

Title VI Program Update



GO Transit
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Approved by the City of Oshkosh Transit Advisory Board on June 16, 2021

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C. Active Lawsuits, Complaints or Inquiries Alleging Discrimination

There are no current complaints against GO Transit which allege discrimination on the grounds of race, color or national origin.

D. Discrimination Complaint Procedure

Each complaint which is received that alleges discrimination on the basis of race, color, or national origin will be investigated using the procedure below, whether it specifically references Title VI or not. The complainant will be notified within 7 days that their complaint has been received and is being investigated. This notice may include a request for additional information necessary to investigate the complaint (e.g. date or specific time of an incident). A written response of the determination will be provided to the complainant within 30 days whenever possible. If the investigation and determination cannot be completed within 30 days, the complainant will be provided with written notice including an explanation of the reason a longer time is required, and a deadline for a determination.

If the allegation concerns a specific incident involving a driver or information specialist, a preliminary investigation of the facts will be conducted by GO Transit's Supervisory Staff. It should be noted that the downtown transit center and all of GO Transit's buses and facilities are equipped with cameras. These cameras have proved to be extremely useful in resolving complaints about specific incidents. Supervisory Staff will make a preliminary determination about the facts, recommend any disciplinary measures, and transmit the complaint to the Transportation Director.

For more general allegations – e.g. regarding GO Transit service design or fares – the Transportation Director will determine the appropriate member of senior staff to conduct the preliminary investigation and report the findings and recommendations for corrective action to the Transportation Director.

The Transportation Director will review all complaints alleging discrimination on the basis of race, color, or national origin and the results of the preliminary investigation. The Transportation Director will make a determination as to whether the allegation of discrimination on the basis of race, color, or national origin was valid, and any corrective action that will be taken. Note that even if the allegation of discrimination is determined to be invalid, corrective action may still be warranted in some cases.

The Transportation Director will provide his or her findings in writing to the complainant, include whether the allegation of discrimination was found to be valid, and corrective actions that the GO Transit has taken or promises to take. The letter will inform the complainant of the opportunity to provide additional information that may lead GO Transit

to reconsider its conclusions and of the complainant's right to file a complaint with the Federal Transit Administration (FTA).

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
Title VI Complaint Form

TITLE VI MONITORING PROCEDURES

The following procedure will be followed in monitoring the level and quantity of transit service provided to minorities in the Oshkosh area in compliance with Title VI regulations. For monitoring purposes, minority areas will be defined at the census tract level since more disaggregate data is not available. All minority tracts will be monitored.

A. Levels of Service

To assess level of transit service to minority areas, headways, vehicle loads, vehicle assignment, service access, and distribution of amenities will be compared with service policies and standards for the entire system. The standards will be as defined in the most recent Transit Development Plan (TDP). All bus routes are comprehensively evaluated every 5 years as part of the TDP process. The level of service provided to minority areas is also analyzed during the TDP process. Census and service data is presented in the final TDP document. The final TDP document is available at GO Transit's office and on our regional planning commission's website. TDP documents are also available on GO Transit's website.

B. Quality of Service

Quality of service is currently monitored through public comments and passenger surveys designed to provide information about passenger demographics, trip purposes, and service ratings. For purposes of monitoring the quality of transit service in minority tracts, passenger surveys are analyzed by route in order to identify responses from these areas for comparison with responses from non-minority areas.

C. Corrective Action

Where inequities in service are identified or perceived by transit users in minority areas, a review of corrective action will be undertaken. Actions involving service level changes will be addressed through the existing decision-making structure. This structure includes public notification of and involvement through Transit Advisory Board meetings.

D. Monitoring Frequency

An assessment of service level, vehicle assignment, load factors, distribution of facilities, and service access in minority areas was done in the original Title VI Documentation for

the Oshkosh Area in 1978 and updated in subsequent submissions. Future monitoring reviews will be undertaken when major service changes occur, upon publication of new census information, and during the Transit Development Plan process.

