



TRANSIT COMMISSION MEETING AGENDA

MONDAY, JULY 31, 2023 AT 5:30 PM

WATERTOWN MUNICIPAL BUILDING, 106 JONES STREET, ROOM 0041

In-Person: Watertown Municipal Building 106 Jones Street Room 0041

Virtually: <https://meet.goto.com/827825917> or by calling: +1 (571) 317-3116

Access Code: 827-825-917

1. CALL TO ORDER

2. REVIEW & APPROVE MINUTES

[A.](#) Transit Meeting Minutes from June 5, 2023

3. COMMENTS AND SUGGESTIONS FROM CITIZENS PRESENT

Each individual who would like to address the Committee will be permitted up to three minutes for their comments

4. REVIEW RIDERSHIP / FINANCIAL STATISTICS

[A.](#) Taxi Stats

5. BUSINESS:

[A.](#) Review and potential action: Corner Service - Dr. Jarred Burke with WUSD

[B.](#) Review and take action: Message to be relayed to public/parents in regard to discontinuance of the corner stop service

[C.](#) Information/Q&A session with Passenger Transit Inc.

[D.](#) Review and take action: Title VI Policy Update

[E.](#) Review and take action: Passenger Transit to send monthly logs of complaints and police citations to the City Clerk to report to the Transit Commission

[F.](#) Review and discuss: Compliance Site Review

[G.](#) Update: Vehicle Procurement

6. REVIEW CITIZEN COMMUNICATIONS RECIEVED BY CITY

[A.](#) Complaint Log

7. SET NEXT MEETING DATE

8. ADJOURNMENT

Persons requiring other reasonable accommodations for any of the above meetings, may contact the office of the City Clerk at mdunneisen@watertownwi.gov, phone 920-262-4006

A quorum of any City of Watertown Council, Committee, Board, Commission, or other body, may be present at this meeting for observing and gathering of information only

TRANSIT COMMISSION**June 5, 2023****5:30 pm**

The Transit Commission met on the above date and time in person and virtually with the following members present: Cathy Egan, Michelle Bainbridge, Ald. Schmid, and Tom Hahn. Also in attendance was Megan Dunneisen, City Clerk.

1. **CALL TO ORDER** - Chairperson Egan called the meeting to order at 5:30pm.
2. **REVIEW & APPROVE MINUTES** - Motion was made by Hahn to approve minutes of April 17, 2023, seconded by Egan, and carried by unanimous voice vote.
3. **COMMENTS AND SUGGESTIONS FROM CITIZENS PRESENT** - None
4. **BUSINESS:**
 - A. **Review and Discuss: Compliance Site Review** – Dunneisen gave report on how the Compliance site review went and the items that were flagged. Commission went through all task that need to be corrected and reviewed how they plan to be fixed. Refer to 2023 Correction Action Plan.
 - B. **Review and Approve Title VI Policy** - Ald. Schmid moved to table the Title VI Policy, seconded by Hahn and carried by unanimous voice vote.
 - C. **Review and Discuss: Complaint Process** – Follow up report given on Ellis complaint. Discussion on complaint form and processes. Part of the Title VI Policy.
 - D. **Review and Approve: Vehicle Procurement Options** – no action taken – Dunneisen to get more information from the vendor on the status of the order and to see if this is a vendor or manufacturing delay.
5. **REVIEW CITIZEN COMMUNICATIONS RECEIVED BY CITY** – None
7. **SET NEXT MEETING DATE** - July 31 5:30pm
8. **ADJOURNMENT** - Motion was made by Hahn to adjourn meeting, seconded by Egan and carried by unanimous voice vote at 6:33 pm.

Respectfully submitted,
Megan Dunneisen, City Clerk

DISCLAIMER: These minutes are uncorrected; any corrections will be noted in the proceedings at which these minutes are approved. Complete minutes are open for public inspection in the office the Finance Department.

	2018	2019	2020	2021	2022	Change 18-22	2023	2024	Fare Changes			4/1/2023	
Elderly/Disabled	39,778	35,787	29,795	33,831	34,055	-14.39%			E/H		\$3.00		
Students	17,131	16,295	11,000	17,211	19,506	13.86%			Children		\$3.00		
Agency	0	4,376	3,299	1,716	2,870				Agency Sr and Dis		\$9.00		
Adults	36,690	34,422	28,871	31,191	31,175	-15.03%			Regular		\$4.00		
Children Accompy	959	775	850	1,560	587	-38.79%			Children accompy		\$2.00		
Corner Service	9,408	9,276	2,888	5,698	4,344	-53.83%			Corner Service		\$2.25		
Out of Town	614	228	439	2,581	822	33.94%			Out of Town		\$10.50		
TOTALS	104,580	101,159	77,142	93,788	93,359	-10.73%			Agency		\$9.00		
									Parcel		\$8.25		
2018 monthly	9,436	8,620	9,411	9,050	9,219	7,497	7,066	6,956	8,798	10,064	9,502	8,961	104,580
2019 monthly	9,215	8,992	9,308	9,301	9,138	6,479	6,416	7,020	8,509	9,103	9,056	8,622	101,159
2020 monthly	9,790	9,066	6,442	3,671	4,570	5,397	5,570	5,711	5,971	7,259	6,441	7,337	77,225
2021 monthly	7,393	7,742	9,030	8,975	8,455	7,010	6,780	6,517	7,813	8,255	7,699	8,126	93,795
2022 monthly	8,345	8,408	8,870	8,312	8,136	6,193	6,300	6,340	7,391	7,978	7,987	9,101	93,361
2023 Monthly	8,095	7,789	8,894	8,028	8,054	7,177	0	0	0	0	0	0	48,037

