

2026-2028

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.sheboyganwi.gov

TABLE OF CONTENTS

A. Summary..... 3
B. Introduction 4
C. Title VI Statement..... 5
D. Title VI Coordinator 5
E. Title VI Outreach 6
F. Subcontracts and Vendors 7
G. Record Keeping 8
H. Title VI Complaint Procedures..... 8
I. Goals and Objectives9
J. Limited English Proficiency (LEP) Plan 10

APPENDICES

A. Title VI Policy 18
B. Title VI Complaint Form (English and Spanish) 20
C. Title VI Complaint Procedures (English and Spanish) 24
D. Title VI Complaint Tracking Form 26
E. Map of Limited English Proficiency in Sheboygan County 27
F. Language Line Identification Card 28
G. Title VI Staff Training Form 30

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).

The City of Sheboygan is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B, among other federal departments providing funding to subrecipients, and other nondiscrimination statutes and directives, 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, and other services, 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 municipality with over 450 employees and ten departments.

C. Title VI Statement

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 City of Sheboygan or an appropriate state or federal agency. The City's complaint process and complaint forms are included in Appendix B.

The City of Sheboygan'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.

The City of Sheboygan 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. The Title VI Coordinator provides 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 Coordinator is provided by the City Attorney, Human Resources Director (e.g., personnel and job applicant issues) and other city staff.

The City of Sheboygan'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 § 2-866;-
- 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. 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. 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.

The City of Sheboygan's Title VI Coordinator is the City Administrator.

Casey Bradley
City Administrator
Sheboygan, WI 53081
Phone: (920) 459-3315
E-Mail: casey.bradley@sheboyganwi.gov

E. Title VI Outreach

The City of Sheboygan will display the "Notice of Rights" (Appendix A) for public view at all City facilities with customer service counters and on the City's public website. The Notice states that the City will comply with Title VI, and ensures that no person—on the grounds of color, race, national origin, sex, disability, or age—will be excluded from the participation

in, be denied the benefits of, or be otherwise subjected to discrimination under any of the City's programs, activities, or services. The Notice is provided in English, Spanish, and Hmong.

The City is committed to ensuring that projects, activities, and services delivered by the City are sensitive to the various demographic backgrounds within the City. The City Public Participation Plan (PPP) is for use by the City to promote public involvement in the planning and decision-making process of projects, activities, and services.

As a recipient of Federal funding, the City is required to adhere to Title VI of the Civil Rights Act of 1964 and to integrate the PPP into its Title VI Program. This plan provides guidelines for involving the public to ensure that all groups are represented and their needs considered. The City is committed to ensuring it serves the residents and businesses of the City fairly, consistently, and in the most cost-efficient and appropriate manner within available resources.

The City will engage the community through the City's website, social media, and brochures placed at the library, community centers, public parks, and recreation areas within the City. City staff or a contracted non-English language interpreter are available upon request to attend community meetings to inform residents of the City's projects, activities, and services, and provide them an opportunity to express their input in a language in which they are comfortable communicating.

Appropriate techniques among the following will be used to inform, educate, and gain input from the public about the City's projects, services, and activities:

- Surveys or questionnaires - mail-in, online, telephone, personal interview
- Articles or press releases in appropriate publications
- Timely consultation with advisory committees
- Distribution of informal reports, flyers, or brochures
- Informal presentations at community forums
- Publication of information about meetings, public hearings, and special events on the City's website
- Direct mailings to those expressing interest in or commenting about certain topics
- General mailings with posters and flyers to area post offices and appropriate agencies, offices, and organizations for distribution to citizens

Individuals may access the entire Title VI program for the City of Sheboygan at <https://www.sheboyganwi.gov/407/Notice-of-Rights>.

F. Subcontracts and Vendors

All subcontractors and vendors who receive payments from the City of Sheboygan 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 the City of Sheboygan 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 the City of Sheboygan 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. The City of Sheboygan will process complaints that are complete.

Once the complaint is received, the City of Sheboygan will review it to determine if the City has jurisdiction. The complainant will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by the City.

