City of Richland Center

Title VI/Americans with Disabilities Act (ADA) Plan[1]

Revised on: August 18, 2020

Adopted by: City of Richland Center City Council

Adopted on: September 2, 2014

This policy is hereby adopted and signed by:

City of Richland Center

Executive Name/Title: Todd E. Coppernoll, Mayor

Executive Signature:

Policy Statement

The **City of Richland Center** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **City of Richland Center** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Title VI/ADA Plan Elements

The **City of Richland Center's** Title VI/ADA plan includes the following elements:

1. Evidence of Policy Approval, Log of Policy Updates, Contact Information/Program Administration
2. Notice of Nondiscrimination
3. Complaint Procedure
4. Complaint Form
5. List of transit related Complaints, Investigations and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

   Note: Additional materials will be attached, if required.

[1] **Title VI** of the Civil Rights Act of 1964 states "No person in the United Sates shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." – Title 42 USC Section 2000d

Title II of the Americans with Disabilities Act (ADA) protects individuals with disabilities from discrimination on the basis of disability in services, programs and activities provided by State and local government entities.

The **City of Richland Center** will review its policy on an annual basis to determine if modifications are necessary.

The **City of Richland Center** will use the table below to record reviews/revisions made to the plan.

As applicable, **City of Richland Center** will discuss Title VI/ADA plan requirements with its third-party transit provider, ***Running Inc.*** on an annual basis to ensure compliance with Title VI/ADA plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
Sept. 2, 2014	Develop City of Richland Center Title VI Plan	Melinda Jones	
July 29, 2020	Update City of Richland Center Title VI-ADA Plan per WisDOT requirement	Melinda Jones	

Contact Information/Program Administration

Chief Executive

The **City of Richland Center's** Chief Executive will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name:	Todd Coppernoll
Email:	Todd.coppernoll@richlandcenter.com
Phone:	608-647-6428

Transportation Manager

The **City of Richland Center's** Transportation Manager will ensure implementation of the **City of Richland Center's** federally funded transportation program. The Transportation Manager has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **City of Richland Center's** Chief Executive.

Name:	Todd Coppernoll
Email:	Todd.coppernoll@richlandcenter.com
Phone:	608-647-6428

Civil Rights Coordinator

The **City of Richland Center's** Civil Rights Coordinator ensures Title VI/ADA compliance in accordance with the **City of Richland Center's** federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/ADA compliance. This position has a direct reporting relationship and access to the **City of Richland Center's** Chief Executive.

Name:	Todd Coppernoll
Email	Todd.coppernoll@richlandcenter.com
Phone:	608-647-3466

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City of Richland Center's** nondiscrimination requirements, including the following activities:

- ✓ Program Administration
  - Ensure compliance with federal Title VI/ADA requirements
  - Develop and implement the **City of Richland Center's** Title VI/ADA Plan
  - Update and maintain Title VI/ADA program policies and procedures
- ✓ Complaints
  - Review, track, investigate and close Title VI/ADA complaints
- ✓ Employee Training
  - Educate staff on Title VI/ADA and requirements and procedures
- ✓ Reporting
  - Prepare and submit Title VI/ADA reports per state and federal regulations
- ✓ Public Dissemination
  - Notify the public of the **City of Richland Center's** Title VI/ADA program requirements via the **City of Richland Center's** public area, on its website, in vehicles, etc.
- ✓ Oversight
  - Ensure contractors and lessees adhere to Title VI/ADA requirements

Title VI/ADA - Notice of Nondiscrimination to the Public[2]

City of Richland Center's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

City of Richland Center

- ✓ The **City of Richland Center** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **City of Richland Center** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the **City of Richland Center**.
- ✓ For more information on the **City of Richland Center's** civil rights program, and the procedures to file a complaint, contact Melinda Jones at 608-647-3466 (for hearing impaired, please use Wisconsin Relay 711 service); email Melinda.jones@richlandcenter.com or visit the clerk/treasurer's office at 450 South Main Street, Richland Center, WI 53581. For more information, visit https://ci.richland-center.wi.us/
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 608-647-3466.
  Si se necesita informacion en otro idioma de contacto, 608-647-3466.
  Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-647-3466.

City of Richland Center's *Notice of Nondiscrimination* is posted in the following locations

- ✓ Agency website https://ci.richland-center.wi.us/
- ✓ Public areas – Municipal Building, Brewer Library, Senior/Community Center
- ✓ Inside vehicles

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[2] Title VI and ADA regulations require **City of Richland Center** to inform customers and the public of their rights under Title VI and ADA regulations by posting a *Notice of Nondiscrimination*. The public notice must include:

- ✓ A statement of nondiscrimination;
- ✓ Information on how to request additional information about the agency's Title VI and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc.;
- ✓ Information on how to request Title VI and ADA information in another language, if required.

