

SLATS RESOLUTION 2020-8
ADOPTION OF THE SLATS TITLE VI / AMERICANS WITH DISABILITIES ACT (ADA) PLAN

WHEREAS, the Stateline Area Transportation Study is the Metropolitan Planning Organization for the Beloit (WI-IL) Urbanized Area and the greater Stateline Metropolitan Planning Area (MPA); and

WHEREAS, the SLATS Policy Board has the responsibility to direct, coordinate, and administer the transportation planning process throughout the MPA; and

WHEREAS, as a sub-recipient of Federal funds, SLATS is required to ensure that the transportation planning and decision-making processes and activities of SLATS are fair and nondiscriminatory to all persons in accordance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and Title II of the Americans with Disabilities Act (ADA); and

WHEREAS, SLATS staff has prepared a Title VI/Americans with Disabilities Act (ADA) Plan in accordance with FTA Circular 4702.1B, documenting SLATS compliance with the above Act; and

WHEREAS, the SLATS Policy Board and Technical Advisory Committee have reviewed the above cited Plan and concur with its content and findings; and

NOW, THEREFORE, BE IT RESOLVED that the SLATS Policy Board adopts the **SLATS Title VI / Americans with Disabilities Act (ADA) Plan revision date October 7, 2020**); and

BE IT FURTHER RESOLVED the Policy Board directs the staff to transmit the Program to the appropriate Federal and State agencies.

Adopted this 26th Day of October, 2020

ATTESTS:

Chair, SLATS Policy Board

MPO Coordinator

Stateline Area Transportation Study (SLATS)
Title VI/Americans with Disabilities Act (ADA) Plan¹

Revised on: October 7, 2020

Adopted by: SLATS Policy Board

Adopted on: October 26, 2020

This policy is hereby adopted and signed by:

SLATS

SLATS Policy Board Chair: Dale Adams

Chair Signature: _____

Policy Statement

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.

Title VI/ADA Plan Elements

SLATS's Title VI/ADA plan includes the following elements:

1. Evidence of Policy Approval, Log of Policy Updates, Contact Information/Program Administration
2. Notice of Nondiscrimination
3. Complaint Procedure
4. Complaint Form
5. List of transit related Complaints, Investigations and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

¹ **Title VI** of the Civil Rights Act of 1964 states "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." – Title 42 USC Section 2000d

Title II of the Americans with Disabilities Act (ADA) protects individuals with disabilities from discrimination on the basis of disability in services, programs and activities provided by State and local government entities.

SLATS will review its policy on an annual basis to determine if modifications are necessary.

SLATS will use the table below to record reviews/revisions made to the plan.

As applicable, **SLATS** will discuss Title VI/ADA plan requirements with its transit contractor on an annual basis to ensure compliance with Title VI/ADA plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
12/7/2017	Title VI Plan Update	T.J. Nee	Adopted by SLATS Board 12/7/2017
9/21/2020	Title VI/ADA Plan Update	T.J. Nee	Adopted by SLATS Board 10/26/2020

Contact Information/Program Administration

MPO Coordinator

SLATS's MPO Coordinator under review and direction from the SLATS Policy Board will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

SLATS's MPO Coordinator will ensure implementation of SLATS's federally funded transportation program. The MPO Coordinator has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **SLATS's** Board Chair.

Name:	T.J. Nee
Email:	neet@beloitwi.gov
Phone:	608-364-6702

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

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

Title VI/ADA - Notice of Nondiscrimination to the Public²

SLATS's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

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 SLATS.
- ✓ For more information on SLATS's civil rights program, and the procedures to file a complaint, contact 608-364-6702, email neet@beloitwi.gov; or visit our administrative office at 2400 Springbrook Court, Beloit, WI 53511. For more information, visit <http://www.beloitwi.gov>
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 608-364-6702.
Si se necesita informacion en otro idioma de contacto, 608-364-6702.

SLATS's *Notice of Nondiscrimination* is posted in the following locations

- ✓ Agency webpage located through <http://www.beloitwi.gov>
- ✓ Public areas of the agency office

SLATS's *Notice of Nondiscrimination* in Spanish is as follows:

² Title VI and ADA regulations require **SLATS** to inform customers and the public of their rights under Title VI and ADA regulations by posting a *Notice of Nondiscrimination*. The public notice must include:

- ✓ A statement of nondiscrimination;
- ✓ Information on how to request additional information about the agency's Title VI and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc.;
- ✓ Information on how to request Title VI and ADA information in another language, if required.

The *Notice of Nondiscrimination* should be posted in the following locations: website, public areas of the agencies office.

Aviso de no discriminación SLATS

- ✓ **SLATS** se compromete a garantizar que ninguna persona sea excluida, participe, se le nieguen los beneficios o se la discrimine por motivos de raza, color, nacionalidad, discapacidad, sexo, edad, religión, estado de ingresos o limitada. Dominio del inglés (LEP) en todos y cada uno de los programas, actividades o servicios administrados por **SLATS** de conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y las autoridades de no discriminación relacionadas.
- ✓ Cualquier persona que crea que ha sido perjudicada por cualquier práctica discriminatoria ilegal puede presentar una queja ante **SLATS**.
- ✓ Para obtener más información sobre el programa de derechos civiles de **SLATS** y los procedimientos para presentar una queja, comuníquese al 608-264-6702, envíe un correo electrónico a neet@beloitwi.gov; o visite nuestra oficina administrativa en 2400 Springbrook Court, Beloit, WI 53511. Para obtener más información, visite <http://www.beloitwi.gov>.
- ✓ Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, Edificio Este, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ Si necesita información en otro idioma, comuníquese al 608-264-6702.
Si se necesita información en otro idioma de contacto, 608-264-6702.

