

TITLE VI PROGRAM

2025 Update



Title VI Program

Valley Transit – Appleton, WI

Adopted on: _____

Adopted by: Fox Cities Transit Commission

**FCTC minutes found in Attachment 1*

This policy is hereby adopted and signed by:

Valley Transit

Executive Name/Title: Ron McDonald, General Manager

Executive Signature: _____

Policy Statement

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

Title VI Plan Elements

Valley Transit's Title VI plan includes the following elements:

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

Note: Additional materials will be attached, if required.

Policy Updates – Activity Log

Valley Transit will review its policy at least once a year to determine if modifications are necessary. Modifications are noted in the log below.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks

Evidence of Policy Approval

Fox Cities Transit Commission approval of this Title VI Program is found in applicable meeting minutes at the end of this document.

Title VI Notice to the Public

Valley Transit's Notice to the Public is included below:

Notifying the Public of Rights Under Title VI

VALLEY TRANSIT

- ✓ Valley Transit 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 Valley Transit.
- ✓ For more information on Valley Transit's civil rights program, and the procedures to file a complaint, contact 920-832-5800, TTY Relay 7-1-1, email valley.transit@appleton.com; or visit our administrative office at 801 S. Whitman Avenue, Appleton, WI 54914. For more information, visit www.myvalleytransit.com
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 920-832-5800.

Valley Transit's Title VI notice is posted in the following locations:

- ✓ Agency website www.myvalleytransit.com
- ✓ Public area of Administrative Office
- ✓ Inside vehicles that transport passengers
- ✓ Route Map/Rider Guides and VT Connector brochures
- ✓ Downtown Transit Center

Discrimination Complaint Procedure

Valley Transit's Title VI Complaint Procedure is made available in the following locations:

- ✓ Website
 - ✓ Hard copy in Administrative Office and Downtown Appleton Transit Center
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Any person who believes she or he has been discriminated against based on race, color, or national origin by Valley Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Valley Transit investigates all complaints received no more than 180 calendar days after the alleged incident. Valley Transit will process complaints that are complete.

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

Valley Transit has five (5) calendar days to investigate the complaint. If more information is needed to resolve the case, Valley Transit may contact the complainant.

The complainant has ten (10) calendar 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 thirty (30) calendar days, Valley Transit can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, she/he has 180 calendar 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, contact 920-832-5800.

Discrimination Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to the question above, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race/Color/National Origin (<i>Related to Title VI of the Civil Rights Act of 1964</i>)				
<input type="checkbox"/> Disability (<i>Related to the Americans with Disabilities Act (ADA)</i>)				
Date of Alleged Discrimination (Month, Day, Year): _____				
<p>Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.</p> <div style="border: 1px solid black; height: 150px; margin-top: 10px;"></div>				
Section IV				
Have you previously filed a Discrimination complaint with this agency?			Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name: _____	
Title: _____	
Agency: _____	
Address: _____	
Telephone: _____	
Section VI	
Name of agency complaint is against: _____	

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

Signature and date required below:

Signature

Date

NOTE: COMPLAINT WILL NOT BE ACCEPTED WITHOUT A SIGNATURE.

Valley Transit's Title VI or ADA Officer will investigate all complaints. At the conclusion of our investigation, a letter of finding will be sent to the complainant. If our investigation determines that we were not in violation of Title VI or ADA, our letter will explain why we were in compliance. If it is determined that there was a violation, our letter will document the violation and the action that Valley Transit will take to become compliant.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by the nondiscrimination statutes we enforce. Any individual alleging such harassment or intimidation may file a complaint with Valley Transit or the Federal Transit Administration.

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

**Valley Transit Title VI/ADA Coordinator
801 S. Whitman Avenue
Appleton, WI 5491**

For office use only:

Date received by Valley Transit: _____

Received by: _____

Create database feedback record, upload this completed form and related documents.

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Valley Transit maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

✓ There have been no investigations, complaints and/or lawsuits filed against us during the report period.

