

# LIMITED ENGLISH PROFICIENCY PLAN

For the Rockford Metropolitan  
Planning Organization



November 16th, 2018 Draft Version

# Limited English Proficiency Plan

For the Rockford Metropolitan Planning Organization  
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This report was prepared in cooperation with the U.S. Department of Transportation, Federal Highway Administration, Federal Transit Administration, and the Illinois Department of Transportation. The contents, views, policies, and conclusions expressed in this report are not necessarily those of the above agencies.

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A vertical image on the left side of the page shows a brick building with a dark awning and several bicycles parked in front. The image is partially obscured by the green header and footer bars.

## Policy Statement

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide 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, and;

## Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local governments and agencies, such as the Rockford Metropolitan Planning Organization (MPO), private and non-profit entities, and subrecipients.

## Plan Summary

The Rockford Metropolitan Planning Organization (MPO), has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs. 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, how staff is trained, how to notify LEP persons

that assistance is available, and information for future plan updates. In developing the plan, the MPO 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 three-county area to be served or likely to encounter an MPO program, activity, or service;
2. The frequency with which LEP individuals come in contact with an MPO program;
3. The nature and importance of the program, activity or service provided by the MPO to the LEP population; and
4. The resources available to the MPO and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## Four Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity, or service.

The MPO examined the US Census Bureau's 2011-2015 American Community Survey data and was able to determine that approximately 13.2% of the MPO Region, or 49,153 persons, speak a language other than English at home. However, only approximately 7.92% of the MPO Region, or 29,476 persons, speak a language other than English at home and are identified as speaking English less than 'very well'. Spanish or Spanish Creole is the most common language

2. The frequency with which LEP individuals come in contact with an MPO program, activity, or service.

The MPO assesses the frequency at which staff has or could possibly have contact with LEP persons. To date, the MPO has not had a request for interpreters or translated MPO documents. With the implementation of this LEP Plan, the MPO will document all phone inquiries from LEP persons and/or requiring translation. In addition, the MPO will document public meeting attendees requiring translation or the use of "I Speak Cards" as discussed later in this document.

3. The nature and importance of the program, activity, or service provided by the MPO to LEP community.

In the MPO region, there are concentrations of LEP individuals in places that are categorized as having high concentrations of low income or working poor individuals. Of the services provided by or related to the MPO, this group of individuals has a high degree of reliance upon and need for public transit. The Rockford Mass Transit District (RMTD), the primary local provider of public transportation has a wide number of materials available to aid the LEP population, particularly schedule books and rail cards available in Spanish, Braille, and large print. Additionally, RMTD will provide Spanish translation and sign language interpreters at

all public hearings upon request if notified up to 48 hours prior to the scheduled hearing. If RMTD is not notified and an interpreter is needed, RMTD will provide a translated transcript of the public hearing upon request within seven (7) to fourteen (14) days.

4. The resources available to the MPO and overall costs.

The MPO assessed its available resources that could be used for providing LEP assistance, including, how much a professional interpreter and translation service would cost; current market rates suggest that translations cost approximately \$0.10 per word, which documents should be translated, taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts; such as La Voz Latina and SWIFTT, examining which financial and in-kind sources could be used to provide assistance, and what level of staff training is needed. While identifying what staff capabilities are readily available, it was determined that MPO staff may be able to provide informal interpretations in Spanish.

## How to Identify a Person in Need of Language Assistance

After analyzing the four factors, the MPO developed the plan outlined in the following section for assisting persons of limited English proficiency.

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- When MPO sponsored workshops or conferences are held, set up a sign-up sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the MPO office reception area.
- Place Notice of Available Language Assistance and Title VI Notice to the Public in the foyer of the MPO office space.

## Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. The Census Bureau's "I Speak Cards" are to be located at the MPO reception area at all times in order to aid this process.

If possible, staff should first use an online service such as Google Translate (<http://translate.google.com/>) or a similar service to aid in the interpretation of services on a one on one basis.



