

Title VI Plan  
St Clair County, Illinois  
September 30, 2013

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## **Introduction**

St Clair County is dedicated to an inclusive process that allows all citizens affected by the county's activities to have a voice. St Clair County receives federal funding from the Federal Highway Administration (FHWA) the Federal Transit Administration (FTA), the Environmental Protection Agency (EPA), the U.S. Department of Housing and Urban Development (HUD), and other state and federal agencies. Effective use of federal funding for the benefit of the entire county requires that the county be as inclusive as possible to serve the widest range of citizens.

## **Title VI Plan Policy Statement**

St Clair County assures that no person shall on the grounds of race, color, gender, age, disability or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) (Title VI), or because of disability as provided by the Americans with Disabilities Act (ADA), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The county further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that the county distributes federal aid funds to another entity, the county will include Title VI language in all written agreements and will monitor for compliance.

## **Authority**

Federal law also requires that St Clair County have policies and procedures in place to ensure that all citizens are included in county activities and that anyone who believes they have been discriminated against may file a complaint and have their complaint reviewed and answered. The federal regulatory authority for non-discrimination originates in three areas: Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990 and Executive Order 13166 related to citizens with limited English proficiency. All three are illustrated more fully below.

“It has been The Federal Highway Administration's (FHWA's) and the Federal Transit Administration's (FTA's) longstanding policy to actively ensure nondiscrimination under **Title VI of the 1964 Civil Rights Act** in federally funded activities. Under Title VI and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, gender, or national origin. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients and contractors whether those programs and activities are federally funded or not.” (Source: United States Department of Transportation)

The **Americans with Disabilities Act of 1990** (ADA) prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services. To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. (Source: [www.ADA.gov](http://www.ADA.gov))

On August 11, 2000, the President signed **Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency"**. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to federally conducted and federally assisted programs. It is expected that county and program plans, as stipulated by the Executive Order, will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The U.S. Department of Justice's Policy Guidance Document, "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With Limited English Proficiency" (LEP Guidance) sets forth the compliance standards that recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and

A listing of additional relevant statues and Executive Orders covered by this policy Include:

The Rehabilitation Act of 1973

The Federal-Aid Highway Act of 1973

The Age Discrimination Act of 1975

The Civil Rights Restoration Act of 1987

23 United States Code, Section 140

Executive Order 12250 – U.S. Department of Justice – Leadership and Coordination of Nondiscrimination Laws

Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations

Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency

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## Vietnam Era Veterans' Readjustment Assistance Act of 1974

### **Title VI Delegation**

ST CLAIR COUNTY  
Mark Kern, County Board Chairman  
10 Public Square  
Belleville, IL 62223  
618-277-6600

Linda Franks  
Title VI Coordinator  
10 Public Square  
Belleville, IL 62223  
Phone: 618-825-3266 (if no answer 618-277-6790)  
Fax: 618-236-1190  
Email: [titlevi@co.st-clair.il.us](mailto:titlevi@co.st-clair.il.us)

### **Organization of Responsibilities**

The St Clair County Board Chairman is responsible for implementation of the agency's Title VI program. As authorized by the St Clair County Board, the Title VI Coordinator is responsible for initiating and monitoring Title VI and ADA activities; ensuring compliance with assurances, policy, and program objectives; reviewing Title VI complaints following procedural guidelines; gathering data and documentation from staff regarding Title VI compliance; conducting or facilitating training programs on Title VI issues and regulations for County employees; preparing required reports; updating plans as necessary; working with staff to develop and disseminate Title VI program information to contractors, consultants and the general public – including providing written or verbal information in languages other than English; and other responsibilities as required, .

### **Title VI Notification**

In compliance with 49 CFR Section 21.9(d), St Clair County and subrecipients provide information to the public regarding Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. St Clair County fulfills this compliance through the following actions:

1. Posting the county's policy statement regarding Title VI on the website along with the complaint procedure and Title VI and LEP brochures.

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2. St Clair County has printed material available upon request, much of which may also be accessed by using the links listed below:

Your Rights Under Title VI of the Civil Rights Act of 1964:

<http://www.justice.gov/crt/about/cor/Pubs/TitleVIEng.pdf>

<http://www.justice.gov/crt/about/cor/Pubs/TitleVISpan.pdf>

Limited English Proficiency (LEP) Rights

[http://www.lep.gov/LEP\\_beneficiary\\_brochure.pdf](http://www.lep.gov/LEP_beneficiary_brochure.pdf)

[http://www.justice.gov/crt/about/cor/lep/LEPKYR\\_Spanish.pdf](http://www.justice.gov/crt/about/cor/lep/LEPKYR_Spanish.pdf)

Environmental Justice - What it Means:

<http://www.epa.state.il.us/environmental-justice/policy.html>

Americans with Disabilities Act (ADA): [www.ada.gov/](http://www.ada.gov/)

3. St Clair County inserts the preferred, or abbreviated, “Notice to the Public” (See Appendix 1) in all significant publications that are distributed to the public.

### **Resolving Complaints**

This complaint procedure is for any person who believes that he or she, on the basis of race, color, national origin, gender, or disability has been excluded from or denied the benefits of, or subjected to discrimination by St Clair County in relation to any program or activity administered by St Clair County or its subrecipients, consultants, and/or contractors. This complaint procedure applies to matters related to Title VI, ADA or LEP.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be used for resolution at any stage of the process. The Title VI Coordinator will make every effort to pursue a timely resolution to the complaint. Initial interviews with the complainant and the respondent, if applicable, will request information regarding specifically requested relief and settlement opportunities. A copy of the complaint form is provided as Appendix 2.

## Complaint Procedure

**1. Submission of Complaint.** Any individual or group may file a written complaint with St Clair County Title VI Coordinator. The mailing address and contact information follows:

Linda Franks  
Title VI Coordinator  
10 Public Square  
Belleville, IL 62223  
Phone: 618-825-3266 (if no answer 618-277-6790)  
Fax: 618-236-1190  
Email: [titlevi@co.st-clair.il.us](mailto:titlevi@co.st-clair.il.us)

The complaint must be filed within one hundred eighty (180) calendar days after the date the discrimination occurred. A complaint form may be downloaded at [www.co.st-clair.il.us](http://www.co.st-clair.il.us) or is available in paper form from the Title VI Coordinator. Upon request, assistance will be provided to any person(s) unable to read or write English or who requires a form in an alternative format due to a disability. Persons who are deaf or hard of hearing may contact St Clair County through (TTY).

