Policy Statement

DeKalb County Government
Statement of Policy on Providing Non-Discriminatory Services per
Title VI of the Civil Rights Act of 1964
(Board Adopted: 03/16/2022)

DeKalb County Government (the "County") is committed to a policy of non-discrimination in the conduct of its business, including its Title VI of the Civil Rights Act of 1964 ("Title VI") responsibilities - the delivery of equitable and accessible services. The County recognizes its responsibilities to the communities in which it operates. It is the County's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, national origin, or any other protected class as amended from time to time, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits or any other program or activity for which DeKalb County receives Federal financial assistance. Toward this end, it is the County's objective to:

A. Ensure that the level and quality of service is provided without regard to race, color, national origin, or any other protected class as amended from time to time;
B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
C. Promote the full and fair participation of all affected populations in service provision decision making;
D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
E. Ensure meaningful access to programs and activities by persons with limited English proficiency.

The responsibility for carrying out the County's commitment to this Program has been delegated to the County Administrator by the DeKalb County Board. The County Administrator is responsible for the day-to-day operations of this Program and will receive and investigate Title VI complaints which come through the complaint procedure. However, all managers, supervisors, employees, and transit operators share in the responsibility for making the County's Title VI Program a success. The County Administrator shall be responsible for maintaining all records relating to this Policy including, but not limited to, this Title VI Policy, copies of all Title VI complaints or lawsuits and related documentation, all records of correspondence to and from Complainants, and Title VI investigations.

Additional information concerning the County's Title VI obligations and the complaint procedure can be obtained by contacting the County Administrator's Office by telephone at (815) 895-1630, via email at administration@dekalbcounty.org, or via mail at DeKalb County Administrator, 200 N. Main Street, Suite 280, Sycamore, Illinois 60178-1431.

Title VI Notice to the Public

Non-Discrimination Rights Under Title VI of the Civil Rights Act of 1964

DeKalb County Government (the "County") operates its programs and services without regard to race, color, national origin, or any other protected class as amended from time to time in accordance with Title VI of the 1964 Civil Rights Act ("Title VI"). Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the County. Any such complaint must be in writing and filed with the County within 180 days following the date of the alleged discriminatory occurrence. For information on the County's non-discrimination obligations or how to file a complaint, please contact the DeKalb County Administrator, who is the designated Title VI Officer, by any of the methods listed below.

DeKalb County Administration Department
200 N. Main Street. Suite 280
Sycamore, Illinois 60178-1431

815-895-1630 (Phone)
815-895-7129 (Fax)
administration@dekalbcounty.org (email)
www.dekalbcounty.org (website)

If this information is needed in another language, please contact the DeKalb County Administrator *via the above contact information.*

Posting Locations

The Title VI public notice attachment shall be posted in the DeKalb County Legislative Center, 200 N. Main Street, Sycamore, Illinois 60178-1431. Information relating to DeKalb County's non-discrimination obligation can also be obtained from DeKalb County's website at www.dekalbcounty.org.

Title VI Complaint Procedures

TITLE VI COMPLAINT PROCEDURES

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color, national origin, or any other protected class as amended from time to time, under the County's programs or related benefits, you may file a complaint with the DeKalb County Administrator by telephone at (815) 895-1630, via email at administration@dekalbcounty.org, or via mail at 200 N. Main Street, Suite 280, Sycamore, Illinois 60178-1431. We encourage you to make your complaint in writing.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The County Administrator will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigating officer will:

- Identify and review all relevant documents, practices, and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity; or anyone with relevant information.

Upon completion of the investigation, the County Administrator will complete a final report for the DeKalb County Board. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial steps. The investigation process and final report should take no longer than twenty-five (25) business days to complete. If no violation is found and the Complainant wishes to appeal the decision, he or she may appeal directly to the DeKalb County Board at 200 N. Main Street, Suite 280, Sycamore, Illinois 60178-1431.

Complaints may also be filed with the Federal Transit Administration's Office of Civil Rights, no later than 180 days after the date of the alleged discrimination via the following contact information:

Federal Transit Administration
Office of Civil Rights
200 West Adams Street, Suite 320
Chicago, Illinois 60606
Phone: (312) 353-3770

The DeKalb County Administrator shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by the County in response to the complaint. Should the County receive a Title VI complaint in the form of a formal charge or lawsuit, the DeKalb County State's Attorney shall be responsible for the investigation and maintaining a log as described herein.

