

Door County

Title VI Nondiscrimination Plan

Revised on: January 6, 2026

Adopted by: Door County Human Services Board
(oversight board for Door County Dept. of Human
Services which administers the Section 5311 grant
as a WisDOT sub-recipient)

Original Title VI Plan

Adopted on: May 3, 2014

This plan is hereby adopted and signed by:

Door County

Executive Name/Title: Ken Pabich, Door County Administrator

Executive Signature:



As a recipient of USDOT Federal Transit Administration (FTA) funding, per FTA Circular 4702.1B Door County is required to prepare a Title VI Nondiscrimination Plan including the following elements:

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

Policy Statement

Door County 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 **Door County** in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

Door County receives federal financial assistance to provide transportation service in (Door County) and to purchase vehicles to provide rides to elderly and disabled individuals.

Policy Updates – Activity Log

Door County will review its policy on an annual basis to determine if modifications are necessary. The table below outlines the Title VI Plan reviews/revisions made by **Door County**.

As applicable, **Door County** will discuss Title VI Nondiscrimination Plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI Nondiscrimination requirements.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
1/6/26	Updated December plan & forms for new County email from .us to .gov	Pam Busch	WisDOT approved 1/6
10/28/25	Reviewed Title VI Plan and Update	Pam Busch	Update approved 12/8
12/23/24	Reviewed Title VI Plan	Pam Busch	
11/11/24	Discussed ticket sales vs electronic payment and reducing 30 minute pickup window to 20 minutes in the City of Sturgeon Bay.	Pam Busch	Mark Jones, Tina Gehrke, Susan Lewis & Pam Busch met by phone
7/11/24	Review scheduling for DCC & D2D riders who have special needs, phone meeting	Pam Busch	Mark Jones, Tina Gehrke, & Pam Busch met by phone
3/13/24	Review / Visit with SRT Vendor	Pam Busch	In-Person mtg at the ADRC with Abby Vans (Mark, Susan, Peggy)
11/6/23-11/7/23	Review Title VI Plan and Update.	Pam Busch	
11/16/22-11/28/22	Review Title VI Plan and Update.	Pam Busch	

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](#)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes
11/16/21	Compliance Site Review meeting, in-person for County & Abby Vans staff with virtual attendance by reviewers	Pam Busch	
10/13/21 – 11/15/21	Compliance Site Review work	Pam Busch	Various calls, emails, etc. to complete the review process.
10/25/21	Random vehicle inspection (Van 618) for Compliance Site Review	Pam Busch	Driver Dan McLean brought in vehicle for inspection. Title VI Public Notice was visible in the van
8/26/21	Review	Pam Busch	Phone mtg with Abby Vans (Mark, Tina, Susan, Cindy) re: clarification of zone schedule, zone fares. 9 – 9:30 am
12/10/2020	Review plan and updated the Public Participation Plan section and Title VI Complaint Form	Pam Busch	
3/19/20	Review	Pam Busch	Phone mtg with Mark Jones & Tina Gehrke re: complaint / incident reporting and tracking process
12/12/19	Site Visit to Abby Vans Inc., Neillsville WI	Pam Busch	In-person visit with Mark & Peggy Jones & Tina Gehrke.
11/22/19	Review/Update	Pam Busch	Updated original approved policy from 2014. Changes are effective 1/1/20.
2018	Review/Update	Robin Mark	Due to the ADRC move and a significant increase in consumers, a review was not done in 2018.
5/13/2014	Develop Title VI Plan	Maureen Murphy	

Contact Information/Program Administration

Chief Executive

Door County'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:	Ken Pabich, County Administrator
Email:	kpabich@co.door.wi.gov
Phone:	920-746-2303

Civil Rights Coordinator

Door County's Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with **Door County'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 **Door County's** Chief Executive.

Name:	Pam Busch, Transportation Manager
Email:	pbusch@co.door.wi.gov
Phone:	920-746-5982

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

- ✓ Program Administration
 - Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
 - Develop and implement **Door County'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 **Door County's** Nondiscrimination requirements via **Door County'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 **Door County** as a recipient of federal financial assistance to notify the public of its obligations under U.S. DOT Title VI regulations and the protections against discrimination afforded to them by Title VI.

Title VI regulations require **Door County** to inform the public of their rights under Title VI by posting a *Notice of Nondiscrimination*. The *Notice of Nondiscrimination* should be posted in the following locations: agency website, public 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 obligations, including information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI information in another language.