The complaint form must be as complete as soon as possible and must meet the following requirements:

- a. The complaint shall be in writing and signed by the complainant(s).
- b. Include the date of the alleged act of discrimination.
- c. Present a detailed description of the issues.

Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established.

Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return.

Complainants have the right to complain directly to the appropriate federal agency as well. Complainants have 180 days to file a complaint with the appropriate federal agency.

**2. Receipt of Complaint.** Within fifteen (15) days after receiving a complaint, the Title VI Coordinator will a) forward a copy of the complaint to the appropriate designated federal or state agency related to the complaint, if required and b) send a written acknowledgement to the complainant advising that the complaint will be investigated.

In order to be accepted, a complaint must involve a covered basis such as race, color, national origin, gender, disability, or retaliation and the allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor, or, in the case of ADA allegations, an entity open to the public.

A complaint may be dismissed for the following reasons:

- a. The complainant requests the withdrawal of the complaint.
- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

Once the complaint is accepted, the Title VI Coordinator will log it in a database identifying the following: complainant's name, basis of the complaint, alleged harm, race, color and national origin of the complainant.

**3. Referral to Review Officer.** The Title VI Coordinator will forward the complaint to the St Clair County Board Chairman, who will appoint the Title VI Coordinator or other review officer, or committee, to investigate the complaint. The review officer or committee will complete the review within 45 days after the county received the complaint and will make a recommendation about the merits of the complaint and, if necessary, what steps will be taken to address the complaint.

**4. Complaint Decision.** The review officer or committee will forward his/her/its recommendation to the County Board Chairman and the Title VI Coordinator for review. The County Board Chairman will issue the county's response to the complainant(s) and any respondent(s), if applicable. (A respondent may be any subrecipient, consultant or contractor named in the complaint.)

**5. Requests for Reconsideration.** If the complainant disagrees with the response, he or she may request reconsideration by submitting a request within fifteen (15) days after receipt of the response. Any affected party may submit information and/or documentation in writing to the Title VI Coordinator in support of their request for reconsideration of the recommendation. Upon review of the additional information and documentation, the Title VI Coordinator will consult with the County Board Chairman and have ten (10) days to either reaffirm or reverse the original recommendation and provide written notice to the complainant and respondent. If neither party requests reconsideration, the recommendation becomes final.

**6. Settlement.** If the final recommendation or reconsideration supports the allegation(s), the Title VI Coordinator will attempt to negotiate an amicable settlement of the issues in dispute. Formal, written settlement agreements will require the review of the county's counsel prior to execution and will require the signatures of the parties, the Title VI Coordinator, and the County Board Chairman.

**7. Submission of Complaint to the State of Illinois Department of Transportation, the Federal Highways Administration or the Federal Transit Administration or other**

**appropriate federal agency.** If the complainant is dissatisfied with St Clair County's resolution of the complaint, he or she may also submit a written complaint to the state or appropriate federal agency in accordance with the requirements of the state or federal agency. *NOTE: Complaints must be filed with federal agencies no later than 180 days after the alleged discrimination occurred. Prompt action after receiving St Clair County's final response is necessary to ensure review by state or federal agencies.*

Illinois Department of Transportation  
Office of Civil Rights  
2300 S. Dirksen Parkway  
Springfield, IL 62764  
Ph: 217-782-2762  
Fax: 217-524-4063

Civil Rights Officer, Region V  
Federal Transit Administration, Office of Civil Rights  
FTA Region 5 Office,  
200 West Adams Street, Suite 320, Chicago, Illinois 60606.  
Telephone (312) 353-2789, Fax (312) 886-0351

Federal Highway Administration  
Office of Civil Rights  
1200 New Jersey Ave., S.E.  
8th Floor E81-314  
Washington, DC 20590

Federal Transit Administration  
Office of Civil rights  
Attention: Title VI Program Coordinator  
East building, 5th Floor -TCR  
1200 New Jersey Ave., S.E.  
Washington, DC 20590

Title VI Coordinator  
Office of Civil Rights and Civil Liberties  
U.S. Department of Homeland Security  
Mail Stop 0800  
Washington, DC 20520

For appropriate agency for ADA complaints go to <http://www.ada.gov/cguide.pdf> or call the ADA information line at 800 – 514 - 0301 (voice) or 800 - 514 - 0383 (TTY)

**8. Confidentiality.** To the extent feasible, confidentiality shall be maintained during the formal and informal investigation process.

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**9. Investigation records.** Records will be maintained in accordance with applicable Federal guidelines, or in their absence, applicable state guidelines.

### **Monitoring of Subrecipients/Consultants for Title VI Compliance**

The Title VI Coordinator monitors sub-recipients and consultants for compliance with Title VI as described below:

1. Provides Title VI compliance requirements to all subrecipients/consultants as part of the contracting process.
2. Conducts a desk review for Title VI compliance of subrecipients/consultants using a Title VI Compliance Questionnaire.
3. Reviews the completed questionnaire from the subrecipient/consultant for evidence of adequate procedures to ensure compliance with the Title VI provisions in the agreement.
4. If a subrecipient/consultant is not in compliance with Title VI, the Title VI Coordinator and assigned staff will work with the subrecipient/consultant to correct the deficiency. This may include providing technical assistance and guidance available from the Title VI Coordinator or St Clair County staff. If the subrecipient/consultant does not correct the deficiency the Title VI Coordinator may take corrective action or implement other remedies as provided in the executed agreement. When conducting Title VI compliance reviews, St Clair County will reduce to writing any recommended remedial action agreed upon by St Clair County and sub-recipient, and provide a copy of the letter within a period not to exceed 45 days.

To date, as a result of St Clair County monitoring, no subrecipients/consultants have been found not to be in compliance with Title VI.

### **Title VI Investigations, Complaints or Lawsuits**

St Clair County maintains a list of complaints filed alleging discrimination on the basis of race, color, national origin, sex, age, disability or religion. This list shall include the date the investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken in response to the investigation, lawsuit or complaint.

The Title VI Coordinator maintains these files. St Clair County has had no Title VI investigations, complaints, or lawsuits in the last 3 years.

### **Compliance Reviews**

A summary of civil rights compliance reviews conducted by other local, state or federal agencies during the last 3 years are as follows:

Department of Justice – ADA Compliance of Programs, Services and Facilities

(Source: Fact Sheet [http://www.ada.gov/stclare\\_pca/stclare\\_factsht.htm](http://www.ada.gov/stclare_pca/stclare_factsht.htm)) On May 11, 2010, the Department of Justice entered into a settlement agreement with St. Clair County under title II of the Americans with Disabilities Act of 1990 (ADA).

