

Menominee Indian Tribe of Wisconsin (MITW)
Department of Transit Services

Title VI Plan¹

Revised on: May 19, 2021

Adopted by: Menominee Tribal Legislature

Adopted on: May 15, 2014

This policy is hereby adopted and signed by:

Menominee Indian Tribe of Wisconsin

Executive Name/Title: Gunnar Peters, Chairman

Executive Signature: 

Policy Statement

The Menominee Indian Tribe of Wisconsin (MITW), Department of Transit Services 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 MITW-Department of Transit Services in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Title VI/ADA Plan Elements

The MITW Department of Transit Services 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 States 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.

MITW Department of Transit Services will review its policy on an annual basis to determine if modifications are necessary. MITW Department of Transit Services will use the table below to record reviews/revisions made to the plan.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
May 19, 2021	Update Title VI-ADA Plan per WisDOT requirement	Richard Ducane	
May 15, 2014	Develop Title VI Plan	Shawn Klemens	

Contact Information/Program Administration

Chief Executive

MITW Department of Transit Services 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:	Gary Pyawasay
Email:	gpyawasay@mitw.org
Phone:	715-799-5264

Transportation Manager

MITW Department of Transit Services Transportation Manager will ensure implementation of **MITW Department of Transit Services** 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 **MITW Department of Transit Services** Chief Executive.

Name:	Richard Ducane
Email:	rducane@mitw.org
Phone:	715-799-7014

Civil Rights Coordinator

MITW Department of Transit Services Civil Rights Coordinator ensures Title VI/ADA compliance in accordance with **MITW Department of Transit Services'** 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 **MITW Department of Transit Services** Chief Executive.

Name:	Stacie Bowman
Email:	sbowman@mitw.org
Phone:	715-799-5188

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of nondiscrimination requirements, including the following activities:

- ✓ Program Administration
 - Ensure compliance with federal Title VI/ADA requirements
 - Develop and implement **MITW Department of Transit Services** 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 **MITW Department of Transit Services** Title VI/ADA program requirements via 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 Public²

MITW Department of Transit Services *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

MITW Department of Transit Services

- ✓ **MITW Department of Transit Services** 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 **MITW Department of Transit Services** 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 **MITW Department of Transit Services**.
- ✓ For more information on the **MITW Department of Transit Services** civil rights program, and the procedures to file a complaint, contact 715-799-3222, (for hearing impaired, please use Wisconsin Relay 711 service); email title.vi.complaint@mitw.org or visit our administrative office at W2727 Our Children's Road, Keshena, WI 54135. For more information, visit www.mitwbus.com
- ✓ 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 715-799-3222.
- ✓ Si se necesita informacion en otro idioma de contacto, 715-799-3222.

MITW Department of Transit Services *Notice of Nondiscrimination* is posted in the following locations

- ✓ Agency website www.mitwbus.com
- ✓ Public areas of the agency office (common area, public meeting rooms, etc.)
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules

² Title VI and ADA regulations require **MITW Department of Transit Services** 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 **MITW Department of Transit Services** Complaint Procedure is available in the following locations:

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
 - ✓ Public areas of the agency office (common area, public meeting rooms, etc.)
-

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 **MITW Department of Transit Services** may file a complaint by completing and submitting **MITW Department of Transit Services** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **MITW Department of Transit Services**.

MITW Department of Transit Services investigates complaints received no more than 180 business days after the alleged incident. **MITW Department of Transit Services** will process complaints that are complete.

Once the complaint is received, **MITW Department of Transit Services** will review the complaint and work to resolve the complaint informally, if possible.

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

MITW Department of Transit Services has fifteen (15) business days to investigate the civil rights complaint. If more information is needed to resolve the case, **MITW Department of Transit Services** may contact the complainant.

The complainant has ten (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 ten (10) business days, **MITW Department of Transit Services** 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 closure letter summarizes the allegations and states that there was not a Title VI/ADA 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, the complainant has five (5) 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 715-799-3222. Si se necesita informacion en otro idioma de contacto, 715-799-3222.

Complaint/Comment Form

MITW Department of Transit Services 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 title.vi.complaint@mitw.org or in person at the address below.

MITW - Department of Transit Services
W2727 Our Children's Road
P.O. Box 910
Keshena, WI 54135

You may also call us at 715-799-3222. 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

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section C: Type of Comment

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

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Gender	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> 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? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> 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?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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 MITW Department of Transit Services.

Name Click or tap here to enter text.

Date: Click to add date in the following format: Day, month, year

Signature Click or tap here to enter text.

