



CITY OF HUDSON
RESOLUTION NO. 15-24

RESOLUTION APPROVING THE CITY OF HUDSON TITLE IV/ADA
NONDISCRIMINATION PLAN

WHEREAS, the Common Council of the City of Hudson implemented a Shared Ride Transit System to provide transportation services to all interested users in the City of Hudson and in those areas inside Wisconsin within five miles of the City limits starting January 1, 2024; and

WHEREAS, the Common Council of the City of Hudson 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 the City of Hudson in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities; and

WHEREAS, as a recipient of USDOT Federal Transit Administration (FTA) funding, per FTA Circular 4702.1B the City of Hudson is required to prepare a Title VI/ADA Nondiscrimination Plan; and

WHEREAS, the City of Hudson has prepared a Title VI/ADA Nondiscrimination Plan including the following elements; and

- Evidence of Policy Approval
- Policy Statement, Log of Policy Updates, Contact Information/Program Administration
- Notice of Nondiscrimination (Appendix 1)
- Complaint Procedure (Appendix 2)
- Complaint Log (Appendix 3)
- Complaint Form (Appendix 4)
- Public Involvement Plan (Appendix 5)
- Limited English Proficiency (LEP) Plan (Appendix 6)
- Limited English Proficiency LEP Tools (Appendix 7)
- Demographic Representation Information (Appendix 8)

BE IT, THEREFORE, MOVED this 22nd day of April 2024 by the Common Council of the City of Hudson, that the Common Council does hereby approve the City of Hudson Title

IV/ADA Nondiscrimination Plan and does hereby authorize the City Mayor to sign Resolution 15-24 for plan approval.

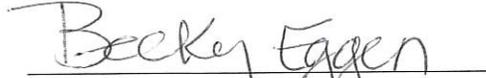
Adopted and dated this 22nd day of April 2024.

APPROVED:



Rich O'Connor, Mayor

ATTEST:



Becky Eggen, City Clerk

Drafted by:
Emily Boles, Community Development
City of Hudson

City of Hudson
Title VI/ADA Nondiscrimination Plan
April 2024

Adopted by: Hudson Common Council

April 22, 2024

This plan is hereby adopted and signed by:

City of Hudson

Executive Name/Title: Mike Johnson, Interim City Administrator

Executive Signature:



As a recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) the **City of Hudson** 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 Log (**Appendix 3**)
- Complaint Form (**Appendix 4**)
- Public Involvement Plan (**Appendix 5**)
- Limited English Proficiency (LEP) Plan (**Appendix 6**)
- Limited English Proficiency LEP Tools (**Appendix 7**)
- Demographic Representation Information (**Appendix 8**)

Policy Statement

The **City of Hudson** 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 the **City of Hudson** in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

The **City of Hudson** receives federal financial assistance to provide transportation service in the City of Hudson and in those areas inside Wisconsin within 5 miles of the City limits to the general population and to purchase vehicles to provide those services.

Policy Updates – Activity Log

The **City of Hudson** 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 the **City of Hudson**.

As applicable, **City of Hudson** will discuss Title VI/ADA Nondiscrimination Plan requirements with its third-party transit providers on an annual basis to ensure compliance with civil rights requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
January 19, 2024	Work with the Wisconsin Department of Transportation (WisDOT) to develop Title VI/ADA Plan for the new shared ride taxi program launched in 2024.	Edwin Rothrock, Mike Johnson	Held 1-hour virtual training/orientation with Becky Soderholm, WisDOT
April 22, 2024	Title VI plan approved by Hudson City Council	Mike Johnson, Emily Boles	Approved by Resolution 15-24 on a vote of 6-0

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

Chief Executive

The **City of Hudson's** Chief Executive 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:	Mike Johnson, Interim City Administrator
Email:	mjohnson@hudsonwi.gov
Phone:	715.716.5744

Civil Rights Coordinator

The **City of Hudson's** Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with the **City of Hudson'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 the **City of Hudson's** Chief Executive.

