



**Illinois Department of Transportation**

Title VI Implementation Plan and  
Assessment for the  
Federal Highway Administration  
FY 2026

IDOT  
Title VI Plan FFY2026

**TITLE VI PROGRAM PLAN**  
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**Executive Summary**

This Title VI Program Plan reflects the Illinois Department of Transportation's effort to comply with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Federal Highway Act of 1973, and all related regulations and statutes. Included in this plan are the following:

- Title VI policy of the Illinois Department of Transportation (IDOT);
- Updated list of accomplishments and goals;
- The steps IDOT takes to ensure compliance with regard to Title VI within its departments and to subrecipients;
- The selection and application process for subrecipients;
- IDOT's subrecipient program requirements;
- The complaint procedure for anyone who believes that IDOT or one of its subrecipients have unlawfully discriminated in violation of Title VI;
- IDOT's Language Access Plan; and
- Other relevant information.

IDOT is committed to a nondiscrimination policy and will continue to monitor the efforts within IDOT to comply with Title VI and prevent discrimination while also monitoring the compliance of subrecipients with Title VI.



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Marjorie Hughes  
Bureau Chief of Civil Rights  
Title VI Coordinator  
Illinois Department of Transportation

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**Title VI Nondiscrimination Policy Statement**



**Illinois Department of Transportation**

Office of the Secretary  
2300 South Dirksen Parkway / Springfield, Illinois / 62764  
Telephone 217/782-5597

**Title VI Nondiscrimination Policy Statement**

The Illinois Department of Transportation (IDOT) is committed to a policy of nondiscrimination. IDOT is committed to compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related regulations and statutes. Title VI of the Civil Rights Act of 1964 provides that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d. The Federal Highway Administration through an amendment to the Federal Highway Act of 1973, added discrimination on the basis of sex to Title VI protections and regulations. 23 U.S.C. § 324.

IDOT will make every effort to follow environmental justice principals in order to ensure that the impact of its programs, policies, and activities will not discriminate against minority and low-income populations. In addition, IDOT will provide meaningful access to services for persons who are Limited English Proficient.

In the event IDOT distributes financial assistance to a subrecipient, IDOT will include Title VI language in all written agreements and will monitor for compliance. Financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

The ultimate responsibility of ensuring that IDOT is compliant with Title VI rests with the Secretary of IDOT. The Secretary has delegated this authority to the Title VI Coordinator, who is in the Civil Rights Bureau of the Office of Business and Workforce Diversity for IDOT. The Title VI Coordinator has the overall responsibility for the initiating, implementing, and monitoring IDOT’s Title VI programs and activities and preparing reports as required by 49 CFR part 21.

Signed by:

A handwritten signature in black ink, appearing to read 'Giabiagi'.

03580F3866F64CB...  
Gia Biagi, Secretary

02/27/26 | 12:11 PM CST

Date

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### **Nondiscrimination Mission Statement**

The Illinois Department of Transportation (IDOT) wants to ensure that its managers, staff, contractors, and other service providers are informed, educated, and knowledgeable about the provision of Title VI of the Civil Rights Act of 1964, which requires that all individuals regardless of their race, color, or national origin have the opportunity to participate in or receive benefits from IDOT programs, services or activities receiving Federal financial assistance.

These procedures do not preclude a complainant from filing a formal complaint with other state or Federal agencies or seeking redress through private action. The procedures are part of an administrative process that does not provide for remedies, including punitive damage or compensatory remuneration for the complaint.

### **Americans with Disabilities Act (ADA) Information**

This material can be made available in an alternate format by emailing the Bureau of Civil Rights at [dot.ada.complaint@illinois.gov](mailto:dot.ada.complaint@illinois.gov) or by calling (217)782-2762 or TTY (866)273-3681.

### **Translation Services**

If you have difficulty understanding English, you may, free of charge, request language assistance services by calling (312)793-1356 or email IDOT at [IDOT.LAP@Illinois.gov](mailto:IDOT.LAP@Illinois.gov).

### **Title VI Requirements**

Title VI of the Civil Rights Act of 1964 states that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. Under Title VI and the Civil Rights Restoration Act of 1987, federal financial assistance recipients must take affirmative steps to ensure that prohibited discrimination does not occur in any of the recipient's programs or activities, regardless of funding source.

To that end, IDOT is committed to:

- Adopting policies and procedures that support developing and implementing a functional Title VI program.
- Ensuring meaningful public participation in transportation decision-making, consistent with the guiding principles/strategies outlined in IDOT's Community Engagement Plan.
- Preventing, minimizing, mitigating, or correcting high and adverse impacts from IDOT's programs or activities.
- Monitoring the activities of local public agencies and other sub-recipients through periodic oversight activities such as desk reviews and onsite reviews to ensure their compliance with all Title VI requirements.
- Providing meaningful language access services, as appropriate, to LEP individuals.
- Conducting department federal program area reviews to collect and analyze data that may be useful in identifying and addressing any trends or patterns of discrimination.
- Processing Title VI complaints in a timely manner.

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## **IDOT Title VI Accomplishments FY 2025**

### **A. Translation of Documents and Language Access Training**

IDOT began working with its vendor to translate Civil Rights documents into multiple languages, which are being uploaded to the webpage as flat PDFs and downloadable versions.

IDOT developed online training for IDOT employees regarding contacts with LAP and LEP individuals. The training focuses on interacting with LEP individuals and how to use IDOT resources to engage with them by successfully utilizing interpretation and translation services.

### **B. Continued Focus on Staffing**

IDOT hired a Bureau Chief that is currently service as the interim Title VI Coordinator, while it works on filling the Title VI Coordinator position, which was posted in October, 2025.

IDOT also hired 2 Civil Rights Specialists, who are responsible for civil rights related investigations, including those related to Title VI allegations.

### **C. Training for Employees**

IDOT regularly provides Title VI training to employees during their new employee orientation with the Bureau of Civil Rights. The Limited English Proficiency (Language Access Plan) training is also included in new employee orientation and recurring refresher training is being developed.

## **IDOT Title VI Goals for Federal Fiscal Year 2026**

Continue to monitor and update changes as needed to the IDOT website, specifically the Bureau of Civil Rights Title VI web pages, including translated documents for public use.

Complete hiring of Title VI Specialist position.

Conduct compliance reviews of FHWA subrecipients.

Conduct training for subrecipients regarding their obligations to comply with Title VI, including on the forms listed in the appendix, which include a checklist and assurances for subrecipients and MPOs. BCR will continue to conduct internal Title VI compliance training for staff and provide training at meetings held through the different offices at IDOT.

Conduct internal program reviews for Title VI compliance (2 Highways Bureaus). Ensure IDOT incorporates Title VI policy and mission statements into its procedures and manuals. Additionally, by conducting Title VI/Nondiscrimination Program Process Reviews, BCR's Title VI program ensures that Title VI requirements are included in program area directives and that Title VI/Nondiscrimination statements are included in contracting, procurement, and other transmissions. Ensure Title VI/Nondiscrimination clauses from the USDOT Standard Title VI Assurances are included in all contracts as mandated by Title VI of the Civil Rights Act of 1964, including Appendices A through E.

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Release our LEP and Language Access Plan training for all IDOT employees. Translate documents identified as vital into multiple languages (Arabic, Simplified Chinese, Croatian, French, German, Italian, Korean, Serbian, Spanish, Tagalog, and Hindi) that meet the safe harbor provisions of 5% or 1,000 and continue to identify vital documents for translation.

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**IDOT Organizational Structure**

Under the umbrella of IDOT are the following offices: Offices of the Secretary, Business and Workforce Diversity; Chief Counsel; Finance and Administration; Communications; Internal Audit; Legislative Affairs; Planning and Programming; Intermodal Project Implementation; Highways Project Implementation and Program Development.

**Organization, Staffing, Structure:**

The IDOT Secretary of Transportation is responsible for ensuring the implementation of the Agency's Title VI program. In agreement with 23 C.F.R. § 200.9 (b), the Secretary has established and staffed Bureau of Civil Rights (BCR) to fulfill and implement all federal civil rights requirements. The Bureau Chief of the BCR is responsible for the overall management and implementation of the Title VI program on behalf of the Secretary. The day-to-day administration of the program lies with the Title VI specialist under the direct supervision of the Title VI Coordinator. The Title VI Coordinator reports directly to the Bureau Chief of BCR and has access and interaction with the Secretary of IDOT on all matters pertaining to the Title VI program.

Organizationally and functionally, the BCR is a part of the Office of Business and Workforce Diversity. The organizational charts located in Appendix Q and Appendix R reflect the structure of BCR and the organizational structure of IDOT. The Bureau Chief of BCR has a dotted line reporting structure to the Secretary of Transportation.

The reporting structure for the Title VI Coordinator has not changed. For day-to-day work assignments, the Title VI Coordinator reports to the Bureau of Civil Rights Bureau Chief. The Title VI Coordinator also has direct access to the Secretary of Transportation to discuss any vital Title VI-related matters. A copy of the organizational chart is also attached to this document.

**Title VI Program**

The Title VI Program group is responsible for the administration of the statewide Title VI program. Internally, the unit is responsible for statewide guidance, technical assistance, and training on Title VI, as well as the development and implementation of IDOT's FHWA/FTA/FMCSA corrective action plan items, special emphasis areas (e.g., a FHWA/FTA placed emphasis on any special program) and language assistance policy for Limited English Proficiency (LEP). Externally, IDOT's Title VI unit provides guidance, technical assistance and training to local public agency managers, contractors, and other sub-recipients, as well as monitors these entities for compliance with federal guidelines. Title VI program staff is comprised of a Title VI Specialist located at IDOT's Chicago Office. The Specialist handles the day-to-day Title VI responsibilities of monitoring compliance, conducting training, and gathering Title VI data for the Annual Goals and Accomplishments (G&A) Report.

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## **Organizational Responsibilities**

**Office of the Secretary** guides all IDOT's activities including personnel administration and the development and implementation of transportation policies, programs and activities. The Secretary carries out that accountability by delegating the appropriate authority and responsibility to the directors of the various divisions and offices.

**Office of Business and Workforce Diversity (OBWD)** administers IDOT's Disadvantaged Business Enterprise (DBE) program in accordance with regulations from the U.S. Department of Transportation (DOT). OBWD ensures that DBEs have an equal opportunity to receive and participate in DOT-assisted contracts. In addition, OBWD ensures nondiscrimination in the awarding and administration of DOT-assisted contracts and is committed to creating a level playing field on which DBEs can compete fairly for DOT-assisted contracts.

- **The Bureau of Small Business Enterprises (SBE)** provides overall direction of the Department's various programs for small business utilization. These programs include the federally mandated highway construction program for Disadvantaged Business Enterprises (DBE); and similar programs arising out of the state's Business Enterprises Program for minorities, females and persons with disabilities. The Bureau also directs departmentwide efforts to ensure contractor compliance with the work force utilization goals and labor wage laws and regulations.
- **The Bureau of Civil Rights (BCR)** develops and implements the Department's Equal Employment Opportunity and Affirmative Action programs and ensures its compliance with Federal and/or state law. BCR also provides counseling and informational services to applicants and employees. Further, BCR investigates allegations of discrimination in employment and services, and assists the Office of Chief Counsel and the Illinois Attorney General's Office in preparing Departmental responses to allegations of discrimination.

**Office of Chief Counsel (OCC)** provides legal counsel to the Department on both policy issues and proposed actions affecting any of its operating divisions or staff offices. OCC is also responsible for the prosecution of all Departmental litigation in cooperation with the Attorney General. OCC administers tort liability claims, property damage claims and uncollectible receivables. It also processes lien and bond claims against contractors. In addition, OCC coordinates the purchase and service of all insurance policies and administers the Department's self-insurance program.

**Office of Communications (OOC)** provides the traveling public with accurate real-time information on transportation projects that affect the areas in which they live and conduct business. OOC has a primary goal of ensuring IDOT policies, actions, and goals are consistently communicated, supported, and enhanced throughout the Department and the state of Illinois.

**Office of Finance and Administration (OFA)** is responsible for developing and administering the Department's budget; managing the departmental personnel systems; providing accounting and auditing functions to ensure sound fiscal management; providing centralized business services functions and IDOT facilities management; and providing management information capabilities required to meet management and engineering needs.

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**Office of Internal Audit (OIA)** provides independent internal audit services to IDOT as required by the Fiscal Control and Internal Auditing Act (FCIAA). OIA is responsible for conducting system development reviews of various information technology projects. The office also tracks management's implementation of its corrective action plans in response to weaknesses noted during internal audits to ensure that appropriate action is taken in a timely manner.

**Office of Legislative Affairs (OLA)** guarantees that IDOT policies, actions and goals are consistently communicated, supported and enhanced through interaction with legislative contacts, state and local officials, and private organizations to guarantee that Illinois constituents' needs are serviced well.

**Office of Planning and Programming (OP&P)** develops plans and programs aimed at improving the state's transportation system. OP&P works with metropolitan planning organizations to develop plans and programs for urban transportation, monitors the physical condition of the transportation system, assesses the need for improvement, and evaluates proposals for major investments in the system. OP&P, cooperatively with Intermodal Project Implementation, administers the state rail-passenger and freight-assistance programs and develops Federal policy and legislative agenda. The 2024 Move Illinois Plan can be found at [Long Range Transportation Plan \(illinois.gov\)](#) and the 2026 Next Move Illinois Plan can be found at [Next Move Illinois](#).

**Office of Highways Project Implementation** develops, maintains, and operates the state highway system in a timely, efficient, and economical manner. The central bureaus of the DOH develop policies, procedures, standards, and guidelines to accomplish the Department's highway system improvement objectives. The central bureaus monitor district programs to ensure statewide uniformity of policy interpretation and compliance and to ensure program coordination with Federal, state, and local agencies.

**Office of Intermodal Project Implementation (OIPI)** provides technical assistance and administers state and Federal funding to public transit systems throughout the state, including the three bus and rail transit systems under the Regional Transportation Authority in northeastern Illinois. The funding administered by the Department provides both capital and operating grants. In addition, OIPI assists non-profit agencies throughout the state in purchasing special transit vehicles and equipment to serve the elderly and individuals with disabilities.

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**Organizational Structure  
Bureau of Civil Rights**

See Attachment S for the Bureau of Civil Rights Organizational Chart.

