

# City of Prairie du Chien, Wisconsin

## Title VI Nondiscrimination Plan

**Revised on:** May 18, 2021

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**Adopted by:** Common Council of the City of Prairie du Chien

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Original Title VI Plan

**Adopted on:** April 24, 2014

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*This plan is hereby adopted and signed by:*

### **City of Prairie du Chien**

**Executive Name/Title:** Chad Abram, City Administrator

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**Executive Signature:** *Chad Abram*

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As a recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) the **City of Prairie du Chien** 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**) (Supporting Census data are included in **Appendix 8**)
- Demographic Representation Information (**Appendix 7**) (Supporting Census data are included in **Appendix 8**)

*The Mississippi River Regional Planning Commission Title VI Regional Transportation Plan is attached for reference.*

## **POLICY STATEMENT**

The **City of Prairie du Chien** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **City of Prairie du Chien** in accordance with Title VI of the Civil Rights Act of 1964<sup>1</sup> and related nondiscrimination authorities.

The **City of Prairie du Chien** receives federal financial assistance to provide shared-ride taxi service within the **City of Prairie du Chien** and approximately 2 miles beyond the border of the municipality, and the Common Council of the **City of Prairie du Chien** provides oversight and is the responsible party for managing the system. Information on the Shared Ride Taxi service is available at <https://runninginc.net/coulee-cab/>

## **POLICY UPDATES – ACTIVITY LOG**

The **City of Prairie du Chien** will review its policy on an annual basis to determine if modifications are necessary. The **City of Prairie du Chien** will use the following table to record reviews/revisions made to the plan.

As applicable, **City of Prairie du Chien** will discuss Title VI Nondiscrimination Plan requirements with its third-party transit provider, **Running, Inc.** on an annual basis to ensure compliance with Title VI Nondiscrimination requirements.

<b>Date</b>	<b>Activity (Review/Update/Addendum/ Adoption/Distribution)</b>	<b>Person Responsible</b>	<b>Notes</b>
May 7, 2021	Updated Title VI Plan per WisDOT requirement. Revisions included	Garth Frable	

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<sup>1</sup> **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](#)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
	updated Complaint Form, updated LEP Plan and Minority Representation Information with current US Census data		
April 22, 2014	Develop Title VI Plan	Barb Elvert	

## **CONTACT INFORMATION/PROGRAM ADMINISTRATION**

### **Chief Executive**

The **City of Prairie du Chien'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.

<b>Name:</b>	Chad Abram
<b>Email:</b>	cabram@prairieduchien-wi.gov
<b>Phone:</b>	(608) 326-6406

### **Civil Rights Coordinator**

The **City of Prairie du Chien's** Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with the **City'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 the **City's** Chief Executive.

<b>Name:</b>	Tina Fuller
<b>Email:</b>	tfuller@prairieduchien-wi.gov
<b>Phone:</b>	(608) 326-6406

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City of Prairie du Chien's** nondiscrimination requirements, including the following activities:

✓ Program Administration

- Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
- Develop and implement the **City of Prairie du Chien'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 the **City of Prairie du Chien's** Nondiscrimination requirements via the **City'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 the **City of Prairie du Chien** 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 **City** 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.

The **City of Prairie du Chien's** *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website: <http://www.cityofpdc.com/> and third-party contractor website: <https://runninginc.net/coulee-cab/>
- ✓ Public area of the agency office: Lobby, City Hall, 214 E Blackhawk Ave; Prairie du Chien, WI 53821
- ✓ Inside transit vehicles
- ✓ Rider Guides/Schedules
- ✓ Transit Shelters and stations

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **City of Prairie du Chien** at (608) 326-6406 if additional information is needed in another language.

To view a copy of the **City's** *Notice of Nondiscrimination*, please see **Appendix 1**.

## **COMPLAINT PROCEDURE AND COMPLAINT FORM**

The **City of Prairie du Chien**, 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 the **City** may file a civil rights complaint.

### **Scope of Civil Rights Complaints**

The scope of civil rights complaints covers all internal and external **City of Prairie du Chien's** 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 **City of Prairie du Chien** 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.

The **City of Prairie du Chien'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: City Hall, 214 East Blackhawk Avenue; Prairie du Chien, WI 53821

A copy of the **City of Prairie du Chien'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 the **City of Prairie du Chien'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 the **City of Prairie du Chien**.

## **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 the **City's** *Public Involvement Plan* is shown in **Appendix 5**.

## **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

As a recipient of federal USDOT funding, the **City of Prairie du Chien** 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 the **City of Prairie du Chien's** *Limited English Proficiency (LEP) Plan* is shown in **Appendix 6**.

The LEP plan outlines the policies and procedures the **City of Prairie du Chien** will use to address the needs of persons with limited English proficiency (LEP) that wish to participate in **City's** programs and services.

## **DEMOGRAPHIC REPRESENTATION INFORMATION**

The **City of Prairie du Chien** 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 any recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, **that the** membership of these committees must be broken down by race and accompanied by a description of efforts made to encourage the participation of minorities on these committees.

A copy of the **City's** *Minority Representation Information* is shown in **Appendix 7**.



## **Appendix 1**

### **Title VI - Notice of Nondiscrimination to the Public**

**City of Prairie du Chien's** *Notice of Nondiscrimination* is as follows:

#### **Notice of Nondiscrimination**

##### **City of Prairie du Chien**

- ✓ The **City of Prairie du Chien** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **City of Prairie du Chien** 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 the **City of Prairie du Chien**.
- ✓ For more information on the **City of Prairie du Chien's** civil rights program, and the procedures to file a complaint, contact (608) 326-6406, (for hearing impaired, please use Wisconsin Relay 711 service); email [tfuller@prairieduchien-wi.gov](mailto:tfuller@prairieduchien-wi.gov); or visit our administrative office at 214 E Blackhawk Ave; Prairie du Chien, WI 53821. For more information, visit <http://www.cityofpdc.com/>.
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact (608) 326-6406.  
Si se necesita informacion en otro idioma de contacto, (608) 326-6406.  
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau (608) 326-6406.

## **Appendix 2**

### **Complaint Procedure**

The **City of Prairie du Chien'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: City Hall, 214 East Blackhawk Avenue; Prairie du Chien, WI 53821

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 the **City of Prairie du Chien** may file a complaint by completing and submitting the **City's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City**.

The **City of Prairie du Chien** investigates complaints received no more than 180 calendar days after the alleged incident. The **City** will process complaints that are complete.

Once the complaint is received, the **City of Prairie du Chien** will review the complaint and work to resolve the complaint informally, if possible.

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

The **City of Prairie du Chien** has **30** business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **City** may contact the complainant.

The complainant has **14** 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 **14** business days, the **City of Prairie du Chien** 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 **14** business days after the date of the letter or the LOF to do so.

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

If information is needed in another language, then contact (608) 326-6406.

Si se necesita informacion en otro idioma de contacto, (608) 326-6406.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau (608) 326-6406.

# **Complaint/Comment Form**

**City of Prairie du Chien** 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 [tfuller@prairieduchien-wi.gov](mailto:tfuller@prairieduchien-wi.gov) or in person at the address below.

**City of Prairie du Chien**  
**214 East Blackhawk Avenue**  
**Prairie du Chien, WI 53821**

You may also call us at (608) 326-6406. 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 type="text"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>

Email Address

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.

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"/> 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.		

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**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.

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## **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

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## **Section F: Desired Outcome**

**Please list below, what steps you would like taken to address the conflict or problem.**

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Click or tap here to enter text.

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**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.**

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Click or tap here to enter text.

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## **Section G: Signature**

**Please attach any documents you have which support the allegation. Then date and sign this form and send it to the City of Prairie du Chien.**

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Name Click or tap here to enter text.

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

Signature Click or tap here to enter text.

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## Appendix 4

### List of Complaints, Investigations and Lawsuits<sup>2</sup>

The **City of Prairie du Chien** maintains a log to track and resolve transit related complaints, investigations and lawsuits.

