

# **Title VI Plan**

## **City of Beloit**

Adopted on: May 8, 2017 Adopted by:

Michelle A. Gavin — Director of Transit

Revised on: October 1, 2020

*This policy is hereby adopted and signed by:*

### **City of Beloit**

Executive Name / Title: Lori S Curtis Luther – City Manager

Executive Signature: \_\_\_\_\_

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### **Policy Statement**

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

### **Title VI Plan Elements**

The **City of Beloit's** Title VI plan includes the following elements:

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

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

## TITLE VI Notice to the Public

The BTS's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

**THE BELOIT TRANSIT SYSTEM (BTS)**

- ✓ BTS operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with BTS.
- ✓ For more information on BTS's civil rights program, and the procedures to file a complaint, contact the Operations Manager, phone: 608-364-2870; email [thompsonj@beloitwi.gov](mailto:thompsonj@beloitwi.gov); or visit our administrative office at 1225 Willowbrook Road, Beloit, WI 53511 or the BTS Transfer Center located at 225 Shirland Avenue, Beloit, WI 53511. For more information, visit [www.beloittransit.com](http://www.beloittransit.com)
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 608-364-2870. *Si se necesita informaci6n en otro idioma de contacto, 608-364-2870.*

The BTS's Notice to the Public is posted in the following locations: *(check all that apply)*

- ✓ Agency website [[www.beloittransit.com](http://www.beloittransit.com)]
- ✓ Public areas of the administrative office
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules
- ✓ Transfer Center

## Title VI Complaint Procedure

The BTS Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the administrative office
- ✓ Transfer Center
- ✓ Available in appropriate languages for LEP populations (Spanish), meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the BTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

BTS investigates complaints received no more than 180 days after the alleged Incident. BTS will process complaints that are complete.

Once the complaint is received, BTS will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

BTS has 30 days to investigate the complaint. If more information is needed to resolve the case, BTS 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, BTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so. Appeals can be directed to the City of Beloit Deputy Community Development Director in writing or at 608-364-6705. Appeals will be reviewed by the Deputy Director following the same procedures and timelines above for the original complaint to BTS.

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 608-364-2870. *Si se necesita informaciOn en otro idioma de contacto, 608-364-2870.*

## Title VI Complaint Form

The BTS's Title VI Complaint Form is made available in the following locations:

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the administrative office
- ✓ Transfer Center
- ✓ Available in appropriate languages for LEP populations (Spanish), meeting the Safe Harbor Threshold,

<b>Section I:</b>	
Names:	
Address:	
Telephone (Home):	Telephone (Work):
Electronic Mail Address:	
<b>Section II:</b>	
Are you filing this complaint on your own behalf? (Circle one)	YES*                      NO
<b>*If you answered "yes" to this question, go to Section III.</b>	
If not, please supply the name and relationship of the person for whom you are filing for:	
Please explain why you have filed for a third party:	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	YES                      NO
<b>Section III:</b>	
I believe the discrimination I experienced was based on (check all that apply):	
<input type="checkbox"/> Race	<input type="checkbox"/> Color <input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year):	
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.	
<b>Section IV:</b>	
Have you previously filed a Title VI complaint with this agency?	YES                      NO

**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

YES

NO

If yes, check all that apply:

Federal Agency

State Agency

Federal Court

Local Agency

State Court

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI:**

Name of agency complaint is against:

Contact person:

Title:

Telephone:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Beloit Transit - Administrative Office  
Attention: James Thompson  
Re: Title VI  
1225 Willowbrook Rd  
Beloit, WI 53511

## **Declaración de política**

La Ciudad de Beloit, como destinatario de la subvención de la Administración Federal de Tránsito (FTA), ya sea directamente del FTA o a través del Departamento de Transporte de Wisconsin (WisDOT) cumplirá con el Título VI de la Ley de Derechos Civiles de 1964 (42 USC 2000d) y el Regulaciones de implementación del Departamento de Transporte de EE. UU.

