

City of Portage

Title VI/ADA Nondiscrimination Plan

Revised on: 05/14/2026

Adopted by: Portage City Council

Original Plan

Adopted on: May 22, 2014

This plan is hereby adopted and signed by:

City of Portage

Executive Name/Title: Matt Fiene, Mayor

Executive Signature:

Matt Fiene

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

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

Policy Statement

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

The **City of Portage** receives federal financial assistance to provide transportation service in City of Portage. Information on the transportation services is available on the **City of Portage** website at <https://www.portagewi.gov/taxi-1>

Policy Updates – Activity Log

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

The **City of Portage** will discuss Title VI/ADA Nondiscrimination Plan requirements with its third-party transit provider on an annual basis to ensure compliance with civil rights requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
April 23, 2026	Updated Title VI/ADA Plan per WisDOT requirement. Revisions Included updated Complaint Procedure, updated Language Assistance Plan and Demographic Representation Information with current US Census data	Jennifer Becker	Provide a copy of the updated Title VI Plan/Notice of Nondiscrimination to the Transit Provider.
February 18, 2021	Update Title VI Plan – updated Complaint Form, US Census Data	Jean Mohr	
May 8, 2021	Review Title VI Plan with Running, Inc.	Jean Mohr	
May 22, 2014	Develop Title VI/ADA Plan	Jean Mohr	

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

Contact Information/Program Administration

Chief Executive

The **City of Portage'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:	Rebecca C. Ness, City Clerk
Email:	Rebecca.ness@portagewi.gov
Phone:	608-810-4103

Civil Rights Coordinator

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

Name:	Jennifer M. Becker, Finance Director
Email:	Jennifer.becker@portagewi.gov
Phone:	608-810-4102

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

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

Notice of Nondiscrimination

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

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

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

The **City of Portage's** *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website - <https://www.portagewi.gov/taxi-1>
- ✓ Public area of the agency office - City Hall, 115 W. Pleasant St., Portage, WI 53901
- ✓ Inside vehicles

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **City of Portage** at 608-810-4102 if additional information is needed in another language.

To view a copy of the **City of Portage's** *Notice of Nondiscrimination*, please see **Appendix 1**.

Complaint Procedure, Complaint Log, and Complaint Form

The **City of Portage**, as a recipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/ADA Nondiscrimination complaints and make the procedures available to the public upon request.

Any person, group or firm that believes they've been discriminated against on the basis of race, color, national origin, sex, age, or disability by the **City of Portage** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **City of Portage** activities. Complaints can originate as a result of project and program impacts on individuals or groups. Examples include social and economic impacts such as access to programs, activities and services, failure to maintain facilities and vehicles, traffic, noise, air quality, and accidents.

The **City of Portage's** complaint procedure shown in **Appendix 2** is available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Portage City Hall – Finance Director & City Clerk's Offices

Civil Rights Investigations

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

Appendix 3 is the **City of Portage's** *Complaint Log* procedure and tracking mechanism to investigate, track and resolve complaints.

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

Complaint Form

City of Portage's *Complaint Form* is shown in **Appendix 4**.

Public Involvement Plan

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

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

City of Portage's *Public Involvement Plan* is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

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

City of Portage's Limited English Proficiency (LEP) Plan is shown in **Appendix 6**.

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

Demographic Representation Information

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

City of Portage's Demographic Representation Information is shown in **Appendix 7**.

