

# Title VI Plan

## Richland County, Wisconsin

Adopted on: August 19, 2014 / updated  
8/12/2020 RLG

Adopted by: Richland County

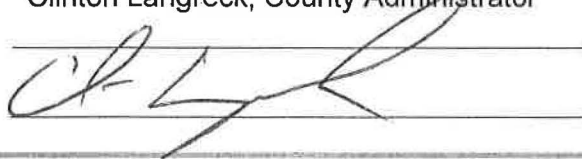
Revised on: Not Applicable

*This policy is hereby adopted and signed by:*

### Richland County

Executive Name/Title: Clinton Langreck, County Administrator

Executive Signature:



### Policy Statement

**Richland County**, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Wisconsin Department of Transportation (WisDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

### Title VI Plan Elements

**Richland County's** Title VI plan includes the following elements:

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

*Note: Additional materials will be attached, if required.*

## TITLE VI Notice to the Public

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

<p style="text-align: center;">Notifying the Public of Rights Under Title VI</p> <p style="text-align: center;"><b>Richland County, Wisconsin</b></p> <ul style="list-style-type: none"><li>✓ <b>Richland County</b> 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 <b>Richland County</b>.</li><li>✓ For more information on <b>Richland County's</b> civil rights program, and the procedures to file a complaint, contact 608-647-2197, (TTY 608-647-2197); email <a href="mailto:victor.vlasak@co.richland.wi.us">victor.vlasak@co.richland.wi.us</a> ; or visit our administrative office at 221 W. Seminary Street, Richland Center, WI 53581. For more information, visit <a href="http://www.co.richland.wi.us">www.co.richland.wi.us</a></li><li>✓ 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.</li><li>✓ If information is needed in another language, contact 608-647-2197.</li><li>✓ <i>Si se necesita informacion en otro idioma de contacto, 608-647-2197.</i></li></ul>
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Richland County's Notice to the Public is posted in the following locations: (*check all that apply*)

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

## Title VI Complaint Procedure

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

- X Agency website, either as a reference in the Notice to Public or in its entirety
  - X Hard copy in the central office
  - X Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
  - X Other: at the Aging and Disability Resource Center of Eagle Country – Richland Center Office
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Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Richland County may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Richland County investigates complaints received no more than 180 days after the alleged incident. Richland County will process complaints that are complete.

Once the complaint is received, Richland County 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.

Richland County has 60 days to investigate the complaint. If more information is needed to resolve the case, the county may contact the complainant.

The complainant has 30 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 30 business days, the county can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

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

- ✓ If information is needed in another language, then contact 608-647-2197
- ✓ *Si se necesita informacion en otro idioma de contacto, 608-647-2197.*

## Title VI Complaint Form

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

- X Agency website, either as a reference in the Notice to Public or in its entirety
- X Hard copy in the central office
- X Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- X Other: at the Aging and Disability Resource Center of Eagle Country – Richland Center Office

<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

<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.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<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:

Richland County  
Victor Vlasak, County Clerk  
181 W. Seminary Street  
Richland Center, WI 53581

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

<b>Subrecipient:</b> Richland County		
<b>Contact Person:</b> Victor Vlasak	<b>Signature:</b>	<b>Date:</b> 8-19-2014

**Check One:**

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

\_\_\_\_\_

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

\_\_\_\_\_

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## Public Participation Plan

<b>Subrecipient:</b> Richland County, Aging and Disability Resource Center			
<b>Contact Person:</b>	Roxanne Klubertanz-Gerber	<b>Signature:</b>	Roxanne Klubertanz-Gerber
			<b>Date:</b> 4/13/2020

### Strategies and Desired Outcomes

To promote inclusive public participation, Richland County will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

### Documented Public Outreach

The direct public outreach and involvement activities conducted by Richland County are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to WisDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Event Date	Richland County Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes (Meeting size and format, location, Number of Attendees, etc.)
Annually	Roxanne Klubertanz-Gerber/Linda Batten	Radio program	Spring WRCO local radio morning show	Radio	50,000 broadcast listening area
5-9-2018	Roxanne Klubertanz-Gerber/Linda Batten	Regional Planning 5 yr transp. planning Meeting	Public notice in paper two weeks prior. Invitation mailed month prior. Posted at meal sites and on radio	Meeting, public information gathering and online survey	Open to public, ADRC offices, Approx. 20 attendees
9/26/2019	Roxanne Klubertanz-	Pizza and Volunteers	Posters at meal site and senior center 2-3 weeks prior to event, ads in the	Presentation for new volunteers &	At Phoenix Center – 3 ppl attended