PUBLIC PARTICIPATION PLAN

A. Process

The GO Transit's public participation process includes meaningful access during monthly board meetings, written materials (route maps & pamphlets), transit center information stations, GO Transit's website and social media (facebook & twitter).

The GO Transit's Transit Advisory Board (TAB) meets monthly, with all meetings open to the public. Time is provided for the public to comment on any issues at each meeting. Board meetings are held during the operating hours of GO Transit buses and paratransit vehicles to improve access for riders. Service and fare change notices are sent directly to persons and organizations that may be impacted (including service changes and fare increases). Persons and organizations can request notification of future meetings and there is no charge. An archive of Transit Advisory Board agendas and meeting minutes are posted on GO Transit's website.

Beyond monthly TAB meetings, several other methods are used to communicate with riders. The GO Transit Route Map/Rider Guide is a printed map with guidance for using GO Transit services and includes information on how to contact GO Transit, as well as the web address and social media. Each year, 20,000 route maps are printed and distributed throughout the community. Maps are available at several key destinations in the City, on all transit vehicles, at the main office, and are mailed at no cost to requestors. GO Transit also publishes brochures that describe specific programs and services. These materials are available to riders at GO Transit's main office, www.rideGOtransit.com, and are distributed to local agencies.

GO Transit's downtown transit center located at 110 Pearl Avenue provides another communication avenue with riders. The transit center contains 2 informational stations. Each station contains travel information, notices to the public, contact information, and other communications applicable to the service. The transit center is centrally located in the City and many routes pulse into the center for transfers between runs.

Each GO Transit bus contains an info display area. Maps, brochures, flyers and notices are placed on buses for display to riders.

GO Transit's website (www.rideGOtransit.com), Twitter and Facebook page also provide information to the public. The web content includes information on trip planning, paratransit programs, contact info, board meeting agendas and minutes, detours, news, and more. Public input is welcomed via the website and visitors are provided several

options for contacting GO Transit (fax, mail, email, or phone). The website is designed to be clear and easy to use.

Proposed fare and service changes are announced to the public by the means described above, and public input is solicited far enough in advance for GO Transit to consider the comments, and make revisions based on the comments. In soliciting public input, GO Transit provides opportunities for interaction.

Persons and organizations are afforded an opportunity to provide input in several ways:

- Email
- Telephone
- Fax
- In writing
- GO Transit phone App
- In person at public meetings located at City Hall or face-to-face meetings at GO Transit's main office

GO Transit's ongoing public participation outreach methods to engage minority and LEP populations include partnerships with community-based organizations, use of digital media and public participation techniques implemented during our transit development plan process.

GO Transit has a continuing partnerships with community-based organizations. We've provided travel training resources to World Relief, Lakeland Care District, the literacy council and Oshkosh Housing Authority. We have ongoing meetings and contact with these groups to invite participation and communicate transit issues. GO Transit participates in community events that help us to engage minority and LEP populations. We attend an annual Back to School Fair that is designed to help families and children prepare for the upcoming school year. We also attend other public events, like the State of the City Address, that are designed to promote public participation and information sharing.

GO Transit uses digital media as another avenue to engage participation. Our Facebook, Twitter and website pages all provide any member of the community the ability to contact us on their schedule. We post all information that is applicable to our riders (news, meetings notices, and planning events) to help notify all populations. We realize that not all community members have access to a computer. However, a 2020 rider survey showed that 75% of our riders have a smart phone and 83.8% of riders in Winnebago County, Wisconsin have access to the internet at home.

GO Transit's transit planning process (Transit Development Plan - TDP) contains its own Public Participation Plan. The PPP is developed by our MPO and identifies outreach efforts and public involvement opportunities. Techniques used to gain input from minority and LEP populations include involving stakeholders in the steering committee. This helps to disseminate information to populations that can be hard to reach. The MPO uses public notices in appropriate non-English languages and maintains contacts with local translators. To encourage participation, our rider surveys included a free ride or prize

drawing. TDP meetings are held at locations that are accessible and reasonably welcoming to all residents. Our 2017 TDP steering committee is made up of organizations and advocacy groups that represented a variety of community interests. The participant list included American Red Cross, Ability Resource Center (non-profit), Making the Ride Happen (non-profit), UW-Oshkosh, Oshkosh Common Council, WisDOT and Winnebago County. We also identified other stakeholder groups and conducted interviews to engage their participation. This list included the Oshkosh School District, Fox Valley Technical College, United Way, Oshkosh Area Community Foundation, Oshkosh Housing Authority, Unified Catholic Schools, Christine Ann Domestic Abuse Services, Boys and Girls Club and Lakeside Packaging Plus (sheltered workshop). Each stakeholder interview included the ability to discuss issues and increase engagement.

