



Title VI Compliance Program



Approved by Green Bay Transit Commission March 14, 2018

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The Brown County Planning Commission (BCPC), serving as the Metropolitan Planning Organization (MPO) for the Green Bay Urbanized Area, provided data used in the plan.

Green Bay Metro is governed by the Green Bay Transit Commission. The Commission consists of seven individuals. A City of Green Alderman is appointed by the Mayor of Green Bay to serve as a liaison to the City Council and the remaining six positions are also appointed by the Mayor of Green Bay.

Membership of Green Bay Transit Commission and Committees, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Transit Commission	85.7%	0%	14.3%	0%	0%
Disability Appeals Committee	100%	0%	0%	0%	0%

All subrecipients of Green Bay Metro are required to submit a Title VI Program ensuring compliance of the Federal Transit Administration (FTA) Circular 4702.1B.

A. Policy of Nondiscrimination

Green Bay Metro assures that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987, (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by Green Bay Metro.

Title VI compliance is a condition of receipt of federal funds. Patricia Kiewiz, Green Bay Metro Transit Director, serves as the Title VI Coordinator and is authorized to ensure compliance with this policy and the law, including the requirements of the Code of Federal Regulation (CFR).

B. Distribution

Public Dissemination provisions of Title VI information require recipients of Federal financial assistance to publish or broadcast program information in the media. Advertisements must state that the program is an equal opportunity program and/or indicate that federal law prohibits discrimination. Additionally, reasonable steps shall be taken to publish information in languages understood by the population eligible to be served or likely to be directly affected by services.

Title VI public notices are posted on all fixed route buses, paratransit vehicles, public lobbies, and website. To obtain a copy of the Title VI Compliance Program, please contact Green Bay Metro.

C. Complaint Procedure

1. Overview

These procedures cover all complaints filed under Title VI relating to any program or activity administered by Green Bay Metro, its sub-recipients, consultants, and contractors.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel.

Any person who believes they have been mistreated by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Green Bay Metro. Any such complaint must be filed in writing or in person with Green Bay Metro, 901 University Avenue, Green Bay, WI, 54302, within one hundred eighty (180) days following the date of the alleged discrimination occurrence.

Any individual, group, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint. A formal complaint must be filed within 180 days of the alleged occurrence.

Green Bay Metro has had no investigations or lawsuits pertaining to Title VI.

2. Submitting Complaints

Written and verbal complaints will be accepted by Green Bay Metro.

3 Written Complaints

The preferred method is to file your complaint in writing using the Title VI Complaint Form (Appendix B), and sending it to:

Patricia Kiewiz
Title VI Coordinator
Green Bay Metro
901 University Avenue
Green Bay, WI 54302
(920) 448-3450

The complainant is advised to file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Complainant name, mailing address, phone number and information on how to best contact you (i.e., telephone number, e-mail address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names and contact information of any witnesses
- Other information that you deem significant

4. Verbal Complaints

Verbal complaints will be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint, call (920) 448-3450 and ask for the Title VI Coordinator.

5. Procedure

Upon receiving the complaint, Green Bay Metro will determine its jurisdiction, acceptability, need for additional information, and investigative merit of the complaint. In some situations, Green Bay Metro may request that the City of Green Bay Human Resources Department or an independent outside agency conduct the investigation.

Once Green Bay Metro decides its course of action, the complainant will be notified in writing of such determination within five calendar days.

In cases where Green Bay Metro assumes investigation of the complaint, Green Bay Metro will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten days upon receipt, to furnish Green Bay Metro with his/her response to the allegations.

Within 60 days of receipt of the complaint, the Title VI Coordinator will prepare a written investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

The recommendations shall be reviewed by the city of Green Bay attorney. The City Attorney may discuss the report and recommendations with the Title VI Coordinator. The report will be modified as needed and made final for its release to the parties.

Once the investigative report becomes final, briefings will be scheduled within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

6. Appeal

If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s) he or she shall be advised of their rights to appeal Green Bay Metro's decision to the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington DC 20590.

7. Documentation of Complaints

A record of complaints will be maintained by Green Bay Metro and contain the following information for each complaint filed:

- The name and contact information of the person filing the complaint

- The date of the complaint
- The basis of the complaint
- The disposition of the complaint

8. Filing Federal Complaints:

Complaints can be filed externally with the U.S. Department of Transportation and/or the FTA at:

**Federal Transit Administration Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor-TCR
1200 New Jersey Ave. SE
Washington DC 20590**

9. Adoption and Revision History:

Adopted by the Green Bay Transit Commission August 2011
Revised and approved by the Green Bay Transit Commission on July 24, 2013
Revised and approved by the Green Bay Transit Commission on May 20, 2015
Revised and approved by the Green Bay Transit Commission on February 17, 2016
Revised and approved by the Green Bay Transit Commission on March 14, 2018

Appendix A



Title VI Public Notice

Green Bay Metro is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. It is Green Bay Metro's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- Promote the full and fair participation of all affected populations in transportation decision-making.
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

Green Bay Metro is committed to a policy of non-discrimination in the conduct of its business, including adherence to Title VI responsibilities and the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color, or national origin may file a Title VI complaint with Green Bay Metro.