If this proves infeasible or if a formal interpretation is requested, staff should use the telephone interpreter service, Language Line, available from <http://www.language.com/>. On the Language Line home page the staff will select the “Need an Interpreter Now” link and follow the directions to receive an access code. The MPO’s purchasing card number as a method of payment must be provided before an authorization number is given and the staff person is connected with a translator. In the event that the MPO requires translation in-person or at a meeting, local services are to be prioritized over ones from outside the region, and will be evaluated at the time of such need.

## MPO Staff Training

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI Policy and LEP responsibilities;
- Use of LEP “I Speak Cards”;
- How to use the Google Translate service;
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on the MPO’s LEP program responsibilities and their obligation to provide language assistance.

## Outreach Techniques

There are two main outreach techniques that should be utilized by staff:

- If staff knows they will be presenting a topic that could affect LEP persons or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, have meeting notices, fliers, advertisements, and agendas printed in an alternative language, based on known LEP population in the area.
- Include in the following statement when running a general public meeting notice or when sending emails to the MPO mailing list: “Persons who require special accommodations under the Americans with Disabilities Act or person who require translation services (free of charge) should contact the MPO at (815)-319-4180 at least 2 working days before the need for such services or accommodations.”



## Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components, such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the MPO area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified MPO programs? Are there other programs that should be included?
- Have the MPO's available resources, such as technology, staff, and financial costs changed?
- Has the MPO fulfilled the goals of the LEP Plan?
- Were any complaints received?

## Dissemination of the MPO Limited English Proficiency Plan

The MPO will post the LEP Plan on its website at [www.rmapil.com](http://www.rmapil.com). Any person, including social service, non-profit, law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, local libraries offer free internet access. Copies of the LEP Plan and any of the MPO's documents will be provided, on request, to any person(s) requesting the document via electronic or hard copy. LEP persons may obtain copies/translations of any of the MPO's documents upon request.

Any questions or comments regarding this plan should be directed to the MPO Title VI Coordinator, by calling (815)-319-4180.

## Notice to MPO Grant and Program Subrecipients

All programs and operations of entities that receive assistance from the federal government including the MPO and its subrecipients must comply to the fullest reasonable extent for improving access to services for LEP persons. Subrecipients are encouraged to have in place written policies on the provision of interpreter and translation services.

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# Appendix A - Population Data