**Check One:**

**X**

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with the **City of Prairie du Chien**.

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

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

<sup>3</sup> **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 the **City of Prairie du Chien** 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 the **City of Prairie du Chien** service area to participate in the development of plans, programs and services.

#### **Strategies**

In order to promote inclusive public participation, the **City of Prairie du Chien** 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 the **City of Prairie du Chien** 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**

The **City of Prairie du Chien** 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

The **City of Prairie du Chien** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City of Prairie du Chien** 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 the **City of Prairie du Chien** are summarized 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. 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	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Staff Members Responsible	Notes
Ongoing	Website	Website and Social Media Materials	Website, Facebook	City Staff	<a href="http://www.cityofpdc.com">www.cityofpdc.com</a>
Every Two Months	Crawford County Transportation Coordination Committee	Every other month meeting	ARDC & Coordination Committee	City Staff	Discuss SRT Service
Every Six Months	City Council Monthly Meeting	City Website, Public notice	City Staff	City Meeting	Discuss SRT Service

## **Appendix 6**

### **Limited English Proficiency (LEP) Plan**

#### **Overview**

As a recipient of federal financial assistance, the **City of Prairie du Chien** 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) the **City of Prairie du Chien** 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**

The **City of Prairie du Chien** 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 the **City of Prairie du Chien**.

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, the **City of Prairie du Chien** 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, the **City of Prairie du Chien** 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 City of Prairie du Chien program or service.**

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

The US Census Bureau – American Fact Finder (2011-2015) data shows there are numerous languages spoken in Crawford county. Some of these languages include Spanish, Hmong, Other Native North American Languages, Chinese, Korean, German, and Tagalog. After English, the second largest language group is Spanish.

See **Appendix 8** for supporting Census data.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **City of Prairie du Chien** must provide translation of vital documents in written format for non-English speaking persons.

US Census data shows that in Crawford County, with a population estimate of 15,644, 53 people have identified themselves as Spanish speaking and “speaks English less than very 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 the **City of Prairie du Chien** 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, the **City of Prairie du Chien** is also not required to provide written translation of vital documents in these languages.

In the future, if the **City of Prairie du Chien** 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.**

The **City of Prairie du Chien** and its contractor, **Running Inc.** provides transportation service for the **City of Prairie du Chien** and in **Crawford County** (a seven-days a week, door-to-door, demand-responsive, advanced reservation, shared-ride taxi service that is made available to the general public within the City of Prairie du Chien and approximately 2 miles beyond the border of the municipality. The service operates 365 days annually).

The **City of Prairie du Chien** reviewed the frequency with which its staff, policy board, and contractors have, or could have, contact with LEP persons in the conduct of **City of Prairie du Chien** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. Within the last year, **City of Prairie du Chien** staff, policy board members, and contractors have had **zero** requests for interpreters and **zero** requests for translated program documents in any setting.

**City of Prairie du Chien** staff, policy board members, and **Running Inc.** staff will be trained on what to do when they encounter a person with limited English proficiency.

The **City of Prairie du Chien** with assistance from its contractor, **Running Inc.**, 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 the **City of Prairie du Chien's** programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

### **Log of LEP Encounters**

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

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

## ***“I Speak” Language Identification Card***

<b>Mark this box if you speak....</b>	<b>Language Identification Chart</b>	<b>Language</b>
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Chinese
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

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.**

The **City of Prairie du Chien** receives federal financial assistance to provide transportation service within the City of Prairie du Chien and approximately 2 miles beyond the border of the municipality **and to purchase vehicles for its program and services for the general public including seniors and individuals with disabilities.**

The **City of Prairie du Chien** and our contractor, **Running Inc.**, 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. Transportation services provides a key role in connecting LEP persons to these essential services.

### ***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. The **City of Prairie du Chien** will contact state and local units of government and community resources for assistance in translation services.

Even though the **City of Prairie du Chien** 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 **City of Prairie du Chien's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

**City of Prairie du Chien** will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

**City of Prairie du Chien** strives to offer the following measures:

- ✓ When encountering LEP persons directly, **City of Prairie du Chien** staff use 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.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Work with translation services as necessary to assist with the development of bilingual outreach materials.
- ✓ 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>
- ✓ 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 the **City of Prairie du Chien** on limited basis. Instead, the **City of Prairie du Chien** will seek assistance from fluent speakers.
- ✓ Prioritize the hiring of bilingual staff, as needed.

### **Public Outreach – Informing LEP Persons of Language Assistance Services**

The **City of Prairie du Chien** 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 the **City of Prairie du Chien** to request information in another language.

- ✓ When encountering LEP persons directly, **City of Prairie du Chien** will use the “*I Speak*” *Language Identification Card* to identify the language and communication needs of LEP persons. **City of Prairie du Chien** 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.
- ✓ 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 a fluent speaker on staff, seeking out language assistance from community organizations, 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>

### **Monitoring, Evaluating and Updating the Plan**

The **City of Prairie du Chien** 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 the **City of Prairie du Chien’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 **City of Prairie du Chien** staff:

- ✓ Information on the **City of Prairie du Chien’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.



## **Appendix 7**

### **Demographic Representation Information**

[FTA Title VI Circular 4702.1B](#) requires recipients of federal transit funds which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, to report the race of its members and describe the efforts made to encourage the participation of minorities on these committees.

#### **A. Demographic Representation Table<sup>4</sup>**

See **Appendix 8** for supporting Census data.

Service Area	Caucasian	Hispanic / Latino	Black/ African American	Asian American	Native American	Two or More Races
Crawford County Population	95%	1.3%	1.7%	.4%	.5%	1.2%
Common Council of the City of Prairie du Chien	N/A - Membership on the Common Council is elected.					

#### **B. Efforts to Encourage Minority Participation**

The **City of Prairie du Chien** does not have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies.

The **City of Prairie du Chien** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City of Prairie du Chien** encourages participation of all its citizens. As vacancies on non-elected boards, committees and councils become available, the **City of Prairie du Chien** will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, the **City of Prairie du Chien** will continue to reach out to community organizations to connect with all population groups in its service area. In addition, the **City of Prairie du Chien** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

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<sup>4</sup> 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 Form<sup>5</sup>

### Name of board, commission, council, etc.

Date:

---

Dear Member,

The **City of Prairie du Chien**, 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 **City of Prairie du Chien** 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 **City of Prairie du Chien**, 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.

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<sup>5</sup> This form is an optional tool **City of Prairie du Chien** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI plan requirements.

## **Appendix 8**

### **Applicable Supporting Census Data**

B16001

## LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over

2011-2015 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

**Tell us what you think.** Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Crawford County, Wisconsin	
	Estimate	Margin of Error
Total:	15,644	+/-27
Speak only English	15,174	+/-102
Spanish or Spanish Creole:	159	+/-52
Speak English "very well"	106	+/-46
Speak English less than "very well"	53	+/-23
French (incl. Patois, Cajun):	33	+/-25
Speak English "very well"	3	+/-6
Speak English less than "very well"	30	+/-24
French Creole:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Italian:	1	+/-2
Speak English "very well"	1	+/-2
Speak English less than "very well"	0	+/-14
Portuguese or Portuguese Creole:	2	+/-3
Speak English "very well"	0	+/-14
Speak English less than "very well"	2	+/-3
German:	102	+/-66
Speak English "very well"	88	+/-52
Speak English less than "very well"	14	+/-20
Yiddish:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other West Germanic languages:	15	+/-11
Speak English "very well"	6	+/-5
Speak English less than "very well"	9	+/-9
Scandinavian languages:	19	+/-10
Speak English "very well"	12	+/-7
Speak English less than "very well"	7	+/-6
Greek:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14

