

## **NOTICE OF PROPOSED GUIDANCE DOCUMENT**

### **DTIM BTLRRH 69**

Pursuant to Wis. Stat. s. 227.112, the Wisconsin Department of Transportation is hereby seeking comment on DTIM BTLRRH 69, 49 U.S.C. 2000d, a proposed guidance document.

### **PUBLIC COMMENTS AND DEADLINE FOR SUBMISSION**

Comments may be submitted to the Wisconsin Department of Transportation for 21 days by:

1. Department's website: <https://appengine.egov.com/apps/wi/dot/guidance-docs?guidDocId=DTIMBTLRRH69>

2. Mailing written comments to:

Division of Transportation Investment Management  
Wisconsin Department of Transportation  
4822 Madison Yards Way  
PO Box 7913  
Madison, WI 53707- 7913

### **WEBSITE LOCATION OF FINAL GUIDANCE DOCUMENT**

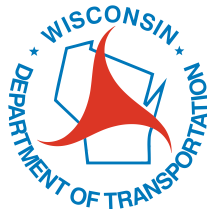
The final version of this guidance document will be posted at [wisconsin.dot.gov](http://wisconsin.dot.gov) to allow for ongoing comment.

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# Title VI Handbook for Transit

Wisconsin Department of Transportation  
Division of Transportation Investment Management (DTIM)  
**Bureau of Transit, Local Roads, Rails and Harbors (BTLR)**



All entities who receive Federal Transit Administration (FTA) grant dollars either directly from the FTA or through the Wisconsin Department of Transportation are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation's implementing regulations. This handbook provides technical assistance of the Title VI compliance requirements.

*March 28, 2019*

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## A. BACKGROUND

Any entity receiving federal dollars, either directly from the Federal Transit Administration (FTA) or through the Wisconsin Department of Transportation (WisDOT), Division of Transportation Investment Management (DTIM), Bureau of Transit, Local Roads, Rails and Harbors (BTLR), must not discriminate based on factors which include, but are not limited to race, ethnicity, age, religion, disability status or gender.

This handbook specifically addresses discrimination prohibited based on Title VI of the 1964 Civil Rights Act, a federal statute. If an agency is found in violation of Title VI, that agency may lose its federal funding.

The exact language prohibiting discrimination in Title VI reads: “No person in the United States, shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

## B. TITLE VI DEFINITIONS

**Color:** Skin color or complexion

**Disparate Treatment:** Refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of their race, color or national origin.

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

**National Origin:** A person’s, or his or her ancestor’s, place of birth. May also refer to the physical, cultural or linguistic characteristics associated with ethnicity or ancestry.

**Race (as defined by the U.S. Census):** A social classification of people which includes, at a minimum, White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. (Based on the demographics for your area, other races may be included.)

**Title VI Discrimination:** Refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

## C. RECIPIENT TYPES AND RESPONSIBILITIES

**Designated Recipient:** An entity designated by the chief executive officer of a state, responsible local official, or publicly owned operators of public transportation to receive and apportion grant funds made available by Congress and FTA.

**Direct Recipient:** Any public agency authorized to receive program funds directly from FTA.

**Subrecipient:** An agency receiving grant funds through the Wisconsin Department of Transportation, DTIM, Bureau of Transit, Local Roads, Rails and Harbors (BTLR) or another Designated Recipient.

The Bureau of Transit, Local Roads, Rails and Harbors (BTLR), as a *Designated Recipient* of FTA funds for the State of Wisconsin, receives, administers, and allocates funds to subrecipients. Responsibilities include monitoring subrecipients' compliance with Title VI, collecting Title VI plan documents, and providing Title VI reports directly to FTA.

*Wisconsin's large urban (over 200,000 population) transit systems*, such as Milwaukee County Transit System and Madison Metro are also *Designated Recipients* and report directly to FTA.

*Wisconsin's small urban (50,000 to 200,000 in population) transit systems*, such as Eau Claire Transit, Fond du Lac Area Transit, Green Bay Metro, Valley Transit, and Kenosha Transit are also *Designated Recipients* and report directly to FTA.

*Grantees and/or Subrecipients* - Many of Bureau of Transit, Local Roads, Rails and Harbors (BLTR) grantees receive FTA funds through WisDOT or another *Designated Recipient*. These grantees and/or subrecipients must submit a Title VI plan and program documents to the entity that provided them with FTA funds.

Note: Subrecipients are responsible for ensuring their third party contractor (transit provider), lessee or any participant at any tier of the FTA funded Project follows its respective Title VI plan and complies with Title VI provisions. A third party contractor (transit provider), lessee or any other participant at any tier of the Project is not required to prepare or submit a Title VI plan. At a minimum, however, such entities are obligated to be familiar with and adhere to the subrecipient's Title VI Plan and should post the subrecipient's Title VI Notice to the Public (**Appendix 2**) in their vehicles, if applicable.