_____ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Public Participation Plan

Process

An ongoing forum for public participation is offered during every Fox Cities Transit Commission (FCTC) public meeting. The FCTC is scheduled to meet two times each month with time provided for public participation on agenda items at each meeting. FCTC meetings are held during the operating hours of Valley Transit services to improve access for the public. The meeting location is the City of Appleton City Hall, which is located one block south of Valley Transit's downtown transit center. FCTC meeting start time has been adjusted to accommodate any persons who use the fixed route and better suit a rider's schedule.

Proposed fare and service changes are announced to the public by the means described in this section, and public input is solicited far enough in advance for Valley Transit to consider the comments and make revisions based on the comments. Valley Transit's Public Participation Policy is posted on its website as a resource to help community members understand how to submit comments and when they are considered by the FCTC commissioners prior to finalizing decisions. Public meetings are noticed in the local newspaper and other forums for service and fare changes as described in Public Participation Policy. Individuals and organizations can request notification of future meetings. An archive of agendas and meeting minutes are posted via a link on Valley Transit's website.

Beyond monthly FCTC meetings, several other methods are used to communicate with riders. Valley Transit Route Map/Rider Guide is a printed map with guidance for using services and includes information on how to contact Valley Transit, as well as the web address and social media platforms. Each year, over 20,000 route maps are printed and distributed throughout the community. Maps are available at several key destinations throughout the Fox Cities, on all transit vehicles, and at the main administrative office. Valley Transit also publishes brochures that describe specific programs and policies. These materials are available to riders at the main office (801 S Whitman Ave), downtown transit center, website (PDF), and are distributed to local agencies. These printed materials are mailed upon request at no cost.

Valley Transit's downtown transit center, located at 100 Washington Street, provides another communication avenue with riders. The transit center facility has a staffed customer service window. When no staff are available, a courtesy phone is available to speak with staff. The transit center has digital monitors and other displays containing travel information, notices to the public, contact information, and other announcements or resources applicable to the service. The transit center is centrally located in the service area and many routes pulse into the center for transfers between routes.

Each Valley Transit bus contains an info display area, brochure holders and interior ad space along the entire interior. Maps, brochures, flyers and notices are placed on buses for display to riders.

Valley Transit's website (www.myvalleytransit.com), Instagram, X, and Facebook page also provide information to the public. The website content includes information on bus trip planning, demand response programs, fares, contact info, board meeting agendas and minutes, detours, news/blog and

more. Public input is welcomed via the website and visitors are provided with several options for contacting Valley Transit (mail, email, web comment form, or phone). The website is also designed to be accessible, clear, and easy to use. A website plug-in called accessiBe is used to provide state-of-the-art features to enable a wider range of visitors with the tools and adjustments needed to view the content. The website also utilizes Google Translate to provide language options beyond English. The Riding dropdown offers a “How to Ride” page that includes a video in English and Spanish. A link to a printable plan language form that was created at the request of schools and non-profits who primarily serve non-English speaking populations or have English Language learners (ELL) as a part of their programing.

RideMyValleyTransit.com is a supplemental website that provides real-time bus location. In addition, this website informs riders of detours with dates and the duration of the effected routes. Users can also subscribe to receive text alerts that notify riders or the public of time sensitive announcements and any other useful information. Personal devices can translate this information into a recipients native or preferred language.

When invited to present in classrooms or at partner organizations, we teach all participants how to use Google Maps for trip planning. Smart phones default to their preferred language which deepens a student’s understanding of how to use Valley Transit, locate nearest bus stops, recognize bus schedules, and routes needed to get from start to destination.

