

Title VI Plan

Village of Prairie du Sac

Adopted on: 11/11/2014

Adopted by: Village Board

01/09/2018

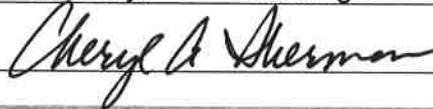
Revised on: _____

This policy is hereby adopted and signed by:

Village of Prairie du Sac

Executive Name/Title: Cheryl Sherman/Village President

Executive Signature: _____



Policy Statement

The **Village of Prairie du Sac** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Wisconsin Department of Transportation (WisDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

The **Village of Prairie du Sac's** Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

The **Village of Prairie du Sac** will review its policy at least once a year to determine if modifications are necessary. As applicable, the **Village of Prairie du Sac** will meet with its third-party contractor, **Running, Inc.** on an annual basis to ensure compliance with Title VI plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks

Title VI Notice to the Public

The **Village of Prairie du Sac's** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The Village of Prairie du Sac

- ✓ The **Village of Prairie du Sac** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **Village of Prairie du Sac**.
- ✓ For more information on the **Village of Prairie du Sac's** civil rights program, and the procedures to file a complaint, contact 608-643-2421, email pdsutilities@wppienergy.org, or visit Prairie du Sac Village Hall at 335 Galena Street Prairie du Sac, WI 53578 For more information, visit www.prairiedusac.net.
- ✓ 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 608-643-2421.
Si se necesita informacion en otro idioma de contacto, 608-643-2421.

The **Village of Prairie du Sac's** Notice to the Public is posted in the following locations:

- Agency website www.prairiedusac.net
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Inside vehicles of **Running, Inc.**

Title VI Complaint Procedure

The **Village of Prairie du Sac's** Title VI Complaint Procedure is made available in the following locations:
(check all that apply)

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **Village of Prairie du Sac** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

The **Village of Prairie du Sac** investigates complaints received no more than 180 days after the alleged incident. The **Village of Prairie du Sac** will process complaints that are complete.

Once the complaint is received, the **Village of Prairie du Sac** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Village of Prairie du Sac** has 10 days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has 10 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 10 business days, the village 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, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and 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, she/he has 10 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 608-643-2421.

Title VI Complaint Form

The **Village of Prairie du Sac's** Title VI Complaint Procedure is made available in the following locations:
(check all that apply)

- Agency website, either as a reference in the Notice to Public or in its entirety

Hard copy in the central office

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
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 III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				
If yes, check all that apply:				
<input type="checkbox"/> Federal Agency: _____				
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____				

<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below

Signature Date

Please submit this form in person at the address below, or mail this form to:

Village of Prairie du Sac, Title VI Coordinator
 335 Galena Street
 Prairie du Sac, WI 53578

List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Village of Prairie du Sac** maintains a list or log of all Title VI investigations, complaints 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.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Village of Prairie du Sac** 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 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 **Village of Prairie du Sac** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **Village of Prairie du Sac** 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 **Village of Prairie du Sac** 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	Village of Prairie du Sac Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
10/24/2017	Village Board	Budget Hearing	Newspaper on 10/19	Meeting	
Ongoing	Village Staff	General Public Info	Ongoing	Website	

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **Village of Prairie du Sac** 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 **Village of Prairie du Sac'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 **Village of Prairie du Sac** has conducted a *Four Factor Analysis*¹ 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.

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

US Census and American Community Survey (ACS) Data²

The **Village of Prairie du Sac** did the following:

1. Inserted a copy of the **Village of Prairie du Sac's** county LEP data in the Title VI plan. This data was found at the WisDOT website <http://www.dot.wisconsin.gov/localgov/docs/title6-lep.pdf> or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

¹ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

² 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>

2. Analyzed the LEP demographic data for the **Village of Prairie du Sac'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 **Village of Prairie du Sac** must provide translation of vital documents in written format for the non-English users.
 - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI 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*.

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) comes into contact with 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 **Village of Prairie du Sac** staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **Village of Prairie du Sac** 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.

The summary below discusses how the **Village of Prairie du Sac's** program and services impact the lives of persons within the community. The **Village of Prairie du Sac** 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 **Village of Prairie du Sac** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis* (listed below as item #1), the **Village of Prairie du Sac** 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
And, any additional information deemed necessary.

Village of Prairie du Sac – 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 **Village of Prairie du Sac** contracts with a transit provider, **Running, Inc.** provide transportation service for the **Village of Prairie du Sac** and in **Sauk City**.



Sauk County LEP
Data 2015 Esti...

The US Census Bureau – American Fact Finder (2011-2015) reports there are numerous languages spoken in USA County. Some of these languages include Spanish, German, Russian, Polish, Chinese, Korean, Vietnamese, Tagalog and Other Native North American languages. After English, the second largest language group is Spanish.

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. 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 **Village of Prairie du Sac** must provide translation of vital documents in written format for non-English speaking persons.

