

2023-2025

TITLE VI PROGRAM

CIVIL RIGHTS ACT OF 1964
49 CFR Part 21

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.



www.shorelinemetro.com

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A. Summary

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. § 2000d).

Shoreline Metro is a department of the City of Sheboygan. Shoreline Metro and the City may be used interchangeably in this document as they are one in the same entity. Shoreline Metro and the City of Sheboygan's Title VI Program requirements are similar and include federal requirements when using and receiving federal funds to provide services.

Shoreline Metro is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. on the basis of:

- Age
- Ancestry
- Color
- Gender
- Gender Expression
- Gender Identify
- Genetic Information
- Marital Status
- Medical Condition
- Mental Disability
- Military and Veteran Status
- National Origin
- Physical Disability
- Sex (includes pregnancy, childbirth, breastfeeding and/or medical conditions)
- Sexual Orientation

The City of Sheboygan's Mission Statement provides: "The City of Sheboygan is dedicated to providing residents, the business community and visitors with fiscally-responsible municipal services in an effective and responsive manner to meet the needs of our diverse community."

Title VI of the Civil Rights Act of 1964 (Title VI) is a federal law which provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Civil Rights Restoration Act of 1987 makes clear that a local governmental entity that accepts Federal financial assistance may not engage in the type of discrimination prohibited by Title VI. Title VI applies to recipients *and* sub-recipients of Federal financial assistance.

This document is intended to outline the City's plan to ensure compliance with its obligations under Title VI.

B. Introduction

Title VI and Related Authorities

- **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, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”
- **The Civil Rights Restoration Act of 1987**, P.L. 100-209, provides clarification of the original intent of Congress in Title VI of the 1964 Civil Rights Act, Title IX of the Educational Amendments Act of 1972, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. It makes clear that, among other things, a local governmental entity that accepts Federal financial assistance may not engage in the type of discrimination prohibited by Title VI.
- **Executive Order 12898** (issued February 11, 1994) addresses Environmental Justice regarding minority and low-income populations. Agencies must develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.
- **Executive Order 13166** (issued August 16, 2000) addresses access to services for persons with Limited English Proficiency (LEP). Agencies are directed to evaluate services provided and implement a system that ensures that LEP persons are able to meaningfully access the services provided, consistent with, and without unduly burdening the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to programs, services and information to their LEP applicants and beneficiaries free of charge. Language barriers have the potential of preventing LEP persons from:
 - Obtaining services and information relating to local government programs, activities, and services.
 - Taking advantage of the transit system, which could affect their jobs and social opportunities.
 - Understanding the benefits to which they are entitled when their home or business is acquired through eminent domain.

Limited English Proficiency (LEP)

Limited English Proficient persons refer to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well or not at all.

LEP person are entitled to language assistance under Title VI of the Civil Rights Act of 1964, and federal assistance recipients shall take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities.

City Governance

The City is governed by an elected Council of ten members. The City is a full-service city with over 450 employees and ten departments.

C. Title VI Statement

Shoreline Metro and the City of Sheboygan, in accordance with Title VI of the Civil Rights Act of 1964, is committed to operating its programs, activities, and services in such a way that no person is excluded from participation in or denied the benefits of a program, activity, or service based on their race, color, national origin, sex, disability, or age. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Shoreline Metro or an appropriate state or federal agency. The City's complaint process and complaint forms are included in Appendix B.

Shoreline Metro's objective is to:

- Ensure that its programs, activities, and services are provided without regard to any protected status;
- Promote the full and fair participation of all affected populations in decision making;
- Prevent the denial, reduction, or delay in benefits related programs, activities, and services that benefit minority populations or low-income populations; and
- Ensure meaningful access to programs, activities, and services for persons with Limited English Proficiency.

Shoreline Metro is committed to complying with the Title VI requirements for all programs, activities, and services delivered to the public. This Title VI Program (Program) serves as a guide and reflection of the City's commitment to preserving the civil rights for all individual and group beneficiaries of City programs and services.

D. Title VI Coordinator

The City's Title VI Coordinator is the City Administrator while Shoreline Metro's Title VI Coordinator is the Director of Transit & Parking. They are responsible for the respective Title VI Programs. The Title VI Coordinators provide guidance and technical assistance on Title VI matters and has overall program responsibility for preparing reports and developing program procedures.

Additional assistance to the Title VI Coordinators is provided by the City Attorney, Human Resources Director (e.g., personnel and job applicant issues), the Federal Transit Administration, and other city staff.

Shoreline Metro's Title VI Coordinator's responsibilities include:

- a. Reviewing any future guidance, including Treasury Department directives, regarding LEP persons and taking all necessary action to revise this Program in compliance with future guidance to ensure that LEP persons have meaningful access to the City's programs, services, and activities;
- b. Ensuring the Program, including any revisions, is implemented;
- c. Considering the need for language service for LEP persons when proposing the budget to the Common Council pursuant to Sheboygan Municipal Code § 2-904;
- d. Considering the need for language service for LEP persons when the City conducts programs, services, and activities;
- e. Maintaining a complaint log regarding Title VI complaints;
- f. Promptly processing and resolving Title VI complaints;
- g. Promptly informing the Federal Transit Administration and any other applicable Federal Agency of any complaints of discrimination on the grounds of race, color, or national origin, and limited English proficiency;
- h. Promptly providing documentation of any administrative agency's or court's findings of the City's non-compliance with Title VI to the Federal Transit Administration and efforts to address

- the non-compliance;
- i. Cooperating with any enforcement or compliance review activities regarding Title VI;
- j. Promptly resolving areas of deficiency;
- k. Ensuring that Title VI requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination;
- l. Coordinating the development and implementation of staff training regarding the Title VI program; and
- m. Developing and coordinating Title VI information for public dissemination, including, where appropriate, in languages other than English.

