

City of Hartford
Hartford City Taxi - Title VI Plan
Date Adopted: 12/10/19

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).

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

Title VI Coordinator Contact information

City of Hartford
Julie Hanrahan, Title VI Coordinator
109 N. Main Street
Hartford, WI 53027

Title VI Policy Information

Employee Education

Title VI information is disseminated to all City of Hartford employees via the *Employee Education Form* (Attachment A-1) in person or via payroll envelopes. This form reminds employees of the City of Hartford policy statement, and of their Title VI responsibilities in their daily work and duties. City of Hartford will determine how frequently the *Employee Education Form* should be reviewed with its employees.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the City of Hartford 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 Attachment A-2).

Subcontracts and Vendors

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

Record Keeping

Requirement: Grantees shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color, or national origin. This list shall include the date that the investigation, complaint, or lawsuit was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation, lawsuit, or complaint.

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

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

Title VI Public Notification

*Requirement: Recipients and subrecipients need not necessarily refer to “Title VI of the Civil Rights Act of 1964” in their notification to the public, since most of the public is not aware of this provision. Rather, they can fulfill this requirement by **notifying the public that they are committed to providing non-discriminatory service and informing customers how to request more information and how to file a discrimination complaint.***

Recipients and subrecipients that provide transit service shall disseminate this information to the public through measures that can include, but shall not be limited to a posting on the agency’s web site.

Title VI information posters and brochures are prominently and publicly displayed in the City of Hartford facilities and in and/or on revenue vehicles and on the City of Hartford’s website: ci.hartford.wi.us.

For sample language see Attachment B.

Title VI Complaint Procedure

Requirement: Recipients and subrecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to the public upon request.” States and subrecipients do not need to develop separate procedures for investigating and resolving Title VI complaints beyond what procedures have already been established to respond to complaints of discrimination filed on basis not covered under Title VI or procedures to respond to non-civil rights related complaints. However, there should be a system in place whereby it can be identified which, if any, Title VI complaints have been filed.

The information in this section is an example of a possible Title VI complaint procedure. For sample forms see Attachment C.

How to file a Title VI Complaint?

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

City of Hartford
Julie Hanrahan, Title VI Manager
109 N. Main Street
Hartford, WI 53027

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 City of Hartford will be directly addressed by the City of Hartford. City of Hartford shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, City of Hartford shall make every effort to address all complaints in an expeditious and thorough manner.

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

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

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

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

City of Hartford will send a final written response letter (Attachment C) to the complainant.

In the letter notifying complainant that the complaint is not substantiated (Attachment C), 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 Recipient/Agency Name and/or 2) file a complaint externally with the Federal Transit Administration. 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 City of Hartford, a written response will be drafted subject to review by the transit's attorney. If appropriate, A City of Hartford attorney may administratively close the complaint. In this case, City of Hartford 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, Region V
Attention: Title VI Program Coordinator
200 West Adams Street, Suite 320
Chicago, IL 60606

Investigations/Complaints/Lawsuits

The City of Hartford has had no complaints or lawsuits on file. There have been not any investigations.

Limited English Proficiency (LEP) – Public Participation Requirement

Requirement: Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.

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

We have engaged the public in its planning and decision-making processes. The Public Works Committee which oversees the City Taxi holds monthly meetings as does the Common Council. The City of Hartford holds annual budget meetings which are open to the public and televised. A public notice is published in the City's local newspaper which includes the agenda, and is published twice prior to this meeting with the last publication being 1 week prior. This public notice is also posted at other city owned buildings which include, city hall, library and police department. The 2nd item on the agenda offers the opportunity for any public input. The city will always consider any comment or concern from the public when decisions regarding changes to the taxi service and/or fares are made. Should there be any special accommodations needed a person may contact the City Clerk to make prior arrangements.

Board Meetings. The Public Works committee holds monthly meetings and the public is invited to attend. The Common Council also holds monthly meetings that would address any issues that may arise with the Taxi Service.

Customer Complaint Process. Citizens may call 262-673-8204 to lodge a complaint or comment. All complaints/comments are input into a database and then distributed to the relevant manager who researches the complaint and responds back to the citizen.

Bilingual Outreach. The City of Hartford has an account with Language Line Services if there would ever be a need for a translator.

In addition, we submit to the Wisconsin Department of Transportation annually an application for funding. The application requests funding for transit financial assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

Limited English Proficiency (LEP) – Meaningful Access Plan

Requirement: Recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

Ref: U.S. Census Bureau American Fact Finder Data – 2017 (Latest Available – Spanish/Other Languages)

| | Population: City of Harford Age 5 and older: 13,525 (2017) | % of Population |
|---|---|------------------------|
| Speak only English | 13,016 | 96.2% |
| Spanish or Spanish Creole | | |
| Speak English less than “very well” | 57 | 0.42% |
| Other Indo-European languages | | |
| Speak English less than “very well” | 47 | 0.35% |
| Asian and Pacific Island languages | | |
| Speak English less than “very well” | 38 | 0.28% |

