3: The importance to LEP persons of your program, activities, and services**

Task 3, Step 1: Identify your agency's most critical services.

It is assumed that DMT's most critical services are:

- Fixed routes
- Paratransit (contracted to another provider)
- Deviations to fixed route

If Limited English is a barrier to using these services then the consequences for the individual is serious, including limited access to obtain health care, education, or employment. Critical information from DMT which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information about how to ride
- Communication related to transit planning
- Information about paratransit services

Task 3, Step 2: Review input from community organizations and LEP persons.

See Task 1, Step 4B.

**IV. Factor 4: The resources available to the recipient and costs**

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.

DMT has provided the following language assistance measures to date:

- Critical information on the web site has been provided in Spanish since 2011.

Cost of these measures has been less than \$500 annually.

- Use of translator apps on cell phones has proved to be a valuable resource when an employee is in a one-on-one discussion with an LEP individual. These apps can be uploaded free of charge.

Task 4, Step 2: Determine what, if any additional services are needed to provide meaningful access.

Due to the small size of our agency and limited resources, DMT has previously focused its language measures on extending access for persons speaking Spanish. The following information has been translated into Spanish:

- Route and schedule information
- Fare and payment information
- Information about how to ride
- Information about paratransit service

This information is available on the web site.

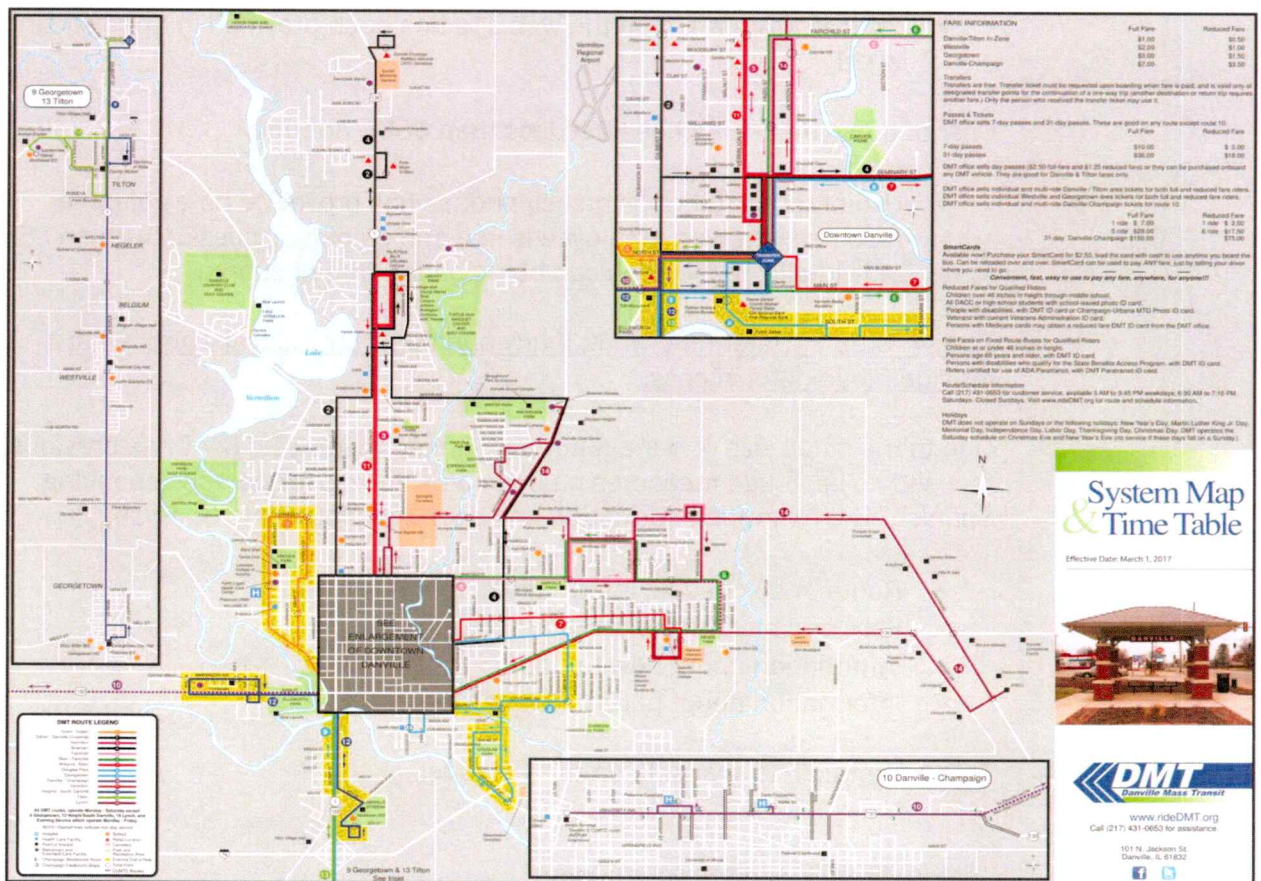
Task 4, Step 3: Analyze your budget.

