

CTF ILLINOIS  
TITLE VI PLAN  
2024

## I. INTRODUCTION

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. Specifically, Title VI provides that "no person in the United States 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." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

During the Obama Administration, the Federal Transit Administration ("FTA") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP").

Recipients of public transportation funding from FTA and the Metropolitan Washington Council of Governments ("COG") are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how CTF ILLINOIS (CTF) incorporates nondiscrimination policies and practices in providing services to the public.

## II. OVERVIEW OF SERVICES

For over fifty years, CTF has provided supports to adults with intellectual and developmental disabilities (I/DD). CTF operates in seven counties throughout ILLINOIS, including Cook and Will. CTF offers Home-based Community Medicaid Wavier facilitation supports, Community Day Programs, Community Integrated Living Arrangements (CILAs), and a Community Mental Health Center.

CTF's mission is to empower each individual we serve to live the life they want to live, which we accomplish by supporting their personal goals. Due to their disabilities, 98% of the persons we support are unable to obtain a driver's license and must rely on public or private transportation services. Furthermore, 94% are unable to take public transportation due to their disability and/or the location of their home or job. Because of these factors, CTF operates its own door to door transportation service. Transportation is provided between homes and jobs, programs, medical appointments, retail locations, and community locations like the public library, parks, or theaters.

### III. GENERAL REPORTING REQUIREMENTS

#### A. Title VI Program Notice:

The Title VI Program Notice is posted in the following locations:

Transportation Department  
Each CILA residence  
Center for Employment  
[www.ctfillinois.org](http://www.ctfillinois.org)

The notice as required by law:

**“No person in the United States shall on the ground of race, color, or national origin be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal Financial Assistance.” (42 USC 2000d)**

#### B. Complaint Procedures, How to File a Grievance, Complaint Process, and Appeal

##### 1. Purpose

To allow a recipient of services an opportunity to voice his or her dissatisfaction with services in direct relation to Title VI of the Civil Rights Act of 1964 services.

##### 2. Grievance Process

- a. Grievances may be made by filling out the Complaint Form (**Exhibit A**) and submitting it via mail or in person to the CTF ILLINOIS administrative office or by contacting a paid or auxiliary staff member in the following positions:
  - i. Director of Transportation
  - ii. Case Manager
  - iii. Associate Director
  - iv. Regional Network Director

The above staff provide patrons an opportunity to voice dissatisfaction with service and a patron may begin a Title VI grievance at any time. Grievance intake is received without judgment and if no satisfaction can be given to the patron, they are directed to speak to their Case Manager.

- a. After a complaint is received, the Transportation Coordinator of the service contacts the patron to discuss the issue. If the client is still dissatisfied, the Case Manager will call and discuss the issue with the patron.
- b. If satisfaction cannot be reached, the Case Manager invites the patron to address the issue with the Associate Director.
- c. Patrons are able to voice a grievance without discrimination or reprisal. If a staff person reacts inappropriately to a complaint, the Regional Network Director will address the issue through some form of corrective action ranging from a management note to written warning up to and including termination based on the incident. Customer Service Training is ongoing and the core value of respect is taken

very seriously. If a staff person acts inappropriately, the incident will be investigated and appropriate corrective action taken, if warranted.

3. Complaint Process

- a. Once a complaint is lodged, CTF ILLINOIS is duty-bound to investigate it with staff and persons involved. If the complaint is a result of an “incident”, an Incident Report is to be completed and signed by the staff member involved. A copy of the Incident Report is given to the Transportation Coordinator and also the Case Manager.
- b. The patron must first discuss his/her grievance with such staff person involved in the complaint in an attempt to resolve the problem. If, after discussion with the persons involved and no resolution can be reached, the Transportation Coordinator contacts the patron to discuss the issue.
- c. The Transportation Coordinator will investigate all sides of the grievance. The patron will be notified in writing of a decision and the supporting reasons within 15 working days of notification of the grievance.

4. Appeal Process

- a. If the grievance is not resolved, the patron may appeal in writing to the Case Manager within five (5) working days of receipt of notification from the Transportation Coordinator of his/her decision. The Case Manager will investigate all sides of the grievance and will notify the patron in writing of his or her decision and supporting reasons within ten (10) working days from the date ~~of~~ the Case Manager receives the written appeal.
- b. If a patron feels uncomfortable discussing the grievance with the Transportation Coordinator, he/she may immediately bring the grievance to the attention of the Case Manager.
- c. Complaint Form
  - i. See Exhibit A

**C. Listing of all Title VI Investigations, Complaints, or Lawsuits**

CTF ILLINOIS has had no transit-related investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin.

**D. Provide Translation of Public Notices**

See Exhibit B

**E. Board Composition**

CTF ILLINOIS does not have any transit-related, non-elected planning boards, advisory councils or committees. See Exhibit C for the composition of the CTF ILLINOIS Board of Directors.

**F. Access for Limited English Proficiency (LEP) Persons****1. Purpose:**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by CTF ILLINOIS is based on FTA guidelines.

**2. Assessment of Needs and Resources:**

CTF ILLINOIS takes reasonable steps to ensure meaningful access to our programs, services, and activities by LEP persons. The starting point to identify the resources and actions needed is by conducting an individualized four factor analysis consisting of:

**i. The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population**

i. CTF ILLINOIS rarely encounters individuals with Limited English Proficiency (LEP) who do not speak English. The most common communication barrier involves individuals who are nonverbal rather than having limited English proficiency.

