

**North Central Wisconsin Regional Planning Commission (NCWRPC)**

**Title VI Nondiscrimination Program and  
Limited English Proficiency Plan**

Date: 10/25/2023

## Title VI Non-Discrimination Program and Limited-English Proficiency (LEP) Plan

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This **NCWRPC** *Title VI Non-Discrimination Program and Limited-English Proficiency (LEP) Plan* and other **NCWRPC** documents, meeting minutes and agendas, and other information may also be obtained on our website at <https://www.ncwrpc.org>.

To request this document in an alternate format, please contact:

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Si se necesita informacion en otro idioma de contacto 715-849-5510.

Yog hais tias cov lus qhia uas yuav tsum tau nyob rau hauv lwm hom lus, hu rau 715-849-5510.

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# Title VI Non-Discrimination Program

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## Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Several other federal legal authorities supplement Title VI by extending protections based on age, sex, disability, limited English proficiency, and low-income status. In addition, the Civil Rights Restoration Act of 1987 clarified Title VI enforcement by mandating that Title VI requirements apply to all programs and activities of federal-aid recipients regardless of whether any particular program or activity involves federal funds. Taken together, these laws require recipients and subrecipients of federal funds to ensure all programs and services are delivered to the public without discrimination.

NCWRPC, as a recipient of federal financial assistance, will ensure compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); FTA Circular 4702.1b (Title VI Requirements and Guidelines for Federal Transit Administration Recipients); and related statutes and regulations. NCWRPC acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

This plan explains the how the NCWRPC incorporates the requirements of Title VI and related legal authorities into its operations. The plan will be used a reference for NCWRPC and an informational resource for the public. The plan will be updated every three years to reflect changes in Title VI compliance operations.

## Organizational Responsibilities

The Title VI Coordinator is responsible for overseeing compliance with applicable nondiscrimination authorities in each transportation planning and programming area at NCWRPC. The Title VI Coordinator ensures compliance with provisions of the law, including the requirements of 23 part 200 and 49 CFR Part 21, administering civil rights complaint procedures, and ensuring civil rights compliance by recipients, sub-grantees, contractors, and subcontractors.

NCWRPC's Executive Director is responsible for ensuring the implementation of the NCWRPC's overall Title VI Non-Discrimination Program.

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## Title VI Non-Discrimination Responsibilities

The Civil Rights Coordinator ensures Title VI/Nondiscrimination compliance in accordance with NCWRPC's federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/ADA compliance.

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of NCWRPC's nondiscrimination requirements, including the following activities:



- ✓ Program Administration
  - Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
  - Develop and implement NCWRPC's Title VI/Nondiscrimination and LEP Plan
  - Update and maintain Title VI/Nondiscrimination and LEP program policies and procedures
- ✓ Complaints
  - Review, track, investigate and close Title VI/Nondiscrimination and LEP complaints
- ✓ Employee Training
  - Train staff on Title VI/Nondiscrimination and LEP requirements and procedures
- ✓ Reporting
  - Prepare and submit Title VI/Nondiscrimination reports per state and federal regulations
- ✓ Public Dissemination
  - Notify the public of the NCWRPC's Nondiscrimination requirements via NCWRPC's public area, on its website, in vehicles, etc.
- ✓ Oversight
  - Ensure contractors and lessees adhere to Title VI/Nondiscrimination and LEP requirements

NCWRPC's Transportation Planner is responsible for the implementation of NCWRPC's federally funded transportation planning program. The Transportation Planner has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **NCWRPC's** Executive Director.

Darryl Landeau, Transportation Planner

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## Content of Title VI Program

NCWRPC, as a subrecipient of FTA funds, must submit to the Wisconsin Department of Transportation, which are the primary recipients of transit funds:

- All **general requirements** set out in [FTA Circular 4702.1B](#);
- A **demographic profile of the metropolitan area** that includes identification of the locations of minority populations in the aggregate;
- A description of the **procedures** by which the mobility needs of minority populations are identified and considered within the planning process;
- **Demographic maps** that overlay the percent minority and non-minority populations by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes; and,
- An **analysis of impacts** that identify any disparate impacts on the basis of race, color, or national origin; legitimate justification for the policy that resulted in the disparate impacts; and alternatives that could be employed that would have a less discriminatory impact.



## General Requirements

The general requirements outlined in [FTA Circular 4702.1B](#), *Title VI Requirements and Guidelines for Federal Transit Administrative Recipients* applicable to NCWRPC are as follows:

- ✓ Providing Title VI assurances and Implementation Plan Agreement
- ✓ Preparing and submitting a Title VI Program
- ✓ Notifying beneficiaries of protection under Title VI
- ✓ Developing Title VI/Non-Discrimination complaint procedures and complaint form
- ✓ Recording and reporting Title VI/Non-Discrimination investigations, complaints, and lawsuits
- ✓ Promoting inclusive public participation
- ✓ Demographic representation on planning and advisory bodies
- ✓ Providing meaningful access to Limited-English Proficient (LEP) persons

### A. NOTIFYING BENEFICIARIES OF PROTECTION UNDER TITLE VI

[FTA Title VI Circular 4702.1B](#) requires NCWRPC as a recipient of federal financial assistance to notify the public of its obligations under U.S. DOT Title VI regulations and the protections against discrimination afforded to them by Title VI.

Title VI regulations require NCWRPC to inform the public of their rights under Title VI by posting a *Notice of Nondiscrimination*. The *Notice of Nondiscrimination* should be posted in the following locations: agency website, public area(s) of the agency office, and as applicable, inside vehicles, rider guides/schedules, and transit shelters/facilities.

The public notice must include a statement of nondiscrimination, information on how to request additional information about the agency's Title VI obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI information in another language.

NCWRPC's *Notice of Nondiscrimination* is provided in the following locations:

- Agency website - <https://www.ncwrpc.org>
- Agency office - Bulletin Board

In English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the NCWRPC at 715-849-5510 if additional information is needed in another language.

To view a copy of NCWRPC's *Notice of Nondiscrimination*, please see **Appendix C**.



## B. DEVELOPING TITLE VI/NON-DISCRIMINATION COMPLAINT PROCEDURES AND COMPLAINT FORM

NCWRPC, as a subrecipient of federal financial assistance must develop a procedure for investigating, tracking, and resolving Title VI/Nondiscrimination and LEP complaints and make the procedures available to the public upon request.

Any person, group or firm that believes it has been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited-English proficiency (LEP) by the NCWRPC may file a civil rights complaint.

The scope of civil rights complaints covers all internal and external NCWRPC activities. Adverse impacts resulting in civil rights complaints can arise from many sources including the delivery of programs and services, or advertising, bidding, and contracts.

Complaints can originate from individuals or firms alleging inability to bid upon or obtain a contract with the NCWRPC for the furnishing of goods and services. Examples may include advertising for bid proposals, prequalification, or qualification requirements, bid awards, and/or selection of contractors, subcontractors, vendors, consultants, etc.

Complaints can also originate as a result of project and program impacts on individuals or groups such as access to programs, activities, and services.

NCWRPC's *Complaint Procedure* and *Complaint Form* are shown in [Appendix C](#) and are made available in the following locations:

- Agency website at <https://www.ncwrpc.org/>
- Agency office (See Executive Director)

## C. COMPLAINT LOG

### CIVIL RIGHTS INVESTIGATIONS

Recipients of federal financial assistance are required to maintain a list of any complaints alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status of the complaint, investigation, or lawsuit, actions taken by the recipient in response, and final findings related to the complaint, investigation, or lawsuit.

[Appendix C](#) includes NCWRPC's procedure and tracking mechanism to investigate, track, and resolve civil rights complaints.

Since the last update of this [Title VI/Nondiscrimination Program/LEP Plan](#), there has been no transportation-related civil rights investigations, complaints, or lawsuits filed with the NCWRPC.





## D. PROMOTING INCLUSIVE PUBLIC INVOLVEMENT

Recipients of federal financial assistance are required to develop a public involvement plan that includes outreach strategies and participation techniques to engage the public including minority, low-income, and limited English proficient (LEP) populations, as well as a summary of outreach efforts made since the last Title VI/ADA Nondiscrimination Plan.

While traditional means of seeking public involvement may not reach all individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

Per [FTA Circular 4702.1B, Chapter VI-3 \(Planning\)](#), NCWRPC works to ensure its members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow these populations to participate fully in the process.

### Strategies and Desired Outcomes

To promote inclusive public participation, NCWRPC employs the following strategies, as appropriate:

- ✓ Provide for early, frequent, and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times.
- ✓ Employ different meeting sizes and formats.
- ✓ Use social media in addition to other resources as a way to gain public involvement.
- ✓ Use newspaper ads in publications that serve LEP populations.
- ✓ Expand traditional outreach methods.

### Public Outreach Activities

The NCWRPC strives to find innovative ways to engage the minority and low income populations and overcome any cultural differences that may preclude them from being involved in the transportation planning process in the North Central Region. See [NCWRPC's website](#) for a complete list of public involvement efforts.

- NCWRPC Staff participated in an exhaustive number of public meetings and open houses pertaining to projects being conducted in the Region. All of the meetings were held to get more people involved in the decision-making process and inform them of the impacts of the projects.
- The NCWRPC continued to utilize its website and social media to disseminate information in a timely, visual, electronic format. The [www.ncwrpc.org](http://www.ncwrpc.org) and [www.facebook.com/ncwrpc/](http://www.facebook.com/ncwrpc/) sites are the main focus for this effort.
- The NCWRPC held workshops with broad participation in all ten counties to create county locally developed, human services - public transit transportation coordination plans to address accessibility needs for the elderly and disabled populations across the Region in 2023.
- Through its Regional Safe Routes to School Program, the NCWRPC has worked with diverse stakeholder groups to plan for safer alternative transportation systems for various areas of the Region. Each planning process includes surveys distributed in English, Spanish and Hmong.



Future Outreach

- Continue to develop and articulate how the area will address issues pertaining to involvement of minority and low-income populations in the planning and project development process by expanding the outreach and involvement efforts.
- Develop an updated Title VI Non Discrimination Program/Limited English Proficiency Plan for the Region on WisDOT rotation cycle.
- Utilize the recommendations from the Public Participation Plan to be more engaged with the public, specifically using social media.
- Continue to maintain the internet and social media presence for the Region to disseminate information in a timely, visual, electronic format.

E. DEMOGRAPHIC REPRESENTATION ON PLANNING AND ADVISORY BODIES

NCWRPC understands that diverse representation on boards, councils, and committees help results in sound policy reflective of the needs of the entire population. [FTA Title VI Circular 4702.1B](#) requires recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, to report membership of these committees broken down by race and include a description of efforts made to encourage the participation of minorities on these committees.

The NCWRPC Policy Board or Commission is the sole decision-making body of the NCWRPC. The Commission is comprised of representatives appointed by each member county and the Governor of the State of Wisconsin, as such, NCWRPC does not have control over representation on the Policy Board.

Demographic representation on the NCWRPC Policy Board and Executive Committees is illustrated in **Table 2**. NCWRPC recognizes that the minority representation on its board is not reflective of the minority representation of its planning area, so the NCWRPC encourages its counties and the Governor’s Office to identify and recruit minorities to fill vacancies as they arise.

The public is invited to attend all Commission meetings. NCWRPC staff encourages participation by all racial groups in Commission meetings, public information meetings, etc. as outlined in the NCWRPC’s Public Participation Plan, see Section D, above. The **NCWRPC** strives to expand its efforts with more direct and better targeting.

**Table 2: Ethnic and Racial Composition of NCWRPC Committees and Planning Area**

Committee	Hispanic or Latino	White Alone	Black or African American Alone	Asian Alone	American Indian or Alaska Native Alone	Native Hawaiian and Other Pacific Islander Alone	Some Other Race
Planning Area	2.88%	90.1%	0.8%	2.7%	1.2%	0.02%	2.41%
Policy Board	0%	100%	0%	0%	0%	0%	0%
Executive Committee	0%	100%	0%	0%	0%	0%	0%

Source: B03002 Hispanic or Latino Origin by Race, 2017-2021 ACS 5-Year Estimates, US Census Bureau.



## F. Providing Meaningful Access to Limited-English Proficient Persons

As a recipient of federal USDOT funding, NCWRPC is required under [Title VI of the Civil Rights Act of 1964](#) and [Executive Order 13166](#) to develop and implement a plan to ensure accessibility to its programs and services for persons who are not proficient in the English Language.

Please see the [Limited-English Proficiency Plan](#) included in this document.

## Demographic Profile, Procedures, and Impacts

As part of the Title VI Program, NCWRPC monitors and tracks statistical demographic data as it becomes available on race, ae, language spoken, income level, persons with disabilities, and sex of the population of the NCWRPC area.

### DEMOGRAPHIC PROFILE

The NCWRPC is a ten county region located in north-central Wisconsin. The total population of the Region is about 439,270 (2016-2020 ACS). The racial make up of the Region as a whole is 90.1% white with Hispanic/Latino comprising 2.88%, followed closely by Asian, primarily Hmong, at 2.7%. Native Americans make up 1.2% of the Region overall, while African Americans comprise 0.8%. Map 1 shows the overall minority population concentration by Census block group across the Region.

A minority person in NCWRPC planning area is defined as a person who identifies as Hispanic and/or a racial group other than White Alone. The minority percentages by planning area county are shown in **Table 3**. As calculated from B03002 Hispanic or Latino by Race, 2016-2020, minorities make up 9.9% of the planning area population. In NCWRPC's ten county region, **Table 3** shows the following:

- ✓ The blue highlights in show the two largest racial groups in each county.
- ✓ Forest County has the lowest population with 9,003 persons and is the most diverse; 13.8% is American Indian and Alaska Native alone and 2.74% are Hispanic or Latino.
- ✓ Vilas County is the second most diverse county with 9.2% American Indian and Alaska Native alone and 2.59% are Hispanic or Latino.
- ✓ Marathon County is the most populated county with 135,485 persons and is the county with the largest Asian population at 5.4% and largest Hispanic or Latino population at 2.88%.
- ✓ The remaining seven counties have non-minority population (White Alone) at or above 90%.

From the NCWRPC's previous Title VI Plan we can see that the population of the NCWRPC area is gradually diversifying, with a drop in the White-only population from 91.12% in 2017 to 90.1% in 2020. However, the new census-defined category of Two or More Races complicates this analysis. The 2020 Census was the first decennial census that allowed individuals to self-identify with more than once race which likely led to a larger reduction in the White-only population.

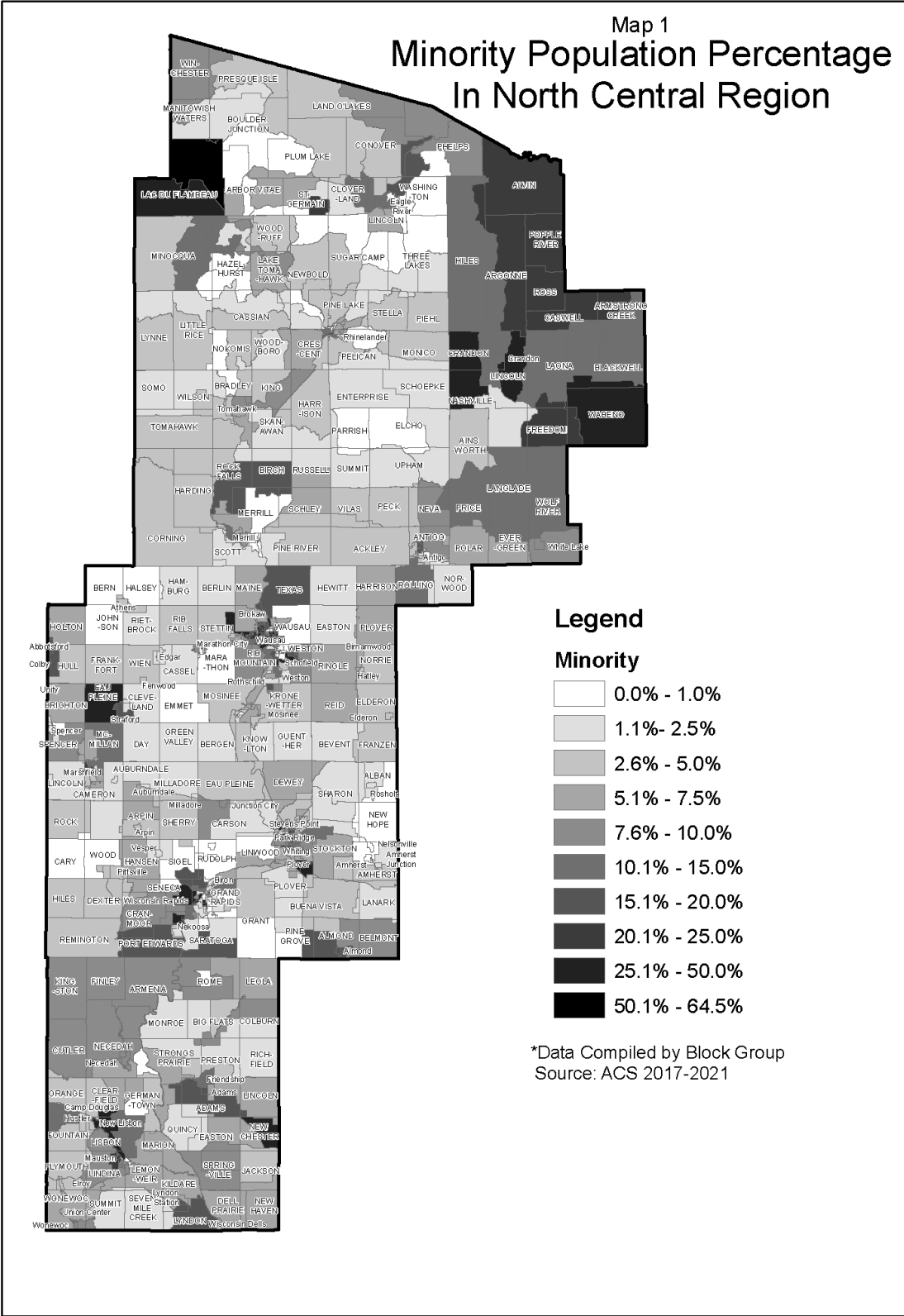


Table 3: Minority' Population for Planning Area Counties

County	Population	White Alone	Black or African American Alone	American Indian and Alaska Native alone	Asian Alone	Native Hawaiian and Other Pacific Islander alone	Hispanic or Latino	Some Other Race
Adams	20,208	90.0%	2.6%	0.7%	0.7%	0.01%	4.14%	1.84%
Forest	9,003	77.6%	1.0%	13.8%	0.5%	0%	2.74%	4.3%
Juneau	26,603	91.3%	2.3%	0.9%	0.5%	0.02%	3.21%	1.7%
Langlade	19,167	93.5%	0.7%	0.6%	0.2%	0.01%	2.18%	2.83%
Lincoln	27,687	94.8%	0.7%	0.4%	0.3%	0.00%	1.89%	1.87%
Marathon	135,485	87.5%	0.5%	0.2%	5.4%	0.03%	2.88%	3.58%
Oneida	35,480	94.7%	0.5%	1.5%	0.4%	0.02%	1.63%	1.26%
Portage	70,822	90.8%	0.7%	0.2%	3.1%	0.01%	3.36%	1.78%
Vilas	21,923	84.7%	0.4%	9.2%	0.6%	0.06%	2.59%	2.57%
Wood	72,892	91.9%	0.8%	0.4%	2.1%	0.00%	3.19%	1.63%
<b>NC Region</b>	<b>439,270</b>	<b>90.1%</b>	<b>0.8%</b>	<b>1.2%</b>	<b>2.7%</b>	<b>0.02%</b>	<b>2.88%</b>	<b>2.41%</b>

Source: B03002 Race Alone or in Combination with One or More Other Races  
US Census Bureau; American Community Survey (ACS) 5-Year Estimates Detailed Tables (2016-2020)

Map 1  
Minority Population Percentage  
In North Central Region



ANALYSIS OF IMPACTS OF THE DISTRIBUTION OF STATE AND FEDERAL TRANSIT FUNDS

[FTA Circular 4702.1B](#), Title VI Requirements and Guidelines for Federal Transit Administration Recipients, discusses the need for MPO Title VI Plans to analyze the distribution of state and federal funds in aggregate for transportation purposes and to identify any disparate impact on the basis of race, color or natural origin.

Further, the [U.S. Department of Transportation](#) identifies three fundamental Environmental Justice principles, which need to be addressed in the planning and programming of transportation projects:

- ✓ To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations;
- ✓ To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- ✓ To prevent denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

**Table 4** illustrates the distribution of federal and state funds for transportation related planning projects by the NCWRPC.

**Table 4: Obligated and Projected Federal and State Transportation Funding - NCWRPC**

Transit Revenues <sup>1</sup>	2023	2024	2025	2026
Rural Transit Planning Grant	\$82, 156	\$82, 156	\$82, 156	\$82, 156
Regional Safe Routes to School	\$79,600	79,600	Pending	Pending

Analysis of Disparate impacts on the basis of race, color, or national origin:

Taken as a whole across NCWRPC’s ten county region the transportation services provided by the NCWRPC does not pose disproportionate or adverse impacts on minority populations. The benefits of the transportation services provided are reasonably distributed across the entire North Central Region to serve the needs of all populations in the area.

NCWRPC is not a direct recipient required to submit additional information to the Federal Transit Administration (FTA) per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).

NCWRPC self-certifies compliance with all applicable federal requirements during its annual work program development process.



## Limited-English Proficiency (LEP) Plan

### Overview

As a subrecipient of federal financial assistance, the NCWRPC is required to prepare a Limited-English Proficiency (LEP) Plan to address its responsibilities relating to the needs of individuals with limited English language skills.

This plan has been prepared in accordance with [Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq](#), and its implementing regulations which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

[Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,”](#) issued in 2000 clarified Title VI of the Civil Rights Act of 1964. It stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI in order to access public services or benefits for which they are eligible. While most individuals in Wisconsin 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 (LEP).

The US DOT [“Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons”](#) discusses the concept of “safe harbor” with respect to the requirements for translation of written materials. The *Safe Harbor Threshold* is calculated by dividing the county population estimate for a language group that “Speaks English less than very well” by the total population of the county. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the NCWRPC must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for the non-English users.

Recipients of federal financial assistance are also required to implement LEP plans in accordance with guidelines of the federal agency from which the funds are provided. The Federal Transit Administration (FTA) published [FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients](#), provides guidance and instructions for carrying out US DOT FTA Title VI regulations.

### Plan Summary

The NCWRPC has developed this *Limited-English Proficiency Plan* to identify reasonable steps for providing language assistance to persons with limited-English proficiency (LEP) who wish to access services provided by the NCWRPC. This plan outlines how to identify a person who may need language assistance, how to notify LEP persons language assistance is available, the ways in which assistance may be provided, and staff training.

### Plan Components

As a recipient of federal US DOT funding, NCWRPC is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.



This plan includes the following elements:

- The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- A description of services, monitoring, and training:
  - How language assistance services are provided.
  - How LEP persons are informed of the availability of language assistance services.
  - How the language assistance plan is monitored and updated.
  - How employees are trained to provide language assistance to LEP persons.

**FOUR-FACTOR ANALYSIS**

To prepare this plan, the NCWRPC conducted a four-factor analysis which considers:

- **Demography** of LEP persons who may be served or are likely to encounter an NCWRPC program or service.
- **Frequency** of contact with LEP persons
- **Importance** of program to LEP persons
- **Resources and costs** to provide LEP assistance

**FACTOR 1 – DEMOGRAPHY: NUMBER AND PROPORTION OF LEP PERSONS WHO MAY BE SERVED OR ARE LIKELY TO ENCOUNTER AN NCWRPC PROGRAM OR SERVICE.**

Data were obtained using Census table S1601 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over by municipality and aggregated to the **NCWRPC** planning area. The data in this plan are from ACS (2017-2021) 5-year estimates.

The Safe Harbor Threshold is calculated by dividing the population estimate for the planning area for a language group that “speaks English less than very well” by the total population of persons five years and older (universe for S1601) for the planning area. 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), the NCWRPC must provide translation of vital documents in written format for non-English speaking persons.

**Table 5** shows that the limited-English proficient LEP population data for the NCWRPC planning area. In the North Central Region, with a population estimate of about 423,621, 3,136 persons are identified Asian and Pacific Island speakers that “speak English less than very well.” This language group is less than 1% but above the 1,000 persons threshold of the population of the Region. Although the Census has changed the way it reports the data for individual languages within the larger Asian and Pacific Islander group, we know from previous data analysis that the majority of the group in the Region speaks Hmong. This also applies to Spanish language group with 2,493 persons.

**Table 5: Estimate of Limited-English Proficient Persons in the NCWRPC Planning Area**

Attribute	Estimate	% Estimate
Planning Area Population <sup>1</sup>	423,621	-----
Limited-English Proficient (LEP) <sup>2</sup>	6,945	1.64
Asian & Pacific Island language speakers (primarily Hmong)	3,136	0.74
Spanish language speakers	2,493	0.59

<sup>1</sup> Population 5 years and over.  
<sup>2</sup> Speaks English less than very well.  
 Source: S1601 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, 2017-2021 ACS 5-year estimates, [U.S. Census Bureau](#).





To respond to the needs of LEP Hmong and Spanish speakers, NCWRPC will work to have its-vital documents (Notice of Nondiscrimination, Complaint Procedure, and Complaint Form) translated into these languages.

All other language groups are below the Safe Harbor Threshold. This means, at this time, NCWRPC is not required to provide written translation of vital documents in other languages.

Within the Region, the threshold of Hmong and Spanish are not changing significantly in size or geographic range. The Hmong LEP population has increased slightly since the last LEP Plan from 2,591 while the Spanish LEP group decreased slightly from 2,564.

**FACTOR 2 – FREQUENCY OF CONTACT WITH LEP PERSONS.**

NCWRPC staff reviewed the frequency with which the NCWRPC Policy Board, staff, and contractors have or could have contact with LEP persons. This includes documenting phone inquiries or office visits.

Since approval of the 2020 LEP Plan, the NCWRPC has had no requests for interpreters and no requests for translated program documents. The NCWRPC Policy Board, NCWRPC staff, and NCWRPC contactors have had no known contact with LEP persons.

NCWRPC staff have been trained to track the number of LEP encounters using the LEP Tools in **Tables 6** and **7** and shown in **Appendix D** and considers adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the NCWRPC’s programs and services.

Table 6 is an example of the *Log of LEP Encounters* that is used to record LEP encounters when/if they occur.

**Table 6: Log of LEP Encounters and Language Translation Requests**

Date	Time	Language Spoken by Individual	Name/Phone Number of Individual	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

If ever a language barrier were to exist, NCWRPC would work to provide a reasonable accommodation. The “*I Speak*” *Language Identification Card* is a document is a tool used by NCWRPC staff to assist LEP individuals. The “*I Speak*” *Language Identification Card*<sup>1</sup> illustrated in Table 7 includes languages spoken in the NCWRPC planning area as identified by U.S. Census data. Languages can be added or removed to match the demographics of the NCWRPC’s service area.

<sup>1</sup> For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>.



Table 7: "I Speak" Language Identification Card

Mark this box if you speak....	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Chinese Simplified
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

### FACTOR 3 – IMPORTANCE OF PROGRAM TO LEP PERSONS.

NCWRPC staff are most likely to encounter LEP individuals through the transportation planning process and public meetings. Understanding that an LEP person with a language barrier can face difficulties accessing essential services, the NCWRPC has committed to ensuring that all segments of the population, including LEP persons, can participate in the transportation planning process.

With improving outreach activities, the Policy Board, NCWRPC staff, and NCWRPC contractors are working to increase contact with LEP individuals at public meetings and other general public involvement activities. For example, the NCWRPC seeks out contact with community organizations that serve LEP persons such as the [Hmong American Center Inc](#), [Mutlicultural Community Center](#) and [Wisconsin Institute for Public Policy and Service](#) as well as with LEP persons themselves to obtain feedback on the types of services that best meet the needs of the LEP populations.

### FACTOR 4 – RESOURCES AND COSTS TO PROVIDE LEP ASSISTANCE

Given the small size of LEP encounters and small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request.

When requests for language translation services occur, NCWRPC will reach out to its community partners such as the [Hmong American Center Inc](#), [Mutlicultural Community Center](#) and [Wisconsin Institute for Public Policy and Service](#) for assistance.



## DESCRIPTION OF SERVICES, MONITORING, AND TRAINING

### LANGUAGE ASSISTANCE SERVICES

If a person does not speak English as their primary language and is LEP, that person may be entitled to language assistance with respect to NCWRPC's programs and services. Language assistance can include interpretation and/or translation from one language into another language.

NCWRPC will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

NCWRPC strives to offer the following measures:

- ✓ Post Title VI, LEP, and ADA information on the NCWRPC website.
- ✓ Post a statement on the [NCWRPC website](#) stating, "If you need special accommodation or translation into another language to view NCWRPC plans or programs, please contact [staff@ncwrpc.org](mailto:staff@ncwrpc.org) at 715-849-5510." This sentence is also translated in Spanish and Hmong.
- ✓ Provide a Translate feature on the NCWRPC website to assist Hmong and Spanish LEP individuals with access to NCWRPC website information.
- ✓ At public meetings or other community input events:
  - Greet participants as they arrive at NCWRPC sponsored events.
  - Make "I Speak" language identification cards available at sponsored events. By informally engaging participants in conversation or by using language identification "I Speak" Language identification Card, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need at future events.
  - Maintain a Log of LEP Encounters at public meetings or other community events.
  - Once NCWRPC develops a mechanism to provide translation services, NCWRPC will include the following statement on public meeting notices: "Language interpretation or translation services are available with advance notice of XX calendar days." Note: Timeframe for advance notice is to be determined.
- ✓ Maintain a *Log of LEP Encounters* to capture information on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
  - Survey NCWRPC staff periodically on their experience concerning contacts with LEP persons during the previous year.
- ✓ Translation Services
  - Seek translation assistance from community organizations such as:
    - [Hmong American Center Inc](#) – (715)842-8390
    - [Multicultural Community Center](#) – (715)907-7082, [wausauinfo@eccdcus.org](mailto:wausauinfo@eccdcus.org)
    - [Wisconsin Institute for Public Policy and Service](#) – Hmong Team Coordinator (715)204-9250, Hispanic Team Coordinator (715)204-9396, [h2n.chw@gmail.com](mailto:h2n.chw@gmail.com)
  - Consider establishing a contract with a vendor to provide translation services (written and oral).
  - Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon request, within a reasonable time frame.



- The NCWRPC plans to work with its local government partners to assist in this effort.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <https://wisconsinrelay.com>.
- ✓ Prioritize the hiring of bilingual staff, as needed.

### Informing LEP Persons of Language Assistance Services

NCWRPC uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts a statement on the [NCWRPC website](#) stating, “If you need special accommodation or translation into another language to view NCWRPC plans or programs, please contact [staff@ncwrpc.org](mailto:staff@ncwrpc.org) or 715-849-5510. This sentence is also translated in Spanish and Hmong.
- ✓ Posts the Title VI/LEP *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact the NCWRPC to request information in another language.
- ✓ Includes a Translate feature on the NCWRPC website to assist Hmong and Spanish LEP individuals with access to the NCWRPC website information.
- ✓ When encountering LEP persons directly, as needed NCWRPC staff will use the “*I Speak*” *Language Identification Card* to identify the language and communication need of LEP persons. The NCWRPC may not be able to immediately accommodate or assist individuals self-identifying as a person not proficient in English but will seek means to follow up with the individual to address their needs in the language requested as soon as possible.
- ✓ Reviews outreach activities and information gathered from the *Log of LEP Encounters* on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Develops and maintains cooperative relationships with key agencies/community organizations that serve LEP populations in the area or region. These entities can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs.
- ✓ Utilizes translation services such as seeking out language assistance from community organizations or Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <https://wisconsinrelay.com>.
  - Additional community organizations include
    - [Hmong American Center Inc](#) – (715)842-8390
    - [Multicultural Community Center](mailto:wausauinfo@eccdcus.org) – (715)907-7082, [wausauinfo@eccdcus.org](mailto:wausauinfo@eccdcus.org)
    - [Wisconsin Institute for Public Policy and Service](#) – Hmong Team Coordinator (715)204-9250, Hispanic Team Coordinator (715)204-9396, [h2n.chw@gmail.com](mailto:h2n.chw@gmail.com)



## MONITORING, EVALUATING AND UPDATING THE LEP PLAN

NCWRPC will review the LEP Plan on an annual basis. Review and updates will include the following:

- ✓ The number of documented LEP person contacts.
- ✓ How the needs of LEP persons have been addressed.
- ✓ Determine whether the need for translation services has changed.
- ✓ Determine with existing language assistance services are effective and sufficient to meet the needs of LEP persons.
- ✓ Determine whether complaints have been received concerning the NCWRPC's failure to meet the needs of LEP individuals.
- ✓ Sufficiency of staff training.
- ✓ Review of any new opportunities for LEP communication.
- ✓ Determine whether financial resources are needed to fund language assistance services.

## TRAINING STAFF

The following training will be provided to NCWRPC staff:

- ✓ Information on the NCWRPC's Title VI/Nondiscrimination Plan and LEP responsibilities.
- ✓ Description of language assistance services offered to the public.
- ✓ Use of the "I-Speak Card" as a tool to assist LEP individuals (**Appendix D**) at the office and at public outreach events.
- ✓ Documentation of language assistance requests using the *Log of LEP Encounters*.
- ✓ How to handle potential Title VI/Nondiscrimination and LEP complaints.

## DISSEMINATION OF LEP PLAN

NCWRPC staff will make good faith efforts to notify the public that a LEP Plan and language assistance is available by:

- Posting notices in English, Spanish, and Hmong on the NCWRPC website.
- Posting the Plan to the NCWRPC website.
- Emailing our Public Notice List that the *Title VI Non-Discrimination Program and Limited-English Proficiency Plan* is available. The email includes statements for assistance in English, Spanish, and Hmong.

The *Title VI Non-Discrimination Program and Limited-English Proficiency Plan* is currently only available online as a PDF. Staff will work to provide the LEP Plan as HTML so that LEP persons can access the Plan using the Translate tool included in our website.





## Appendix A: Title VI Approvals and Administration

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### Resolution Approving Title VI Plan

**NORTH CENTRAL WISCONSIN REGIONAL PLANNING COMMISSION  
RESOLUTION 2023 - 3**

**ADOPTION OF TITLE VI NON-DISCRIMINATION PROGRAM  
AND LIMITED ENGLISH PROFICIENCY PLAN**

WHEREAS, the Fixing America's Surface Transportation (FAST) Act signed into law in 2015 is codified in Title 23 Part 450 of the Code of Federal Regulations (23 CFR 450) and in 49 CFR 613. Section 450.316, Interested Parties, Participation, and Consultation, requires MPOs to develop a participation plan in consultation with all interested parties; and

WHEREAS, the United States Department of Transportation regulations require the NCWRPC to establish and maintain a Title VI Program to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate into its programs and activities considerations expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons (70 FR 74087, December 14, 2005); and

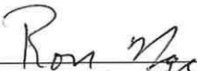
WHEREAS, the NCWRPC intends that no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any NCWRPC program or activity, regardless of funding source; and

WHEREAS, the NCWRPC will affirmatively ensure that in any contract entered into, Disadvantaged Business Enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award; and

NOW, THEREFORE, BE IT FURTHER RESOLVED: that the NCWRPC approves the Title VI Non-Discrimination Program and Limited-English Proficiency Plan as being consistent with regional plans and policies.

Adopted this 25th day of October 2023.

  
\_\_\_\_\_  
Paul Millan, Chairperson

  
\_\_\_\_\_  
Ron Nye, Secretary - Treasurer



## Log of Policy Updates

NCWRPC will review its policy on an annual basis to determine if modifications are necessary. **Table 8** is current as of this approval and will be used to record future updates.

**Table 8: Log of Policy Updates**

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
07/30/14	Creation / Adoption	Darryl Landeau, Transportation Planner	Initial Plan
12/05/16	Review	Darryl Landeau, Transportation Planner	Assurances
07/26/17	Update / Adoption	Darryl Landeau, Transportation Planner	3-year Update
11/16/17	Review	Darryl Landeau, Transportation Planner	Assurances
11/01/18	Review	Darryl Landeau, Transportation Planner	Assurances
10/30/19	Review	Darryl Landeau, Transportation Planner	Work Program
07/22/20	Update / Adoption	Darryl Landeau, Transportation Planner	3-year Update
09/17/21	Review	Darryl Landeau Transportation Planner	Assurances
09/15/22	Review	Darryl Landeau Transportation Planner	Assurances
10/25/23	Update / Adoption	Darryl Landeau Transportation Planner	3-year Update

## Contact Information and Program Administration

### NCWRPC Title VI/ADA Coordinator

Dennis Lawrence  
210 McClellan Street, Suite 210, Wausau, WI 54403  
715-849-5510, Ext 304  
[dlawrence@ncwrpc.org](mailto:dlawrence@ncwrpc.org)

### NCWRPC Title VI / ADA Tus Kws Lis Haujlwm

Dennis Lawrence  
210 McClellan Street, Suite 210, Wausau, WI 54403  
715-849-5510, Ext 304  
[dlawrence@ncwrpc.org](mailto:dlawrence@ncwrpc.org)

### Coordinador de Título VI / ADA de NCWRPC

Dennis Lawrence  
210 McClellan Street, Suite 210, Wausau, WI 54403  
715-849-5510, Ext 304  
[dlawrence@ncwrpc.org](mailto:dlawrence@ncwrpc.org)





## Appendix B: Title VI/Nondiscrimination Assurances

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### Policy Statement and Authorities

#### **Title VI Policy Statement**

NCWRPC, a WisDOT Subrecipient of FHWA funds, (hereinafter referred to as the “Subrecipient”) assures that no person shall, on the grounds of race, color, national origin, disability, age, limited English proficient, low-income status, or sex as provided by Title VI of the Civil Rights Act of 1964, Section 162 (a) of the Federal Aid Highway Act of 1973 (23 U.S.C. 324), 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 program or activity. The Subrecipient further assures every effort will be made to ensure non-discrimination in whether those programs and activities are federally funded or not.

In other words, this organization has implemented procedures, policies, and actions to ensure nondiscrimination in all of its programs and activities; and offers the signature of its highest official as a reasonable guarantee of compliance with all nondiscrimination laws and requirements.

#### **Authorities**

The above Title VI Policy Statement and the following provisions of these **Assurances** are provided under a range of federal Acts and Regulations [see 23 CFR 200.5(p)]. References to Title VI requirements and regulations are not solely limited Title VI of the Civil Rights Act of 1964. Where appropriate, “Title VI requirements” also refer to the civil rights provisions of other federal statutes and related implementation regulations to the extent that they prohibit discrimination on the grounds of race, color, national origin, disability, age, limited English proficient, low-income status, or sex in all its programs, activities and operations receiving federal financial assistance. The Title VI authorities include but are not limited to:

#### **Nondiscrimination Acts**

- **Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) provides:** 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.
- **Section 162 (a) of the Federal Aid Highway Act of 1973 (23 U.S.C. 324) provides:** No person shall, on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance under this Title or carried on under this Title.
- **The Civil Rights Restoration Act of 1987 (P.L. 100-209), provides:** Clarification of the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. The Act restores the broad, institution-wide scope and coverage of the nondiscrimination statutes to include all programs and activities of Federal-aid recipients, sub- recipients, and contractors/consultants, whether such programs and activities are federally assisted or not.

#### **Nondiscrimination Regulations**

- 23 CFR 200, Title VI Program and Related Statutes-Implementation and Review Procedures



- 49 CFR 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964
- [USDOT Order 1050.2A](#), *Standard Title VI/Non-Discrimination Assurances*

## Title VI Assurances

### **The United States Department of Transportation (USDOT)**

#### **Standard Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A**

NCWRPC (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through **Federal Highway Administration**, is subject to and will comply with the following:

#### **Statutory/Regulatory Authorities**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Non-discrimination in Federally-Assisted Programs Of The Department Of Transportation—Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice *Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964*);

**Federal Highway Administration may include additional Statutory/Regulatory Authorities here.**

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

#### **General Assurances**

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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," for which the Recipient receives Federal financial assistance from DOT, including the (**Federal Highway Administration**).

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.



**Federal Highway Administration may include additional General Assurances in this section or reference an addendum here.**

### **Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted *MPO Planning Program*:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in 21.23 (b) and 21.23(e) of 49 C.F.R. 21 will be (with regard to an "activity") facilitated or will be (with regard to a "facility") operated or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Long-Range Transportation Planning, Short-Range Multimodal Planning, and Transportation Improvement Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The NCWRPC in accordance with the provisions of **Title VI of the Civil Rights Act of 1964** (78 Stat. 252, 42 U.S.C. 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."
3. The Recipient will insert the clauses of Appendix A of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in



which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
  10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

***Federal Highway Administration may include additional Specific Assurances in this section.***

By signing this **ASSURANCE**, NCWRPC also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **[Wisconsin Department of Transportation's]** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **[Wisconsin Department of Transportation]**. You must keep records, reports, and submit the material for review upon request to **[Wisconsin Department of Transportation]**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

NCWRPC gives this **ASSURANCE** in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Long-Range Transportation Planning, Short-Range Multimodal Planning, and Transportation Improvement Program. This ASSURANCE is binding on **[Wisconsin]**, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Long-Range Transportation Planning, Short-Range Multimodal Planning, and Transportation Improvement Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

**NCWRPC**

**By**

***Dennis Lawrence, Executive Director***

**DATED: October 25, 2023**



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## Appendix C: Protections Under Title VI

### Public Notice of Non-Discrimination

#### Notice of Nondiscrimination

##### North Central Wisconsin Regional Planning Commission (NCWRPC)

- ✓ **NCWRPC** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the **NCWRPC** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the **NCWRPC**.
- ✓ For more information on the **NCWRPC's** civil rights program, and the procedures to file a complaint, contact 715-849-5510 (for hearing impaired, please use Wisconsin Relay 711 service), email staff at [staff@ncwrpc.org](mailto:staff@ncwrpc.org) or visit our administrative office at 210 McClellan Street, Suite 210, Wausau, WI 54403. For more information, visit <https://www.ncwrpc.org/>
- ✓ A complaint may also be filed directly with any of the following:
  - Wisconsin Department of Transportation (WisDOT), Taqwanya Smith, Senior Title VI and ADA Coordinator, Phone: (608) 266-8129, TTY (800) 947-3529, Fax: (608)267-3641, Email: [taqwanya.smith@dot.wi.gov](mailto:taqwanya.smith@dot.wi.gov), 4822 Madison Yards Way, 5<sup>th</sup> Floor South, Madison, WI 535705. For more information, visit the [WisDOT Title VI-ADA website](#).
  - U.S. Department of Transportation, Federal Highway Administration (FHWA), Office of Civil Rights. 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590, Phone: (202) 366-0693, email: [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov)
  - U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: 1-888-446-4511 or 711(Relay), email: [FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)
- ✓ If information is needed in another language, contact 715-849-5510.  
Si se necesita informacion en otro idioma de contacto, 715-849-5510.  
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 715-849-5510.



## Complaint Procedure

NCWRPC's Complaint Procedure is made available in the following locations:

- NCWRPC website – <https://www.ncwrpc.org/>
- NCWRPC office (see Executive Director)

If information is needed in another language, contact 715-849-5510.

Si se necesita informacion en otro idioma de contacto, 715-849-5510.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 715-849-5510.

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### **Overview**

**NCWRPC** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by **NCWRPC** in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

### **Right to File Complaints**

**NCWRPC** uses the following procedures for prompt processing of all civil rights complaints relating to any program, activity or service administered by **NCWRPC** or its contractors, consultants, lessors receiving Federal financial assistance. These procedures do not deny the right of the Complainant to file formal complaints with other state or federal agencies or seek private counsel for complaints alleging discrimination.

Any individual, group of individuals, or entity that believes they have been subjected to discrimination or retaliation prohibited by Title VI nondiscrimination provisions by **NCWRPC** may file a complaint with the following:

1. Dennis Lawrence, **NCWRPC** Title VI Coordinator at 715-849-5510 (for hearing impaired, please use Wisconsin Relay 711 service - <https://wisconsinrelay.com>; email [staff@ncwrpc.org](mailto:staff@ncwrpc.org) or visit our administrative office at 210 McClellan Street, Ste 210, Wausau, WI 54403.
2. Wisconsin Department of Transportation (WisDOT), Taqwanya Smith, Senior Title VI and ADA Coordinator, Phone: (608) 266-8129, TTY (800) 947-3529, Fax: (608)267-3641, Email: [taqwanya.smith@dot.wi.gov](mailto:taqwanya.smith@dot.wi.gov), 4822 Madison Yards Way, 5<sup>th</sup> Floor South, Madison, WI 535705. For more information, visit the [WisDOT Title VI-ADA website](#).
3. U.S. Department of Transportation, Federal Highway Administration (FHWA), Office of Civil Rights. 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590, Phone: (202) 366-0693, email: [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov)
4. U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: 1-888-446-4511 or 711(Relay), email: [FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)

### **Procedures**

Any person who believes they've been discriminated against by **NCWRPC** may file a complaint by completing and submitting **NCWRPC's** Complaint Form.





This civil rights complaint procedure may also be used by the NCWRPC to address, resolve, and close general complaints.

Every effort will be made to obtain early resolution of complaints at the lowest possible level. The option of informal mediation meeting(s) between the affected parties and NCWRPC Title VI Coordinator may be utilized for resolution, at any stage of the process. NCWRPC Title VI Coordinator will make every effort to pursue a resolution of the complaint.

Complaints can be submitted to NCWRPC in writing via email or by phone. Complainants are encouraged to complete the Complaint Form **Appendix C**. Complaints received by telephone will be reduced to writing and provided to the Complainant for confirmation or revision before processing.

Complaints should contain the following information:

- ✓ The Complainant's contact information, including, if available: full name, postal address, phone number, and email address.
- ✓ The basis of the complaint (e.g., race, color, national origin, disability, etc.).
- ✓ The dates of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.
- ✓ The names of specific persons or respondents (e.g., agencies/organizations) alleged to have discriminated.
- ✓ Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives federal financial assistance.

