

**CITY OF GREENVILLE
TRANSIT
Title VI Program**

Agency Name: City of Greenville Transit

Date Adopted: July 15, 2014

I. Program Statement

Section 601 under the Title VI of the Civil Rights Act of 1964 states: “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.”

The City of Greenville Transit operates a non-urban, demand-response transit system within the city boundaries. As a condition of receiving Federal Transit Administration (FTA) financial assistance from the U.S. Department of Transportation to operate these services, transit agencies must ensure that their programs, policies, and activities comply with DOT’s Title VI regulations. The ensuing program was developed to guide the City of Greenville Transit in its administration and management of Title VI-related activities, and details how the City of Greenville Transit meets the requirements as set forth in FTA Circular 4702.1B.

Title VI Coordinator Contact information

George M. Bosanic
City of Greenville
411 South Lafayette Street
Greenville, Michigan 48838

Phone: 616-754-5645
Fax: 616-754-6320
Email: gbosanic@greenvillemi.org

II. Title VI Information Dissemination

Title VI information posters (Appendix G) shall be prominently and publicly displayed in the City of Greenville Transit facility and in all their revenue vehicles. Additional information relating to nondiscrimination obligation can be obtained from the City of Greenville Transit Title VI Coordinator or from the city website at www.greenvillemi.org.

Title VI information shall be disseminated to the City of Greenville Transit employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the City of Greenville Transit’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 City of Greenville Transit's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Program and are required to sign the Acknowledgement of Receipt (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from City of Greenville Transit 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 City of Greenville Transit Title VI Program, 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

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Greenville Transit may file a Title VI Complaint by completing and submitting the agency's Title VI Complaint Form (appendix C). The City of Greenville, Transit investigates complaints received no more than 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. Be detailed and specify all issues and circumstances of the alleged discrimination.
- Other information that you deem significant

All Title VI and related statute complaints are considered formal-there is no informal process. Complaint must be in writing and signed by the complainant on the form provided. Complaints must be based on issues involving race, color or national origin. Title VI Complaints for discrimination may be filed with:

City of Greenville
Transit
c/o George Bosanic
411 South Lafayette Street
Greenville, Michigan 48838

NOTE: City of Greenville Transit 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 City of Greenville Transit will be directly addressed by the City of Greenville. The City of Greenville 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 City of Greenville 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?

The City of Greenville 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 City of Greenville Transit 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 City of Greenville Transit, a written response will be drafted subject to review by the City's attorney. If appropriate, the City of Greenville's attorney may administratively close the complaint. In this case the City of Greenville 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. Transit-Related Title VI Investigations, Complaints, and Lawsuits

Per FTA Circular 4702.1B, “all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin”:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits; and
- Complaints naming the recipient

Thus far, the City of Greenville, Transit has not received Title VI Investigations, Complaints or Lawsuits. Below is the list that will be used for tracking these incidents:

	Date	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.	N/A			
2.	N/A			
Lawsuits				
1.	N/A			
2.	N/A			
Complaints				
1.	N/A			
2.	N/A			

VII. Limited English Proficiency (LEP) Plan

Four Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to the City of Greenville’s transit services and activities that may affect their quality of life. Recommendations are then based on the results of the analysis.

1. The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range for four classifications of how well people speak English. The classifications are: ‘very well,’ ‘well,’ ‘not well,’ and ‘not at all.’ For our planning purposes, we are considering people that speak English less than ‘very well’ as Limited English Proficient persons.

As seen in Table #1, the Census 2007 – 2011 Data for the City of Greenville shows a small amount of the population that would speak English less than ‘very well.’

TABLE #1

LANGUAGE SPOKEN AT HOME	# of Individuals	Percentage
Population 5 years and over	7,578	7,578
English only	7,341	96.9%
Language other than English	237	3.1%
Speak English less than "very well"	118	1.6%
Spanish	50	0.7%
Speak English less than "very well"	40	0.5%
Other Indo-European languages	154	2.0%
Speak English less than "very well"	45	0.6%
Asian and Pacific Islander languages	33	0.4%
Speak English less than "very well"	33	0.4%
Other languages	0	0%
Speak English less than "very well"	0	0%

2. Frequency of Contact with LEP Individuals

The City, inclusive of Transit, has conducted an informal survey of our employees with regard to whether they have had encounters with LEP individuals in the performance of their job functions and found that there was only one department that reported encountering LEP individuals. We have offices accessible to the public and therefore accessible to LEP individuals and we have staff that work in the field that could encounter LEP individuals. Additionally, regular council meetings are held the first and third Mondays which would potentially bring LEP individuals to these meetings. Given the small concentration of LEP individuals, as displayed in Table #1 (above), the probability of our transit employees to encounter any LEP individual is very low.

