



Rockford Mass Transit District

Title VI Program | 2027-2029



Final Report
September 2026

Rockford Mass Transit District

Title VI Program | 2027-2029

Final Report

9.29.2026

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In Accordance with:

FAST Act, MAP-21, FTA C 4702.1B and FTA C 4703.1

This report was prepared in cooperation with the following:

U.S. Department of Transportation

Federal Highway Administration

Federal Transit Administration

Illinois Department of Transportation

The contents, views, policies and conclusions expressed in this report are not necessarily those of the above agencies.

For complaints, questions, or concerns about civil rights or nondiscrimination; or for special requests under the Americans with Disabilities Act, please contact: Internal Services Department at (815) 319-4180 or info@r1planning.org

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Chapter 1: Purpose

Section 601 of Title VI of the Civil Rights Act of 1964 requires 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.”

All programs receiving funding from the Federal Transit Administration (FTA) are required to follow the U.S. Department of Transportation’s Title VI regulations of 49 CFR Part 21. As a recipient of FTA financial assistance, the Rockford Mass Transit District (RMTD) is required to prepare a Title VI Program as stipulated in FTA Circular 4702.1B, released October 1, 2012. The objectives of this circular are to provide FTA recipients with the direction, guidance, and procedures to ensure the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Following the requirements laid out in Circular 4702.1B, RMTD is required to prepare a Title VI Program comprised of a public notice of protection against discrimination, procedures to filing a Title VI discrimination complaint, public participation plan, language assistance plan, racial composition of membership on non-elected transit related boards or committees, equity analysis related to determination of the site of location of any new transit facilities, and establish system-wide service standards and policies. The Title VI program must be approved by the RMTD Board of Directors and submitted every three years.

Title VI

FTA released a circular in 2012, FTA 4702.1B which outlines Title VI requirements. Title VI is a Federal statute, and as such, in the event of discrimination legal action may be sought. Executive Order 12898, however, is not enforceable in court and does not create any legal rights or remedies. While E.O. 12898 does not create a protected class for low-income populations, RMTD recognizes the close relationship between the two and believes it is important to include the consideration of effects borne by low-income populations in our Title VI considerations and assessment.



Chapter 2: Definitions

The following text are several definitions applicable to this Title VI Program, found in Chapter 1 of FTA Circular 4702.1B.

Demand Response System: Any non-fixed route system of transporting individuals that requires advanced scheduling, including services provided by public entities, non-profits, and private providers.

Discrimination: Any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Fixed Route: Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficiency (LEP) Person: A person for whom English is not their primary language and has limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census they speak English less than very well, not well, or not at all.

Low-Income Person: A person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

Metropolitan Planning Organization (MPO): The policy board of an organization created and designated to carry out the metropolitan transportation planning process.



Minority Person, includes the following:

1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
6. Some other race alone, which is a category that respondents can select if they do not identify with White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander. However, this should not be used for ethnicity.
7. Two or more races, which refers to combinations of two or more of the following race categories: White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, or Some Other Race.

Primary Recipient: Any FTA recipient that extends Federal financial assistance to a subrecipient.

Subrecipient: An entity that receives Federal financial assistance from FTA through a primary recipient.

Chapter 3: About Rockford Mass Transit District

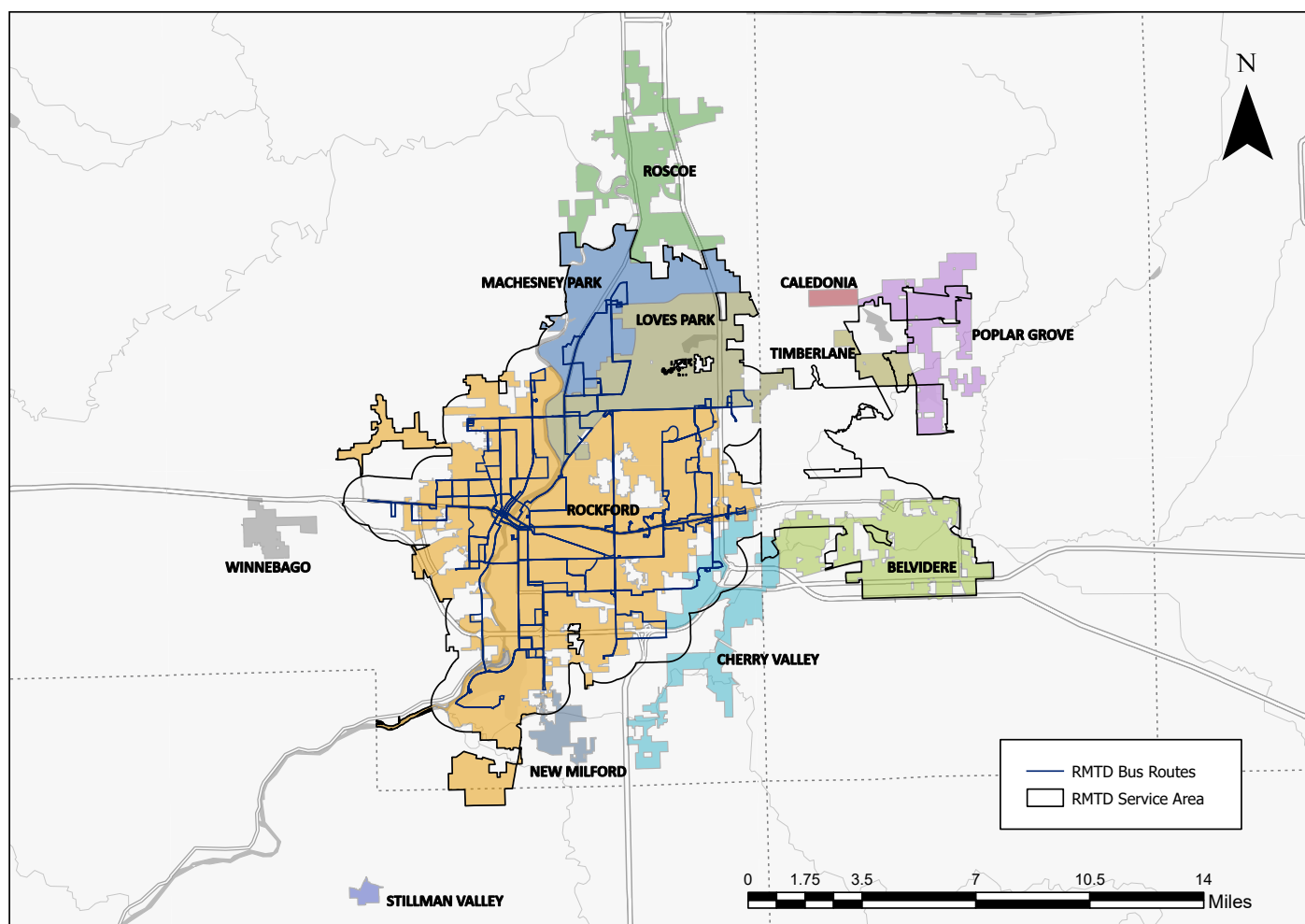
Rockford Mass Transit District (RMTD) is dedicated to providing safe, efficient, affordable, dependable, and accessible transportation to the residents of Rockford and the surrounding area. For 55 years, RMTD has provided federally - subsidized and coordinated, fixed-route transit services for the Rockford Urbanized Area.

RMTD provides fixed-route and complimentary origin-destination paratransit services within Rockford, Loves Park, Machesney Park, portions of Cherry Valley and unincorporated areas of Winnebago County in the urbanized area, and subcontracts the Boone County Council on Aging (BCCA) to provide demand-response services in the

urbanized portions of Boone County. Stateline Mass Transit District (SMTD) provides on-demand transit service to South Beloit, Rockton, and Roscoe, which RMTD operates. RMTD's service area covers approximately 153 square miles and an estimated 281,885 residents¹, with an annual ridership of 1,424,166 passengers in 2026. RMTD's required service area and applicable municipalities are illustrated in Figure 3-1.

¹ Population estimates are based on 2020-2024 American Community Survey Census Block Groups that touch the RMTD Service Area, and do not represent an exact figure.

Figure 3-1: Rockford Mass Transit District Service Area Map



Source: Region 1 Planning Council

Fixed Route Service

RMTD operates 20 daily fixed-routes (Monday—Saturday), six (6) weeknight routes, and eight (8) Sunday routes. Most of RMTD’s fixed route services are provided on a hub-and-spoke radial operation pattern originating from RMTD’s Downtown Transfer Center in Rockford. General service hours include service to all municipalities during weekdays, service to Rockford, Loves Park, Machesney Park, portions of Cherry Valley and unincorporated areas of Winnebago County in the urbanized area, on Saturdays, and select areas in Rockford and Loves Park on Sundays. Services are not provided on Saturday and Sunday nights.

RMTD’s fixed-route fleet consists of 41, 35-foot buses and one special event trolley. Currently, RMTD has 8 diesels, 27 hybrid-electric buses, and 6 battery electric buses.

Most fixed routes run at 60-minute headways. Exceptions include School Street, East State, City Loop North, City Loop South, N Main St, and 7th street routes which run every 30 minutes. Over the past several years, RMTD has been phasing in span of service, hours of operation and route changes that were recommended as part of a Comprehensive Mobility Analysis conducted in 2022. RMTD has added an electronic ticket purchase option and cashless payment options through the Token Transit app. This app can be downloaded by anyone with a smartphone from the Google Play Store or App Store. During the months of May through September, RMTD also runs an additional downtown circulator route with its Trolley on Friday nights to help ease traffic congestion and parking during popular public events such as the Rockford City Market.

Table 3-1: RMTD Summary Statistics

Category	Statistic
Service Area	153 Sq. Miles
Service Population	281,885
Number of Fixed Routes	20
Fixed Route Bus Fleet	41
Buses in Peak Service	28
Paratransit Fleet	33

Paratransit and Demand Response Services

In addition to fixed-route transit services, RMTD provides



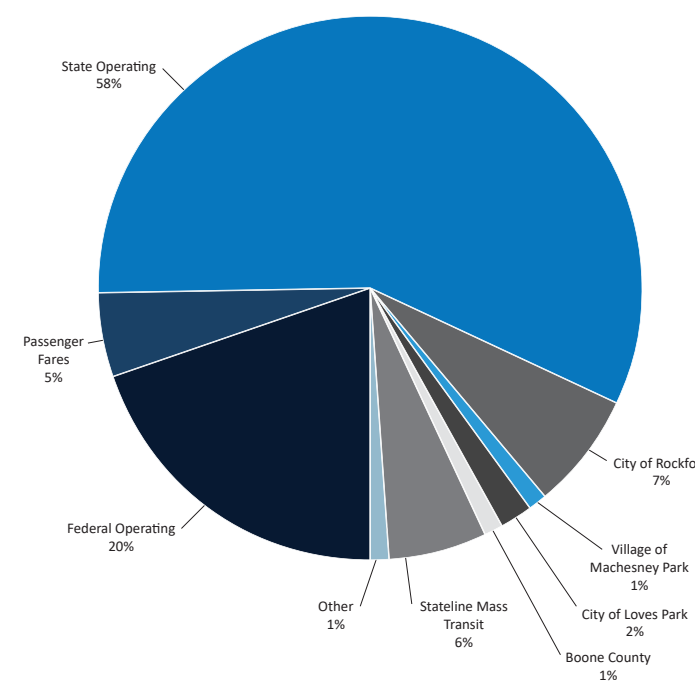
complimentary origin-destination paratransit service at a minimum of three-quarters of a mile from its fixed-route system in accordance with all aspects of the Americans with Disabilities Act. Where applicable, this service is also extended to the incorporated limits of Rockford, Loves Park, Machesney Park, portions of Cherry Valley and unincorporated areas of Winnebago County in the urbanized area. Service is provided daily in Rockford and portions of Loves Park and six days a week in all of Loves Park and Machesney Park. Hours of operation for demand-response and paratransit service are the same as those of fixed-route service. Although weeknight fixed-route service is only available in Rockford and portions of Loves Park, complimentary paratransit service is extended to 10:00 p.m. for Loves Park and Machesney Park. RMTD maintains multiple service agreements with adjacent public transit agencies for demand-response services. Through an intergovernmental agreement (IGA) with Boone County, RMTD subcontracts Boone County Council of Aging (BCCA) to provide demand-response service to the urbanized portions of the county. Similarly, an IGA exists with Stateline Mass Transit District (SMTD) for RMTD to operate demand-response service throughout Rockton and Roscoe Townships, which lay adjacent to the northern portion of RMTD’s service area. The electronic ticket purchase and cashless payment options through the Token Transit app that are available on the fixed route system are also available on the paratransit and demand response system. The cost to ride RMTD Paratransit for eligible riders is \$3.00 each way. Cash fares in the exact amount, tickets, or the Token Transit app are accepted

RMTD’s demand response fleet is comprised of 33 medium and super-medium duty transit buses (2 diesels and 31 gasoline), each with a state or federally defined useful life of five (5) to eight (8) years.