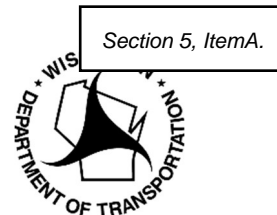
Calls	January	February	March	April	May	June	July	August	September	October	November	December	Total
E/H	3,147	2,929	3,364	2,851	2,917	3,111							18,319
Children	1,824	1,746	1,936	1,796	1,885	1,107							10,294
Agency Sr Dis	250	230	241	318	328	349							1,716
Regular	2,406	2,441	2,868	2,654	2,468	2,329							15,166
Children accompanpy	51	49	78	52	69	63							362
Corner Service	370	339	343	357	387	100							1,896
Out of Town	46	55	64	0	0	118							283
Parcel (temp svc)	1	0	0	0	0	0							1
	8,095	7,789	8,894	8,028	8,054	7,177	0	0	0	0	0	0	48,037
Diff. 2023 over 2022	(250)	(619)	24	(284)	(82)	984	(6,300)	(6,340)	(7,391)	(7,978)	(7,987)	(9,101)	(45,324)
% chg 2022 to 2023	-3.0%	-7.4%	0.3%	-3.4%	-1.0%	15.9%	-100.0%	-100.0%	-100.0%	-100.0%	-100.0%	-100.0%	

Fares													
E/H	\$9,441.00	\$8,787.00	\$10,092.00	\$8,553.00	\$8,751.00	\$9,333.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$54,957.00
Children <12	\$5,472.00	\$5,238.00	\$5,808.00	\$5,388.00	\$5,655.00	\$3,321.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$30,882.00
Agency Sr. Dis.	\$2,250.00	\$2,070.00	\$2,169.00	\$2,862.00	\$2,952.00	\$3,141.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15,444.00
Regular	\$9,622.67	\$9,765.33	\$11,472.67	\$10,616.00	\$9,872.00	\$9,315.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$60,664.22
Children accompanpy	\$102.00	\$98.00	\$156.00	\$104.00	\$138.00	\$126.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$724.00
Corner Service	\$832.50	\$762.75	\$771.75	\$803.25	\$870.75	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,266.00
Out of Town	\$486.50	\$574.00	\$670.25	\$0.00	\$0.00	\$1,240.17	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,970.92
Parcel (temp svc)	8.25 - PTI liste	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Calculated Rev	\$28,206.67	\$27,295.08	\$31,139.67	\$28,326.25	\$28,238.75	\$26,701.73	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$169,908.15
Reported Revenue	\$26,909.50	\$27,634.75	\$30,375.00	\$32,443.50	\$28,787.50	\$24,472.00							\$170,622.25
ACCIDENTS REPORTED	0	0	0	0	0	0							
Difference	-\$1,297.17	\$339.67	-\$764.67	\$4,117.25	\$548.75	-\$2,229.73	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$714.10

2018 Driver Hours	2644.83	2433.85	2715.7	2609.45	2738.53	2497.2	2385.33	2449.49	2491.58	2742.43	2709.6	2641.2	31,059.19
2019 Driver Hours	2767.25	2560.75	2758.40	2677.25	2563.75	2224.25	2277.00	2407.00	2544.75	2767.25	2687.25	1665.10	29,900.00
2020 Driver Hours	2851.25	2566.68	2414.4	1846.3	1968.3	2191.53	2251.95	2215.3	2123.68	2507.55	2302.17	2652.12	27,891.23
2021 Driver Hours	2507.37	2445.5	2714.6	2601.4	2505.77	2212.33	2134.92	2107.17	2310.2	2323.13	2364.8	2500.16	28,727.35
2022 Driver Hours	2434.65	2354.43	2568.02	2396.28	2353.38	2210.45	2091.33	2255.55	2242.78	2374.15	2348.23	2413.4	28,042.65
2023 Driver Hours	2501.42	2222.47	2464.8	2412.93	2428.97	2326.72							14,357.31
times hourly rate	31.27	31.27	31.27	31.27	31.27	31.27	31.27	31.27	31.27	31.27	31.27	31.27	
Calculated Expense	\$78,219.40	\$69,496.64	\$77,074.30	\$75,452.32	\$75,953.89	\$72,756.53	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$448,953.08
Reported Expense	\$78,219.40	\$69,496.64	\$77,074.30	\$75,452.32	\$75,953.89	\$75,756.53							\$451,953.08

WisDOT / DTIM
Division of Transportation Investment Management
PO BOX 7913
4822 Madison Yards Way
Madison, WI 53707-7913

Governor Tony Evers
Secretary Craig Thompson
wisconsindot.gov
Telephone: (608) 266-2665
FAX: enter (608) 267-0294



July 6, 2023

Megan Dunneisen
City Clerk – City of Watertown, WI
PO Box 477
106 Jones St
Watertown, WI 53094

Re: Watertown corner stop transit service

WisDOT's Compliance Site Review meeting with the City of Watertown on March 22, 2023 raised some concerns about the use of the public transit system for school trip purposes via a service referred to by the City as a "corner stop" service. The corner stop service is funded in part by Federal section 5311 funds, Formula Grants for Rural Areas, and State section 85.20 Urban Mass Transit Operating Assistance Program funds. FTA and state regulations do not allow these transit funds to be used to provide transit service exclusively to students (i.e., all trips funded by public transit funds must be clearly open to the general public, even if students are also using it). WisDOT has not received any evidence from the City of the corner stop service being utilized by anyone other than students.

WisDOT requested that the City of Watertown provide additional information about the corner stop service in an email dated May 11, 2023, and this information was provided by the City on June 23, 2023. In its response, the City noted that although the service was available and offered to the general public, the service was ultimately utilized only by students for trips to and from school as non-student members of the general public preferred the standard "curb-to-curb" demand response service. The City also indicated all corner stop trips were subscription trips paid with either cash fares or pre-paid coupons, and that no coupons were purchased by any local schools. The lack of utilization by non-students may or may not have been the result of the transit system's prior language on the public facing website indicating this was a service was "for middle school and high school students to and from school." Although the website language has been revised to specify this service is available to all members of the general public, WisDOT does not expect this language change to result in expanding service beyond student trips to and from school due to the nature of this service as subscription-based; operating in conjunction with the school schedule; and with all pickups and drop-offs occurring at defined corners for which times and locations are not communicated publicly.

