

Milan Seniors for Healthy Living Policy

12.05.01-08.19 Title VI Plan

For MSHL's Transportation service

Adopted May 16, 2012, reviewed and readopted June 10, 2015, April 18, 2018, August 21, 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 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" (42 U.S.C. Section 2000d).

Milan Seniors for Healthy Living 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 Milan Seniors for Healthy Living in its administration and management of Title VI related activities.

Title VI Coordinator Contact information

Jennifer Michalak

45 Neckel Ct

Milan, MI 48160

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in MSHL's facility and on our revenue vehicles. The name of the Title VI coordinator is available on the MSHL's website, at www.milanseniors.org. Additional information relating to nondiscrimination obligation can be obtained from MSHL's Title VI Coordinator.

Title VI information shall be disseminated to MSHL's employees annually via the Employee Education form (see Appendix A). This form reminds employees of the MSHL'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 MSHL'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 MSHL 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 MSHL employees that have any dealings with the transportation service, indicating the receipt of the of MSHL'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 (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with MSHL at the following address:

Milan Seniors for Healthy Living
45 Neckel Ct
Milan, MI 48160

NOTE: MSHL encourages all complainants to certify all mail is sent through the U.S. Postal Service and/or ensure 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 MSHL will be directly addressed by MSHL. MSHL shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, MSHL 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?

MSHL will send a final written response letter (see Appendix E or F) to the complainant. If the complaint is found "not substantiated" (Appendix F), the complainant will also be advised of his or her right to: 1) appeal within seven calendar days of receipt of the final written decision from MSHL, 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

Milan Seniors for Healthy Living performed a four-factor analysis to determine the need for a Limited English Proficiency (LEP) Plan. Based on current demographics and demand for language assistance, it has been determined that a formal plan is not necessary. However, MSHL can provide meaningful access to LEP individuals in the following manner:

- Education and resources to assist in the identification of LEP individuals who need language assistance have been identified;
- Language assistance measures such as “I Speak” cards, and interpretation resources have been identified;
- LEP sensitivity training for staff will occur regularly
- The LEP plan will be monitored and updated regularly; and
- The LEP plan will be made available using a variety of media resources.

VII. Community Outreach

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

- MSHL will reference the Title VI Plan in the Transportation Users guide which is passed out to riders.
- The Title VI plan will be located on the MSHL website for review.
- Transportation issues are discussed and reviewed at the Board level. MSHL Board meetings are open to the public.
- A satisfaction survey is provided to all transit riders on a yearly basis. This survey is reviewed by the Executive Director, the Title VI Coordinator, and the MSHL Board of Directors.
- Customers’ complaints are forwarded to the director for review and investigation.

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 MSHL 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 and/or MSHL Executive Director.

Appendix B -- Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the MSHL 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

Date

Print your name

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 sent it to:

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:

Jennifer Michalak
Title VI Coordinator/ Executive Director
Milan Seniors for Healthy Living
45 Neckel Ct.
Milan, Michigan 48160
734-508-6229
jenniferm@milanseniors.org

Your signature

Print your name

Date

APPENDIX D -- Sample 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 MSHL 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 **734-508-6229** or write to me at this address.

Sincerely,

Jennifer Michalak
Title VI Coordinator/Executive Director
Milan Seniors for Healthy Living
45 Neckel Ct
Milan, MI 48160

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 MSHL 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,

Jennifer Michalak
Title VI Coordinator/Executive Director
Milan Seniors for Healthy Living
45 Neckel Ct
Milan, MI 48160

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 MSHL, 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.

MSHL has analyzed the materials and facts pertaining to your case for evidence of 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 MSHL, 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,

Jennifer Michalak
Title VI Coordinator/Executive Director
Milan Seniors for Healthy Living
45 Neckel Ct
Milan, MI 48160

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

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MSHL 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 MSHL, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Jennifer Michalak
Title VI Coordinator/Executive Director
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Milan, MI 48160
734-508-6229
www.milanseniors.org