## **TITULO VI NOTICIA AL PUBLICO**

Aviso del BTS al pOblico es siguiente:

NotificaciOn al public() de los derechos bajo el titulo VI

**EL SISTEMA DE TRANSITO DE BELOIT (BTS)**

- ✓ Los programas y servicios del BTS operan sin distincion de raza, color y nacionalidad de acuerdo con el Titulo VI de la ley de los derechos civiles. Cualquier persona que cree que el o ella han sido agraviados por cualquier practica discriminatoria ilegal bajo el Titulo VI puede presentar una queja al BTS.
- ✓ Para obtener mas informacion sobre el programa de los derechos civiles de la BTS, y los procedimientos para presentar una queja, pongase en contacto con el Director de BTS, telefono: 608 364 2870; TDD 608 364 2868; Correo electronic° (email) [thompsonj@beloitwi.gov](mailto:thompsonj@beloitwi.gov). O visite nuestra oficlna administrativa en 1225 Willowbrook Rd. Beloit, WI 53511. O en la estacion de autobuses situados en 225 Shirland Avenue Beloit WI 53511. y para obtener mas informacion puede usted visitar nuestra pagina (web site) [www.beloittransit.com](http://www.beloittransit.com)
- / La persona afectada puede presentar una queja directamente ante la AdministraciOn Federal de Transito en la oficina de los Derechos Civiles, Atencion: Coordinador del programa Titulo VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE Washington, DC, 20590.
- ✓ *Si necesita informacion en otro idioma, comuniquese al telefono 608 3264 2870.*

El Departamento de Transito De Beloit (BTS) pone las notificaciones en los siguientes lugares: ( Marque todas las que apliquen):

- ✓ Lugar de la oficina en la WEB ( [www.beloittransit.com](http://www.beloittransit.com))
  - ✓ Zonas Publicas de la Oficina Administrativa
  - ✓ Guías y Horarios
- En la estaciOn de los autobuses en Shirland Ave.

## Titulo VI Procedimiento para poner una queja

Titulo VI Procedimiento para poner una queja en el Departamento de Transito (BTS) esta a su disposicion en las siguientes ubicaciones: (Marque todas las que apliquen):

- ✓ Sitio en la WEB del Departamento de Transito, ya sea como referenda al aviso al public° en su totalidad
- ✓ Copia en la oficina del Departamento (BTS)
- ✓ En la Estacion de los autobuses en Shirland Avenue
- ✓ Disponible en los idiomas adecuados para los diferentes tipos de poblaciones de LEP (Español) alcanzando los lmites del (Safe Harbor Threshold).

Cualquier persona que cree que of o ella ha sido discriminado en base a su raza, color o su nacionalidad, por el departamento (BTS) se puede presentar una queja del Titulo VI, llenando y enviando el formulario de denuncias de la agenda Titulo VI.

El Departamento (BTS) investigara las quejas recibidas a mas tardar 180 dfas, despues del supuesto incidente. El Departamento (BTS) procesara las quejas que estan completas.

Una vez recibida la queja, el departamento (BTS) revisara la queja para determinar si nuestra oficina tiene jurisdiccion. La persona que mando la queja recibira una carta de reconocimiento informandole si la queja sera investigada por nuestra oficina.

El BTS tiene 30 dias para investigar la queja. Si se necesita mas informaciOn para resolver este caso, BTS Puede comunicarse con esta persona.

La persona que presente la queja tiene 10 dias habiles, desde el momento que envio esta carta para mandar toda la informaciOn solicitada para que la oficina pueda asignar una persona para este caso.

Si esta persona no es contactada por la persona que presento la queja, o no se pueda recibir mas informacion adicional dentro del periodo de los 10 dias, el BTS administrativamente puede cerrar el caso. Un caso puede ser cerrado administrativamente tambien si la persona que presentO la queja ya no desea seguir el caso.

Despues que de que esta persona que fue asignada para revisar esta queja, al /ella emitira una carta una que posiblemente sera Carta final u otra Carta de Fallo (LOF)

- ✓ Una carta final con el resumen de las acusaciones y afirmando de que no hubo ninguna violation del Titulo VI y que el caso sera cerrado.
- ✓ Una Carta de fallo (LOF) resume de las denuncias y las entrevistas sobre el presunto incidente y explicara cualquier =ion disciplinaria, entrenamiento adicional para la persona del staff u otra action disciplinaria.

Si la persona que presento la queja desea apelar la decision, el/ella tiene 30dfas despues de la fecha de la Carta o el (LOF) para hacerlo. Apelaciones pueden ser dirigidas a la Ciudad de Beloit al Director de obras Publicas por escrito o a el Telefono 608-364-6690. La apelacion sera revisada por el Director de Obras POblicas siguiendo los mismos procedimientos mencionados en la parte de arriba de la queja original.

