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## **TITLE VI PLAN**

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## **A. Plan Statement**

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

SHORELINE METRO is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

This plan was developed to guide Shoreline Metro in its administration and management of Title VI-related activities.

### Title VI Coordinator Contact information

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## **B. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in all Shoreline Metro facilities and on revenue vehicles. The name of the Title VI coordinator is available on the Shoreline Metro website, at [www.shorelinemetro.com](http://www.shorelinemetro.com). Additional information relating to nondiscrimination obligation can be obtained from the Shoreline Metro Title VI Coordinator. During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Shoreline Metro expectations to perform their duties accordingly. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix G).

## **C. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from Shoreline Metro where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

## **D. Record Keeping**

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

## **E. Title VI Complaint Procedures**

### **How to file a Title VI Complaint?**

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

1. Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
2. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
3. Other information that you deem significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with SHORELINE METRO at the following address:

Shoreline Metro  
608 S Commerce Street  
Sheboygan, WI 53081

NOTE: SHORELINE METRO encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

Complaints may also be filed through the website at [www.shorelinemetro.com/file-a-complaint](http://www.shorelinemetro.com/file-a-complaint).

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

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by SHORELINE METRO will be directly addressed by the SHORELINE METRO. SHORELINE METRO shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, SHORELINE METRO shall make every effort to address all complaints in an expeditious and thorough manner.

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

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

SHORELINE METRO will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from SHORELINE METRO, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

*Once sufficient information for investigating the complaint is received by SHORELINE METRO, a written response will be drafted subject to review by the transit's attorney. If appropriate, a SHORELINE METRO attorney may administratively close the complaint. In this case, SHORELINE METRO will notify the complainant of the action as soon as possible.*

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

## **F. Limited English Proficiency (LEP) Plan**

### **Introduction and Purpose**

This LEP Four Factor Analysis and Language Assistance Plan has been prepared to meet Federal Transit Administration (FTA) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin. As a subrecipient of FTA funds, Shoreline Metro has pledged to take reasonable steps to

provide meaningful access to its transit services for persons who either (1) do not speak English as their primary language, and/or (2) have a limited ability to read, speak, write or understand English. The FTA refers to these individuals as Limited English Proficient (LEP) persons.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Shoreline Metro, which receives federal assistance through the U.S. Department of Transportation (USDOT).

The USDOT's FTA Office of Civil Rights publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to LEP Persons – A Handbook for Public Transportation Providers" was utilized in the preparation of this plan.

### **Plan Summary and Contents**

Shoreline Metro has developed this *LEP Four Factor Analysis and Language Assistance Plan* to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by the transit operation. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and/or have limited ability to read, speak, write or understand English.

Contents of the plan include the following:

- A needs assessment based on the four factor analysis;
- How to identify LEP persons who may need language assistance;
- Identification of ways in which language assistance may be provided;
- Identification of staff training that may be required;
- Procedures to notify LEP persons that assistance is available; and
- Procedures to monitor and update the plan.

### **LEP Needs Assessment – The Four Factor Analysis**

In order to prepare this plan, Shoreline Metro completed the USDOT four factor LEP analysis, which assesses the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of Shoreline Metro.
2. The frequency with which LEP persons come into contact with Shoreline Metro programs, activities or services.
3. The nature and importance of programs, activities or services provided by Shoreline Metro in the lives of LEP persons.
4. The resources available to Shoreline Metro for LEP outreach, as well as the costs associated with that outreach.