Like most public agencies, DMT's budget is constrained by several factors, and staff resources are also limited. DMT has devoted limited resources in the printing and advertising/promotional budgets to LEP implementation measures.

Task 4, Step 4: Consider cost effective practices for providing language services.

DMT collaborates with the community organizations identified in Task 1 to provide cost effective practices. DMT partners with these organizations to provide:

- Help with translation of printed and online information.
- Distribution channels for printed information.
- Translation assistance for LEP persons.
- Educational and outreach opportunities to help improve access for LEP persons.





## Plan for Implementation

Danville Mass Transit (DMT) has adopted the following implementation plan to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the FTA.

### **Plan for Implementation**

#### **I. Identifying LEP individuals who need language assistance**

Research and field work completed in the four factor analysis indicates that a small number of Spanish-speaking LEP persons are likely to reside in DMT's service area. Because of limitations in Census data, the number of LEP persons in the population is not known. However, this is also an indicator that as of the date of the data collection, LEP persons do not comprise a significant population in DMT's service area.

#### **II. Language assistance measures**

Language assistance measures may not be necessary given that there is not a significant population of LEP persons in DMT's service area. Nonetheless, DMT has already provided Spanish translation of essential information. The following resources will be used to provide any future language assistance if necessary:

Written and oral language:

- Danville Area Community College (DACC)
- Procurement of professional translation services
- Use of apps to translate written or spoken information
- Assistance from current DMT employees who are proficient in Spanish and are of Hispanic/Latino descent.

It is important for DMT to ensure the competency of interpreters and translation services. DMT will take measures to assure the competency of interpreters in its procurement process.



### **III. Training staff**

DMT employees, staff, and management staff are only occasionally likely to come into contact with LEP persons. Employees include bus operators, dispatchers, supervisors, customer service personnel, and management.

Training on DMT's responsibility to serve LEP persons will be implemented by the following means:

- Orientation and initial training for new bus operators, and ongoing training, will include information on serving LEP persons, with retraining during our TEAM meetings throughout the year.
- Dispatchers, supervisors, customer service personnel, and management staff will take part in ongoing training with at least one training session per year on the topic of serving LEP persons.

#### **Providing notice to LEP persons**

DMT incorporates a variety of methods to communicate with transit users and the public. These include printed schedule information, signs inside of vehicles and facilities, the web site, social media, customer service phone line, news releases, advertising, community meetings, and participation in local events. DMT will use these methods to notify LEP persons of the availability of language assistance, and when applicable, to notify customers of the availability of translated documents.

### **IV. Monitoring and Updating the LEP Plan**

Ongoing outreach efforts will include a process to obtain feedback on DMT's language assistance measures. Monitoring of the program will be assigned to the Director. Specific tasks will include annual contact with the organizations mentioned in the Four Factor Analysis to measure results and discuss needs of LEP persons. These efforts will reveal any changes to the implementation plan that may be necessary, including any noticeable changes in demographics of the LEP population or the availability of new resources.

Based on the feedback received, DMT may make incremental changes to the type of written and oral language assistance provided. Evaluation may result in expansion of language assistance measures that are effective, or the modification or elimination of measures which are not effective.