Title VI Complaint Form

DeKalb County Government
Title VI of the Civil Rights Act of 1964
Discrimination Complaint Form

DeKalb County Government (the "County") is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, or any other protected class as amended from time to time, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the DeKalb County Administrator by telephone at (815) 895-1630, via email at administration@dekalbcounty.org, or via mail at DeKalb County Administrator, 200 N. Main Street, Suite 280, Sycamore, Illinois 60178-1431. This completed form must be returned to the DeKalb County Administrator via any of the contact methods indicated above.

Your Name: _____

Street Address: _____

Phone: _____ Alternate Phone: _____

Person discriminated against (if someone other than complainant):

Name(s): _____

Street Address, City, State & Zip Code: _____

Which of the following best describes the reason for the alleged discrimination that took place?

☐ Race

☐ Color

☐ National Origin (Limited English Proficiency)

☐ Other Protected Class (please list): _____

Date of Incident: _____

Please describe the alleged discrimination incident (attach additional pages if needed):

_____

_____

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Have you filed a complaint with any other federal, state or local agencies? ☐ Yes ☐ No

If yes, list agency/agencies and contact information below:

Agency:_____ Contact Name:_____

Street Address, City, State & Zip Code:_____

Agency:_____ Contact Name:_____

Street Address, City, State & Zip Code:_____

I affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

_____

Complainant's Signature Date

Print or type name of Complainant: _____

For County Use Only

Date Received: _____ Received By: _____

Transit-Related Title VI Investigations

"All FTA recipients are required to prepare and maintain a list of complaints alleging discrimination on the bases of race, color, or national origin. DeKalb County has not received any complaints in the timeframe preceding this program"

	Complaint Date	Summary	Status	Action(s) Taken
Complaints:				
1.				
Investigations:				
1.				
Lawsuits:				
1.				

Public Participation

Community outreach is a requirement of Title VI recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected populations, the public involvement process, and the resources of the recipient. As stated above, the Title VI Policy will be located on DeKalb County's website and will be available for review at the DeKalb County Administrator's Office. Additionally, all DeKalb County Board meetings are open to the public and follow the Illinois Open Meetings Act.

Expanded Public Participation Plan

DeKalb County places special emphasis on connecting with and informing the public in the local decision-making process. All meetings of the County Board and associated committees, the decision-making authorities for the County, follow the provisions of the Illinois Open Meetings Act, are open to the public, and provide dedicated time for public comment.

In the occurrence of a special meeting or event held in the course of conducting public outreach, the County will make every effort to receive and consider the viewpoints and minority, low-income, and limited English proficient (LEP) populations when appropriate. At a minimum, the following list of effective practices will be considered during the development of a specific public outreach program or event.

- Scheduling meetings at times and locations that are convenient and accessible for the effected communities;
- Employing different meeting sizes and formats;
- Coordinating with community- and faith-based organizations, education institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected communities;
- Considering radio, television, or newspapers ads on stations and in publications that serve LEP populations; and
- Providing opportunities for public participation through means other than written communications, such as personal interviews or the use of audio or video recording devices to capture oral comments.

Language Assistance Program

LIMITED ENGLISH PROFICIENCY POLICY STATEMENT AND AVAILABLE RESOURCES

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that certain federal grant recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). To that end, the County provides translation and interpretation services free of charge upon request by calling (815) 895-1630 or by contacting the DeKalb County Administrator via email at administration@dekalbcounty.org, or via mail at 200 N. Main Street, Suite 280, Sycamore, Illinois 60178-1431.

Expanded Language Assistance Program Example

This Language Assistance Program has been prepared to address DeKalb County's responsibilities as recipients of federal financial assistance as they relate to the needs of individuals with limited English language skills. The County, in coordination with contracted service providers, have jointly developed this plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access county services.

As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

Four Factor Analysis

In order to determine the County's extent of obligation to provide LEP services, a U.S. Department of Transportation four factor LEP analysis was conducted which considers the following:

1. The number or proportion of LEP persons eligible who may be served or likely to encounter a County program, activity, or service;
2. the frequency with which LEP individuals come in contact with County services;
3. the nature and importance of the program, activity or service provided by County to the LEP population; and
4. the resources available and overall costs to provide LEP assistance.

A brief description of these considerations is provided in the following section.

1. Service Area Demography

According to the 2015-2019 American Community Survey 5-year estimates, of the estimated 98,357 DeKalb County residents ages 5 and over, 3,907 (3.98%) residents report as LEP, or as speaking English less than "very well". The largest non-English speaking language group in the

County is Spanish, constituting 2,577 (2.62%) residents. **Table X** identifies common language groups within the County and their LEP composition.

