

Title VI Plan

Valley Transit – Appleton, WI

Adopted on: **(DATE)**

Adopted by: Fox Cities Transit Commission

Minutes attached

Commented [DFV1]: VT will need a copy of board meeting minutes documenting approval of Program. Will provide for attachment, once plan is approved.

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.

Valley Transit will review its policy at least once a year to determine if modifications are necessary. As applicable, Valley Transit will meet with its third party contractor (transit provider) or lessee on an annual basis to ensure compliance with Title VI plan requirements.

Policy Updates – Activity Log

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

Title VI Notice to the Public

Valley Transit's Notice to the Public is as follows:

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

- ✓ Agency website www.myvalleytransit.com
- ✓ Public areas of Administrative Office
- ✓ Inside vehicles
- ✓ Rider Guide and Schedule
- ✓ Transit station

Title VI Complaint Procedure

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

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
 - ✓ Hard copy in the Administrative Office and Downtown Appleton Transit Center
-

Any person who believes she or he has been discriminated against on the basis of 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 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, the city 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, the city can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

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

Title VI Complaint Form

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

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the Administrative Office and Downtown Appleton Transit Center

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail 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 this question, 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 <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No

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, complaint and/or lawsuits filed against us during
 the report period.

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

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

Public Participation Plan

Process

The Fox Cities Transit Commission (FCTC) meets monthly, with all meetings open to the public. Time is provided for the public to comment on any issues at each meeting. Meetings are held during the operating hours of Valley Transit buses and paratransit vehicles to improve access for the public. Service and fare change notices are sent directly to persons and organizations that may be impacted. Persons and organizations can request notification of future meetings and there is no charge. 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. Each year, 30,000 route maps are printed and distributed throughout the community. Maps are available at several key destinations in the Fox Cities, on all transit vehicles, at the main office, and are mailed at no cost to requestors. Valley Transit also publishes brochures that describe specific programs and services. These materials are available to riders at the main office (801 S Whitman Ave), downtown transit center, website, and are distributed to local agencies.

Valley Transit's downtown transit center located at 100 Washington Street provides another communication avenue with riders. The transit center contains an informational window. Display boards at the downtown station contain travel information, notices to the public, contact information, and other communications applicable to the service. The transit center is centrally located in the service area and many routes pulse into the center for transfers between runs.

Each Valley Transit bus contains an info display area. Maps, brochures, flyers and notices are placed on buses for display to riders.

Valley Transit's website (www.myvalleytransit.com), Twitter page and Facebook page also provide information to the public. The web content includes information on trip planning, paratransit programs, contact info, board meeting agendas and minutes, detours, news, and more. Public input is welcomed via the website and visitors are provided several options for contacting Valley Transit (fax, mail, email, or phone). The website is designed to be clear and easy to use.

Valley Transit recently launch a rider app that shows real-time bus location, rider announcements and other information useful to riders or the general public.

Proposed fare and service changes are announced to the public by the means described above, and public input is solicited far enough in advance for Valley Transit to consider the comments, and make revisions based on the comments. In soliciting public input, Valley Transit provides opportunities for interaction.

Valley Transit's ongoing public participation outreach methods to engage minority and LEP populations include partnerships with community-based organizations, use of digital media and public participation techniques implemented during our transit development plan process.

Valley Transit has continuing partnerships with community-based organizations. We have provided travel training resources to World Relief, Lakeland Care District, the literacy council and Aging & Disabilities Resource Council. We have ongoing meetings and contact with these groups to invite participation and communicate transit issues. Valley Transit participates in community events that help us to engage minority and LEP populations. We attend annual Back to School Fairs that are designed to help families and children prepare for the upcoming school year. We also attend other public events that are designed to promote public participation and information sharing.

Valley Transit uses digital media as another avenue to engage participation. Our Facebook, Twitter and website pages all provide any member of the community the ability to contact us on their schedule. We post all information that is applicable to our riders (news, notices, and planning events) to help notify all populations. We realize that not all community members have access to the internet. However, a rider survey in 2014 showed that 45% of our riders have a smart phone and given the national trends for smart phone usage and access to the internet, it seems very likely that this percentage has increased since 2014.

Valley Transit's transit planning process (Transit Development Plan - TDP) contains its own Public Participation Plan. The PPP is developed by our 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 helps to disseminate information to populations that can be hard to reach. 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 most recent TDP steering committee was made up of organizations and advocacy groups that represented a variety of community interests. The participant list included county health and human services staff, Valley Packaging Inc., ESTHER (faith-based org), Wisconsin Department of Workforce Development, Making the Ride Happen (non-profit), Casa Hispana, Appleton School District, World Relief, Partnership Community Health Center (non-profit), Fox Valley Tech College, Fox Cities Chamber, United Way and Hmong American Partnership.