**Title VI Staff**

**Title VI Coordinator**

The Title VI Coordinator is accountable for monitoring and documenting IDOT's Title VI program to ensure full compliance with all provisions of Title VI of the Civil Rights Act of 1964, all applicable Executive Orders, state and Federal laws, rules, and regulations.

The Title VI Coordinator is responsible for ensuring all Civil Rights complaints are expeditiously and correctly processed in accordance with the Department's Title VI complaint procedures.

The Title VI Coordinator is responsible for reviewing all Departmental policies, procedures, and practices to ensure adherence to Title VI directives.

The Title VI Coordinator ensures that the Department's updated Title VI Plan includes accomplishments for the past year and action items for the upcoming year and is created in a format prescribed by the Federal Highway Administration, the Urban Mass Transit Act, and the Illinois Department of Transportation.

The Title VI Coordinator provides Civil Rights advice, counseling, and training to Department management and employees so that all levels of employees are informed of their rights and obligations under the Civil Rights Act of 1964, as amended.

The Title VI Coordinator serves as the department's Language Access Coordinator and monitors compliance with the department's Language Access Plan. The Title VI Coordinator supervises the Title VI Specialist who assists with these duties.

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### **Title VI Specialist**

The Title VI Specialist position is accountable for coordinating, monitoring, and maintaining the Department's compliance program for Title VI of the Civil Rights Act of 1964. This position further assists the Title VI Coordinator in implementing and monitoring the Department's other Civil Rights programs as they relate to Title VII of the Civil Rights Act of 1964.

The Title VI Specialist assists the Title VI Coordinator in the monitoring and preparing of reports in the Title VI Program as they relate to the FHWA, FMCSA, and FTA. The Title VI Specialist ensures that Title VI reports to federal agencies are completed and transmitted in a timely fashion. The Title VI Specialist is assigned specific district offices and provides technical assistance, counsel, and guidance in the dispatch of all Civil Rights matters.

### **Other Civil Rights Staff**

**Civil Rights Analyst/Specialists** are accountable for planning, developing, implementing, and monitoring the Department's Affirmative Action Program. This includes data collection and analysis, selection process, complaint investigation, promotion, recruitment, and training.

### **Organizational Structure**

#### **Office of Business and Workforce Diversity and Bureau of Small Business Enterprises**

The Office and Business and Workforce Diversity (OBWD) has been assigned the responsibility for developing and implementing all aspects of the Disadvantaged Business Enterprise (DBE) program, and ensuring IDOT is in compliance with all provisions of 49 CFR § 26. The Director of OBWD has direct and independent access to the Secretary of the Illinois Department of Transportation pertaining to DBE program matters. The Director of OBWD has a full-time staff who devote their time to IDOT's DBE program.

IDOT's Bureau of Small Business Enterprises (SBE) located within the Office of Business and Workforce Diversity (OBWD) administers the U.S. Department of Transportation's Disadvantaged Business Enterprise program mandated by Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21). SBE's Bureau Chief is responsible for developing and implementing all aspects of the DBE program, and ensuring IDOT is in compliance with 49 CFR § 26.

The OBWD's SBE is responsible for reviewing and approving construction DBE utilization plans for IDOT's Divisions of Highways, Aeronautics, and Public and Intermodal Transportation, track the final

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payments to contractors and approve the final DBE goal modifications. SBE creates recommendations on pre- and post-award goal modifications, monitors other contract modifications, and sanctions. SBE personnel conduct labor, On-The-Job (OJT), and Equal Employment Opportunity (EEO) contract compliance field reviews.

SBE provides guidance to contractors to ensure they are informed as to their requirements to be in compliance with Federal and state labor laws governing prevailing wages, and performs compliance monitoring of construction contractors' OJT training activities. SBE compiles external EEO statistical data for submission to Federal and state authorities and develops and communicates compliance initiatives within IDOT's Division of Highways, Aeronautics, and Public and Intermodal Transportation.

### **Construction-site and Contract Monitoring**

The OBWD's SBE monitors DBE performance for commercially useful function and reviews and approves DBE substitutions and final modifications. SBE provides assistance and guidance to DBEs, prime contractors, and IDOT field personnel regarding the DBE program.

OBWD's SBE Contract Compliance Section reviews and responds to complaints by conducting investigations as appropriate. The Contract Compliance Section is assisted by IDOT's nine district offices which have a Contract Compliance (EEO) Officer who reports to the district Regional Engineer and is responsible for matters related to the DBE program. The Department's representative on each project is the resident engineer. The resident engineer is responsible for monitoring and reporting irregularities, problems or concerns to the district office and/or to the Bureau of Small Business Enterprises.

IDOT employs full-time Contract Compliance (EEO) Officers to ensure IDOT's compliance with all applicable state and Federal laws and statutes, including Title VI, and to promote and develop an inclusive work environment within IDOT facilities and on the locations of IDOT construction projects.

Under IDOT's organizational structure, Contract Compliance Officers are responsible for ensuring that IDOT contractors are in compliance with the employment and labor requirements stipulated in their contracts through construction site inspections, and the inspection and review of the contractor's payroll documentation.

The Contract Compliance Officer work with both prime and sub-contractors to keep the contractors informed of business opportunities available through IDOT. The Contract Compliance Officer communicates with contractors to establish the DBE goals for contracts based on the available percentage of certified DBE contractors within an IDOT district that are available, willing, able to perform the services for a specific pay item.

The Contract Compliance Officer receives training at the state and Federal level pertaining to Equal Employment Opportunity (EEO), diversity in the workplace, and other available training programs available from the State of Illinois and the U.S. Department of Transportation.

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**Contract Assurances**

The Department ensures that the following clause is placed in every U.S. Department of Transportation assisted contract and sub-contract:

“The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR § 26 in the award and administration of the USDOT assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such remedy as the recipient deems appropriate.”

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## **Organizational Responsibilities Contract Compliance Officers Responsibilities**

IDOT employs Contract Compliance Officers to ensure that contractors on Federally-aided highway construction projects are meeting their contractual obligations as subrecipients of funds received from the U.S. Department of Transportation through the Federal Highway Administration. IDOT employs nine Contract Compliance Officers (Equal Employment Opportunity Officers), with one Contract Compliance Officer located in each IDOT district office. The Contract Compliance Officers report to the Regional Construction Engineer located within their district office. All nine Contract Compliance Officers are full-time IDOT employees and dedicate all their job duties to completing the task and responsibilities required of Contract Compliance Officers by IDOT. IDOT's Disadvantaged Business Enterprise (DBE) Contract goals for construction projects are established within the IDOT district office. Contractor compliance is monitored by the Contract Compliance Officer, and by employees located within IDOT's Office of Business and Workforce Diversity. Both the Contract Compliance Officers and the members of the Office of Business and Workforce Diversity conduct onsite inspections of construction sites, and review contractors' payroll data. The staff of Contract Compliance Officers varies by the IDOT district, title, and the current number of vacancies.

### **Contract Compliance Officer Responsibilities:**

1. Monitors conformance to existing EEO and Labor Compliance Policies and conducts reviews and studies. Provides interpretation and analysis of policies which are of a sensitive and confidential nature.
2. Recommends courses of action and programs to the Regional Construction Engineer regarding Labor and EEO compliance provisions.
3. Supervises and performs contract EEO/Labor Compliance and On-The-Job Trainee records inspection of contractors performing work for IDOT.
4. Coordinates and monitors the Disadvantaged Business Enterprise (DBE) Program.
5. Recommends DBE goals on projects for each letting.
6. Recommends set-aside projects for letting.
7. Establishes and maintains continuous status of percentages of district goals, and ensures they are met.
8. Makes recommendations regarding "pre" and "post" award waivers on construction contracts and contractors.
9. Supervises and conducts inspections relative to contract compliance reviews and complaints. Ensures the compilation of current and accurate EEO statistical data for submission to Federal and state authorities.

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10. Informs the contractor of their EEO/Title VI obligation and reporting requirements prior to the beginning of a construction project.
11. Attends EEO and Title VI training hosted by Federal and state entities on an annual basis.

### **Office of Planning and Programming**

In cooperation with Federal, state, regional and local agencies and other public stakeholders, the Office of Planning and Programming (OP&P) develops and maintains a continuing, comprehensive, and multi-modal (highway, public transportation, rail and airport) planning and programming process to foster safe, efficient and economical transportation services. IDOT is committed to providing all residents of Illinois a transportation system that serves the needs of residents without regard to race, color, national origin, or income level. IDOT recognized that the transportation planning process needs to be cognizant and informed of the needs of minorities, low-income individuals, and populations with Limited English Proficiency.

The Office of Planning and Programming utilizes an evaluation criterion to examine and measure the distribution, benefits, and burdens of transportation investments included in the Multi-Year Plan, the Long Range Transportation Plan, and the Statewide Transportation Improvement Program. Statistical data is collected and maintained to verify transportation improvement projects and the level and quality of transportation services are being planned and programmed without regard to race, color, or national origin. Demographic information is utilized in each urbanized area.

In metropolitan areas, transportation planning is a collaborative process led by the Metropolitan Planning Organizations (MPOs) and other key stakeholders in the regional transportation system. The responsibility for transportation planning lies with designated MPOs. The process is designed to foster involvement by all interested parties, such as the business community, community groups, environmental organizations, and the general public, through a proactive public participation process conducted by the MPO in coordination with IDOT and transit operators.

The process promotes consistency between transportation improvements and state and local planned growth and economic development patterns. All Federally-funded projects and all regionally significant projects must be included in each metropolitan area's TIP. By law, this planning process must include an identified public involvement process. Public involvement meetings during the transportation planning process should include not only representatives from IDOT, public transportation operators, special interest groups, and local transportation agencies, but also, local land-use partners, Federal, state, and local environmental, regulatory and resource agencies, community representatives, and modal transportation providers.

An MPO's participation plan should identify required stakeholder involvement, as well as next steps for additional involvement needed to support the transportation planning process including the development of the MPO's TIP. This participation plan must provide reasonable opportunities for all parties to comment.

The State Transportation Improvement Program (STIP) is a federally mandated program of highway and transit projects that is developed from the MPO, Transportation Improvement Programs (TIP), and the IDOT highway and public transportation improvement programs. The STIP is a four-year program. The

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Draft STIP is published for public review and comment after the Illinois General Assembly approves IDOT's operating budget for the year.

All projects identified in the TIPs developed by the MPOs in the urbanized areas in Illinois are submitted to IDOT's Central Office for evaluation and consideration for inclusion into the STIP. Each of the MPOs has a federally required and accepted public involvement process that they utilize for the development of their TIPs.

Pursuant to Federal law, the STIP is developed in consultation with affected local officials with responsibility for transportation in non-metropolitan areas. The law establishes a list of "interested parties" who are to be provided with the opportunity to participate in the statewide planning process. For all of the non-metropolitan areas of the state, the STIP identifies projects contained in IDOT's current annual and multi-year highway improvement programs, as well as the five year public transportation improvement program.

The STIP is published in draft form and is announced through a press release to media outlets. Notifications are sent to all of Illinois' County Board Chairpersons inviting public review and comment of the Draft STIP. Advertisements are placed in approximately newspapers throughout the state notifying the general public of the availability of the Draft STIP for review and comment. Included within the Draft STIP are enclosed comment forms and a list of numbers to contact to deliver input on the Draft STIP.

IDOT's District 1 is the most densely populated of all IDOT districts and has the most ethnically diverse population. As a result, more publications are utilized within the District, including the most widely read minority publications. The Draft STIP is available for viewing on IDOT's website for the thirty-day public review and comment period.

The role of the Bureau of Statewide Program Planning regarding stakeholder involvement for the Draft STIP is to respond to public comments, and to modify the Draft STIP as necessary. Communications are sent through Regional engineers to document public comments and responses to comments.

When the thirty (30) day comment period is closed, the final version is sent to the Federal Highway Administration incorporating modifications from public comments and IDOT's internal review. The approved STIP is available on IDOT's website.

The Long-Range Transportation Plan is developed periodically by the Department to define long range policies, needs, and goals for transportation in Illinois. The Long-Range Transportation Plan is developed with extensive stakeholder involvement pursuant to Federal planning regulations codified in 23 CFR 450. These regulations require the Long-Range Transportation Plan be developed in consultation with state, tribal, and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation. The law establishes a list of "interested parties" who are to be provided with the opportunity to participate in the statewide planning process.

Publication of the Multi-Year Plan (MYP) serves as a starting point for input, commentary, and discussions with the General Assembly, the public, and other interested parties regarding the annual highway program budget appropriation, as well as transportation issues in Illinois. Stakeholder involvement with respect to the MYP is continuous and ongoing. Each successive MYP is built on the

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previous program published the prior year, and includes review and modification of funded projects, analysis of need and available funding, priorities for addition, priorities for addition of new projects, and the effects of stakeholder involvement from previous MYP.

### **Bureau of Land Acquisition**

The Bureau of Land Acquisition is responsible for developing policies for the statewide land acquisition program. This program includes the functions of appraisal, negotiation, acquisition, relocation assistance, property management, right-of-way engineering, and signboard and junkyard control. The Bureau is responsible for developing and administering standards of review for operational performance and for reviewing all right-of-way expenditures.

IDOT ensures that property rights for construction of transportation projects are in accordance with Title VI of the Civil Rights Act of 1964, the Federal Uniform Relocation Assistance and Real Property Act. These laws require that people affected by transportation projects are treated fairly and equitably. These activities require ongoing interaction with the public during all phases of the project, particularly in the following areas:

- Appraisals
- Property Management
- Acquisitions
- Condemnations
- Relocation Assistance Programs

IDOT's Land Acquisition Policies and Procedures Manual (Land Acquisition Manual) assists IDOT in ensuring that all real property is acquired in a standard and uniform process that treats all property owners in an equitable and nonbiased manner. Furthermore, the Land Acquisition Manual ensures IDOT's compliance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 CFR 24) and Title VI of the Civil Rights Act of 1964.

The procedures and standards for land acquisition (Right of Way) for highway programs are standardized through its Land Acquisition Manual. IDOT's Land Acquisition Manual was created in collaboration with all IDOT Districts, IDOT's Central Bureau of Land Acquisition (CBLA), and with approval from FHWA.

Prerequisites for programming of any right of way work (preliminary activities, advance acquisition, right of way acquisition, and relocation assistance) include the following:

1. The project is part of the approved Proposed Improvement Program. If not shown in the Proposed Improvement Book, a program addition is processed.
2. The project is shown on the State Transportation Improvement Program (STIP).