Shoreline Metro's Title VI Coordinator is the Director of Transit & Parking.

Derek Muench
 Director of Transit & Parking
 Sheboygan, WI 53081
 Phone: (920) 459-3140
 E-Mail: Derek.Muench@shorelinemetro.com

E. Title VI Outreach

Title VI information posters shall be prominently and publicly displayed in all Shoreline Metro facilities and on revenue vehicles. The name of the Title VI coordinator is available on the Shoreline Metro website, at www.shorelinemetro.com. Additional information relating to nondiscrimination obligation can be obtained from the Shoreline Metro Title VI Coordinator. During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Shoreline Metro expectations to perform their duties accordingly. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix G).

Customers may access the entire Title VI program for Shoreline Metro at <https://shorelinemetro.com/rider-services/know-your-rights/> or the City's Program at <https://www.sheboyganwi.gov/?s=title+vi>.

F. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Shoreline Metro where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

G. Record Keeping

The Title VI Coordinator will maintain all permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of Shoreline Metro Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

H. Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, national origin, sex, disability, or age by Shoreline Metro or the City may file a Title VI complaint by completing and submitting the Title VI Complaint Form. Complaints received within 180 days of the alleged incident will be investigated

timely and accordingly. Shoreline Metro will process complaints that are complete.

Once the complaint is received, Shoreline Metro and the City will review it to determine if the City has jurisdiction. The complainant will receive an acknowledgement letter informing her or him whether the complaint will be investigated by the City.

The City will make every reasonable effort to complete its investigation of the complaint within 14 days. If more information is needed to resolve the complaint, the City may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the City may administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she or he will issue one of two 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. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains—to the extent permitted by law—whether any disciplinary action, additional training, or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the closure letter or the LOF to submit a written statement of her/his intent to appeal to the City's Title VI Coordinator. Appeals will be heard by the City's Licensing, Hearings, and Public Safety Committee.

A person may also file a complaint directly with an appropriate state or federal agency.

Complaints may be filed electronically with Shoreline Metro at <https://shorelinemetro.com/about/file-a-complaint/> or by mail to:

Shoreline Metro
Attn: Director of Transit & Parking
608 S Commerce Street
Sheboygan, WI 53081

NOTE: Shoreline Metro encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the Complaint after it is Submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Shoreline Metro will be directly addressed by the SHORELINE METRO. SHORELINE METRO shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, SHORELINE METRO shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

How will the Complainant be Notified of the Outcome of the Complaint?

Shoreline Metro will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from Shoreline Metro, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by Shoreline Metro, a written response will be drafted subject to review by the City's attorney. If appropriate, the City attorney may administratively close the complaint. In this case, Shoreline Metro will notify the complainant of the action as soon as possible.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following office:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

I. Limited English Proficiency (LEP) Plan

Introduction and Purpose

This LEP Four Factor Analysis and Language Assistance Plan has been prepared to meet Federal Transit Administration (FTA) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin. As a subrecipient of FTA funds, Shoreline Metro has pledged to take reasonable steps to provide meaningful access to its transit services for persons who either (1) do not speak English as their primary language, and/or (2) have a limited ability to read, speak, write or understand English. The FTA refers to these individuals as Limited English Proficient (LEP) persons.

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 federal 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, including Shoreline Metro, which receives federal assistance through the U.S. Department of Transportation (USDOT).

The USDOT's FTA Office of Civil Rights publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to LEP Persons – A Handbook for Public Transportation Providers" was utilized in the preparation of this plan.

Summary and Contents

Shoreline Metro has developed this *LEP Four Factor Analysis and Language Assistance Plan* to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by the

transit operation. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and/or have limited ability to read, speak, write or understand English.

Contents of the plan include the following:

- A needs assessment based on the four-factor analysis;
- How to identify LEP persons who may need language assistance;
- Identification of ways in which language assistance may be provided;
- Identification of staff training that may be required;
- Procedures to notify LEP persons that assistance is available; and
- Procedures to monitor and update the plan.

LEP Needs Assessment: The Four Factor Analysis

In order to prepare this plan, Shoreline Metro completed the United States Department of Transportation (USDOT) four factor LEP analysis, which assesses the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of Shoreline Metro.
2. The frequency with which LEP persons come into contact with Shoreline Metro programs, activities or services.
3. The nature and importance of programs, activities or services provided by Shoreline Metro in the lives of LEP persons.
4. The resources available to Shoreline Metro for LEP outreach, as well as the costs associated with that outreach.

A summary of the results of the Shoreline Metro four factor analysis is as follows:

FACTOR #1: The number of proportions of LEP persons eligible to be served or likely to be encountered by a program, activity or service of Shoreline Metro

Sheboygan MPO staff reviewed data from the *2016 – 2020 American Community Survey (ACS)*, and determined that 8,226 persons age 5 and older in the Shoreline Metro transit service area (Cities of Sheboygan and Sheboygan Falls and the Village of Kohler) spoke a language other than English; this amounted to about 15.1 percent of the entire service area population age 5 and older (a population of 54,420). Within the transit service area, some 3,262 persons (6.0 percent) had limited English proficiency; that is, they speak English less than “very well.” Of those persons with limited English proficiency, 1,003 (1.8 percent) spoke Spanish, 348 (0.6 percent) spoke other Indo-European languages, 1,806 (3.3 percent) spoke Asian and Pacific Islander languages (primarily Hmong), and 105 (0.2 percent) spoke other languages. Some 697 of 24,779 households in the transit service area (2.8 percent) were considered linguistically isolated households. The Shoreline Metro transit service area is above the “Safe Harbor” threshold of 5 percent or 1,000 persons within any LEP group speaking a given language in the areas of speakers of Spanish and Asian and Pacific Islander languages (primarily Hmong).