B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe:  
2011-2015 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Boone County, Illinois		Ogle County, Illinois		Winnebago County, Illinois		3 County Area	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Percentage
Total:	50,524	+/-99	49,650	+/-53	272,105	+/-40	372,279	100%
Speak only English	41,295	+/-923	45,739	+/-415	236,092	+/-1,410	323,126	86.80%
Spanish or Spanish Creole:	7,488	+/-715	3,181	+/-358	24,066	+/-856	34,735	9.33%
Speak English "very well"	4,295	+/-656	1,714	+/-360	14,902	+/-930	20,911	5.62%
Speak English less than "very well"	3,193	+/-596	1,467	+/-294	9,164	+/-655	13,824	3.71%
French (incl. Patois, Cajun):	0	+/-26	40	+/-30	449	+/-156	489	0.13%
Speak English "very well"	0	+/-26	40	+/-30	367	+/-133	407	0.11%
Speak English less than "very well"	0	+/-26	0	+/-26	82	+/-62	82	0.02%
French Creole:	27	+/-44	0	+/-26	0	+/-26	27	0.01%
Speak English "very well"	27	+/-44	0	+/-26	0	+/-26	27	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Italian:	58	+/-77	120	+/-138	650	+/-214	828	0.22%
Speak English "very well"	47	+/-60	113	+/-132	349	+/-116	509	0.14%
Speak English less than "very well"	11	+/-18	7	+/-13	301	+/-186	319	0.09%
Portuguese or Portuguese Creole:	0	+/-26	15	+/-16	23	+/-27	38	0.01%
Speak English "very well"	0	+/-26	15	+/-16	23	+/-27	38	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
German:	182	+/-120	49	+/-38	652	+/-189	883	0.24%
Speak English "very well"	175	+/-120	48	+/-38	444	+/-151	667	0.18%
Speak English less than "very well"	7	+/-11	1	+/-3	208	+/-125	216	0.06%
Yiddish:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Other West Germanic languages:	25	+/-40	31	+/-25	3	+/-5	59	0.02%
Speak English "very well"	25	+/-40	21	+/-21	3	+/-5	49	0.01%
Speak English less than "very well"	0	+/-26	10	+/-14	0	+/-26	10	0.00%
Scandinavian languages:	50	+/-49	0	+/-26	215	+/-90	265	0.07%
Speak English "very well"	50	+/-49	0	+/-26	195	+/-84	245	0.07%
Speak English less than "very well"	0	+/-26	0	+/-26	20	+/-18	20	0.01%
Greek:	0	+/-26	24	+/-20	123	+/-90	147	0.04%
Speak English "very well"	0	+/-26	24	+/-20	98	+/-87	122	0.03%
Speak English less than "very well"	0	+/-26	0	+/-26	25	+/-19	25	0.01%
Russian:	16	+/-25	24	+/-39	396	+/-315	436	0.12%
Speak English "very well"	16	+/-25	24	+/-39	266	+/-279	306	0.08%
Speak English less than "very well"	0	+/-26	0	+/-26	130	+/-134	130	0.03%
Polish:	241	+/-159	101	+/-55	1,031	+/-418	1,373	0.37%
Speak English "very well"	176	+/-118	74	+/-49	586	+/-211	836	0.22%
Speak English less than "very well"	65	+/-58	27	+/-19	445	+/-235	537	0.14%
Serbo-Croatian:	69	+/-72	15	+/-19	1,351	+/-446	1,435	0.39%
Speak English "very well"	55	+/-53	15	+/-19	688	+/-259	758	0.20%
Speak English less than "very well"	14	+/-22	0	+/-26	663	+/-268	677	0.18%
Other Slavic languages:	323	+/-383	63	+/-61	71	+/-45	457	0.12%
Speak English "very well"	307	+/-382	53	+/-55	43	+/-33	403	0.11%
Speak English less than "very well"	16	+/-25	10	+/-14	28	+/-27	54	0.01%
Armenian:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Persian:	24	+/-38	0	+/-26	51	+/-77	75	0.02%

