

Challenge Unlimited, Inc.

Title VI Program Plan

Document Revised:

May 2025

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A. Title VI Assurances

Challenge Unlimited Inc agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

Challenge Unlimited Inc assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **Challenge Unlimited Inc** further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

Challenge Unlimited Inc meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Residential Options Inc and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

- 1. Mission of Challenge Unlimited Inc**
- 2. History of Challenge Unlimited Inc since 1959**
- 3. Regional Profile (regional population; growth projection)**
- 4. Population served (in relation to regional population)**
- 5. Service area (include map, with any routes utilized)**
- 6. Governing body make-up (include terms of office)**

C. Notice to the Public

Notifying the Public of Rights under Title VI/ADA

Challenge Unlimited Inc posts Title VI/ADA notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

Challenge Unlimited Inc operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

Challenge Unlimited Inc operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans with Disabilities Act of 1990.

For more information on the **Challenge Unlimited Inc** Title VI program, and the procedures to file a complaint, contact Misty, Manager of Compliance & Staff Relations in Human Resources at 618-465-0044, ext 1036 or mwalker@cuinc.org; or Susan, Director of Skills Training, ext 1144 or swild@cuinc.org or visit our administrative office at 4 Emmie Kaus Lane, Alton IL 62002. For more information visit www.cuinc.org.

If you believe you have been discriminated against on the basis of race, color, or national origin by **Challenge Unlimited Inc**, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact: Misty in Human Resources or Susan in Skills Training at 618-465-0044.

How to file a Title VI/ADA complaint with Challenge Unlimited Inc:

1. You may ask for the complaint form to be emailed, mailed or picked up at the address above.
2. In addition to the complaint process at **Challenge Unlimited Inc**, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust St, Suite 404, Kansas City, MO 64106 or telephone 816-329-3920.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.

If information is needed in another language, contact 618-465-0044.

D. Procedure for Filing a Title VI Complaint

See sample
**Title VI
Complaint Form**
ATTACHMENT 2

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of **Challenge Unlimited Inc's** programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by **Challenge Unlimited Inc** may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the **Challenge Unlimited Inc** Title VI Complaint Form at www.cuinc.org, or request a copy by writing to: Human Resources, 4 Emmie Kaus Lane, Alton IL 62002. Information on how to file a Title VI complaint may also be obtained by calling **Challenge Unlimited Inc** at 618-465-0044.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Attn Director of Human Resources at **Challenge Unlimited Inc**.

COMPLAINT ACCEPTANCE **Challenge Unlimited Inc** will process complaints that are complete. Once a completed Title VI Complaint Form is received, **Challenge Unlimited Inc** will review it to determine if Title VI has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by a Manager, Director or VP of Human Resources.

INVESTIGATIONS: **Challenge Unlimited Inc** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Human Resources may contact the complainant. Unless a longer period is specified by Human Resources, the complainant will have ten (10) days from the date of the letter to send requested information to the Human Resources investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with **Challenge Unlimited Inc's** determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. **Challenge Unlimited Inc** will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, **Challenge Unlimited Inc's Human Resources department** will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact Human Resources at 4 Emmie Kaus Lane, Alton IL 62002 or at 618-465-0044.

**E. Monitoring Title VI Complaints, Investigations, Lawsuits
and Documenting Evidence of Agency Staff Title VI Training**

See sample
Title VI
Self-Survey Form
ATTACHMENT 3

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **Challenge Unlimited Inc's** complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

Challenge Unlimited Inc's staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to stakeholder participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold stakeholder meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low-income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves the budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low-income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Challenge Unlimited Inc ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **Challenge Unlimited Inc's** Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, **Challenge Unlimited Inc** provides the following:

- a. Title VI non-discrimination notice on agency's website.
- b. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- c. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2023 Title VI Program Public Engagement Process

Challenge Unlimited Inc will conduct a Public Engagement Process for the 2025 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Challenge Unlimited Inc will provide briefings to the Board of Directors and Advisory Bodies.

