

Aging and Disability Resource Center of Columbia County

Title VI Nondiscrimination Plan

Revised on: November 1, 2022

Adopted by: Aging and Disability Resource Center of
Columbia County

Original Title VI Plan

Adopted on: October 17, 2017

This plan is hereby adopted and signed by:

ADRC of Columbia County

Executive Name/Title: Heather Grove / Director

Executive Signature: Heather Grove

As a recipient of USDOT funding, per [FTA Circular 4702.1B](#) the **ADRC of Columbia County** is required to prepare a Title VI Nondiscrimination Plan including the following elements:

- Evidence of Policy Approval
- Policy Statement, Log of Policy Updates, Contact Information/Program Administration
- Notice of Nondiscrimination (**Appendix 1**)
- Complaint Procedure (**Appendix 2**)
- Complaint Form (**Appendix 3**)
- Recording and Reporting Civil Rights Investigations, Complaints and, and Lawsuits (**Appendix 4**)
- Public Involvement Plan (**Appendix 5**)
- Limited English Proficiency (LEP) Plan (**Appendix 6**)
- Demographic Representation Information (**Appendix 7**)
- Additional information, as required.

Policy Statement

ADRC of Columbia County is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the ADRC of Columbia County in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

ADRC of Columbia County receives federal financial assistance to provide transportation service for residents of Columbia County and to purchase vehicles to provide rides to elderly and disabled individuals.

Policy Updates – Activity Log

ADRC of Columbia County will review its policy on an annual basis to determine if modifications are necessary. The table below is used to record reviews/revisions made to the plan.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
11/01/2022	Updated Title VI Plan per WisDOT requirement. Revisions include updated Complaint Form, updated LEP Plan and Minority Representation Information with current US Census data.	Sue Lynch	
10/17/2017	Develop Title VI Plan	Becky Mulhern	

Contact Information/Program Administration

¹ Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” – Title 42 USC Section 2000d

Chief Executive

ADRC of Columbia County's Chief Executive will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name:	Sue Lynch, Director
Email:	Sue.Lynch@columbiacountywi.gov
Phone:	608-742-9233

Civil Rights Coordinator

ADRC of Columbia County's Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with **ADRC of Columbia County's** federally funded transportation activities. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/Nondiscrimination and LEP compliance. This position has a direct reporting relationship and access to **ADRC of Columbia County's** Chief Executive.

Name:	Sue Lynch, Director
Email:	Sue.Lynch@columbiacountywi.gov
Phone:	608-742-9233

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **ADRC of Columbia County's** nondiscrimination requirements, including the following activities:

- ✓ Program Administration
 - Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
 - Develop and implement the **ADRC of Columbia County's** Title VI/Nondiscrimination and LEP Plan
 - Update and maintain Title VI/Nondiscrimination and LEP program policies and procedures
- ✓ Complaints
 - Review, track, investigate and close Title VI/Nondiscrimination and LEP complaints
- ✓ Employee Training
 - Educate staff on Title VI/Nondiscrimination and LEP requirements and procedures
- ✓ Reporting
 - Prepare and submit Title VI/Nondiscrimination reports per state and federal regulations
- ✓ Public Dissemination
 - Notify the public of **ADRC of Columbia County's** Nondiscrimination requirements via the **ADRC of Columbia County's** public area, on its website, in vehicles, etc.
- ✓ Oversight
 - Ensure contractors and lessees adhere to Title VI/Nondiscrimination and LEP requirements

Notice of Nondiscrimination

FTA Title VI Circular 4702.1B requires **ADRC of Columbia County** as a recipient of federal financial assistance to notify the public of its obligations under U.S. DOT Title VI regulations and the protections against discrimination afforded to them by Title VI.

Title VI regulations require **ADRC of Columbia County** to inform the public of their rights under Title VI by posting a *Notice of Nondiscrimination*. The *Notice of Nondiscrimination* should be posted in the following locations: agency website, public areas of the agency office, and as applicable, inside vehicles, rider guides/schedules, and transit shelters/facilities.

The public notice must include a statement of nondiscrimination, information on how to request additional information about the agency's Title VI obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI information in another language.