Upon determination that the City has jurisdiction over the complaint, the City will promptly investigate the complaint. 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, the investigator 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, the complainant has 15 days after the date of the closure letter or the LOF to submit a written statement of their 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 City of Sheboygan at:
<https://www.sheboyganwi.gov/407/Notice-of-Rights> or by mail to:

City of Sheboygan
Attn: City Administrator
828 Center Avenue, Suite 300
Sheboygan, WI 53081

NOTE: The City of Sheboygan 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 the City of Sheboygan will be directly addressed by the City of Sheboygan. The City of Sheboygan shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City of Sheboygan shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of complaint should 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?

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 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 closure letter or the LOF to do so.

Once sufficient information for investigating the complaint is received by the City of Sheboygan, 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, the City of Sheboygan will notify the complainant of the action as soon as possible.

I. Goals & Objectives

The goal of the City's PPP is to offer a variety of opportunities for the public to engage in planning and decision-making activities. To meet this goal, the objectives of the PPP are:

- To determine what non-English languages and other barriers may exist to public participation within the City service area.
- To provide a general notification of meetings for public input, in a manner that is understandable to all populations in the service area.
- To hold meetings in locations that are accessible and reasonably welcoming to all area residents, including, but not limited to minority, LEP, and low-income members of the public.
- To utilize a variety of communication methods to capture public input from populations that are not likely to attend or engage in public meetings.

Limited English Proficiency Populations

A LEP individual is someone with limited ability to read, write, speak, or comprehend English. Reasonable efforts will be made to engage LEP populations utilizing techniques—such as the development of public notices in appropriate non-English Languages—that will provide contact information where individuals can be informed of the affected project, activity, or service to provide input and comments. In addition, appropriate non-profit organizations and other groups will be identified and utilized to disseminate information to and provide insight into the needs of LEP populations.

Low-Income Populations

The City will identify low-income populations within the service area. The low-income threshold will be defined as households with a per capita income of 80 percent or less of the national average. Low-income populations in the City will be given reasonable opportunity to provide input on projects, activities, and services to avoid disproportionate harm or lack of benefit.

Engaging minority and LEP populations can be challenging and the City will use multiple techniques to actively solicit policy input in the planning process for a project.

In accordance with Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), the City will identify and address the environmental effects of programs, policies, and activities on minority and low-income populations. The City will consider demographic data in its project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public's input and data analysis enable the City to develop measures to mitigate any potential adverse effects on minority and low-income populations. The City is not required to conduct environmental justice analyses of projects where NEPA documentation is not required.

J. 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. These four factors remain generally consistent within federal agencies, including the Department of Justice, The Department of Housing and Urban Development, and The Department of Health and Human Services. As a subrecipient of federal funds, City of Sheboygan has pledged to take reasonable steps to provide meaningful access to its services, and other services supplemented by federal funding, 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 City of Sheboygan, which receives federal assistance as a subrecipient.

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. These factors remain consistent within other federal departments or agencies.

Summary and Contents

City of Sheboygan 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 city. 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, City of Sheboygan completed the 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 City of Sheboygan.
2. The frequency with which LEP persons come into contact with City of Sheboygan programs, activities or services.
3. The nature and importance of programs, activities or services provided by City of Sheboygan in the lives of LEP persons.
4. The resources available to City of Sheboygan for LEP outreach, as well as the costs associated with that outreach.

A summary of the results of the City of Sheboygan 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 the City of Sheboygan

Sheboygan MPO staff reviewed data from the *2019-2023 American Community Survey (ACS), 5-year estimates* and determined that 9,869 persons age 5 and older in the service area (Cities of Sheboygan and Sheboygan Falls and the Village of Kohler) spoke a language other than English; this amounted to about 13.7 percent of the entire service area population age 5 and older (a population of 71,851). Within the service area, some 3,733 persons (5.2 percent) had limited English proficiency; that is, they speak English less than “very well.” Of those persons with limited English proficiency, 1,262 (1.6 percent) spoke Spanish, 377 (0.5 percent) spoke other Indo-European languages, and 2,105 (2.9 percent) spoke Asian and Pacific Islander languages (primarily Hmong). Some 4,198 of 32,693 households in the service area (6.4 percent) were considered linguistically isolated households. The 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 service area from the *2019-2023 ACS, 5-year estimates*. Table 1 indicates that Census Tract 3 had nearly 1,400 LEP people, while Census Tract 10 had close to 1,490 LEP people. Census Tracts 9 had about 1150 LEP people. In addition, Census Tract 8 had almost 970 LEP people. Census Tract 9 had the largest percentage of LEP persons (23.5 percent), followed by Census Tracts 2.01 (21.8 percent), 3 (21.3 percent), and 10 (20.8 percent).

