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

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This SLATS *Title VI Non-Discrimination Program and Limited-English Proficiency (LEP) Plan* and other SLATS documents, meeting minutes and agendas, and other information may also be obtained on our website at www.beloitwi.gov

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Yog hais tias cov lus qhia uas yuav tsum tau nyob rau hauv lwm hom lus, hu rau (608)364-6711.

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Title VI Non-Discrimination Program

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.

SLATS, 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); 49 CFR Part 21; and related statutes and regulations. SLATS acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

This plan explains the how SLATS incorporates the requirements of Title VI and related legal authorities into its operations. The plan will be used a reference for SLATS 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 SLATS. 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.

The Director of Planning and Building Services is responsible for ensuring the implementation of the SLATS overall Title VI Non-Discrimination Program.

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Title VI Non-Discrimination Responsibilities

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

- ✓ Program Administration
 - Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements

- Develop and implement the SLATS 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 SLATS Nondiscrimination requirements via the SLATS office and website.
- ✓ Oversight
 - Ensure contractors and lessees adhere to Title VI/Nondiscrimination and LEP requirements

Content of Title VI Program

SLATS, as a subrecipient of FTA/FHWA funds, must submit to the Wisconsin and Illinois Departments of Transportation, which are the primary recipients of transit/PL 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 **SLATS** are as follows:

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

A. PROVIDING TITLE VI ASSURANCES

SLATS Title VI Assurances are included with this program in [Appendix B](#).

B. PREPARING AND SUBMITTING A TITLE VI PROGRAM

The following is a list of required contents of the Title VI Nondiscrimination Program and where the information can be found.

- Evidence of [Policy Approval](#) and [Log of Policy Updates](#) ([Appendix A](#))
- [Contact Information/Program Administration](#) ([Appendix A](#))
- [Public Notice of Nondiscrimination](#) ([Appendix C](#))
- [Discrimination Complaint Procedure](#) and [Complaint Form](#) ([Appendix C](#))
- Complaint Log ([Appendix C](#))
- [Public Participation Plan](#)
- [Demographic Representation](#) on planning and advisory bodies
- [Demographic maps and Analysis of Impacts](#)
- [Limited-English Proficiency \(LEP\) Plan and LEP Tools](#) ([Appendix F](#))
- Translated Vital Documents in Spanish ([Appendix D](#))

C. NOTIFYING BENEFICIARIES OF PROTECTION UNDER TITLE VI

[FTA Title VI Circular 4702.1B](#) requires SLATS 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 SLATS 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 and public area(s) of the agency office.

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.

The SLATS *Notice of Nondiscrimination* is provided in the following locations:

- Agency website www.beloitwi.gov
- Agency office Beloit City Hall, 100 State Street, Beloit, WI 53511

In English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish to contact SLATS at (608)364-6702 if additional information is needed in another language.

To view a copy of the SLATS *Notice of Nondiscrimination*, please see [Appendix C](#).

The SLATS *Notice of Nondiscrimination* is translated in Spanish and is included in [Appendix D](#).

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

SLATS, 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 SLATS may file a civil rights complaint.

The scope of civil rights complaints covers all internal and external SLATS 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 SLATS 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.

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

- Agency website www.beloitwi.gov
- Agency office Beloit City Hall, 100 State Street, Beloit, WI 53511

The SLATS *Complaint Procedure* and *Complaint Form* are translated in Spanish and are included in [Appendix D](#).

E. 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 the SLATS 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 SLATS.

F. 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.

SLATS pursues meaningful and continued public participation in the three categories of transportation planning listed below in order to determine the region's transportation vision and future goals.

- Implementing policy (e.g., Public Involvement Plan (PIP))
- Developing and amending plans and programs (e.g., Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP))
- Conducting general transportation plans and studies (e.g., corridor studies, modal plans such as the Transit Development Plan and bike and pedestrian plan)

SLATS maintains and conducts its planning activities in accordance with the PIP, available on the SLATS website. The SLATS Title VI Program is integrated into the PIP by reference.

For more information on SLATS' public involvement outreach techniques see 'Procedures for the Planning Process' in the Demographic Profile, Procedures, and Impact Section.

G. DEMOGRAPHIC REPRESENTATION ON PLANNING AND ADVISORY BODIES

SLATS 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 SLATS Policy Board is comprised of local agency elected officials or local agency appointed officials, and the SLATS Technical Advisory Committee is comprised of local agency appointed representatives. Membership of neither the SLATS Policy Board nor Technical Advisory Committee is selected or determined by SLATS. If SLATS had a non-elected board or committee in which membership is selected by SLATS, Title VI regulations require SLATS to provide a table depicting the membership of those committees broken down by race.

Because SLATS is governed by a Policy Board consisting of elected officials or designees of its member agencies, and representation is not determined by SLATS, minority representation is not ascertained. The Policy Board is advised on all matters by a standing Technical Advisory Committee (TAC) consisting of transportation officials from the member agencies. Although member agencies determine their representation on the TAC, the Policy Board appoints and directs the TAC.

SLATS understands diverse representation on committees, and boards can result in policy reflective of its entire population. As vacancies on such committees become available, SLATS would encourage appointing authorities to make efforts to promote diversity, and would encourage participation of all citizens should the opportunity to join a committee arise.

Nonetheless, the public is invited to attend any of the Policy Board and TAC meetings. SLATS staff encourages participation by all groups on the advisory committees by invitation to meetings, public information meetings, etc. as outlined in The SLATS Public Involvement Plan. Contacts are maintained in email distribution lists and mail address lists.

H. PROVIDING MEANINGFUL ACCESS TO LIMITED-ENGLISH PROFICIENT PERSONS

As a recipient of federal USDOT funding, SLATS 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, SLATS monitors and tracks statistical demographic data as it becomes available on race, language spoken, income level, persons with disabilities, and sex of the population of SLATS area.

DEMOGRAPHIC PROFILE

For the purposes of this analysis, minority includes all individuals who identified themselves as a race other than white and/or Hispanic or Latino (of any race). The minority percentages by planning area community are provided in Table 1. The data is based on total community populations that may include populations outside of the SLATS Adjusted Urban Area (AUA) as with Rockton Township, and does not include smaller geographies that have smaller populations within the AUA such as Town of Rock, Village of Roscoe and Roscoe Township. Additional updates are anticipated the MPO Urban Area (UA), Adjusted Urban Area (AUA) and MPA boundaries are finalized in 2024.