Table 1 shows a breakdown of LEP persons and linguistically isolated households for each census tract in the transit service area from the *2016 – 2020 ACS*. Table 1 indicates that Census Tract 3 had over 700 LEP persons,

while Census Tract 10 had between 500 and 600 LEP persons. Census Tracts 5 and 8 each had between 300 and 400 LEP persons. In addition, two Census Tracts (2.01 and 107) had between 200 and 300 LEP persons. Census Tract 3 had the largest percentage of LEP persons (10.7 percent), followed by Census Tracts 5 (10.1 percent), 2.01 (8.6 percent), and 10 (8.4 percent).

Table 1 also shows that Census Tract 3 had the largest number of linguistically isolated households (217), while three Census Tracts (2.01, 8 and 10) each had between 50 and 100 linguistically isolated households. Census Tract 2.01 had the largest percentage of linguistically isolated households (8.2 percent), followed by Census Tracts 3 (7.0 percent), and 8 (4.2 percent).

Table 1 indicates that in regard to LEP persons, Hmong was a wholly or partially dominant language in seven Census Tracts, while Spanish was also a wholly or partially dominant language in six Census Tracts, Hmong and Spanish were equally dominant in one Census Tract, other Indo-European languages were dominant in one Census Tract, and other languages were dominant in one Census Tract. Table 1 also indicates that in regard to linguistically isolated households, Hmong was the dominant language in eight Census Tracts, while Spanish was the dominant language in six Census Tracts, and other languages were dominant in one Census Tract. One Census Tract had no linguistically isolated households.

Table 1 Limited English Proficient (LEP) Persons and Linguistically Isolated Households 2016 - 2020 American Community Survey (ACS)						
Census Tract	LEP Persons		Predominant Language	Linguistically Isolated Households		Predominant Language
	Number	Percentage		Number	Percentage	
1	158	5.3%	Hmong	12	1.0%	Hmong
2.01	205	8.6%	Hmong	83	8.2%	Hmong
2.02	197	4.7%	Spanish	23	1.2%	Hmong
3	716	10.7%	Hmong	217	7.0%	Hmong
4	144	3.3%	Hmong	49	2.3%	Hmong
5	309	10.1%	Hmong	40	2.5%	Spanish
8	359	7.4%	Spanish	81	4.2%	Spanish
9	146	3.0%	Spanish	25	1.1%	Spanish
10	564	8.4%	Hmong	74	2.6%	Hmong
11	112	3.3%	Spanish/Hmong	12	0.8%	Spanish
106.01	67	1.3%	Other	33	1.3%	Other
106.02	142	3.6%	Spanish	49	2.6%	Spanish
107	233	2.9%	Spanish	4	0.1%	Hmong
108	82	2.5%	Hmong	2	0.1%	Spanish
109	8	0.3%	Spanish	0	0.0%	NA
114	104	4.3%	Indo European	15	1.2%	Hmong

Source: U.S. Bureau of the Census, *2016 - 2020 American Community Survey* (Tables B16004 and S1602), 2022; and Bay-Lake Regional Planning Commission, 2022.

Map 1 shows the degree of LEP persons in the various Census Tracts of the Shoreline Metro transit service area (according to the 2016 – 2020 ACS), along with the Shoreline Metro route structure.

Map 2 shows the degree of linguistically isolated households in the various Census Tracts of the Shoreline Metro transit service area (according to the 2016 – 2020 ACS), along with the Shoreline Metro route structure.

FACTOR #2: The frequency with which LEP persons come into contact with Shoreline Metro programs, activities or services.

The LEP populations that Shoreline Metro primarily works with mostly speak Spanish and Hmong. Both Spanish and Hmong speaking passengers are primarily located in Census Tracts that surround Sheboygan's central business district, as well as in most other Census Tracts within the City of Sheboygan. These passengers mainly use transit service for school, shopping, work and personal business, with medical and social/recreational trip purposes also being common. Shoreline Metro bus drivers have weekly contact with passengers who speak both languages. Shoreline Metro transit services provide an important link to these groups.

FACTOR #3: The nature and importance of programs, activities or services provided by Shoreline Metro in the lives of LEP persons.

Shoreline Metro considers transit to be an important and essential service for many people living in the transit service area. Shoreline Metro's overall passenger numbers from January 1, 2021, through December 31, 2021, indicate that the transit operation had higher ridership than it did for the same period in 2020. From January 1, 2020, through December 31, 2020, Shoreline Metro had 373,021 unlinked trips, and from January 1, 2021, through December 31, 2021, Shoreline Metro had 420,503 unlinked trips, an increase of 13.2 percent. Shoreline Metro does not track LEP passengers separately.

Services provided by Shoreline Metro that are most likely to encounter LEP persons are the fixed-route transit system which serves the general public, and the demand response paratransit system (including ADA paratransit), which serves primarily elderly and disabled persons.

FACTOR #4: The resources available to Shoreline Metro for LEP outreach, as well as the costs associated with that outreach.

Shoreline Metro has a budget for marketing, a portion of which involves marketing to or communicating with LEP persons in their language about transit services that are available to them. This may include funding for translation services, brochures, flyers, posters, newspaper advertising, radio advertising, website improvements, etc.