Table 1 also shows that Census Tract 10 had the largest number of linguistically isolated households (564), followed by Census Tract 3, with about 500 linguistically isolated households. While two Census Tracts (8 and 9) each had closer to 470 linguistically isolated households. Census Tract 8 had the largest percentage of linguistically isolated households (20.2 percent), followed by Census Tracts 10 (19.7 percent), and 9 (19.5 percent).

Table 1 indicates that regarding 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 nine Census Tracts. Table 1 also indicates that regarding linguistically isolated households, Hmong was the dominant language in six Census Tracts, while Spanish was the dominant language in nine Census Tracts, and other Indo-European languages were dominant in one Census Tract.

| Census Tract | LEP Persons | | Predominant Language | Linguistically Isolated Households | | Predominant Language |
|--------------|-------------|------------|--------------------------|------------------------------------|------------|--------------------------|
| | Number | Percentage | | Number | Percentage | |
| 1 | 307 | 10.6% | Spanish | 178 | 13.9% | Spanish |
| 2.01 | 541 | 21.8% | Asian and Pacific Island | 167 | 14.9% | Asian and Pacific Island |
| 2.02 | 607 | 14.9% | Spanish | 341 | 18.0% | Spanish |
| 3 | 1,395 | 21.3% | Asian and Pacific Island | 507 | 18.2% | Asian and Pacific Island |
| 4 | 656 | 15.1% | Spanish | 303 | 14.6% | Asian and Pacific Island |
| 5 | 476 | 14.7% | Asian and Pacific Island | 193 | 10.9% | Asian and Pacific Island |
| 8 | 967 | 18.3% | Spanish | 471 | 20.2% | Spanish |
| 9 | 1,156 | 23.5% | Asian and Pacific Island | 466 | 19.5% | Asian and Pacific Island |
| 10 | 1,484 | 20.8% | Asian and Pacific Island | 564 | 19.7% | Spanish |
| 11 | 558 | 15.9% | Asian and Pacific Island | 215 | 13.1% | Asian and Pacific Island |
| 106.01 | 427 | 7.9% | Spanish | 182 | 7.3% | Spanish |
| 106.02 | 140 | 3.3% | Spanish | 100 | 5.2% | Spanish |
| 107 | 477 | 5.4% | Asian and Pacific Island | 213 | 5.7% | Other Indo-European |
| 108 | 348 | 9.0% | Spanish | 110 | 6.5% | Spanish |
| 109 | 71 | 2.5% | Spanish | 33 | 1.7% | Spanish |
| 114 | 259 | 11.3% | Spanish | 155 | 10.1% | Spanish |

Source: U.S. Bureau of the Census, *2019-2023 American Community Survey, 5-year Estimates* (Tables B16004 and S1602), Bay-Lake Regional Planning Commission, 2025.

FACTOR #2: The frequency with which LEP persons come into contact with City of Sheboygan programs, activities or services.

The LEP populations that City of Sheboygan engages with primarily speak Spanish and Hmong. The City comes into contact with LEP persons on an unpredictable and infrequent basis.

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

With respect to some of the City’s programs, activities, and services—such as police and fire—a denial or delay of access to services or information can have serious or even life-threatening implications.

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

The City currently has several employees who are bilingual and capable of providing translation from Spanish to English and Hmong to English. There is no additional financial cost to the City in using on-duty staff to provide translation services.

The City has contracted with Language Line for on call language translation services. Given the infrequency with which it is necessary to use Language Line, the total cost of using Language Line is relatively low.

How City of Sheboygan Staff May Identify an LEP Person who needs Language Assistance

As stated above, data from the *2019-2023 American Community Survey (ACS)* show that Spanish and Hmong speaking LEP persons are the primary groups requiring language assistance. The City will continue to monitor the language needs of the community. To that end, the City will continue to monitor the languages and English proficiency encountered by Staff. The City will also continue to observe the languages used and the level of English proficiency throughout the community in an attempt to identify minority language populations which may not be engaging with the City due to a language barrier. If such a language minority population is identified, the City will make outreach attempts.