Funding

RMTD is funded through a combination of Federal, State, and local subsidies, contractual payments for service provision, and internally generated revenue, including fares charged to transit patrons, advertising on their buses, and other small funding sources. A breakdown of the 2026 operating revenues, contractual service payments, and subsidies needed to provide service are displayed in Figure 3-2. State operating accounts for 58.0 percent of 2026 operating revenues, followed by federal operating at 20.0 percent. Passenger fares make up just 5.0 percent of 2026 operating revenues at \$1,374,461. In addition to providing service in the Rockford Region, RMTD is also the purchased service provider for Stateline Mass Transit District (SMTD), and subcontracts Boone County Urbanized service to the Boone County Council on Aging.

Figure 3-2: 2026 Operating Revenues



Organization	Operating Revenues (%)
Federal Operating	20%
Passenger Fares	5%
State Operating	58%
City of Rockford	7%
Village of Machesney Park	1%
City of Loves Park	2%
Boone County	1%
Stateline Mass Transit	6%
Other	1%

Table 3-2: RMTD Fare Prices

Fare Type	Cash Fare
Children Under 5 (must be accompanied by an adult)	Free
Student Age 5-14 (Grades K-8)	Free
Students Age 15-18 (Grades 9-12 with valid school or RMTD Photo ID)	Free
Adults (Age 15 and above)	\$1.50
Disabled Citizens (with valid RMTD photo ID)* *Any person with a Medicare Card can qualify for reduced fare service on the RMTD system.	\$0.75
Disabled Citizens enrolled in Illinois Benefits Access program (with valid RMTD photo ID)	Free
Senior Citizens (age 65 and over with valid RMTD photo ID)	Free
Veterans (with valid RMTD photo ID)	Free

Ride Options	Ticket Fare
1-Day Adult Fare Pass	\$3.00
Ten-Ride Adult Fare Tickets	\$15.00
1-Day Disabled Citizens Half Fare Pass (with valid RMTD Photo ID)	\$1.50
Ten-Ride Disabled Citizen Half Fare Pass (with valid RMTD photo ID)	\$7.50
7 Day Unlimited Ride Saver Pass	\$16.00
30 Day Unlimited Ride Saver Pass	\$55.00

Board and Committee Representation

RMTD is governed by a three-person Board of Trustees appointed by the City of Rockford and empowered through the State of Illinois' Downstate Transportation Act of 1971. The Mayor of Rockford is responsible for board member appointments. It has been the City's practice to appoint a diverse board, which is proven by the current make-up of the board which is 2/3 diverse. As required through FTA Circular 4702.1B, Table 3-3 provides a breakdown of RMTD Board members by race and ethnicity.

RMTD is also an active participant of the Region 1 Planning Council (R1) Community Advisory Forum (CAF), which is partially charged with facilitating public involvement to identify transportation needs, identify and work with resource agencies to develop strategies that address the transportation needs of public transit dependent populations, and advocate for enhancements, expansion and new services that improve the well-being of public transportation dependent populations. Active participation provides RMTD the opportunity to engage representatives from minority and transit-dependent populations on transit-related issues. Further goals and strategies to actively engage minority populations are included in the Public Participation Plan included later in this document.

Table 3-3: Composition of RMTD Board

Representation	Service Area	RMTD Board
White	63.29%	33%
Black or African American	13.56%	33%
Asian	3.20%	0
American Indian / Alaskan Native	0.81%	0
Native Hawaiian / Other Pacific Islander	0.04%	0
Some Other Race	6.75%	0
Two or More Races	12.53%	0
Hispanic / Latino Ethnicity	17.04%	33%

Chapter 4: Nondiscrimination Policy

The Rockford Mass Transit District seeks to provide fair and equitable transportation to all persons within the District's service area. No person shall be discriminated against on the basis of race, color, or national origin. RMTD agrees to compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the U.S. Department of Transportation's Title VI Regulation at 49 CFR Part 21.

Furthermore, RMTD will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation. The following policies and procedures in the duration of this document are intended to ensure that RMTD continues to provide the best service possible for all our patrons.

The following Title VI program was approved by the Rockford Mass Transit District Board of Directors on September 28, 2026. A copy of the resolution can be found in [Appendix A](#).

Notice to the Public

RMTD's Title VI Notice is widely distributed. Notice is posted at the Downtown Transfer Center and East Side Transfer Center. Notice is printed in the schedule book, posted on the website, and featured on rail cards in each bus. In all cases the Notice is printed in both English and Spanish.

To view a copy of RMTD's Title VI Notice to the Public see [Appendix B](#).

How to File a Complaint

RMTD has developed a procedure for investigating and tracking any Title VI complaints filed. Any person who believes that they, or any specific class of persons, has been subjected to discrimination or retaliation by RMTD'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 RMTD will first be screened by an RMTD Operations Manager. Verbal and non-written complaints received by RMTD shall be resolved informally by an RMTD Operations Manager. 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.

The RMTD Executive Director will be informed of any written Title VI complaint within 10 days of receipt of the complaint. Within 30 days of receipt of the complaint, the RMTD EEO/Title VI Officer will acknowledge receipt of the complaint and inform the complainant of proposed action to process the complaint.

Within 120 days of receipt of the complaint, the EEO /Title VI Officer will conduct and complete a full investigation of the complaint and provide a recommendation for action in a report of findings to the RMTD Executive Director.

Within 30 days of the completion of the full investigation, the RMTD Executive Director will notify the complainant in writing of the final decision. The notification will advise the complainant of their right to file a formal complaint with IDOT's Equal Opportunity Office if they are dissatisfied with the final decision rendered by RMTD. The RMTD EEO/Title VI Officer will also provide the Board of Trustees with a copy of this decision and summary of findings.

A person may also file a complaint directly with the Federal Transit Administration using their online complaint form: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>.

To view a copy of RMTD's Complaint Form please see [Appendix C](#). To view a full text copy of RMTD's Complaint Process please see [Appendix D](#).

Title VI Investigations

All FTA recipients are required to prepare and maintain a list of any complaints alleging discrimination on the basis of race, color, or national origin.

Title VI Equity Analysis

Under FTA Circular 4702.1B transit providers are required to conduct and submit a Title VI equity analysis if the provider has sited a new facility such as a vehicle storage facility, maintenance facility, operation center etc., with the exception of bus shelters and projects subject to the NEPA process. Since the date of the last Title VI submittal RMTD has undertaken a facility expansion and renovation project at its Administration, Operations, and Maintenance Facility located at 520 Mulberry Street. The FTA evaluated environmental review documents submitted by RMTD for the project and determined it met the criteria for a National Environmental Policy Act (NEPA) categorical exclusion in accordance with 23 CFR § 771.118(c)(9).

Additional Information

For a list of previous submittals and documents please see [Appendix E](#). For a list of special RMTD changes, improvements or efforts since the last Title VI program submittal, please see [Appendix F](#).

Chapter 5: Public Participation & Outreach

Rockford Mass Transit District (RMTD) is committed to providing meaningful access to services to all people, regardless of race, color, or national origin, English proficiency, or disability. RMTD has prepared several documents to help guide the agency in ensuring that the transportation planning process is open to everyone.

Public Participation Plan

RMTD's Public Participation Plan (PPP) outlines the strategies developed to disseminate information to the public on our transportation planning and programming processes, most specifically route and rate changes, in addition to projects, studies and plans, as well as gathering public feedback on these projects. RMTD recognizes that effective public involvement, with an emphasis on traditionally underserved populations, is critical to ensuring the best quality of service for all our patrons. Please see [Appendix G](#) for the full text Public Participation Plan. Please see [Appendix H](#) for all outreach efforts made since the last Title VI Program submission.

Limited English Proficiency Policy

The Rockford Mass Transit District recognizes in order to provide the best service to all our citizens, alternative provisions must be made for those with limited English proficiency. RMTD further defines passengers with limited English proficiency to be those individuals who meet the following criteria: English as second language, having a limited ability to internalize the English language, and having a disability prohibiting full usage and understanding of the English language. RMTD will work toward addressing the needs of these individuals based on the percentage of the population residing in our service area, the percentage of the population using public transportation, and Federal and/or State mandates and guidelines.

Typical measures will include but are not limited to providing translated documents, interpreters for RMTD public hearings and forums, and staff training for appropriate assistance. RMTD has developed a Limited English Proficiency Plan to provide a framework for this process. As a result of

this plan development, Census data has determined that it is necessary to provide Spanish translations of our vital documents as well as to have Spanish translators and sign language interpreters on hand for public meetings. With advanced notice similar accommodations can be made for additional languages. To view the full text RMTD Language Assistance Plan please see [Appendix I](#).

Additional Outreach Materials

To assure all potential paratransit patrons are aware of their rights to and the means of obtaining paratransit service, RMTD offers "Paratransit Guide to Ride 2025", which can be found on the RMTD website. This 20-page document consists of a description of the service, eligibility requirements, procedures for determining eligibility and making application, policies and procedures for scheduling rides, fares and other relevant information.



Chapter 6: System-Wide Service Standards and Policies

Title 49 CFR Section 21.5 requires that all fixed route providers of public transportation service shall:

- Not utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.
- Take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.

Additionally, Title 49 CFR Section 21.3 also ensures that:

- No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to route, quality of stations serving different routes, and location of route may not be determined on the basis of race, color, or national origin.

To ensure these conditions are being met, FTA’s Title VI Circular requires fixed-route providers to develop system-wide service standards and policies. Four quantitative service standards are required, included vehicle load, vehicle headway, on-time performance, and service availability.

Fixed-route providers must also adopt two service policies, including policies for vehicle assignment and distribution of transit amenities. These standards and policies will be monitored to ensure against disparate impacts and disproportionate burdens for minorities and low-income populations, as defined below.

- **Disparate impact:** A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would service the same

legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

- **Disproportionate burden:** A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden would require RMTD to evaluate alternatives and mitigate burdens where practicable.

Service Standards

The following service standards have been developed to ensure that every RMTD patron receives equitable quality and service across all routes.

Vehicle Load: The maximum passenger capacity of a bus before additional service is necessary, expressed as the ratio of passengers to the number of seats available. Vehicle load shall not exceed 1.5 during peak periods and 1.0 in off-peak periods (Table 6-1).

Table 6-1: Maximum Vehicle Load

Vehicle Type	Number of Seats	Target Peak Capacity Should Not Exceed	Target Non-Peak Capacity Should Not Exceed
35’ GILLIG	32	48	32
35’ GILLIG Hybrid	28	42	28
35’ GILLIG Battery Electric	28	42	28

Vehicle Headway: The length of time between bus departures for each route, demonstrating frequency of service. A shorter headway indicates more frequent bus service. Vehicle headways are determined based on ridership demand, service type, time of day, and day of the week. For weekday service, standard headways are 60 minutes for all routes. 30-minute headways may be implemented on high ridership routes where justified by demand.

On-Time Performance: A measure of service reliability.

Transit patrons rely on a reasonable guarantee that their bus will run as scheduled in order to accurately plan their trips. To be considered on-time, RMTD expects buses to arrive no more than five (5) minutes late. RMTD has established an objective that 90.0 percent or more of scheduled routes will run on-time.

Service Availability: A passenger's ability to access the public transit service. Transit service is generally designed to provide greater levels of accessibility to areas with higher population densities and concentrated commercial or service corridors. It is RMTD's policy that at least 90.0 percent of dwelling units in areas having six or more units per acre shall be located within ½ mile of a RMTD bus stop.

Service Policies

RMTD has developed the following policies to ensure that buses and transit amenities are equitably distributed across the system to deliver safe, comfortable, and convenient service to all transit customers.

Vehicle Assignment

Vehicles are assigned daily to a random rotation across all routes. All buses feature the same amenities: all fixed route buses kneel and are fully ADA compliant, are air conditioned, and have bike racks. All buses are closely inspected and maintained to ensure that all vehicles are in optimum operating condition.

Distribution of Transit Amenities

It shall be the goal of the District to place bus stop passenger shelters equitably throughout the fixed route system. Shelter locations will be determined by ridership data, general observation of conditions, and requests from transit patrons, city council members, and persons with disabilities where there is a strong demand and need for shelters.

RMTD's Bus Shelter Distribution Policy outlines a 10-point system to be used as a decision-making tool at the planning level to determine which bus stops will be prioritized for improvements when financial resources are available. These ranking criteria include:

- High boarding count or transfer location;
- Special needs — including senior centers, medical offices, persons with disabilities, etc.;
- Activity locations, including high densities of population, employment, commerce, or services;

- Exposure to elements – locations with no landscape or buildings to offer shade/ rain protection, no seat walls, no area to stand outside of sidewalk, and 2-3 lanes of traffic of 40 mph or more;
- Long waiting time for bus– stops at which patrons wait 30 minutes or more between buses; and/or
- Request for improvement – citizen requests improvements at stop.

