

CCTA

Crawford County Transportation Authority
4276 W. North Down River Road Grayling, Michigan 49738
(989) 348-8215 email: ccta@frontier.com

Title VI Program

December 15, 2014

This Title VI Program was approved by a Board of Directors resolution on December 15, 2014.

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).

Crawford County Transportation Authority (CCTA) 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.B.

CCTA’s Title VI program is developed in accordance with this updated circular.

This program was developed to guide Crawford County Transportation Authority in its administration and management of Title VI related activities.

Title VI Coordinator Contact information: Julee Dean, Executive Director
P.O. Box 307
4276 W. North Down River Road
Grayling, MI. 49738
(989) 348-8215

II. Title VI Notice to the Public

Title VI information posters and brochures shall be prominently and publicly displayed in CCTA’s facility and on their revenue vehicles (Appendix A). Additional information relating to non-discrimination obligation can be obtained from CCTA’s Title VI

Coordinator.

Title VI information shall be disseminated to CCTA's employees annually via the Employee Education form in payroll envelopes (Appendix B). This form reminds employees of CCTA'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 CCTA'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 Acknowledgment of Receipt (Appendix C).

III. Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgments of receipt from the employees indicating the receipt of the CCTA's Title VI Program, copies of the Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

IV. Title VI Complaint Procedures and Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by the Crawford County Transportation Authority (hereinafter referred to as CCTA) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (Appendix D). The Crawford County Transportation Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office (Appendix E).

The Authority has 30 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 30 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 30 business days, the Authority 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, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). (Refer to Appendices F & G) A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An 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, she/he has 15 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.

V. List of transit-related Title VI investigations, complaints and lawsuits

As of the adoption date of this Title VI Plan, there have been no investigations, complaints or lawsuits against Crawford County Transportation Authority.

VI. Public Participation Plan

CCTA will make every possible effort feasible to involve minority and LEP populations in public participation activities. This Public Participation Plan will be reviewed periodically to ensure all pertinent state and federal guidelines are included.

- * Will schedule meetings at times and locations that are convenient and accessible for minority and LEP populations.
- * Does advertise the weekly schedule in the local newspaper. CCTA will consider

using radio as another way to reach the minority and LEP populations.

* Will, when feasible, electronically send and/or mail meeting announcements to groups likely to be interested in upcoming transportation meetings.

* Staff will be available to provide general information at our administrative location during normal business hours.

VII. Four Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the programs or recipient:

Crawford County	Total County Population	Speak Language other than English at home	Speak English less than "very well"	Speak English only.
Total Amount	13,513	218	52	13,295
Percentage		1.6%	0.4%	98.4%

*US Census Bureau 2007-2011 ACS

2. The frequency with which LEP persons come into contact with the program:

CCTA management surveyed drivers and dispatchers and concluded that we currently have no individuals who use our system with limited english proficiency. It is concluded that CCTA cannot rule out *never* having a passenger with LEP, but the frequency at which these individuals come in to contact with our system is very limited.

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

Public transportation in Crawford County is an invaluable asset to those individuals who rely on our system to go about their business on a daily basis. Serving the transportation needs of senior citizens and persons with disabilities (including LEP individuals) along those of the general public is a service that our community believes in. From getting to work, going to a doctor's appointment, attending an after school function or sporting event, CCTA is committed to providing its' riders with the best service and experience possible.

4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach:

There are many valuable resources to help individuals who need assistance and are limited in the English language. Many of these resources are offered free of charge, and are readily available within our community.

- a. CCTA has ispeak cards available if needed;
- b. CCTA has an employee fluent in Spanish;
- c. Kirtland Community College has individuals fluent in other languages;
- d. Local Human Service agencies have individuals available if language translation if needed;
- e. Babelfish is a free online translator available if a computer is accessible and,
- f. Translate Voice is a free app from Apple that will translate from one language to another

VIII. Language Assistance Plan (LAP)

CCTA will take reasonable steps to ensure that any passenger identified as needing language assistance will receive that assistance and have equal opportunity to use CCTA’s services. I speak cards will be made available to those people and are also part of CCTA’s Limited English Proficiency Plan. CCTA currently has one employee qualified to speak the Spanish language, which is the largest group of non-caucasian individuals in Crawford County (239).