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3. The project development and route selection meet with the approval of the local public agencies involved.

FHWA must authorize projects with Federal dollars in the right of way activities prior to any negotiation work beginning. For preliminary right of way work, FHWA authorization may be requested only after “corridor approval” on new corridor project or after public involvement has occurred.

Preliminary right of way activity consists of title work, preparation of plans, plats and legal descriptions, relocation studies, and appraisal work. The initiative to obtain authorization for preliminary right of way work begins in the IDOT District by notifying IDOT’s CBLA of the need for preliminary right of way authorization. CBLA secures FHWA authorization to proceed with preliminary right of activities in conjunction with the project agreement that is submitted electronically to FHWA. After design approval is obtained, FHWA authorization is requested before any negotiation activities are initiated.

Appraisers, negotiators, and relocation agents must have the necessary background, experience, and ability to demonstrate good judgment in the area of eminent domain acquisition and relocation. All realty specialists must be qualified staff or on the approved fee list, which is approved and maintained by the CBLA.

Land Acquisition Policies and Procedures Manual Chapter 4.1.13 entitled Negotiator’s Report states:

Negotiators maintain in the parcel file a current written record including, but not limited to, the pertinent points of each discussion or contact with the property owner, the date(s) and place(s) of such contact, offers made, the owners’ reaction thereto, and the signature or initials of the negotiator following each entry on the record. Use the Negotiator’s Report (LA 4110) for this purpose. All entries to the Negotiator’s Report are required to be made within 24 hours of the initial contact. This report is considered part of the project parcel file at initiation. This report is beneficial to the negotiator and others within the Department and the FHWA in reviewing the history of the negotiation and in the analysis of negotiation procedures.

To assist in monitoring right of way activities to ensure compliance with Title VI of the Civil Rights Act of 1964, the negotiator should note the classification in the Title VI (Non-discrimination) block in the Negotiator’s Report. S/he should also indicate in the proper blank, the gender of the first-named owner of record shown on the Title Commitment or other evidence of ownership (M-Male, F-Female). In case of a trust, corporation, or business entity where no individuals are named, no entry is required.

Land Acquisition Policies and Procedures Manual Chapter 5 entitled Relocation Assistance and Payments Program states:

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The purpose of the relocation assistance and payments program is to provide for the relocation and reestablishment of persons, businesses, farm operations, and non-profit organizations displaced as a result of the acquisition of right of way for state highway construction projects. It establishes a means of providing relocation assistance and moving cost payments, replacement housing assistance payments, and other related expense payments in order that such displaced persons or businesses are treated fairly, consistently and equitably and do not suffer disproportionate injuries as a result of programs.... It is also designed to promote public confidence in the Department's land acquisition program, as well as to assure compliance with Federal requirements in order to assure Federal participation on Federally-assisted projects.

The provisions of the relocation assistance and payments program and these policies and procedures apply to the relocation of any displaced person for all state highway construction projects and Federally-aided local public agency highway projects. Any person who qualifies as a displaced person must be fully informed of their rights and entitlements to relocation assistance and payments provided by the Uniform Act and these provisions...

Land Acquisition Policies and Procedures Manual chapter 5.1.1 entitled Compliance with State and Federal Fair Housing Laws (Civil Rights) states:

To implement established state and Federal laws regulating the sale or rental of housing affirmatively, the regional engineer will:

1. Assist displaced persons as required and to the extent possible, in ensuring against discriminatory practices in the sale or rental of housing.
2. Inform displaced persons fully of their fair housing rights and options in selecting replacement housing in areas of their choice and the assistance available from the state in ensuring displaced persons that their fair housing rights will be protected in accordance with Title VIII of the Civil Rights Act of 1968 and the HUD Amendment Act of 1974.
3. Provide copies of state and Federal publications dealing with fair housing.
4. Advise the displaced persons of the name and address of the state agency responsible for receiving and processing housing discrimination complaints.
5. Develop housing resources using only "open housing", *i.e.*, available to all without discrimination on the basis of race, color, religion, and sex or national origin.

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The procedures outlined and required in IDOT's Land Acquisition Policies and Procedures manual ensures that IDOT's acquisition of real property is conducted in a manner that treats all real property owners in fair and equitable manner, and that non disparate impact arises due to a class or status protected by state or Federal law.

IDOT will continue to ensure that its acquisition of real property is conducted in a manner which is in compliance with the letter and spirit of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended.

**The Land Acquisition Program Title VI Work Plan:**

1. Ensure equal opportunity in all aspects of procuring real estate service contracting and appraisal agreements. Follow adopted IDOT vendor procurement policies in the acquisition of contracted services.
2. Maintain data on awards to minority and female appraisers and provide data to the Title VI Coordinator on a quarterly basis.
3. Follow guidelines for property acquisition as well as applicable laws and regulations including Title VI.
4. Adhere to Departmental policy of apprising affected property owners, tenants and others involved in right-of-way acquisition of their rights and options regarding negation, relocation, condemnation and other aspects of the acquisition process.
5. Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate clauses, including Title VI assurances.
6. Ensure that appraised values and communications associated with the appraisal and negation operations result in equitable treatment.
7. Ensure comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.
8. Maintain statistical data funded projects and provide detailed demographic data quarterly to the Title VI Coordinator.

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**Title VI Data Collection**

Offices that encounter the public are responsible for collecting data on race, color, national origin, and language spoken other than English as it pertains to their interactions with the public. To standardize data for year-to-year comparisons, each program will use the following benchmarks in its data collection:

- Number of Title VI Complaints filed with IDOT
- Number of completed investigations with findings
- Number of planned and completed IDOT reviews
- Number of current subrecipients who have submitted needed documentation
- Number of planned and completed training sessions
- Percentage of population that does not speak English proficiently
- Number of languages other than English used by the population
- Number of translation services provided
- Number of interpreter services provided
- Cost of translation and interpreter services provided
- Percentage of population living in poverty
- Percentage of population age 65 and older
- Percentage of population that identified as minority

Whenever possible, the data will be disaggregated to the district and census tract level to ensure that Title VI compliance occurs across all IDOT districts and not just statewide. Established sources of data and analysis tools used include:

- U.S. Census Data
- EJ Screen
- School district information
- Direct surveys
- Land use plans
- Geographic Information Systems
- MPO transportation models

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### **LEP Data Collection**

IDOT offices and bureaus regularly capture data elements or sets when implementing and/or maintaining activities, encounters, events, programs, projects, or services provided by IDOT.

Data collection includes, at a minimum:

- Primary non-English language of the population in the project impact or service area(s).
- Primary non-English language of customers served (e.g. number of drivers affected).
- Number of LEP individuals, by language group, who requested or received spoken language services.

### **Data Analysis**

Each office and bureau is responsible for analyzing the data annually to identify and address any trends or patterns of discrimination or potential for discrimination. Each program area is also responsible for analyzing the data collected and recommending corrective action as appropriate to BCR. Types of analysis to address compliance with Title VI include:

- Distribution of benefits (dollars, facilities, systems, projects) by groups and communities;
- Allocation of funds by mode (highway, bus, etc.);
- Impact of investments on income, race, color, national origin, sex, age and disability groups;
- Persons included in the decision-making process;
- Projected population increases versus planned facilities and type of facilities;
- Impacts of the location of existing or proposed facilities connected with a project;

### **IDOT District Offices**

The District offices have oversight responsibilities to ensure that all of their special emphasis program areas comply with Title VI requirements within the District. They coordinate efforts with BCR's Bureau Chief, Title VI Coordinator, and Title VI Specialists to ensure Title VI compliance. The district offices provide data, statistics, and information regarding Title VI compliance to their respective District offices for inclusion in IDOT's various Title VI monitoring, compliance, and reporting activities.

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**Bureau of Design and Environment**

The Bureau of Design and Environment (BDE), located in IDOT's Division of Highways is responsible for developing standards, specifications, and policies for the State highway system to provide an economical, safe, and comfortable movement of people and goods within the State. BDE develops highway standards and provides support services for district highway design programs; coordinates and prepares Federal-aid program documents; and processes plans and contract documents through the letting and contract award stage. In addition, BDE is responsible for developing policies for the preparation, coordination, final review, and approval of project location studies and environmental documents.

The Chicago Region Environmental and Transportation Efficiency (CREATE) Program will invest billions in critically needed capital improvements to increase the efficiency of the region's railroad infrastructure. The CREATE Program will reduce train and automotive delays through the Chicagoland area by focusing railroad traffic on rail corridors that will be improved to handle passenger and freight traffic more efficiently.

The CREATE Program is a groundbreaking partnership between the State of Illinois, the City of Chicago, Metra, Amtrak, the Association of American Railroads, and the U.S. Department of Transportation. A Project of regional and significance, CREATE includes 70 critically needed rail and highway infrastructure improvements in Northeast Illinois. CREATE is already improving the quality of life for Illinois residents, and increasing the efficiency of freight and passenger rail service throughout the region.

With the way train tracks currently intersect with each other and with roads, and because the regional freight railroads defer to Amtrak and Metra in track utilization, it can take up to thirty hours for freight trains to pass through the Chicago region. Delays in rail freight threaten the economic vitality of the region, lead to increased traffic congestion on roadways, generate unnecessary levels of air pollution, raise safety concerns, affect adversely the reliability and speed of rail passenger service, and make it harder for farmers to make a profit.

At-grade rail crossings, communities are negatively impacted by chronic traffic delays on roadways. With funding from the State of Illinois, the City of Chicago, and the U.S. Department of Transportation, Metra, Amtrak, and the nation's major freight railroads, CREATE has begun to alleviate these problems. With IDOT adhering to the practice and principles of Context Sensitive Solutions, IDOT is able to engage stakeholders (residents, real property owners, business owners, environmental groups, etc.) during the planning stages to inform stakeholders of the purpose of projects, receive feedback from the community of CREATE plans, and to plan mitigation needs of a CREATE project.

The traditional methods to handle the environmental analysis for the component projects would be on a project-by-project basis, or with a Tiered or Programmatic Environmental Impact Statement (EIS) for the CREATE Program as a whole. The project-by-project method could be vulnerable to legal challenges that would cause unnecessary delays in construction. The Tiered EIS approach would be cumbersome to low-risk projects. Taking these factors into consideration, IDOT, the Chicago Department of Transportation, and the Federal Highway Administration (FHWA) Illinois Division Office developed the Systematic, project Expediting, Environmental Decision-making (SPEED) Strategy. (For more detail, please refer to the SPEED Strategy Flow Chart in Appendix D.)

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The SPEED Strategy is a comprehensive method of evaluation that supports systematic decision-making allowing low risk component projects to move forward. It evaluates potential environmental impacts in a proportionally graduated manner. The SPEED Strategy provides a methodical project screening and decision making, and proportionally assesses impacts while still enabling rapid start-up of the low risk projects, and limiting risk of delays from legal challenges based on segmentation issues.

The SPEED Strategy began with the development of the CREATE program Feasibility Plan.

The CREATE Program-Feasibility Plan is a compilation of existing documents and includes:

1. Program Level Goals and Strategies;
2. the Joint Statement of Understanding;
3. the Component Project Chronology and Selection Rationale;
4. List of Component Projects;
5. Public Outreach Summary;
6. Public Involvement Summary for this document;
7. Description of the National Public Benefits as a result of CREATE; and
8. Description of the Local and Regional Public Benefits as a result of CREATE;

The second step in the SPEED Strategy was the CREATE Program – Component Project Preliminary Screening. This step established each project through:

- identifying its objective/intent;
- providing a work description; and
- providing projects limits.

Each component project is subjected to three tests during this screening, logical termini, independent utility, and restriction of alternatives. The outputs of this stage are:

- the identification of linked projects,
- Preliminary purpose of Need for all stand-alone component projects and linked projects.

All stand-alone component projects identified in the screening step (step two) were processed through an initial Environmental Class of Action Determination (ECAD). The FHWA Illinois Division and IDOT cooperatively developed the ECAD process. The ECAD process evaluates and documents the anticipated impacts of component projects. It also assisted FHWA to select what environmental class of action the component project should be processed as (categorical exclusion (CE), Environmental Assessment (EA), or EIS).

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During the required public involvement process per the National Environmental Policy Act, if a component project includes an alternative that results in road closures, those alternatives, as well as possible mitigation measures, will be presented for public review and comment.

The final decision to implement those closures will be made based on this public input. If FHWA determines the project is classified as CE, the project can then proceed to authorization for detailed design and construction. If FHWA determines the project should be elevated to an EA, an EA would need to be completed to determine if any significant impacts are involved in the implementation of the project. If the EA does not identify any significant impacts, the FHWA issues a Finding of No Significant Impacts (FONSI). The project can proceed to authorization for detailed design and construction.

If the EA identifies significant impacts as a result of implementing a project, an EIS is required. After the FHWA completes and approves the Draft and Final EIS, it will issue a Record of Decision (ROD). If a build alternative is selected in the ROD, the project can then proceed to authorization for detailed design and construction.

## **CREATE**

IDOT was able to identify the presence of minority, female, elderly and low-income populations within the impacted area by using data from the U.S. Census Bureau; interviewing local planning and transportation engineering staff; and coordinating with elected officials.

Using the same data, IDOT determined that it did not have to translate materials into other languages for the CREATE project. All advertisements and outreach material included the following information:

This meeting will be accessible to persons with disabilities. Anyone needing special assistance should contact (Name) at (Phone Number). Persons planning to attend who will need a sign language interpreter or other similar accommodations should notify the TTY.TTD number (800) 526-0844/ or 711; TTY users (Spanish) (800) 501-0864 or 711; and for Telebraille dial (877) 526-6670 at least five days prior to the meeting.

A targeted public involvement program was implemented for the CREATE Project to ensure that stakeholders had meaningful opportunities to participate in the project development process. The targeted public involvement program ensured compliance with the National Environmental Policy Act (NEPA), related laws, and regulations. It also ensured compliance with Federal and state laws requiring the implementation and deployment of Context Sensitive Solutions (CSS).

The Context Sensitive Solutions process is designed to ensure that transportation solutions are developed to respond to and to reflect the values and concerns of the neighborhoods and communities impacted by a transportation project. This is accomplished through providing a contextual audit, obtaining concurrence on the Problem Statement, providing a range of alternatives to be studied, and obtaining the preferred alternative. IDOT's implementation of CSS allows for transportation investments to be planned with the needs of transportation users in advance, taking into account the need purpose and benefits of a transportation investment, mitigation needs, and clear and constant communication to affected residents. The CSS process has reduced the need for mitigation measures after construction has begun.