Table 1: Ethnic and Racial Composition of SLATS Communities within the Planning Area - 2020

PLACE	TOTAL POPULATION BY PLACE	% BY PLACE	TOTAL MINORITY POPULATION BY PLACE (INCLUDES HISPANIC OR LATINO POPULATION)	% BY PLACE	HISPANIC OR LATINO POPULATION (FROM THE TOTAL - ALL RACES)	% BY PLACE	NON-HISPANIC POPULATION BY RACE													
							WHITE	% BY PLACE	BLACK OR AFRICAN AMERICAN	% BY PLACE	AMERICAN INDIAN OR ALASKAN NATIVE	% BY PLACE	ASIAN	% BY PLACE	NATIVE HAWAIIAN OR PACIFIC ISLANDER	% BY PLACE	SOME OTHER RACE	% BY PLACE	TWO OR MORE RACES	% BY PLACE
CITY OF BELOIT	36,657	55.3%	16,019	43.7%	7,812	21.3%	20,638	56.3%	5,169	14.1%	109	0.3%	587	1.6%	21	0.1%	211	0.6%	2,110	5.8%
TOWN OF BELOIT	7,721	11.6%	1,608	20.8%	750	9.7%	6,113	79.2%	402	5.2%	28	0.4%	69	0.9%	0	0.0%	24	0.3%	335	4.3%
TOWN OF TURTLE	2,393	3.6%	284	11.9%	126	5.3%	2,109	88.1%	46	1.9%	6	0.3%	13	0.5%	2	0.1%	3	0.1%	88	3.7%
VILLAGE OF ROCKTON	7,863	11.9%	963	12.2%	370	4.7%	6,900	87.8%	97	1.2%	15	0.2%	122	1.6%	2	0.0%	16	0.2%	340	4.3%
CITY OF SOUTH BELOIT	7,989	12.0%	1,909	23.9%	918	11.5%	6,080	76.1%	340	4.3%	16	0.2%	136	1.7%	0	0.0%	30	0.4%	469	5.9%
ROCKTON TOWNSHIP	3,715	5.6%	614	16.5%	431	11.6%	3,101	83.5%	54	1.5%	6	0.2%	14	0.4%	0	0.0%	9	0.2%	100	2.7%
TOTAL	66,338		21,397.00		10,407		44,941		6,108		180		941		25		293		3,442	
PERCENT OF TOTAL	100.0%	100.0%	32.3%		15.7%		67.7%		9.2%		0.3%		1.4%		0.0%		0.4%		5.2%	

DATA SOURCE: 2020 U.S. Decennial Census - P9|Hispanic or Latino, and not Hispanic or Latino by Race

Note in the table that overall, throughout the SLATS area, Black or African American individuals comprise the largest minority race at just over 9%. That percentage jumps to a little over 14% (down from 15% in 2010) in the City of Beloit, which is slightly higher than the overall U.S. non-Hispanic or Latino Black or African American population of about 12%. The next highest single minority race in the MPA is Asian, at 1.4% (up from 1.1% in 2010). Individuals that are more than one race make up 5.2% (up from 2.5% in 2010). The majority of these individuals are White and African American.

Hispanic or Latino individuals of all races make up a significant portion of the population at 10,407 individuals (up from 8,296 in 2010), or 15.7% of the SLATS area population overall, and just over 21% (up from about 17% in 2010) of the population of the City of Beloit, or 7,812 persons. The next highest population of Hispanic or Latino individuals resides in South Beloit at 918 (up from 608 in 2010) or 11.5%. Hispanic or Latino individuals also make up about 10-12 percent of the overall populations of Rockton Township and the Town of Beloit.

Lastly, note that the overall minority population in the SLATS area (including Hispanic or Latino persons) is just over 32% (up from 25% in 2010). Individually however, with the exception of the City of Beloit, the various municipalities are less than 25% with South Beloit being the second highest at about 24%. The City of Beloit seems to mirror the national numbers with a Hispanic or Latino population of about 21% (versus about 19% nationally) and an overall minority population including Hispanic or Latino persons approaching 44% (up from 36% in 2010), which is about the same nationally. With nearly 1 in 2 individuals in the City of Beloit being a minority (and 1 in 3 in the SLATS area), SLATS will continuously strive to consider and address the mobility needs of minorities, and strive to ascertain, avoid or mitigate any disparate impacts of the transportation decisions made on minorities, and work to include minorities in those decision-making processes to further these goals.

Between 2000 and 2010, there was about a about a 7% drop in White-only population from 81.7% in 2000 to 74.8% in 2010. Similarly, between 2010 and 2020, there was about a 7% drop in White-only population from 74.8% in 2010 to 67.7% in 2020. It is anticipated that this trend will continue as the SLATS area continues to diversify. 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. Just over 5% of the population in SLATS area identified as Two or More Races, which may have inflated the average reduction in the White-only population compared to the 7% decrease from 2000 to 2010.

Table 2: Ethnic and Racial Composition of SLATS Planning Area - 2010

Entity	White alone	Black/ African American alone	American Indian/Alaska Native alone	Asian alone	Native Hawaiian/other Pacific Islander alone	Other /2 or more races alone	Hispanic or Latino of any race
SLATS MPA	74.8%	9.4%	0.2%	1.1%	0%	2.5%	12.0%

DATA SOURCE: U.S. Census – American FactFinder Tables QT-P4 Race, Combination of Two Races, and Not Hispanic or Latino: 2010 SF1 100% by Block

SLATS area transportation projects involving federal funds are mapped along with minority and low-income population areas in the SLATS TIP. These maps and projects are updated annually, as is new demographic data as they become available.

Minimizing Negative Impacts

To minimize the negative impacts of transportation projects, planners and engineers should consider potential impacts throughout project planning and development, and involve the public early in the planning process to help identify potential negative impacts and alternatives or mitigation strategies. The goal is not just to move traffic efficiently and safely, but to do so without causing adverse effects. This is especially important in EJ neighborhoods. It is the common practice of SLATS to evaluate all projects programmed in the TIP from the standpoint of discrimination and to identify any disparate impacts on minority or low income (EJ) populations.

SLATS will continue this approach and continually seek ways to improve this process and analysis. If projects result in a disparate impact on EJ populations, alternatives will be explored.