Una persona puede tambien hacer una queja directamente con el Federal Transit Administration, con direction. FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.

Si se necesita informacion en otro idioma por favor hablenos 608-364-2870.

## Formulario de queja del Título VI

El Formulario de queja de Título VI de BTS está disponible en las siguientes ubicaciones:

- ✓ Sitio web de la agencia, ya sea como referencia en el Aviso al público o en su totalidad.
- ✓ Copia en papel en la oficina administrativa.
- ✓ Estación de autobuses en Shirland Ave.
- ✓ Disponible en los idiomas apropiados para las poblaciones de LEP (Español) reconociendo (Safe Harbor Threshold).

Nombre:				
Dirección:				
Teléfono (Hogar):			Teléfono (Trabajo):	
Correo Electrónico:				
Necesita requisitos especiales:	Letra Grande		Otro	
Usted está presentando esta queja en su nombre?			SI *	No
<b>* SI contesta "SI" a esta pregunta vaya a la Sección III.</b>				
Si no, por favor suministrar el nombre y la relación de la persona a quien usted está haciendo la queja:				
Por favor explique por qué usted está haciendo esta queja por la otra persona:				
Por favor confirme que usted ha obtenido el permiso de la persona agraviada, para llenar este formulario en su lugar.			Si	No
Creo que la discriminación que he experimentado está basada. (Marque todas las que apliquen):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad				
Fecha de la supuesta Discriminación (Mes, Día, Año):				
<p>Explique lo más claramente posible qué sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona que lo discriminó (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio para escribir, use el reverso de este formulario.</p>				



Anteriormente usted ha presentado una queja del Título VI con este Departamento?	Si	No
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <input type="checkbox"/> Si <input type="checkbox"/> No Si es así marque todas las que se apliquen: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Tribunal Federal <input type="checkbox"/> Agencia del estado _____ <input type="checkbox"/> Tribunal Estatal <input type="checkbox"/> Agencia local _____		
Proporcione toda la información sobre la persona o personas de contacto en la agencia / tribunal donde se presentó la queja.		
<b>Nombre:</b>		
<b>Título:</b>		
<b>Agencia:</b>		
<b>Dirección:</b>		
<b>Teléfono:</b>		
Nombre de la agencia en la que se presenta la queja:		
Persona de Contacto:		
Título:		
Teléfono:		

Usted puede adjuntar cualquier material escrito u otra información que crea usted que sea necesario para esta queja.

Firma y Fecha son requeridas abajo

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor presente este formulario en persona, o envíelo por correo a la siguiente dirección:

Oficina administrativa de Beloit Transit (BTS)  
 Re: Título VI  
 1225 Willowbrook Road  
 Beloit, WI 53511

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

<b>Recipient: Beloit Transit System (BTS)</b>		
<b>Contact Person:</b> _____	<b>Signature:</b> _____	<b>Date:</b> _____

**Check One:**

- There have been no investigations, complaint and/or lawsuits filed against us during the report period.
- \_\_\_\_\_  There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*
- \_\_\_\_\_

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

# Public Participation Plan

## Strategies and Desired Outcomes

To promote inclusive public participation, the **City of Beloit** will employ the following strategies, as appropriate:

- ✓ Explore the use of 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.
- ✓ Attempt to expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.
- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Explore social media in addition to other resources as a way to gain public involvement
- ✓ Explore local publications that serve LEP populations.
- ✓ Coordinate with local organizations such as Stateline Literacy Council, Latino Service Providers Coalition and similar to assist with outreach
- ✓ Coordinate with SLATS MPO
- ✓ Coordinate with Janesville Transit Service (JTS) and Rock County Specialized Transit (RCST)

## Public Outreach Activities

The **City of Beloit** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City of Beloit** 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 the **City of Beloit** are summarized in the table below. Efforts include *meetings, surveys, focus groups, attendance at 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. posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