The *Notice of Nondiscrimination* should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities

Complaint Procedure

The **City of Richland Center's** Complaint Procedure is made available in the following locations:

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Public areas – Municipal Building, Brewer Library and Senior/Community Center

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Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by the **City of Richland Center** may file a complaint by completing and submitting the **City of Richland Center's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City of Richland Center**.

The **City of Richland Center** investigates complaints received no more than 180 business days after the alleged incident. The **City of Richland Center** will process complaints that are complete.

Once the complaint is received, the **City of Richland Center** will review the complaint and work to resolve the complaint informally, if possible.

If the complaint warrants a formal civil rights complaint process, the **City of Richland Center** will follow the steps listed in this complaint procedure. The **City of Richland Center** may also use this formal procedure to address general complaints. If the **City of Richland Center** determines it has jurisdiction the complainant will receive an acknowledgement letter stating the complaint will be investigated by the **City of Richland Center** as a civil rights complaint.

The **City of Richland Center** has **30** business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **City of Richland Center** may contact the complainant.

The complainant has **30** business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within **30** business days, the **City of Richland Center** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two (2) letters will be issued to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI/ADA violation and that the case will be closed.
- ✓ A <u>letter of finding (LOF)</u> summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, the complainant has **30** business days after the date of the letter or the LOF to do so.

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

If information is needed in another language, then contact 608-647-3466.
Si se necesita informacion en otro idioma de contacto, 608-647-3466.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-647-3466.

City of Richland Center - Complaint/Comment Form

City of Richland Center is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at Melinda.jones@richlandcenter.com or in person at the address below.

City of Richland Center
450 South Main Street
Richland Center, WI 53581

You may also call us at 608-647-3466. Please make sure to provide your contact information in order to receive a response.

Section A: Accessible Format Requirements

Please check the preferred format for this document

☐ Large Print	☐ TDD or Relay	☐ Audio Recording	☐ Other (if selected please state what type of format you need in the box below)

Click or tap here to enter text.

Section B: Contact Information

Name Click or tap here to enter text.	Telephone Number (including area code) Click or tap here to enter text.
Address Click or tap here to enter text.	City Click or tap here to enter text.
State Click or tap here to enter text.	Zip Code Click or tap here to enter text.

Email Address Click or tap here to enter text.

Are you filing this complaint on your own behalf?	☐ Yes	☐ No

If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

Click or tap here to enter text.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	☐ Yes	☐ No

Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

☐ Complaint	☐ Suggestion	☐ Compliment	☐ Other

Which of the following describes the nature of the comment? Please check one or more of the check boxes.

☐ Race	☐ Color	☐ National Origin	☐ Religion
☐ Age	☐ Gender	☐ Service	☐ Income Status
☐ Limited English Proficient (L.E.P)		☐ Americans with Disability Act (A.D.A)	

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? *Please check any box that may apply.*	☐ Paratransit	☐ Shared Ride Taxi	☐ Bus
What was the date of the occurrence?	Click to add date in the following format: Day, month, year		
What was the time of the occurrence?	Click to add the time		
What is the name or identification of the employee or employees involved?	Click or tap here to enter text.		
What is the name or identification of others involved, if applicable?	Click or tap here to enter text.		
What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.		
What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.		
Where was the location of the occurrence?	Click or tap here to enter text.		
Was the use of a mobility aid involved in the incident?	☐ Yes	☐ No	
Please add any additional descriptive details about the incident.	Click or tap here to enter text.		

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.

Section E: Follow-up

May we contact you if we need more details or information?	☐ Yes	☐ No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

☐ Phone	☐ Email	☐ Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time	Click here to add your preferred day

Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the City of Richland Center.

Name Click or tap here to enter text. **Date:** Click or tap here to enter text.

Signature Click or tap here to enter text.

List of Complaints, Investigations and Lawsuits[3]

The **City of Richland Center** maintains a list or log to track and resolve all complaints, investigations and lawsuits, pertaining to its transit-related activities.