As a small MPO with limited resources, most state and federally funded projects have community significance as opposed to benefiting or negatively impacting one neighborhood or area over another. Federally funded road improvements throughout the MPO are generally major collector or arterial in function, or include other modes of transportation such as transit or bicycle and pedestrian facilities, and so the benefit and impacts are generally not localized, rather they are community-wide or regional. Residents and businesses along a particular project such as a road reconstruction project may have short-term inconvenience that requires active and appropriate mitigation and coordination, but the long-term benefits typically outweigh the short-term inconvenience with improved safety, access, pavement conditions, traffic management, and potentially additional access modes (sidewalks, bicycle improvements, transit routes and stops), parking and additional amenities. Also, transportation improvements often bring new commerce and private investment to a neighborhood, and can provide better access that will benefit the neighborhood.

When transportation improvements are less regional and more localized, it is important that low income and minority neighborhoods are provided a fair proportion of beneficial transportation improvements as opposed to concentrating transportation improvements in non-EJ neighborhoods. A balanced transportation plan and improvement program strives to increase opportunities for safe and efficient travel in all parts of the community, regardless of race, ethnicity, or income levels, particularly with regard to alternative forms of transportation. If EJ populations lack access to an automobile, there is a greater need for public transit, sidewalks, bikeways and of course safe, pedestrian friendly streets and intersections.

To avoid undue adverse impacts on EJ populations the following factors are considered:

- It is a fair assumption that any project with an element of expansion is likely to have a greater effect on nearby residents or businesses than projects that are simple maintenance, pavement resurfacing, or even reconstruction. Adverse impacts should be avoided when planning, designing and constructing projects that involve roadway expansion and the taking of additional right-of-way (ROW).
- When planning and locating new roadways, avoid bisecting minority or low-income neighborhoods unless there is a clear benefit to the neighborhood.
- The effects of traffic noise, congestion and pollution should be considered for all projects.
- The effects of increased vehicular traffic or increase vehicle speed should be considered, especially where large numbers of children or elderly persons are present. For pedestrians, especially the young and old, widened roadways and larger curb radii can be more dangerous to cross. It is important for roadways to be and

remain bicycle and pedestrian-friendly, especially in areas with higher numbers of pedestrians and populations less reliant on automobile use to meet their everyday transportation needs.

- In areas with transit-dependent populations, new roadways or improvements should be transit-friendly along existing or potential transit routes. For example, bus turnouts on heavily traveled roads should be added to improve safety for both the motoring and transit public, and sufficient ROW for bus stop shelters should be provided.
- Consider both positive and potential negative effects on EJ populations and neighborhoods of connecting two previously unconnected roadways (e.g. cut-thru traffic, higher traffic volume and speeding).
- In cases where adverse impacts cannot be avoided and projects must proceed for the overall benefit of the greater community, every effort should be made to identify, minimize and mitigate the impacts, including relocation to suitable, affordable and comparable housing.

PROCEDURES FOR THE PLANNING PROCESS

The procedures by which the mobility needs of minority populations are identified and considered in SLATS planning process include public outreach and GIS analysis:

- Public outreach involves inviting members of the public and reaching out to minority organizations to participate on our planning processes (e.g., public input meetings, focus groups), particularly for the LRTP, bike and pedestrian planning and transit planning. Minority participation, has been successful when specific outreach for a major plan has occurred. Participation across the board, minority or not, has been underwhelming for routine SLATS meetings and TIP development, other than active participation by local biking advocates. The SLATS Public Involvement Plan outlines processes for increasing participation. Some examples of outreach techniques include the following:
 - Broad based media such as official newspaper notices
 - Low-income, minority and LEP groups through targeted geographic areas or organizations such as Community Action and the School District of Beloit
 - Public transit users through working closely with the transit agencies
 - Private providers of transportation
 - Visual information to convey planning concepts and alternatives
 - Making documents, plans, and studies available through the SLATS website within the City of Beloit website
 - Include a statement in Spanish on all SLATS agendas and notices for Spanish-speaking LEP individuals on how to participate in the transportation planning process and who to contact for additional information.

- Other ways SLATS seeks to increase public involvement and access include:
 - Maintain SLATS website with up to date and complete information on service and public input opportunities.
 - Expand traditional outreach methods including virtual options, particularly since COVID 19.
 - Select accessible and varied meeting locations and times accessible via public transportation
 - Employ different meeting sizes and formats
 - Use social media options in addition to other resources as a way to gain public involvement
 - Explore outreach options to LEP and traditionally underserved populations
 - Continue coordination with local advocacy organizations
 - Continue coordination efforts with area transit providers (Beloit Transit System, Stateline Mass Transit District and Rock County Specialized Transit (RCST)).

- An environmental justice analysis using GIS is completed annually for the TIP, which includes maps showing the proximity of transportation projects to tracts identified as having a high percentage of minority and low-income persons. This analysis is also done every five years for the update of the LRTP, and every five years with the update of local Transit Development Plans (TDP)s. All plans and programs are available on SLATS website at www.beloitwi.gov.

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.