Complaint Procedure

SLATS's Complaint Procedure is made available in the following locations and is also available in Spanish: *(list all that apply)*

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Public area of the agency office

Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by SLATS may file a complaint by completing and submitting SLATS's Complaint Form.

The Complaint Form may also be used to submit general complaints to SLATS.

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

Once the complaint is received, SLATS will review the complaint and work to resolve the complaint informally, if possible.

If the complaint warrants a formal civil rights complaint process, SLATS will follow the steps listed in this complaint procedure. SLATS may also use this formal procedure to address general complaints. If SLATS determines it has jurisdiction the complainant will receive an acknowledgement letter stating the complaint will be investigated by SLATS as a civil rights complaint.

SLATS has 60 business days to investigate the civil rights complaint. If more information is needed to resolve the case, SLATS may contact the complainant.

The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, SLATS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, 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 that there was not a Title VI/ADA 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 or the LOF to do so.

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

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

Procedimiento de queja

El Procedimiento de queja de **SLATS** está disponible en los siguientes lugares y también está disponible en inglés: (*enumere todos los que correspondan*)

- ✓ Sitio web de la agencia, ya sea como referencia en el Aviso al público o en su totalidad
- ✓ Área pública de la oficina de la agencia
- ✓ Refugios / instalaciones de tránsito

Cualquier persona que crea que ha sido discriminada por su raza, color, origen nacional, discapacidad, sexo, edad, religión, estado de ingresos o dominio limitado del inglés (LEP) por el **SLATS** puede presentar una queja completando y presentando el Formulario de queja de **SLATS**.

El Formulario de queja también se puede usar para presentar quejas generales al **SLATS**.

El **SLATS** investiga las quejas recibidas no más de 180 días hábiles después del presunto incidente. El **SLATS** procesará las quejas que estén completas.

Una vez que se recibe la queja, el **SLATS** revisará la queja y trabajará para resolverla de manera informal, si es posible.

Si la queja garantiza un proceso formal de queja de derechos civiles, el **SLATS** seguirá los pasos enumerados en este procedimiento de queja. El **SLATS** también puede usar este procedimiento formal para atender quejas generales. Si el **SLATS** determina que tiene jurisdicción, el demandante recibirá una carta de reconocimiento indicando que el reclamo será investigado por el **SLATS** como una queja de derechos civiles.

El **SLATS** tiene 60 días hábiles para investigar la queja de derechos civiles. Si se necesita más información para resolver el caso, el **SLATS** puede contactar al demandante.

El demandante tiene 15 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Si el demandante no contacta al investigador o no recibe la información adicional dentro de los 15 días hábiles, el **SLATS** puede cerrar el caso administrativamente. Un caso puede cerrarse administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el investigador revise la queja, se emitirá una de dos (2) cartas al demandante: una carta de cierre o una carta de hallazgo (LOF).

- ✓ Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI / ADA y que el caso se cerrará.
- ✓ Una carta de hallazgos (LOF) resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si ocurrirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción.

Si el demandante desea apelar la decisión, tiene 15 días hábiles después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en la Oficina de Derechos Civiles de la FTA, 1200 New Jersey Avenue SE, Washington, DC 20590.

Si se necesita información en otro idioma, comuníquese al 608-364-6702.

SLATS - Complaint/Comment Form

Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at neet@beloitwi.gov or in person at the address below.

SLATS

2400 Springbrook Court
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)
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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

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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

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.		
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 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 SLATS

Name: Click or tap here to enter text.

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

Signature: Click or tap here to enter text.

SLATS - Formulario de queja / comentario

Utilice este formulario para sugerencias, cumplidos y quejas.

Envíe este formulario electrónicamente a neet@beloitwi.gov o en persona a la siguiente dirección.

SLATS

2400 Springbrook Court
Beloit, WI 53511

También puede llamarnos al 608-364-6702. Asegúrese de proporcionar su información de contacto para recibir una respuesta.

Sección A: Requisitos de formato accesible

Por favor verifique el formato preferido para este documento

<input type="checkbox"/> Letra grande	<input type="checkbox"/> TDD o retransmisión	<input type="checkbox"/> Grabación de audio	<input type="checkbox"/> Otro (si está seleccionado, indique qué tipo de formato necesita en el cuadro a continuación)
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Haga clic o toque aquí para ingresar texto.

Sección B: Información de contacto

Nombre <input type="text"/>	Número de teléfono (incluido el código de área) <input type="text"/>
Dirección <input type="text"/>	Ciudad <input type="text"/>
Estado <input type="text"/>	Código postal <input type="text"/>

Dirección de correo electrónico

¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
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En caso negativo, proporcione el nombre y la relación de la persona por la que se queja y por qué está completando el formulario en su nombre en el cuadro a continuación.

Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una solicitud en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
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Sección C: Tipo de comentario

¿Qué tipo de comentario estás proporcionando? Por favor, compruebe qué categoría se aplica mejor.

<input type="checkbox"/> Queja	<input type="checkbox"/> Sugerencia	<input type="checkbox"/> Cumplido	<input type="checkbox"/> Otro
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¿Cuál de los siguientes describe la naturaleza del comentario? Por favor marque una o más de las casillas de verificación.

<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen nacional	<input type="checkbox"/> Religión
<input type="checkbox"/> Edad	<input type="checkbox"/> Sexo	<input type="checkbox"/> Servicio	<input type="checkbox"/> Estado de ingresos
<input type="checkbox"/> Dominio limitado del inglés (L.E.P)		<input type="checkbox"/> Ley de estadounidenses con discapacidad (A.D.A)	

Sección D: Detalles del comentario

Responda las preguntas a continuación con respecto a su comentario.