Shoreline Metro has access to some Spanish and Hmong speaking staff within its driver pool. Shoreline Metro will also have access to copies of the language identification guide "I Speak" pamphlets from the U.S. Department of Justice website for use in determining an unknown language.

Based on the above LEP needs assessment and four factor analysis, Shoreline Metro developed its LEP language assistance plan as outlined in the following sections.

How Shoreline Metro Staff May Identify an LEP Person who needs Language Assistance

As stated above, data from the 2016 – 2020 American Community Survey (ACS) show that Spanish and Hmong speaking LEP persons are the primary groups requiring language assistance. This information can also be used to identify concentrations of LEP persons within the service area.

Higher percentages of LEP persons can also be identified more accurately by Census Tracts, as was shown in Map 1. In general, there are higher populations of LEP persons in the City of Sheboygan, particularly on the north, northwest, west, southwest and south sides of the city, as well as in two Census Tracts adjacent to the central business district. Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures.

There are several other measures that can be taken to identify persons who may need language assistance, including the following:

- Examination of records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When Shoreline Metro sponsors open houses, public meetings or other events, set up a sign-in table and have a staff member greet and briefly speak with each attendee, in order to informally gauge each attendee's ability to speak and understand English.
- Have language identification flashcards from the U.S. Bureau of the Census available at Shoreline Metro events near the registration table. Persons who identify themselves as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but this will assist Shoreline Metro in identifying language assistance needs for future events.
- Vehicle operators and other front-line staff (such as dispatchers and ride schedulers) will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted in the third quarter of each year.

Language Assistance Measures

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Shoreline Metro staff will respond to LEP persons, whether in person, by telephone or in writing, including the following:

- The Shoreline Metro Title VI Policy and LEP Language Assistance Plan will be posted on the Shoreline Metro website, www.shorelinemetro.com.
- Shoreline Metro has added an online translation service to its website, and will include updates to this service on its website if and when they become available.
- The Title VI Complaint form and Contact Form on the website can be translated to accommodate LEP individuals.
- When there is a rapid need for an interpreter, in person or on the telephone, Shoreline Metro staff will work to determine the language of the LEP person and then access local interpreters as needed.
- A "How To" Guide specific for Spanish-speaking individuals is available in print or digital format.

Critical and vital documents will be translated into Spanish. These documents are defined as those documents without which a person would be unable to access services and include:

- Title VI Notice;
 - Posted on all revenue service vehicles;
 - Posted in all customer service locations;
 - Posted on the Shoreline Metro website;
- Interior bus notifications including route changes, detours and rider alerts;
- Interior bus notifications including safety and system information;
- ADA Paratransit application for services;
 - Posted on the Shoreline Metro website;
 - Available in print format as well;

Other service documents including route guides can be translated upon request from an individual.

Shoreline Metro has limited staff among the ranks of its drivers who speak Spanish or Hmong. As Shoreline Metro has openings in its driver pool and in its supervisory staff, attempts will be made to recruit staff with a working knowledge of Spanish or Hmong. Other techniques that may be employed as short-term measures may include asking for assistance from bilingual passengers, and hiring outside professionals to translate many of the items identified above.

Staff Training

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP Language Assistance Plan. Proper training of staff is a key element in the effective implementation of the LEP Language Assistance Plan. In order to ensure effective implementation of this plan, Shoreline Metro will schedule training at orientations (for new staff) and at periodic staff/driver meetings (for continuing staff) to review the following items:

- Information regarding Shoreline Metro's Title VI Policy and LEP Language Assistance Plan (including LEP responsibilities);
- Demographic data regarding the LEP population of the transit service area;
- Availability of translated literature regarding Shoreline Metro that can be accessed by LEP persons;
- Description of language assistance services offered to the public;
- Proper use of the language identification flashcards, and specific procedures to be followed when encountering an LEP person;
- Proper documentation of language assistance requests;
- Use of language translation services (office staff only); and
- The responsibility to notify the Transit Director about any LEP person's unmet needs.

At a minimum, these issues will be addressed at meetings on an annual basis. Some of the above issues may be addressed with drivers or with office staff, as needs are determined.

Procedures to Notify LEP Persons that Assistance is Available

There are several ways that Shoreline Metro plans to notify LEP persons in their own language that language assistance measures (through both oral and written communications) are available, including the following:

- At a minimum, public meeting notices and open house announcements will include a statement affirming that Shoreline Metro will make reasonable accommodations to translate pertinent materials into customer languages, or to provide an interpreter upon request.
- When Shoreline Metro schedules a meeting in which the target audience is expected to include LEP persons, then meeting notices, flyers, agendas, and other literature related to the meeting topic(s) will be printed in the alternative language(s) based on the known LEP population.
- Information will be sent to local organizations that work with LEP persons.
- Notices will be placed in alternative language publications and local access cable TV/radio programs (where they exist) advertising Shoreline Metro transit and paratransit services.
- "Vital documents" will be translated into Spanish and Hmong (where determined to be necessary).

