

Mecosta County Title VI Plan

County of Mecosta:

Date Adopted: February 4, 2010

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).

The County of Mecosta (County) 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.A.

This plan was developed to guide the County in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Controller/Administrator Paul E. Bullock
400 Elm St.
Big Rapids, MI 49307
TX: 231-796-2505
Email: pbullock@co.mecosta.mi.us

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in the County facilities and on their revenue vehicles. The name of the Title VI coordinator is available on the County's website, at co.mecosta.mi.us. Additional information relating to nondiscrimination obligation can be obtained from the County Title VI Coordinator.

Title VI information shall be disseminated to County employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the County'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 County'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. Subcontracts and Vendors

All subcontractors and vendors who receive payments from the County 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 the of County 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 Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with the County at the following address:

County of Mecosta
Office of the Controller
400 Elm St.
Big Rapids, MI 49307

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

The County 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 the County, 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

VI. Limited English Proficiency (LEP) Plan

According to the 2000 Census less than 2% of the Mecosta County population speaks English “less than well.” Mecosta County has completed a Four Factor Analysis and determined that we will monitor any changes in the non-English speaking population of our region. In over 20 years we have never received a request from a non-English speaking individual. Should there ever be a request for service from this demographic we can secure translation assistance through Ferris State University’s Language Department. At that time we can address a more detailed LEP Plan.

VII. Community Outreach

Community Outreach is a requirement of Title VI. Recipients and subrecipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.

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

Mecosta County Commission on Aging has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. Between 2005-2009, the public was invited to participate in these activities:

Coordinated Pubic Transit-Human Services Transportation Plan (Coordinated Plan). Federal transit law, as amended by Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users of 2005 (AFETEA-LU), requires that projects selected for under the Elderly and Individuals with Disabilities Program (Section 5310), Job Access and Reverse Commute Program (Section 5316), and New Freedom Program (Section 5317) be derived from a coordinated plan. Describe your plan development process which involved the public participation.

Our Transportation planning Board meets once every quarter to discuss transportation needs and evaluate solutions. Members from the community, aging and disabled population are represented at these meetings.

Monthly meeting with the Mecosta and Osceola Human Service Collaborative Body have proven a positive resource for sharing transportation concerns and brain storming on ways to improve the transportation services in both counties. Service agencies from youth to senior adults are available at these meetings to provide input and share resources

Board Meetings:

The Commission on Aging holds monthly Advisory Board and Senior Center Board meetings. The members of these Boards are seniors and offer their expertise in addressing transportation issues when needed. These meetings are publicized and open to the public.

Public Meetings: When new service is proposed information is disseminated to the neighborhoods affected and public meetings are scheduled. Transportation services are publicized in articles in the local newspaper, "The Pioneer", and our agency newsletter, the "Keyhole".

Travel Training Class: Mecosta County Commission on Aging has developed a travel training program to reach out to community groups (senior centers, senior facilities, the disabled community) to conduct travel training classes. Travel Training classes are

ongoing as well as outreach to these populations. Travel information is displayed at the Senior Center as well as satellite sites.

Customer Complaint Process: All riders are provided with a written complaint procedure and ridership policy. Mecosta County Commission on Aging complaint process was updated in 2008-2009.

General Awareness and Phone Surveys: We conduct onboard rider and general satisfaction surveys at a minimum of annually. In 2009 surveys were taken from the public regarding their perceptions of various public transportation programs. In 2009 outcomes reflected 99% of riders surveyed reported being picked up in a timely manner and arriving at their destination on time, 83% reported reduced isolation and 75% reported awareness of other services available in the community due to the transportation services received.

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.

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 County of Mecosta 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 Plan

I hereby acknowledge the receipt of the County of Mecosta'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.A.

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:

County of Mecosta
Office of the Controller
Title VI Coordinator
400 Elm St.
Big Rapids, MI 49307

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 the address listed above:

Your signature

Print your name

Date

APPENDIX D Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Big Rapids, MI 49307

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the County of Mecosta 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 231-796-2505, or write to me at this address.

Sincerely,

Name
Title VI Coordinator

APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Big Rapids, MI 49307

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the County of Mecosta 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

APPENDIX F Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Big Rapids, MI 49307

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the County of Mecosta 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 County 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 the County, 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,

Name
Title VI Coordinator

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 County of Mecosta 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.A. **If you feel you are being denied participation in or being denied benefits of the transit services provided by the County of Mecosta, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

County of Mecosta
Office of the Controller
Title VI Coordinator
400 Elm St.
Big Rapids, MI 49307

For more information, visit our website at co.mecosta.mi.us