

Door Tran

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

Title VI Nondiscrimination Plan

Revised on: December 7, 2022

Adopted by: Door-Tran Board of Directors

Original Title VI Plan

Adopted on: March 3, 2014
October 5, 2018
December 7, 2022

This plan is hereby adopted and signed by:

Door-Tran

Executive Name/Title: Nicole Voight, Executive Director

Executive Signature: _____

As a recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) Door-Tran is required to prepare a Title VI Nondiscrimination Plan including the following elements:

- Evidence of Policy Approval
- Policy Statement, Log of Policy Updates, Contact Information/Program Administration
- Notice of Nondiscrimination (**Appendix 1**)
- Complaint Procedure (**Appendix 2**)
- Complaint Form (**Appendix 3**)
- Recording and Reporting Civil Rights Investigations, Complaints and, and Lawsuits (**Appendix 4**)
- Public Involvement Plan (**Appendix 5**)
- Limited English Proficiency (LEP) Plan (**Appendix 6**)
- Demographic Representation Information (**Appendix 7**)
- Additional information, as required.

Policy Statement

Door-Tran is committed to ensuring that no person is excluded from the participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **Door-Tran** in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

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

Policy Updates – Activity Log

Door-Tran will review its policy on an annual basis to determine if modifications are necessary. The table below outlines the Title VI Plan reviews/revisions made by **Door-Tran**.

As applicable, **Door-Tran** will discuss Title VI Nondiscrimination Plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI Nondiscrimination requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
12/1/2022	Review and update outreach activities	Nikki Voight	
7/6/2020	Review plan and update outreach activities.	Nikki Voight	Becky Soderholm stated we're up to date and although changes made, we don't need to update.
10/2/2019	Review and updated outreach activities	Pamela Busch	
10/5/2018	Revised and submitted to WisDOT	Pamela Busch	Revision includes updated complaint forms and document formats/information
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.

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](#)

Contact Information/Program Administration

Chief Executive

Door-Tran's Chief Executive will ensure compliance with [Title VI of the Civil Rights Act of 1964 \(42 U.S.C. 2000d\)](#) and the U.S. Department of Transportation implementing regulations.

Name:	Nicole Voight
Email:	mobility@door-tran.org
Phone:	920-743-9999

Civil Rights Coordinator

Door-Tran's Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with **Door-Tran's** federally funded transportation activities. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/Nondiscrimination and LEP compliance. This position has a direct reporting relationship and access to **Door-Tran's** Chief Executive.

Name:	Nicole Voight
Email:	mobility@door-tran.org
Phone:	920-743-9999

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

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

Notice of Nondiscrimination

[FTA Title VI Circular 4702.1B](#) requires **Door-Tran** as a recipient of federal financial assistance to notify the public of its obligations under U.S. DOT Title VI regulations and the protections against discrimination afforded to them by Title VI.

Title VI regulations require **Door-Tran** to inform the public of their rights under Title VI by posting a *Notice of Nondiscrimination*. The *Notice of Nondiscrimination* should be posted in the following locations: agency website, public areas of the agency office, and as applicable, inside vehicles, rider guides/schedules, and transit shelters/facilities.

The public notice must include a statement of nondiscrimination, information on how to request additional information about the agency's Title VI obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI information in another language.

Door-Tran's *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website - door-tran.org
- ✓ Public area of the agency office (public meeting room)
- ✓ Inside vehicles, as applicable

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **Door-Tran** at 920-743-9999 if additional information is needed in another language.

To view a copy of **Door-Tran's** *Notice of Nondiscrimination*, please see **Appendix 1**.

Complaint Procedure and Complaint Form

Door-Tran, as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/Nondiscrimination and LEP complaints and make the procedures available to the public upon request.

Any person, group or firm that believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) by **Door-Tran** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **Door-Tran** activities. Adverse impacts resulting in civil rights complaints can arise from many sources including the delivery of programs and services, or advertising, bidding and contracts.

Complaints can originate as a result of project and program impacts on individuals or groups. Examples include social and economic impacts such as access to programs, activities and services, failure to maintain facilities and vehicles, traffic, noise, air quality, and accidents.

Complaints can also originate from individuals or firms alleging inability to bid upon or obtain a contract with **Door-Tran** for the furnishing of goods and services. Examples include advertising for bid proposals;

prequalification or qualification requirements; bid awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, etc.