Name:	Becky Eggen, City Clerk
Email:	cityclerk@hudsonwi.gov
Phone:	715.716.5748

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City of Hudson's** nondiscrimination requirements, including the following activities:

- ✓ Program Administration
 - Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
 - Develop and implement the **City of Hudson'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
 - Educate 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 **City of Hudson's** Nondiscrimination requirements via the **City of Hudson's** public area, on its website, in vehicles, etc.
- ✓ Oversight
 - Ensure contractors and lessees adhere to Title VI/Nondiscrimination and LEP requirements

Notice of Nondiscrimination

[FTA Title VI Circular 4702.1B](#) requires the **City of Hudson** 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 and ADA regulations require **City of Hudson** to inform the public of their rights under Title VI and ADA by posting a *Notice of Nondiscrimination*. The *Notice of Nondiscrimination* should be posted in the following locations: agency website, public areas 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 and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI and ADA information in another language.

The **City of Hudson's** *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website <https://hudsonwi.gov/723/Hudson-Public-TransitPublic> area of the agency office:
Hudson City Hall, 505 3rd Street, Hudson, WI 54016-1694
- ✓ Inside vehicles

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **City of Hudson** at 715.716.5748 if additional information is needed in another language.

To view a copy of the **City of Hudson's** *Notice of Nondiscrimination*, please see **Appendix 1**.

Complaint Procedure, Complaint Log, and Complaint Form

The **City of Hudson**, as a recipient 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 they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) by the **City of Hudson** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **City of Hudson** 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 as a result of project and program impacts on individuals or groups. Examples include social and economic impacts such as access to programs, activities and services, failure to maintain facilities and vehicles, traffic, noise, air quality, and accidents.

Complaints can also originate from individuals or firms alleging inability to bid upon or obtain a contract with **City of Hudson** for the furnishing of goods and services. Examples include advertising for bid proposals; prequalification or qualification requirements; bid awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, etc.

The **City of Hudson'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 Hudson City Hall, 505 3rd Street, Hudson, WI 54016.

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 3 is the **City of Hudson's** *Complaint Log* procedure and tracking mechanism to investigate, track and resolve complaints.

This is the initial Title VI/ADA plan for the recently launched City of Hudson Shared Ride Taxi service. Since the service started on January 1st, 2024, there have been no transportation related civil rights investigations, complaints, or lawsuits filed with the **City of Hudson**.

Complaint Form

City of Hudson's *Complaint Form* is shown in **Appendix 4**.

Public Involvement Plan

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.

City of Hudson's *Public Involvement Plan* is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

As a recipient of federal USDOT funding, the **City of Hudson** 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.

City of Hudson's Limited English Proficiency (LEP) Plan is shown in **Appendix 6**.

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

Demographic Representation Information

The **City of Hudson** 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.

City of Hudson's Minority Representation Information is shown in **Appendix 7**.

Notice of Nondiscrimination to the Public

City of Hudson's *Notice of Nondiscrimination* is posted in the following areas:

- ✓ Public area of the agency office
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules

Notice of Nondiscrimination

City of Hudson

- ✓ The **City of Hudson** 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 the **CITY OF HUDSON** 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 **City of Hudson**.
- ✓ For more information on the **City of Hudson's** civil rights program, and the procedures to file a complaint, contact Mike Johnson, Interim City Administrator, title.vi.complaint@hudsonwi.gov, 715.716.5748 (for hearing impaired, please use [Wisconsin Relay 711 - https://wisconsinrelay.com](https://wisconsinrelay.com) or visit our administrative office at 505 3rd Street, Hudson, WI 54016. For more information, visit <https://hudsonwi.gov/723/Hudson-Public-Transit>
- ✓ A complaint may also be filed directly with 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.
 - 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 1-800-874-9426.
Si se necesita informacion en otro idioma de contacto, 1-800-874-9426.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 1-800-874-9426.

Website Statement:

The **City of Hudson** operates its programs and services without regard to race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in accordance with Title VI of the Civil Rights Act, Americans with Disabilities Act (ADA), and related nondiscrimination authorities. For more information on the **City of Hudson's** civil rights program, ADA obligations, and the procedures to file a complaint, contact Becky Eggen, City Clerk, email Becky Eggen <cityclerk@hudsonwi.gov>, 715.716.5748. For hearing impaired, please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.

