



TITLE VI
NON-DISCRIMINATION
PROGRAM AND LIMITED-
ENGLISH PROFICIENCY PLAN

Chippewa-Eau Claire MPO
October 4, 2023

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

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This Chippewa-Eau Claire MPO *Title VI Non-Discrimination Program and Limited-English Proficiency (LEP) Plan* and other MPO documents, meeting minutes and agendas, and other information may also be obtained on our website at www.wcvrpc.org/chippewa-eau-claire-mpo

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This *Title VI Non-Discrimination Program and Limited-English Proficiency (LEP) Plan* is funded in part through grants from the Federal Highway Administration and Federal Transit Administration, and Wisconsin Department of Transportation. The views and opinions of the authors expressed herein do not necessarily state or reflect those of the U. S. Department of Transportation or other funding agencies.

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Title VI Non-Discrimination Program

Introduction

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

The Chippewa-Eau Claire MPO, as a recipient of federal financial assistance, will ensure compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); 49 CFR Part 21; and related statutes and regulations. The Chippewa-Eau Claire MPO acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

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

Organizational Responsibilities

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

The Chippewa-Eau Claire MPO's Director is responsible for ensuring the implementation of the Chippewa-Eau Claire MPO's overall Title VI Non-Discrimination Program.

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Title VI Non-Discrimination Responsibilities

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the Chippewa-Eau Claire MPO's nondiscrimination requirements, including the following activities:

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

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

Content of Title VI Program

The Chippewa-Eau Claire MPO, as a subrecipient of FTA funds, must submit to the Wisconsin and Minnesota Departments of Transportation, which are the primary recipients of transit funds:

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

General Requirements

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

- A. Providing Title VI assurances and Implementation Plan Agreement
- B. Preparing and submitting a Title VI Program
- C. Notifying beneficiaries of protection under Title VI
- D. Developing Title VI/Non-Discrimination complaint procedures and complaint form
- E. Recording and reporting Title VI/Non-Discrimination investigations, complaints, and lawsuits
- F. Promoting inclusive public participation

- G. Minority representation on planning and advisory bodies
- H. Providing meaningful access to Limited-English Proficient (LEP) persons

A. PROVIDING TITLE VI ASSURANCES

The Chippewa-Eau Claire MPO Title VI Assurances are included with this program in [Appendix B](#).

B. PREPARING AND SUBMITTING A TITLE VI PROGRAM

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

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

C. NOTIFYING BENEFICIARIES OF PROTECTION UNDER TITLE VI

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

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

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

Chippewa-Eau Claire MPO's *Notice of Nondiscrimination* is provided in the following locations:

- Agency website (www.wcwrpc.org/chippewa-eau-claire-mpo)
- Agency office (800 Wisconsin St., Eau Claire, WI 54703)

In English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the Chippewa-Eau Claire MPO at 715.836.2918 if additional information is needed in another language.

To view a copy of Chippewa-Eau Claire MPO's *Notice of Nondiscrimination*, please see [Appendix C](#).

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

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

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

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

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

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

The Chippewa-Eau Claire MPO's *Complaint Procedure* and *Complaint Form* are shown in [Appendix C](#) and are made available in the following locations:

- Agency website at (www.wcwrpc.org/chippewa-eau-claire-mpo)
- Agency office (800 Wisconsin St., Mail Box 9, Eau Claire, WI 54703)

E. COMPLAINT LOG

CIVIL RIGHTS INVESTIGATIONS

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

[Appendix C](#) includes the Chippewa-Eau Claire MPO's procedure and tracking mechanism to investigate, track, and resolve civil rights complaints.

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

F. PROMOTING INCLUSIVE PUBLIC INVOLVEMENT

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

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

The Chippewa-Eau Claire MPO pursues meaningful and continued public participation in the three categories of transportation planning listed below in order to determine the region's transportation vision and future goals.

- Implementing policy (e.g., Chippewa-Eau Claire MPO Public Participation Plan)
- Developing and amending plans and programs (e.g., Chippewa-Eau Claire MPO Long Range Transportation Plan and Chippewa-Eau Claire MPO Transportation Improvement Program)
- Conducting general transportation plans and studies (e.g., local community bicycle and pedestrian plans, corridor studies)

The Chippewa-Eau Claire MPO maintains and conducts its planning activities in accordance with a Public Participation Plan (PPP), available on the Chippewa-Eau Claire MPO website. The Chippewa-Eau Claire MPO's Title VI Program is integrated into the PPP by reference.