	Crawford County, Wisconsin	
	Estimate	Margin of Error
Russian:	2	+/-3
Speak English "very well"	2	+/-3
Speak English less than "very well"	0	+/-14
Polish:	2	+/-3
Speak English "very well"	2	+/-3
Speak English less than "very well"	0	+/-14
Serbo-Croatian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other Slavic languages:	27	+/-29
Speak English "very well"	20	+/-23
Speak English less than "very well"	7	+/-8
Armenian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Persian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Gujarati:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Hindi:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Urdu:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other Indic languages:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other Indo-European languages:	4	+/-5
Speak English "very well"	4	+/-5
Speak English less than "very well"	0	+/-14
Chinese:	8	+/-9
Speak English "very well"	2	+/-3
Speak English less than "very well"	6	+/-9
Japanese:	11	+/-11
Speak English "very well"	11	+/-11
Speak English less than "very well"	0	+/-14
Korean:	13	+/-16
Speak English "very well"	9	+/-12
Speak English less than "very well"	4	+/-5
Mon-Khmer, Cambodian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Hmong:	8	+/-15
Speak English "very well"	8	+/-15
Speak English less than "very well"	0	+/-14
Thai:	3	+/-4
Speak English "very well"	0	+/-14
Speak English less than "very well"	3	+/-4
Laotian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Vietnamese:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other Asian languages:	1	+/-3
Speak English "very well"	1	+/-3

	Crawford County, Wisconsin	
	Estimate	Margin of Error
Speak English less than "very well"	0	+/-14
Tagalog:	19	+/-17
Speak English "very well"	11	+/-12
Speak English less than "very well"	8	+/-10
Other Pacific Island languages:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Navajo:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Other Native North American languages:	28	+/-30
Speak English "very well"	7	+/-8
Speak English less than "very well"	21	+/-29
Hungarian:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Arabic:	0	+/-14
Speak English "very well"	0	+/-14
Speak English less than "very well"	0	+/-14
Hebrew:	4	+/-5
Speak English "very well"	4	+/-5
Speak English less than "very well"	0	+/-14
African languages:	7	+/-15
Speak English "very well"	7	+/-15
Speak English less than "very well"	0	+/-14
Other and unspecified languages:	2	+/-4
Speak English "very well"	2	+/-4
Speak English less than "very well"	0	+/-14

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

#### Explanation of Symbols:

1. An '\*\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '\*\*\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.

7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

B03002

## HISPANIC OR LATINO ORIGIN BY RACE

Universe: Total population

2013-2017 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

	Crawford County, Wisconsin	
	Estimate	Margin of Error
Total:	16,313	*****
Not Hispanic or Latino:	16,100	*****
White alone	15,479	+/-14
Black or African American alone	276	+/-51
American Indian and Alaska Native alone	64	+/-21
Asian alone	82	+/-29
Native Hawaiian and Other Pacific Islander alone	0	+/-14
Some other race alone	0	+/-14
Two or more races:	199	+/-57
Two races including Some other race	0	+/-14
Two races excluding Some other race, and three or more races	199	+/-57
Hispanic or Latino:	213	*****
White alone	106	+/-19
Black or African American alone	16	+/-12
American Indian and Alaska Native alone	0	+/-14
Asian alone	0	+/-14
Native Hawaiian and Other Pacific Islander alone	0	+/-14
Some other race alone	27	+/-20
Two or more races:	64	+/-18
Two races including Some other race	40	+/-26
Two races excluding Some other race, and three or more races	24	+/-23

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

While the 2013-2017 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Explanation of Symbols:

1. An '\*\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '\*\*\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.



# **Mississippi River Regional Planning Commission**

## **Title VI Program /Limited English Proficiency Plan**

**2017**



# **Title VI Program / Limited English Proficiency Plan**

## **CONTACTS**

**All questions, comments, or requests for documents and services may be directed via phone, fax, e-mail, or in person to:**

Greg Flogstad  
Director  
Phone: 608.785.9396  
Fax: 608.785.9394  
E-mail: greg@mrrpc.com

OR

Peter Fletcher  
Transportation Planner  
Phone: 608.785.9396  
E-mail: peter@mrrpc.com

At:

Mississippi River Regional Planning Commission  
1707 Main St., Suite 435  
La Crosse, WI 54601

**Documents, meeting minutes and agendas, and other information may also be obtained on our website at:**

[www.mrrpc.com](http://www.mrrpc.com)

This Title VI Plan and other MRRPC documents may be viewed and downloaded from our website at: [www.mrrpc.com](http://www.mrrpc.com)



# Mississippi River Regional Planning Commission

## Commission Members

### **Buffalo County**

Mary Anne McMillan Urell (Fountain City)  
John Schlesselman (Fountain City)  
Del Twidt (Fountain City)

### **La Crosse County**

Vicki Burke, Sec./Treas. (Onalaska)  
Shelly Miller (Bangor)  
James Ehram (La Crosse)

### **Pierce County**

James Ross (Elmwood)  
Richard Purdy (River Falls)  
William Schroeder (Hager City)

### **Crawford County**

Greg Russell (Eastman)  
Gerald Krachey (Wauzeka)  
Ron Leys (Prairie du Chien)

### **Monroe County**

Sharon Folcey (Sparta)  
James Kuhn, Chairman (Cashton)  
Cedric Schnitzler (Sparta)

### **Trempealeau County**

Margaret M. Baecker (Independence)  
Phillip Borreson (Ettrick)  
Ernie Vold (Osseo)

### **Jackson County**

A. Brad Chown (Black River Falls)  
Ron Carney (Warrens)  
Todd Stittleburg (Black River Falls)

### **Pepin County**

Bruce Peterson (Pepin)  
Gerald Bauer (Durand)  
James Kraft (Durand)

### **Vernon County**

Nancy Jaekel (Stoddard)  
Jo Ann Nickelatti (Genoa)  
Herb Cornell (Coon Valley)



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## Purpose

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### Purpose for Title VI Program

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As a subrecipient of federal funds administered by the Federal Transit Administration (FTA) and/or the Federal Highway Administration (FHWA) from the State of Wisconsin the Mississippi River Regional Planning Commission (MRRPC) is required to comply with *Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987*, and all related regulations and statutes.

In addition, the MRRPC is required to comply with *Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted Programs of the U.S. Department of Transportation*.

The purpose of these regulations is to assure that no person or groups of persons shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the MRRPC, regardless of whether those programs and activities are federally funded or not. In addition, that the MRRPC will provide meaningful access to services for persons with Limited English Proficiency.

### Format of Title VI Program

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This Title VI Program is formatted to the requirements found in *FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The next section addresses the requirements for chapters III and VI of the Circular as they pertain to requirements and guidelines for the MRRPC. Each "requirement" includes verbatim language from the Circular in italics followed by a discussion of how the MRRPC meets the requirement.

## FTA Circular 4702.1B Title VI Requirements and Guidelines

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### Chapter III: General Requirements and Guidelines

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#### 2. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

*“In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations.”*

The MRRPC Title VI Assurances are included with this program in **Appendix A**.

#### 3. REQUIREMENTS FOR FIRST-TIME APPLICANTS

Not applicable.

#### 4. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

*“Title 49 CFR Section 21.9(b) requires recipients to ‘keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].’ ...For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA....Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program.*

MRRPC Title VI activities will be reported to MRRPC Commissioners annually at the December MRRPC Commission meeting and documented in meeting minutes. Annually, at the December Commission Meeting the MRRPC will self-certify compliance with Title VI requirements. Meeting minutes will be submitted to the Wisconsin Department of Transportation (per request) and will be available on the MRRPC website. A copy of the MRRPC Title VI Program is also available on the MRRPC website.

A copy of the MRRPC resolution approving this Title VI Program is included in **Appendix B**.

The requirements included in the “contents” part of this section (Section 4 Requirement to Prepare and Submit a Title VI Program) are also included and addressed in Sections 5 – 12 below, or are not applicable.