*The Department initiated a compliance review of the County as part of Project Civic Access, a Departmental initiative to ensure greater access for individuals with disabilities to state and local government programs, services, activities, and facilities. An on-site survey of the County's buildings, programs, and services was conducted in June, 2008. County staff worked cooperatively with the Department throughout the compliance review process in order to reach an agreement.*

*The text of the Settlement Agreement specifies the modifications the County will be making to its programs, services, and facilities.*

*The Settlement Agreement will remain in effect for three years from May 11, 2010. The Department will actively monitor compliance with the Agreement, which will remain in effect until the Department has confirmed that all required actions have been completed.*

Department of Labor – ADA Compliance, WIA Services

Investigation is pending by the US Department of Labor, subsequent to conclusion by Illinois Department of Commerce and Economic Opportunity alleging denial of services.

### **Anticipated Construction Projects for Next Three Years (July 2014-2017)**

Baldwin Road: Roadway Reconstruction, reduce Curves, Add Shoulders (federal: \$873,000)

Frank Scott Parkway: Intersection Improvements at Old Collinsville Rd, Hartman Ln, and Greenmount Rd (federal: \$2,293,019)

Frank Scott Parkway: New 2-lane Roadway Cross St in Shiloh to IL 158 (\$2,240,000)

MidAmerica Airport: New Security System; Building Expansion; and Plane Ramping (costs to be determined)

St Clair County Jail: Addition and Renovation (cost to be determined)

### **Grant Funding**

St Clair County is the recipient of numerous state and local grants, of which many have as their origin federal funding. A list of grants for FY2011 appears in Appendix 4 of this plan.

### **General Title VI Regulation Considerations**

Consideration of Title VI regulations are made throughout St Clair County's planning and programming activities, including the following:

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**1. Demographic Profile:** St Clair County has obtained statistical data from the East-West Gateway Council of Governments, the St Louis region's metropolitan planning organization (MPO), on race, color, national origin, language spoken, income level, persons with disabilities and sex of the population within its corporate boundaries. This information is updated as new census data becomes available to ensure that St Clair County is providing access to the benefits, services, and information for all individuals, including low-income and minority populations. A review of the demographic data permits St Clair County to determine if there have been any changes in the population and if strategies need to be adjusted in order to serve any new or growing populations. Strategies may include identifying additional local partners that serve a new demographic to ensure the population is notified of the public meetings and given the opportunity to be involved in the planning process.

For a general overview of this data for the county see the demographic profiles provided in Appendix 3.

**2. Identifying the Needs of Low-Income and Minority Populations:** As a member of East-West Gateway Council of Governments -- a regional metropolitan planning organization (MPO) -- St Clair County employs its MPO when undertaking federally and state funded transportation projects to assist in planning and programming. East-West Gateway's metropolitan transportation planning process identifies the needs of low-income and minority populations primarily through public engagement efforts and a data driven analytical process.

- a. *Public Engagement:* The MPO's Public Involvement Plan is designed to ensure a regional public involvement process that is proactive in providing complete information, timely public notice, diverse techniques, full public access to key decisions and continual involvement in the development of regional plans and community building programs. The agency's public engagement efforts include surveys, focus groups and open house meetings that are designed to elicit comment and create discussion of issues and challenges facing the region's citizens. The public engagement process includes measures to target underrepresented communities through notifications and requests to participate sent specifically to organizations serving those communities. Additionally, open houses and focus groups are scheduled in coordination with these organizations to provide low-income and minority populations with accessible opportunities to be involved in the process and express their needs.
- b. *Analytical Process:* St Clair County's planning process, largely undertaken by the East-West Gateway Council of Governments (the MPO), also includes collecting, mapping and analyzing data that identifies the needs of low-income and minority populations. This analysis includes review of system reliability, mobility, accessibility, safety and security, preservation and housing plus transportation affordability along with demographic data. Through this analysis MPO planners can determine where more investment is needed to better serve the county's population, including the low-income and minority populations.

Through these processes, St Clair County has determined that a well-integrated transportation system that involves multi-modal options, such as transit, walk and bike access are important in meeting the needs of low-income and minority populations. On the whole, a transportation

system should offer various travel modes, travel time and cost options to accommodate diverse user preferences and contribute to improved access. Further, St Clair County recognizes that low-income, minority and other underserved populations would endure an unfair burden if their needs are not considered as part of the transportation planning process

### **3. Limited English Proficiency**

St Clair County's MPO has a plan in place to address the challenges of citizens of Limited English Proficiency, who may want to participate in activities but cannot effectively do so due to language barriers. In certain cases, the MPO has an obligation to ensure that appropriate accommodations have been made to make information available to LEP communities. In order to fulfill this requirement, MPO staff completed a four-factor analysis, recommended by the federal government, to define the region's LEP communities. The results of this analysis allow the MPO to design, customize and implement LEP outreach strategies that ensure access and participation and are in compliance with federal guidelines and recommendations.

St Clair County is committed to serving all constituents equally, consistently and appropriately. Numbers of LEP persons vary in different parts of the county. Using the results of the LEP four-factor analysis, the MPO has outlined in its Title VI plan the reasonable steps needed to provide meaningful access to LEP individuals (both proactively and in response to specific requests) and create/implement a plan to achieve this goal. In particular, the MPO will determine the appropriate mix of written and oral language communications for LEP individuals, to include but not limited to in writing, on paper, over the Internet, written translations, oral assistance, or through commissioned written translation on reasonable request and work with local organizations that serve LEP persons in St Clair County.

More information on the LEP population can be found in Appendix 3. Anyone who believes they have the basis for an LEP complaint should contact the Title VI Coordinator and use the same complaint process as referenced above.