G. DEMOGRAPHIC REPRESENTATION ON PLANNING AND ADVISORY BODIES

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

Information on the Chippewa-Eau Claire MPO Policy Council and Technical Advisory Committee is available on the MPO website. The Chippewa-Eau Claire MPO is comprised of the Chippewa-Eau Claire MPO Policy Council and the Technical Advisory Committee (TAC). The Chippewa-Eau Claire MPO Policy Council is made up of the highest elected officials from member communities making the demographic representation under the control of the electorate. As the highest authority, the Policy Board makes the final approvals. The TAC serves in an advisor role by reviewing, prioritizing,

and recommending policies, projects, plans, and programs to the Chippewa-Eau Claire MPO Policy Board.

The public is invited to attend any of the meetings. The Chippewa-Eau Claire MPO staff encourages participation by all groups. Meeting agendas are sent to local media and libraries for posting. Demographic representation on Chippewa-Eau Claire MPO committees is illustrated in Table 1. The Chippewa-Eau Claire MPO recognizes that the minority representation on its boards is not reflective of the minority representation of its planning area, but members of minority groups have been invited to participate by email. Although we continue to conduct outreach through email, the Chippewa-Eau Claire MPO strives to expand its efforts with more direct and better targeting.

Table 1: Ethnic and Racial Composition of MPO Committees and Planning Area

Committee	Race/Ethnicity							
	Hispanic or Latino	White Alone	Black or African American Alone	Asian Alone	American Indian or Alaska Native Alone	Native Hawaiian and Other Pacific Islander Alone	Some Other Race Alone	Two or More Races
Planning Area	2.5%	88.8%	1.3%	3.1%	.4%	.1%	.2%	3.5%
Policy Council	0%	100%	0%	0%	0%	0%	0%	0%
TAC	0%	100%	0%	0%	0%	0%	0%	0%

Source: 2020 Decennial Census, [U.S. Census Bureau](https://www.census.gov). Table Pg: HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO BY RACE

H. PROVIDING MEANINGFUL ACCESS TO LIMITED-ENGLISH PROFICIENT PERSONS

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

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

Demographic Profile, Procedures, and Impacts

As part of the Title VI Program, the Chippewa-Eau Claire MPO monitors and tracks statistical demographic data as it becomes available on race, age, language spoken, income level, persons with disabilities, and sex of the population of the Chippewa-Eau Claire MPO area.

DEMOGRAPHIC PROFILE

A minority person in the Chippewa-Eau Claire MPO planning area is defined as a person who identifies as Hispanic and/or a racial group other than White Alone. The minority percentages by planning area community are provided in Table 2.

Minorities make up 11.2% of the planning area population. The Chippewa-Eau Claire MPO continues to experience a slow change in diversity. The Chippewa-Eau Claire MPO area is gradually diversifying, with a drop in White-only population from 91.9% in 2017 to 88.8% in 2020. However, the

new census-defined category of Two or More Races complicates this analysis. The 2020 Census was the first decennial census that allowed individuals to self-identify with more than one race. 3.5% of the population in the Chippewa-Eau Claire MPO area identified as Two or More Races, which likely led to a larger than average reduction in the White-only population. In addition, other minority racial groups experienced small increases in percent of population.

Table 2: Minority Population for Planning Area Communities

Community	Total Population Estimate	White Alone Estimate	Minority Estimate	Percent Minority Estimate
<i>Cities</i>				
Altoona	8,293	7,332	961	11.6
Chippewa Falls	14,731	13,140	1,591	10.8
Eau Claire	69,421	58,879	10,542	15.2
<i>Villages</i>				
Lake Hallie	7,170	6,457	713	9.9
<i>Towns</i>				
N/A				
Planning Area	172,007	152,745	19,262	11.2
Source: 2020 Decennial Census, U.S. Census Bureau . Table P9: HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO BY RACE				

PROCEDURES FOR THE PLANNING PROCESS

The procedures by which the mobility needs of minority and all populations are identified and considered in the Chippewa-Eau Claire MPO planning process include public outreach:

- Notifying local media of meeting time and locations, including postings at community libraries in the planning area.
- An environmental justice analysis using GIS is completed every two years for the Transportation Improvement Program (TIP), which includes maps showing the proximity of transportation projects to tracts identified as having a high percentage of minority, LEP, and low-income persons. This analysis is also done every five years for the update of the Long Range Transportation Plan (LRTP). All plans and programs are available on the Chippewa-Eau Claire MPO website at www.wcwrpc.org/chippewa-eau-claire-mpo.