## 5. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

*“Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients shall disseminate this information to the public through measures that may include but are not limited to: posting a Title VI notice on the agency’s Web site, at the agency’s office, at stations or stops, and/or on transit vehicles.”*

The MRRPC Title VI notice is included in **Appendix C** and is posted on the MRRPC website and at the MRRPC office. The MRRPC does not provide transit services; other requirements of this section are not applicable.

## 6. REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

*“In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. Recipients must also develop a Title VI complaint form.”*

The MRRPC Title VI complaint procedures are in **Appendix D**, and the MRRPC Title VI complaint form is in **Appendix E**. The complaint procedure and complaint forms are posted on the MRRPC website and at the MRRPC office.

## 7. REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS.

*“In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient.”*

A standard report for annual reporting of Title VI Investigations, Complaints, and Law suits i.e. is found in **Appendix F**. Annual reports will be placed on file at the MRRPC office as a means to track Title VI investigations, complaints and lawsuits.

There have been no Title VI investigations, complaints or lawsuits filed with the MRRPC.

## **8. PROMOTING INCLUSIVE PUBLIC INVOLVEMENT.**

The MRRPC encourages inclusive public participation in preparation of all planning documents and programs. The following public participation plan identifies efforts the MRRPC utilizes to gain inclusive public involvement.

### **MRRPC Public Participation Plan**

To promote inclusive public participation in its planning activities, the MRRPC employs the following strategies, as appropriate:

#### **■Coordination & Consultation**

- The MRRPC will consult with agencies and officials responsible for other planning activities within the planning area that are affected by transportation in the development of transportation plans/programs, including Indian Tribal governments and Federal land management agencies, if applicable.
- The MRRPC will coordinate public involvement and consultation processes with applicable statewide transportation planning activities/processes.

#### **■Accessibility & Information**

- The MRRPC will hold public meetings at convenient and accessible locations and times.
- The MRRPC will make public information available in electronically accessible format and utilize social media (when applicable) in addition to other resources as a way to gain public involvement.
- The MRRPC will provide reasonable public access to technical and policy information used in the development of transportation plans/programs.
- The MRRPC will (when applicable) employ visualization techniques to describe transportation plans/programs.

#### **■Timeliness**

- The MRRPC will provide timely information about transportation issues and processes to all concerned stakeholders, including affected public agencies, private providers of transportation, and other interested parties and segments of the community affected by transportation plans/programs.
- The MRRPC will provide adequate public notice of public involvement activities and time for public review and comment. Public notices of meetings will be placed on the MRRPC website, emailed to persons/agencies on the MRRPC's diversified contact list, and published in local newspapers (when applicable). Additional notification methods will be utilized as appropriate.

#### **■Public Comment**

- The MRRPC will demonstrate explicit consideration and response to public input received during the development of transportation plans/programs.

-The MRRPC will provide an additional opportunity for public comment if the final transportation plans/programs differ significantly from the versions that were initially made available for comment.

-The MRRPC will include as part of the final transportation plans/programs a summary on the disposition of significant written or oral comments received on draft plans and programs.

**■Evaluation**

-The MRRPC will review the effectiveness of the public participation activities so as to ensure a full and open participation process.

-Public outreach efforts at a minimum will be conducted bi-monthly (six times a year) as part of the MRRPC Commission meetings. In 2018 and beyond this will include MRRPC Commission meetings in February, April, June, August, October, and December.

-The MRRPC will document and maintain public outreach efforts on the following table.

<b>Event Date</b>	<b>MRRPC Staffer(s)</b>	<b>Event</b>	<b>Date Publicized and Communication Method (Public Notice, Posters, Social Media)</b>	<b>Outreach Method (Meeting, Focus Group, Survey, etc).</b>	<b>Notes<sup>i</sup></b>
2/12/2014	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
4/09/14	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
6/11/2014	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
8/13/2014	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
10/8/2014	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
12/10/2014	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
2/11/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
4/8/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
6/10/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
8/12/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
10/14/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
12/9/2015	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
2/10/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	

## Title VI Program / Limited English Proficiency Plan

Event Date	MRRPC Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes <sup>i</sup>
4/13/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
6/8/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
8/10/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
10/12/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
12/14/2016	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
2/8/2017	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
4/12/2017	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
6/14/2017	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	
8/9/2017	Entire MRRPC Staff	MRRPC Bimonthly Meeting	Mailing to news media, county clerks, legislators, etc.	Meeting	

### STAKEHOLDERS

To reach all interested parties, the MRRPC has identified the following stakeholder groups as important participants in the public participation process for MRRPC transportation plans/programs:

#### Minority Populations

Minorities are defined as non-white persons within the Race and Hispanic or Latino Origin variable of the decennial census or ACS when applicable. Block groups whose non-white population has been determined to be significantly greater than the planning area average will be identified as areas of potential disproportionate impact.

Within the minority community reside those who may have limited English proficiency.

#### **Limited English Proficient (LEP)**

President Clinton signed Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, in August of 2000. This order requires that any agency that receives federal funds to establish a means of including Limited English Proficiency (LEP) persons in the planning process. The Attorney General for Civil Rights subsequently issued the guidance document, *Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons with Limited English Proficiency* [Department of

Justice (DOJ) LEP Guidance], to assist agencies in “taking reasonable steps to ensure ‘meaningful’ access to the information and services they provide.”

According to the DOJ LEP Guidance, “reasonable steps to ensure meaningful access” depend on a number of factors:

- The number or proportion of LEP persons that may be impacted by a project or program;
- The frequency with which LEP persons come in contact with the project or program;
- The importance of the service provided by the project or program; and
- The resources available to the receiving agency.

Anyone in need of interpretive services may contact the MRRPC office at 608-785-9396.

## 9. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS.

*“Taken together, Title VI of the Civil Rights Act of 1964, its implementing regulations, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” require recipients to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).”*

The MRRPC Limited English Proficiency Plan is included as **Appendix G**. The Limited English Proficiency Plan includes consideration of the Four Factor Analysis, Language Implementation Plan, and Safe Harbor Provision sections of Requirement 8.

## 10. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES.

*“Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar decision-making bodies must provide a table depicting the racial breakdown of the membership of those bodies, and a description of efforts made to encourage the participation of minorities on such decision-making bodies.”*

The MRRPC Commission is the sole decision-making body of the MRRPC. The Commission is comprised of three members from each of the nine counties in the MRRPC. MRRPC Commissioners are appointed to the commission by the Governor’s Office and County Boards.

## Title VI Program / Limited English Proficiency Plan

MRRPC staff encourages participation by all groups by invitation to bi-monthly meetings, public information meetings, etc. as outlined in the Public Participation Plan. Contacts are maintained in e-mail distribution lists and mail address lists.

Minority representation on MRRPC Commission is illustrated in Table 1. We recognize that the minority representation on our Commission is not reflective of the minority representation of our planning area, but members of minority groups are invited to attend commission meetings (i.e. Ho Chunk Nation, local chapter of the NAACP). MRRPC staff encourages participation by all groups by invitation to bi-monthly meetings and public information meetings. All Commission meetings are open to the public and meeting notices are posted on the MRRPC website and mailed to media outlets.

**TABLE 1: Minority Composition of MRRPC**

Non Hispanic White	Black or African American	American Indian/ Alaska Native	Asian	Native Hawaiian/ Pacific Islander	Hispanic or Latino	Some Other Race
100%	0%	0%	0%	0%	0%	0%

### 11. PROVIDING ASSISTANCE TO SUBRECIPIENTS.

Not applicable; MRRPC is a subrecipient.

### 12. MONITORING SUBRECIPIENTS.

Not applicable; MRRPC is a subrecipient.

## Chapter VI: Requirements for Planning Organizations

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### 2. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.