3. The Nature and Importance of the Program, Activity, or Service to LEP

The City of Greenville serves individuals throughout the city in a variety of ways including managing roads, water, sewer, police, fire, elections, and other services to citizens of the city and individuals from outside of the city, such as visitors and those traversing the state. The nature of the services that the city provides is very important to

an individual's day-to-day life. Therefore the denial of services to an LEP individual could have a significant detrimental effect. Although the LEP population in the city is small, we will ensure accessibility to all of our programs, services, and activities.

4. The Resources Available to the City of Greenville and Overall Cost

US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

“Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan.”

The City of Greenville serves very few LEP persons and has very limited resources; therefore it has decided to include a LEP section in its Title VI Program in order to comply with the Executive Order.

Limited English Proficiency Plan

The City of Greenville has developed the following strategy to ensure those persons who do not speak English as their primary language and those who have a limited ability to read, write, or speak or understand English are accommodated:

- A. Below are tools to help identify persons who may need language assistance:
- Examine records requests for language assistance from past transit service records to anticipate the possible need for assistance in the future.
 - Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.
- B. The Greenville Transit has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least “well,” and the lack of resources available in the Greenville Transit service area:
- The Census Bureau's “I Speak Cards” will be available at the transit office and City Hall at all times.
 - When an interpreter is needed, in person or on the telephone, the Greenville Transit staff will attempt to determine what language is required. Staff shall use the telephone interpreter service – Language Line Services at <http://www.language.com>. On the Language Line home page the staff will select the Need an Interpreter Now link and follow the directions to receive an access code.
 - An oral interpolator may be located through the local college language department;

- The AltaVista Babel Fish website will be added to the favorites listing for easy access via Microsoft Internet Explorer on a computer located at the DART facility located at 981 Development Drive or at the Library. This will aid staff in the interpretation of services on a one on one basis for LEP individuals using DART.
- C. All Greenville Transit staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the Greenville Transit staff orientation process for new hires. Training topics are listed below:
- Understanding the Title VI policy and LEP responsibilities
 - Inform drivers of what language assistance services DART offers;
 - Use of LEP “I Speak Cards”;
 - How to access AltaVista Babel Fish via the computer at the DART facility or at the Library;
 - Documentation of language assistance requests;
 - How to use the Language Line interpretation and translation services;
 - How to handle a Title VI and/or LEP complaint (See Appendix B)
- D. Due to the lack of LEP population in Greenville and limited resources available in the transit program there is no formal process to provide appropriately translated notices to LEP persons. However, the following are a few options that Greenville Transit will incorporate when and or/or if the need arises:
- If staff know that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a know concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
 - When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma espanol estara disponible” This means “A Spanish translator will be available”.
 - Key print materials, including but limited to schedules and maps, will be translated and made available at the Greenville Transit dispatch office, on board vehicles and in communities when a specific concentrated LEP population is identified.
- E. This plan is designed to be flexible and is one that can be easily updated. At a minimum, the Greenville Transit will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the City of Greenville;

- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Greenville Transit programs? Are there other programs that should be included?
- Have the Greenville Transit's available resources, such as technology, staff, and financial costs changed?
- Has the Greenville Transit fulfilled the goals of the LEP Plan? and
- Were any complaints received?

F. Since the last LEP Plan was submitted the City of Greenville Transit has not encountered anyone with limited English proficiency. Neither has there been any changes in the types of languages where translation services are needed. The language assistance programs that the Greenville has implemented are still adequate and the LEP Plan goals have been met. Greenville Transit has not received any Title VI complaints.

VIII. Public Participation

As an agency receiving federal financial assistance, since the last Title VI program submission, the City of Greenville Transit has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public is invited to participate in these activities:

Council Meetings Greenville City Council conducts regular meetings on the first and third Mondays of each month where the public is invited to attend and make comments regarding Transit. Currently these meetings are live streamed on the internet. An archive of past meetings is available as well as all current and past agendas and minutes. These public meetings are advertised in advance by official postings at City Hall, on the internet, local radio stations, and newspapers. The public is given an opportunity to speak on any topic at every council, including Transit.