The goals and objectives for the Public Participation Plan include:

Goal: The goal of the PPP is to offer real opportunities for the engagement of all citizens of the Chippewa-Eau Claire area in the development of transportation plans and programs.

Objectives:

- Continue public involvement practices that have been found successful in providing opportunities for engagement for the majority of citizens in the Chippewa-Eau Claire area.

- Determine what non-English language and other cultural barriers to public participation exist within the Chippewa-Eau Claire area.
- Provide general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- Hold meetings in locations which are accessible and reasonably welcoming to all area residents, including but not limited to, low-income and minority members of the public.
- Provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.
- Use various illustrative visualization techniques to convey the information, as appropriate, including but not limited to charts, graphs, video, maps, photos, computer simulation, and the internet.

The Public Participation Plan can be found at www.wcwrpc.org/chippewa-eau-claire-mpo

ANALYSIS OF IMPACTS OF THE DISTRIBUTION OF STATE AND FEDERAL TRANSIT FUNDS
[FTA Circular 4702.1B](#), Title VI Requirements and Guidelines for Federal Transit Administration Recipients, discusses the need for Chippewa-Eau Claire MPO Title VI Plans to analyze the distribution of state and federal funds in aggregate for transportation purposes and to identify any disparate impact on the basis of race, color or natural origin.

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

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

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

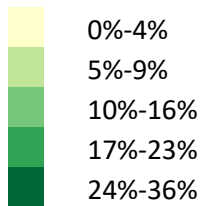
Table 3: Obligated and Projected Federal and State Transit Investment, 2023-2026

Transit Revenues	2024	2025	2026
FTA 5307	1,088	\$0	\$0
FTA 5311	\$0	\$0	\$0
State Operating Assistance	\$0	\$0	\$0
Source: 2023-2026 Transportation Improvement Program approved 2021			

Figure 1 shows 2024-2028 Transportation Improvement Program (TIP) projects as of August 2023. The figure shows location of projects and the percent minority and percent of persons in poverty for each area where a project is located. Reconstruction projects have the greatest impact on communities because they often involve work beyond the roadway itself and may include some expansion, encroaching on adjacent properties. There are 25 of the 34 TIP projects in the planning area that impact low-income (7 percent or more) and minority (5 percent or more) populations.

These projects will be undergoing preliminary engineering over the coming years of the 2024-2028 TIP (and probably beyond) and so not much detail is known. The entire TIP can be found on the website www.wcwrpc.org/chippewa-eau-claire-mpo. The TIP has maps that show specific locations and poverty and minority information per census tract. The data ranges are immediately below:

**Percent Minority
Population**



**Percent Poverty
Population**

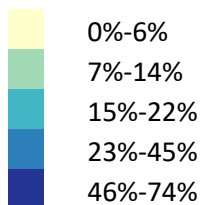


Figure 1: 2024-2028 Transportation Improvement Program projects.

Project #	Project Name	Location	Year	Adjacent Minority Pop. Range	Adjacent Poverty Pop. Range
1	50th Ave Trail	Stillson School to CTH J	2025		
2	CTH CC	CTH TT to 33rd St.	2024		
3	State St./CTH F	Hamilton to Golf	2024		
4	CTH F	B-18-008 over Lowes Creek	2024		
5	Central Street Bridge	Duncan Creek	2026		
6	CTH J and 50th Ave	Intersection	2026		
7	CTH X	197th St. - CTH XX	2024		
8	CTH T	STH 312 to STH 29	2025		
9	CTH OO	US Business 53 to STH 124	2025		
10	IH 94	USH12 to STH312	2028		
11	STH 124	High St. to Bridge St.	2025		
12	STH 124	Elm St. to CTH S	2025		
13	STH 124	CTH S to STH 64	NA		
14	STH 93	S. County Line to Cedar Rd.	2025		
15	STH 124	CTH OO to STH 29	NA		
16	CTH X	197th St. - CTH XX	2024		
17	State St./CTH F	Heather Rd. to Hamilton Ave	2024		
18	CTH J	CTH J and 50th Intersection	2024		
19	USH 12	Industrial Dr. to Fall Creek	2024		
20	USH 53	USH 10 to Old Town Hall Rd.	2024		
21	CTH F	Lowes Creek Bridge	2026		
22	STH 29	160th St. Bridge	2026		
23	STH 29	Chippewa River Bridge	2026		
24	CTH OO	US Business 53 to STH 124	2025		
25	County Line Road	.5 mile west of Jeffers Rd. to Jeffers Rd.	2026		
26	E. Hamilton Ave	Horlacher Ln. to Gateway Dr.	2025		
27	STH 178	Olson Dr. to Cashman Dr.	2025		
28	STH 178	O'Neil Creek Bridge	2024		
29	50th Ave Trail	Stillson School to CTH J	2024		
30	STH 29	40th Ave to .5 mile W of CTH K	2024		
31	USH 53	CTH QQ to La Salle St.	2024		
32	IH 94	STH 93 Bridges	2024		
33	USH 53	Golf Rd to 40th Ave	2024		
34	STH 29	50th Ave. Bridge	2025		
35	CTH K	Yellow River Bridge	2026		
36	Dewey St.	Eau Claire River Bridge	2024		

