The Arc of the Quad Cities Area

Title VI Program

Section 5310 Transportation
November 24, 2026

This program implements the Title VI Nondiscrimination Policy approved by The Arc Board of Directors on November 17, 2026. It describes nondiscrimination protections, complaint handling, public participation, language assistance, and oversight for The Arc's transportation services.

Program contact

Alice Orsborn
Director of Quality Improvement
orsborna@arcqca.org
309-429-6075
The Arc of the Quad Cities Area
4016 9th Street, Rock Island, IL 61201
www.arcqca.org

Governance and approval

The Board-approved Title VI Nondiscrimination Policy governs this program. The President and Chief Executive Officer is responsible for developing, implementing, and periodically reviewing the program with the Board. Michael Glanz, President and CEO, approves and signs the program on behalf of the agency under the Board's Consolidated Vehicle Procurement Program resolution.

Approved for implementation and submission on behalf of The Arc of the Quad Cities Area:

Signature: _____
Michael Glanz, President and Chief Executive Officer
Approval date and effective date: _____

Supporting documents: Board-approved Title VI Nondiscrimination Policy, Board approval minutes, and current Consolidated Vehicle Procurement Program resolution.

1.0 Agency service and responsibilities

The Arc is a private nonprofit organization receiving Section 5310 capital assistance through IDOT in the form of vehicles. It receives no Section 5310 operating or service grant funds. The Arc operates these vehicles itself; no outside organization uses them and no Section 5310 assistance is passed to other organizations.

The vehicles serve people residing in The Arc's homes in Rock Island County, Illinois, including people with accessibility needs. Rides are arranged through home or program staff. This is residential transportation rather than a general-public ride service. Rock Island County is the service-population area for this program; destinations may be outside that area as needed.

1.1 Nondiscrimination

No person shall, on the basis of race, color, or national origin, be excluded from participation in, denied the benefits of, or subjected to discrimination under covered programs and activities. The Arc provides meaningful language access and prohibits retaliation against a person who files a complaint or participates in an investigation.

Title VI addresses race, color, and national origin. Disability discrimination, reasonable modification, and accessible communication are addressed through the ADA Transportation and Reasonable Modification procedures under the Accessibility Policy. Staff will route a complaint involving more than one protection to the appropriate processes without requiring the person to identify the legal basis correctly.

1.2 Assigned responsibilities

The President and CEO oversees implementation and program review. Alice Orsborn, Director of Quality Improvement, is the Title VI contact and coordinates complaint intake, investigation, language assistance, program records, and reporting to IDOT. The Chief Quality Officer maintains complaint files and statistics and coordinates Senior Leadership Team review. No person directly involved in the disputed action participates in its review.

The staff-only Risk Management and Accessibility Committee oversees transportation concerns. Home and program staff identify needs, arrange transportation, help people submit feedback or complaints, and implement approved assistance. Admissions identifies language needs at entry; QIDPs coordinate ongoing assistance.

1.3 Governing documents

This program operates with the following agency documents: Title VI Nondiscrimination Policy, November 17, 2026; Individual Complaint Resolution Policy (PO-CONRICCR) and Procedure (PR-CONRI.CCR), revised December 2025; LCCD Policy, September 20, 2022; LCCD Procedure, January 2022; and LCCD Plan, October 2024. The transportation-specific provisions below supplement those agency documents.

2.0 Title VI complaint procedure

This process implements the Individual Complaint Resolution Policy and Procedure for complaints based on race, color, or national origin. It is available to any person alleging discrimination in a covered program, including applicants, participants, and representatives. A person may file directly with Alice Orsborn without first pursuing informal resolution through a QIDP.

2.1 Filing and assistance

File within 180 calendar days of the alleged discrimination. Submit the Title VI Complaint Form in Appendix B or a written complaint by email to orsborna@arcqca.org, by mail, or by hand delivery to Alice Orsborn, Director of Quality Improvement, The Arc of the Quad Cities Area, 4016 9th Street, Rock Island, IL 61201. Call 309-429-6075 for assistance. The form is optional. Staff will help reduce an oral complaint to writing and obtain the complainant's confirmation. Electronic submissions do not require a second mailed original.