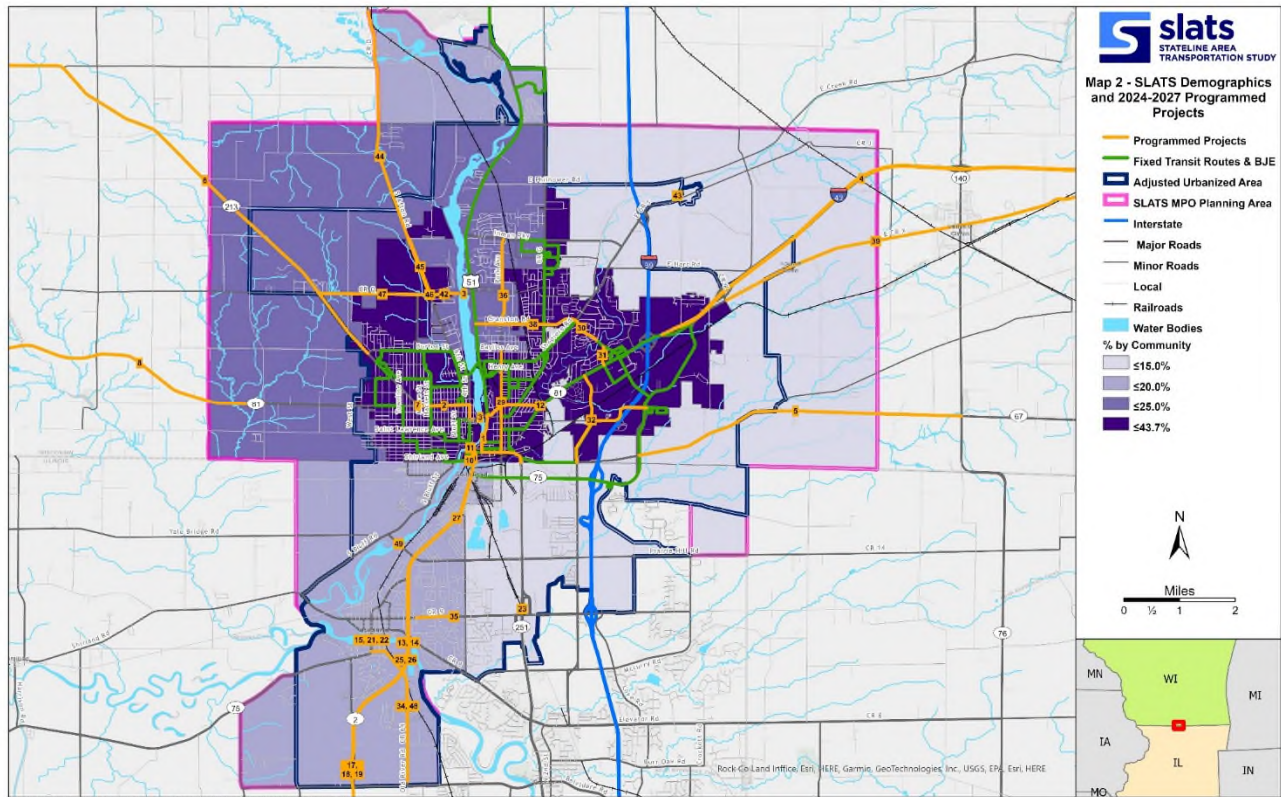
Table 3 illustrates the distribution of federal and state transit funds as reported in the 2023-2026 Transportation Improvement Program.

Table 1: Obligated and Projected Federal and State Transit Investment, 2023-2026

Transit Revenues	2023	2024	2025	2026
FTA 5307/CARES/ARPA (Operations)	\$1,368,469	\$1,454,095	\$1,128,110	\$1,152,018
FTA 5339/5307/ARPA (Capital)	\$772,953			
State Operating Assistance=	\$1,447,077	\$1,641,324	\$1,765,322	\$1,900.916
See SLATS 2023-2026 TIP for more detail online at beloitwi.gov				

Map 1 below is from the SLATS 2024-2027 Transportation Improvement Program (TIP). It shows the percent minority population by community within the SLATS area. Again, for the purposes of this analysis, minority includes all individuals who identified themselves as a race other than white and/or Hispanic or Latino (of any race). The map also shows fixed route transit (BTS and BJE) as well as all programmed projects by quick reference number in the TIP. The Beloit Transit System (BTS) provides fixed route bus service throughout the core parts of the SLATS MPA north of the state line, readily serving and providing convenient access to minority populations, while SMTD serves the Illinois portion of the SLATS area with demand response bus service. The figure does not show projects that do not have a physical location (e.g., transit operations).

Figure 2: SLATS Demographics and 2024-2027 Programmed Projects



Roadway projects, particularly reconstruction projects, have the greatest impact on communities because they often involve work beyond the roadway itself and may include some expansion, encroaching on adjacent properties. Roadway projects in the planning area that may impact low-income and disabled populations include:

- Cranston Road (USH 51 to Collingswood)
- Improvements to Illinois 2, WI-67, WI-81 and WI-213
- Bridge projects along I-43, Illinois 2, Illinois 75, Illinois 251, WI-81, Prairie Hill Road
- Park Avenue (Cranston to Inman)
- CTH X (Hart Road to county line)
- CTH D (CTH Q to River Road)
- CTH Q (213 to Rock River)
- Old River Road (Illinois 75 to Roscoe Road)
- Willowbrook Road (Milwaukee to state line).

While these projects may temporarily impact residents, particularly those without a vehicle or those unable to drive, many of the local projects noted add or improve bicycle and pedestrian facilities along the project, which ultimately improve mobility options for all. Several other standalone projects in the TIP focus solely on bike and/or pedestrian improvements. These include:

- Improvements to Park Avenue

- Old River Road multi-use path
- Rockton Road path extension
- Afton Road Sidepath
- Lee Lane sidepath

A number of projects also are focused on safety, not only for the motoring public, but for pedestrians and bicyclists as well.

Transportation Needs of EJ Populations

The communities within SLATS provide a relatively high level of public transit service throughout the MPA as well as links to the Janesville area to the north, and the Machesney Park and the Rockford area to the south. On the Wisconsin side, the Beloit Transit System (BTS) provides fixed route bus service throughout the core parts of the SLATS MPA primarily north of the state line, readily serving and providing convenient access to minority populations. BTS also subcontracts with Rock County Transit (RCT) to provide paratransit services for eligible persons with special mobility limitations who are unable to use the fixed route services. RCT will transport clients anywhere throughout Rock County, WI. BTS also cooperates with the Janesville Mass Transit System to provide a valuable link between the two communities. The Beloit Janesville Express (BJE) buses provide daily trips between Janesville and Beloit with stops along key points in between.

On the Illinois side, Stateline Mass Transit District (SMTD) provides demand-response, curb-to-curb public transit service to all persons residing within the municipalities of Rockton, Roscoe, South Beloit, Rockton Township and Roscoe Township. SMTD does not provide fixed-route bus services at this time. SMTD service is not limited to medical trips but qualifying medical trips can be made to and from medical facilities outside the normal SMTD service area. SMTD interconnects with the services offered by the Beloit Transit System and the Janesville Transit System (through the BJE) to the north, and with the services offered by the Rockford Mass Transit District to the south. The above mass transit services have been an integral participant in the SLATS planning process for years.