If a bus stop meets the amenities criteria, it may be considered for a shelter or trash receptacle placement. Meeting these criteria does not guarantee shelter installation. Existing site conditions and pedestrian infrastructure, public right-of-way availability, accessibility and safety issues, and other concerns must be reviewed and addressed before future shelter placements are confirmed.

Bus stops that accumulate 10 points or more may be considered for shelter placement. Existing shelter locations shall be reviewed periodically and evaluated to determine if any should be removed or relocated.

All bus stops are clearly identified with a standard RMTD bus stop sign. Printed information, including route maps and schedule books, can be found at all transfer centers. Provision of digital information signage will be provided at all transfer centers.

All bus shelters feature seating for waiting patrons; however, RMTD does not provide standalone benches along its routes. Any bench located along its routes are sited and installed by the local municipality or adjacent property interest. Where needed or if requested, RMTD may install trash receptacles at major transfer points or shelters, or by entering into an agreement with an adjacent property interest.

Chapter 7: Monitoring Procedures and Efforts

Rockford Mass Transit District (RMTD) works closely with the Region 1 Planning Council (R1), acting as the Rockford Metropolitan Planning Organization (MPO), to ensure compliance with all Title VI requirements. R1 will monitor all planning efforts on behalf of RMTD to ensure that any purposed service or route changes and future developments will positively impact RMTD patrons, particularly those patrons whom constitute a minority population or disadvantaged class. RMTD will monitor the operational side of its activities to ensure that all patrons receive equal service regardless of race, color, or national origin. RMTD will monitor system-wide service standards and policies to further uphold compliance efforts.

On an annual basis, RMTD signs FTA's Certifications and Assurances which stipulates that RMTD agrees to assure compliance by any subrecipients, lessees, third party contractors, or any other participant involved in an FTA grant award with all Title VI requirements. A copy of the most recently approved Certifications and Assurances can be found in [Appendix J](#).

Process for Monitoring Subrecipient Compliance

RMTD historically has not acted as a primary recipient extending Federal financial assistance to subrecipients. Should RMTD ever extend Federal financial assistance to a subrecipient in the future, compliance will be monitored through the program management plan.

Role of Region 1 Planning Council

The Region 1 Planning Council (R1) is the federally designated Metropolitan Planning Organization (MPO) responsible for planning for the transportation needs of the Rockford Region. R1 is charged with the responsibility to direct, coordinate, and administer the continuing, comprehensive, and cooperative transportation process. R1's planning area includes the entirety of the RMTD service area.

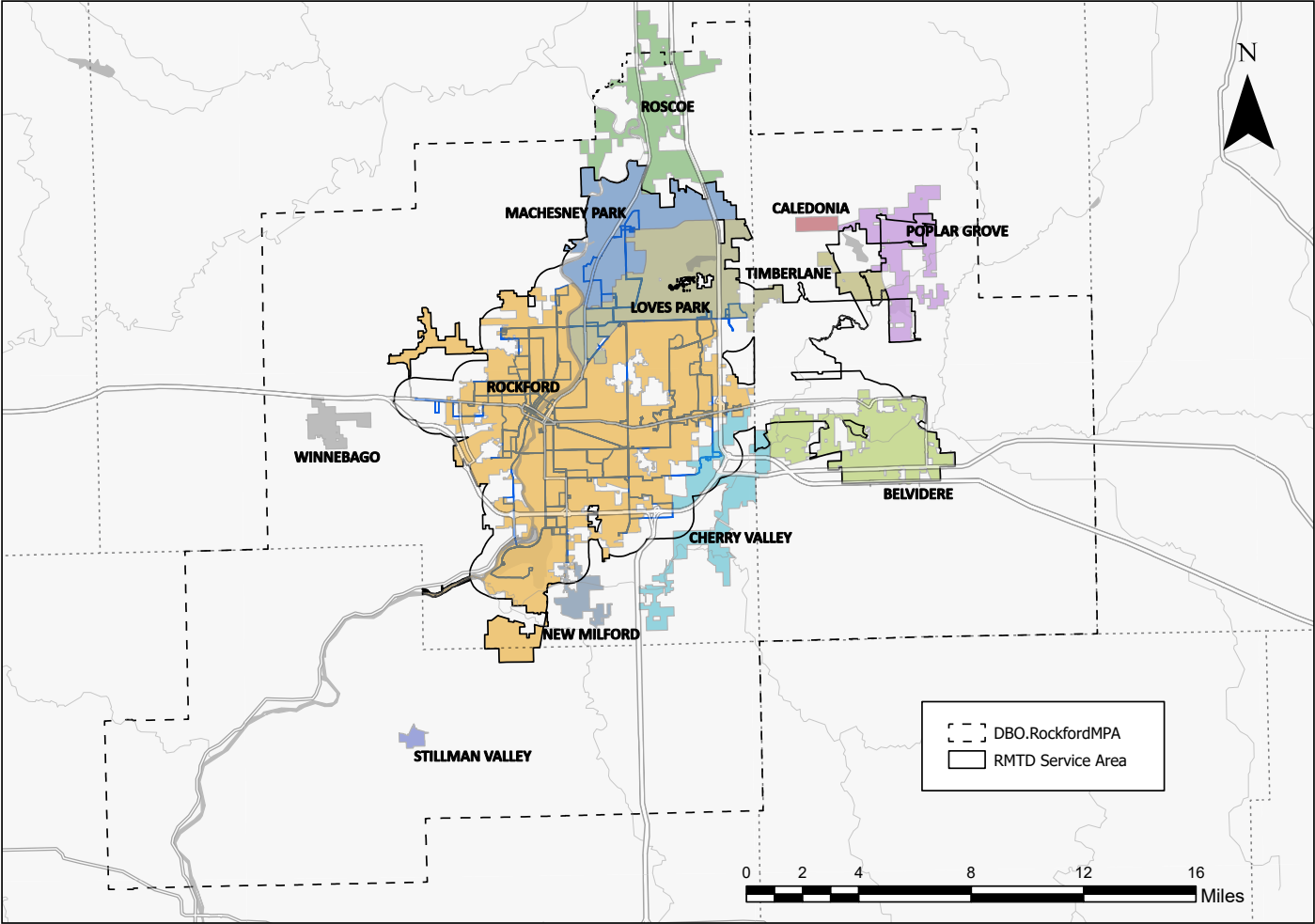
For decades, R1 has worked with transit providers in the region in the interest of preventing discrimination. R1 works closely with RMTD in the development of the annual Unified Planning Work Program and Transportation Improvement Program, and in the development of the Metropolitan Transportation Plan. RMTD notifies R1 of any and all proposed service changes and of pending financial considerations that might result in service changes. In 2009, a Memorandum of Understanding for Cooperative Transportation Planning was signed between R1's predecessor, the Rockford Metropolitan Agency for Planning, and the public transit agencies within its boundaries, including RMTD. The MOU includes that R1 will:

- 7.2.1 Assist the Public Transit Operators by periodically conducting a Title VI (Nondiscrimination) Assessment, in accordance with federal guidelines; and
- 7.2.2 R1 will assist the Public Transit Operators by providing information that can be used to support visualizations, assist in the decision making and transportation planning process, and aid in public participation for transportation planning.

R1 takes a comprehensive approach to monitoring population trends across the region. R1 assembles detailed census data to track demographic trends. In addition to census data, R1 develops detailed dwelling unit and employment forecasts encompassing Boone, Winnebago, and Ogle Counties, in addition to Rock County in Wisconsin.

Building and demolition permits are closely monitored to help determine the location and quantities of dwelling unit changes throughout the area. Longitudinal employment dynamics are closely studied to determine the employment locations of minority and low income groups in relation to their place of residence to help identify key transportation linkages. The R1 MPO planning area boundary in relation to RMTD's service area is illustrated in Figure 7-1.

Figure 7-1: RMTD Service area and R1 Planning Area Boundaries Map



Source: Region 1 Planning Council

Chapter 8: Service Area Demographics

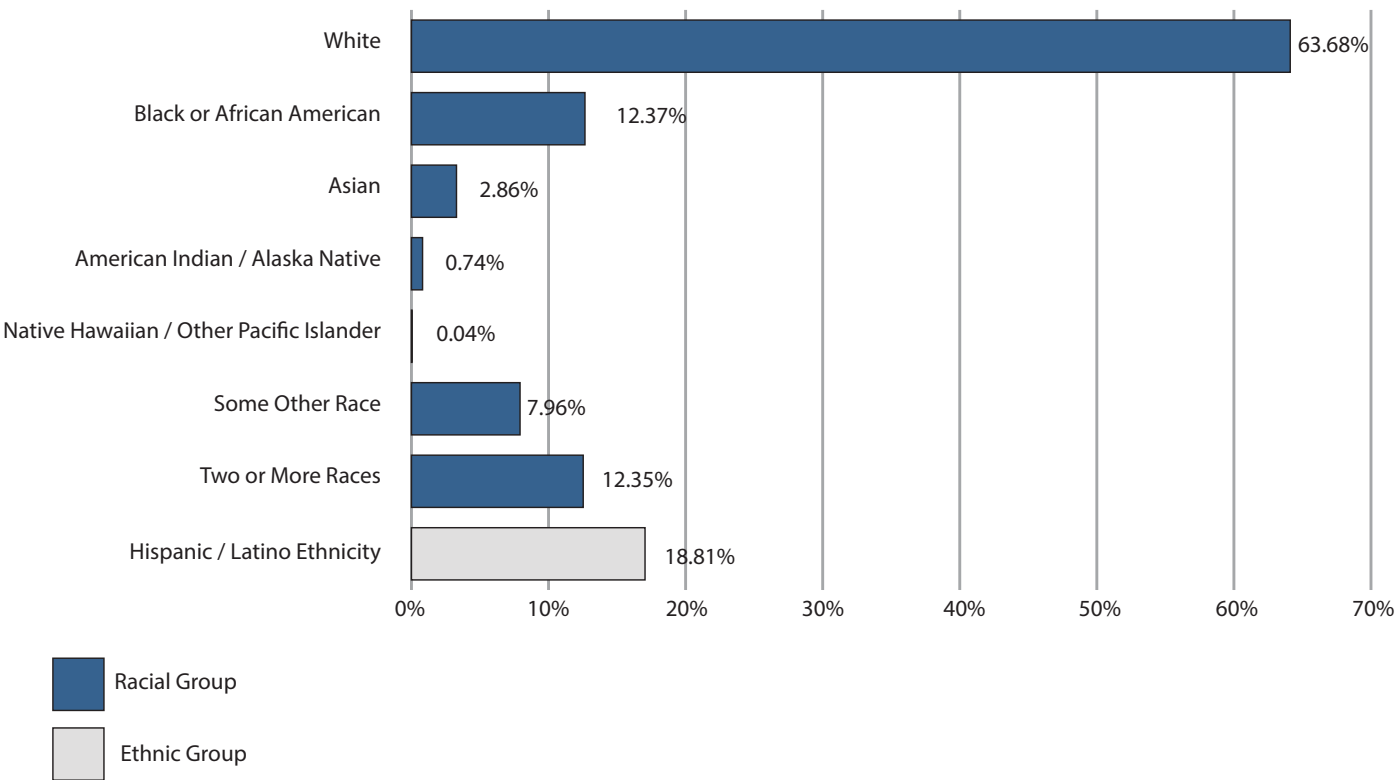
While not required for a fixed route provider of RMTD’s size, R1 and RMTD have compiled a collection of data applicable to the Title VI Program to guide future planning. An understanding of RMTD’s service area demographics is needed to ensure that transportation planning and outreach efforts reach all parts of the population.

The following demographic sections include summaries for age, language, vehicle accessibility, income, race and ethnicity in RMTD’s service area. The data used in this evaluation will be updated as new data becomes available.

Demographic Profile

According to 2020-2024 American Community Survey (ACS) 5-year estimates, 281,885 people reside within the RMTD service area, with racial minorities comprising 36.6 percent of the population. The largest racial minority group is Black or African American at 12.37 percent, while Hispanic or Latino ethnicity represents the largest minority group at 18.81 percent of the population. A detailed breakdown of racial and ethnic populations within the service area can be found in Figure 8-1.