Provide contact information, the date and description of the incident, the basis of discrimination, and relevant witnesses or documents if available. Free language assistance and accessible formats are available. A person assisting the complainant may help submit the complaint. The Arc will not retaliate or restrict service because a person complains.

2.2 Intake and investigation

The Director of Quality Improvement records the receipt date, acknowledges the complaint, determines the appropriate jurisdiction and process, and forwards it to the responsible reviewing officials. A complaint received by another staff member must be forwarded promptly; the original receipt date governs agency response timing.

Consistent with the existing complaint procedure, the Director of Quality Improvement completes an investigation and written recommendation to the Chief Quality Officer within one week of receipt of the formal complaint. Investigation may include interviews and review of records and relevant practices. Any necessary additional information is requested promptly, with language and communication assistance offered.

The Chief Quality Officer brings the matter to the Senior Leadership Team. A written agency response is provided within two weeks of receipt. Persons directly involved in the action or decision are excluded from review. If these timelines cannot be met, the complainant receives a documented explanation and expected response date. Urgent protection and needed access measures must not be postponed while a complaint is reviewed.

The response explains the allegations, findings, reasons, and corrective action, if any, and provides appeal and external-filing information. The Chief Quality Officer retains the response and records the outcome. Alice coordinates follow-up on corrective actions.

2.3 IDOT notification

The Director of Quality Improvement notifies IDOT's Civil Rights Office of discrimination complaints within 72 hours and provides the closure letter or letter of finding within 72 hours of the decision. Notifications are directed to DOT.Complaint@illinois.gov; telephone: 217-782-2762. Copies and evidence of notification are retained with the complaint record.

3.0 Appeals and complaint records

3.1 Internal appeal

A complainant dissatisfied with the agency response may appeal in writing to the Chairperson, Human Rights Advisory Committee, The Arc of the Quad Cities Area, 4016 9th Street, Rock Island, IL 61201. Staff will assist with documenting an appeal. Under the Individual Complaint Resolution Procedure, the appeal is due within ten working days after receipt of the management response.

The Committee Chair notifies the Committee and Director of Quality Improvement. Quality Improvement informs the Chief Quality Officer and President and CEO and obtains any necessary information releases. The Chair convenes a hearing with the complainant within ten working days after receipt of the appeal. The Committee may request records and meet with staff.

The Committee prepares a recommendation for Board action at the next regularly scheduled Board meeting. The Chair communicates the Board's decision in writing to the complainant and Quality Improvement. The Board Secretary ensures communication to responsible staff, and the Committee may request implementation follow-up. Complaint and appeal records are retained by the Chief Quality Officer and Director of Quality Improvement.

3.2 External complaints

The person may file directly with IDOT or FTA without completing The Arc's informal, investigation, or appeal steps. Using The Arc's process does not extend an external agency's filing deadline.

Illinois Department of Transportation
Bureau of Civil Rights, Attn: Title VI Program Coordinator
2300 South Dirksen Parkway, Room 317
Springfield, IL 62764

Federal Transit Administration
Office of Civil Rights, Attn: Title VI Program Coordinator
1200 New Jersey Avenue SE
Washington, DC 20590

3.3 History and tracking

The Arc has had no complaints, investigations, or lawsuits alleging discrimination based on race, color, or national origin during the three years ending November 24, 2026.

The Chief Quality Officer's log will identify each complaint, investigation, or lawsuit; date; alleged discrimination basis; summary; status; findings; actions; and dates of required notifications. Alice will ensure transportation-related matters are identified for Title VI reporting. Records will be retained under applicable grant and agency retention requirements, with preservation of pending matters and legal holds.

4.0 Public participation

The Arc obtains participant and family feedback through annual satisfaction surveys, annual individualized planning meetings, family surveys, and monthly house meetings. These activities provide opportunities to discuss transportation needs, barriers, and concerns.