Challenge Unlimited Inc will provide a 30 day public comment period to provide opportunities for feedback on the 2025 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

Summary of 2025 Public Outreach Efforts

G. Language Assistance Plan

Challenge Unlimited Inc Limited English Proficiency Plan

This Limited English Proficiency (LEP) Plan has been prepared to address **Challenge Unlimited Inc's** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

Challenge Unlimited Inc operates buses to transport adults with disabilities in Madison, St Clair, Jersey and Calhoun counties to take them to and from home to the Challenge Unlimited skills Training centers.

Challenge Unlimited Inc has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by **Challenge Unlimited Inc**. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, **Challenge Unlimited Inc** undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the **Challenge Unlimited Inc** service area are proficient in the English language. Based on 2012 Census data, [52%] of the "*foreign-born*" population in the state of Illinois, five years of age and older speak English "*less than very well*" – a definition of limited English proficiency

LEP Population in Challenge Unlimited Inc Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector Alton IL	Service Area Sector Swansea IL	Service Area Sector [1]	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over					
Speak English "less than very well"					
Spanish	0	0			
Speak English "less than very well"					
Other Indo-European	0	0			
Speak English "less than very well"					
Asian and Pacific Island	2	0			
Speak English "less than very well"					
All Other	0	0			
Speak English "less than very well"					

2. Frequency of Contact by LEP Persons with Challenge Unlimited Inc's Services:

The **Challenge Unlimited Inc** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, **Challenge Unlimited Inc** has, on average, [**zero requests**] for an interpreter. **Challenge Unlimited Inc** averages [**zero**] phone calls per month.

<p style="text-align: center;">LEP Staff Survey Form</p> <p>Challenge Unlimited Inc is studying the language assistance needs of its riders so that we can better communicate with them if needed.</p> <ol style="list-style-type: none"> How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them? DAILY WEEKLY MONTHLY LESS THAN MONTHLY What languages do these passengers speak? What languages (other than English) do you understand or speak? Would you be willing to serve as a translator when needed?
--

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	Phillipino (Asian)
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by **Challenge Unlimited Inc** to LEP persons:

Outreach activities, summarized in **Challenge Unlimited Inc's** Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: **Challenge Unlimited Inc**

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to **Challenge Unlimited Inc** and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) **Challenge Unlimited Inc** has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

Challenge Unlimited Inc will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to **Challenge Unlimited Inc** staff:

1. Information on **Challenge Unlimited Inc** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **Challenge Unlimited Inc's** Title VI Plan requirement.

Challenge Unlimited Inc will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **Challenge Unlimited Inc** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether **Challenge Unlimited Inc** 's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **Challenge Unlimited Inc** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **Challenge Unlimited Inc's** failure to meet the needs of LEP individual.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Hispanic /Latino	African American	Asian American	Native American	Total
Board of Dir.	9	0	1	0	0	10
Senior Exec's	4	0	3	0	0	7
Population Committee						100%
Access Committee						100%
Citizens Advisory Council						100%

Description of efforts made to encourage minority participation on committees:

- Todd Nickel, Fleet & Facilities Manager at Challenge Unlimited participates in committee that includes grant involved members to discuss help with transportation for public entities when Challenge drivers are available to assist.

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

Challenge Unlimited Inc does not have any subrecipients.

OPTION B

Primary recipients should provide subrecipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- Direction regarding obtaining demographic information of population served by subrecipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

Challenge Unlimited Inc does not have any subrecipients.

OPTION B

Primary recipients must monitor subrecipients.

- Non-compliant subrecipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all subrecipients are complying with the general and specific requirements.
- Collect and review subrecipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is equitably provided.

K. Equity Analysis of Facilities

OPTION A

Challenge Unlimited Inc has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

OPTION B1

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

OPTION B2

_____ performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

_____ developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, _____ mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, the “two-test” exercise was conducted and it was determined that the facility [facilities] could proceed, despite disparate impact, due to a “substantial legitimate justification” to meet a goal that is integral to the agency’s institutional mission. In addition, no comparable effective alternative location(s) would result in less disparate impact.

