

City of Sun Prairie

Title VI Plan

Revised on: January 21, 2021

Adopted by: Sun Prairie City Council

Adopted on: February 2, 2021

This policy is hereby adopted and signed by:

City of Sun Prairie

Executive Name/Title: Aaron Oppenheimer, City Administrator

Executive Signature:

Policy Statement

The **City of Sun Prairie** 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 **City of Sun Prairie** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Title VI/ADA Plan Elements

The **City of Sun Prairie's** Title VI/ADA plan includes the following elements:

1. Evidence of Policy Approval, Log of Policy Updates, Contact Information/Program Administration
2. Notice of Nondiscrimination
3. Complaint Procedure
4. Complaint Form
5. List of transit related Complaints, Investigations and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

The **City of Sun Prairie** will review its policy on an annual basis to determine if modifications are necessary.

Log of Policy Updates

The **City of Sun Prairie** will use the table below to record reviews/revisions made to the plan.

As applicable, **City of Sun Prairie** will discuss Title VI/ADA plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI/ADA plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
1/13/2022	Update	Sandy Xiong	Update to new template.
1/21/2021	Update	Philip Gritzmacher, Jr.	Update to 2020 Plan. New Template.
9/10/2018	Update	Kristin Vander Kooi / Philip Gritzmacher, Jr.	Update to 2014 Plan
4/15/2014	Adoption	Kristin Vander Kooi	

Contact Information/Program Administration

Chief Executive

The **City of Sun Prairie'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:	Aaron Oppenheimer
Email:	aoppenheimer@cityofsunprairie.com
Phone:	608-825-1193

Transportation Manager

The **City of Sun Prairie's** Transportation Manager will ensure implementation of the **City of Sun Prairie's** federally funded transportation program. The Transportation Manager has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **City of Sun Prairie's** Chief Executive.

Name:	Paul Woodward
Email:	paul@runninginc.net
Phone:	608-637-2599

Civil Rights Coordinator

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

Name:	Sandy Xiong
Email:	sxiong@cityofsunprairie.com
Phone:	608-825-0893

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

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

Notice to the Public¹

The **City of Sun Prairie**'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

CITY OF SUN PRAIRIE

- The **City of Sun Prairie** 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 the **City of Sun Prairie**
- For more information on the **City of Sun Prairie's** civil rights program, and the procedures to file a complaint, contact Sandy Xiong, (for hearing impaired, please use Wisconsin Relay 711 service); email sxiong@cityofsunprairie.com; or visit our administrative office at 300 E. Main Street, Sun Prairie, WI 53590. For more information, visit 608-825-1193.
- 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 608-825-1193.
Si se necesita informacion en otro idioma de contacto, 608-825-1193.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-825-1193.

City of Sun Prairie's Notice to the Public is posted in the following locations:

- Agency Website: <https://cityofsunprairie.com/1163/Title-VI>
- Sun Prairie City Hall, 300 E. Main Street, Sun Prairie, WI 53590, 1st floor
- Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- Other: _____

¹Title VI regulations require informing customers and the public of their rights under Title VI regulations by posting a Title VI public notice. The Title VI notice must include:

- A statement that the agency operates programs without regard to race, color or national origin.
- 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.
- Information on how to request Title VI information in another language, if required.

The Public Notice should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities.

Complaint Procedure

The **City of Sun Prairie's** Complaint Procedure is made available in the following locations:

- ✓ City of Sun Prairie Website: <https://cityofsunprairie.com/1163/Title-VI>
- ✓ Sun Prairie City Hall, 300 E. Main Street, Sun Prairie, WI 53590, 1st floor

Any person who believes they've been discriminated against on the basis of race, color, or national origin, religion, gender, disability or age by the **City of Sun Prairie** may file a complaint by completing and submitting the **City of Sun Prairie's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City of Sun Prairie**.

The **City of Sun Prairie** investigates complaints received no more than 180 business days after the alleged incident. The **City of Sun Prairie** will process complaints that are complete.

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

The **City of Sun Prairie** has 90 business days to investigate the complaint. If more information is needed to resolve the case, the **City of Sun Prairie** may contact the complainant.

The complainant has 14 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 14 business days, the **City of Sun Prairie** 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/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 14 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, 608-825-1193.

Si se necesita informacion en otro idioma de contacto, 608-825-1193.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau, 608-825-1193.

SECTION III: COMMENT DETAILS

Transit Service: Bus Paratransit Shared-Ride Taxi

(Choose one, as applicable)

Date of Occurrence:

Time of Occurrence:

Name/ID of Employee(s) or Others Involved:

Vehicle ID/Route Name or Number:

Direction of Travel:

Location of Incident:

Mobility Aid Used (if any):

If above information is unknown, please provide other descriptive information to help identify the employee:

Description of Incident:

As applicable, explain as clearly as possible what happened and why you believe you were discriminated against. If more space is needed, please add additional pages.

