

Title VI Plan

Dor-Tran, Inc. D.B.A Door-Tran

Revised on: Friday, October 5, 2018

Adopted by: Door-Tran Board of Directors

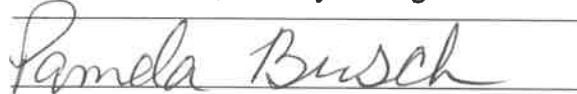
Adopted on: Thursday, March 20, 2014

This policy is hereby adopted and signed by:

Door-Tran

Executive Name/Title: Pamela Busch, Mobility Manager

Executive Signature:



Policy Statement

Door-Tran 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

Door-Trans' Title VI plan includes the following elements:

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

Note: Additional materials will be attached, if required.

Door-Tran will review its policy on an annual basis to determine if modifications are necessary. The table below tracks when review/updates are made to the Title VI plan.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
9/6/2018	Review and update plan per WisDOT requirement.	Pamela Busch	Changes reflect updated community outreach activities, US Census data, and best practices from WisDOT.
10/5/2018	Revised and submitted to WisDOT	Pamela Busch	Revision includes updated complaint forms and document formats/information

Title VI Notice to the Public

Door-Tran's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Door-Tran

- ✓ **Door-Tran** 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 **Door-Tran**.
- ✓ For more information on Door-Tran's civil rights program, and the procedures to file a complaint, contact 920-743-9999; email info@door-tran.org or visit our office at 1009 Egg Harbor Road, P.O. Box 181, Sturgeon Bay, WI 54235-0181.
- ✓ 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 920-743-9999.
Si se necesita informacion en otro idioma de contacto, 920-743-9999.

Door-Tran's Notice to the Public is posted in the following locations:

Agency website <https://door-tran.org/>

Public areas of the agency office (common area, public meeting rooms, etc.)

Inside vehicles, as applicable

Complaint Procedure

Door-Tran'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
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 **Door-Tran** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Door-Tran investigates complaints received no more than 180 days after the alleged incident. The **Door-Tran** will process complaints that are complete.

Once the complaint is received, **Door-Tran** 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.

Door-Tran has 30 days to investigate the complaint. If more information is needed to resolve the case, **Door-Tran** may contact the complainant.

The complainant has 15 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 15 business days, **Door-Tran** 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 30 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 920-743-9999
Si se necesita informacion en otro idioma de contacto, 920-743-9999.

Door-Tran - Complaint/Comment Form

Door-Tran'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
- Hard copy in the central office

Door-Tran 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 to info@door-tran.org or in person at the address below.

Door-Tran

1009 Egg Harbor Road, P.O Box 181
Sturgeon Bay, WI 54235-0181

You may also call 920-743-9999. Please provide your contact information to receive a response.

SECTION I: TYPE OF COMMENT (Choose One) – provide detail in ‘Comment Details’ below

Compliment	Suggestion	Complaint	Other
		Title VI: [] Race [] Color [] Nation Origin ADA (Disability): [] Yes [] No Service: [] Gender [] Religion [] Age Other: [] Limited English Proficient LEP	

SECTION II: CONTACT INFORMATION

Name:	
Rider ID (if applicable):	
Street Address:	
City, State, Zip code:	
Phone:	
Email:	

Accessible Format Requirements: (choose preferred format(s))	<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD/Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other
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Are you filing this complaint on your own behalf? If you answered "yes" to this question, go to Section IV. If not, please provide the name and relationship of the person for whom you are complaining: Please explain why you have filed for a third party:	Yes	No
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: COMMENT DETAILS

Transit Service (Choose one, as applicable) Bus/Paratransit/Shared-Ride Taxi	
Date & Time of Occurrence:	

Name/ID of Employee(s) or Others Involved:		
Vehicle ID/Route Name or Number:		
Direction of Travel:		
Location of Incident:		
Mobility Aid Used (if any):		
If above information is unknown, please provide other descriptive information to help identify the employee:		
Description of Incident: As applicable, explain as clearly as possible what happened and why you believe you were discriminated against. If more space is needed, please add additional pages.		
SECTION IV: FOLLOW-UP		
May we contact you for more details or information?	Yes	No
What is the best way to reach you? (choose one)	Phone	
If a phone call is preferred, what is the best day and time to reach you?	Email	
	Mail	
SECTION V: DESIRED OUTCOME		
What steps have you taken to address the conflict or problem?		
What type of corrective actions took place?		
What remedy are you seeking?		
SECTION VI: ADDITIONAL INFORMATION		
Have you previously filed a complaint with this agency?	Yes	No
Have you filed this complaint with any other Federal, State or Local agency, or with any Federal or State Court?	Yes	No
If yes, to the question above, list all agencies contacted:		
Please provide information about a contact person at the agency/court where each complaint was filed. Name, Agency, Address, Phone, Email		

Please attach any documents you have which support the allegation. Then date, sign and submit to **Door-Tran**.

