

HENRY COUNTY
PUBLIC TRANSPORTATION

TITLE VI

PLAN

9/26/11, 7/22/14

Henry County Public Transportation
Verification of Level and Quality of Service

TABLE OF CONTENTS

I. Purpose of Plan.....3

II. Henry County Public Transportation Title VI Program.....3

Annual Submissions to Illinois Department of Transportation.....3

Exhibit I: Henry County Public Transportation Title VI Assurance.....4

Title VI Assurance to Federal Transit Administration.....4

Triennial submissions to IDOT.....5

Exhibit II: Title VI Complaint Form.....6,7

Exhibit III: Title VI Complaint Record Keeping.....8

Exhibit IV: English and Non-English Speaking Population.....10

Exhibit V: Title VI Protection Notice to the Public.....12

III. Service Equity Analysis and Verification.....13

**Minority, Low-Income, and Limited English Proficiency Population Concentrations in
 relation to Service Provision.....13**

Map I. Route Network.....15

Map II. Population Density.....16

Chart I. Individuals Below Poverty Level.....18

Chart II. Minority Population.....18

Chart III. Limited English Proficiency Block Groups.....19

Travel Time Analysis.....20

Exhibit VI: Routes Serving Major Destinations.....20

Analysis of Henry County Public Transportation.....20

Exhibit VII: Transportation Center.....21

Exhibit VIII: Abilities Plus.....21

Henry County Public Transportation
Verification of Level and Quality of Service

Table of Contents (continued)

Proposed Service and Fare Change.....21

Service Monitoring.....22

Henry County Public Transportation Environmental Justice and Title VI Summary.....22

Signature and Approval Page.....23

Henry County Public Transportation
Verification of Level and Quality of Service

I. Purpose of Plan

Title VI of the Civil Rights Act of 1964, as amended, applies to U.S. Department of Transportation Federal Transit Administration (FTA) sub-recipients. The purpose of Title VI is to ensure that no person in the United States shall, on the grounds of race, color, creed 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 from the FTA. Later statutes extended the scope of Title VI to include prohibitions against discrimination on the basis of age, sex, and disability.

The program described herein describes Henry County Public Transportation's efforts to comply with the Title VI regulations issued by the U.S. Department of Justice and the U.S. Department of Transportation. The objectives of Henry County Public Transportation Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color, national origin, income, age, sex, or disability;
- Avoid, minimize, or mitigate 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;
- Ensure the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure that persons with limited English proficiency have meaningful access to programs and activities that are administered by recipients and sub-recipients.

II. HENRY COUNTY PUBLIC TRANSPORTATION TITLE VI PROGRAM

Henry County Public Transportation has established the following program to comply with the Department of Transportation (DOT) Title VI regulations.

ANNUAL SUBMISSIONS TO ILLINOIS DEPARTMENT OF TRANSPORTATION (IDOT)

Henry County Public Transportation ensures compliance with the requirements of the Illinois Department of Transportation (IDOT) Title VI Program. Henry County Public Transportation will submit an annual assurance to verify Title VI compliance as part of the standard assurances it submits to IDOT with grant applications. Henry County Public Transportation shall also collect Title VI Assurances from subrecipients prior to passing through FTA funds. Exhibit I on the following page is Henry County Public Transportation's Title VI assurance.

**Henry County Public Transportation
Verification of Level and Quality of Service**

EXHIBIT I: HENRY COUNTY PUBLIC TRANSPORTATION TITLE VI ASSURANCE:

TITLE VI ASSURANCE TO FEDERAL TRANSIT ADMINISTRATION

Henry County Public Transportation hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation--Effectuation of the Title VI of the Civil Rights Act of 1964 and other pertinent directives, to the end and that in accordance with the Act, Regulations, and other pertinent directives, 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 otherwise subjected to discrimination under any program or activity for which Henry County Public Transportation received Federal financial assistance from the Department of Transportation, including the Federal Transit Administration and, Hereby gives assurance that it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above assurances, Henry County Public Transportation gives the assurances as listed in the "Verification of Level and Quality of Service," with respect to the Federal Transit Administration Grant Program.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Transit Administration.

Henry County Public Transportation
Verification of Level and Quality of Service

Triennial Submissions to IDOT

Henry County Public Transportation will report the information contained in this section to IDOT on a triennial basis with the first submission parceled as part of the plan. The following report addresses each of the eight primary Title VI considerations and the associated forms, policies, and activities of its Title VI program.

