

County Connection of Midland TITLE VI PLAN

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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).

County Connection of Midland, hereinafter referred to as AGENCY, 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 AGENCY in its administration and management of Title VI-related activities.

Title VI Coordinator Contact Information

Paulette Wazny, Human Resources/Benefit Manager
County Connection of Midland
884 E. Isabella Rd.
Midland, MI 48640-8326
(989) 631-5202 Ext. 307
Paulette.Wazny@etc-1.com

II. Title VI Dissemination

Title VI information posters (see Appendix G) shall be prominently and publicly displayed in the AGENCY facility and on their revenue vehicles. The name of the Title VI coordinator is posted and available at 884 E. Isabella Rd., Midland, MI 48640-8326 and on AGENCY website cc-om.org. Additional information relating to nondiscrimination obligation can be obtained from AGENCY Title VI Coordinator.

Nondiscrimination information shall be disseminated to AGENCY employees annually (see Appendix A). This information reminds employees of AGENCY policy statement, and of their nondiscrimination responsibilities in their daily work and duties. All employees of AGENCY are provided a copy of the plan and are required to sign an Acknowledgement of Receipt (see Appendix B).

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and AGENCY expectations to perform their duties accordingly.

III. Subcontractors and Vendors

All subcontractors and vendors who receive payments from AGENCY 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 AGENCY Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

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 or by e-mail with AGENCY at the following address:

County Connection of Midland
884 E. Isabella Rd., Midland, MI 48640-8326
Attn: Title VI Coordinator
(989) 631-5202 Ext. 307
(989) 631-4541
Paulette.Wazny@etc-1.com

NOTE: AGENCY 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.

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by AGENCY will be directly addressed by AGENCY. AGENCY shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, AGENCY 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 (see 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.

AGENCY 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 AGENCY, 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 AGENCY, a written response will be drafted subject to review by the transit's attorney. If appropriate, AGENCY'S attorney may administratively close the complaint. In this case, AGENCY 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: Title VI Investigations, Complaints, and Lawsuits

LIST ANY INVESTIGATIONS, COMPLAINTS, OR LAWSUITS IN FOLLOWING TABLE.

Lawsuits, Complaints, or Investigations Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken

VII. Four Factor Analysis

In order to prepare this Program, AGENCY undertook the U.S. DOT four-factor LEP analysis:

Factor 1: Number/Proportion of LEP Persons in Service Area

AGENCY examined the US Census report from 2020 and the Bureau's Demographic and Housing Characteristics and was able to determine that approximately 4.1%, or 3,281 people within the AGENCY service area age 5 and older spoke a language other than English. Of the 3,182 reporting they speak other languages than English, 233 or <1% of respondents speak English less than "very well." The other Indo-European language comprised the largest non-English speaking language group with 1.9%. The other largest non-English speaking language group was the Asian and Pacific Island language at 1.2%.

Factor 2: Frequency of Contact with LEP Persons

AGENCY assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, AGENCY has had no requests for interpreters and no requests for translated AGENCY documents in Midland County. Staff and vehicle operators have had very little to no contact with LEP persons.

There is no large geographic concentration of any type of LEP individuals in the AGENCY service area of Midland County. Services provided by AGENCY that are most likely to encounter LEP individuals are English as a Second language students and Northwood University students.

Factor 3: Nature and importance of the program, activity, or service provided by the program in people's lives

Access to the services provided by AGENCY is critical to the lives of many residents in the service area. Many people depend on AGENCY services for access to jobs and for access to essential community services like schools, shopping, and medical appointments. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

Factor 4: The resources available to AGENCY and overall costs.

AGENCY assessed the available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost, and which documents would be the most valuable to be translated when the populations would support it.

AGENCY currently partners with The Legacy Center for Community Success to assist in providing resources in relation to accessing a professional interpreter/ translation services or augmentative communication specialists. Staff and vehicle operating training would also be included in these resources.

After analyzing the four factors, AGENCY **does not** feel that a formal LEP plan is needed at this time.

