



# Rockford Mass Transit District

## Title VI Program & Environmental Justice Assessment

2024-2026



Final Report  
July 2023

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## Final Report 7.24.2023

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

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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 and Environmental Justice

On February 11th, 1994 President Clinton issued Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations.” Environmental Justice (EJ) builds on to Title VI activities by considering the impacts to low-income populations, in addition to minority populations, into transportation planning and decision-making processes.

FTA released two separate Circulars in 2012, FTA 4702.1B which outlines Title VI requirements and FTA 4703.1 with EJ 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 its Title VI considerations and assessment.

# Chapter 2

## Definitions



Below are several definitions applicable to this Title VI Program, found in [Chapter I 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 The Rockford Mass Transit District

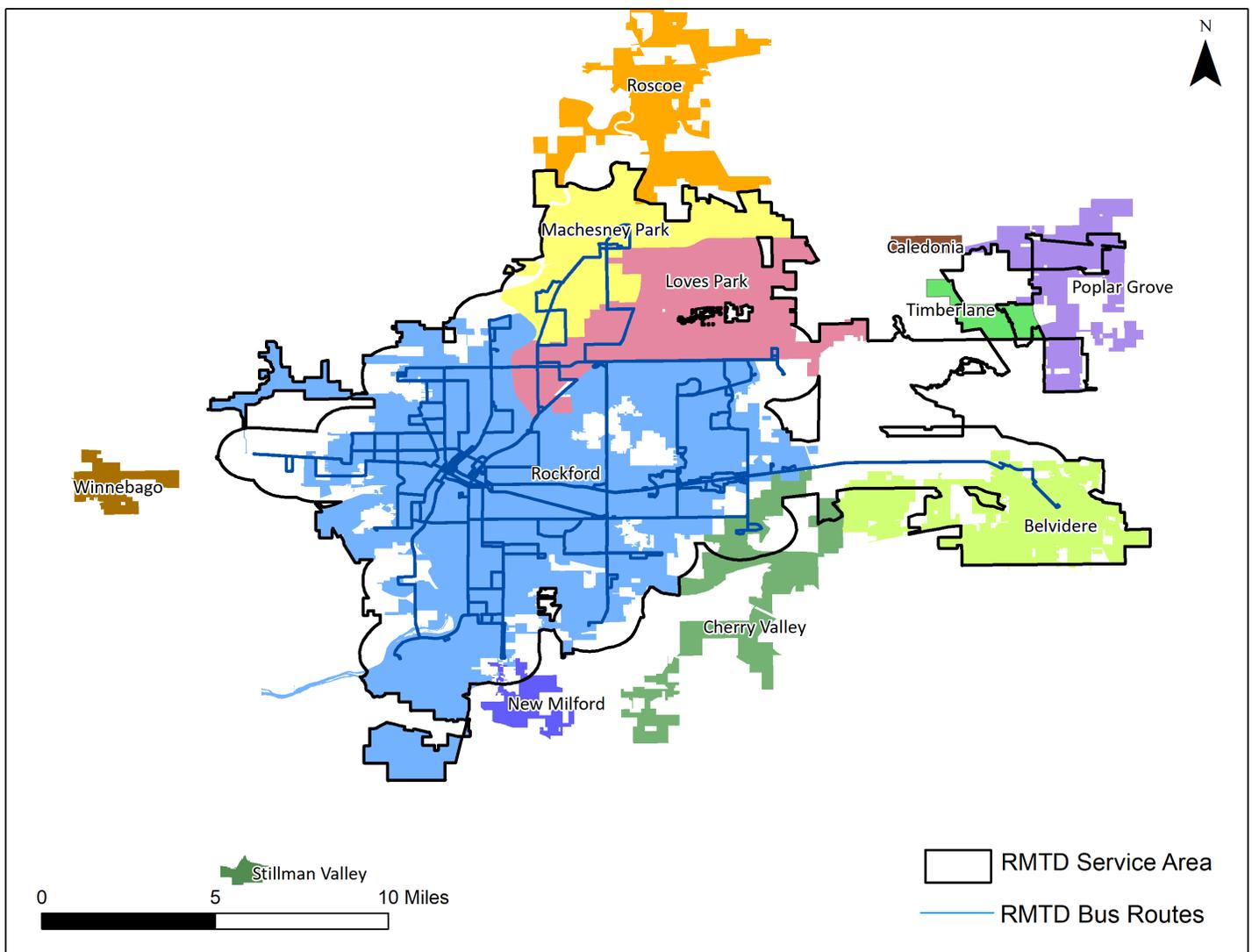
Rockford Mass Transit District (RMTD) is dedicated to providing safe, efficient, affordable, dependable, and accessible transportation to the residents of Rockford and the surrounding area. For over 50 years, RMTD has provided federally- subsidized and coordinated, fixed-route transit services for the Rockford Urbanized Area.

RMTD provides fixed-route and complementary origin-destination paratransit services within Rockford, Loves Park, Machesney Park, and Belvidere, and subcontracts with 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. Additionally, service to and around CherryVale Mall, in the Village of Cherry Valley, is provided during regular operating periods for an additional zone fare. RMTD's service area covers approximately 150 square miles and an estimated 281,713 residents<sup>1</sup>, with an annual ridership of 767,276 passengers in 2022. RMTD's requires service area and applicable municipalities are illustrated in Figure 3-1.

<sup>1</sup> Population estimates are based on 2017-2021 American Community Survey Census Block Groups that touch the RMTD Service Area, and do not represent an exact figure.

**Figure 3-1:** Map of RMTD Service Area Map



# Fixed Route Service

RMTD operates 19 daily fixed-routes (Monday-Saturday), six (6) weeknight routes, and five (5) 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, and Machesney Park on Saturdays, and select areas in Rockford 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. Each fixed-route bus has a 12-year replacement schedule, with the entire fleet expected to be replaced or in the process of being replaced by 2025. Currently, RMTD has 20 diesels buses, 15 hybrid-electric buses, and 6 battery electric buses.

Most fixed routes run at 60-minute headways. Exceptions include School Street and East State routes which run every 30 minutes, and Huffman and Kilburn routes which run every 90 minutes. RMTD is currently implementing recommendations from a Comprehensive Mobility Analysis for its service area, which will increase span of service and hours of operation over the next several years. RMTD has added an electronic ticket purchase option and cashless payment options through the Token Transit app. This app can be downloaded for free 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

Summary Statistics	
Service Area	150 Sq. Miles
Service Population	281,713
Number of Fixed Routes	19
Fixed Route Bus Fleet	41
Buses in Peak Service	24
Paratransit Fleet	33

# Paratransit and Demand Response Services

In addition to fixed-route transit services, RMTD provides complementary origin-destination paratransit service at a minimum three-quarters of a mile from the 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, and Machesney Park.

Service is provided daily in Rockford and six days a week in Loves Park and Machesney Park. Hours of operation for paratransit service are the same as those of fixed-route service. Although weeknight fixed-route service is only available in Rockford, complementary 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 with 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 South Beloit, Rockton, and Roscoe, which lay adjacent to the northern portion of RMTD’s service area.

RMTD’s demand response fleet is comprised of 33 medium and super-medium duty transit buses (13 diesels and 20 gasoline), each with a state or federally defined useful life of five (5) to nine (9) years. As with the fixed-route buses, RMTD is expected to begin replacing this fleet with alternative-fuel options by 2028 based on vehicle useful life with the goal of fully transitioning the demand response fleet to alternative-fuel zero emission by 2036. With the 2036 goal in mind, over the next several years RMTD will determine a specific course of action for replacing its gasoline and diesel-powered demand response fleet with a zero-emission fleet.

**Table 3-2:** RMTD Fare Prices

Cash Fare	
Children Under 5 (must be accompanied by an adult)	FREE
Children (ages 5 thru 11)- without Student School ID or RMTD Student ID card	\$0.75
Students, Grades K-12 with School ID or RMTD Student ID Card	FREE
Adults (18 years & older) without a reduced fare ID	\$1.50
Disabled Citizens (with valid RMTD photo ID)*	\$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
* Any person with a Medicare Card can qualify for reduced fare service on the RMTD system.	

Ticket Fare	
Adult Single Ride	\$1.50
Adult Ten Ride Tickets	\$15.00
Disabled Citizens (with valid RMTD photo ID)	\$0.75
Disabled Citizen Ten-Ride Ticket (with valid RMTD photo ID)	\$7.50

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**Table 3-2:** RMTD Fare Prices *Continued*

Ticket Fare	
All Day Unlimited Ride Saver Pass	\$3.00
All Day Unlimited Ride Half Fare Saver Pass (with valid RMTD photo ID)	\$1.50
7 Day Unlimited Ride Saver Pass	\$16.00
30 Day Unlimited Ride Saver Pass	\$55.00
30 Day Unlimited access "U-Pass" (Eligible students must be enrolled in an area post-secondary education program and have a valid school issued ID)	\$27.00

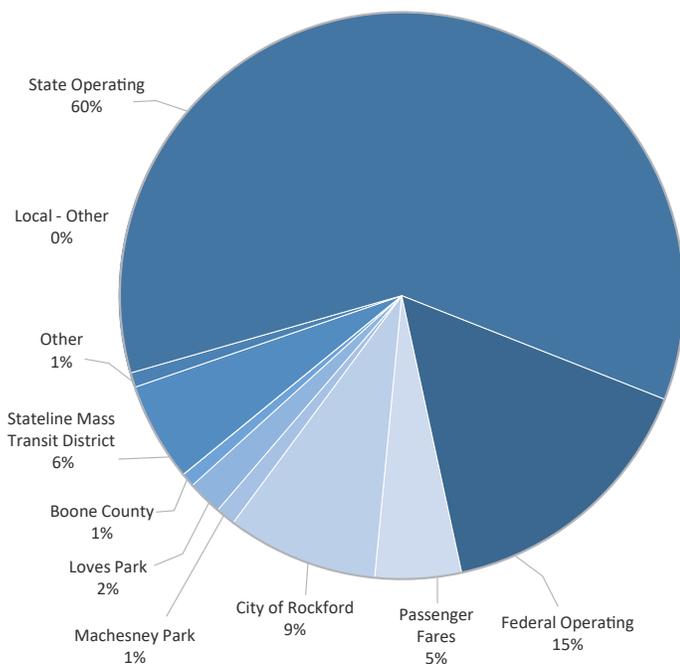
  

Zone Fare	
Any passenger boarding or alighting the #19 CherryVale route will be asked to pay the additional \$0.25 Zone Fare. Bus passes not accepted in Zone Fare.	

## 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 the buses, and other small funding sources. A breakdown of the 2022 operating revenues, contractual service payments, and subsidies needed to provide service are displayed in Figure 3-2. State operating accounts for 60.0 percent of 2022 operating revenues, followed by federal operating at 15.0 percent. Passenger fares make up just 5.0 percent of 2022 operating revenues at \$998,062. 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:** 2022 Operating Revenues



## 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 RMTD 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. There are no other transit-related, non-elected planning boards, advisory councils or committees, or similar committees, where the membership of which is selected by RMTD.

RMTD is also an active participant of the Region 1 Planning Council (R1) Livable Communities Forum, 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	73%	33%
Black or African American	14%	66%
Asian	3%	0%
American Indian/Alaskan Native	>1%	0%
Pacific Islander/ Native Hawaiian	>1%	0%
Some Other Race	4%	0%
Two or More Races	6%	0%
Hispanic/Latino Ethnicity	17%	0%

## 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 its patrons.

The following Title VI program was approved by the Rockford Mass Transit District Board of Directors on July 24, 2023. 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 the RMTD Operations Manager. Verbal and non-written complaints received by RMTD shall be resolved informally by the 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 Equal Employment Opportunity (EEO) 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 RMTD 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 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 its online complaint form: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>.

To view a copy of RMTD's Title VI Discrimination Complaint Form please see Appendix C. To view a full text copy of RMTD's Title VI Discrimination Complaint Procedure, please see Appendix D.

## Title VI Investigations

All FTA recipients are required to prepare and maintain a list of any complaints alleging discrimination on 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 no new construction sites.

## 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 and Outreach

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

## Public Participation Plan

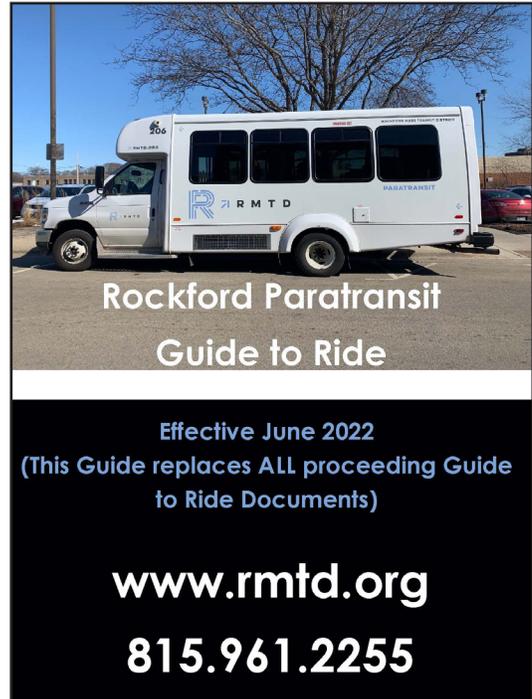
Rockford Mass Transit District Public Participation Plan (PPP) outlines the strategies developed to disseminate information to the public on its transportation planning and programming processes, most specifically route and rate changes, in addition to projects, studies and plans, as well as gathering 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 of its patrons. Please see Appendix G for the full text Public Participation Plan. Please see Appendix H for all public 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 its 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 a 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 its 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 its 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 Limited English Proficiency 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 provides and maintains a “Guide to Ride” information booklet. This eight-page booklet is available free upon request and consists of a description of the service, eligibility requirements, procedures for determining eligibility and making an 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, including 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 number of seats available. Vehicle load shall not exceed 1.5 during peak periods and 1.0 in off-peak period (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' NABI	29	44	29
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 most 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 arrive 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 1/2 mile of a RMTD bus stop.

- 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.

## 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. Specific vehicles are assigned to routes only when required by operating conditions, such as when faster buses are required to more rapidly accelerate to higher speed highway conditions. 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.

In contrast, the seven (7) routes selected for initial deployment of its first Battery Electric Buses (BEB)’s were determined based on the daily mileage of run assignments, operating environment (passenger loads, neighborhood vs. arterial street) and environmental justice consideration. The North Main #4 & East State #11 are not Environmental Justice routes, but these routes specifically provide minorities and low-income individuals with important access to jobs and services and are the second highest ridership routes in the system. The School Street #2, South Main #7, Charles #12, and 7<sup>th</sup> Street #14 routes all meet the Environmental Justice criteria.

## 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, centers for persons with disabilities, etc.;
- Activity locations, including high densities of population, employment, commerce, or services;

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 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 proposed 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

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.