1. Title VI Complaint Procedures

In order to comply with 40 CFR Section 21.9 (b) Henry County Public Transportation has developed procedures for investigating and tracking Title VI complaints. The procedures for filing a complaint will be made available to members of the general public. Henry County Public Transportation has adopted the Title VI complaint procedures used by IDOT. The following measures will be taken in dealing with Title VI Complaints:

- 1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address, and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Exhibit II provides Henry County Public Transportation's Title VI complaint form.
- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Henry County Public Transportation's Transportation Coordinator. Under these circumstances, the complainant will be interviewed, and the Coordinator will assist the Complainant in converting the verbal allegation into writing.
- 3) Henry County Public Transportation will investigate complaints filed against contractors, consultants, or other sub-recipients. Complaints filed directly against Henry County Public Transportation shall be forwarded to the IDOT Title VI Coordinator for investigation.
- 4) When a complete complaint is received, the Transportation Coordinator will provide written acknowledgement to the Complainant within five (5) days by registered mail. At the same time, the complaint will be forwarded to the State of Illinois for investigation.
- 5) If a complaint is deemed incomplete, additional information will be requested from the Complainant within 15 business days from receipt of the original complaint. The Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Henry County Public Transportation
Verification of Level and Quality of Service

EXHIBIT II: HENRY COUNTY PUBLIC TRANSPORTATION TITLE VI COMPLAINT FORM

HENRY COUNTY PUBLIC TRANSPORTATION

TITLE VI COMPLAINT FORM

Name: _____

Address: _____

Telephone Numbers: (home) _____ (work) _____

E-Mail Address: _____

Accessible Format Requirements?

Large Print ____ Audio Tape ____ TDD ____ Other _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low-income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In Henry County Public Transportation complaint investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. The State of Illinois may also refer the matter to the U.S. Department of Justice for enforcement.

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 the answer was 'no' please supply the name 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 ____

Henry County Public Transportation
Verification of Level and Quality of Service

Section III

Have you previously filed a Title VI complaint with Henry County Public Transportation or the FTA?

Yes ___ No___

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you ever filed with any of the following agencies?

Transit Provider _____ IDOT _____ Department of Justice _____ Equal Employment
Opportunity Commission _____ Other _____

Have you filed a lawsuit regarding this complaint? Yes___ No___

If yes, please provide a copy of the complaint form.

(Note: The above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we will defer to the decision of the court.)

Section IV

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route number, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the Illinois Department of Transportation (IDOT)?

Yes___ No___

May we release your identity to the IDOT? Yes ___ No___

(Note: We cannot accept your complaint without a signature)

Signature_____Date_____

Henry County Public Transportation
Verification of Level and Quality of Service

- 6) Within 15 business days from receipt of a complete complaint, Henry County Public Transportation will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Complainant and Respondent will receive notification of the disposition by registered mail.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the decision is to be investigated, the notification shall inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 7) When Henry County Public Transportation does not have sufficient jurisdiction, the complaint will be referred to IDOT for further investigation.
- 8) If the complaint has investigative merit, an investigator will be assigned. A complete investigation will be conducted, and an investigative report will be submitted within 45 days from the receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations.
- 9) A letter of finding will be issued to the Complainant and Respondent. Where appropriate, these letters will include conciliatory measures. A copy of the investigative report shall be forwarded to IDOT within 60 days from recipient of the complaint. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- 10) If the Complainant is dissatisfied with Henry County Public Transportation resolution of the complaint, he/she has the right to file the complaint with the IDOT Title VI Coordinator directly.

2. Title VI Investigation, Complaint, and Lawsuit Record Keeping Procedures

In order to comply with 49 CFR Section 21.9 (b) Henry County Public Transportation has prepared and maintains a list of active investigations, lawsuits, or complaints naming Henry County Public Transportation that allege discrimination on the basis of race, color, or national origin. The list includes:

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation;
- The status of the investigation; and
- Actions taken in response to the investigation, lawsuit, or complaint.

Henry County Public Transportation has adopted IDOT's Title VI record keeping procedures for complaints, lawsuits, and investigations. Exhibit III on the following page depicts this

Henry County Public Transportation
Verification of Level and Quality of Service

format. There are currently no active investigations, lawsuits, or complaints that allege discrimination by Henry County Public Transportation on the basis of race, color, or national origin.

EXHIBIT III. TITLE VI COMPLAINT RECORD KEEPING

File Date	Summary of Allegation	Actions Taken in Response	Status of Investigation

3. Meaningful Access to LEP Persons

Title VI and its implementing regulations require that FTA sub-recipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their program and activities that have Limited English Proficient (LEP) individuals. Circular 4702.1A states that LEP persons are *“persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well, or do not speak English at all.”*

Henry County Public Transportation has assessed the four main factors involved in developing a Language Implementation Plan as described in the Federal Transit Administration guidance entitled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.” These steps are as follows:

- (1) Identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by a program activity, or service of the recipient or grantee. Based on the 2010 U. S. Census, Henry County Public Transportation undertook an analysis of the languages spoken in Henry County and estimated the number of residents with Limited English Proficiency by language group. A summary of this data is provided below in Exhibit IV. As can be seen, the primary language spoken at home within the Henry County Public Transportation service area is English (93.2%) followed by Spanish (4.2%). Approximately 5.4 percent of the residents 5 years of age and older speak a language other than English at home and 1.3 percent (%) of the residents in the service area speak English “less

Henry County Public Transportation
Verification of Level and Quality of Service

than very well.” Based on the LEP definition, a total of 2120 of the 50,486 individuals living in the Henry County Public Transportation service area, or 4.2 percent (%) of the total population were identified as having Limited English Proficiency. A detailed breakdown of the English Proficiency data obtained from the 2010 Census is provided in an appendix to this report.