	Gerber/Linda Batten		Richland Observer and on WRCO radio	bus for people to ride the lift	
3/12/2019	Linda Batten	Where do you Want to Go presentation	Posters at apartment building 2-3 weeks prior to event	Presentation & bus Information for people to ride	At Ridgeview Commons site, approx 5 ppl.
5/17/2019	Linda Batten	Where do you Want to Go presentation	Posters at apartment building 2-3 weeks prior to event	Presentation & bus Information for people to ride	At Richland Hills 14 ppl
7/12/2019	Roxanne Klubertanz-Gerber	Ride the bus to upcoming events	Posters at meal site 2 weeks prior	Presentation & bus for people to ride the bus for free to upcoming events	WRCO 5,000 ppl
7/31/2019	Roxanne Klubertanz-Gerber/Linda Batten	Transportation listening session	Poster at mealsite	Presentation of services	Richland County HHS Community Services Bldg. approx 25 ppl
6-12-2019	Roxanne Klubertanz-Gerber Linda Batten	53.10 Public Forum	Observer: 6/6/2019; posted at meal sites and community bulletin boards	Presentation of services	Richland Center HHS Community Services Building. Observer circulation 3,400; 9 attendees
11/19/2019	Roxanne Klubertanz-Gerber/Linda Batten	Advertisement for services	11/7/2019 and 11/8/2019	Richland Observer and WRCO morning show for free bus ride to Veterans Conference	Circulation of 3400 Broadcast of 50,000 listening area
11/15/2019	Roxanne Klubertanz-Gerber/Linda Batten	Dementia Live/discussion of transportation resources	Regional Dementia Care Specialist	Dementia Live event	40 ppl attended
12/12/2019	Roxanne Klubertanz-Gerber/Linda Batten	Steering Into the Skid Play	11/30/2019 and 12/5/2019	Observer ad for play and free transportation to play, booth at play with resources	107 ppl attended
2/27/2020	Linda Batten	OCI education	Went with GWAAR to meet with OCI to discuss insurance issues	Presentation of Volunteer driver insurance concerns	Approx 6 attended
4/9/2020	Roxanne Klubertanz-Gerber	Transportation availability	4/9/2020 Observer ad	Notice of services available during COVID crisis	Circulation of 3400



## Language Assistance Plan

### Plan Components

As a recipient of federal US DOT funding, Richland County is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

**Limited English Proficient (LEP):** Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Most individuals in Wisconsin read, write, speak and understand English. There are some individuals for whom 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, or "LEP."

Richland County's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

*Item #1:* The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

### Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, Richland County has conducted a *Four Factor Analysis*<sup>1</sup> of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

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<sup>1</sup> DOT LEP guidance <https://www.civilrights.dot.gov/page/dots-lep-guidance>

## LEP Four Factor Analysis

- **Factor 1: Demography:** The Census and American Community Survey (ACS) Data<sup>2</sup> numbers provided via the Wisconsin DOT website for Richland County do not show a population that meets the Safe Harbor Threshold requirements. See numbers below.

- **Richland County, Wisconsin**  
Estimate Margin of Error  
Total: 16,894 +/-38  
Speak only English 16,040 +/-180  
**Spanish or Spanish Creole: 364 +/-103**  
Speak English "very well" 227 +/-95  
Speak English less than "very well" 137 +/-32 (Safe Harbor Threshold: .0081)  
**French (incl. Patois, Cajun): 31 +/-21**  
Speak English "very well" 27 +/-20  
Speak English less than "very well" 4 +/-5  
**Italian: 5 +/-7**  
Speak English "very well" 3 +/-4  
Speak English less than "very well" 2 +/-4  
**German: 264 +/-110**  
Speak English "very well" 246 +/-106  
Speak English less than "very well" 18 +/-15 (Safe Harbor Threshold: .001)  
**Other West Germanic languages: 116 +/-77**  
Speak English "very well" 106 +/-75  
Speak English less than "very well" 10 +/-8 (Safe Harbor Threshold: .0005)  
**Scandinavian languages: 18 +/-17**  
Speak English "very well" 18 +/-17  
Speak English less than "very well" 0 +/-15  
**Russian: 8 +/-7**  
Speak English "very well" 6 +/-5  
Speak English less than "very well" 2 +/-3  
**Polish: 12 +/-9**  
Speak English "very well" 9 +/-8  
Speak English less than "very well" 3 +/-4  
**Other Slavic languages: 11 +/-8**  
Speak English "very well" 6 +/-5  
Speak English less than "very well" 5 +/-7  
**Other Indic languages: 5 +/-6**  
Speak English "very well" 5 +/-6  
Speak English less than "very well" 0 +/-15  
**Hmong: 4 +/-9**  
Speak English "very well" 0 +/-15  
Speak English less than "very well" 4 +/-9  
**Tagalog: 16 +/-17**  
Speak English "very well" 12 +/-13  
Speak English less than "very well" 4 +/-6