A summary of the results of the Shoreline Metro four factor analysis is as follows:

**Factor #1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of Shoreline Metro.**

Sheboygan MPO staff reviewed data from the *2013 – 2017 American Community Survey (ACS)*, and determined that 8,484 persons age 5 and older in the Shoreline Metro transit service area (Cities of Sheboygan and Sheboygan Falls and the Village of Kohler) spoke a language other than English; this amounted to about 15.4 percent of the entire service area population age 5 and older (a population of 54,969). Within the transit service area, some 3,195 persons (5.8 percent) had limited English proficiency; that is, they speak English less than “very well.” Of those persons with limited English proficiency, 1,102 (2.0 percent) spoke Spanish, 324 (0.6 percent) spoke other Indo-European languages, 1,697 (3.1 percent) spoke Asian and Pacific Islander languages (primarily Hmong), and 72 (0.1 percent) spoke other languages. Some 531 of 25,161 households in the transit service area (2.1 percent) were considered linguistically isolated households. The Shoreline Metro transit service area is above the “Safe Harbor” threshold of 5 percent or 1,000 persons within any LEP group speaking a given language in the areas of speakers of Spanish and Asian and Pacific Islander languages (primarily Hmong).

Table 1 shows a breakdown of LEP persons and linguistically isolated households for each census tract in the transit service area from the *2013 – 2017 ACS*. Table 1 indicates that Census Tracts 3 and 10 both had between 400 and 500 LEP persons, while Census Tracts 2.01 and 5 each had between 300 and 400 LEP persons. In addition, several Census Tracts (1, 2.02, 4, 8, 9 and 107) each had between 200 and 300 LEP persons. Census Tract 2.01 had the largest percentage of LEP persons (14.7 percent), followed by Census Tracts 5 (11.0 percent) and 10 (7.1 percent).

Table 1 also shows that Census Tract 10 had the largest number of linguistically isolated households (101), while several Census Tracts (2.01, 2.02, 3, 4 and 5) each had between 50 and 100 linguistically isolated households. Census Tract 2.01 had the largest percentage of linguistically isolated households (9.1 percent), followed by Census Tracts 5 (4.4 percent), 10 (3.4 percent) and 2.02 (3.1 percent).

Table 1 indicates that in regard to LEP persons, Spanish was a wholly or partially dominant language in eight Census Tracts, while Hmong was also a wholly or partially dominant language in eight Census Tracts, other Indo European languages were dominant in one Census Tract, and other languages were dominant in one Census Tract. Table 1 also indicates that in regard to linguistically isolated households, Spanish was the dominant language in seven Census Tracts, while Hmong was the dominant language in six Census Tracts, other Indo European languages were dominant in three Census Tracts, and other languages were dominant in one Census Tract.

**Table 1**  
**Limited English Proficient (LEP) Persons and Linguistically Isolated Households**  
**2013 - 2017 American Community Survey (ACS)**

Census Tract	LEP Persons		Predominant Language	Linguistically Isolated Households		Predominant Language
	Number	Percentage		Number	Percentage	
<b>1</b>	217	6.2%	Hmong	7	0.5%	Spanish
<b>2.01</b>	382	14.7%	Spanish	90	9.1%	Spanish
<b>2.02</b>	227	6.1%	Hmong	58	3.1%	Hmong
<b>3</b>	457	6.9%	Hmong	61	2.1%	Hmong/Indo European
<b>4</b>	211	4.9%	Hmong	54	2.8%	Hmong
<b>5</b>	349	11.0%	Hmong	78	4.4%	Hmong
<b>8</b>	256	5.3%	Spanish	38	1.7%	Spanish
<b>9</b>	261	5.5%	Spanish/Hmong	39	1.8%	Spanish/Hmong
<b>10</b>	474	7.1%	Spanish/Hmong	101	3.4%	Spanish
<b>11</b>	134	3.8%	Hmong	0	0.0%	NA
<b>106.01</b>	16	0.3%	Other	14	0.6%	Other
<b>106.02</b>	82	2.2%	Spanish	5	0.3%	Spanish
<b>107</b>	252	3.0%	Spanish	34	1.0%	Hmong/Indo European
<b>108</b>	122	4.0%	Spanish	22	1.7%	Spanish
<b>109</b>	26	0.9%	Spanish	0	0.0%	NA
<b>114</b>	115	4.4%	Indo European	7	0.6%	Indo European

Source: U.S. Bureau of the Census, *2013 - 2017 American Community Survey* (Tables B16004 and S1602), 2018; and Bay-Lake Regional Planning Commission, 2019.

