

Eaton County Transportation Authority (Eatran)

Title VI Plan

Date Adopted: July 8, 2009

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).

Eatran 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 Eatran in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Donna Webb, General Manager
916 E. Packard Hwy
Charlotte Mi. 48813
Phone: (517-541-9308)
Email: dwebb@eatontrans.com

II. Title VI information Dissemination

Title VI information posters shall be prominently and publicly displayed in Eatran facility and on their revenue vehicles. The name of the Title VI coordinator is available on Eatran’s website, at eatran.com. Additional information relating to nondiscrimination obligation can be obtained from Eatran’s Title VI Coordinator.

Title VI information shall be disseminated to Eatran employees annually via the Employee Education form in payroll envelopes. This form reminds employees of Eatran’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 Eatran'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.

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Eatran 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 Eatran's 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 may be used to submit the complaint information. The complaint may be filed in writing with Eatran at the following address:

Eaton County Transportation Authority
916 E. Packard Hwy
Charlotte Mi, 48813

NOTE: Eatran 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, and 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 Eatran will be directly addressed by Eatran. Eatran shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Eatran 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. Please note that in responding to any requests for additional information, a complaint'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?

Eatran will send a final written response letter to the complainant. In the letter notifying complainant that the complaint is not substantiated, 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 Eatran, 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 Eatran, a written response will be drafted subject to review by the transit's attorney. If appropriate, Eatran's attorney may administratively close the complaint. In this case, Eatran 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. Limited English Proficiency (LEP) Plan

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

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or e-mail. LEP persons may obtain a copy of the plan on the EATRAN web site at www.eatran.com.

VII. Community Outreach

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

- **Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan).** The Capital Area Transportation Authority (CATA), Eaton County Transportation Authority (EATRAN) and Clinton Transit met to create a Coordinated Public Transportation and Human Services Transportation Plan. The primary goal of this effort is to develop a plan to improve public transportation service in Ingham, Eaton, and Clinton Counties. The service coordination strategies were developed by a Technical Committee and a Steering Committee, which were organized to provide input to the plan. The Technical Committee was comprised of representatives of CATA, EATRAN, Clinton Transit, Tri-County Regional Planning Commission, and the Michigan Department of Transportation. The Steering Committee was comprised of representatives of human service agencies, private sector transportation providers, local officials, and others with an interest in transportation in the Tri-County region.
- **Transit Improvement Plan (TIP).** The TIP is a fiscally constrained three-year planning document that addresses transportation projects and programs including: federal, state and local highways, transit ridesharing, bike paths and pedestrian facilities. If an item we wish to purchase is not in the TIP, it cannot be funded. The TIP process includes public hearings and public comment periods.
- **Board Meetings.** The Board of Directors holds monthly meetings and the public is invited to attend.
- **Customer Complaint Process.** Citizens may call Eatran to lodge a complaint or comment. All complaints/comments are then distributed to the relevant manager who researches the complaint and responds back to the citizen.
- **MDOT Annual Application.** 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.