Any such complaint must be in writing and submitted to the Green Bay Metro Title VI Coordinator within 180 days following the date of the alleged discrimination. A Title VI Civil Rights Complaint Form is available by calling 920-448-3450. Complaints should be addressed to:

**Patricia Kiewiz
Title VI Coordinator
Green Bay Metro
901 University Avenue
Green Bay, WI 54302**

A complainant may also file a complaint directly with the Federal Transit Administration by submitting it to the Office of Civil Rights, Attention: Compliant Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE. Washington, DC 20590.

Please visit www.greenbaymetro.org to view Green Bay Metro's Title VI Program.

If information is needed in another language, contact 920-448-3450.

Appendix B



Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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.” Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

Title VI Coordinator
Green Bay Metro
901 University Avenue
Green Bay, WI 54302

1. Complainant's Name _____

2. Address _____

3. City, State and Zip Code _____

4. Telephone Number (home) _____ (business) _____

5. Person discriminated against (if someone other than the complainant)
Name _____
Address _____
City, State and Zip Code _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
a. Race/Color _____
b. National Origin _____
c. Other _____

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? _____ Yes _____ No

If yes, check all that apply:

_____ Federal agency _____ Federal court _____ State agency _____ State court
_____ Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name _____
Address _____
City, State, and Zip Code _____
Telephone Number _____

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date

APPENDIX C

Green Bay Metro Limited English Proficiency (LEP) Plan

POLICY STATEMENT

Green Bay Metro is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census. The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

**2016 American Community Survey (ACS) for Brown County
Summary by Brown County Planning Commission
March 2017**

Language Spoken at Home	Population	Percent	Speak English less than "very well" Number	Speak English less than "very well" Percent
Population 5 years and over	239,418	100.0%	----	----
English only	213,962	89.4%	0	0.0%
Language other than English:	25,456	10.6%	10,314	4.3%
Spanish	15,963	6.7%	7,311	3.1%
Other Indo-European	2,933	1.2%	577	0.2%
Asian and Pacific Islanders	5,613	2.3%	2,222	0.9%
All other languages	947	4.0%	204	0.1%

Those under the age of 5 are not included in language data.

Indo-European includes many, but not all, countries in Europe and the Middle East.

ANALYSIS OF FACTORS

Factor No. 1: The number or proportion of LEP persons in the service area. The vast majority of the population with which we do business (individuals wishing to ride transit) is proficient in English, so that LEP services are not normally required.

1. According to the 2016 American Community Survey, English is spoken by 89.4% of those five and older in Brown County. The majority of those who speak another language also speak English.
2. A total of 7,311 or 3.1 percent of the Spanish speaking population in Brown County indicate they speak English less than "very well".
3. A total of 2,222 persons or 0.9 percent of the Asian and Pacific Islander speaking population in Brown County indicate they speak English less than "very well". The ACS recognizes a total of 280 Asian and Pacific Islander languages. The most common are Chinese, Japanese, Korean, Hmong, Thai, Laotian, and Vietnamese.

Green Bay Metro ensures meaningful access to all programs and activities by persons with Limited English Proficiency. Monitoring of the system is done to ensure all language needs are met. Currently ridership consists of only English and Spanish speaking riders. No other LEP populations meet Safe Harbor thresholds.

Green Bay Metro Title VI and LEP policies and complaint procedures are posted at the Transportation Center and on Metro's website.

Factor No. 2. The frequency with which LEP individuals come into contact with the service. All contacts with Green Bay Metro are made through its Metro Center located in Green Bay, WI. LEP persons are serviced daily via our buses and contracted paratransit demand response service. LEP contacts are relatively minimal.

Factor No. 3: The nature and importance of service provided by Green Bay Metro. Green Bay Metro provides important transit services throughout the urbanized area to the public through its fixed route, limited service and paratransit programs.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. Green Bay Metro has experienced staff that is fluent in Spanish and have agreed to serve as interpreters as needed on those occasions when a person with limited English proficiency contacts the transit system. In an effort to accommodate individuals with language barriers at all times, Green Bay Metro does utilize translation services from a contracted company when necessary. Green Bay Metro provides the following documents in English, Spanish and Somalia:

- Route Guide
- Title VI Notice
- Title VI Complaint Form
- ADA Paratransit Application
- Reduced Fare Application
- Travel Training Brochure

Google Translate is available to assist in the interpretation of Green Bay Metro's website at www.greenbaymetro.org.

IMPLEMENTATION PLAN

Green Bay Metro's plan is currently implemented and it is reviewed annually, including any contacts with LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys and on-board surveys. Green Bay Metro's Title VI Policy and a Complaint Form are available at the Metro Center. All printed maps and schedules have Title VI language. When service changes occur, notices are available in Spanish and English language, other languages upon request. Alerts that provide information on changes are posted on the bus, website and all social media outlets. In order to comply with 49 CFR 21.9(d), Green Bay Metro must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI.

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. 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 Green Bay Metro. Green Bay Metro will engage the public in its planning and decision-making processes, as well as its marketing and outreach activities and includes the Green Bay Chamber of Commerce Diversity Committee, the Green Bay Area Hispanic Community Council, and the Green Bay Area Hmong Community Center for input.

CUSTOMER COMPLAINT PROCESS

Citizens may contact Green Bay Metro to lodge a complaint or comment. All complaints/comments are tracked, followed-up and a response is made to the citizen. This process can be initiated by calling Green Bay Metro at (920) 448-3450, or by visiting the Metro Center located at 901 University Avenue, Green Bay, WI 54302.