Speak English "very well"	24	+/-38	0	+/-26	51	+/-77	75	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Gujarati:	0	+/-26	0	+/-26	580	+/-399	580	0.16%
Speak English "very well"	0	+/-26	0	+/-26	331	+/-233	331	0.09%
Speak English less than "very well"	0	+/-26	0	+/-26	249	+/-177	249	0.07%
Hindi:	0	+/-26	0	+/-26	194	+/-128	194	0.05%
Speak English "very well"	0	+/-26	0	+/-26	165	+/-114	165	0.04%
Speak English less than "very well"	0	+/-26	0	+/-26	29	+/-28	29	0.01%
Urdu:	0	+/-26	0	+/-26	207	+/-140	207	0.06%
Speak English "very well"	0	+/-26	0	+/-26	152	+/-93	152	0.04%
Speak English less than "very well"	0	+/-26	0	+/-26	55	+/-58	55	0.01%
Other Indic languages:	0	+/-26	0	+/-26	98	+/-97	98	0.03%
Speak English "very well"	0	+/-26	0	+/-26	51	+/-49	51	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	47	+/-53	47	0.01%
Other Indo-European languages:	194	+/-291	132	+/-180	415	+/-181	741	0.20%
Speak English "very well"	39	+/-60	99	+/-135	284	+/-125	422	0.11%
Speak English less than "very well"	155	+/-232	33	+/-46	131	+/-109	319	0.09%
Chinese:	158	+/-107	4	+/-7	644	+/-270	806	0.22%
Speak English "very well"	73	+/-66	4	+/-7	189	+/-95	266	0.07%
Speak English less than "very well"	85	+/-60	0	+/-26	455	+/-240	540	0.15%
Japanese:	24	+/-26	0	+/-26	88	+/-67	112	0.03%
Speak English "very well"	24	+/-26	0	+/-26	49	+/-38	73	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	39	+/-35	39	0.01%
Korean:	114	+/-118	0	+/-26	305	+/-172	419	0.11%
Speak English "very well"	79	+/-76	0	+/-26	86	+/-86	165	0.04%
Speak English less than "very well"	35	+/-51	0	+/-26	219	+/-120	254	0.07%
Mon-Khmer, Cambodian:	1	+/-2	0	+/-26	23	+/-40	24	0.01%
Speak English "very well"	0	+/-26	0	+/-26	5	+/-8	5	0.00%
Speak English less than "very well"	1	+/-2	0	+/-26	18	+/-38	19	0.01%
Hmong:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Thai:	0	+/-26	0	+/-26	31	+/-28	31	0.01%
Speak English "very well"	0	+/-26	0	+/-26	16	+/-18	16	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	15	+/-23	15	0.00%
Laotian:	0	+/-26	0	+/-26	1,135	+/-342	1,135	0.30%
Speak English "very well"	0	+/-26	0	+/-26	598	+/-240	598	0.16%
Speak English less than "very well"	0	+/-26	0	+/-26	537	+/-164	537	0.14%
Vietnamese:	0	+/-26	10	+/-13	531	+/-199	541	0.15%
Speak English "very well"	0	+/-26	5	+/-7	191	+/-100	196	0.05%
Speak English less than "very well"	0	+/-26	5	+/-7	340	+/-144	345	0.09%
Other Asian languages:	80	+/-96	0	+/-26	890	+/-283	970	0.26%
Speak English "very well"	19	+/-31	0	+/-26	432	+/-178	451	0.12%
Speak English less than "very well"	61	+/-90	0	+/-26	458	+/-228	519	0.14%
Tagalog:	123	+/-124	53	+/-70	556	+/-169	732	0.20%
Speak English "very well"	89	+/-117	53	+/-70	333	+/-117	475	0.13%
Speak English less than "very well"	34	+/-42	0	+/-26	223	+/-112	257	0.07%
Other Pacific Island languages:	0	+/-26	3	+/-4	101	+/-92	104	0.03%
Speak English "very well"	0	+/-26	3	+/-4	76	+/-80	79	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	25	+/-28	25	0.01%
Navajo:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Other Native North American	0	+/-26	0	+/-26	104	+/-130	104	0.03%
Speak English "very well"	0	+/-26	0	+/-26	104	+/-130	104	0.03%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Hungarian:	0	+/-26	0	+/-26	10	+/-14	10	0.00%
Speak English "very well"	0	+/-26	0	+/-26	10	+/-14	10	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Arabic:	32	+/-42	46	+/-65	657	+/-347	735	0.20%
Speak English "very well"	24	+/-40	46	+/-65	241	+/-160	311	0.08%
Speak English less than "very well"	8	+/-16	0	+/-26	416	+/-243	424	0.11%
Hebrew:	0	+/-26	0	+/-26	25	+/-36	25	0.01%

Speak English "very well"	0	+/-26	0	+/-26	25	+/-36	25	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
African languages:	0	+/-26	0	+/-26	338	+/-178	338	0.09%
Speak English "very well"	0	+/-26	0	+/-26	228	+/-135	228	0.06%
Speak English less than "very well"	0	+/-26	0	+/-26	110	+/-78	110	0.03%
Other and unspecified languages:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