Figure 8-1: Select Racial and Ethnic Percent of Total Population 2024 (ACS 5-year estimates)

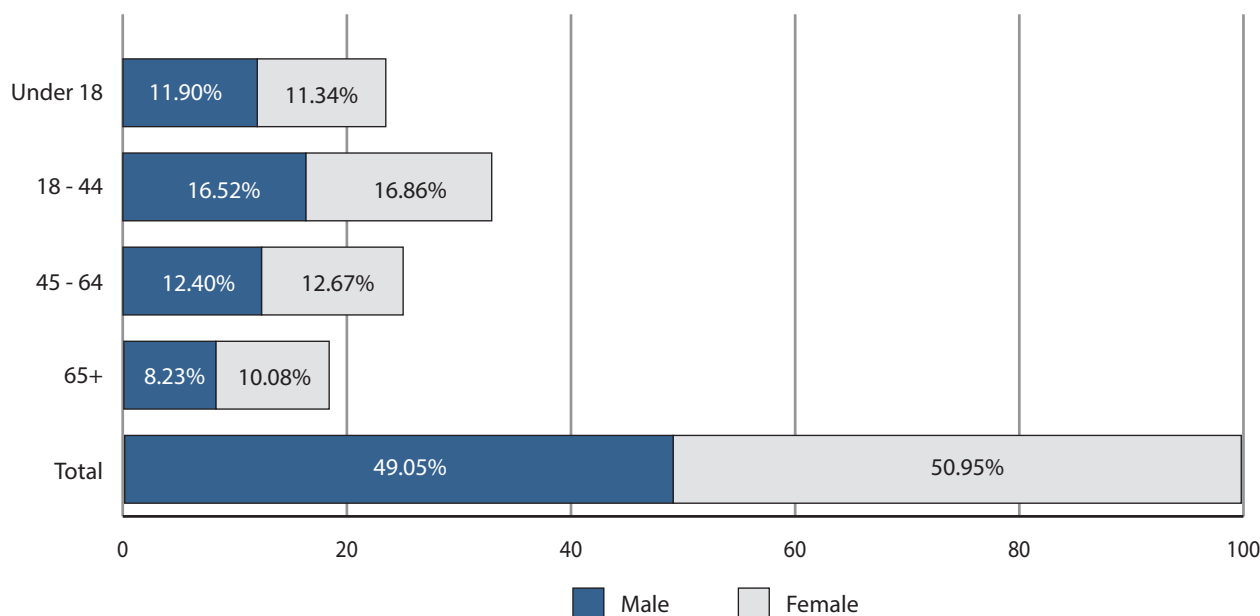


Dot-density maps depicting the geographic distribution of population groups within RMTD’s service area can be found in [Appendix K](#). In general, the greatest density of residents reside in the vicinity of the Urban Core, well serviced by the centralized Downtown Transfer Center.

Youths under 18 years of age compose just over 23 percent of the RMTD service area, while working age adults (18-64) make up 58.45 percent. The remaining 18.31 percent of residents living in the service area are over the age of 65. The male to female ratio remains close with 50.95 percent of service area residents identifying as female and 49.05 percent identifying as male. A detailed breakdown of ages group populations within the service area can be found in Figure 8-2.

According to the ACS 5 year estimates, 21.3 percent of Rockford residents live in poverty, although this figure is likley to be lower for the wider RMTD service area, as this includes more affluent suburban communities.

Figure 8-2: Age Group Breakdown



Appendix A: RMTD Board of Trustees Title VI Approval Resolution

Figure A-1: Resolution Document



p 815-961-9000 520 Mulberry St. rmtd.org →
f 815-961-9892 Rockford, IL 61101

Resolution No. R-26-04

Resolution authorizing adoption of the 2027-2029 Rockford Mass Transit District Title VI Program and Environmental Justice Assessment.

WHEREAS, The Rockford Mass Transit District is a recipient of the Federal revenues and is required to meet federal regulatory requirements for the Title VI, established by 49 CFR part 21.7; and

WHEREAS, The Rockford Mass Transit District assures that no person or group of persons on the basis of race, color, or national origin, including limited English proficient persons are subjected to discrimination in the level and quality of transportation services, programs and activities provided, whether federally funded or not; and

WHEREAS, The Rockford Mass Transit District assures that all residents and visitors of the Rockford region are afforded meaningful access to our programs, activities and services; and

WHEREAS, The Rockford Mass Transit District developed an updated Title VI Program and Environmental Justice Assessment that meets the requirements of FTA Circular 4702.1B and FTA Circular 4703.1.

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BOARD OF THE ROCKFORD MASS TRANSIT DISTRICT:

That the 2027-2029 Rockford Mass Transit District Title VI Program and Environmental Justice Assessment presented within is hereby adopted.

PRESENT and ADOPTED the 28th day of September 2026

A handwritten signature in blue ink, appearing to read 'Pastor Herbert Johnson', written over a horizontal line.

Pastor Herbert Johnson, Chairman

The undersigned duly qualified Secretary of the Rockford Mass Transit District certifies that the foregoing is true and correct copy of a Resolution adopted at a legally convened meeting of the Rockford Mass Transit District Board of Trustees.

A handwritten signature in blue ink, appearing to read 'Ashley Sarver', written over a horizontal line.

Ashley Sarver, Secretary/Treasurer

Appendix B: Title VI Notice to the Public

Rockford Mass Transit District Title VI

The Rockford Mass Transit District (RMTD) hereby gives public notice that it is the policy of the District to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice and related statutes and regulations in all programs and activities.

Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which RMTD receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Rockford Mass Transit District. Any such complaint must be in writing and filed with the RMTD Administrative Office within 180 days following the date of the alleged discriminatory occurrence.

More information on RMTD's Title VI Policy can be found at <https://rmtd.org/about-us/title-vi/> or by contacting RMTD directly at 815-961-9000.

Rockford Transporte Público Distrito Título VI

El Distrito de Tránsito Masivo Rockford (RMTD) decide da aviso público de que es la política del Distrito para asegurar el pleno cumplimiento con el Título VI del Acta de Derechos Civiles de 1964, la Ley de Derechos Civiles de Restauración de 1987, la Orden Ejecutiva 12898 sobre justicia ambiental y estatutos y reglamentos en todos los programas y actividades.

Título VI establece que ninguna persona en los Estados Unidos de América, por motivos de raza, color, sexo u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser sujeto de otro modo a discriminación bajo cualquier programa o la actividad para la cual RMTD recibe ayuda financiera federal. Cualquier persona que cree que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI tiene el derecho de presentar una queja formal con el Distrito de Transporte Masivo Rockford. Cualquier queja debe ser por escrito y presentada en la Oficina Administrativa RMTD dentro de los 180 días siguientes a la fecha de la supuesta ocurrencia discriminatorio.

Puede encontrar más información sobre la política del Título VI de RMTD en <https://rmtd.org/about-us/title-vi/> o comunicándose directamente con RMTD al 815-961-9000

Appendix C: Title VI Complaint Form

Figure C-1: Complaint Form Page 1

TITLE VI COMPLAINT FORM

Background

Title VI is a Federal statute and provides that no person 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. Title VI prohibits recipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance.

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			
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.			

Figure C-2: Complaint Form Page 2

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
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:		
Contact person:		
Title:		
Telephone number:		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date _____

Please submit this form in person at the address below, or mail this form to:

Rockford Mass Transit District
201 North Winnebago St
Rockford, IL 61103

Appendix D: Title VI Discrimination Complaint Procedure

Rockford Mass Transit District

Title VI Discrimination Complaint Procedure

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, the Rockford Mass Transit District (RMTD) has in place the following complaint procedure.

1. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by RMTD'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 the RMTD shall be screened by an Operations Manager. Complaints deemed to be Title VI in scope will be immediately referred to the RMTD Equal Employment Opportunity (EEO)/Title VI Officer. Written complaints shall be sent to:

Rockford Mass Transit District
201 N. Winnebago St. Rockford, IL 61103

2. Verbal and non-written complaints received by RMTD shall be resolved informally by the RMTD Operations Supervisor. If they involve a Title VI issue, they will be shared with the EEO/Title VI Officer. 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.

3. The RMTD EEO/Title VI Officer will advise the RMTD 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:
 - a. Name, address, and phone number of the complaint
 - b. Name, address, and phone number of RMTD
 - c. Basis of complaint
 - d. Date of alleged discriminatory act(s)
 - e. Date complaint received by RMTD
 - 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 RMTD had taken or proposed to resolve the allegations(s) raised in the complaint.
4. Within thirty (30) calendar days of receipt of the complaint(s), the RMTD EEO/Title VI Officer will acknowledge receipt of the complaint(s), inform the complainant of proposed action to process the complaint(s) and advise the complainant of other avenues of redress available, such as the Illinois Department of Transportation (IDOT) or directly to the RMTD Board of Trustees.
5. Within one-hundred twenty (120) calendar days of receipt of the complaint(s), the EEO/Title VI Officer will conduct and complete a full investigation of the complaint(s) and, based on the information obtained, will render a recommendation for the action in a report of findings to the RMTD Executive Director.
6. Within thirty (30) calendar days of the completion of the full investigation (one-hundred fifty (150) calendar days since the original receipt of the complaint(s), the RMTD Executive Director 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 EEO if they are dissatisfied

with the final decision rendered by RMTD. The RMTD EEO Officer will also provide the Board of Trustees with a copy of this decision and summary of findings. If the RMTD Executive Director is unable to come to a final decision within the available time period, the Executive Director will refer the matter to the RMTD Board of Trustees and notify the complainant of this action in writing.

7. The RMTD EEO/Title VI Officer 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 RMTD has taken or proposed to resolve the issue raised in the complaint

8. A person may also file a complaint directly with the Federal Transit Administration at:

FTA Office of Civil Rights 1200 New Jersey Avenue SE
Washington, D.C. 20590 <https://www.transit.dot.>

Appendix E: Previous Submittals and Documents

This submittal is prepared pursuant to guidance from the U.S. Department of Transportation as provided in Circular 4702.1B of the Federal Transit Administration (FTA). This submittal updates and supplements the following previously-prepared documents:

1. The report entitled, “Rockford Mass Transit District Title VI Program & Environmental Justice Assessment”, March 2004, as prepared by Region 1 Planning Council (R1).
2. The report entitled, “Title VI & Environmental Justice of the Public Transit Services provided by the Rockford Mass Transit District in the Rockford Urbanized Area”, March 2004, as prepared by Rockford Area Transportation Study (RATS).
3. The letter dated March 29, 2007, regarding “Title VI and Environmental Justice Assessment for the Rockford Mass Transit District” addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Gary McIntyre (RATS).
4. The letter dated March 27, 2008, regarding “Title VI and Environmental Justice Update for the Rockford Mass Transit District Reporting Requirements”, addressed to Dwight B. Sinks, Civil Rights Officer, US DOT /Federal Transit Administration / Region V, from Jon Paul Dipla (RATS)
5. The letter dated June 20, 2011, regarding “Title VI and Environmental Justice for the Rockford Mass Transit District Status Report”, addressed to Donald Allen, Civil Rights Officer, US DOT/Federal Transit Administration / Region V, from Jon Paul Dipla, Rockford Metropolitan Agency for Planning (RMAP)
6. The report entitled, “Title VI Program And Environmental Justice Assessment 2014-2017” provided by the Rockford Mass Transit District in the Rockford Urbanized Area, March 2014, as prepared by RMAP.
7. The report entitled “Title VI Program and Environmental Justice Assessment 2018-2020” provided by Rockford Mass Transit District in the Rockford Urbanized Area, June 2017, as prepared by RMAP.
8. The report entitled “Title VI Program and Environmental Justice Assessment 2021-2023” provided by Rockford Mass Transit District in the Rockford Urbanized Area, June 2023, as prepared by Region 1 Transportation Council.
9. The report entitled “Title VI Program and Environmental Justice Assessment 2024-2026” provided by Rockford Mass Transit District in the Rockford Urbanized Area, June 2023, as prepared by Region 1 Transportation Council.

Appendix F: Recent Special RMTD Changes, Improvements or Efforts

RMTD is engaged in or planning a number of activities aimed at improving transit service throughout the Rockford area. These include:

1. **RMTD embraces sustainability for the health of our community.**

Rockford Mass Transit District is committed to the environment and enhancing the quality of life in its community. That's why RMTD has embraced environmentally sustainable practices whenever financially feasible. In recent years, RMTD has taken bold strides toward reducing greenhouse gas emissions and increasing energy efficiency with its fleet, its facilities, its operations and its staff.

RMTD introduced 12 more hybrid electric buses between 2023 and 2026, making a total of 27 hybrid and six battery electric buses in its fleet. The state-of-the-art buses, purchased from Gillig Corporation, an American company based in Hayward, California, will replace RMTD's aging fleet.

The hybrid electric buses reduce fuel consumption by 25.0 percent and emissions by 90.0 percent. They are cleaner and quieter than diesel buses. Additionally, using geo-fencing technology, the new hybrid buses can be programmed to engage full-electric mode when entering carbon and noise-sensitive areas such as downtown or narrow neighborhood roadways. This helps reduce noise pollution and further improve quality of life for the people we serve.

