



Title VI Plan

Board Approved, April 2026

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Adopted on: 8/6/14

Adopted by: Illinois Center for Autism Board of Directors

Revised on: 4/23/25

This plan is hereby adopted and signed by:

Executive Name/Title: _____

Executive Signature: _____

Executive Summary

Title VI Plan provides community services to the residents of Madison and St. Clair Illinois. Title VI Plan receives vehicles funded through the 5310-grant program. Title VI Plan is the grantee for the 5310 program. Title VI Plan receives 5310-program vehicles to administer transit services and meet transit needs for its program participants in the 5310-program service area which is Madison and St. Clair Counties.

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA

Title VI Plan operates its programs and services without regard to race, color, national origin and persons with disabilities in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Title VI Plan.

For more information on the Title VI Plan's civil rights program, and the procedures to file a complaint, contact **John Burris**; 618-398-7500, x-205, **email** johnnyb@illinoiscenterforautism.org; or visit our administrative office at **548 S. Ruby Ln., Fairview Heights, IL 62208**. For more information, visit www.illinoiscenterforautism.org.

Complaints may be filed directly with the Illinois Department of Transportation (**IDOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 2300 S Dirksen Parkway, Suite 317, Springfield, IL 62764 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: Front Office 548 S. Ruby Ln., Fairview Heights, IL 62208; Front Entrance 1306 Wabash Av., Belleville, IL 62220; and transit vehicles.

This notice is posted online at www.illinoiscenterforautism.org

Non Discrimination ADA/Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by Title VI Plan including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within **180** calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted Title VI Plan will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Title VI Plan or submitted to the State or Federal authority for guidance.
- (7) Title VI Plan will notify the IDOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at (217) 782-2762; or email at DOT.Complaint@illinois.gov.
- (8) Title VI Plan has 30 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 30 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 30 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) 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 Discrimination violation and that the case will be closed. An 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.

(10) A copy of either the closure letter or LOF must be also be submitted to IDOT within **72** hours of that decision. Letters may be submitted by hardcopy or email.

(11) A complainant dissatisfied with Title VI Plan decision may file a complaint with the Illinois Department of Transportation (**IDOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **IDOT**: ATTN ADA/Title VI Program Coordinator 2300 S Dirksen Parkway, Suite 317, Springfield, IL 62764 **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

(12) A copy of these procedures can be found online at: www.illinoiscenterforautism.org.

Discrimination ADA / Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin <input type="checkbox"/> Disability
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 VI:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

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: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

You may attach any written materials or other information that you think is relevant to your complaint.

Your signature and date are **required** below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Title VI Plan

John Burris

548 S. Ruby Ln., Fairview Heights, IL 62208

618-398-7500, x-205

johnnyb@illinoiscenterforautism.org

A copy of this form can be found online at **www.illinoiscenterforautism.org**

Title VI Investigations, Complaints, and Lawsuits

If no investigations, lawsuits, or complaints were filed select the option below.

Title VI Plan has not had Title VI Discrimination complaints, investigations, or lawsuits in 2024.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
Investigations						
1)						
2)						
Lawsuits						
1)						
2)						
Complaints						
1)						
2)						

Limited English Proficiency Plan

Title VI Plan has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Title VI Plan services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the Title VI Plan’s extent of obligation to provide LEP services, the Title VI Plan undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the Title VI Plan service area who may be served or likely to encounter by Title VI Plan program, activities, or services;

Illinois Center for Autism staff reviewed the number of LEP persons within its service area of Madison and St. Clair Counties. No languages exceeded 5% of the population and only Spanish exceeded 1,000 persons.

2) The frequency with which LEP individuals come in contact with an Title VI Plan services;

Title VI Plan's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for 2024 . Title VI Plan averages 1 contact per month.

3) The nature and importance of the program, activities or services provided by the Title VI Plan to the LEP population.

The Illinois Center for Autism provides transportation services related to its provision of life skills and vocational training to registered clients diagnosed with Autism and other developmental disabilities.

4) The resources available to Title VI Plan and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Title VI Plan provides a statement in Spanish that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision for written translations

Title VI Plan complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Van Schedules
- (5) Route Changes
- (6) Public Hearings

1) Title VI Plan provides language assistance services through the below methods:

- Instructions are provided to customer service staff and other Title VI Plan staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
- LEP is addressed as part of communication needs with prospective clients, upon intake, and

reviewed during annual service plan meetings. Strategies to meet LEP needs are developed with the client.

2) Title VI Plan has a process to ensure the competency of interpreters and translation service through the following methods:

Title VI Plan will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and Spanish. Title VI Plan will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. Title VI Plan will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator. Title VI Plan will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

3) Title VI Plan provides notice to LEP persons about the availability of language assistance through the following methods:

- Agency websites
- Customer service lines
- Availability of language assistance is reviewed with prospective clients, upon intake, and at annual service plan meetings. Strategies to meet LEP needs are developed with the client.

4) Title VI Plan monitors, evaluates and updates the LEP plan through the following process:

Title VI Plan will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. Title VI Plan will make changes to the language assistance plan based on feedback received. Title VI Plan may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, Title VI Plan may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. Title VI Plan will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5) All Illinois Center for Autism employees are trained to modify communication methods to meet the need of all individual served. Title VI Plan trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. Title VI Plan will implement processes for training of staff through the following procedures:

Title VI Plan will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. Title VI Plan will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. Title VI Plan will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-

training or new training sessions to keep up to date on their responsibilities to LEP persons. Title VI Plan will implement LEP training to be provided for agency staff. Title VI Plan staff training for LEP to include:

- A summary of the Title VI Plan responsibilities under the DOT LEP Guidance;
- A summary of the Title VI Plan language assistance plan;
- A summary of the number and proportion of LEP persons in the Title VI Plan service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the Title VI Plan cultural sensitivity policies and practices.

Public Participation Plan

Title VI Plan is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

As an agency receiving federal financial assistance, Title VI Plan made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to IDOT CRO.

- Posted the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Pick up and drop off stations
 - Lobby of agency
- Schedule changes due to weather or other unforeseen circumstances are posted on Facebook and www.illinoiscenterforautism.org.
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures
- Agency programs and individual needs are reviewed with prospective clients during tours, at intake, and annually during service plan meetings. Strategies to meet individual needs are developed with the client.

Title VI Plan will make the following community outreach efforts for the upcoming year:

- Post the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Pick up and drop off stations
 - Lobby of agency
- Schedule changes due to weather or other unforeseen circumstances are posted on Facebook and www.illinoiscenterforautism.org.
- Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.

- ☒ Agency programs and individual needs are reviewed with prospective clients during tours, at intake, and annually during service plan meetings. Strategies to meet individual needs are developed with the client.

Non-elected Committees Membership

- ☒ Title VI Plan does **not** select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

Title VI Plan, as a grantee of federal funded vehicle assets from 5310 grant program, does not have sub-recipients to which they would monitor Title VI compliance.

Board Approval for the Title VI Plan

Date of Board Approval: