

Handishop Industries, Inc.

Title VI/ADA Nondiscrimination Plan

Revised on: September 7, 2023

Adopted by: Patty Clark
Executive Director

Original Plan

Adopted on: July 21, 2014

This plan is hereby adopted and signed by:

Handishop Industries, Inc.

Executive Name/Title: Patty Clark/Executive Director

Executive Signature: *Patty Clark*
Executive Director

As a recipient of USDOT Federal Transit Administration (FTA) funding, per FTA Circular 4702.1B Handishop Industries, Inc. is required to prepare a Title VI/ADA Nondiscrimination Plan including the following elements:

- Evidence of Policy Approval
- Policy Statement, Log of Policy Updates, Contact Information/Program Administration
- Notice of Nondiscrimination (**Appendix 1**)
- Complaint Procedure (**Appendix 2**)
- Complaint Form (**Appendix 3**)
- Recording and Reporting Civil Rights Investigations, Complaints and, and Lawsuits (**Appendix 4**)
- Public Involvement Plan (**Appendix 5**)
- Limited English Proficiency (LEP) Plan (**Appendix 6**)
- Demographic Representation Information (**Appendix 7**)
- Additional information, as required.

Policy Statement

Handishop Industries, Inc. is committed to ensuring that no person is excluded from the 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 Handishop Industries, Inc. in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

Handishop Industries, Inc. receives federal financial assistance to purchase vehicles to provide rides to elderly and disabled individuals for program activities and outings.

Policy Updates – Activity Log

Handishop Industries, Inc. will review its policy on an annual basis to determine if modifications are necessary. The table below outlines the Title VI/ADA Plan reviews/revisions made by Handishop Industries, Inc.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
9/7/2023	Updated Title VI/ADA Plan per WisDOT requirement. Revisions included updated Complaint Form, updated LEP Plan and Minority Representation Information with current US Census data	Patty Clark	Update reflects new WisDot templates
9/9/2020	Update Title VI Plan	Patty Clark	Update reflects new WisDot Templates
9/13/2017	Update Title VI Plan	Patty Clark	Per WisDot requirements
9/12/2014	Develop Title VI Plan	Patty Clark	Per WisDot requirements

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

Contact Information/Program Administration

Executive Director

Handishop Industries, Inc. Executive Director will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name:	Patty Clark
Email:	pclark@handishop.org
Phone:	608-372-3289

Director of Programming

Handishop Industries, Inc.'s Director of Programming will ensure implementation of Handishop Industries, Inc.'s federally funded transportation program. The Director of Programming has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to Handishop Industries, Inc.'s Executive Director.

Name:	Stephanie Squires
Email:	ssquires@handishop.org
Phone:	608-372-3289

Civil Rights Coordinator

Handishop Industries, Inc. Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with Handishop Industries, Inc.'s federally funded transportation activities. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/Nondiscrimination and LEP compliance. This position has a direct reporting relationship and access to Handishop Industries, Inc.'s Executive Director.

Name:	April Knudtson
Email:	aknudtson@handishop.org
Phone:	608-372-3289

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of Handishop Industries, Inc.'s nondiscrimination requirements, including the following activities:

- ✓ Program Administration
 - o Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
 - o Develop and implement Handishop Industries, Inc. Title VI/Nondiscrimination and LEP Plan
 - o Update and maintain Title VI/Nondiscrimination and LEP program policies and procedures
- ✓ Complaints
 - o Review, track, investigate and close Title VI/Nondiscrimination and LEP complaints
- ✓ Employee Training
 - o Educate staff on Title VI/Nondiscrimination and LEP requirements and procedures
- ✓ Reporting
 - o Prepare and submit Title VI/Nondiscrimination reports per state and federal regulations
- ✓ Public Dissemination
 - o Notify the public of Handishop Industries, Inc. Nondiscrimination requirements via Handishop Industries, Inc. public area, on its website, in vehicles, etc.

Oversight

- o Handishop Industries, Inc. does not hire contractors or lessees

Notice of Nondiscrimination

Handishop Industries, Inc.'s *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website <https://www.handishop.org>
- ✓ Public area of the agency office (front reception area)

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact Handishop Industries, Inc. at (608) 372-3289 if additional information is needed in another language.

To view a copy of Handishop Industries, Inc.'s *Notice of Nondiscrimination*, please see **Appendix 1**.