Updating and Monitoring of the LEP Language Assistance Plan

This plan is designed to be flexible, and should be viewed as a work in progress. Therefore, it is important to: (1) consider whether new documents and services need to be made accessible for LEP persons; (2) monitor changes in demographics and types of services; and (3) update the LEP Language Assistance Plan when appropriate. At a minimum, Shoreline Metro will follow the Title VI Program update schedule in updating the LEP Language Assistance Plan. Each update should examine the following:

- How many LEP persons were encountered on an annual basis since the last plan?
- Are existing LEP language assistance activities meeting the needs of LEP persons? Have these activities been effective and sufficient to meet such needs?
- What is the current LEP population of the transit service area?
- Has there been a change in the types of languages where services are needed?
- Have available resources (such as technology, staff and finances) changed? Are Shoreline Metro's financial resources sufficient to fund needed language assistance programs?
- Were any complaints received concerning Shoreline Metro's failure to meet the needs of LEP persons?
- Do staff members understand the policies and procedures within the LEP Language Assistance Plan?
- Has Shoreline Metro fully complied with the goals of this LEP Language Assistance Plan?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to speakers of other languages. Feedback from the LEP community will be sought through outreach events and presentations to determine the effectiveness of the plan in serving the needs of LEP persons. Census data (involving future releases from the American Community Survey) will also be reviewed as they become available to determine changes in the LEP population.

Dissemination of the LEP Language Assistance Plan

Shoreline Metro will post this LEP Language Assistance Plan on its website, www.shorelinemetro.com.

This plan is also available at no cost in English upon request by telephone, fax, mail or in person. LEP persons may obtain copies or translations of the plan upon request.

Any questions or comments regarding this plan should be directed to:

Derek Muench, Director

Shoreline Metro

608 South Commerce Street

Sheboygan, WI 53081

Phone: (920) 459-3140

FAX: (920) 459-0231

E-Mail Address: Derek.Muench@shorelinemetro.com

I. Community Outreach

Shoreline Metro has developed a comprehensive public participation plan to notify the public regarding service changes, service area changes, and changes in the fare structure. Shoreline Metro appreciates and encourages public participation efforts from citizens living within the current service area and beyond.

Notifications:

Shoreline Metro publishes public notices in a variety of ways. Written communications are posted in the local newspapers (when applicable), on the Shoreline Metro website, the Shoreline Metro Facebook page, and internally on all Shoreline Metro revenue vehicles. Capital projects are published in the classified section of the *Sheboygan Press* whenever Shoreline Metro purchases capital projects using state or federal funds.

Press releases are issued for public input sessions for significant route revisions, changes in service, or fare increases. Public input sessions and hearings are hosted by Shoreline Metro on a per-need basis, usually in conjunction with activities provided through route planning by the Sheboygan Metropolitan Planning Organization (MPO), Bay-Lake Regional Planning Commission.

Postings are made at least thirty (30) days prior to the date of the public input session. Shoreline Metro also allows for at least a thirty (30) comment period on capital purchases or announced service changes before implementation.

Public input attendance and suggestions are documented in conjunction with the input session. Suggestions, ideas and comments are considered based:

- 1) Feasibility of project;
- 2) Financial capacity of Shoreline Metro; and
- 3) Practicality of implementation (greatest good for the majority),

Comments are evaluated based on these factors and incorporated based on evaluation of the criteria.

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

- *SHORELINE METRO has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities.*

- *Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan).*
- *Transit Commission meetings are open to the public and public participation is encouraged.*
- *The Transportation Improvement Program (TIP) is a planning document that addresses transportation projects and programs, including public transportation. The TIP is prepared and published by Bay-Lake Regional Planning Commission. Public participation and comment is also encouraged. (Please see Appendix B for the Bay-Lake Regional Planning Commission's Public Participation Plan for the Sheboygan MPO).*
- *Shoreline Metro has a complaint procedure process that encourages customer comments on issues, concerns or questions about Shoreline Metro's services.*

Federal transit law, as amended by "Bipartisan Infrastructure Law (BIL 2021), requires that projects selected for under the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) be derived from a coordinated plan. The coordinated plan (last updated in 2020) involved extensive public outreach and involvement. The next full coordinated plan will be updated in 2024.

J. Service Standards

Title VI of the Civil Rights Act of 1964, as amended, as well as subsequent legislation and regulation, seeks to ensure that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The FTA is the agency that provides oversight to Shoreline Metro's Title VI program.

In October of 2012, the FTA released the most recent update to its Title VI Circular. This circular presents guidance and instructions for recipients of Federal financial assistance to comply with current U.S. Department of Transportation (DOT) Title VI regulations. Changes made in this revision include the addition of several requirements, including the adoption of specific service standards and policies for providers of fixed-route public transportation services, and the policy definitions of what constitutes a major service change, disproportionate burden and disparate impact. Moreover, the updates require the monitoring of these service standards and policies for compliance with Title VI provisions, including disparate-impact and disproportionate-burden effects, with consideration, awareness, and the monitoring results made by the Director of Transit & Parking for the City of Sheboygan and/or the Transit Commission.

TABLE 2 – Fixed Route Service Standards			
FTA Standard	Shoreline Metro Term	Shoreline Metro Definition	Calculation
Vehicle Headway	Frequency/Time Between Buses	Maximum scheduled time interval between buses.	Weekday peak-period and day time hours maximum wait time between buses will be 30 minutes; weekday off-peak times and Saturday times maximum wait time between buses shall be 60 minutes.

On Time Performance (OTP)	On Time Performance	Percent adherence to scheduled service.	Routes shall remain on time 95% of the time during normal circumstances (exempting weather, detours, etc.). On time performance is considered up to 5 minutes after the posted pick up times and never ahead of the posted pick up times.
Service Availability	Population served by Shoreline Metro	Percent of a population living near a Shoreline Metro bus stop.	Population living within ¼ mile of a bus stop divided by the total population in the zone. Shoreline Metro has a standard of 90% (currently 96.5%).
Vehicle Load	Load Factor	Average trips provided per bus during one (1) service hour.	Load factors of 12.00 trips per hour under normal operating circumstances with expected trips per hour to be 11.00-13.00 on an average weekday.