4.1 Inclusive participation

Home and program staff will invite all affected participants to provide feedback, including minority participants and people with limited English proficiency. Families and representatives may participate as appropriate to the person's preferences and authority. Participation will not depend on fluency in English or ability to complete a written survey independently.

Staff will offer assistance, alternate formats, and free interpretation or translation as needed. Participants may provide feedback privately through their QIDP or Alice rather than speaking in a group. Staff will seek input before significant transportation changes affecting residents, explain proposed changes in understandable language, and document how concerns were considered.

4.2 Review and follow-through

Quality Improvement will summarize themes from surveys and planning feedback. Transportation concerns will be referred to the Risk Management and Accessibility Committee and appropriate leadership. The agency will record the issue, assigned response, action taken, and communication back to participants. Feedback alleging discrimination will also enter the Title VI complaint process.

4.3 Outreach for prospective participants

Admissions and Quality Improvement will use accessible program information and referral relationships to inform prospective participants and their representatives about transportation, nondiscrimination, and free language assistance. The Arc will monitor whether language barriers limit access among eligible populations and adjust outreach accordingly.

4.4 Committee membership

The Risk Management and Accessibility Committee is an internal, staff-only committee that oversees transportation concerns. The Board of Directors and Human Rights Advisory Committee carry out their respective governance and complaint-appeal responsibilities. Quality Improvement maintains applicable committee membership and selection records.

5.0 Language assistance analysis

The language assistance program operates under the agency's LCCD Policy, Procedure, and Plan. The agency-wide LCCD Plan covers Rock Island, Mercer, and Henry Counties in Illinois and Scott County in Iowa. The Section 5310 residential transportation service population is in Rock Island County.

5.1 Factor one — population likely to be served

All current residential participants speak English as their primary language, and no current family members or guardians require interpretation. Admissions and QIDPs identify the language needs of applicants, participants, families, and guardians at entry and as needs change.

The agency-wide LCCD Plan identifies Spanish as the largest LEP language group in its service area. Quality Improvement maintains the Rock Island County demographic analysis as supporting documentation and uses county language data, intake information, and assistance requests to determine language needs and written-translation priorities.

5.2 Factor two — frequency of contact

No current residential interpretation needs have been identified. Agency-wide records for fiscal year 2023–2024 show four Spanish-interpreter requests and no Spanish document-translation requests. The agency also recorded four sign-language-interpreter requests, addressed through its accessible-communication procedures.

Admissions, QIDPs, and Quality Improvement will record language needs and assistance requests for transportation, service entry, family communication, public participation, and complaints. These records will inform annual review.

5.3 Factor three — importance of services

Transportation enables residents to participate in activities and obtain services and supports. Language barriers could prevent a person from arranging a trip, understanding important instructions, or exercising complaint rights. Assistance must therefore be available at these contacts, even when requests are infrequent.

5.4 Factor four — resources

Language assistance resources include contracted interpreters, telephone interpretation, competent bilingual assistance, and translation services. Quality Improvement maintains current vendor contacts, access instructions, authorization arrangements, and cost information. Admissions and QIDPs coordinate individual assistance needs. Assistance is provided at no cost to the person requesting it.

6.0 Language assistance implementation

The Arc will provide timely language assistance at no cost to the person needing it. Alice coordinates transportation-related language access with Admissions, QIDPs, and home or program staff. Staff will ask the person's preferred language and communication method and may use I Speak cards to identify the language.

6.1 Interpretation and translation

Use competent interpreters and translators who can communicate accurately, understand relevant terminology, protect confidentiality, and avoid conflicts of interest. Being bilingual alone does not establish interpreting competence. Machine translation may assist initial communication but will not be the sole basis for vital notices, complaint decisions, or other consequential information without qualified review.

Staff arrange language assistance promptly, including for time-sensitive trips and complaints. Advance requests are encouraged when feasible; assistance is not refused solely because advance notice was not provided.