Complaint Procedure and Complaint Form

Handishop Industries, Inc.'s complaint procedure is shown in **Appendix 2** and made available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office (Hard copy in the top drawer of the front reception file cabinet)

A copy of Handishop Industries, Inc.'s *Complaint Form* is shown in **Appendix 3**.

Civil Rights Investigations

Handishop Industries, Inc. maintains a list of any complaints alleging discrimination. The list includes 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 4 is Handishop Industries, Inc.'s procedure and tracking mechanism to investigate, track and resolve complaints.

Since the last update of this Title VI/ADA Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with Handishop Industries, Inc.

Public Involvement Plan

A copy of Handishop Industries, Inc.'s *Public Involvement Plan* is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

A copy of Handishop Industries, Inc.'s *Limited English Proficiency (LEP) Plan* is shown in **Appendix 6**.

The LEP plan outlines the policies and procedures Handishop Industries, Inc. will use to address the needs of persons with limited English proficiency (LEP) that wish to participate in Handishop Industries, Inc. programs and services.

Demographic Representation Information

A copy of Handishop Industries, Inc.'s *Minority Representation Information* is shown in **Appendix 7**.

Handishop Industries, Inc. - Notice of Nondiscrimination to the Public

Handishop Industries, Inc.'s *Notice of Nondiscrimination* is posted in the following areas:

- ✓ Agency website – www.handishop.org
- ✓ Public area of the agency office (front reception area)

Notice of Nondiscrimination

Handishop Industries, Inc.

Handishop Industries, Inc. 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 Handishop Industries, Inc. 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 Handishop Industries, Inc.
- ✓ For more information on Handishop Industries Inc.'s civil rights program, and the procedures to file a complaint, contact Patty Clark at (608) 372-3289; email pclark@handishop.org; or visit our administrative office at 1411 North Superior Ave. Tomah, WI 54660. for more information, visit www.handishop.org.
- ✓ A complaint may also be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590; Phone: 1-888-446-4511; Email: FTACivilRightsCommunications@dot.gov.
- ✓ If information is needed in another language, contact 608-372-3289.
Si se necesita informacion en otro idioma de contacto, 608-372-3289.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-372-3289.

Website Statement:

Handishop Industries, Inc.'s website contains the entire Title VI/ADA Nondiscrimination Plan including above notice in the Business Forms section.

Appendix 2

Handishop Industries, Inc. - Complaint Procedure

Handishop Industries, Inc.'s Complaint Procedure is made available in the following locations: *(list all that apply)*

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
- ✓ Hard copy in the central office (top drawer in file cabinet in reception area)
Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
Other, _____

Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by Handishop Industries, Inc. may file a complaint by completing and submitting agency's Title VI Complaint Form. The Complaint Form may also be used to submit general complaints to Handishop Industries, Inc.

Handishop Industries, Inc. investigates complaints received no more than 180 business days after the alleged incident. Handishop Industries, Inc. will process complaints that are complete.

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

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

Handishop Industries, Inc. has 15 business days to investigate the civil rights complaint. If more information is needed to resolve the case, Handishop Industries, Inc. may contact the complainant.

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

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

After the investigator reviews the complaint, one of two (2) letters will be issued to the complainant: a closure letter or a letter of finding (LOF).

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

If the complainant wishes to appeal the decision, the complainant has 15 business days after the date of the letter or the LOF to do so.

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

If information is needed in another language, then contact 608-372-3289.

Si se necesita información en otro idioma de contacto, 608-372-3289.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 608-372-3289.

Handishop Industries, Inc. - Complaint/Comment Form

Handishop Industries, Inc. is committed to 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 at www.handishop.org or in person at the address below.

Handishop Industries, Inc.
1411 North Superior Ave
Tomah, WI 54660

Section A: Accessible Format Requirements

Please check the preferred format for this document

☐ Large Print	☐ TDD or Relay	☐ Audio Recording	☐ Other (if selected please state what type of format you need in the box below)
--------------------------------------	---------------------------------------	--	---

Click or tap here to enter text.

You may also call us at 608-372-3289. Please make sure to provide your contact information in order to receive a response.

Section B: Contact Information

Name Click or tap here to enter text.	Telephone Number (including area code) Click or tap here to enter text.
Address Click or tap here to enter text.	City Click or tap here to enter text.
State Click or tap here to enter text.	Zip Code Click or tap here to enter text.

