

# **SAGINAW COUNTY COMMISSION ON AGING TRANSPORTATION SERVICES Title VI Plan**

**Agency Name: Saginaw County Commission on Aging**

## **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 Saginaw County Commission 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 Saginaw County Commission on Aging in its administration and management of Title VI-related activities.

### **Title VI Coordinator Contact**

Karen M. Courneya, Director  
Saginaw County Commission on Aging  
2355 Schust  
Saginaw, Michigan 48603  
989-797-6876  
kcourneya@saginawcounty.com

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

Title VI information posters shall be prominently and publicly displayed in the Administrative Offices of the Saginaw County Commission on Aging at 2355 Schust, Saginaw, Michigan 48603. The name of the Title VI coordinator will be displayed on the poster. Additional information relating to nondiscrimination obligation can be obtained from the Saginaw County Commission on Aging Title VI Coordinator.

During New Employee Orientation and subsequent employee trainings, information relative to the provisions of Title VI, and the Saginaw County Commission on Aging's expectations to perform their duties accordingly will be reviewed and discussed. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (**Appendix A & B**).

The Saginaw County Commission on Aging will ensure that all new riders are provided with a copy the Title VI Plan during intake/orientation. The plan will be passed out to all current riders upon its approval.

The Title VI Plan will be printed in the local news paper as part of the application process on a yearly basis. The Title VI plan will be located on the Saginaw County Commission on Aging website for review.

### **III. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from the Saginaw County Commission on Aging 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 Saginaw County Commission on Aging'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**

#### **Filing a Complaint:**

Any person can 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 (**APPENDIX C**):

- Complainant's name, mailing address, and viable contact information
- How, when, where and why the complainant believes that they were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that is deemed significant

The Title VI Complaint Form (Attached) may be used to submit the complaint information. The complaint may be filed in writing with the Saginaw County Commission on Aging at the following address:

Saginaw County Commission on Aging  
2355 Schust  
Saginaw, Michigan 48603

The Saginaw County Commission on Aging 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.

**Complaint process:**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Saginaw County Commission on Aging will be directly addressed by the Saginaw County Commission on Aging. The Saginaw County Commission on Aging 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 Saginaw County Commission on Aging 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.

**Notification of Complaint:**

The Saginaw County Commission on Aging will send a final written response letter (**Appendix E & F**) to the complainant. This written response may be drafted subject to review by the Saginaw County Commission on Aging's attorney. 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 Saginaw County Commission on Aging, 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**

The Saginaw County Commission on Aging (COA) 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, the COA can provide meaningful access to LEP individuals in the following manner:

- The COA has Three Spanish-speaking individuals on site to provide language assistance.
- For all other languages, limited English proficiency will be noted at the intake/orientation process. The COA has identified translation assistance from Saginaw Valley State University
- 7400 Bay Rd.
- Saginaw, Mi
- Telephone 989-964-4473

## **VII. Community Outreach**

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

- The Saginaw County Commission on Aging will ensure that all new riders are provided with a copy the Title VI Plan during intake/orientation. The plan will be passed out to all current riders upon its approval. Any questions or concerns may be forwarded to the Title VI Coordinator through the vehicle operator or an appointment may be made in person to discuss questions or concerns with the Title VI Coordinator.
- The Title VI Plan will be printed in the local news paper as part of the application process on a yearly basis. The Title VI plan will be located on the Saginaw County Commission on Aging's website for review.
- Transportation issues are discussed and reviewed at the Board level. All Saginaw County Commission on Aging Board meetings are open to the public and follow the Open Meetings Act as amended.
- A satisfaction survey is provided to all transit riders on a yearly basis. This survey is reviewed by the Director (Title VI Coordinator) and the Saginaw County Commission on Aging Board
- As a subcontractor to the local transit company (STARS), the Saginaw County Commission on Aging is involved in all coordinated committee meetings for public transportation.
- Customers' complaints are forwarded to the director for review and investigation.
- The Saginaw County Commission on Aging has available on site Spanish speaking individuals who can assist those persons either with information relative to transportation or with lodging complaints or concerns.

## **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 Saginaw County Commission on Aging 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 Director of the Saginaw County Commission on Aging.

**Appendix B**  
**Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge the receipt of the Saginaw County Commission on Aging 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 you 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 sent it to:

Provide address here

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:

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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:

Karen Courneya, Director  
Title VI Coordinator  
Saginaw County Commission on Aging  
2355 Schust  
Saginaw, Michigan 48603  
989-797-6876  
[kcourneya@saginawcounty.com](mailto:kcourneya@saginawcounty.com)

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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 the Saginaw County Commission on Aging 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 **989-797-6876**, or write to me at this address.

Sincerely,

Karen M. Courneya, Director  
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 the Saginaw County Commission on Aging 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,

Karen M. Courneya, Director  
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 the Saginaw County Commission on Aging, 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 Saginaw County Commission on Aging 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 Saginaw County Commission on Aging, 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,

Karen M. Courneya, Director  
Title VI Coordinator

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

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The Saginaw County Commission on Aging 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 Saginaw County Commission on Aging, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Karen Courneya, Director  
Title VI Coordinator  
Saginaw County Commission on Aging  
2355 Schust  
Saginaw, Michigan 48603  
989-797-6876  
[www.kcourneya@saginawcounty.com](mailto:www.kcourneya@saginawcounty.com)