

## HURON TRANSIT CORPORATION

### TITLE VI

#### Huron Transit Corporation's Title VI Policy and Complaint Process

Huron Transit Corporation (HTC) grants all citizens equal access to all its transportation services. It is further the intent of HTC that all citizens be aware of their rights to such access. This process is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of HTC programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

#### What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that "No persons 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 subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color or national origin. Other Civil Rights laws protect gender discrimination.

#### HTC's Complaint and Investigation Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by HTC.

These procedures do not deny the right to the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the HTC may be utilized for resolution. Any individual, group of individuals or entity that believes that they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discrimination must accompany all complaints.
2. HTC strongly encourages the use of the complaint form in this web site when filing discrimination complaints with HTC.
3. The preferred method is to file your complaint in writing using the HTC form and sending it to:  
Title VI Coordinator  
Huron Transit Corporation  
1513 Bad Axe Rd.  
Bad Axe, MI 48413

In the case where a complaint is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the HTC Title VI Coordinator. Under these circumstances, the complaint will be interviewed, and the

Title VI Coordinator will assist the Complainant in converting the verbal allegations to writings.

When a complaint is received, the Title VI Coordinator will provide a written acknowledgement to the Complainant within ten (10) days by registered mail.

If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) business days to submit the required information. Failure to do so may be considered good cause for determination of no investigative merit.

Within 15 business days from receipt of a complete complaint, the HTC will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Director or his/her authorized designee will notify the Complainant by registered mail, informing them of the disposition.

- a. If the decision is not to investigate, the notification shall specifically state reason for the decision.
- b. If the complaint is to be investigated, the notification shall state the grounds of HTC's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assigning an investigator.

When the HTC does not have sufficient jurisdiction, the Director or his/her authorized designee will refer the complaint to the appropriate State and Federal agency holding such jurisdiction.

If the complaint has investigated merit, the Director or his/her authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Director within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate authorities, and an extension will be requested.

The Director or his/her authorized designee will issue letters of finding to the Complainant within 90 days from receipt of the complaint, he/she has the right to file a complain with the:

U.S. Dept. of Transportation  
Federal Transit Administration  
200 West Adam Street  
Suite 320  
Chicago, IL 60606-5253