## APPENDIX B

# **Title VI Internal Review Process for Service Delivery and Capital Programs**

Danville Mass Transit (DMT) has adopted the following procedure and process for the purpose of carrying out Title VI of the Civil Rights Act of 1964. The purpose is to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the Federal Transportation Administration (FTA).

### **V. Responsible Persons**

The following DMT personnel are responsible for administration of this Title VI Program:

- a. Lisa Beith, Director of Public Transportation
- b. Robert McNeil, Operations Superintendent

The following City of Danville personnel are responsible to monitor Title VI activities of DMT:

- a. Sandra Finch, Human Relations Administrator
- b. Rickey Williams, Jr., Mayor

The MPO, in its informal state, can provide technical assistance and DMT is responsible for monitoring Title VI activities in our planning and programming process:

### **VI. Internal Review Process for Service Delivery and Capital Programs**

- a. **Overview:** Until this year, DATS has provided technical assistance with DMT's planning needs. DATS has continuously made best efforts to monitor Title VI activities in DMT's planning and programming process. All transit projects programmed in the Transportation Improvement Program were discussed at technical and policy committee meetings. Minority participation is still encouraged and welcomed at all of the Committees and decision-making meetings.

Should a complaint arise concerning possible discrimination in regard to transit planning, DMT has established a process to address the concerns. The step-by-step process is outlined in the next section.

b. **Monitoring of Title VI Activities:** DATS no longer monitors activities by DMT, but when DMT plans any proposed route modification, additions, deletion, extensions, or service changes, available members formally associated with the MPO review the information to give us technical advice. Using 2010 Census block maps, staff determines which changes potentially affect higher than average concentrations of minority populations. Should the proposed changes relate to any areas of minority concentrations, the DMT director considers this information in decision-making.

The Community Development and IT departments for the City of Danville maintains maps for each minority category according to U.S. Census data. On each map, those census blocks having a higher than average minority population are highlighted. Overlaid on this information are the bus routes and a quarter mile walking distance area. This information is on file at Public Works for future use.

c. **Information Dissemination:** DMT has several mechanisms for communicating with minority population groups. Formerly, information concerning transportation planning is presented by DATS to its technical and policy committees. Meeting notices were forwarded to representatives of various organizations and neighborhood associations in the area. While specific groups are sent notices, the general public is also invited. Notices of the meetings are sent to all the local media and various municipal departments and agencies. For final public hearings, legal ads are printed in the local newspaper.

When developing the Transportation Improvement Program, minority organizations are notified at various times throughout the process. After all local and state projects are submitted, a summary of the proposed projects is forwarded and made available to the public. In all notices, meeting dates are given when important decisions are made.

When developing the Coordinated Human Services-Transportation Plan an extensive list of human service/social service agencies is contacted, many of whom serve low-income, elderly, minority, and LEP populations. The HSTP for Region 8 is dated 2020. The plan is available online at:

<https://ccrpc.gitlab.io/hstp2020/>

DMT performs its own outreach to minority populations whenever public meetings or hearings regarding route changes are planned. This is accomplished through notices and advertising in Danville Commercial News newspaper, through outreach to churches, social services organizations, housing serving minority populations, and notices aboard DMT buses and in the Bus Terminal. Further, all transit-related matters are considered by the Danville City Council. The city's public notices concerning open meetings are made available to all citizens, including minorities.



**VII. Minority Participation in the Decision-Making Process:**

The primary point of input in the decision-making process is through DMT directly. DMT staff document all public comments received and make the comments available to the director and the Danville City Council to consider in the decision making process. Comments are received in the form of written letters, e-mail, social media, documented phone calls and personal conversations, and comments made at public meetings and hearings. As mentioned, minority population groups are invited to be involved in any or all of these activities, including participation in all transit-related planning meetings.