Notice of Nondiscrimination to the Public

City of Portage's *Notice of Nondiscrimination* is posted in the following areas:

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

Notice of Nondiscrimination

City of Portage

- ✓ The **City of Portage** is committed to ensuring that no person is excluded from the participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, sex, age, or disability in any and all programs, activities, or services administered by the **City of Portage** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the **City of Portage**.
- ✓ For information on the **City of Portage's** civil rights program, procedures to file a complaint, or request a reasonable modification contact 608-810-4103 (for hearing impaired, please use Wisconsin Relay 711 (1-800-947-6644), Jennifer.becker@portagewi.gov or visit our administrative office at 115 West Pleasant Street, Portage, WI 53901.
- ✓ Information is also available online at: <https://www.portagewi.gov/taxi-1>
- ✓ A complaint may also be filed directly with the following:
 - Wisconsin Department of Transportation (WisDOT), Senior Title VI and ADA Coordinator, Phone: (608) 266-8129, TTY (800) 947-3529, Fax: (608)267-3641, Email: taqwanya.smith@dot.wi.gov, 4822 Madison Yards Way, 5th Floor South, Madison, WI 53705. For more information, visit <https://wisconsin.gov/Pages/doing-bus/civil-rights/titlevi-ada/filingcomplaint.aspx>
 - U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: 1-888-446-4511 or 711(Relay), email: FTACivilRightsCommunications@dot.gov
- ✓ If information is needed in another language, contact 608-810-4103
Si se necesita informacion en otro idioma de contacto, 608-810-4103
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-810-4103

Website Statement:

The **City of Portage** operates its programs and services without regard to race, color, national origin, sex, age, or disability in accordance with Title VI of the Civil Rights Act, Americans with Disabilities Act (ADA), and related nondiscrimination authorities. For more information on the **City of Portage's** civil rights program, ADA obligations, and the procedures to file a complaint or make a reasonable modification, contact Jennifer.becker@portagewi.gov, 608-810-4103 For hearing impaired, please use Wisconsin Relay 711 (1-800-947-6644) or <https://wisconsinrelay.com>.

Complaint Procedure

The **City of Portage's** Complaint Procedure is available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
 - ✓ Portage City Hall – Finance Director or City Clerk's Offices
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Any person who believes they've been discriminated against on the basis of race, color, national origin, sex, age, or disability by the **City of Portage** may file a complaint by completing and submitting the **City of Portage's** Complaint Form.

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

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

Once the complaint is received, the **City of Portage** will review the complaint and work to resolve the complaint informally, if possible.

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

The **City of Portage** has **30** business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **City of Portage** 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, the **City of Portage** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, the complainant has **10** business days after the date of the letter or the LOF to do so.

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

If information is needed in another language, then contact 608-810-4103

Si se necesita informacion en otro idioma de contacto, 608-810-4103

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-810-4103

Complaint Log
List of Complaints, Investigations and Lawsuits²

The **City of Portage** maintains a log to track and resolve transportation related civil rights complaints, investigations, and lawsuits.

Check One:

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

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

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

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

Type Complaint Investigation Lawsuit	Date Complaint Received (Month, Day, Year)	Complainant's Contact Information Name/Phone/ Email/Address	Basis of Complaint ³	Summary Complaint Description	Action Taken/ Final Outcome if Resolved <small>List dates of action steps including the dates complaint/investigation begins and is administratively closed.</small>	Status Open/ Closed

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

³ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Sex, Age, Other.

Complaint/Comment Form

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

City of Portage
 115 West Pleasant St.
 Portage, WI 53901

You may also call us at 608-810-4102. Please make sure to provide your contact information in order to receive a response.

Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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Click or tap here to enter text.

Section B: Contact Information

Name <input type="text"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>
Email Address <input type="text"/>	

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

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section C: Type of Comment

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

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Transportation Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

Section D: Comment Details

Please answer the questions below regarding your comment

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

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

Click or tap here to enter text.

Section E: Follow-up

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

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

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

Click here to add your preferred time

Click here to add your preferred day

Have you filed a complaint with any other federal, state, or local agencies?

Yes

No

If yes, list agencies and contact information (agency name, address, email, phone).

Click or tap here to enter text

Section F: Desired Outcome

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

Click or tap here to enter text

Section G: Signature

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

Name Click or tap here to enter text

Date: Click to add date in the following format: Day/ month, year

Signature Click or tap here to enter text

Public Involvement Plan

The purpose of the **Public Involvement Plan** is to establish procedures that allow for, encourage, and monitor participation of all citizens within the **City of Portage** service area including low income and minority individuals, persons with disabilities, and those with limited English proficiency (LEP).