Check One:

_____ There have been no investigations, complaint and/or lawsuits filed against us during the report period.

_____ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

Type Complaint Investigation Lawsuit	**Date** (Month, Day, Year)	**Complainant's** Name/Address	**Basis of Complaint**[4]	**Summary** Complaint Description	**Status**	**Action(s) Taken**

[3] **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

[4] **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **City of Richland Center** will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The **City of Richland Center** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City of Richland Center** reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by the **City of Richland Center** are summarized in the table below. Efforts include *meetings, surveys, focus groups, attendance at community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e. posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

Event Date	**City of Richland Center** Staff	**Event**	**Date Publicized** and **Communication Method** (Public Notice, Posters, Social Media)	**Outreach Method** (Meeting, Focus Group, Survey, etc).	**Notes**
9/2/2014	Clerk	Council Meeting to approve Title VI	Web, Bulletin board-Public Notice 8/28/2014	Meeting	450 S. Main Street Council Chambers www.ci.richland-center.wi.us
8/18/2020	Clerk	Council Meeting to approve Title VI Update	Web, Bulletin board-Public Notice	Meeting in person And WebEx	450 S. Main Street Council Chambers www.ci.richland-center.wi.us
Ongoing	Staff, Volunteers	Presentations	As requested and as invited	Presentations to groups or at events	Varies

Event Date	City of Richland Center Staff	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
Quarterly or Semi-Annually – ongoing	Staff, Clerk, Volunteers	Council meeting presentations or review of Title VI along with Taxi Review	Web, Bulletin Board	Meeting And WebEx	Council Chambers www.ci.richland-center.wi.us

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **City of Richland Center** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **City of Richland Center's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **City of Richland Center** has conducted a *Four Factor Analysis*[5] of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP *Four Factor Analysis*

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

[5] DOT LEP guidance https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **City of Richland Center** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data[6]

The **City of Richland Center** did the following:

1. Inserted a copy of the **City of Richland Center's** county LEP data in the Title VI/ADA plan. This data was found at the WisDOT website https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx or the US Census Bureau American Fact Finder website http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml
2. Analyzed the LEP demographic data for the **City of Richland Center's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
    a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
        i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the **City of Richland Center** must provide translation of vital documents in written format for the non-English users. (Spanish = 81 persons or .005) (German = 33 persons or .002) Others are less than 10 persons. LEP Safe harbor threshold is less than 1%
        ii. Examples of written translation of vital documents include the Nondiscrimination policy statement (Appendix 2), Complaint Procedure (Appendix 3), Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*. The LEP data shows a total of 148 persons speak English less than Very Well out of the total 16,763 population in Richland County. The 148 equals .009 of the total population.

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) encounters LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP.

The summary below discusses the frequency with which **City of Richland Center** staff, and/or its contractor/lessee encounter LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **City of Richland Center** staff persons are encouraged to use LEP resource materials to assist LEP persons.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

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[6] The ACS publishes data in many forms on the Census Bureau American Fact Finder website http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml

The summary below discusses how the **City of Richland Center's** program and services impact the lives of persons within the community. The **City of Richland Center** will specify the community organizations that serve LEP persons, if available.

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the **City of Richland Center** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI/ADA and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, **the City of Richland Center** addresses the following elements:

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

City of Richland Center – Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1 – ***Demography***

The **City of Richland Center** contracts with ***Running, Inc.*** to provide shared-ride transportation service for the **City of Richland Center.**

The US Census Bureau – American Fact Finder (2011-2015) reports there are numerous languages spoken in **Richland County**. Some of these languages include Spanish, German, French, Russian, Chinese, Persian and Tagalog. After English, the second largest language group is Spanish.

Richland County LEP Data 2015 ...

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that "speaks English less then very well" by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **City of Richland Center** must provide translation of vital documents in written format for non-English speaking persons.

In **Richland County**, with a population estimate 16,763, 81 persons have identified themselves as Spanish speaking and "speaks English less than very well". This language group is less than 1% and below the 5% or 1,000 persons threshold of the population to be served. This means the **City of Richland Center** is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **City of Richland Center** is also not required to provide written translation of vital documents in these languages.

The **City of Richland Center** is below the Safe Harbor Threshold and is not required to provide written translation of vital documents. In the future, if the **City of Richland Center** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – ***Frequency***

The **City of Richland Center** and its transit provider, ***Running, Inc.*** trained on what to do when they encounter a person with limited English proficiency. The **City of Richland Center** with assistance from its transit provider, ***Running Inc.*** tracks the number of encounters and consider adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **City of Richland Center's** programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

Log of LEP Encounters

Date	Time	Language Spoken By Individual *(if available)*	Name and Phone Number of Individual *(if available)*	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

The **City of Richland Center's** transit provider, ***Running Inc.*** provides rides to 26,780 persons per year. While formal data has not been collected, ***Running Inc.*** has indicated it has encountered (0) LEP persons using the service within the last year.

The **City of Richland Center** staff has reviewed the frequency it has, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, **City of Richland Center** has 0 requests for interpreters and 0 requests for translated program documents.