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 City staff will respond to LEP persons, whether in person, by telephone or in writing, including the following:

- The City of Sheboygan Title VI Policy and LEP Language Assistance Plan will be posted on the City of Sheboygan website:
<https://www.sheboyganwi.gov/407/Notice-of-Rights>.
- The City 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 by telephone, City staff will work to determine the language of the LEP person and then access local interpreters as needed.

As of the adoption date of this Title VI Program, each customer service window at the City has been provided a contact list of City employees who speak a language other than English and have indicated a willingness to assist if translation is necessary. This contact list indicates whether the City employee is comfortable providing written language services (i.e., translating documents sent to the City or to be sent to an LEP person), oral language services (i.e., assisting in providing customer service to an LEP person, either in person or over the phone), or both. Customer service windows are also supplied with a Language Line Identification Card to guide utilization.

If Staff encounters an LEP person at a customer service window, they will attempt to identify the person's preferred language using the Language Line Identification Card. If there is an

available City employee to provide translation services, that City employee will provide the translation services. If there is not an available City employee to provide translation services, or there is a reason to not use a City employee to provide translation services in a particular circumstance, Staff will call Language Line.

Upon request, the City will also endeavor to provide translation services at meetings of the Common Council (including committees of the Common Council), other meetings covered by the Wisconsin Open Meetings Law, and other meetings and workshops sponsored or otherwise affiliated with the City.

If Staff receives a written communication in another language, Staff will attempt to identify the language. If there is a City employee comfortable providing written language services in that language, Staff will work with that City employee to provide an appropriate response to the LEP person. If there is not a City employee comfortable providing written language services in that language, or there is a reason not to use a City employee to provide translation services in a particular circumstance, Staff will make all reasonable efforts to identify a person who is qualified to translate the communication, and work with that translator to provide an appropriate response to the LEP person.

Upon the adoption of this Title VI Program, the Title VI Coordinator will begin the process of identifying vital documents and arranging for their translation into Spanish and Hmong by qualified translators. If an LEP person wishes to have a vital document translated before this translation process is complete, if an LEP person wishes to have a document other than a vital document translated, or if the LEP person wishes to have a document translated into a language other than Spanish or Hmong, the City will endeavor to have the document translated orally by a City employee or through the Language Line service.

Staff Training

The City will provide training to all current Staff regarding the City's Title VI responsibilities, including the City's policies and procedures regarding LEP persons. This training will be incorporated into the onboarding process of new City employees.

Staff that has regular contact with the public will also be trained to work effectively with in-person and with telephone interpreters.

Refresher trainings for all City Staff will be held at least every two years. The following components will be covered:

- Understanding the Title VI Policy and LEP responsibilities
- Language assistance that the City offers
- Documentation of language assistance requests
- How to handle a Title VI and/or LEP complaint

Procedures to Notify LEP Persons that Assistance is Available

There are several ways that the City 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 City of Sheboygan will make reasonable accommodations to translate pertinent materials into customer languages, or to provide an interpreter upon request.
- When the City 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.
- “Vital documents” will be translated into Spanish and Hmong (where determined to be necessary).

Updating and Monitoring of the LEP Language Assistance Plan

As mentioned above, one responsibility of the Title VI Coordinator is to review any future guidance, including Treasury Department directives, regarding LEP persons and to take all necessary action to revise this Plan in compliance with future guidance to ensure that LEP persons have meaningful access to the City’s programs, services, and activities.

The Title VI Coordinator shall also be responsible for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible to LEP persons, and working with the relevant staff to make the document, program, service, or activity accessible to LEP persons.

The Title VI Coordinator shall, at least once per year, review the Title VI Program in consultation with the City Attorney, Human Resources Director, Public Works Director, Director of Planning and Development, and other appropriate City Staff in order to verify the Title VI Program continues to ensure meaningful access by LEP persons to critical governmental services, in accordance with the intent of Executive Order 13166.