Door County's *Notice of Nondiscrimination* is provided in the following locations: *(list all that apply)*

- ✓ Agency website - <https://www.doorcountyconnect.com/1060/Civil-Rights-Compliance>
- ✓ Public area of the agency office (common area, public meeting rooms, etc.)
- ✓ Inside vehicles (Door 2 Door Rides and Door County Connect)

On English versions of the *Notice of Nondiscrimination*, a sentence is included in Spanish and Hmong to contact the **Door County** at 920-746-5982 if additional information is needed in another language.

To view a copy of **Door County's** *Notice of Nondiscrimination*, please see **Appendix 1**.

Complaint Procedure and Complaint Form

Door County, 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 **Door County** may file a civil rights complaint.

Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external **Door County** 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 **Door County** 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.

Door County's complaint procedure is shown in **Appendix 2** and made available in the following locations:

- ✓ Agency website, either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office – Hard Copy available in the Transportation Department.

A copy of **Door County's Complaint Form** is shown in **Appendix 3**.

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 4 is **Door County's** procedure and tracking mechanism to investigate, track and resolve complaints.

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with **Door County**.

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 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.

A copy of **Door County's Public Involvement Plan** is shown in **Appendix 5**.

Limited English Proficiency (LEP) Plan

As a recipient of federal USDOT funding, **Door County** 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.

A copy of **Door County's Limited English Proficiency (LEP) Plan** is shown in **Appendix 6**.

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

Demographic Representation Information

Door County 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.

A copy of **Door County's Minority Representation Information** is shown in **Appendix 7**.

Title VI - Notice of Nondiscrimination to the Public

Door County's Notice of Nondiscrimination is as follows:

Notice of Nondiscrimination

Door County

- ✓ **Door County** 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 **Door County** 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 **Door County**.
- ✓ For more information on the **Door County's** civil rights program, and the procedures to file a complaint, contact 920-746-5982, (TTY 855-828-2372); email pbusch@co.door.wi.gov; or visit the Transportation Department at the ADRC, 914 N 14th Avenue, Sturgeon Bay, WI 54235. For more information, visit <https://www.doorcountyconnect.com/>
- ✓ 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, 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 920-746-5982.
Si se necesita informacion en otro idioma de contacto, 920-746-5982.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-746-5982.

Complaint Procedure

Door County'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 – Hard copy in Transportation Department and vehicles.
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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 **Door County** may file a complaint by completing and submitting **Door County's** Complaint Form.

The Complaint Form may also be used to submit general complaints to **Door County**.

Door County investigates complaints received no more than 180 calendar days after the alleged incident. **Door County** will process complaints that are complete.

Once the complaint is received, **Door County** will review the complaint and work to resolve the complaint informally, if possible.

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

Door County has **30** business days to investigate the civil rights complaint. If more information is needed to resolve the case, **Door County** 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, **Door County** 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 violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, the complainant has **10** business days after the date of the letter 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 920-746-5982.

Si se necesita informacion en otro idioma de contacto, 920-746-5982.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-746-5982.

Complaint/Comment Form

Door County is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at pbusch@co.door.wi.gov or in person at the address below.

Door County Transportation Dept.

Attn: Pam Busch
914 N 14th Avenue
Sturgeon Bay WI 54235

You may also call us at 920-746-5982. 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"/> 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

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 Door County Transportation Dept, Attn: Pam Busch, 914 N 14th Ave., Sturgeon Bay WI 54235 or email to pbusch@co.door.wi.gov.

Name Click or tap here to enter text.

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

Signature Click or tap here to enter text.

Appendix 4

List of Complaints, Investigations and Lawsuits²

The **Door County** maintains a log to track and resolve transit related 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 **Door County**.

Because **Door County** has had no transportation related civil rights complaints, investigations, or lawsuits, the table below has no entries.

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

Type Complaint Investigation Lawsuit	Date 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

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

Strategies

To promote inclusive public participation, **Door County** 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 **Door County** 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

Door County 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 (Healthy Living Fairs, Caregiver Conferences, etc.)
- Advisory meetings and committees
- Direct mailings (letters, fliers, etc.)
- Website and social media
- Project-specific newsletter articles and ADRC monthly and County quarterly newsletters
- 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

Door County maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, Door County 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 Door County are summarized below. Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e., information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities (Past three years, see prior plans for later activity)					
Event Date	Staff Members Responsible	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Notes
10/21/25	Pam Busch Ken Pabich	Annual 85.21 Public Hearing	Public Notice- Peninsula Pulse 10/3/25	Public Hearing	2026 85.21 grant application approved.
10/14/25	Pam Busch	Newsletter – Qtr 3	Email to all municipalities in Door County, added to County Board and Administrative mtg pkts, shared via social media		
9/22/25	Pam Busch	Transportation Fair – D2D 15 th Anniversary	8/25/25-9/22/25 Media Releases, Paid Ads, social media, email blasts, etc.		25+ businesses and organizations were on-site. Attendees have requested another event.
7/14/25	Pam Busch	Newsletter – Qtr 2	Email to all municipalities in Door County, added to County Board and Administrative mtg pkts, shared via social media		
7/8-7/22/25	Pam Busch	Rural Transit Day	Media release and paid ads, social media	No Cost Fare Day 7/16/25 & Driver Picnic 7/22/25	
5/28-6/9/25	Pam Busch	DC Community Foundation Grant	Media Release, Social Media		
5/13/25	Pam Busch	Newsletter – Qtr 1	Email to all municipalities in Door County, added to County Board		