ADRC of Columbia County's *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website -
<https://www.co.columbia.wi.us/columbiacounty/adrc/ADRCHome/Transportation/tabid/3543/Default.aspx>
- ✓ Agency office – P.O. Box 136, 111 East Mullett Street, Portage, WI 53901
- ✓ Inside vehicles

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish to contact **ADRC of Columbia County** at (608)742-2176 if additional information is needed in another language.

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

Complaint Procedure and Complaint Form

ADRC of Columbia County, as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/Nondiscrimination and LEP complaints and make the procedures available to the public upon request.

Any person, group or firm that believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) by **ADRC of Columbia County** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **ADRC of Columbia County** activities. Adverse impacts resulting in civil rights complaints can arise from many sources including the delivery of programs and services, or advertising, bidding and contracts.

Complaints can originate as a result of project and program impacts on individuals or groups. Examples include social and economic impacts such as access to programs, activities and services, failure to maintain facilities and vehicles, traffic, noise, air quality, and accidents. Complaints can also originate from individuals or firms alleging inability to bid upon or obtain a contract with **ADRC of Columbia County** for the furnishing of goods and services. Examples include advertising for bid proposals;

prequalification or qualification requirements; bid awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, etc.

ADRC of Columbia County's complaint procedure is shown in **Appendix 2** and made available in the following locations:

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Agency office – ADRC Director's Office

A copy of **ADRC of Columbia County's Complaint Form** is shown in **Appendix 3**. Complaints can be made verbally, emailed, written on a piece of paper or in whatever form as desired by the consumer, but a form is made available as another acceptable option.

Civil Rights Investigations

Recipients of federal financial assistance are required to maintain a list of any complaints alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status of the complaint, investigation, or lawsuit, actions taken by the recipient in response, and final findings related to the complaint, investigation, or lawsuit.

Appendix 4 is **ADRC of Columbia County's** procedure and tracking mechanism to investigate, track and resolve complaints.

Since the last update of this Title VI Nondiscrimination Plan (8/08/2018), there have been no transportation-related civil rights investigations, complaints, or lawsuits filed with the **ADRC of Columbia County**.

Public Involvement Plan

Recipients of federal financial assistance are required to develop a public involvement plan that includes outreach strategies and participation techniques to engage the public including minority, low-income, and Limited English Proficiency (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Nondiscrimination Plan.

While traditional means of seeking public involvement may not reach all individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

A copy of **ADRC of Columbia County's Public Involvement Plan** is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

As a recipient of federal USDOT funding, **ADRC of Columbia County** is required under Title VI of the Civil Rights Act of 1964 and Executive Order 13166 to develop and implement a plan to ensure accessibility to its programs and services for persons who are not proficient in the English Language.

A copy of **ADRC of Columbia County's Limited English Proficiency (LEP) Plan** is shown in **Appendix 6**.

The LEP plan outlines the policies and procedures **ADRC of Columbia County** will use to address the needs of persons with Limited English Proficiency (LEP) that wish to participate in **ADRC of Columbia County** programs and services.

Demographic Representation Information

ADRC of Columbia County understands that diverse representation on boards, councils, and committees help results in sound policy reflective of the needs of the entire population. FTA Title VI Circular 4702.1B requires any recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, membership of these committees must be broken down by race and accompanied by a description of efforts made to encourage the participation of minorities on these committees.

A copy of **ADRC of Columbia County's Minority Representation Information** is shown in **Appendix 7**.

Title VI - Notice of Nondiscrimination to the Public

ADRC of Columbia County's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

ADRC of Columbia County

- ✓ **ADRC of Columbia County** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by **ADRC of Columbia County** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with **ADRC of Columbia County**.
- ✓ For more information on **ADRC of Columbia County's** civil rights program, and the procedures to file a complaint, contact 608-742-9227, (for hearing impaired, please use Wisconsin Relay 711 service); email DSS@columbiacountywi.gov; or visit our administrative office at 111 East Mullett Street, Portage, WI 53901.
- ✓ For more information, visit the **ADRC of Columbia County** website at: [Columbia County ADRC Home Page](#)
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 608-742-9227.
Si se necesita informacion en otro idioma de contacto 608-742-9227.