**VIII. Process for Discrimination Complaints**

Should a complaint arise concerning possible discrimination in regard to transit planning or service delivery, DMT has established the following process:

- 1) The Complainant(s) must submit a written complaint form to the City of Danville Human Relations (HR) Administrator explaining, as fully as possible, the facts. Alternatively, Complainant(s) may submit a completed complaint form directly to the DMT director. Complaints must be filed no later than 180 days after the date of the alleged discrimination. Within five (5) working days the HR Administrator shall notify the director of DMT in writing that a discrimination complaint has been filed, with a copy to the complainant.
- 2) DMT shall have twenty (20) days from receipt of the notice from the HR Administrator to file a written response, with a response to the complainant if desired. In the case of a written complaint received directly by DMT from the complainant, DMT shall have twenty (20) days from receipt of the complaint to send the complaint along with a written response to the HR Administrator, with a copy to the complainant if desired.
- 3) After receiving the complaint and response, the HR Administrator will review the facts and circumstances pertaining to the alleged discrimination. The HR Administrator will submit a decision to both parties in writing within twenty (20) working days. If the HR Administrator feels the complainant(s) has not submitted sufficient information, he or she may request additional information through a set of interrogatories or recorded interviews before reaching a final decision. In a situation where the HR Administrator decides to



interview the parties involved, reasonable additional time to submit a decision will be allowed.

If the complaint is received in a timely enough manner, and the alleged discrimination occurred in an area where facility or bus cameras can be used to substantiate the incident, copies of the incident will be provided to the HR Administrator.

4) The decision by the HR Administrator shall state whether or not Title VI discrimination has occurred. If discrimination is determined to have occurred, the HR Administrator may also make recommendations for remediation/correction of the discrimination.

5) If the complainant(s) or DMT director disagrees with the decision, either may appeal to the Mayor of the City of Danville within thirty (30) days after the HR Administrator's decision was delivered. The Mayor or his or her designee, after receiving the appeal, shall set a hearing within thirty (30) working days. The Mayor or his or her designee may request additional information or evidence if information submitted at the hearing is not sufficient to render a decision. The Mayor or his or her designee shall render a decision in writing to both parties, stating whether or not Title VI discrimination has occurred, within twenty (20) working days of the end of the hearing. If discrimination is determined to have occurred, the Mayor will require the director of DMT to make remedy.

6) The Complainants may appeal the decision of the Mayor or his or her designee to the Federal Transit Administration (FTA) Civil Rights Office in Chicago thirty (30) days after the decision has been rendered.

APPENDIX C

**Public Non-Discrimination Notices**

Danville Mass Transit

**Title VI Civil Rights  
Complaint Form**

**Section I**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street City State Zip

Telephone Numbers:

Home: \_\_\_\_\_ Work: \_\_\_\_\_ Other: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

Accessible Format Requirements?

Large Print: Yes \_\_\_\_\_ No \_\_\_\_\_ Audio Tape: Yes \_\_\_\_\_ No \_\_\_\_\_

TDD: Yes \_\_\_\_\_ No \_\_\_\_\_ Other: \_\_\_\_\_

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations", and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

**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:

Name: \_\_\_\_\_ Relationship: \_\_\_\_\_

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 \_\_\_\_\_.

What is the basis for your complaint? Race \_\_\_\_\_ Color \_\_\_\_\_ National Origin \_\_\_\_\_  
Disability \_\_\_\_\_

**Section III**

Have you previously filed a Title VI complaint with Danville Mass Transit?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what was your Complaint No? \_\_\_\_\_

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you filed this complaint with any of the following agencies? Yes \_\_\_\_\_ No \_\_\_\_\_

(If you answered yes, who did you file the complaint with?)

Federal Transit Administration: \_\_\_\_\_ U. S. Department of Transportation: \_\_\_\_\_

Illinois Dept. of Transportation: \_\_\_\_\_ Department of Justice: \_\_\_\_\_

Equal Employment  
Opportunity Commission: \_\_\_\_\_

Have you filed a lawsuit regarding this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please provide a copy of the complaint form. (Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the Court.)

**Section IV:**

Complaint is against: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

**Attached is a blank sheet of paper to describe your complaint.  
Please use additional sheets if necessary.**

**Section V:**

Please sign here: \_\_\_\_\_ Date: \_\_\_\_\_

**(Note: We cannot accept your complaint without a signature)**

**Please mail your completed form to:**

**Director  
Danville Mass Transit  
101 N. Jackson St.  
Danville, IL 61832**

**OR**

**Human Relations Administrator  
City of Danville  
17 W. Main Street  
Danville, IL 61832**



## COMPLAINT DESCRIPTION

(You should include specific details such as names dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations.)