Complaint Procedure

The **City of Hudson's** Complaint Procedure is made available in the following locations:

- ✓ Agency website: <https://hudsonwi.gov/723/Hudson-Public-Transit>
 - ✓ Agency office: 505 3rd Street, Hudson, WI 54016-1694
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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 the **City of Hudson** may file a complaint by completing and submitting the **City of Hudson's** Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City of Hudson**.

The **City of Hudson** investigates complaints received no more than 180 calendar days after the alleged incident. The **City of Hudson** will process complaints that are complete.

Once the complaint is received, the **City of Hudson** will review the complaint and work to resolve the complaint informally, if possible.

If the complaint warrants a formal civil rights complaint process, the **City of Hudson** will follow the steps listed in this complaint procedure. The **City of Hudson** may also use this formal procedure to address general complaints. If the **City of Hudson** determines it has jurisdiction the complainant will receive an acknowledgement letter stating the complaint will be investigated by the **City of Hudson** as a civil rights complaint.

The **City of Hudson** has **60** business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **City of Hudson** 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, the **City of Hudson** 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 or 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 closure 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 1-800-874-9426.

Si se necesita informacion en otro idioma de contacto, 1-800-874-9426.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 1-800-874-9426.

Complaint Log
List of Complaints, Investigations and Lawsuits²

The **City of Hudson** 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 the **City of Hudson**.

- Because the **City of Hudson** has recently started service and had no transportation related civil rights complaints, investigations, or lawsuits, the table below has no entries.

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

Note: The performance measure for tracking when an investigation begins and when its administratively closed is documented in the **Complaint Log** table below. **City of Hudson** will strive to complete the investigation within the timeframe specified in its **Complaint Procedure (Appendix 2)**.

Type Complaint Investigation Lawsuit	Date Complaint Received (Month, Day, Year)	Complainant's Contact Information Name/Phone/ Email/Address	Basis of Complaint³	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

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

Complaint/Comment Form

We want your feedback. If you would like to submit a complaint or comment, please complete this form, and submit it via email to Mike Johnson, Interim City Administrator, title.vi.complaint@hudsonwi.gov or in person at the address below.

City of Hudson

505 3rd Street
Hudson, WI 54016

You may also call us at 715-716-5748. 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"/>	Telephone Number (including area code) <input type="text"/>
Address <input type="text"/>	City <input type="text"/>
State <input type="text"/>	Zip Code <input type="text"/>

Email Address

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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"/> Transportation 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?

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

Have you filed a complaint with any other federal, state, or local agencies?

Yes

No

If yes, list agencies and contact information (agency name, address, email, phone).

Click or tap here to enter text.

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.

Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the City of Hudson at the above listed address.

Name

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

Signature

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 the **City of Hudson** 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 the **City of Hudson** service area to participate in the development of plans, programs and services.

Strategies

In order to promote inclusive public participation, the **City of Hudson** uses the following strategies, as appropriate.

- Coordination and Consultation
 - 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.
 - Seek guidance and input from WisDOT on public involvement mechanisms and strategies.
 - Maintain an electronic distribution list of all potential program participants, partners, stakeholders, etc.
- Accessibility and Information
 - 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.
 - Make public information available in electronically accessible formats
 - Use social media in addition to other resources to gain public involvement
 - 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.

- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.
- Timeliness
 - Provide timely information about state and federal grant programs to affected program participants, the public, partner agencies, and other interested parties.
 - Provide adequate notice of public involvement activities and time for public review and comment.
- Public Comment
 - Work openly and diligently to incorporate public comments received and to notify respondents of final plans, reports, programs, etc.
 - Provide for early, frequent and continuous engagement by the public
- Social/Environmental Justice
 - 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.
 - Determine what non-English languages and other cultural barriers exist to public participation within the **City of Hudson** service area.
- Training
 - Participate in training to continuously improve the knowledge and understanding of civil rights and environmental justice principles.
- Evaluation
 - Document and maintain records of public outreach efforts.
 - Review the effectiveness of public participation activities.
 - Seek news ways to providing public input opportunities.

Participation Techniques

The **City of Hudson** 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.