Appendix 2

Complaint Procedure

ADRC of Columbia County's Complaint Procedure is made available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Hard copy in the ADRC and HHS reception desk

Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by the **ADRC of Columbia County** may file a complaint by completing and submitting **ADRC of Columbia County's** Complaint Form.

The Complaint Form may also be used to submit general complaints to **ADRC of Columbia County**.

ADRC of Columbia County investigates complaints received no more than 180 calendar days after the alleged incident. **ADRC of Columbia County** will process complaints that are complete.

Once the complaint is received, **ADRC of Columbia County** will review the complaint and work to resolve the complaint informally, if possible.

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

ADRC of Columbia County has 90 days to investigate the civil rights complaint and provide a written decision. If more information is needed to resolve the case, **ADRC of Columbia County** may contact the complainant.

The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, **ADRC of Columbia County** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, the complainant has 15 business days after the date of the letter or the LOF to do so. The Civil Rights Officer will then have 30 days to issue a decision on the filed appeal. This decision is final.

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

If information is needed in another language, then contact 608-742-9227.

Si se necesita informacion en otro idioma de contacto, 608-742-9227.

Complaint/Comment Form

ADRC of Columbia County is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints. Suggestions, compliments or complaints can also be made verbally to agency staff, through email, written on a piece of paper or whatever way is desired by the consumer.

Please submit this form electronically at dss@columbiacountywi.gov or in person at the address below.

SERVICE DELIVERY DISCRIMINATION COMPLAINT

Children and Families
DCF-F-156-E (R. 11/2017)

Health Services
F-00166 (11/2017)

Workforce Development
DETS-16707-E (R. 11/2017)

If you need help completing this form please contact:

Name - Equal Opportunity Coordinator	Phone (Voice) - -	Phone (TDD) - -
Name of Complainant	Phone - -	
Address (number, street, city, state, zip code)		

Federal civil rights laws prohibit discrimination of MEMBERS, APPLICANTS, ENROLLEES, AND BENEFICIARIES in any programs and activities that receive Federal financial assistance and that are run by State Agencies (DHS/DCF/DWD) directly or by its partners, local agencies, and contractors. Those laws prohibit recipients and subrecipients of Federal financial assistance from discriminating on the basis of race, color, national origin, sex, age, disability, and, in some programs, religious creed or political affiliation or beliefs, in their programs or activities, and in retaliating or engaging in reprisals against for opposing discrimination. If you were wrongfully denied services, or if the treatment you received was separate or different than others received, or if the program was not accessible to you, and you believe it was because of one or more of those protected bases, it may be discrimination. The precise nondiscrimination requirements depend on which Federal agency funds the program or activity.

Name of the Agency/Organization/Entity against whom the complaint is filed.

Name of the Federal program you were discriminated in by the agency/organization (e.g., BadgerCare, FoodShare, Child Protective Services, etc.)

Describe the action or treatment that you think was discriminatory. Include information about who, what, when, where, how, why, and the names, addresses and phone numbers of any witnesses, if you know them. Please be specific about the date of the last incident. You may write this on another sheet of paper if you need more room. In the space below, please say how many pages are attached, if you need to add pages.

Description of the relief or remedy you want:

SIGNATURE – Complainant or Complainant Representative

Date Signed (mm/dd/yyyy)

Health and Human Services of Columbia County
P.O. Box 136
111 East Mullett Street
Portage, WI 53901

Appendix 4

List of Complaints, Investigations and Lawsuits²

The ADRC of Columbia County maintains a log to track and resolve transit related complaints, investigations, and lawsuits.

Check One:

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with the ADRC of Columbia County.

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

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint ³	Summary Complaint Description	Status	Action Taken/ Final Outcome If Resolved

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

³ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Public Involvement Plan

The purpose of the **Public Involvement Plan** is to establish procedures that allow for, encourage, and monitor participation of all citizens within the **ADRC of Columbia County** service area including but not limited to low income and minority individuals, and those with Limited English Proficiency (LEP).

While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

Goal

The goal of public involvement is to offer real opportunities for the engagement of all citizens within the **ADRC of Columbia County** service area to participate in the development of plans, programs, and services.

Strategies

To promote inclusive public participation, **ADRC of Columbia County** uses the following strategies, as appropriate.