English and Spanish Title VI notices and complaint forms are included in Appendices A and B. The Arc makes its complaint procedure available in Spanish and provides additional translations based on the language analysis. Written translations receive qualified review before public use. Oral interpretation is available for other languages and for people who cannot effectively use written materials.

6.2 Notice and training

The Arc will advertise free language assistance on the Publications/Title VI webpage, in the public notice, at Admissions, and through home and program staff. Staff will offer assistance for surveys, planning meetings, complaints, and transportation arrangements. Existing orientation and annual LCCD training will include Title VI responsibilities, identification of language needs, obtaining competent assistance, documenting requests, and complaint referral.

6.3 Monitoring

Quality Improvement and the LCCD committee will review language needs and the effectiveness of assistance at least annually. Review will consider contact logs, participant feedback, service changes, updated demographics, staff training, vendor availability, costs, and complaints. Changes affecting the program will be documented and reviewed by the President and CEO.

6.4 Relationship of LCCD documents

The September 20, 2022 Board-approved LCCD Policy establishes the agency commitment. The January 2022 procedure assigns implementation responsibilities. The October 2024 LCCD Plan establishes agency-wide practices and resources. This Title VI Program applies those arrangements to Section 5310 transportation. Quality Improvement maintains adoption and annual-review records and current operating instructions.

7.0 Publication and program oversight

7.1 Publication and posting

Title VI information is available at https://arcqca.org/publications/. From the homepage, select Publications under About Us, then Civil Rights and Title VI. The webpage provides the public notice, complaint procedure, and English and Spanish complaint forms. Quality Improvement maintains current links and posting records.

Title VI notices are displayed at the administrative office, participating homes and program locations where transportation is arranged, and Section 5310 vehicles. Quality Improvement maintains dated posting records.

The full program is published following IDOT's confirmation under Finding 4621. Quality Improvement retains the submitted and published versions and related correspondence.

7.2 Subrecipients and contractors

The Arc does not pass Section 5310 assistance to other organizations and has no Section 5310 subrecipients. Applicable nondiscrimination obligations are included and administered in relevant contracts.

7.3 Facilities and service applicability

The Arc provides transportation arranged through home and program staff for residents. It does not operate a fixed-route public transit system. Before selecting a site for an applicable transportation facility, The Arc completes the required Title VI location and equity analysis and retains the supporting record.

7.4 Implementation record

Alice will maintain the final program, governing policies, complaint log, public-participation evidence, language analysis and assistance records, reviewed translations, staff-training records, posting evidence, and approval/IDOT correspondence. The President and CEO will review implementation and corrective actions with the Board as required by the governing policy.

7.5 Approval evidence

The agency retains the Board-approved Title VI Nondiscrimination Policy, approval minutes, and current Consolidated Vehicle Procurement Program resolution with this program. The President and CEO's dated signature documents agency approval of the program version identified on the cover.

Appendix A Public notice

Notice of rights under Title VI

The Arc of the Quad Cities Area operates its covered programs and services without discrimination based on race, color, or national origin. Any person who believes they have experienced such discrimination may file a Title VI complaint. Retaliation for filing a complaint or participating in an investigation is prohibited.

For information, a complaint form, or assistance filing a complaint, contact Alice Orsborn, Director of Quality Improvement, at 309-429-6075 or orsborna@arcqca.org; or write to The Arc of the Quad Cities Area, 4016 9th Street, Rock Island, IL 61201. Complaints may be submitted by email, mail, or hand delivery within 180 days of the alleged discrimination. Staff can assist in documenting an oral complaint.

Free language assistance and accessible formats are available upon request. Visit https://arcqca.org/publications/ for civil-rights information. You may also file directly with IDOT's Bureau of Civil Rights, Attn: Title VI Program Coordinator, 2300 South Dirksen Parkway, Room 317, Springfield, IL 62764; or FTA's Office of Civil Rights, Attn: Title VI Program Coordinator, 1200 New Jersey Avenue SE, Washington, DC 20590. You do not have to complete The Arc's process first.