Map 1 shows the degree of LEP persons in the various Census Tracts of the Shoreline Metro transit service area (according to the *2013 – 2017 ACS*), along with the Shoreline Metro route structure.

Map 2 shows the degree of linguistically isolated households in the various Census Tracts of the Shoreline Metro transit service area (according to the *2013 – 2017 ACS*), along with the Shoreline Metro route structure.

**Factor #2: The frequency with which LEP persons come into contact with Shoreline Metro programs, activities or services.**

The LEP population that Shoreline Metro primarily works with mostly speak Spanish. Spanish speaking passengers are primarily located in Census Tracts that surround Sheboygan’s central business district, as well as in most other Census Tracts within the City of Sheboygan. These passengers mainly use transit service for school, shopping, work and personal business, with medical and social/recreational trip purposes also being common. Shoreline Metro transit services provide an important link to this group.

Shoreline Metro assesses and documents the frequency with which LEP individuals come in contact with drivers and staff. Communication between staff and drivers that have contact with LEP individuals is critical and required.

**Factor #3: The nature and importance of programs, activities or services provided by Shoreline Metro in the lives of LEP persons.**

Shoreline Metro considers transit to be an important and essential service for many people living in the transit service area. Shoreline Metro’s overall passenger numbers from January 1, 2018, through December 31, 2018, indicate that the transit operation had higher ridership than it did for the same period in 2017. From January 1, 2017, through December 31, 2017, Shoreline Metro had 529,726 unlinked trips, and from January 1, 2018, through December 31, 2018, Shoreline

Metro had 599,714 unlinked trips, an increase of 13.2 percent. Shoreline Metro does not track LEP passengers separately.

Services provided by Shoreline Metro that are most likely to encounter LEP persons are the fixed-route transit system which serves the general public, and the demand response paratransit system (including ADA paratransit), which serves primarily elderly and disabled persons.

**Factor #4: The resources available to Shoreline Metro for LEP outreach, as well as the costs associated with that outreach.**

Shoreline Metro has a budget for marketing and advertising, a portion of which involves marketing to or communicating with LEP persons in their language about transit services that are available to them. This may include funding for translation services, brochures, flyers, posters, newspaper advertising, radio advertising, website improvements, etc.

Shoreline Metro has access to some Spanish and Hmong speaking staff within its driver pool. Shoreline Metro will also have access to copies of the language identification guide “I Speak” pamphlets from the U.S. Department of Justice website for use in determining an unknown language.

Based on the above LEP needs assessment and four factor analysis, Shoreline Metro developed its LEP language assistance plan as outlined in the following sections.

**How Shoreline Metro Staff May Identify an LEP Person Who Needs Language Assistance**

As stated above, data from the *2013 – 2017 American Community Survey (ACS)* show that Spanish and Hmong speaking LEP persons are the primary groups requiring language assistance. This information can also be used to identify concentrations of LEP persons within the service area.

Higher percentages of LEP persons can also be identified more accurately by Census Tracts, as was shown in Map 1. In general, there are higher populations of LEP persons in the City of Sheboygan, particularly on the north, northwest, west, southwest and south sides of the city, as well as in two Census Tracts adjacent to the central business district. Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures.

There are several other measures that can be taken to identify persons who may need language assistance, including the following:

- Examination of records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When Shoreline Metro sponsors open houses, public meetings or other events, set up a sign-in table and have a staff member greet and briefly speak with each attendee, in order to informally gauge each attendee’s ability to speak and understand English.
- Have language identification flashcards from the U.S. Bureau of the Census available at Shoreline Metro events near the registration table. Persons who identify themselves as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but this will assist Shoreline Metro in identifying language assistance needs for future events.
- Vehicle operators and other front-line staff (such as dispatchers and ride schedulers) will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted in the third quarter of each year.