Door-Tran's complaint procedure is shown in **Appendix 2** and made available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office – Hard copy central office

A copy of **Door-Tran's Complaint Form** is shown in **Appendix 3**.

Civil Rights Investigations

Recipients of federal financial assistance are required to maintain a list of any complaints alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status of the complaint, investigation, or lawsuit, actions taken by the recipient in response, and final findings related to the complaint, investigation, or lawsuit.

Appendix 4 is **Door-Tran's** procedure and tracking mechanism to investigate, track and resolve complaints.

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with **Door-Tran**.

Public Involvement Plan

Recipients of federal financial assistance are required to develop a public involvement plan that includes outreach strategies and participation techniques to engage the public including minority, low-income, and limited English proficient (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Nondiscrimination Plan.

While traditional means of seeking public involvement may not reach all individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

A copy of **Door-Tran's Public Involvement Plan** is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

As a recipient of federal USDOT funding, **Door-Tran** is required under [Title VI of the Civil Rights Act of 1964](#) and [Executive Order 13166](#) to develop and implement a plan to ensure accessibility to its programs and services for persons who are not proficient in the English Language.

A copy of **Door-Tran's Limited English Proficiency (LEP) Plan** is shown in **Appendix 6**.

The LEP plan outlines the policies and procedures **Door-Tran** will use to address the needs of persons with limited English proficiency (LEP) that wish to participate in **Door-Tran** programs and services.

Demographic Representation Information

Door-Tran understands that diverse representation on boards, councils, and committees help results in sound policy reflective of the needs of the entire population. [FTA Title VI Circular 4702.1B](#) requires recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, to report membership of these committees broken down by race and include a description of efforts made to encourage the participation of minorities on these committees.

A copy of **Door-Tran's Minority Representation Information** is shown in **Appendix 7**.

Title VI - Notice of Nondiscrimination to the Public

Door-Tran's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

Door-Tran

- ✓ **Door-Tran** is committed to ensuring that no person is excluded from the 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 **Door-Tran** 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 **Door-Tran**.
- ✓ For more information on **Door-Tran's** civil rights program, and the procedures to file a complaint, contact 920-743-9999; email mobility@door-tran.org or visit the office at 1009 Egg Harbor Road, P.O. Box 181, Sturgeon Bay, WI 54235-0181. For more information, visit door-tran.org
- ✓ A complaint may also be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590; Phone: 1-888-446-4511; Email: FTACivilRightsCommunications@dot.gov.
- ✓ If information is needed in another language, contact 920-743-9999.
Si se necesita informacion en otro idioma de contacto, 920-743-9999.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-743-9999.

Complaint Procedure

Door-Tran's Complaint Procedure is made available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
 - ✓ Agency office – Hard copy in the reception area
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Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by **Door-Tran** may file a complaint by completing and submitting **Door-Tran's** Complaint Form.

The Complaint Form may also be used to submit general complaints to **Door-Tran**.

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

Once the complaint is received, **Door-Tran** will review the complaint and work to resolve the complaint informally, if possible.

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

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

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, 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 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 **30** business days after the date of the closure 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 920-746-5982.

Si se necesita informacion en otro idioma de contacto, 920-746-5982.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-746-5982.

Complaint/Comment Form

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 at mobility@door-tran.org or in person at the address below.

Door-Tran
 Attn: Nikki Voight
 1009 Egg Harbor Road
 P.O. Box 181
 Sturgeon Bay, WI 54235

You may also call us at 920-743-9999. 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 <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>	Telephone Number (including area code) <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>
Address <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>	City <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>
State <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>	Zip Code <input style="width: 90%;" type="text" value="Click or tap here to enter text."/>
Email Address <input style="width: 90%;" type="text" value="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"/> Sex	<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"/> Volunteers	<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 Door-Tran.

Name

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

Signature

Appendix 4

List of Complaints, Investigations and Lawsuits²

The **Door-Tran** maintains a log to track and resolve transit related complaints, investigations, and lawsuits.

Check One:

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with **Door-Tran**.

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 ³	Summary Complaint Description	Status	Action Taken/ Final Outcome if Resolved

² **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

³ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Public Involvement Plan

The purpose of the **Public Involvement Plan** is to establish procedures that allow for, encourage, and monitor participation of all citizens within **Door-Tran** service area including but not limited to low income and minority individuals, and those with limited English proficiency (LEP).