If the Title VI Coordinator receives an allegation that the City has violated its Title VI obligations, or if the Title VI Coordinator has received a suggestion indicating that there is an opportunity for improvement in the City’s Title VI Plan, the Title VI Coordinator shall consider and promptly make any appropriate changes to the City’s Title VI Plan.

Dissemination of the LEP Language Assistance Plan

The City will post this LEP Language Assistance Plan on its website, <https://www.sheboyganwi.gov/407/Notice-of-Rights>.

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:

Casey Bradley, City Administrator
City of Sheboygan
828 Center Avenue, Suite 300
Sheboygan, WI 53081
Phone: (920) 459-3287
E-Mail Address: casey.bradley@sheboyganwi.gov

Appendix A – Notice to the Public

English Notice to Public

Title VI Notice of Rights City of Sheboygan

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 or to obtain a copy of the City's Title VI complaint procedures and complaint form contact:

City of Sheboygan
Attn: Title VI Coordinator
828 Center Avenue, Suite 300
Sheboygan, WI 53081
920-459-3287
www.sheboyganwi.gov

If the complainant is unable to write a complaint, a representative of the complainant may file the complaint on the complainant's behalf. Complaints must be filed within 180 calendar days of the alleged incident.

If information is needed in another language or an alternative format, please call 920-459-3287.

- Spanish: Si necesita servicios de traducción para otro lenguaje, aparte de Ingles, por favor llamar al 920-459-3287 para asistencia.

Apéndice A – Notice to the Public

Notificación Al Público De Los Derechos Bajo El Título VI Ciudad de Sheboygan

Ciudad de Sheboygan opera sus programas y servicios sin distinción de raza, color, origen nacional, sexo, discapacidad, o edad de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964 y el Reglamento del Departamento de Transporte (Department of Transportation Regulations) 49 CFR Parte 21. Si cree que ha sido objeto de discriminación según lo prohíbe el Título VI, puede presentar una queja por escrito ante Ciudad de Sheboygan, Caltrans o a la Administración Federal de Carreteras (Federal Highway Administration). Para obtener más información o para obtener un formulario y el proceso de queja del Título VI comuníquese con Ciudad de Sheboygan:

City of Sheboygan
Attn: Title VI Coordinator
828 Center Avenue, Suite 300
Sheboygan, WI 53081
920-459-3287
www.sheboyganwi.gov

Si la persona no puede llenar su queja, un representante puede hacerlo en su nombre, o un empleado de Ciudad de Sheboygan le puede ofrecer asistencia. Las quejas deben ser entregadas a no más tardar de 180 días del hecho que se alega. Si se necesita información en otro idioma, contacte al 920-459-3287.

Appendix B – Complaint Form

English 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? | | Ye s | N o |
| 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? | | Ye s | N o |
| 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

City of Sheboygan operates without regard to race, color or national origin.

If you need assistance completing this form, contact the City of Sheboygan at:

Tel.: 920-459-3287

Email: casey.bradley@sheboyganwi.gov

Please submit this form in person or by mail to:

City of Sheboygan
Title VI Coordinator
828 Center Avenue, Suite 300
Sheboygan, WI 53081

Apéndice B

Formulario de Queja Título VI en Español

| Sección I | | | | |
|---|----------------|-----------------------|---------------------|--------|
| Nombre: | | | | |
| Dirección: | | | | |
| Teléfono (Casa/Celular): | | | Teléfono (Trabajo): | |
| Email: | | | | |
| Necesita un formato más accesible? | Letras Grandes | | Cinta de Audio | |
| | TTY/TDD | | Otro | |
| Sección II | | | | |
| ¿Llenas esta queja por tu parte? | | | S i | N o |
| Si la respuesta es "Si" para esta pregunta, ve a la Sección III. | | | | |
| Si es "No", por favor escriba su nombre y su relación con la persona: | | | | |
| Has obtenido permiso por parte de esta persona? | | | S i | N o |
| Por favor explique por qué habla por esta persona: | | | | |
| Sección III | | | | |
| Yo creo que la discriminación que yo experimenté fue basada en (marque todo lo que aplique): () raza () color () origen nacional () sexo () incapacidad () edad () otro _____ | | | | |
| Fecha de la discriminación (mes, día, año): | | | | |
| Explique lo más claro posible lo que ocurrió y por qué cree que usted fue discriminado (a). Si es posible, describa las personas, incluyendo nombres y datos de las personas que discriminaron en su contra y también nombres y datos de algunos testigos (si los hay). | | | | |
| | | | | |
| | | | | |
| | | | | |
| Sección IV | | | | |
| ¿Alguna vez usted ha llenado la queja Título VI con la Ciudad de Sheboygan? | | | S i | N o |
| Nombre: | | | | |
| Numero de teléfono: | | | | |
| Sección V | | | | |
| ¿Alguna vez ha llenado esta queja con alguna otra agencia federal, estatal o local o con alguna corte federal o estatal? | | | | |
| Si es sí, marque lo que aplique: | | | | |
| () Agencia Federal: | | () Corte Federal: | | |
| () Agencia Estatal: | | () Corte del Estado: | | |
| () Agencia Local: | | () Corte Local: | | |