### **Language Assistance Measures**

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Shoreline Metro staff will respond to LEP persons, whether in person, by telephone or in writing, including the following:

- The Shoreline Metro Title VI Policy and LEP Language Assistance Plan will be posted on the Shoreline Metro website, [www.shorelinemetro.com](http://www.shorelinemetro.com).
- Shoreline Metro has added an online translation service to its website, and will include updates to this service on its website if and when they become available.
- The Title VI Complaint form and Contact Form on the website can be translated to accommodate LEP individuals.
- When there is a rapid need for an interpreter, in person or on the telephone, Shoreline Metro staff will work to determine the language of the LEP person and then access local interpreters as needed.
- A “How To” Guide specific for Spanish-speaking individuals is available in print or digital format.

Critical and vital documents will be translated into Spanish. These documents are defined as those documents without which a person would be unable to access services and include:

- Title VI Notice;
  - Posted on all revenue service vehicles;
  - Posted in all customer service locations;
  - Posted on the Shoreline Metro website;
- Interior bus notifications including route changes, detours and rider alerts;
- Interior bus notifications including safety and system information;
- ADA Paratransit application for services;
  - Posted on the Shoreline Metro website;
  - Available in print format as well;

Other service documents including route guides can be translated upon request from an individual.

Shoreline Metro has limited staff among the ranks of its drivers who speak Spanish or Hmong. As Shoreline Metro has openings in its driver pool and in its supervisory staff, attempts will be made to recruit staff with a working knowledge of Spanish or Hmong. Other techniques that may be employed as short-term measures may include asking for assistance from bilingual passengers, and hiring outside professionals to translate many of the items identified above.

### **Staff Training**

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP Language Assistance Plan. Proper training of staff is a key element in the effective implementation of the LEP Language Assistance Plan.

In order to ensure effective implementation of this plan, Shoreline Metro will schedule training at orientations (for new staff) and at periodic staff/driver meetings (for continuing staff) to review the following items:

- Information regarding Shoreline Metro’s Title VI Policy and LEP Language Assistance Plan (including LEP responsibilities);
- Demographic data regarding the LEP population of the transit service area;
- Availability of translated literature regarding Shoreline Metro that can be accessed by LEP persons;
- Description of language assistance services offered to the public;

- Proper use of the language identification flashcards, and specific procedures to be followed when encountering an LEP person;
- Proper documentation of language assistance requests;
- Use of language translation services (office staff only); and
- The responsibility to notify the Transit Director about any LEP person's unmet needs.

At a minimum, these issues will be addressed at meetings on an annual basis. Some of the above issues may be addressed with drivers or with office staff, as needs are determined.

### **Procedures to Notify LEP Persons that Assistance is Available**

There are several ways that Shoreline Metro plans to notify LEP persons in their own language that language assistance measures (through both oral and written communications) are available, including the following:

- At a minimum, public meeting notices and open house announcements will include a statement affirming that Shoreline Metro will make reasonable accommodations to translate pertinent materials into customer languages, or to provide an interpreter upon request.
- When Shoreline Metro schedules a meeting in which the target audience is expected to include LEP persons, then meeting notices, flyers, agendas, and other literature related to the meeting topic(s) will be printed in the alternative language(s) based on the known LEP population.
- Information will be sent to local organizations that work with LEP persons.
- Notices will be placed in alternative language publications and local access cable TV/radio programs (where they exist) advertising Shoreline Metro transit and paratransit services.
- "Vital documents" will be translated into Spanish and Hmong (where determined to be necessary).

### **Updating and Monitoring of the LEP Language Assistance Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. Therefore, it is important to: (1) consider whether new documents and services need to be made accessible for LEP persons; (2) monitor changes in demographics and types of services; and (3) update the LEP Language Assistance Plan when appropriate. At a minimum, Shoreline Metro will follow the Title VI Program update schedule in updating the LEP Language Assistance Plan. Each update should examine the following:

- How many LEP persons were encountered on an annual basis since the last plan?
- Are existing LEP language assistance activities meeting the needs of LEP persons? Have these activities been effective and sufficient to meet such needs?
- What is the current LEP population of the transit service area?
- Has there been a change in the types of languages where services are needed?
- Have available resources (such as technology, staff and finances) changed? Are Shoreline Metro's financial resources sufficient to fund needed language assistance programs?
- Were any complaints received concerning Shoreline Metro's failure to meet the needs of LEP persons?
- Do staff members understand the policies and procedures within the LEP Language Assistance Plan?
- Has Shoreline Metro fully complied with the goals of this LEP Language Assistance Plan?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to speakers of other languages. Feedback from the LEP community will be sought through outreach events and presentations to determine the effectiveness of the plan in serving the needs of LEP persons. Census data (involving future releases from the American Community Survey) will also be reviewed as they become available to determine changes in the LEP population.

### **Dissemination of the LEP Language Assistance Plan**

Shoreline Metro will post this LEP Language Assistance Plan on its website, [www.shorelinemetro.com](http://www.shorelinemetro.com)(.)

This plan is also available at no cost in English upon request by telephone, fax, mail or in person. LEP persons may obtain copies or translations of the plan upon request.

Any questions or comments regarding this plan should be directed to:

Derek Muench, Director  
 Shoreline Metro  
 608 South Commerce Street  
 Sheboygan, WI 53081  
 Phone: (920) 459-3140  
 FAX: (920) 459-0231  
 E-Mail Address: [Derek.Muench@shorelinemetro.com](mailto:Derek.Muench@shorelinemetro.com)

### **G. Community Outreach**

Shoreline Metro has developed a comprehensive public participation plan to notify the public regarding service changes, service area changes, and changes in the fare structure. Shoreline Metro appreciates and encourages public participation efforts from citizens living within the current service area and beyond.

#### **NOTIFICATIONS**

Shoreline Metro publishes public notices in a variety of ways. Written communications are posted in the local newspapers (when applicable), on the Shoreline Metro website, the Shoreline Metro Facebook page, and internally on all Shoreline Metro revenue vehicles. Capital projects are published in the classified section of the *Sheboygan Press* whenever Shoreline Metro purchases capital projects using state or federal funds.

Press releases are issued for public input sessions for significant route revisions, changes in service, or fare increases. Public input sessions and hearings are hosted by Shoreline Metro on a per-need basis, usually in conjunction with activities provided through route planning by the City of Sheboygan's MPO, Bay-Lake Regional Planning Commission.

Postings are made at least thirty (30) days prior to the date of the public input session. Shoreline Metro also allows for at least a thirty (30) comment period on capital purchases or announced service changes before implementation.

Public input attendance and suggestions are documented in conjunction with the input session. Suggestions, ideas and comments are considered based:

- 1) Feasibility of project;
- 2) Financial capacity of Shoreline Metro; and
- 3) Practicality of implementation (greatest good for the majority),

Comments are evaluated based on these factors and incorporated based on evaluation of the criteria.

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

- *SHORELINE METRO has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities.*
- *Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan).*
- *Transit Commission meetings are open to the public and public participation is encouraged.*

- *The Transportation Improvement Program (TIP) is a planning document that addresses transportation projects and programs, including public transportation. The TIP is prepared and published by Bay-Lake Regional Planning Commission. Public participation and comment is also encouraged. (Please see Appendix B for the Bay-Lake Regional Planning Commission’s Public Participation Plan for the Sheboygan MPO).*
- *Shoreline Metro has a complaint procedure process that encourages customer comments on issues, concerns or questions about Shoreline Metro’s services.*

Federal transit law, as amended by “Fixing America’s Surface Transportation” (FAST) Act (2015), requires that projects selected for under the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) be derived from a coordinated plan. The coordinated plan (first developed in 2016 and amended in 2017 and 2018) involved extensive public outreach and involvement. The next full coordinated plan will be updated in 2020.