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### **Bureau of Design and Environment Title VI Work Plan**

The Bureau of Design and Environment will continue to coordinate with the Offices, Divisions, and teams within IDOT to ensure that the public has meaningful access and input in the transportation decision-making process.

The Bureau of Design and Environment will continue to identify areas projects that will have an impact on minority and low-income populations. When applicable, BDE will identify areas where Limited English Proficient (LEP) populations reside ensuring that LEP populations have proper notice, and access to meaning access and involvement in the transportation decision-making process.

The Bureau of Design and Environment will work with internal resources to ensure all notices and advertisements use politically correct and sensitive language.

### Procurement

IDOT has many opportunities for private business to do business with IDOT. IDOT uses private firms for professional services and construction to obtain specialized skills and to be an economic generator within the state. For engineering, architectural, land surveying, and professional services, IDOT has a prequalification process that evaluates firms based on their professional experience and qualifications. Prequalified firms are required to submit updated statements of experience and financial condition annually.

IDOT advertises for professional services four times a year via the Professional Transportation Bulletin (PTB), and makes this schedule public via the PTB schedule. The PTB contains information pertaining to the advertisements for offering of interest for professional engineering, land surveying, and architectural services for IDOT projects. Firms selected to complete IDOT projects are Quality Based, and adhere to the requirements of 30 ILCS 535/1.

If IDOT does not have the specialized expertise, IDOT utilizes an outside contractor. Any firm interested in bidding on IDOT highway construction contracts as a prime contractor must be prequalified. The prequalification process is governed by Title 44 of the Illinois Administrative Code Section 650.

Prequalification grants a firm permission to bid on construction contracts, local agency projects, and a prequalified prime contractor is automatically classified as a “registered subcontractor. To become prequalified; firms must understand the Rules for Prequalification, determine categories for prequalification.

IDOT prequalifies firms in 42 prequalification categories ranging from highway structures to hydraulic dredging, and submit an application. Each prospective bidder must furnish evidence to IDOT that it has complied with the Illinois Department of Human Rights’ Rules and Regulations, Section 8.1 prior to being issued a bidding proposal. Firms are informed on contracting opportunities through Transportation Bulletins and Contractor’s Bulletins.

To ensure that quality materials are used in highway projects, IDOT maintains a system of sampling, testing, documentation, and reporting of test results. Producers and/or suppliers interested in providing materials to be used in IDOT construction projects must register with IDOT. Specific products can only be tested by IDOT or an IDOT approved laboratory.

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## **Title VI Program Complaint Procedures**

### Who can file?

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination prohibited by Title VI of Civil Rights Act of 1964 and related Nondiscrimination authorities may file a complaint. (A copy of the form can be found in Appendix E.)

Complaints must be filed within one hundred eighty (180) days of the date of the alleged act of discrimination or, where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Complaints must be filed in writing. If the complaint is verbal, a representative of the Bureau of Civil Rights (BCR) will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature.

### What must you include in the complaint?

The complainant must include the following information in the complaint:

1. Name, address, and telephone number of the complainant or representative.
2. The name, address, and telephone number of the attorney or authorized representative if you are being represented.
3. Name(s), address(es) and title(s) of alleged discriminating officials or entity.
4. Basis of your complaint, the motivating factor for the discrimination (*i.e.*, race, color, national origin, or sex).
5. Date on which alleged discriminatory act(s) or event(s) occurred. Please note that we cannot accept a complaint about an incident that took place more than one hundred eighty (180) days prior to the filing of the complaint. If the discrimination occurred more than one hundred eighty (180) days prior to filing your complaint, you may request a waiver of the filing requirement.
6. The complaint must describe the facts and circumstances surrounding the claimed discrimination.
7. The nature of the incident that led the complainant to feel discrimination was a factor.
8. Names, addresses, and telephone numbers of witnesses or persons that have direct knowledge of the incident.
9. Date the complaint was received by Bureau of Civil Rights (BCR).
10. List other agencies (state, local or Federal) with which the complaint has been filed.

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11. Complainant's signature and/or complainant's representative and date.

At the complainant's request, the BCR will provide language or sign interpreter assistance. The complaint may be sent or faxed to the following address or telephone number:

Title VI Coordinator  
Bureau of Civil Rights  
2300 South Dirksen Highway, Room 317  
Springfield, Illinois 26764  
Telephone: 217-782-2762  
Fax: 217-524-4063

You can download a copy of the Title VI Complaint form at: <https://idot.illinois.gov/about-idot/civil-rights/equal-rights/title-vi.html>

Or you can obtain a copy of the Title VI Complaint form by calling the number above.

Complainants have the right to complain directly to the appropriate Federal agency; however, they must do so within one hundred eighty (180) calendar days of the last alleged incident.

A complainant may file a Title VI Complaint with the U.S. Department of Transportation by contacting DOT at:

Federal Highway Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
1200 New Jersey Ave, SE  
Washington, DC 20590

Complaint Processing

Highway-related Title VI complaints will be routed to the Federal Highway Administration (FHWA) Office of Civil Rights for processing. FHWA is responsible for all complaint determinations regarding whether to accept, dismiss, or transfer Title VI complaints filed against state departments of transportation or their subrecipients. (See, [\*Federal Highway Administration Office of Civil Rights Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964.\*](#))

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### **Subrecipient Monitoring Procedures**

IDOT is responsible for developing and implementing an effective external monitoring program.

In accordance with 23 CFR, 200.9(b)(7), BCR conducts reviews of Local Public Agencies (LPAs), , planning agencies, and other recipients of federal aid. IDOT provides technical assistance to subrecipients in the process of achieving program compliance and periodically verifies Title VI program criteria with onsite reviews and/or desk reviews. IDOT will conduct compliance reviews periodically of subrecipients. We will review select recipients of Federal-aid highway or other Federal funds to ensure that they are adhering to Title VI requirements. Subrecipients will be chosen based on a variety of factors including the amount of aid received, size, location, the racial composition of the population served by the subrecipient, etc. Conducting the review will confirm operational guidelines provided to consultants, contractors, and subrecipients, including Title VI language, provisions, and related requirements.

#### Onsite Compliance Review selection process

BCR will use a risk-based approach to identify a sample of LPAs receiving federal highway funds with the greatest potential to affect those groups covered by Title VI. Criteria for identifying LPAs for review may include the following:

- Complaints
- Population of agency
- Number of IDOT Funded Projects
- Number of Limited English Proficiency Populations
- Issues frequently identified as problems faced by program beneficiaries
- Issues raised in a complaint or identified during a complaint investigation;
- Problems identified by community organizations or advocacy groups that cite actual incidents to support their concerns;
- Problems identified by its subrecipients; and/or,
- Problems identified by other state, federal, or local civil rights agencies.

BCR works with the IDOT Offices & Bureaus to obtain a list of its current local government projects and ensures the review of a diverse group with varying funding amounts.

#### Notification

IDOT notifies LPAs in writing of an onsite compliance review at least 30 calendar days in advance. The notification letter will include an itemized listing that outlines the major Title VI elements requiring supporting documentation. The LPA shall submit supporting documentation to BCR-Title VI within 30 calendar days of the date of the notice.

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Findings

The Title VI Coordinator will review the documents and information submitted by the LPA. BCR will prepare a report of findings, including corrective actions, if applicable. The LPA will be given between 30

- 90 days to develop and submit to BCR a voluntary correction plan. After the LPA corrects all deficiencies, BCR will provide written notification if it is in compliance. When an LPA does not correct the deficiencies or fails to submit a corrective plan, it may be subject to sanctions including the suspension of federal funding. If there are no deficiencies, the report of findings may provide recommendations for strengthening the LPA's Title VI Program.

Follow-up Monitoring

BCR-Title VI will determine the need for additional monitoring to obtain a compliant status and ensure ongoing compliance with Title VI/Nondiscrimination requirements. BCR may conduct follow-up reviews to ensure the LPA has complied with the noted deficiencies.

Sanctions

In the event the Respondent fails or refuses to comply with the terms of this agreement, the Secretary may take any or all of the following sanctions:

- Cancel, terminate, or suspend the funding in whole or in part.
- Refrain from extending any further assistance to the Respondent under the program with respect to which the failure or refusal occurred until satisfactory assurance of future compliance has been received from the Respondent.
- Take such other action that may be deemed appropriate under the circumstances, until compliance or remedial action has been accomplished by the recipient.
- Refer the case to the US Department of Transportation for appropriate

legal proceedings. Reporting

Internal Title VI Reviews will be performed annually as a Title VI questionnaire. The annual questionnaire includes general questions regarding Title VI complaints, Title VI training, and questions specific to each program, such as:

- Describe the Office/Bureau's procedures for identifying and reporting external Title VI complaints of discrimination.
  - If none, describe the efforts to develop procedures.
- Does the Office/Bureau distribute Title VI information to the general public?
- Does the Office/Bureau contract out for services?

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- If so, please provide a copy of three different contracts.
- What efforts have been taken to overcome language barriers in all activities of the Office/Bureau based on data and analysis?
- What Title VI training has the Office/Bureau staff attended?

Once the Title VI Coordinator and Bureau Chief select the due date for the questionnaires and notice is provided to Bureau Chiefs and Office Directors, recipients of the questionnaire can reach out to Title VI staff if they have any questions and submit the completed questionnaires with supporting documentation.

#### Analysis

Once the Title VI data is collected, the data must be analyzed to identify patterns of discrimination or the potential for discrimination. Each office or bureau is responsible for analyzing the data collected and recommending corrective action, as appropriate to BCR. A pattern of discrimination may result from a specific process or as the result of a process or procedure being implemented in a discriminatory manner.

When determining compliance with Title VI, each office or bureau may consider the following:

- The way services are or will be provided & the related data necessary for determining whether any persons are/will be denied services on the basis of their protected class as defined by Title VI authorities;
- The population eligible to be served by race, color, and national origin;
- The location of existing or proposed facilities connected with the program, and related information adequate for determining whether the location has or will have the effect of unnecessarily denying access to any persons on the basis of prohibited discrimination;
- The present or proposed membership by race, color, and national origin, in any planning or advisory body that is an integral part of the program; and
- Where determination of location is involved, the requirements and steps used or proposed to guard against unnecessary impact on persons on the basis of race, color, and national origin.

Types of analysis to address compliance with Title VI include

- Percent of benefits allocated to persons below the poverty line versus persons above the poverty line;
- Distribution of benefits (dollars, facilities, systems, projects) by groups and communities;
- Allocation of funds by mode (highway, bus, etc.);
- Impact of investments on income, race, color, national origin, sex, age and disability groups;
- Projected population increases versus planned facilities and type of facilities;
- Impacts of the location of existing or proposed facilities connected with a project;
- Alternatives to modes, locations, and types of facilities;
- Language assistance needs assessment;
- Transportation needs of all persons within the boundaries of plans or projects;
- Persons included in the decision-making process;

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- Strategies to address impacts and develop mitigation;
- Priorities for investments;
- Sources for financing investments, and
- Strategies to disseminate information.

In accordance with 23 C.F.R. § 200.9 (b) (5), BCR Title VI staff will conduct two program area reviews on an annual basis. Criteria used in selecting the program area for review may include:

- Changes in program policies/procedures.
- Title VI complaints, concerns, or questions by internal or external parties.

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# **APPENDIX A**

## **FHWA Title VI Assurance and Appendix A**

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## **Title VI Assurance to the Federal Highway Administration**

### TITLE VI ASSURANCE to FEDERAL HIGHWAY ADMINISTRATION

The Illinois Department of Transportation (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

#### **Statutory/Regulatory Authorities**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

#### **General Assurances**

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

*"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973) by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

#### **Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Federal Aid Highway Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

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to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Illinois Department of Transportation, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."


3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

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- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the Illinois Department of Transportation also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Illinois Department of Transportation gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Aid Highway Program. This ASSURANCE is binding on Illinois, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Signed by:  
  
 03680F3666F64CB...

Gia Biagi, Secretary  
Illinois Department of Transportation

Dated 02/27/26 | 12:11 PM CST

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APPENDIX A TITLE VI ASSURANCE to FHWA

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
  - a. withholding payments to the contractor under the contract until the contractor complies; and/or
  - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor

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will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

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# **APPENDIX B**

## **FHWA Title VI Assurance Appendix B**

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APPENDIX B TITLE VI ASSURANCE to FHWA

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the State of Illinois will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the State of Illinois all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

**(HABENDUM CLAUSE)**

**TO HAVE AND TO HOLD** said lands and interests therein unto the State of Illinois and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the State of Illinois, its successors and assigns.