Exhibit IV. English and Non-English Speaking Residents of Henry County

Total Population	50486	100.00%
Speak only English (5 yrs. and over)	47068	93.2%
Speak Spanish (5 yrs. and over)	2120	4.2%
Speak English “less than very well”	504	1%
Speak other Indo-European languages	567	1.1%
Speak English “less than very well”	169	.3%
Speak Asian and Pacific Island languages	37	.1%
Speak English “less than very well”	21	.0%

- (2) Determining the frequency with which LEP individuals come in contact with the program. The Henry County Public Transportation has not received a ride request from any individual who had difficulty communicating in English. Henry County Public Transportation, however, is aware of individuals and agencies within the community that are able to provide translation services on an as needed basis and is committed to using these resources on a case by case basis as the need arises.
- (3) Defining the nature and importance of the program, activity, or service provided by the recipient to people’s lives. Abilities Plus’ mission is *“to promote opportunities that result in independence and active decision making for people with disabilities and their families”*. As a program managed by Abilities Plus, Henry County Public Transportation abides by this mission. And, the systems brochures clearly state that Henry County Public Transportation is open to all without discrimination based on race, creed, color, national origin, gender, sexual orientation, or disability. As such, Henry County Public Transportation recognizes and is committed to the importance of access to transportation for all community residents.
- (4) Describing the resources available to the recipient and costs. Henry County Public Transportation has consulted with several local agencies and the Illinois Department of Transportation to identify common practices for addressing the communication needs of LEP individuals. Based on these contacts, Henry County Public Transportation is working with the local academic and medical communities to identify a base of volunteers that can provide translation services. As the need arises, Henry County Public Transportation is committed to working with each individual(s) and their advocates, as appropriate, to determine the best method of communication.

Henry County Public Transportation
Verification of Level and Quality of Service

The USDOT LEP Guidance identifies 1000 individuals or 5% of the population eligible to be served falling within a specific LEP language group as a threshold above which vital documents should be provided in translation. Since Henry County Public Transportation service area does not meet this threshold, a LEP Implementation Plan has not been established. However, Henry County Public Transportation has determined that the most cost effective means of delivering competent and accurate language services is to address the need on a case-by-case basis. As such, Henry County Public Transportation will have available summaries of all vital documents translated upon request to suit the needs of each individual. In addition, qualified community volunteers will be used when oral translation is needed. Any further requirement will be discussed individually on an as requested basis.

4. Beneficiary Notification Protection under Title VI

In order to comply with 49 CFR Section 21.9 (d), sub-recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Henry County Public Transportation disseminates this information to the public through measures that include posting on the transit system website, and flyers placed at ticket outlets. The notice will be translated into languages other than English consistent with LEP Guidelines. Exhibit IV is Henry County Public Transportation's Title VI Protection Notice to the Public. The notice was adopted from IDOT.

Henry County Public Transportation
Verification of Level and Quality of Service

**EXHIBIT V: HENRY COUNTY PUBLIC TRANSPORTATION TITLE VI PROTECTION NOTICE
TO THE PUBLIC**

Henry County Public Transportation hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally-assisted programs require that no person in the United States of America shall on the grounds of race, color, or national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to, discrimination under any program or activity receiving Federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discretionary practice regarding Henry County Public Transportation's programs has the right to file a formal complaint. Any such complaint must be in writing and submitted to Henry County Public Transportation Title VI Coordinator within sixty (60) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

Lauren Dynes-Gillespie, Transportation Coordinator

1100 N. East Street

Kewanee, IL 61443

5. Additional information requests

Henry County Public Transportation fully understands that IDOT may request additional information to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. Henry County Public Transportation will cooperate with IDOT, and all requested information will be provided in a timely manner.

6. Submission of Title VI Program

To ensure compliance with 49 CFR Section 21.9 (b), this report will serve as documentation of Henry County Public Transportation's Title VI compliance. Henry County Public Transportation will prepare and submit updates to this Title VI program to the IDOT on a triennial basis.

Henry County Public Transportation
Verification of Level and Quality of Service

7. Conducting Analysis of Construction Projects

Henry County Public Transportation will integrate an environmental justice analysis into the National Environmental Policy Act (NEPA) document of construction projects. In the event that a construction project requires NEPA documentation, Henry County Public Transportation will complete IDOT's standard environmental assessment (EA) and will submit the EA as part of each triennial Title VI submission.

