CTF ILLINOIS

TITLE VI PLAN
2026

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 five counties throughout Illinois, including Cook County and Will County. CTF offers Home-based Community Medicaid Wavier facilitation supports, Community Day Programs, and Community Integrated Living Arrangements (CILAs).

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. AMERICANS WITH DISABILITIES ACT (ADA) AND REASONABLE ACCOMMODATIONS

CTF Illinois is committed to providing equal access to its programs, services, and transportation activities in accordance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and all other applicable federal, state, and local accessibility and nondiscrimination requirements.

CTF Illinois will not discriminate against individuals with disabilities and will make reasonable modifications to policies, practices, and procedures when necessary to ensure individuals with disabilities have equal opportunity to access and participate in its programs and services, including transportation services, unless doing so would fundamentally alter the nature of the service or create an undue financial or administrative burden.

Individuals may request reasonable accommodations or modifications to ensure accessibility. Requests should be directed to CTF Illinois' designated ADA/Title VI Coordinator and should include a description of the accommodation needed. CTF Illinois will review requests and work with the individual to identify appropriate accommodations or modifications.

CTF Illinois will make reasonable efforts to ensure that individuals with disabilities can access transportation services and related programs without discrimination. CTF Illinois prohibits retaliation against any individual for requesting an accommodation, reporting an accessibility concern, or exercising their rights under the ADA.

IV. TRANSPORTATION OF INDIVIDUALS POLICY

A. Policy

It is the policy of CTF Illinois (CTF) to provide resources, coordinate, and/or provide appropriate transportation services for people served, including those with special transportation needs, to ensure full access to the greater community. Additionally, CTF, through its public transit services, aims to design, implement, and maintain a safe, efficient, effective, and accessible transportation system for people with disabilities, as provided by the ADA and related DOT regulations.

CTF ensures non-discriminatory transportation to enhance the social and economic quality of life for all people of the communities served by CTF. CTF will not refuse to provide service to an individual with a disability solely because the individual's disability results in an appearance or behavior that may offend, annoy, or inconvenience CTF staff/employees or other persons. Additionally, no person shall be refused transportation services because of a special transportation need.

CTF will abide by all provisions of the Americans with Disabilities Act (ADA) of 1990, as amended, and US Department of Transportation (DOT) regulations found at 49 CFR Parts 27, 37, and 38, as amended, in the delivery of transit services that are open to the public and prohibit discrimination based on disability and set specific requirements that transit agencies must follow.

B. Definitions

Wheelchair	A three-or-more-wheeled mobility aid device, usable indoors, designed for and used by individuals with mobility impairments, whether operated manually or powered.
Service Animal	Animals, including dogs, that have been individually trained to work or perform tasks to accompany persons with disabilities in vehicles and facilities.
Interlocks	Interlocks is an electronic safety system installed in wheelchair-accessible vehicles (such as buses, transit coaches, and certain passenger vehicles) that prevents the operation of a wheelchair lift unless the vehicle meets specific safety conditions.

C. Procedure

1. Transportation will be coordinated and/or provided to create access to the community and places where needed services and supports are delivered as identified in the person's person-centered plan and implementation strategy.

2. To foster natural supports, whenever possible and as appropriate, people who receive support should use family, neighbors, friends, or transportation providers/public transportation to access supports, services, and the community.
3. CTF sites will have resources available for people who receive support to access public transportation, such as busing, PACE, RTA, taxi, Uber/Lyft, ride shares, and other modes of transportation that are available in their community.
4. CTF will provide options and opportunities for transportation training to people who receive services as identified within their person-centered plan.
5. CTF may refuse to provide transportation services to a person if that person engages in violent, seriously disruptive, illegal conduct, and/or represents a direct threat to the health or safety of others.

D. CTF Provided Transportation

1. People receiving services are not to be left unattended in vehicles at any time. The driver must check the van from front to back to be sure all passengers have gotten off the vehicle before leaving the vehicle.
2. Service animals are permitted to accompany people with disabilities in vehicles.
    a. Any animal boarding a CTF vehicle must be a certified service animal.
    b. The service animal must remain under the control of the rider and not present an immediate danger to the driver or other riders.
3. Drivers will ensure adequate time for people to board and disembark a vehicle.
4. Drivers will ensure that every rider uses a functioning seatbelt.
5. Drivers will conduct a pre-trip inspection, including checking the presence of properly functioning securement equipment.
    a. All equipment failures will be reported immediately to the Site Supervisor and Director.
6. For CTF vehicles that have wheelchair ramps or lifts, CTF will abide by the following:
    a. Each vehicle used to transport people who use a wheelchair for mobility must have a securement system for wheelchairs.
    b. Drivers will assist riders with the use of the lifts, ramps, and securement systems.
    c. Drivers will use required accessibility related equipment and features on every trip, including seatbelts and tie-downs to secure a wheelchair in a vehicle.
    d. Vehicle interlocks will be inspected for safety before use, as well as during monthly vehicle inspections.
    e. Securement problems of the wheelchair shall be reported immediately to the Site Supervisor and Transportation Director.
        i. Vehicles with malfunctioning interlocks shall be taken out of service immediately until repaired.
    f. CTF will transport a person and their wheelchair, as long as the vehicle and lift can accommodate the size and weight of the passenger and the wheelchair. However, CTF will not transport a wheelchair if the lift or vehicle is unable to accommodate the wheelchair and its user, based on the recommended safety requirements.