The TDP process occurs every 5 years. The results of the TDP drive GO Transit planning and policy decisions, so we place added effort to engage public participation during this critical process. GO Transit will continue to work with our MPO to develop and implement public engagement techniques for each planning process.

Below is a summary of outreach efforts made since the last Title VI submission:

- Facebook, Twitter and website maintenance of information, as well as including opportunities for input
- Start of new TDP and planning new customer survey
- Annual attendance at community events (Back to School Fair, State of the City Address, etc.). Riders and community members visit booth to have informal discussions, ask questions and provide feedback
- TDP plan process, included public participation plan with some efforts described above
- Monthly Transit Advisory Board meetings, noticed to the public
- Multiple group and individual travel trainings, where riders can provide feedback and ask questions

SERVICE STANDARDS AND POLICIES

GO Transit has developed the following service standards and policies:

- Vehicle Capacity
- Route Headways
- On-Time Performance
- Service Availability
- Vehicle Assignment Policy
- Transit Amenity Policy

A. Vehicle Capacity

The table below lists standard capacity by the types of vehicles in GO Transit's fleet

Vehicle Type	# in Fleet	Seated Capacity	Standing Capacity	Total Capacity	Wheelchair Capacity	Total Capacity w/ wheelchairs
40' New Flyer (XD40)	5	40	30	70	2	63
35' New Flyer (XD35)	7	32	25	57	2	50
40' New Flyer (DE40LF)	4	39	30	69	2	60

B. Route Headways

Vehicle headway is the length of time it takes between two buses traveling in the same direction on a particular route. GO Transit's fixed-routes are scheduled with 30 minute headways. There is one segment on route 9 that provides service every 60 minutes. The intercity service (route 10) operates with an approximate 90 minute headway. All headway is consistent for the entire service day and week. There is no service adjustment for peak and non-peak service.

Routes	Frequency for all Service
1, 2, 3, 4, 5, 6, 7, 8 & 9	30 Minutes
Route 9 service to YMCA	30 Minutes – Upon Request
10 (Intercity)	90 Minutes

C. On-Time Performance

One of the most important service standards for GO Transit is on-time performance or adherence to published schedules. Reliability is one of the main characteristics of the GO Transit brand.

A GO Transit bus is considered on-time if it departs a scheduled time point no more than 1 minute early or less than 5 minutes late. GO Transit's on-time performance goal is 90%.

D. Service Availability

GO Transit currently provides service to all major destinations and most large employment centers within the City of Oshkosh. The majority of the City of Oshkosh's

residents are within one quarter mile of bus service. GO Transit optimizes the funding and resources it receives to maximize its route coverage within the City of Oshkosh. Currently, over 85% of the dwelling units in the city are within ¼ mile of a bus stop. GO Transit frequently reviews its level of service and service coverage. Further opportunities to expand service coverage will be discussed when resources become available.

E. Vehicle Assignment Policy

Vehicles are rotated between routes daily and are not assigned to specific routes or areas of the City of Oshkosh. GO Transit frequently reviews the ridership of its routes and assigns the larger and smaller capacity buses to the areas whose ridership best matches these capacities.

F. Transit Amenity Policy

GO Transit has nearly 250 formal bus stops. GO Transit places bus stops every 2-3 blocks (approximately) and near major trip generators. There are also information displays placed at key locations along each route that provide stop times throughout the service day. GO Transit has a number of bus benches and shelters located throughout the service area. New shelters or bench installations are dependent on the ability to obtain the necessary right of way to locate the shelter, ridership activity and public requests. On private property, they are dependent upon a sponsoring business or other entity to provide maintenance and snow removal.