IX. Community Outreach and Membership of non-elected committees and councils

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

1. Board Meetings. The CCTA Board of Directors holds a monthly meeting on the third Monday of each month at 10:30 a.m. at the CCTA administrative office. These are open meetings and the public is invited to attend.
2. Local Advisory Committee meetings. CCTA holds an annual meeting of Local Advisory Committee members. The members of this committee are made up of a diverse selection of community members combining in an effort to ensure that CCTA is serving our population in the best manner possible. These are open meetings and the public is invited to attend.
3. Annual Application for funding. 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.

Body	Caucasian	Latino	African Am.	Asian Am.	Native Am.
Population	97.1%	1.7%	0.6%	0.4%	0.6%

CCTA Board	100%	0%	0%	0%	0%
Local Advisory Council	100%	0%	0%	0%	0%

Crawford County Transportation Authority’s service area has no concentration of minority individuals in the County. CCTA is committed to ensuring that no person is excluded from participation in membership in the Local Advisory Council based on race, color or national origin, as protected by Title VI Federal Transit Administration (FTA) Circular 4702.1B.

Members are selected by the affiliated organizations based on their clients who are major users of CCTA’s transportation services. All affiliate organizations of the Local Advisory Council are Title VI compliant. CCTA encourages minority participation from them. With such a small minority percentage of both population and ridership, the makeup of the council is in line with the census data. All announcements for meetings and funding requests are public notice and published county wide.

X. Limited English Proficiency (LEP Plan)

CCTA has developed a Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking access to CCTA 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 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.

XI. Subcontractors and Vendors

All subcontractors and vendors who receive payments from CCTA where funding originated 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.

In accordance with 49 CFR 21.9 (b), CCTA will ensure that all sub-recipients and vendors are complying with the DOT Title VI regulations.

XII. Title VI equity analysis

Currently, CCTA has no plans to construct a new administrative facility, vehicle storage facility, maintenance facility or operations center. If, in the future, CCTA plans to construct any of the above facilities, CCTA will comply with all Title VI equity analysis regulations.

Appendix A

* Crawford County Transportation Authority operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Crawford County Transportation Authority.

* For more information on the Crawford County Transportation Authority's civil rights program, and the procedures to file a complaint, contact (989)348-8215; email ccta@frontier.com; or visit our administrative office at 4276 W. North Down River Road, Grayling, Michigan 49738.

* A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

* If any information is needed in another language, contact (989) 348-8215.

Appendix B

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 Crawford County Transportation Authority 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 Julee Dean, 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 C

Acknowledgment of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Crawford County Transportation Authority's 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 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.

Signature

Print your name

Date

Appendix D – Title VI Complaint Form

Section

—
Name:

Address:
—

Telephone (Home): _____ Telephone
(Work): _____

Email

Address:

Accessible Format Requirements? Large Print _____ TDD _____ Audio
Tape _____ Other _____

Section

II:

Are you filing this complaint on your own behalf? Yes _____ No _____

*If you answered “yes” to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes _____

No _____

Section

III: _____

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of alleged discrimination: (Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all people who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section

IV: _____

Have you previously filed a Title VI complaint with this agency?

Yes _____ No _____

The

Section

Have you filed this complaint with any other Federal, State, or local agency, or with any al or State Court?

Yes No

You, If yes, check all that apply: [] Federal
by: _____ [] Federal
_____ [] State
_____ [] State
by: _____ [] Local
by: _____

Please provide information about a contact person at the agency/court where the
complaint was filed:

by: _____

Address: _____

Phone: _____

Section

Name of agency complaint is against:

Contact Person:

Title:
Telephone Number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature Date

Please submit this form in person or mail to the address below:

Crawford County Transportation Authority
Julee K. Dean, Title VI Coordinator
P.O. Box 307
4276 W. North Down River Rd.
Grayling, MI. 49738

Appendix E

Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Grayling, MI. 49738

Dear Ms. Doe:

This is to acknowledge receipt of your complaint against the Crawford County Transportation Authority 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 my office by calling

989-348-8215, or write to me at: P.O. Box 307, Grayling, MI. 49738.

Sincerely,

Julee K. Dean
Title VI Coordinator

Appendix F

Letter Notifying Complainant that the Complaint is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.

Grayling, MI. 49738

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the Crawford County Transportation Authority 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 will be included)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Julee K. Dean
Title VI Coordinator

Appendix G

Letter Notifying Complainant that the Complaint is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Grayling, MI. 49738

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the Crawford County Transportation Authority 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.

Crawford County Transportation Authority has analyzed the materials and facts pertaining to your case for evidence of the agency'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 Crawford County Transportation Authority, 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,

Julee K. Dean, Title VI Coordinator

