

**HURON TRANSIT CORPORATION
Title VI Program**

Agency Name: HURON TRANSIT CORPORATION

Date Adopted: 8-9-17

I. Program 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 4702.1B.

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
Phone: (800) 322-1125
Fax: (989) 269-8631

II. Title VI Information Dissemination

Title VI information posters (see Appendix G) shall be prominently and publicly displayed in the HTC facility and on HTC revenue vehicles. The name of the Title VI Coordinator is available on the HTC website, at www.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 Program 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.

Subcontractors and vendors are monitored for compliance through observation and the active monitoring of complaints.

IV. Membership of non-elected committees and councils

HTC has two non-elected committees and councils: Huron Transit Board of Directors and the Local Advisory committee (LAC).The Huron Transit Board of Directors meets on a monthly basis to discuss policies and the operations of HTC. The Huron County Commissioners select the Board of Directors. The LAC acts as the voice of the people for Huron County meeting quarterly. Individuals interested in joining the LAC are encouraged to submit a request to the Huron Transit Board of Directors. In order to encourage minority participation, future LAC vacancies will be posted at the transit facility and the Board of Directors and remaining LAC members will actively advertise vacancies in the community. The table below shows the race of members currently serving on HTC board and LAC.

Body	Caucasian
Population	97.6%
Board of Directors	100%
Local Advisory Committee	100%

V. Determination of Site or Location of Facilities

HTC has no current or anticipated plans to develop new transit facilities. If in the future HTC decides to develop new facilities HTC is required to do the following:

Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, (The Public Participation Plan), the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin. Facilities included are but are not limited to, storage facilities, maintenance facilities, and operations centers. For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by sit+ing of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

VI. 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 Program, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

There have been no Title VI investigations, complaints, and lawsuits filed with the recipient since the time of the last submission of the Title VI plan. If any investigations, complaints, or lawsuits are received information will be tracked in the table below:

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

VII. Title VI Complaint Procedures

How to file a Title VI Complaint?

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:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- 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
Attention: Title VI Coordinator
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.

What happens to the complaint after it is submitted?

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.

How will the complainant be notified of the outcome 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.

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

VIII. Limited English Proficiency (LEP) Plan

Huron Transit Corporation Plan Summary

HTC has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to HTC services as required by Executive Order 13166. A limited English proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the HTC's extent of obligation to provide LEP services, the HTC undertook a U.S. Department of Transportation Four Factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the HTC service area who may be served or likely to encounter an HTC program, activity, or service
- 2) The frequency with which LEP individuals come in contact with an HTC services
- 3) The nature and importance of the program, activity or service provided by the HTC to the LEP population
- 4) The resources available to the HTC and overall costs to provide LEP assistance.

A brief description of these considerations is provided in the following section.

Four Factor Analysis

1. The number or proportion of LEP persons eligible in the HTC service area who may be served or likely to encounter an HTC program, activity, or service

HTC examined the U.S. Census report from 2010. In Huron County the population was 32,290 persons with 14,348 households, and 9,328 families residing in the county. The racial makeup of the county was 97.5% White, .6% Asian,.4% American Indian, .4% Black or African American, .19% from other races, and 1.8% from two or more races. 2.1% of the population were Hispanic or Latino of any race. 45.48% were German, 20.50 % Polish, 11.01 % Irish, 8.85% English, 6.32% French, and 5.39% American ancestry according to the 2010 Census. 96.54% spoke English, 1.97% spoke Indo-European languages, and 1.12% spoke Spanish at home. .95% of residents reported that they speak English less than very well.

2. The frequency with which LEP individuals come in contact with an HTC program, activity, or service

The HTC assesses the frequency at which staff have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. As stated above Huron County Census data reported less than 1% of the population have difficulty speaking English. Since June 2003, the HTC has had zero (0) requests for interpreters or requests for translated HTC documents. Feedback has confirmed that HTC drivers and dispatch have had very little to no contact with limited English speaking individuals.

3. The nature and importance of the program, activity or service provided by the HTC to the LEP population

Demand-response services provided by HTC are important to persons living in the service area, including the limited LEP community by providing important mobility and independence to persons who cannot drive and/or cannot afford a personal automobile. There is no large geographic concentration of any one type of LEP

individuals in the HTC service area. Therefore, there is a lack of any social, service, professional, and leadership organizations within the HTC service area that focuses on outreach or membership of LEP individuals.

4. The resources available to the HTC and overall costs to provide LEP assistance.

HTC assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on an as needed basis, which documents would be the most valuable to be translated if and when LEP populations support the need, taking an inventory of available organizations that the HTC could partner with for outreach and translation efforts, and what level of staff training is needed. After analyzing the four factors, the HTC developed the Language Participation Plan outlined in the following section for assisting persons of limited English proficiency.

IX. Community Outreach

From the Four Factor Analysis it was confirmed that less than 1% of Huron County residents have limited English proficiency.

Public Participation Plan

As an agency receiving federal financial assistance, the HTC reaches out to the LEP population through Board of Director meetings that the public is invited to attend, support of an active Local Advisory Committee, participation with the Huron Collaborative Body, a responsive customer complaint process, and issuance of a public notice with a 30-day public comment period as part of the Michigan Department of Transportation (MDOT) annual application process. In accordance with the Public Participation Plan, HTC has made the following outreach efforts since the last Title VI Program submission:

- Conducted monthly Board of Directors meetings. Notices are posted in the lobby of the HTC to encourage public attendance
- Communicated with the Local Advisory Committee as necessary to keep the apprised of operations
- Attended any scheduled meetings of the Huron Collaborative Body
- Actively managed customer complaints by directing them to the appropriate manager for prompt follow up
- Completed the MDOT annual application process including the public notice and 30-day public comment period.

Language Participation Plan

HTC will provide assistance as needed to residents of Huron County. Employees of HTC will acquire the resources to assist those with a language barrier depending on the situation. All HTC drivers carry language cards in their clipboards as an aid in assisting if a rider isn't proficient in English.

HTC will update this plan per program requirements or based on driver/rider feedback and train staff upon hire and the adoption of any new system.

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 as protected by Title VI of the Civil Rights Act of 1964 and Federal Transit Administration (FTA) Circular 4701.1B.

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 Program

I hereby acknowledge the receipt of the HTC Title VI Program. I have read the Program 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.B.

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:

HURON TRANSIT CORPORATION, 1513 BAD AXE RD., BAD AXE, MI 48413

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

Dear Name:

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 the address below.

Sincerely,

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

APPENDIX E Letter Notifying Complainant that the Complaint is Substantiated

Today's Date

Name

Address

City, State, Zip code

Dear Name:

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 Not Substantiated

Today's Date

Name
Address
City, State, Zip code

Dear Name:

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 contact 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

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).

The 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 4702.1B. **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, Phone: (800) 322-1125.**

For more information, visit our website at www.tatbus.com.