

**HURON TRANSIT CORPORATION
Title VI Plan**

Agency Name: HURON TRANSIT CORPORATION

Date Adopted: 6/01/2009

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

HURON TRANSIT CORPORATION (HTC) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

This plan was developed to guide *HTC* in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

**Title VI Coordinator
Huron Transit Corporation
1513 Bad Axe Rd
Bad Axe MI, 48413**

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in the *HTC* facility and on their revenue vehicles. Title VI coordinator contact information is available on the *HTC* website, at TATBUS.COM. Additional information relating to nondiscrimination obligation can be obtained from the *HTC* Title VI Coordinator.

Title VI information shall be disseminated to *HTC* employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of

the *HTC*'s policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the *HTC*'s expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from *HTC* where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of *HTC* Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

II. Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)

III. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

Iç. Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with *HTC* at the following address:

*Huron Transit Corporation
1513 Bad Axe Rd.
Bad Axe, MI 48413*

NOTE: *HTC* encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by *HTC* will be directly addressed by *HTC*. *HTC* shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, *HTC* shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

HTC will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from *HTC*, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by HTC, a written response will be drafted subject to review by the transit's attorney. If appropriate, HTC's attorney may administratively close the complaint. In this case, HTC will notify the complainant of the action as soon as possible.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

VI. Limited English Proficiency (LEP) Plan

Huron Transit Corporation had conducted a four factor analysis to determine if a formal Limited English Proficiency Plan (LEP) was required. Based on the results of that analysis, HTC determined that a formal LEP Plan was not necessary, due to the small number of LEP individuals and infrequent contact with HTC. However, HTC provides access to its service for LEP individuals through the following measures:

*Drivers and office staff have access and are trained in the language cards. The drivers have them in their clipboards.

*The dispatch/office computers have a desk top icon for Babelfish, and the staff has been trained to use it.

VII. Community Outreach

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

Board Meetings. The Board of Directors holds monthly meetings and the public is invited to attend. Huron Transit has a very active Local Advisory Committee. The Transit works with the Huron County Collaborative Body to listen and respond to the needs. Customer Complaint Process. Citizens may call our office at 989.269.2121 to lodge a complaint or comment. All complaints/comments are distributed to the relevant manager.

We submit to the Michigan Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

Appendix A Employee Annual Education Form

Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the *HTC* are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to *Title VI Coordinator*.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin. □

Appendix B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the *HTC* Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

Your signature

Print your name

Date



Appendix C

TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and sent it to:

Provide address here

Please print clearly:

Name:

Address:

City, State, Zip Code:

Telephone Number: _____(home) _____(cell) _____(message)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

_____ race or color

_____ national origin

_____ income

_____ other

What was the date of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe the circumstances as you saw it: _____

Please list any and all witnesses' names and phone numbers:

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

Title VI Coordinator
HURON TRANSIT CORPORATION
1513 Bad Axe Rd.
Bad Axe, MI 48413

Your signature

Print your name

Date

APPENDIX D Letter Acknowledging Receipt of Complaint

Today's Date

Name

Address

Town, State, Zip Code

Dear _____ :

This letter is to acknowledge receipt of your complaint against the *HTC* alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 989.269.2121, or write to me at this address.

Sincerely,

Title VI Coordinator
Huron Transit Corporation
1513 Bad Axe Rd.
Bad Axe, MI 48413 ☐

APPENDIX E Letter Notifying Complainant that the Complaint Is

Today's Date

Name

Address

Town, State Zip Code

The matter referenced in your letter of _____ (date) against HTC alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Title VI Coordinator
Huron Transit Corporation
1513 Bad Axe Rd.
Bad Axe, MI 48413 ☐

APPENDIX F Letter Notifying Complainant that the Complaint Is

Today's Date

Name

Address

Town, State Zip Code

Dear :

The matter referenced in your complaint of _____ (date) against the HTC alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The *HTC* has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from *HTC*, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Title VI Coordinator
Huron Transit Corporation
1513 Bad Axe Rd.
Bad Axe, MI 48413 □

APPENDIX G Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

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HTC is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. **If you feel you are being denied participation in or being denied benefits of the transit services provided by HTC, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Huron Transit Corporation
1513 Bad Axe Rd
Bad Axe, MI 48413
(517) 269-2103

For more information, visit our website at TATBUS.COM