Email Address Click or tap here to enter text.

Are you filing this complaint on your own behalf?	☐ Yes	☐ 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.

☐ Complaint	☐ Suggestion	☐ Compliment	☐ Other
------------------------------------	-------------------------------------	-------------------------------------	--------------------------------

Which of the following describes the nature of the comment? Please check one or more of the check boxes.

☐ Race	☐ Color	☐ National Origin	☐ Religion
☐ Age	☐ Sex	☐ Service	☐ Income Status
☐ Limited English Proficient (L.E.P)		☐ 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.	☐ Paratransit	☐ Shared Ride Taxi	☐ 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?	☐ Yes ☐ No		
Please add any additional descriptive details about the incident.	Click or tap here to enter text.		

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

Click or tap here to enter text.

Section E: Follow-up

May we contact you if we need more details or information?

☐ Yes

☐ No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

☐ Phone

☐ Email

☐ Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

Section F: Desired Outcome

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

Click or tap here to enter text.

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

Click or tap here to enter text.

Section G: Signature

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

Name Click or tap here to enter text.

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

Signature Click or tap here to enter text.

Appendix 4

List of Complaints, Investigations and Lawsuits²

Handishop Industries, Inc. maintains a log to track and resolve transportation related civil rights complaints, investigations, and lawsuits.

Check One:

☒ Since the last update of this Title VI/ADA Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with _____ Handishop Industries, Inc.

☐ There has been transportation related civil rights investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint ³	Summary Complaint Description	Status	Action Taken/ Final Outcome if Resolved

² **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

³ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Handishop Industries, Inc. - Public Involvement Plan

The purpose of the **Public Involvement Plan** is to establish procedures that allow for, encourage, and monitor participation of all citizens within Handishop Industries, Inc. service area including but not limited to low income and minority individuals, and those with limited English proficiency (LEP).

While traditional means of soliciting public involvement may not reach such 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.

Goal

The goal of public involvement is to offer real opportunities for the engagement of all citizens within Handishop Industries, Inc. service area to participate in the development of plans, programs and services.

Strategies

In order to promote inclusive public participation, Handishop Industries, Inc. uses the following strategies, as appropriate.

- o Coordination and Consultation
 - o Coordinate and consult with partners, stakeholders, program participants and their caregivers, and the public affected by the distribution of state and federal transit grant programs.
 - o Seek guidance and input from WisDOT on public involvement mechanisms and strategies.
 - o Maintain an electronic distribution list of all potential program participants, partners, stakeholders, etc.
- o Accessibility and Information
 - o Meetings
 - Adhere to state and federal public hearing requirements
 - Provide a 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.
 - Employ different meeting sizes and formats
 - Provide avenues for two-way flow of information and input from populations which are not likely to attend meetings.
 - o Make public information available in electronically accessible formats
 - o Use social media in addition to other resources to gain public involvement

- o Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
 - o Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.
- o Timeliness
 - o Provide timely information about state and federal grant programs to affected program participants, the public, partner agencies, and other interested parties.
 - o Provide adequate notice of public involvement activities and time for public review and comment.
- o Public Comment
 - o Work openly and diligently to incorporate public comments received and to notify respondents of final plans, reports, programs, etc.
 - o Provide for early, frequent and continuous engagement by the public
- o Social/Environmental Justice
 - o Seek and consider the needs of those traditionally underserved by participating in outreach efforts that address the needs of minority persons, the elderly, persons with disabilities, limited English Proficient individuals, and low-income households.
 - o Determine what non-English languages and other cultural barriers exist to public participation within Handishop Industries, Inc. service area.
- o Training
 - o Participate in training to continuously improve the knowledge and understanding of civil rights and environmental justice principles.
- o Evaluation
 - o Document and maintain records of public outreach efforts.
 - o Review the effectiveness of public participation activities.
 - o Seek new ways to providing public input opportunities.

Participation Techniques

Handishop Industries, Inc. will use the following participation techniques as deemed appropriate. Participation techniques will be reviewed and modified each year, as necessary. If new techniques are tried and found to be successful, this list will be updated to include the new techniques.