WisDOT requires the City to discontinue the use of federal and state public transit operating funds and federally funded public transit vehicles in providing this service utilized exclusively by students. The Corrective Action Plan (CAP) issued to the City on April 27, 2023 has been amended to include the requirement to discontinue the use of public transit funds and vehicles for the student oriented corner stop service within 90 days of receipt of this email: October 4, 2023. Also within the 90 days window, the City will start providing WisDOT with ridership reports and trip denial reports on a quarterly basis in order for WisDOT to monitor compliance. Other items in the CAP are kept at the initial compliance window of August 7, 2023. The amended CAP is attached as well.

Considerations for serving student transit needs:

- ✓ If the City and/or the School District wish(es) to continue providing the corner stop service to students, they may do so with a source of funding other than public transit operating funds and without the use of federally funded public transit vehicles.
- ✓ The City may continue to provide rides to and from school for students using the standard demand response service provided that no preference is given to students versus other members of the general public, and all trips are made available as shared ride trips.
- ✓ The City may opt to establish one or more standard fixed routes using public transit funds to serve both students and the general public. Note the addition of a fixed route to the City's public transit operations would result in needing to meet additional state statutory requirements as shared-ride taxi systems are expressly exempt from some state requirements.

Thank you for your continued attention to this matter and please let us know if you have any follow up questions or comments at public.transit@dot.wi.gov.

Sincerely,



Ian Ritz
Transit Section Chief

<u>TIME</u>	<u>LOCATION</u>	<u>SCHOOL</u>
6:43	Neenah & Williams	HS
6:50	2 nd & Cady	HS & RMS
6:54	Cady & N 6th St	RMS
6:55	Cole & N 4 th St	HS
6:57	Cleveland & Arthur	RMS
6:58	Cleveland & Emerald	RMS
7:00	Dodge & S 10 th St	HS(2) & RMS
7:01	Clyman & S 10 th St	RMS
7:03	Market & S 2 nd St	RMS
7:05	Wisconsin & S 2 nd St	HS(2) & RMS(2)
7:07	Lafayette & Warren	HS
7:08	Church & Elma	HS
7:11	Lisbon & Bonner	RMS(2)
7:12	Wilbur & Bonner	HS
7:15	Timothy & Johnson Park	RMS
7:17	Loisa & Oak	RMS
7:22	Water & Cherry	HS Th & Fri only
7:25	Water & James	RMS
7:30	Riverside Middle School	
7:45	Watertown High School	

From: Emily McFarland
Sent: Friday, July 14, 2023 1:16 PM
To: Jarred Burke
Cc: Carol Quest; Megan Dunneisen; Mark Stevens
Subject: Corner Service through Shared Ride Taxi Program

Good Morning,
I have a bit of a random one for you today; I am writing today to share some updated information that we recently received following a state audit of our Shared Ride Taxi Program. As I understand it, our Shared Ride Taxi program has been providing a "corner stop service" that has been solely serving students getting to school. This program picks up at a certain location(s) and offers a ride at a reduced rate. The program is open to the general public; however, only students are using it. The concern DOT has about this is that the general public is not always aware of these corner stop locations. PTI (our shared ride taxi contractor) states that subscription riders are people that most often use this service, meaning they have a set schedule for their rides ahead of time. Because of this, DOT feels like it is potentially targeting one area of riders and being exclusive which then makes it not a shared ride service and therefore makes it ineligible for federal and state dollars.

I've inquired about alternate sources of funding paying for these riders (the city subsidizes this budget), and that is not an option unless we have taxi vehicles purchased with no federal dollars (which we don't). We've also inquired about having fixed routes that anyone can use; PTI does not feel that the City should implement a fixed route service at this time because we could run into the same issue as the corner service if students were the only ones to utilize the fixed routes. Unfortunately, where this leaves us, is that we are unable to continue the corner service for this school year and many school children use it. We should have data available early next week with more exact numbers on student use. While students can/will still continue to use the curb to curb option, there will be peak times and on-time arrivals and departures will be more difficult. Acknowledging our shared interest in working together to get children to school, we are asking the district - who knows the needs of students better than the city does - to provide suggested options that would work to meet the needs of students. We're hopeful that an option can be

produced that we're legally allowed to provide. The Transit Commission will have this topic on the July 31st agenda. We're hopeful the district will have options to share that will work for students that we can legally provide and are asking that those ideas be brought to that meeting. Our agenda packets are due July 26th (Megan can receive any materials from the district). Megan is also a resource to you all; if someone from your team is preparing ideas, Megan can certainly be the sounding board for if something will work or not.

I've cc'd in Carol Quest; Carol's team has been working on transportation as a part of our Community Health Improvement Plan so I wanted to ensure she had awareness of the outcome of this. Also cc'd is Megan Dunneisen; Megan is our City Clerk and she is responsible for the program, and Megan's Department Head, Mark Stevens (Finance Director). If you have any questions or suggestions on how to move forward, please let me know- we want to partner as best we can to serve these families.

Have a good weekend!

Thank you,

Emily McFarland
Mayor, City of Watertown
Phone: (920) 262-4000

From: Amanda Running To: Megan Dunneisen Subject: Corner Stop Info-Date:
Sunday, July 16, 2023 8:22:49 PM Attachments: corner bus route 2022-
23.pdf

. . .

Hello,

Below are the corner stops and route times we had for the 2022-23 school
year.