## **Appendix 1. Notice to the Public**

### **Title VI Notice to the Public**

The paragraph below will be inserted in all significant publications that are distributed to the public. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

*St Clair County hereby gives public notice that it is the policy of the county to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which St Clair County receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with St Clair County. Any such complaint must be in writing and filed with the county's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please see our web site at [www.co.st-clair.il.us](http://www.co.st-clair.il.us), or call (618) 618-825-3266 or 618-277-6790, or email [titlevi@co.st-clair.il.us](mailto:titlevi@co.st-clair.il.us).*

### **Abbreviated Title VI Notice to the Public**

The following shortened version of the above paragraph can be used in publications where space or cost is an issue, such as in classified newspaper announcements:

*St Clair County fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Complaint Form, go to [www.co.st-clair.il.us](http://www.co.st-clair.il.us), or call (618) 618-825-3266 or 618-277-6790, or email [titlevi@co.st-clair.il.us](mailto:titlevi@co.st-clair.il.us).*

## Appendix 2. Title VI Non-Discrimination Complaint Form

### Title VI Non-Discrimination Complaint Form

This form may be used to file a complaint with the St Clair County pursuant to discrimination laws, rules and regulations, including, but not limited to, Title VI of the Civil Rights Act of 1964, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency and the Americans with Disabilities Act of 1990.

If you need assistance completing this form, please contact us by phone at 618-825-3266 and ask for Linda Franks, (Title VI Coordinator).

Feel free to add additional pages if necessary. You are not required to use this form; a signed letter that provides the same information is sufficient to file your complaint.

Complaints of discrimination must be filed within 180 days of the alleged discrimination.

This form MUST be completed by the complainant or the complainant's designated representative.

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#### **Complainant's Personal Information:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: home/work \_\_\_\_\_ Cell \_\_\_\_\_

Name of person completing this form, if different from above: \_\_\_\_\_

Your relationship to the complainant indicated above: \_\_\_\_\_

---

#### **Alleged Discrimination – Details of Complaint:**

##### **I. Identify the agency, department or program that discriminated:**

Department/Company/Agency name: \_\_\_\_\_

Name of any individual, if known: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone if known: (Work) \_\_\_\_\_ (Fax) \_\_\_\_\_

Date(s) of alleged act: \_\_\_\_\_

Date alleged discrimination began: \_\_\_\_\_

Last or most recent date of alleged discrimination: \_\_\_\_\_

**II. What is the basis for this complaint?**

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you or others by the agency or department indicated above, please indicate below the basis on which you believe these discriminatory actions were taken.

Example: If you believe that you were discriminated against because you are African American, you would mark the box labeled "Race/Color" and write "African American" in the space provided.

Example: If you believe the discrimination occurred because you are female, you would mark the box labeled "Gender" and write "female" in the space provided.

**Check all that apply:**

- |  |   |
|--|---|
| <input type="checkbox"/> Race/Color _____      | <input type="checkbox"/> Religion _____   |
| <input type="checkbox"/> National Origin _____ | <input type="checkbox"/> Age _____        |
| <input type="checkbox"/> Gender _____          | <input type="checkbox"/> Disability _____ |

**III. Explain what happened:**

Please explain as clearly as possible what happened. Provide the name(s) of witnesses, fellow employees, supervisors, others involved in the alleged discrimination. Please include all information that you feel is relevant to the investigation. (Attach additional sheets if necessary and provide a copy of any written materials pertaining to your complaint.)

**IV. How can this/these issue(s) be resolved to your satisfaction?**

**V. What is the most convenient time and place for us to contact you about this complaint?**

**VI. If we will not be able to reach you directly, please give us the name and phone number of a person who can reach you and/or provide information about your complaint:**

Name: \_\_\_\_\_

Telephone Number: (    ) \_\_\_\_\_

**VII. If you have an attorney representing you concerning the matter raised in this complaint, please provide the following:**

Name of Attorney: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone number: (    ) \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Note: The laws enforced by St Clair County prohibit retaliation or intimidation against anyone because the individual has either taken action or participated in action to secure rights protected by these laws. If you experience retaliation or intimidation separate from the discrimination alleged in this complaint or if you have questions regarding the completion of this form, please contact:

Linda Franks  
Title VI Coordinator  
10 Public Square  
Belleville, IL 62223  
Phone: 618-825-3266 (if no answer 618-277-6790)  
Fax: 618-236-1190  
Email: [titlevi@co.st-clair.il.us](mailto:titlevi@co.st-clair.il.us)