Limited-English Proficiency (LEP) Plan

Overview

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

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

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

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

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

Plan Summary

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

Plan Components

As a recipient of federal US DOT funding, the Chippewa-Eau Claire MPO is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

This plan includes the following elements:

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

FOUR-FACTOR ANALYSIS

To prepare this plan, the Chippewa-Eau Claire MPO conducted a four-factor analysis which considers:

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

FACTOR 1 – DEMOGRAPHY: NUMBER AND PROPORTION OF LEP PERSONS WHO MAY BE SERVED OR ARE LIKELY TO ENCOUNTER AN CHIPPEWA-EAU CLAIRE MPO PROGRAM OR SERVICE.

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

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

The Safe Harbor Threshold is calculated by dividing the population estimate for the planning area for a language group that “speaks English less than very well” by the total population of persons five years and older (universe for S1601) for the planning area. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the Chippewa-Eau Claire MPO must provide translation of vital documents in written format for non-English speaking persons.

Table 4 shows that the Chippewa-Eau Claire MPO planning area has a population estimate of 158,911¹ and a limited-English proficient (LEP)² population of 2,967 (1.8%). Only Asian language speakers who speak English less than very well (LEP) has an estimate (1,676) that exceeds the minimum threshold of 1,000 persons. The Hmong population is the largest language population in the Asian and Pacific category for the Chippewa-Eau Claire MPO. At this time, the U.S. Census only provides race data for Hmong population at the National and State levels. For the purpose of this plan, the Chippewa-Eau Claire MPO took the State percentage of Hmong and divided that by total Asian, which resulted in 33.6 percent. The Chippewa-Eau Claire MPO then took that number and multiplied it by its Asian and Pacific population. The totals are well below the 5% thresholds. This means the Chippewa-Eau Claire MPO is not required to provide written translation of vital documents, at this time.

The LEP estimate of all other other-than-English-language speakers in the planning area is less than both Safe Harbor thresholds (1,000 persons or 5%). This means the Chippewa-Eau Claire MPO is not required at this time to provide written translation of vital documents in any other language.

In the future, if Chippewa-Eau Claire MPO meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures for oral interpretation.

Table 4: Estimate of Limited-English Proficient Persons in the MPO Planning Area

Attribute	Estimate	Margin of Error	% Estimate	% Margin of Error
Planning Area Population ¹	158,911	586	-----	-----
Limited-English Proficient (LEP) ²	2,967	584	1.8	0.4
Asian and Pacific Island language speakers (includes Hmong)	1,676	512	49.5	11.7
Spanish language speakers	741	221	26.0	5.9
Other Indo-European languages	492	142	22.6	6.8
All other other-than-English speakers	58	71	19.5	17.1

¹ Population 5 years and over.
² Speaks English less than very well.
 Source: S1601 Language Spoken at Home, 2017-2021 ACS 5-year estimates, [U.S. Census Bureau](https://www.census.gov).

FACTOR 2 – FREQUENCY OF CONTACT WITH LEP PERSONS.

The Chippewa-Eau Claire MPO staff reviewed the frequency with which its Policy Council, TAC, and staff have or could have contact with LEP persons. This includes documenting phone inquiries or office visits. Since approval of the 2020 LEP Plan, the Chippewa-Eau Claire MPO has had no requests for interpreters and no requests for translated program documents. The Chippewa-Eau Claire MPO Policy Council, TAC and staff have had no known contact with LEP persons.

Chippewa-Eau Claire MPO staff have been trained to track the number of LEP encounters using the LEP Tools in Tables 5 and 6 and shown in Appendix F and considers adjustments as needed to its

¹ Population 5 years and over; universe for S1601.