¿Cuál fue el momento de la ocurrencia?	Haga clic para agregar la fecha en el siguiente formato: día, mes, año	
¿Cuál fue el momento de la ocurrencia?	Haga clic para agregar la hora	
¿Cuál es el nombre o la identificación del empleado o empleados involucrados?	Haga clic o toque aquí para ingresar texto.	
¿Cuál es el nombre o la identificación de otras personas involucradas, si corresponde?	Haga clic o toque aquí para ingresar texto.	
¿Dónde estaba la ubicación del hecho?	Haga clic o toque aquí para ingresar texto.	
¿El uso de una ayuda de movilidad estuvo involucrado en el incidente?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Agregue cualquier detalle descriptivo adicional sobre el incidente.	Haga clic o toque aquí para ingresar texto.	

En el cuadro a continuación, explique con la mayor claridad posible lo que sucedió y por qué cree que fue discriminado.

Haga clic o toque aquí para ingresar texto.

Sección E: Seguimiento

¿Podemos contactarlo si necesitamos más detalles o información?

Sí

No

En caso afirmativo, ¿cómo le gustaría ser contactado? Seleccione su forma de contacto preferida a continuación

Teléfono

Correo electrónico

Correo

Si prefiere que lo contactemos por teléfono, indique el mejor día y hora para comunicarse con usted.

Haga clic aquí para agregar su hora preferida

Haga clic aquí para agregar su día preferido

Sección F: Resultado deseado

Enumere a continuación, los pasos que le gustaría tomar para abordar el conflicto o el problema.

Haga clic o toque aquí para ingresar texto.

Si corresponde, enumere a continuación todas las agencias adicionales con las que ha presentado esta queja, como las agencias federales, estatales o locales, o ante cualquier tribunal federal o estatal. Incluya la información de contacto a donde se envió la queja.

Haga clic o toque aquí para ingresar texto.

Sección G: Firma

Adjunte todos los documentos que tenga que respalden la denuncia. Luego feche y firme este formulario y envíelo al SLATS

Nombre: Haga clic o toque aquí para ingresar texto.

Fecha: Haga clic para agregar la fecha en el siguiente formato: día, mes, año

Firma: Haga clic o toque aquí para ingresar texto.

List of Complaints, Investigations and Lawsuits³

SLATS maintains a list or log to track and resolve all complaints, investigations and lawsuits, pertaining to its transit-related activities.

Check One:

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

There have been investigations, complaints and/or lawsuits filed against us. *See list below.*
 _____ *Attach additional information as needed.*

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint ⁴	Summary Complaint Description	Status	Action(s) Taken

³ **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

⁴ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, SLATS will employ the following strategies, as appropriate:

- ✓ Maintain SLATS website with up to date and complete information on service and public input opportunities.
- ✓ Expand traditional outreach methods including virtual options.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Explore social media options in addition to other resources as a way to gain public involvement
- ✓ Explore outreach options to LEP and traditionally underserved populations
- ✓ 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).

Public Outreach Activities

SLATS maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. SLATS will continue to review if additional or different strategies would be useful to promote inclusive public participation.

The direct public outreach and involvement activities conducted by SLATS for 2017-2019 are summarized in the table below. Efforts include *meetings, surveys, focus groups, attendance at community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method will be used for future planning efforts.

Event Date	SLATS or other Staff (e.g MPO, Consultant)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
6/12/17	Flesch, Dupuis, Nee	TIP Amendment for SLATS	Formal Public Notice 5/26/17 & 6/5/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 31 attendees
9/27/17	Flesch, Dupuis, Nee	Draft TIP	Formal Public Notice 9/13/17 & 9/20/17, MPO Website, Email List	Open House	Stateline YMCA (combined with Bike and Pedestrian Plan Open House) 16 attendees

Event Date	SLATS or other Staff (e.g MPO, Consultant)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
10/23/17	Flesch, Dupuis, Nee	Final TIP	Formal Public Notice 10/9/17 & 10/16/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 21 attendees
12/7/17	Flesch, Nee	SLATS Title VI Plan	Formal Public Notice 11/22/17 & 11/30/17, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 20 attendees
2/20/18	Flesch, Dupuis, Nee	HSIP Performance Measure Targets	Formal Public Notice 2/6/18 & 2/13/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 23 attendees
4/16/18	Flesch, Dupuis, Nee	Cooperative Agreement between SLATS, SLATS and IDOT	Formal Public Notice 3/16/18 & 3/23/18, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 24 attendees
5/21/18	Flesch, Dupuis, Nee	SLATS LRTP Amendment to incorporate Pedestrian and Bicycle Plan Update*	Formal Public Notice 4/6/18 & 4/13/18 for 30 day public comment period, 5/7/18 & 5/14/18 for meeting, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 28 attendees
10/15/18	Dupuis, Nee	Draft TIP	Formal Public Notice 9/28/18 & 10/5/18, MPO Website, Email List	Open House	Beloit Public Library 3 attendees
10/29/18	Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan	Formal Public Notice 10/16/18 & 10/22/18, MPO Website, Email	MPO Joint Policy Board and Technical	Beloit Public Library 21 attendees