List of Complaints, Investigations and Lawsuits³

MITW Department of Transit Services 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, **MITW Department of Transit Services** 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

MITW Department of Transit Services maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, **MITW Department of Transit Services** 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 **MITW Department of Transit Services** 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	MITW Staff Members Responsible	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
11/29/2017	1	2018 Menominee County 85.21 Public Hearing	11/17/17-Public Notice	Shawano Newspaper	2 attendees and no questions
12/1/2018	1	2018 Langlade County 85.21 Public Hearing	9/11/2017 & 9/13/2017-Public Notice	Antigo Newspaper	0 attendees

Event Date	MITW Staff Members Responsible	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
11/28/18	1	2019 Langlade County 85.21 Public Hearing	11/5/18-Public Notice	Antigo Daily Journal	2 attendees and 1 question
11/29/18	1	2019 Menominee County 85.21 Public Hearing	11/18/19-Public Notice	Shawano Leader	0 attendees
11/15/19	1	Menominee County 85.21 Public Hearing	10/30/19 – Public Notice	Shawano Leader	1 attendee and 0 questions
11/29/19	2	Langlade County 85.21 Public Hearing	10/29/19-Public Notice	Antigo Daily Journal	1 attendee and 0 questions

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **MITW Department of Transit Services** 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.

MITW Department of Transit Services 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 **MITW Department of Transit Services** 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.

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

US Census Data⁶

MITW Department of Transit Services did the following:

1. Inserted a copy of **MITW Department of Transit Services'** 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 **MITW Department of Transit Services'** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.

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

⁶ US Census data is available at <https://data.census.gov/cedsci/>

- 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) **MITW Department of Transit Services** must provide translation of vital documents in written format for the non-English users.
 - 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*.

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 **MITW Department of Transit Services** encounter LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **MITW Department of Transit Services** 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 **MITW Department of Transit Services’** program and services impact the lives of persons within the community. **MITW Department of Transit Services** 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 **MITW Department of Transit Services** uses to provide outreach to LEP persons as well as train staff on Title VI/ADA and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, **MITW Department of Transit Services** 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

MITW Department of Transit Services

Summary of the Language Assistance Plan Components

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

The MITW Department of Transit Services provides a demand response, fixed route public transit service. MITW Department of Transit Services provides transit service for the Menominee Indian Tribe of Wisconsin and is also the transit provider for Menominee County, Langlade County, Shawano County and a portion of services offered in the City of Shawano.

The US Census Bureau – American Fact Finder (2011-2015) reports there are numerous languages spoken in Menominee, Langlade and Shawano counties. Some of these languages include Other Native North American Languages (Menominee), Spanish, German, Russian, Polish, Hmong, Chinese, Laotian, Hindi, and Tagalog. After English, the largest language groups are Menominee and Spanish.



Menominee
County LEP Dat...



Langlade County
LEP Data 2015 ...

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 MITW Department of Transit Services must provide translation of vital documents in written format for non-English speaking persons.

- ✓ In *Menominee County*, with a population estimate of 4,040, 7 persons have identified themselves as speaking Other Native North American Languages (Menominee Language) and “speaks English less than very well” and 21 people are Spanish speaking and “speaks English less than very well”.
- ✓ In *Langlade County*, with a population estimate of 18,572, 67 persons have identified themselves as speaking Spanish and “speaks English less than very well”.
- ✓ In *Shawano County*, with a population estimate of 39,345, 251 persons have identified themselves as speaking Spanish and “speaks English less than very well”.

In all three counties, the two language groups - Other Native North American Languages and Spanish are less than 1% and below the 5% or 1,000 persons threshold of the population to be served. This means MITW Department of Transit Services is not required to provide written translation of vital documents in Menominee and Spanish. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, MITW Department of Transit Services is also not required to provide written translation of vital documents in these languages. Although not required to MITW Department of Transit Services does offer a translate option on its website.

In the future, if MITW Department of Transit Services 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

MITW Department of Transit Services staff are trained on what to do when they encounter a person with limited English proficiency. MITW Department of Transit Services 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 **MITW Department of Transit Services** 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

MITW Department of Transit Services provides rides to 200,000 persons per year. While formal data has not been collected, **MITW Department of Transit Services** has encountered no LEP persons using the service within the last year. This includes documenting phone inquiries or office visits. To date, **MITW Department of Transit Services** has no requests for interpreters and no requests for translated program documents.

MITW Department of Transit Services 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 Transportation Coordinator, Mobility Manager and/or Transportation Director 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 vehicles and used by **MITW Department of Transit Services** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **MITW Department of Transit Services** service area.

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	I speak English	English
	Nekiketim Omaeqnomeneweqnaesen	Menominee
	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
	Ja mówię po polsku	Polish
	मैं हिंदी बोलते हैं	Hindi

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

Factor 3 – Importance

MITW Department of Transit Services 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.

MITW Department of Transit Services 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.

MITW Department of Transit Services 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 **MITW Department of Transit Services** does not have a separate budget for LEP outreach, it will explore ways to implement low cost methods of notifying LEP persons of transportation services, as needed. Possible outreach/ resource efforts could include posting website information, developing and printing brochure/materials and participating in public meetings to promote transportation services.

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

MITW Department of Transit Services has had limited encounters LEP persons. However, when encountering LEP persons directly, **MITW Department of Transit Services** staff can use the “I Speak” Language Identification Card or posters to identify the language and communication need of LEP persons.

MITW Department of Transit Services will continue to work with its tribal and community leaders to ensure mechanisms are in place to reach LEP persons in its service areas.

