
LIMITED ENGLISH PROFICIENCY PLAN

La Crosse Municipal
Transit Utility

Adopted by LMTU Board

January 30, 2018

Revised January 20, 2018

LIMITED ENGLISH PROFICIENCY PLAN

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Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the La Crosse Municipal Transit Utility (LMTU) and governments, private and non-profit entities, and sub recipients.

Plan Summary

The LMTU has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to LMTU services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the LMTU's extent of obligation to provide LEP services, the LMTU undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number of or proportion of LEP persons eligible in the LMTU service area who maybe

served or likely to encounter an LMTU program, activity, or service; 2) the frequency with which LEP individuals come in contact with an LMTU service; 3) the nature and importance of the program, activity or service provided by the LMTU to the LEP population; and 4) the resources available to the LMTU and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analyses

- 1. The number or proportion of LEP persons eligible in the LMTU service area who maybe served or likely to encounter an LMTU program, activity, or service.**

The LMTU examined the US Census report from 2010 and was able to determine that approximately 6%, or 10,300 people within LMTU's service area age 5 and older spoke a language other than English. Of the 6,896 people reporting they speak other languages than English, 3,512, less than 2% of the total respondents speak English less than very well.

The LMTU further analyzed our actual experience and contact with LEP persons by reviewing contacts with transit vehicle operators and customer service personnel. It was determined that the contact with LEP persons by these individuals was very low.

- 2. The frequency with which LEP individuals come in contact with an LMTU program, activity, or service.**

The LMTU assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. Since June of 2005, the LMTU has had no requests for interpreters and zero requests for translated LMTU documents. The staff and drivers have very little contact with LEP individuals. The primary contacts are international students attending school at the University of Wisconsin La Crosse or Viterbo University. Our experience with this population has shown that they tend to know enough English to communicate on the phone and with drivers. The other primary contacts are with Hmong speaking individuals, but many of those individuals also speak English.

- 3. The nature and importance of the program, activity, or service provided by LMTU to LEP community.**

The largest geographic concentration of any one type of LEP individuals in the LMTU service area is Hmong speaking individuals. The overwhelming majority of the population, 99% or 99,676 are able to speak English.

The University of Wisconsin La Crosse offers a number of social, service, and professional organizations.

- Multicultural Student Service - The primary goals of the Office of Multicultural Student Services (OMSS) at the University of Wisconsin-La Crosse are to increase the undergraduate

and graduate enrollments of U.S. underrepresented and disadvantaged students, to improve the quality of their educational and social experiences and to increase the number of graduates. To accomplish these objectives, OMSS is involved in specific recruitment and retention activities, and special academic support programs. OMSS also sponsors numerous cultural events, supports ethnic student organizations and services, promotes community outreach efforts, consults and holds joint programming sessions with other support services offices and encourages staff and faculty involvement in underrepresented student assistance programs.

- Multicultural Faculty and Staff Organization (MUFASO) serve as a professional and communal resource for multicultural faculty and staff at UW-L.

The La Crosse Area Hmong Mutual Assistance Association (LAHMAA)

- The LAHMAA strives to actively assist Southeast Asian families to become socially and economically self-sufficient by: accessing educational opportunities, teaching job skills, strengthening family relationships, and promoting and preserving traditional customs.

With the exception of the above organizations, there is a lack of any other social, service, professional and leadership organizations within the LMTU service area that focuses on outreach or membership of LEP individuals.

Services provided by LMTU that are most likely to encounter LEP individuals are the fixed route bus system which serves the general public and the demand response (MTU Mobility Plus) system which serves primarily disabled persons. It is also likely that LMTU will encounter LEP individuals at the downtown Grand River Station where passes are sold, community outreach events and posters are displayed relating to transit events.

4. The resources available to the LMTU and overall costs.

The LMTU assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on an as needed basis, which documents would be the most valuable to be translated if and when the populations supports it, taking an inventory of available organizations that the LMTU could partner with for outreach and translation efforts, and what level of staff training is needed.