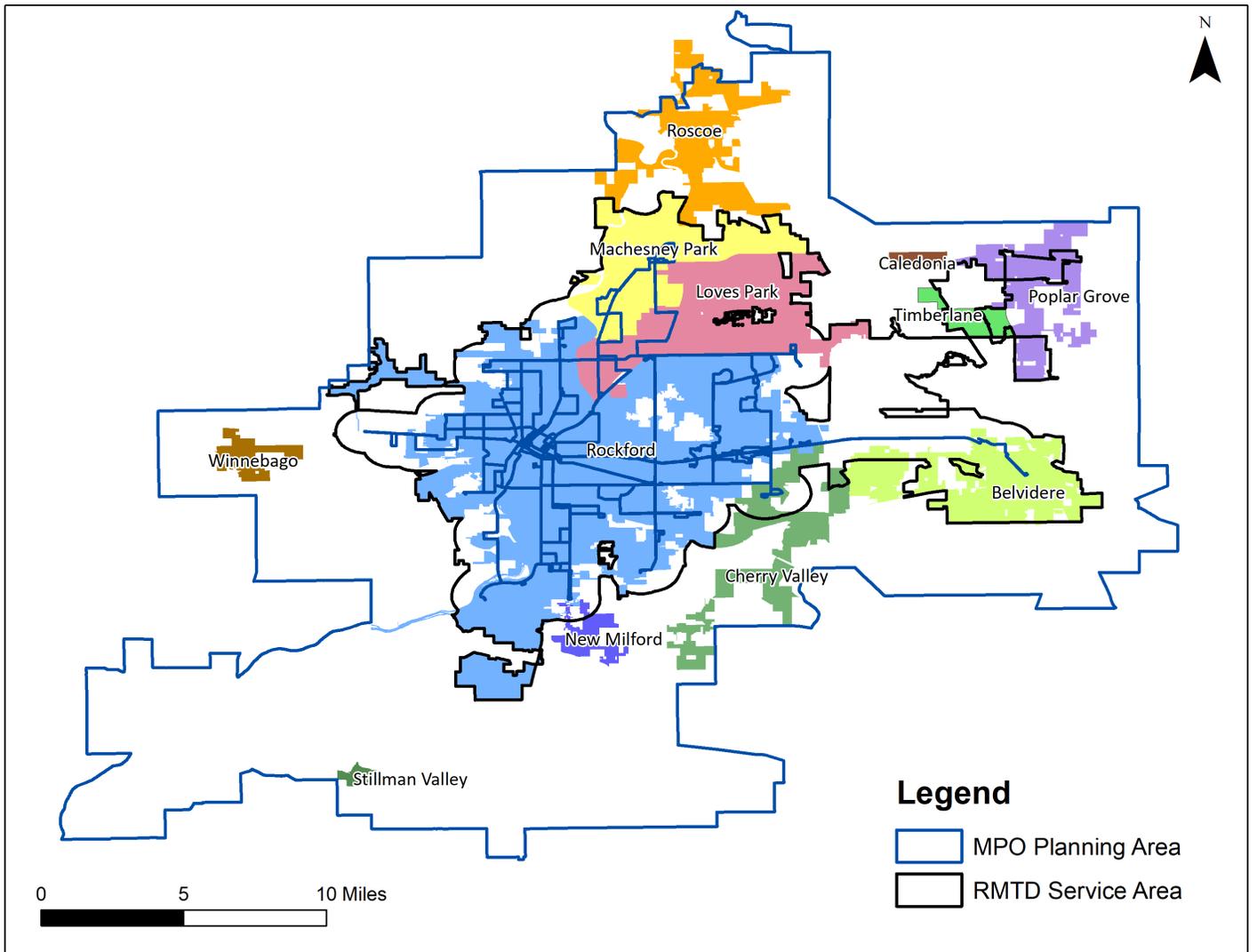
In 2009, a Memorandum of Understanding for Cooperative Transportation Planning was signed between R1's predecessor, the Rockford Metropolitan Agency for Planning, and the public transit agencies within its boundaries, including RMTD. The MOU includes that R1 will:

- 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: Map of RMTD Service Area and R1 Planning Area Boundaries



## Chapter 8

# Service Area Demographics

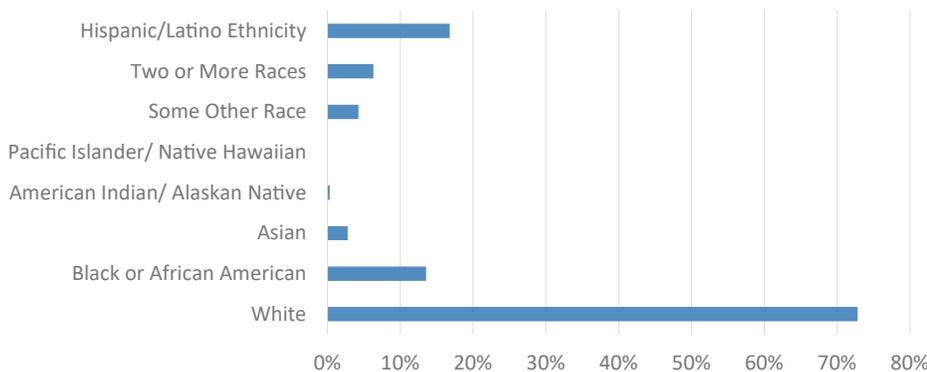
While not required for a fixed route provider of RMTD's size, R1 and RMTD have compiled a collection of data applicable to the Title VI Program and Environmental Justice Assessment to guide future planning. An understanding of RMTD's service area demographics is needed to ensure that transportation planning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

The following demographic and environmental justice 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.

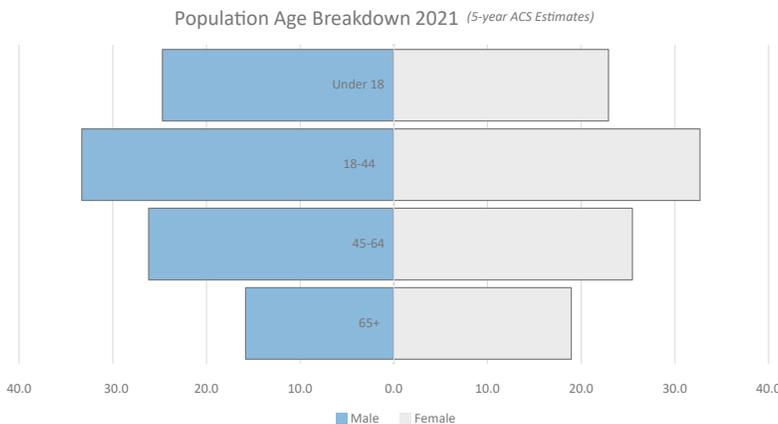
## Demographic Profile

According to 2017-2021 American Community Survey (ACS) 5-year estimates, 281,713 people reside within the RMTD service area, with racial minorities comprising 27.0 percent of the population. The largest racial minority group is Black or African American at 14.0 percent, while Hispanic or Latino ethnicity represents the largest ethnic minority group at 17.0 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 2021 (ACS 5-year estimates)



**Figure 8-2:** Age Group Breakdown



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 24.0 percent of the RMTD service area, while working age adults (18-64) make up 59.0 percent. The remaining 17.0 percent of residents living in the service area are over the age of 65. The male to female ratio remains close with 51.0 percent of service area residents identifying as female and 49.0 percent identifying as male. A breakdown of ages group populations within the service area can be found in Figure 8-2.

Additionally, 17,255 people (6.1 percent) in the RMTD service area fall under the poverty line as reported by the 2017-2021 ACS estimates established by the U.S. Department of Health and Human Services poverty guidelines.

## Chapter 9

# Environmental Justice Assessment

Environmental Justice (EJ) builds upon Title VI activities by including the consideration of impacts to low-income populations, in addition to minority populations, in the transportation planning and decision-making processes. The guiding principles of environmental justice are:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effect, including social and economic effect, on minority 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.

The history of development within the Rockford Region highlights the importance of tracking environmental justice factors. From the second half of the 20th century, the Rockford Region has experienced rapid eastward expansion stemming from the early decision to place Interstate 90 on the far eastern extremity of the region. An increased need for infrastructure to support economic expansion in the east came at the expense of infrastructure in the urban core. While many new capital projects are working to reverse this issue, the effect of business redevelopment detached from working populations continues to strain public transit services, often requiring fixed routes to transverse low-density white and high-income neighborhoods to connect minority and low-income populations to employment centers capitalizing on interstate access.

## Assessing Impacts of Environmental Justice

Establishing a demographic baseline is a vital step in conducting an Environmental Justice assessment. R1 has calculated thresholds for the RMTD service area that can be useful for determining areas with Traditionally Underserved Populations (TUP) that may be particularly impacted by a service change or facility improvement. A threshold represents the overall concentration of a population across the entire service area. To calculate each threshold, a regional average for each targeted population was used. The threshold was then applied to all the census block groups within the service area to identify areas with higher than average minority densities. To comply with Environmental Justice criteria, thresholds were calculated for traditionally underserved populations including low-income, elderly, zero car households, racial and ethnic minorities, and those with limited English proficiency, and are detailed in the following section.

These thresholds are meant to provide a broad overview of demographic conditions across the service area. More detailed breakdowns may be required in the event of a service change or fare increase. Service area thresholds depict population percentages by census block group. Maps illustrating the geographic dispersion of thresholds are located in Appendix L.

**Table 9-1:** Environmental Justice Thresholds

Justice Regional Thresholds	
Seniors (65+ year old)	17.59%
Below Poverty Level	17.19%
Minority	28.49%
Hispanic	16.95%
No Vehicle Household	9.39%
Limited English Proficiency (LEP)	2.97%

## Environmental Justice Thresholds

The following Environmental Justice thresholds are based on 2017-2021 ACS 5-year estimates. Some census block groups within the service area extend beyond the service area boundary, therefore population estimates will exceed the actual service area population.

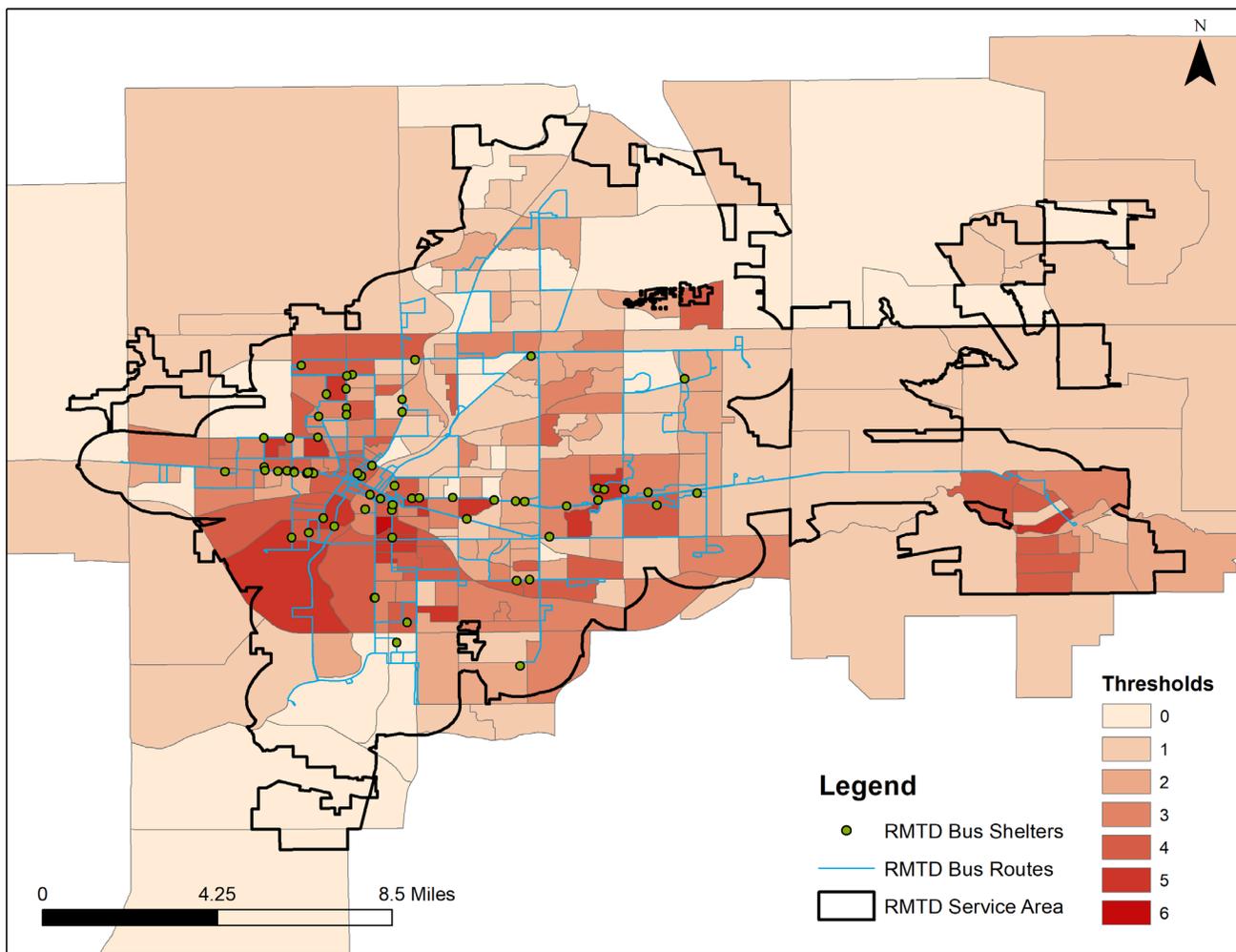
**Total Racial Minority:** A person of Black or African-American, Asian, American Indian or Alaska Native, Hawaiian and Pacific Islander descent, some other race alone, or those identifying themselves as having two or more races. The threshold for the service area is 28.49 percent; 34.0 percent of the census block groups within the service area reached the threshold.

**Hispanic or Latino Minority:** A person of Mexican, Puerto Rican, Cuban, Central or South American descent, regardless of race. The threshold for the service area is 16.95 percent; 37.0 percent of census block groups within the service area reached the threshold.

**Limited English Proficiency:** A measure of population 5 years and over who speaks English “not well” or “not at all”. The threshold for the service area is 2.97 percent; 28.0 percent of census block groups within the service area reached the threshold.

**Zero Car Households:** A measure of owner and renter households that are without a vehicle. The threshold for this service area is 9.39 percent; 36.0 percent of census block groups within the service area reached the threshold.

**Figure 9-1:** Map of Environmental Justice Thresholds by Block Group (2017 – 2021 ACS)



**Low Income:** A measure of family households and non-family householder’s income in the past 12-months compared to the poverty threshold appropriate for that family size or for a single-person. The threshold for this service area 17.19 percent; 43.0 percent of census block groups within the service area reached the threshold.

**Seniors:** A person who is 65 years or older in age. Seniors over the age of 65 qualify for free rides on the RMTD system. The threshold for the service area is 17.59 percent; 46.0 percent of census block groups within the service area reached the threshold.

Using the thresholds established, census block groups were then categorized by how many EJ thresholds they exceeded. This allows the census block groups to be mapped showing the concentration of the identified populations. Darker areas on the map indicate a greater concentration of Traditionally Underserved Populations (TUPs).

Figure 9-1. illustrates the percentage of census block groups that reached between 0 and 6 thresholds. Any block group with an identified population representing greater than the established threshold is considered an environmental justice area of concern.

## Employment Locations

To adequately service transit-dependent populations, RMTD must provide the vital linkages between places of residence, employment, and access to goods and services. Using the Census Bureau’s “On the Map” tool, maps (Appendix L) were generated to illustrate the relative density of employment by race, ethnicity, and income level in the service area. These maps provide a reference of key employment corridors that can inform future planning decisions.

Specifically, these maps illustrate that the concentration of jobs is largely in downtown and east along State Street with a concentration in Belvidere, IL as well. While the downtown job concentration potentially benefits the underserved population concentrated there, the high employment density to the east and in Belvidere are remote from the locations that most traditionally underserved populations reside. The distinct scarcity of jobs in Rockford’s west side necessitates that public transit extends into the other parts of the region to provide traditionally underserved populations with access to jobs, commerce, and services. A visual inspection of the route system overlaid on top of the employment density maps demonstrates the route system provides vital connections to and between these employment corridors.

