

SANILAC TRANSPORTATION CORPORATION

Title VI Program

Updated May 2017

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).

Sanilac Transportation Corporation 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, the updated circular, Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This program was developed to guide the Sanilac Transportation Corporation in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Current Transportation Director
Sanilac Transportation Corporation
Jack D. Campbell Transportation Center
110 Campbell Rd.
Sandusky, Michigan 48471
Phone: 810-648-9766
Fax: 810-648-9769
Email: santran9311@sbcglobal.net

II. Title VI Information Dissemination

Title VI information posters (see Appendix G) shall be prominently and publicly displayed in the *Jack D. Campbell Transportation Center* and on revenue vehicles. The name of the Title VI coordinator is available on the Sanilac Transportation Corporation website, at SanilacTransportation.com. Additional information relating to nondiscrimination obligation can be obtained from the Sanilac Transportation Corporation Title VI Coordinator.

Title VI information shall be disseminated to Sanilac Transportation Corporation employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the Sanilac Transportation Corporation 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 Sanilac Transportation Corporation'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. Membership of non-elected committees and councils.

STC has two non-elected committees and councils: Sanilac Transportation Board of Directors and the Local Advisory committee (LAC). The Sanilac Transportation Board of Directors meets on a monthly basis to discuss policies and the operations of STC. The Sanilac County Board of Commissioners select the STC Board of Directors. The LAC acts as the voice of the people for Sanilac County meeting annually. The Sanilac County Board of Commissioners advertises for applications to the LAC, and Sanilac Transportation encourages customers to apply. The table below shows the race of members currently serving on STC board and LAC.

Title VI Response Summary of Ethnicity of the	5 Member Board of Directors	5 Member Advisory Committee
Total Members	5	5
American Indian or Alaskan Native	See Other	
Asian	0	0
African or Black American	0	0
Native Hawaiian or Other Pacific Islander	0	0
White	5	5
Other – White & 1/8 American Indian	0	0

IV. Determination of Site or Location of Facilities

The Sanilac Transportation Corporation has no current or anticipated plans to develop new transit facilities. If in the future Sanilac Transportation Corporation decides to develop new facilities Sanilac Transportation Corporation is required to 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 siting 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.

V. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Sanilac Transportation Corporation 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 will be monitored for compliance through observation and the investigation of complaints.

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 Sanilac Transportation Corporation 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.

Sanilac Transportation Corporation has not received any public transportation related Title VI investigations, complaints, or lawsuit filed since the time of the last submission of the Title VI program. If any are received, they will be tracked and reported 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.				

V. 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 Sanilac Transportation Corporation at the following address:

*Title VI Coordinator/Current Transportation Director
Sanilac Transportation Corporation
110 Campbell Rd.
Sandusky, Michigan 48471*

NOTE: Sanilac Transportation Corporation 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 Sanilac Transportation Corporation will be directly addressed by Sanilac Transportation Corporation. The Sanilac Transportation Corporation shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Sanilac Transportation Corporation 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?

Sanilac Transportation Corporation 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 *Sanilac Transportation Corporation*, 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

VII. Limited English Proficiency (LEP) Plan

The Sanilac Transportation has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to STC 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.

VIII. Community Outreach

Public Participation Plan

As an agency receiving federal financial assistance, *Sanilac Transportation Corporation* engages minority and LEP populations in planning and decision making processes through marketing and outreach activities, monthly Board of Director meetings, participation in the Coordinated Public Transit-Human Services Transportation Plan, a responsive 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, *Sanilac Transportation Corporation* has made the following outreach efforts since the last Title VI Program submission:

- Various marketing and outreach activities
- Monthly Board of Director meetings
- Active management customer complaints by the transportation director

- Completion of the MDOT annual application process including the public notice and 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 Sanilac Transportation Corporation 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, employees are to 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 *Sanilac Transportation Corporation'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 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 send it to:

Title VI Coordinator/Current Transportation Director, Sanilac Transportation Corporation, 110 Campbell Rd., Sandusky, Michigan 48471

Please print clearly:

Name:

Address:

City, State, Zip Code:

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

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:

*Current Transportation Director
Sanilac Transportation Corporation
110 Campbell Rd.
Sandusky, Michigan 48471*

Your signature

Print your name

Date

APPENDIX D Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Sanilac Transportation Corporation 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 (810) 648-9766 or write to me at the address below.

Sincerely,

Name
Title VI Coordinator/Current Transportation Director
Sanilac Transportation Corporation
110 Campbell Road
Sandusky, MI 48471

APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of _____ (date), against the Sanilac Transportation Corporation, 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,

Name
Title VI Coordinator/Current Transportation Director
Sanilac Transportation Corporation
110 Campbell Road
Sandusky, MI 48471

APPENDIX F Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date), against the Sanilac Transportation Corporation, 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 Sanilac Transportation Corporation has analyzed the materials and facts pertaining to your case for evidence of the company'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 Sanilac Transportation Corporation, 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,

Name
Title VI Coordinator/Current Transportation Director
Sanilac Transportation Corporation
110 Campbell Road
Sandusky, MI 48471

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).

Sanilac Transportation Corporation 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. **If you feel you are being denied participation in or being denied benefits of the transit services provided by Sanilac Transportation Corporation, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at Jack D. Campbell Transportation Center, 110 Campbell Rd., Sandusky, Michigan 48471.**

For more information, visit our website at Sanilactransportation.com.