After analyzing the four factors, the LMTU developed the plan outlines in the following section for assisting persons of limited English proficiency.

LIMITED ENGLISH PROFICENCY PLAN OUTLINE

How to identify an LEP Person who Needs Language Assistance

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past Board meetings and public hearings to anticipate the possible need for assistance at upcoming meetings;
- When LMTU sponsored public information meetings or hearings are held, set up a sign-in sheet table, have staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I speak Cards" at the public hearing sign in table. While staff may not be able to provide translation assistance at the meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the LMTU Transit Center Customer Service area; and
- Survey drivers and other front line staff on an annual basis regarding their experience on having any direct or indirect contact with LEP individuals.

Language Assistance Measures

The LMTU has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the LMTU services area:

- Census Bureau's "I Speak Cards" are to be located at the Customer Service window in the Transit Center at all times.
- The computer located at the Customer Service window in the Transit Center will have Google Translate added to the favorites listing for easy access via Microsoft Internet Explorer for translation of blocks of texts, such as timetable or Rider Guide information. This will aid the LMTU staff in the interpretation of services on a one on one basis for LEP individuals visiting the LMTU Transit Center.
- The LMTU web site includes a Spanish translated version of the Rider Guide and will include a link to Google Translate in a future update.
- The LMTU will try to utilize our own Hmong speaking staff (currently two drivers and 1 service person) in certain situations to assist with interpreter needs. The La Crosse Police Department and Gundersen Lutheran Medical Center are also sources of assistance in this regard.

- When an interpreter is needed, in person or on the telephone, and the LMTU staff has exhausted the above options, staff will first attempt to determine what language is required. Staff shall use the telephone interpreter service – Language Line Services at <http://www.language.com>. On the Language Line home page the staff will select the Need an Interpreter Now Link and follow the directions to receive an access code.

LMTU Staff Training

All LMTU staff will be provided with a copy of the LEP Plan and will be educated on procedures to follow. This information will also be part of the LMTU staff orientation and training process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the LMTU offers;
- Use of LEP “I Speak Cards”;
- How to access Google Translate and Alta Vista Babel Fish via the Customer Service computer in the LMTU Transit Center;
- How to access translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

Outreach Techniques

As of this first draft of the LMTU LEP Plan dated April 2011, LMTU has an informal practice of outreach techniques due to the low number of LEP populations and resources available in the service area. However, the following are a few examples of what LMTU has incorporated into our services to LEP individuals:

- Staff attended a Hmong Culture In-Service Training on September 25, 2007. This training was conducted by the La Crosse Area Hmong Mutual Assistance Association for all City of La Crosse Departments. Refresher training to be conducted in 2015.
- LMTU staff has provided In-Service training in cooperation with staff from the La Crosse Workforce Connections Office to provide education to Hmong individuals on how to ride the bus. We have conducted three training sessions to date.
- The La Crosse Workforce Connections staff has provided translation service for some documents and policy postings.
- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with

known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternate language, based on known LEP population in the area.

- Key print materials, including schedules and policies, will be translated and made available at the LMTU Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.
- The La Crosse Area Hmong Mutual Assistance Association and Office of International Education were contacted for input on adding Hmong and Chinese languages to La Crosse MTU website for translation.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the LMTU will follow the Title VI Program update schedule for the LEP Plan. The next required Title VI Program update must be forwarded to FTA by May 1, 2015. The update will then include information from the 2010 Census if available.

Each update should examine all plan components such as:

- How many LEP persons were encountered?;
- Were their needs met?;
- What is the current LEP population in the LMTU service area?;
- Has there been a change in the types of languages where translation services are needed?;
- Is there still a need for continued language assistance for previously identified LMTU programs? Are there other programs that should be included?;
- Have the LMTU's available resources, such as technology, staff, and financial costs changed?;
- Has LMTU fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

Dissemination of LMTU Limited English Proficiency Plan

The LMTU includes the LEP plan on the LMTU website (www.cityoflacrosse.org/mtu) together with its Title VI Policy and Complaint Procedures. The LMTU Notice of Title VI Rights is to be posted at the LMTU Transit Center and on all LMTU buses.