2. **Software/hardware updates.**

RMTD implemented a new paratransit/demand response dispatching and scheduling software (TripSpark). The new system provides scheduling confirmations and trip arrival information via phone, text and email. Additionally, customers have access to a customer portal where they can schedule trips on their own in the system.

3. **Service Hours.**

Over the past three years, RMTD has made several improvements to service hours to provide better access to employment, educational, medical, and

leisure opportunities. In 2024, RMTD introduced extended service to employment facilities such as Amazon, UPS, and the Rockford Airport. In addition, it extended weeknight service to Javon Bea Hospital. In 2025, RMTD increased frequency on weekday routes that serve the West and Northwest Sides of Rockford, increased evening service, and added an additional hour to morning and evening service. This included 30-minute frequency from RMTD's Downtown Transfer Center to a Walmart at Northridge. Along with that change, RMTD implemented increased access to the senior citizen home of Wesley Willows, Rockford Public Schools' elementary school Thurdgood Marshall, and a resource center for adults with intellectual disabilities named Milestone. In 2026, RMTD continued its efforts by increasing service to food sources like the grocery store Aldi. RMTD also added six trips on one of its existing routes to serve Lowe's distribution center, providing better access to their employees. These changes are part of RMTD's ongoing efforts to improve access to education, employment, grocery stores, and recreational opportunities throughout the community.

4. **New fare options: RMTD has added several new fare options described below.**

The City of Rockford and the Rockford Mass Transit District announced that beginning February 01, 2025, any individual in the community enrolled in a local post-secondary education program or in a local adult General Educational Development (GED)/High School Equivalency (HSE) program will be able to ride RMTD's fixed route service for free. RMTD executes this by accepting student ID's that are provide by the institution as a pass to ride, for programs or educational institutions who may not provide students with identification, RMTD provides them with 30-day passes monthly.

Appendix G: Rockford Mass Transit District Public Participation Plan

When the Rockford Mass Transit District embarks on significant changes to its system, a diligent effort is made on the part of the District to include all riders and interested parties. A “major” service change would be defined as an increase or decrease of service or a fare increase of 25 percent or more.

If a significant change that impacts passengers and other interested parties is proposed, Rockford Mass Transit District (RMTD), will adhere to the following procedure:

1. A series of public hearings will be held. An advertisement will be published in the local newspaper at least 30 days prior to holding public hearings. The public hearing will also be posted to the District’s web site, RMTD.org and other key locations on the RMTD property at least 30 days prior to the event. The 30-day notice may be reduced if prior approval is given by the RMTD Board of Trustees. The advertisement will be published again the day of the public hearing.

The advertisements are complete and inform the public of the exact change(s) that are going to be recommended. The advertisement will state that the RMTD will accept written views, exhibits and other pertinent information until the date of the public hearings. Additionally, the advertisement will also state that the District will provide an interpreter for those with hearing impairments and/or those with limited English proficiencies if RMTD is notified up to 48 hours to the event. If notification is not given and interpreters are needed, RMTD will provide a written, translated version of the hearing to the individual within 1 week after the hearing.

The District will also consider utilizing other forms of media for communicating changes and meetings related to the proposed changes including radio interview, paid advertising on television and the newspaper and through social media avenues.

2. It is its policy to hold a minimum of two (2) public hearings- one in the daytime and another one in the evening for whoever cannot attend in the daytime.

The public hearings must be held at a location accessible by RMTD’s Fixed Route Service as well as the Paratransit Service. The location must also be ADA accessible.

A variety of locations are recommended for use including libraries, schools, churches and ethnic or neighborhood community centers.

3. Any written and/or oral comments are taken at the public hearings and are entered into the public hearing transcripts.

All written views, exhibits and other pertinent information received by the District, from the date of the advertisement until the date of the public hearings, will also be incorporated into the public hearing transcripts.

4. During the development of the Public Involvement Plan and/or planning for public engagement in general, RMTD will incorporate strategies outlined in its Limited English Proficiency Plan to promote involvement of minority and LEP individuals in the public participation process. To that end, in addition to providing Spanish interpreters and/or sign language interpreters, we will also promote the public hearing in targeted ethnic publications, attend community group meetings and events of neighborhood associations, faith-based organizations, advocacy groups and other groups to solicit feedback from diverse members of the public.
5. A FORM OP-8: NOTIFICATION OF SERVICE CHANGE must be submitted to the Illinois Department of Transportation (IDOT).
6. RMTD staff may consult FTA Circular 4703.1 (Environmental Justice Policy Guidelines for Federal Transit Recipients) for additional strategies that may be incorporated into the Public Involvement Plan.

Appendix H: Public Outreach Made Since The Last Title VI Program Submission

Table H-1: Public Outreach

Date	Time	Description	Location
03/22/24	3:30PM	FY '25 Budget	RMTD, 520 Mulberry St
08/12/24	4:00PM	Fall Service Improvements	RMTD, 520 Mulberry St
03/31/25	3:30PM	FY '26 Budget	RMTD, 520 Mulberry St
07/29/25	8:00AM	Fall Service Improvements	RMTD, 520 Mulberry St
07/30/25	8:00AM	Fall Service Improvements	725 N Lyford Rd
03/26/26	3:00PM	FY '27 Budget	RMTD, 201 N Winnebago St

Appendix I: Rockford Mass Transit District Limited English Proficiency Plan 2026

Introduction

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 “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 agencies such as Rockford Mass Transit District, (RMTD) and governments, private and non- profit entities, and subrecipients.

Plan Summary

Rockford Mass Transit District (RMTD) has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to RMTD services as

required by Executive Order 13166. 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, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining RMTD’s extent of obligation to provide LEP services, RMTD 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 RMTD’s service area who may be served or likely to encounter an RMTD program, activity, or service;
2. The frequency with which LEP individuals come in contact with RMTD services;
3. The nature and importance of the program, activity or service provided by RMTD to the LEP population;
4. The resources available to RMTD 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 in RMTD’s service area who may be served or likely to encounter an RMTD program, activity, or service.** According to the US Census Bureau American Community Survey 2020-2024 5-year estimates, approximately 50,632 (16 percent) residents within the Rockford MSA ages 5 and older speak a language other than English. The largest non-English speaking group is Spanish at 36,166 residents (11.5 percent), and of this population, 12,720 (35.2 percent) of the Spanish speaking residents speak English less than “very well”.

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

RMTD assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries, and verbally surveying drivers and Transfer Center staff. Since the last RMTD public participation meetings, RMTD has had zero requests for an interpreter. At the last public hearing for the introduction of a new pass program there were also no requests for interpreters. RMTD does provide the basic schedule booklet and Paratransit Guide to Ride in Spanish. RMTD also offers these materials in English in a Braille format, large print, and audio. RMTD has a translation button on its website, thus making information available in a multitude of languages. All significant changes along with day to day information are posted on this site, www.rmtd.org.

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

Statistically, the Asian and Pacific Island Languages in the Rockford MSA have the highest proportion of individuals who speak English less than “very well” (42.7 percent), followed by Spanish speakers at 35.2 percent and Other Indo-European speakers at 28.4 percent. RMTD’s service is important to the community and therefore RMTD makes every effort to reach out to all LEP riders. Rockford has several community outreach organizations that work with the LEP population and through our very strong ties with RAMP, Catholic Charities, Rockford Public Schools, and Rockford Park District, along with our promotional efforts as available through various broadcast programs, RMTD conveys services and strives to educate this population.

4. **The resources available to RMTD and overall costs RMTD assessed its available resources that could be used for providing LEP assistance.**

This includes identifying how much a professional interpreter and translation service would cost on as needed basis, which documents would be the most valuable to be translated if and when the populations support, taking an inventory of available organizations that RMTD could partner with for outreach and translation efforts, and what level of staff training is needed.

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

Limited English Proficiency Plan Outline

How to Identify an LEP Person Who Needs Language Assistance

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 RMTD hosts a public hearing or community forum, RMTD will request that if a language interpreter and/or a Sign Language interpreter is needed, advise RMTD up to 48 hours prior to the event. If notified, necessary arrangements for an interpreter to be at the public hearings will be made. If not notified, RMTD will provide translated materials to the party within 1 week after the hearing.
- Have the Census Bureau’s “I Speak Cards” at the hearings or forums sign in table. While the staff may not be able to provide immediate interpreter services beyond Spanish which will be on hand, materials can subsequently be translated and distributed accordingly and input monitored for growing population trends.
- RMTD will also make available a Spanish version of all relevant worksheets and handouts at all RMTD forums and public hearings.
- Survey drivers and other front line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

Language Assistance Measures:

RMTD has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least “well,” and the lack of resources available in the RMTD service area:

- Census Bureau’s “I Speak Cards” are to be located at the Customer Service window in the Transit Center at all times.

- The computer(s) located at the Transfer Center and Info Line will have Google translate added to the favorites listing for easy access via browser for the translations of blocks of texts. This will aid the RMTD staff in the interpretation of services on a one-on-one basis for LEP individuals visiting the Transit Center or administrative office.
- When the RMTD website is redesigned as necessary.
- When an interpreter is needed, in person or on the telephone, and RMTD staff has exhausted the above options; staff will first attempt to determine what language is required. Staff shall use the contracted telephone interpreter service, whose information has been provided to applicable personnel.

RMTD Staff Training

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

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services RMTD offers;
- Use of LEP “I Speak Cards”;
- How to use the interpretation and translation services;
- Staff is educated and familiar with using Google translate and the translate button on rmtd.org;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint; and
- Staff is directed to keep a log of translation requests.

Outreach Techniques

The following are few options the RMTD will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, as stated above, a Spanish interpreter and sign language interpreter will always be made available if notified prior to the meeting. Otherwise translated materials

will be made available within 7 days after the meeting. RMTD will monitor for other LEP demographic trends and provide services as needed.

- Key print materials, including schedules, maps and rider’s guides, will be translated and made available at the RMTD Transfer Center, onboard vehicles and in communities where a specific and concentrated LEP population is identified.

Monitoring and Updating the LEP Plan:

This plan is designed to be flexible and is one that can be easily updated. At a minimum, RMTD 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 RMTD service 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 RMTD programs? Are there other programs that should be included?
- Have RMTD’s available resources, such as technology, staff, and financial costs changed?
- Has RMTD fulfilled the goals of the LEP Plan? and
- Were any complaints received?

Dissemination of the RMTD Limited English Proficiency Plan

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the RMTD Marketing Department.

RMTD Marketing & Public Relations Specialist,
Orlando K. Toatley

201 N. Winnebago St. Rockford, IL 61103

Phone: 815-961-2226 | Email: otoatley@rmtd.org

Exhibit 1 - Language Data Source

Table I-1: Language Spoken at Home

Subject - Language Spoken at Home	Illinois Estimate	Illinois Percent	Rockford MSA Estimate	Rockford MSA Percent
Population 5 years and over	12,055,041	-	315,458	94.1%
English Only	9,101,368	75.50%	264,826	84%
Language other than English	2,953,673	24.50%	50,632	16%
Speak English less than very well	1,117,203	9.3%	17,500	34.6%
Spanish	1,702,816	14.1%	36,166	11.5%
Speak English less than very well	679,251	39.9%	12,720	35.2%
Other Indo-European languages	693,838	5.8%	6,212	2.0%
Speak English less than very well	235,839	34.0%	1,766	28.4%
Asian and Pacific Island languages	395,960	3.3%	4,461	1.4%
Speak English less than very well	156,224	39.5%	1,905	42.7%
Other languages	161,059	1.3%	3,793	1.2%
Speak English less than very well	45,889	28.5%	1,109	29.2%

Exhibit 2 - Limited English Proficiency Policy 2013

RMTD recognizes that in order to provide the best service to all its citizens, alternative provisions need to be made for those with limited English proficiency. RMTD further defines passengers with limited English proficiency to be those individuals who meet the following criteria:

- English is a second language;
- Having a limited ability to internalize the English language;
- Having a disability prohibiting full usage and understanding of the English language;

Those individuals meeting the above criteria in our community will be identified by current Census data as outlined in [Appendix I](#).

RMTD will work toward addressing the needs of these individuals based on the percentage of the population residing in the service area, the percentage of the population using public transportation and Federal and/or State mandates and guidelines. Typical measures will include but are not limited to providing translated documents, interpreters for RMTD public hearings if requested, and forums and staff training for appropriate assistance.

RMTD will employ all resources available to the District within a fair and reasonable cost to provide tools for

individuals with limited English proficiency.