Event Date	SLATS or other Staff (e.g MPO, Consultant)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes
		Performance Measure Targets	List	Advisory Meeting	
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Onsite in-person	Pop-up meetings	7 locations around Stateline with about 40 participants
6/3/19-6/4/19	SRF	MPO-wide Transit Plan	Internal scheduling	Stakeholder meetings	7 meetings with representatives from area organizations
7/24/19	SRF	MPO-wide Transit Plan	Email lists, City website, Facebook during survey timeframe	Community Survey (paper and online)	English and Spanish at 8 locations and online. 88 responses.
8/6/19	Dupuis, Nee	STBG-U funding/functional classification updates	Formal Public Notice 7/23/19 & 7/30/19, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 26 attendees
10/14/19	Dupuis, Nee	Draft TIP	Formal Public Notice 9/27/19 & 10/4/19, MPO Website, Email List	Open House	Beloit Public Library 4 attendees
10/28/19	Dupuis, Nee	Final TIP, Final UPWP (includes MPO-wide Transit Plan, TAM Plan Performance Measure Targets	Formal Public Notice 10/11/19 & 10/21/19, MPO Website, Email List	MPO Joint Policy Board and Technical Advisory Meeting	Beloit Public Library 22 attendees

*Note the Pedestrian and Bike System Plan Update included numerous targeted outreach activities and meetings including at the Beloit Farmer's Market, Community Action, Rotary, Latino Services Coalition, Stateline YMCA and SLATS.

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **SLATS** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

SLATS's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, **SLATS** has conducted a *Four Factor Analysis*⁵ of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP *Four Factor Analysis*

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

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

SLATS did the following:

1. Inserted a copy of **SLATS's** planning area LEP data at the end of this Title VI/ADA plan. This data was found at the US Census Bureau website
<https://data.census.gov/cedsci/table?q=B16001&g=0500000US17201,55105&tid=ACSDT5Y2015.B16001&hidePreview=true>
2. Analyzed the LEP demographic data for **SLATS's** planning area by calculating the *Safe Harbor Threshold* for the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the planning area.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) **SLATS** must provide translation of vital documents in written format for the non-English users.

⁵ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

- ii. Examples of written translation of vital documents include the Nondiscrimination policy statement, Complaint Procedure and Complaint Form.
3. Explained the results of the analysis of the LEP data in the demographic section of the *Four Factor Analysis*.

Factor 2: Frequency: Identifies the frequency staff encounters LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP.

The summary below discusses the frequency with which **SLATS** staff, and/or its consultants encounter LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **SLATS** staff persons are encouraged to use LEP resource materials to assist LEP persons.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

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

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods **SLATS** uses to provide outreach to LEP persons as well as train staff on Title VI/ADA and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, **SLATS** addresses the following elements:

- Item #2:** A description of how language assistance services are provided by language
- Item #3:** A description of how LEP persons are informed of the availability of language assistance service
- Item #4:** A description of how the language assistance plan is monitored and updated
- Item #5:** A description of how employees are trained to provide language assistance to LEP persons

And, any additional information deemed necessary.

SLATS – Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1 – Demography

The US Census Bureau (*Table B16001, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older, 2015 ACS 5 Year Estimates*) reports there are numerous languages spoken

in the **SLATS** planning area. For purposes of this analysis we included all of Rock County in Wisconsin and Winnebago County in Illinois which *Table B16001* estimates have a combined population of 422,962. Some of these languages include Spanish, Vietnamese, other Indo-European and German. After English, the second largest language group overall is Spanish.

The Safe Harbor Threshold was calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the service area geographies. 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.

According to Census Table B16001 noted above, an estimated 12,992 persons within both Rock County and Winnebago County combined have identified themselves as Spanish speaking and “speaks English less than very well.” With the margin of error, this number might be as high as 14,104, a little over 3% of the total 2-county population. This is by far the highest LEP group identified and the focus of this analysis.

Taking a closer approximate look at the **SLATS** planning area only, as opposed to the 2-county area, the **SLATS** planning area is approximately 68,907 based on the 2010 Census. LEP data can be approximated for the **SLATS** planning area, and it is estimated that around 3,000 Spanish-speaking LEP individuals reside within **SLATS**, or about 4% of the population. As such, **SLATS** is required to provide written translation of vital documents in Spanish. It is worth noting that Census Table B16001 noted above estimates the City of Beloit, WI alone has about half the overall population of **SLATS** at 34,414. With the margin of error it could be as low as 34,126 (for calculation purposes). Table B16001 shows an estimated 2,237 persons in the City of Beloit have identified themselves as Spanish speaking and “speaks English less than very well.” With the margin of error, this number might be as high as 2,644 pushing the potential number of Spanish-speaking Beloit residents that speak English “less than very well” to more than 7%.

SLATS provides translations to key and critical documents in Spanish, including the Non-discrimination Notice, the Complaint Procedure and the Complaint Form. **SLATS** also provides information in Spanish on all public notices and agendas indicating who to contact for more information if there is interest in participating in the transportation planning process, and if language assistance is needed. **SLATS** has also translated community surveys into Spanish for planning studies, particularly transit-related studies.

In the future, if **SLATS** meets the Safe Harbor Threshold for any other language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

SLATS tracks the number of encounters with LEP persons and considers adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations in the **SLATS** planning area. The *Log of LEP Encounters* is a tool to help track LEP encounters.

Log of LEP Encounters

SLATS staff has reviewed the frequency it has, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits and requests for language assistance or translated materials. Through 2019, **SLATS** had no requests for interpreters or translated documents. Nonetheless, **SLATS** has published vital Title VI documents into Spanish, and provides information in Spanish in all public notices and **SLATS** meeting agendas on how individuals interested in participating in the transportation planning processes can contact **SLATS**.

SLATS staff is trained on what to do when they encounter a person that speaks English less than very well. **SLATS** will track the number of encounters and consider making adjustments as needed to outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations in the **SLATS** planning area.

If ever a language barrier were to exist, **SLATS** would work to provide a reasonable accommodation. The “I Speak” Language Identification Card listed below is a document that can be used by **SLATS** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of **SLATS’s** planning area. The languages included below represent many of the LEP persons within **SLATS** planning area.