Any person, including social service agencies, non-profits, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP person may obtain copies/translated upon request.

Any questions or comments regarding this plan should be directed to the LMTU Transit Manager at:

Transit Manager
La Crosse MTU
2000 Marco Drive
La Crosse, WI 54601
Phone: 608-789-7350
Fax: 608-789-7374

Title VI complaints to the City of La Crosse Title VI Coordinator:

Transit Operations Manager
La Crosse MTU
2000 Marco Drive
La Crosse, WI 54601
Phone: 608-789-7350
Fax: 608-789-7374

APPENDIX A

U.S. Census Bureau American Fact Finder Data

La Crosse County, WI

Total Population -(2010 Census)

114,638

(2016 Population estimate as of 7/1/2016)

118,122

age	Language	Speak other than english	Speak english very well	Speak english less than very well
5-17	Spanish	486	166	320
	Indo-European	222	199	23
	Asian/Pacific	943	415	528
	other	113	113	0
18-64	Spanish	1881	1037	844
	Indo-European	958	670	288
	Asian/Pacific	2667	1453	1214
	other	178	115	63
65-up	Spanish	61	36	25
	Indo-European	305	222	83
	Asian/Pacific	65	0	65
	other	10	10	0
Total	7889	4436	3453	
Percent of Population	6.68%			
Total of "Speak less than Well"		3453		
Percent of Total -		2.92%		

Results from American Fact Finder S1601 (LANGUAGE SPOKEN AT HOME)
2012-2016 American Community Survey 5-Year Estimates

U.S. Census Bureau American Fact Finder Data

Houston County, MN

Total Population -(2010 Census)

19,027

(2016 Population estimate as of 7/1/2016)

18,814

age	Language	Speak other than english	Speak english very well	Speak english less than very well
5-17	Spanish	18	18	0
	Indo-European	47	47	0
	Asian/Pacific	12	10	2
	other	0	0	0
18-64	Spanish	79	41	38
	Indo-European	98	91	7
	Asian/Pacific	23	13	10
	other	10	10	0
65-up	Spanish	5	5	0
	Indo-European	47	44	3
	Asian/Pacific	5	5	0
	other	0	0	0
Total		344	284	60
Percent of Population		1.83%		

Total of "Speak less than Well"

60

Percent of Total -

0.32%

Results from American Fact Finder S1601 (LANGUAGE SPOKEN AT HOME)
2012-2016 American Community Survey 5-Year Estimates

U.S. Census Bureau American Fact Finder Data

Winona County, MN

Total Population -(2010 Census)

51,461

(2016 Population estimate as of 7/1/2016)

50,948

age	Language	Speak other than english	Speak english very well	Speak english less than very well
5-17	Spanish	368	309	59

Indo-European	221	194	27
Asian/Pacific	132	56	76
other	36	6	30
18-64			
Spanish	806	551	255
Indo-European	681	610	71
Asian/Pacific	652	490	162
other	122	93	29
65-up			
Spanish	46	17	29
Indo-European	121	99	22
Asian/Pacific	65	15	50
other	3	3	0
Total	3253	2443	810
Percent of Population	6.38%		

Total of "Speak less than Well"

Percent of Total -

810
1.59%

Results from American Fact Finder S1601 (LANGUAGE SPOKEN AT HOME)
2012-2016 American Community Survey 5-Year Estimates

Total Population for La Crosse County, WI/Houston County, MN/Winona County, MN

187,884
11486
6%

Total Population for La Crosse County, WI/Houston County, MN/Winona County, MN

187,884
4323
2%

Total Population speak english less than very well for the above 3 counties

Percent of Total for speak english less than very well

B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Universe: Population 5 years and over
2011-2015 American Community Survey 5-Year Estimates

