

# **Title VI Program**

## **Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The City of Stoughton is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide the City of Stoughton in its administration and management of Title VI-related activities.

## **City of Stoughton**

The City of Stoughton provides a shared-ride service. This is a curb to curb service, not a fixed route. Service is demand responsive. Advance reservations are allowed. Our shared-ride taxi service is available to the general public.

## **Title VI Coordinator Contact information**

Laurie Sullivan  
City of Stoughton  
381 E Main Street  
Stoughton, WI 53589  
608-873-6677

## **Title VI Policy Information**

### Employee Education

Title VI information is disseminated to all City of Stoughton third-party transit contracted employees via the *Employee Education Form* (Attachment A-1). This form reminds employees of their Title VI responsibilities in their daily work and duties. City of Stoughton will determine how frequently the *Employee Education Form* should be reviewed with these employees.

All employees involved with the transit service, shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt. (Attachment A-2).

## Record Keeping

The City of Stoughton maintains permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of City of Stoughton Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

The Title VI Assurance/Certification form is submitted with grant application materials to WisDOT on an annual basis for each grant program in which it participates. This form is used to specify whether Title VI complaints have been filed.

## **Title VI Public Notification**

Title VI policy (Attachment B) is publicly displayed at City Hall, in shared-ride vehicles and on the City of Stoughton website. <http://www.ci.stoughton.wi.us/>

## **Title VI Complaint Procedure**

An individual may email to request a complaint [lsullivan@ci.stoughton.wi.us](mailto:lsullivan@ci.stoughton.wi.us), may visit the website to find the form <http://www.ci.stoughton.wi.us/>, or may write the address below.

### How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty 180 days from the date of the alleged discrimination. The *Title VI Complaint Form* (Attachment C) may be used to submit the complaint information. The complaint may be filed in writing with City of Stoughton at the following address:

City of Stoughton  
Laurie Sullivan  
381 E. Main St  
Stoughton, WI 53589

### What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service provided by City of Stoughton Shared-Ride Taxi will be directly addressed by the City of Stoughton. City of Stoughton shall also provide appropriate assistance to complainants. Additionally, City of Stoughton shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Attachment C-1). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

City of Stoughton will notify WisDOT-Transit Section of the complaint at:

WisDOT-Transit Section, Chief  
4802 Sheboygan Avenue, Room 951  
Madison, WI 53707

How will the complainant be notified of the outcome of the complaint?

Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner. City of Stoughton will send a final written response letter (Attachment C-2/C-3) to the complainant.

In the letter notifying complainant that the complaint is substantiated (Attachment C-2), it is explained that efforts are underway to correct deficiencies and if needed they would be called upon in the even that there is a hearing.

In the letter notifying complainant that the complaint is not substantiated (Attachment C-3), the complainant is also advised of his or her right to: 1) appeal within seven calendar days of receipt of the final written decision and/or 2) file a complaint externally with the Federal Transit Administration.

Federal Transit Administration, Region  
V Attention: Title VI Program  
Coordinator 200 West Adams Street,  
Suite 320 Chicago, IL 60606

**Investigations/Complaints/Lawsuits**

The City of Stoughton has had no complaints to date on file. There have been no investigations or lawsuits conducted.

**Public Involvement**

All City of Stoughton Council meetings are open to the public and televised.

When considering a change to the transit service and/or fares there will be a notice posted in the newspaper, on the city website under the Taxi section, and on the city cable television channel in adequate advance to solicit the publics’ input.

The city’s website offers a standing location with the contact information for any concerns, suggestions, or questions.

**Language Assistance Plan**

U.S. Census Bureau American Fact Finder Data

	Population City of Stoughton: 12,077	% of Population
<b>Speak only English</b>	11,728	97.1102%
<b>Spanish or Spanish Creole:</b>		
Speak English less than “very well”	42	.003478%
<b>Other Indo-European :</b>		
Speak English less than “very well”	44	.003644%
<b>Asian and Pacific Island:</b>		
Speak English less than “very well”	17	.001408%

As depicted in the above chart, the most section of individuals that speak a language other than English is the Other Indo-European. 44 or .003644% of that population speaks English less than very well. That amount is well below the required threshold set by Safe Harbor that states 5% or 1,000 individuals to in-act translation services. At this current time the City of Stoughton does not feel that it is necessary to offer translation services. This is something that is always under

review however; we will check with the fact finder information routinely and be in contact with our provider and if the need arises this will be re-assessed.