8. Promoting Inclusive Public Participation

In compliance with the DOT Order on Environmental Justice, Henry County Public Transportation conducts public outreach and involvement activities with minority and low-income populations. Henry County Public Transportation undertakes public outreach activities including:

- Provide notice and affording members of the public, including minority and low-income populations, the opportunity to comment on proposed service and fare changes.
- Provide members of the public the opportunity to participate in the decision making process for projects subject to the National Environmental Policy Act (NEPA).
- Provide members of the public, including minority and low-income populations, the opportunity to participate in or to comment on the agency's strategic plan or capital improvement program.
- Offers the public, including low-income and minority populations, routine opportunities to provide feedback or comment on the level and quality of service.

III. SERVICE EQUITY ANALYSIS AND VERIFICATION

MINORITY, LOW-INCOME, AND LIMITED ENGLISH PROFICIENCY POPULATION CONCENTRATIONS IN RELATION TO SERVICE PROVISION

Included on the following pages are demographic and service profile maps and charts that illustrate minority population in relation to Henry County Public Transportation services. Map 1 on the following page depicts the area the four demand response routes for Henry County Public Transportation travel within Henry County. Depicted on this map are I-80, Hwy 78, 34, 81 and 82.

Population Density in Henry County Public Transportation's Service Area

The second map outlines the population density for Henry County Public Transportation service area and out-lying areas. The greatest population density lies in Kewanee, on Hwy 78 and 34. All demand response routes run directly through Kewanee.

Henry County Public Transportation
Verification of Level and Quality of Service

Areas of Predominately Low-income Communities

The first chart identifies the percentage of low income individuals who reside within Henry County. The greatest cluster of low-income households is located in the southeast portion of the county, in Kewanee Illinois. All demand response routes runs directly through the low-income level neighborhoods and covers the areas with the greatest number of low-income households. The route structure provides transportation to major locations such as recreation centers, Wal-Mart, Black Hawk College and the Kewanee downtown area.

Minority Block Groups

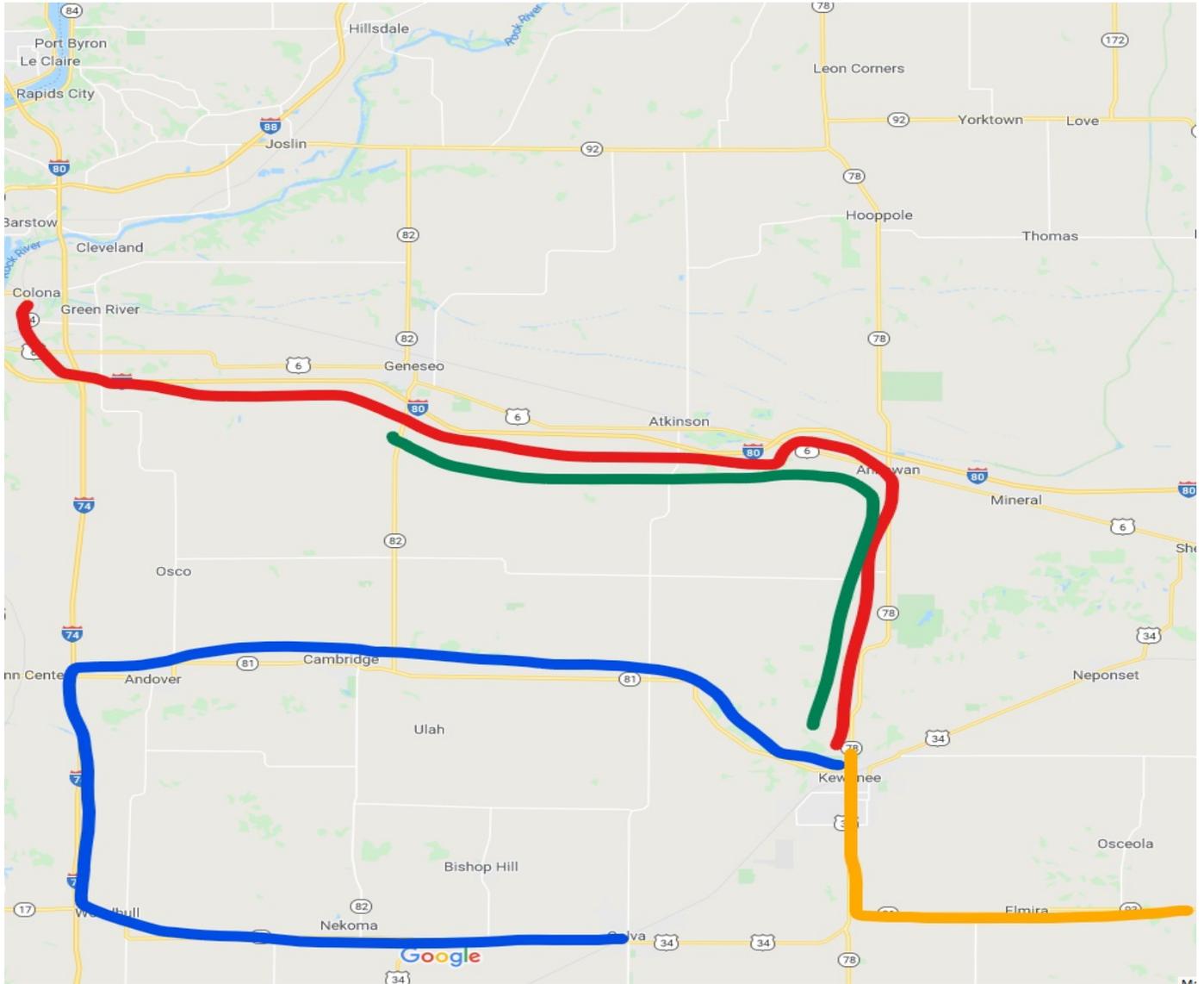
The second chart indicates the percentage of minority populations that reside in Henry County. The City of Kewanee has the highest number of minority residents (10%). The State of Illinois average is 17.4% percent. Henry County Public Transportation service routes runs directly through the area with the largest number of minority persons.

