

Manitowoc County – ADRC of the Lakeshore

Title VI/ADA Nondiscrimination Plan

Revised on: 4/27/2026

Adopted by: ADRC Board

Original Plan

Adopted on: June 14, 2014

This plan is hereby adopted and signed by:

ADRC of the Lakeshore

Executive Name/Title: Wendy Hutterer, Director

Executive Signature: _____

As a recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) **ADRC of the Lakeshore** is required to prepare a Title VI/ADA Nondiscrimination Plan with the following elements:

- Evidence of Policy Approval
- [Policy Statement](#), [Log of Plan Updates](#), [Contact Information/Program Administration](#)
- Notice of Nondiscrimination ([Appendix 1](#))
- Complaint Procedure ([Appendix 2](#))
- Complaint Log ([Appendix 3](#))
- Complaint Form ([Appendix 4](#))
- Public Involvement Plan ([Appendix 5](#))
- Limited English Proficiency (LEP) Plan ([Appendix 6](#))
- Language Assistance Tools ([Appendix 7](#))
- Demographic Representation Information ([Appendix 8](#))

Policy Statement

ADRC of the Lakeshore is committed to ensuring that no person is excluded from the participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, sex, age, or disability in any and all programs, activities or services administered by the **ADRC of the Lakeshore** in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

ADRC of the Lakeshore receives federal financial assistance to provide public transportation service in Manitowoc and Kewaunee counties and to purchase vehicles to provide rides to elderly and disabled individuals.

Plan Updates – Activity Log

ADRC of the Lakeshore will review its policy on an annual basis to determine if modifications are necessary. The table below outlines the Title VI/ADA Plan reviews/revisions made by the **ADRC of the Lakeshore**

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
April 2, 2026	Updated Title VI/ADA Plan per WisDOT requirement. Revisions included updated Complaint Form, updated Language Assistance Plan and Demographic Representation Information with current US Census data	Adam Miller Wendy Hutterer	Provide a copy of the Title VI Plan to: Maritime Metro Assist-to-Transport
June 22, 2021	Updated Title VI Plan per WisDOT requirement. Revisions included updated Complaint Form, updated LEP Plan and Minority Representation Information with current US Census data	Kim Novak	Provide a copy of the Title VI Plan to: Maritime Metro Assist-to-Transport
June 14, 2014	Develop Title VI Plan	Cathy Ley	

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](#)

Contact Information/Program Administration

Chief Executive

ADRC of the Lakeshore'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:	Wendy Hutterer
Email:	WendyHutterer@manitowocountywi.gov
Phone:	920-683-4481

Civil Rights Coordinator

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

Name:	Adam Miller
Email:	adamiller@manitowocountywi.gov
Phone:	920-683-2773

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

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

Notice of Nondiscrimination

[FTA Title VI Circular 4702.1B](#) requires **ADRC of the Lakeshore** 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 and ADA regulations require **ADRC of the Lakeshore** to inform the public of their rights under Title VI and ADA 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 and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI and ADA information in another language.

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

- ✓ Agency website - <https://manitowocountywi.gov/departments/aging-and-disability-resource-center/transportation/>
- ✓ Agency office – (Waiting Room)
- ✓ Inside vehicles
- ✓ Mobility Manager's office

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact **ADRC of the Lakeshore** at [920-683-4180](tel:920-683-4180) if additional information is needed in another language.

To view a copy of **ADRC of the Lakeshore's** *Notice of Nondiscrimination*, please see [Appendix 1](#).

Complaint Procedure, Complaint Form, and Complaint Log

ADRC of the Lakeshore as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/ADA Nondiscrimination 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, sex, age, or disability by **ADRC of the Lakeshore** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **ADRC of the Lakeshore** activities. 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.

ADRC of the Lakeshore's complaint procedure shown in [Appendix 2](#) is available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office – (Waiting Room)

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 actions related to the complaint, investigation, or lawsuit.

[Appendix 3](#) is **ADRC of the Lakeshore's** *Complaint Log* procedure and tracking mechanism to investigate, track and resolve complaints.