| | |
|--|-----------|
| Por favor escriba los datos de las personas con las que usted habló en la agencia de arriba: | |
| Nombre: | Posición: |
| Agencia: | |
| Dirección: | |
| Teléfono: | |

Puede incluir cualquier otro material de información que usted crea que es importante para su queja. Su firma y fecha son requeridas aquí:

| | |
|-------|-------|
| Firma | Fecha |
|-------|-------|

Ciudad de Sheboygan opera sin fijarse en raza, color, lugar de origen, sexo, incapacidad, o edad.

Si necesita ayuda para llenar este formulario, llame a la Ciudad de Sheboygan al:

Tel.: 920-459-3287

Email: casey.bradley@sheboyganwi.gov

Por favor entregue este formulario en persona o por correo a:

City of Sheboygan
 Title VI Coordinator
 828 Center Avenue, Suite 300
 Sheboygan, WI 53081

Appendix C

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 the City of Sheboygan (hereinafter referred to as “the City”) may file a Title VI complaint by completing and submitting the City’s Title VI Complaint Form. The City investigates complaints received within 180 days of the alleged incident. The City will process complaints that are complete.

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

Upon determination that the City of Sheboygan has jurisdiction over the complaint, the City will promptly investigate the complaint. 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 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 closure letter or the LOF to do so.

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

Apéndice C

Procedimiento para quejas de Título VI

Cualquier persona que crea que él o ella ha sido discriminada en base a su raza, color, origen nacional, sexo, incapacidad, o edad por la Ciudad de Sheboygan (Ciudad) puede quejarse por medio de completar y presentar un formulario de queja de Título VI de la agencia. La Ciudad investiga las quejas que recibe dentro de 180 días a partir de la fecha del supuesto incidente. La Ciudad procesará los formularios de quejas que están completos.

Al recibir una queja, la Ciudad la revisará para determinar si la Ciudad puede actuar. El demandante recibirá una carta informándole si es que la queja será investigada por la Ciudad.

Una vez determinada que la Ciudad tiene jurisdicción sobre la queja, la Ciudad investigará la queja de manera rápida. El demandante tendrá 10 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 10 días hábiles, la Ciudad puede cerrar la investigación de forma administrativa. Una investigación también puede ser cerrada de forma administrativa si es que el demandante no desea continuar la investigación.

Después de que el investigador revise la queja, éste enviará una de dos cartas al demandante: una carta de clausura o una carta de descubrimientos (CDD). La carta de clausura resume las alegaciones y declara que no hubo una violación del Título VI y que la investigación se clausurará. Una CDD resume las alegaciones y las entrevistas acerca del supuesto incidente, y explica si acción disciplinaria, entrenamiento adicional para el empleado, u otra acción ocurrirá. Si el demandante desea apelar su decisión, éste tendrá 15 días después de la fecha de la carta o CDD para hacerlo.

Una persona también puede enviar una queja directamente a la respectiva Federal de agencia.