“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 говорим српски	Serbian
	میں نے اردو بولتے ہیں	Urdu
	Ja mówię po polsku	Polish
	ฉันพูดไทย	Thai
	Io parlo italiano	Italian
	Govorim hrvatski	Croatian

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

Factor 3 – Importance

SLATS understands an LEP person with language barrier challenges can also face difficulties obtaining health care, education, access to employment, healthy foods, recreational services and socialization. A transportation system is a key link to connecting LEP persons to these essential services. This includes access to public transit and non-motorized transportation options such as robust bicycle and pedestrian networks.

SLATS's assessment of critical needs has and will continue to include contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to LEP populations.

Factor 4 – Resources and Costs

Even though **SLATS** does not have a separate budget for LEP outreach, it continuously explores ways to implement low cost methods of notifying LEP persons of transportation services. Although not required, **SLATS** provides written translation to key and critical documents in Spanish, including the Non-discrimination Notice, the Complaint Procedure and the Complaint Form. Additionally, public input during the planning process is often obtained through online surveys. **SLATS** has and will continue to provide such surveys in Spanish, and work with local organizations to disseminate them to individuals that may be interested in participating.

SLATS recognizes that in addition to Spanish-speaking LEPs, there are other LEP persons in the planning area. While it is not feasible to provide proactive translations in each language, if requests are made, **SLATS** will attempt assistance. **SLATS** has available the US Census “I Speak” Language Identification Card to help identify specific language barriers and assist with accommodating all individuals.

Other resources available include Spanish-speaking City staff and public service agencies located in Beloit. Two that provide assistance to LEP persons include:

- 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 <https://latinoservices.org/>

Lastly, online resources such as Google Translate can assist with the translation of documents. The main downside is accuracy, especially for documents with technical jargon. Nevertheless, this is an efficient and economical approach.

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

SLATS will ensure the following measures or resources are in place to provide language assistance services:

- **SLATS** provides information in Spanish on all public notices and agendas indicating who to contact for more information, or if there is interest in participating in the transportation planning process and if they language assistance.
- **SLATS** provides written translation of key and critical documents in Spanish, including the Non-discrimination Notice, the Complaint Procedure and the Complaint Form.
- **SLATS** translates community surveys into Spanish for planning studies, particularly transit-related studies.
- **SLATS** can collaborate with Spanish-speaking City staff and community organizations to provide translation assistance for LEP persons, help with translation of printed and online information and provide educational and outreach opportunities to help improve access for LEP persons.
- When encountering LEP persons directly, as needed **SLATS** staff will use the US Census “I Speak” Language Identification Card or posters to identify the language and communication need of LEP persons. **SLATS** may not be able to immediately accommodate or assist Individuals self-identifying as persons not proficient in English, but will seek means to assist the individuals at later times or in future meetings.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service
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SLATS does the following to inform LEP persons of the availability of language assistance services:

- ✓ Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed
- ✓ Utilize bilingual speaking persons and tools available to assist with the development of bilingual outreach material
- ✓ Collaborate with public transit agencies on outreach efforts
- ✓ Develop and maintain cooperative relationships with key agencies that serve LEP populations in the area or region. These may include but are not limited to:
 - The Stateline Literacy Council (SLC)
 - The Latino Service Providers Coalition (LSPC)

These entities and others can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs. **SLATS** will continue to use and expand these relationships as well as relationships with other community organizations to gather input from LEP persons and to foster outreach on opportunities to participate in the transportation planning process.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated
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SLATS ensures Title VI-ADA requirements are met. **SLATS** records updates and reviews to its Title VI-ADA plan in the *Policy Updates-Activity Log* section of the Title VI-ADA plan.

On an ongoing basis, **SLATS** assesses changes in demographics and reviews LEP policies and procedures, including but not limited to monitoring requests received for interpreters or translations, complaints filed by LEP person or needs identified through community outreach activities.

SLATS will evaluate relevant information to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons. If it is found that service to LEP persons is expanding, **SLATS** may modify the implementation plan as needed in order to ensure meaningful access by previously underserved LEP persons. The LEP Plan will be reviewed regularly and updated at a minimum every three years, as part of **SLATS's** Title VI Plan update.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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SLATS is oriented on the principles of Title VI/ADA and **SLATS's** Language Assistance Plan. Any new employees will be provided guidance on providing language assistance as needed to LEP persons.

SLATS will ensure its staff is educated on Title VI and ADA requirements, specifically complaint procedures and LEP provisions to identify necessary actions designed to best meet the language needs of individual.

On a regular basis (annually), if relevant, **SLATS** will coordinate with BTS and SMTD to discuss any needed updates to each agency's Language Assistance Plans and Title VI Plans.

Minority Representation Information⁶

A. Minority Representation Table

The table below depicts US Census Bureau data on race and Hispanic populations for the **SLATS** MPA. 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.

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

B. Efforts to Encourage Minority Participation

SLATS is governed by a Policy Board consisting of elected officials or designees of its member agencies. Representation is not determined by SLATS and 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.

⁶ While it does not at this time, if SLATS had transportation-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by SLATS, Title VI regulations require SLATS to provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

Minority Representation Data Collection Form⁷

To: *(applicable SLATS appointed Committee Members)*

Date: _____

Dear Member,

As SLATS is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards selected by SLATS.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for SLATS to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a committee under the jurisdiction of, and in which members are appointed by SLATS, we invite members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI and ADA regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

___ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

___ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

___ *Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

___ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

___ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

⁷ This form is an optional tool SLATS may use to gather information on the racial composition of applicable SLATS appointed committee members for the purposes of meeting the Title VI/ADA plan requirements.