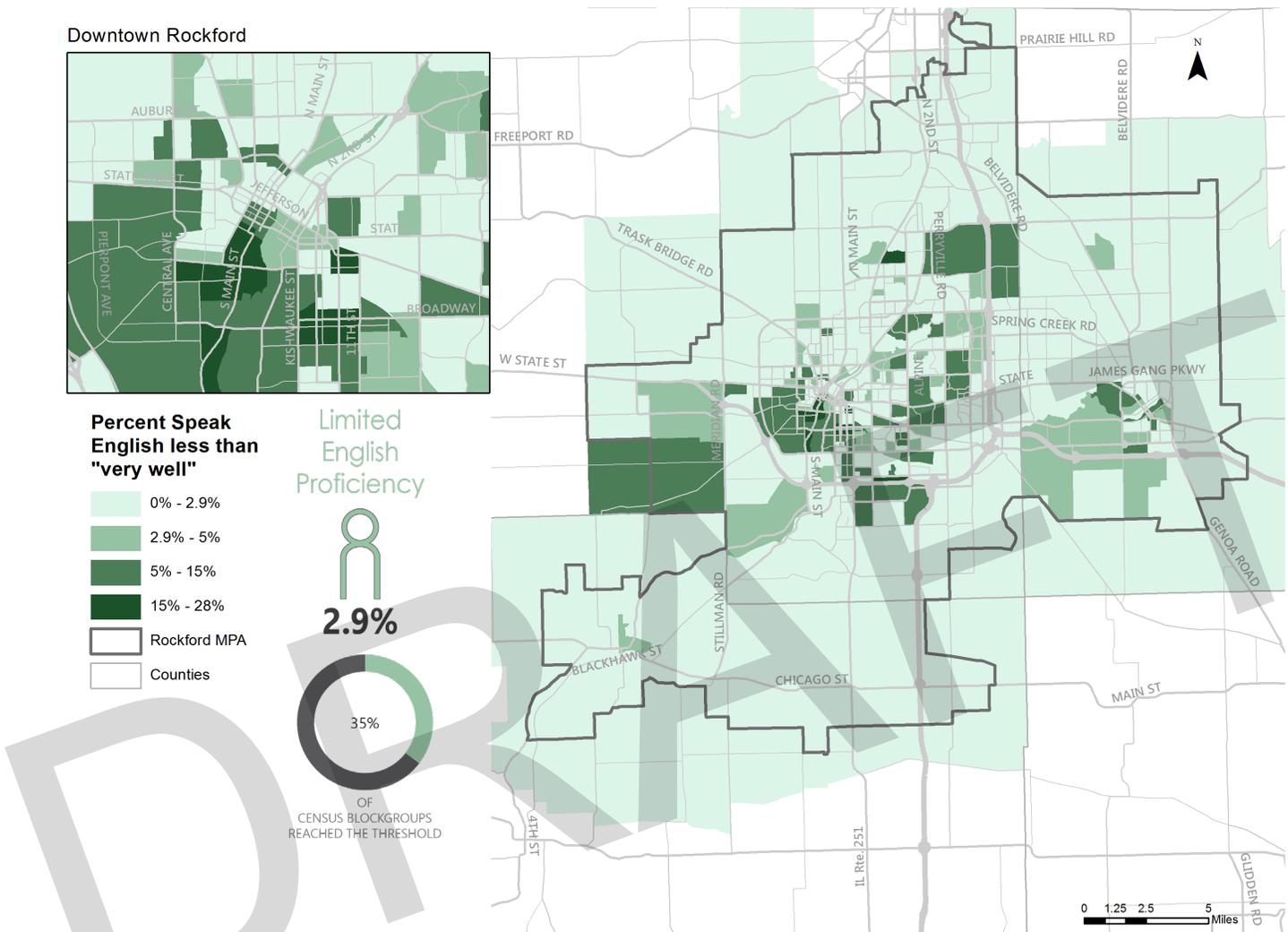
Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

#### Explanation of Symbols:

1. An '\*\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '\*\*\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

# Appendix B - Limited English Proficiency Threshold Map



As part of the Title VI and Environmental Justice Considerations document, a demographic baseline and thresholds for different Traditionally Underserved Populations (TUP) were established. A threshold represents the overall concentration of a population across the entire metropolitan planning area. To calculate the threshold, a regional average for each population category such as limited English proficiency was calculated. It was then applied to all census block groups in the planning area to identify areas with higher than average targeted population densities.