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Versions of this table are available for the following years:
 2015
 2014
 2013
 2012
 2011
 2010
 2009

		La Crosse County, Wisconsin	
		Estimate	Margin of Error
1 of 119	Total:	110,490	+/-74
	Speak only English	102,695	+/-530
	Spanish or Spanish Creole:	2,283	+/-381
	Speak English "very well"	1,100	+/-227
	Speak English less than "very well"	1,183	+/-303
	French (incl. Patois, Cajun):	310	+/-142
	Speak English "very well"	243	+/-126
	Speak English less than "very well"	67	+/-54
	French Creole:	11	+/-15
	Speak English "very well"	11	+/-15
	Speak English less than "very well"	0	+/-20
	Italian:	49	+/-38
	Speak English "very well"	49	+/-38
	Speak English less than "very well"	0	+/-20
	Portuguese or Portuguese Creole:	0	+/-20
	Speak English "very well"	0	+/-20
	Speak English less than "very well"	0	+/-20
	German:	681	+/-187
	Speak English "very well"	486	+/-158
	Speak English less than "very well"	195	+/-93
	Yiddish:	10	+/-16
	Speak English "very well"	10	+/-16
	Speak English less than "very well"	0	+/-20
	Other West Germanic languages:	7	+/-10
	Speak English "very well"	7	+/-10
	Speak English less than "very well"	0	+/-20
Scandinavian languages:	54	+/-36	
Speak English "very well"	42	+/-29	
Speak English less than "very well"	12	+/-21	
Greek:	11	+/-17	
Speak English "very well"	11	+/-17	
Speak English less than "very well"	0	+/-20	
Russian:	122	+/-102	

	La Crosse County, Wisconsin	
	Estimate	Margin of Error
Speak English "very well"	122	+/-102
Speak English less than "very well"	0	+/-20
Polish:	9	+/-14
Speak English "very well"	9	+/-14
Speak English less than "very well"	0	+/-20
Serbo-Croatian:	2	+/-4
Speak English "very well"	2	+/-4
Speak English less than "very well"	0	+/-20
Other Slavic languages:	13	+/-14
Speak English "very well"	13	+/-14
Speak English less than "very well"	0	+/-20
Armenian:	5	+/-11
Speak English "very well"	5	+/-11
Speak English less than "very well"	0	+/-20
Persian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Gujarati:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Hindi:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Urdu:	47	+/-59
Speak English "very well"	41	+/-58
Speak English less than "very well"	6	+/-12
Other Indic languages:	37	+/-40
Speak English "very well"	37	+/-40
Speak English less than "very well"	0	+/-20
Other Indo-European languages:	5	+/-8
Speak English "very well"	5	+/-8
Speak English less than "very well"	0	+/-20
Chinese:	243	+/-128
Speak English "very well"	117	+/-77
Speak English less than "very well"	126	+/-96
Japanese:	26	+/-37
Speak English "very well"	26	+/-37
Speak English less than "very well"	0	+/-20
Korean:	83	+/-94
Speak English "very well"	23	+/-23
Speak English less than "very well"	60	+/-86
Mon-Khmer, Cambodian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Hmong:	3,327	+/-381
Speak English "very well"	1,832	+/-346
Speak English less than "very well"	1,495	+/-363
Thai:	11	+/-14
Speak English "very well"	9	+/-14
Speak English less than "very well"	2	+/-5
Laotian:	8	+/-13
Speak English "very well"	8	+/-13