Valley Transit’s planning process (Transit Development Plan - TDP) contains its own Public Participation Plan. The PPP is developed and managed by our Metropolitan Planning Organization (MPO) and identifies outreach efforts and public involvement opportunities. Techniques used to gain input from minority and LEP populations include involving stakeholders in the steering committee. This also helps to disseminate information to hard-to-reach populations. The MPO uses public notices in appropriate non-English languages and maintains contacts with local translators. TDP meetings are held at different locations that are accessible and reasonably welcoming to all residents. Our TDP collects direct input from organizations and advocacy groups that represent a variety of community interests. The participant list includes county health and human services staff, local libraries, Multicultural Coalition, Inc. Hope & Help Together Fox Cities, Hmong American Partnership and N.E.W. Hmong Professionals. Making the Ride Happen (non-profit), Casa Hispana, Appleton School District (including Even Start a combination of ELL classes and daycare), Lawrence University, World Relief, Partnership Community Health Center (non-profit), Hope Clinic, LEAVEN Fox Cities, Fox Valley Tech College, Fox Cities Chamber, Pillars, and Hmong American Partnership.

The TDP process occurs every 5 years. The results of the TDP drive Valley Transit major planning and policy decisions, so we place added effort to engage public participation during this critical process. Valley Transit will continue to work with our MPO to develop and implement public engagement techniques for each planning process.

Valley Transit’s ongoing public outreach efforts to engage the entire community, including minority and LEP populations, are led by our mobility manager. This position is tasked with partnering with community-based organizations, participating in community events/meetings and many other forms of continuous outreach. Evidence of outreach efforts is found in the table under ‘Public Outreach Activities’

below. Valley Transit' travel trainer position also plays a role in community outreach by participating in events/meetings and providing travel training resources to individuals and organizations across the Fox Cities. This direct staff contact with individuals and groups invites active participation and communication of transit issues and strives to help overcome barriers.

Strategies and Desired Outcomes

To promote inclusive public participation, Valley Transit will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent, and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide food during meetings, if possible
- ✓ Use social media in addition to other resources to gain public involvement
- ✓ Direct participation in local groups and efforts to improve communication with hard-to-reach populations
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

Valley Transit maintains a log/record of the various types of outreach activities it uses to promote public participation. On an annual basis, Valley Transit reviews its log of outreach activities to determine if additional or different strategies are needed to expand our reach for public participation.

The direct public outreach and involvement activities conducted by Valley Transit & ECWRPC are summarized in the table below. Efforts include *meetings, events, presentations, partnerships, surveys, focus groups, attendance at community events, etc.*

Event Date	Valley Transit Staffer(s)	Event	Date Publicized and Communication Method	Outreach Method	Notes
2 nd Saturday in September & Spring Banquet	VT MM & TT	Latinofest and Scholarship for a Cause Annual Gala	Annually	Booth at Event	Outreach to build trust in the Hispanic community alongside other community partners and resources
2 nd Thursday	VT MM & TT	Hispanic Interagency Meeting	Monthly	Updates about Valley Transit are provided to influencers and other services	build trust in the Hispanic community alongside other community partners and resources
5/9/24	VT MM & TT	Casa Hispana Group Ride	Distributed by email and at 2 Hispanic Interagency Meetings	Group Ride	Hands-on experience to build trust and relationships with referral sources