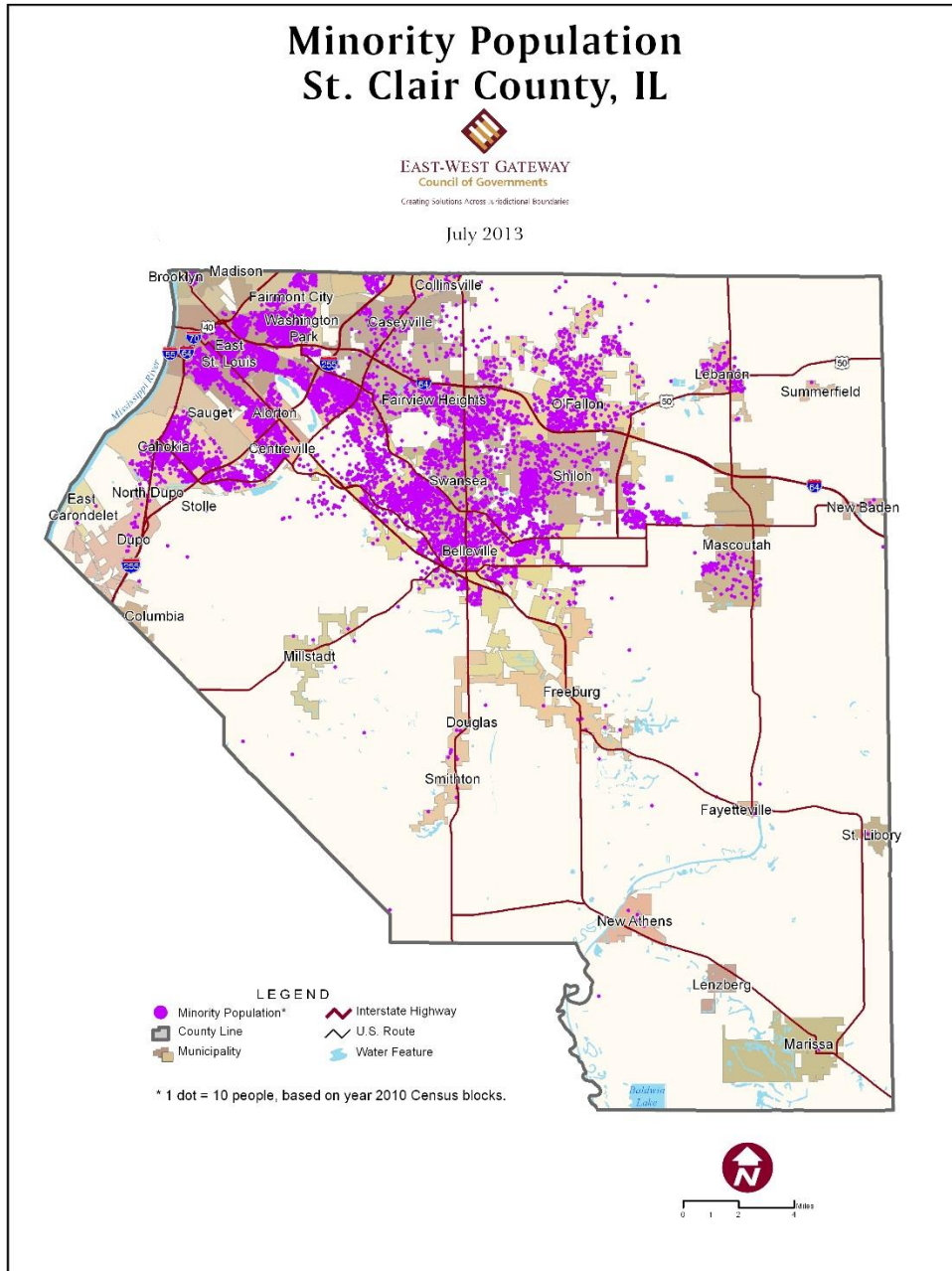
## Appendix 3. Demographic Data

### 3-I. St Clair County Minority Population

| Total Population | Non-Hispanic White | Minority | Minority Percent |
|------------------|--------------------|----------|------------------|
| 270,056          | 169,858            | 100,198  | 37.1             |

Source: U.S. Census 2010

Figure 1 displays the geographic distribution of minority population in St. Clair County, which appears to be most heavily concentrated in the northeastern and north central areas of St. Clair County.

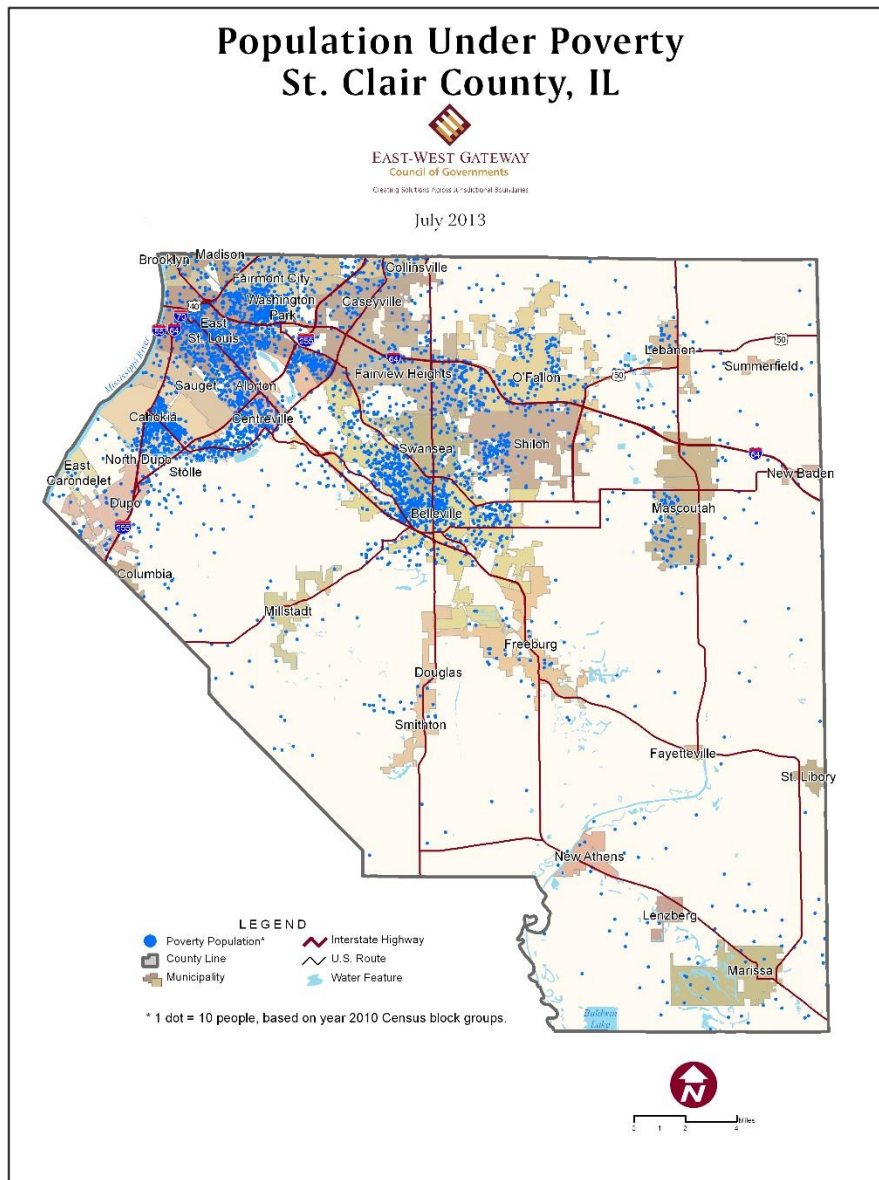


### 3-II. St Clair County Poverty Estimates in 2009

| Total Population | Population below Poverty | Percent below Poverty |
|------------------|--------------------------|-----------------------|
| 259,123          | 44,516                   | 17.2                  |

Figure 2 displays the geographic distribution of population under poverty during 2005-2009. Although poor populations are throughout St Clair County, they are largely concentrated in the northeastern and north central portions of the county, similar to the concentrations of minority populations (see Figure 1).