*“For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. FTA will review and grant approval or conditional approval for Title VI Programs. Subrecipients, including MPOs that receive Federal planning money from the State, shall submit Title VI Programs to the State as the primary recipient from whom they receive funding, in order to assist the State in its compliance efforts.”*

A copy of the MRRPC resolution approving this Title VI Program is included in Appendix B:

In its regional transportation planning capacity, the MRRPC shall submit to the State, as a sub-recipient:



(1) The information required under section 4 of chapter III (General Requirements) of this Circular (included above);

(2) A demographic profile of the Region that includes identification of the locations of minority populations as covered by Title VI:

The MRRPC uses the RACE AND HISPANIC OR LATINO ORIGIN variable from the U.S. Census to determine the distribution of minority and white populations as summarized in Table 2. Minorities are defined as Black or African American Alone, American Indian and Alaska Native Alone, Native Hawaiian or Other Pacific Islander Alone, Some Other Race Alone, and Two-or-more Races. Persons of Hispanic or Latino origin may be of any race.

**Table 2: MRRPC Region Race Data - 2011-2015 U.S. Census Data, American Community Survey**

County	Population											
	Population	Non-Hispanic White	Hispanic	Total Minority <sup>(2)</sup>	Non-Hispanic White	Total Minority <sup>(2)</sup>	Black or African American Alone	American Indian or Alaskan Native Alone	Asian Alone	Native Hawaiian or Other Pacific Islander Alone	Some other race alone	Two or more races
	Total				Percent		Percent of Total Population					
Region	320,529	295,876	8,125	24,653	93.3	6.7	1.1	0.7	2.0	0.0	0.1	1.3
Buffalo	13,319	12,834	264	485	96.4	3.6	0.5	0.2	0.1	0	0.8	0.9
Crawford	16,483	15,742	180	741	95.5	4.5	1.8	0.6	0.4	0	0	0.7
Jackson	20,543	17,807	638	2,736	86.7	13.3	2.3	5.4	0.5	0	0.1	2.0
La Crosse	117,048	106,003	1,990	11,045	90.6	9.4	2.2	0.8	4.9	0.1	0.7	1.4
Monroe	45,274	41,470	1,795	3,804	91.6	8.4	1.0	0.9	0.7	0	0	2.2
Pepin	7,372	7,154	100	218	97.0	3.0	0.4	0.1	0.2	0	0	0.9
Pierce	40,799	38,712	750	2,087	94.9	5.1	0.5	0.3	1.1	0	0.2	1.2
Trempealeau	29,412	26,941	1,941	2,471	91.6	8.4	0.5	0.2	0.5	0	0	0.7
Vernon	30,279	29,213	467	1,066	96.5	3.5	0.5	0.2	0.5	0	0.1	0.7

(1) Minority race categories include Black or African American Alone, American Indian or Alaska Native Alone, Asian, Native Hawaiian or Other Pacific Islander Alone, Some Other Race Alone, and Two or More Races. Persons of Hispanic or Latino origin may be of any race.

(2) Minority population includes all persons of minority races and the white race with Hispanic or Latino origin.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5 Year Estimates

(3) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process:

The procedures by which the mobility needs of minority populations are identified and considered in the MRRPC planning process include 1) public outreach and 2) Statistical/Mapping analysis.

Public outreach involves inviting members of minority organizations to participate on our committees and in planning activities (i.e. public input meetings, focus groups). We maintain a distribution list of contacts that includes persons from the Ho Chunk Nation,

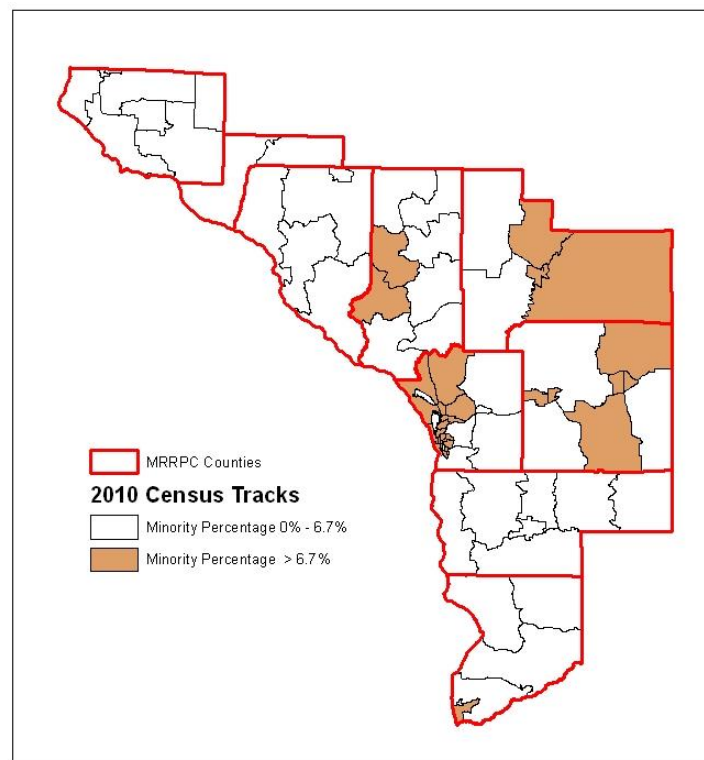
the local chapter of the NAACP, the Hmong Mutual Assistance Association, etc. to name a few.

Statistical/Mapping analysis is used to identify the location(s) of minority persons.

Other requirements of Section 2 are not applicable for the MRRPC as a subrecipient.

(4) Demographic maps that overlay the percent minority and non-minority populations and charts that analyze the impacts of the distribution of State and Federal funds for public transportation purposes.

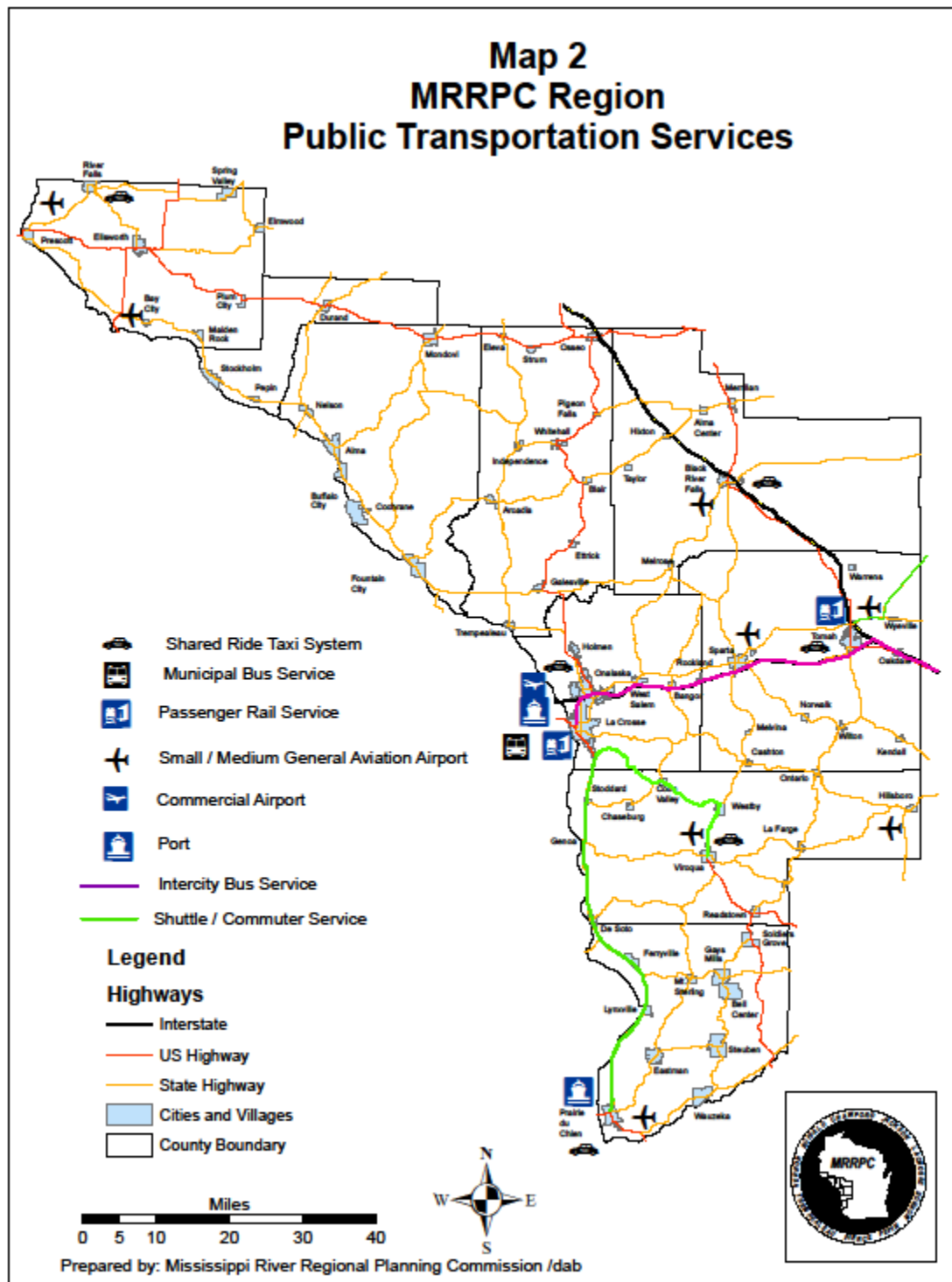
Figure 1 illustrates the census tracts in the planning area that have a percent minority higher than the percent minority of the planning area (6.7%). The MRRPC is a planning organization and does not operate a public transit system or have approval authority over transportation or transit related projects. As highlighted in the MRRPC Public Participation Plan, efforts are made to reach and notify all persons.