I also looked up average ridership for the corner stops. January - Early
March 17-19 students on average Mid March-May 11-15 students on average
The corner stops went to the Riverside Middle School and the High School-
elementary students that used transit have always been picked up at their
homes and dropped off at the school.

Amanda Running

Human Resources/DAPM 608-637-2599 ext 4

City of Watertown

Title VI/ADA Nondiscrimination Plan

Revised on: August 1, 2023

Adopted by: City of Watertown Common Council

Original Plan

Adopted on: May 6, 2014

This plan is hereby adopted and signed by:

City of Watertown

Executive Name/Title: Emily McFarland, Mayor

Executive Signature:

As a recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) the **City of Watertown** 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**)
- Demographic Representation Information (**Appendix 7**)
- Translated Vital Documents in Spanish – Notice of Nondiscrimination, Complaint Procedure, Complaint Form

Policy Statement

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

The **City of Watertown** receives federal financial assistance to provide shared-ride transportation service in the City of Watertown.

Policy Updates – Activity Log

The **City of Watertown** 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 Watertown**.

The **City of Watertown** will discuss Title VI/ADA Nondiscrimination Plan requirements with its third-party transit provider on an annual basis to ensure compliance with civil rights requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
May 25, 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	Megan Dunneisen	
September 5, 2017	Update Title VI Plan per WisDOT requirement	Cindy Rupprecht	
May 6, 2014	Develop Title VI Plan	Cindy Rupprecht	

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 Watertown'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:	Emily McFarland
Email:	emcfarland@watertownwi.gov
Phone:	920-262-4000

Civil Rights Coordinator

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

Name:	Megan Dunneisen
Email:	mdunneisen@watertownwi.gov
Phone:	920-262-4006

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City of Watertown'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 Watertown'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 Watertown's** Nondiscrimination requirements via the **City of Watertown'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 Watertown** 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 Watertown** 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 Watertown's** *Notice of Nondiscrimination* is provided in the following locations:

- ✓ Agency website https://www.ci.watertown.wi.us/residents/watertown_transit/index.php
- ✓ Public area of the agency office (Finance Department Bulletin Board)
- ✓ Inside vehicles

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **City of Watertown** at (920)262-4006 if additional information is needed in another language.

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

Complaint Procedure, Complaint Log, and Complaint Form

The **City of Watertown**, 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 Watertown** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **City of Watertown** 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 Watertown** 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 Watertown'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 Watertown Municipal Building 106 Jones Street Watertown WI 53094 Finance Department

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 Watertown's** *Complain Log* procedure and tracking mechanism to investigate, track and resolve complaints.

There has been a transportation related civil rights complaint filed with the City of Watertown. The City of Watertown used its complaint procedure to address, resolve, and close the complaint.

Complaint Form

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

Limited English Proficiency (LEP) Plan

As a recipient of federal USDOT funding, the **City of Watertown** 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 Watertown's Limited English Proficiency (LEP) Plan is shown in **Appendix 6**.

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

Demographic Representation Information

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

Appendix 1

Notice of Nondiscrimination to the Public

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

- ✓ Public area of the agency office
- ✓ Inside vehicles

Notice of Nondiscrimination

City of Watertown

- ✓ The **City of Watertown** 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 Watertown** 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 Watertown**.
- ✓ For more information on the **City of Watertown's** civil rights program, and the procedures to file a complaint, contact Megan Dunneisen 920-262-4006, (for hearing impaired, please use [Wisconsin Relay 711 - https://wisconsinrelay.com](https://wisconsinrelay.com)); email MDunneisen@watertownwi.gov; or visit our administrative office at 106 Jones Street, Watertown, WI 53094. For more information, visit https://www.ci.watertown.wi.us/residents/watertown_transit/index.php
- ✓ 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 920-262-4006.
Si se necesita informacion en otro idioma de contacto, 920-262-4006.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-262-4006.

Website Statement:

The **City of Watertown** 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 Watertown's** civil rights program, ADA obligations, and the procedures to file a complaint, contact Megan Dunneisen, email mdunneisen@watertownwi.gov; (920)262-4006. For hearing impaired, please use Wisconsin Relay 711 service <https://wisconsinrelay.com>.

Appendix 2

Complaint Procedure

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

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office Watertown Municipal Building 106 Jones Street Watertown WI 53094 Finance Department

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 Watertown** may file a complaint by completing and submitting the **City of Watertown's** Complaint Form.

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

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

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

The **City of Watertown** has **21** business days to investigate the civil rights complaint. If more information is needed to resolve the case, the **City of Watertown** may contact the complainant.

The complainant has **10** 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 **10** business days, the **City of Watertown** 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 **14** 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 920-262-4006.

Si se necesita informacion en otro idioma de contacto, 920-262-4006.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-262-4006.

Appendix 3

Complaint Log
List of Complaints, Investigations and Lawsuits²

The **City of Watertown** 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 Watertown**.

X There has been transportation related civil rights investigations, complaints and/or lawsuits filed against us. *Information available upon request to the City Clerk.*

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 Watertown** 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 Complaint ³	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

Appendix 4

Complaint/Comment Form

City of Watertown 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 to Megan Dunneisen MDunneisen@watertownwi.gov; or in person at the address below.

City of Watertown

106 Jones Street

P.O Box 477

Watertown, WI 53094

You may also call us at 920-262-4006. 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)
--------------------------------------	---------------------------------------	--	---

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
---	------------------------------	-----------------------------

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
---	------------------------------	-----------------------------

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
------------------------------------	-------------------------------------	-------------------------------------	--------------------------------

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

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

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<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

Section F: Desired Outcome

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

Click or tap here to enter text.

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

Click or tap here to enter text.

Section G: Signature

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

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 5

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

Strategies

In order to promote inclusive public participation, the **City of Watertown** 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 Watertown** 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 new ways to providing public input opportunities.