SLATS also plans for the mobility needs of all residents, with potentially greater impact for minority and low-income populations, through the emphasis placed on bicycle and pedestrian systems. The SLATS LRTP has contained an extensive bike and pedestrian element for more than a decade, and was created with input gathered at numerous public meetings from potential users of the bicycle and pedestrian systems. Although there is a sizable contingent of bicycle users from middle- and upper-income groups, and although investing in bicycling has a number of community-wide benefits, bicycle users that lack access to an automobile may rely more heavily on bicycle and pedestrian facilities to meet their daily transportation needs (trips to work, school, health care shopping and other). This TIP contains a number of bicycle and/or pedestrian facility improvements.

Evaluating the Impacts of Projects

For projects in the TIP, it is worth noting that small MPOs with limited and/or State directed funds rely on the State(s) to help ensure non-discrimination and evaluate the impacts of projects on EJ populations, at least with major roadway projects where little Federal or State funding is determined locally. To illustrate:

87.6% of new Federal funds for all projects in SLATS are designated for roadway and bridge projects, with an additional 8.0% for safety projects (including local and district wide). Many of these projects are determined at a State level as opposed to the MPO or local level, and although they are regionally significant and important, make up the vast majority of all the federally funded projects. Note that these percentages are based on federal funding programmed in the 2024-2027 TIP and does not include federal funding programmed prior to 2024 for projects that may still be continued in the current TIP.

New (2024 and later) federal funding for standalone bike and pedestrian facilities in SLATS is currently 0.9% percent, including the Park Avenue Bike Lanes Project in Beloit awarded to the City of Beloit through the LRIP-D program (formerly through MLS), Old River Road Path awarded to the Village of Rockton in through the ITEP program, the Rockton Road Multi-Use Path Phase 2 awarded to the Village of Rockton through the ITEP program, the Afton Road Sidepath awarded to Rock County through the TAP program and the Lee Lane Sidepath funded with STBG-U dollars through SLATS to the City of Beloit. Bicycle and pedestrian facilities provide modes of transportation that can greatly benefit those that lack access to an automobile, and provide many more benefits to communities (improve health, safety, quality of life, minimize automobile trips, reduce infrastructure costs, reduce congestion, combat sprawl, reduce emissions and so on). Again, this percentage is based on new federal funding programmed in the 2024-2027 TIP and does not include federal funding programmed prior to 2024 for projects that may still be continued in the current TIP. Nor does it include roadway projects with a bike or pedestrian component, which several projects in the TIP include.

Transit funding in SLATS makes up about 3.5% of the total Federal funding. Like bicycle and pedestrian facilities, transit is a transportation mode that can greatly benefit those that lack access to an automobile and rely on it as a primary means of transportation to school, work, shopping or health care. Transit spending is higher than bicycle and pedestrian facility spending, but still a relatively low percentage of the total State and Federal funding programmed for SLATS. Maintaining current service levels with available funding is a challenge, but even so, Beloit Transit and SMTD continually look for ways to expand, improve and coordinate service. For instance, BTS updated the fixed route system in 2020 to improve coverage, frequency and access to employment centers such as the Gateway Business Park, and is evaluating if and how microtransit might further enhance transit service. SMTD continues to grow its demand-response service, and explore options for fixed or deviated fixed-route service in the northern Illinois communities within SLATS. Although it is a small percentage of total transportation funding, adequate transit funding is essential to effectively serve EJ populations. Even a small reduction in funding would have significant impacts on service.

Overall, there is no evidence of discrimination or disparate impacts on EJ populations in the SLATS MPA. Roadway projects programmed are dispersed and generally serve the entire community

including EJ populations. This dispersion of projects indicates that no single area or population group is receiving.

Limited-English Proficiency (LEP) Plan

Overview

As a subrecipient of federal financial assistance, SLATS 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 who 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) SLATS 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

SLATS 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 SLATS. 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, SLATS 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, SLATS conducted a four-factor analysis which considers:

- **Demography** of LEP persons who may be served or are likely to encounter a SLATS 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 A SLATS PROGRAM OR SERVICE.

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

The most recent five-year estimates report the municipalities of the planning area include residents grouped as speaking Spanish, Other Indo-European languages, Asian and Pacific Island languages, and Other languages. The most prevalent non-English language group is Spanish.

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), SLATS must provide translation of vital documents in written format for non-English speaking persons.

Table 4 shows the SLATS regional population estimate of 421,424¹ and a limited-English proficient (LEP)² population of 16,727 (3.9%). Spanish language speakers who speak English less than very well (LEP) have an estimate (11,663) that exceeds the minimum threshold of 1,000 persons. The estimate for Rock and Winnebago counties for “LEP All other-than-Spanish speakers” (5,064), also exceeds the 1,000-person threshold. However, using data from two counties is somewhat arbitrary since the SLATS population is less than 20% of the total. When estimates for just the SLATS local communities are considered, only Spanish language speakers exceed Safe Harbor Thresholds, particularly in the City of Beloit, which alone has an estimated 1,594 (+/-352) persons. In general, the estimate of all other LEP speakers in the SLATS area is less than both Safe Harbor thresholds (1,000 persons or 5%). This means SLATS is not required at this time to provide written translation of vital documents in any other language than Spanish.

To respond to the needs of LEP Spanish speakers, SLATS translated its vital documents (Notice of Nondiscrimination, Complaint Procedure, and Complaint Form) into Spanish. These documents are shown in Appendix D. These documents, as well as the request for assistance statements in Spanish, are available on the SLATS website at www.beloitwi.gov.

Table 3: Estimate of Limited-English Proficient Persons in SLATS Area

Attribute	Estimate	Margin of Error	% Estimate
SLATS Regional Population ¹	421,424	-----	-----
SLATS Regional Limited-English Proficient (LEP) ²	16,727	1,586	3.9%
SLATS Regional LEP Spanish language speakers	11,663	1,281	2.8%
SLATS Regional LEP All other other-than-Spanish speakers	5,064	1,452	1.2%
SLATS Local Population	66,338	-----	-----
SLATS Local Limited-English Proficient (LEP)	2,676	900	4.0%
SLATS Local LEP Spanish language speakers	2,232	815	3.4%
SLATS Local LEP All other other-than-Spanish speakers	444	495	0.7%

FACTOR 2 – FREQUENCY OF CONTACT WITH LEP PERSONS.

SLATS staff reviewed the frequency with which its 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, SLATS has had no requests for interpreters and no requests for translated program documents. SLATS Policy Board, SLATS staff, and SLATS contractors have had no known contact with LEP persons.