6/4/24	VT MM & TT	VIDA Group Ride with Spanish speaking mothers group	Distributed by VIDA to their mothers group	Group Ride	Vida serves a large Hispanic population and seeks to help families with barrier to transportation
Annually	VT MM & TT	Pillars Community Health and Wellness Fair	Email, flyers, word of mouth	Booth	Tabling event to reach unhoused individuals needing transportation
8/3/23	VT MM & TT	Hmong Health Event and Volleyball Tournament	Email, flyers, word of mouth	Booth	Tabling event to reach members of the Hmong community to bridge transportation needs
2/17-20, 2025	VT MM	Booth at Appleton Public Library	Monthly - Distribute transportation information	Booth	APL New Library Grand Opening & Community outreach
7/13/24	ECWRPC Staff	Appleton Downtown Farmer's Market	East Central & Stakeholder Groups Modification to bus service hours	Booth	MTP input
7/17/24	ECWRPC Staff	Greenville Farmer's Market	East Central & Stakeholder Groups	Booth	MTP input
8/7/24	ECWRPC Staff	Menasha National Night Out	East Central & Stakeholder Groups	Booth	MTP input
Monthly	VT Mang. Team	Fox Cities Transit Commission	Published on website 4 days prior to meeting	Meeting	2 nd or 4 th Tuesday
2023-present	VT MM & TT	World Relief/Hope & Help Together/Heads Up Fox Cities	Frequent and engaged partnership	Meetings, group rides, and Travel Training Partners	Refugee needs for Transportation, Group training, volunteer training, PITT Crew
2023 - present	VT MM & TT	<ul style="list-style-type: none"> • Leaven Fox Cities • St. Vincent DePaul • Partnership Community Health • Hope Clinic & Care Center 	Frequent and engaged partnerships	Experience/exposure to the bus	Key organizations serving minority populations and underserved communities and strong partners for VT
2023-present	VT MM & TT	Fox Valley Literacy Council ELL classes	Bi-Annually or as needed: Fox Valley Literacy Staff	Training/Presentation	Assisting minority populations with reading, communicating, translating, etc...
2023-present	VT MM & TT	Multicultural Coalition, Inc. Events and Walk-in Wednesdays	Vaccine Clinics, cultural competency training, cultural needs & access to resources	Table events, travel training, trip planning, VT resources & tools, How-to translate our website for LEP populations	formed to improve urgent/timely communications to diverse populations
2024-present	VT MM	Appleton Engaged Podcast	Hosted by City of Appleton Community, Culture, & Belonging Dept.	Back-up co-host	Bringing awareness to community resources builds collaborative partnerships
2023-present	VT MM & TT	Newcomer Summit	AASD/Hope & Help Together/United Way Fox Cities	Workshop	Community initiative to unite in serving refugees or minority resettlements within the Fox Cities
2023-present	VT MM & TT	Long Cheng Marketplace & Hmong Adult Day Care Center	Hmong Leaders	Hmong New Year Annual Event, Group Bus Ride to Thompson Center	Hmong Elder Transportation Solutions and introduction to the fixed route bus
2023	VT MM & TT	Harbor House	Case Workers & Outreach Specialists	Meeting/Presentation	Assist BIPOC, LGBTQ & Hmong

					women access transportation
2023 – present	VT MM & TT	Fox Valley Technical College	ELL Department/Professors	Presentation & group rides	Intro to how to use VT and a group ride to the transit center and back to class
2023-present	VT MM & TT	Fox Valley Technical College	Student Life and DEI Offices	Annual tabling at registration days. Welcome to Wisconsin presentation at Tech Village for International Students in campus housing	Promote that FVTC Student ID's ride free, travel training, VT Connector Service and MM
2023 - present	VT MM & TT	Even Start (AASD/FVTC Partnership)	ELL Teachers	Role-play and Presentation	Introduction to VT, promote TT and MM services. Since Mom's can't leave the school, we role-play.
2023-present	VT MM & TT	Lawrence University	Community, Culture & Engagement Department Dean of Student Life	Tabling Events	Raise awareness that LU Student ID's ride free, TT, PITT Crew and MM services.
2023-present	VT MM & TT	FVTC International Student Classroom	International Student Department	Presentation & group rides	Presented to classes of International Students at FVTC and rode the bus to transit center for a tour
1/21/23	VT MM	Chinese New Year Celebration	Fannie Xie	Invited by Fannie	Cultural event to celebrate Chinese New Year and unite members of the Chinese Community in the Fox Cities
4/27/24	VT MM & TT	Menasha Library	Dia del Nino (Day of the Child)	Booth	Family outreach to Hispanic families in partnership with the Menasha Library
2023 - present	VT MM & TT	AASD Newcomer Student Classes	Within existing classroom	Presentation & group rides	Classroom roll-playing and introduction to Valley Transit so students can learn to use the bus and their student ID's as a benefit to free transportation
Annually	VT MM & TT	Menasha High School Open House	To existing students	Presentation and group rides	Resource table to educate families and offer Valley Transit services to reduce/eliminate truancy
Annually	VT MM & TT	Menasha ELL Summer School Program	Within existing classroom/programming	Presentation & group rides	Classroom roll-playing and introduction to Valley Transit so students can learn to use the bus and their student ID's as a benefit to free transportation
2024	VT MM & TT	Hope & Help Together	Office Hours and Creation and training of Simple English Document	Resource Tabling during walk-in hours and collaboration to better serve newcomers and refugee populations	Walk-in hours tabling event and collaboration to create resources to better serve newcomer families
Annually	VT MM & TT	AASD Middle School Open Houses	To existing students	Booth	Frequent tabling events to reach students