LANGUAGE ASSISTANCE PLAN

A. Background Information

Limited English Proficiency (LEP) persons are defined as persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Public transit is a key means of achieving mobility for many people with Limited English Proficiency (LEP). According to Winnebago County, Wisconsin 2019 Census Data, 2.2 percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work – compared with about 1.07 percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transportation at higher rates than native-born adults. Agencies that provide language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers.

Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways.

- 1) Agencies that reach out to recent immigrant populations in order to prepare a language implementation plan send a positive message to these persons that their business is valued; and
- 2) Community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations.

B. Legal Basis for Language Assistance Requirements

Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d), and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination. Executive Order 13166, "*Improving Access to Services for Persons with Limited English Proficiency*," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The U.S. Department of Transportation (USDOT) requires that recipients of USDOT funding take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). USDOT recommends that recipients use the USDOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

C. Evaluation - Four Factor Analysis

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. *The number or proportion of LEP persons eligible to be served or likely to encounter an agency program, activity, or service;*
2. *The frequency with which LEP individuals come in contact with an agency program, activity, or service;*
3. *The nature and importance of the program, activity, or service provided by an agency to people's lives; and*

4. *The resources available to an agency and the cost to provide LEP Assistance.*

A summary of the results of GO Transit’s four-factor analysis is as follows:

Factor #1: *The number or proportion of LEP persons eligible to be served or likely to encounter a GO Transit program, activity, or service.*

GO Transit examined the US Census data from 2019 and was able to determine that approximately 4,151 or 6.5% of people (age 5 and older) within the City of Oshkosh spoke a language other than English. Of the 4,151 people reporting they speak a language other than English, less than 2.3% of total respondents speak English less than “very well.”

LANGUAGE SPOKEN AT HOME (OSHKOSH, WI)		
Population 5 years and over	63,402	63,402
English only	59,251	93.50%
Language other than English	4151	6.5%
Speak English less than "very well"	1,445	2.30%
Spanish	1,326	2.10%
Speak English less than "very well"	390	0.60%
Other Indo-European languages	696	1.1%
Speak English less than "very well"	138	0.20%
Asian and Pacific Islander languages	1,737	2.70%
Speak English less than "very well"	778	1.20%
Other languages	392	0.60%
Speak English less than "very well"	139	0.20%

GO Transit surveyed transit riders in October of 2018. To provide assistance to riders while completing the survey, there were survey administrators on board every bus and at our downtown transit center. According to this rider survey results, 2% of respondents said that English was not their primary spoken language. 8% of these riders responded that they did not speak English at all. Riders will be surveyed again in late 2021.

Factor #2: *The frequency with which LEP individuals come in contact with a GO Transit program, activity, or service.*

GO Transit assesses the frequency with which LEP individuals come in contact with services by communicating with staff and drivers that have or could possibly have contact with LEP persons. This includes documenting phone inquiries and discussions with drivers. In the previous four years, GO Transit has had no requests for interpreters or for translated documents.

Each summer, drivers have contact with international students attending the University of Wisconsin Oshkosh. These students are supported by UWO staff and faculty until they can independently use GO Transit services. Our experience with this population

has shown that they tend to know enough English to communicate on the phone or with drivers.

Additionally, GO Transit attends regional and local transportation coordination meetings where unmet transportation needs and solutions are discussed by various stakeholders.

Beyond the communications and observations above, it is difficult to determine with certainty which LEP individuals require transit services and are also served by GO Transit programs. The map in Appendix 1 shows GO Transit bus routes and the location of the minority population in Oshkosh. GO Transit's next Transit Development Plan (TDP) process will include an in-depth LEP study according to service area. Information gathered during the next TDP process will be included as an update to this plan.

Factor #3: The nature and importance of the program, activity, or service provided by GO Transit to people's lives.