The State of Illinois, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]\* (2) that the State of Illinois will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

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# **APPENDIX C**

**FHWA Title VI Assurance Appendix C**

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APPENDIX C TITLE VI ASSURANCE to FHWA

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the State of Illinois pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
  - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, State of Illinois will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.\*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the State of Illinois will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the State of Illinois and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

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## **APPENDIX D**

FHWA Title VI Assurance Appendix D

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APPENDIX D TITLE VI ASSURANCE to FHWA

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the State of Illinois pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, the State of Illinois will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.\*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the State of Illinois will there upon revert to and vest in and become the absolute property of the State of Illinois and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

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# **APPENDIX E**

## **FHWA Title VI Assurance Appendix E**

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APPENDIX E TITLE VI ASSURANCE to FHWA

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

**Pertinent Non-Discrimination Authorities:**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. §4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with

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Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);

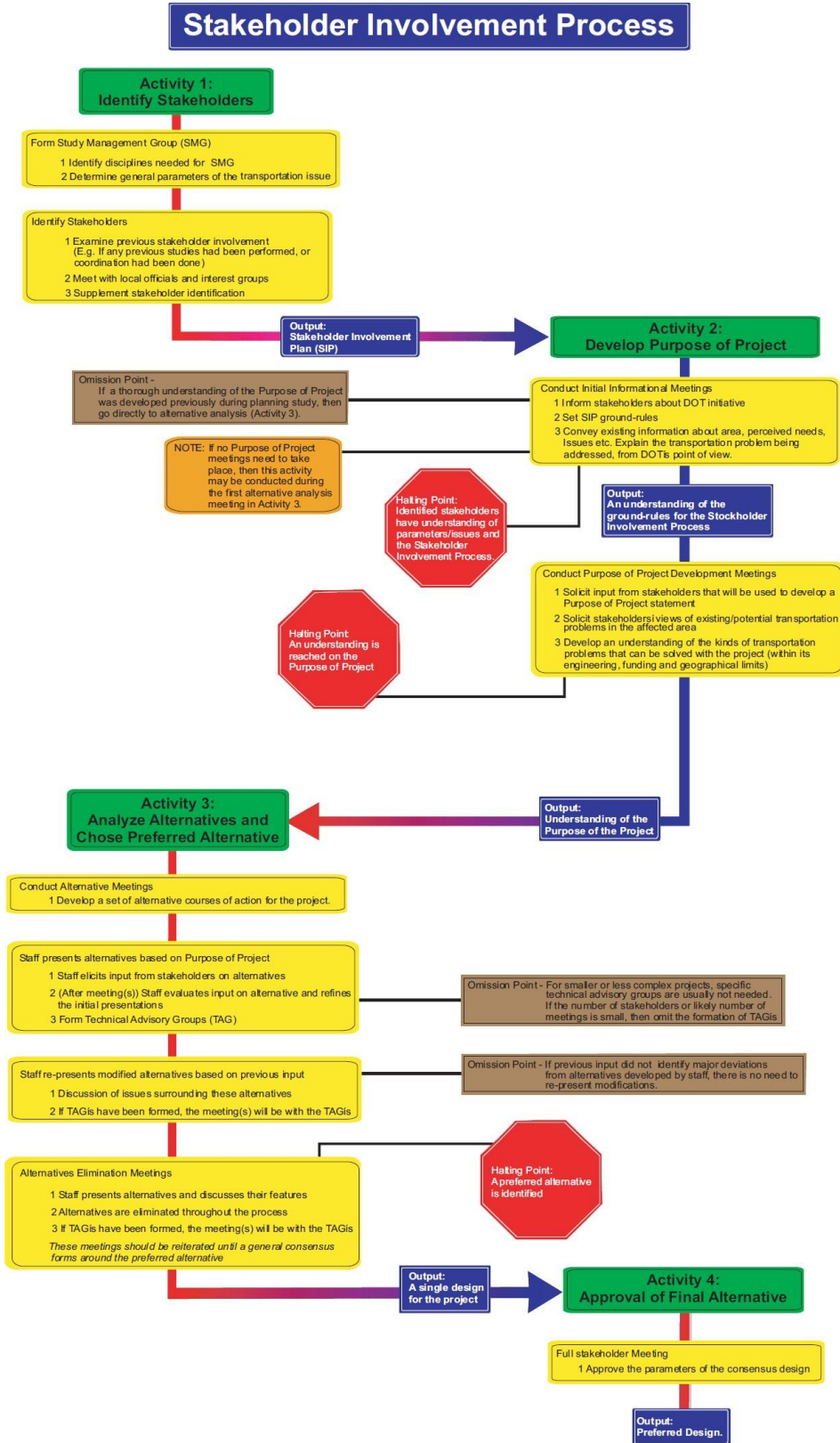
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. § 1681 *et seq.*)

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# **APPENDIX F**

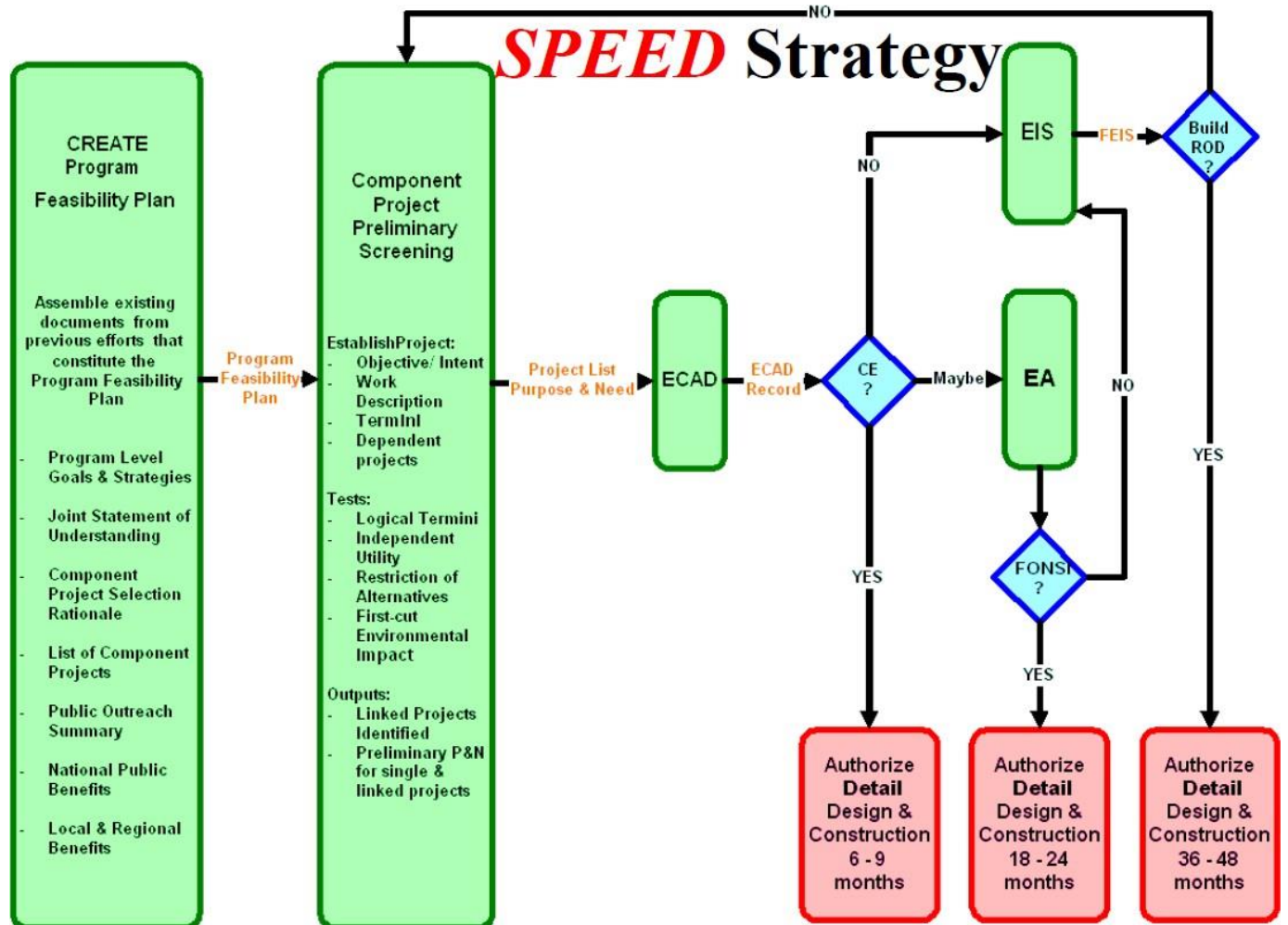
## **Context Sensitive Stakeholder Engagement Process**

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# APPENDIX G

## SPEED Strategy Process Chart



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**APPENDIX H**  
**IDOT Title VI Complaint Form**

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**Title VI Complaint  
(Environmental Justice and Related Authorities)**

To submit a Title VI Complaint to the Illinois Department of Transportation, please complete the following form, sign electronically, and click the Email button. You can attach any additional documentation you wish to submit to your complaint before sending. Alternatively, the form can be printed, completed manually, and returned to: Illinois Department of Transportation, Bureau of Civil Rights, 2300 South Dirksen Parkway, Room 317, Springfield, IL 62694 or scanned and emailed to: [dot.civilrights@illinois.gov](mailto:dot.civilrights@illinois.gov). **Electronic submission is preferred to ensure timely and confidential processing.**

If this complaint concerns disability discrimination, please complete the [ADA Accessibility Complaint Form](#).

For questions or a full copy of the Illinois Department of Transportation's Title VI policy and complaint procedures, please submit a written request to the above address, visit <http://www.idot.illinois.gov/home/Civil-Rights>, or email your request to [dot.civilrights@illinois.gov](mailto:dot.civilrights@illinois.gov), or call (217) 782-2762.

**SECTION I**

Name	E-mail Address	Preferred Contact Number	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Address	City	State	Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**SECTION II**

1. Are you filing this Complaint on your own behalf?  Yes (go to Section III)  No (go to #2)

2. If you answered "No" to question 1, please describe your relationship to the person (Complainant) for whom you are filing and why you are filing for a third party.

3. Have you obtained permission of the aggrieved party (Complainant) to file on their behalf?  Yes  No

**SECTION III**

1. Have you previously filed a Title VI Complaint with the Illinois Department of Transportation?  Yes  No

2. Have you filed this complaint with another federal, state, or local agencies or with any state or federal court?  Yes  No  
If "yes", please check all that apply and provide filing identification/contact information.

Federal Agency \_\_\_\_\_

Federal Court \_\_\_\_\_

State Agency \_\_\_\_\_

State Court \_\_\_\_\_

Local Agency \_\_\_\_\_

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## SECTION IV

1. Date of Incident

2. If applicable, name of person(s) who allegedly discriminated against you, if known.

Discrimination based on:

- Race
- Color
- National Origin/LEP
- Sex
- Age
- Religion

For disability related complaints, please use [ADA Accessibility Complaint Form](#).

3. Please provide a brief explanation of the incident(s) and how you feel you were discriminated against, including how you feel others may have been treated differently than you. (If you have additional written material pertaining to your complaint, please attach to the email when submitting this form.)

4. Why do you believe discrimination occurred?

5. What remedy are you requesting?

6. Please list any person(s) we may contact for additional information to support or clarify your complaint.

Name	Phone	Email
<input type="text"/>	<input type="text"/>	<input type="text"/>

## SECTION V

**Please Note: The Illinois Department of Transportation cannot accept your complaint without a signature.**

I affirm that I have read the above charge and it is true to the best of my knowledge.

Complainant Signature

Date

<input type="text"/>	<input type="text"/>
----------------------	----------------------

Name of person completing this form, if different than Complainant

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# **APPENDIX I**

## **Public Notice**

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**Public Notice**

**Notifying the Public of Rights under Title VI**

**Illinois Department of Transportation (IDOT)**

The Illinois Department of Transportation (IDOT) conducts its programs, activities, and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Illinois Department of Transportation.

For more information on the Illinois Department of Transportation's Civil Rights program, and the procedures to file a complaint, contact (217)782-2762, (TTY (866)-273-3681); email DOT.Complaint@Illinois.gov; or visit our administrative office at:

Illinois Department of Transportation (IDOT)  
Bureau of Civil Rights, 3<sup>rd</sup> Floor  
2300 South Dirksen Parkway  
Springfield, Illinois 62764-0001

For more information, visit [www.dot.il.gov](http://www.dot.il.gov).

A complaint may be filed directly with the Federal Highway Authority by contacting FHWA's Office of Civil Rights at:

The Federal Highway Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

If you need this information translated into another language, please contact Magdalena Sparovich at (217) 557-3383.

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# **APPENDIX J**

## **Title VI Subrecipients' Questionnaire**

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Title VI Subrecipients' Questionnaire

**As a recipient of Federal grant funding, the Illinois Department of Transportation (IDOT) is required to ensure that all subrecipients are in compliance with Title VI of the Civil Rights Act of 1964 ("Title VI"), rules, regulations, and Executive Orders, which govern Title VI on federally funded projects. To ensure that subrecipients of Federal Highway Administration funding are in compliance with these requirements, your organization must complete the following questionnaire in its entirety.**

If you have questions on how to complete this form, please contact: Illinois Department of Transportation, Bureau of Civil Rights, Room 317, 2300 S. Dirksen Parkway, Springfield, IL 62764 or call (217) 782-2762. Questionnaire may also be returned via email to: [Dot.civilrights@illinois.gov](mailto:Dot.civilrights@illinois.gov).

Applicant Name:	Project Name:	Date of Report:
-----------------	---------------	-----------------

**PART I: TITLE VI PLAN & COMPLAINT PROCEDURES**

1. Does your organization have a Title VI Program/Policy?  Yes  No

A. If yes, does your organization's Title VI Program include:

- (i) A Public Involvement/Public Engagement Process:  Yes  No
- (ii) A Limited English Proficiency Policy?  Yes  No
- (iii) A Language Assistance Plan?  Yes  No
- (iv) A Title VI Complaint Form?  Yes  No
- (v) A Title VI Complaint Procedure?  Yes  No
- (vi) A notice to the public of their ability to file a discrimination complaint against your Agency under Title VI?  Yes  No
- (vii) A public notice/or notices informing beneficiaries about services, activities, and programs?  Yes  No
- (viii) Are your notices to the public offered in languages that meet the criteria for "Safe Harbor" status?  Yes  No
- (ix) An Assurance(s) that your programs, services or facilities will be operated in a nondiscriminatory manner?  Yes  No

**If you answered "Yes" above, then you must submit a copy of your organization's Title VI Policy and Complaint Form. Please attach these documents to this questionnaire.**

**If "No", in the space provided below, please explain how your organization plans to meet Title VI requirements.**

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PART 2: NON-DISCRIMINATION POLICY & STATEMENT		
Does your organization have a non-discrimination policy that is incorporated into a Statement of Non-discrimination? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>		
If you answered "Yes" above, then you must submit a copy of your organization's non-discrimination policy statement of non-discrimination. Please attach these documents to this questionnaire.		
If "No", in the space provided below, please explain.		
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>		
PART 3: TITLE VI COORDINATOR/SPECIALIST		
Does your organization have a person employed who is responsible for handling civil rights issues and/or a Title VI Coordinator/Specialist? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>		
If "Yes," then please provide the following information about the Title VI Employee:		
Name:	Title:	Mailing Address:
Phone Number:	Fax Number:	E-mail Address:
Please be sure to attach the following documents to this questionnaire, as needed:		
<input type="checkbox"/> Title VI Plan		
<input type="checkbox"/> Title VI Complaint Form and Complaint Procedures		
<input type="checkbox"/> Non-discrimination Policy/Statement of Non-discrimination		
<input type="checkbox"/> LAP Plan and/or LEP Policy		
SIGNATURE OF AUTHORIZED REPRESENTATIVE		
By signing below, I certify that I am authorized to sign this questionnaire on behalf of my organization, and that the information contained in this report is accurate and complete to the best of my knowledge.		
Printed Name: _____	Printed Title: _____	
Signature: _____	Date: _____	

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## **APPENDIX K**

### **Subrecipients' Title VI Compliance Monitoring Checklist**

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Subrecipients' Title VI Compliance Monitoring Checklist

SUBRECIPIENTS TITLE VI COMPLIANCE MONITORING CHECKLIST		
Name of Subrecipient: _____		
<b>Checklist Items</b>		
1. Do you have Assurances that your programs or facilities will be operated in a non-discriminatory manner?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Do you have a Limited English Proficiency Policy?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Do you have a Language Assistance Plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. Do you have Title VI complaint procedures?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Do you have a Title VI complaint form?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6. Do you have a method to track complaints, investigations, and findings of discrimination?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7. Do you provide public notice pertaining to services, activities, and programs?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8. If you provide public notices, are your notices offered in languages that meet the criteria for "Safe Harbor" status?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
9. Do you provide notice to the public of their ability to file a discrimination complaint against your Agency under Title VI?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
10. Do you keep accurate and complete records necessary to ascertain whether you are complying with Title VI?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>** PLEASE provide examples of all applicable documents and attach comments to correspond with questions number, when applicable.</b>		
Person who submitted information for the checklist, please indicate by signing below. Your signature attests that the answers given above are true and accurate.		
Subrecipient's Representative: _____	Title: _____	Date: _____
IDOT Monitor: _____	Title: _____	Date: _____

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# **APPENDIX L**

## **MPO Questionnaire**

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Title VI Requirements in Metropolitan  
Planning Organizations Questionnaire

**I. OVERALL STRATEGIES AND GOALS**

1. What strategies and efforts has the planning process developed for ensuring, demonstrating, and substantiating compliance with Title VI?