The TDP process occurs every 5 years. The results of the TDP drive Valley Transit 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.

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 as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ 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 inclusive public participation. On an annual basis, Valley Transit reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

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

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e. posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

Event Date	Valley Transit Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Notes
3/1/18	GM, AGM, Finance, Ops Spec & ECWRPC staff	TDP Mtg		Meeting	
4/5/18	""	TDP Mtg		Meeting	
5/3/18	""	TDP Mtg		Meeting	
6/6/18	SRF Consulting	TDP stakeholder outreach events		Targeted stakeholder meetings & pop-up style events	With Steering committee stakeholders, at Fox Valley Technical College and downtown Transit Center
6/7/18	GM, AGM, Finance, Ops Spec & ECWRPC staff	TDP Mtg		Meeting	
8/2/18	""	TDP Mtg		Meeting	
9/6/18	""	TDP Mtg		Meeting	
10/4/18	""	TDP Mtg		Meeting	
1/10/19	""	TDP Mtg		Meeting	
Ongoing Monthly	VT Mang. Team	FCTC Mtg	Published on website 4 days prior to meeting	Meeting	2 nd or 4 th Tuesday
Future dates (in 2019)	ECWRPC (as part of TDP update)	Attend farmer's markets (Appleton, Neenah, Kaukauna)	To be announced	Booth/space at farmer's market	
Future dates (in 2019)	ECWRPC (as part of TDP update)	Pop-up events at Appleton Public Library & Downtown Transit Center	To be announced	Pop-up style event	

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 a copy of Valley Transit's county LEP data in the Title VI plan. This data was found at the WisDOT website <http://www.dot.wisconsin.gov/localgov/docs/title6-lep.pdf> or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>
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.

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

² The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

- 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 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 are encouraged to use LEP resource materials 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 person's 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 low cost 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 (listed below as item #1)*, Valley Transit addresses the following elements:

- Item #2:* A description of how language assistance services are provided by language
- Item #3:* A description of how LEP persons are informed of the availability of language assistance service
- Item #4:* A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons
 And, any additional information deemed necessary.

Valley Transit – Summary of the Language Assistance Plan Components

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

Factor 1 – Demography

The US Census Bureau – American Fact Finder (2013-2017) 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 (i.e. Hmong).

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 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 translation of vital documents in written format for non-English speaking persons.

In Valley Transit’s tri-county area (Calumet, Outagamie and Winnebago Counties), 11,045 persons (3%) have identified themselves as Spanish speaking and “speaks English less than well”; 7,965 persons (2%) have identified themselves as Asian & Pacific Islander (Hmong) speaking and “speaks English less than well” Both language groups are below the 5% threshold of the population to be served. This means Valley Transit is not required to provide written translation of vital documents.

In the future, if Valley Transit meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Factor 2 – Frequency

Valley Transit will be trained on what to do when they encounter a person that speaks English less than well. Valley Transit with assistance from our transit provider/lessee will track the number of encounters and consider making 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.

Log of LEP 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
10/26/18	10:14 AM	Spanish	Pablo Torrez	Translation (VTII)	No	Communication Technician	
11/20/18	12:52 PM	Spanish	Pablo Torrez	Translation (VTII)	No	Communication Technician	

11/20/18	1:09 PM	Spanish	Pablo Torrez	Translation (VTII)	No	Communication Technician	

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. Google Translate App is used. If further assistance is needed, supervisor will contact local translation services/support available from World Relief, applicable police department and City of Appleton Diversity Coordinator.

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 transportation system is a key link to connecting LEP persons to these essential services.

Valley Transit is in the process of identifying 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 work with the Fox Valley Hispanic Interagency coalition and the Hmong-American Partnership to determine these items.

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.

Valley Transit conducts outreach activities by working with community ethnic organizations (Casa Hispana, Hmong-American Partnership, Refugee Resettlement Committee and World Relief) and works closely with the City of Appleton’s Diversity Coordinator who manages all contracts and communications as they relate to interpreter services. These outreach/resource awareness efforts are low cost methods and are accomplished by existing staff resources, the use of posting website information and printing brochures/materials.

Valley Transit works with a mobility manager, who is able to provide one-on-one travel training assistance to community members, including LEP persons. The mobility manager uses tools, like Google Translate App and flashcards for communication. The mobility manager also reaches out to local organizations, like World Relief, for added support and translation services.

Valley Transit had previously printed the rider’s guide in Spanish. Due to low demand/usage, this was discontinued several years ago. If safe harbor thresholds are met or exceeded, the rider’s guide and other vital documents will again be translated for applicable groups.