While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

Goal

The goal of public involvement is to offer real opportunities for the engagement of all citizens within **Door-Tran** service area to participate in the development of plans, programs, and services.

Strategies

To promote inclusive public participation, **Door-Tran** uses the following strategies, as appropriate.

- Coordination and Consultation
 - Coordinate and consult with partners, stakeholders, program participants and their caregivers, and the public affected by the distribution of state and federal transit grant programs.
 - Seek guidance and input from WisDOT on public involvement mechanisms and strategies.
 - Maintain an electronic distribution list of all potential program participants, partners, stakeholders, etc.
- Accessibility and Information
 - Meetings
 - Adhere to state and federal public hearing requirements
 - Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
 - Hold meetings in locations which are accessible and reasonably welcoming to all area residents including, but not limited to, low-income and minority members of the public.
 - Employ different meeting sizes and formats
 - Provide avenues for two-way flow of information and input from populations which are not likely to attend meetings.
 - Make public information available in electronically accessible formats
 - 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.
- Timeliness
 - Provide timely information about state and federal grant programs to affected program participants, the public, partner agencies, and other interested parties.
 - Provide adequate notice of public involvement activities and time for public review and comment.
- Public Comment
 - Work openly and diligently to incorporate public comments received and to notify respondents of final plans, reports, programs, etc.
 - Provide for early, frequent and continuous engagement by the public
- Social/Environmental Justice
 - Seek and consider the needs of those traditionally underserved by participating in outreach efforts that address the needs of minority persons, the elderly, persons with disabilities, limited English Proficient individuals, and low-income households.
 - Determine what non-English languages and other cultural barriers exist to public participation within **Door-Tran** service area.
- Training
 - Participate in training to continuously improve the knowledge and understanding of civil rights and environmental justice principles.
- Evaluation
 - Document and maintain records of public outreach efforts.
 - Review the effectiveness of public participation activities.
 - Seek news ways to providing public input opportunities.

Participation Techniques

Door-Tran will use the following participation techniques as deemed appropriate. Participation techniques will be reviewed and modified each year, as necessary. If new techniques are tried and found to be successful, this list will be updated to include the new techniques.

- Booth at Community events (craft fair, festival, farmers market, parades, etc.)
- Advisory meetings and committees
- Direct mailings (letters, fliers, etc.)
- Website and social media
- Project-specific newsletter articles
- Public information meetings
- Legal advertisements
- Presentations to community partners, citizens/residents, etc.
- Press releases, meetings with local media representatives
- Surveys (telephone, internet, and public information meetings)
- Work with partner organizations

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 below. Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e., information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities					
Event Date	Door-Tran Staff Members	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
April of each Year	All & BOD's	Annual Meeting	Mar-Apr via mail and email to individuals and all media contacts	Meeting	Annual meeting averages 50 attendees each year
Monthly	Nikki Voight	Door Community Nonprofit Group	E-invites monthly	Meeting	Average of 25 attendees per month, 40+ members
Quarterly	Nikki Voight	NE WI Regional Transportation Committee	E-invites quarterly	Meeting	18 county membership
Monthly	Nikki Voight	WI Assoc of Mobility Managers (WAMM)	E-invites, email, etc.	Meeting	Statewide membership
Monthly	Kim Gilson	Bay Area Managers of Volunteer Services (BAMVS)	E-invites, email, etc.	Meetings, trainings	Northeast WI Counties
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
Quarterly	All TRIP Members	Meetings	Email, E-Newsletter, etc.	Quarterly Meetings	Varies, approx. 25
Bi-Monthly	Kim Gilson	Kewaunee Transportation Coordination Committee (TCC)	e-invites, bi-monthly	Bi-Monthly Meetings	18 members

Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, **Door-Tran** is required to prepare a Limited English Proficiency (LEP) Plan to address its responsibilities relating to the needs of individuals with limited English language skills.

This plan has been prepared in accordance with [Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq.](#), and its implementing regulations which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

[Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency”](#), issued in 2000 clarified Title VI of the Civil Rights Act of 1964. It stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI in order to access public services or benefits for which they are eligible. While most individuals in Wisconsin read, write, speak, and understand English, for some individuals English is not their primary language. If these individuals have a limited ability to read, write, speak or understand English, they are considered Limited English Proficient (LEP).