Figure 2. Geographic Distribution of Population under Poverty in St. Clair County

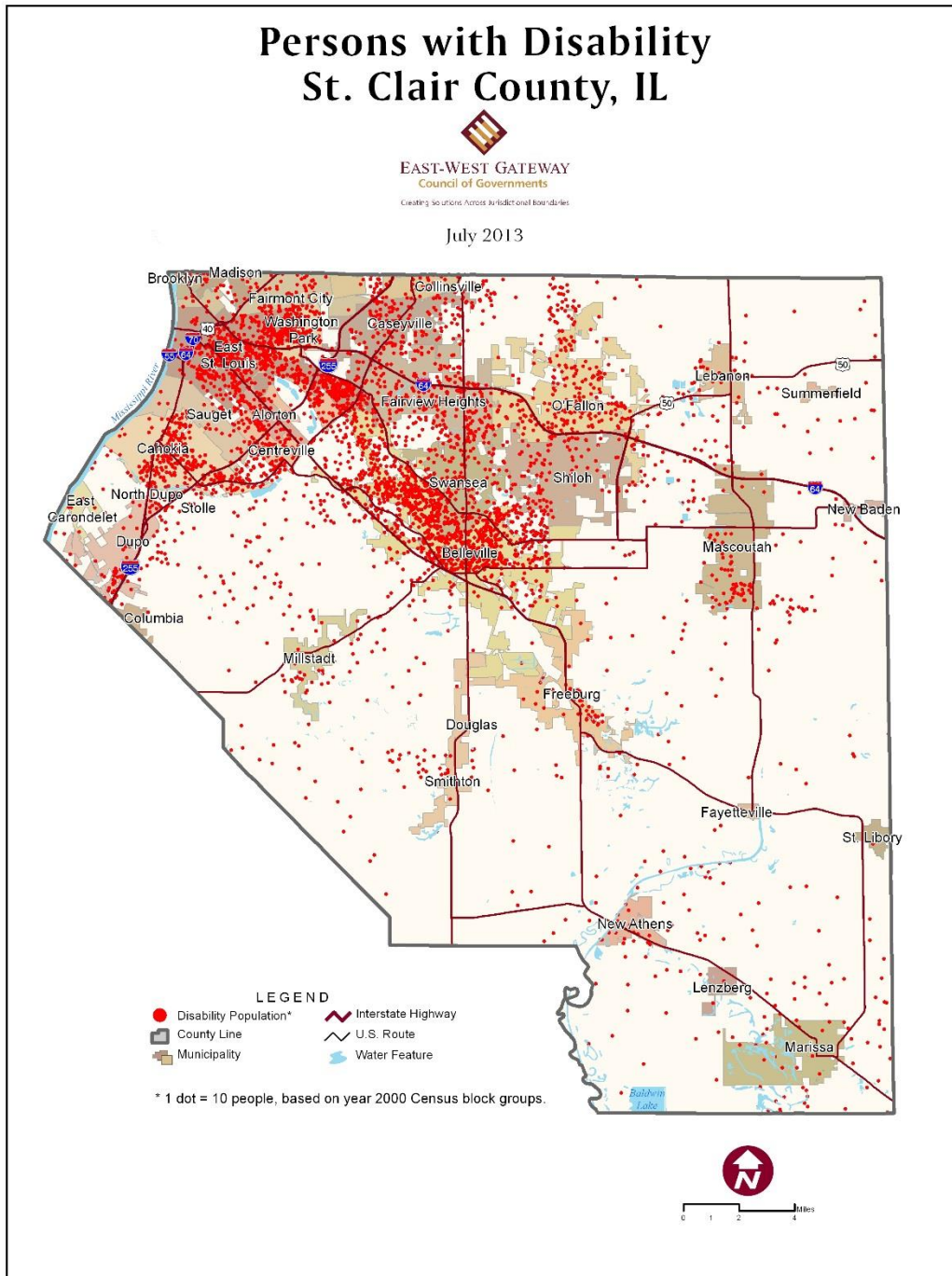


### 3-III. St Clair County Persons with One or More Disabilities

| Persons over Age 5 | Persons with Disabilities | Persons with Disabilities as % of Total Population over Age 5 |
|--------------------|---------------------------|---|
| 230,122            | 46,814                    | 20.3  |