- o Booth at Community events (craft fair, festival, farmers market, parades, etc.)
- o Advisory meetings and committees
- o Direct mailings (letters, fliers, etc.)
- o Website and social media
- o Project-specific newsletter articles
- o Public information meetings
- o Legal advertisements
- o Presentations to community partners, citizens/residents, etc.
- o Press releases, meetings with local media representatives
- o Surveys (telephone, internet, and public information meetings)
- o Work with partner organizations

Public Outreach Activities

Handishop Industries, Inc. maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, Handishop Industries, Inc. reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by Handishop Industries, Inc. are summarized below. Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (e.g., information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities					
Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Staff Members Responsible	Notes
Ongoing	Website, Facebook	Website and Social Media Materials	Website and Social Media Materials	Staff	www.handishop.org
Annually	Annual Surveys	Email survey directly to Providers/Guardians	Survey	HR Coordinator	Document Responses
Annually	Annual Surveys	Email survey directly to Social Workers	Survey	HR Coordinator	Document Responses
Ongoing	Board Meetings	Special Needs Committee	Meeting	Director of Programming & Program Manager	On the Board for Special Needs Committee for the city of Tomah
Annually	Coalition on Transition at High Schools	Monroe and Juneau County	Event attendance with information booth and brochures	Program Manager	Talk to parents and guardians about services offered
Ongoing	Presentations	E-mail	Presentations to groups or individuals	Director of Programming	Go to parents home and speak to a group about services offered
Ongoing	Sunday Funday	Special Needs Committee	Event	Staff	Staff volunteer for Sunday Funday for the Special Needs Committee

Appendix 6

Handishop Industries, Inc. - Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, Handishop Industries, Inc. 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, for some individuals 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 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) Handishop Industries, Inc. must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

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. FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients provides guidance and instructions for LEP Plan development.

Plan Summary

Handishop Industries, Inc. 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 Handishop Industries, Inc.

This plan outlines how to identify a person who may need language assistance, how to inform 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, Handishop Industries, Inc. is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

This plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of the following:
 - ✓ 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.

Meaningful Access - Four Factor Analysis

To prepare this plan, Handishop Industries, Inc. conducted a four-factor analysis, which considers the following:

Factor 1 - Demography

Number and proportion of LEP persons who may be served or are likely to encounter a City of USA program or service.

This plan uses US Census Bureau – American Fact Finder (2011-2015) language data available by Wisconsin county. More data is available on the US Census Bureau ACS website.

The US Census Bureau – American Fact Finder (2011-2015) data shows there are numerous languages spoken in Monroe County. Some of these languages include Spanish, German, Other West Germanic languages, and Other Native North American languages. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the 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), Handishop Industries, Inc. must provide translation of vital documents in written format for non-English speaking persons.

US Census data shows that in Monroe County, with a population estimate of 42,065, 730 ‘speaking English less than very well’ in a specific language group, persons have identified themselves as Spanish speaking and “speaks English less than very well”. This language group is 1.7% and below the 5%, or 1,000 persons threshold of the population to be served. This means Handishop Industries, Inc. is not required to provide written translation of vital documents. All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, Handishop Industries, Inc. is also not required to provide written translation of vital documents in these languages.

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

Factor 2 – Frequency

Frequency of contact with LEP persons.

Handishop Industries, Inc. provides transportation service for our program participant outings.

Handishop Industries, Inc. reviewed the frequency with which its staff have, or could have, contact with LEP persons in the conduct of Handishop Industries, Inc.'s activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. Within the last year, Handishop Industries, Inc.'s staff have had NO (0) requests for interpreters and NO (0) requests for translated program documents in any setting.

Handishop Industries, Inc.'s staff will be trained on what to do when they encounter a person with limited English proficiency.

Handishop Industries, Inc. tracks the number of encounters and considers adjustments to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of Handishop Industries, Inc. programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters.

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

If a language barrier were to exist, Handishop Industries, Inc. would work to provide a reasonable accommodation. The *"I Speak" Language Identification Card* listed shown below is a document that can be used by Handishop Industries, Inc. staff to assist LEP individuals. Additional languages can be added, as needed, to match the demographic changes of Handishop Industries, Inc. service area. The languages included in the *"I Speak" Language Identification Card* below represent many of the languages spoken within Handishop Industries, Inc. service area.

"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	Chinese
	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 हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

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

Factor 3 – Importance

Nature and importance of program to LEPs.