Exhibit 3 - Limited English Proficiency Complaint Policy

All complaints received by RMTD will first be screened by an RMTD Operations Manager. Verbal and non-written complaints received by RMTD shall be resolved informally by an RMTD Operations Manager. 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. The RMTD Executive Director will be informed of any written complaint within 10 days of receipt of the complaint. Within 30 days of receipt of the complaint, the RMTD EEO/Title VI Officer will acknowledge receipt of the complaint and inform the complainant of proposed action to process the complaint. Within 120 days of receipt of the complaint, the EEO Officer will conduct and complete a full investigation of the complaint and provide a recommendation for action in a report of findings to the RMTD Executive Director. Within 30 days of the completion of the full investigation, the RMTD Executive Director will notify the complainant in writing of the final decision. The notification will advise the complainant of their right to file a formal complaint with IDOT's Equal Opportunity Office if they are dissatisfied with the final decision rendered by RMTD. The RMTD EEO/Title VI Officer will also provide the Board of Trustees with a copy of this decision and summary of findings.

Appendix J: Certifications

The following pages contain the most recently signed copy of the Rockford Mass Transit District's Certifications and Assurances to the Federal Transit Administration for the 2026 fiscal year.

Figure J-1: Certifications Document Page 1

FEDERAL FISCAL YEAR 2026 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISANCE PROGRAMS

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of Applicant: Rockford Mass Transit District

BY SIGNING BELOW, on behalf of Rockford Mass Transit District, I declare that Rockford Mass Transit District has duly authorized me to make these Certifications and Assurances and bind Rockford Mass Transit District's compliance. Thus, Rockford Mass Transit District agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or Rockford Mass Transit District's behalf continues to represent it.

The Certifications and Assurances Rockford Mass Transit District selects apply to each Award for which Rockford Mass Transit District now seeks, or may seek in the future, of federal assistance to be awarded by FTA during the federal fiscal year.

Rockford Mass Transit District affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of Rockford Mass Transit District are true and accurate.

Signature 
Name Ricardo Montoya Picozo, Vice Chairman of the Board
Authorized Representative of Rockford Mass Transit District

Date: April 27, 2026

AFFIRMATION OF APPLICANT'S ATTORNEY

For: ROCKFORD MASS TRANSIT DISTRICT

As the undersigned Attorney for Rockford Mass Transit District, I hereby affirm Rockford Mass Transit District has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on Rockford Mass Transit District.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature 
Name Timothy J. Rollins, Attorney
Attorney for Rockford Mass Transit District

Date: April 27, 2026

I, Timothy J. Rollins, Legal Counsel for RMTD, authorize Michael J. Stubbe, RMTD Executive Director, to PIN my signature in the FTA TrAMS program for the FY 2026 Affirmation of Applicant's Attorney above.


Timothy J. Rollins, Attorney

CERT AND ASSURANCE FFY 2026

Figure J-2: Certifications Document Page 2

**FEDERAL FISCAL YEAR 2026 CERTIFICATIONS AND ASSURANCES FOR
FTA ASSISTANCE PROGRAMS**

Name of Applicant: Rockford Mass Transit District

The Applicant certifies to the applicable provisions of all categories:

X.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01. Certifications and Assurances Required of Every Applicant	
02. Public Transportation Agency Safety Plans	
03. Tax Liability and Felony Convictions	
04. Private Sector Protections	
05. Transit Asset Management Plan	
06. Rolling Stock Buy America Reviews and Bus Testing	
07. Urbanized Area Formula Grants Programs	
08. Formula Grants for Rural Areas	
09. Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	
10. Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	
11. Enhanced Mobility of Seniors and Individuals with Disabilities Programs	
12. State of Good Repair Grants	
13. Infrastructure Finance Programs	
14. Alcohol and Controlled Substances Testing	
15. Rail Safety Training and Oversight	
16. Demand Responsive Service	
17. Interest and Financing Costs	
18. Cybersecurity Certification for Rail Rolling Stock and Operations	
19. Tribal Transit Programs	
20. Emergency Relief Program	