SLATS staff have been trained to track the number of LEP encounters using the LEP Tools in Tables 5 and 6 and shown in Appendix E. and considers adjustments as needed to its outreach efforts to

¹ Population 5 years and over; universe for S1601, Rock and Winnebago Counties.

² Speaks English “less than very well.”

ensure meaningful access to all persons and specifically to LEP and minority populations of SLATS programs and services.

Table 5 is an example of the *Log of LEP Encounters* that is used to record LEP encounters when/if they occur.

Table 4: 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, SLATS would work to provide a reasonable accommodation. The “I Speak” Language Identification Card is a document is a tool used by SLATS staff to assist LEP individuals. The “I Speak” Language Identification Card³ illustrated in Table 6 includes languages spoken in SLATS planning area as identified by U.S. Census data. Languages can be added or removed to match the demographics of the SLATS service area.

Table 5: "I Speak" Language Identification Card

Mark this Box if you speak ...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	我說中文	Chinese
	E nói tiếng Việt	Vietnamese
	나는 한국어를	Korean
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja govorim српски	Serbian
	میں نے اردو بولتے ہیں	Urdu
	Ja mówię po polsku	Polish
	ฉันพูดไทย	Thai

³ For additional languages not in Table 6 visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>.

	Io parlo italiano	Italian
	Govorim hrvatski	Croatian

FACTOR 3 – IMPORTANCE OF PROGRAM TO LEP PERSONS.

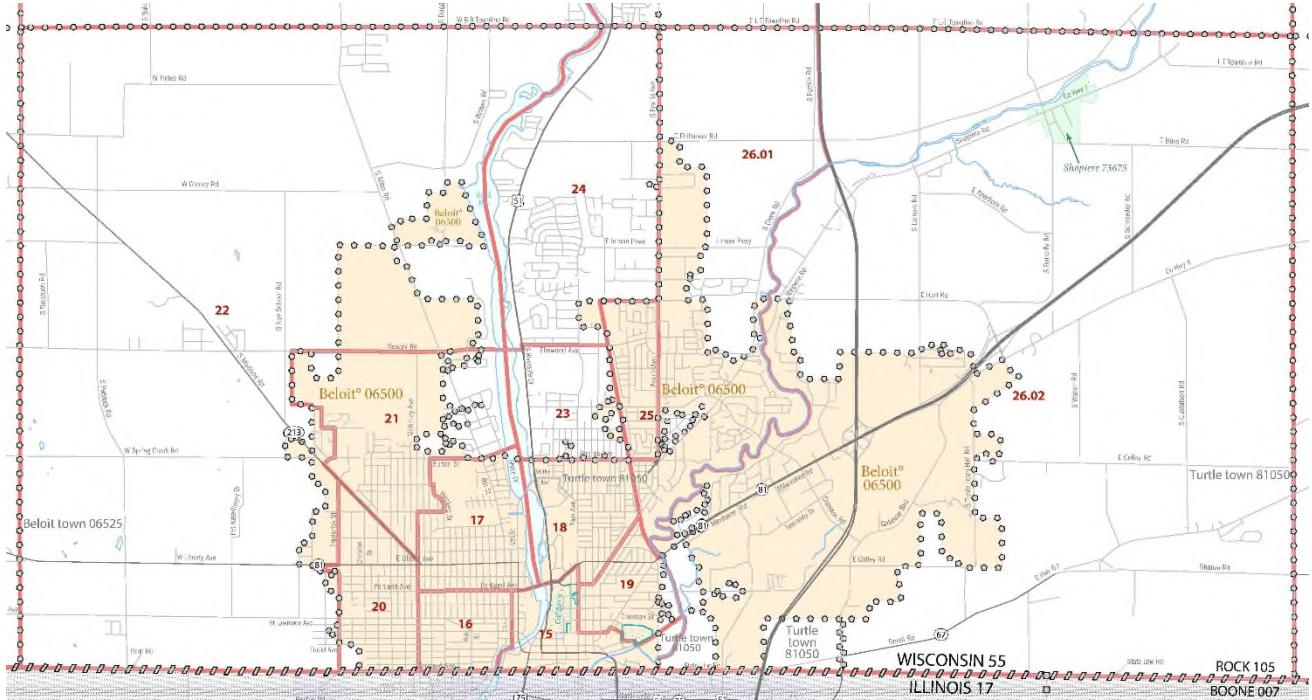
Understanding that an LEP person with a language barrier can face difficulties accessing essential services, SLATS has committed to ensuring that all segments of the population, including LEP persons, can participate in the transportation planning process.

With improving outreach activities, the Policy Board, SLATS staff, and SLATS contractors are working to increase contact with LEP individuals at public meetings and other general public involvement activities.

The potential impact of transportation projects on LEP persons and other disadvantaged populations is assessed annually with the update of the Transportation Improvement Program (TIP). An GIS map is created to illustrate projects and their relationship to disadvantaged populations, and is updated annually.