**H. Service Standards**

Title VI of the Civil Rights Act of 1964, as amended, as well as subsequent legislation and regulation, seeks to ensure that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The FTA is the agency that provides oversight to Shoreline Metro’s Title VI program.

In October of 2012, the FTA released the most recent update to its Title VI Circular. This circular presents guidance and instructions for recipients of Federal financial assistance to comply with current U.S. Department of Transportation (DOT) Title VI regulations. Changes made in this revision include the addition of several requirements, including the adoption of specific service standards and policies for providers of fixed-route public transportation services, and the policy definitions of what constitutes a major service change, disproportionate burden and disparate impact. Moreover, the updates require the monitoring of these service standards and policies for compliance with Title VI provisions, including disparate-impact and disproportionate-burden effects, with consideration, awareness, and the monitoring results made by the Director of Transit & Parking for the City of Sheboygan and/or the Transit Commission.

TABLE 2 – Fixed Route Service Standards			
FTA Standard	Shoreline Metro Term	Shoreline Metro Definition	Calculation
Vehicle Headway	Frequency/Time Between Buses	Maximum scheduled time interval between buses.	Weekday peak-period and day time hours maximum wait time between buses will be 30 minutes; weekday off-peak times and Saturday times maximum wait time between buses shall be 60 minutes.
On Time Performance (OTP)	On Time Performance	Percent adherence to scheduled service.	Routes shall remain on time 95% of the time during normal circumstances (exempting weather, detours, etc.). On time performance is considered up to 5 minutes after the posted pick up times and never ahead of the posted pick up times.

Service Availability	Population served by Shoreline Metro	Percent of a population living near a Shoreline Metro bus stop.	Population living within ¼ mile of a bus stop divided by the total population in the zone. Shoreline Metro has a standard of 90% (currently 96.5%).
Vehicle Load	Load Factor	Average trips provided per bus during one (1) service hour.	Load factors of 12.00 trips per hour under normal operating circumstances with expected trips per hour to be 11.00-13.00 on an average weekday.

These service standards are specifically mentioned in Shoreline Metro’s 2012-2016 Transit Development Program (TDP) and Chapter 5 of the Update to the Year 2045 Sheboygan Area Transportation Plan (SATP), both prepared by the Bay-Lake Regional Planning Commission. Information on Shoreline Metro’s 2012 – 2016 TDP and the TDP update that is currently under preparation can be found at:

<https://baylakerpc.org/sheboygan-mpo/shoreline-metro-transit-development-program-tdp>

Shoreline Metro has also service policies for amenities and vehicles:

- Shoreline Metro will provide equitable distribution of transit shelters, maps and other resources in buses and at bus stops servicing all transit participating municipalities in the service area.
- Vehicles are assigned by ridership demand. Routes with higher ridership demands will be accommodated by 35 foot coaches with other routes utilizing 29 foot and 35 foot coaches.
- Shoreline Metro will make all its publications, service provisions, maps, policies and updates available on its website (www.shorelinemetro.com) and on its Facebook page ([www.facebook.com/shorelinemetro](http://www.facebook.com/shorelinemetro)).

TABLE 3 – Paratransit Service Standards			
FTA Standard	Shoreline Metro Term	Shoreline Metro Definition	Calculation
Vehicle Load	Load Factor	Average trips provided per bus during one (1) service hour.	Load factors of 2.35 trips per hour under normal operating circumstances with expected trips per hour to be 2.10 to 2.50 on an average weekday.

On Time Performance (OTP)	Schedule Adherence	Percent adherence to scheduled service.	Trips shall not pick up more than 15 minutes early or more than 15 minutes late with 95% of all trips provided within this window.
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Shoreline Metro also has service goals that include:

- A denial rate of 0% (100% of all trips provided within service standards as outlined in the 2014-2018 Paratransit Plan for Shoreline Metro.
- Shoreline Metro will not provide lengthy trips (trip lengths of more than 60 minutes in duration) under normal circumstances (exempting weather, construction/detours, accidents, etc.).