*Metropolitan Transportation Planning Organizations (MPOs)* – MPOs that receive Federal planning money from WisDOT shall submit a Title VI plan to the State as the primary recipient from whom they receive funding.

### **Designated Recipient's Monitoring of Subrecipient's Title VI Plan**

It is important to note that if a subrecipient (you) is not in compliance with Title VI, then the designated recipient (WisDOT), is also not in compliance.

The Designated Recipient is responsible for documenting that the subrecipient is in compliance with Title VI, unless the subrecipient also receives funds directly from FTA (is a Direct Recipient) in which case the Title VI oversight responsibilities belong to FTA.

To track compliance with Title VI, WisDOT will:

- Document that the subrecipient is complying with the general requirements of Title VI and any other specific requirements that apply to that subrecipient.
- Collect and store subrecipient's Title VI plan documents on a schedule set by the Designated Recipient (WisDOT).
- Submit complaints and other Title VI information to FTA as requested.

## D. GENERAL TITLE VI REQUIREMENTS

If any of your programs or activities receives federal funding, then all of your programs and activities must comply with Title VI. Any agency receiving federal dollars either directly from FTA, indirectly through WisDOT, or both, must:

- Ensure that the level and quality of transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in transportation decision-making without regard to race, color or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency;
- Prepare and submit a Title VI Plan.

### Timelines

Subrecipients must submit a copy of their Title VI plan on a schedule determined by WisDOT.

Subrecipients are encouraged to review and update their plan on an annual basis. As applicable, subrecipients should meet with its third party contractor (transit provider) or lessee on an annual basis to ensure compliance with Title VI plan requirements.

## E. SPECIFIC REQUIREMENTS

Please see the Appendices for templates and samples of forms, notices and procedures.

### Title VI Plan Requirements Checklist

1. Evidence of **Approval of Title VI Plan**
2. **Title VI Notice to the Public**
3. **Complaint Procedures**
4. **Complaint Form**
5. List of transit-related **investigations, complaint and lawsuits**
6. **Public Participation Plan**
7. **Language Assistance Plan**
8. **Minority Representation Table**

*For recipients constructing a facility, in addition to items 1-8, submit 9*

9. **Title VI (Facility Location) Equity Analysis**

*For all fixed route transit providers, in addition to items 1-8, submit 10 and 11.*

10. **Fixed Route Service Standards**

## 11. Fixed Route Service Policies

*For Metropolitan Transportation Planning Organizations (MPOs), in addition to items 1-8 (and items 10 and 11 if the MPO is a provider of fixed route public transportation), submit*

## 12. MPO Demographic Data, Analysis and Procedures

# F. TITLE VI PLAN DETAILS AND EXAMPLES

## 1. Evidence of Approval of Title VI Plan

The subrecipient must provide evidence of approval of the Title VI plan (**Appendix 1**).

A copy of a signed policy statement, board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions, reviewed and approved the Title VI plan.

Subrecipients are encouraged to use a log to track/record Title VI plan updates and to identify contact information.

## 2. Title VI Notice to the Public

The subrecipient must inform customers and the public of their rights under Title VI regulations by posting a Title VI notice (**Appendix 2**). 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. This includes such items as 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

At a minimum, the notice must be posted in the following locations:

- ✓ On the agency's website
- ✓ In public areas of the agency's offices (reception desk, public meeting rooms, etc.)

Best practice guidance also suggests posting or printing notices in other areas such as:

- ✓ Inside vehicles (cars, vans, buses, rail)
- ✓ In and around transit shelters and stations
- ✓ In rider guides
- ✓ In bus schedules

### 3. Complaint Procedure

The subrecipient must have a clear and consistent procedure for responding to customer complaints on Title VI issues (**Appendix 3**). The procedure must be made available upon request. The procedure should include:

- ✓ An explanation of what specific issues are covered by the procedure
- ✓ How to file the complaint (including timelines and access to a complaint form)
- ✓ To whom to submit the complaint
- ✓ How the agency will respond to the complaint (including timelines)
- ✓ If an investigation of the complaint is conducted, how the customer will be informed of the outcome of the investigation
- ✓ A notice that the customer may file a complaint directly with FTA including FTA contact information
- ✓ An internal system or log for tracking complaints (issue, dates, findings, etc.)
- ✓ How language access will be provided to LEP populations, meeting the Safe Harbor Threshold.

At a minimum, the Complaint Procedure must be posted on the agency website and made available in hard copy in the central office.