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

Public Outreach Activities

The **City of Hudson** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City of Hudson** 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 the **City of Hudson** 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, Twitter	Website and Social Media Materials	Website and Social Media Materials	Agency Staff	<u>Creation of a web landing page for Hudson Transit:</u> https://hudsonwi.gov/723/Hudson-Public-Transit
Ongoing	Service Pamphlets	Ongoing	Flyers	Mike Johnson	Finalized April 2024 and distribution is ongoing.
12/04/2023	Shared Ride Taxi Program Public Meeting	Advertise Board Meeting on website and newspaper	Public Meeting	Mike Johnson, Edwin Rothrock	Open Public Meeting followed by Common Council Meeting where program launch was approved
11/6/2023	Common Council Meeting	Advertise Board Meeting on website and newspaper	Public Meeting	Mike Johnson, Edwin Rothrock	Council Approves moving forward with SRT launch
10/03/2023	Public Meeting for St. Croix County Coordinated Human Services Transportation Plan	Verbal Communication and Flyers/Handouts, Newspaper Ads, Mailed Invitations to Stakeholders	Public Meeting	Edwin Rothrock, Amy Roemhild - ADRC	Hudson SRT discussed as upcoming transportation resource
04/22/2024	Common Council Meeting	Advertise Board Meeting on website and newspaper	Public Meeting	Mike Johnson, Emily Boles, Edwin Rothrock	Council Approves Title VI Plan.

Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, the **City of Hudson** 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) the **City of Hudson** 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

The **City of Hudson** 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 **City of Hudson**.

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, the **City of Hudson** 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.
 - ✓ **Demography** of LEP persons who may be served or are likely to encounter an LAPC program or service.
 - ✓ **Frequency** of contact with LEP persons
 - ✓ **Importance** of program to LEP persons
 - ✓ **Resources and costs** to provide LEP assistance

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, the **City of Hudson** 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 Hudson program or service.

This plan uses [US Census Bureau – American Fact Finder \(2011-2015\)](#) language data available at the county level in Wisconsin. 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 St. Croix County. Some of these languages include Spanish, Hmong, German, Thai, Arabic, Polish, Persian, and Tagalog. 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), the **City of Hudson** must provide translation of vital documents in written format for non-English speaking persons.

US Census data shows that in St. Croix County, with a population estimate of 80,478, 402 individuals have identified themselves as Spanish speaking and “speaks English less than very well”. This language group is less than 1% and below the 5%, or 1,000 persons threshold of the population to be served. This means the **City of Hudson** 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, the **City of Hudson** is also not required to provide written translation of vital documents in these languages.

In the future, if the **City of Hudson** 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.

The **City of Hudson** and its contractor provides transportation service for the **City of Hudson** and in are within 5 miles of the City within St. Croix County.

The **City of Hudson** reviewed the frequency with which its staff, policy board, and contractors have, or could have, contact with LEP persons in the conduct of **City of Hudson** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. Within the last year, **City of Hudson** staff, policy board members, and contractors have had no requests for interpreters and no requests for translated program documents in any setting.

City of Hudson staff, policy board members, and contractor (Running Inc.) staff are trained on what to do when they encounter a person with limited English proficiency.

The **City of Hudson** with assistance from its contractor, Running 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 the **City of Hudson’s** programs and services. The *Log of LEP Encounters* is a tool to help track LEP encounters (**Appendix 7**).

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
See Appendix 7							

If a language barrier were to exist, **City of Hudson** works to provide a reasonable accommodation. The “*I Speak*” *Language Identification Card* listed shown below is a document that can be used by **City of Hudson** staff to assist LEP individuals. Additional languages can be added, as needed, to match the demographic changes of the **City of Hudson’s** service area. The languages included in the “*I Speak*” *Language Identification Card* below represent many of the languages spoken within the **City of Hudson** 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 Simplified
	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
	میں نے اردو بولتے ہیں	Urdu

Note: For additional languages visit the LEP.gov website
<https://www.lep.gov/sites/lep/files/media/document/2022-06/i-speak-booklet.pdf>

Factor 3 – Importance

Nature and importance of program to LEPs.

It is imperative that language assistance be provided to ensure LEP individuals have access to essential services, and transportation plays a key role in connecting LEP persons to these services. Public transportation fare/service changes and eligibility requirements should be communicated to LEP individuals so they can access the essential programs and services. It is also important that LEP individuals understand their full rights and benefits when accessing transportation program and services to ensure they have been treated fairly and can identify and report discrimination if they are not.