² Speaks English “less than very well.”

outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the Chippewa-Eau Claire MPO’s programs and services.

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

Table 5: Log of LEP Encounters and Language Translation Requests

Date	Time	Language Spoken by Individual	Name/Phone Number of Individual	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
None							

If ever a language barrier were to exist, Chippewa-Eau Claire MPO would work to provide a reasonable accommodation. The “*I Speak*” *Language Identification Card* is a document is a tool that can be used by Chippewa-Eau Claire MPO staff to assist LEP individuals. The “*I Speak*” *Language Identification Card*³ illustrated in Table 6 includes languages spoken in the Chippewa-Eau Claire MPO planning area as identified by U.S. Census data.

Table 6: "I Speak" Language Identification Card

Mark this box if you speak....	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Mandarin
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	मैं हिंदी बोलते हूँ	Hindi
	Jag pratar svenska	Swedish

³ For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>.

FACTOR 3 – IMPORTANCE OF PROGRAM TO LEP PERSONS.

Understanding that an LEP person with a language barrier can face difficulties accessing essential services, the Chippewa-Eau Claire MPO has committed to ensuring that all segments of the population, including LEP persons, can participate in the transportation planning process. With improving outreach activities, the Policy Council, TAC, and Chippewa-Eau Claire MPO staff are working to increase contact with LEP individuals at public meetings and other general public involvement activities.

The potential impact of transportation projects on LEP persons and other disadvantaged populations is assessed annually with the update of the Transportation Improvement Program (TIP).

FACTOR 4 – RESOURCES AND COSTS TO PROVIDE LEP ASSISTANCE

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

The Chippewa-Eau Claire MPO can and will contract with language interpreter services. Anyone in need of language interpretation may call the Chippewa-Eau Claire MPO staff office at 715.836.2918 for assistance.

DESCRIPTION OF SERVICES, MONITORING, AND TRAINING

LANGUAGE ASSISTANCE SERVICES

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

The Chippewa-Eau Claire MPO will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

The CHIPPEWA-EAU CLAIRE MPO strives to offer the following measures:

- ✓ Post Title VI, LEP, and ADA information on the [MPO website](#).
- ✓ Post a statement on the [MPO website](#) stating, "If you need special accommodation or translation into another language to view Chippewa-Eau Claire MPO plans or programs, please contact Eric Anderson at 715.836.2918." This sentence is also translated in Spanish and Hmong.
- ✓ At public meetings or other community input events:
 - Greet participants as they arrive at Chippewa-Eau Claire MPO sponsored events.
 - Maintain a Log of LEP Encounters at public meetings or other community events.
- ✓ Maintain a *Log of LEP Encounters* to capture information on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
 - Survey Chippewa-Eau Claire MPO staff periodically on their experience concerning contacts with LEP persons during the previous year.

- ✓ Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Provide assistance with language interpretation by calling Chippewa-Eau Claire MPO staff at 715.836.2918. The Chippewa-Eau Claire MPO will contact resources for language interpreter services.
- ✓ Seek translation assistance from community organizations such as:
 - El Centro de Conexión de Chippewa Valley
 - Eau Claire Area Hmong Mutual Assistance Association
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <https://wisconsinrelay.com>.
- ✓ Utilize online resources such as Google Translate to assist with translation requests. The main downside of this approach is accuracy. As such, this option will be used by the Chippewa-Eau Claire MPO on limited basis. Instead, the Chippewa-Eau Claire MPO will seek assistance from fluent speakers.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Informing LEP Persons of Language Assistance Services

The Chippewa-Eau Claire MPO uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts a statement on the [MPO website](#) stating, “If you need special accommodation or translation into another language to view Chippewa-Eau Claire MPO plans or programs, please contact Eric Anderson at 715.836.2918. This sentence is also translated in Spanish and Hmong.
- ✓ Posts the Title VI/LEP *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact the Chippewa-Eau Claire MPO to request information in another language.
- ✓ Includes a Translate feature on the Chippewa-Eau Claire MPO website to assist LEP individuals with access to the Chippewa-Eau Claire MPO website information.
- ✓ When encountering LEP persons directly, as needed Chippewa-Eau Claire MPO staff will use the “*I Speak*” *Language Identification Card* to identify the language and communication need of LEP persons. The Chippewa-Eau Claire MPO may not be able to immediately accommodate or assist individuals self-identifying as a person not proficient in English but will seek means to follow up with the individual to address their needs in the language requested as soon as possible.
- ✓ Reviews outreach activities and information gathered from the *Log of LEP Encounters* on the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Develops and maintains cooperative relationships with key agencies/community organizations that serve LEP populations in the area or region. These entities can assist in providing or verifying translations and/or identifying gaps in assistance to persons with LEP needs.
- ✓ Provides assistance with language interpretation by calling Chippewa-Eau Claire MPO staff at 715.836.2918. The Chippewa-Eau Claire MPO will contact needed language interpreter services.
- ✓ Utilizes translation services such a fluent speaker on staff, seeking out language assistance from community organizations, Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <https://wisconsinrelay.com>.