### 4. Complaint Form

The subrecipient must provide a Customer Complaint Form (**Appendix 4**). The form must include fields for:

- ✓ The complainant's name and contact information
- ✓ Identification of the Title VI protected classes - (race, color, national origin) involved in the complaint. (The form may include other protected classes such as age, disability, and gender, and the complainant can choose one or more of these other protected classes as part of the complaint.)
- ✓ Date(s) of the alleged discrimination
- ✓ An explanation of the alleged discriminatory act or behavior

At a minimum, the Complaint Form must be posted on the agency website and made available in hard copy in the central office. The form must also be made available in appropriate languages for LEP populations, meeting the Safe Harbor threshold.

### 5. List of Transit-Related Investigations, Complaints and Lawsuits

The subrecipient shall maintain a list or log of all investigations, complaints, and lawsuits, pertaining to their transit-related activities (**Appendix 5**). The list, updated with all new events filed since the last submission, must be submitted with the Title VI Plan.

The list or log shall include dates, a summary of allegation(s), status, actions taken by subrecipient in response, and the final outcome (if resolved) for:



- ✓ Active investigations by FTA, the agency itself, or any other entity, which are based on race, color or national origin discrimination allegation(s).
- ✓ Lawsuits which are based on race, color or national origin discrimination allegation(s).
- ✓ Complaints naming the subrecipient which are based on race, color, or national origin discrimination allegation(s).

As this information must be submitted to WisDOT, it is best to keep an on-going log of complaints entered as the complaints come in. Information will be more accurate, and the upkeep of the log easier.

## 6. Public Participation Plan

The subrecipient must have a written **Public Participation Plan** which explicitly describes the proactive strategies, procedures, and desired outcomes underpinning their public participation activities (**Appendix 6**). *Subrecipients are encouraged to annually review and update their Public Participation Plan. This log of outreach activities and planned future activities are a required element of the Title VI plan submittal to WisDOT.*

It is imperative to provide opportunities for the public to be involved in proposed transportation decisions. This means adjustments or modifications to programs or services should be made by gathering input based on the concept of being inclusive with regard to minority and limited-English proficient (LEP) populations within your community.

Subrecipients are allowed flexibility in determining how, when and how often specific public participation activities should take place and which specific measures are appropriate. Plans should be based on the subrecipient's demographics, service under consideration, programs affected or proposed, resources available, etc., and should:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Promote inclusive participation of low-income, minority, LEP individuals and people with disabilities. FTA has developed a Circular, 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients," that includes examples of effective public participation strategies  
[http://www.fta.dot.gov/documents/FTA\\_EJ\\_Circular\\_7.14-12\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_EJ_Circular_7.14-12_FINAL.pdf)
- ✓ Comply with the public participation requirements of 49 U.S.C Sections 5307(b). FTA requires programs or projects to be developed with public participation and 5307(c)(1)(I) requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.

### Tips for creating and implementing Public Participation Plans

- Select accessible and varied meeting locations and times
- Consider providing childcare and food during meetings
- Use social media in addition to other resources as a way to gain public involvement
- Employ different meeting sizes and formats

- Consider radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

## 7. Language Assistance Plan

The subrecipient must have a written Language Assistance Plan (**Appendix 7**).

The subrecipient shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP). Failure to provide this could lead to a claim of national origin discrimination.

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.

### *LEP Safe Harbor*

The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the subrecipient must provide written translation of vital documents for the non-English users.

Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (**Appendix 2**), Complaint Procedure (**Appendix 3**), Complaint Form (**Appendix 4**), and ADA paratransit eligibility forms.

To determine if an individual is entitled to language assistance and what specific services are appropriate, US DOT has provided an assessment tool, the *Four Factor Analysis*. Per DOT LEP guidance at: <https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>

### *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?

Demographic data by County is available at:

WisDOT website <http://wisconsindot.gov/Documents/doing-bus/local-gov/astnce-pgms/transit/compliance/title6-lep.pdf>

US Census Bureau American Community Survey website

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

- ✓ **Factor 2: Frequency:** How often do LEP persons come into contact with the service or program (your public transportation services)?  
Optional sample LEP tools/forms are provided for use at the end of **Appendix 7**.
- ✓ **Factor 3: Importance:** How does the program, service or activity affect people's lives (transportation)?
- ✓ **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

At a minimum, the Language Assistance Plan shall include (**Appendix 7**):

*Note: **Appendix 7** includes steps for completing the Four Factor Analysis as well as the other required 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

Tips for implementing LEP plans

- Publish timetables and route maps in languages other than English
- Provide pictograms and other symbols
- Strive for a multilingual staff
- Create and post multi-language announcements, posters and other information

## 8. Minority Representation Information

A subrecipient with transit-related, non-elected planning boards, advisory councils, or committees selected by the subrecipient must provide a table depicting the membership of those organizations broken down by race (**Appendix 8, page 1**).

Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

A sample form which can be used to collect this data can be found in **Appendix 8, page 2**.

County demographic data by race is available at on the WisDOT Transit Title VI website.

## 9. Title VI (Facility Location) Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

Prior to the actual construction of a facility there are many steps involved in the planning process. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The analysis must be done before the selection of the preferred site (**Appendix 9**).

**Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.**

Key points:

- The subrecipient shall conduct a Title VI Equity Analysis during the planning stage of the project to ensure a location is selected in a non-discriminatory manner.
- When evaluating locations, the subrecipient must investigate other facilities that have been built in the area with similar impact to determine if there are any cumulative adverse impacts.
- If the selected location of the constructed facility results in “disparate treatment” the subrecipient must show both substantial legitimate justification for locating the facility there and evidence that there are no alternative locations.

## 10. Fixed Route Service Standards

**Fixed route:** Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, or the location of routes in a non-discriminatory manner. The subrecipient must not make service decisions on the basis of race, color, or national origin (**Appendix 10**).

Effective practices to fulfill the Service Standard requirements include:

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode

## 11. Fixed Route Service Policies

**Fixed route:** Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin (**Appendix 11**).

Effective practices to fulfill the Service Policies requirements include developing written policies covering each of the following service indicators:

### 1. *Transit amenities for each mode*

- ✓ Items of comfort, convenience and safety which are available to the general riding public such as seating, shelters, canopies, signs, maps, schedules, escalators, elevators, and waste receptacles. Although there may be different policies for different modes of transportation, amenities policies address how these amenities are distributed within a transit system in a way that ensures all riders have equal access to the amenities.

### 2. *Vehicle assignments for each mode*

- ✓ The process for placing transit vehicles into service depots and on routes throughout the transit provider's system. Policies may be based on vehicle type and service type.

## 12. MPO Demographic Data, Analysis and Procedures

Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012)

<http://www.fta.dot.gov/civilrights/12328.html> outlines the requirements for MPOs.

MPOs that receive Federal planning dollars from WisDOT shall submit a Title VI plan to the State as the primary recipient from which they receive funding.

For Metropolitan Transportation Planning Organizations (MPOs), in addition to items 1-8 (and items 10 and 11 if the MPO is a provider of fixed route public transportation), the MPO shall also submit to WisDOT the following (**Appendix 12**):

- a. A demographic profile of the metropolitan area that includes identification of the locations of minority populations in aggregate.
- b. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.
 

*This information helps ensure members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow minority populations to participate fully in the process.*
- c. Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that

analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO.

- d. Analysis of the impacts identified in (c) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

If the MPO is a direct recipient, the MPO will be required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).

Note: All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance.

## G. Resources

Please see the web addresses below for more information.

### ***WisDOT Title VI Information***

Title VI Compliance

<http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx>

### ***Federal requirements***

FTA Circular 4702.1B (October 1, 2012)

<http://www.fta.dot.gov/civilrights/12328.html>

Overview of Final Circular 4702.1B Title VI Requirements and Guidelines for Recipients

[http://www.fta.dot.gov/documents/Title\\_VI\\_Overview\\_4702.1B\\_11.05.12\\_ER.pdf](http://www.fta.dot.gov/documents/Title_VI_Overview_4702.1B_11.05.12_ER.pdf)

Limited English Proficiency (LEP), Presidential Executive Order 13166 (August 11, 2000)

<http://www.justice.gov/crt/about/cor/Pubs/eolep.php>

### ***Other helpful resources***

DOT LEP Guidance

<https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>

American Fact Finder

<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

Fair Equity Analysis Ridership Data 4702.1B

[http://www.fta.dot.gov/documents/Title\\_VI\\_Fare\\_Equity\\_10.25.12\\_BG.pdf](http://www.fta.dot.gov/documents/Title_VI_Fare_Equity_10.25.12_BG.pdf)

Environmental Justice Policy Guidance for Federal Transit Administration Recipients 4703.1

[http://www.fta.dot.gov/documents/FTA\\_EJ\\_Circular\\_7.14-12\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_EJ_Circular_7.14-12_FINAL.pdf)

## H. Appendices

Appendices are available on the WisDOT website:

<http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx>

- Appendix 1. Evidence of Policy Approval
- Appendix 2. Notice to the Public
- Appendix 3. Complaint Procedure
- Appendix 4. Complaint Form
- Appendix 5. List of Complaints and Lawsuits
- Appendix 6. Public Participation Plan
- Appendix 7. Language Assistance Plan
- Appendix 8. Minority Representation Information
- Appendix 9. Facility Location Equity Analysis
- Appendix 10. Fixed Route Service Standards
- Appendix 11. Fixed Route Service Policy
- Appendix 12. MPO Demographic Data Analysis and Procedures