A large population of our ridership is comprised of handicap and elderly citizens. Typically these citizens are not able to provide for their own transportation; therefore the shared-ride taxi service is of great benefit to these individuals. The City of West Bend understands that these individuals and all individuals in the city rely on our service to get to essential destination such as work, doctors' appointments, school, and shopping.

Again, the need for LEP assistance in other languages will be constantly reviewed. We currently do not have a budget for outreach at the current time, however if the need changes and requires a more in-depth LEP plan we will look into creating a budget for this.

### **Non-Elected Committees**

The City of Stoughton does not have any transit-related planning committees or advisory boards.

### **Land Acquisition**

The City of Stoughton had no projects that required land acquisition.

## Attachment A-1

### Employee Education Form – Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the City of Stoughton third-party transit contractor are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a complaint, direct him or her to the City Coordinator.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

Attachment A-2

Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the City of Stoughton Title VI Policy. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

Attachment B

**CITY OF STOUGHTON**  
**Title VI**

The City of Stoughton Shared-Ride Taxi Service is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected under Title VI of the Civil Rights Act. Any person who believes they have been wronged by any unlawful discriminatory means under Title VI may file a complaint with the City of Stoughton.

For more information on the City of Stoughton transit civil rights program visit our website <http://www.ci.stoughton.wi.us/>, [email lsullivan@ci.stoughton.wi.us](mailto:lsullivan@ci.stoughton.wi.us), write Laurie Sullivan, 381 E. Main St, Stoughton, WI 53589, or call 608-873-6677

Any complaint may also be filed directly with the Federal Transit Administration. File to the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, D.C, 20590.

Attachment C

**Title VI Complaint Form**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: (home) \_\_\_\_\_ (cell) \_\_\_\_\_

Person discriminated against (if other than you): \_\_\_\_\_

Address of person discriminated against (if other than you):  
\_\_\_\_\_

City, State, Zip Code:  
\_\_\_\_\_

Please indicate why you believe the discrimination occurred:  
\_\_ Race \_\_ Color \_\_ National Origin

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Describe the alleged discriminatory action: (add extra sheets if necessary)  
\_\_\_\_\_  
\_\_\_\_\_

Please list any and all witnesses' names and phone numbers:  
\_\_\_\_\_  
\_\_\_\_\_

What steps have you taken to address the conflict or problem?  
\_\_\_\_\_  
\_\_\_\_\_

What type of corrective action took place?  
\_\_\_\_\_  
\_\_\_\_\_

What remedy are you seeking?  
\_\_\_\_\_

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator:

\_\_\_\_\_  
Complainant Signature                      Print your name                      Date

**Mail Completed Form:** City of Stoughton  
Attn: Laurie Sullivan  
381 E. Main Street  
Stoughton, WI  
53589

Attachment C-1

Sample Letter Acknowledging Receipt of Complaint

Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, WI 53531

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against City of Stoughton alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (262) 335-5107, or write to me at the address indicated below.

City of Stoughton  
Laurie Sullivan  
381 E. Main Street  
Stoughton, WI 53589

Sincerely,

Laurie Sullivan  
Finance Director/Treasurer

Attachment C-2

Letter Notifying Complainant that the Complaint Is Substantiated

Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, WI 53531

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the City of Stoughton alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from state or federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Laurie Sullivan  
Finance Director/Treasurer

Attachment C-3

Letter Notifying Complainant that the Complaint Is Not Substantiated

Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, WI 53531

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against the City of Stoughton alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The City of Stoughton has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from SJCTA, and/or 2) file a complaint externally with Federal Transit Administration at:

Federal Transit Administration, Region  
V Office of Civil Rights  
Attention: Title VI Program Coordinator  
200 West Adams Street, Suite 320  
Chicago, IL 60606

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Laurie Sullivan  
Finance Director/Treasurer