<b>Event Date</b>	<b>City of Beloit Staffer(s)</b>	<b>Event</b>	<b>Date Publicized and Communication Method</b> (Public Notice, Posters, Social Media)	<b>Outreach Method</b> (Meeting, Focus Group, Survey, etc).	<b>Notes</b>
6/12/17	Hecox, Flesch, Dupuis, Nee	TIP Amendment for SMTD	Formal Public Notice 5/26/17 & 6/5/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 31 attendees
9/27/17	Flesch, Dupuis, Nee	Draft TIP	Formal Public Notice 9/13/17 & 9/20/17, MPO Website, Email List	Open House	Stateline YMCA (combined with Bike and Pedestrian Plan Open House) 16 attendees
10/23/17	Gavin, Flesch, Dupuis, Nee	Final TIP	Formal Public Notice 10/9/17 & 10/16/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 21 attendees
12/7/17	Gavin, Flesch, Nee	SLATS Title VI Plan, Cooperative Agreement between SLATS, BTS and WisDOT	Formal Public Notice 11/22/17 & 11/30/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 20 attendees
4/16/18	Hecox, Flesch, Dupuis, Nee	Cooperative Agreement between SLATS, SMTD and IDOT	Formal Public Notice 3/16/18 & 3/23/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 24 attendees
8/18/18	Janke	Employer Transit needs planning	Email list	Online Survey	Employer survey. 12 respondents
10/15/18	Dupuis, Nee	Draft TIP	Formal Public Notice 9/28/18 & 10/5/18, MPO Website, Email List	Open House	Beloit Public Library 3 attendees
10/29/18	Gavin, Hecox, Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan Performance Measure Targets)	Formal Public Notice 10/16/18 & 10/22/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 21 attendees
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Onsite in-person	Pop-up meetings	7 locations around Stateline with about 40 participants

<b>Event Date</b>	<b>City of Beloit Staffer(s)</b>	<b>Event</b>	<b>Date Publicized and Communication Method</b> (Public Notice, Posters, Social Media)	<b>Outreach Method</b> (Meeting, Focus Group, Survey, etc).	<b>Notes</b>
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Internal scheduling	Stakeholder meetings	7 meetings with representatives from area organizations
6/18/19	SRF	MPO-wide Transit Plan	Internal scheduling	Operator meeting	At Transit Administration Building
6/18/19	SRF	MPO-wide Transit Plan	Onsite in-person	Pop-up meeting and ride-alongs	At Transfer Center, various bus rides
7/25/19	SRF	MPO-wide Transit Plan	Tablets onboard or link provided to complete later	On-board survey	36 responses
7/24/19	SRF	MPO-wide Transit Plan	Email lists, City website, Facebook during survey timeframe	Community Survey (paper and online)	English and Spanish at 8 locations and online. 88 responses.
8/22/19	SRF	MPO-wide Transit Plan	Email list to businesses	Focus Group, questionnaire, phone follow up	Interest in new route to serve business parks
10/14/19	Dupuis, Nee	Draft TIP	Formal Public Notice 9/27/19 & 10/4/19, MPO Website, Email List	Open House	Beloit Public Library 4 attendees
10/28/19	Hecox, Downing, Thompson, Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan Performance Measure Targets	Formal Public Notice 10/11/19 & 10/21/19, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 22 attendees

## Language Assistance Plan

### Plan Components

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

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

Most individuals in BTS's service area read, write, speak and understand English. There are some individuals for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they are considered limited English proficient, or "LEP."

The BTS Language Assistance Plan includes the following elements:

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

### Methodology

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

LEP *Four Factor Analysis*

- **Factor 1: Demography:** What is the number or proportion of LEP persons served and the languages spoken in the service area?

#### Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires BTS to review its US Census data to determine if it meets the LEP *Safe Harbor Threshold*.

## US Census and American Community Survey (ACS) Data

BTS did the following:

1. Inserted a copy of the City of Beloit's LEP data in the Title VI plan. This data is from the American Fact Finder, 2013-2017 American Community Survey 5-Year Estimates (Appendix 1)
  2. BTS analyzed the LEP demographic data for BTS's program and/or service area by calculating the *Safe Harbor Threshold* language groups identified other than English.
    - a. 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 City of Beloit.
      - i. 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) BTS must provide translation of vital documents in written format for the non-English users.
      - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public, Title VI Complaint Procedure, Title VI Complaint Form, ADA paratransit eligibility forms, and rider's guides.
  3. Explained the results of the analysis of the City LEP data in the demographic section of the *Four Factor Analysis*.
- **Factor 2: Frequency:** How often does your staff come into contact with LEP persons?

### Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which BTS staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

- **Factor 3: Importance:** How does the program, service or activity affect people's lives?