These service standards are specifically mentioned in Shoreline Metro's *2021-2025 Transit Development Program (TDP)* and Chapter 5 of the Update to the *Year 2045 Sheboygan Area Transportation Plan (SATP)*, both prepared by the Bay-Lake Regional Planning Commission. Information on Shoreline Metro's *2021 – 2025 TDP*:

https://baylakerpc.org/download_file/view/1352/293

Shoreline Metro has also service policies for amenities and vehicles:

- Shoreline Metro will provide equitable distribution of transit shelters, maps and other resources in buses and at bus stops servicing all transit participating municipalities in the service area.
- Vehicles are assigned by ridership demand. Routes with higher ridership demands will be accommodated by 35 foot coaches with other routes utilizing 29 foot and 35 foot coaches.
- Shoreline Metro will make all its publications, service provisions, maps, policies and updates available on its website (www.shorelinemetro.com) and on its Facebook page (www.facebook.com/shorelinemetro).

TABLE 3 – Paratransit Service Standards			
FTA Standard	Shoreline Metro Term	Shoreline Metro Definition	Calculation
Vehicle Load	Load Factor	Average trips provided per bus during one (1) service hour.	Load factors of 2.5 trips per hour under normal operating circumstances with expected trips per hour to be 2.40 to 2.70 on an average weekday.
On Time Performance (OTP)	Schedule Adherence	Percent adherence to scheduled service.	Trips shall not pick up more than 15 minutes early or more than 15 minutes late with 95% of all trips provided within this window.

Shoreline Metro also has service goals that include:

- A denial rate of 0% (100% of all trips provided within service standards as outlined in the 2022 Paratransit Program for Shoreline Metro.
- Shoreline Metro will not provide lengthy trips (trip lengths of more than 60 minutes in duration) under normal circumstances (exempting weather, construction/detours, accidents, etc.).

Shoreline Metro has established policies for major service change, disparate impact, and disproportionate burden, as shown in Table 4 below:

TABLE 4 – Major Service Changes*		
Parameters	Shoreline Metro Term	Anticipated Service Change
Span	Change in span of service on a route or routes of 1-hour or more in a single fiscal year (calendar year).	No
Frequency	Change in revenue miles on a route or routes of more than 10% in a single fiscal year (calendar year).	No
Coverage/Availability	Change in availability of route service of more than 10% in a single fiscal year (calendar year).	No
Fares	Change in adult cash fare (increase or decrease).	No

*All major service changes require a public hearing and approval from the Transit Commission before implementation.

Appendix A – Title VI Policy

The Shoreline Metro Title VI Policy is displayed in all revenue vehicles, at both public facilities for passengers and customers to view and on the Shoreline Metro website, www.shorelinemetro.com. The policy is posted in both English and Spanish. The policy states:

"Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs & activities receiving Federal financial assistance. (42 U.S.C. Section 2000d).

Shoreline Metro is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the Shoreline Metro Title VI Coordinator.

For more information you may visit us at shorelinemetro.com & view the "Riders Rights" page by clicking on the Riders Services tab or you may call the Shoreline Metro Title VI Officer at 920.459.3285."

Further, no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the Shoreline Metro are expected to consider, respect, and observe this policy in their daily work and duties. Citizens wishing to file a Title VI complaint shall do so to the attention of the Director of Transit & Parking. In all dealings with citizens use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

Appendix B – Sheboygan MPO Public Participation Plan: 2020 Update (Bay-Lake Regional Planning Commission)

The *2020 Sheboygan MPO Public Participation Plan Update (September 2020)*. A link to this document can be found at:

https://baylakerpc.org/download_file/view/1178/240

Appendix C – Title VI Complaint Form

Section I				
Name:				
Address:				
Telephone (Home/Cell):		Telephone (Work):		
Email:				
Do you require an accessible format?	Large Print		Audio Tape	
	TTY/TDD		Other	
Section II				
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 filing:				
Have you obtained permission from this person?				
Please explain why you are filing for this person:				
Section III				
I believe the discrimination I experienced was based on (check all that apply): () race () color () national origin () sex () disability () age _____				
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.				
Section IV				
Have you previously filed a Title VI complaint with the City of Sheboygan?			Yes	No
Contact name:				
Telephone number:				
Section V				
Have you filed this complaint with any other federal, state or local agency or with any federal or state court?				
If yes, check all that apply:				
() Federal Agency:		() Federal Court:		
() State Agency:		() State Court:		
() Local Agency:		() Local Court:		
Please provide contact information for the person you spoke to at the above agency:				
Name:		Title:		
Agency:				
Address:				
Telephone:				

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below:

Signature

Date

This form is also available on the Shoreline Metro website at <https://shorelinemetro.com/about/file-a-complaint/>. This form (along with the print form) is available in Spanish.

The City of Sheboygan and Shoreline Metro operates without regard to race, color or national origin.

If you need assistance completing this form, contact the Director at Shoreline Metro at 920-459-3140 or via email at derek.muench@shorelinemetro.com.

Please submit this form in person or by mail to:

Shoreline Metro
Title VI Coordinator
608 S Commerce Street
Sheboygan, WI 53081

Appendix D – Racial Breakdown of Transit Commission

Shoreline Metro is governed by an authoritative Transit & Parking Commission consisting of nine (9) members, including three (3) elected Common Council members, the Mayor, two (2) City Department Heads, and three (3) Mayoral Appointees. Aldermen are appointed to one (1) year terms, and Mayoral Appointees are appointed to three (3) year staggered terms. The three (3) City Department Heads are standing appointments.