- Additional community organizations include
 - El Centro de Conexión de Chippewa Valley
 - Eau Claire Area Hmong Mutual Assistance Association

MONITORING, EVALUATING AND UPDATING THE LEP PLAN

The Chippewa-Eau Claire MPO will review the LEP Plan on an annual basis. Review and updates will include the following:

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

TRAINING STAFF

The following training will be provided to Chippewa-Eau Claire MPO staff:

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

DISSEMINATION OF LEP PLAN

Chippewa-Eau Claire MPO staff will make good faith efforts to notify the public that a LEP Plan and language assistance is available by:

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

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

Appendix A: Title VI Approvals and Administration

Resolution Approving Title VI Plan

Chippewa-Eau Claire MPO Resolution No. 23-08

Approving the Title VI Non-Discrimination Program and Limited-English Proficiency Plan

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

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

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

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

NOW, THEREFORE, BE IT FURTHER RESOLVED: that the Chippewa-Eau Claire MPO approves the *Title VI Non-Discrimination Program and Limited-English Proficiency Plan* as being consistent with metropolitan plans and policies.

Adopted this 4th day of October, 2023

APPROVED:



Gary Spilde, Chairperson
Chippewa-Eau Claire
Metropolitan Planning Organization

ATTEST:



Eric Anderson, Secretary
Chippewa-Eau Claire
Metropolitan Planning Organization

Log of Policy Updates

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

Table 7: Log of Policy Updates

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks/Notes
10/08/2023	Update approved by Policy Board; noticed and posted to website	Eric Anderson	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits, public outreach efforts.
02/05/2020	Update approved by Policy Board; noticed and posted to website	Eric Anderson	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits, public outreach efforts.
10/11/2017	Update approved by Policy Board; noticed and posted to website	Ann Schell	Plan revisions include reviewing and analyzing LEP encounters, US Census data, providing a status update on investigations, and lawsuits, public outreach efforts.
10/08/2014	First Plan approved by Policy Board; noticed and posted to website.	Ann Schell	

Contact Information and Program Administration

Chippewa-Eau Claire MPO Title VI/ADA Coordinator

Eric Anderson, MPO Director

800 Wisconsin St., Mail Box 9

715.836.2918

eanderson@wcrpc.org

Chippewa-Eau Claire MPO Title VI /
ADA Tus Kws Lis Haujlwm

Coordinador de Título VI /
ADA de Chippewa-Eau Claire MPO

Eric Anderson, MPO Director

800 Wisconsin St., Mail Box 9

715.836.2918

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Eric Anderson, MPO Director

800 Wisconsin St., Mail Box 9

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Appendix B: Title VI/Nondiscrimination Assurances

Policy Statement and Authorities

Title VI Policy Statement

The Chippewa-Eau Claire MPO, a WisDOT Subrecipient of FHWA funds, (hereinafter referred to as the “Subrecipient”) assures that no person shall, on the grounds of race, color, national origin, disability, age, limited English proficient, low-income status, or sex as provided by Title VI of the Civil Rights Act of 1964, Section 162 (a) of the Federal Aid Highway Act of 1973 (23 U.S.C. 324), and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The Subrecipient further assures every effort will be made to ensure non-discrimination in whether those programs and activities are federally funded or not.

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

Authorities

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

Nondiscrimination Acts

- **Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) provides:** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
- **Section 162 (a) of the Federal Aid Highway Act of 1973 (23 U.S.C. 324) provides:** No person shall, on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance under this Title or carried on under this Title.
- **The Civil Rights Restoration Act of 1987 (P.L. 100-209), provides:** Clarification of the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. The Act restores the broad, institution-wide scope and coverage of the nondiscrimination statutes to include all programs and activities of Federal-aid recipients,

sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not.