According to the 2021 ACS 5-Year data, less than 1.0 percent of the workers in the Rockford MSA use public transit to get to work. Most workers drive alone (81.0 percent), followed by carpooling (10.0 percent). Of those workers that carpool, white people and Hispanic or Latino people make up the largest proportion of carpoolers (Table 9-2). Of those who use public transit, white people, black or African American people, and low income people make up the largest proportion of those who use public transit (Table 9-2).

**Table 9-2:** Means of Transportation to Work

Group	Drive	Carpool	Transit
White	80.4%	72.9%	48.8%
Asian	2.7%	3.1%	0.0%
Black or African American	9.2%	10.8%	40.6%
Hispanic or Latino	13.9%	22.7%	10.1%
2 or more races	3.5%	6.3%	3.6%
Low-Income	7.4%	14.4%	38.3%

## Analysis of Individual Routes

In past environmental justice assessments, it has been found that RMTD is committed to providing the most cost-effective service possible to as many people as possible. RMTD substantially provides more opportunities to access transit for minority populations. This current evaluation finds the same.

A demographic breakdown for each route in the RMTD system is available in Table L-1 in Appendix L. The profile for each route is made up of all census block groups that are directly intersected by a RMTD route. Using the thresholds of 28.49 percent for racial minorities and 16.95 percent for Hispanic or Latino ethnicity, as established in the demographic profile earlier, only 7 of 25 total routes cumulatively fall below the average percentage of minorities served per the service area; fully 88.0 percent of RMTD routes meet the general definition of a minority transit route. Each route passes through a census block group that exceeds the racial minority threshold.

Routes not meeting the general threshold criteria include routes #13, #18, #20, #22, #36 and #40. As previously discussed throughout the EJ section, these routes specifically provide minorities with important access to jobs and services. The purpose for and major destinations of each of these routes include:

**13 Rural:** This route circulates in the heart of Rockford’s downtown district. This route provides service to Park Terrace (a major senior low-income development), the University of Illinois College of Medicine Rockford, a full service nursing home and rehabilitation center, and the YMCA.

**18 Bell School:** This route provides access to medical, employment, and retail centers. This route services the newly built Swedish American Cancer Center, Women’s Health Center, key employment centers, as well as providing service to multiple supermarkets.

**20 Alpine Crosstown:** This route provides access along Alpine Road, a major arterial that spans the entirety of the service area from North to South. Outside of specific destinations along the route, including Rock Valley College’s Stenstrom Center, the Eastrock Industrial Park, Highcrest and Edgebrook shopping centers, and numerous other industrial jobs, this route also provides transfer connections to other routes at Colonial Village Mall, the Alpine/State Street commercial area, the Riverside/Forest Hills/Alpine commercials areas, and the fast-growing commercial areas at the north end of this route along IL-173.

**22 North 2nd St:** This route serves a dual purpose role as a circulator for two regional suburbs, Loves Park and Machesney Park, as well as a connection into the Rockford Area. Major destinations include the Machesney Park Mall, Woodward Inc., and Bridgeway Inc.

**24 Belvidere:** This route provides service into Belvidere and other human service facilities such as the Boone County Council of Aging.

**36 Perryville/Alpine:** This route provides service on weeknights only in place of the City Loops and Alpine Crosstown routes, and includes access to Rock Valley College, retail centers on Perryville road, two Walmart’s, Cherryvale Mall, and the East Side Transfer Center.

**40 East State:** This route provides service on weeknights and Sundays. This route connects the Downtown Transfer Center with the East Side Transfer Center, and provides service to the robust retail and service centers along Business US 20 in addition to Swedish American Hospital, OSF St. Anthony Hospital, and Rockford University.

RMTD’s route system provides greater access to minorities, low-income individuals, and the remaining transit-dependent populations than the remaining service area population.

## Location of the Main Transit Center

This assessment concurs with past assessments of the location of the Downtown Transfer Center. The Downtown Transfer Center is the heart of RMTD’s operation, and is strategically placed to the advantage of minority populations. It is located in downtown Rockford on the block bounded by West State, Court, Mulberry



and Winnebago Streets. The Downtown Transfer Center is the one place where a patron can easily access nearly every bus route in the system.

The center is continually manned and offers patrons the most convenient place in the system for obtaining information, tickets, and other services, while providing a completely sheltered, comfortable, heated, air-conditioned, and monitored waiting area for bus patrons. Renovation of the Downtown Transfer Center was completed in 2019.

RMTD received REBUILD Illinois grant funding to expand its administration, operations, and maintenance facility, which is at the same location of the downtown transfer center. The proposed addition would provide sufficient space to accommodate current and future fixed route vehicle storage needs while integrating battery electric charging infrastructure into the facility. The initial planning phase is completed and the site construction phase will be the next step in the process. Currently, no construction has occurred.

## Bus Shelters

Bus stop shelters are a valuable enhancement to the RMTD transit service. Bus shelters provide patrons a welcome respite from the elements, providing a safe and comfortable place to await the next bus. In addition, they provide a less frequent transit patron the assurance that they are on a bus route and at a location where the bus will stop. RMTD began providing bus shelters in the 1970s and has been steadily adding to its numbers as funding permits.

RMTD consults with the MPO Livable Communities forum to receive feedback on potential locations for additional shelters. RMTD currently has 68 installed shelters, 59 of which are located in areas with higher than average minority populations. The remainder service high ridership routes, particularly along East State Street and northern Rockford. Overall, the placement of RMTD's shelters is considered to be of significantly greater benefit to minorities and low incomes persons than to non-minorities and upper income individuals. Table L-2 in Appendix L lists the locations of bus shelters.

## Overall Findings

Transit providers such as RMTD offer an essential service for many disadvantaged populations who otherwise may not have access to employment, medical appointments, shopping and recreation. In past assessments, the RMTD route and schedule structure was found to strongly provide better service to minorities and low-income individuals, as has this review. Coupled with the fact that RMTD has never received a discrimination complaint, it is found that RMTD provides superior service to the region's transit-dependent populations.

The RMTD route system serves a proportionately higher population of minority and disadvantaged groups. As evident through previously cited maps and analysis, minority and transit-dependent areas are well served by transit routes and bus stop amenities. The main Downtown Transit Center serves as a vital transportation hub in the heart of predominantly minority comprised neighborhoods and as such greatly favors service to these minorities and disadvantaged groups.

To continue providing the same level of exceptional service, RMTD is encouraged to continue to work closely with R1 to monitor changes in service area demographics toward the goal of providing equitable transit service to those persons who need it most. Additionally, RMTD is encouraged to continue to ensure that new investments and transit facilities, service, maintenance and vehicle replacement deliver equitable levels of service and benefits to these traditionally underserved and disadvantaged populations. This can be achieved through continuing to actively engage minority populations in the transportation decision making process to avoid, minimize, or mitigate any disproportionately high and adverse effects.

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## Appendix A

# RMTD Board of Trustees Title VI Approval Resolution



ROCKFORD MASS TRANSIT DISTRICT

p 815-961-9000  
f 815-961-9892

520 Mulberry St.  
Rockford, IL 61101

[rmtd.org](http://rmtd.org) →

### Resolution No. R-23-10

Resolution authorizing adoption of the 2024-2026 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 2024-2026 Rockford Mass Transit District Title VI Program and Environmental Justice Assessment presented within is hereby adopted.

PRESENT and ADOPTED the 24th day of July 2023

A handwritten signature in blue ink, appearing to read 'S. Ernst', is written above a horizontal line.

Stephen Ernst, Vice 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 'D. Sidney', is written above a horizontal line.

David Sidney, Secretary/Treasurer

## Appendix B

# Title VI Notice to the Public

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.

For more information on Rockford Mass Transit's Title VI policy of the procedures to file a complaint, contact RMTD at 815-961-9000.

## Rockford Transporte Público Distrito Título VI Aviso al Público

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.

Para obtener más información sobre la RMTD Título VI de políticas o los procedimientos para presentar una queja, comuníquese RMTD al 815-961-9000.

## Appendix C

# Title VI Complaint Form

### 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.

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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
<b>Section III:</b>				

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.

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## 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) Officer.

Written complaints shall be sent to:  
Rockford Mass Transit District  
520 Mulberry Street  
Rockford, IL 61101

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 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 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 complainant
  - 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 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 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 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: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>

FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

## 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 Diipla (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 Diipla, 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 Planning 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 15 hybrid electric buses and six battery electric buses to its fleet between 2020 and 2023. The state-of-the-art buses, purchased from Gillig Corporation, an American company based in Hayward, California, will replace RMTD's aging fleet. There are eight additional hybrid buses on order.

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.

Clever- realtime bus tracking.

### 3. Token Transit App.

RMTD riders have a new way to purchase fares. Anyone with a smartphone can download the new Token Transit app from either Google Play Store or the App Store. Once downloaded, a few simple steps are all it takes to purchase fares from your phone.

### 4. Service Hours Extended.

In 2021, RMTD service hours have been extended by 1 hour before (4:15AM) and 1 hour after (12AM) for its weekday fixed routes.

### 5. New fare options: RMTD has added several new fare options described below.

#### University Pass (U-Pass)

With RMTD's new U-Pass, college students can ride for less- half off the normal adult monthly pass at just \$27 a month! That's less than the cost of half a tank of gas.

Riding the bus is not only cheaper than traveling by car, but public transportation prevents 37 million metric tons of carbon dioxide from polluting its air annually in the United States. And, it reduces noise pollution and respiratory diseases. Maybe that's why 34 million times every week, smart Americans get on board public transportation. It is exactly why we continue to build its fleet of hybrid and battery-electric periwinkle blue buses.

Get smart and save with RMTD's U-Pass, Rockford area college students.

#### Free Rides for Veterans and Students (K-12)

The City of Rockford and the Rockford Mass Transit District announced on Monday, December 20, 2021 that starting

January 3, 2022, veterans and students K-12 will be able to ride on the RMTD Fixed Route System for free.

Students in grades K-12 need only to show their school ID cards to the drivers as they board the buses. If they attend a school that does not issue an ID card and are in grades K-12, they can purchase an RMTD Student Free Ride ID card for \$2.00 at either of its Transfer Center locations and show this to the driver as they board. They must present proof of identity and proof of enrollment in a K-12 program to get a RMTD photo ID.

Our veterans will also need to obtain a Free Ride Veterans ID to identify them as a veteran. Once they have that ID card, they also need to only show this to the operator to get a free ride. To obtain an RMTD ID card veterans can go to either RMTD transfer center and present proof of identity and proof of military service. Due to generous donations from the community members at large, the cost of the \$5.00 ID fee has been paid for the first 50 veterans who come to get an ID card.

## 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

Date	Time	Description	Location
12/6/2022	6:00 PM	U-Pass Program (for College Students)	Rock Valley College, 3301 North Mulford Road, Rockford, IL 61114
7/26/2022	2:45 PM	Rebuild Illinois Capital Assistance Application #3	Administrative Office, 520 Mulberry Street, Rockford IL 61101
4/29/2022	2:00 PM	2022 Consolidated Vehicle Procurement (CVP) Capital Assistance Application	Administrative Office, 520 Mulberry Street, Rockford IL 61101
3/30/2022	3:30 PM	FY 2023 Budget	Administrative Office, 520 Mulberry Street, Rockford IL 61101
8/23/2021	2:45 PM	Rehabilitation/renovation and expansion of the 520 Mulberry Street Transit Facility (Maintenance, Operations and Administration Building)	Administrative Office, 520 Mulberry Street, Rockford IL 61101
3/29/2021	3:30 PM	FY 2022 Budget	Administrative Office, 520 Mulberry Street, Rockford IL 61101

## Appendix I

# Rockford Mass Transit District Limited English Proficiency Plan 2023



## 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 2017-2021 5-year estimates, approximately 49,682 (15.6 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 34,079 residents (10.7 percent), and of this population, 10,806 (31.8 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](http://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 RMTD service area have the highest proportion of individuals who speak English less than “very well” (35 percent), followed by Spanish speakers at 32 percent and Other Indo-European speakers at 31 percent<sup>1</sup>. 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 its very strong ties with RAMP, Catholic Charities, Rockford Public Schools, and Rockford Park District, along with its 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

<sup>1</sup> 2021: ACS 5-Year Estimates: table S1601 Language Spoken at Home for the Rockford MSA.

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](http://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 a 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  
520 Mulberry Street,  
Rockford, IL 61101  
Phone: 815.961.2226  
Email: [mail@rmtd.org](mailto:mail@rmtd.org)

## Exhibit 1 – Language Data Source

Subject	Illinois		Rockford MSA	
	Estimate	Percent	Estimate	Percent
Population 5 years and over	12,376,132	-	318,324	-
English Only	9,269,230	76.8%	268,642	84.4%
Language other than English	2,806,902	23.2%	49,682	15.6%
Speak English less than very well	1,026,708	-	15,691	-
Spanish	1,627,789	13.5%	34,079	10.7%
Speak English less than very well	615,567	37.8%	10,806	31.7%
Other Indo-European languages	677,697	5.6%	6,318	2.0%
Speak English less than very well	223,454	33.0%	1,950	30.9%
Asian and Pacific Island languages	363,091	3.0%	4,816	1.5%
Speak English less than very well	145,199	40.0%	1,683	34.9%
Other languages	138,325	1.1%	4,469	1.4%
Speak English less than very well	42,488	30.7%	1,252	28.0%

## Exhibit 2 – Limited English Proficiency Policy Effective 2013

The Rockford Mass Transit District 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;

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

Should a discrimination allegation be filed, the mechanism to review and resolve the complaint would consist of the following:

- The allegation would first go to the single RMTD staff person assigned to responsibility of reviewing all service complaints.
- If the complaint cannot be satisfactorily resolved at that level, it would be referred to the RMTD Director of Operations and/or RMTD Executive Director.
- It should be noted, however, that RMTD does reserve the right to determine if a complaint should be referred to another governing body such as the MPO, RMAP, or a community advisory group such as RAMP.
- Final appeals would be taken to the RMTD Board of Trustees.

# 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 Agency for the 2023 fiscal year.

### FEDERAL FISCAL YEAR 2023 CERTIFICATIONS AND ASSURANCES

#### FEDERAL FISCAL YEAR 2023 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

##### AFFIRMATION OF APPLICANT

Name of Applicant: Rockford Mass Transit District

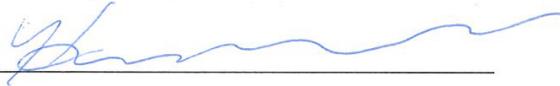
BY SIGNING BELOW, on behalf of Rockford Mass Transit District, I declare that Rockford Mass Transit District has duly authorized me to make these Certifications and Assurances and bind Rockford Mass Transit District's compliance. Thus, Rockford Mass Transit District agrees to comply with all federal 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 federal fiscal year 2023, irrespective of whether the individual that acted on 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 later seek federal assistance to be awarded by FTA during 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 \_\_\_\_\_



Date: February 27, 2023

Name Herbert L. Johnson, Chairman of the Board  
Authorized Representative of Rockford Mass Transit District

##### AFFIRMATION OF APPLICANT'S ATTORNEY

For: ROCKFORD MASS TRANSIT DISTRICT

As the undersigned Attorney for Rockford Mass Transit District, I hereby affirm to Rockford Mass Transit District that it 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 \_\_\_\_\_



Date: February 27, 2023

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

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 2023 Affirmation of Applicant's Attorney above.

