

City of Beloit Title VI Plan

Beloit Transit System (BTS)

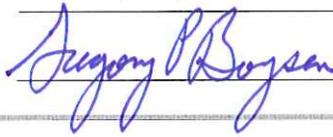
Approved on: May 27, 2014

Approved by: Michelle Gavin, Director of Transit

Revised on: May 27, 2014

This policy is hereby adopted and signed by:

Official Name/Title: Greg Boysen, P.E., - Director of Public Works

Official Signature: 

Policy Statement

The City of Beloit (hereafter BTS) as a recipient of Federal Transit Administration (FTA) grant dollars directly from FTA 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. Additionally, BTS monitors Rock County Council on Aging's Rock County Specialized Transit (RCST) Title VI program. BTS contracts with RCST for paratransit services in BTS's service area. RCST has completed their own Title VI Plan which can be obtained by contacting Rock County Council on Aging.

Title VI Plan Elements

The BTS'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

Note: Additional materials will be attached, if required.

TITLE VI Notice to the Public

The BTS's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

THE BELOIT TRANSIT SYSTEM (BTS)

- ✓ The **BTS** 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 the BTS.
- ✓ For more information on the BTS's civil rights program, and the procedures to file a complaint, contact the Director of Transit, phone: 608-364-2870; email gavinm@beloitwi.gov; or visit our administrative office at 1225 Willowbrook Road, Beloit, WI 53511 or the BTS Transfer Center located at 225 Shirland Avenue, Beloit, WI 53511. For more information, visit www.beloittransit.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 608-364-2870.
Si se necesita información en otro idioma de contacto, 608-364-2870.

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

- ✓ Agency website [www.beloittransit.com]
- ✓ Public areas of the administrative office
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules
- ✓ Transfer Center

Title VI Complaint Procedure

The BTS's Title VI Complaint Procedure is made available in the following locations: (*check all that apply*)

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the administrative office
- ✓ Transfer Center
- ✓ Available in appropriate languages for LEP populations (Spanish), meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the BTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

The BTS investigates complaints received no more than 180 days after the alleged incident. The BTS will process complaints that are complete.

Once the complaint is received, the BTS 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.

The BTS has 30 days to investigate the complaint. If more information is needed to resolve the case, BTS may contact the complainant.

The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the BTS 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 30 days after the date of the letter or the LOF to do so. Appeals can be directed to the City of Beloit Director of Public Works in writing or at 608-364-6690. Appeals will be reviewed by the Director following the same procedures and timelines above for the original complaint to BTS.

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

If information is needed in another language, then contact 608-364-2870. *Si se necesita información en otro idioma de contacto, 608-364-2870.*

Title VI Complaint Form

The BTS's Title VI Complaint Form is made available in the following locations: *(check all that apply)*

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the administrative office
- ✓ Transfer Center
- ✓ Available in appropriate languages for LEP populations (Spanish), meeting the Safe Harbor Threshold.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		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

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:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

Signature Date

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

Beloit Transit-Administrative Office
 Attention: Michelle Gavin Re: Title VI
 1225 Willowbrook Road
 Beloit, WI 53511

TITULO VI NOTICIA AL PÚBLICO

Aviso del BTS al público es siguiente:

Notificación al público de los derechos bajo el título VI

EL SISTEMA DE TRANSITO DE БЕLOIT (BTS)

- ✓ Los programas y servicios del **BTS** operan sin distinción de raza, color y nacionalidad de acuerdo con el Título VI de la ley de los derechos civiles. Cualquier persona que cree que él o ella han sido agraviados por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja al BTS.
- ✓ Para obtener más información sobre el programa de los derechos civiles de la BTS, y los procedimientos para presentar una queja, póngase en contacto con el Director de BTS, teléfono: 608 364 2870; TDD 608 364 2868; Correo electrónico (email) gavinm@beloitwi.gov . O visite nuestra oficina administrativa en 1225 Willowbrook Rd. Beloit, WI 53511. O en la estación de autobuses situados en 225 Shirland Avenue Beloit WI 53511.y para obtener más información puede usted visitar nuestra página (web site) www.beloittransit.com
- ✓ La persona afectada puede presentar una queja directamente ante la Administración Federal de Transito en la oficina de los Derechos Civiles, Atención: Coordinador del programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE Washington, DC, 20590.
- ✓ *Si necesita información en otro idioma, comuníquese al teléfono 608 3264 2870.*

El Departamento de Transito De Beloit (BTS) pone las notificaciones en los siguientes lugares:(Marque todas las que apliquen):

- ✓ Lugar de la oficina en la WEB (www.beloittransit.com)
- ✓ Zonas Públicas de la Oficina Administrativa
- ✓ Guías y Horarios
En la estación de los autobuses en Shirland Ave.