The **City of Richland Center** and ***Running, Inc.*** have an open-door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the ***Running Inc.*** Transit Manager and the **City of Richland Center** to ensure the individual receives access to the transportation service.

The "I Speak" Language Identification Card listed below is a document that can be placed in our transit provider's vehicles and used by the **City of Richland Center** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **City of Richland Center's** service area.

"*I Speak*" Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Chinese
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Je parle francais	French
	من فارسی صحبت می کنم	Persian

Note: For additional languages visit the US Census Bureau website http://www.lep.gov/ISpeakCards2004.pdf

Factor 3 – ***Importance***

The **City of Richland Center** and our transit provider, ***Running, Inc.*** understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. A transportation system is a key link to connecting LEP persons to these essential services.

The **City of Richland Center** has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities and vehicles and providing information to the public on security awareness or emergency preparedness.

The **City of Richland Center's** assessment of critical needs includes contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – ***Resources and Costs***

Even though the **City of Richland Center** does not have a separate budget for LEP outreach, it continuously explores ways to implement low cost methods of notifying LEP persons of transportation services. Outreach/ resource efforts include posting website information, developing and printing brochure/materials and participating in public meetings to promote transportation services. Additional low-cost outreach methods to reach LEP communities include but are not limited to activities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The **City of Richland Center** works with ***Running, Inc.*** to ensure mechanisms are in place to reach LEP persons in the service area. When encountering LEP persons directly, **City of Richland Center** staff can use the "I Speak" Language Identification Card or posters to identify the language and communication need of LEP persons.

The **City of Richland Center** has a list of interpreters. The **City of Richland Center** has also developed relationships with language teachers in area schools as well as local community leaders to use as a resource to assist in meeting the need of LEP persons, if needed.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

The **City of Richland Center** and ***Running, Inc.*** does the following to inform LEP persons of the availability of language assistance services:

- ✓ Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed
- ✓ Utilize the bilingual speaking interpreters and local language teachers to assist with the development of bilingual outreach material
- ✓ Prioritize the hiring of bilingual staff, as needed
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs http://www.wisconsinrelay.com/ and http://www.wisconsinrelay.com/features

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

The **City of Richland Center** ensures Title VI-ADA requirements are met. The **City of Richland Center's** records updates and reviews to its Title VI-ADA plan in the *Policy Updates-Activity Log* section of the Title VI-ADA plan.

On an ongoing basis, the **City of Richland Center** assesses changes in demographics, types of services or other rider needs. This review assesses the efficacy of the LEP policies and procedures, including but not limited to mechanisms for securing interpretive services, equipment used for the delivery of language assistance, complaints filed by LEP person, needs identified through community outreach activities and routine feedback from direct-service staff.

The **City of Richland Center** will evaluate the information collected to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

City of Richland Center employees are oriented on the principles of Title VI/ADA and the **City of Richland Center's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.

The **City of Richland Center** will ensure its transit provider, ***Running, Inc.*** educates its staff on Title VI and ADA requirements, specifically complaint procedures and LEP provisions. If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with the **City of Richland Center's** and the ***Running, Inc.*** Transit Manager to identify necessary actions (immediate, short-term and long-term) designed to best meet the language needs of the participants of the program or service.

As part of our annual check in meeting with ***Running, Inc.***, the **City of Richland Center** will discuss the **City of Richland Center's** Title VI/ADA and Language Assistance Plan compliance requirements.

Minority Representation Information[7]

A. Minority Representation Table[8]

The table below depicts US Census county population data by race and the **City of Richland Center's** non-elected committees/councils related to transit.

Richland County Data by Race 2...

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Two or More Races
Richland County Population	95.2%	2.19%	.76%	.52%	.34%	.99%
City Council - Elected	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

The **City of Richland Center** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City of Richland Center** encourages participation of all its citizens.

As vacancies on boards, committees and councils become available, the **City of Richland Center** will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, the **City of Richland Center** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City of Richland Center** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

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[7] If the **City of Richland Center** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the **City of Richland Center**, Title VI regulations require the **City of Richland Center** to provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

[8] County data by race is available at the WisDOT website https://wisconsindot.gov/Documents/doing-bus/local-gov/astnce-pgms/transit/compliance/title6-race.pdf or the US Censure Bureau American Fact Finder website http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml

Minority Representation Data Collection Form[9]

Name of board, commission, council, etc.

Date:

Dear Member,

As the **City of Richland Center** is a recipient of federal funds, we are required under Title VI of the Civil Rights statue to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **City of Richland Center** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the **City of Richland Center**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI and ADA regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

___ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

___ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

___ *Hispanic:* All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

___ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

___ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

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[9] This form is an optional tool the **City of Richland Center** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI/ADA plan requirements.