  
\_\_\_\_\_  
Tim Rollins, Attorney

CERT AND ASSURANCE FFY 2023.DOC

**FEDERAL FISCAL YEAR 2023 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS**

**Name of Applicant:** Rockford Mass Transit District

**The Applicant certifies to the applicable provisions of categories 01 - 21.**     X    

*Or,*

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

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

# Appendix K

# Title VI Population Density Maps

Figure K-1: Map of Total Population

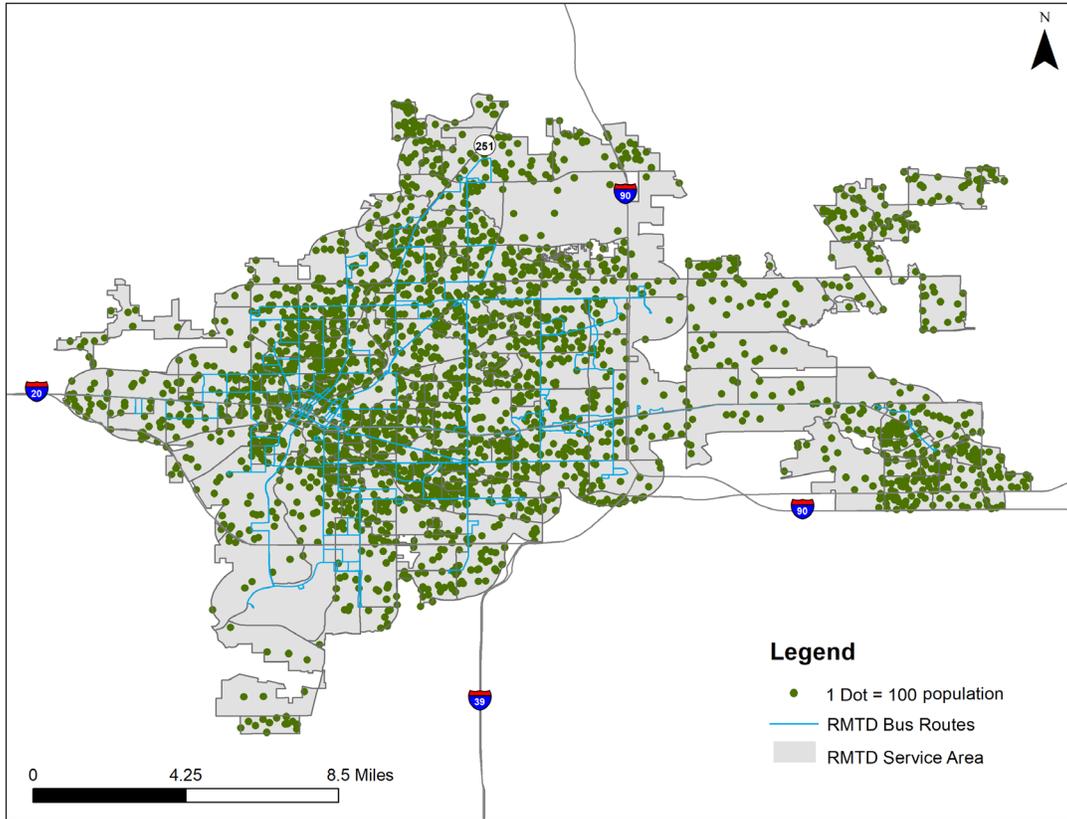


Figure K-2: Map of Total Minority Population

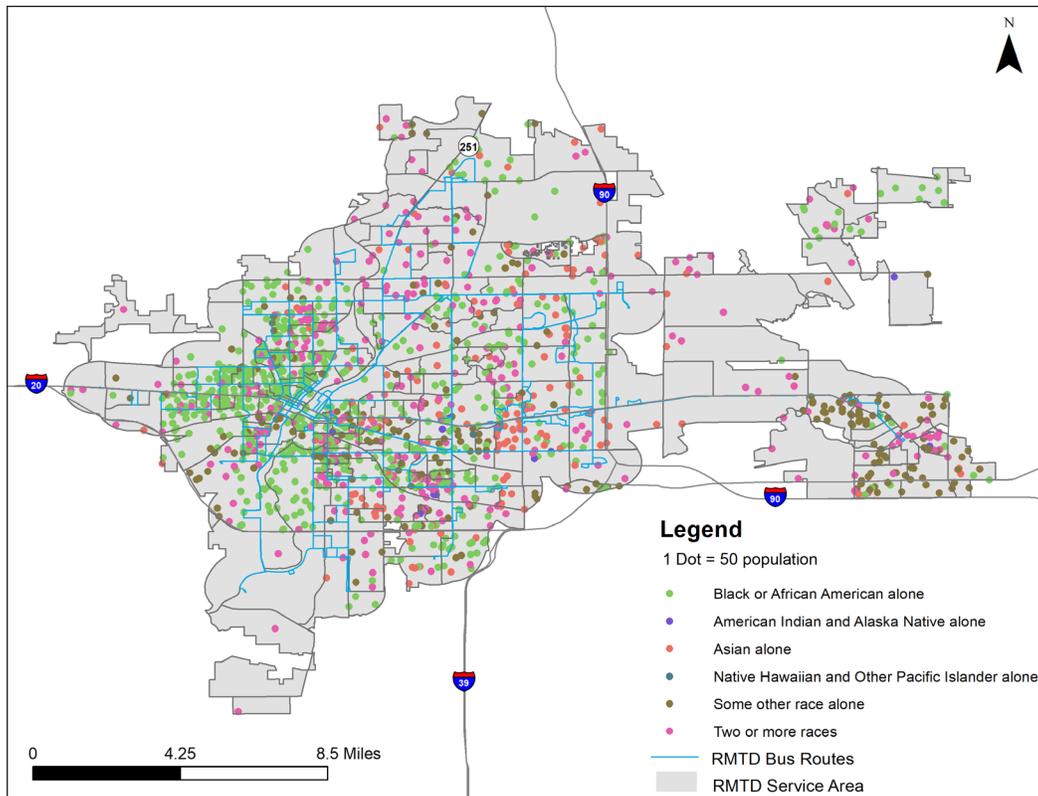