### Overview

The summary below discusses how BTS's program and services impact the lives of person's within the community. BTS will specify the community organizations that serve LEP person, if available.

- **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the methods used by the BTS to provide outreach to LEP persons as well as train staff (and/or its contractor/lessee) on Title VI and LEP principles.

*Additional Required Elements*

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

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

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

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

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

*And, any additional information deemed necessary.*

**BTS — Summary of the Language Assistance Plan Components**

Item #1 — Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i>
----------------------------------------------------------------------------------------------------------------

Factor 1-- Demography

The majority of BTS's service area is contained within the City of Beloit, WI and there is an express route connecting to the City of Janesville. If we use County data to capture these additional areas, we exceed the Safe Harbor Threshold for only Spanish-speaking LEP persons in number (3,389) but not percentage (roughly 2.2% Spanish-speaking LEP persons county-wide). Based on the City of Beloit's population, that percentage jumps to roughly 5.8% (based on 1,970 individuals), and so that was the data we used. The next three highest LEP populations within the City of Beloit are other Indo-European (87 individuals), Asian/Pacific Island (97 individuals) and other languages (10 individuals).



Factor 2 — Frequency

BTS staff will be trained on what to do when they encounter a person that speaks English less than well. BTS will track the number of encounters and consider making adjustments as needed to outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of BTS's programs and services.

BTS assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, BTS has had no requests for interpreters, no requests for translated BTS documents and no complaints.

Factor 3 — Importance

The BTS understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A public transit system is a key link to connecting LEP persons to these essential services.

For that reason, BTS will strive to consider, notify, and involve LEP persons whenever decisions are made regarding transportation issues, transit planning or projects.

Factor 4 — Resources and Costs

Even though the BTS does not have a separate budget for LEP outreach, BTS is committed to reaching LEP persons. For example, the BTS has access to Spanish speaking employees working within the departments within the City of Beloit. This has ensured that riders may request materials printed and on-line in Spanish. In addition, the BTS works with local advocacy groups (SLC and LSPC), the School District of Beloit and the SLATS MPO to reach LEP populations.

Item # 2 - Description of how Language Assistance Services are Provided, by Language
--------------------------------------------------------------------------------------

BTS has access to Spanish speaking employees working within and in other departments within the City of Beloit as well as the local advocacy groups mentioned above should translation or interpretive services be needed. BTS has Spanish versions of their rider's guides, Non-Discrimination Notices, and the Complaint Forms. Also, BTS issues Spanish/English translation pocket booklets to their operators.

BTS will display a language identification chart at public meetings, at the transfer center and at the administrative office to help LEP individuals identify their language to BTS staff. BTS will work with existing resources to provide low-cost language assistance to the best extent possible.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

BTS does the following to inform LEP persons of the availability of language assistance services: translation of vital documents, creating and posting multi-language announcements and other information. BTS works with local advocacy groups (SW and LSPC). A link to on-line translation widgets is provided on the BTS website for instant translation of applicable web content. The cost is relatively low but the ability to reach the LEP population is high. BTS will continue to reach out to LEP populations through these efforts.

Item # 4 — Description of how the Language Assistance Plan is Monitored and Updated

BTS reviews its plan on an annual basis or more frequently as needed. In particular, the BTS will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

In addition, if relevant, BTS will meet with its contractor/transit provider to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on 05/02/2014.

At a minimum the LAP will be updated every three years in conjunction with the Title VI program and Triennial review process.

Item # 5 - Description of how Employees are trained to provide language assistance to LEP persons.

BTS employees are educated on the principles of Title VI and the BTS Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. An important discussion point is that of language assistance. English to Spanish pocket guides will be provided to all drivers. If a driver, dispatcher or employee needs further assistance related to LEP program participants, he/she will work with BTS's Operations Manager to identify strategies to meet the language needs of the participants of the program or service.

As part of our annual check in meeting, if relevant, BTS will meet with its contractor/transit provider to discuss updates to BTS's Language Assistance Plan

## **Minority Representation Information**

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

BTS is a Division of the City of Beloit, Wisconsin, a general-purpose unit of government governed by elected officials. No non-elected advisory committees exist for BTS. Occasionally, advisory committees are created on an ad hoc basis. In such instances, it is hereby the expressed policy of BTS management that efforts will be made to appoint and involve minorities.