	La Crosse County, Wisconsin	
	Estimate	Margin of Error
Speak English less than "very well"	0	+/-20
Vietnamese:	63	+/-56
Speak English "very well"	40	+/-36
Speak English less than "very well"	23	+/-29
Other Asian languages:	112	+/-107
Speak English "very well"	112	+/-107
Speak English less than "very well"	0	+/-20
Tagalog:	18	+/-21
Speak English "very well"	18	+/-21
Speak English less than "very well"	0	+/-20
Other Pacific Island languages:	28	+/-31
Speak English "very well"	28	+/-31
Speak English less than "very well"	0	+/-20
Navajo:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Other Native North American languages:	92	+/-100
Speak English "very well"	87	+/-99
Speak English less than "very well"	5	+/-9
Hungarian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Arabic:	92	+/-76
Speak English "very well"	59	+/-58
Speak English less than "very well"	33	+/-41
Hebrew:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
African languages:	36	+/-37
Speak English "very well"	36	+/-37
Speak English less than "very well"	0	+/-20
Other and unspecified languages:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Explanation of Symbols:

An '***' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.

An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.

An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.

An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.

An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.

An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.

An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.

An '(X)' means that the estimate is not applicable or not available.

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see *Accuracy of the Data*). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: *Language User Note*.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Title VI Policy

La Crosse Municipal Transit Utility (LMTU) assures that no person shall on the grounds of race, color or national origin as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any LMTU sponsored program or activity. LMTU further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Title VI compliance is a condition of receipt of Federal funds, LMTU's General Manager and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulation (CFR) 200 and 40 CFR 21.

James Krueger Jr.

LMTU Interim General Manager

Date: 1/30/18 Revised 1/20/18

Making a Title VI Complaint

Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color, or national origin, may file a complaint with the La Crosse Municipal Transit Utility. Such complaint must be filed in writing with the La Crosse MTU no later than 180 days after the alleged discrimination. For information on how to file a complaint, contact La Crosse MTU as listed below:

Title VI Coordinator

La Crosse Municipal Transit Utility

2000 Marco Drive

La Crosse, WI 54601

608-789-7350

La Crosse Municipal Transit Utility Title VI Plan

I. Policy Statement, Authorities and Citations

A. Policy of Nondiscrimination

La Crosse Municipal Transit Utility (LMTU) assures that no person shall on the grounds of race, color or national origin as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any LMTU sponsored program or activity. LMTU further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Title VI compliance is a condition of receipt of Federal funds, LMTU's General Manager and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulation (CFR) 200 and 40 CFR 21.

LMTU General Manager

Date

LMTU Board President

Date

B. Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are Federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

LMTU General Manager

LMTU's General Manager is authorized to ensure compliance with provisions of the LMTU's policy of nondiscrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. The LMTU's grants compliance function and Title VI coordination shall be performed under the authority of the LMTU General Manager.

Title VI Coordinator

LMTU's Operations Manager will perform the duties of the Title VI Coordinator and ensure implementation of the LMTU's Title VI Federally Funded Transportation Program. The Operations Manager has other duties and responsibilities in addition to Title VI. This position shall have a direct reporting relationship and access to LMTU's General Manager.

II. Title VI Plan Implementation and Program Administration

As authorized by LMTU's General Manager, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring LMTU's compliance with Title VI requirements as follows:

- A. **Program Administration.** Administer the Title VI program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing and resources; provide recommendations as required to the LMTU General Manager.
- B. **Complaints.** Review written Title VI complaints that may be received by the LMTU following the adopted procedural guidelines (see Section III-Complaint Procedures). Ensure every effort is made to resolve complaints informally at the local or regional level.
- C. **Training Programs.** Conduct or facilitate training programs on Title VI issues and regulations for LMTU employees; and facilitate Title VI training for appropriate staff and contractors. A summary of training conducted will be reported in the annual update.
- D. **Title VI Plan Update.** Review and update LMTU's Title VI Plan as needed or required. Present updated plan to the LMTU General Manager for approval.
- E. **Public Dissemination.** Work with LMTU staff to develop and disseminate Title VI program information to LMTU employees, contractors, subcontractors, consultants, and sub-consultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements on buses and at the transit center, inclusion of Title VI Policy Statement in newspaper(s) having a general circulation, and information on the LMTU web site. Ensure public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected

community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in languages other than English.