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

Complaint Form

ADRC of the Lakeshore's *Complaint Form* is shown in [Appendix 4](#).

Public Involvement Plan

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

ADRC of the Lakeshore's *Public Involvement Plan* is shown in [Appendix 5](#).

Limited English Proficiency (LEP) Plan

Recipients of federal financial assistance are required to develop and implement a plan to ensure accessibility to its programs and services for persons who are not proficient in the English Language. [FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients](#) provides guidance and instructions for plan development.

ADRC of the Lakeshore's *Limited English Proficiency (LEP) Plan* is shown in [Appendix 6](#).

The LEP Plan outlines the policies and procedures the **ADRC of the Lakeshore** uses to address the needs of LEP persons wanting to participate in **ADRC of the Lakeshore** transportation services.

Demographic Representation Information

ADRC of the Lakeshore understands that diverse representation on boards, councils, and committees results in sound policy reflective of the needs of the entire population. [FTA Title VI Circular 4702.1B](#) requires recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, to report membership of these committees broken down by race and include a description of efforts made to encourage participation.

ADRC of the Lakeshore's *Demographic Representation Information* is shown in [Appendix 7](#).

Appendix 1

Notice of Nondiscrimination to the Public

ADRC of the Lakeshore's Notice of Nondiscrimination is posted in the following areas:

- ✓ Public area of the agency office
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules

Notice of Nondiscrimination

ADRC of the Lakeshore

- ✓ **ADRC of the Lakeshore** is committed to ensuring that no person is excluded from the participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, sex, age, or disability in any and all programs, activities, or services administered by **ADRC of the Lakeshore** 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 the Lakeshore**
- ✓ For information on **ADRC of the Lakeshore's** civil rights program, procedures to file a complaint, or request a reasonable modification contact adamiller@manitowocountywi.gov or [920-683-4180](tel:920-683-4180), (for hearing impaired, please use [Wisconsin Relay 711 \(1-800-947-6644\)](tel:1-800-947-6644)) or visit our administrative office at 1701 Michigan Avenue, Manitowoc, WI 54220.
- ✓ Information is also available online at: <https://manitowocountywi.gov/departments/aging-and-disability-resource-center/transportation/>
- ✓ A complaint may also be filed directly with the following:
 - Wisconsin Department of Transportation (WisDOT), Senior Title VI and ADA Coordinator, Phone: [\(608\) 266-8129](tel:608-266-8129), TTY (800) 947-3529, Fax: (608)267-3641, Email: taqwanya.smith@dot.wi.gov, 4822 Madison Yards Way, 5th Floor South, Madison, WI 53705. For more information, visit <https://wisconsindot.gov/Pages/doing-bus/civil-rights/titlevi-ada/filingcomplaint.aspx>
 - U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: [1-888-446-4511](tel:1-888-446-4511) or 711(Relay), email: FTACivilRightsCommunications@dot.gov
- ✓ If information is needed in another language, contact [920-683-4180](tel:920-683-4180).
Si se necesita informacion en otro idioma de contacto, [920-683-4180](tel:920-683-4180).
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau [920-683-4180](tel:920-683-4180).

Website Statement:

ADRC of the Lakeshore operates its programs and services without regard to race, color, national origin, sex, age, or disability in accordance with Title VI of the Civil Rights Act, Americans with Disabilities Act (ADA), and related nondiscrimination authorities. For more information on the **ADRC of the Lakeshore's** civil rights program, ADA obligations, and the procedures to file a complaint or make a reasonable modification, contact adamiller@manitowocountywi.gov, [920-683-4180](tel:920-683-4180). For hearing impaired, please use Wisconsin Relay 711 ([1-800-947-6644](tel:1-800-947-6644)) or <https://wisconsinrelay.com>.

Appendix 2

Complaint Procedure

ADRC of the Lakeshore' *herein after referred to as ADRC of the Lakeshore* Complaint Procedure is in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
 - ✓ Agency office – (Waiting Room)
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Any person who believes they've been discriminated against on the basis of race, color, national origin, sex, age, or disability by the **ADRC of the Lakeshore** may file a complaint by completing and submitting the **ADRC of the Lakeshore's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **ADRC of the Lakeshore**.