Aviso de derechos conforme al Título VI

The Arc of the Quad Cities Area administra sus programas y servicios cubiertos sin discriminación por motivos de raza, color u origen nacional. Toda persona que considere haber sufrido dicha discriminación puede presentar una queja conforme al Título VI. Se prohíben las represalias por presentar una queja o participar en una investigación.

Para obtener información, un formulario o ayuda para presentar una queja, comuníquese con Alice Orsborn, Directora de Mejora de la Calidad, al 309-429-6075 o a orsborna@arcqca.org, o escriba a The Arc of the Quad Cities Area, 4016 9th Street, Rock Island, IL 61201. Puede presentar su queja por correo electrónico, correo postal o en persona dentro de los 180 días siguientes a la presunta discriminación. El personal puede ayudarle a poner por escrito una queja verbal.

Se ofrecen gratuitamente asistencia lingüística y formatos accesibles. Visite https://arcqca.org/publications/. También puede presentar una queja directamente ante IDOT, Bureau of Civil Rights, Attn: Title VI Program Coordinator, 2300 South Dirksen Parkway, Room 317, Springfield, IL 62764; o ante FTA, Office of Civil Rights, Attn: Title VI Program Coordinator, 1200 New Jersey Avenue SE, Washington, DC 20590. No tiene que completar primero el proceso de The Arc.

Appendix B Title VI complaint form

The Arc of the Quad Cities Area
Submit to Alice Orsborn, Director of Quality Improvement
4016 9th Street, Rock Island, IL 61201
orsborna@arcqca.org • 309-429-6075

Use this form or another written statement to report discrimination based on race, color, or national origin. File within 180 days of the alleged discrimination. Assistance, free interpretation, and accessible formats are available. Staff can help document an oral complaint. Email, mail, or hand delivery is accepted; a mailed original is not required after email submission.

Your name: _____

Address: _____

Phone: _____ Email: _____

Preferred language or assistance needed: _____

If filing for another person, their name and your relationship: _____

_____

Basis of complaint: Race ____ Color ____ National origin ____

Date and location of incident: _____

Describe what happened, why you believe it was discrimination, and who was involved. Include witnesses or documents if available. Attach additional pages as needed.

_____

_____

_____

_____

_____

Other agencies or courts where this matter was filed, if any: _____

_____

Signature or confirmed statement: _____ Date: _____
Staff assistance or confirmation method, if used: _____

For agency use: Date received _____ Received by _____
Log reference _____ Date forwarded to Alice _____

Appendix B continued Formulario de queja del Título VI

The Arc of the Quad Cities Area
Enviar a Alice Orsborn, Directora de Mejora de la Calidad
4016 9th Street, Rock Island, IL 61201
orsborna@arcqca.org • 309-429-6075

Utilice este formulario u otra declaración escrita para denunciar discriminación por raza, color u origen nacional. Presente la queja dentro de los 180 días siguientes a la presunta discriminación. Se ofrecen ayuda, interpretación gratuita y formatos accesibles. El personal puede ayudarle a poner por escrito una queja verbal. Puede enviarla por correo electrónico, correo postal o entregarla en persona. No se exige un original por correo después de enviarla por correo electrónico.

Su nombre: _____

Dirección: _____

Teléfono: _____ Correo electrónico: _____

Idioma preferido o ayuda necesaria: _____

Si presenta la queja por otra persona, indique su nombre y relación: _____

_____

Motivo de la queja: Raza ____ Color ____ Origen nacional ____

Fecha y lugar del incidente: _____

Describa lo ocurrido, por qué cree que hubo discriminación y quiénes participaron. Incluya testigos o documentos disponibles. Puede adjuntar más páginas.

_____

_____

_____

_____

Otras agencias o tribunales donde presentó esta queja: _____

_____

Firma o declaración confirmada: _____ Fecha: _____
Ayuda del personal o método de confirmación: _____