Even without meeting the Safe Harbor Threshold requirements Richland County is dedicated to providing transportation service to anyone meeting the Richland County Public Transportation program requirements.

- ✓ **Factor 2: Frequency:** Richland County transportation staff has little to no contact with any LEP population. If a person that has a communication disadvantage comes into the Aging and Disability Resource Center and would like to discuss transportation there are several provision in place to ensure effective communication.

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<sup>2</sup> The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

- ✓ **Factor 3: Importance:** The Aging and Disability Resource Center mission is to help people age-in-place. Transportation is a large part of people maintaining their independence. Anyone needing to communicate a transportation need will find the Aging and Disability Resource Center to be welcoming and accommodating.
  
- ✓ **Factor 4: Resources and Costs:** The Aging and Disability Resource Center contracts with Language Line which has interpreter services available for 20 languages. There are posters in the ADRC reception area that a person can point to the desired language. There are also Spanish interpreters contracted with the Richland County Health & Human Services department which are available to the ADRC transportation program. Even though the LEP populations in Richland County do not meet the Safe Harbor Thresholds for requirement to convert documents or provide outreach the ADRC is still having brochures and posters for the Richland County Public Transportation program converted to Spanish and distributed at the local Mexican Grocery store and through area farmers using seasonal workers.

In addition to the *Four Factor Analysis (listed above as item #1)*, Richland County will address the following elements:

*Item #2:* A description of how language assistance services are provided by language

The Aging and Disability Resource Center contracts with Language Line which has interpreter services available for 20 languages. There are also Spanish interpreters contracted with the Richland County Health & Human Services department which are available to the ADRC transportation program.

*Item #3:* A description of how LEP persons are informed of the availability of language assistance service

There are Language Line posters in the ADRC reception area that a person can point to the desired language. This is also stated in the program brochure and posted in the program vehicles.

*Item #4:* A description of how the language assistance plan is monitored and updated

As census data changes and the Civil Rights Compliance plan is updated it is monitored how the demographics of Richland County are changing. As the needs of the population change the services available will match those needs.

Item #5: A description of how employees are trained to provide language assistance to LEP persons

A review of the Language Line program is done on a regular basis.

*And, any additional information deemed necessary.*

Even though the LEP populations in Richland County do not meet the Safe Harbor Thresholds for requirement to convert documents or provide outreach the ADRC is still having brochures and posters for the Richland County Public Transportation program converted to Spanish and distributed at the local Mexican Grocery store and through area farmers using seasonal workers.

### **Minority Representation Information**

#### **A. Minority Representation Table**

*The table below depicts Richland Counties committee related to transit: the Transportation Coordinating Committee. The demographic data in the table below indicates the participation of minorities on committees and councils is reflective of the demographic makeup of Richland County.*

Body	Caucasian	Hispanic	African American	Asian American	Native American
Population					
Total population of Richland County: 18,021	97.5%	0%	0%	0%	0%
Transportation Coordinating Committee	100%	0%	0%	0%	0%

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

*Richland County understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, Richland County encourages participation of all its citizens. As vacancies on boards, committees and councils become available, Richland County will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, Richland County will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, Richland County will use/create ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and providing transportation and child care, if needed for its members.*

*Minority Representation Data Collection Form*

**Transportation Coordinating Committee**

Date: 6-10-2020

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Dear Member,

As Richland County is a recipient of federal funds, we are 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 Richland County 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 Richland County, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. 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.