E. Community Day Service Transportation

1. All people being transported to and from their residential sites to community day service programs will not have a one-way trip that exceeds one hour.

2. People who receive Community Day Services will not be denied transportation unless they are a danger to themselves or others. Transportation services will only be discontinued upon approval of the Community Support Team (CST). If transportation services are terminated, the CST will develop a plan for alternative transportation services, as well as a plan to reintroduce the person to CTF transportation services. This will be documented within a person's Implementation Strategy.

F. Driver Training

1. CTF will provide transportation training to DSPs, Drivers, Supervisors, and all vehicle operators upon hire and annually thereafter.
2. Transportation training will include the following:
    a. safe operation and driving of vehicles
    b. safe operation of accessibility equipment
    c. customer service and sensitivity training.

G. Vehicle Service and Maintenance

1. CTF will ensure all maintenance on agency vehicles, including their lifts, ramps, securement devices, and signage, is conducted within service and schedule manufacturer requirements for the vehicles, lifts, and other devices/equipment.
2. A monthly maintenance check will be completed each month.
3. Some vehicles (PACE, IDOT) require a pre-trip inspection. These should be completed and filed. Any concerns should be reported to the transportation director.
4. To ensure timely ADA equipment maintenance, standardized procedures, and better tracking records, all ADA service equipment will be serviced during every 6 months at an authorized mobility repair dealership.
5. CTF will track vehicle service dates and will make service information available in accessible formats.

H. Complaint and Modification Procedures

1. CTF is committed to making reasonable modifications to its transportation policies, practices, and procedures to avoid discrimination and ensure transportation, programs, and services are accessible to people with disabilities.
2. Any transportation complaint received by CTF will be immediately investigated, and every effort will be made to seek an appropriate and prompt resolution. Please see **Section V** to learn more about complaint procedures.
    a. CTF will work to make the necessary corrections and/or adjustments to alleviate the situation.
    b. ADA Transportation service complaints shall be submitted in writing on the agency's complaint form and returned to:

CTF Illinois c/o Transportation Department
18230 Orland Parkway
Orland Park, IL 60467

c. If you would like additional information or a copy of this form, please see **Exhibit A** please call CTF Illinois during regular administrative business hours (8:00 AM – 4:00 PM) at (708) 429- 1260 or email info@ctfillinois.org.

V. 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

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 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

CTF Illinois
COMMUNITIES TRANSFORM FUTURES

TITLE VI COMPLAINT FORM

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	☐ Large Print	☐ Audio Tape
	☐ TDD	☐ Other

Section II:		
Are you filing this complaint on your own behalf?	☐ Yes*	☐ No
If you answered "yes" to this question, go to **Section III.*		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	☐ Yes	☐ No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin ☐ 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?	☐ Yes	☐ 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 email this form to info@ctfillinois.org, present in person at the address below, or mail this form to:

CTF Illinois
c/o Transportation Department
18230 Orland Parkway
Orland Park, IL 60467

A copy of this form can be found online www.ctfillinois.org **(Located at the bottom of the home page under policies.)**

EXHIBIT B

Public Notice

TITLE VI NOTICE TO THE PUBLIC

CTF Illinois gives public notice that it complies with 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 8:00 am to 4:00 pm Monday – Friday at:

18230 Orland Parkway
Orland Park, IL 60467

EXHIBIT C

Board Composition

CTF Illinois currently (2026) has 7 individuals who serve on its Board of Directors. The Board of Directors is comprised of:

Females	40%
Males	60%
Caucasian	70%
Black	30%
Age 36-50	50%
Age 51-65	50%
Age 66 or older	0%

EXHIBIT D

LEP Persons Composition

CTF Illinois currently (2026) serves a group of individuals with evolving needs. Due to this factor, we evaluate whether an individual is an LEP person on a case-by-case basis. 100% of the people we serve speak English fluently.