**ii. The Frequency with Which LEP Individuals Come in Contact with the Program, Activity, or Service**

i. The frequency of contact with LEP individuals is extremely low. Most participants communicate effectively in English, and instances of language barriers are infrequent.

**iii. The Nature and Importance of the Program, Activity, or Service Provided by the Program**

i. CTF ILLINOIS provides critical services, including vocational training, community integration, and support for adults with disabilities. Effective communication, regardless of language barriers, is essential to ensure participants can fully access these services.

**iv. The Resources Available to the Recipient and the Costs**

i. CTF ILLINOIS utilizes resources such as telephonic and video interpretation services, as well as nonverbal communication tools, to assist individuals with communication barriers. The cost of these services is minimal, given the low frequency of need, and is covered within the existing budget.

**3. CTF ILLINOIS provides language assistance services in the following ways:**

- i. Oral Interpretation: CTF ILLINOIS offers interpretation services in languages based on the identified needs of the LEP population. Staff members or qualified interpreters are available to provide real-time language interpretation for interactions such as intake meetings, program orientations, and public events.
- ii. Written Translation: Vital documents, including program descriptions, participant rights, and health and safety materials, are translated into languages most commonly spoken by LEP individuals in the service area.
- iii. Telephonic and Video Interpretation Services: For languages that are less frequently encountered or if an interpreter is not readily available, CTF Illinois uses telephonic or video interpretation services to provide immediate language support.

See **Exhibit D** for the composition of LEP individuals utilizing CTF ILLINOIS' transportation services.

4. Notice to LEP Persons

CTF Illinois ensures that LEP individuals are informed about the availability of language assistance services. Notice is provided through the following methods:

- i. Signage in Facilities: Posters and signs in multiple languages are displayed in all public-facing CTF ILLINOIS facilities, informing LEP persons of their right to language assistance services.
- ii. Website and Digital Platforms: Information about language assistance services is included on the CTF ILLINOIS website, ensuring LEP individuals are aware of the available resources.
- iii. Outreach Materials: Brochures, flyers, and other materials distributed in the community are provided in languages identified as being commonly spoken by LEP populations.

5. LEP Resource Implementation Monitoring and Evaluation

CTF Illinois continuously monitors and evaluates the effectiveness of its LEP policy to ensure it meets the needs of the population. This process includes:

- i. Annual Review: The LEP plan is reviewed annually to assess the effectiveness of language assistance services, based on feedback from staff and participants, as well as changes in LEP demographics.
- ii. Adjustments as Needed: If new LEP populations are identified or if there are significant changes in the needs of the current population, CTF ILLINOIS updates the plan accordingly to provide appropriate language assistance services.
- iii. Feedback Mechanism: CTF ILLINOIS solicits feedback from LEP individuals and community partners to ensure that language assistance services are meeting the needs of participants.

6. Employee Training

As part of our effort to promote accessibility and inclusion in our programs and services, CTF ILLINOIS provides training to all staff on how to provide language assistance services effectively and in a timely manner. This training includes:

- i. Recognition of LEP Individuals: Employees are trained to identify LEP individuals and understand their rights to language assistance services.
- ii. Use of Interpretation Services: Staff are trained on how to access and use interpretation and translation services, including telephonic and video interpretation options.
- iii. Cultural Competency: Training emphasizes the importance of cultural sensitivity and effective communication when working with LEP populations.



**EXHIBIT A**  
**Complaint Form**



**TITLE VI COMPLAINT FORM**

<b>Complainant's Name:</b>		
<b>Address:</b>		
<b>City:</b>	<b>State:</b>	<b>Zip:</b>
<b>Home Phone:</b>		<b>Cell Phone:</b>

What was the discrimination based upon? Check all that apply.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
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Date of alleged discrimination (month, day, year):	
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Explain what happened and why you believe you were discriminated against.
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Please provide witness contact information (name, address, phone number).
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Have you filed this with any other federal, state, or local agency?	Yes		No	
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If yes, Name of Agency:
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I affirm that I have read the above and that it is true to the best of my knowledge, information, and belief.

\_\_\_\_\_  
Signature (Complainant)

\_\_\_\_\_  
Date

Please submit this form and any additional materials in person or mail to: CTF ILLINOIS, Transportation Coordinator, 18230 Orland Parkway, Orland Park, IL 60467

**EXHIBIT B**

**Public Notice**



## TITLE VI NOTICE TO THE PUBLIC

**CTF ILLINOIS** gives public notice that it complies with ~~the~~ Title VI of the Civil Rights Act of 1964 and all related statutes.

Title VI provides that “no person in the United States 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.” CTF ILLINOIS operates its programs and services without regard to race, color, and national origin in accordance with Title VI.

For more information on CTF ILLINOIS’ Title VI Program, obligations, procedures and/or to file complaint, please call (708) 880-7094 and ask for the Transportation Director.

Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file [a](#) complaint with the CTF ILLINOIS. The complaint form can be mailed to:

CTF ILLINOIS  
Attn: Transportation Coordinator  
18230 Orland Parkway  
Orland Park, IL 60467

OR you may visit our administrative office between the hours of 7:30 am to 4:00 pm Monday – Friday at:

18230 Orland Parkway  
Orland Park, IL 60467