The US DOT “[Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons](#)” discusses the concept of “safe harbor” with respect to the requirements for translation of written materials. 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, of the population to be served) **Door-Tran** must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

Recipients of federal financial assistance are also required to implement LEP plans in accordance with guidelines of the federal agency from which the funds are provided. [FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients](#) provides guidance and instructions for LEP Plan development.

Plan Summary

Door-Tran has developed this *Limited English Proficiency Plan* to identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by **Door-Tran**.

This plan outlines how to identify a person who may need language assistance, how to inform LEP persons language assistance is available, the ways in which assistance may be provided, and staff training.

Plan Components

As a recipient of federal US DOT funding, **Door-Tran** is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

This 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 the following:
 - ✓ How language assistance services are provided.
 - ✓ How LEP persons are informed of the availability of language assistance services.
 - ✓ How the language assistance plan is monitored and updated.
 - ✓ How employees are trained to provide language assistance to LEP persons.

Meaningful Access - Four Factor Analysis

To prepare this plan, **Door-Tran** conducted a four-factor analysis which considers the following:

Factor 1 - Demography

Number and proportion of LEP persons who may be served or are likely to encounter a Door-Tran program or service.

This plan uses [US Census Bureau – American Fact Finder \(2011-2015\)](#) language data available by Wisconsin county. More data is available on the [US Census Bureau ACS website](#).



Door County LEP
Data 2015 Estimate.i

The US Census Bureau – American Fact Finder (2011-2015) data shows there are numerous languages spoken in Door-Tran. Some of these languages include Spanish, Chinese, Italian, Portuguese, German, Russian, Japanese, French, Polish, Hungarian, Greek, Yiddish, Other West Germanic Languages, and Other Slavic and Other Asian 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), **Door-Tran** must provide translation of vital documents in written format for non-English speaking persons.

In Door-Tran, 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 persons threshold of the population to be served. This means **Door-Tran** is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, **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 consider measures needed for oral interpretation.

Factor 2 – Frequency

Frequency of contact with LEP persons.

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

Door-Tran reviewed the frequency with which its staff, policy board, and contractors have, or could have, contact with LEP persons in the conduct of **Door-Tran** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. **Door-Tran** provides services and transportation to approximately 1,000 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 staff, policy board members, and contractor staff will be trained on what to do when they encounter a person with limited English proficiency.

Door-Tran with assistance from its contractor, tracks the number of encounters and considers adjustments to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of **Door-Tran’s** programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

Log of LEP Encounters

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

If a language barrier were to exist, **Door-Tran** would work to provide a reasonable accommodation. The *“I Speak” Language Identification Card* listed shown below is a document that can be used by **Door-Tran** staff to assist LEP individuals. Additional languages can be added, as needed, to match the demographic changes of the **Door-Tran’s** service area. The languages included in the *“I Speak” Language Identification Card* below represent many of the languages spoken within **Door-Tran** service area.

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	如果说中国在方框内打勾	Chinese
	Marchi questa casella se legge o parla italiano.	Italian
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	日本語を読んだり、話せる場合はここに印を付けてください。	Japanese
	Отметить этот флажок, если вы говорите по-русски	Russian
	Assinale este quadrado se você lê ou fala português.	Portuguese
	Cocher ici si vous lisez ou parlez le français.	French
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	Polish
	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	Slovak
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoic vaø noùi ñõõic Vieät Ngõõ.	Vietnamese
	당신이 한국어 말할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu
	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	Yiddish
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	Greek
	Jelölje meg ezt a kockát, ha megérte vagy beszéli a magyar nyelvet.	Hungarian

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

Factor 3 – Importance

Nature and importance of program to LEPs.

Door-Tran and our transit provider 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) 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

Resources available and overall cost to provide LEP assistance.

Given the small size of LEP encounters and small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request. **Door-Tran** will contact state and local units of government and community resources for assistance in translation services.