L. System-Wide Service Standards and Policies*

****applies to all fixed route providers (including those that do not meet volume threshold)***

**Template for System-Wide Service Standards (1. 2. 3. 4.)
is presented in detail
in FTA Circular 4702.1B Appendix G.**

**Template for System-Wide Service Policies (1. 2.)
is presented in detail
in FTA Circular 4702.1b Appendix H.**

APPENDIX G

SERVICE STANDARDS (REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)

Background

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.

Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak vs. off-peak times, and for different modes of transit.

Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

On-time performance for each mode: A measure of runs completed as scheduled.

Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

Vehicle Load Standards

1. Expressed in writing

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 15' mini-bus (largest bus Challenge uses).

2. Expressed in tabular format

Vehicle Type		Average Person Capacity			
		Seated	Standing	Total	Max Load Factor
15 ft Bus		28	0	28	1

Vehicle Headway Standards

1. Expressed in writing

Service operates on a direct route for a specific list of adults with disabilities with buses traveling between 6:45 am to 9:45 am and again from 2:00 pm to 5:00 pm Monday through Friday, with occasional outings on an as needed basis on Saturdays and/or Sundays.

Scheduling involves the consideration of a number of factors including: ridership availability, Group home readiness for pick-up, any special safety fastening assistance for wheelchair users, any health or safety behaviors on the bus that may need to be addressed, relationship to major transportation developments/construction re-routing or traffic stoppages.

POLICY HEADWAYS AND PERIODS OF OPERATION

Expressed in writing

Ninety-five (95) percent of Challenge Unlimited's buses complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.

Service Availability Standards

Expressed in writing

Challenge Unlimited buses pick up and drop off riders within the same block as their home address.

APPENDIX H

SERVICE POLICIES *(REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)*

Background

FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

- Vehicle Assignment
- Transit Amenities

Vehicle Assignment Policy

Expressed in writing

Vehicles will be assigned to the Skills Training Centers in Alton IL and Swansea IL such that the average age of the fleet serving each center does not exceed “10” years. Wheelchair loading assistance buses are available for both locations, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet.

Transit Amenities Policy

Expressed in writing

All buses are equipped with seat belts, fire extinguishers, phones, radios and air conditioning.

NOTE: Challenge Unlimited does NOT operate 50 or more fixed routes, nor serve 200,000+ population.

M. Requirement to Collect and Report Demographic Data*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

Template for Demographic Profile and Travel Patterns
is presented in detail
in FTA Circular 4702.1B Appendix I.

N. Requirement to Monitor Transit Service*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

Template for Demographic Profile and Travel Patterns
is presented in detail
in FTA Circular 4702.1B Appendix J.

O. Service and Fare Equity Analysis*

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

Major Service Change and Impact Policies

The Board of Directors of _____ has established formal hearing procedures for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within _____'s transit system, **increasing or decreasing the number of service hours operated on a route by 25% or more, or routing changes that alter 25% or more of a route's path.** Minor changes to an existing route shall not constitute a "major change in route".

A service change that is deemed a “Major Service Change” based on the description above would require a Title VI analysis.

Service changes that are deemed as a “Major Service Change” will also be required to have disparate impact analysis and disproportionate burden analysis done.

The _____ Title VI Program includes disparate impact and disproportionate burden policies.

Challenge Unlimited Inc’s Disparate Impact and Disproportionate Burden Policy

Adverse Effects: Major Service Change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined by demographic analysis of proposed changes and U.S. Census data and transit rider data.