Summary of Outreach Activities (Past three years, see prior plans for later activity)

Event Date	Staff Members Responsible	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Notes
			and Administrative mtg pkts, shared via social media		
5/8/25	Pam Busch	Presentation at Door County Unit-WI Towns Assoc Mtg		In-Person Mtg	
4/9/25	Pam Busch	Presentation at Door-Tran's Annual mtg		In-Person Mtg	
3/17/25	Pam Busch	Presentation at the Sevastopol Town Mtg		In-Person Mtg	
2/19/25	Pam Busch	Presentation at Dept of Health & Human Services all staff meeting		In-Person Mtg	
2/11/25	Pam Busch	News Story	NBC Channel 26 did a full new story that was publishing during the news and on-line. Shared to social media		
2/9/25	Pam Busch	Hybrid & Sedan added to D2D	Media Release, Social Media		
2/3/25-2/9/25	Pam Busch	News Story	Door County Knock completed a full news story about D2D & DCC		
1/22/25	Pam Busch	End of Year 2024 newsletter	Email to all municipalities in Door County, added to County Board and Administrative mtg pkts, shared via social media		Implemented quarterly newsletter
10/28/24	Pam Busch	Veterans Day & Voting Rides	Media Release, social media	No cost fares for Veterans, LWV covers voting costs	
10/15/24	Pam Busch Ken Pabich	Annual 85.21 Public Hearing	Public Notice-Peninsula Pulse 10/4/24	Public Hearing	2025 85.21 grant application approved.
7/8-7/16/24	Pam Busch	Rural Transit Day	Media release and paid ads, social media	No Cost Fare Day 7/16/24 & Driver Picnic 7/15/24	

Summary of Outreach Activities (Past three years, see prior plans for later activity)

Event Date	Staff Members Responsible	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Notes
6/21/24	Pam Busch	WDOR Radio Talk Show		On Air	
6/12-6/17/24	Pam Busch	2 New D2D Vans, on-site viewing	Media Release, social media		
5/21/24	Pam Busch	Presentation at Administrative Committee Mtg		In-Person Mtg	
4/23/24	Pam Busch	Presentation at Destination Door County J-1 Employer Forum		In-Person Mtg	
4/23/24	Pam Busch	Presentation to the County Board		In-Person Mtg	
4/10/24	Pam Busch	Presentation at Door-Tran's Annual Mtg		In-Person Mtg	
1/29-1/31/24	Pam Busch, Mariah Goode, Becky Kerwin	Coordinated Public Transportation Plan Meetings for public input	1/8/24 Media release, mailings, social media, email, website	In Person Mtgs 1/29 was in the evening, 1/31 was in the morning	

Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, **Door County** 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) **Door County** 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

Door County 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 **Door County**.

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, **Door County** 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, **Door County** 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 Door County program or service.

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



Door County LEP
Data 2015 Estimate.j

The US Census Bureau – American Fact Finder (2011-2015) data shows there are numerous languages spoken in Door County. Some of these languages include Spanish, Chinese, Italian, Portuguese, German, Russian, Japanese, French, Polish, Hungarian, Greek, Yiddish, Other West Germanic Languages, and Other Slavic and Other Asian languages. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), **Door County** must provide translation of vital documents in written format for non-English speaking persons.

In Door County, with a population estimate of 26,636, 133 persons have identified themselves as Spanish speaking and “speaks English less than 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 **Door County** 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, **Door County** is also not required to provide written translation of vital documents in these languages.

In the future, if **Door County** 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.

Door County and its contractor provides transportation service in **Door County**.

Door County reviewed the frequency with which its staff, policy board, and contractors have, or could have, contact with LEP persons in the conduct of **Door County** activities. This includes a review of documented phone inquiries, office visits, and encounters at public meetings and community events. **Door County's** transit services provided over 46,330 rides in 2024 and may exceed this in 2025. The County for DCC has encountered (0) LEP person's and Abby Vans indicated they have encountered (1) one LEP person(s) using the D2D service in 2024 and (0) zero to day in 2025.