- Coordination and Consultation
 - Coordinate and consult with partners, stakeholders, program participants and their caregivers, and the public affected by the distribution of state and federal transit grant programs.
 - Seek guidance and input from WisDOT on public involvement mechanisms and strategies.
 - Maintain an electronic distribution list of all potential program participants, partners, stakeholders, etc.
- Accessibility and Information
 - Meetings
 - Adhere to state and federal public hearing requirements
 - Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
 - Hold meetings in locations which are accessible and reasonably welcoming to all area residents including, but not limited to, low-income and minority members of the public.
 - Employ different meeting sizes and formats
 - Provide avenues for two-way flow of information and input from populations which are not likely to attend meetings.
 - Make public information available in electronically accessible formats

- Use social media in addition to other resources to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.
- **Timeliness**
 - Provide timely information about state and federal grant programs to affected program participants, the public, partner agencies, and other interested parties.
 - Provide adequate notice of public involvement activities and time for public review and comment.
- **Public Comment**
 - Work openly and diligently to incorporate public comments received and to notify respondents of final plans, reports, programs, etc.
 - Provide for early, frequent and continuous engagement by the public
- **Social/Environmental Justice**
 - Seek and consider the needs of those traditionally underserved by participating in outreach efforts that address the needs of minority persons, the elderly, persons with disabilities, limited English Proficient individuals, and low-income households.
 - Determine what non-English languages and other cultural barriers exist to public participation within **ADRC of Columbia County** service area.
- **Training**
 - Participate in training to continuously improve the knowledge and understanding of civil rights and environmental justice principles.
- **Evaluation**
 - Document and maintain records of public outreach efforts.
 - Review the effectiveness of public participation activities.
 - Seek news ways to providing public input opportunities.

Participation Techniques

ADRC of Columbia County will use the following participation techniques as deemed appropriate. Participation techniques will be reviewed and modified each year, as necessary. If new techniques are tried and found to be successful, this list will be updated to include the new techniques.

- Booth at Community events (craft fair, festival, farmers market, parades, etc.)
- Advisory meetings and committees
- Direct mailings (letters, fliers, etc.)
- Website and social media
- Project-specific newsletter articles
- Public information meetings
- Presentations to community partners, citizens/residents, etc.
- Press releases, meetings with local media representatives
- Surveys (telephone, internet, and public information meetings)
- Work with partner organizations

Public Outreach Activities

ADRC of Columbia County maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, ADRC of Columbia County reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by ADRC of Columbia County are summarized below. Efforts include *meetings, surveys, focus groups, community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e. information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities					
Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Staff Members Responsible	Notes
Ongoing	Website, Facebook	2022 - Website and Social Media Materials	Website and Social Media Materials	Agency Staff	Columbia County ADRC Home Page (20+) Aging & Disability Resource Center of Columbia County Facebook
2/8/22 3/22/22 4/13/22	Columbus Lions Club Wisconsin Dells -HS Columbus High School	2022 - As requested and as invited	Focus Group/Meeting	Staff, Volunteers	
Monthly	ADRC Staff Meeting, HHS Board Meeting	2022 – Monthly/Public Notice	Meeting/E-mail	Staff	
Bimonthly	Grapevine Newsletter, ADRC Board Meeting	2022 - Bimonthly on the 15 th Online/Public Notice	Meeting/Mail	Staff	
Annual	Grant Application/Satisfaction	2022 – Online	Meeting, Survey	Staff	
Quarterly	TRIP	2022 - ADRC Website, Public notice	Meeting	Staff/Supervisors	
5/10/22 7/21/22 7/27- 7/31/22	VSO open house Portage Night Market Columbia County Fair	2022- Social Media, Online event listing, Posters	Information Booth	Staff, Volunteers	

Summary of Outreach Activities

Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Staff Members Responsible	Notes
8/2/22	National night out Columbus, Lodi, and Portage				

Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, **ADRC of Columbia County** is required to prepare a Limited English Proficiency (LEP) Plan to address its responsibilities relating to the needs of individuals with limited English language skills.