The threshold for limited English proficiency (households in which no one over the age of 14 understands English well) is 2.9%. In the above map, block groups that are shaded darker show a higher concentration of households with Limited English Proficiency. A more in-depth analysis of impacts and environmental justice can be found in the Title VI and Environmental Justice Considerations document, Environmental Justice Assessment section.

# Appendix C - MPO Discrimination Complaint Procedure

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## 1. Alignment

Region 1 Planning Council (R1PC) and its staff are responsible for operating within the parameters set forth by prevailing law and professional ethics.

## 2. Objective

The purpose of this policy is to establish a process for reporting complaints, investigating for violation of Title VI, and to determining appropriate relief should a violation be found.

## 3. Standard

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color, and national origin for programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, R1PC has adopted the following complaint procedure.

## 4. Procedure

a. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by R1PC's administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by R1PC shall be referred immediately to the Region 1 Planning Council Title VI Coordinator.

Written Complaints shall be sent to:

Region 1 Planning Council  
Attention: Title VI Coordinator  
313 N. Main Street  
Rockford, IL 61101

b. Verbal and non-written complaints by R1PC shall be resolved informally by the R1PC Title VI Coordinator. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the Complainant shall be permitted to do so, and the complaint shall follow the process for written complaints.

c. The R1PC Title VI Coordinator will advise the R1PC Executive Director within ten (10) calendar days of receipt of the complaint(s). The following information will be included in every notification to the Executive Director (or designated human resource manager):

- a. Name, address, and phone number of the complainant
- b. Name, address, and phone number of R1PC
- c. Basis of complaint
- d. Date of alleged discriminatory act(s)
- e. Date complaint received by R1PC
- f. A statement of the complaint
- g. Other agencies (local, state, or Federal) where the complaint has been filed
- h. An explanation of the actions R1PC has taken or proposed to resolve the allegation(s) raised in the complaint

- d. Within thirty (30) calendar days of receipt of the complaint(s), the R1PC Title VI Coordinator will acknowledge receipt of the complaint(s), inform the complainant of action taken or proposed action to process the complaint(s), and advise the complainant of other avenues of redress available, such as the Illinois Department of Transportation's (IDOT) Equal Opportunity Office (EOO).
- e. Within one-hundred twenty (120) calendar days of receipt of the complaint(s), the R1PC Title VI Coordinator will conduct and complete a review of the complaint(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the R1PC Executive Director (or designee).
- f. Within one-hundred fifty (150) calendar days of receipt of the complaint(s), the R1PC Executive Director (or designee) will notify the complainant in writing of the final decision reached. The notification will advise the complainant of his or her right to file a formal complaint with IDOT's EOO if they are dissatisfied with the final decision rendered by R1PC. The R1PC Title VI Coordinator will also provide the governing board with a copy of this decision and summary of findings.
- g. The R1PC Title VI Coordinator will maintain a log of all verbal and non-written complaints received. The log will include the following information:
- a. Name of complainant
  - b. Name of respondent
  - c. Basis of complaint
  - d. Date complaint received
  - e. Explanation of the actions the MPO has taken or proposed to resolve the issue raised in the complaint

A person may also file a complain directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC, 2059.

## **5. Responsibility and Accountability**

All employees and representatives of Region 1 Planning Council are responsible for abiding by Title VI as applicable to both internal and external parties. All R1PC employees with supervisory responsibilities are accountable or ensuring employees access to this process.

## **6. Review Schedule**

The document is recommended for review no less than every two years. The Executive Director (or human resources designee) will ensure this policy is maintained and approved by the applicable authority accordingly.

## **7. Prevailing Authority**

Title VI of the Civil Rights Act of 1964.

