

Champaign Transit System

Title VI Plan

Adopted October 18, 2012

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).

Champaign Transit System (CTS) 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.B.

This plan was developed to guide CTS in its administration and management of Title VI related activities.

Title VI Coordinator Contact information

Gary Ledford
CTS Director
308 D Miami Street
Urbana, Ohio 43078
937-653-8777

Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in all CTS facilities and on the all transit vehicles. The name of the Title VI coordinator is listed above. Additional information relating to nondiscrimination obligation can be obtained from the CTS Title VI Coordinator.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and CTS'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 A).

Subcontracts and Vendors

All subcontractors and vendors who receive payments from CTS 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.

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 CTS 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.

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 B) may be used to submit the complaint information. The complaint may be filed in writing with CTS at the following address:

CTS
308 D Miami Street
Urbana, Ohio 43078

NOTE: CTS 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 once is it submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by CTS will be directly addressed by CTS. CTS shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, CTS 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 C) to the complainant. 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?

CTS will send a final written response letter (see Appendix D or E) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix E), the complainant is also advised of his or her rights to: 1) appeal within seven calendar days of receipt of the final written decision from CTS, and/or 2) file a complaint externally with the Ohio Department of Transportation, 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.

If an attorney is retained by CTS, the following sample language will be inserted in the written response:

Once sufficient information for investigating the complaint is received by CTS, a written response will be drafted subject to review by the transit's attorney. If appropriate, the CTS attorney may administratively close the complaint. In this case, CTS 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 office:

The Ohio Department of Transportation
Office of Public Transportation
1980 West Broad Street
Columbus, Ohio 43223

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

Limited English Proficiency (LEP) Plan

CTS will use the following guidelines to assist persons with limited English proficiency.

1. If an interpreter is needed immediately, in person or on the telephone, staff will document this need and contact an interpreter for assistance.
2. CTS will educate its staff on the following procedures:
 - a. Understanding the Title VI Policy and LEP responsibilities;
 - b. How to access language assistant contracted interpreter services;
 - c. Document language assistance requests; and
 - d. Follow the procedures if a Title VI and/or LEP complaint is filed.

Appendix A

Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of CTS's 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 CTS's 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.

Employee signature

Print your name

Date

Appendix B

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 send it to:

Gary Ledford
Title VI Coordinator
Champaign Transit System (CTS)
308 D Miami Street
Urbana, Ohio 43078

Please print clearly:

Name:

Street Address:

City, State, Zip Code:

Telephone Numbers: (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:

Gary Ledford, Title VI Coordinator
Champaign transit System (CTS)
308 D Miami Street
Urbana, Ohio 43078

Your signature

Print your name

Date

APPENDIX C

Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Champaign County Transit System (CTS) 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 937-653-8777, or write to me at this address.

Gary Ledford, Title VI Coordinator
Champaign Transit System (CTS)
308 D Miami Street
Urbana, Ohio 43078

Sincerely,

Gary Ledford, Title VI Coordinator

APPENDIX D

Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against Champaign Transit System (CTS) 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,

Gary Ledford, Title VI Coordinator
Champaign Transit System (CTS)
308 D Miami Street
Urbana, Ohio 43078

APPENDIX E

Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against Champaign Transit System (CTS) 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.

CTS has analyzed the materials and facts pertaining to your case for evidence of its 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 CTS and/or 2) file a complaint externally with the Ohio Department of Transportation, Office of Transit; the U.S. Department of Transportation and/or the Federal Transit Administration at:

The Ohio Department of Transportation
Office of Public Transportation
1980 West Broad Street
Columbus, Ohio 43223

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,

Gary Ledford, Director, Title VI Coordinator

APPENDIX F

List of Investigations, Lawsuits and or Complaints

	Date	Summary	Status	Action
	(month, day, year)	(basis, color, race)		
Investigations	NONE AS OF 10/4/2012 nor in the preceding 12 months			
1.				
2.				
Lawsuits	NONE AS OF 10/4/2012 nor in the preceding 12 months			
1.				
2.				
Complaints	NONE AS OF 10/4/2012 nor in the preceding 12 months			
1.				
2.				

Please Use other pages or attachments if necessary to explain.