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

- ✓ *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, have a staff person 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 and other front-line staff, like dispatchers, and dial-a-ride schedulers, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.*
- ✓ *Front-line staff that carry issued cell phones download and utilize Google Translate App. This app allows users to enter text or use voice to translate between multiple languages. Service also available on PCs at main office and downtown transit center. Drivers that need support radio for supervisor support at transit center and along route.*

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

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.*
- ✓ *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.*
- ✓ *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 communicates any successes or challenges in this area with Valley Transit.*

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

Valley Transit reviews its plan on an annual basis or more frequently as needed. In particular, 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 delivering of programs and services to ensure meaningful access to minority and LEP persons.

In addition, Valley Transit will meet with our 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. The last round of annual contracted service provider site visits was completed in July and October of 2018.

ECWRPC assists Valley Transit with development of this plan and updates when needed.

Item # 5 - 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 Policy and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Documentation of language assistance requests.
- ✓ How to handle a potential Title VI/LEP 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.

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

Minority Representation Information

A. Minority Representation Table³

The table below depicts Valley Transit's non-elected commission related to transit.⁴

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Calumet County	95%	4%	0.9%	2.3%	0.6%	1.0%
Outagamie County	90%	4%	1.3%	3.4%	1.7%	1.7%
Winnebago County	92%	4%	2.1%	2.6%	0.6%	1.5%
Fox Cities Transit Commission	X%	X%	X%	X%	X%	X%

Commented [DE2]: In progress

B. Efforts to Encourage Minority Participation

Valley Transit understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, Valley Transit encourages participation of all its citizens.

As vacancies on boards, committees and councils become available, Valley Transit will make efforts to encourage and promote diversity.

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 create ways to make participating realistic and reasonable. Such as,

³ County data by race is available at the WisDOT website <http://www.dot.wisconsin.gov/localgov/transit/title6.htm> or the US Censure Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

⁴ American Community Survey (2013-2017), 5-year Estimates (Table DP05)

scheduling meetings at times best suited to its members and providing transportation, if needed for its members.

Minority Representation Data Collection Form

Name of board, commission, council, etc.

Date:

Dear Member,

As Valley Transit is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for Valley Transit to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of Valley Transit, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

Asian or Pacific Islander: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

Black and/or African American (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

Caucasian (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Facility Location Equity Analysis

Valley Transit has no current plans for facility construction or any recent facility construction projects.

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 32 & 35-foot buses, and 67-69 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
26' Arboc & Glaval	3	20	10	30	2	26
32' Orion VII	15	31	27	58	2	54
35' New Flyer	5	31	27	58	2	54
40' New Flyer	6	39	30	69	2	64
40' Orion VII	4	37	30	67	2	61

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. During peak service, all half hour routes, and some hour long routes run with 30 minute headways. During the off-peak times all routes run once per hour.

2. *Expressed in tabular format*

ROUTE(S)	WEEKDAY PEAK SERVICE	WEEKDAY OFF-PEAK SERVICE	SATURDAY SERVICE	SPECIAL NOTES
1, 2, 3, 4 & 5	30 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	Begins service at 5:50 p.m. M-F
8	30 Minutes	60 Minutes	N/A	Last route leaves at 4:50 p.m. M-F
11	60 Minutes	60 minutes	N/A	Last route leaves at 4:20 p.m. M-F
16	30 Minutes	60 Minutes	N/A	Last route leaves at 4:50 p.m. M-F
19	N/A	60 Minutes	60 Minutes	Begins service at 5:20 p.m. M-F
31	60 Minutes	60 Minutes	60 Minutes	Last route leaves at 5:20 p.m. M-F
32	60 Minutes	60 Minutes	60 Minutes	Last route leaves at 5:50 p.m. M-F

On-Time Performance Standards

One of the most important of Valley Transit's service standards is its 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 quarterly performance reports covering all aspects of operations.

Service Availability Standards

Valley Transit currently provides service to all major destinations and large employment centers within the communities that it serves. Valley Transit's 5-year Transit Development Plan (TDP) addresses region mobility and reassesses all service standards. The TDP analyzes coverage of routes by regional employment centers, population, households without a car, and income. 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 considers 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. After capacity of a route is known, vehicles meeting or exceeding that capacity are rotated each day of service

Transit Amenities Policy

Valley Transit has nearly 1,000 bus stops, many of which have been in place for more than forty years. In 2013, all stops were re-signed with more visible signage that also includes the route number(s) that service the stop. Additionally, each sign has its ID number listed on it for use with Valley Transit's real-time bus arrival data system. Valley Transit places bus stops every 2-3 blocks (approximately) and near major trip generators.

Valley Transit also has 45 bus shelters located throughout the service area. Most of these shelters have also been in place for many years. As funding becomes available, old shelters are being replaced with new, accessible shelters.

New 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 provide snow removal, if possible. Valley Transit utilizes passenger count data by location to prioritize locations with highest usage.