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

Goal

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

Strategies

To promote public participation, the **City of Portage** uses the following strategies, as appropriate.

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

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

Participation Techniques

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

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

Public Outreach Activities

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

The direct public outreach and involvement activities conducted by the **City of Portage** are summarized below. Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (e.g., information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities					
Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Staff Members Responsible	Notes
Ongoing	Website, Facebook, Twitter	Website and Social Media Materials	Website and Social Media Materials	Agency Staff	City of Portage website
Ongoing	Administrative Committee and City Council Meetings	City Hall Bulletin Board, City Website, newspaper and radio	Discuss Transportation Route Changes – Service and Fares	Jennifer Becker	
Various	Brochures and Posters	Library, City Hall	Brochures and Posters	Agency Staff	
Annual	Newsletter	Printed for pick up onsite and available on website	Printed annual onsite and posted on website	Jennifer Becker	
TBD	ADRC Meetings, Transportation Coordination Committee Meetings	Advertise Board Meeting on website	Public Meeting	Jennifer Becker	Planning this for 2026
TBD	Yearly Surveys	Printed survey and distributed to riders/program participants	Survey	Jennifer Becker	Planning this for 2026

Limited English Proficiency (LEP) Plan

Overview

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

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

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

Plan Summary

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

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

Plan Components

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

This plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the following:
 - ✓ **Demography** of LEP persons in the service area
 - ✓ **Frequency** of contact with LEP persons
 - ✓ **Importance** of language assistance services
 - ✓ **Resources and costs** to provide language assistance services
2. A description of language assistance services:
 - ✓ How language assistance services are provided.
 - ✓ How LEP persons are informed of the availability of language assistance services.
 - ✓ How the language assistance plan is monitored and updated.
 - ✓ How employees are trained to provide language assistance to LEP persons.

Meaningful Access - Four Factor Analysis

To prepare this plan, the **City of Portage** conducted a four-factor analysis which considers the following:

Factor 1 - Demography

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

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

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



Columbia County
LEP Data 2015 ...

The US Census Bureau – American Fact Finder (2011-2015) data show there are numerous languages spoken in Columbia County. Some of these languages include Spanish, German, Japanese, Hmong, Tagalog, other Native North American Languages, and Arabic. After English, the second largest language group is Spanish.

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

US Census data shows that in Columbia County with a population estimate of 53,505; 373 persons have identified themselves as Spanish speaking and “speaks English less than very well”. This language group is less than 1% and below the 5%, or 1,000 persons threshold of the population to be served. This means the **City of Portage** is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold.

In the future, if the **City of Portage** meets the Safe Harbor Threshold for additional language groups, it will consider providing written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

Frequency of contact with LEP persons.

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

The **City of Portage** and its contractor provide transportation service for the **City of Portage**.

The **City of Portage** reviewed the frequency with which its staff and contractor have or could have contact with persons with limited English proficiency in the conduct of **City of Portage** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. There have been approximately 10 encounters since program started, all were addressed with no follow up needed.

City of Portage's staff and contractor are trained on what to do when they encounter a person with limited English proficiency.

The **City of Portage** staff and its contractor tracks the number of encounters and considers adjustments to its outreach efforts to ensure meaningful access to all persons and specifically LEP and minority populations. The *Log of Language Assistance Encounters* is a tool to gather information on persons needing language assistance (**Appendix 7**).

Log of Language Assistance Encounters

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

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

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

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

Factor 3 – Importance

Nature and importance of language assistance.

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

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

Factor 4 – Resources and Costs

Resources available and overall cost to provide language assistance.

Given the few language assistance encounters, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request. Additionally, the **City of Portage** can contact state and local governments and community agencies for translation assistance or consider the use of a language translation services, as needed.