**Figure 1:** Census Tracts with a percent minority greater than the percent minority of the planning area.

(5) An analysis of impacts identified in paragraph (4) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

Taken in whole, publicly funded transportation services provided in the MRRPC Region do not propose disproportionately high and adverse impacts on minority populations. The benefits of the transportation services and improvements provided are reasonably distributed as illustrated in Figure 2 to serve the needs of all populations in the area.



### **3. PLANNING.**

*“All MPOs are responsible for conducting planning activities that comply with 49 U.S.C. Section 5303, Metropolitan Transportation Planning, as well as subpart C of 23 CFR part 450, Metropolitan Transportation Planning and Programming, for a specified metropolitan planning area.”*

U.S. Department of Transportation regulations provide for self-certification that the planning activities of the MRRPC are being carried out in conformance with these and other applicable requirements. This self-certification is included in the annual MRRPC Planning Work Program and certified in the Work Program’s approval by the Wisconsin DOT and the MRRPC.

### **4. DESIGNATED RECIPIENT.**

Not applicable; MRRPC is a subrecipient.

### **5. DIRECT RECIPIENT.**

Not applicable; MRRPC is a subrecipient.

### **6. REQUIREMENTS FOR PROGRAM ADMINISTRATION.**

Not applicable; MRRPC is a subrecipient.



## Appendix A: MRRPC Title VI Assurances

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### TITLE VI ASSURANCES

The Mississippi River Regional Planning Commission (MRRPC), (hereinafter referred to as the Recipient) HEREBY AGREES THAT, as a condition to receiving any federal financial assistance from the U. S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted Programs of the U.S. Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives to the end that, in accordance with the Act, regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance through the Wisconsin Department of Transportation or the U.S. Department of Transportation; and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Aid Highway or Transit Programs:

1. That the Recipient agrees that each “program” and each “facility,” as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or materials subject to the regulations and made in connection with the Federal-Aid Highway or Transit Programs and, in adapted form, in all proposals for negotiated agreements:

The Recipient, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4, and Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted Programs of the U.S. Department of Transportation, issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, Disadvantaged Business Enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color or national origin in consideration for an award.

**Title VI Program / Limited English Proficiency Plan**

3. That the Recipient shall insert the clauses of Appendix A in every contract subject to the Act and the Regulations.
4. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom he or she delegates specific authority, to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed by or pursuant to the Act, the Regulations, and this assurance.
5. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, discounts, or other Federal financial assistance extended after the date hereof to the Recipient by the U.S. Department of Transportation under the Federal-Aid Highway or Transit Programs and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal-Aid Highway or Transit Programs. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

\_\_\_\_\_  
James Kuhn, MRRPC Chairperson

\_\_\_\_\_  
Date

\_\_\_\_\_  
Greg Flogstad, Director

\_\_\_\_\_  
Date



## Appendix B: MRRPC Resolution Approving Title VI Program

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### RESOLUTION 12.13.17

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Resolution committing to comply with the Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 and all regulations and statutes including a Limited English Proficiency Plan

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**WHEREAS**, the United States Department of Transportation regulations require the MRRPC to establish and maintain a Title VI Program to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate into its programs and activities considerations expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons (70 FR 74087, December 14, 2005).; and

**WHEREAS**, the MRRPC intends that no person shall, on the grounds of race, color, gender, religion or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MRRPC program or activity, regardless of funding source; and

**WHEREAS**, the MRRPC will affirmatively ensure that in any contract entered into, Disadvantaged Business Enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color or national origin in consideration for an award; and

**NOW, THEREFORE, BE IT RESOLVED:** that the MRRPC approves the *Mississippi River Regional Planning Commission Title VI Program / Limited English Proficiency Plan*.

This is to certify that the foregoing is a true and correct copy of resolution number 12.13.2017 duly and legally adopted by the Mississippi River Regional Planning Commission on the 13th day of December 2017.

  
Chairman

Certified   
Vicki Burke, Secretary-Treasurer

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## Appendix C: MRRPC Title VI Notice

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The **Mississippi River Regional Planning Commission's** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

### THE MISSISSIPPI RIVER REGIONAL PLANNING COMMISSION

- ✓ The **Mississippi River Regional Planning Commission** 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 **Mississippi River Regional Planning Commission**.
- ✓ For more information on the **Mississippi River Regional Planning Commission's** civil rights program, and the procedures to file a complaint, contact 608-785-9396, email [plan@mrrpc.com](mailto:plan@mrrpc.com), visit our administrative office at 1707 Main Street, Suite 435, La Crosse, State 54601. For more information, visit [www.mrrpc.com](http://www.mrrpc.com).
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 608-785-9396.  
*Si se necesita informacion en otro idioma de contacto, 608-785-9396.*  
Yog tias cov ntaub ntawv uas yuav tsum tau ua lwm hom lus, hu rau, 608-785-9396.

The **Mississippi River Regional Planning Commission's** Notice to the Public is posted in the following locations: *(check all that apply)*

- ☐ Agency website [[www.mrrpc.com](http://www.mrrpc.com)]
- ☐ Public areas of the agency office (common area, public meeting rooms, etc.)
- ☐ Inside vehicles
- ☐ Rider Guides/Schedules
- ☐ Transit shelters and stations
- ☐ Other, \_\_\_\_\_

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## Appendix D: MRRPC Title VI Complaint Procedures

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The scope of Title VI covers all external MRRPC activities. Adverse impacts resulting in Title VI complaints can arise from many sources, including advertising, bidding, and contracts.

Complaints can originate from individuals or firms alleging inability to bid upon or obtain a contract with MRRPC for the furnishing of goods and/or services. Examples include advertising for bid proposals; prequalification or qualification; bid proposals and awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, fee appraisers, universities, etc.

Complaints can originate as a result of project impacts on individuals or groups. For example, social and economic, traffic, noise, air quality, access, accidents, and failure to maintain facilities.

### Formal Title VI Complaint Procedure

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The Mississippi River Regional Planning Commission's Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ☐ Agency website, [www.mrrpc.com](http://www.mrrpc.com), 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, \_\_\_\_\_
- 

The MRRPC Title VI Policy assures that no person or groups of persons shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by MRRPC, its recipients, subrecipients, and contractors. In addition, Executive Order 12898 (Environmental Justice) prohibits discrimination based on income status.