This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq., and its implementing regulations which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency”, issued in 2000 clarified Title VI of the Civil Rights Act of 1964. It states that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI in order to access public services or benefits for which they are eligible. While most individuals in Wisconsin read, write, speak, and understand English, for some individuals English is not their primary language. If these individuals have a limited ability to read, write, speak or understand English, they are considered Limited English Proficient (LEP).

The US DOT “Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons” discusses the concept of “safe harbor” with respect to the requirements for translation of written materials. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) **ADRC of Columbia County** must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

Recipients of federal financial assistance are also required to implement LEP plans in accordance with guidelines of the federal agency from which the funds are provided. FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients provides guidance and instructions for LEP Plan development.

Plan Summary

ADRC of Columbia County has developed this *Limited English Proficiency Plan* to identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by **ADRC of Columbia County**.

This plan outlines how to identify a person who may need language assistance, how to inform LEP persons language assistance is available, the ways in which assistance may be provided, and staff training.

Plan Components

As a recipient of federal US DOT funding, **ADRC of Columbia County** is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

This plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of the following:
 - ✓ How language assistance services are provided.
 - ✓ How LEP persons are informed of the availability of language assistance services.
 - ✓ How the language assistance plan is monitored and updated.
 - ✓ How employees are trained to provide language assistance to LEP persons.

Meaningful Access - Four Factor Analysis

To prepare this plan, the **ADRC of Columbia County** conducted a four-factor analysis which considers the following:

Factor 1 - Demography

Number and proportion of LEP persons who may be served or are likely to encounter a ADRC of Columbia County program or service.

This plan uses data.census.gov language data available by Wisconsin county. More data is available on the [US Census Bureau ACS website](https://www.census.gov/acs/).

The US Census Bureau—data.census.gov 2020 data shows there are numerous languages spoken in Columbia County. Some of these languages include Spanish, German, Japanese, Hmong, Tagalog, other Native North American Languages, and Arabic. After English, the second largest language group is Spanish.

S1601: Census Bureau Table

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

In Columbia County, with a population estimate of 58,490; 585 adults or 1.3% identified themselves as Spanish speaking and “speaking a language other than English”. This language group is below the 5%, or 1,000 persons threshold of the population to be served. This means the **ADRC of Columbia County** is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **ADRC of Columbia County** is also not required to provide written translation of vital documents in these languages.

In the future, if the **ADRC of Columbia County** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

Frequency of contact with LEP persons.

ADRC of Columbia County provides transportation services for individuals in Columbia County and to purchase vehicles for its program and services for seniors and individuals with disabilities.

ADRC of Columbia County reviewed the frequency with which its staff, policy board, and contractors have, or could have, contact with LEP persons in the conduct of **ADRC of Columbia County** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. Within the last year, **ADRC of Columbia County** staff, policy board members, and contractors have had 0 requests for interpreters and 0 requests for translated program documents in any setting.

ADRC of Columbia County staff, policy board members, and contractor staff will be trained on what to do when they encounter a person with limited English proficiency.

ADRC of Columbia County with assistance from its contractor tracks the number of encounters and considers adjustments to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **ADRC of Columbia County's** programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

Log of LEP Encounters

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

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

***"I Speak"* Language Identification Card**

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

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Factor 3 – Importance

Nature and importance of program to LEPs.

The **ADRC of Columbia County** receives federal financial assistance to provide transportation service in Columbia County and to purchase vehicles for its program and services for seniors and individuals with disabilities. Information is available online at:

<https://www.co.columbia.wi.us/columbiacounty/adrc/ADRCHome/Transportation/tabid/3543/Default.aspx>

The **ADRC of Columbia County** and understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services, and socialization. Transportation services provides a key role in connecting LEP persons to these essential services.

Factor 4 – Resources and Costs

Resources available and overall cost to provide LEP assistance.

Given the small size of LEP encounters and small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request. The **ADRC of Columbia County** will contact state and local units of government and community resources for assistance in translation services.

