

# Straits Regional Ride Title VI Plan

**Agency Name: Straits Regional Ride**

**Date Adopted: 8-11-2020**

**Last updated: 11-12-2019**

## **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) in accordance with FTA C 4702.1B.

*Straits Regional Ride* 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.

This plan was developed to guide Straits Regional Ride in its administration and management of Title VI-related activities as well as the requirement to prepare and submit a written Title VI program to the State of Michigan for their approval.

### **Title VI Coordinator Contact information**

*Transportation Manager*

*521 Stempky Street*

*Cheboygan MI. 49721*

*1-866-731-1204*

[www.cheboygancounty.net](http://www.cheboygancounty.net)

## **II. Title VI Information Dissemination**

Title VI information shall be prominently and publicly displayed in Straits Regional Ride facility and on their revenue vehicles as well as on the County web site of Cheboygan County and in SRR Brochures. (Appendix G) The name of the Title VI coordinator is available on County of Cheboygan website, at [www.cheboygancounty.net](http://www.cheboygancounty.net)

Additional information relating to nondiscrimination obligation can be obtained from the Straits Regional Ride Title VI Coordinator., including a listing of all Title VI investigations, complaints or Lawsuits filed against the Transit agency.

Title VI information shall be disseminated to Straits Regional Ride employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of Straits Regional Ride 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 Straits Regional Rides expectations to perform their duties (see Appendix A).

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 Straits Regional Ride 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 Straits Regional Ride 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**

#### **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 form Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with Straits Regional Ride at the following address:

*Straits Regional Ride  
521 Stempky Street  
Cheboygan MI 49721*

NOTE: Straits Regional Ride encourages all complainants to certify all mail that is sent through the U.S. Postal Service to: Straits Regional Ride at 521 Stempky Street, Cheboygan, MI 49721. This will 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 Straits Regional Ride will be directly addressed by Straits Regional Ride. Straits Regional Ride shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Straits Regional Ride shall make every effort to address all complaints in an expeditious and thorough manner.

A letter 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?**

Straits Regional Ride 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 Straits Regional Ride, 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 Straits Regional Ride, a written response will be drafted subject to review by the transit's attorney. If appropriate, Straits Regional Rides attorney may administratively close the complaint. In this case, Straits Regional Ride 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. Four Factor Analysis:**

**1. Determine the number of LEP persons eligible to be served or likely to be encountered by Straits Regional Ride providing public transportation.**

2010 Census Cheboygan County :

Total population 25,485 of that population 133 are African American, 778 are Native American, 74 are Asian, 8 are Pacific Islander and 33 are of other decent and 24,459 are White.

**Total LEP to be served 1026**

Straits Regional Ride has never had a LEP person call dispatch or approach a driver for service to date.

**A. How LEP persons could interact with Straits Regional Ride**

Interaction may occur by direct communication with the bus driver, telephone correspondence with dispatch during operating hours, or at open meetings through a Local Advisory Committee or County Board meeting.

**B. Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group:**

Information obtained through the Census has helped Straits Regional Ride to determine that we have no large groups in Cheboygan County of LEP individuals. We have approximately 1026 potential individuals of six different ethnicities that could be affected spread throughout the entire County. This makes identifying the literacy skills of this very small population almost impossible to determine without knowing who these individuals are. It is Straits Regional Rides belief that this group of people is not dependent on public transportation or may not be able to speak English well enough to make it a barrier.

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

We have not encountered any individual calling dispatch, approach a driver, attend meetings, or come into the office to buy punch cards for transportation who did not speak English well enough to understand what they needed.

**3. The nature and importance of the program, activity, or service provided by Straits Regional Ride public transportation to people's lives.**

The service which Straits Regional Ride provides is very important to low income, disabled, non-driving public and seniors as well as many LEP individuals. This is also important for people who may not want to purchase a vehicle to get to all the places they need to go, especially in absence of family to help out. At many times we are their only source of transportation which makes this service a vital part of our community. In the event we have a LEP request we will continue to use the tools set forth in this program to make sure we do all we can to comply with the requirements set forward.

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

Straits Regional Ride has no available resources budgeted that can be used for providing LEP assistance. LEP assistance that should be provided includes having a professional interpreter and translation service available. We could determine what documents would be the most valuable to be translated if and when the population supports, taking an inventory of available organizations that Straits could partner with for outreach and translation efforts, and what level of staff training is needed.