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, Valley Transit 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.

Valley Transit'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

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

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 Valley Transit to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data²

Valley Transit did the following:

1. Inserted county LEP data in the Title VI plan.
2. Analyzed the LEP demographic data for Valley Transit's program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English. All data was provided by ECWRPC using the US Census Bureau website as the source.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less of

¹ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

² <https://www.census.gov/programs-surveys/acs>

the population to be served) Valley Transit must provide translation of vital documents in written format for the non-English users.

- ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public, Title VI Complaint Procedure, Title VI Complaint Form, and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) comes into contact with 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.

The summary below discusses the frequency with which Valley Transit staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. Valley Transit staff persons use all available resources to assist LEP persons.

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

The summary below discusses how Valley Transit's program and services impact the lives of persons within the community. Valley Transit 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 methods Valley Transit uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis*, Valley Transit addresses the following elements:

- A description of how language assistance services are provided by language
 - A description of how LEP persons are informed of the availability of language assistance service
 - A description of how the language assistance plan is monitored and updated
 - A description of how employees are trained to provide language assistance to LEP persons
- And, any additional information deemed necessary.*

Valley Transit – Summary of the Language Assistance Plan Components

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

The US Census Bureau – American Community Survey (2019-2023) reports there are numerous languages spoken in Calumet, Outagamie and Winnebago Counties. Some of these languages include Spanish, Indo-European languages, Asian and Pacific Islander languages, and other languages. After English, the second largest language group is Spanish followed by Asian and Pacific Islander languages.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the population 5 years and older. 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), Valley Transit must provide an appropriate level of assistance for qualifying LEP groups.

In Valley Transit’s Tri-County area (Calumet, Outagamie and Winnebago Counties), 3,750 persons (.95%) have identified themselves as Spanish speaking and “speaks English less than well”; 3,230 persons (.82%) have identified themselves as Asian & Pacific Islander (including Hmong) speaking and “speaks English less than well.”

The 5% threshold was not met for Spanish or Asian population groups in the Tri-County area. However, both groups have more than 1,000 individuals.

**This information sourced by ECWRPC from the U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates*

Factor 2 – Frequency

Valley Transit, with assistance from our service contractors, tracks the number of encounters with LEP persons and considers adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of Valley Transit’s programs and services.

Valley Transit’s log of LEP interactions and assistance provided to individuals is used to ensure resources are available to address needs. Over the last 3 years, bus drivers and frontline staff noted 57 interactions with LEP persons by providing support using Google Translate. Over 72% of these LEP interactions speak Spanish. The remaining interactions involve infrequent contact with Swahili, Kinyarwanda, Dari, Punjabi, Chinese, French, and Arabic. Many documented interactions are questions that riders have regarding the intermodal services (Amtrak and Lamers Connect) that use the transit center. Other inquiries include common questions about bus schedules, routes, and fares.

The mobility manager and travel training specialist logged 196 conversations using Language Line* for outreach and travel training. Language Line consists of inbound and outbound landline conversations as well as real-time interactions using the Language Line app on their company provided devices. Collectively, there were 253 encounters with LEP persons; an average of 7 encounters per month (1/1/2023-4/30/2025).

**Call volume sourced from paid invoices to Language Line Solutions.*

Factor 3 – Importance

Valley Transit understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. A network of community support and an accessible transportation system is a key link to connecting LEP persons to these essential services.

