

## **Title VI Plan**

**Agency Name: St. Joseph County Commission on Aging (COA)**

**Date Adopted: April 25, 2011**

### **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).

*St. Joseph County Commission on Aging (COA)* 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 *COA* in its administration and management of Title VI-related activities.

#### **Title VI Coordinator Contact information**

*Renee Gahan Welch, Activities Coordinator/Title VI Coordinator*

*St. Joseph County Commission on Aging (COA)*

*103 S. Douglas Street*

*Three Rivers, MI. 49093*

*Phone: 269 279-8083*

*Fax: 269 273-7058*

*E-Mail: [rwelch@sjccoa.com](mailto:rwelch@sjccoa.com)*

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

Title VI information posters shall be prominently and publicly displayed in the St. Joseph County Commission on Aging (COA) Main office; 103 South Douglas Street, Three Rivers Michigan, 49093 and on their revenue vehicles. The name of the Title VI coordinator is available on the *COA* website, at [www.sjccoa.com](http://www.sjccoa.com). Additional information relating to nondiscrimination obligation can be obtained from the *COA* Title VI Coordinator.

Title VI information shall be disseminated to *COA* employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the *COA* 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 *COA*'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 COA* 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 COA 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 COA* at the following address:

*St. Joseph County Commission on Aging (COA)  
Attn: Renee Gahan Welch  
103 S. Douglas Street  
Three Rivers, MI. 49093*

NOTE: *COA* 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 *COA* will be directly addressed by *the COA*. *The COA* 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 COA* 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 St. Joseph County Commission on Aging (COA)* 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 *COA*, 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 the COA, a written response will be drafted subject to review by the COA's attorney. If appropriate, the COA attorney may administratively close the complaint. In this case, the COA 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**

The St. Joseph County Commission on Aging (COA) maintains an updated Spanish translated COA Service Brochure. The COA will attend monthly Human Service meetings for coordination and communication with the MSU Extension agent for the Hispanic population and collaborate with the St. Joseph County Transit Authority for advertising in brochures, handouts, public postings and special events. The COA will also share printed material through aging network providers, healthcare professionals, local businesses and other service and civic organizations. The COA will maintain contact with Father Fabio of Holy Angels Catholic Church, Sturgis MI. and with Elizabeth Datkovic, Hispanic restaurant owner in order to provide marketing assistance by local translators that promotes public transportation to the Hispanic community. The COA currently has a bi-lingual (English/Spanish) speaking person employed with the agency who can be called upon for translation; Maria Olivares, Executive Secretary.

## **VII. Community Outreach**

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

**Local Advisory Committee Board Meetings.** The LAC holds quarterly meetings to discuss and implement marketing of the COA's transportation services and how to reach populations that are in most need of its services; how to improve services currently offered; discuss other counties transportation services that might benefit our county; and to meet and vote on the Vehicle Accessibility Plans for our own county's transportation agencies, which include the COA, St. Joseph Community Co-op and the St. Joseph County Transportation Authority. The public is invited to attend.

**Customer Complaint Process.** Citizens may call the St. Joseph County Commission on Aging (COA) to lodge a complaint or comment. All complaints/comments are given to the immediate supervisor. If supervisor is unavailable citizens may present problem to the St. Joseph County Commission on Aging Director. The supervisor researches the complaint and responds back to the citizen. The COA complaint process was updated in April 2011.

**General Awareness and Phone Surveys.** The COA conducts rider and general awareness surveys annually and share the results with the COA Board of Directors, St. Joseph County Transportation Authority and with the LAC Committee.

**Bilingual Outreach.** When holding meetings regarding services offered in our county, the COA, St. Joseph Community Co-op and the St. Joseph County Transportation Authority provides Spanish-speaking guests with information on public transit services in Spanish.

We submit to the Michigan Department of Transportation an application for funding. The application requests funding for capital assistance. Part of the application is a public notice, which includes a 30-day public comment period and/or; includes letters of support from the St. Joseph County Transportation Authority and other transportation providers in the county.

## **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 *St. Joseph County Commission on Aging (COA)* 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 St. Joseph County Commission on Aging (COA) 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 sent it to:

*Renee Gahan Welch, Title VI Coordinator, St. Joseph County Commission on Aging,  
103 S. Douglas Street, Three Rivers, MI. 49093.*

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: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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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:

Renee Gahan Welch  
Title VI Coordinator  
St. Joseph County Commission on Aging (COA)  
103 S. Douglas Street  
Three Rivers, MI. 49093

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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 *St. Joseph County Commission on Aging (COA)* 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 \_\_\_\_\_, or write to me at this address.

Sincerely,

Renee Gahan Welch  
Title VI Coordinator  
St. Joseph County Commission on Aging  
103 S. Douglas Street  
Three Rivers, MI. 49093

**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 St. Joseph County Commission on Aging (COA) 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,

Renee Gahan Welch  
Title VI Coordinator  
St. Joseph County Commission on Aging  
103 S. Douglas Street  
Three Rivers, MI. 49093

**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 St. Joseph County Commission on Aging (COA) 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 *COA* 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 *COA*, 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,  
Renee Gahan Welch  
Title VI Coordinator  
St. Joseph County Commission on Aging (COA)  
103 S. Douglas Street  
Three Rivers, MI. 49093

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

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St. Joseph County Commission on Aging (COA) 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 *COA*, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**  
**Renee Gahan Welch, Title VI Coordinator,**  
**St. Joseph County Commission on Aging (COA)**  
**103 S. Douglas Street, Three Rivers, MI. 49093**  
**269 279-8083.**

For more information, visit our website at [www.sjccoa.com](http://www.sjccoa.com).