In Sauk County, with a population estimate of 59,078, 494 persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000 person threshold of the population to be served. This means the **Village of Prairie du Sac** is not required to provide written translation of vital documents. All of the other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **Village of Prairie du Sac** is also not required to provide written translation of vital documents in these languages.

In the future, if the **Village of Prairie du Sac** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Factor 2 – Frequency

The **Village of Prairie du Sac** and its transit provider, Running, Inc. will be trained on what to do when they encounter a person that speaks English less than well. The **Village of Prairie du Sac** with

assistance from **Running, Inc.** will track the number of encounters and make adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **Village of Prairie du Sac's** programs and services.

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 **Village of Prairie du Sac's** transit provider, **Running, Inc.** provides rides to 12000 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 six months.

The **Village of Prairie du Sac** and **Running, Inc** has 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 Transit Manager and the **Village of Prairie du Sac** 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 **Running, Inc's** vehicles and used by the **Village of Prairie du Sac** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **Village of Prairie du Sac's** service area.

"I Speak" Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
<input type="checkbox"/>	I speak English	English
<input type="checkbox"/>	Yo hablo español	Spanish
<input type="checkbox"/>	Kug has lug Moob	Hmong
<input type="checkbox"/>	我說中文	Chinese
<input type="checkbox"/>	E nói tiếng Việt	Vietnamese
<input type="checkbox"/>	나는한국어를	Korean
<input type="checkbox"/>	Marunong akong mag-Tagalog	Tagalog
<input type="checkbox"/>	Ich spreche Deutsch	German
<input type="checkbox"/>	Я говорю по-русски	Russian
<input type="checkbox"/>	Ja говорим српски	Serbian

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

Factor 3 – Importance

The **Village of Prairie du Sac** 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 **Village of Prairie du Sac** 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 **Village of Prairie du Sac's** assessment of the programs, activities and services that are most critical include 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 **Village of Prairie du Sac** does not have a separate budget for LEP outreach, the city has worked with our transit provider/lessee to implement low cost methods of reaching LEP persons.

Village of Prairie du Sac staff conducts outreach activities to LEP communities throughout the year to inform the public of transportation services available. These outreach/resource awareness efforts are low cost methods and are accomplished by existing staff resources and the use of posting website information and developing and printing brochure/materials.

Training of **Village of Prairie du Sac** and **Running, Inc.** staff as to Title VI and LEP requirements is conducted internally. At this point, no additional training costs have been incurred with the exception of printing/photocopying materials.

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

At this time, language assistance services has not been needed based on the limited encounters with LEP individuals. In the future, as the frequency of LEP encounters increase, the **Village of Prairie du Sac** will work with **Running, Inc.** to ensure mechanisms are in place to reach LEP persons in the service area. Examples of possible efforts included, working with language teachers in area high schools, community centers, churches and Sauk County government resources to seek ways to meet the language assistance needs of LEP community members.

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

The **Village of Prairie du Sac** 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
- ✓ Develop bilingual outreach materials, including pictograms and other symbols, as needed
- ✓ 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>

The **Village of Prairie du Sac** and **Running, Inc.** use a variety of low cost outreach methods 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 # 4 – Description of how the Language Assistance Plan is Monitored and Updated

The **Village of Prairie du Sac** reviews its plan on an annual basis or more frequently as needed. The **Village of Prairie du Sac** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

In addition, the **Village of Prairie du Sac** meets with its transit provider, **Running Inc.** on an annual basis to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on 11/11/2017.

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

Village of Prairie du Sac employees are oriented on the principles of Title VI and the **Village of Prairie du Sac's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The **Village of Prairie du Sac** will ensure its transit provider, **Running, Inc.** also educates its staff on Title VI requirements, and specifically LEP provisions.

If a driver, dispatcher or employee needs further assistance related to LEP individuals, her/she will work with the **Village of Prairie du Sac's** and/or **Running, Inc's** Transit Manager to identify strategies to meet the language needs of the participants of the program or service.

As part of our annual check in meeting, the **Village of Prairie du Sac** will meet with our transit provider, **Running, Inc.** to discuss updates the **Village of Prairie du Sac's** Language Assistance Plan.

Minority Representation Information

A. Minority Representation Table³

The table below depicts the **Village of Prairie du Sac's US Census** county population data by race.



Sauk County Data
by Race 2015 ...

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Sauk County Population	91.84%	4.7%	.52%	.74%	1.2%	1%
Village Board – (Members are elected)	100%					

B. Efforts to Encourage Minority Participation

The **Village of Prairie du Sac** does not have **non-elected** committees/councils related to transit.

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

As vacancies on boards, committees and councils become available, the **Village of Prairie du Sac** will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, the **Village of Prairie du Sac** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **Village of Prairie du Sac** will use create ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and providing transportation and child care, if needed for its members.

³ County data by race is available at the WisDOT website <http://www.dot.wisconsin.gov/localgov/transit/title6.htm> or the US Censure Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>