Valley Transit continually identifies the activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. Valley Transit will continue to work with the community coalitions and resources to deepen partnerships and determine how to overcome barriers to access.

Factor 4 – Resources and Costs

Even though Valley Transit does not have a separate budget for LEP outreach, Valley Transit works to implement low-cost methods to reach LEP persons. This includes interpretation services, translation of some written materials and outreach activities focused on reaching LEP persons.

Valley Transit conducts outreach activities by working with many ethnic organizations/coalitions through the Fox Cities as well as the City of Appleton's Special Assistant to the Mayor for Community, Culture and Belonging. In January 2023, Valley Transit expanded our service offerings to include Language Line Solutions which offers the portability of using an app to provides immediate access to a live interpreter for our mobility manager and travel trainer. In their roles, they have more frequent and intentional interactions with direct assistance to overcome barriers, communicate instructions during travel training, and enhance relationships and build trust.

The Valley Transit mobility manager and travel trainer positions represent a significant investment and provide direct support to any community member that needs transportation service. Both positions routinely participate with organizations that represent LEP persons and provide one-on-one travel training assistance to community members, including LEP persons. Our travel trainer is bilingual (Spanish) and since most of our LEP encounters are Spanish speaking individuals, Valley Transit can resolve each case quickly to provide the assistance needed. Infrequent encounters with various other languages are handled with interpretation services and supported by our travel trainer when bus or other Valley Transit service is needed.

Despite having a low frequency of LEP encounters, Valley Transit has created rack cards, VT Connector Rider "How-to" Summaries in Spanish, and added a Spanish voiceover on our "How to Ride the Bus" video to the myvalleytransit.com website. Since the website offers Google Translate as well as the accessibility widget for translating the website, a plain English document was created so languages, other than Spanish, have a tool to guide them with website navigation in their preferred language. Fox Valley Technical College, a major resource in the region for teaching English as a second language and regularly invites Valley Transit to present an overview of Valley Transit and offer group rides to their English Language Learner (ELL) classes several times a year.

We will continue to review this area to determine if a greater need exists that would warrant a different approach. If requests for translation of written materials increase significantly, Valley Transit will reconsider translation and printing of additional written documents.

We have found that participation in the network of organizations that work with LEP persons is a much better investment for limited resources. Our community has several programs and coalitions that work towards supporting LEP individuals.

For planning outreach, Valley Transit's MPO, East Central Wisconsin Regional Planning Commission (ECWRPC), will also continually assess this area to determine how they can support Valley Transit for transportation-related planning. ECWRPC has an additional focus on public outreach and inclusivity as it relates to regional transportation planning.

Description of how Language Assistance Services are Provided by Language
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- ✓ Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- ✓ When Valley Transit sponsors an event, staff greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Attendees at FCTC meetings are greeted to learn if support is needed.
- ✓ Vehicle operators, travel trainer, dispatchers and other front-line staff are provided opportunities to share their experience concerning any contacts with LEP persons to ensure resources are provided.
- ✓ Front-line staff that carry issued cell phones with the Google Translate App downloaded. This app allows users to enter text or use voice to translate between multiple languages. Service is also available on PCs at main office and downtown transit center. Drivers that need support radio for supervisor support at transit center or where appropriate.
- ✓ Travel Trainer position is bi-lingual (English & Spanish), which is an in-house resource for Spanish language assistance.
- ✓ Language Line Solutions are used by mobility manager, travel trainer and operations supervisors. Dispatch has been trained on how to use Language Line to receive in-bound calls.