Areas of Limited English Proficient Individuals

The final chart serves as an indicator of the households that have limited English proficiency within the Henry County Public Transportation service area. The average number of people with limited English proficiency in Henry County is 4.2% which is low compared to the state average of 23%. The vast majority of individuals with limited English proficiency live in Kewanee.

**Henry County Public Transportation
Verification of Level and Quality of Service**

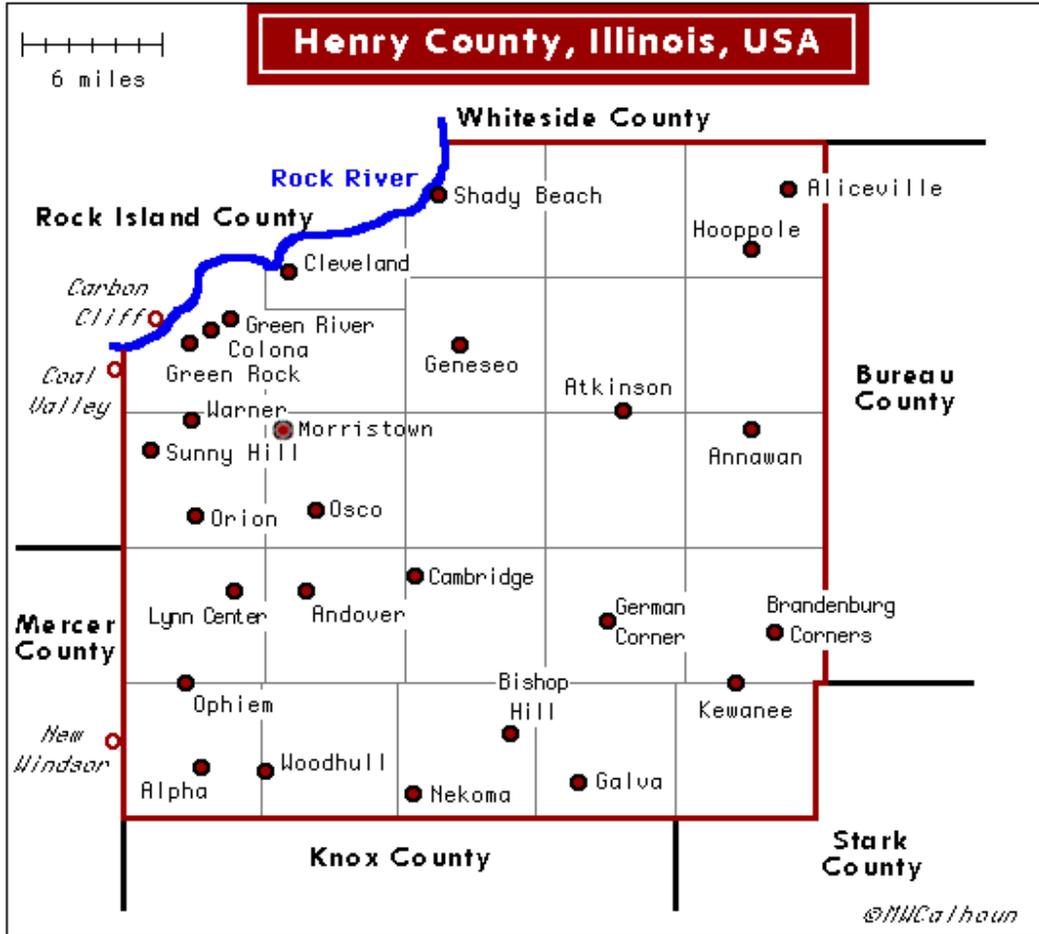
MAP I. ROUTE NETWORK



YELLOW=ROUTE 1-KEWANEE/TOULON/BRADFORD
RED=ROUTE 2-KEWANEE/GENESEO/COLONA
BLUE=ROUTE 3-KEWANEE/ANDOVER/GALVA
GREEN=ROUTE 5-KEWANEE/ATKINSON/GENESEO