The Transit & Parking Commission meets bi-monthly on the third Tuesday of the month. Mayoral appointments have been traditionally local business owners or citizens with transit and parking interests. Some appointments have had an interest in local government and being involved in some capacity. Most appointments have been on a referral basis.

In the past, the Transit & Parking Commission had members of a minority class. Shoreline Metro does encourage women and minorities to apply. Here is the current racial breakdown of the Transit & Parking Commission:

Commission Member	White/ Caucasian	Black/African- American	Hispanic	Native American	Asian/Pacific Islander
Mayor	X				
Alderman – Chair of Finance & Personnel		X			
Alderman – Chair of Public Protection & Safety	X				
Alderman – Chair of Public Works	X				
Police Chief	X				
Planning Director	X				
Citizen Appointee #1	X				
Citizen Appointee #2	X				
Citizen Appointee #3	X				
Transit Director (ex-officio)	X				

TITLE VI NOTICE OF RIGHTS

The City of Sheboygan operates its programs and services without regard to race, color, national origin, sex, disability, or age in accordance with Title VI of the Civil Rights Act of 1964 and other state and federal laws. If you believe you have been subjected to discrimination in violation of state or federal law, you may file a written complaint with the City. Depending on the nature of your claim, you may also be able to file a complaint with a state or federal agency or with a state or federal court. For more information:

***Title VI Coordinator
608 S Commerce Street
Sheboygan, WI 53081
(920) 459-3140***



TITULO VI CONOZCA SUS DERECHOS

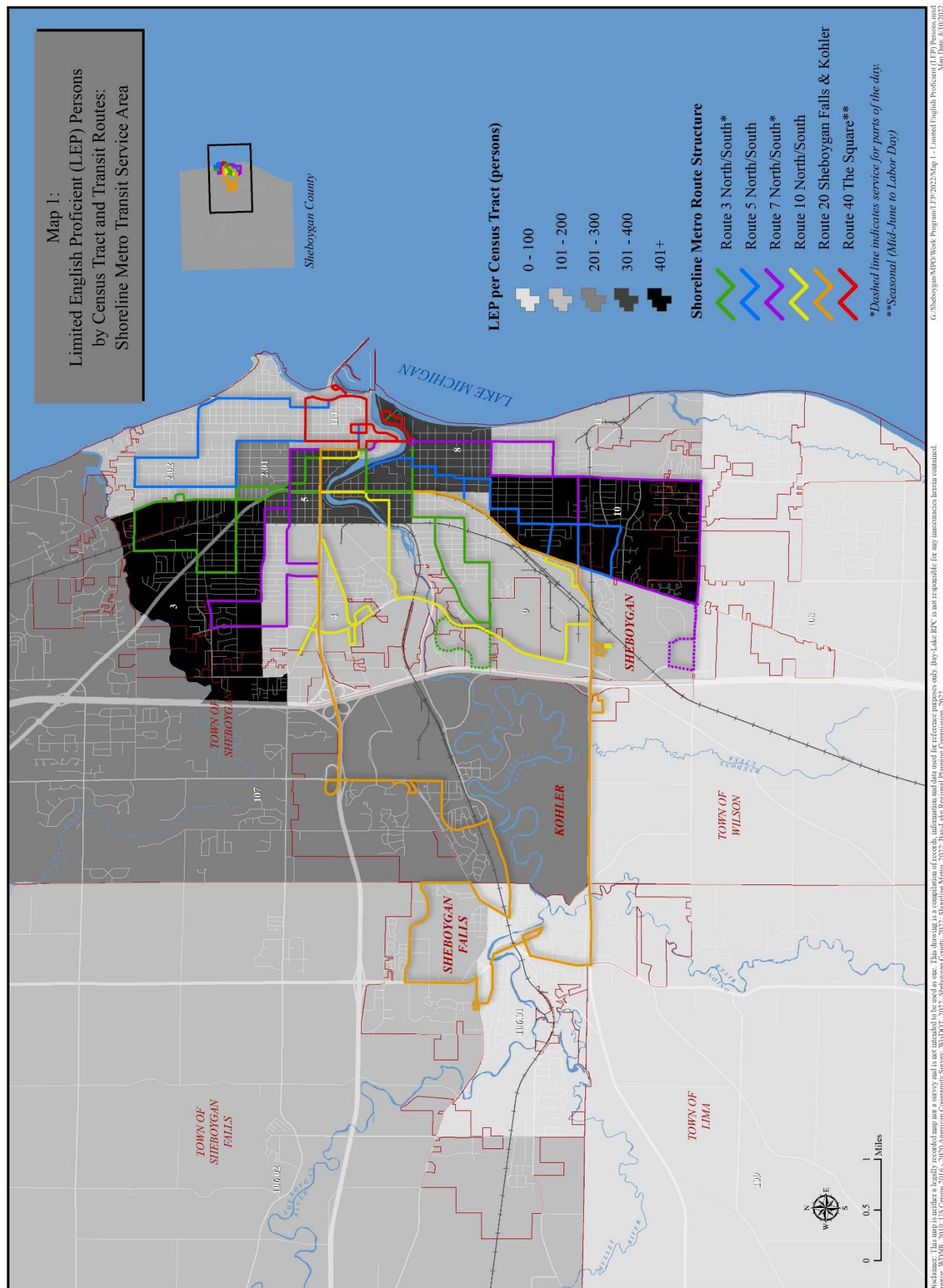
Shoreline Metro cumple con el Título VI de la Ley de Derechos Civiles de 1964, que “prohíbe la discriminación por motivos de raza, color u origen nacional en programas y actividades que reciben asistencia financiera federal. Específicamente, el Título VI establece que “ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o será objeto de discriminación en virtud de cualquier programa o actividad que reciba Asistencia financiera federal”. (42 USC Sección 2000d).”