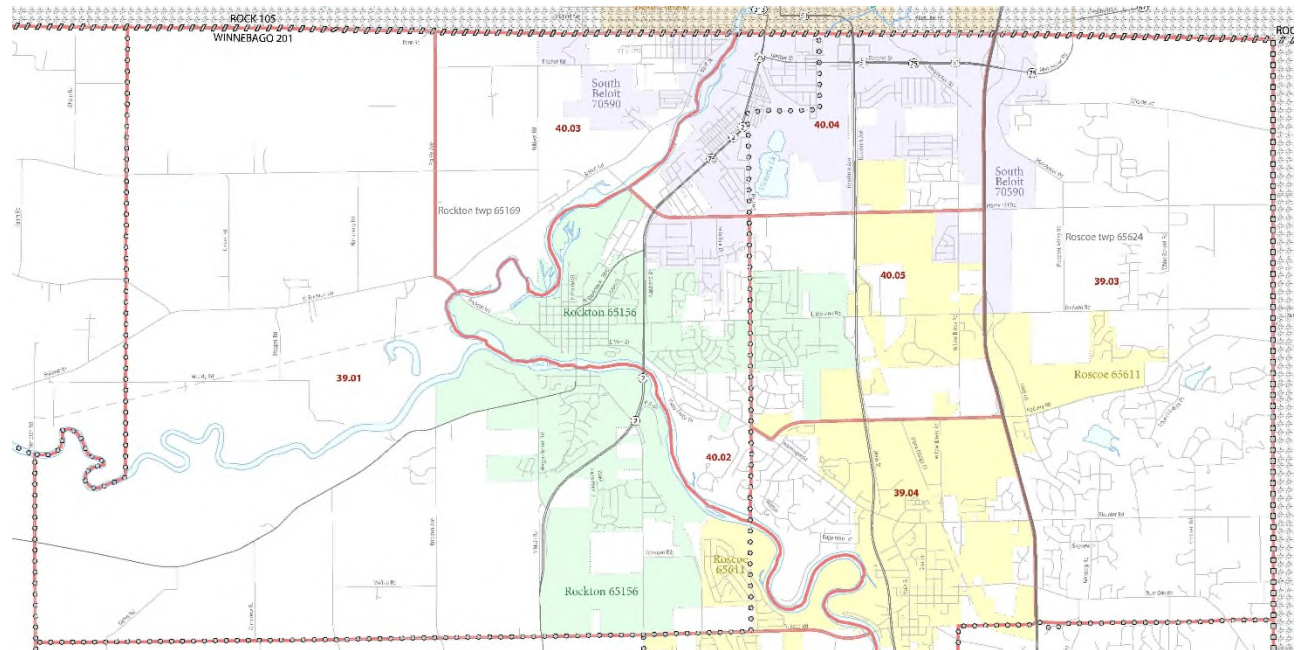
The most recent ACS data (2017-2021) show that tract 18 followed by tract 16 in the City of Beloit has the highest numbers of LEP persons, between 400-500 persons in each tract, all of whom are Spanish-speaking. However, most tracts on the Wisconsin-side of SLATS with the exception of 21, 22, 24 and 25 exceed the percentage of persons who speak English less than very well that are five years old or older compared to Rock County, which is approximately 2.7%. The tracts with the highest percentages of LEP persons again are tracts 18 and 16 which are approximately 11.7% and 9.6% respectively. These areas locally are known as the Merrill and Hackett neighborhoods, and are generally located near the urban core on either side of the Rock River.

Figure 2: SLATS Area 2020 Census Tracts – Rock County



For the Illinois portion of SLATS, the only tract that exceeds the percentage of persons who speak English less than very well that are five years old or older compared to Winnebago County which is approximately 4.7%, is tract 40.03 at approximately 6.7%. This is the tract located west of the Rock River, and is the only tract on the Illinois side of SLATS that also includes a high proportion of low-income persons compared to the county as a whole.

Figure 3: SLATS Area 2020 Census Tracts – Winnebago County



FACTOR 4 – RESOURCES AND COSTS TO PROVIDE LEP ASSISTANCE

Given the small size of LEP encounters and relatively small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, SLATS regularly translates not only vital documents into Spanish, but also public outreach materials such as surveys and information sheets related to specific transportation projects such as transit plans and bike and pedestrian plans. Likewise, SLATS engaged an LEP-related focus group as part of the LRTP update.

SLATS has no contract for language interpreter services since such services have never been requested, however anyone in need of language interpretation may call SLATS staff office at 608-364-6702 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 SLATS programs and services. Language assistance can include interpretation and/or translation from one language into another language.

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

SLATS strives to offer the following measures:

- ✓ Post Title VI, LEP, and ADA information on the SLATS website including critical documents in Spanish, such as the Non-discrimination Notice, the Complaint Procedure and the Complaint Form.
- ✓ Post a statement on SLATS notices and agendas stating, “Para más información o si usted está interesado en participar en el planeamiento del proceso de transporte en su comunidad y si usted necesita asistencia con el idioma, por favor comuníquese al teléfono 608-364-6702.” This translates to “For more information or if you are interested in participating in the planning of the transportation process in your community and if you need language assistance, please contact 608-364-6702.”
- ✓ At public meetings or other community input events:
 - Greet participants as they arrive at SLATS 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.
- ✓ 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 SLATS staff periodically on their experience concerning contacts with LEP persons during the previous year.
- ✓ As resources allow, make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Provide assistance with language interpretation. SLATS has no contract for language interpreter services since such services have never been requested, however anyone in need of language interpretation may call SLATS staff office at 608-364-6702 for assistance.
- ✓ Seek translation assistance from community organizations such as:
 - The Stateline Literacy Council (SLC), located in the Beloit Public Library at 605 Eclipse Boulevard, Beloit, WI 53511 <https://www.statelineliteracycouncilbeloit.org/>
 - The Latino Service Providers Coalition (LSPC) located at 717 Hackett St., Beloit, WI 53511 on Facebook.
 - City of Beloit staff as available
 - School District of Beloit staff as applicable
 - Contracted translation services as needed
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <https://wisconsinrelay.com> as applicable.
- ✓ Utilize online resources such as Google Translate to assist with translation requests. The main downside of this approach is accuracy. As such, this option will be used by SLATS if assistance from fluent speakers is not readily available.
- ✓ Prioritize the hiring of bilingual staff if possible.
- ✓ Translate community surveys and outreach materials into Spanish for planning studies, particularly transit-related studies.

INFORMING LEP PERSONS OF LANGUAGE ASSISTANCE SERVICES

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

- ✓ Post a statement on SLATS notices and agendas stating, “Para más información o si usted está interesado en participar en el planeamiento del proceso de transporte en su comunidad y si usted necesita asistencia con el idioma, por favor comuníquese al teléfono 608-364-6702.” This translates to “For more information or if you are interested in participating in the planning of the transportation process in your community and if you need language assistance, please contact 608-364-6702.”
- ✓ Post Title VI, LEP, and ADA information on the SLATS website including critical documents in Spanish, such as the Non-discrimination Notice, the Complaint Procedure and the Complaint Form.

- ✓ When encountering LEP persons directly, as needed use the “*I Speak*” *Language Identification Card* to identify the language and communication need of LEP persons. SLATS 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.
- ✓ Review 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.

MONITORING, EVALUATING AND UPDATING THE LEP PLAN

SLATS 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 a 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 SLATS staff:

- ✓ Information on the SLATS 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 F) 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

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

- Post notices and agendas in English with information translated in Spanish on how to obtain more information on participation and language assistance. Notices are published in the newspaper and agendas are posted on the SLATS website.
- Post the Title VI Plan to SLATS website.