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

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

ADRC of the Lakeshore has **60** business days to investigate the civil rights complaint. If more information is needed to resolve the case, **ADRC of the Lakeshore** 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 case.

If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, **ADRC of the Lakeshore** 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 or ADA 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 **10** business days after the date of the letter or the LOF to do so. A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact [920-683-4180](tel:920-683-4180); Si se necesita informacion en otro idioma de contacto, [920-683-4180](tel:920-683-4180); Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau [920-683-4180](tel:920-683-4180).

Appendix 3
Complaint Log

List of Complaints, Investigations and Lawsuits²

ADRC of the Lakeshore maintains a log to track and resolve transportation related civil rights complaints, investigations, and lawsuits.

Check One:

X Since the last update of this Title VI/ADA Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with **ADRC of the Lakeshore**.

- The table below has no entries because the **ADRC of the Lakeshore** does not have transportation related civil rights complaints, investigations, or lawsuits.

There has been transportation related civil rights investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

Note: The performance measure for tracking when an investigation begins and when its administratively closed is documented in the **Complaint Log** table below. **ADRC of the Lakeshore** will strive to complete the investigation within the timeframe specified in its **Complaint Procedure**.

Type Complaint Investigation Lawsuit	Date Complaint Received (Month, Day, Year)	Complainant's Contact Information Name/Phone/ Email/Address	Basis of Complaint³	Summary Complaint Description	Action Taken/ Final Outcome if Resolved List dates of action steps including the dates complaint/ investigation begins and is administratively closed.	Status Open/ Closed

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, Sex, Age, Other.

Appendix 4
Complaint/Comment Form

We want your feedback. If you would like to submit a complaint or comment, please complete this form, and submit it via email to adamiller@manitowocountywi.gov or in person at the address below.

ADRC of the Lakeshore
1701 Michigan Avenue
Manitowoc, WI 54220

You may also call us at [920-683-4180](tel:920-683-4180). Please make sure to provide your contact information in order to receive a response.

Section A: Accessible Format Requirements

Please check the preferred format for this document

Large Print	TDD or Relay	Audio Recording	Other (if selected please state what type of format you need in the box below)
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Section B: Contact Information

Name	Telephone Number (including area code)
Address	City
State	Zip Code

Email Address

Are you filing this complaint on your own behalf?	Yes	No
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If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
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Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

Complaint	Suggestion	Compliment	Other
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Which of the following describes the nature of the comment? Please check all that apply.

Race	Color	National Origin	Religion
Age	Sex	Transportation Service	Income Status
Limited English Proficient (L.E.P)		Americans with Disability Act (A.D.A)	

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	Paratransit	Shared Ride Taxi	Bus
What was the date of the occurrence?			
What was the time of the occurrence?			
What is the name or identification of the employee or employees involved?			
What is the name or identification of others involved, if applicable?			
What was the number or name of the route you were on, if applicable?			
What was the direction or destination you were headed to when the incident occurred, if applicable?			
Where was the location of the occurrence?			
Was the use of a mobility aid involved in the incident?	Yes	No	
Please add any additional descriptive details about the incident.			

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Section E: Follow-up

May we contact you if we need more details or information?	Yes	No
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If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone	Email	Mail
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If you would prefer to be contacted by phone, please list the best day and time to reach you.

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Have you filed a complaint with any other federal, state, or local agencies?	Yes	No
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If yes, list agencies and contact information (agency name, address, email, phone).

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Section F: Desired Outcome

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

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Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to ADRC of the Lakeshore.

Name	Date:
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Signature

Appendix 5

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 **ADRC of the Lakeshore** service area including low income and minority individuals, persons with disabilities, 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 the **Public Involvement Plan** 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 opportunities for the engagement of all citizens within **ADRC of the Lakeshore** service area to participate in the development of plans, programs, and services.

Strategies

To promote public participation, **ADRC of the Lakeshore** 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 with efforts to engage low-income, minority, LEP, and disabled community members.
 - 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, newspaper ads on stations and in publications in the service area that serve LEP populations. Outreach may also include audio programming available on podcasts.