Participation Techniques

The **City of Watertown** 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 Watertown** 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 Watertown** 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 Watertown** 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.

https://www.ci.watertown.wi.us/residents/watertown_transit/index.php

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	Website	Website	City and PTI	www.ci.watertown.wi.us/residents/watertown_transit/index.php
Ongoing	Local Group Outreach	Verbal communications	Phone calls	PTI	PTI with local groups to share about public transit and how it may serve community members- example, Unite Way, they set up a charge account to be able to pay for those in need to get to the Food Pantry.
Bi-Monthly	City Council Meetings	Website, Public Facilities	Public Meeting	City	Information is available on the City of Watertown website
Every Other Month	Transit Commission	Website, Public Facilities	Public Meeting	City	Discussion on Transit topics, recommendations to the City Council on Transit topics. Information is available on the City of Watertown website

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

Appendix 6

Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, the **City of Watertown** 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 Watertown** 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 Watertown** 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 Watertown**.

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 Watertown** 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, the **City of Watertown** 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 Watertown 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 Dodge County and Jefferson County. Some of these languages include Spanish, German, Russian, Polish, Chinese, Hmong, Laotian, Other Native North American Languages, Hindi, Urdu, 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 Watertown** must provide translation of vital documents in written format for non-English speaking persons.

- ✓ In **Jefferson County**, with a population estimate of 79,616, 1,404 persons have identified themselves as Spanish speaking and “speaks English less than very well.”
- ✓ In **Dodge County**, with a population estimate of 84,033, 830 persons have identified themselves as Spanish speaking and “speaks English less than very well.”

The Spanish language group in Jefferson county is greater than the 1,000 persons threshold of the population. This means the **City of Watertown** is required to provide written translation of vital documents (Notice of Non-Discrimination, Complaint Procedure and Complaint Form) in Spanish.

All other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **City of Watertown** is not required to provide written translation of vital documents in these languages. In the future, if the **City of Watertown** 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 Watertown** and its contractor provides transportation service for the **City of Watertown**.

The **City of Watertown** 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 Watertown** 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 Watertown** staff, policy board members, and contractors have had (0) requests for interpreters and (0) requests for translated *transit related* program documents in any setting.

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

The **City of Watertown** with assistance from its contractor, 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 Watertown’s** 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 <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

If a language barrier were to exist, **City of Watertown** 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 Watertown** staff to assist LEP individuals. Additional languages can be added, as needed, to match the

demographic changes of the **City of Watertown's** service area. The languages included in the "*I Speak*" *Language Identification Card* below represent many of the languages spoken within the **City of Watertown** 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.

City of Watertown 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. A transportation system is a key link to connecting LEP persons to these essential services.

City of Watertown has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities and vehicles and providing information to the public on security awareness or emergency preparedness.

City of Watertown 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.

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. The **City of Watertown** will contact state and local units of government and community resources for assistance in translation services.

Even though the **City of Watertown** does not have a separate budget for LEP outreach, it continuously explores ways to implement low-cost 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 low-cost 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 Watertown's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

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

City of Watertown 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 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 **City of Watertown** on limited basis. Instead, **City of Watertown** 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

The **City of Watertown** 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 Watertown** to request information in another language.
- ✓ When encountering LEP persons directly, **City of Watertown** will use the “*I Speak*” *Language Identification Card* to identify the language and communication needs of LEP persons. **City of Watertown** 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 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

City of Watertown will review the following items on an annual basis:

- ✓ The number of documented LEP person contacts.
- ✓ How the needs of LEP persons have been addressed.
- ✓ Determine whether the need for translation services has changed.
- ✓ Determine with existing language assistance services are effective and sufficient to meet the needs of LEP persons.
- ✓ Determine whether complaints have been received concerning the **City of Watertown’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 Watertown** staff:

- ✓ Information on the **City of Watertown’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.

Appendix 7

Demographic Representation Information⁴A. 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 Watertown's** Common Council is responsible for transportation decision making with recommendation from the Transit Commission. The Council is made up of 9 elected District Alderpersons and one elected Mayor. The Transit Commission consists of four citizen members and appointed by the Mayor and approved by the Common Council for four-year terms and one Alderperson Representative appointed by the Mayor and approved by the Common Council for a one-year term.



Body	Caucasian	Hispanic/ Latino	Black/ African American	Asian American	Native American	Some Other Race	No Response
Dodge County Population	89.6%	5.01%	2.7%	.67%	.3%	1.77%	---
Jefferson County Population	89.4%	7.25%	.7%	.5%	.1%	2.01%	---
Watertown City Council	Membership on the Common Council is by election.						
Watertown Transit Commission <i>4 citizen members appointed by Mayor 1 Council Member Representative</i>	1						4

B. Efforts to Encourage Minority Participation

City of Watertown understands diverse representation on committees and councils results in sound policy reflective of its entire population. As such, **City of Watertown** encourages participation of all its citizens. As vacancies on the Transit Commission becomes available, **City of Watertown** will make efforts to encourage and promote diversity. To encourage participation, the **City of Watertown** will continue to reach out to community organizations to connect with all population groups in its service area. In addition, **City of Watertown** will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

⁴ If **City of Watertown** has transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by **City of Watertown**, Title VI regulations require **City of Watertown** 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

Name of board, commission, council, etc.

Date:

Dear Member,

The **City of Watertown**, 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 **City of Watertown** 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 **City of Watertown**, 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 **City of Watertown** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI/ADA plan requirements.