Figure K-3: Map of Black or African American Population

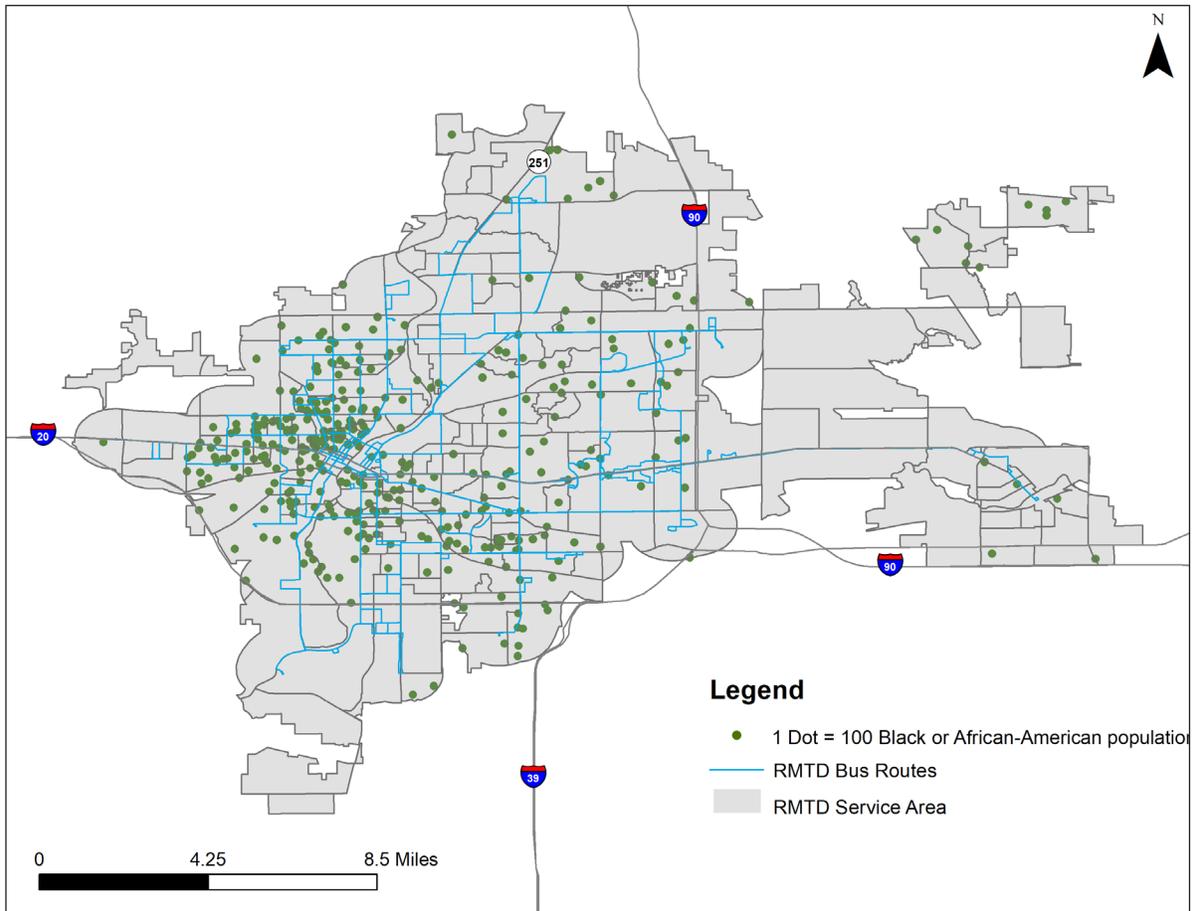


Figure K-4: Map of Hispanic or Latino Population

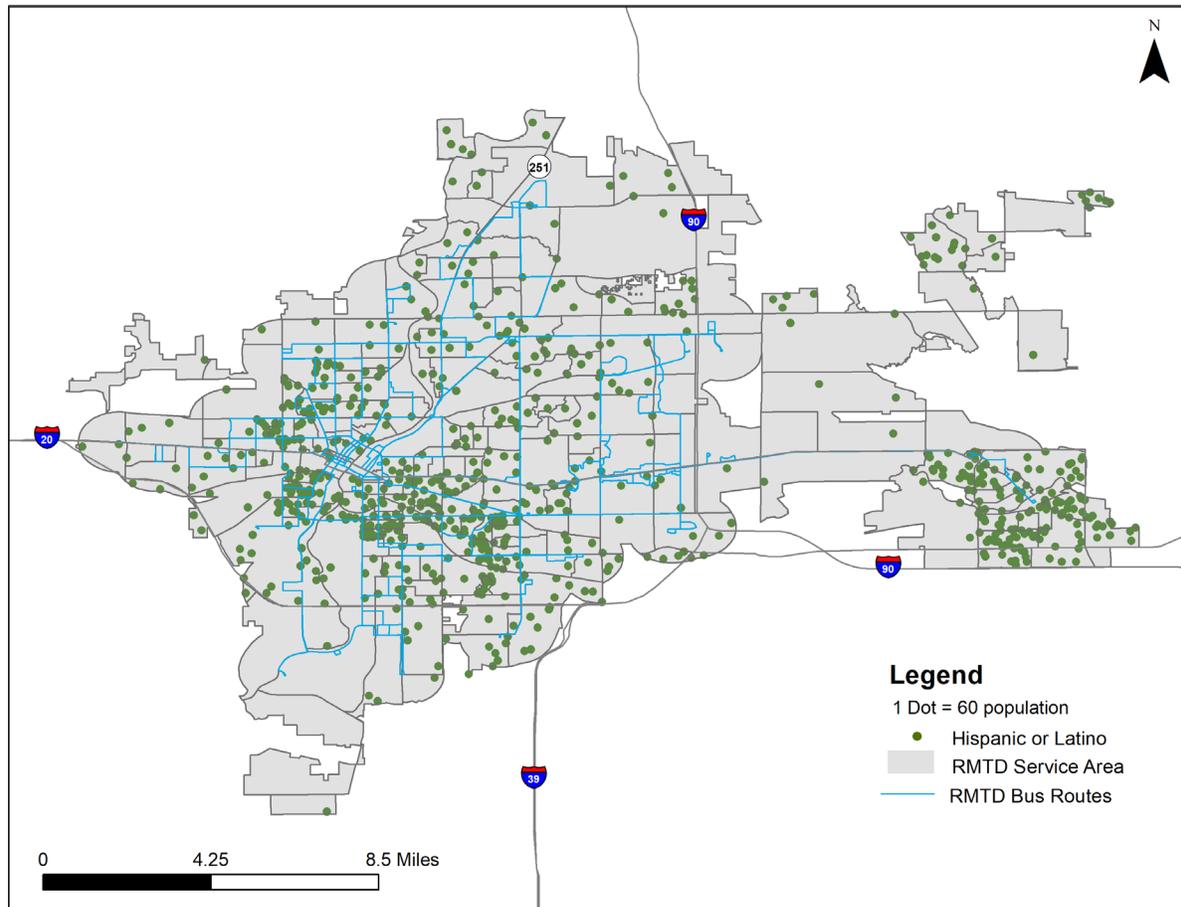


Figure K-5: Map of Asian Population

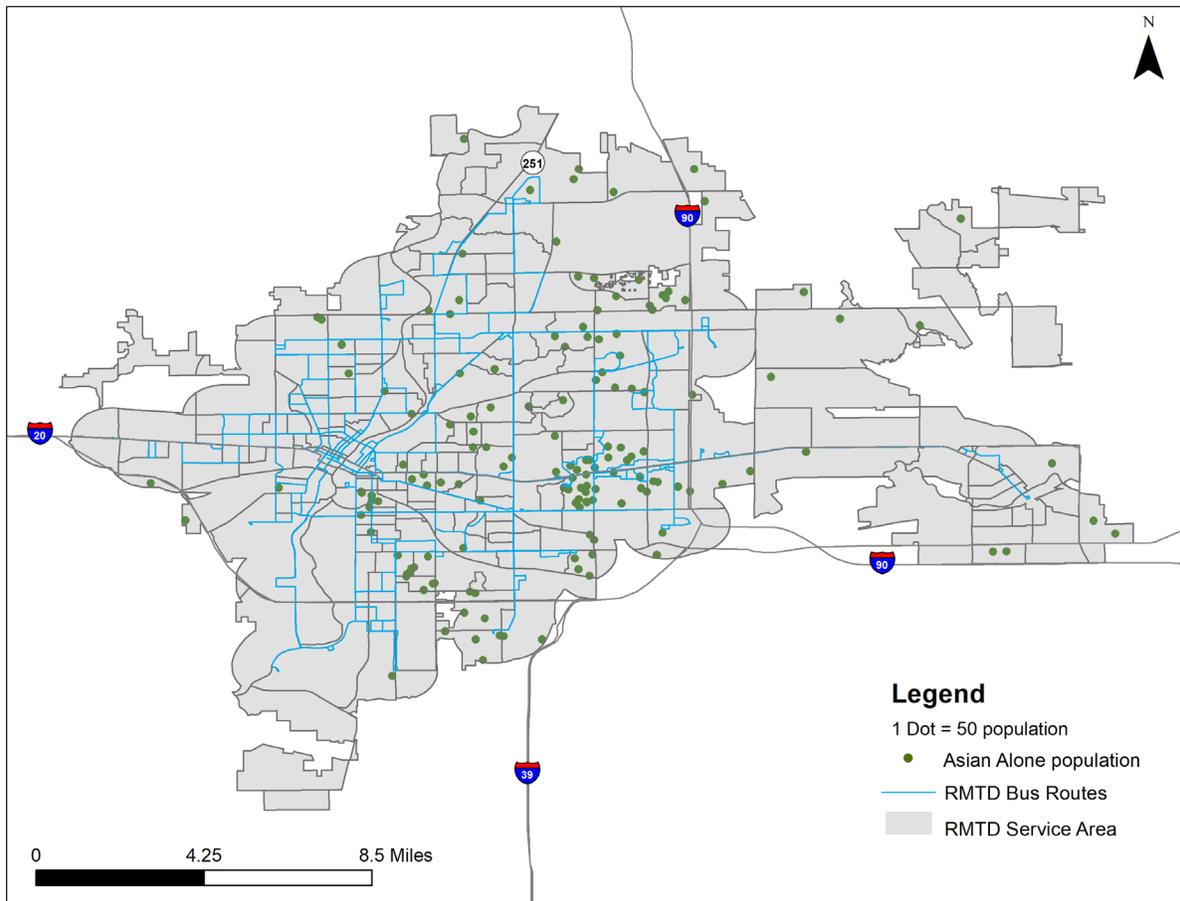


Figure K-6: Map of American Indian and Alaska Native Population

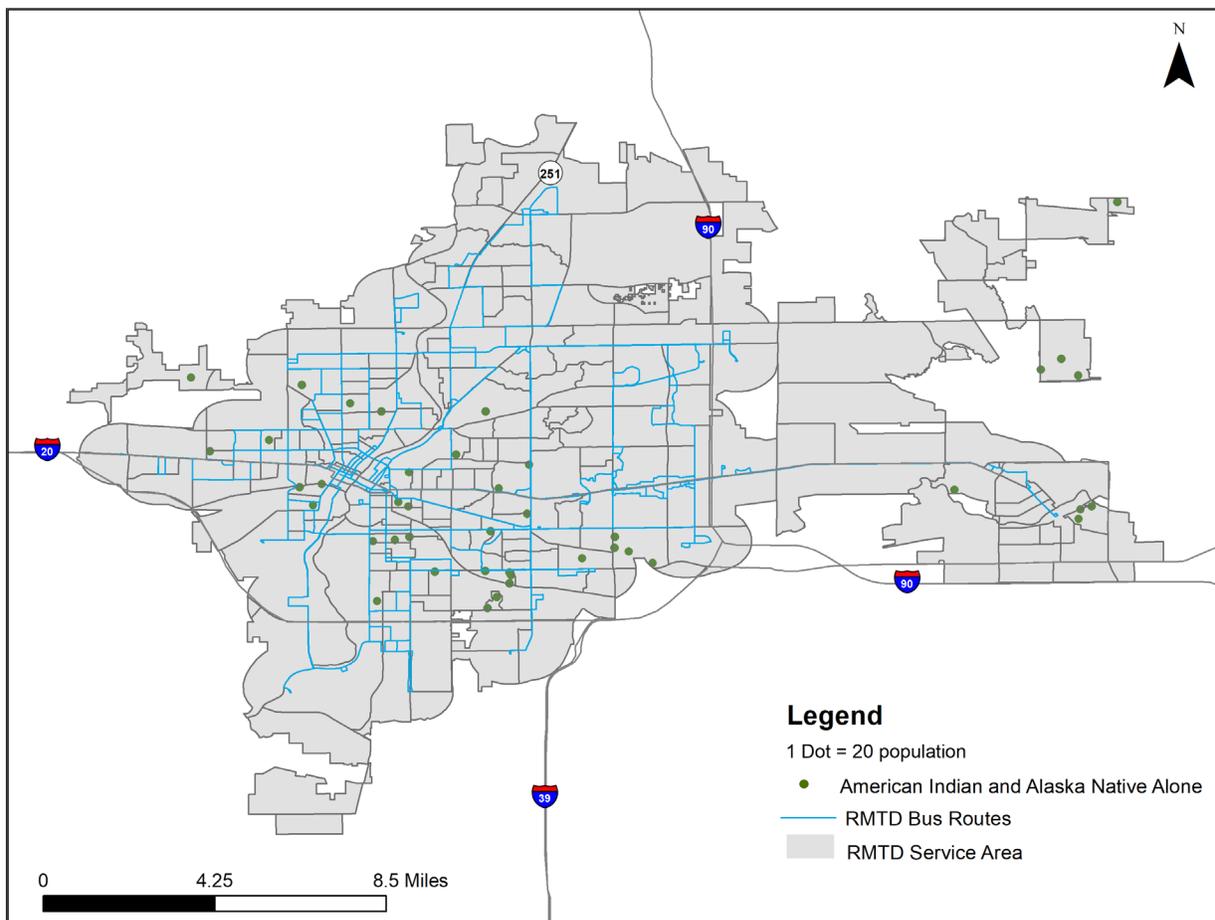


Figure K-7: Map of Native Hawaiian and Other Pacific Islander Population

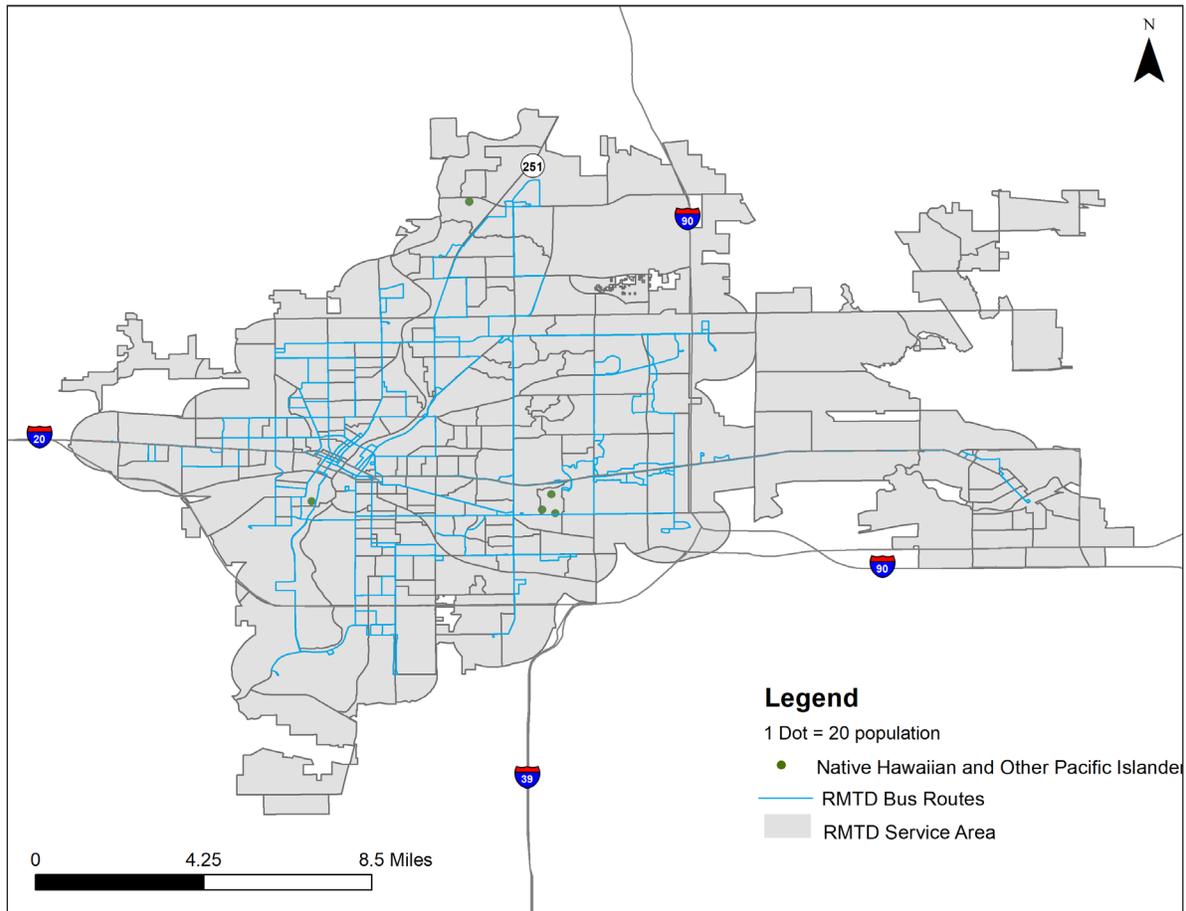


Figure K-8: Map of Some Other Race Population

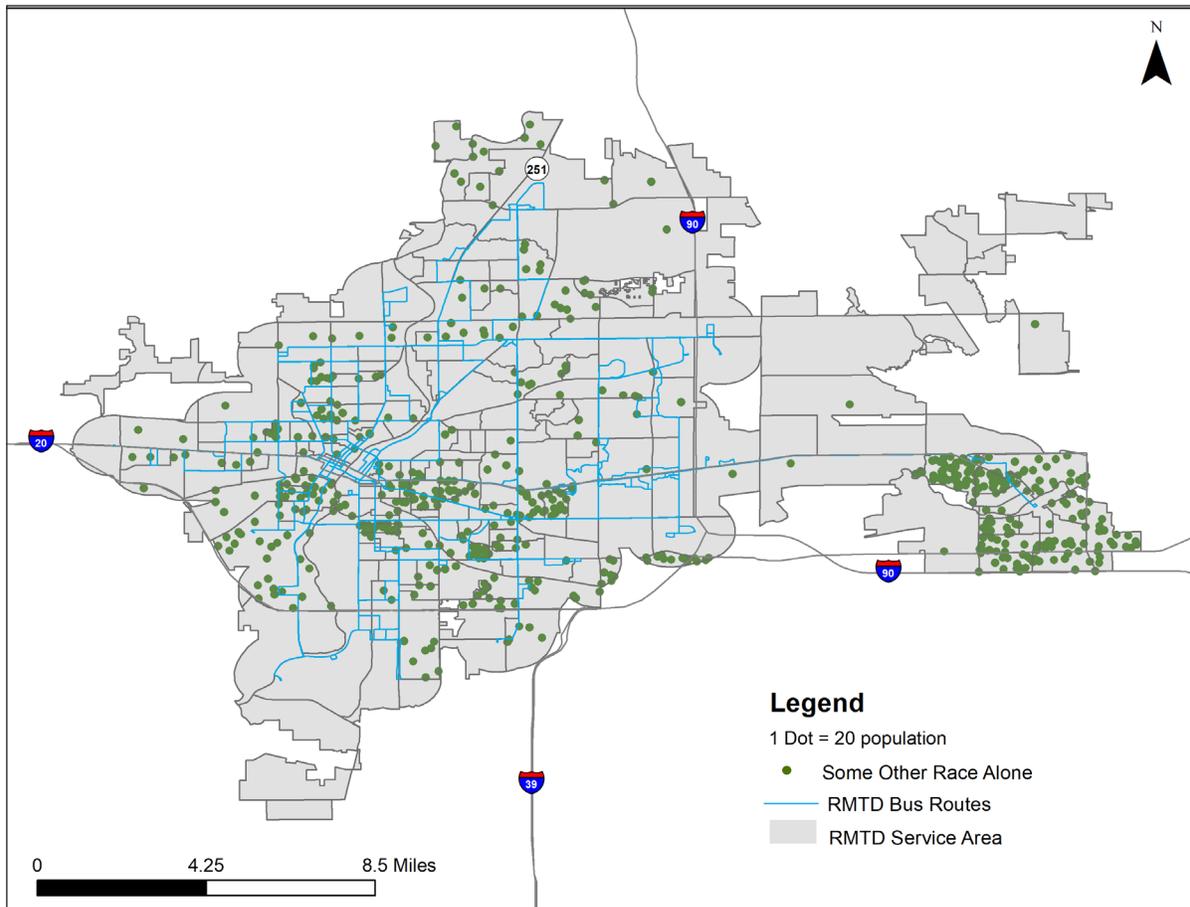
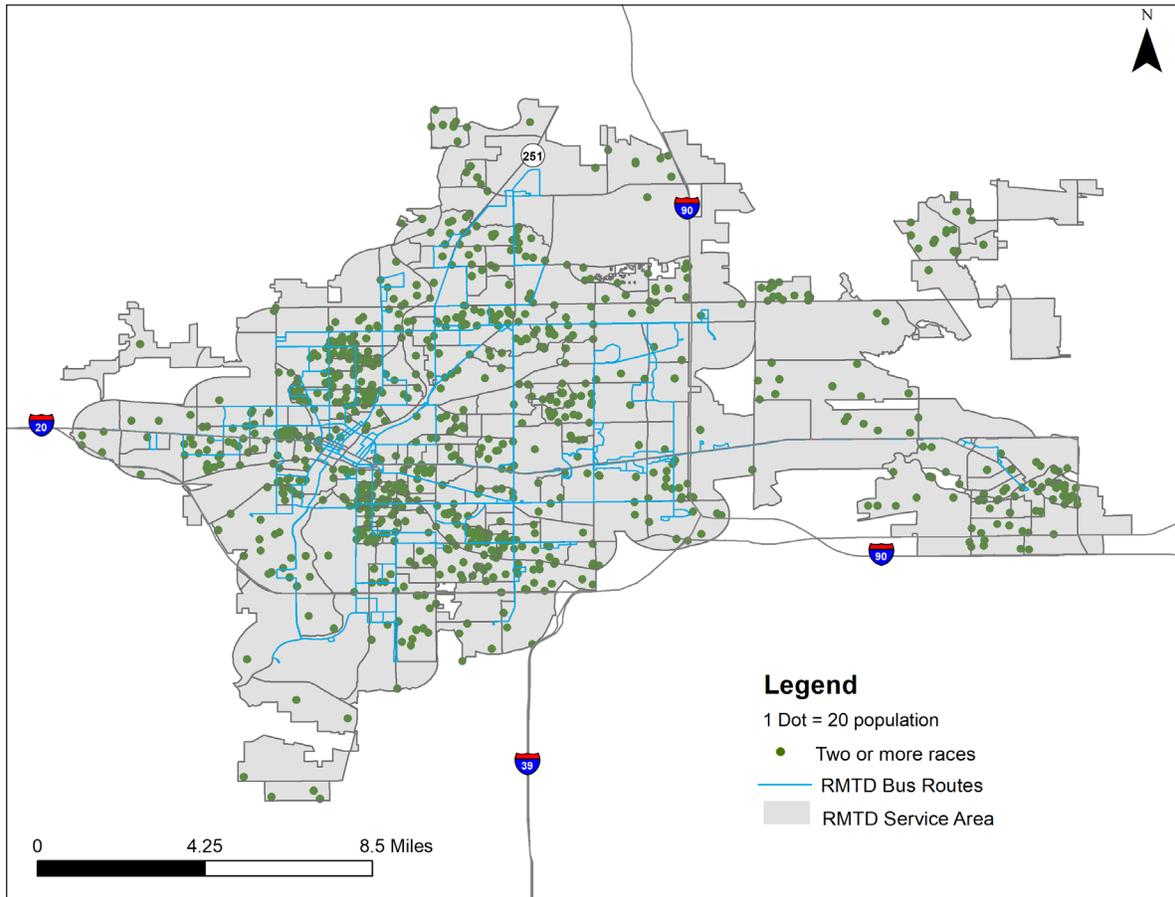


