

Title VI Notice to the Public

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

Notifying the Public of Rights Under Title VI

DOOR COUNTY

- ✓ DOOR COUNTY 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 **DOOR COUNTY'S** civil rights program, and the procedures to file a complaint, contact 920-746-5982, (TTY 855-828-2372); email pbusch@co.door.wi.us; or visit the Transportation Department at the ADRC, 916 N 14th Avenue, Sturgeon Bay, WI 54235. For more information, visit 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 920-746-5982.
Si se necesita informacion en otro idioma de contacto, 920-746-5982.

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

- X County website [<http://www.co.door.wi.gov/docview.asp?docid=16219&locid=137>]
- X Public areas of the agency office (common area, public meeting rooms, etc.)
- X Inside vehicles (Door 2 Door Rides and ADRC)
- X Other, Door2DoorRides public transit website [www.door2doorrides.com]

Title VI Complaint Procedure

Door County's Title VI Complaint Procedure is made available in the following locations:

- X Agency website, and Public Transit System website, either as a reference in the Notice to Public or in its entirety
 - X Hard copy in the Transportation Department
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Any person who believes they've been discriminated against on the basis of race, color, or national origin by **Door County (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. **Door County** investigates complaints received no more than 180 days after the alleged incident. **Door County** will process complaints that are complete.

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

Door County has 30 days to investigate the complaint. If more information is needed to resolve the case, the county 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, **Door County** 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, the complainant has 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 920-746-5982.
Si se necesita informacion en otro idioma de contacto, 920-746-5982.

Door County- Complaint/Comment Form

Door County 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 pbusch@co.door.wi.us or in person at the address below.

Door County Transportation Dept.
 Attn: Pam Busch
 916 N 14th Avenue
 Sturgeon Bay WI 54235

You may also call us at 920-746-5982 Please make sure to provide your contact information in order to receive a response.

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

Compliment	Suggestion	Complaint	Other
		Title VI: ADA (Disability): Service: Other:	
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Gender <input type="checkbox"/> Religion <input type="checkbox"/> Age <input type="checkbox"/> 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))	Large Print	TDD/Relay	Audio Recording	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.	Yes	No
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:		
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 of Occurrence:	
Time of Occurrence:	

Door County– Summary of the Language Assistance Plan Components

Plan Components

As a recipient of federal US DOT funding, **Door County** 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 County's Language Assistance Plan includes the following elements:

1. 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

Item # 1 – Description of how Language Assistance Services are Provided, by Language
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Factor 1 – Demography

Door County contracts with two private transit providers, Abby Vans, Inc. and Sunshine House, Inc., to provide shared-ride taxi (SRT) service 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, 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 County** must provide translation of vital documents in written format for non-English speaking persons.



Door County LEP
Data 2015 Estimate.j

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 persons threshold of the population to be served. This means **Door County** 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 County** is also not required to provide written translation of vital documents in these languages.

Although **Door County** 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.

In the future, if **Door County** 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 County and its transit providers will be trained on what to do when they encounter a person that speaks English less than well. **Door County** with assistance from our transit providers will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of **Door County's** programs and services.

Log of LEP Encounters

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

Door County's transit providers provide rides to >40,000 persons per year. While formal data has not been collected, Abby Vans indicated they have encountered (2) two LEP person(s) using the service within the last year. One Spanish and one Chinese speaking.

Door County and our 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 **Door County** 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 transit providers' vehicles and used by **Door County** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of **Door County's** 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 oã naøy neáu quyù vò bieát ñoïc vaø noui ñoõic Vieät Ngõõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	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 megérti 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

Door County and our transit providers understand 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 County 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 County'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. In the case of **Door County**, the Department of Human Services acts as the WisDOT sub-recipient 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 **Door County** does not have a separate budget for LEP outreach, the county has worked with our transit providers to implement low cost methods of reaching LEP persons. **Door County** has ongoing contracts with two Spanish speaking interpreters for both our own and public transit riders. We also utilize "Language Line", a telephone translation service, and a nearby private college which assists us with translation services for less frequently encountered languages when they occur. In addition to those, we work with our transit providers to ensure mechanisms are in place to reach LEP persons in the service area.

Training of **Door County** and our transit providers' staff as to Title VI and LEP requirements is conducted internally. Given that **Door County** has such a small LEP population, these measures have proven to be adequate for meeting the needs of our LEP program users at this time.

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

As noted above, in the demographics section, **Door County** is primarily English speaking with less than 5% of residents non-English speaking.

Door County has ongoing contracts with two Spanish speaking interpreters for both our own and public transit riders. We also utilize “Language Line”, a telephone translation service, and a nearby private college which assists us with translation services for less frequently encountered languages when they occur. In addition, we work with our transit providers to ensure mechanisms are in place to reach LEP persons in the service area.

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

Door County and our transit providers do 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
- ✓ Utilize the services of contracted translation services.
- ✓ Utilize “Language Line” telephone translation service.
- ✓ Utilize a nearby private college to assist with any needed translation services.
- ✓ 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>

Door County’s Title VI notice includes a contact number, if language assistance with transit is needed, and the reference line itself is written in Spanish. All drivers of transit vehicles and all dispatch personnel do their best to communicate with potential public transit riders since the service is open to all. All public transit fares are clearly posted and all handled as simple, flat fares; so that 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

Door County, and our transit providers, employees are educated on the principles of Title VI and **Door County’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, he/she will work with **Door County’s** Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.

Door County reviews its plan on an annual basis or more frequently as needed. In particular, **Door County** 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, **Door County** meets with our transit providers on an annual basis to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on 12/12/19.

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

Door County employees are oriented on the principles of Title VI and **Door County's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. **Door County** will ensure its transit providers also educates its staff on Title VI requirements, and specifically LEP provisions.

If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with **Door County's** and/or our transit provider's Transit Manager to identify strategies to meet the language needs of the participants of the program or service.

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

Minority Representation Information

A. Minority Representation Table³



Door County Data
by Race 2015 Estima

The table below depicts **Door County's** committees/councils related to transit.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Door County Population 27,731	94.83%	2.64%	.53%	.47%	.80%	.73%
Administrative Committee (public) 7 members	100%	0%	0%	0%	0%	0%
Door – Tran Board (private) 12 members	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

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

As vacancies on boards, committees and councils become available, **Door County** will make efforts to encourage and promote diversity. To encourage participation, **Door County** will continue to reach out to community, ethnic and faith-based organizations to connect with all population. In addition, **Door County** will use creative 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>