Source: U.S. Census 2000

Figure 3. Geographic Distribution of Persons with Disability in St. Clair County

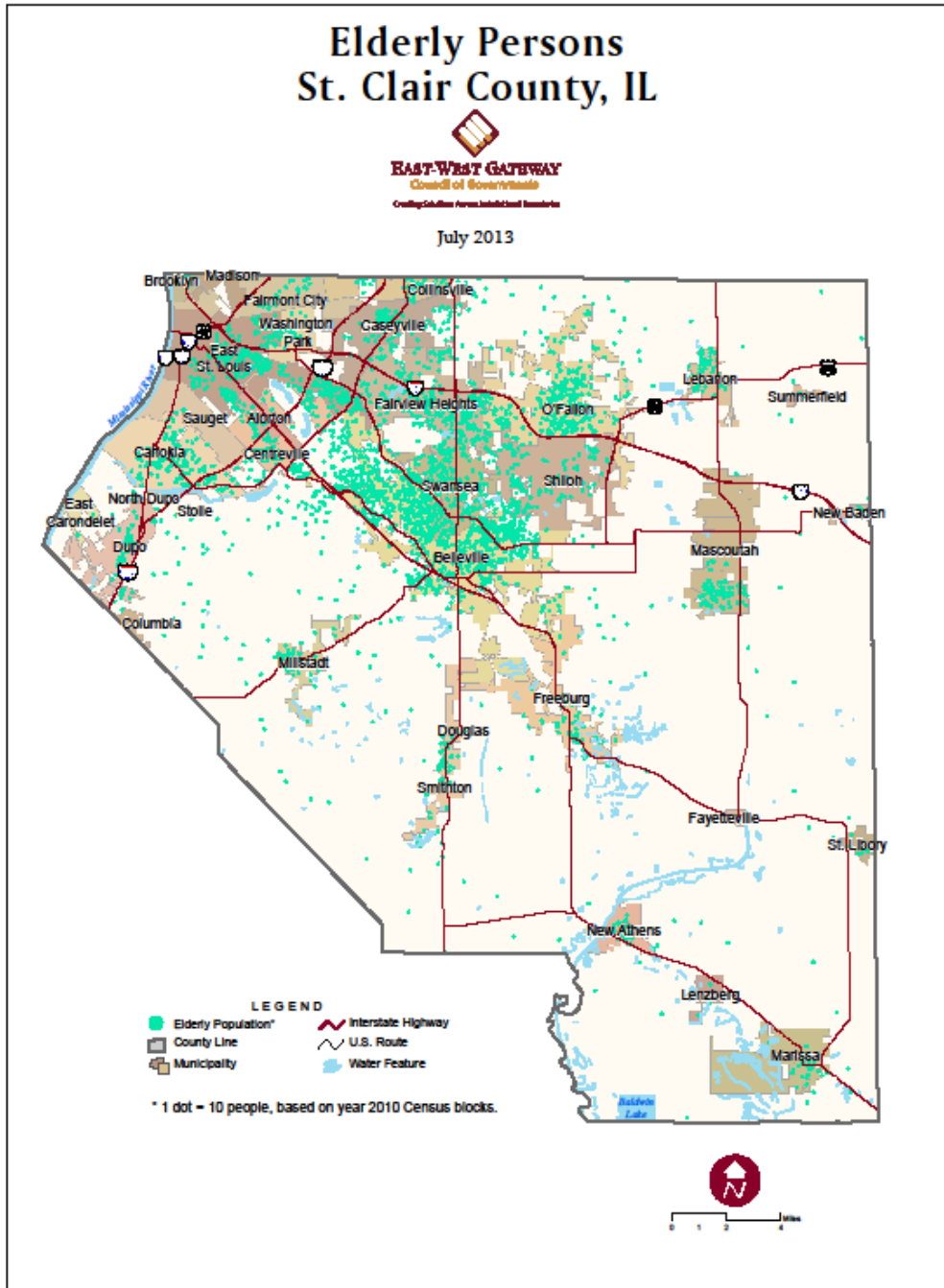


### 3-IV St Clair County Population – Persons Aged 65 and Older

| Total Population | Population below Poverty | Percent below Poverty |
|------------------|--------------------------|-----------------------|
| 263,617          | 33,356                   | 12.7                  |

Source: American Community Survey

Figure 4. Geographic Distribution of Elderly Population in St. Clair County

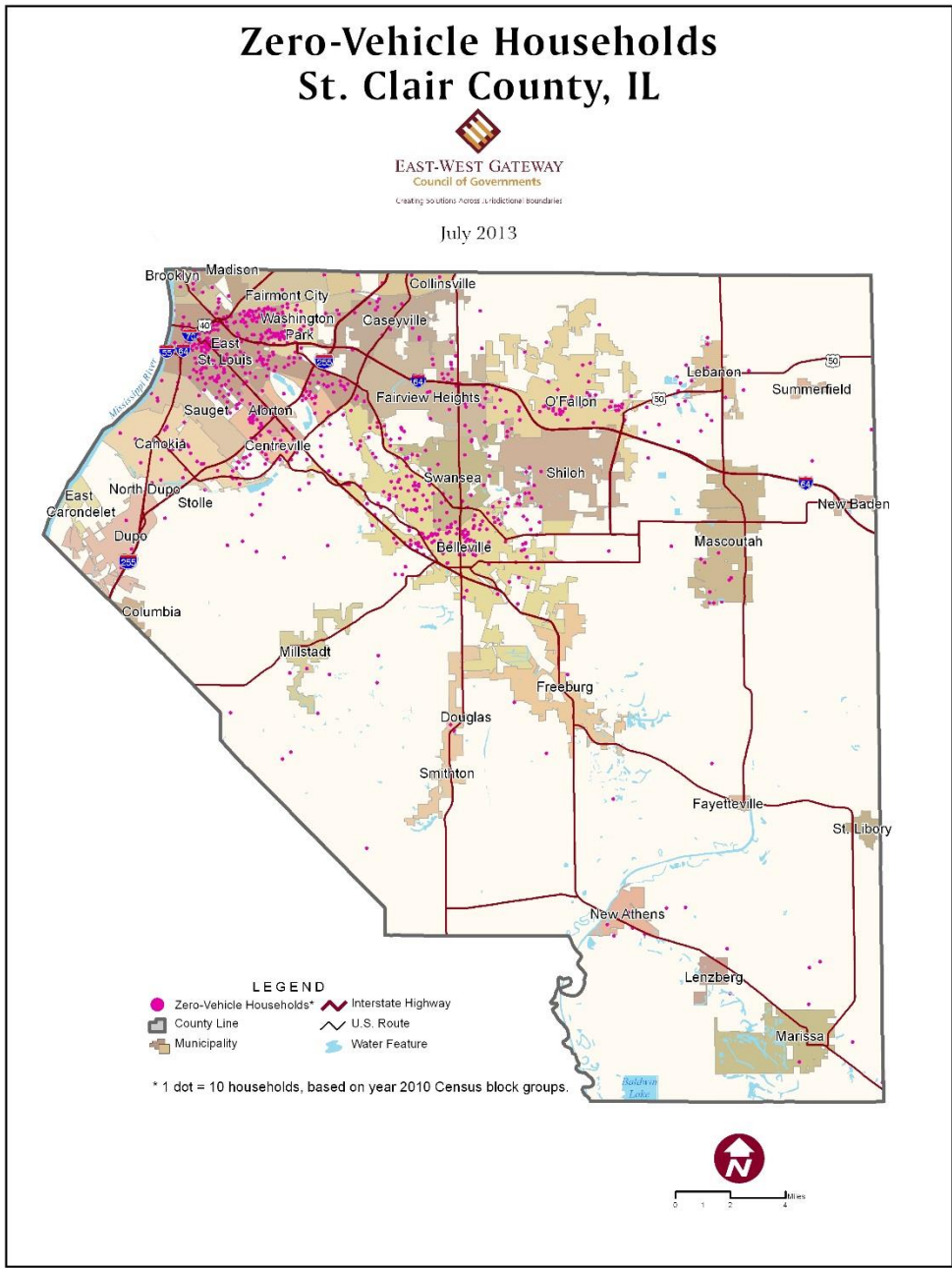


### 3-V. St Clair County – Zero-Vehicle Housing Units

| Total Occupied Housing Units | Zero-Vehicle Housing Units | Percent Zero-Vehicle Housing |
|------------------------------|----------------------------|------------------------------|
| 103,453                      | 8,815                      | 8.5                          |