Figure K-9: Map of Two or More Race Population



# Appendix L

# Environmental Justice Maps and Tables

Figure L-1: Map of RMTD Service and R1 Planning Area Boundaries

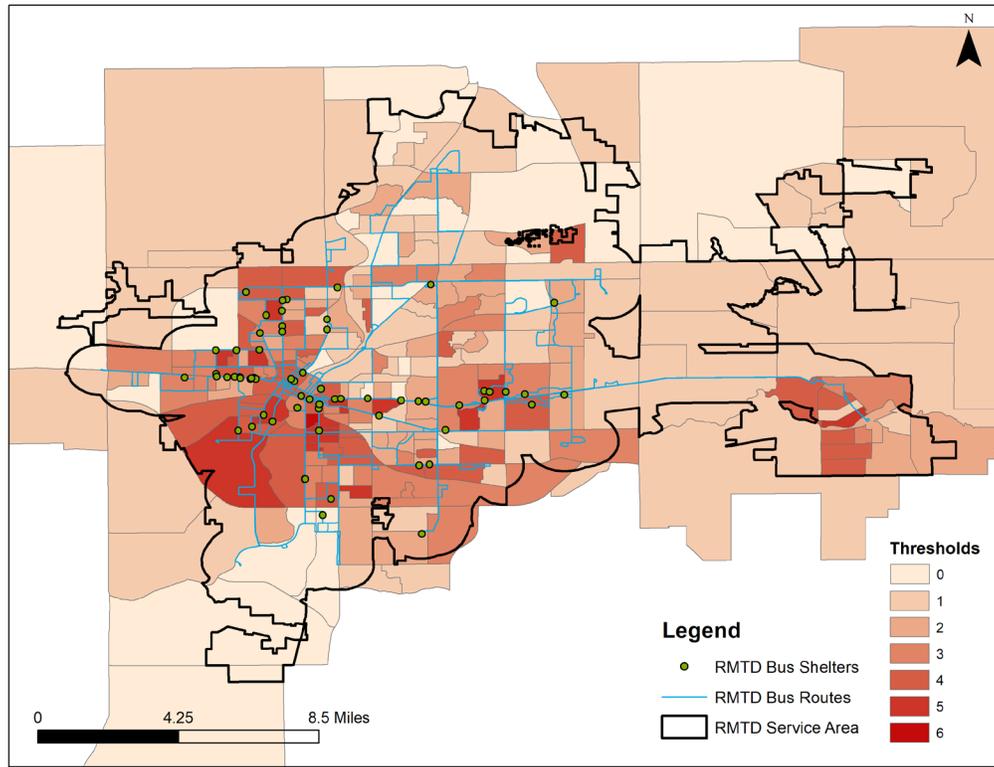
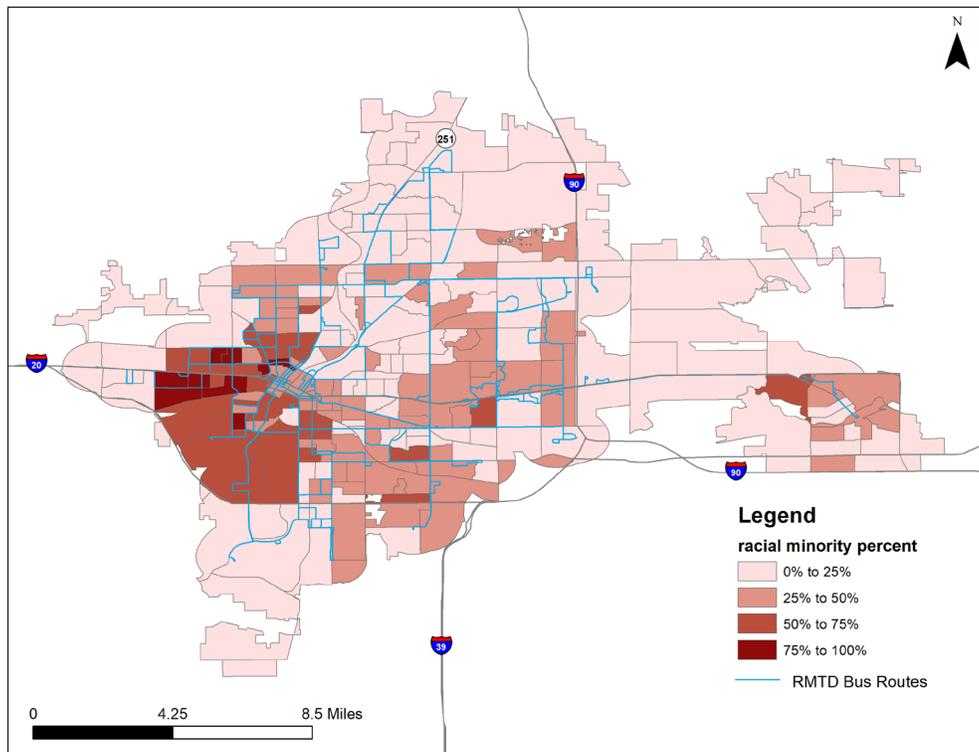
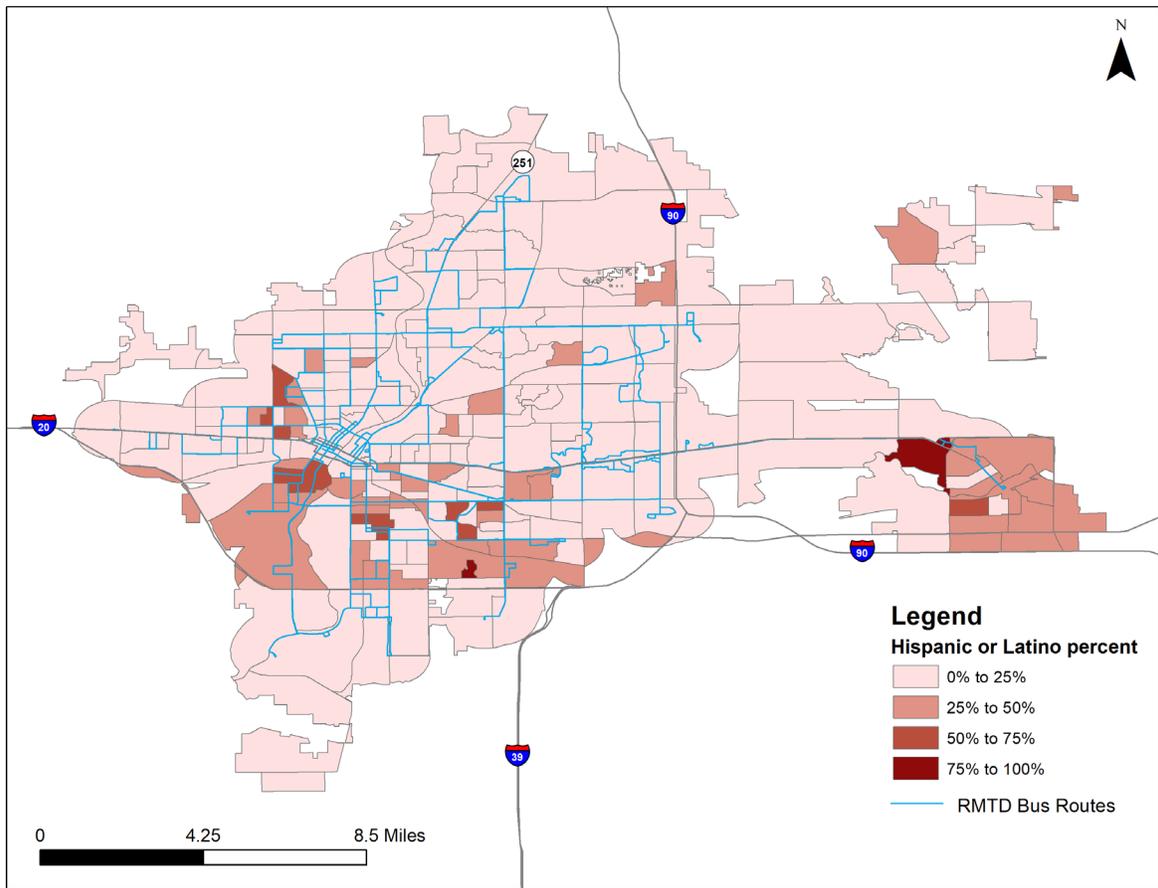


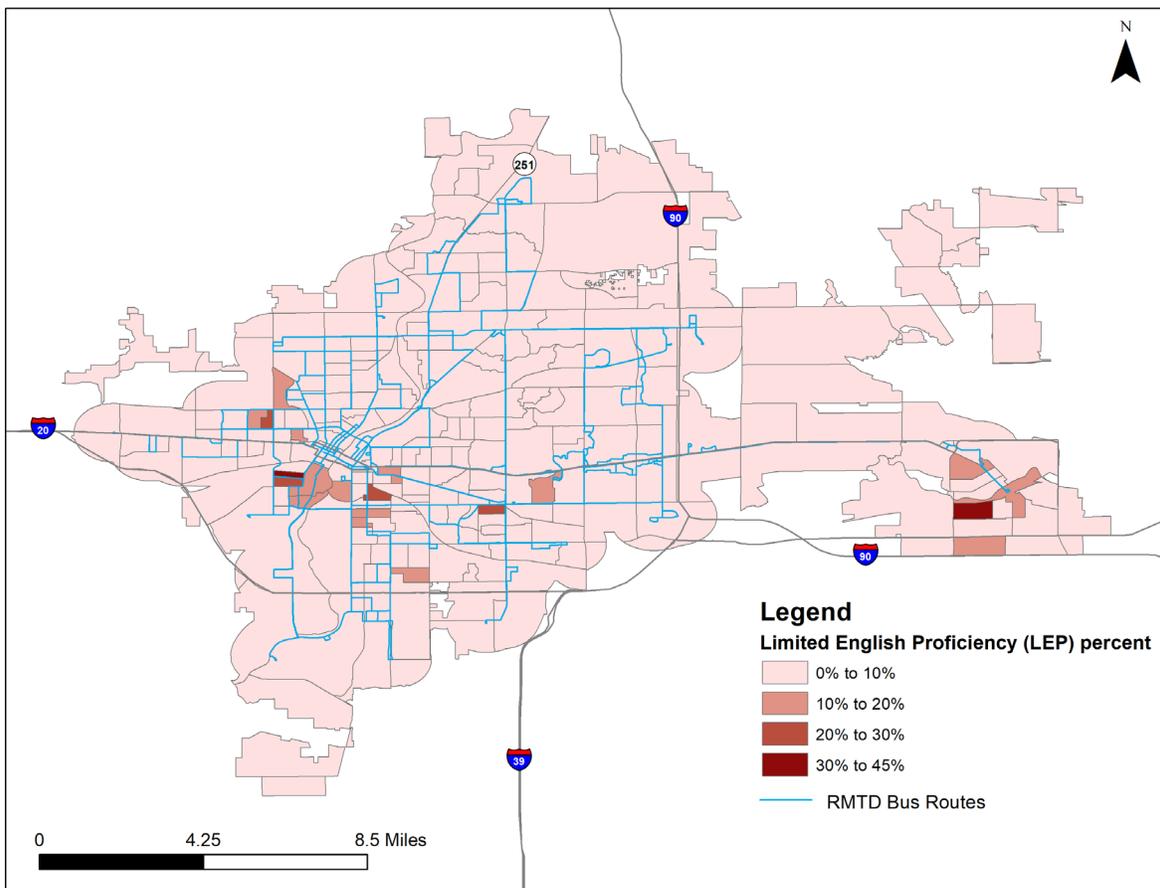
Figure L-2: Map of Racial Minority Population in RMTD Service Area



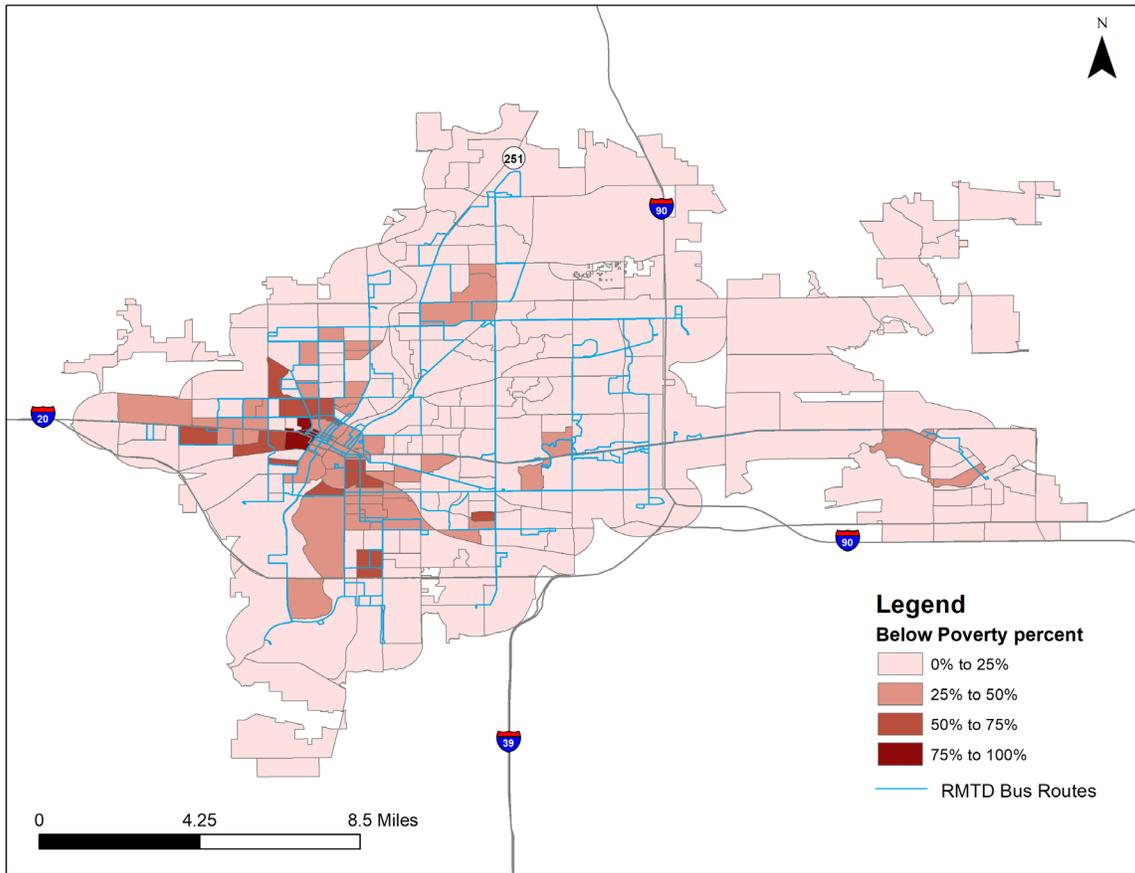
**Figure L-3:** Map of Hispanic or Latino Population in RMTD Service Area