Shoreline Metro has established policies for major service change, disparate impact, and disproportionate burden, as shown in Table 4 below:

TABLE 4 – Major Service Changes*		
Parameters	Shoreline Metro Term	Anticipated Service Change
Span	Change in span of service on a route or routes of 1-hour or more in a single fiscal year (calendar year).	No
Frequency	Change in revenue miles on a route or routes of more than 10% in a single fiscal year (calendar year).	No
Coverage/Availability	Change in availability of route service of more than 10% in a single fiscal year (calendar year).	No
Fares	Change in adult cash fare (increase or decrease).	No

\*All major service changes require a public hearing and approval from the Transit Commission before implementation.

## **Appendix A – Title VI Policy**

The Shoreline Metro Title VI Policy is displayed in all revenue vehicles, at both public facilities for passengers and customers to view and on the Shoreline Metro website, [www.shorelinemetro.com](http://www.shorelinemetro.com). The policy is posted in both English and Spanish. The policy states:

“Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs & activities receiving Federal financial assistance. (42 U.S.C. Section 2000d).

Shoreline Metro is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the Shoreline Metro Title VI Coordinator.

For more information you may visit us at [shorelinemetro.com](http://shorelinemetro.com) & view the “Riders Rights” page by clicking on the Riders Services tab or you may call the Shoreline Metro Title VI Officer at 920.459.3285.”

Further, no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. All employees of the SHORELINE METRO are expected to consider, respect, and observe this policy in their daily work and duties. Citizens wishing to file a Title VI complaint shall do so to the attention of the Director of Transit & Parking. In all dealings with citizens use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

**Appendix B – Sheboygan MPO Public Participation Plan: 2016 Update (Bay-Lake Regional Planning Commission)**

The *2016 Public Participation Plan Update for the Sheboygan Metropolitan Planning Organization (MPO)* was last updated in December 2016. A link to this document can be found at:

[https://baylakerpc.org/application/files/3015/2831/9332/2016\\_mpo\\_public\\_participation\\_plan.pdf](https://baylakerpc.org/application/files/3015/2831/9332/2016_mpo_public_participation_plan.pdf)

Appendix C – TITLE VI COMPLAINT FORM



**TITLE VI  
COMPLAINT FORM**

**SECTION I**

\_\_\_\_\_  
Name Date

\_\_\_\_\_  
Address City State Zip

\_\_\_\_\_  
Phone (H) (C) (W)

Email: \_\_\_\_\_

Accessible Format Requirements? Large Print \_\_\_\_\_ Audio Tape \_\_\_\_\_ TDD \_\_\_\_\_

Other \_\_\_\_\_

**SECTION II**

Are you filing this complaint on your own behalf? Yes \_\_\_\_ No \_\_\_\_

[If you answered "yes" to this question, go to Section III.]

If not, please supply the name and relationship of the person for whom you are complaining:

\_\_\_\_\_

Please explain why you have filed for a third party. \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes \_\_\_\_ No \_\_\_\_

**SECTION III**

Have you previously filed a Title VI complaint with this agency? Yes \_\_\_\_ No \_\_\_\_

**SECTION IV**

Name of agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

**On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint. Please include the basis of the complaint - race, color, or national origin.**

Please sign here: \_\_\_\_\_ Date: \_\_\_\_\_

[Note - We cannot accept your complaint without a signature.]