2. What measures have been used to verify that the multi-modal system access and mobility performance improvements included in the plan and Transportation Improvement Program (TIP) or Statewide Transportation Improvement Program (STIP) and the underlying planning process, comply with Title VI?

Yes     No    3. Has the planning process developed a demographic profile of the metropolitan planning area or State that includes identification of the locations of socio-economic groups, including low-income, minority, and Limited English Proficient (LEP) populations, as covered by the Executive Order on Environmental Justice and Title VI provisions?

Yes     No    4. Does the planning process seek to identify the needs of low income, minority, and LEP populations?

Yes     No    5. Does the planning process seek to utilize demographic information to examine the distributions across these groups of the benefits and burdens of the transportation investments included in the plan and TIP (or STIP)?

6. What methods are used to identify imbalance?

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II. SERVICE EQUITY	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
1. Does the planning process have an analytical process in place for assessing the regional benefits and burdens of transportation system investments for different socio-economic groups?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Does it have a data collection process to support the analysis effort?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Does this analytical process seek to assess the benefits and impact distributions of the investments included in the plan and TIP (or STIP)?	
4. How does the planning process respond to the analyses produced?	
<div style="border: 1px solid black; height: 100px; width: 100%;"></div>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Have imbalances been identified?	
III. PUBLIC INVOLVEMENT	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
1. Does the public involvement process have an identified strategy for engaging minority, low-income, and LEP populations in transportation decision making?	
2. What strategies, if any, have been implemented to reduce participation barriers for such populations?	
<div style="border: 1px solid black; height: 100px; width: 100%;"></div>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Has their effectiveness been evaluated?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. Has public involvement in the planning process been routinely evaluated as required by regulation?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Have efforts been undertaken to improve performance, especially with regard to low-income, minority, and LEP populations?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
6. Have organizations representing low-income, minority, and LEP populations been consulted as part of this evaluation?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
7. Have their concerns been considered?	

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8. What efforts have been made to engage low-income, minority, and LEP populations in the certification review public outreach effort?

Yes  No 9. Does the public outreach effort utilize media (such as print, television, radio, etc.) targeted to low-income, minority, or LEP populations?

10. What issues were raised, how are their concerns documented and how do they reflect on the performance of the planning process in relation to Title VI requirements?

11. What mechanisms are in place to ensure that issues and concerns raised by low-income, minority, and LEP populations are appropriately considered in the decision making process?

Yes  No 12. Is there evidence that these concerns have been appropriately considered?

Yes  No 13. Has the Metropolitan Planning Organization (MPO) made funds available to local organizations that represent low-income, minority, and LEP populations to enable their participation in planning processes?

Printed Name	Signature	Date
<b>Mail to:</b> Illinois Department of Transportation 2300 South Dirksen Parkway, Room 317 Attention: Title VI Specialist Springfield, Illinois 62764	<b>Email to:</b> <a href="mailto:dot.civilrights@illinois.gov">dot.civilrights@illinois.gov</a>	

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# **APPENDIX M**

## **IDOT's Language Assistance Plan**

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Language Assistance Plan for Addressing Limited English Proficiency

**I. PURPOSE**

Illinois is a diverse, multi-cultural state that includes many people who fluently speak languages other than English. If these individuals have a limited ability to read, write, speak, or understand English, they qualify as Limited English Proficient (LEP). Language for LEP individuals can be a barrier to accessing benefits or services, understanding and exercising rights, complying with applicable responsibilities, or understanding other vital information provided by government agencies.

The Illinois Department of Transportation (IDOT or the Department) must reduce language barriers for LEP individuals that may impede their meaningful understanding of important Department activities. Meaningful access means providing language access measures that result in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

IDOT funds and manages transportation projects and services. The opportunity to understand Department activities, provide project or program input, and receive vital information from the Department must be made meaningfully accessible to LEP individuals. IDOT is committed to ensuring the accessibility of these programs and activities to LEP individuals.

The Language Access Plan (Plan) provides guidance to IDOT staff who may interact directly with LEP individuals or whose work involves providing information or services to the public. The Plan provides protocols for identifying LEP individuals, language access measures, how to secure translation and interpretation services, staff responsibilities, and training related to ensuring meaningful access for LEP individuals.

For further questions regarding this Plan, please contact:

Marjorie Espina Hughes  
Bureau Chief, Bureau of Civil Rights  
Email: [marjorie.hughes@illinois.gov](mailto:marjorie.hughes@illinois.gov)  
Tel: 312-793-1443

**II. AUTHORITY**

- A. Title VI of the Civil Rights Act of 1964 – 42 USC 2000d et seq.
- B. Americans with Disabilities Act – 42 USC 12101 et seq.
- C. 28 CFR part 35 et seq. (ADA Title II regulations)
- D. United States Executive Order 13166
- E. Illinois Civil Rights Act of 2003 – 740 ILCS 23/5
- F. Illinois Information Technology Accessibility Act (“IITAA”) – 30 ILCS 587 et seq.

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**III. DEFINITIONS**

- A. “Department” – The Illinois Department of Transportation. Also referred to herein as “IDOT”.
- B. “Effective Communication” – Communication that is sufficient to provide the LEP individual with substantially the same level of access to services or information that would be received by individuals who are not LEP. This covers all media of communication.
- C. “Interpretation” – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- D. “Language Access Coordinator” – An IDOT employee, who has been designated by the IDOT Secretary or Chief of Staff, to field questions by Departmental staff regarding this Plan, to train staff on the use of this Plan, to regularly update and revise this Plan, and to receive and investigate complaints associated with violations of this Plan.
- E. “Language Access Working Group” – A group led by the Language Access Coordinator composed of representatives from Bureau of Civil Rights, Bureau of Personnel Management, Legal Services and the Secretary or their designee, charged with making revisions and updates to the Plan.
- F. “Language Access Services” – Oral and written language services required for LEP individuals to communicate effectively with staff and ensure meaningful access to, and equal opportunity to fully participate in the programs and activities administered by the Department.
- G. “Limited English Proficient (LEP)” – Individuals whose primary language is not English and who have a limited ability to read, speak, write, or understand English. Individuals may be proficient in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).
- H. “Meaningful Access” – Language service that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- I. “Point of Contact” – Instances where IDOT staff and volunteers provide services or service-related information to members of the public.
- J. “Public Engagement” – Any process that: (1) involves the public in identifying and solving challenges and problems and uses public input to make sustainable decisions; (2) educates or informs the public about a topic or issue; or (3) seeks to build meaningful connections and trust with the public through communication and interaction.
- K. “Translation” – The replacement of a word, phrase, or text in one language (source language) with an equivalent- meaning word, phrase, or text in another language (target language).
- L. “Vital Documents” – Paper or electronic written material containing information that is (1) critical for accessing programs, services, benefits, or activities, (2) directly and substantially related to public safety, or (3) required by law.

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**IV. RESPONSIBILITIES**

- A. It is the responsibility of the Department to ensure that all individuals have meaningful access to services and information regardless of national origin.
  
- B. It is the responsibility of the Department to provide language translation services to any LEP individuals that need information related to IDOT. Due to the strong possibility of miscommunication, the Department should not rely upon machine translation, informal translation or interpretation services, such as a family member of the LEP individual, or unapproved internet translation services. Due to the need to adhere to privacy laws, the Department should not rely on unauthorized third parties to provide translation or interpretation services.
  
- C. It is the responsibility of the Department to actively identify any LEP individuals.
  
- D. It is the responsibility of the Department to let LEP individuals know that they are entitled to receive language access services. The Department shall ensure that any outreach or education – including its website – includes information that apprises LEP individuals of their right to receive language access services from the Department. The Department shall prominently display a language access document or poster at each District location. This document or poster shall be visible to any member of the public that enters an IDOT office.
  
- E. It is the responsibility of the Department to enter into a contract with a vendor to provide translation and interpretation services in-person, telephonically, or via the internet. The Department may attempt to obtain short-term translation or interpretation services through use of a temporary contract or an inter-governmental agreement.
  
- F. It is the responsibility of the Department to maintain on staff a Language Access Coordinator. The Language Access Coordinator will be designated as the Department’s Title VI Specialist. In the event the Title VI Specialist position is vacant, the Bureau Chief, Civil Rights will be the designee.
  
- G. The Language Access Coordinator shall, at least once per calendar year, update and revise the Plan. This process involves assessing all points of contact IDOT has or may have with LEP individuals, determining the number or frequency of LEP client contact with the Department, determining the predominant non-English languages used by LEP individuals, identifying the language assistance services being utilized by the Department and whether additional such services are needed to facilitate effective communication for LEP individuals, identifying all IDOT points of contact with prospective LEP individuals, and any other tasks that would be reasonably necessary to maintain the Plan’s compliance with applicable State and Federal laws. The Language Access Coordinator shall create a Language Access Working Group to assist them with updating and revising the Plan. The Language Access Coordinator shall investigate any complaints associated with violations of the Plan and present findings to the Language Access Working Group and any recommended actions to reasonably address a complaint. Complaints that are not resolved in a timely or satisfactory manner may be referred to the Governor’s Office of New Americans for further review.
  
- H. It is the responsibility of the Language Access Coordinator to compile a list of IDOT forms, applications, and other documents that are commonly utilized by IDOT staff. The Language Access Coordinator shall, after identifying said documents, take reasonable steps to ensure that said documents are translated into Spanish,

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Polish, and Mandarin Chinese, at a minimum, and made available on the IDOT SharePoint server.

H. It is the responsibility of the Language Access Coordinator to document and track all requests for and uses of language access services. The Language Access Coordinator shall also document and track all complaints associated with alleged violations of the Plan, and any actions taken to address the alleged violations.

I. It is the responsibility of the Language Access Coordinator to identify any shortcomings with IDOT's identification of LEP individuals or with the language access services being utilized by the Department. The Language Access Coordinator shall, promptly upon identifying any shortcomings, appraise the OBWD Director of these and make recommendations on how the Department can address the problems.

J. It is the responsibility of the Language Access Coordinator to train IDOT staff on the use of the Plan, including how to identify LEP individuals and the language access services available to the Department.

Training will be conducted on the Plan and the process for supporting LEP individuals, including oral translation and translation of documents, on IDOT's learning management system. The training was first offered in winter 2023-24. Development of a recurring standalone Language Access Plan refresher training for IDOT employees is underway and will include specific details around using the Propio interpreter and Multilingual translation services. Training on the Plan will also include the following information: the importance of providing meaningful access to information and services; how to effectively and respectfully communicate and interact with LEP individuals; IDOT's policies and procedures related to providing language access services, including protocols for handling various encounters with LEP individuals; how to identify, assess, and record the language preferences of LEP constituents at the first point of contact; procedures to request and work with an interpreter, including when to use an interpreter; and what type of translated information is available to constituents and where it can be found.

In addition, the Department also covers an overview of the LAP as a component of every new hire's New Employee Orientation. This training involves background on the LAP, available interpreter services for employee use, and the employee's role in implementing the LAP as part of their job duties.

If the Title VI Coordinator learns that a Bureau or District requires additional training due to its frequency of contact with LEP individuals, the Title VI Coordinator will work with the Bureau Chief, Regional Engineer, or other department leader to arrange specialized training.

### **V. IDENTIFICATION OF LEP INDIVIDUALS & THE FOUR-FACTOR ANALYSIS**

A. Title VI and its regulations require IDOT to take reasonable steps to ensure meaningful access to the Department's information and services. What constitutes reasonable steps to ensure meaningful access is contingent on a four-factor analysis established by the U.S. Department of Justice.

B. The four-factor analysis is an individualized assessment that should be applied to all IDOT districts, offices, programs, and activities to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals. This Language Access Plan does not provide a four-factor analysis for IDOT's individual offices, districts, programs and activities.

C. The Language Access Coordinator, Title VI Liaisons, and district leadership are responsible for ensuring the four-factor analysis is conducted as needed for their programs and activities. The four factors are described in detail below, including guidance for weighing each factor.

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**FOUR-FACTOR ANALYSIS**

**Factor #1: The number or proportion of LEP individuals eligible to be served or likely to be encountered**

The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language access services are necessary. Ordinarily, “individuals eligible to be served or likely to be encountered” by a program or activity are those who are in fact, served or encountered in the eligible service population. This population will be program-specific and includes people who are in the program’s geographic area.

Offices, districts, and programs should first examine their prior experiences with LEP individuals and determine the breadth and scope of language access services needed. It is also important to include LEP populations that are eligible beneficiaries of IDOT programs, activities, or services but may be underserved because of existing language barriers.

Offices, districts, and programs unable to identify and examine prior experiences with LEP individuals should use reliable external data sources to determine the number or proportion of individuals likely to be served or encountered, such as census data for the geographic service area.