Título VI Procedimiento para poner una queja

Título VI Procedimiento para poner una queja en el Departamento de Transito (BTS) está a su disposición en las siguientes ubicaciones: (Marque todas las que apliquen):

- ✓ Sitio en la WEB del Departamento de Transito, ya sea como referencia al aviso al público en su totalidad
- ✓ Copia en la oficina del Departamento (BTS)
- ✓ En la Estación de los autobuses en Shirland Avenue
- ✓ Disponible en los idiomas adecuados para los diferentes tipos de poblaciones de LEP (Español) alcanzando los límites del (Safe Harbor Threshold).

Cualquier persona que cree que él o ella ha sido discriminado en base a su raza, color o su nacionalidad, por el departamento (BTS) se puede presentar una queja del Título VI, llenando y enviando el formulario de denuncias de la agencia Título VI.

El Departamento (BTS) investigara las quejas recibidas a más tardar 180 días, después del supuesto incidente. El Departamento (BTS) procesara las quejas que están completas.

Una vez recibida la queja, el departamento (BTS) revisara la queja para determinar si nuestra oficina tiene jurisdicción. La persona que mando la queja recibirá una carta de reconocimiento informándole si la queja será investigada por nuestra oficina.

El BTS tiene 30 días para investigar la queja. Si se necesita más información para resolver este caso, BTS Puede comunicarse con esta persona.

La persona que presente la queja tiene 10 días hábiles, desde el momento que envió esta carta para mandar toda la información solicitada para que la oficina pueda asignar una persona para este caso.

Si esta persona no es contactada por la persona que presento la queja, o no se pueda recibir más información adicional dentro del periodo de los 10 días, el BTS administrativamente puede cerrar el caso. Un caso puede ser cerrado administrativamente también si la persona que presentó la queja ya no desea seguir el caso.

Después que de que esta persona que fue asignada para revisar esta queja, él /ella emitirá una carta una que posiblemente será Carta final u otra Carta de Fallo (LOF)

- ✓ Una carta final con el resumen de las acusaciones y afirmando de que no hubo ninguna violación del Título VI y que el caso será cerrado.
- ✓ Una Carta de fallo (LOF) resume de las denuncias y las entrevistas sobre el presunto incidente y explicara cualquier acción disciplinaria, entrenamiento adicional para la persona del staff u otra acción disciplinaria.

Si la persona que presento la queja desea apelar la decisión, él/ella tiene 30días después de la fecha de la Carta o el (LOF) para hacerlo. Apelaciones pueden ser dirigidas a la Ciudad de Beloit al Director de obras Publicas por escrito o a el Teléfono 608-364-6690. La apelación será revisada por el Director de Obras Públicas siguiendo los mismos procedimientos mencionados en la parte de arriba de la queja original.

Una persona puede también hacer una queja directamente con el Federal Transit Administration, con dirección. FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.

Si se necesita información en otro idioma por favor hablemos 608-364-2870.

Formulario de Quejas Título VI

El BTS Título VI Formulario de Quejas se puede encontrar en las ubicaciones: (Marque todas las que apliquen)

- ✓ Sitio Web de la agencia, ya sea como en un aviso al público en su totalidad.
- ✓ Copia en la oficina administrativa.
- ✓ Estación de autobuses en Shirland Ave.
- ✓ Disponible en los idiomas apropiados para las poblaciones de LEP (Español) reconociendo (Safe Harbor Threshold).