Description of how LEP Persons are Informed of the Availability of Language Assistance Service
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Valley Transit does the following to inform LEP persons of the availability of language assistance services:

- ✓ Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Individualized travel training is provided with contracted interpretation services
- ✓ Partnering agencies with Valley Transit help inform their constituents of transit services and how to reach out to Valley Transit for more information
- ✓ The Valley Transit website uses the "Google Translate" translation service. This service allows users to translate any, or all, parts of the website into their native language. Additional accessibility is provided by accessiBe plug-in service.
- ✓ Utilize pictograms and other symbols on travel cards to assist LEP persons with bus route information.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <http://www.wisconsinrelay.com/spanish.html> and <http://www.wisconsinrelay.com/>
- ✓ ECWRPC conducts many ongoing events and outreach efforts that include the topic of public transportation in the Fox Cities region. ECWRPC specializes in gathering public input from all groups, including LEP persons. As ECWRPC encounters LEP persons, they connect them with the appropriate language assistance service and discuss lessons-learned in this area with Valley Transit.

Description of how the Language Assistance Plan is Monitored and Updated
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Valley Transit reviews its plan on an annual basis or more frequently as needed. Valley Transit will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivery of programs and services to ensure meaningful access to minority and LEP persons.

Valley Transit meets with contracted service providers on an annual basis to ensure the Title VI requirements are met on an annual basis to ensure the Title VI requirements are met. Valley Transit partners with East Central Wisconsin Regional Planning Commission (ECWRPC) to support applicable subrecipients in developing/updating a Title VI Program and compliance with requirements. WisDOT has provided subrecipients statewide with a Title VI Program template to help ensure all required elements are contained within the plan. To monitor compliance, Valley Transit meets with subrecipients quarterly, works with ECWRPC to schedule plan updates and forwards subrecipient Title VI information to the FTA, when requested. ECWRPC assists Valley Transit with the development of this plan and updates when needed.

Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Each year, Valley Transit will review the principles of Title VI and Valley Transit’s Language Assistance Plan with its employees. Valley Transit will ensure that our contracted service providers also educate their staff on Title VI requirements, and specifically LEP provisions.

The following training will be provided:

- ✓ Information on the Valley Transit Title VI Program and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Documentation of language assistance requests.
- ✓ How to handle a potential Title VI complaint.

If a driver, dispatcher or other team member needs further assistance related to LEP individuals, the Valley Transit management team will identify strategies to meet the language needs of the participants of the program or service.

Valley Transit has an open-door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with Valley Transit to ensure the individual receives access to the transportation service.

Valley Transit drivers and staff contact supervisor(s) on duty for assistance with LEP persons. If possible, the Google Translate App or Language Line is used. If further assistance is needed, the supervisor will contact our Mobility Manager or Travel Trainer positions to assist the LEP person with appropriate support.

As part of the annual site visit process, Valley Transit will discuss updates to the Language Assistance Plan with its subrecipients and contracted service providers.

Minority Representation Information

A. Minority Representation Table³

The table below depicts Valley Transit’s non-elected commissioners on the Fox Cities Transit Commission (FCTC). *Note: Percentages do not add up to 100%, because “Hispanic” is an ethnicity, not a race.*

County/Body	White Alone	Black or African American Alone	American Indian and Alaskan Native Alone	Asian, Native, Hawaiian and Other Pacific Islander Alone	Some Other Race Alone	Two or More Races	Hispanic	No Responses
Calumet County	89.2%	0.9%	0.3%	0.0%	0.3%	5.7%	5.6%	-
Outagamie County	86.6%	5.8%	1.1%	1.1%	1.7%	5.4%	5.1%	-
Winnebago County	87.8%	2.6%	0.4%	0.1%	1.2%	4.6%	4.9%	-
FCTC*	46.7%	0.0%	0.0%	6.7%	0.0%	0.0%	0.0%	46.7%

³ FCTC data was collected with a “Minority Representation Data Collection Form” and represents completed forms from commissioners that opted to self-identify.

B. Efforts to Encourage Minority Participation

Valley Transit understands that having representation of diverse populations on committees, councils and boards results in sound policy reflective of its entire population. As vacancies on boards, committees and councils become available, Valley Transit makes efforts to encourage and promote engagement and input from all backgrounds including race, color and national origin.