MRRPC uses the following procedures for prompt processing of all Title VI complaints received directly by it. These procedures include but are not limited to:

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Mississippi River Regional Planning Commission may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Mississippi River Regional Planning Commission investigates complaints received no more than 180 days after the alleged incident. The Mississippi River Regional Planning Commission will process complaints that are complete.

Once the complaint is received, the Mississippi River Regional Planning Commission 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.

## **Title VI Program / Limited English Proficiency Plan**

The Mississippi River Regional Planning Commission (MRRPC) has 60 days to investigate the complaint. If more information is needed to resolve the case, the city 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, the MRRPC 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 15 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 608-785-9396.

Si se necesita informacion en otro idioma de contacto, 608-785-9396.

Yog tias cov ntaub ntawv uas yuav tsum tau ua lwm hom lus, hu rau, 608-785-9396.

## Appendix E: MRRPC Title VI Complaint Form

### Title VI Complaint Form

The Mississippi River Regional Planning Commission's Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ☐ Agency 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

**Title VI Program / Limited English Proficiency Plan**

<b>Section V</b>
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name: _____
Title: _____
Agency: _____
Address: _____
Telephone: _____
<b>Section VI</b>
Name of agency complaint is against: _____
Contact person: _____
Title: _____
Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:

Attn: Title VI Coordinator  
Mississippi River Regional Planning Commission  
1707 Main Street, Suite 435  
La Crosse, State 54601



## INSTRUCTIONS

1. Under Title VI of the Civil Rights Act of 1964 and the related statutes and regulations, no person or groups(s) of persons shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the MRRPC. Any person or groups(s) of persons who feel they have been discriminated against may file a complaint.
2. Instructions provided within this form are not meant to be all inclusive. Complainants are responsible for all procedural requirements.
3. Complainants **must** include all required information and **must** meet all timeframes as defined in the MRRPC Title VI Complaint Procedure. (NOTE: The complaint **must** be filed in writing no later than 180 days after the date of the alleged discrimination.)
4. Legible copies of all available pertinent documentation should be attached to this form.
5. All inquiries should be directed to MRRPC, attn: Greg Flogstad, Director, 1707 Main St., Suite 435, La Crosse, WI, 54601.

**PART I:** Complete all information in this section.

**PART II:** Complete required information in this section.

**PART III:** Check all boxes that apply indicating the basis for the complaint. The discrimination **must** be based on at least one of the listed categories. State the specific complaint in a manner that clearly identifies the issues upon which the complaint is based.

**PART IV:** Answer "Yes" or "No" to this question.

**PART V:** Complete required information in this section.

**PART VI:** Complete all information in this section.

Sign and Date the Form.

### Complaints filed with U. S. Department of Transportation

Discrimination complaints based on race, color sex, age, national origin, disability/handicap, and income status may be filed with the Secretary, U.S. Department of Transportation, Room 4132, 400 Seventh Street, Southwest, Washington, D.C. 20590. The complaint **must** be filed, in writing, no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary, U.S. Department of Transportation.

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## Appendix F: MRRPC Annual Report of title VI Investigations, Complaints and Lawsuits

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### List of Transit Related Title VI Investigations, Complaints and Lawsuits

Subrecipient: Mississippi River Regional Planning Commission		
Contact Person: Greg Flogstad	Signature:	Date: December 12, 2017

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)	Complainant's Name/Address	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>					
1.					
2.					
<b>Lawsuits</b>					
1.					
2.					
<b>Complaints</b>					
1.					
2.					

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## Appendix G: MRRPC Limited English Proficiency Plan

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### Plan Summary

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This *Limited English Proficiency Plan* has been prepared to address MRRPC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The 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 titled, *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

MRRPC has developed its *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, MRRPC used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the MRRPC Region who may be served by the MRRPC.
2. The frequency with which LEP persons come in contact with MRRPC programs or services.
3. The nature and importance of programs or services provided by MRRPC to the LEP population.
4. The interpretation services available to MRRPC and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## Meaningful Access: Four-Factor Analysis

### 1. The number or proportion of LEP persons in the service area who may be served or are likely to require MRRPC services.

The MRRPC staff obtained data from the 2011-2015 American Community Survey 5-year estimates for LANGUAGE SPOKEN AT HOME for each county in the MRRPC Region. Table G1 below shows the number and percent of population in the Spanish and Hmong population groups that speak English "Less than very well" by county in the region. As illustrated in La Crosse County the Hmong and Hispanic populations meets the Safe Harbor Threshold (over 1,000) and the MRRPC will provide translation of vital documents in written formats as applicable.

**Table G1 - LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over**

	Total Population	Speak only English	Speak English "Less than Very Well"			
			Spanish	%	Hmong	%
Buffalo County	12,597	12,234	143	1.14%	0	0.00
Crawford County	15,644	15,174	53	0.34%	0	0.00
Jackson County	19,312	18,078	125	0.65%	0	0.00
La Crosse County	110,940	102,695	1,183	1.07%	1,495	1.35%
Monroe County	42,065	38,581	730	1.74%	0	0.00
Pepin County	6,956	6,561	30	0.43%	0	0.00
Pierce County	38,628	37,357	151	0.39%	54	0.14%
Trempealeau County	27,429	25,403	758	2.76%	27	0.10%
Vernon County	28,165	24,879	133	.47%	0	0.00

Source: 2011-2015 American Community Survey 5-Year Estimates

Note: Less than 1% of all other population groups speak English "Less than Very Well". No other population group other than the Hmong and Hispanic populations in La Crosse County exceeds the 1,000 population threshold for speaking English "Less Than Very Well".

### 2. The frequency with which LEP persons come in contact with MRRPC services or programs.

MRRPC staff reviewed the frequency with which its Commission, staff, and contractors have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the MRRPC has had no requests for interpreters and no requests for translated program documents. The MRRPC Commission and staff have had very little contact with LEP persons.

### **3. The nature and importance of services and programs provided by MRRPC to the LEP population.**

The overwhelming majority of the population 5 years and over in the MRRPC Region, 93.5%, speaks only English. As a result, there are few social services or professional and leadership organizations in the MRRPC Region that focus on outreach to LEP individuals. MRRPC Commissioners and staff are most likely to contact LEP individuals through public meetings and other general public involvement opportunities.

### **4. The resources available to MRRPC and overall costs to provide LEP assistance.**

MRRPC has reviewed its available resources that could be used for providing LEP assistance. The resources include access to Hmong language assistance through the La Crosse County and access to additional interpretive services through member County agencies.

## **Language Assistance**

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A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to MRRPC's programs and services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How MRRPC staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- MRRPC staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- MRRPC staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- A notice will be posted on the MRRPC website and at the MRRPC office specifying that special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals) will be available when MRRPC sponsors an informational meeting or event. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

### **Language Assistance Measures**

Although there is a low percentage in the MRRPC Region of LEP individuals, that is, persons who speak English “less than very well” MRRPC will strive to offer the following measures:

1. The MRRPC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Interpretive services, within reason, will be provided for public meetings, if advance notice is provided to the MRRPC and such services are readily available;
  - The MRRPC will make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon request, within a reasonable time frame and if resources permit.

### **Staff Training**

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The following training will be provided to all MRRPC staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

### **Translation of Documents**

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MRRPC weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, MRRPC will consider the translation of documents (or portions thereof) on a case by case basis, as requested.

When and if the need arises for LEP outreach related to MRRPC’s programs and services, it will coordinate with the municipalities in the MRRPC Region to determine an appropriate course of action in regard to existing interpretive and outreach resources available.



## Monitoring

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MRRPC will review the LEP Plan annually with its self-certification procedure per 23 CFR 450.334. An annual review and update (if appropriate) will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether MRRPC's financial resources are sufficient to fund language assistance resources needed.
- Determine whether MRRPC fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

## Notice of MRRPC'S LEP Plan

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**The MRRPC will provide notice of the LEP Plan by:**

- Posting notice of the LEP Plan signs at conspicuous and accessible locations in the MRRPC's office notifying LEP persons of the LEP Plan and how to access language services.
- Including as part of public notices and related materials on the MRRPC website that LEP persons needing interpretative service may contact the MRRPC.
- Posting the LEP Plan on the MRRPC website.