Ref: U.S. Census Bureau American Fact Finder Data – 2015 (Latest Available – Specific Languages Spoken)

| | Population: City of Harford Age 5 and older: 13,223 (2015) | % of Population |
|-------------------------------------|---|------------------------|
| Italian | | |
| Speak English less than “very well” | 9 | .07% |
| French (incl. Patois, Cajun) | | |
| Speak English less than “very well” | 11 | .08% |
| Serbo-Croatian | | |
| Speak English less than “very well” | 24 | .18% |
| Hmong | | |
| Speak English less than “very well” | 38 | .29% |

| | | |
|--|---|------|
| <i>Japanese</i> | | |
| <i>Speak English less than "very well"</i> | 8 | .06% |

Factor 1 – Number of LEP Persons in Service Region

The City of Hartford operates a shared-ride taxi service. The service area for the City of Hartford is 8.1659 square miles. The U.S. Census Bureau American Fact Finder Data reports in 2017 that the estimated population for City of Hartford is 13,525. The largest LEP population is Spanish or Spanish Creole which represents 0.42% (57) of the population. The City of Hartford is below the Safe Harbor threshold of 5% or 1,000 individuals which would trigger translation services and other requirements.

Factor 2 – Frequency

The City of Hartford taxi service provides an average of 1,499 taxi rides per month. While no formal data has been collected, the Transportation Superintendent indicated rides are given to LEP persons approximately 14 times a month. With the average of 1,499 rides provided a month, that frequency would be approximately .93% of total rides. Our taxi has an open door policy and will provide rides to any person who request service. If an individual has speech limitations the driver/dispatcher will work with the Transportation Superintendent and the City of Hartford if needed, to ensure the individual receives access to the transit service.

Factor 3 – Importance

The City of Hartford understands an LEP person with a language barrier challenges also faces many difficulties obtaining healthcare, education or access to employment. A public transit system is key link to connect LEP persons to these essential services. A majority of our taxi patron are senior citizens. Having a taxi service provides this type of person a sense of independence to be able to go to doctor appointments, grocery shopping or just to attend social events. The same goes for our disabled patrons. We also connect people to their jobs. It is a very vital service that is well used in the City of Hartford.

Factor 4 – Resources

Any need for LEP assistance in other languages will be periodically reviewed. We do not have a budget for outreach at this time, but if the need for it changes, we will look into creating a budget to address the needs for the LEP community.

Description of how we will provide language assistance services by language.

At this time, the City of Hartford does not have a bilingual person on staff. If our language plan changes we would reach out to the community being, the hospital or other organizations to help assist us to reach these goals.

Description of how we will provide notice to LEP persons about the availability of language assistance.

At this time based upon the Four-Factor analysis the City of Hartford does not feel it needs to provide language assistance. During our LEP plan review if the Safe Harbor threshold would change we would certainly address this with supplying any materials and information that would be needed to our LEP customers.

Description of how we would provide translation of vital documents consistent with the Safe Harbor Provision.

Based upon the Four-Factor analysis, findings show that the City of Hartford is below the Safe Harbor threshold. If at any point during our review of the Language Assistance Plan we will address this issue through outreach to the community and any other resources for assistance.

Description of how we will monitor, evaluate and update Language Assistance Plan.

We will review our LAP every three years and provide an updated plan at that time. We will continue to monitor the U.S. Census Bureau American Fact Finder for any changes that would place us above the Safe Harbor threshold.

Description of how we would train employees.

If our LAP would change to where we would need to provide training for the employees, we would do so in a timely matter. We would research for any materials via the internet or other agencies to help provide this type of training that would be needed.

Minority Representation on Planning and Advisory Boards

The City of Hartford does not have a transit-related planning commission or advisory board.

Equity Analysis for Land Acquisition

The City of Hartford has no projects that require land acquisition.

Attachment A-1
Employee Education Form - Title VI Policy

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

All employees of the City of Hartford are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to Julie Hanrahan.

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

Attachment A-2
Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the City of Hartford 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.B.

Signature

Print your name

Date

Attachment B
Sample Title VI Notification Forms

Title VI Public Notification

Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

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).

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

If you feel you are being denied participation in or being denied benefits of the transit services provided by City of Hartford, or otherwise being discriminated against because of your race, color, or national origin, you may contact our office at:

**Julie Hanrahan
109 N. Main Street
Hartford, WI 53027
jhanrahan@ci.hartford.wi.us
262-673-8204**

For more information, visit our website at www.ci.hartford.wi.us

Attachment C

- **Title VI Complaint form**
- **Sample Title VI Complaint Procedure letters**

Title VI Complaint Form

Name:

Address:

City, State, Zip Code:

Telephone Number: _____ (home) _____ (cell) _____

Person discriminated against: _____

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

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

Race Color National Origin

What was the date of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

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

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

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

What type of corrective action took place?

What remedy are you seeking?

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

Complainant Signature

Date

Print your name

Sample

Letter Acknowledging Receipt of Complaint

Date

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

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against City of Hartford alleging_____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 262-673-8204, or write to me at this address.

City of Hartford
Title VI Coordinator
109 N. Main Street
Hartford, WI 53027

Sincerely,

Title VI Coordinator

Letter Notifying Complainant that the Complaint Is Substantiated

Date

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

Dear Ms. Doe:

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

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

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

Sincerely,

Title VI Coordinator

Letter Notifying Complainant that the Complaint Is Not Substantiated

Date

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

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the City of Hartford alleging _____ has been investigated.

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

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

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

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

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

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

Sincerely,

Title VI Coordinator