- Expand traditional outreach methods by visiting grocery 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 traditionally underserved populations by participating in outreach efforts that address the needs of minority persons, the elderly, persons with disabilities, LEP individuals, and low-income households.
 - Determine what non-English languages and other cultural barriers exist to public participation within the service area.
- Training
 - Participate in training to continuously improve the knowledge and understanding of civil rights 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 the Lakeshore will use the following participation techniques as deemed appropriate. Participation techniques will be reviewed and modified each year, as necessary. If new techniques are tried and found to be successful, this list will be updated to include the new techniques.

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

Public Outreach Activities

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

The direct public outreach and involvement activities conducted by **ADRC of the Lakeshore** are summarized below. Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (e.g., 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,	Website and Social Media Materials	Website and Social Media Materials	Tehya Kramper	
Ongoing	Marketing/ Promotional Materials	Advertisement at ADRC Resource Fairs	Printed Materials	Agency Staff	
Ongoing	Radio	Radio	Provide information on Public Transportation Options	Linda Grider Adam Miller	
Last Wed. of the month after quarter ends	County Transportation Coordinating Committee Meetings	Quarterly	Website, public notices	Adam Miller	
Ongoing	Newsletter	Every other month	Printed Materials	Tehya Kramper	

Appendix 6

Limited English Proficiency (LEP) Plan

Overview

[Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq](#) and its implementing regulations state that no person shall be subjected to discrimination on the basis of race, color, or national origin. The denial of language assistance services can be evidence of discrimination on the basis of national origin or disability under some circumstances.

Recipients of federal financial assistance are required to implement language assistance 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 language assistance plan development.

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 *Limited English Proficiency (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 the Lakeshore** must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

Plan Summary

ADRC of the Lakeshore has identified reasonable steps for providing language assistance for persons with limited English proficiency who wish to access services provided by the **ADRC of the Lakeshore**.

This plan outlines how to identify a person who may need language assistance, how to inform 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 the Lakeshore** 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 following:
 - ✓ **Demography** of LEP persons in the service area
 - ✓ **Frequency** of contact with LEP persons
 - ✓ **Importance** of language assistance services
 - ✓ **Resources and costs** to provide language assistance services

2. A description of language assistance services:
 - ✓ 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, **ADRC of the Lakeshore**

Factor 1 - Demography

Number and proportion of LEP persons with language assistance needs who may be served or are likely to encounter a ADRC of the Lakeshore program or service.

The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.

This plan uses [US Census Bureau – American Fact Finder \(2011-2015\)](#) language data available at the county level in Wisconsin. More data is available on the [US Census Bureau ACS website](#).

The US Census Bureau – American Fact Finder (2011-2015) data show there are numerous languages spoken in Manitowoc County. Some of these languages include Spanish, Hmong, French, German, Serbo-Croatian, Gujarati, Chinese, Korean, and Tagalog. After English, the second largest language group is Spanish.

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 in the county served. 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 the Lakeshore** must provide translation of vital documents in written format for non-English speaking persons.

- ✓ In **Manitowoc County**, with a population estimate of 76,290, 655 people have identified themselves as Spanish speaking and “speaks English less than very well” and 476 individuals have identified themselves as Hmong speaking and “speaks English less than very well”.

The Spanish and Hmong language groups are less than 1% and below the 5%, or 1,000 persons threshold of the population to be served. This means **ADRC of the Lakeshore** is not required to provide written translation of vital documents in Spanish or Hmong and all other languages shown in the US Census data. In the future, if ADRC of the Lakeshore meets the Safe Harbor Threshold for any other language groups, 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.

Interactions with LEP persons is an important feedback mechanism as the more frequent the contact, the more likely enhanced language services will be needed.

ADRC of the Lakeshore provides transportation service for the elderly and disabled residents of Manitowoc County.

ADRC of the Lakeshore reviewed the frequency with which its staff, volunteers, and bus drivers have, or could have contact with persons with limited English proficiency in the conduct of **ADRC of the Lakeshore** 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 the Lakeshore Services** staff, volunteers, and senior bus drivers have had (0) zero requests for interpreters and (0) zero requests for translated program documents in any setting.