Door County staff, policy board members, and contractor staff will be trained on what to do when they encounter a person with limited English proficiency.

Door County 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 **Door County'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 (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
2025		None					
6/22/24		Broken English		Ride Grocery Shop	No	Lisa & Tina	
2023		None					
April 2022		Spanish with some broken English	939-325-0715	Ride to Green Bay	No	Dawn Noah, Abby Vans	D2D doesn't go out of Door County, unable to assist with ride to Green Bay.
2021		None					
2020		1 Chinese & 1 Spanish speaking		Ride Provided through D2D	No	Customer Service Rep / Driver	
2019		1 Spanish speaking		Ride provided through D2D	No	Customer Service Rep / Driver	

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

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	如果说中国在方框内打勾	Chinese
	Marchi questa casella se legge o parla italiano.	Italian
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	日本語を読んだり、話せる場合はここに印を付けてください。	Japanese
	Отметить этот флажок, если вы говорите по-русски	Russian
	Assinale este quadrado se você lê ou fala português.	Portuguese
	Cocher ici si vous lisez ou parlez le français.	French
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	Polish
	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	Slovak
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	Xin ñaunh daáu vaøo oa naøy neáu quyù vò bieát ñioïc vaø nouì ñhòïc Vieät Ngöð.	Vietnamese
	당신이 한국어 말할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu
	באצייכנסט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	Yiddish
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	Greek
	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	Hungarian

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.

Door County and our transit provider 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.

Door County 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.

Door County's assessment of the programs, activities and services that are most critical include 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. In the case of **Door County**, the Department of Human Services acts as the WisDOT sub-recipient for public transit services. Many of these individuals first come to our attention when they apply for various forms of public assistance, public benefits, or emergency assistance through the Department of Human Services.

Factor 4 – Resources and Costs

Resources available and overall cost to provide LEP assistance.

Given the small size of LEP encounters and small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request. **Door County** will contact state and local units of government and community resources for assistance in translation services.

Even though **Door County** 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 **Door County's** programs and services. Language assistance can include interpretation and/or translation from one language into another language.

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

Door County strives to offer the following measures when encountering LEP Persons:

- ✓ Post Title VI, LEP, and ADA information on the **Door County** 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 **Door County** 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:
 - **Multicultural Center of Greater Green Bay**, 920-438-1660, <https://multiculturalcentergb/>
 - **Casa Hispana**, 920-257-5699, <https://www.casahispanawi.org>
 - **Hmong American Partnership Fox Valley**, 920-205-4020, <https://www.hapfv.org>
 - **Hispanic Resource Center of Door & Kewaunee Counties Inc.**, 920-559-1878
- ✓ 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 **Door County** on limited basis. Instead, **Door County** will seek assistance from fluent speakers.
- ✓ Prioritize the hiring of bilingual staff if possible.

Public Outreach – Informing LEP Persons of Language Assistance Services

Door County uses the following steps to inform LEP persons of the availability of language assistance services:

- ✓ Posts the Title VI/LEP *Notice of Nondiscrimination* on its website. The notice includes a sentence written in Spanish and Hmong providing instructions on how to contact **Door County** to request information in another language.
- ✓ When encountering LEP persons directly, **Door County** will use the “*I Speak*” *Language Identification Card* to identify the language and communication needs of LEP persons. **Door County** 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:
 - **Multicultural Center of Greater Green Bay**, 920-438-1660, <https://multiculturalcentergb/>
 - **Casa Hispana**, 920-257-5699, <https://www.casahispanawi.org>
 - **Hmong American Partnership Fox Valley**, 920-205-4020, <https://www.hapfv.org>
 - **Hispanic Resource Center of Door & Kewaunee Counties Inc.**, 920-559-1878
- ✓ 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

Door County will review the LEP Plan on an annual basis. Review and updates will include the following:

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

- ✓ Information on **Door County's** Title VI 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 Non-Discrimination and LEP complaints.

Demographic Representation Information⁴

A. Demographic Representation Table⁵

The table below depicts US Census county population data by race and **Door County's** non-elected committees/councils related to transit.



Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Door County Population 27,731	94.83%	2.64%	.53%	.47%	.80%	.73%
Administrative Committee (public) 7 members	100%	0%	0%	0%	0%	0%
Door – Tran Board (private) 12 members	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

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

As vacancies on non-elected boards, committees and councils become available, **Door County** will make efforts to encourage and promote diversity.

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

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

NA - This is an optional tool to gather information on the racial composition of Board members.

Date:

Dear Member,

Door County, 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 **Door County** 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 **Door County**, 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 **Door County** can use to gather information on the racial composition of its committee members for the purposes of meeting the Title VI plan requirements.