Título VI – El aviso de no discriminación a el público⁷

El aviso de no discriminación de la **City of Watertown** es el siguiente:

El Aviso de no discriminación

City of Watertown

- ✓ La **City of Watertown** se compromete a garantizar que ninguna persona sea excluida, participe, se le nieguen los beneficios o se la discrimine por motivos de raza, color, origen nacional, discapacidad, sexo, edad, religión, estado de ingresos o competente limitado del inglés en todos y cada uno de los programas, actividades o servicios administrados por la **City of Watertown** de conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y las autoridades de no discriminación relacionadas.
- ✓ Cualquier persona que crea que ha sido agraviada por práctica discriminatoria ilegal puede presentar una queja con la **City of Watertown**.
- ✓ Para obtener más información sobre el programa de derechos civiles de la **City of Watertown**, y los procedimientos para presentar una queja, comuníquese con 920-262-4006, (para personas con problemas de audición, por favor utilice el servicio Wisconsin Relay 711 - <https://wisconsinrelay.com>): envíe un correo electrónico a Megan Dunneisen MDunneisen@watertownwi.gov; o visite nuestra oficina administrativa a la dirección 106 Jones Street, Watertown, WI 53094. Para obtener más información, visite https://www.ci.watertown.wi.us/residents/watertown_transit/index.php
- ✓ Una demandante puede presentar una queja directamente con la Administración de Federal de Tránsito por presentado una queja con la Oficina de Derechos Civiles, atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 920-262-4006.
Si se necesita informacion en otro idioma de contacto, 920-262-4006.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-262-4006.

El aviso de no discriminación la **City of Watertown** se publica en los siguientes lugares

- ✓ Sitio web de la agencia https://www.ci.watertown.wi.us/residents/watertown_transit/index.php
- ✓ Áreas públicas de la oficina de la agencia (área común, salas de reuniones públicas, etc.)
- ✓ Vehículos interiores
- ✓ Refugios de tránsito y estaciones

⁷ Las regulaciones del Título VI requieren la **City of Watertown** Informe a los clientes y al público sobre sus derechos bajo el Título VI mediante la publicación de un *Aviso de no discriminación*. El aviso público debe incluir:

- ✓ Una declaración de no discriminación;
- ✓ Información sobre cómo solicitar información adicional sobre las obligaciones del Título VI de la agencia, incluida información sobre cómo presentar una queja, la ubicación del formulario de queja, etc.
- ✓ Información sobre cómo solicitar información del Título VI en otro idioma, si es necesario.

El *Aviso de no discriminación* debe publicarse en los siguientes lugares: sitio web, áreas públicas de las agencias, oficinas, interiores de vehículos, guías / horarios de pasajeros y complejos de tránsito.

El Procedimiento de Quejas

El Procedimiento de Quejas de la **City of Watertown** está disponible en los siguientes lugares:

- ✓ Sitio web de la agencia, ya sea como referencia en el aviso al público o en su totalidad.
- ✓ Áreas públicas de la oficina de la agencia (área común, salas de reuniones públicas, etc.)
- ✓ Disponible en idiomas apropiadas para poblaciones LEP, cumpliendo con el umbral de puerto seguro.

Cualquier persona que crea haber sido discriminado por motivos de raza, color, origen nacional, discapacidad, sexo, edad, religión, estado de ingresos o dominio limitado del inglés (LEP) por parte de la **City of Watertown** puede completar un formulario de queja y entregar el a de la **City of Watertown**.

El formulario de queja también se puede usar para entregar quejas generales a la **City of Watertown**.

De la **City of Watertown** investiga las quejas recibidas no más de 180 días hábiles después del presunto incidente. De la **City of Watertown** procesará las quejas que estén completas.

Una vez que se recibe la queja, la **City of Watertown** la revisará y trabajará para resolverla de manera informal, si es posible.

Si la queja garantiza un proceso formal de queja de derechos civiles, la **City of Watertown** seguirá los pasos enumerados en este procedimiento de queja. La **City of Watertown** también puede utilizar este procedimiento formal para atender quejas generales. Si la **City of Watertown** determina que tiene jurisdicción, el demandante recibirá una carta de reconocimiento que indica que la queja será investigada por la **City of Watertown** como una queja de derechos civiles.

La **City of Watertown** tiene **21** días hábiles para investigar la queja de derechos civiles. Si se necesita más información para resolver el caso, la **City of Watertown** puede contactar al demandante.

El/La demandante tiene **10** días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Si el demandante no contacta al investigador o no envía la información adicional dentro de los **10** días hábiles, la **City of Watertown** puede cerrar el caso administrativamente. Un caso puede cerrarse administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el investigador revise la queja, se emitirá una de dos (2) cartas al demandante: una carta de cierre o una carta de descubrimiento.

- ✓ Una carta de conclusión resume las acusaciones y establece que no hubo una violación del Título VI que el caso se cerrará.
- ✓ Una carta de descubrimiento resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si ocurrirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción.

Si el demandante desea apelar la decisión, tiene **14** días hábiles después de la fecha de la carta o la carta de descubrimiento para hacerlo.

Una persona también puede entregar una queja directamente ante la Administración Federal de Tránsito, en la Oficina de Derechos Civiles de la FTA, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 920-262-4006.

Si se necesita información en otro idioma de contacto, 920-262-4006.

Yog muaj lus qhia ntxiv rau lwmm hom lus, hu rau 920-262-4006

City of Watertown – Formulario de Complementos/Quejas

La **City of Watertown** Está comprometido a proveer usted con servicios de transportación segura y fiable y queremos sus comentarios. Por favor usa este formulario por sugerencias, quejas y complementos.

Por favor, entregar este formulario electrónicamente a Megan Dunneisen mdunneisen@watertownwi.gov o en persona a la dirección debajo.

City of Watertown
106 Jones Street
Watertown, WI 53094

También, puede nos llamar a 920-262-4006. Por favor, provea su información de contacto para recibir una respuesta.

Sección A: Requisitos de formato accesible

Por favor, verifique el formato preferido para este documento.