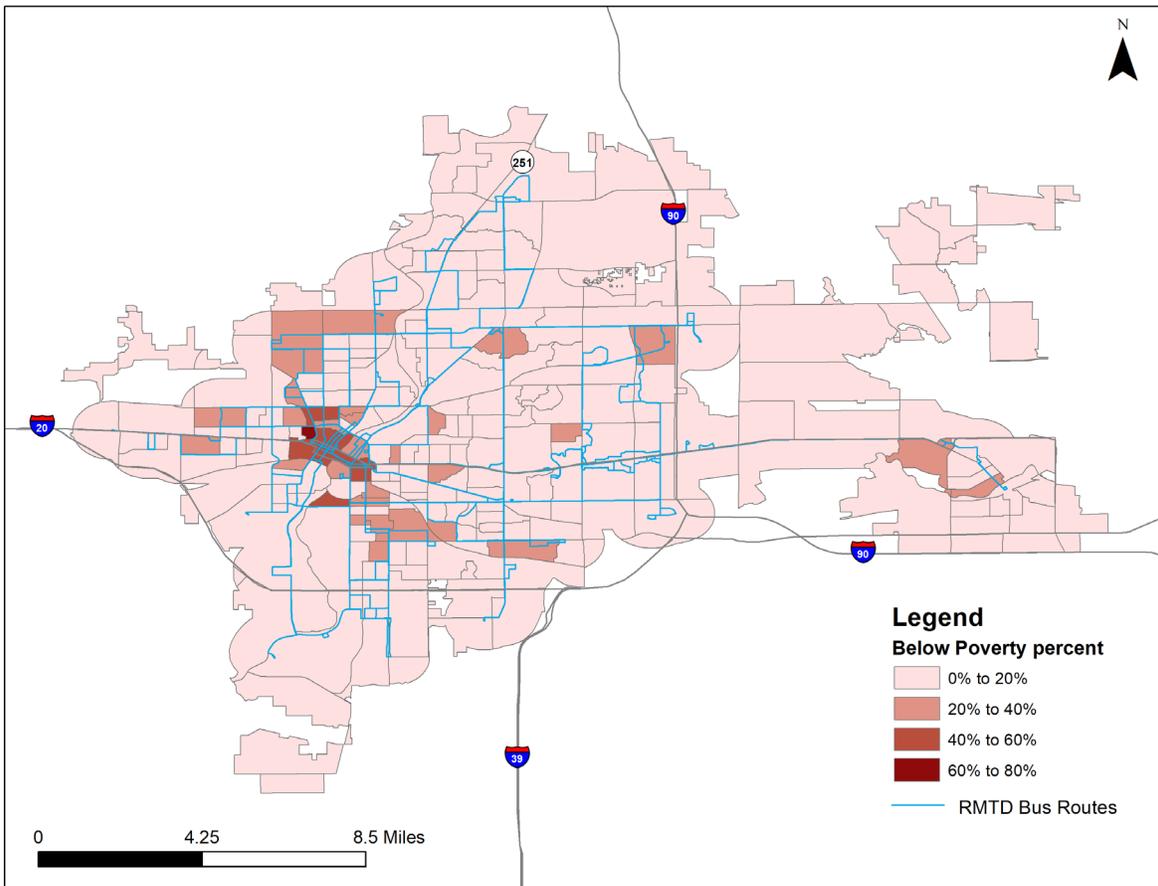
**Figure L-4:** Map of Limited English Proficiency Population in RMTD Service Area



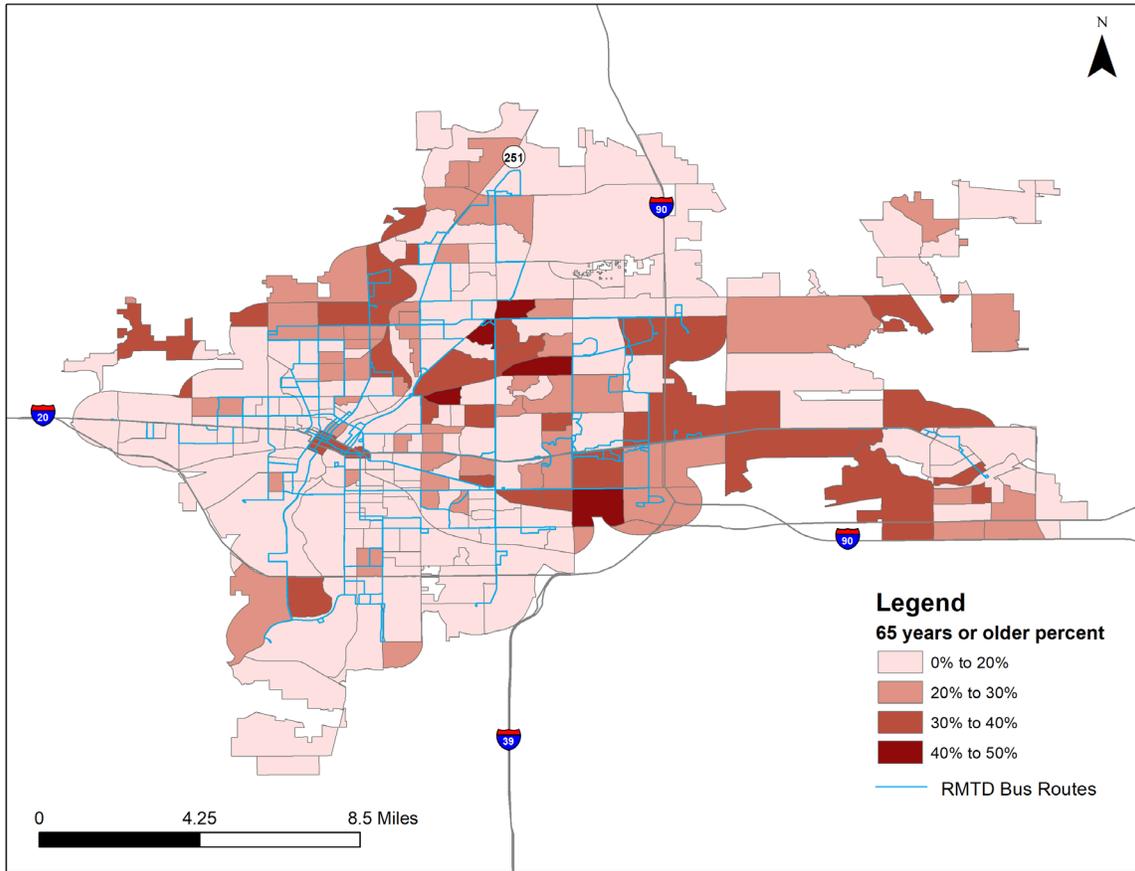
**Figure L-5:** Map of Poverty Population in RMTD Service Area