Facility Location Equity Analysis

*(For recipients constructing a facility)
(Not applicable to SLATS)*

Fixed Route Service Standards

*(For all Fixed Route Transit Providers)
(Not applicable to SLATS)*

Fixed Route Service Policy

*(For all Fixed Route Transit Providers)
(Not applicable to SLATS)*

MPO Demographic Data, Analysis and Procedures

(For MPOS only)

In addition to Appendices 1-8 (and Appendices 10 and 11, if the Metropolitan Planning Organization (MPO) is a provider of fixed route public transportation), the MPO is also required to include the elements listed below:

- a. **A demographic profile of the metropolitan area that includes identification of the locations of minority populations in aggregate.**

This information is detailed in Table 1 at the end of this section. Note that MPA-wide, Black or African American individuals comprise the largest minority race at just over 9%. That percentage is nearly 15% in the City of Beloit. The next highest single minority race in the MPA is Asian, at 1.1% (slightly higher in South Beloit at 1.6%), however individuals that are more than one race make up 2.4% of the population (slightly higher in Beloit at 3%). The majority of these individuals are White and African American.

Hispanic individuals of all races make up a significant portion of the population at 8,296 individuals or 12% of the MPA population, and just over 17% of the population of the City of Beloit, or 6,332 persons. The next highest population of Hispanic individuals resides in South Beloit at 608.

Lastly, note that the overall minority population in the MPA (including Hispanic persons) is just over 25%. More locally, with the exception of the City of Beloit, the various municipalities are less than 25% with South Beloit being the second highest at 16%. The City of Beloit has a Hispanic population of about 17% and an overall minority population including Hispanic persons at just over 36%. With more than 1 in 3 individuals in the City of Beloit being a minority (and 1 in 4 in the MPA), SLATS will continuously strive to consider and address the mobility needs of minorities, 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.

b. **A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.**

This information helps ensure 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 minority populations to participate fully in the process.

SLATS identifies and considers the mobility needs of minority populations within the planning process, particularly related to transit and bicycle/pedestrian planning.

For transit, the communities within SLATS provide a relatively high level of public transit service. 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 minority populations. BTS also subcontracts with Rock County Specialized Transportation (RCST) to provide curb-to-curb paratransit services for those persons with special mobility limitations who are unable to use the fixed route services. BTS also cooperates with the Janesville Mass Transit System to provide express bus service between the two communities.

On the Illinois side, the Stateline Mass Transit District (SMTD) provides demand-response public transit service 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 interconnects with the services offered by the Beloit Transit System to the north and the Rockford Mass Transit District to the south.

The above mass transit providers have been active participants in the SLATS planning process for years, and SLATS has collaborated on special studies/TDPs with both SMTD and BTS which include extensive public outreach efforts, including to minority populations. Some outreach methods to gain wider input in planning processes from minority and LEP populations include pop-up meetings at locations around the community, on-board and online surveys in English and Spanish, focus groups with community agencies, organizations and participants, and traditional outreach through public notices and meetings. SLATS also collaborates with transit providers in preparing for their triennial reviews and in the preparation of their Title VI plans. Transit planning processes strive to include ample opportunity for public input, particular from minority and low-income populations, who may rely on public transit for much of their transportation needs. Additionally, proposed street improvements are viewed and weighed with respect to the area's transit systems, routes and services. SLATS recognizes that not everyone drives, or has access to an automobile, and many rely on transit and non-motorized facilities for daily transportation needs. Lastly, the SLATS TIP includes a number of projects specifically related to transit assets, and SLATS annually works with BTS and SMTD through the TIP process to plan and program projects.

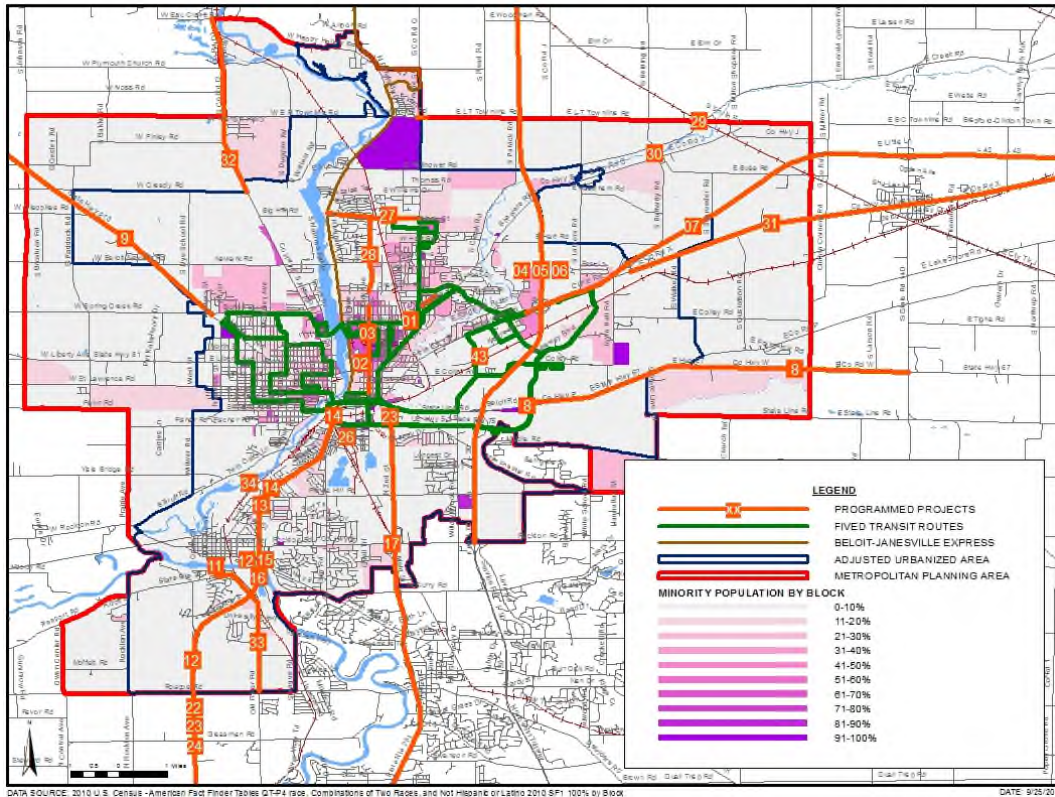
Similarly, for bicycle and pedestrian planning, SLATS identifies and considers the mobility needs of minority populations within the planning process. The SLATS Long Range Transportation Plan has a comprehensive bike and pedestrian element, and was created with input gathered at numerous stakeholder and public meetings. These include community service organizations and participants such as Community Action and Latino Service Provider Coalition. The bike and pedestrian plan contains an extensive equity analysis to ensure that recommended improvements are distributed equitably throughout the MPA. 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 and environmental 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). Typically the annual TIP approved by SLATS contains one or more significant bicycle and/or pedestrian facility improvements.