Handishop Industries, Inc. receives federal financial assistance to purchase vehicles to provide rides to elderly and disabled individuals for program activities and outings.

Handishop Industries, Inc. understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. Transportation services provides a key role in connecting LEP persons to these essential services.

Factor 4 – Resources and Costs

Resources available and overall cost 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. Handishop Industries, Inc. will contact state and local units of government and community resources for assistance in translation services.

Even though Handishop Industries, Inc. does not have a separate budget for LEP outreach, it continuously explores ways to implement low cost methods of notifying LEP persons of program services. Outreach efforts include maintaining a website, utilizing social media, developing and printing brochure/materials and having a visible presence in our community to promote program services.

Language Assistance Services

Overview - 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 Handishop Industries, Inc.'s programs and services. Language assistance can include interpretation and/or translation from one language into another language.

Handishop Industries, Inc. will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

Handishop Industries, Inc. strives to offer the following measures when encountering LEP persons:

- ✓ Utilize the *"I Speak" Language Identification Card* or posters to identify the language and communication need of LEP persons.
- ✓ 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.
- ✓ Utilize translation services by contacting a local university to hire a translator when needed.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>
- ✓ Utilize online resources such as Google Translate to assist with the translation of documents. The main downside of this approach is accuracy. As such, this option will be used by Handishop Industries, Inc. on limited basis. Instead, Handishop Industries, Inc. will seek assistance from fluent speakers.
- ✓ Make translated versions (or provide for the interpretation of relevant sections) of all documents/publications available upon requests, within a reasonable time frame.
- ✓ Prioritize the hiring of bilingual staff, as needed.

Public Outreach – Informing LEP Persons of Language Assistance Services

Handishop Industries, Inc. uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts the Title VI/ADA *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact Handishop Industries, Inc. to request information in another language.
- ✓ When encountering LEP persons directly, Handishop Industries, Inc. will use the *"I Speak" Language Identification Card* to identify the language and communication needs of LEP persons. Handishop Industries, Inc. 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.
- ✓ Review 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.

- ✓ Develop and maintain 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.
- ✓ Utilize translation services from a local university.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs for individuals that are deaf, hard of hearing, deafblind, or those with a speech disability <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>

Monitoring, Evaluating and Updating the Plan

Handishop Industries, Inc. 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 Handishop Industries, Inc.'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 Handishop Industries, Inc. staff:

- ✓ Information on Handishop Industries, Inc. Title VI/ADA Non-Discrimination 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.
- ✓ Documentation of language assistance requests using the *Log of LEP Encounters*.
- ✓ How to handle Title VI/ADA Non-Discrimination and LEP complaints.

Appendix 7

Handishop Industries, Inc. - Demographic Representation Information⁴

A. Demographic Representation Table⁵

The table below depicts US Census county population data by race and Handishop Industries, Inc. non-elected committees/councils related to transit.

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian or Pacific Islander	American Indian or Alaskan Native	Two or More Races	No Response
County Population	91.2%	4.2%	1.5%	.8%	.9%	1.4%	
Handishop Industries, Inc. Governing Board	84.6%	0	0	7.7%	0	0	7.7%

B. Efforts to Encourage Minority Participation

Handishop Industries, Inc. understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, Handishop Industries, Inc. encourages participation of all its citizens.

As vacancies on non-elected boards, committees and councils become available, Handishop Industries, Inc. will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, Handishop Industries, Inc. will continue to reach out to community organizations to connect with all population groups in its service area. In addition, Handishop Industries, Inc. will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

⁴ If Handishop Industries, Inc. has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by Handishop Industries, Inc., Title VI regulations require Handishop Industries, Inc. to provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

⁵ County data by race is available at the WisDOT website <https://wisconsindot.gov/Documents/doing-bus/local-gov/astnce-pgms/transit/compliance/title6-race.pdf> or the US Census Bureau website <http://data.census.gov>

Demographic Representation Data Collection Form⁶

Handishop Industries, Inc. Board of Directors

Date:

Dear Member,

Handishop Industries, Inc., as a recipient of federal funds is required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

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

Anti-Discrimination Notice

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

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

Race/Ethnicity

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

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

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

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

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

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

⁶ This form is an optional tool Handishop Industries, Inc. may use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI/ADA plan requirements.