Even though the **ADRC of Columbia County** does not have a separate budget for LEP outreach, it continuously explores ways to implement low cost methods of notifying LEP persons of transportation services. Outreach efforts include maintaining a website, utilizing social media, developing and printing brochure/materials and having a visible presence in our community (e.g., participating in job fairs, parades, community events, etc.) to promote transportation services. Additional low-cost outreach

methods to reach LEP communities include but are not limited to activities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

Language Assistance Services

Overview - Language Assistance Services

If a person does not speak English as their primary language and is LEP, that person may be entitled to language assistance with respect to **ADRC of Columbia County's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

ADRC of Columbia County will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

ADRC of Columbia County strives to offer the following measures:

- ✓ When encountering LEP persons directly, **ADRC of Columbia County** staff use the "*I Speak*" *Language Identification Card* or posters to identify the language and communication need of LEP persons. The **ADRC of Columbia County** also uses CLI translation services and can access on-site bilingual staff as they are available.
- ✓ Maintain a *Log of LEP Encounters* to capture information on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Work with translation services as necessary to assist with the development of bilingual outreach materials.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>
- ✓ Utilize online resources such as Google Translate to assist with the translation of documents. The main downside of this approach is accuracy. As such, this option will be used by the **ADRC of Columbia County** on limited basis. Instead, the **ADRC of Columbia County** will seek assistance from fluent speakers.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Public Outreach – Informing LEP Persons of Language Assistance Services

The **ADRC of Columbia County** uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts the Title VI/LEP *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact the **ADRC of Columbia County** to request information in another language.

- ✓ When encountering LEP persons directly, **ADRC of Columbia County** will use the "*I Speak*" *Language Identification Card* to identify the language and communication needs of LEP persons so that ADRC staff can engage interpreter services.
- ✓ Review outreach activities and information gathered from the *Log of LEP Encounters* on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Develop and maintain cooperative relationships with key agencies/community organizations that serve LEP populations in the area or region. These entities can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs.
- ✓ Utilize translation services such a fluent speaker on staff, seeking out language assistance from community organizations, Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>

Monitoring, Evaluating and Updating the Plan

The **ADRC of Columbia County** will review the LEP Plan on an annual basis. Review and updates will include the following:

- ✓ The number of documented LEP person contacts.
- ✓ How the needs of LEP persons have been addressed.
- ✓ Determine whether the need for translation services has changed.
- ✓ Determine with existing language assistance services are effective and sufficient to meet the needs of LEP persons.
- ✓ Determine whether complaints have been received concerning the **ADRC of Columbia County's** failure to meet the needs of LEP individuals.
- ✓ Utilization of CLI and on-site interpreter services (encounters and minutes).
- ✓ Sufficiency of staff training.
- ✓ Review of any new opportunities for LEP communication.
- ✓ Determine whether financial resources are needed to fund language assistance services.

Training Staff

The following training will be provided to **ADRC of Columbia County** staff:

- ✓ Information on the **ADRC of Columbia County's** Title VI Non-Discrimination Plan and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Use of the "I-Speak Card" as a tool to assist LEP individuals.
- ✓ Documentation of language assistance requests using the *Log of LEP Encounters*.
- ✓ How to handle Title VI Non-Discrimination and LEP complaints.
- ✓ Annual Civil Rights training.

Demographic Representation Information⁴

A. Demographic Representation Table⁵

The table below depicts US Census county population data by race and the **ADRC of Columbia County's** non-elected committees/councils related to transit.

U.S. Census Bureau QuickFacts: Wisconsin

Body	Caucasian	Hispanic/Latino	Black/African American	Asian American	Native American	Two or More Races
Columbia County Population	94.5%	4.0%	2.1%	0.80%	0.80%	1.60%
ADRC – Transportation Committee (TRIP)	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

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

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

⁴ If **ADRC of Columbia County** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the **ADRC of Columbia County**, Title VI regulations require the **ADRC of Columbia County** to provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

⁵ County data by race is available at the WisDOT website <https://wisconsin.gov/Documents/doing-bus/local-gov/astnce-pgms/transit/compliance/title6-race.pdf> or the US Census Bureau website <http://data.census.gov>

Demographic Representation Data Collection Form⁶

Name of board, commission, council, etc.

Date:

Dear Member,

As a recipient of federal funds, **ADRC of Columbia County** is required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **ADRC of Columbia County** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the **ADRC of Columbia County**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI and LEP requirements. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

Asian or Pacific Islander: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

Black and/or African American (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

Caucasian (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

⁶ This form is an optional tool the **ADRC of Columbia County** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI plan requirements.