Nondiscrimination Regulations

- 23 CFR 200, Title VI Program and Related Statutes-Implementation and Review Procedures
- 49 CFR 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964
- [USDOT Order 1050.2A](#), *Standard Title VI/Non-Discrimination Assurances*

Title VI Assurances

The United States Department of Transportation (USDOT)

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

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

Statutory/Regulatory Authorities

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

Federal Highway Administration may include additional Statutory/Regulatory Authorities here. The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the (*Federal Highway Administration*).

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

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

Specific Assurances

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

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

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

provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

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

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

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

The Chippewa-Eau Claire MPO gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S.

Department of Transportation under the Long-Range Transportation Planning, Short-Range Multimodal Planning, and Transportation Improvement Program. This ASSURANCE is binding on Wisconsin, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Long-Range Transportation Planning, Short-Range Multimodal Planning, and Transportation Improvement Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Chippewa-Eau Claire MPO

By

Eric Anderson, MPO Director

DATED: October 04, 2023

Appendix C: Protections Under Title VI

Public Notice of Non-Discrimination

Notice of Nondiscrimination

Chippewa-Eau Claire MPO

- ✓ The MPO is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by the MPO in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the MPO.
- ✓ For more information on the MPO's civil rights program, and the procedures to file a complaint, contact 715.836.2918 (for hearing impaired, please use Wisconsin Relay 711 service), email eanderson@wcvrpc.org, or visit our administrative office at 800 Wisconsin St., Eau Claire, WI 54703. For more information, visit www.wcvrpc.org/chippewa-eau-claire-mpo.
- ✓ A complaint may also be filed directly with any of the following:
 - Wisconsin Department of Transportation (WisDOT), Taqwanya Smith, Senior Title VI and ADA Coordinator, Phone: (608) 266-8129, TTY (800) 947-3529, Fax: (608)267-3641, Email: taqwanya.smith@dot.wi.gov, 4822 Madison Yards Way, 5th Floor South, Madison, WI 535705. For more information, visit the [WisDOT Title VI-ADA website](#).
 - U.S. Department of Transportation, Federal Highway Administration (FHWA), Office of Civil Rights. 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590, Phone: (202) 366-0693, email: FHWA.TitleVIcomplaints@dot.gov
 - U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: 1-888-446-4511 or 711(Relay), email: FTACivilRightsCommunications@dot.gov
- ✓ If information is needed in another language, contact 715.836.2918.
Si se necesita informacion en otro idioma de contacto, 715.836.2918.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 715.836.2918.

Complaint Procedure

The Chippewa-Eau Claire MPO's Complaint Procedure is made available in the following locations:

- MPO website in its entirety – www.wcvrpc.org/chippewa-eau-claire-mpo
- MPO office 800 Wisconsin St., Eau Claire, WI 54703

Note: The Complaint Procedure would be translated in Spanish, Hmong, and Chinese as applicable. If information is needed in another language, contact 715.836.2918.

Si se necesita informacion en otro idioma de contacto, 715.836.2918.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 715.836.2918.

Overview

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

Right to File Complaints

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

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

1. Chippewa-Eau Claire MPO, contact Eric Anderson, Title VI Coordinator at 715.836.2918, (for hearing impaired, please use Wisconsin Relay 711 service - <https://wisconsinrelay.com>; email eanderson@wcvrpc.org; or visit our administrative office at 800 Wisconsin St., Eau Claire, WI 54701.
2. Wisconsin Department of Transportation (WisDOT), Taqwanya Smith, Senior Title VI and ADA Coordinator, Phone: (608) 266-8129, TTY (800) 947-3529, Fax: (608)267-3641, Email: taqwanya.smith@dot.wi.gov, 4822 Madison Yards Way, 5th Floor South, Madison, WI 535705. For more information, visit the [WisDOT Title VI-ADA website](#).
3. U.S. Department of Transportation, Federal Highway Administration (FHWA), Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590, Phone: (202) 366-0693, email: FHWA.TitleVIcomplaints@dot.gov
4. U.S. Department of Transportation, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590, Phone: 1-888-446-4511 or 711(Relay), email: FTACivilRightsCommunications@dot.gov

Procedures

Any person who believes they've been discriminated against by the Chippewa-Eau Claire MPO may file a complaint by completing and submitting the Chippewa-Eau Claire MPO's Complaint Form Appendix C.

This civil rights complaint procedure may also be used by the Chippewa-Eau Claire MPO to address, resolve, and close general complaints.

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

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

Complaints should contain the following information:

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

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

Investigation of Complaints

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

The Chippewa-Eau Claire MPO will assume responsibility for investigating complaints against any of its contractors, consultants, lessors, etc.