Appendix K: Title VI Population Density Maps

Figure K-1: Total Population Map

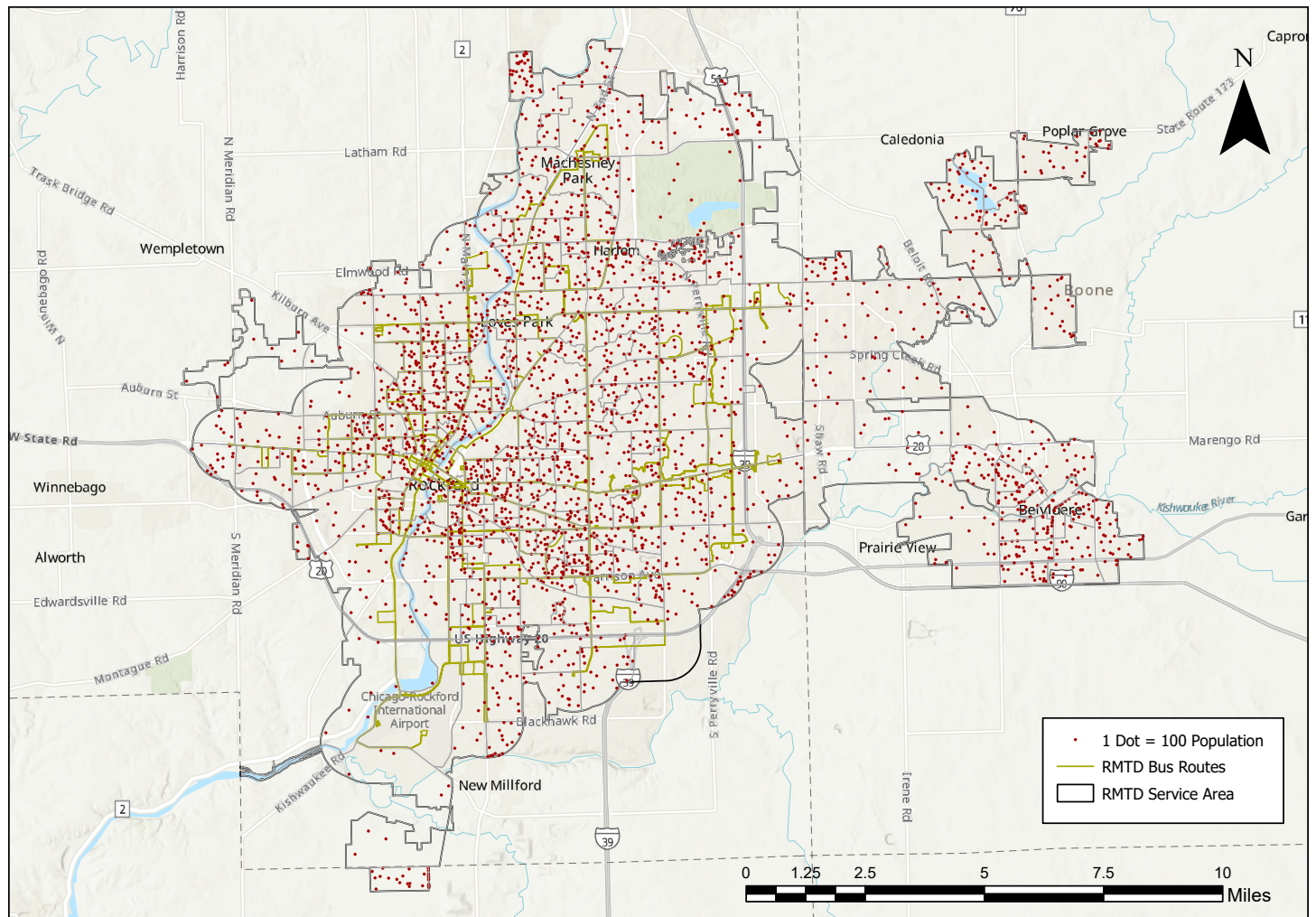


Figure K-2: Total Minority Population Map

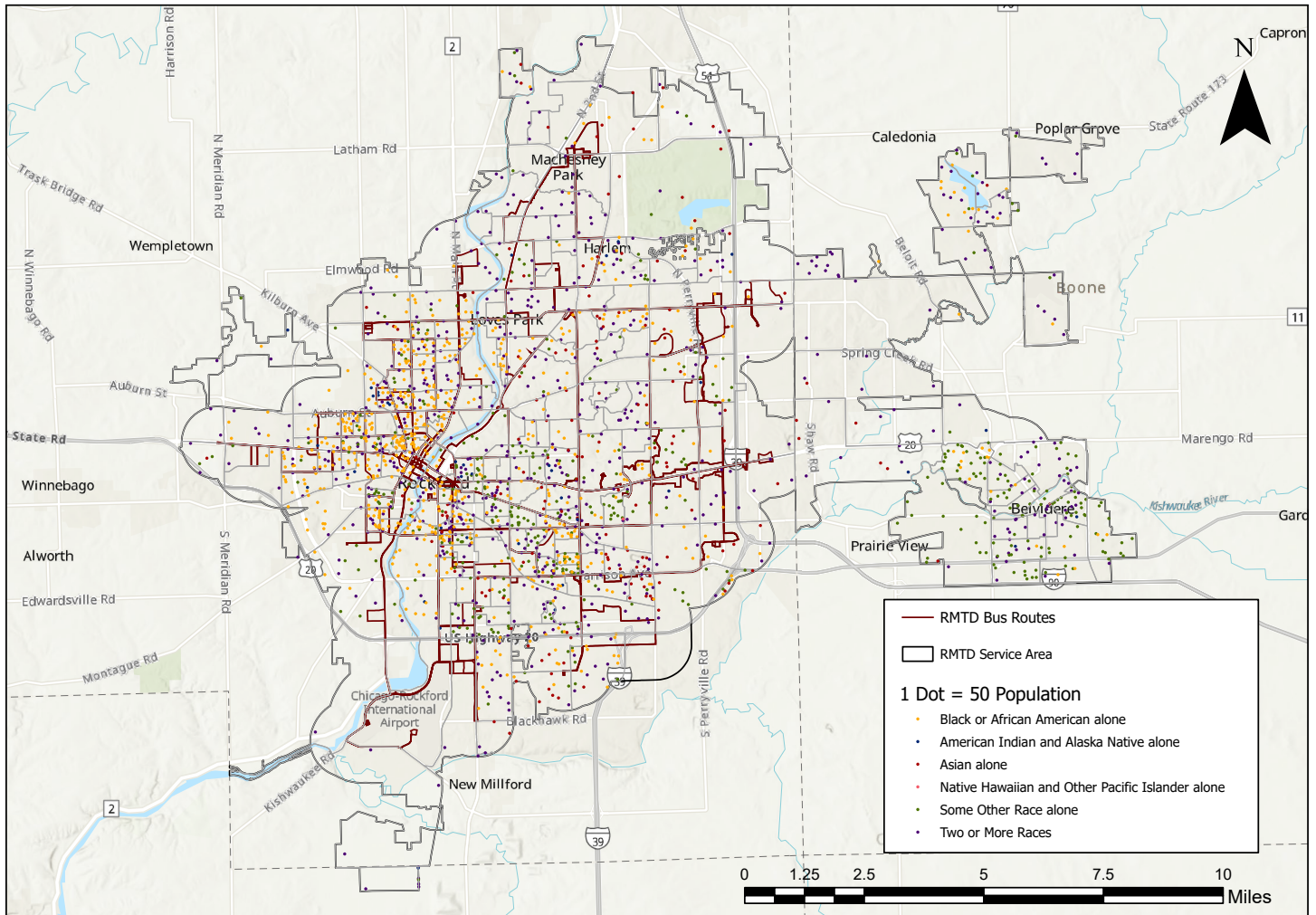


Figure K-3: Black or African American Population Map

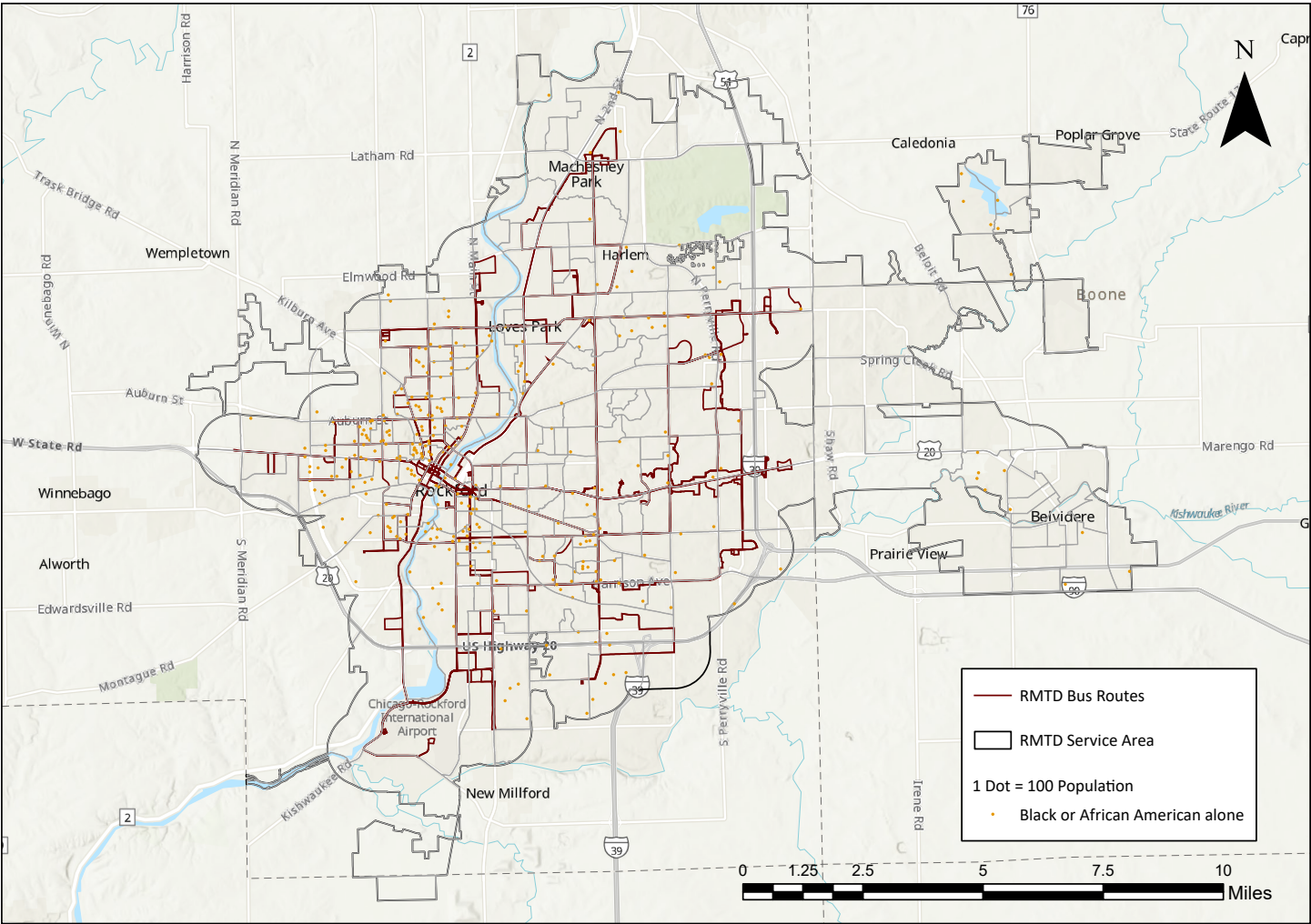


Figure K-4: Hispanic or Latino Population Map

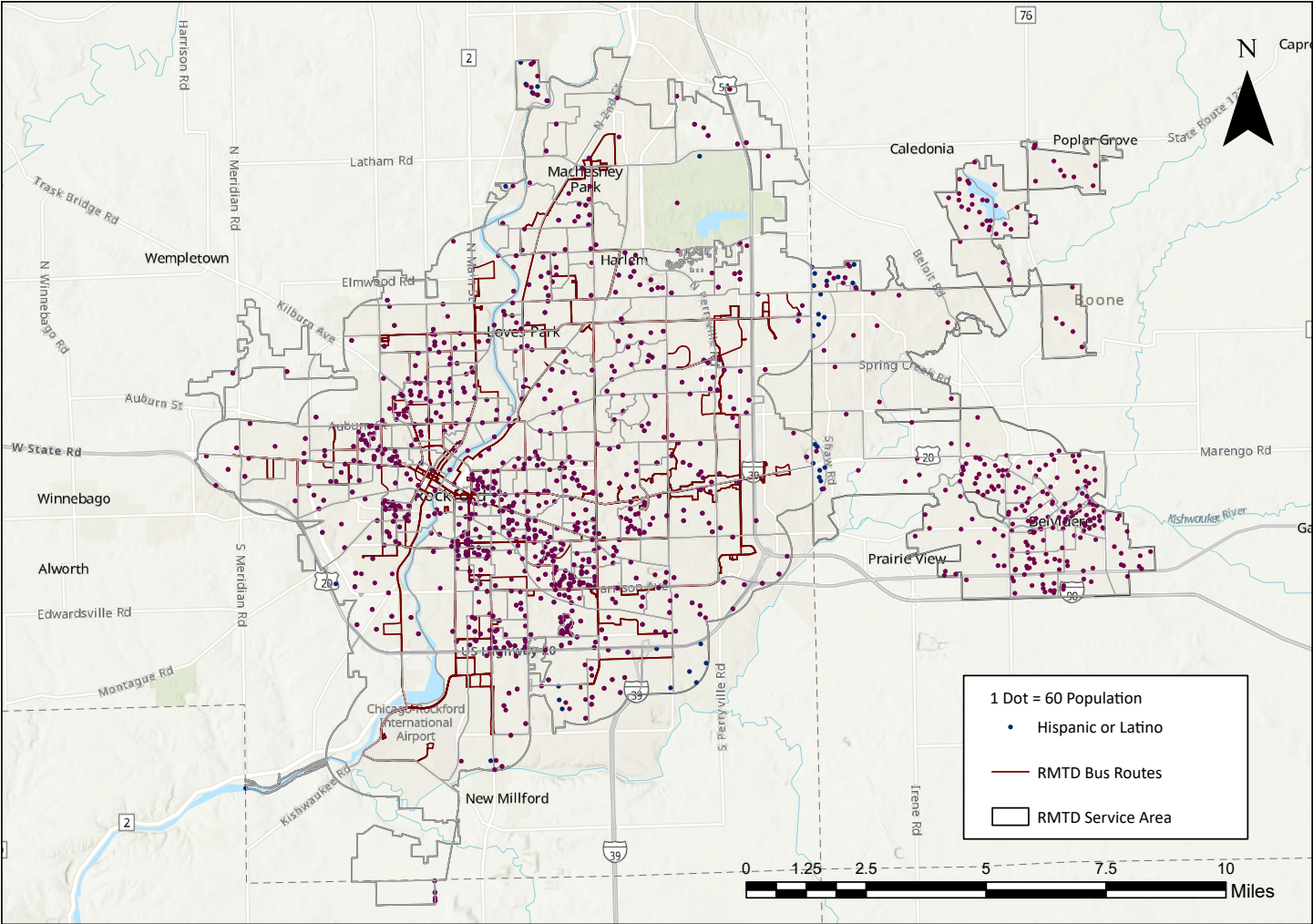


Figure K-5 Asian Population Map

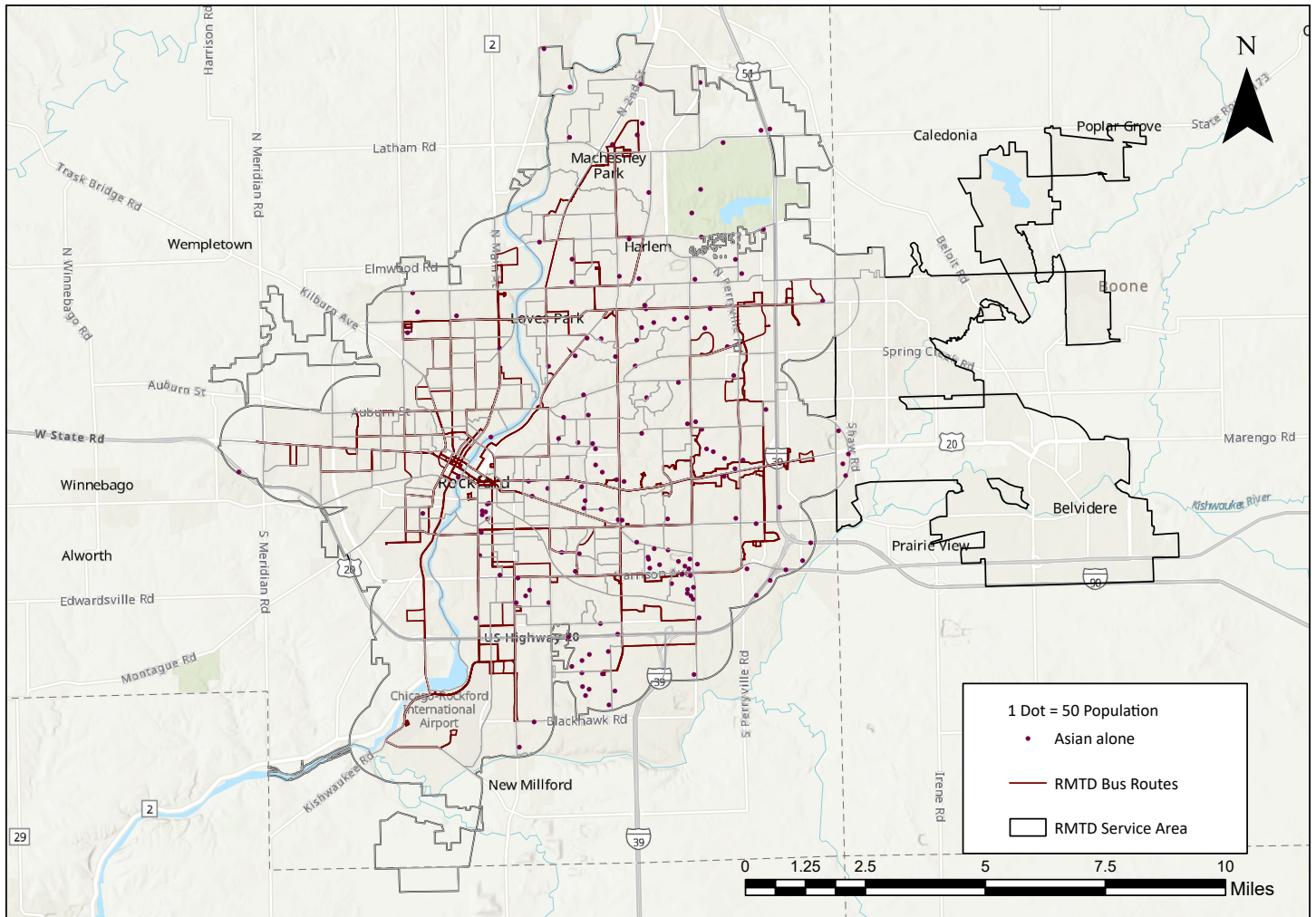