## **Policy:**

Straits Regional Ride is committed to assisting people with LEP close the gap of language barriers to access public transportation. As LEP languages are determined for potential passengers, an oral resource will be arranged through Google Translate as available on an ongoing basis.

## **VII. Language Assistance Plan (LAP)**

- Ongoing assistance will be provided by dispatcher through Google translate upon request if and when the need arises.
- I speak cards will be available in the dispatch and carried by all drivers on all buses at all times.
- Coordinate with Emmet County Friendship Center, Cheboygan Council on Aging and Thunder Bay Transportation Authority on language resources.
- The LAP will be monitored through dispatch and drivers receiving requests; if and when the need arises additional resources will be sought out and implemented.

## **VIII. Community Outreach**

As an agency receiving federal financial assistance we have made the following community outreach since the last Title VI submission. We have coordinated with minority and or LEP populations through the following:

*Board Meetings. The Board of Directors holds monthly meetings and the public is invited to attend.*

*Public Meetings. When new service is proposed information is disseminated to the neighborhoods affected and public meetings are scheduled. In the past three years, the agency has been actively working with the FEET group in Emmet County as well as the Commissioners of Emmet County to expand services or start their own transportation system. This would enable them to serve more low income and disabled people as well as public riders in their county.*

*Travel Training Class. Straits Regional Ride has developed a travel training program to reach out to community groups (senior centers, senior facilities, and the disabled community) to conduct travel training classes. Travel Training classes are ongoing as well as outreach to these populations.*

*Customer Complaint Process. Citizens may call our Dispatch at 1-866-731-1204- to lodge a complaint or comment. All complaints/comments are then distributed to the relevant manager who researches the complaint and responds to the citizen. Straits Regional Ride complaint process was updated in 2013-2014.*

*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.*

## **IX. Title VI Equity Analysis**

In the event that Straits Regional Ride builds an office facility or maintenance facility we will follow NEPA process as indicated in FTA C 4702.1B in the planning of such facility. The location will be selected without regard to race, color, or national origin. Further if a facility is built, census tracts will

be used to determine no negative impact is made on potential Title VI individuals. If it is determined that an impact may occur there needs to be legitimate justification for the location with no alternate site available to meet the needs of the transit system. Before the planning process is completed Straits Regional Ride must consider alternatives to determine any site that would lessen the potential impact. At that point we must follow the least discriminatory alternative.

**X. Membership of Non-Elected Committees:**

During the process of attracting new LAC members Straits Regional Ride and CCOA will post notices for the LAC committee at the CCOA stating that we are looking for members and we do not discriminate based on race, color, or national origin. The senior center is one of the places in the County of Cheboygan that has a diverse ethnic population in attendance on a daily basis. See Appendix H for the breakdown of non-elected committees.

**XI. Transit related Title VI investigations, complaints and lawsuits.**

Straits Regional Ride has had no Title VI complaints investigations or lawsuits since the inception of the Transit system or prior to having a written Title VI program.

## **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 Straits Regional Ride 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 the Title VI Coordinator.

For 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 Straits Regional Ride 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.

\_\_\_\_\_  
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:

Straits Regional Ride  
521 Stempky Street  
Cheboygan MI 49721

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: \_\_\_\_\_

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

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

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

Straits Regional Ride  
521 Stempky Street  
Cheboygan Mi 49721  
ATTN: Transportation Manager

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Your signature

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Print your name

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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 Straits Regional Ride alleging

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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 1-231-597-9262, or write to me at 521 Stempky Street, Cheboygan, Michigan 49721.

Sincerely,

Title VI Coordinator

**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 Straits Regional Ride, 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

**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 Straits Regional Ride 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.

Straits Regional Ride 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 Straits Regional Ride, 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

## Appendix G

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).

Straits Regional Ride 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 Straits Regional Ride, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at Straits Regional Ride 521 Stempky Street. Cheboygan Mi. 49721.**

For more information, visit our website at [www.cheboygancounty.net/straits](http://www.cheboygancounty.net/straits) regional ride/title IV

## Appendix H

**Body Caucasian African American Asian Native American Pacific Islander Disabled Low Income**

**LAC 95% 1% 0% 4% 0% 45% 55%**  
**Committee**