Public Non Discrimination Notices in Vehicles, at the Transfer Facility, in the Administrative Offices, and aboard buses used by contracted services:

# Civil Rights Notice



[www.rideDMT.org](http://www.rideDMT.org)  
Call (217) 431-0653 for assistance.

101 N. Jackson St.  
Danville, IL 61832  

Danville Mass Transit operates service without regard to race, color, or national origin in compliance with Title VI of the Civil Rights Act of 1964.

For information or to file a complaint, please contact the Director of Public Transportation at (217) 431-0653, or by writing to Director, DMT, 101 N. Jackson, Danville, IL 61832.

APPENDIX D

## **System-Wide Service Standards and Policies**

### **SERVICE STANDARDS AND POLICIES REQUIRED BY TITLE VI**

#### **Background**

The Federal Transit Administration (FTA) requires that all fixed route providers of public transportation, to comply with the provisions of Title VI, must develop quantitative standards for the following elements of service.

- Vehicle load: ratio of passengers to the number of seats on the bus
- Vehicle headways: amount of time between two buses traveling in the same direction on the same route
- On-time performance: measure of runs completed on schedule
- Service availability: measure of the distribution of routes within the service area.

The FTA also requires that all fixed route providers develop qualitative policies for the following elements of service:

- Vehicle assignment
- Transit amenities.

#### **DMT Quantitative Standards**

**Vehicle Load.** Buses will be assigned to regular routes in a manner that minimizes the need for passengers to stand on DMT's super-medium duty buses. For these buses the ratio of passengers to the number of seats should not exceed 1.00. For services provided by other buses, the vehicle load should not exceed 1.25. Therefore, vehicles load should be as follows for the different types of buses in DMT's fleet:

Number of Seats	Load Factor	Maximum Passengers
24	1.25	30
28	1.25	35
32	1.25	40



**Vehicle Headways.** Vehicle headways should not exceed thirty minutes on DMT's higher-intensity fixed route operations in Danville. Certain routes in areas of lower ridership intensity within Danville can accommodate demand with headways not exceeding one hour. DMT's service outside of Danville (Champaign, Tilton, Westville, Georgetown) may operate headways of several hours between service.

Scheduling and headways involve the consideration of a number of factors including: ridership intensity, traffic patterns and congestion, the location and density of transit-dependent population and activities, land use, and DMT's transportation planning.

**On-time Performance.** A DMT bus is considered on time if it departs a scheduled time point zero minutes early and no more than five (5) minutes late. DMT's on-time performance objective is 90 percent or greater. DMT currently monitors on-time performance through reports from drivers, AVL software, dispatchers, the operations supervisor and the street supervisor. Problem routes may be surveyed to determine more precise performance characteristics and potential remedies. As DMT operates a deviated fixed route system at night, some routes may be subject to wide variations in on-time performance when a large number of deviations are scheduled.

**Service Availability.** DMT has experienced a re-designation from a small urban to a rural system as a result of the decline in population in the 2020 census. With the loss in federal funds for the system, we have applied for grant opportunities to evaluate the route coverage and frequency, and assess changes to be presented to the public for input. Our hope is to cooperatively work with the demand/response provider in this area to provide a combination of fixed-route and D/R services based on this data. Our goal is to provide these updates to the public by the fall of 2024.

### **DMT's Qualitative Standards**

**Vehicle Assignment.** DMT's assignment of vehicles to routes will take into account the following factors:

- Ridership demand
- Availability of buses
- Accessibility of streets and roadways; e.g., width, tightness of turns
- Rotation of buses among high and low density routes to enhance vehicle performance.
- All buses on all routes are equipped with wheelchair ramps or lifts, air conditioning and heating, bus racks, GPS tracking with an app, and a video security system.

**Transit Amenities.** Installation of transit amenities (shelters and landing pads) is based on route and stop characteristics such as route ridership and individual stop boardings, safety, ADA accessibility, input from property owners, new service areas and other factors. With the opening of the Richard Brazda Bus Terminal in 2016, riders now have access to inside waiting areas, restrooms, water fountains, LED bus information, and dedicated berths for loading.