Complaints received will be acknowledged and processed, once the Complainant's intent to proceed with the complaint has been established.

### **Investigation of Complaints**

Complaints in which NCWRPC is named as the Respondent (i.e., the recipient/entity which a complaint of discrimination has been filed) shall be forwarded to the appropriate State or Federal agency for proper disposition, in accordance with their procedures.

NCWRPC will assume responsibility for investigating complaints against any of its contractors, consultants, lessors, etc.

To be accepted, a civil rights complaint must meet the following criteria:

1. The complaint should be filed within **180** calendar days of the alleged occurrence or when the alleged discrimination became known to the Complainant.
2. The allegation(s) should address a nondiscrimination protection such as race, color, national origin, disability, etc.
3. The allegation(s) must involve a program or activity of a federal-aid recipient, contractor, consultant, or lessor.

NCWRPC reviews and determines the appropriate action regarding every complaint.

When a complaint is received, NCWRPC will provide written acknowledgment to the Complainant within 15 business days. The Complainant is notified of the proposed action to be taken to process the allegation(s). The notification letter/email shall contain:

- ✓ The basis for the complaint.
- ✓ A brief statement of the allegation(s) over which the NCWRPC has jurisdiction.
- ✓ An indication of when the parties will be contacted.



The investigation conducted by NCWRPC consists of a personal interview with the Complainant(s). Information gathered in this interview includes but is not limited to information completed on the Complaint Form.

If more information is needed to address the complaint, NCWRPC may contact the Complainant. If a complaint is deemed incomplete or if additional information is requested, the Complainant will be provided 10 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within 90 business days of the acceptance of the complaint, NCWRPC will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendation for disposition. Only reasonably qualified and trained investigators should conduct the investigation.

After NCWRPC reviews the complaint, one of two (2) letters will be issued to the Complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states there was not a civil rights 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, the Complainant has **10** business days after the date of the letter of finding to do so.

### **Dismissal**

A civil rights complaint may be recommended for dismissal for the following reasons:

1. The Complainant requests withdrawal of the complaint.
2. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
3. The Complainant cannot be located after reasonable attempts.

### **List of Complaints**

NCWRPC maintains a Complaint Log as shown in outlining the list of complaints, investigations and lawsuits alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status of the complaint, investigation, or lawsuit, actions taken by NCWRPC in response, and final findings related to the complaint, investigation, or lawsuit.

NCWRPC will submit a log of all Title VI complaints received, and any additional pertinent records to the WisDOT, Title VI Office, as requested.

For more information, contact:

NCWRPC, Title VI Coordinator

Dennis Lawrence

[staff@ncwrpc.org](mailto:staff@ncwrpc.org)

715-849-5510



## Complaint and Comment Form

We want your feedback. If you would like to submit a comment or complaint to MPO/RPC, please complete this form and submit via e-mail at [staff@ncwrpc.org](mailto:staff@ncwrpc.org), mail or in person at the address below.

### NCWRPC

210 McClellan Street, Suite 210  
Wausau, WI 54403

You may also call us at 715-849-5510. Please make sure to provide your contact information in order to receive a response.

### Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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Click or tap here to enter text.

### Section B: Contact Information

Name <input type="text"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>
Email Address <input type="text"/>	

Are you filing this complaint on your own behalf?

Yes

No

If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

Click or tap here to enter text.

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 C: Type of Comment

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

### Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> Bus
---------------------------------------------------------------------------------------------------------	--------------------------------------	----------------------------------------------	------------------------------

What was the date of the occurrence?	Click to add date in the following format: Day, month, year
--------------------------------------	-------------------------------------------------------------

What was the time of the occurrence?	Click to add the time
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What is the name or identification of the employee or employees involved?	Click or tap here to enter text.
---------------------------------------------------------------------------	----------------------------------

What is the name or identification of others involved, if applicable?	Click or tap here to enter text.
-----------------------------------------------------------------------	----------------------------------

What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.
----------------------------------------------------------------------	----------------------------------

What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.
-----------------------------------------------------------------------------------------------------	----------------------------------

Where was the location of the occurrence?	Click or tap here to enter text.
-------------------------------------------	----------------------------------

Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---------------------------------------------------------	------------------------------	-----------------------------

Please add any additional descriptive details about the incident.	Click or tap here to enter text.
-------------------------------------------------------------------	----------------------------------

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.



### Section E: Follow-up

May we contact you if we need more details or information?

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

### Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

If applicable, please list low all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

### Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the NCWRPC.

Name

**Date:** Click to add date in the following format: Day, month, year

Signature



## Complaint Log

**NCWRPC** maintains a list or log to track and resolve all complaints, investigations, and lawsuits.

**Check One:**

<b>X</b>	Because the <b>NCWRPC</b> has had no Title VI-related filings against it, the log of complaints, investigations, and lawsuits illustrated in Table 8 has no entries.
	There have been investigations, complaints and/or lawsuits filed against us. <i>See list below. Attach additional information as needed.</i>

**Note:** The performance measure for tracking when an investigation begins and when its administratively closed is documented in the **Complaint Log** table below. **NCWRPC** will strive to complete the investigation within the timeframe specified in its **Complaint Procedure**.

**Table 9: Log of Complaints, Investigations, and Lawsuits.**

Type Complaint Investigation Lawsuit	Date Complaint Received (Month, Day, Year)	Complainant’s Contact Information Name/Phone/ Email/Address	Basis of Complaint <sup>2</sup>	Summary Complaint Description	Action Taken/ Final Outcome if Resolved List dates of action steps including the dates complaint/ investigation begins and is administratively closed.	Status

<sup>1</sup> Complaint, Investigation, or Lawsuit. The protected classes under Title VI are Race, Color and Nation Origin; the protected class under Title II is disability.

<sup>2</sup> Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other.



## Appendix D: Limited English Proficient (LEP) Tools

### “I Speak” Language Identification Card

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Chinese Simplified
	E nói tiếng Việt	Vietnamese
	나는 한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	o magsalita ng Tagalog	Tagalog
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

### Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes



## Language Translation Request Log

<b>Date</b>	<b>Language Spoken By Individual</b> <i>(if available)</i>	<b>Name and Phone Number of Individual</b> <i>(if available)</i>	<b>Service Requested</b>	<b>Follow Up Actions</b> <i>(Was Translation Services Provided?)</i>	<b>Staff Member Providing Assistance</b>	<b>Notes</b>





## Appendix E: Vital Documents for Hmong Speakers

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Notice of Nondiscrimination

Complaint Procedure

Complaint Form

**This section is under construction.**



## Appendix F: Vital Documents for Spanish Speakers

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Notice of Nondiscrimination

Complaint Procedure

Complaint Form

**This section is under construction.**