City of Hudson assessment of critical needs includes contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

With improving outreach activities, **City of Hudson** is working to increase contact with LEP individuals at public meetings and other general public involvement activities.

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 available upon request. The **City of Hudson** will contact state and local units of government and community resources for assistance in translation services.

Even though the **City of Hudson** does not have a separate budget for LEP outreach, it continuously explores ways to implement methods of notifying LEP persons of transportation services. Outreach efforts include maintaining a website, utilizing social media, developing, and printing brochure/materials and having a visible presence in our community (e.g., participating in job fairs, parades, community events, etc.) to promote transportation services. Additional outreach methods to reach LEP communities include but are not limited to activities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

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 **City of Hudson's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

City of Hudson will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.

City of Hudson strives to offer the following measures when encountering LEP persons:

- ✓ Post Title VI, LEP, and ADA information on the **City of Hudson** website.
- ✓ Day to day operations:
 - 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.
- ✓ At public meetings or other community events:
 - Greet participants as they arrive at **City of Hudson** public meetings or community events.
 - Make "I Speak" language identification cards available at sponsored events.
 - By informally engaging participants in conversation or by using language identification "I Speak" Language identification Card, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need at future events.
 - Maintain a Log of LEP Encounters at public meetings or other community events.
- ✓ 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>
- ✓ Translation Services
 - Seek translation assistance from community organizations such as:
 - **Hmong Cultural & Community Center** www.hmoobagency.org, 608-781-5744
 - **Centro Latino** - centrolatinolacrosse@gmail.com, 608-515-9134
 - **La Crosse Area Chinese Association** - lacawi.weebly.com

- **Additional resources are shown in the La Crosse Multicultural Resource Guidance** - <https://www.glaxdiversitycouncil.com/multicultural-resource-guide/>
- ✓ 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 **City of Hudson** on limited basis. Instead, **City of Hudson** will seek assistance from fluent speakers.
- ✓ Prioritize the hiring of bilingual staff if possible.

Public Outreach – Informing LEP Persons of Language Assistance Services

The **City of Hudson** 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 the **City of Hudson** to request information in another language.
- ✓ When encountering LEP persons directly, **City of Hudson** will use the “*I Speak*” *Language Identification Card* to identify the language and communication needs of LEP persons. **City of Hudson** 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 such as:
 - **Hmong Cultural & Community Center** www.hmoobagency.org, 608-781-5744
 - **Centro Latino** - centrolatinolacrosse@gmail.com, 608-515-9134
 - **La Crosse Area Chinese Association** - lacawi.weebly.com
 - **Additional resources are shown in the La Crosse Multicultural Resource Guidance** - <https://www.glaxdiversitycouncil.com/multicultural-resource-guide/>
- ✓ 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

The **City of Hudson** will review the LEP Plan on an annual basis and examine 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 which existing language assistance services are effective and sufficient to meet the needs of LEP persons.

- ✓ Determine whether complaints have been received concerning the **City of Hudson'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 **City of Hudson** staff:

- ✓ Information on the **City of Hudson's** 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.

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	Chinese Simplified
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	o magsalita ng Tagalog	Tagalog
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

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

Log of LEP Encounters

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

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

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 to date						

Demographic Representation Information⁴

A. Demographic Representation Table⁵

[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.

The **City of Hudson** Common Council is the body that makes decisions related to transportation services. **Participation on the Common Council is by election.**

Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Some Other Race	No Response
Common Council	N/A - The membership of the City of Hudson Common Council is by election.						

B. Efforts to Encourage Minority Participation

City of Hudson understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population.

To encourage citizen participation in council meetings the **City of Hudson** will reach out to community organizations to connect with all population groups in its service area.

In addition, **City of Hudson** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to encourage community input.

⁴ If **City of Hudson** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by **City of Hudson**, Title VI regulations require **City of Hudson** 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://wisconsin.gov/Documents/doing-bus/local-gov/astnce-pgms/transit/compliance/title6-race.pdf> or the US Census Bureau website <http://data.census.gov>