Sección I:				
Nombre:				
Dirección:				
Teléfono (Hogar):			Teléfono (Trabajo):	
Correo Electrónico:				
Necesita requisitos especiales:	Letra Grande		Otro	
Sección II:				
Usted está presentando esta queja en su nombre?			Sí *	No
* Si contesta "Sí" a esta pregunta vaya a la Sección III.				
Sino, por favor suministrar el nombre y la relación de la persona a quien usted está haciendo la queja:				
Por favor explique por qué usted está haciendo esta queja por la otra persona:				
Por favor confirme que usted ha obtenido el permiso de la persona agraviada, para llenar este formulario en su lugar.			Sí	No
Sección III:				
Creo que la discriminación que he experimentado está basada. (Marque todas las que apliquen):				
<input type="checkbox"/> Raza	<input type="checkbox"/> Color		<input type="checkbox"/> Nacionalidad	
Fecha de la supuesta Discriminación (Mes, Día, Año): _____				
Explicar lo más claramente posible lo que paso y por qué usted cree fue discriminado. Describir a todas las personas que fueron involucradas. Incluir el nombre e información de contacto de la persona que discriminó (si lo conoce) así como los nombres e información de contacto de testigos. Si se necesita mas espacio para escribir, utilicé el dorso de este formulario.				

Sección IV				

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Recipient: Beloit Transit System (BTS)		
Contact Person: Michelle Gavin	Signature:	Date:

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

Recipient: Beloit Transit System (BTS)		
Contact Person: Michelle Gavin	Signature:	Date:

Strategies and Desired Outcomes

To promote inclusive public participation, the BTS will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Explore social media options in addition to other resources as a way to gain public involvement
- ✓ Explore outreach options to LEP and traditionally underserved populations, including targeted publications.
- ✓ Continue coordination with local advocacy organizations including Stateline Literacy Council and Latino Service Providers Coalition, etc.
- ✓ Continue coordination efforts with the Metropolitan Planning Organization (MPO) - Stateline Area Transportation Study (SLATS)
- ✓ Continue partnerships with other area public transit agencies including Janesville Transit System (JTS), Stateline Mass Transit District (SMTD) and Rock County Specialized Transit (RCST).

Documented Public Outreach

The direct public outreach and involvement activities conducted by the BTS are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to FTA upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Event Date	BTS Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes (Meeting size and format, location, Number of Attendees, etc.)
5/23/11		2011 TIP Amendment	Formal Public Notice 4/22/11 and 4/29/11	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
8/10/11	Gavin	Draft TIP/BTS Policies	Formal Public Notice 7/28/11 and 8/4/11	Open House	Rotary River Center
8/29/11		2011 TIP Amendment/2012 Draft TIP	Formal Public Notice 7/28/11 and 8/4/11	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
10/17/11	Gavin	2011 TIP Amendment/2012 Final TIP	Formal Public Notice 10/12/11	MPO Joint Technical/Policy Committees Meeting	Rotary River Center

4/16/12	Gavin	2012 TIP Amendment	Formal Public Notice 3/16/12 and 3/23/12	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
9/24/12	Gavin	Draft PIP Amendment/2013 Draft TIP	Formal Public Notice 8/10/12, 8/17/12, 8/28/12, 9/4/12	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
9/25/12		Draft PIP Amendment/2013 Draft TIP	Formal Public Notice 8/10/12, 8/17/12, 8/28/12, 9/4/12	Open House	Rotary River Center
11/5/12	Gavin	Final PIP/2013 Final TIP	Formal Public Notice 8/10/12, 8/17/12, 8/28/12, 9/4/12	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
6/13/13		2013 TIP Amendment	Formal Public Notice	Open House	Rotary River Center
7/15/13	Gavin	2013 TIP Amendment	Formal Public Notice	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
9/11/13		BTS Title VI/LAP Review/2014 Draft TIP	Formal Public Notice 8/30/13 and 8/31/13	Open House	Rotary River Center
9/30/13	Gavin	2014 Draft TIP	Formal Public Notice 8/30/13 and 8/31/13	MPO Joint Technical/Policy Committees Meeting	Rotary River Center
10/28/13		2013 TIP Amendment/2014 Final TIP	Formal Public Notice 8/30/13 and 8/31/13	MPO Joint Technical/Policy Committees Meeting	Rotary River Center

Language Assistance Plan

Plan Components

As a recipient of federal FTA funding, the BTS 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.

Most individuals in BTS's service area read, write, speak and understand English. There are some individuals for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they are considered limited English proficient, or "LEP."

The BTS'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, the BTS 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:** What is the number or proportion of LEP persons served and the languages spoken in the service area?

Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires BTS to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

¹ DOT LEP guidance <https://www.civilrights.dot.gov/page/dots-lep-guidance>

US Census and American Community Survey (ACS) Data²

BTS did the following:

1. Inserted a copy of the City of Beloit's LEP data in the Title VI plan. This data is from the ACS, 2008-2012 American Community Survey 5-Year Estimates (Appendix 1)
 2. BTS analyzed the LEP demographic data for the BTS's program and/or service area by calculating the *Safe Harbor Threshold* language groups identified other than English.
 - 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 City of Beloit.
 - 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) BTS 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 City LEP data in the demographic section of the *Four Factor Analysis*.
- **Factor 2: Frequency:** How often does your staff come into contact with LEP persons?

Overview

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 BTS 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.

- **Factor 3: Importance:** How does the program, service or activity affect people's lives?

Overview

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>

The summary below discusses how the BTS's program and services impact the lives of person's within the community. BTS will specify the community organizations that serve LEP persons, if available.

- **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the methods used by the BTS to provide outreach to LEP persons as well as train staff (and/or its contractor/lessee) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, BTS will address 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.

BTS – 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>

Factor 1 – Demography

The majority of BTS's service area is contained within the City of Beloit, WI although some routes are adjacent to the surrounding townships and there is an express route connecting to the City of Janesville. If we use County data to capture these additional areas, we exceed the Safe Harbor Threshold for only Spanish-speaking LEP persons in number (4,354) but not percentage (roughly 3% Spanish-speaking LEP persons county-wide. Based on the City of Beloit's population, that percentage jumps to roughly 7% (based on 2,367 individuals), and so that was the data we used. The next three highest LEP populations within the City of Beloit are Russian (32 individuals), Tagalog (31 individuals) and other Asian languages (20 individuals).

Factor 2 – Frequency

The BTS staff will be trained on what to do when they encounter a person that speaks English less than well. The BTS will track the number of encounters and consider making adjustments as needed to outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the BTS's programs and services.

BTS assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, BTS has had no requests for interpreters, no requests for translated BTS documents and no complaints.

Factor 3 – Importance

The BTS understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A public transit system is a key link to connecting LEP persons to these essential services.

For that reason, BTS will strive to consider, notify, and involve LEP persons whenever decisions are made regarding transportation issues, transit planning or projects.

Factor 4 – Resources and Costs

Even though the BTS does not have a separate budget for LEP outreach, BTS is committed to reaching LEP persons. For example, the BTS has access to Spanish speaking employees working in other departments within the City of Beloit. This has ensured that riders may request materials printed and on-line in Spanish. In addition, the BTS works with local advocacy groups (SLC and LSPC), the School District of Beloit and the SLATS MPO to reach LEP populations.

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

The BTS has access to Spanish speaking employees working in other departments within the City of Beloit as well as the local advocacy groups mentioned above should translation or interpretive services be needed. In addition, BTS plans to develop a Spanish version of its Riders Guide. This is temporarily on hold until an ongoing study of possible route structure changes is completed. BTS has Spanish versions of their Non-Discrimination Notices and the Complaint Forms. Also, BTS issues Spanish/English translation pocket booklets to their operators.

BTS will display a language identification chart at public meetings, at the transfer center and at the administrative office to help LEP individuals identify their language to BTS staff. BTS will work with existing resources to provide low-cost language assistance to the best extent possible.

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

The BTS does the following to inform LEP persons of the availability of language assistance services: currently working to publish timetables and route maps in Spanish, translation of vital documents, creating and posting multi-language announcements and other information.

The BTS works with local advocacy groups (SLC and LSPC) and the Director of Transit is a past board member of the SLC. A link to on-line translation widgets is provided on the BTS website for instant translation of applicable web content. The cost is relatively low but the ability to reach the LEP population is high. The BTS will continue to reach out to LEP populations through these efforts.

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

The BTS reviews its plan on an annual basis or more frequently as needed. In particular, the BTS 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, if relevant, the BTS will meet with its contractor/transit provider to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on 05/02/2014.

At a minimum the LAP will be updated every three years in conjunction with the Title VI program and Triennial review process.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

BTS employees are educated on the principles of Title VI and the BTS's Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. An important discussion point is that of language assistance. English to Spanish pocket guides will be provided to all drivers. If a driver, dispatcher or employee needs further assistance related to LEP program participants, he/she will work with the BTS's Transit Director to identify strategies to meet the language needs of the participants of the program or service.

As part of our annual check in meeting, if relevant, the BTS will meet with its contractor/transit provider to discuss updates the BTS's Language Assistance Plan.