Appendix D

Tracking of Title VI Complaints

The City is required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, national origin, sex, disability or age:

- Active investigations
- Lawsuits
- Complaints naming the City of Sheboygan

Below is the list that will be used for tracking these incidents:

Investigations, Lawsuits and Complaints

| | Date (Month, Day, Year) | Summary (Include basis of complaint: race, color, national origin) | Status | Actions Taken |
|----------------|--|---|---------------|----------------------|
| Complaints | | | | |
| Investigations | | | | |
| Lawsuits | | | | |

Appendix F – Language Line Identification Card


Language Line provides translation services in more than 240 languages and American Sign Language. A Language Identification Card like the one included in this Appendix F will be made available at public meetings hosted by the City of Sheboygan.

| Europe | |
|--|---------------|
| Albanian Tregoni me gisht gjuhën tuaj. Do të thërrasim një përkthyes. Përkthyesi ofrohet falas për ju. | Shqip 🗣️ |
| Armenian Դձեր, թե որ լեզվով եք խոսում: Քարգանձիկը կկատարի: Քարգանձիկի ծառայությունները տրամադրվում են անվճար: | Հայերեն 🗣️ |
| Basque Zure hizkuntza aukeratu. Jarraian interprete bati deituko diogu. Zerbitzu hau doakoa da. | Euskara 🗣️ |
| Bosnian Pokažite svoj jezik. Pozvat ćemo tumača. Usluge tumača su besplatne za vas. | Bosanski 🗣️ |
| Bulgarian Почнете вашия език. Ще бъде извикан преводач. Преводчът е осигурен безплатно за вас. | Български 🗣️ |
| Croatian Pokažite svoj jezik. Prevoditelj će biti pozvan. Prevoditelja ćete dobiti besplatno. | Hrvatski 🗣️ |
| Czech Ukažte na váš jazyk. Bude zavolán tlumočník. Tlumočení je pro vás bezplatné. | Čeština 🗣️ |
| Danish Peg på dit sprog. En tolk vil blive tilkaldt. Tolken tilbydes uden omkostninger for dig. | Dansk 🗣️ |
| Dutch Wijs uw taal aan. Er zal contact worden opgenomen met een tolk. De service van de tolk is geheel gratis. | Nederlands 🗣️ |
| Estonian Osutage oma keelele. Vastava tõlgiga võetakse ühendust. Tõlketeenus on teie jaoks tasuta. | Eesti keel 🗣️ |
| Finnish Osoita maasi kieltä. Kutsumme tulkin paikalle. Tulkin käyttö on sinulle ilmaista. | Suomi 🗣️ |
| French Indiquez votre langue et nous appellerons un interprète. Le service est gratuit. | Français 🗣️ |
| German Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird angefordert. Der Dolmetscher ist für Sie kostenlos. | Deutsch 🗣️ |
| Greek Δείξτε τη γλώσσα σας και θα καλέσουμε ένα διερμηνέα. Ο διερμηνέας σας παρέχεται δωρεάν. | Ελληνικά 🗣️ |
| Hungarian Válassza ki a nyelvet. Tolmácsot fogunk hívni. A tolmács az Ön számára díjtalan. | Magyar 🗣️ |

| Europe - continued | |
|--|---------------|
| Icelandic Bentu á þitt tungumál. Það verður hringt í túlk. Túlkurinn er þér að kostnaðarlausu. | Íslenska 🗣️ |
| Italian Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito. | Italiano 🗣️ |
| Lithuanian Nurodykite savo kalbą. Bus pakviestas vertėjas. Vertėjas jums bus suteiktas nemokamai. | Lietuvių 🗣️ |
| Macedonian Покажете на јазикот на кој зборувате. Ке повикаме преведувач. Услугите на преведувачот се бесплатни. | Македонски 🗣️ |
| Norwegian Pek på språket dit. En tolk vil bli tilkalt. Tolken tilbyes kostnadsfritt for deg. | Norsk 🗣️ |
| Polish Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie. | Polski 🗣️ |
| Portuguese Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você. | Português 🗣️ |
| Romanian Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret caare vă este asigurat gratuit. | Română 🗣️ |
| Russian Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно. | Русский 🗣️ |
| Serbian Pokažite svoj jezik. Prevodilac ће бити позван. Prevodilac je за вас обезбедjen besplatno. | Српски 🗣️ |
| Slovak Ukažte na svoj jazyk. Zavoláme tlmočníka. Tlmočenie je pre vás bezplatné. | Slovenčina 🗣️ |
| Spanish Señale su idioma y llamaremos a un intérprete. El servicio es gratuito. | Español 🗣️ |
| Swedish Peka på ditt språk. En tolk kommer att tillkallas. Tolken erbjuds utan kostnad för dig. | Svenska 🗣️ |
| Ukrainian Вкажіть вашу мову. Вам викличуть перекладача. Послуги перекладача надаються безкоштовно. | Українська 🗣️ |
| Yiddish ווייזט אן אויף איינער שפראך און מען וועט רופן אן אַן איבערזעצער. איר דארפט גארניט באצאלן פאר דער איבערזעצונג. | יידיש 🗣️ |