What is Fair?: [EXAMPLE] Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the “four-fifths” rule. This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is [20%]. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact on minority populations: If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Disproportionate burden on low income populations: If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

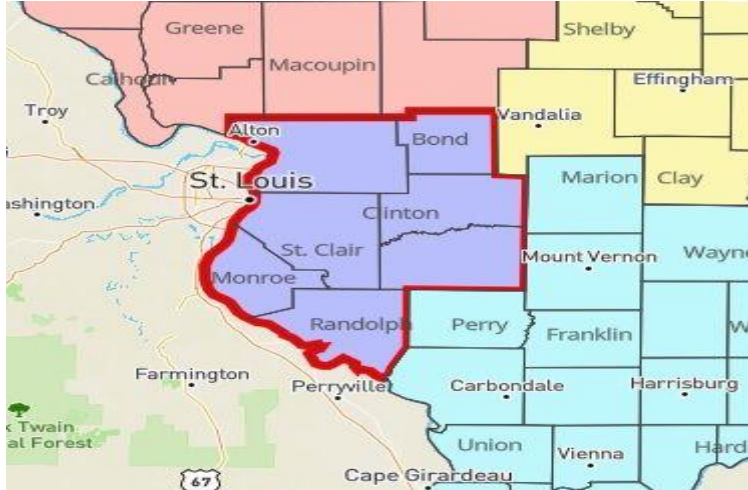
**Template for Service and Fare Equity Analysis
is presented in detail
in FTA Circular 4702.1B Appendix K.**

Attachment 1

Agency Information

Challenge Unlimited Inc is a Community Rehabilitation Provider offering vocational and social rehab skills training and opportunities, including transportation services to and from home to the skills training centers for adults with intellectual and developmental disabilities. The nonprofit corporation was originally founded as Specialized Services, Inc., (now Challenge Unlimited) formed by concerned parents of children with disabilities. The parents wanted their adult children to participate in some form of productive activity and hopefully gain vocational experiences that would lead to employment. Specialized Services, Inc., opened its doors to provide services to six individuals. It was initially funded by contributions from parents, concerned citizens, and local businesses. With a growing need, Specialized Services secured a grant from the Department of Mental Health and grew rapidly to 50 participants. A new building was purchased to provide additional services to individuals with disabilities.

Transportation is provided to **167** clients with disabilities to attend one of the Skill Training Centers in Alton IL (Madison county) or Swansea IL (St Clair county). Some clients are picked up in Jersey and Calhoun counties in IL as well. Clients served are those determined eligible by the State of Illinois.



Challenge Unlimited is led by President & CEO, Charlotte Hammond and the governing body is a Board of Directors consisting of nine volunteer members. See website, www.cuinc.org, for more information on the Leadership team and Board of Directors.

Attachment 2

CHALLENGE UNLIMITED INC TITLE VI/ADA COMPLAINT FORM

"No person in the United States shall, on the basis 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."

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Manager of Compliance & Staff Relations
Challenge Unlimited Inc
4 Emmie Kaus Lane, Alton IL 62002
mwalker@cuinc.org or fax: 618-474-4620

PLEASE PRINT

1. Complainant's Name:
a. Address:
b. City: State: Zip Code:
c. Telephone (include area code): Home () or Cell () Work () - () -
d. Electronic mail (e-mail) address:
Do you prefer to be contacted by this e-mail address? () YES () NO
2. Accessible Format of Form Needed? () YES specify: () NO
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4
4. If you answered NO to question 3 above, please provide your name and address.
a. Name of Person Filing Complaint:
b. Address:
c. City: State: Zipcode:
d. Telephone (include area code): Home () or Cell () Work () - () -
e. Electronic mail (e-mail) address:
Do you prefer to be contacted by this e-mail address? () YES () NO
5. What is your relationship to the person for whom you are filing the complaint?
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI)

- () Disability (class protected by ADA)
 () Other (please specify)

continued

TITLE VI COMPLAINT FORM – PAGE 2

8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone: () -	
Address:		
City:	State:	Zip Code:

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

Signature and date is required:

 Signature

 Date

If you completed Questions 4, 5 and 6, your signature and date is required:

 Signature

 Date