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

Overview - Language Assistance Services

City of Portage takes steps to provide meaningful access to LEP individuals who have difficulty communicating in English.

The **City of Portage** strives to offer the following measures:

- ✓ Post Title VI/ADA Nondiscrimination information on the **City of Portage** website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact the **City of Portage** to request information in another language.
- ✓ Day to day operations:
 - Utilize the *"I Speak" Language Identification Card* or posters to identify the language and communication needs of individuals.
 - Maintain a *Log of Language Assistance Encounters* to capture information on the frequency of contact with LEP persons to determine whether additional language assistance services are needed to ensure meaningful access by LEP persons.
- ✓ At public meetings or other community events:
 - Greet participants as they arrive at **City of Portage** public meetings or community events.
 - Use *"I Speak"* language identification cards at sponsored events.
 - Tools such as an *"I Speak" Language Identification Card* can gauge attendee's ability to speak and understand English. Although translation may not be able to be provided at an event it helps identify needs at future events.
 - Maintain a log of language assistance encounters at public meetings or other community events.
- ✓ Translation Services
 - The city will seek translation assistance from community organizations such as:
 - Columbia County – Human Services, Support Services
(608)742-9275, <https://www.co.columbia.wi.us/columbiacounty/hhs/Health-Human-Services/Support-Services>
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> This relay service is available in English-to-English, Spanish-to-Spanish (800-833-7813) and Spanish-to-English (877-490-3723).
- ✓ Utilize online resources such as Google Translate to assist with translation requests. A downside of this approach is accuracy therefore this option will be used on a limited basis. Instead, **City of Portage** will seek assistance from fluent speakers.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of documents/publications available upon request, within a reasonable time frame.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Public Outreach – Language Assistance Services

The following are measures **City of Portage** takes to inform the public of language assistance services:

- ✓ Post the Title VI/ADA *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact the **City of Portage** to request information in another language.
- ✓ When encountering persons not proficient in English, **City of Portage** staff will use the “*I Speak*” *Language Identification Card* to identify language and communication needs.
 - **City of Portage** may not be able to immediately accommodate or assist individuals self-identifying as a person not proficient in English but will seek means to follow up with individuals to address language needs as soon as possible.
- ✓ Review outreach activities and information gathered from *Log of Language Assistance Encounters* to determine whether additional language assistance services are needed.
- ✓ Utilize translation services such as:
 - Government and community organizations such as:
Columbia County – Human Services, Support Services, (608)742-9275,
<https://www.co.columbia.wi.us/columbiacounty/hhs/Health-Human-Services/Support-Services>
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features> This relay service is available in English-to-English, Spanish-to-Spanish (800-833-7813) and Spanish-to-English (877-490-3723).

Monitoring, Evaluating and Updating the Plan

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

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

Training Staff

The following training will be provided to **City of Portage** staff:

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

Appendix 7

Language Assistance Tools

"I Speak" Language Identification Card

"I Speak" Language Identification Card

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

Log of Language Assistance Encounters

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

Language Translation Request Log

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

Demographic Representation Information⁴

A. Demographic Representation Table⁵

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

The table below depicts US Census county population data by race in Columbia County and the membership of the **City of Portage's** transportation related non-elected committee/council/board.



Columbia County - Data by Race.pdf

Body	Caucasian	Hispanic/Latino	Black/African American	Asian American	Native American	Some Other Race	No Response
Columbia County Population	92.1%	3.6%	1.7%	0.8%	0.4%	1.46%	---
Portage City Council	N/A - Participation on the City Council is by election.						

B. Efforts to Encourage Participation

The **City of Portage** does not have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies. Membership on the Common Council is elected.

The **City of Portage** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As vacancies on non-elected committees, councils, and boards become available, the **City of Portage** will make efforts to encourage participation of minority community members.

To encourage participation the **City of Portage** will reach out to community organizations to connect with minority population groups in its service area. In addition, the **City of Portage** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

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

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