_____ **Complainant Signature** _____ **Date**

Print Your Name

List of Transit Related Investigations, Complaints and Lawsuits

Door-Tran maintains a list or log of all Title VI/ADA 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, **Door-Tran** 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

Door-Tran maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, **Door-Tran** 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 **Door-Tran** 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	Door-Tran Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
4/24/18	All & BOD's	Annual Meeting	3/1-4/23/18 via mail and email to individuals and all media contacts	Meeting	Annual meeting averages 50 attendees each year
Monthly	Pam Bush or Nikki Voight	Door Community Nonprofit Group	E-invites monthly	Meeting	Average of 25 attendees per month, 40+ members
Quarterly	Pam Busch	NE WI Regional Transportation Committee	E-invites quarterly	Meeting	18 county membership
Monthly	Pam & Nikki	WI Assoc of Mobility Managers (WAMM)	E-invites, email, etc.	Meeting	Statewide membership
Monthly	Kim Gilson	Bay Area	E-invites, email, etc.	Meetings, trainings	Northeast WI Counties

Event Date	Door-Tran Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
		Managers of Volunteer Services (BAMVS)			
Monthly	Kim or Pam	Northern Door Health & Wellness Ministry	Email, social media	Monthly meetings	16 members from Northern Door churches, medical clinics and YMCA
Annually	Kim	WI Volunteer Coordinators Assoc (WVCA)	Email, E-Newsletters	Annual Conference	Statewide membership
Monthly	All	Marketing	Radio Bingo, Social Media Posts, e-newsletter, etc.	Marketing	At least 25% of Door County Residents reached in some form monthly
Ongoing	Staff, Board, Volunteers	Presentations	As requested and as invited	Presentations to groups or at events	Varies
Ongoing	Staff, Board, Volunteers	Community Events	Ongoing and methods vary	Event attendance with informational booth	Varies

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **Door-Tran** 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.

Door-Tran'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, **Door-Tran** 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 **Door-Tran** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data²

Door-Tran did the following:

1. Inserted a copy of **Door-Tran'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 **Door-Tran'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) **Door-Tran** 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 **Door-Tran** 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. **Door-Tran** 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 **Door-Tran's** program and services impact the lives of person's within the community. **Door-Tran** 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 **Door-Tran** 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), **Door-Tran** 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.

Door-Tran – 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

Door-Tran is a creative community network dedicated to connecting people with transportation services that are affordable, available and accessible in Door County.

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



Door County LEP
Data 2015 Esti...

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), **Door-Tran** must provide translation of vital documents in written format for non-English speaking persons.

In Door County, with a population estimate of 26,636, 133 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 **Door-Tran** is not required to provide written translation of vital documents. All the other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, **Door-Tran** is also not required to provide written translation of vital documents in these languages.

In the future, if **Door-Tran** 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

Door-Tran is trained on what to do when it encounters a person that speaks English less than well. **Door-Tran** tracks the number of encounters using the *Log of LEP Encounters* and will consider making adjustments to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **Door-Tran’s** programs and services.

Log of LEP Encounters

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

Door-Tran provides services and transportation to approximately 600 persons per year. While formal data has not been collected, Door-Tran has encountered less than (3) three LEP persons using the service within the last (4) four years.

Door-Tran has an open-door policy and will provide rides to any person who makes a request for service. If an individual has speech limitations, **Door-Tran** staff work with members of the Speech Translation team set-up through the County of Door, the Hispanic Resource Center and HOPE Church who have a group of volunteers who work with LEP persons to ensure the individual receives access to the transportation service.

The “I Speak” Language identification card listed below is a document that are to be placed in **Door-Tran** vehicles and used by **Door-Tran** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of **Door-Tran’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"/>	我說中文	Chinese
<input type="checkbox"/>	私は日本語を話します	Japanese
<input type="checkbox"/>	Kug hais lug Moob	Hmong
<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"/>	io parlo italiano	Italian
<input type="checkbox"/>	eu falo português	Portuguese

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

Factor 3 – Importance

Door-Tran 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.

Door-Tran 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.

Door-Tran's assessment of the programs, activities and services that are most critical include contact with community organization(s) as stated in **Factor 2** 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 **Door-Tran** does not have a separate budget for LEP outreach, **Door-Tran** has access to community partners who can assist on an as needed basis, at no cost. Community partners are informed of **Door-Tran's** services and many times refer LEP persons to **Door-Tran** and assist with the process.

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

Door-Tran is connected to community English as a Second Language agencies and volunteer programs as mentioned in **Factor 2** and **Factor 4**. In addition to those already listed, Door-Tran partners with the Division of Vocational Rehabilitation and the National Relay System to assist individuals how have hearing impairments.

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

A **Door-Tran** Mobility Manager attends monthly meetings of the Door Community Non-Profit Group, which has members of the Hispanic Resource Center (HRC). HRC informs LEP individuals who have transportation needs to **Door-Tran** to obtain services and assists Door-Staff and volunteers with verbal and written communications.

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

Door-Tran's original plan went into effect in March 2014 and will be reviewed annually to ensure the Title VI requirements are met.

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

As part of **Door-Tran's** annual review, **Door-Tran** will meet with staff, volunteers and community partners to discuss employee education on how to meet the needs of LEP populations. New employees and volunteers will be educated on the needs of clients served and how best to meet their needs.

Minority Representation Information

A. Minority Representation Table³

The following is US Census data by race for Door County.



Door County Data
by Race 2015 ...

The table below depicts **Door-Tran's** Board of Directors and Transportation Resource Improvement Partners (TRIP), previously known as the Consortium. The demographic data in the table below indicates the participation of minorities on the Board of Directors and TRIP.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Door County Population	94.8%	2.63%	.53%	.47%	.8%	.77%
Door Tran – Board of Directors (12 members)	100%	0%	0%	0%	0%	0%
TRIP = 56 members	96.5%	1.75%	0%	0%	0%	1.75%

B. Efforts to Encourage Minority Participation

Door-Tran understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, **Door-Tran** encourages participation of all its citizens.

As of September 2018, with the exception of the Board of Directors, almost all races residing in Door County were represented in TRIP. As vacancies on Door-Tran's board becomes available, Door-Tran will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, **Door-Tran** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, **Door-Tran** 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>