- Email our mailing lists when the *Title VI Non-Discrimination Program and Limited-English Proficiency Plan* is available for review ahead of the SLATS meeting in which action on the Plan is anticipated.

Appendix A: Title VI Approvals and Administration

Resolution Approving Title VI Plan

SLATS RESOLUTION 2023-13

APPROVAL OF THE SLATS TITLE VI PROGRAM AND LIMITED-ENGLISH PROFICIENCY (LEP) 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 SLATS 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, SLATS 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 SLATS program or activity, regardless of funding source; and

WHEREAS, SLATS 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 SLATS approves the *Title VI Non-Discrimination Program and Limited-English Proficiency Plan* as being consistent with metropolitan plans and policies.

Adopted this 23rd Day of October, 2023

ATTESTS:

Vice Chair, SLATS Policy Board

Director of Planning and Building Services

Log of Policy Updates

SLATS will review its policy on an annual basis to determine if modifications are necessary. Table 7 is current as of this approval and will be used to record future updates.

Table 6: Log of Policy Updates

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks/Notes
10/23/2023	Update approved by Policy Board; noticed and posted to website	TJ Nee	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits of which there have been none, public outreach efforts.
10/26/2020	Update approved by Policy Board; noticed and posted to website	TJ Nee	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits of which there have been none, public outreach efforts.
12/7/2017	Update approved by Policy Board; noticed and posted to website	TJ Nee	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits of which there have been none, public outreach efforts.
8/25/2014	First Plan approved by Policy Board; noticed and posted to website.	TJ Nee	

Contact Information and Program Administration

SLATS Title VI/ADA Coordinator/ Coordinador de Título VI / ADA de MPO/PC

TJ Nee, Director of Planning and Building Services

Phone: 608.364.6711

E-mail: neet@beloitwi.gov

Appendix B: Title VI/Nondiscrimination Assurances

Policy Statement and Authorities

Title VI Policy Statement

SLATS, 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

SLATS (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 and Federal Transit 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.

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:

"SLATS 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.

By signing this ASSURANCE, SLATS 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 and Illinois 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 or Illinois Department of Transportation. You must keep records, reports, and submit the material for review upon request to Wisconsin Department of Transportation or Illinois 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.

SLATS 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 and Illinois, 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.

Stateline Area Transportation Study (SLATS)

By

TJ Nee, Director of Planning and Building Services

October 23, 2023

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Appendix C: Protections Under Title VI

Public Notice of Non-Discrimination

Notice of Nondiscrimination Stateline Area Transportation Study (SLATS)

- ✓ SLATS 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 SLATS 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 SLATS.
- ✓ For more information on the SLATS civil rights program, and the procedures to file a complaint, contact 608-364-6702 (for hearing impaired, please use Wisconsin Relay 711 service), email neet@beloitwi.gov, or visit our administrative office at 100 State Street, Beloit, WI 53511. For more information, visit www.beloitwi.gov.
- ✓ 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, 4822 Madison Yards Way, 5th 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
 - 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
- ✓ If information is needed in another language, contact 608-364-6702.
Si se necesita informacion en otro idioma de contacto, 608-364-6702.

Complaint Procedure

The SLATS Complaint Procedure is made available in the following locations:

- SLATS website in its entirety – www.beloitwi.gov
- SLATS office at 100 State Street, Beloit, WI 53511

If information is needed in another language, contact 608-364-6702.
Si se necesita informacion en otro idioma de contacto 608-364-6702.

Overview

SLATS 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 SLATS in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Right to File Complaints

SLATS uses the following procedures for prompt processing of all civil rights complaints relating to any program, activity or service administered by SLATS 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 SLATS may file a complaint with the following:

1. SLATS, at 608-364-6702 (for hearing impaired, please use Wisconsin Relay 711 service - <https://wisconsinrelay.com>; email neet@beloitwi.gov; or visit our administrative office at 100 State Street, Beloit, WI 53511
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, 4822 Madison Yards Way, 5th 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
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

Procedures

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

This civil rights complaint procedure may also be used by SLATS 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 SLATS Title VI Coordinator may be utilized for resolution, at any stage of the process. SLATS Title VI Coordinator will make every effort to pursue a resolution of the complaint.

Complaints can be submitted to SLATS in writing via email or by phone. Complainants are encouraged to complete the Complaint Form. 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 SLATS 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.

SLATS 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.

SLATS reviews and determines the appropriate action regarding every complaint.

When a complaint is received, SLATS will provide written acknowledgment to the Complainant within 60 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 SLATS has jurisdiction.
- ✓ An indication of when the parties will be contacted.

The investigation conducted by SLATS 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, SLATS may contact the Complainant. If a complaint is deemed incomplete or if additional information is requested, the Complainant will be provided 15 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within 15 business days of the acceptance of the complaint, SLATS 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 SLATS reviews the complaint, one of two (2) letters and 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 15 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

SLATS maintains a Complaint Log 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 SLATS in response, and final findings related to the complaint, investigation, or lawsuit.

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

For more information, contact:

SLATS, Title VI Coordinator
 TJ Nee, Director of Planning and Building Services
 Phone: 608.364.6711
 E-mail: neet@beloitwi.gov

Complaint and Comment Form

We want your feedback. If you would like to submit a comment of complaint to SLATS, please complete the form and submit via email at neet@beloitwi.gov or in person at the address below.

SLATS
 100 State Street, Beloit, WI 53511

You may also call us at 608-364-6702. 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)
--------------------------------------	---------------------------------------	--	---

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

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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.

Complaint

Suggestion

Compliment

Other

Which of the following describes the nature of the comment? Please check one or more of the check boxes.

Race

Color

National Origin

Religion

Age

Sex

Service

Income Status

Limited English Proficient (L.E.P)

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? Please check any box that may apply.

Paratransit

Shared Ride
Taxi

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

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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

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

<input type="checkbox"/> Phone	<input type="checkbox"/> Email	<input type="checkbox"/> 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 below 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 SLATS.

Name

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

Signature

Complaint Log

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

Check One:

X	Because SLATS 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. SLATS will strive to complete the investigation within the timeframe specified in its Complaint Procedure.

Table 7: 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 ⁴	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

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

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

Appendix D: Vital Documents for Spanish Speakers

Notice of Nondiscrimination

Complaint Procedure

Complaint Form

-This section is under construction-

Appendix E: 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
	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

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