To encourage participation on its boards, committees and councils, Valley Transit will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, Valley Transit will use creative ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members, offering a web-based participation option (when possible) and providing transportation, if needed for its members.

Facility Location Equity Analysis

Valley Transit has no current or planned projects that require a facility location equity analysis.

Fixed Route Service Standards

Vehicle Load Standards

1. Expressed in writing

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 26-foot bus, 58 passengers for 35-foot buses, and 69 passengers for standard 40-foot buses.

2. Expressed in tabular format

Vehicle Type	Number in fleet	Average Passenger Capacities				
		Seated	Standing	Total	Wheelchair Capacity	Total Capacity With Wheelchairs
35' New Flyer	16	31	27	58	2	54
40' New Flyer	12	39	30	69	2	64

Vehicle Headway Standards

1. Expressed in writing

Vehicle Headway is the length of time it takes between two buses traveling in the same direction on a particular route. Valley Transit's buses are scheduled with either 30- or 60-minute headways.

2. *Expressed in tabular format*

ROUTE(S)	WEEKDAY PEAK SERVICE	WEEKDAY OFF-PEAK SERVICE	SATURDAY SERVICE
1, 2, 3, 4 & 5	60 Minutes	60 Minutes	60 Minutes
9	30 Minutes	30 Minutes	30 Minutes
12, 15, 20, 30 & 41	60 Minutes	60 Minutes	60 Minutes
6	N/A	60 Minutes	60 Minutes
8	60 Minutes	60 Minutes	N/A
11	60 Minutes	60 minutes	N/A
16	60 Minutes	60 Minutes	N/A
19	N/A	60 Minutes	60 Minutes
31	60 Minutes	60 Minutes	60 Minutes
32	60 Minutes	60 Minutes	60 Minutes

On-Time Performance Standards

One of the most important service standards is On-Time Performance or adherence to published schedules.

- A Valley Transit bus is considered on-time if it departs a scheduled time point no more than 1 minute early or more than 5 minutes late.
- Valley Transit's On-Time Performance objective is 90% or greater.

Valley Transit continuously monitors on-time performance and system results are published as part of a quarterly key performance indicators (KPI) report covering the reliability, quality and safety of operations. This KPI report is presented quarterly to staff and the transit commissioners.

Service Availability Standards

Valley Transit currently provides service to most major destinations and large employment centers within the communities that it serves. Valley Transit's 5-year Transit Development Plan (TDP) analyzes regional mobility and reassesses all service standards. The TDP reviews coverage of service by regional employment centers, population, households without a car, income and other community demographics that may indicate propensity to use public transit. Valley Transit reviews its level of service to each community during each TDP process and discusses expansion opportunities when additional resources become available. Route planning focuses on placing new service within ¼ mile from densely populated areas that have a high propensity for transit usage. Valley Transit optimizes the funding and resources that it receives from the partner communities to maximize its route coverage within these communities and transit-supportive areas.

Fixed Route Service Policy

Vehicle Assignment Policy

Valley Transit frequently reviews the ridership of its routes and assigns the larger and smaller capacity buses to the areas whose ridership best matches these capacity characteristics. Vehicles are assigned according to route capacity and rotated with the service group daily.

Transit Amenities Policy

Valley Transit has over 950 formal bus stop locations, many of which have been at the same location for more than forty years. In 2021, all stops were re-signed with more visible signage that included route number(s) that service the stop and contact info.

Valley Transit places bus stops every 2-3 blocks (approximately) and near major trip generators. 45 locations also include a bus shelter. Bus shelters are located throughout the service area. These shelters have also been in place for many years. As funding becomes available, old shelters are being replaced with new, accessible shelters.

Additional shelter locations can be requested by contacting Valley Transit. New installations are dependent on the ability to obtain the necessary right of way to locate the shelter and a sponsoring business or other entity to maintain and provide snow removal, if possible. Valley Transit utilizes passenger count data by location to prioritize locations with the highest usage. Valley Transit also reviews accessibility, socio-economic and minority population data prior to installing a new shelter.