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## Appendix H: Language Spoken at Home by Ability to Speak English

**MRRPC REGION - LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over**

	Buffalo	Crawford	Jackson	La Crosse	Monroe	Pepin	Pierce	Trempealeau	Vernon
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
<b>Total:</b>	<b>12,597</b>	<b>15,644</b>	<b>19,312</b>	<b>110,490</b>	<b>42,065</b>	<b>6,956</b>	<b>38,628</b>	<b>27,429</b>	<b>28,165</b>
Speak only English	12,234	15,174	18,078	102,695	38,581	6,561	37,357	25,403	24,879
Spanish or Spanish Creole:	202	159	339	2,283	1,488	85	498	1,353	356
Speak English "very well"	59	106	214	1,100	758	55	347	595	223
<b>Speak English less than "very well"</b>	<b>143</b>	<b>53</b>	<b>125</b>	<b>1,183</b>	<b>730</b>	<b>30</b>	<b>151</b>	<b>758</b>	<b>133</b>
French (incl. Patois, Cajun):	13	33	6	310	36	5	50	45	38
Speak English "very well"	7	3	3	243	24	5	50	45	19
<b>Speak English less than "very well"</b>	<b>6</b>	<b>30</b>	<b>3</b>	<b>67</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>19</b>
French Creole:	0	0	0	11	0	0	0	0	3
Speak English "very well"	0	0	0	11	0	0	0	0	3
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Italian:	8	1	2	49	9	0	2	3	10
Speak English "very well"	8	1	2	49	2	0	2	0	10
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>
Portuguese or Portuguese Creole:	0	2	0	0	1	0	74	1	0
Speak English "very well"	0	0	0	0	1	0	9	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>65</b>	<b>1</b>	<b>0</b>
German:	92	102	374	681	1,200	131	127	255	1,574
Speak English "very well"	63	88	296	486	948	122	108	177	1,137
<b>Speak English less than "very well"</b>	<b>29</b>	<b>14</b>	<b>78</b>	<b>195</b>	<b>252</b>	<b>9</b>	<b>19</b>	<b>78</b>	<b>437</b>
Yiddish:	0	0	0	10	0	0	0	0	0
Speak English "very well"	0	0	0	10	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Other West Germanic languages:	20	15	98	7	333	139	19	71	933
Speak English "very well"	6	6	60	7	168	66	17	41	569
<b>Speak English less than "very well"</b>	<b>14</b>	<b>9</b>	<b>38</b>	<b>0</b>	<b>165</b>	<b>73</b>	<b>2</b>	<b>30</b>	<b>364</b>
Scandinavian languages:	5	19	20	54	10	2	44	95	189
Speak English "very well"	5	12	16	42	10	2	28	78	173
<b>Speak English less than "very well"</b>	<b>0</b>	<b>7</b>	<b>4</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>17</b>	<b>16</b>
Greek:	0	0	0	11	0	0	0	0	4
Speak English "very well"	0	0	0	11	0	0	0	0	4
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Russian:	1	2	0	122	5	0	24	0	0
Speak English "very well"	1	2	0	122	3	0	23	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>
Polish:	9	2	7	9	23	0	1	58	2
Speak English "very well"	6	2	5	9	14	0	1	38	2
<b>Speak English less than "very well"</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>0</b>
Serbo-Croatian:	0	0	0	2	7	8	0	7	0
Speak English "very well"	0	0	0	2	5	1	0	7	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>
Other Slavic languages:	0	27	3	13	25	7	4	2	32
Speak English "very well"	0	20	3	13	25	5	2	2	27
<b>Speak English less than "very well"</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>5</b>
Armenian:	0	0	0	5	0	0	0	0	0
Speak English "very well"	0	0	0	5	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Persian:	0	0	0	0	10	0	0	0	0
Speak English "very well"	0	0	0	0	10	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	0	0	0	0	0	0	0	0	0

**Title VI Program / Limited English Proficiency Plan**

**MRRPC REGION - LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over**

	Buffalo	Crawford	Jackson	La Crosse	Monroe	Pepin	Pierce	Trempealeau	Vernon
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Gujarati:									
Speak English "very well"	0	0	0	0	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Hindi:	0	0	0	0	15	0	0	0	0
Speak English "very well"	0	0	0	0	10	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Urdu:	0	0	0	47	0	0	0	0	0
Speak English "very well"	0	0	0	41	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Other Indic languages:	8	0	0	37	7	0	39	0	2
Speak English "very well"	8	0	0	37	7	0	35	0	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>
Other Indo-European languages:	0	4	2	5	9	0	0	7	2
Speak English "very well"	0	4	2	5	9	0	0	7	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Chinese:	0	8	0	243	6	0	187	10	77
Speak English "very well"	0	2	0	117	6	0	24	10	70
<b>Speak English less than "very well"</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>126</b>	<b>0</b>	<b>0</b>	<b>163</b>	<b>0</b>	<b>7</b>
Japanese:	0	11	9	26	9	0	3	3	2
Speak English "very well"	0	11	9	26	6	0	3	3	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Korean:	0	13	1	83	35	7	6	6	0
Speak English "very well"	0	9	1	23	7	0	0	6	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>60</b>	<b>28</b>	<b>7</b>	<b>6</b>	<b>0</b>	<b>0</b>
Mon-Khmer, Cambodian:	0	0	0	0	0	0	0	0	0
Speak English "very well"	0	0	0	0	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Hmong:	0	8	13	3,327	42	0	139	34	17
Speak English "very well"	0	8	8	1,832	42	0	85	7	16
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>1,495</b>	<b>0</b>	<b>0</b>	<b>54</b>	<b>27</b>	<b>1</b>
Thai:	0	3	0	11	6	0	0	10	2
Speak English "very well"	0	0	0	9	0	0	0	4	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>
Laotian:	0	0	42	8	0	0	0	0	0
Speak English "very well"	0	0	26	8	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Vietnamese:	0	0	0	63	1	0	0	4	0
Speak English "very well"	0	0	0	40	1	0	0	4	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Other Asian languages:	0	1	2	112	0	0	0	0	1
Speak English "very well"	0	1	0	112	0	0	0	0	1
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Tagalog:	0	19	12	18	42	3	25	21	16
Speak English "very well"	0	11	12	18	37	3	25	9	8
<b>Speak English less than "very well"</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>8</b>
Other Pacific Island languages:	0	0	2	28	2	8	9	0	0
Speak English "very well"	0	0	0	28	0	8	9	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Navajo:	0	0	0	0	0	0	0	0	0
Speak English "very well"	0	0	0	0	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Other Native North American languages:	5	28	289	92	130	0	5	15	14
Speak English "very well"	5	7	273	87	86	0	5	15	14
<b>Speak English less than "very well"</b>	<b>0</b>	<b>21</b>	<b>16</b>	<b>5</b>	<b>44</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**MRRPC REGION - LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over**

	Buffalo	Crawford	Jackson	La Crosse	Monroe	Pepin	Pierce	Trempealeau	Vernon
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Hungarian:	0	0	0	0	0	0	0	0	0
Speak English "very well"	0	0	0	0	0	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Arabic:	0	0	13	92	23	0	0	0	0
Speak English "very well"	0	0	6	59	7	0	0	0	0
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>33</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Hebrew:	0	4	0	0	0	0	0	6	6
Speak English "very well"	0	4	0	0	0	0	0	6	6
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
African languages:	0	7	0	36	5	0	12	20	4
Speak English "very well"	0	7	0	36	5	0	12	20	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
Other and unspecified languages:	0	2	0	0	5	0	3	0	2
Speak English "very well"	0	2	0	0	3	0	3	0	2
<b>Speak English less than "very well"</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: 2011-2015 American Community Survey 5-Year Estimates