Figure K-6: American Indian and Alaska Native Population Map

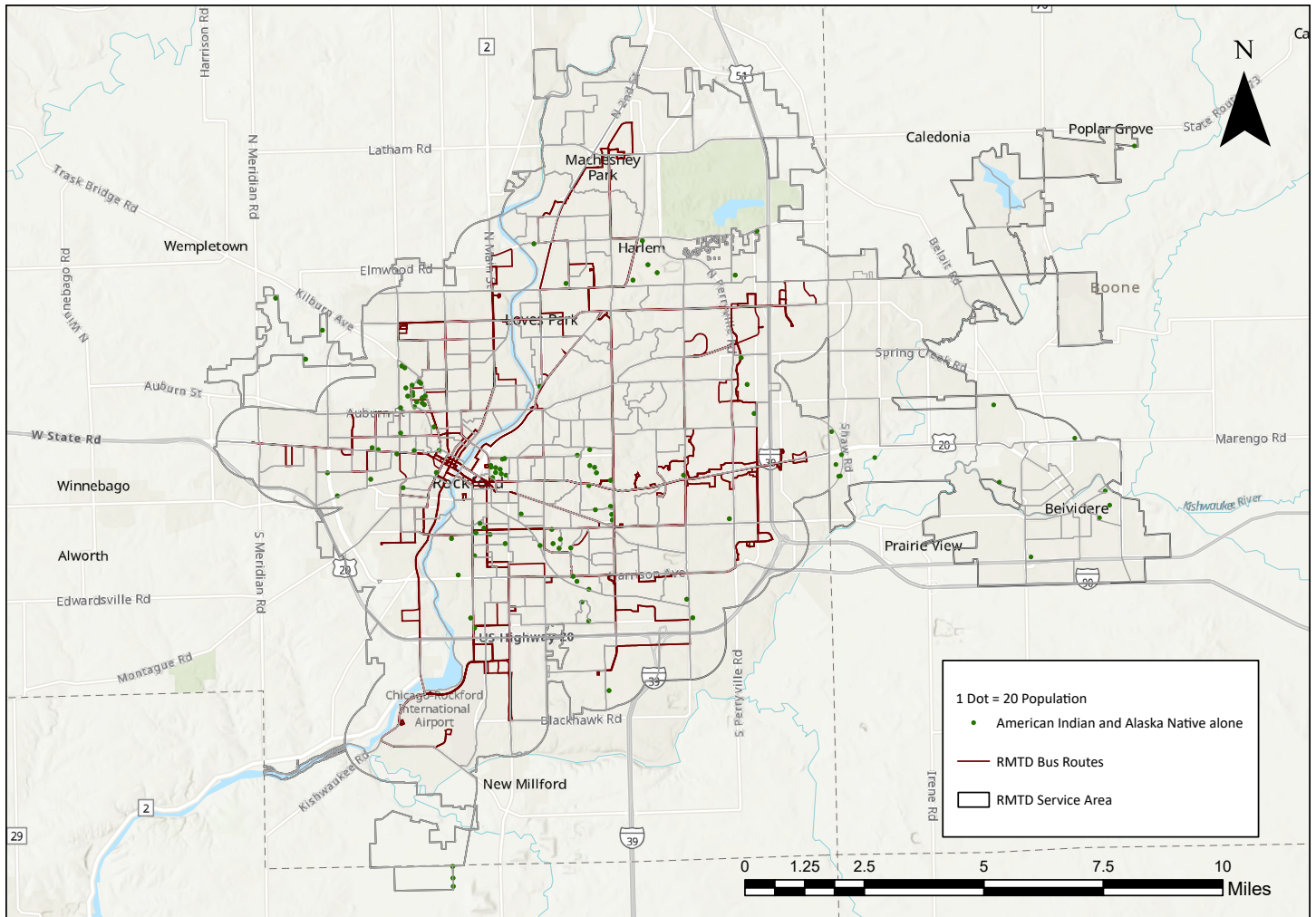


Figure K-7: Native Hawaiian and Other Pacific Islander Population Map

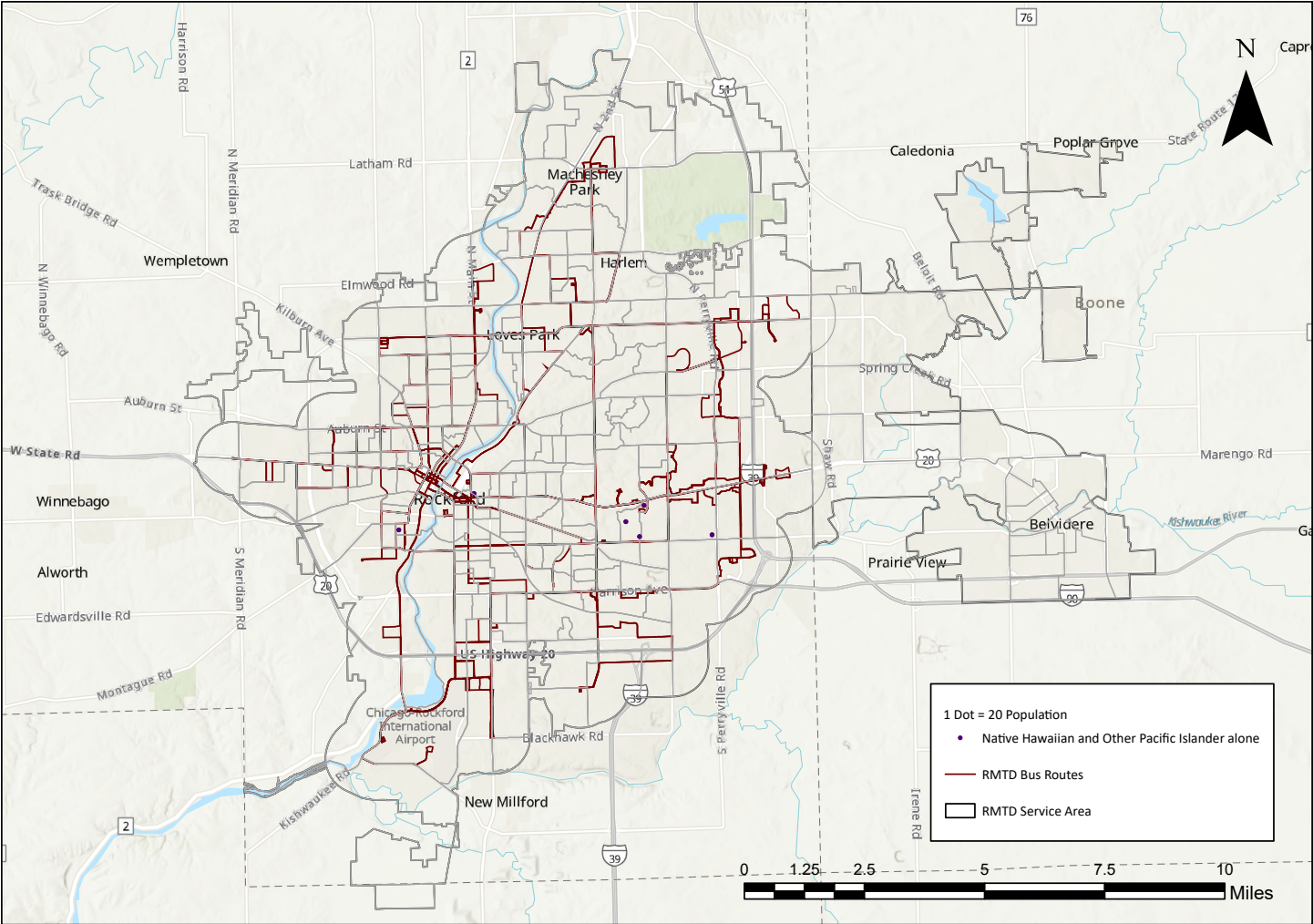


Figure K-8: Some Other Race Population Map

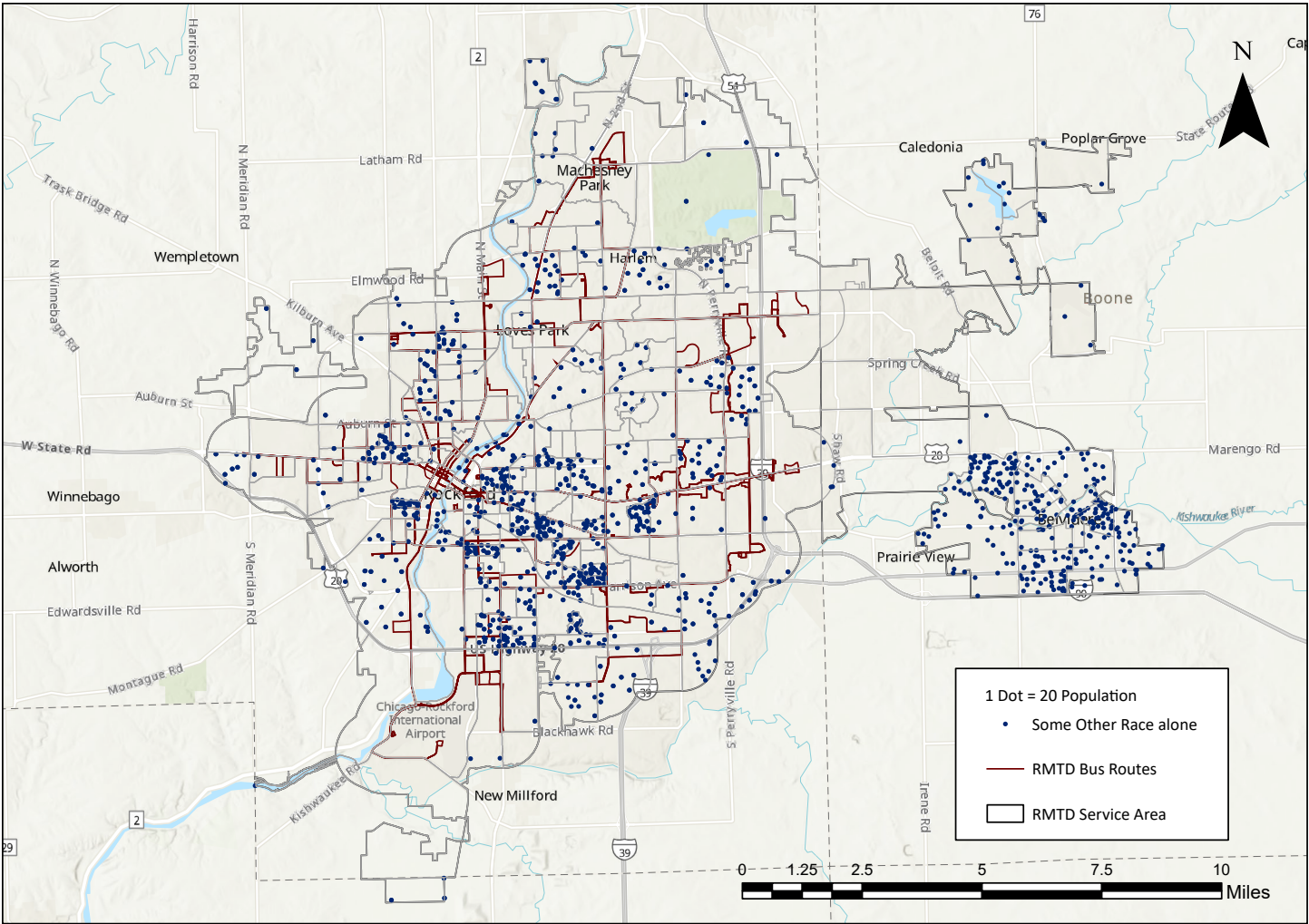
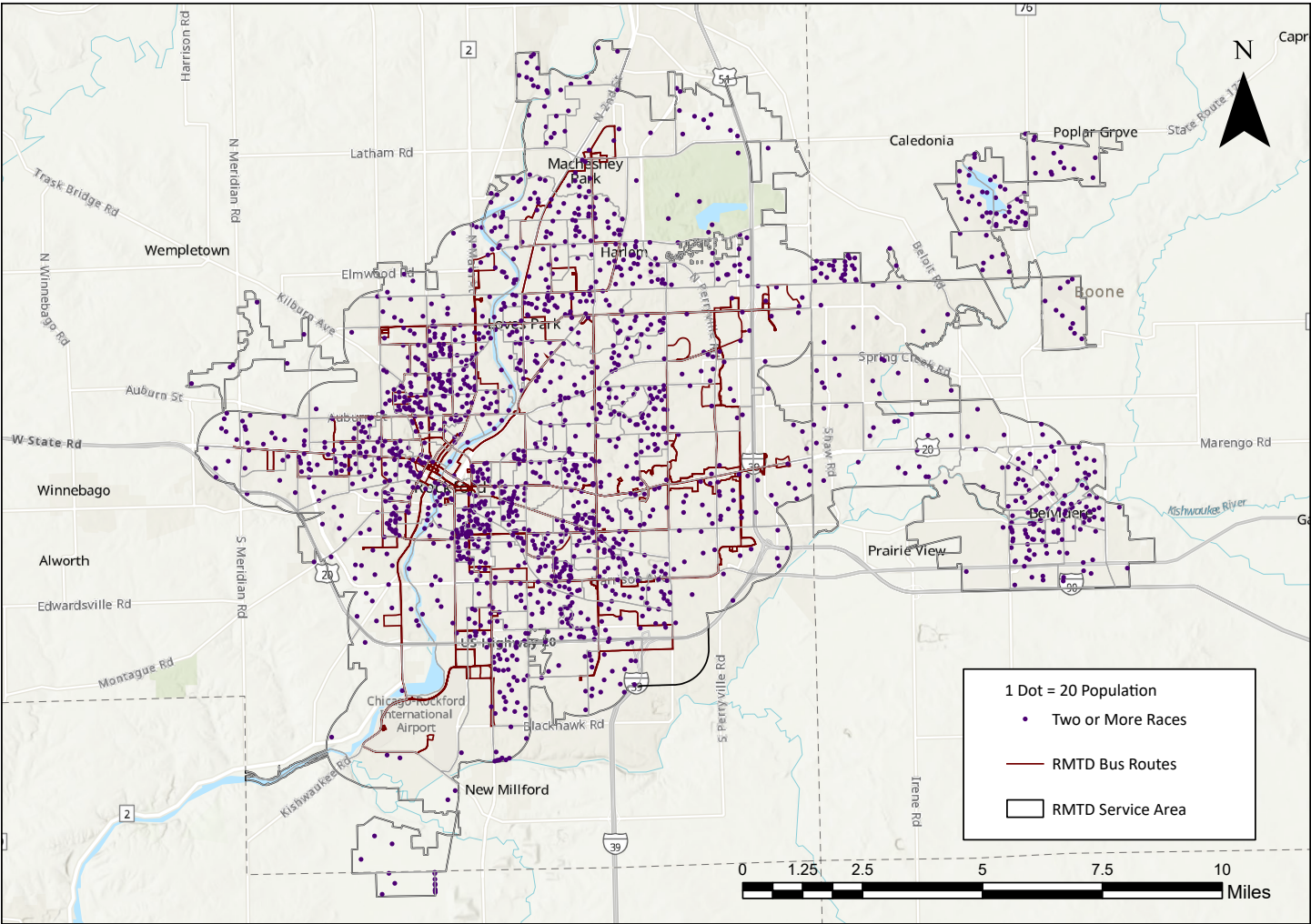


Figure K-9: Two or More Race Population Map





Rockford Mass Transit District

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