Most customer service requests received by GO Transit personnel are for schedules, route information and for the sale of tickets and passes. Most transit riders are regular users who use only a portion of the bus system for their daily travel, making routine trips with little need for complex information. Requests for information about routes and schedules are most likely to be made by infrequent or new passengers to the system. This population could include recent immigrants, including those that are transit dependent, in non-English speaking households. Therefore it is important to have language resources ready to enable service for these clients.

GO Transit's website, www.rideGOtransit.com, contains a language translator (Google Translate) where LEP passenger and potential riders can access basic information on routes and fares. Information about GO Transit and policies can be obtained and translated for LEP visitors through several agencies who translate on behalf of the Oshkosh community. These agencies include:

ADVOCAP – Oshkosh Office
920.426.0150
2929 Harrison Street
Oshkosh, WI 54901

University of Wisconsin Oshkosh
Office of International Education
920.424.0775
800 Algoma Blvd.
Oshkosh, WI 54901

Oshkosh Police Department
920.236.5700
420 Jackson Street
Oshkosh, WI 54903

World Relief Fox Valley – Oshkosh
Office
920.231.3600
404 N. Main St. Suite 302
Oshkosh, WI 54901

Oshkosh Area United Way
920.235.8560
36 Broad Street, Ste 100
Oshkosh, WI 54901

Factor #4: *The resources available to GO Transit and the cost to provide LEP Assistance.*

GO Transit is a small urban public transit operator receiving Federal funds for transit operation under Section 5307. It is a sub-recipient of the Governor's Apportionment from the Wisconsin Department of Transportation. Due to limited resources, GO Transit partners with local agencies, including those listed above, to address the needs of the LEP persons in our community. These agencies have been integral in helping students, refugees and other minority populations navigate the public transportation system that is currently provided by GO Transit. Because Oshkosh has a small population of LEP persons likely to use transit, the most cost-effective language assistance appears to be through the use of verbal and oral interpretation services. At this time, there have been no requests and it does not appear to be cost-effective to engage in translating and publishing route and schedule information into other languages.

D. Language Assistance Measures

GO Transit has or will implement the following LEP measures.

- Provide picture cards to drivers with basic information for Hmong riders;
- Work with the United Way & World Relief when refugees are located in our service area;
- Notify drivers and other staff to continue to immediately communicate experiences involving contact with LEP individuals that may require language assistance;
- Engage attendees at GO Transit public information meetings or hearings to ascertain the attendee's ability to understand English by having a staff member greet and briefly speak to each attendee;
- Include Google Translate feature on website
- All staff computers (including dispatch) will bookmark Google Translate;
- GO Transit will utilize Spanish and Hmong speaking interpreters provided by the Oshkosh Police Department and ADVOCAP as sources of assistance.
- Incorporate the community's language assistance resources into travel training program.

E. Monitoring and Updating GO Transit's LAP Plan

GO Transit will update the LAP plan as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the service area or when contact with LEP individuals becomes more frequent. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether GO Transit’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether GO Transit has fully complied with the goals of this LAP Plan.
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

Information gathered in the review will be used to update the LAP Plan, no less than every three years to coincide and by integrated with GO Transit’s submission of its Title VI Update to regulatory agencies.

NON-ELECTED BOARD

GO Transit is guided by a Transit Advisory Board. The Transit Advisory Board reviews fare changes, route revisions and polices. They provide a recommendation to the Common Council and advise GO Transit. Major route and fare changes are decided by the City of Oshkosh’s Common Council (elected officials).

Recent board openings were publicized on buses, website and on GO Transit’s facebook page. Board openings were also shared during local advocacy coalition and Transit Advisory Board meetings. The City of Oshkosh encourages all community members to apply for and serve on advisory boards and committees.

The table below shows the Transit Advisory Board’s membership by race.

Body	Caucasian	Latino	African American	Asian American	Native American
Transit Advisory Board	5	0	2	0	0

Attached is the board approval of this submission.

TITLE VI EQUITY ANALYSIS FOR CONSTRUCTION PROJECTS

GO Transit has no current plans for facility construction or any recent facility construction projects.