**Henry County Public Transportation
Verification of Level and Quality of Service**

MAP II. POPULATION DENSITY



Henry County Public Transportation
Verification of Level and Quality of Service

POPULATION OF HENRY COUNTY CITIES FROM 2010 CENSUS

	2010 population	% of County Population
Henry County	50,486	100%
Alpha	671	1.3%
Andover	578	1.1%
Annawan	878	1.7%
Atkinson	972	1.9%
Bishop Hill	128	.3%
Cambridge	2,160	4.3%
Cleveland	188	.4%
Colona	5,099	10.1%
Galva	2,589	5.1%
Geneseo	6,586	13.0%
Hooppole	204	.4%
Kewanee	12,916	25.6%
Orion	1,861	3.7%
Woodhull	811	1.6%
Unincorporated Areas	14,845	10.1%

**Henry County Public Transportation
Verification of Level and Quality of Service**

CHART I. INDIVIDUALS BELOW POVERTY LEVEL

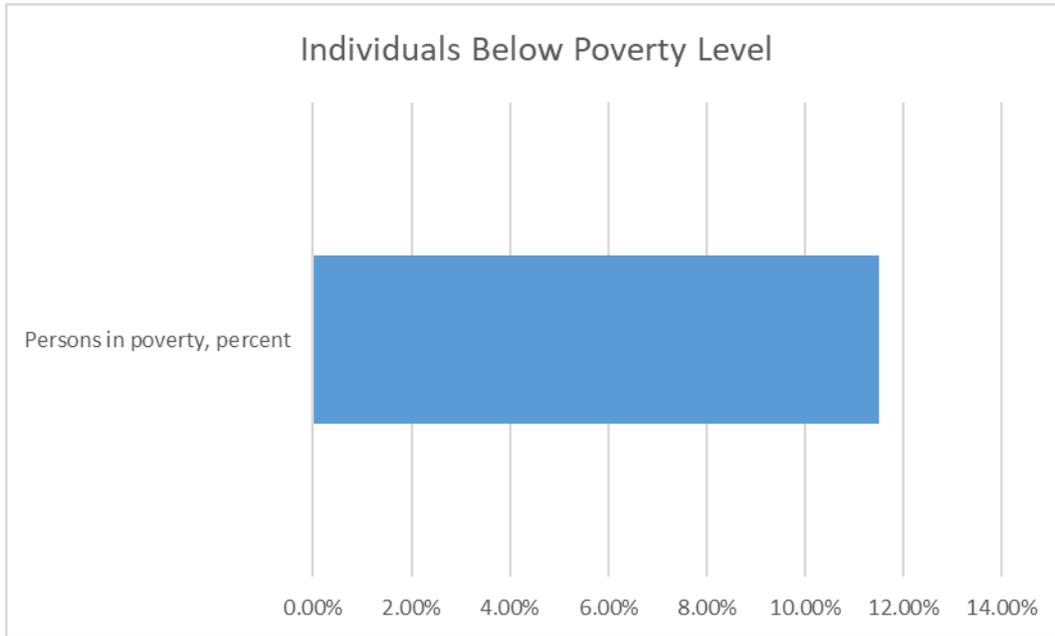
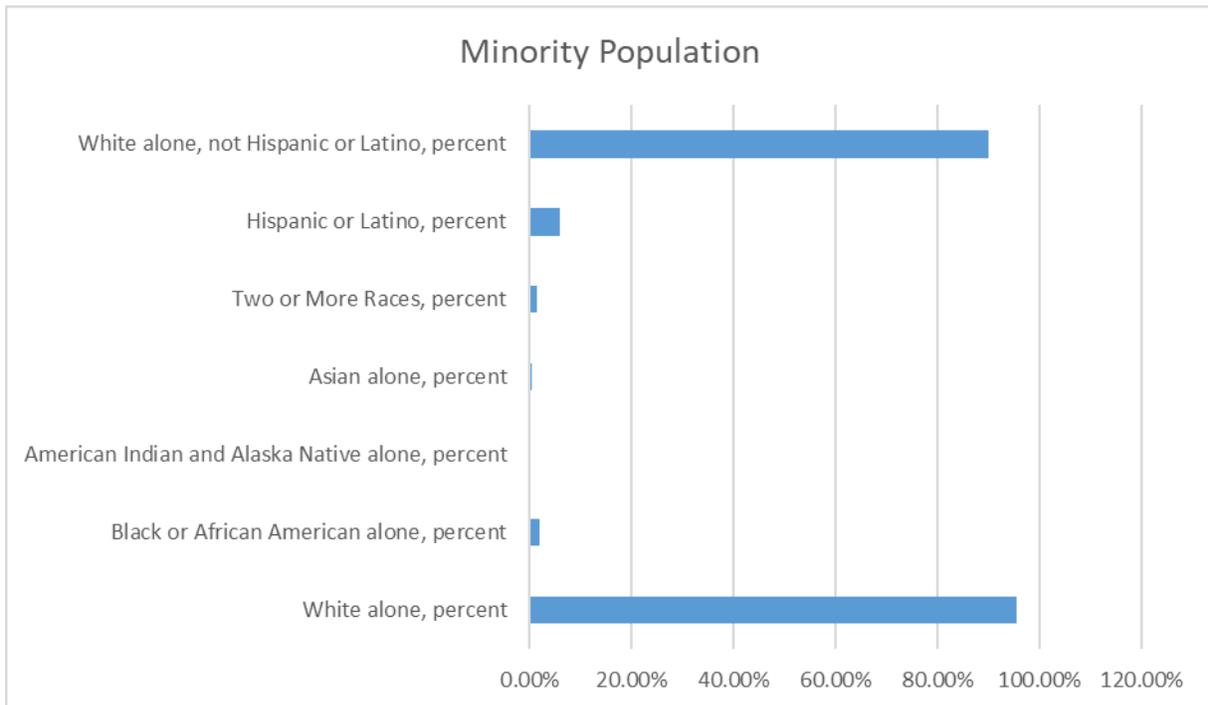
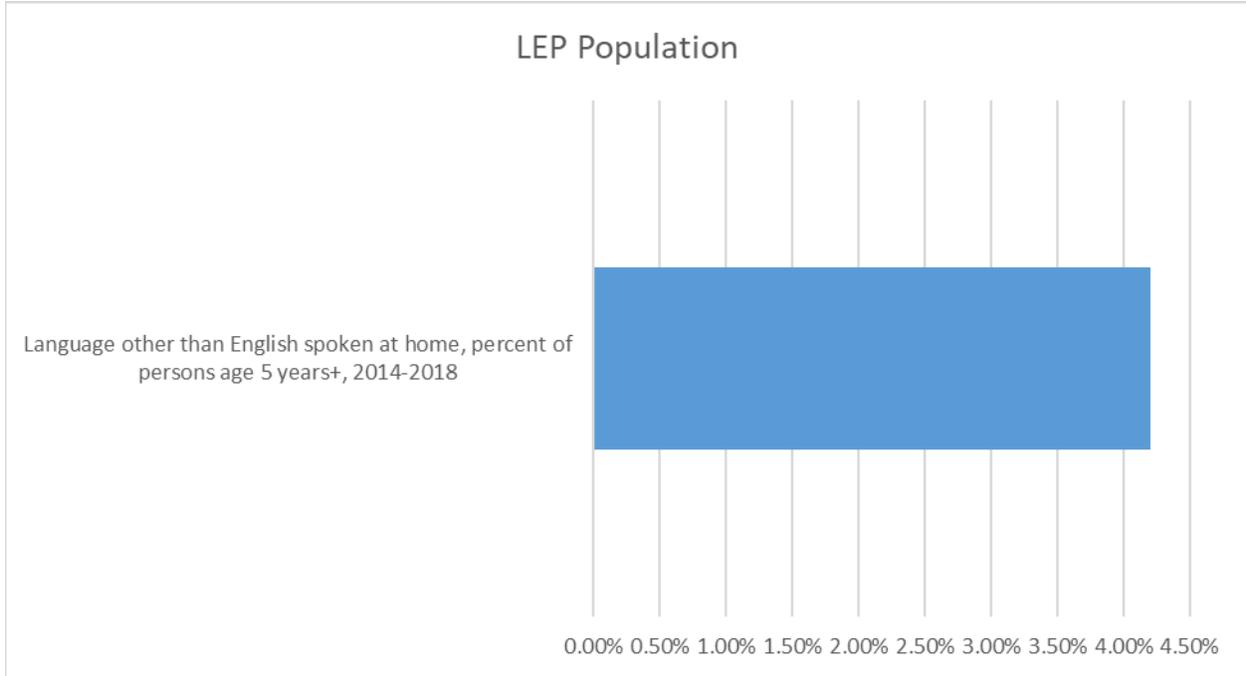


CHART II. MINORITY POPULATION



**Henry County Public Transportation
Verification of Level and Quality of Service**

CHART III. LIMITED ENGLISH PROFICIENCY BLOCK GROUPS



Henry County Public Transportation
Verification of Level and Quality of Service

TRAVEL TIME ANALYSIS

To properly and appropriately verify the level and quality of service, Henry County Public Transportation has developed an equity analysis. The analysis includes evaluating travel times between predominately minority and low-income communities and the major destinations within the service area. This information is compared to all other block groups within the service area to calculate the average travel time to major destinations. The geographic distribution of the target population was identified using the 2000 U.S. Census households below poverty level data, minority data, and LEP data. The major destinations are traffic generators located within the City of Kewanee. The four major demand response routes for Henry County Public Transportation are identified in Exhibit V. The times indicated in the analysis were calculated using the optimum travel and transfer wait times for each route, assuming that the average bus rider will choose the trip with the shortest travel time.