LEP individuals are defined as individuals 5 years or older who self-identify as speaking English less than “very well.” According to the U.S. Census Bureau 2021 American Community Survey estimates, Illinois’s population of individuals five years or older is 11,967,918. Of this population, 10,922,746 (or approximately 91.3%) speak English only or speak English “very well.” 1,045,172 (or approximately 8.7%) speak English less than “very well.”

The census divides primary languages other than English into four major language groups:

1. Spanish: includes Spanish, Spanish Creole, and Ladino.
2. Other Indo-European languages: includes most languages of Europe and the Indic languages of India. These include the Germanic languages, such as German, Yiddish, and Dutch; the Scandinavian languages, such as Swedish and Norwegian; the Romance languages, such as French, Italian, and Portuguese; the Slavic languages, such as Russian, Polish, and Serbo-Croatian; the Indic languages, such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.
3. Asian and Pacific Island languages: includes Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Pilipino; the Dravidian languages of India, such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.
4. All Other languages: includes Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and indigenous languages of Central and South America.

Of the population of 11,967,918 individuals five years or old in Illinois, 1,621,682 (or approximately 13.6%) spoke Spanish. Of this population, 639,357 (or approximately 39.4%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 673,542 (or approximately 5.6%)

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spoke other Indo-European languages. Of this population, 222,859 (or approximately 33.1%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 363,789 (or approximately 3%) spoke Asian or Pacific Island languages. Of this population, 145,023 (or approximately 39.9%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 125,174 (or approximately 1%) spoke another language. Of this population, 37,933 (or 30.3%) spoke English less than “very well.”

Individuals who have identified themselves as speaking English less than “very well” are considered to be LEP based on their limited ability to read, write, speak, or understand English.” This deficiency makes it difficult for them to have meaningful access to programs that may be offered by IDOT.

	Illinois			
	Total		Percent	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	11,967,918	±2,466	(X)	(X)
Speak only English	9,183,731	±28,902	76.7%	±0.2
Speak a language other than English	2,784,187	±28,959	23.3%	±0.2
SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	1,621,682	±19,196	13.6%	±0.2
5 to 17 years old	341,912	±8,919	2.9%	±0.1
18 to 64 years old	1,136,494	±13,139	9.5%	±0.1
65 years old and over	143,276	±3,373	1.2%	±0.1
Other Indo-European languages	673,542	±20,210	5.6%	±0.2
5 to 17 years old	86,899	±6,528	0.7%	±0.1
18 to 64 years old	458,429	±14,737	3.8%	±0.1
65 years old and over	128,214	±7,373	1.1%	±0.1
Asian and Pacific Island languages	363,789	±12,057	3.0%	±0.1
5 to 17 years old	40,738	±4,148	0.3%	±0.1
18 to 64 years old	258,074	±8,933	2.2%	±0.1
65 years old and over	64,977	±3,048	0.5%	±0.1
Other languages	125,174	±9,815	1.0%	±0.1
5 to 17 years old	23,537	±4,283	0.2%	±0.1
18 to 64 years old	88,622	±6,610	0.7%	±0.1
65 years old and over	13,015	±2,338	0.1%	±0.1

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	Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	1,045,172	±21,758	8.7%	±0.2
Speak only English	(X)	(X)	(X)	(X)
Speak a language other than English	1,045,172	±21,758	37.5%	±0.6
SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	639,357	±15,410	39.4%	±0.8
5 to 17 years old	68,775	±5,903	20.1%	±1.7
18 to 64 years old	473,655	±12,375	41.7%	±0.9
65 years old and over	96,927	±4,184	67.7%	±2.4
Other Indo-European languages	222,859	±9,325	33.1%	±1.0
5 to 17 years old	13,892	±2,502	16.0%	±2.6
18 to 64 years old	140,470	±7,481	30.6%	±1.3
65 years old and over	68,497	±5,192	53.4%	±2.3
Asian and Pacific Island languages	145,023	±8,652	39.9%	±1.8
5 to 17 years old	8,834	±2,069	21.7%	±4.4
18 to 64 years old	98,604	±6,948	38.2%	±2.1
65 years old and over	37,585	±2,815	57.8%	±3.5
Other languages	37,933	±4,152	30.3%	±2.5
5 to 17 years old	3,901	±1,258	16.6%	±5.8
18 to 64 years old	28,275	±3,192	31.9%	±3.1
65 years old and over	5,757	±1,527	44.2%	±6.8

Source: 2021 American Community Survey Estimates

**Factor #2: The frequency with which LEP individuals come in contact with the program**

Offices, districts, and programs should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking access. If LEP individuals access a program or service on a regular, consistent basis, then that program or service provider has greater language access duties than a program or service whose contact with LEP individuals is unpredictable or infrequent. However, offices, districts, and programs with infrequent or unpredictable interactions with LEP individuals must be prepared to provide language access services to LEP individuals.

In applying this factor, offices, districts, and programs should also consider whether outreach to LEP individuals could increase the frequency of contact with LEP language groups and remain mindful of the data analysis conducted under Factor #1 to identify the proportion of LEP population present in the service area. In anticipation of public-facing events (e.g., community engagement events, public meetings, etc.), IDOT will evaluate the potential participation by LEP populations and enlist the appropriate language interpretation or translation services in response.

The IDOT Bureau of Civil Rights enlisted Propio Language Services to support its language interpretation needs. Information about utilizing this account will be distributed to all IDOT employees this year in a mandatory training developed by the Bureau of Civil Rights. Propio will track the quantity of interpreter services requests made and completed by IDOT staff and report this data to IDOT regularly. IDOT will be able to more fully report on usage data when this plan is next updated. The mandatory training will also instruct

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employees on how to report other contacts with LEP individuals (e.g., ad hoc interpreter or translation encounters conducted by IDOT staff) by contacting the Title VI Coordinator or Title VI Specialist who will track this data.

#### **Factor #3: The nature and importance of the program, activity, or service provided by the program to people's lives**

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the greater the need for language access services. Offices, districts, and programs must determine whether denial or delay of access to services or information could have serious implications for the LEP individual. Generally, programs providing information and services related to accessing benefits, opportunities, or rights are considered high importance.

As part of its analysis, an office, district, or program may determine necessary language access measures include the translation of vital documents into the language of each LEP group that is frequently encountered, eligible to be served, or likely to be affected. Vital documents are paper or electronic written material containing information that is: (1) critical for accessing programs, services, benefits or activities; (2) directly and substantially related to public safety; or (3) required by law. Whether a document (or the information it solicits) is “vital” may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is neither accurate nor timely.

Examples of vital documents in the U.S. DOT LEP Guidance include: emergency transportation information, notices of public hearings regarding proposed transportation plans or projects, notices advising LEP individuals of free language assistance, and applications or instructions on how to participate in a program or activity or receive benefits or services.

IDOT has identified a list of vital documents that it is currently in the process of translating. For the full list, please contact [DOT.CivilRights@illinois.gov](mailto:DOT.CivilRights@illinois.gov). Documents will be translated using a vendor, such as Multilingual. IDOT will develop a language access complaint form and make it available to the public in the event that a member of the public believes that IDOT has not made appropriate documents available in their language. The complaint form may be obtained by emailing [DOT.CivilRights@illinois.gov](mailto:DOT.CivilRights@illinois.gov).

Visitors of IDOT’s website will find that it offers language translation for Arabic, Hindi, Polish, Chinese, Spanish, and Tagalog through the Illinois Department of Innovation and Technology’s translation portal.

#### **Factor #4: The resources available to IDOT and cost of language access**

IDOT’s available resources and the costs of providing language access services may impact the steps taken to provide meaningful access to LEP individuals. Generally, the department should have sufficient resources to provide meaningful access through reasonable language access measures. However, language access measures may cease to be reasonable where the costs imposed substantially exceed the benefits. Offices, districts, and programs should ensure any resource limitations are documented and explained before using this factor as a reason to limit language access.

The four-factor analysis necessarily implicates a spectrum of language access measures. For instance, written translations can range from translation of an entire document to translation of a short description of the document, and interpretation services may range from using telephone-based interpretation services to providing in-person interpretation at a public event. Language access measures should be based on what is

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necessary and reasonable after considering the Four-Factor Analysis. Offices, districts, and programs should proactively identify how to provide language access services efficiently and cost-effectively while ensuring meaningful access to LEP individuals.

IDOT has allocated funds to support outside vendors that will provide translation and interpretation services, as described above. It has also obligated funding to the printing and distribution of LEP notices and available services. The Department will continue to monitor whether further funding is required to advance implementation of the Plan.

### **VI. LANGUAGE ASSISTANCE SERVICES**

At first contact with a prospective LEP individual, the Department shall take all reasonable steps to assess whether the individual needs language access services. These steps include the following:

A. The Department shall ask professional, open-ended questions of the LEP individual to determine the individual's ability to speak or understand English. Open-ended questions are those that require a complex, non-static response; these are typically of the "who," "what", "when," "where," and "why" variety. Examples of open-ended questions include:

1. "What kind of assistance do you need from IDOT?"
2. "Why do you need this assistance?"
3. "What is your understanding of this program?"

B. The Department shall assess the type and nature of language access services required. This includes a determination of the language or languages in which the individual is proficient, and whether the individual needs translation services, interpretation services, or both. The Department should utilize an "I speak ... [language]" identification card, document, or poster, if available. A sample "I speak..." form can be found at: <http://justice.gov/crt/lep/resources/ISpeakCards2004.pdf>

1. Although use of informal interpreters – such as family members, machine interpretation, or using the internet – should be avoided, the Department may utilize such for purposes of assessing an individual's LEP status.
2. The Department should document these steps in a file and, if language access services are needed, note the type and nature of services needed. The Department shall send an e-mail notification to the Language Access Coordinator if it was determined that language access services were needed. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific language access services needed.

C. Once the Department determines that prospective LEP individual has limited English proficiency and has determined which types of translation or interpretation services are needed, the staff member shall obtain appropriate language access services for the individual.

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- D. If interpretation services are needed, the Department shall take the following steps:
1. A staff member shall contact the telephonic or internet language interpretation service provider with whom IDOT has contracted for this purpose. IDOT has contracted with Propio to provide interpreter services. These services can be accessed by calling 1-217-867-3023 and entering the account # 18354. For Spanish interpretation, the staff member should press 1. For all other languages, the staff member should press 8.
  2. In the event of an emergency, the staff member may utilize an LEP individual's family member or unauthorized internet translation software to provide temporary translation services. An emergency is defined as a situation where the LEP individual's person or property are in imminent risk of harm. The staff member should only utilize the family member or unauthorized internet interpretation software until the emergency has been addressed.
  3. The staff member or supervisor should direct any questions in utilizing these steps to IDOT's Language Access Coordinator.
  4. The Department shall document these steps and send an e-mail notification to the Language Access Coordinator. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific interpretation services utilized.
- E. If translation services are needed, the Department shall take the following steps:
1. The staff member shall contact the translation service provider with whom IDOT has contracted for this purpose.
  2. If the Department has not yet entered into such a contract, then the staff member shall contact his or her supervisor and relay the LEP individual's need for translation services. The supervisor shall contact the Bureau of Business Services Procurement Section to ensure that temporary translation services can be obtained for the LEP individual's need for translation services.
  3. In the event of an emergency, the staff member may utilize the LEP individual's family member or unauthorized internet or machine translation software to provide temporary translation services. The staff member should only utilize the family member or unauthorized internet or machine translation software until the emergency has been addressed.
  4. The staff member or supervisor should direct any questions in utilizing these steps to IDOT's Language Access Coordinator.
  5. The Department shall document these steps and send an e-mail notification to the Language Access Coordinator. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific translation services utilized.

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November 26, 2025

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Marjorie Espina Hughes  
Bureau Chief, Civil Rights,  
IDOT Office of Business &  
Workforce Diversity

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Date

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## **APPENDIX N**

### **Complaint Log**

#### **Title VI complaints**

IDOT did not receive any Title VI complaints in FY 2025.

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## **APPENDIX O**

### **Authority and Other Applicable EEO Laws**

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**Authority and Other Applicable EEO Laws**

The Federal and state EEO laws, rules and regulations that affect the Illinois Department of Transportation are identified. When there is a discrepancy between Federal law and state or local law, Federal law supersedes the latter unless state or local law is more stringent.

**Federal Laws:**

1. **Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d** prohibits discrimination by government agencies that receive Federal funds. No person in the United States shall be excluded from participation in or otherwise discriminated against on the grounds of race, color, or national origin under any program or activity receiving Federal financial assistance. If an agency is found in violation of Title VI, that agency may lose its Federal funding.
2. **Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794** prohibits discrimination based on disability for entities receiving Federal financial assistance. Section 504 states (in part): No otherwise qualified individual with a disability in the United States, as defined in section 705(20) of this title, shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service.
3. **Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. § 12101** prohibits discrimination against persons with disabilities in private employment, public accommodations, transportation, state and local government services, and telecommunications. It covers employers in industries affecting commerce that have 15 or more employees for each working day in each of 20 or more calendar weeks in the preceding calendar year. The employment title of the law (Title I) prohibits employers from discriminating against a "qualified individual with a disability" regarding job applications, hiring, advancement, discharge, compensation, training, or other job-related privileges. In addition, employers are required to make any reasonable accommodation for such persons provided no "undue hardship" is imposed.
4. **Americans with Disabilities Act Amendments of 2008, (ADAAA)** changes the definition of the term "disability," clarifying and broadening that definition—and therefore the number and types of persons who are protected under the ADA and other Federal disability nondiscrimination laws.
5. **Executive Order 11246** prohibits any entity with Federal government contracts total \$10,000 or more in a 12-month period, from discriminating in employment based on race, color, religion, sex, or national origin.
6. **Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency,"** requires Federal agencies to examine the program, activities, and services they provide, identify any need for language services to those with limited

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English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Since DOT provides Federal financial assistance to other parties, such as states, those entities must also develop guidance for their recipients on complying with LEP requirements.