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

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

The Chippewa-Eau Claire MPO reviews and determines the appropriate action regarding every complaint.

When a complaint is received, the Chippewa-Eau Claire MPO will provide written acknowledgment to the Complainant within 10 business days. The Complainant is notified of the proposed action to be taken to process the allegation(s). The notification letter/email shall contain:

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

The investigation conducted by the Chippewa-Eau Claire MPO consists of a personal interview with the Complainant(s). Information gathered in this interview includes but is not limited to information completed on the [Complaint Form](#) Appendix C.

If more information is needed to address the complaint, the Chippewa-Eau Claire MPO may contact the Complainant.

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

Within 10 business days of the acceptance of the complaint, the Chippewa-Eau Claire MPO will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendation for disposition. Only reasonably qualified and trained investigators should conduct the investigation.

After the Chippewa-Eau Claire MPO reviews the complaint, one of two (2) letters and will be issued to the Complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states there was not a civil rights violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the Complainant wishes to appeal the decision, the Complainant has 10 business days after the date of the letter of finding to do so.

Dismissal

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

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

List of Complaints

The Chippewa-Eau Claire MPO maintains a Complaint Log as shown in Appendix C outlining the list of complaints, investigations and lawsuits alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status

of the complaint, investigation, or lawsuit, actions taken by the Chippewa-Eau Claire MPO in response, and final findings related to the complaint, investigation, or lawsuit.

The Chippewa-Eau Claire MPO will submit a log of all Title VI complaints received, and any additional pertinent records to the WisDOT, Title VI Office, as requested.

For more information, contact:
Chippewa-Eau Claire MPO, Title VI Coordinator
Eric Anderson
eanderson@wcvrpc.org
715.836.2918

Complaint and Comment Form

The Chippewa-Eau Claire MPO is committed to assisting public transportation providers in providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically to eanderson@wcvrpc.org or in person at the address below.
Chippewa-Eau Claire MPO
800 Wisconsin St., Mail Box 9, Eau Claire, WI 54703
You may also call us at 715.836.2918. 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" value="Click or tap here to enter text."/>	Telephone Number (including area code) <input type="text" value="Click or tap here to enter text."/>
Address <input type="text" value="Click or tap here to enter text."/>	City <input type="text" value="Click or tap here to enter text."/>
State <input type="text" value="Click or tap here to enter text."/>	Zip Code <input type="text" value="Click or tap here to enter text."/>
Email Address <input type="text" value="Click or tap here to enter text."/>	
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

[Click or tap here to enter text.](#)

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

Yes

No

Section C: Type of Comment

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

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

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

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? Please check any box that may apply.	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> Bus
What was the date of the occurrence?	Click to add date in the following format: Day, month, year		
What was the time of the occurrence?	Click to add the time		
What is the name or identification of the employee or employees involved?	Click or tap here to enter text.		
What is the name or identification of others involved, if applicable?	Click or tap here to enter text.		
What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.		
What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.		
Where was the location of the occurrence?	Click or tap here to enter text.		

Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Please add any additional descriptive details about the incident.	Click or tap here to enter text.	

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

Click or tap here to enter text.

Section E: Follow-up

May we contact you if we need more details or information?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If yes, how would you best liked to be reached? Please select your preferred form of contact below

<input type="checkbox"/> Phone	<input type="checkbox"/> Email	<input type="checkbox"/> Mail
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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
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Section F: Desired Outcome

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

Click or tap here to enter text.

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

Click or tap here to enter text.

Section G: Signature

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

Name

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

Signature

Complaint Log

The Chippewa-Eau Claire MPO maintains a list or log to track and resolve all complaints, investigations, and lawsuits.

Check One:

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

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

Table 8: Log of Complaints, Investigations, and Lawsuits.

Type Complaint Investigation Lawsuit	Date Complaint Received (Month, Day, Year)	Complainant's Contact Information Name/Phone/ Email/Address	Basis of Complaint ⁴	Summary Complaint Description	Action Taken/ Final Outcome if Resolved List dates of action steps including the dates complaint/ investigation begins and is administratively closed.	Status
None						

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

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

Appendix F: Limited English Proficient (LEP) Tools

“I Speak” Language Identification Card

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Mandarin
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	मैं हिंदी बोलते हूँ	Hindi
	Jag pratar svenska	Swedish

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

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
None							

Language Translation Request Log

Date	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Actions (Was Translation Services Provided?)	Staff Member Providing Assistance	Notes
None						