## **8. Internal Cross-Reference**

Standard Operating Procedure: Policy & Procedure System  
Personnel Policy: Anti-Discrimination and Harassment

## **9. Attachments and Forms**

None

# Appendix D - MPO Discrimination Complaint Form

## Rockford Metropolitan Agency for Planning Title VI and Related Statutes Discrimination Complaint Form

Name		Telephone (home)	Telephone (work)	
Address:		City, State, Zip Code		
Name of MPO Staff Person that You Believe Discriminated Against You:				
Address:		City, State, ZIP Code		
Date of Alleged Incident:				
Cause of Discrimination:				
<input type="checkbox"/> Race	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Sex	<input type="checkbox"/> Familial Status	<input type="checkbox"/> Religion
<input type="checkbox"/> Color	<input type="checkbox"/> National Origin (Language)	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Other
<p>Explain clearly how discrimination occurred and who participated in discrimination. Include in your explanation any way that you feel you were treated unfairly. Attach any other writing that relates to your case.</p>				
Signature			Date	

**Rockford Agencia Metropolitana de Planificación**  
**Formulario de Quejas de Discriminación del Título VI y Estatutos Relacionados**

Nombre	Número de teléfono (Residencia)	Número de teléfono (Trabajo)
Dirección de residencia (Número y calle, número de departamento)	Ciudad, estado, y código postal de residencia	
Nombre de la persona o agencia que usted cree que discriminó en su contra.		
Dirección de la persona o agencia que usted cree que discriminó en su contra.	Ciudad, estado y código postal de la persona o agencia que usted cree que discriminó en su contra.	
Fecha del incidente discriminatorio.		
Causa de la discriminación:		
<input type="checkbox"/> Raza	<input type="checkbox"/> Retaliación	<input type="checkbox"/> Sexo
<input type="checkbox"/> Color de Piel	<input type="checkbox"/> Nacionalidad (Lengua)	<input type="checkbox"/> Edad
<input type="checkbox"/> Estado Civil		<input type="checkbox"/> Religión
<input type="checkbox"/> Impedimento Físico o Mental		<input type="checkbox"/> Otro
<p>Explique claramente como sucedió la discriminación y quienes participaron en la discriminación. Incluya en su explicación cualquier forma en que usted se siente que fue tratado injustamente. Adjunte cualquier otro escrito relacionado con su caso.</p>		
<b>Firma</b>	<b>Fecha</b>	

# Appendix E - Language Identification Flashcard

<input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p>	1. Arabic
<input type="checkbox"/> <p>Խոսողո՞ւմ ե՞ս, կը խոսե՞մ կամ կարդո՞ւմ ե՞ք հայերեն:</p>	2. Armenian
<input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p>	3. Bengali
<input type="checkbox"/> <p>ល្អប្រសើរណាស់ប្រសិនបើ ប្រើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p>	4. Cambodian
<input type="checkbox"/> <p>Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p>	5. Chamorro
<input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p>	6. Simplified Chinese
<input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p>	7. Traditional Chinese
<input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p>	8. Croatian
<input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p>	9. Czech
<input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p>	10. Dutch
<input type="checkbox"/> <p>Mark this box if you read or speak English.</p>	11. English
<input type="checkbox"/> <p>اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید.</p>	12. Farsi

- |                          |  |                    |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français.                                      | 13. French         |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.                | 14. German         |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.                            | 15. Greek          |
| <input type="checkbox"/> | Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.                                | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।                       | 17. Hindi          |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob.                                | 18. Hmong          |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.                   | 19. Hungarian      |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.                    | 20. Ilocano        |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano.                                     | 21. Italian        |
| <input type="checkbox"/> | 日本語を読んだり、話せる場合はここに印を付けてください。   | 22. Japanese       |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.   | 23. Korean         |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.   | 24. Laotian        |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish         |

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

## Appendix F - Public Comments

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This appendix is for the purpose of reviewing and responding to any public comments received regarding the LEP Plan.

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# Appendix G - MPO Metropolitan Planning Area