**Figure L-6:** Map of Zero Vehicle Household Population in RMTD Service Area



**Figure L- 7:** Map of 65 years or older Population in RMTD Service Area



**Figure L-8:** Map of Total Worker Employment Density

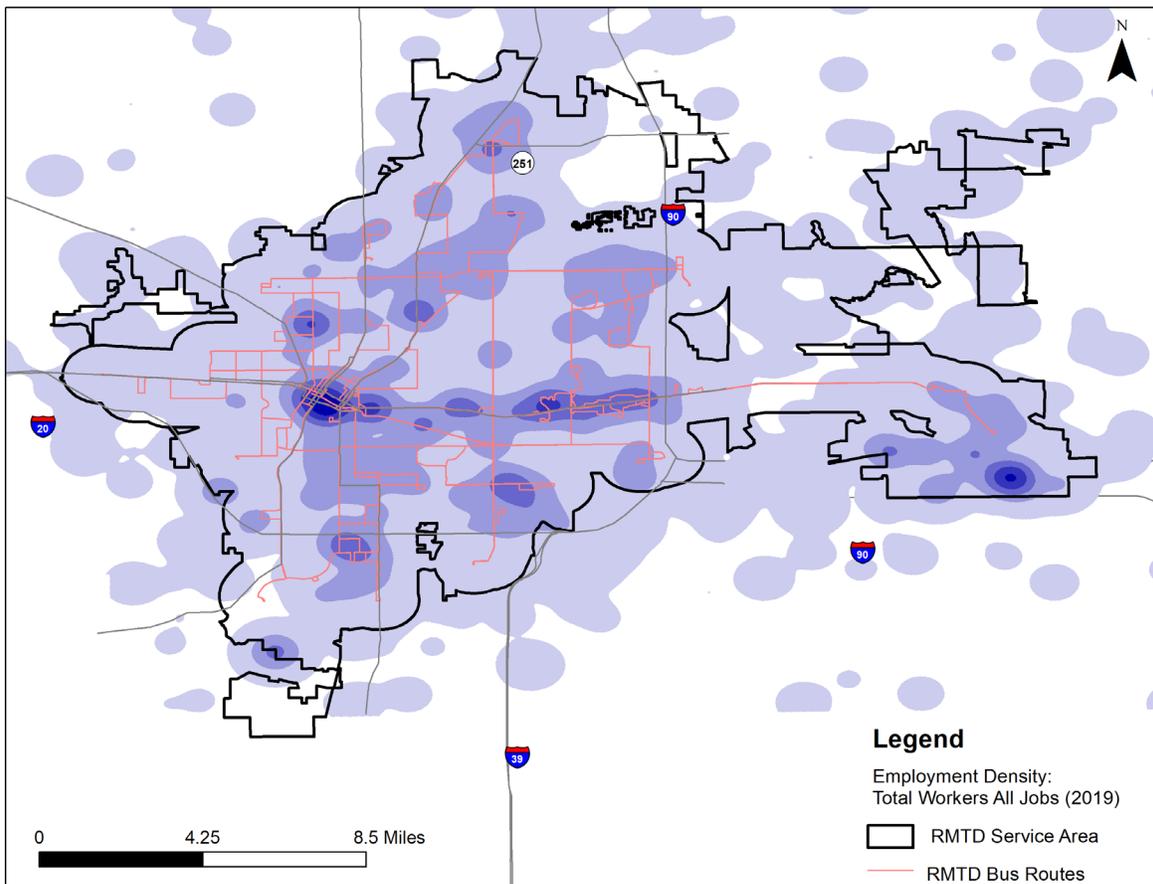


Figure L-9: Map of Black or African American Employment Density

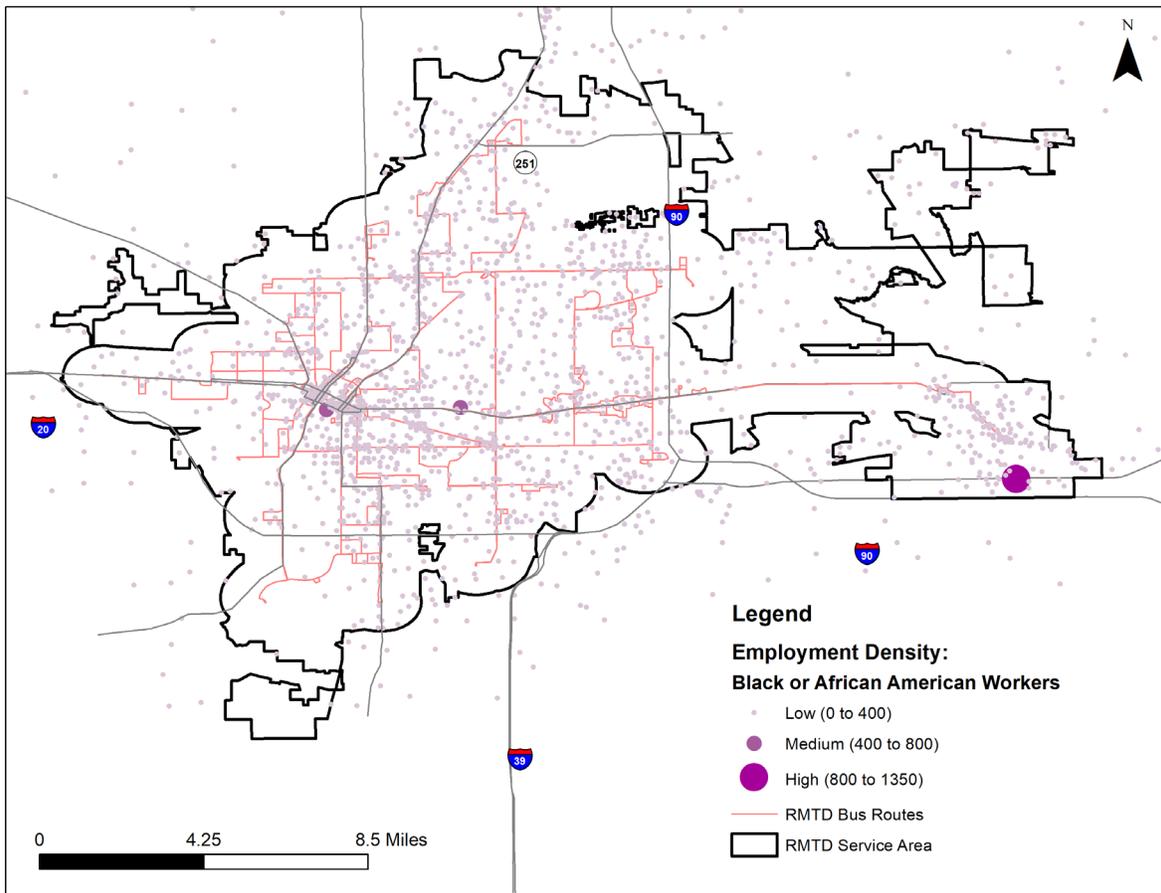


Figure L-10: Map of Hispanic or Latino Employment Density

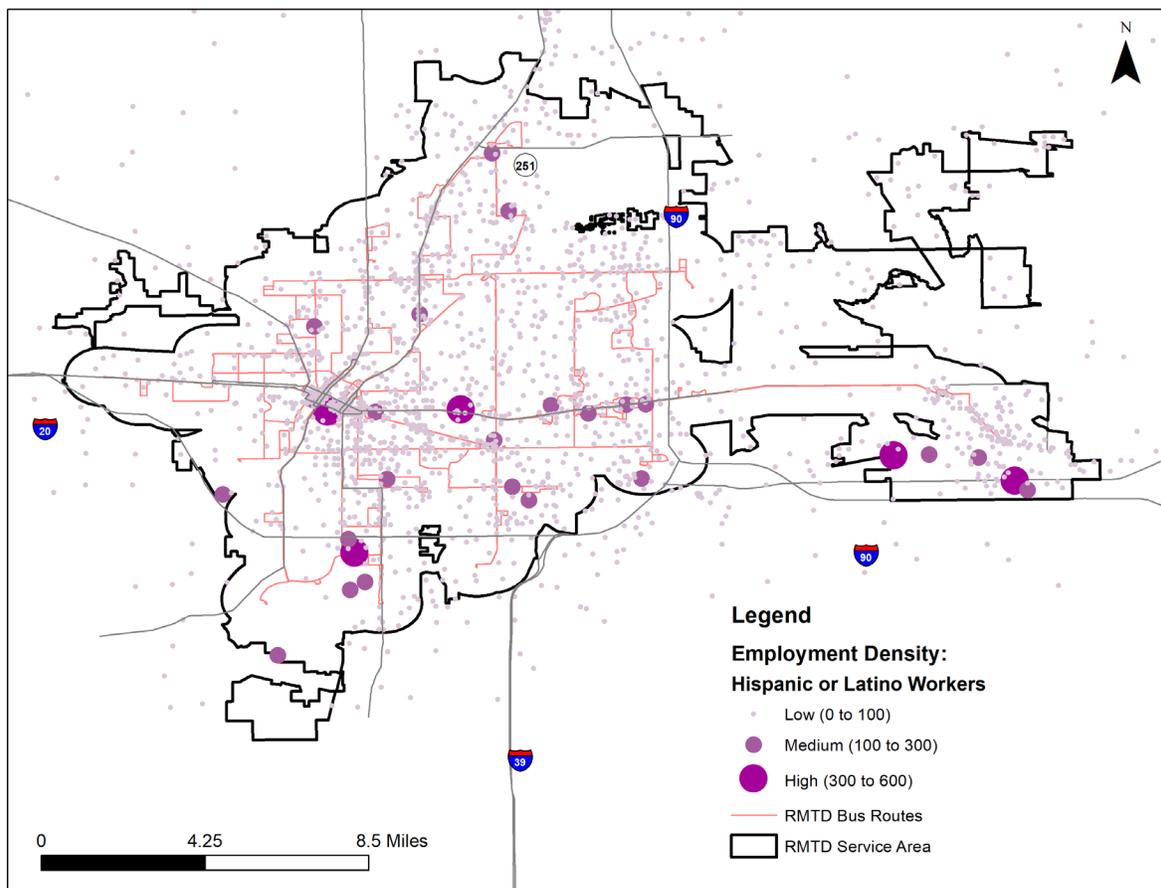


Figure L-11: Map of Asian Employment Density

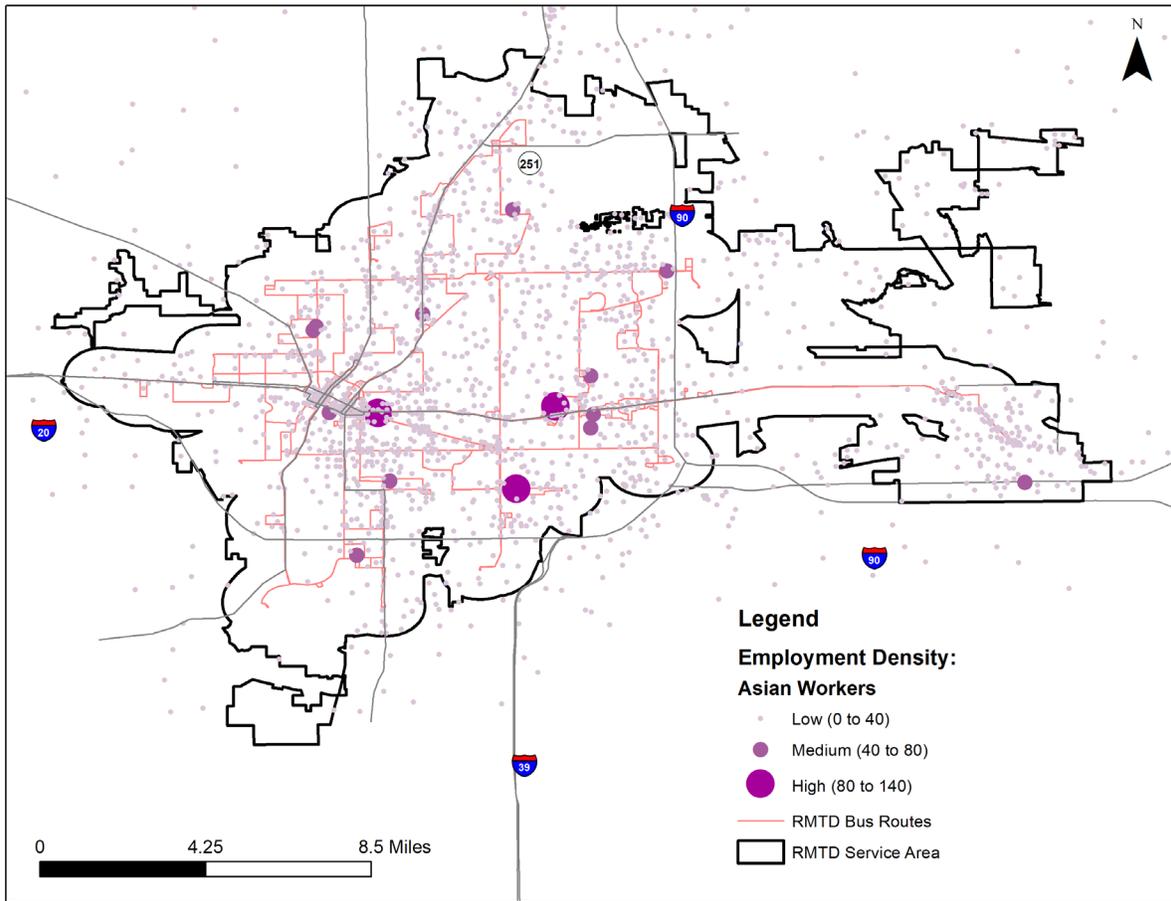
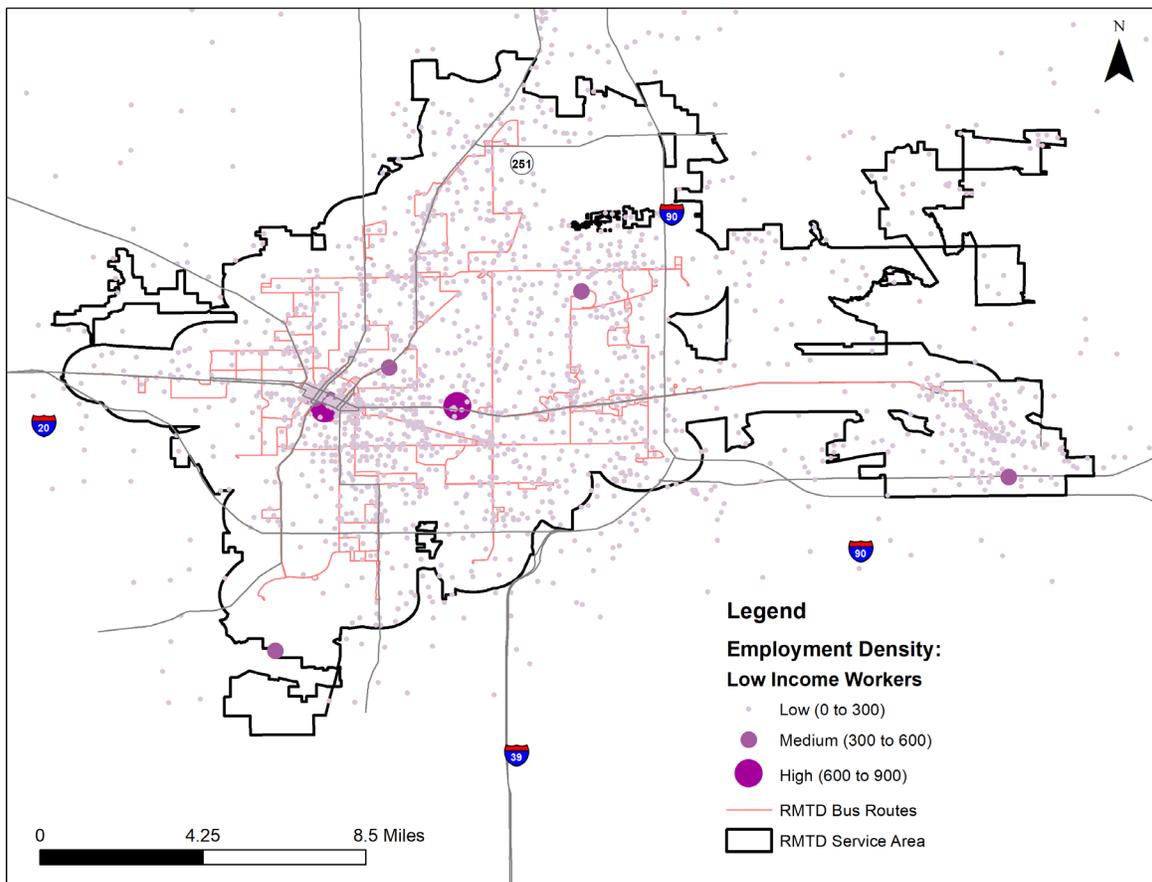


Figure L-12: Map of Low Income Employment Density



**Table L-1:** Demographics by RMTD Route (2017-2021 ACS)

Route	Total	White		Black or African American		Asian		American Indian	
		Total	Percent	Total	Percent	Total	Percent	Total	Percent
1	14,860	7,251	49%	5,931	40%	8	0%	69	0%
2	14,302	5,295	37%	7,356	51%	8	0%	58	0%
3	21,108	11,650	55%	6,516	31%	209	1%	54	0%
4	17,262	11,272	65%	4,273	25%	135	1%	28	0%
5	9,737	4,153	43%	3,446	35%	76	1%	52	1%
6	15,720	7,828	50%	6,253	40%	125	1%	31	0%
7	7,628	4,120	54%	2,103	28%	55	1%	9	0%
11	29,201	19,921	68%	3,909	13%	89	0%	2,413	8%
12	24,112	15,630	65%	4,544	19%	409	2%	133	1%
13	12,497	9,007	72%	2,345	19%	212	2%	37	0%
14	15,841	9,075	57%	3,429	22%	882	6%	83	1%
15	15,624	8,840	57%	4,500	29%	376	2%	29	0%
16/17	72,447	48,663	67%	13,426	19%	2,587	4%	90	0%
18	9,513	7,451	78%	1,102	12%	400	4%	-	0%
19	31,497	21,461	68%	4,417	14%	2,466	8%	89	0%
20	68,000	50,177	74%	9,181	14%	1,936	3%	166	0%
22	34,410	28,248	82%	3,345	10%	508	1%	25	0%
24	13,537	10,352	76%	188	1%	230	2%	12	0%
31-41	33,952	18,666	55%	10,946	32%	248	1%	44	0%
32	27,633	18,490	67%	4,007	15%	2,271	8%	89	0%
33-43	22,344	9,990	45%	8,579	38%	76	0%	102	0%
34-44	38,435	23,644	62%	8,977	23%	530	1%	147	0%
35-45	20,812	11,958	57%	5,377	26%	853	4%	87	0%
36	37,772	28,374	75%	3,530	9%	2,299	6%	156	0%
40	29,312	20,663	70%	3,286	11%	2,466	8%	89	0%

**Table L-1:** Demographics by RMTD Route (2017-2021 ACS) *Continued*

Route	Native Islander		Some Other Race		Two or more races		Hispanic or Latino	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
1	-	0%	312	2%	1,289	9%	2,396	16%
2	-	0%	479	3%	1,106	8%	3,101	22%
3	-	0%	644	3%	2,035	10%	2,515	12%
4	-	0%	291	2%	1,263	7%	1,382	8%
5	15	0%	1,121	12%	874	9%	3,980	41%
6	-	0%	470	3%	1,013	6%	2,648	17%
7	15	0%	695	9%	631	8%	2,192	29%
11	73	0%	1,389	5%	1,407	5%	3,992	14%
12	9	0%	1,563	6%	1,824	8%	5,693	24%
13	9	0%	226	2%	661	5%	896	7%
14	9	0%	753	5%	1,610	10%	3,833	24%
15	9	0%	315	2%	1,555	10%	3,042	19%
16/17	79	0%	2,711	4%	4,891	7%	12,459	17%
18	1	0%	49	1%	510	5%	440	5%
19	73	0%	1,390	4%	1,601	5%	4,286	14%
20	9	0%	2,540	4%	3,991	6%	9,789	14%
22	9	0%	396	1%	1,906	6%	2,586	8%
24	1	0%	2,121	16%	633	5%	4,100	30%
31-41	-	0%	1,036	3%	3,012	9%	4,820	14%
32	72	0%	1,375	5%	1,329	5%	3,956	14%
33-43	15	0%	1,611	7%	1,971	9%	6,252	28%
34-44	24	0%	2,330	6%	2,783	7%	9,191	24%
35-45	9	0%	744	4%	1,754	8%	4,785	23%
36	64	0%	1,178	3%	2,171	6%	4,077	11%
40	73	0%	1,376	5%	1,359	5%	3,963	14%

Racial Minority Threshold	28%
Hispanic Threshold	17%

**Table L-2: Shelters Updated Locations (RMTD)**

Route	Direction	Shelter Location
#1 W. State	Outbound	W. State and Tay ( across from Crusader Clinic)
#1 W. State	Outbound	W. State and Central
#1 W. State	Outbound	W. State between Independence and Sunset
#1 W. State	Outbound	W. State just before Hinkley
#1 W. State	Outbound	W. State and Johnston
#1 W. State	Outbound	W. State and Central
#1 W. State	Outbound	W. State between Royal and Miriam
#1 W. State	Inbound	W. State and Elm Concord Commons
#1 W. State	Inbound	Auburn and Johnston
#1 W. State	Inbound	Mulberry and Johnston (In front of Ponds Funeral)
#1 W. State	Inbound	W. State and Central
#1 W. State	Inbound	W. State and Hinkley
#1 W. State	Inbound	W. State past Tay (Oakwood on N side)
#1 W. State	Inbound	W. State and Johnston
#2nd School Street	Inbound	Auburn and Johnston (cross with W State)
#2nd School Street	Inbound	Auburn and Central (In front of Family Dollar)
#2nd School Street	Inbound	Auburn and Avon (In front of the DMV)
#3 Huffman	Outbound	Halsted in front of podiatrist (NOT RMTD)
#3 Huffman	End of line	Walmart on Central and Riverside
#4 N. Main	Outbound	In front of Beattie Park/N Main Manor
#4 N. Main	Outbound	N. Main and Whitman (in front of Skyrise)
#4 N. Main	End of line	North Towne (#16, #17, #22)
#4 N. Main	Inbound	N. Main and Eddy (in front of Rosecrance)
#4 N. Main	Inbound	Just south of Fulton on Main
#4 N. Main	Inbound	Church and Estwing
#5 Clifton	Outbound	Central and Michigan
#5 Clifton	Inbound	Clifton & Island
#5 Clifton	Inbound	Winnebago and Montague
#6 Kilburn	Outbound	Searles/Collier Gardens
#6 Kilburn	Inbound	Gilbert just before Kilburn
#7 S. Main	Inbound	PCI
#7 S. Main	Inbound	Gem Suburban- S. Main
#7 S. Main	Inbound	La Chiquita- S. Main
#11 E. State	Outbound	State & 4th (Faust Hotel)
#11 E. State	Outbound	State & Summit (UW Hospital)
#11 E. State	Outbound	State & 29th (Valley View/Fairview)
#11 E. State	Outbound	State & Lynmar
#11 E. State	Transfer point	Mulford Village Two Shelters
#11 E. State	Outbound	Fincham outside residence/Spring Ridge

**Table L-2:** Shelters Updated Locations (RMTD) *Countined*

Route	Direction	Shelter Location
#11 E. State	Outbound	Walmart E. State by gas station on Walton
#11 E. State	Inbound	Puri Parkway In front of Schnucks
#11 E. State	Inbound	OSF Strathmoor Emergency Room Area
#11 E. State	Inbound	Roxbury- Ortho Illinois (NOT RMTD)
#11 E. State	Inbound	Roxbury- Medical Arts Bldg (North of E. State)
#11 E. State	Inbound	Rockford University
#11 E. State	Inbound	E. State in front of Subway
#11 E. State	Inbound	E. State & Summit In front of apartments
#11 E. State	Inbound	E. State & 4th across from Faust Hotel
#11 E. State	Inbound	E. State & Rome
#12 Charles Street	Transfer point	Rockford Career College/Forest City Church
#12 Charles Street	Transfer point	Rockford Career College/Forest City Church
#12 Charles Street	Inbound	Buckbee turnoff Harrison Ave
#12 Charles Street	Inbound	22nd and Charles
#12 Charles Street	Outbound	Harrison east of Silentwood (in front of Rosecrance)
#13 Rural	Outbound	Chamberlain (in front of Park Terrace)
#14 7th Street	Outbound	7th and 4th (across from Children's Home & Aid)
#14 7th Street	Outbound	Sandy Hollow (in front of Old Kmart)
#14 7th Street	Inbound	7th Street (next to Crusader Clinic parking lot)
#14 7th Street	Inbound	7th and 2nd- Valkommen Plaza
#15 Kishwaukee	Outbound	Seminary & Division
#15 Kishwaukee	Outbound	Kishwaukee & Ranger
#15 Kishwaukee	Outbound	Sandy Hollow
#15 Kishwaukee	Inbound	Kishwaukee & Ranger
#15 Kishwaukee	Inbound	Seminary @ Brewington Oaks
#16 N. Loop	Outbound	Halsted and Rockton
#17 S. Loop	Inbound	Schnucks parking lot



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