Customer Complaints Citizens may call the City Manager's Office to lodge a complaint or comment. All complaints/comments are distributed to the relevant manager who researches the complaint and responds back to the citizen.

Annual Application City of Greenville Transit submits 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.

Local Advisory Committee Public comments can be directed to the members of the Local Advisory Committee, which meets annually during the Michigan Department of Transportation annual application process.

IX. Table Depicting Minority Representation on Committees and Councils Selected By City of Greenville Transit

Below is a table depicting the membership of non-elected committees and councils directly associated with City of Greenville Transit. The table below shows the membership of this council, broken down by race. That council currently has three (3) members are either transit users, have a disability, or are 65 years of age or older. One member is appointed jointly with the Local Area Agency on Aging.

Minorities are strongly encouraged to participate. Transit staff encourage their ridership to participate in this council. Residents of several low-income housing facilities are notified of vacancies and encouraged to participate.

Body	Caucasian	African American	Native American	Asian	Hispanic	Other
Population	94.29%	.32%	.47%	.67%	2.46%	1.79%
Local Advisory Council	100%	0	0	0	0	0

IX. Title VI Equity Analysis of Facilities Construction

The City of Greenville, Transit shall complete a Title VI equity analysis during the planning state with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The City of Greenville, Transit shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various sitting alternatives, and the analysis must occur before the selection of the preferred site.

When evaluating locations of facilities, the City of Greenville, Transit should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

If the City of Greenville Transit determines that the location of the project Greenville Transit may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The City of Greenville Transit must show how both test are met; it is important to understand that in order to make this showing, the City of Greenville Transit must consider and analyze alternatives to determine whether those alternative would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Appendix A Employee Annual Education Form

Title VI Policy

No person 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.

All employees of the City of Greenville Transit 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 George Bosanic, 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 Program

I hereby acknowledge the receipt of the City of Greenville Transit's Title VI Program. I have read the program 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.B

Your signature

Print your name

Date

Section IV:

Have you previously filed a Title VI complaint with this agency? _____ Yes _____ No

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court: _____ Yes _____ No

If yes, check all that apply and please provide information about a contact person (name, title, agency name, address, telephone number) at the agency/court where the complaint was filed:

Federal Agency: _____

Federal Court: _____

State Court: _____

State Agency: _____

Local Agency: _____

Section VI:

Please provide the name of the agency the complaint was against and a contact person, title and telephone number:

You may attach any written materials or other information that you think s relevant to your complaint.

Sign and date below

Your signature

Print your name

Date

Please submit this form, either in person or by mail to the Title VI Coordinator at:

City of Greenville
Transit
c/o George Bosanic
411 South Lafayette Street
Greenville, Michigan 48838

APPENDIX D Letter Acknowledging Receipt of Complaint

[Date]

[Name]
[Street Address]
[City]

Dear []:

This letter is to acknowledge receipt of your complaint against the City of Greenville Transit alleging a violation of Title VI of the Civil Rights Act of 1964, more specifically,
_____.

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 616-754-5645 or write to me at this address.

Sincerely,

George Bosanic
Title VI Coordinator
Greenville Transit
411 South Lafayette Street
Greenville, Michigan 48838

APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

[Date]

[Name]

[Street]

[City, State, Zip]

Dear []

The complaint referenced in your letter dated [] alleging a Title VI violation by Greenville Transit has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including [the one/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,

George Bosanic
Title VI Coordinator
Greenville Transit

APPENDIX F Letter Notifying Complainant that the Complaint Is Not Substantiated

[Date]

[Name]

[Street Address]

[City, State, Zip]

Dear []:

The matter referenced in your complaint of [date] against the City of Greenville Transit 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 City of Greenville Transit 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 (7) calendar days of receipt of this final written decision from City of Greenville Transit 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,

George Bosanic
Title VI Coordinator
Greenville Transit

**APPENDIX G: CITY OF GREENVILLE TRANSIT
TITLE VI PUBLIC NOTICE**

The City of Greenville Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Greenville Transit.

For more information on the City of Greenville Transit's civil rights program, and the procedures to file a complaint, contact 616-754-5645; or go online at www.greenvillemi.org; or email gbosanic@greenvillemi.org; or visit our administrative offices located at 411 South Lafayette Street, Greenville, Michigan 48838.

A complainant may be filed directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, please contact 616-754-5645.