ADRC of the Lakeshore staff, volunteers, and bus drivers are trained on what to do when they encounter a person with limited English proficiency.

ADRC of the Lakeshore staff with assistance from its lessees, as applicable track the number of encounters and considers adjustments to its outreach efforts to ensure meaningful access to all persons and specifically LEP and minority populations. The *Log of Language Assistance Encounters* is a tool to gather information on persons needing language assistance ([Appendix 7](#)).

Log of Language Assistance Encounters

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

If a language barrier were to exist, **ADRC of the Lakeshore** works to provide a reasonable accommodation. The *“I Speak” Language Identification Card* shown below is a document that can be used by **ADRC of the Lakeshore** staff to assist individuals. Additional languages can be added, as needed, to match the demographic changes of **ADRC of the Lakeshore’s** service area. The languages included in the *“I Speak” Language Identification Card* below represent languages spoken within the **ADRC of the Lakeshore** 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 Simplified
	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 हूँ	Hindi

Factor 3 – Importance

Nature and importance of language assistance.

Transportation plays a key role in connecting people to essential services. Language assistance services and community outreach activities such as engaging community organization(s) can help ensure the public and LEP populations have access to essential transportation services.

Transportation fare/service changes and eligibility requirements should be clearly communicated so the public and LEP persons can access essential programs and services. It is important that LEP individuals understand their rights and benefits when accessing transportation program and services to ensure they have been treated fairly.

Factor 4 – Resources and Costs

Resources available and overall cost to provide language assistance.

Given the few language assistance encounters, 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. Additionally, **ADRC of the Lakeshore** can contact state and local governments and community agencies for translation assistance or consider the use of a language translation services, as needed.

ADRC of the Lakeshore continuously explores ways to notify the public and LEP persons of transportation services. Outreach efforts include posting information on its website, utilizing social media, developing and printing brochure/materials, and having a visible community presence (e.g., posting information at libraries, community centers, grocery stores and participating in community events, farmer’s markets, local festivals, etc.). The cost is relatively low but the ability to reach the community members is high.

Language Assistance Services

Overview - Language Assistance Services

ADRC of the Lakeshore takes steps to provide meaningful access to LEP individuals who have difficulty communicating in English.

ADRC of the Lakeshore strives to offer the following measures:

- ✓ Post Title VI/ADA Nondiscrimination information on **ADRC of the Lakeshore**.
- ✓ Day to day operations:
 - Utilize the “*I Speak*” *Language Identification Card* or posters to identify the language and communication needs of individuals.
 - Maintain a *Log of Language Assistance Encounters* to capture information on the frequency of contact with LEP persons to determine whether additional language assistance services are needed to ensure meaningful access by LEP persons.
- ✓ At public meetings or other community events:
 - Greet participants as they arrive at **ADRC of the Lakeshore** public meetings or community events.
 - Use “*I Speak*” language identification cards at sponsored events.
 - Tools such as an “*I Speak*” *Language Identification Card* can gauge attendee’s ability to speak and understand English. Although translation may not be able to be provided at an event it helps identify needs at future events.
 - Maintain a log of language assistance encounters at public meetings or other community events.
- ✓ 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/> This relay service is available in English-to-English, Spanish-to-Spanish (800-833-7813) and Spanish-to-English (877-490-3723).
- ✓ Translation Services
 - Seek translation assistance from community organizations such as:
 - **Hmong Center of Green Bay**, <https://www.hmongcenterofgb.org>, 920-609-4019
 - **Casa ALBA Melanie**, <https://www.casaalba.org>, 920-445-0104
- ✓ Utilize online resources such as Google Translate to assist with translation requests. A downside of this approach is accuracy therefore this option will be used on a limited basis. Instead, **ADRC of the Lakeshore** will seek assistance from fluent speakers.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of documents/publications available upon request, within a reasonable time frame.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Public Outreach – Language Assistance Services