- F. Elimination of Discrimination. Work with the Human Resources Department, and other LMTU and City of La Crosse departments to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and elimination discrimination that may be discovered in any LMTU processes.

III. Complaint Procedures – Allegations of Discrimination in Federally Assisted Programs or Activities

A. Overview

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by LMTU, as well as to sub-recipients, consultants, and contractors. Law prohibits intimidation or retaliation of any kind.

The procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complains alleging discrimination. Every effort will be made to resolve complaints informally at the LMTU level.

B. Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by non discrimination requirements may file a complaint. A formal complaint must be filled within 180 calendar days of the alleged occurrence.
2. Upon receiving the written complain, LMTU will determine its jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint. In some situations, the LMTU may request the City of La Crosse Human Resources Department, or an independent, outside agency conduct the investigation.
3. Once LMTU decides its course of action, the complainant and the respondent will be notified in writing of such determination with five (5) calendar days. The complaint will be logged into the records of the Title VI Coordinator, and the basis for the allegation identified including race, color, national origin, handicap/disability or age.
4. In cases where LMTU assumes investigation of the complaint, LMTU will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days upon receipt, to furnish LMTU with his/her response to the allegations.

5. Within 60 days of receipt of the complaint, the Coordinator will prepare a written investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
6. The recommendation shall be reviewed with the City Attorney's office. The City Attorney may discuss the report and recommendations with the Coordinator and other appropriate LMTU and City of La Crosse staff. The report will be modified as needed and made final for its release to the parties.
7. Once the investigative report becomes final, briefings will be scheduled with each party within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.
8. If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s) he or she shall be advised of their rights to appeal LMTU's decision to WISDOT, U.S. Department of Transportation or U.S. Department of Justice. The complainant has 180 calendar days after the appropriate LMTU's final resolution to appeal to USDOT. The complainant may file a separate Title VI complaint directly with the FTA.
9. An annual Log of Complaints will be maintained by LMTU. The Log of Complaints will contain the following information for each complaint filed:
 - The name and address of the person filing the complaint
 - The date of the complaint
 - The basis of the complaint
 - The disposition of the complaint

IV. Title VI Implementation Activities in Planning Activities

Planning Activities

1. Public Involvement in Planning Activities & Title VI
 - a) Invite participation of a cross section of the populace from social, economic, and ethnic groups in the planning process by disseminating written program information to minority media and ethnic organizations, and providing public service announcements for all local media, when forming citizen advisory committees or planning board, and requesting involvement.
 - b) LMTU staff will obtain demographic statistics at applicable community meetings and public hearings involving transportation planning sessions. Data will be gathered through use of a

voluntary self-reporting form which includes race, gender, and national origin. Copies of the completed forms will be provided to Title VI Coordinator after each meeting.

- c) To ensure access to public meetings, evening meetings will be conducted in a variety of community buildings through the LMTU service area, including those along transit routes, ensure translation services are available if anticipated, and ensure public meetings are held in predominantly minority communities when transportation projects will specifically impact those communities.

La Crosse Municipal Transit Utility

Title VI Complaint Form

This form is designed to assist you in filing a Title VI complaint with the La Crosse Municipal Transit Utility (LMTU). You are not required to use this form. Your complaint may be filed in any manner, such as a letter, that contains the same information. However, for LMTU to perform a complete investigation, it is important to include all of the information that this form asks for.

Section I:

Name: _____

Address: _____

Home Telephone: _____ Cell or Alternate Telephone _____

Section II:

Are you filing this complaint on your own behalf? Yes No

If you answered "Yes", go to Section III.

Name of person discriminated against if other than yourself:

Please explain why you are filing for a third party: _____

Please confirm that you have obtained permission to file on this person's behalf: Yes No

Section III.