Public Participation Plan

The AGENCY community and minority outreach plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness – AGENCY will proactively reach out to and engage low income, minority and LEP populations from the AGENCY service area.
- Respect - All feedback will be given careful and respectful consideration.
- Initiative-taking and Timeliness - Participation methods will allow for early involvement and be ongoing.
- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy, and complete.
- Responsiveness – AGENCY will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

As an agency receiving federal financial assistance, AGENCY has made the following community and minority outreach efforts since the last submission of a Title VI program:

AGENCY has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities.

AGENCY submits 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.

AGENCY actively participates in the county human services-transportation coordinated plan.

AGENCY currently publishes hours of service and any changes in route schedules. AGENCY (**County Board of Commissioners**) holds bi-weekly meetings that the public is invited to attend.

AGENCY has a complaint procedure that is available to the public at any time and is also available to the public via our website at cc-om.org.

Membership of Non-Elected Committees

The AGENCY service area has no concentration of minority individuals in Midland County (see table below).

Body	Caucasian	Latino	African American	Asian American	Native American
Population	92.40%	3.40%	1.40%	2.30%	.50%
Local Advisory Committee	100.00%	0%	0%	0%	0%

AGENCY is committed to ensuring that no person is excluded from participation in membership of the Local Advisory Council on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

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

MDOT Administrative Rule 202 requires that the applicant agency shall establish a LAC composed of three members. No LAC member shall be a staff or board member of the applicant agency. The applicant agency shall ensure all of the following: 1) 50% of the LAC membership represents persons who are 65 years of age or older and persons who have disabilities within the service area; 2) the LAC membership includes people who have diverse disabilities and the elderly who are users of public transportation; and 3) the applicant agency has approved at least one member, or 12% of the membership, jointly with the area on aging.

Equity Analysis

If AGENCY constructs a facility, such as a vehicle storage facility, maintenance facility, operations center, or other building, it will do a Title VI equity analysis following the procedures listed below:

The AGENCY shall complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

When evaluating locations of facilities, agencies should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.

If AGENCY determines that the location of the project will result in a disparate impact based on race, color, or national origin, AGENCY may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact based on race, color, or national origin.

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 County Connection of Midland 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 contact:

In all dealings with citizens, use courtesy titles (i.e., Mr., Mrs., Ms., or Miss) to respectfully 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 County Connection of Midland 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 4702.1B.

Employee signature

Print 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 to assist us in processing your complaint.

Please print clearly:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (home)

_____ (cell) _____ (message)

Are you filing this complaint on your own behalf? yes* no

*If yes to this question, please give that person’s information below.

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 all witnesses' names and phone numbers:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court? yes no

If yes, check all that apply:

- Federal Agency _____
- Federal Court _____
- State Court _____
- State Agency _____
- Local Agency _____

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone number: _____

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:

Paulette Wazny
Title VI Coordinator
County Connection of Midland
884 E. Isabella Rd.
Midland, MI 48640-8326
(989) 631-5202 Ext. 307
(989) 631-4541
Paulette.Wazny@etc-1.com

Your signature

Print 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 **County Connection of Midland** 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) 631-5202 Ext. 307 or write to me at this address.

Sincerely,

Paulette Wazny
Title VI Coordinator
County Connection of Midland
884 E. Isabella Rd.
Midland, MI 48640-8326
(989) 631-5202 Ext. 307
(989) 631-4541
Paulette.Wazny@etc-1.com

APPENDIX E Letter Notifying Complainant 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 **County Connection of Midland** 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,

Paulette Wazny
Title VI Coordinator
County Connection of Midland
884 E. Isabella Rd.
Midland, MI 48640-8326
(989) 631-5202 Ext. 307
(989) 631-4541
Paulette.Wazny@etc-1.com

APPENDIX F Letter Notifying Complainant 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 County Connection of Midland 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.

County Connection of Midland has analyzed the materials and facts pertaining to your case for evidence of the authority'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 County Connection of Midland, 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,

Paulette Wazny
Title VI Coordinator
County Connection of Midland
884 E. Isabella Rd.
Midland, MI 48640-8326

(989) 631-5202 Ext. 307
(989) 631-4541
Paulette.Wazny@etc-1.com

APPENDIX G

Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

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County Connection of Midland is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on 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 County Connection of Midland, or otherwise being discriminated against because of your race, color, or national origin, you may contact our office at:

Paulette Wazny
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For more information, visit our website at cc-om.org.