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**Please mail your completed form to:**

Title VI Coordinator  
Shoreline Metro  
608 S. Commerce Street  
Sheboygan, WI 53081

***Generally, complaints must be filed within 30 days of the alleged act of discrimination. Late filings may lead to a finding of an untimely complaint.***

Appendix D – RACIAL BREAKDOWN OF TRANSIT COMMISSION



**TITLE VI**  
RACIAL BREAKDOWN OF COMMISSION

Shoreline Metro is governed by an authoritative Transit & Parking Commission consisting of nine (9) members, including three (3) elected Common Council members, the Mayor, two (2) City Department Heads, and three (3) Mayoral Appointees. Aldermen are appointed to one (1) year terms, and Mayoral Appointees are appointed to three (3) year staggered terms. The three (3) City Department Heads are standing appointments.

The Transit & Parking Commission meets monthly on the third Tuesday of the month. April has been traditionally reserved for Mayoral appointments, and thus, there is no meeting during the month.

Mayoral appointments have been traditionally local business owners or citizens with transit and parking interests. Some appointments have had an interest in local government and being involved in some capacity. Most appointments have been on a referral basis.

In the past, the Transit & Parking Commission had members of a minority class. Shoreline Metro does encourage women and minorities to apply. Here is the current racial breakdown of the Transit & Parking Commission:

<b>Commission Member</b>	<b>White/Caucasian</b>	<b>Black/African-American</b>	<b>Hispanic</b>	<b>Native American</b>	<b>Asian/Pacific Islander</b>
Mayor	X				
Alderman – Chair of Finance & Personnel		X			
Alderman – Chair of Public Protection & Safety	X				
Alderman – Chair of Public Works	X				
Police Chief	X				
Planning Director	X				
Citizen Appointee #1	X				
Citizen Appointee #2	X				
Citizen Appointee #3	X				

**APPENDIX E – Letter Acknowledging Receipt of Complaint**

Today's Date  
Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against SHORELINE METRO alleging

\_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephone at (920) 459-3140, or write to me at this address.

Shoreline Metro  
Attn: Derek Muench, Director  
608 S Commerce Street  
Sheboygan, WI 53081

Sincerely,

Derek Muench  
Director of Transit & Parking  
Title VI Coordinator  
Shoreline Metro  
(920) 459-3140

**APPENDIX F – Letter Notifying Complainant that the Complaint Is Substantiated**

Today's Date  
Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against SHORELINE METRO alleging Title VI violation has been investigated. (An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

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

Sincerely,

Derek Muench  
Director of Transit & Parking  
Title VI Coordinator  
Shoreline Metro  
(920) 459-3140

**APPENDIX G – Letter Notifying Complainant that the Complaint Is Not Substantiated**

Today's Date  
Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against SHORELINE METRO alleging \_\_\_\_\_ has been investigated. The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

SHORELINE METRO has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated. I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

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

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

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

Sincerely,

Derek Muench  
Director of Transit & Parking  
Title VI Coordinator  
Shoreline Metro  
(920) 459-3140



## KNOW YOUR RIGHTS CONOZCA SUS DERECHOS

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Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs & activities receiving Federal financial assistance. (42 U.S.C. Section 2000d).

Shoreline Metro is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the Shoreline Metro Title VI Coordinator.

For more information you may visit us at [shorelinemetro.com](http://shorelinemetro.com) & view the “Riders Rights” page by clicking on the Rider Services tab or you may call the Shoreline Metro Title VI Officer at 920.459.3285

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Título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación por motivos de raza, color u origen nacional en los programas y las actividades que reciban ayuda financiera federal. (42 USC Sección 2000d)

Shoreline Metro está comprometida con la práctica de no discriminar. Si usted cree que ha sido discriminado, usted puede presentar una queja ante el coordinador de Título VI de Shoreline Metro.

Para más información, se puede visitar nuestro sitio web ([shorelinemetro.com](http://shorelinemetro.com)) y ver la página “Rider Services” (Servicios para Pasajeros), o puede llamar al coordinador de Título VI de Shoreline Metro al 920.459.3285.

**APPENDIX I – Acknowledgement of Receipt of Title VI Plan**

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

\_\_\_\_\_  
Your signature

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

\_\_\_\_\_  
Date