Have you filed this complaint with any other agency: Yes No

If you answered "Yes" please provide the following:

Name of agency: _____

Address: _____

Contact Person: _____

Telephone Number: _____

Section IV:

Program that you feel discriminated against you: _____

Do you know the name of the individual?: _____

If not, could you please describe the individual?: _____

Please provide the following information regarding the incident:

Date: _____ Time: _____ Bus Route/Number: _____

Location: _____

Section V:

What type of harm or discriminatory action was taken against you?

- Service
- Accommodation
- Hostile Environment
- Other

If "Other", please specify:

Section VI:

Please provide a detailed description of the incident:

Section VII:

Were there any other witnesses to this incident? Yes No

Name: _____

Address: _____

Telephone: _____

Section VIII:

Is there any other information that you would like to provide to assist us in our investigation of this incident:

Section IX:

What remedy would you like LMTU to consider?

Signature

Date

Note: Complaint will not be accepted without a signature.

LMTU's Title VI Officer will investigate all complaints. At the conclusion of our investigation we will send a letter of finding to the complainant. If our investigation determines that we were not in violation of Title VI, our letter will explain why we were in compliance. If it is determined that there was a violation of Title VI, our letter will document the violation and the action that LMTU 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 LMTU or the Federal Transit Administration.

Any questions or comments regarding this plan should be directed to the LMTU Operations Manager at:

Title VI complaints to the City of La Crosse Title VI Coordinator:

Transit Operations Manager
La Crosse MTU
2000 Marco Drive
La Crosse, WI 54601
Phone: 608-789-7350
Fax: 608-789-7374



La Crosse MTU
2000 Marco Drive
La Crosse, WI 54601
(608) 789-7350
(608) 789-7374 FAX

Service Standards And Policies

Planning, Development & Transportation (PDT) Mission Statement:

The success of the PDT is built on the skills and effort of a talented, dedicated and professional work force. MTU employees have a long history of providing quality, friendly and professional public transportation in La Crosse. Through our combined efforts we can continue to provide the best service possible to all of the communities we serve.

La Crosse Municipal Transit Utility (MTU) Mission Statement:

At MTU, it is our mission to provide low-cost, quality transportation that meets the needs of the La Crosse area. We will strive to provide affordable and accessible transportation that helps to ensure equality of opportunity, independent living, and economic self-sufficiency for those who rely on our assistance. Public transportation that is safe, reliable, and convenient benefits our riders, our environment, and our community. At MTU, we're helping all kinds of people achieve a better way of life.

La Crosse MTU Vision:

We are the first choice for transportation in the La Crosse area.

La Crosse MTU Goals:

To make a real difference by providing personalized, responsive and 'extra mile service' that stands out in a unique way that our customers will appreciate and remember.

1. Vehicle Load

1.1 Maximum Load Standard

The average of all loads during peak operating period should not exceed vehicles achievable capacities. The maximum load capacity is the number of seated passengers plus 50%.

Vehicle Types	Average Passenger Capacities				<u>Maximum Load Factor</u>
	<u>Seated</u>	<u>Standing</u>	<u>Total</u>		
28' Standard Bus	102	27	13	40	1.5
27' Low Floor Bus	103	21	10	31	1.5
35' Low Floor Bus	1100's	32	16	48	1.5
35' Low Floor Bus	1200's	32	16	48	1.5
35' Low Floor Bus	1300's	32	16	48	1.5

2. Vehicle Headway Standards

Service operates on fixed routes.

Route 1 South Avenue, Route 2 Green Bay, Route 4 Losey Boulevard, Route 5 Valley View Mall, and route 6 Northside operate every 30 minutes beginning at 5:10am and ending at 5:40pm, and every 60 minutes from 5:40pm and ending at 10:40pm.

Saturday Service is hourly starting at 7:40am and ending at 7:40pm.

Sunday Service is hourly starting at 7:40am and ending at 6:40pm.