Minority Representation Information

A. Minority Representation Table

BTS is a Division of the City of Beloit, Wisconsin, a general-purpose unit of government governed by elected officials. No non-elected advisory committees exist for BTS. Occasionally, advisory committees are created on an ad hoc basis. In such instances, it is hereby the expressed policy of BTS management that efforts will be made to appoint and involve minorities.

B. Efforts to Encourage Minority Participation

The BTS understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. Occasionally, advisory committees are created on an ad hoc basis. In such instances, it is, hereby, the expressed policy of BTS management that efforts will be made to appoint and involve minorities on these advisory committees.

Minority Representation Data Collection Form

Ad-Hoc Committee (Name TBD as needed)

Date:

Dear Member,

As the BTS 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 the BTS 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, or national origin under Title VI.

As a committee under the jurisdiction of the BTS, we invite committee 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
(For when recipient is constructing a facility)

Completed By		
Name:	Signature:	Date:

Subrecipient:	
Facility Type:	
Site Location Address:	
Project Description:	
Project Timeline:	
Analysis of Site Location <i>Compare the equity impact of various site alternatives</i>	
Site Justification	
Outreach Activities <i>List outreach methods used to engage persons potentially impacted by the facility site</i>	

Notes:

- ✓ The definition of "facility" includes storage facilities, maintenance facilities and operation centers. For purposes of this requirement, "facilities" **does not** include bus shelters, transit stations, power substations, as these are transit amenities and are evaluated during project development and the NEPA process.
- ✓ The Title Vi equity analysis must occur before the selection of the preferred site.
- ✓ If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

Fixed Route Service Standards
(For all Fixed Route Transit Providers)

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 32 seated + 24 standee passengers for 35-foot low-floor buses.

2. Expressed in tabular format

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Load Factor
35' Low Floor Bus	32	24	56	1.75

Vehicle Headway Standards

1. Expressed in writing

Vehicle headways on all regular BTS weekday routes are 40 minutes. Most BTS Saturday routes function on 80-minute headways with the exception of Route 4 that has a 40-minute headway. Shorter headways, although desirable, are prohibitive for budgetary reasons at BTS.

Expressed in tabular format

Policy Headways and Periods of Operation

WEEKDAY	Peak	Base	Evening	Night
Route 1	40	40	--	--
Route 2	40	40	--	--
Route 3	40	40	--	--
Route 4	40	40	--	--
Aldrich Tripper	40	40	--	--
Beloit-Janesville Express	60	60	--	--

*Weekday 6 am-5:20pm depending on route
"--" means no service is provided during that time period*

SATURDAY	Peak	Evening	Night
Route 1	40	--	--
Route 2	40	--	--
Route 3	40	--	--
Route 4	40	--	--
Aldrich Tripper	--	--	--
Beloit-Janesville Express	--	--	--

*Saturday 9 or 9:40am-3:30 or 4pm depending on route
"--" means no service is provided during that time period*

On-Time Performance Standards

At BTS a vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than five minutes late. The BTS on-time performance objective is 90% or greater. BTS continuously monitors on-time performance and system results are published as part of monthly performance reports covering all aspects of operations. For paratransit service, BTS relies on the RCST standard of arriving to pick up patrons no more than 15 minutes before or after the scheduled appointment. Again, the on-time performance objective is that 90% of all pickups occur within this 30-minute window.

RCST DATA 2012-April 2014	FY12	FY13	FY14
Trip Denial rate	0	0	0
On-time performance rate	Median time (difference from scheduled to actual): 0:05:38 minutes	Median time (difference from scheduled to actual): 0:05:05 minutes	Median time (difference from scheduled to actual): 0:04:58 minutes
Number of missed trips	0	0	0
Number of excessively long trips	0	0	0

Service Availability Standards

BTS strives to make transit service available such that 90% of all residents within the greater Beloit area do not have to walk more than ½ mile to a bus route.

Fixed Route Service Policy

Vehicle Assignment Policy

Vehicle assignment is a moot point in the BTS system from the standpoint of discrimination for the following reasons: The bus route structure and route interlining dictate that all BTS routes traverse areas with high concentrations of minorities and low income households. All BTS buses are similar vintage, identical make and model, identically sized, maintained in excellent condition and all are identically equipped. All buses are fully maintained. Bus assignments are rotated periodically as needed for maintenance and warranty mileage maximization (longer routes).