Even though **Door-Tran** does not have a separate budget for LEP outreach, it continuously explores ways to implement low-cost methods of notifying LEP persons of transportation services. Outreach efforts include maintaining a website, utilizing social media, developing and printing brochure/materials and having a visible presence in our community (e.g., participating in job fairs, parades, community events, etc.) to promote transportation services. Additional low-cost outreach methods to reach LEP communities include but are not limited to activities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

Language Assistance Services

Overview - Language Assistance Services

If a person does not speak English as their primary language and is LEP, that person may be entitled to language assistance with respect to **Door-Tran's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

Door-Tran will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

Door-Tran strives to offer the following measures when encountering LEP persons:

- ✓ Utilize the “*I Speak*” *Language Identification Card* or posters to identify the language and communication need of LEP persons.
- ✓ Maintain a *Log of LEP Encounters* to capture information on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Utilize translation services via the following:
 - Language Line Solutions – follow instructions on the SOP labeled ‘Language Line Solutions’
 - Hispanic Resource Center of Door and Kewaunee Counties
 - Destination Door County (Yvonne Torres)
 - HOPE Church
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>

- ✓ Utilize online resources such as Google Translate to assist with the translation of documents. The main downside of this approach is accuracy. As such, this option will be used by **Door-Tran** on limited basis. Instead, **Door-Tran** will seek assistance from fluent speakers.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Public Outreach – Informing LEP Persons of Language Assistance Services

Door-Tran uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts the Title VI/LEP *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact **Door-Tran** to request information in another language.
- ✓ When encountering LEP persons directly, **Door-Tran** will use the “*I Speak*” *Language Identification Card* to identify the language and communication needs of LEP persons. **Door-Tran** may not be able to immediately accommodate or assist individuals self-identifying as a person not proficient in English but will seek means to follow up with the individual to address their needs in the language requested as soon as possible. This card is laminated in the back office with a magnet clip for quick access.
- ✓ Review outreach activities and information gathered from the *Log of LEP Encounters* on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Develop and maintain cooperative relationships with key agencies/community organizations that serve LEP populations in the area or region. These entities can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs.
- ✓ Utilize translation services such as Language Line Solutions, Hispanic Resource Center of Door and Kewaunee Counties, Destination Door County and HOPE Church
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>

Monitoring, Evaluating and Updating the Plan

Door-Tran will review the LEP Plan on an annual basis. Review and updates will include the following:

- ✓ The number of documented LEP person contacts.
- ✓ How the needs of LEP persons have been addressed.
- ✓ Determine whether the need for translation services has changed.
- ✓ Determine with existing language assistance services are effective and sufficient to meet the needs of LEP persons.
- ✓ Determine whether complaints have been received concerning **Door-Tran’s** failure to meet the needs of LEP individuals.
- ✓ Sufficiency of staff training.
- ✓ Review of any new opportunities for LEP communication.
- ✓ Determine whether financial resources are needed to fund language assistance services.

Training Staff

The following training will be provided to **Door-Tran** staff:

- ✓ Information on **Door-Tran's** Title VI Non-Discrimination Plan and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Use of the "I-Speak Card" as a tool to assist LEP individuals.
- ✓ Documentation of language assistance requests using the *Log of LEP Encounters*.
- ✓ How to handle Title VI Non-Discrimination and LEP complaints.

Demographic Representation Information⁴

A. Demographic Representation Table⁵

The table below depicts US Census county population data by race and **Door-Tran’s** non-elected committees/councils related to transit.



Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Door County Population	94.83%	2.64%	.53%	.47%	.80%	.73%
Door Tran – Board of Directors (12 members)	100%	0%	0%	0%	0%	0%

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 vacancies on non-elected boards, committees and councils become 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 organizations to connect with all population groups in its service area. In addition, **Door-Tran** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

Door-Tran has a steering committee of approximately 60 agencies and community members who work to improve transportation services for all people in Door County to get where they need to go. Anyone is welcome to join this committee or attend these meetings. Every effort will be made to reach out to businesses or agencies who may be underserved to encourage inclusion and diversity.

⁴ If **Door-Tran** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by **Door-Tran**, Title VI regulations require **Door-Tran** 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.

⁵ 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 Census Bureau website <http://data.census.gov>

Demographic Representation Data Collection Form⁶

Name of board, commission, council, etc.

Date:

Dear Member,

The **Door-Tran**, as a recipient of federal funds is 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 **Door-Tran** 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 **Door-Tran**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI and LEP requirements. 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.

⁶ This form is an optional tool **Door-Tran** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI plan requirements.