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

BTS understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. Occasionally, advisory committees are created on an ad hoc basis. In such instances, it is, hereby, the expressed policy of BTS management that efforts will be made to appoint and involve minorities on these advisory committees.

## **Fixed Route Service Standards**

### ***Vehicle Load Standards***

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 32 seated + 24 standee passengers for 35-foot low-floor buses. BTS vehicle load during peak times had yet to achieve loads greater than 1 providing for a seated load at all times.

### ***Vehicle Headway Standards***

Vehicle headways on all regular BTS weekday routes are 40 minutes. BTS Saturday routes function on 80-minute headways with the exception of the Blue Route that has a 40-minute headway. Shorter headways, although desirable, are prohibitive for budgetary reasons at BTS.

### ***On-Time Performance Standards***

At BTS a vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than one minute late. The BTS on-time performance objective is 90% or greater. BTS continuously monitors on-time performance and system results are published monthly.

### ***Service Availability Standards***

BTS strives to make transit service available such that 90% of all residents within the greater Beloit area do not have to walk more than 1/2 mile to a bus route.

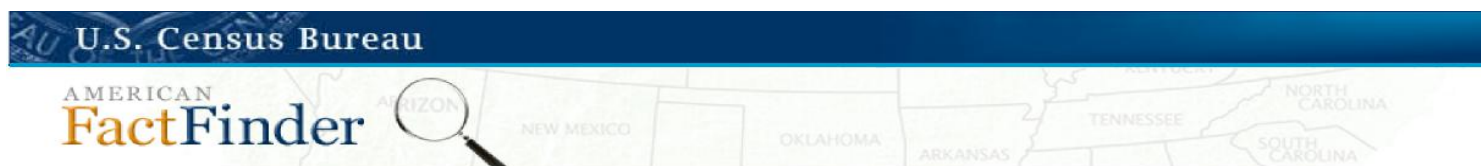
## **Fixed Route Service Policy**

### ***Vehicle Assignment Policy***

Vehicle assignment is a moot point in the BTS system from the standpoint of discrimination for the following reasons: The bus route structure and route interlining dictate that all BTS routes traverse areas with high concentrations of minorities and low income households. All BTS buses are similar vintage, identical make and model, identically sized, maintained in excellent condition and all are identically equipped. All buses are fully maintained. Bus assignments are rotated periodically as needed for maintenance and warranty mileage maximization (longer routes).

### ***Transit Amenities Policy***

Installation of transit amenities (benches, signage, and shelters) are based on the number of passenger boarding's at stops and stations along the routes.



S1601 LANGUAGE SPOKEN AT HOME  
2013-2017 American Community Survey 5-Year Estimates

**Note:** This is a modified view of the original table.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

Subject	Beloit city, Wisconsin				
	Total	Percent	Percent of specified language speakers		
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"
	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over	33,924	(X)	31,760	93.6%	2,164
Speak only English	27,917	82.3%	(X)	(X)	(X)
Speak a language other than English	6,007	17.7%	3,843	64.0%	2,164
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>					
Spanish	5,284	15.6%	3,314	62.7%	1,970
Other Indo-European languages	399	1.2%	312	78.2%	87
Asian and Pacific Island languages	256	0.8%	159	62.1%	97
Other languages	68	0.2%	58	85.3%	10
<b>CITIZENS 18 YEARS AND OVER</b>					
All citizens 18 years old and over	24,731	(X)	24,184	97.8%	547
Speak only English	22,626	91.5%	(X)	(X)	(X)
Speak a language other than English	2,105	8.5%	1,558	74.0%	547
Spanish	1,658	6.7%	1,232	74.3%	426
Other languages	447	1.8%	326	72.9%	121

Subject	Beloit city, Wisconsin
	Percent of specified language speakers
	Percent speak English less than "very well"
	Estimate
Population 5 years and over	6.4%
Speak only English	(X)
Speak a language other than English	36.0%
SPEAK A LANGUAGE OTHER THAN ENGLISH	
Spanish	37.3%
Other Indo-European languages	21.8%
Asian and Pacific Island languages	37.9%
Other languages	14.7%
CITIZENS 18 YEARS AND OVER	
All citizens 18 years old and over	2.2%
Speak only English	(X)
Speak a language other than English	26.0%
Spanish	25.7%
Other languages	27.1%

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using 2013 data or multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2013-2017 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

#### Explanation of Symbols:

1. An '\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.