| Pacific Islands | |
|--|---------------------|
| Fijian Dusia na nomu vosa. Ni na Vakaratukai mai e dua na dau vakadewa vosa. Na dau vakadewa vosa e sega ni saumi. | Vosa Vakaviti 🗣️ |
| Ilocano Itudo yo ti sao yo. Ag awag da ti maysa nga mangipatpararus nga tumulong kadakayo nga awan ti bayad na. | Ilokano 🗣️ |
| Indonesian Tunjukkan bahasa Anda. Penerjemah akan dihubungi. Penerjemah disediakan gratis tanpa dikenakan biaya. | Bahasa Indonesia 🗣️ |
| Malay Tunjukkan bahasa anda. Jurubahasa akan dihubungi. Jurubahasa akan disediakan tanpa anda dikenakan bayaran. | Bahasa Melayu 🗣️ |
| Marshallese Kelet kajin eo am. Im renaaj kúr juón am Ri-Ukok. Ri-Ukok eo enaaj jibañ eok ilo ejelok wóneen. | Kajin Majól 🗣️ |
| Samoan Fa'asino lau gagana. Ole a vala'au se fa'amatala'upu. Ua saunia se fa'amatala'upu e aunoa ma se tau e te totogiina. | Fa'asamoa 🗣️ |
| Tagalog Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo. | Tagalog 🗣️ |
| Tongan Tuhu 'i mai ho' o lea fakafonua. 'E ui ha fakatonulea. 'Oki ta 'etotongi kia 'a e fakatonulea. | Lea Faka-Tonga 🗣️ |

| North America, South America, and Caribbean | |
|---|----------------|
| French Indiquez votre langue et nous appellerons un interprète. Le service est gratuit. | Français 🗣️ |
| Haitian Creole Lonje dwèt ou sou lang ou pale a epi nan rel you entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis. | Kreyòl 🗣️ |
| Navajo Nizaad biká 'ígíí bich'í' dah diilniit. Ata' halmé 'é la' hágo bi' di' dooniit. Ata' halmé 'é éí doo haada yíí 'éego bik' é ní' diilbié da. T'áájitik' é ná ata' hodoolniit. | Diné K'ehjí 🗣️ |
| Portuguese Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você. | Português 🗣️ |
| Spanish Señale su idioma y llamaremos a un intérprete. El servicio es gratuito. | Español 🗣️ |



Language Identification Card

As a LanguageLine Solutions client you have access to over-the-phone interpretation 24 hours a day, 7 days a week. Use this Language Identification Card in a face-to-face situation to determine which language a person speaks. The Language ID Card lists the languages most frequently encountered in North America, grouped by the geographical region where they are commonly spoken.

- To use the Language ID Card efficiently, locate the geographical region where you believe the speaker may be from. (Pacific Islands, Europe, etc.)
- Show the person the languages listed for that region. The message underneath each language says: "Point to your language. An interpreter will be called. The interpreter is provided at no cost to you."

English **English** 🗣️

Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

- Refer to your Quick Reference Guide (QRG) to access an interpreter through LanguageLine Solutions. In most cases, an interpreter is available within seconds.
- If you are unable to identify the language, our representative will help you.

Please note: LanguageLine Solutions interprets from English into more than 200 languages. Only the most requested languages are listed here. This list is subject to change based upon client demand.

From North America call **1800 752-6096** for more information about our service.



Interpreting



Translation



Testing and Training

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Appendix G – Title VI Program Staff Training Form

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 the City of Sheboygan Title VI Coordinator.

I hereby acknowledge receipt of City of Sheboygan’s Title VI Program. I hereby acknowledge having participated in training about the City’s Title VI Program on _____.

I have read the City’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