<input type="checkbox"/> Letra grande	<input type="checkbox"/> TDD o Relé	<input type="checkbox"/> Grabación de audio	<input type="checkbox"/> Otra (si está seleccionado, indique qué tipo de formato necesita en el cuadro debajo)
---------------------------------------	-------------------------------------	---	--

Haga clic o toque aquí para introducir el texto

Sección B: Información de contacto

Nombre <input type="text"/>	Número de teléfono (incluyendo el Código de área) <input type="text"/>
Dirección <input type="text"/>	Ciudad <input type="text"/>
Estado <input type="text"/>	Código postal <input type="text"/>

Correo electrónico

¿Está presentado esta queja en su propio nombre?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
--	-----------------------------	-----------------------------

Si no, por favor provea el nombre y la relación de la persona por la que se queja y por qué está completando el formulario en su nombre en el cuadro a continuación.

Por favor, confirme que ha obtenido el permiso del partido agraviado si está completando por un tercer partido.

☐ Sí

☐ No

Sección C: Tipo de comentario

¿Qué tipo de comentario estás proveyendo? Por favor, marque qué categoría se aplica mejor.

☐ Queja

☐ Sugerencia

☐ Complemento

☐ Otra

¿Cual de los siguiente describe la natura del comentario? Por favor, marque uno o más de las casillas de verificación.

☐ Raza

☐ Color

☐ Origen Nacional

☐ Religión

☐ Edad

☐ Sexo

☐ Servicio

☐ Estado de Ingresos

☐ Competente limitado del inglés (C.L.I)

☐ Ley de estadounidenses con discapacidad (L.E.D.)

Sección D: Detalles de comentario

Por favor, responda a las preguntas debajo sobre su comentario.

¿Ocurrió el incidente en el siguiente tipo de servicio? Por favor marque cualquier casilla que pueda aplicar.

☐ Paratransit

☐ Taxi compartido

☐ Autobús

¿Cuál fue la fecha del suceso?

Haga clic para agregar la fecha en el siguiente formato:
Día, mes, año

¿Cuál fue la hora del suceso?

Haga clic para agregar su hora preferido

¿Qué es el nombre o la identificación del empleado o empleados involucrados?

Haga clic o toque aquí para introducir el texto

¿Qué es el nombre o la identificación del otros involucrados, si procede?

Haga clic o toque aquí para introducir el texto

¿Qué es el numero o el nombre de la ruta en la que estaba, si procede?

Haga clic o toque aquí para introducir el texto

¿Qué era la dirección o el destino al que se dirigía ocurrió el suceso, si procede?

Haga clic o toque aquí para introducir el texto

¿Donde estaba la ubicación del suceso?

Haga clic o toque aquí para introducir el texto

¿El uso de una ayuda de movilidad estuvo involucrado en el suceso?

☐ Sí

☐ No

Por favor, añada detalles descriptivos sobre el suceso.

Haga clic o toque aquí para introducir el texto

En la casilla de baja, por favor explique tan claramente como sea posible lo que ocurrió y por qué cree que fue discriminado.

Haga clic o toque aquí para introducir el texto

Sección E: El seguimiento

¿Podemos contactarlo si necesitamos más detalles o información?

☐ Sí

☐ No

En caso afirmativo, ¿cómo le gustaría ser contactado? Por favor, seleccione su forma de contacto preferida en una casilla de baja.

☐ Teléfono

☐ Correo electrónico

☐ Correo

Si prefiere que lo contactemos por teléfono, indique el mejor día y hora para comunicarse con usted.

Haga clic para agregar su hora preferido

Haga clic para agregar su día preferido

Sección F: Resultado deseado

Por favor, haga una lista de baja los pasos le gustaría tomar para que tratar con el conflicto o el problema.

Haga clic o toque aquí para introducir el texto

Si aplicable, haga una lista de baja todas las agencias adicionales con las que ha presentado esta queja, como las agencias federales, estatales o locales, o ante cualquier tribunal federal o estatal. Incluya la información de contacto a donde se envió la queja.

Haga clic o toque aquí para introducir el texto

Sección G: Firma

Por favor, adjunte algunos documentos que tenga que apoya la denuncia. Luego, feche y firme este formulario y envíelo a La City of Watertown.

Nombre Haga clic o toque aquí para introducir el texto

Fecha: Haga clic para agregar la fecha en el siguiente formato: Día, mes, año

Firma Haga clic o toque aquí para introducir el texto

**RESOLUTION TO
ADOPT UPDATED TITLE VI PLAN**

**SPONSOR: ALD. SCHMID
FROM: TRANSIT COMMISSION**

WHEREAS, the City of Watertown is a recipient of Federal Transit Administration (FTA) Grant dollars either directly from FTA or through the Wisconsin Department of Transportation (WisDOT) for Transit systems, or other Federal Grant programs; and,

WHEREAS, the State of Wisconsin and City of Watertown must comply with the Title VI of the Civil Rights Act of 1964.

NOW, THEREFORE, BE IT RESOLVED BY THE COMMON COUNCIL OF THE CITY OF WATERTOWN, WISCONSIN: that the Common Council of the City of Watertown hereby adopts the attached updated Title VI Plan.

That this Resolution shall be in full force and effect upon its passage and adoption.

	YES	NO
DAVIS		
LAMPE		
BOARD		
BARTZ		
BLANKE		
SMITH		
SCHMID		
WETZEL		
MOLDENHAUER		
MAYOR MCFARLAND		
TOTAL		

ADOPTED August 1, 2023

CITY CLERK

APPROVED August 1, 2023

MAYOR



CORRECTIVE ACTION PLAN (CAP) MATRIX

WisDOT Compliance Site Review

Subrecipient: City of WatertownDate: April 14, 2023 April 14, 2023;
amended 7/6/23

DIRECTIONS: Please review the recommended actions column below. Fill in the blank "Action Steps" boxes by describing what action the subrecipient has taken to address the Findings (Findings – Action Step must be completed. Advisory are for your information.). For particular sections, WisDOT and/or RLS will provide supplementary technical assistance and templates when needed. Return CAP (in Word format) to cglover@rlsandassoc.com within 2 weeks for review.

