

## TITLE VI Notice to the Public

The **County of Door**'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

**THE County of Door**

- ✓ The **County of Door** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **County of Door**.
- ✓ For more information on the **County of Door's** civil rights program, and the procedures to file a complaint, contact **920-746-7155**, (TTY **920-746-2372**); email [jkrebsbach@co.door.wi.us](mailto:jkrebsbach@co.door.wi.us) and indicate **Title VI complaint in the subject line**; or visit our administrative office at **Door County Government Center, 421 Nebraska Street, Sturgeon Bay, WI 54235**. For more information, visit [www.co.door.wi.gov](http://www.co.door.wi.gov)
- ✓ 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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact **920-746-7155**.  
*Si se necesita informacion en otro idioma de contacto, 920-746-7155.*

The **County of Door's** Notice to the Public is posted in the following locations: (*check all that apply*)

- X Agency website [[www.co.door.wi.gov](http://www.co.door.wi.gov)]
- X Public areas of the agency office (common area, public meeting rooms, etc.)
- X Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- X Other, **Door2DoorRides public transit website [[www.door2doorrides.com](http://www.door2doorrides.com)]**

## Title VI Complaint Procedure

The **County of Door**'s Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website **and Public Transit System website**, either as a reference in the Notice to Public or in its entirety
  - Hard copy in the central office
  - Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
  - Other, \_\_\_\_\_
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Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **County of Door (or any of its contracted providers in the Door County Public Transit System)** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

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

The **County of Door** has **60** days to investigate the complaint. If more information is needed to resolve the case, the **County of Door** may contact the complainant.

The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, the **County of Door** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, she/he has **10 calendar** 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 **920-746-7155**. *This statement should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.*

## Title VI Complaint Form

The **County of Door's** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website **and Public Transit System website**, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, \_\_\_\_\_

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



## County of Door – Summary of the Language Assistance Plan Components

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

### Factor 1 – Demography

The **County of Door** contracts with *two private* transit providers to provide shared-ride taxi (SRT) service. The contractors/transit providers provide service for the **County of Door**.

Census 2010 reports a *total county population of 27,785*. The American Community Survey (ACS) reports a population estimate of *26,621 persons 5 years of age and over*. The **County of Door** is below the Safe Harbor threshold. The largest LEP population is Spanish or Spanish Creole, which represents *(251 persons) or .90 %* of the population. Spanish or Spanish Creole speakers make up *(596 persons) or 2.15 %* of the total population. *German* LEP speakers make up *(173 persons) or .62 %* of the population.

The **County of Door** is below the safe harbor threshold and is not required to provide written translation of vital documents. *The Title VI notice provides a contact number to request assistance, if needed in a language other than English.*

*Even though the County of Door's population declined slightly in the 2010 census, our proportion of English speakers has stayed consistently above 95 %. In the 2010 census, the County of Door was determined to have 95.67 % English speakers.*

In the future, if the **County of Door** meets the Safe Harbor Threshold for written translation of vital documents, it will also consider measures needed for oral interpretation.

### Factor 2 – Frequency

The **County of Door** (and its contractor/lessee, if relevant) will be trained on what to do when they encounter a person that speaks English less than well. The **County of Door** and/or its contractor/lessee will track the number of encounters and consider making adjustments as needed to outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **County of Door's** programs and services.

The **County of Door's** contractor/transit provider provides rides to *> 34,000* persons per year. While formal data has not been collected, the contractors / *transit providers* have indicated it has encountered *< 3 (three)* LEP persons using the service within the last six months. Our contractors/transit providers have an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the **County of Door**, if needed to ensure the individual receives access to the transit service.

### Factor 3 – Importance

The **County of Door** and our contractors/transit providers understand *that* an LEP person with language barriers / challenges also faces difficulties obtaining health care, education or access to employment. A public transit system is a key link to connecting LEP persons to these essential services.

The **County of Door** 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, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

The **County of Door**'s assessment of what programs, activities and services that are most critical included 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. In the case of the **County of Door**, the Department of Human Services acts as the WisDOT subrecipient for public transit services. Many of these individuals first come to our attention when they apply for various forms of public assistance, public benefits, or emergency assistance through the Department of Human Services.

#### **Factor 4 – Resources and Costs**

Even though the **County of Door** does not have a separate budget for LEP outreach, the city has worked with our contractors/transit providers to implement low cost methods of reaching LEP persons. To aid in this effort, the Department of Human Services maintains ongoing contracts with two Spanish speaking interpreters for both our own and public transit riders. In addition, we employ one full time bilingual English / Spanish speaker in our Economic Support Unit – who can be called into service anywhere in our service array in Human Services, when needed for translation purposes. We also have arrangements in place with a nearby private college to arrange translation services for less frequently encountered languages, when that happens. Given the very tiny LEP population in Door County, these measures have proven to be adequate for meeting the needs of our LEP program users.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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As noted above in our demographics section, the **County of Door** is primarily English speaking with less than 5% non-English speaking residents. We do have one full time bilingual English / Spanish speaker on the staff of our Economic Support Unit – which deals heavily with public financial benefits available to residents. This is often the entry point at which they can be informed of other services available to them, including public transit.

Once past the Spanish speaking LEP group, the proportion of the remaining individual language groups are all well under 1% of the population each.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service
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Our Title VI notice includes a contact number if language assistance with transit is needed; and the reference line itself is written in Spanish.

Otherwise, all drivers of transit vehicles and all dispatch personnel do their best to communicate with potential public transit riders that the service is open to all. All public transit fares are clearly posted and all handled as simple, flat fares; so they are relatively easy to figure out for persons who have some LEP issues. If language does appear to be a barrier, then drivers and dispatchers have been instructed to contact Door County Department of Human Services to request translation assistance.

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

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

In addition, if relevant, the **County of Door** will meet with its contractors/transit providers on an annual basis to ensure the Title VI requirements are met. The last **contact with** the contractors/transit providers occurred on or about May 01, 2014 when they were informed of the Title VI revised plan for 2014 – 2017 was being submitted.

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

**County of Door (and contracted transit provider)** employees are educated on the principles of Title VI and the **County of Door's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. An important discussion point is that of language assistance. If a driver, dispatcher or employee needs further assistance related to LEP program participants, her/she will work with the **County of Door's** Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.

As part of our annual check in meeting, if relevant, the **County of Door** will meet with its contractors/transit providers to discuss updates to the **County of Door's** Language Assistance Plan.