	DeKalb County	
Category	**Total**	**%**
Population ages 5+	98,357	100%
Speak Only English	86,650	88.1%
Speaks another Language	11,707	11.9%
Spanish	7,067	7.19%
Speaks English Less than "Very Well"	2,577	2.62%
Other Indo-European	2,063	2.10%
Speaks English Less than "Very Well"	340	0.35%
Asian and Pacific Islander	1,510	1.54%
Speaks English Less than "Very Well"	626	0.64%
Other Languages	1,067	1.08%
Speaks English Less than "Very Well"	364	0.37%

2. Frequency of Contact

The County assess the frequency of contact with LEP residents through direct requests for language assistance and from direct experiences reported at the discretion of County service providers. To date, the County has received 6 requests for language assistance. Voluntary Action Center (VAC), the contracted public transportation service provider for the County, frequently surveys frontline staff to track the frequency of interactions with LEP residents. Generally, VAC staff respond to interacting with LEP residents between 0 and 6 times per year. The most common language request for assistance is Spanish.

3. Program Importance

Many of the federally funded programs and services provided by the County are vital to the basic well-being of County residents. Similar to assistance provided to seniors, persons with a disability, or low-income individuals, LEP residents are entitled to reasonable accommodations for access.

4. Resources Available

An assessment of available resources to provide LEP assistance, including as needed interpretation and translation services, concluded that it is feasible for the County to provide these services free of charge upon request.

Language Assistance Plan

Based on the results of the Four-Factor Analysis performed in the previous section, the County has developed the following criteria for assisting LEP residents.

Identification of LEP Assistance Needed

The following tools are intended to identify language assistance needs when preparing programs, services, and events, and to identify the language needed for assistance.

- Examine records requests for language assistance from previous meetings and events to anticipate the need for assistance at upcoming meetings;
- Have Census Bureau Language Identification Flashcards available at all meetings and other high-frequency interaction points, such as public transportation facilities; and
- Continue tracking of staff and/or contractor LEP assistance interactions to determine if modifications to the LAP are needed.

Language Assistance Measures

Based on the generally low population and interaction frequency of LEP residents, the County will implement the following measures as minimum criteria to guide future interactions.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information regarding County programs and services;
- Provide interpretation and translation services free-of-charge at meetings with prior notification;
- Provide translated versions of vital documents, determined at the discretion of the department or program, upon request; and
- Provide "Spanish a plus" on job postings and flyers for positions with a high incidence of LEP interactions.
- VAC makes efforts to employ Spanish speaking dispatch staff who also reads and writes Spanish.
- VAC subscribes to an internationally known company "Language Line Solutions" which specializes in translation services both oral and written. Language Line Solutions interpreters are available in more that 240 languages and American Sign Language 24 hours a day, 7 days a week.

Staff Training

During employee orientation and subsequent employee trainings, information relative to the provisions of Title VI, inclusive of this plan, and the County's expectations of employees to perform their duties accordingly will be reviewed and discussed. Training topics include:

- Understanding the Title VI policy and other LEP responsibilities;
- What language assistance services are offered;
- Use of Language Identification Flashcards and translation services;
- Documentation of language assistance requests; and
- How to handle a Title VI and/or LEP complaint.

Outreach Techniques

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. Interpreters will be available as needed.

Monitoring and Updating the Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the County will follow the required three-year update cycle of the Title VI Program or if a significant increase in LEP assistance requests occur. LAP updates will examine the following:

- The number of documented LEP person interactions encountered annually;
- How the needs of LEP persons have been addressed;
- Determination of the current LEP population in the County;
- Determination as to whether the need for translation services has changed;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether County financial resources are sufficient to fund the language assistance resources needed;
- Determine if the County has fully complied with the provisions of this LAP; and
- Examine whether complaints have been received concerning the County's failure to meet the needs of LEP residents.

Dissemination of the LAP

A link to the Title VI Program, inclusive of this Language Assistance Plan, is to be included on the County website at www.DeKalbCounty.org and on County contractor websites when appropriate. Alternatively, any person or agency may request a paper copy of the plan via telephone, fax, mail, or in person at no cost. Translated versions of this plan will be made available upon request.

Questions or comments regarding this LAP may be submitted to the DeKalb County Administrators office at:

200 N. Main Street, Suite 280
Sycamore, Illinois 60178-1431
(815) 895-1630
administration@dekalbcounty.org

Table of Membership of transit-related non-elected committees and councils

N/A

Monitoring Subrecipient Compliance

SUBCONTRACTORS AND VENDORS

All subcontractors and vendors who receive payments from DeKalb County where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts with such subcontractors and vendors shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

Equity Analysis for new Facilities

N/A

Adopting Board Action/Resolution

Policy and Program will adopted by the County Board. A copy of the signed action or meeting minutes when adopted in the Program Plan will appear as an appendix.