Source: American Community Survey

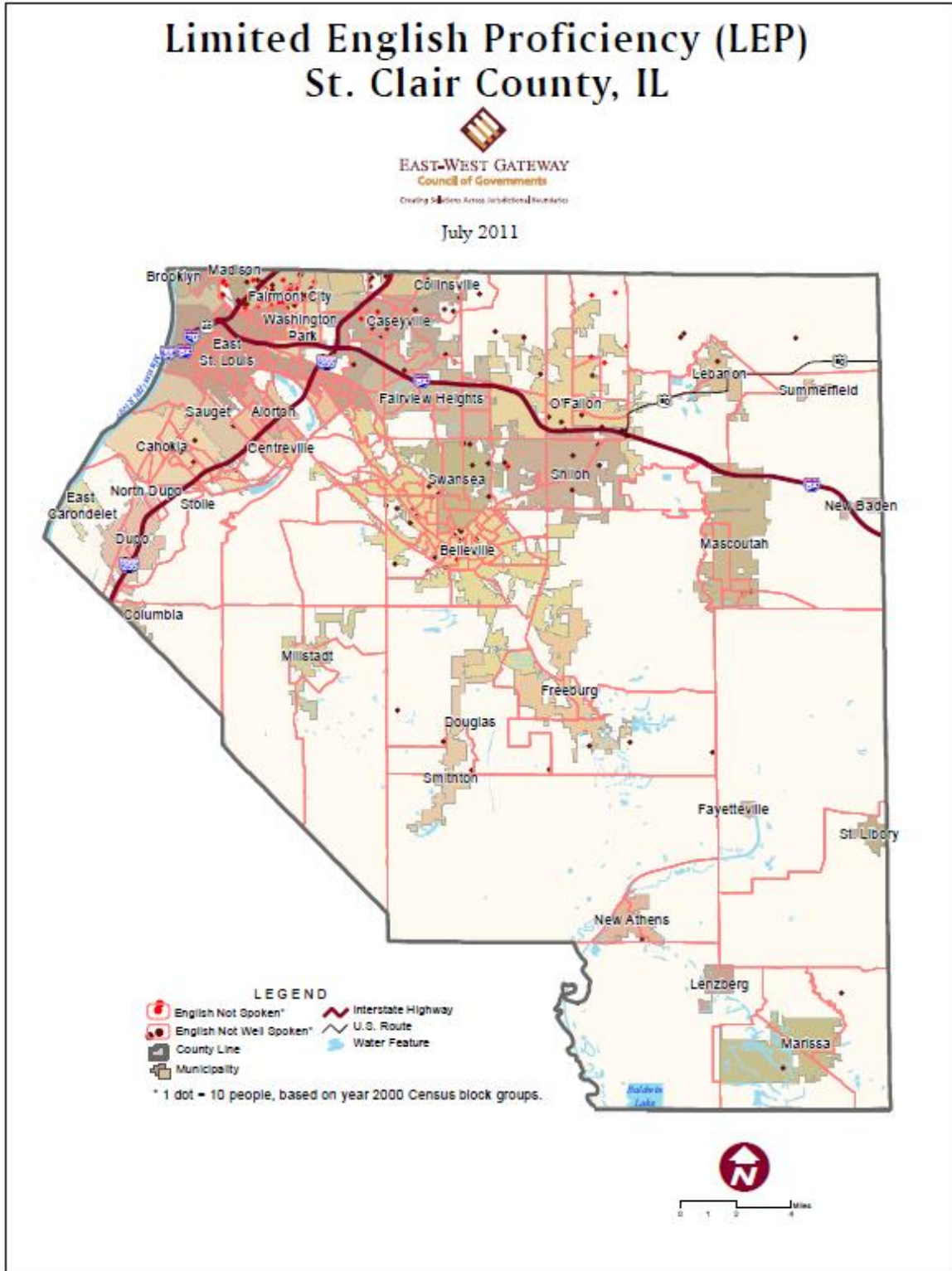
Figure 5. Geographic Distribution of Zero-Vehicle Households in St.Clair County. Households with no vehicles appear to be concentrated in the urbanized areas of the county, where public transit is more readily available.





### 3-VI. St Clair County – Limited English Population

Figure 5. displays the geographic distribution of Limited English Proficiency population in St. Clair County. LEP population appears to be largely concentrated in the northwestern area of St Clair County, particularly Fairmont City and Caseyville areas.



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## Appendix 4 Grants to St Clair County (FY 2011)

STATE AND LOCAL FUNDED GRANTS TO ST CLAIR COUNTY (Source: 2011 St Clair County Single Audit, St Clair County Auditor's office and Intergovernmental Grants Dept.)

State's Attorney Title IVD - IL Dept of Healthcare Family Services  
State's Attorney Title IVD - IL Dept of Healthcare Family Services  
Circuit Clerk Title IVD - IL Dept of Healthcare Family Services  
Circuit Clerk Title IVD - IL Dept of Healthcare Family Services  
Lien Releases - IL Dept of Healthcare Family Services  
Healthy Kids - IL Dept of Healthcare Family Services  
All Kids - IL Dept of Healthcare Family Services  
Genetics Education - IL Dept of Public Health  
Genetics Education - IL Dept of Public Health  
Childhood Lead Poisoning - IL Dept of Public Health  
West Nile Virus - IL Dept of Public Health  
Tanning Facilities Program - IL Dept of Public Health  
Tattoo BodyArt - IL Dept of Public Health  
HIV Jail Project - IL Dept of Public Health  
Ryan White Part B - IL Dept of Public Health  
Breast Cervical Cancer - IL Dept of Public Health  
Wisewoman - IL Dept of Public Health  
Ticket for the Cure - IL Dept of Public Health  
IL Tobacco Communities - IL Dept of Public Health  
Reality Illinois - IL Dept of Public Health  
Local Health Protection - IL Dept of Public Health  
Community Putting Prevention to Work - IL Dept of Public Health  
Redeploy Illinois - IL Dept of Human Services  
FamilyCase Management - IL Dept of Human Services  
Target Prenatal Case Mgt - IL Dept of Human Serv  
Teen Parent Services - IL Dept of Human Services  
Teen Pregnancy Prevention - IL Dept of Human Services  
Solid Waste Enforcement - IL Environmental Protection Agency  
Stand Against Cancer - Springfield Urban League  
Linking to Care Project - Public Health Inst of Metro Chicago  
Project Best Practices - University of Illinois  
Auto Theft - IL Criminal Justice Info Authority  
Mike Apron Extension Phase I - IL Dept of Transportation  
State Free Lunch Breakfast - IL State Board of Education  
Victim Witness Office of the IL Attorney General  
Grant Management Program 01 - IL Dept of Commerce Economic Opportunity  
Tobacco Enforcement Grant - IL Dept of Revenue  
Academy Training Grant - IL Law Enforcement Training Standards B  
Workforce Investment Act – Department of Labor  
Community Service Block Grant – Community Action Agency  
Low Income Home Energy Asst – Community Action Agency  
Weatherization – Community Action Agency  
Community Development Block Grant – HUD  
Neighborhood Stabilization – HUD  
Lead Hazard Mitigation - HUD

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