Route 7 French Island operates Monday through Friday with 60 minute service starting at 5:55am and ending at 5:55pm. With the exception of the last 60 minutes when there is 30 minute service.

Route 8 Crossing Meadows operates Monday through Friday with 60 minute service beginning at 6:25am and ending at 4:55pm.

Route 9 Onalaska operates Monday through Friday with 60 minute service beginning at 7:25am and ending at 10:25am and again at 1:25am and ending at 6:25pm with the exception of the first trip which is 30 minutes and runs to Center 90 and back.

Route 10 La Crescent operates Monday through Friday with 60 minute service from 5:40am until 12:30pm and 1:10pm until 7:00pm. Saturday with hourly service from 7:40am until 3:30pm.

Scheduling involves the consideration of factors including: ridership, productivity, and transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to major transportation developments, land use connectivity, and transportation demand management.

Weekdays	Day	Night
Routes		
1 South Avenue	30	60
2 Green Bay	30	60
4 Losey Boulevard	30	60
5 Valley View Mall	30	60
6 Northside	30	60
7 French Island	60	0
8 Crossing Meadows	60	0
Day hours are 5:10am-5:40pm		
Night hours are 5:40pm-10:40pm		
	Morning	Afternoon
9 Onalaska	60	60
Morning hours are 7:25am-10:25am		
Afternoon hours are 1:25pm-6:25pm		
	Morning	Afternoon
10 La Crescent	60	60
Morning hours are 5:40am-12:40pm		
Afternoon hours are 1:10pm-7:00pm		

Saturday	Day
Routes	
1 South Avenue	60
2 Green Bay	60
4 Losey Boulevard	60
5 Valley View Mall	60
6 Northside	60
Day hours are 7:40am-7:40pm	
10 La Crescent	
Day hours are 7:40am-3:30pm	
Sunday	Day
Routes	
1 South Avenue	60
2 Green Bay	60
4 Losey Boulevard	60
5 Valley View Mall	60
6 Northside	60
Day hours are 7:40am-6:40pm	

3. Service Availability

Design Standards

A transit operator receives many requests for service from passengers who are not within walking distance of any route, or desire to have buses operate in their neighborhood, or to serve different locations not on any route. Since transit resources are limited. It is unlikely that everyone will be accommodated to a satisfactory degree. Therefore, it is necessary to determine how to allocate the available resources to provide the best possible service. The City of La Crosse MTU will distribute service so that 90 % of all residents in the service area are within a ¼ mile walk of bus service.

AND/OR

Local bus stops will not be more than 3 blocks apart on average.

4. Vehicle Assignment

All of the City of La Crosse MTU vehicles are equipped with air conditioning. All La Crosse MTU buses are randomly assigned to all routes, except Bus 102. Bus 102 is available to meet the service needs based on capacity of any of the following routes. Route 10 La Crescent, Route 9 Onalaska, and Routes 7/8 French Island and Crossing Meadows. Bus 103 will be used on Route 10 La Crescent.

5. On Time Performance

Ninety two (92) percent of City of La Crosse MTU buses will complete their established runs no more than 3 minutes late in comparison to the established scheduled/published time tables.

6. Distribution of Transit Amenities

La Crosse MTU maintains service standards for distribution of various transit amenities, including: bus shelters, benches and route schedules.

Bus Shelters and benches will be placed along bus routes based on the number of passengers boarding at stops along the route.

7. Transit Security

La Crosse MTU will provide transit security measures to protect employees and the public against any act or threat of violence or personal harm.

- Participation in The Transit Watch public awareness outreach campaign
- Each transit vehicle will be equipped with on-board surveillance cameras
- The Transit Center will be equipped with surveillance cameras
- Each Transit vehicle will be equipped with an discreet emergency notification button
- The Transit Center will have security personnel afternoon and evenings and on weekends
- Policies regarding review of surveillance video ensure that surveillance is conducted without regard to race, color, or national origin

Signature

Date

La Crosse MTU Board President