7. **Uniformed Services Employment and Reemployment Rights Act (USERRA), 42 U.S.C. § 4301-4335** USERRA protects the job rights of individuals who voluntarily or involuntarily leave employment positions to undertake military service. USERRA also prohibits employers from discriminating against past and present members of the uniformed services, and applicants to the uniformed services. The U.S. Department of Labor, Veterans Employment and Training Service (VETS) is authorized to investigate and resolve complaints of USERRA violations.
8. **Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. §2000ff** this law makes it illegal to discriminate against employees or applicants because of genetic information. Genetic information includes information about an individual's genetic tests and the genetic tests of an individual's family members, as well as information about any disease, disorder or condition of an individual's family members (*i.e.* an individual's family medical history). The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

**Illinois State Laws:**

1. **Illinois Human Rights Act, 775 ILCS 5/1-101** prohibits discrimination against any individual because of his or her race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, physical or mental disability, military status, sexual orientation, pregnancy, or unfavorable discharge from military service in connection with employment, real estate transactions, access to financial credit, and the availability of public accommodations.
2. **The State Officials and Employees Ethics Act (Ethics Act), 5 ILCS 430/15-5 et. seq.**, provides protection to employees who: Disclose or threaten to disclose to their supervisor or any public body an act or omission that the employee reasonably believes to be a violation of law, rule or regulation by another employee; provide information or testify before any public body conducting an investigation hearing or inquiry into a violation of law, rule, or regulations; or Assist or participate in a proceeding to enforce the Ethics Act.
3. **The Illinois Equal Pay Act of 2003, 820 ILCS 112/1** prohibits employers with four or more employees from paying unequal wages to men and women performing the same or substantially similar work, requiring equal skill, effort, responsibility and under similar working conditions; unless such wage difference is based upon a seniority system, merit system, a system measuring earnings by quantity or quality of production or factors other than gender. This law expands the Federal Equal Pay Act of 1963 by covering more workers, providing better enforcement mechanisms and improving public awareness.

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4. **The Illinois Civil Rights Act of 2003, 740 ILC 23/5** prohibits State, county, or local government in Illinois from discrimination by (1) excluding a person from participation in, deny a person the benefits of, or subject a person to discrimination under any program or activity on the grounds of that person's race, color, national origin, or gender; or (2) utilizing criteria or methods of administration that have the effect of subjecting individuals to discrimination because of their race, color, national origin, or gender.
  
5. **Executive Order 2010-02** establishes the Governor's Office of the New Americans (GONA) to collaborate with State agencies and community organizations, to identify best practices and develop policies that are culturally and linguistically sensitive to the unique needs of immigrant communities to assist New Americans in overcoming barriers such as language. Pursuant to the executive order, it required state agencies to develop a New Americans Plan to address language issues of limited English proficient (LEP) persons. As part of GONA's assessment of current LEP policies, it created a survey for State agencies to assess language services.

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## APPENDIX P

### Definitions

**Adverse Effects** – The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include but are not limited to Bodily impairment, infirmity, illness or death; air, noise and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; adverse employment effects; displacement of persons, businesses, farms, or non-profit organizations; increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; denial of, reduction in, or significant delay in the receipt of benefits of IDOT programs, policies, or activities. (U.S. Department of Transportation Order 5610.2(a))

**Affirmative action** - A good faith effort to eliminate past and present discrimination in all federally assisted programs, and to ensure future nondiscriminatory practices. 23 CFR § 200.5

**Beneficiary** - Any person or group of persons (other than States) entitled to receive benefits, directly or indirectly, from any federally assisted program, i.e., relocatees, impacted citizens, communities, etc. 23 CFR § 200.5

**Citizen participation** - An open process in which the rights of the community to be informed, to provide comments to the Government and to receive a response from the Government are met through a full opportunity to be involved and to express needs and goals. 23 CFR § 200.5

**Complaint** – Written (and signed) or oral explanation of alleged discriminatory action(s).

**Compliance** - That satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made. 23 CFR § 200.5

**Deficiency status** - The interim period during which the recipient State has been notified of deficiencies, has not voluntarily complied with Title VI Program guidelines, but has not been declared in noncompliance by the Secretary of Transportation. 23 CFR § 200.5 - Definitions.

**Discrimination** - An act (or action) whether intentional or unintentional, through which a person in the United States, solely because of race, color, religion, sex, or national origin, has been otherwise subjected to unequal treatment under any program or activity receiving financial assistance from the Federal Highway Administration under Title 23 United States Code (U.S.C.). 23 CFR § 200.5

**Disparate Impact** – A facially neutral procedure/practice that has a disproportionate, adverse impact on protected individuals, while lacking a substantial legitimate justification. (recipient/sub-recipient cannot directly or through contractual/other arrangements, utilize criteria which have

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the effect of subjecting individuals to discrimination because of their race, color, or national origin or have the effect of defeating the objectives of the program as regards to individuals of a particular race, color, or national origin). 49 C.F.R. §21.5(b)(2); 28 C.F.R. §42.104(b).

**Disparate Treatment** – Similarly situated persons are treated differently because of their race, color, or national origin (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.) 42 U.S.C. §2000d

**Facility** - Includes all, or any part of, structures, equipment, or other real or personal property or interests therein, and "the provision of facilities" includes the construction, expansion, renovation, remodeling, alternation, or acquisition of facilities. 23 C.F.R. § 200.5

**Federal assistance** - Includes:

- (1) Grants and loans of Federal funds,
- (2) The grant or donation of Federal property and interests in property,
- (3) The detail of Federal personnel,
- (4) The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient, and
- (5) Any Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

23 CFR § 200.5

**Language Access Plan (LAP)** - A written plan outlining meaningful access to program information, providing managers with details of the agency's language assistance services and documentation requirements.

**Limited English Proficient (LEP)** Individuals - Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

**Local Public Agency (LPA)** is any government entity in the state of Illinois that is a sub-recipient of funding, including quasi-municipal corporations or special purpose districts.

**Metropolitan Planning Organization (MPO)** is the policy-making board made up of representatives from local government and transportation authorities. They are created to ensure regional collaboration in the transportation planning process for urban areas with a population over 50,000.

**Noncompliance** - A recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort in implementing all of the Title VI requirements. 23 CFR § 200.5.

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**Persons** - Where designation of persons by race, color, or national origin is required, the following designations ordinarily may be used:

- White not of Hispanic origin,
- Black not of Hispanic origin,
- Hispanic,
- Asian or Pacific Islander,
- American Indian or Alaskan Native.

Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or a regional basis. 23 CFR § 200.5

**Program** - Includes any highway, project, or activity for the provision of services, financial aid, or other benefits to individuals. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by the recipient of Federal financial assistance or provided by others through contracts or other arrangements with the recipient. 23 CFR § 200.5

**Program area officials** - The officials in FHWA who are responsible for carrying out technical program responsibilities. 23 CFR § 200.5

**Recipient** - Any State, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision, or instrumentality thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal assistance is extended, either directly or through another recipient, for any program. Recipient includes any successor, assignee, or transferee thereof. The term "recipient" does not include any ultimate beneficiary under any such program. 23 CFR § 200.5

**Secretary** - The Secretary of Transportation as set forth in 49 C.F.R. § 21.17 (g) (3) or the Federal Highway Administrator to whom the Secretary has delegated his authority in specific cases. 23 CFR § 200.5

**State highway agency** - That department, commission, board, or official of any State charged by its laws with the responsibility for highway construction. The term "State" would be considered equivalent to "State highway agency" if the context so implies. 23 CFR § 200.5

**Sub-recipient** - an entity that receives federal funds from IDOT under an award and is accountable to IDOT for the use of the federal funds. This may be an LPA, but also could be a non-profit, educational institution, or MPO.

**Title VI Program** - The system of requirements developed to implement Title VI of the Civil Rights Act of 1964. References in this part to Title VI requirements and regulations shall not be limited to only Title VI of the Civil Rights Act of 1964. Where appropriate, this term also refers to the civil rights provisions of other Federal statutes to the extent that they prohibit discrimination on the grounds of race, color, or national origin in programs receiving Federal financial assistance of the type subject to Title VI itself. These Federal statutes are:

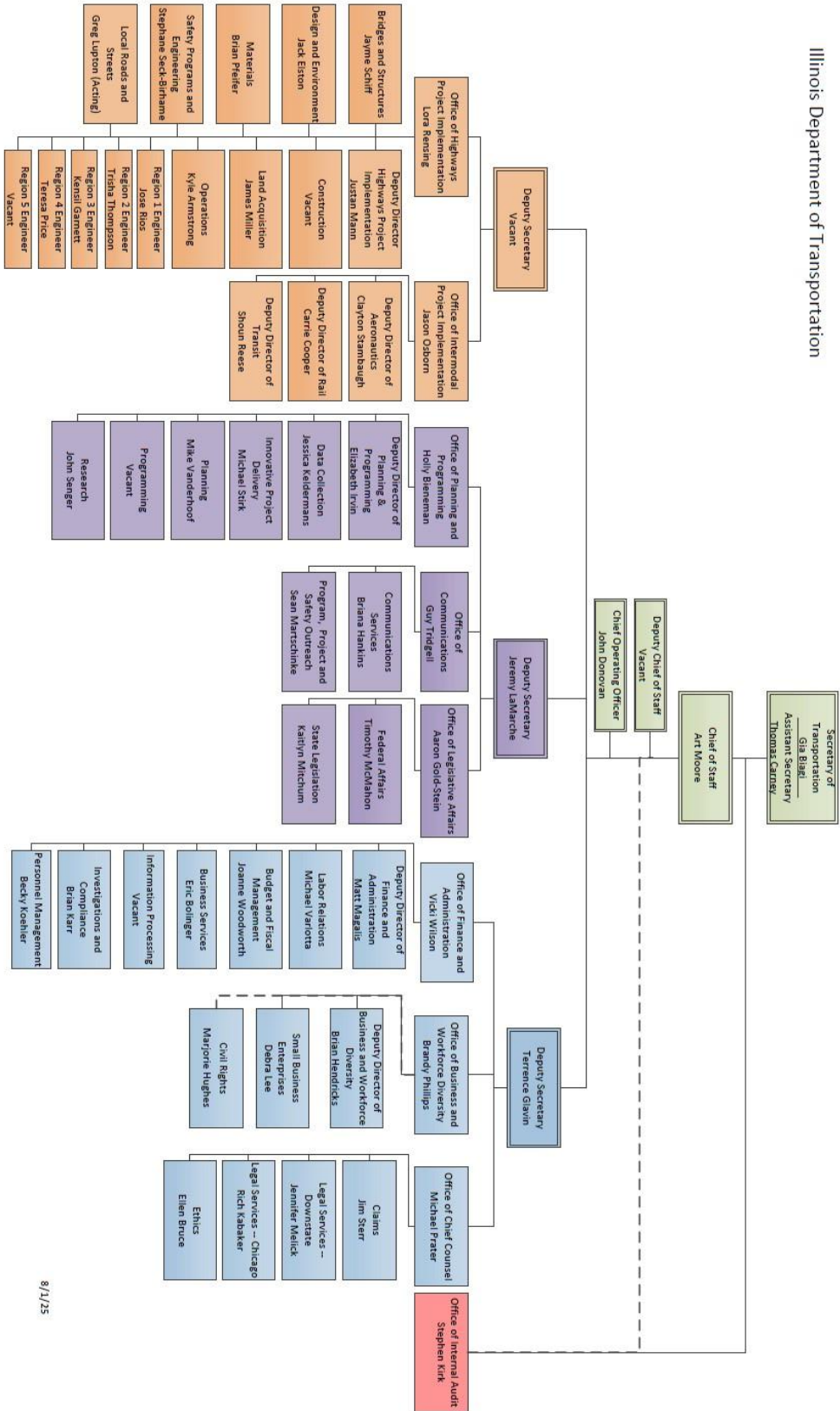
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- (1) Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d-d4 (49 C.F.R., Part 21; the standard DOT Title VI assurances signed by each State pursuant to DOT Order 1050.2; Executive Order 11764; 28 C.F.R. § 50.3);
- (2) Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. §§ 4601-4655) (49 C.F.R. Part 25; Pub. L. 91-646);
- (3) Title VIII of the Civil Rights Act of 1968, amended 1974 (42 U.S.C. §§ 3601-3619);
- (4) 23 U.S.C. § 109(h);
- (5) 23 U.S.C. § 324;
- (6) Subsequent Federal-Aid Highway Acts and related statutes.  
23 CFR § 200.5

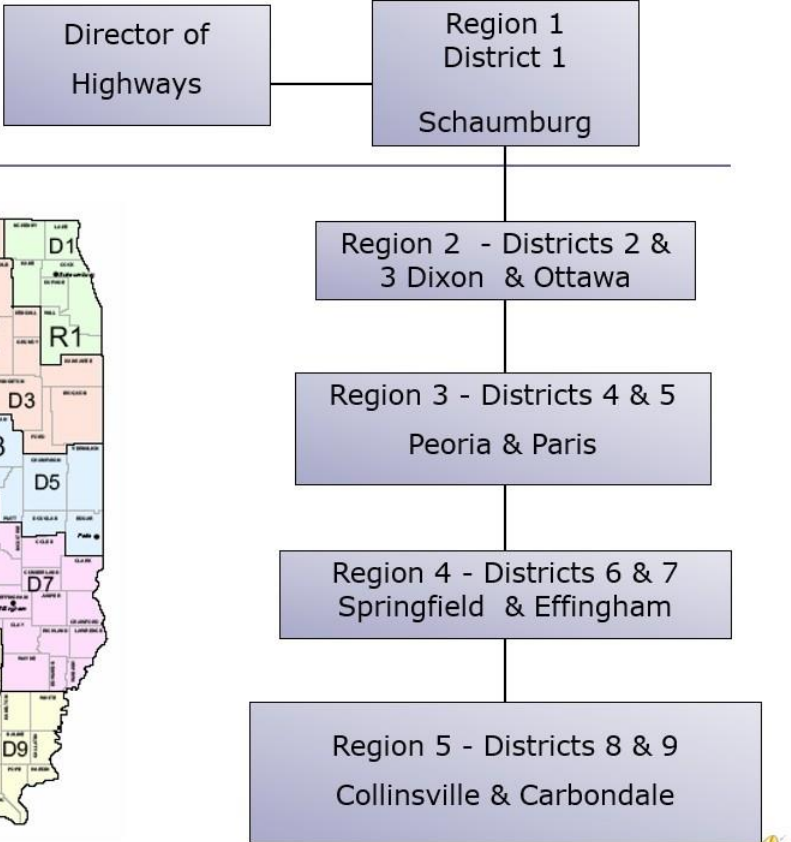
# APPENDIX Q

## IDOT Organizational Chart



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# Division of Highways



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# APPENDIX R

## Bureau of Civil Rights Organizational Chart

Bureau of Civil Rights  
Organizational Chart