EXHIBIT VI: ROUTES SERVING MAJOR DESTINATIONS

Major Destination	Routes
Kewanee/Toulon/Bradford	Route #1
Kewanee/Geneseo/Colona	Route #2
Kewanee/Andover/Galva	Route #3
Kewanee/Atkinson/Geneseo	Route #5

The predominately minority and low-income community identified is the city of Kewanee.

ANALYSIS OF HENRY COUNTY PUBLIC TRANSPORTATION

Henry County Public Transportation travel times were calculated between Kewanee, which is the central location within each target area and the major destinations listed above. This was accomplished using Henry County Public Transportation van schedules.

Also included on the exhibits is the frequency in minutes that the bus arrives at each of the specific towns. On average, a van arrives at each town within normal drive time. On most trips there are no transfers required to get to a destination.

Transportation Center

Travel times to the Transportation Center were calculated between Kewanee, which is the central location within each target area and the major destinations listed above. This was accomplished using Henry County Public Transportation van schedules.

Exhibit VI below illustrates the frequency of vans, travel times, average travel times, and the difference between the two.

Henry County Public Transportation
Verification of Level and Quality of Service

EXHIBIT VII: TRANSPORTATION CENTER

Routes	Avg. # of Transfers	Travel Time	Average Travel Time	Difference
Kewanee/Toulon/Bradford	15	1.5 hours	3 hours	1.5 hours
Kewanee/Geneseo/Colona	16	1 hour	2.5 hours	1.5 hours
Kewanee/Andover/Galva	12	50 minutes	2.5 hours	1.5 hours
Kewanee/Atkinson/Geneseo	10	1 hour	2.5 hours	1.5 hours

Abilities Plus

Abilities Plus serves people with disabilities. Travel times to Abilities Plus were calculated using the same four demand response routes in the Henry County Public Transportation service area. Exhibit VII below illustrates the frequency of vans, travel times, average travel time, and the difference.

EXHIBIT VIII: ABILITIES PLUS

Routes	Avg. # of Transfers	Travel Time	Average Travel Time	Difference
Kewanee/Toulon/Bradford	15	1.5 hours	3 hours	1.5 hours
Kewanee/Geneseo/Colona	16	1 hour	2.5 hours	1.5 hours
Kewanee/Andover/Galva	12	50 minutes	2.5 hours	1.5 hours
Kewanee/Atkinson/Geneseo	10	1 hour	2.5 hours	1.5 hours

PROPOSED SERVICE AND FARE CHANGES

Based on this analysis, Henry County Public Transportation provides equivalent service to all individuals within their service area without regard to race, color, national origin, or income level. Equivalency was measured in terms of vehicle headway, on-time performance, service availability, vehicle load and amenities. Any time Henry County Public Transportation considers modifying its service or fare, the proposed changes will be assessed to determine whether those changes have a discriminatory impact, and identify alternatives available for people who are affected as appropriate.

The analysis of future proposed changes that will reduce or expand frequency of service or add/eliminate routes will include a comparative analysis of the mapped demographic data for the new service area and the Census tracts where the total minority and low-income populations are

Henry County Public Transportation
Verification of Level and Quality of Service

greater than the service area average. For proposed changes that would reduce or expand hours and days of service, or would change the fare, Henry County Public Transportation will conduct an analysis to determine how minority and low-income riders will be impacted particularly in relation to changes in travel time and cost.

The analysis will describe the actions Henry County Public Transportation proposes to minimize, mitigate, or offset any adverse effects of the proposed fare and/or service changes on minority and low-income populations. The analysis will also determine if the proposed changes will have a disproportionately high and adverse impact on minority and low-income riders when compared to the total ridership.

SERVICE MONITORING

The Transportation Coordinator of Henry County Public Transportation will monitor service level and service quality to ensure that no person or group of persons shall be discriminated against with regard to the route, scheduling, or quality of transportation service furnished by Henry County Public Transportation system, on the basis of race, color, national origin, age, sex or disability. Frequency of service, age and quality of vehicles assigned, quality of facilities, and location of routes shall not be determined on the basis of race, color, national origin, age, sex, or disability.

HENRY COUNTY PUBLIC TRANSPORTATION ENVIRONMENTAL JUSTICE AND TITLE VI SUMMARY

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin. IDOT and Henry County Public Transportation advance Title VI and environmental justice by involving the public in transportation decisions. Effective public involvement programs enable transportation professionals to develop systems, services, and solutions that meet the needs of the public, including minority and low-income communities.

There are three fundamental environmental justice principals. The three principals are:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Henry County Public Transportation
Verification of Level and Quality of Service

This policy was approved at the April 27, 2020 meeting of the Board of Directors.

SIGNED:  4-29-2020
Board President Date

 4-29-20
Board Secretary Date

This policy goes into effect as of the date of the Board meeting at which it is approved.