SECTION IV: FOLLOW-UP

May we contact you if new need more details or information?

What is the best way to reach you? (choose one)

Phone

Yes

No

Email

Mail

If a **phone call** is preferred, what is the best day and time to reach you? _____

SECTION V: DESIRED OUTCOME

What steps have you have taken to address the conflict or problem? _____

What type of corrective actions took place? _____

What remedy are you seeking? _____

SECTION VI: ADDITIONAL INFORMATION

Have you previously filed a complaint with this agency?

Yes

No

Have you filed this complaint with any other Federal, State or Local agency, or with any Federal or State Court?

Yes

No

If yes, to the question above, list all agencies contacted: _____

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

Name: _____

Agency: _____

Address: _____

Phone: _____

Email: _____

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the **City of Sun Prairie**:

Complainant Signature

Date

Print Your Name

List of Transit Related Title VI Investigations, Complaints and Lawsuits²

The **City of Sun Prairie** maintains a list or log to track and resolve all complaints, investigations and lawsuits, pertaining to its transit-related activities.

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)	Complainant's Name/Address	Basis of Complaint³	Summary Complaint Description	Status	Action(s) Taken
Investigations						
Complaints						
Complainmt	Mar 1, 2016	N/A	Blind man was told service was reserved for school children during specific hours	Also filed with DOT/Dane County DHHS	Closed	Complaint closed – no violation if all riders are being denied during peak times
Lawsuits						

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

³**Basis of Complaint:** Specify Race, Color, National Origin, Religion, Gender, Disability, Age, Other

Public Participation Plan

Strategies and Desired Outcomes

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

- Provide for early, frequent and continuous engagement by the public.
- Expand traditional outreach methods. Think outside the box: identify community leaders and visit community organizations.
- Select accessible and varied meeting locations and times.
- Employ different meeting sizes and formats.
- Provide childcare and food during meetings, if possible.
- Use social media in addition to other resources as a way to gain public involvement.
- Provide publications that serve LEP (Limited English Proficient) populations.

Public Outreach Activities

The direct public outreach for assessing transit needs conducted by the **City of Sun Prairie** are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to WisDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc. In addition, the Transit Commission continually seeks input from a variety of community organizations including the School District, Senior Center, Dane County, City of Madison, etc.

Event Date	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
January 21, 2021	Public Hearing	Public notice, Social Media	Regular Public Meetings	Public Hearing upon adoption of Title VI Plan
2018 - 2019	Community Comprehensive Plan Update	Public notices, social media	Meetings, survey, focus groups	See Comp Plan Update Public Participation Plan
February 8, 2018	Meet the Mayor	Public Notice, Social Media	Informational Meeting and Listening Session	Special guest: City of Madison Council Member Samba Baldeh
January 2018 - present	Polco	Online posting of questions for resident input	Civic Engagement Software	Cross-referenced against voter registration database
September 20, 2016 – June 2017	City Council Creation of Ad Hoc Transportation Committee	Public Notice, Website recruitment	Regular publicly noticed meetings	See committee minutes

Event Date	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
August 2015 – April 2017	City Council Creation and Action of Diversity Ad Hoc Committee	Public Notice, Website recruitment	Regular publicly noticed meetings with public feedback meetings in each of the four districts	See Diversity Committee final report dated April 1, 2017
Jan-Dec 2013	Listening Sessions with local Church representatives	Personal invitations	Individual meetings with the City Administrator	One-on-one meetings with representatives
2008	Comprehensive Plan survey	random sample of 1,122 households	UW Extension at UW-River Falls	45% (507) completed and presented to Plan Commission and Council
June 2005	Transit Interest Survey	Survey distributed to targeted local businesses	Employees of businesses written replies	Information presented to Transit Commission
February 2005	Express Commuter Bus Survey	Special Newsletter mailed to each resident	Postage-paid survey or completion online	967 responses received and presented to Transit Commission

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **City of Sun Prairie** 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.

The **City of Sun Prairie's** 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

This document uses data from the US Census and the American Community Survey (ACS) to provide a detailed LEP analysis for the service area of the **City of Sun Prairie, WI**. The ACS is an ongoing survey that provides data every year giving communities the current information they need to plan services and investments. The ACS publishes data in many forms on the Census Bureau American Fact Finder website (<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>)

Item #1: LEP Four Factor Analysis

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

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

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) encounters LEP persons.

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.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

The summary below discusses how the **City of Sun Prairie's** program and services impact the lives of persons within the community. The **City of Sun Prairie** will specify the community organizations that serve LEP persons, if available.

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the **City of Sun Prairie** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI/ADA and LEP principles.