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

MITW Department of Transit Services 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
- ✓ Reach out to tribal and community leaders when language assistance services are requested
- ✓ 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

MITW Department of Transit Services ensures Title VI-ADA requirements are met by reviewing and recording updates to its Title VI-ADA plan in the *Policy Updates-Activity Log* section of the Title VI-ADA plan.

On an ongoing basis, **MITW Department of Transit of Services** assesses changes in demographics, types of services or other rider needs. This review assesses the effectiveness 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.

MITW Department of Transit Services 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

MITW Department of Transit Services employees are oriented on the principles of Title VI/ADA and its Language Assistance Plan. New employees will be provided guidance on the needs of transit riders served and how best to meet their needs.

MITW Department of Transit Services will ensure its staff adhere to 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 **MITW Department of Transit Services** Transportation Coordinator, Mobility Manager or Transportation Director 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.

Minority Representation Information⁷

A. Minority Representation Table⁸

The table below depicts US Census county population data by race and **MITW Department of Transit Services'** non-elected committees/councils related to transit.



Menominee
County Data by ...



Langlade County
Data by Race 2...



Shawano County
Data by Race 20...

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Two or More Races
Menominee County Population	8.78%	5.9%	.48%	.44%	82.2%	2.2%
Langlade County Population	94.7%	1.86%	.95%	.28%	.76%	1.45%
Shawano County Population	87.1%	2.6%	.29%	.38%	7.3%	2.33%
Menominee Transportation Advisory Committee	30%	0%	0%	0%	70%	0%

B. Efforts to Encourage Minority Participation

MITW Department of Transit Services understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, **MITW Department of Transit Services** encourages participation of all its citizens.

The Menominee Transportation Advisory Committee provides direction regarding transit services delivered by **MITW Department of Transit Services** in Menominee County. **MITW Department of Transit Services** does attend meetings in Langlade and Shawano counties, but does not organize or chair the committees.

As vacancies on boards, committees and councils become available, **MITW Department of Transit Services** will make efforts to encourage and promote diversity.

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

⁷ If the **MITW Department of Transit Services** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the **MITW Department of Transit Services**, Title VI regulations require the **MITW Department of Transit Services** 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 Form⁹

Menominee Transportation Advisory Committee

Date:

Dear Member,

As **MITW Department of Transit Services** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute 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 **MITW Department of Transit Services** 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 **MITW Department of Transit Services**, 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.

⁹ This form is an optional tool **MITW Department of Transit Services** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI/ADA plan requirements.

Fixed Route Service Standards¹⁰

FTA requires all fixed route transit providers of public transportation to develop *quantitative* standards for vehicle load, vehicle headway, on-time performance and service availability. Individual public transportation providers set these standards; therefore, these standards apply to each individual agency rather than across the entire transit industry.

Vehicle Load¹¹

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 15' mini-bus, 51 passengers for low-floor 40-foot buses, 60 passengers for standard 40-foot buses, and 133 passengers on a light rail car.

Vehicle Headway¹²

Service operates on local and regional routes that range from 90 – 240 minutes or better from early morning to late in the evening, six days a week, Monday to Friday, service should begin no later than 5:00 a.m. and continue until 7:00 p.m. Saturday services should begin by 5:00 a.m. and continue until 1:00 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Menominee Regional Transportation Development Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-Time Performance¹³

A vehicle is considered on time if it departs Keshena no more than (30) thirty minutes early and not more than (30) thirty minutes late. **MITW Department of Transit Services'** on-time performance objective is 90% or greater. **MITW Department of Transit Services** continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability¹⁴

The **MITW Department of Transit Services** will distribute transit service so that 90% of all residents in the service area are within a ½ mile walk of bus service or within a ½ mile walk of bus service.

Local bus stops will not be more than one-quarter mile apart. Fixed bus stops will be one-half to three-quarters of a mile apart.

¹⁰ For guidance on how to set system-wide service standards and policies see FTA C 4702.1b, Title VI Requirements and Guidelines for FTA Recipients, Chapter IV-4, Section 4. Requirement to Set System-Wide Service Standards and Policies and Appendix G.

¹¹ **Vehicle Load:** Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. Transit providers can specify loads for peak. vs. off-peak times.

¹² **Vehicle Headway:** The amount of time between two vehicles traveling the same direction on a given route.

¹³ **On-Time Performance:** A measure of runs completed as scheduled.

¹⁴ **Service Availability:** A general measure of the distribution of routes within an agency's service area.

Fixed Route Service Policy¹⁵

FTA requires that all providers of fixed route public transportation develop *qualitative* policies for vehicle assignment and transit amenities. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

Vehicle Assignment Policy

Vehicles will be assigned such that the average age of the fleet serving each route does not exceed 12 years. Low-floor buses are deployed on frequent service and other high-ridership routes, so these busses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned minivans rather than 30 or 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

Transit Amenities Policy

Installation of transit amenities along bus routes are based on the number of passenger boardings at the stops along those routes.

¹⁵ For guidance on how to set system-wide service standards and policies see FTA C 4702.1b, Title VI Requirements and Guidelines for FTA Recipients, Chapter IV-4, Section 4. Requirement to Set System-Wide Service Standards and Policies and Appendix H.