SECTION 1: PROGRAM MANAGEMENT/OVERSIGHT – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Legal Authority FTA Circular 5010.1D	1. FINDING: WisDOT advises the subrecipient that it should enhance its oversight of the contractor by periodically inspecting the contractor operated Section 5311 funded vehicles to ensure they are properly maintained and equipped with the required safety equipment.	City to connect with Watertown Transit to do inspections on vehicles	90 days 8/7/2023	City to contact Streets Department and ask if a mechanic is available to do periodic inspection of the Transit Fleet.

SECTION 2: FINANCIAL MANAGEMENT – ACTION REQUIRED				
Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Accounting Practices/Internal Controls 2 CFR Part 200.302 (b)(1)-(3) - "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"	2. FINDING: WisDOT advises the subrecipient to amend its Uniform Accounting Procedures Manual to include the following federal requirement: <ul style="list-style-type: none">Procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles and the terms and conditions of the Federal award consistent with 2 CFR part 200.302(b)(7).	A revision of Watertown's purchasing policy is underway. We will incorporate suggested language on cost availability for charges against federal funds.	90 days 8/7/2023	Being added into purchasing policy

SECTION 3: PROCUREMENT – NO RECOMMENDED ACTION

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

SECTION 4: ASSET MANAGEMENT – ACTION REQUIRED

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Continuing Control of Assets (Vehicles) 2 CFR Part 200.313	3. FINDING: The review determined that there is inconsistency with the performance of preventive maintenance events. The 5,000-mile policy resulted in 68% on time, 24% late, and 8% early for oil changes on vehicle nos. 53 and 59. The subrecipient should strive to conduct oil changes consistent with the stated mileage interval. On time for the 5,000-mile interval would be 10% on either side of the stated interval (4,500-5,500 miles). FTA regulations call for at least 80% of PM events to be performed on time.	Follow up with PTI to make sure vehicles are on track with regular oil changes and other maintenance to be done within the recommended mileage interval. PTI to send QTR reports on maintenance work to fleet.	90 days 8/7/2023	PTI will work to get vehicles scheduled for maintenance work timely and report to the city on status

SECTION 5: SERVICE AND OPERATION – NO RECOMMENDED ACTION

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

SECTION 6: SCHOOL BUS AND CHARTER – ACTION REQUIRED

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
School bus transportation 49 U.S.C. 5323(f) School bus operations 49 CFR 605	School bus. 4. Finding: WisDOT found that the corner stop service provided trips exclusively to students. As outlined in the letter dated 7/6/23 from Ian Ritz, WisDOT requires the City to: 1) discontinue the use of federal and state public transit operating funds and federally funded public transit vehicles in providing corner stop service utilized exclusively by students; and 2) provide WisDOT with ridership reports and trip denial reports on a quarterly basis.	The City of Watertown will stop the corner service option to riders.	90 days from 7/6/23 (10/4/23)	Meeting with PTI on 7/12/2023. The corner service will not be used going forward. Topic will be relayed to the transit commission on 7/31/2023. City will discuss with City Attorney on contract stand points.

SECTION 7: CIVIL RIGHTS – ACTION REQUIRED

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Title VI FTA Circular 4702.1B	<p>5. FINDING: WisDOT advises the subrecipient to update its Title VI Plan utilizing the WisDOT provided template. Note that the updated plan should be reviewed and approved by WisDOT before taking it before the subrecipient's Governing Body for approval and adoption. WisDOT will provide assistance with this task.</p> <p>http://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pqms/transit/compliance/title6.aspx</p>	Watertown has an upcoming video call with Becky at DOT to address these concerns. (May 25) City to update the Title VI policy.	90 days 8/7/2023	Updated Policy sent to Becky on 7/5 for review.
	<p>6. FINDING: The review found that the Contractor's website (https://passengertransit.net/PassengerCity?Name=Watertown) did not include a Title VI/ADA non-discrimination statement with no information regarding filing a complaint and who to contact for more information on the procedures for filing a Title VI or ADA complaint. While the subrecipient's website contained a Title VI non-discrimination statement and information for filing a complaint, it did not address ADA discrimination.</p> <p>With there being federal requirements for the posting of both Title VI and ADA non-discrimination statements and complaint procedures/information, WisDOT has developed a joint Title VI/ADA non-discrimination statement which also addresses the filing of a complaint. This statement is provided as an attachment to the email transmitting the CAP to the subrecipient.</p>	Watertown will put both Title VI and ada non-discrimination statement on website	90 days 8/7/2023	Website has been updated. Title VI update going to Council Aug 1. Complaint form added to Website and available at City Hall. (English and Spanish)

SECTION 8: AMERICANS WITH DISABILITIES ACT (ADA) – RECOMMENDED ACTION

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
Americans with Disabilities Act (ADA) 49 CFR part 37.3	7. ADVISORY: WisDOT advises the subrecipient to include the Wisconsin Relay Number on the City and contractor's websites to assist hearing impaired individuals.	PTI currently has on their website. Watertown has added to theirs.	N/A	Has been updated

SECTION 9: MISCELLANEOUS PROVISIONS – NO RECOMMENDED ACTION

Compliance Area/Topic	Recommended Action	Action Steps	Timeline	Status
	None			

Signature section to be complete when ALL action steps are approved and marked complete by WisDOT

Subrecipient Acknowledgement of Completed Corrective Action and WisDOT Approval

I hereby acknowledge that all action items as recommended by the Wisconsin Department of Transportation have been completed in cooperation and under the direction of the WisDOT Compliance Oversight Manager.

Subrecipient Name/Title	RLS & Associates, Inc. Name/Title	Date	