Transit Amenities Policy

Installation of transit amenities (benches, signage, and shelters) are based on the number of passenger boarding's at stops and stations along the routes.

AMERICAN
FactFinder



B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over

2008-2012 American Community Survey 5-Year Estimates

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.

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.

	Beloit city, Wisconsin	
	Estimate	Margin of Error
Total:	34,459	+/-270
Speak only English	28,572	+/-696
Spanish or Spanish Creole:	5,122	+/-604
Speak English "very well"	2,755	+/-403
Speak English less than "very well"	2,367	+/-419
French (incl. Patois, Cajun):	20	+/-24
Speak English "very well"	7	+/-13
Speak English less than "very well"	13	+/-19
French Creole:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Italian:	67	+/-56
Speak English "very well"	54	+/-52
Speak English less than "very well"	13	+/-21
Portuguese or Portuguese Creole:	16	+/-20
Speak English "very well"	11	+/-17
Speak English less than "very well"	5	+/-10
German:	61	+/-46
Speak English "very well"	47	+/-42
Speak English less than "very well"	14	+/-20
Yiddish:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Other West Germanic languages:	2	+/-5
Speak English "very well"	2	+/-5
Speak English less than "very well"	0	+/-20
Scandinavian languages:	21	+/-25
Speak English "very well"	21	+/-25
Speak English less than "very well"	0	+/-20
Greek:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Russian:	60	+/-74
Speak English "very well"	28	+/-48
Speak English less than "very well"	32	+/-40
Polish:	13	+/-20

	Beloit city, Wisconsin	
	Estimate	Margin of Error
Speak English "very well"	0	+/-20
Speak English less than "very well"	13	+/-20
Serbo-Croatian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Other Slavic languages:	35	+/-43
Speak English "very well"	35	+/-43
Speak English less than "very well"	0	+/-20
Armenian:	0	+/-20
Speak English "very well"	0	+/-20
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:	3	+/-7
Speak English "very well"	3	+/-7
Speak English less than "very well"	0	+/-20
Other Indic languages:	8	+/-13
Speak English "very well"	0	+/-20
Speak English less than "very well"	8	+/-13
Other Indo-European languages:	21	+/-154
Speak English "very well"	12	+/-92
Speak English less than "very well"	9	+/-62
Chinese:	40	+/-35
Speak English "very well"	21	+/-25
Speak English less than "very well"	19	+/-19
Japanese:	12	+/-15
Speak English "very well"	12	+/-15
Speak English less than "very well"	0	+/-20
Korean:	12	+/-15
Speak English "very well"	9	+/-14
Speak English less than "very well"	3	+/-6
Mon-Khmer, Cambodian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Hmong:	35	+/-52
Speak English "very well"	19	+/-28
Speak English less than "very well"	16	+/-25
Thai:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Laotian:	63	+/-92
Speak English "very well"	63	+/-92
Speak English less than "very well"	0	+/-20
Vietnamese:	59	+/-55
Speak English "very well"	43	+/-42
Speak English less than "very well"	16	+/-19
Other Asian languages:	20	+/-30
Speak English "very well"	0	+/-20
Speak English less than "very well"	20	+/-30
Tagalog:	114	+/-103
Speak English "very well"	83	+/-67
Speak English less than "very well"	31	+/-46

	Beloit city, Wisconsin	
	Estimate	Margin of Error
Other Pacific Island languages:	25	+/-29
Speak English "very well"	25	+/-29
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:	1	+/-9
Speak English "very well"	1	+/-9
Speak English less than "very well"	0	+/-20
Hungarian:	0	+/-20
Speak English "very well"	0	+/-20
Speak English less than "very well"	0	+/-20
Arabic:	16	+/-17
Speak English "very well"	16	+/-17
Speak English less than "very well"	0	+/-20
Hebrew:	11	+/-19
Speak English "very well"	11	+/-19
Speak English less than "very well"	0	+/-20
African languages:	25	+/-30
Speak English "very well"	25	+/-30
Speak English less than "very well"	0	+/-20
Other and unspecified languages:	5	+/-8
Speak English "very well"	5	+/-8
Speak English less than "very well"	0	+/-20

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.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 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 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. 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.
2. 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.
3. An "!" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. 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.
6. An "*****" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. 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.
8. An "(X)" means that the estimate is not applicable or not available.