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1 – Demography

The City of Sun Prairie contracts with a transit provider to provide shared-ride taxi (SRT) service. The contractor/transit provider provides service for the entire population of the City of Sun Prairie, WI in Dane County. County population estimates for 2017 reports a population of 32,933. The most up-to-date population estimate from the American Community Survey (ACS) reports a population 29,360 for 201-2016 5-year estimates. According to this information, the City of Sun Prairie is below the Safe Harbor threshold using the category of “Speak English less than very well”. The ACS data shows that 2.7% of the city’s population indicates that they “speak English less than ‘very well’”. The largest LEP population is Spanish, which represents 1.3% of the population (361). The second largest population is Hmong which make up .8% of the population (227).

Factor 2 – Frequency

The City of Sun Prairie’s contractor/transit provider provides rides to 62,433 persons per year for shared-ride taxi service. While formal data has not been collected, the contractor employs several strategies to provide open access to LEP persons.

- (1) the contractor logs LEP encounters to record where the rider(s) live and where they tend to go. This log will be used for long-term planning,
- (2) drivers are reminded that most of the time our riders, even if they cannot communicate in English, are able to point at a map, or are able to pull out a written sheet of paper with an address on it,
- (3) several drivers and dispatchers on staff speak Spanish. Spanish is the most frequently encountered native language spoken by our LEP riders. Spanish speaking staff are not on staff at all hours of the day, however the contract can arrange a quick interview between the LEP rider and our Spanish speaking staff member for any difficult LEP encounter, and
- (4) our contractor has the language line phone number available at all dispatch stations.

Factor 3 – Importance

The City of Sun Prairie and our contractor/transit provider 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.

The City of Sun Prairie has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

Factor 4 – Resources and Costs

Even though the City of Sun Prairie does not have a separate budget for LEP outreach, the city has worked with our contractor/transit provider to implement low cost methods of reaching LEP persons.

For example, the City of Sun Prairie has Spanish, Hmong and Hindi-speaking persons on staff. In addition, the contractor/transit provider has identified bilingual dispatchers and drivers (Spanish). This has ensured that riders in the identified language group of Spanish are provided with an expected level of service delivery.

The City has provided written translation of vital documents relating to the Shared-ride Taxi Program for each eligible LEP language group and such action under the DOJ's Safe Harbor Provision should be considered strong evidence of compliance with the written translation obligations.

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

The City of Sun Prairie has Spanish and Hmong -speaking persons on staff. In addition, we work with our contractor/transit provider to ensure mechanisms are in place to reach LEP persons in the service area. As needed, the City will develop special brochures to assist LEP populations in understanding City services including the transportation service. The city's website provide for translation of all material regarding the program. Additional languages are available to staff through the AT&T language line.

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

The City of Sun Prairie and its contractor/transit provider inform LEP persons of the availability of language assistance services through the City's website and other public posting methods. We strive to employ multilingual staff as well as create and post multi-language announcements, posters and other information.

The City of Sun Prairie and our contractor will also continue to identify and reach out to the LEP population through identified community leaders and posting opportunities for public input at local stores or markets catering to immigrants/non-English speaking populations.

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

The City of Sun Prairie meets with our contractor/transit provider several times a year to ensure the Title VI requirements are met. The Contractor is expected to provide statistics on the population served including LEP participants.

Annually the Transit Commission reviews the Title VI plan with staff and the contractor. Discussion includes accomplishments and identifies any challenges which require further action.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The City of Sun Prairie had discussed with our contractor/transit provider the need to educate its employees on how to meet the needs of LEP populations. New employees of the contractor/transit provider review the needs of clients served and how best to meet their needs during their orientation period. If a driver, dispatcher or employee of the contractor/transit provider needs further assistance related to LEP riders, her/she will work with the Transit Manager to identifying strategies to meet the language needs of the riders/traveling public.

City of Sun Prairie staff are provided resources to access when the needs arise. These services include current staff who are fluent in languages other than English, a list of interpreters for American Sign Language, and a quick reference guide on how to access the AT&T Languge telephone line.

Minority Representation Information

A. Minority Representation Table

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

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Two or More Races
Population	88%	3.9%	7.8%	5.2%	.3%	.2%
Transit Commission	100%	0%	0%	0%	0%	0%
2018 Comp Plan Steering Committee	83%	6%	11%	0%	0%	0%
All Other City Boards and Commissions	97%	.4%	6.5%	3.3%	.4%	0%

B. Efforts to Encourage Minority Participation

The **City of Sun Prairie** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City of Sun Prairie** encourages participation of all its citizens. As of September 2020, an analysis of the races residing in the **City of Sun Prairie** Transit Commission were reviewed and found to be under-represented. As vacancies on boards, committees and councils become available, the **City of Sun Prairie** will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, the **City of Sun Prairie** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City of Sun Prairie** will use creative ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and providing transportation and child care, if needed for its members.

The **City of Sun Prairie** is committed to using a variety of methods to reach out to citizens who may be interested in serving on boards/commissions/committees. Advertising will be done through the City's website and electronic newsletters; community leaders are identified by staff and elected officials and encouraged to apply for vacant positions; and an online interest form can be completed at any time to indicate an interest for future vacancies.