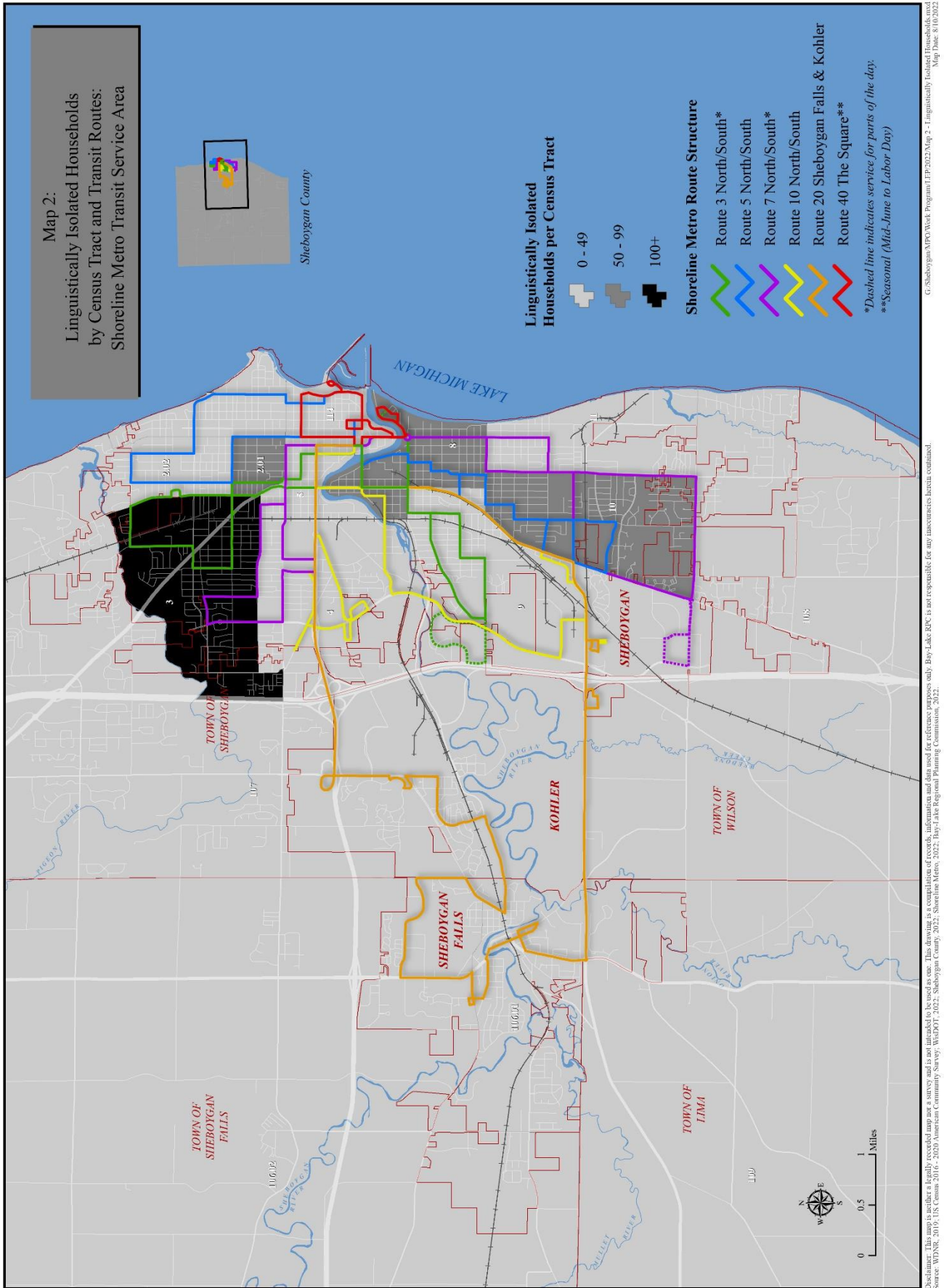
Cualquier persona que crea que él o ella, individualmente o como miembro de una clase específica de personas, ha sido objeto de discriminación por motivos de raza, color u origen nacional puede presentar una queja por escrito.

**Coordinador de Título VI
(920) 459-3140**



Appendix F – Limited English Proficient and Linguistically Isolated Households Maps





Appendix G - Timeline of Versions and Updates

Original Version	October 1999
First Update.....	April 2008
Second Update.....	July 2011
Third Update.....	June 2014
Fourth Update.....	November 2014
Fifth Update	January 2017
Sixth Update	January 2020
Seventh Update.....	May 2021
 Second Version.....	 December 2022

Appendix H – Acknowledgement of Receipt of Title VI Plan

Title VI of the Civil Rights Act of 1964 states: "No person shall, on the grounds of race, color, national origin, sex, disability, or age be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." 42 U.S.C. § 2000d.

Employees of the City of Sheboygan are expected to consider, respect, and observe this policy. Citizen questions or complaints shall be directed to Shoreline Metro's Title VI Coordinator.

I hereby acknowledge receipt of Shoreline Metro's Title VI Program. I hereby acknowledge having participated in training about Shoreline Metro's Title VI Program.

I have read Shoreline Metro's Title VI Program and am committed to ensuring that no person is excluded from participation in, or denied the benefits of programs, activities, or services delivered by the City of Sheboygan on the basis of race, color, or national origin, as protected by Title VI.

Signature

Print Name

Date