As SLATS develops its TIP (and Long Range Transportation Plan), maps and demographic analyses are used to evaluate all projects with respect to the location of the area's minorities and low-income concentrations. This helps ensure equitable distribution of facilities and services and that no disparate impacts in the provision of services exist.

- c. **Demographic maps that overlay the percent minority and non-minority populations as identified 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, including Federal funds managed by the MPO.**

The following map from the SLATS 2021-2024 TIP shows the percent minority population by block within the SLATS MPA and AUA along with proposed fixed transit routes and all programmed projects in the TIP. 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).

Figure 1 - SLATS Demographics and 2021-2024 Programmed Projects



Minority populations live throughout the SLATS MPA, particularly in the City of Beloit, with the highest densities on the near east side in the Merril neighborhood, approximately bound by Henry Avenue, Prairie Avenue, White Avenue and Park Avenue, where most blocks exceed 50% minority. State and federal funding for public transportation is focused on these neighborhoods to provide convenient access to transportation for residents, as well as destinations throughout the community for employment, healthcare, school and shopping.

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.

When transportation improvements are less regional and more localized, it is important that minority neighborhoods are provided a fair proportion of beneficial transportation improvements as opposed to concentrating transportation improvements in non-minority 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 minority 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.

Regarding funding for projects contained in the current 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 minority populations, at least with major roadway projects where little Federal or State funding is determined locally. To illustrate:

- ✓ 81.3% of new Federal funds for all projects in SLATS are designated for roadway and bridge projects, with an additional 11.8% for safety projects (including local and district wide). The vast majority of these projects are determined more 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 2021-2024 TIP and does not include federal funding programmed prior to 2021 for projects that may still be continued in the current TIP.

- ✓ New (2021 and later) federal funding for standalone bike and pedestrian facilities in SLATS is currently 0% percent. However, the 2021 TIP does include new bicycle facilities funded through the State and local government including the Park Avenue Bike Lanes Project in 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 2021-2024 TIP and does not include federal funding programmed prior to 2021 for projects that may still be continued in the current TIP. That said, federal bicycle and pedestrian funding in SLATS is minimal, particularly compared to roadways.

- ✓ Transit funding in SLATS makes up about 7.0% 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. Similarly to bicycle and pedestrian facilities, the importance to those who rely on public transit as a primary means of transportation to school, work, shopping or health care (particularly if auto or other means is not readily available) is significant. 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 difficult, but even so, Beloit Transit and SMTD continually look for ways to expand, improve and coordinate service. For instance, BTS is finalizing updates to the fixed route system to improve coverage, frequency (from 40 to 30 minutes) and access to employment centers such as area business parks. 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. SLATS annually works with BTS and SMTD through the TIP process to plan and program projects. In addition to transit operations, the current TIP includes 2 new buses for BTS and 3 for SMTD to replace aging fleet, maintain service levels and ultimately support State targets related to vehicle useful life. Additionally, the BTS Operations Facility roof was programmed in the TIP for replacement, and is scheduled to be completed in 2020. Likewise, a number of capital improvements are programmed in the TIP for BTS including the fuel system, bus wash, transit garage facility and bus technology upgrades. Not only are these replacements badly needed, adequately maintaining transit facilities has a direct impact on not only supporting State targets, but each transit agency's ability to serve the community.

- d. **Analysis of the impacts identified in (c) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.**

Overall there is no evidence of discrimination or disparate impacts on the basis of race, color or national origin in the SLATS MPA. Roadway projects programmed are dispersed and generally serve the entire community including minority populations. This dispersion of projects indicates that no single area or population group is receiving the benefits of or the adverse effects of roadway improvements. An exception is the work related to the Interstate 39/90 expansion. These projects (particularly the Interstate expansion) are of regional significance that cannot be compared to the others and must be evaluated by the State of Wisconsin.

Fixed-route transit services are prevalent in the denser urban areas of Beloit and effectively serve minority and low-income areas. Additionally, paratransit or demand-response services are available in the MPA.

Lastly, while there are certainly areas within the MPA that have larger minority populations, it is worth noting a significant degree of racial and ethnic integration existing in the MPA. While many minorities are located in the older, more densely populated parts of the MPA, a large number of non-minority persons also reside in these areas. This does not preclude the potential of having a disparate impact on EJ populations, only that such impact would likely affect a significant number of non-minority populations as well, reinforcing the idea that such impacts are not intended or discriminatory.

Notes:

- ✓ If the MPO is a direct recipient, the MPO will be required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).

- ✓ All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI/ADA compliance.