The following are measures **ADRC of the Lakeshore** takes to inform the public of language assistance services:

- ✓ Post the Title VI/ADA *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact **ADRC of the Lakeshore** to request information in another language.
- ✓ When encountering persons not proficient in English, **ADRC of the Lakeshore** staff will use the “*I Speak*” *Language Identification Card* to identify language and communication needs.
 - **ADRC of the Lakeshore** may not be able to immediately accommodate or assist individuals self-identifying as a person not proficient in English but will seek means to follow up with individuals to address language needs as soon as possible.
- ✓ Review outreach activities and information gathered from *Log of Language Assistance Encounters* to determine whether additional language assistance services are needed.
- ✓ Develop and maintain cooperative relationships with key agencies/community organizations in the area or region. These entities can assist in providing or verifying translations and/or identifying gaps in assistance to persons with language needs.
 - Utilize translation assistance from community organizations such as:
 - **Hmong Center of Green Bay**, <https://www.hmongcenterofgb.org>, 920-609-4019
 - **Casa ALBA Melanie**, <https://www.casaalba.org>, 920-445-0104
- ✓ 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> This relay service is available in English-to-English, Spanish-to-Spanish ([800-833-7813](tel:800-833-7813)) and Spanish-to-English ([877-490-3723](tel:877-490-3723)).

Monitoring, Evaluating and Updating the Plan

ADRC of the Lakeshore will review its language assistance services on an annual basis and examine the following:

- ✓ Document the number of LEP person contacts.
- ✓ Determine whether the need for translation services has changed.
- ✓ Determine which existing language assistance services are effective and sufficient to meet the needs of LEP persons.
- ✓ Determine whether complaints have been received concerning **ADRC of the Lakeshore's** failure to meet the needs of individuals regarding language assistance.
- ✓ Sufficiency of staff training.
- ✓ Determine whether financial resources are needed to fund language assistance services.

Training Staff

The following training will be provided to **ADRC of the Lakeshore** staff:

- ✓ Information on **ADRC of the Lakeshore's** Title VI/ADA Non-Discrimination Plan and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Use of the "I-Speak Card" to assist individuals and document language assistance requests.
- ✓ How to handle Title VI/ADA Non-Discrimination complaints.

Appendix 7

Language Assistance Tools

“I Speak” Language Identification Card

“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 Simplified
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	o magsalita ng Tagalog	Tagalog
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

Log of Language Assistance Encounters

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

Language Translation Request Log

Date	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Actions (Was Translation Services Provided?)	Staff Member Providing Assistance	Notes

Appendix 8
Demographic Representation Information⁴

A. Demographic Representation Table⁵

[FTA Title VI Circular 4702.1B](#) requires recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, to report membership of these committees broken down by race and include a description of efforts made to encourage participation of minority community members.

The table below depicts US Census county population data by race in ADRC of the Lakeshore and the membership of the **ADRC of the Lakeshore’s** transportation related non-elected committee/council/board.

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Some Other Race	No Response
Manitowoc County Population	89.9%	4.28%	1.1%	2.71%	0.4%	1.65%	-----
ADRC Board	100%	0%	0%	0%	0%	0%	---
ADRC of the Lakeshore Transportation Committee	100%	0%	0%	0%	0%	0%	---

B. Efforts to Encourage Participation

ADRC of the Lakeshore understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As vacancies on non-elected committees, councils, and boards become available, **ADRC of the Lakeshore** will make efforts to encourage participation of minority community members. To encourage participation **ADRC of the Lakeshore** will reach out to community organizations to connect with minority population groups in its service area. In addition, **ADRC of the Lakeshore** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

Demographic Representation Data Collection Form⁶

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

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

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

Name of board, commission, council, etc.

Date:

This is an optional tool to gather information on the racial composition of Board members.

Dear Member,

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

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

Anti-Discrimination Notice

It is unlawful for **ADRC of the Lakeshore** 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, national origin, sex, age, disability, or veteran status.

As a council under the jurisdiction of **ADRC of the Lakeshore**, we invite council members to voluntarily self-identify their race/ethnicity for us to comply with FTA Title VI 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.