TABLE 1 - 2010 Race and Ethnicity of SLATS MPA by Selected Municipality

PLACE	TOTAL POPULATION BY PLACE	% BY PLACE	TOTAL MINORITY POPULATION BY PLACE (INCLUDES HISPANIC POPULATION)	% BY PLACE	HISPANIC 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 БЕЛОIT	36,966	53.6%	13,481	36.5%	6,332	17.1%	23,485	63.5%	5,440	14.7%	114	0.3%	409	1.1%	9	0.0%	53	0.1%	1,124	3.0%
TOWN OF БЕЛОIT	7,662	11.1%	1,174	15.3%	511	6.7%	6,488	84.7%	415	5.4%	20	0.3%	66	0.9%	2	0.0%	13	0.2%	147	1.9%
TOWN OF TURTLE	2,388	3.5%	161	6.7%	53	2.2%	2,227	93.3%	63	2.6%	3	0.1%	14	0.6%	0	0.0%	2	0.1%	26	1.1%
TOWN OF ROCK	1,712	2.5%	222	13.0%	143	8.4%	1,490	87.0%	49	2.9%	3	0.2%	7	0.4%	0	0.0%	3	0.2%	17	1.0%
CITY OF SOUTH БЕЛОIT	7,785	11.3%	1,249	16.0%	608	7.8%	6,536	84.0%	310	4.0%	16	0.2%	128	1.6%	3	0.0%	4	0.1%	180	2.3%
VILLAGE OF ROCKTON	7,685	11.2%	584	7.6%	278	3.6%	7,101	92.4%	101	1.3%	9	0.1%	84	1.1%	1	0.0%	5	0.1%	106	1.4%
ROCKTON TOWNSHIP	3,181	4.6%	425	13.4%	321	10.1%	2,756	86.6%	70	2.2%	0	0.0%	7	0.2%	0	0.0%	0	0.0%	27	0.8%
VILLAGE OF ROSCOE	6	0.0%	0	0.0%	0	0.0%	6	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ROSCOE TOWNSHIP	1,522	2.2%	85	5.6%	50	3.3%	1,437	94.4%	5	0.3%	1	0.1%	16	1.1%	0	0.0%	0	0.0%	13	0.9%
TOTAL	68,907		17,381.00		8,296		51,526		6,453		166		731		15		80		1,640	
PERCENT OF TOTAL	100.0%	100.0%	25.2%		12.0%		74.8%		9.4%		0.2%		1.1%		0.0%		0.1%		2.4%	

DATASOURCE: U.S. Census - American Fact Finder Tables QT-P4 Race, Combinations of Two Races, and Not Hispanic or Latino:2010 SF1 100% by Block.

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

Note: This is a modified view of the original table produced by the U.S. Census Bureau. This download or printed version may have missing information from the original table.

Winnebago County, Illinois			Rock County, Wisconsin		
Label	Estimate	Margin of Error	Estimate	Margin of Error	
▼ Total:	272,105	±40	150,857	*****	
Speak only English	236,092	±1,410	138,391	±727	
▼ Spanish or Spanish Creole:	24,066	±856	9,235	±576	
Speak English "very well"	14,902	±930	5,409	±518	
Speak English less than "very well"	9,164	±655	3,826	±459	
▼ French (incl. Patois, Cajun):	449	±156	250	±90	
Speak English "very well"	367	±133	226	±87	
Speak English less than "very well"	82	±62	24	±26	
▼ French Creole:	0	±26	7	±11	
Speak English "very well"	0	±26	7	±11	
Speak English less than "very well"	0	±26	0	±20	
▼ Italian:	650	±214	59	±45	
Speak English "very well"	349	±116	35	±29	
Speak English less than "very well"	301	±186	24	±22	
▼ Portuguese or Portuguese Creole:	23	±27	8	±11	
Speak English "very well"	23	±27	2	±4	
Speak English less than "very well"	0	±26	6	±10	
▼ German:	652	±189	501	±129	
Speak English "very well"	444	±151	425	±117	
Speak English less than "very well"	208	±125	76	±49	
▼ Yiddish:	0	±26	0	±20	
Speak English "very well"	0	±26	0	±20	
Speak English less than "very well"	0	±26	0	±20	
▼ Other West Germanic languages:	3	±5	199	±161	
Speak English "very well"	3	±5	192	±160	
Speak English less than "very well"	0	±26	7	±12	
▼ Scandinavian languages:	215	±90	126	±68	
Speak English "very well"	195	±84	119	±66	
Speak English less than "very well"	20	±18	7	±11	
▼ Greek:	123	±90	44	±50	
Speak English "very well"	98	±87	44	±50	
Speak English less than "very well"	25	±19	0	±20	
▼ Russian:	396	±315	51	±45	
Speak English "very well"	266	±279	35	±38	
Speak English less than "very well"	130	±134	16	±26	
▼ Polish:	1,031	±418	68	±31	
Speak English "very well"	586	±211	57	±36	
Speak English less than "very well"	445	±235	11	±14	
▼ Serbo-Croatian:	1,351	±446	101	±115	
Speak English "very well"	688	±259	101	±115	
Speak English less than "very well"	663	±268	0	±20	
▼ Other Slavic languages:	71	±45	26	±27	
Speak English "very well"	43	±33	21	±25	
Speak English less than "very well"	28	±27	5	±8	
▼ Armenian:	0	±26	7	±10	
Speak English "very well"	0	±26	7	±10	

Table Notes

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

Survey/Program:

American Community Survey

Universe:

Population 5 years and over

Year:

2015

Estimates:

5-Year

Table ID:

B16001

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

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

Explanation of Symbols:

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

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

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

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

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

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

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

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

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

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

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

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

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

Tell us what you think.

Provide feedback to help make American Community Survey data more useful for you.

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