

Blue Water Community Action

Title VI Program

Updated: 2/1/18

Title VI program Requirements:

Section

1. Title VI Notice to the Public, including a list of locations where the notice is posted
2. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
3. Title VI Complaint Form
4. List of transit-related Title VI investigations, complaints, and lawsuits
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
6. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
8. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
9. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent
11. Service Standards and Policies

Section 1. Title VI Notice to the Public, including a list of locations where the notice is posted

Public Notice

**NOTIFYING THE PUBLIC OF RIGHTS UNDER
TITLE VI
BLUE WATER COMMUNITY ACTION**

Blue Water Community Action (BWCA) operates its program 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 BWCA.

For more information on BWCA civil rights program, and the procedures to file a complaint, contact the HR Director at (810) 982-8541 or visit our offices at 302 Michigan Street, Port Huron, Michigan.

A complainant may file a complaint 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 more information is needed in another language, contact (810) 982-8541.

To ensure that our drivers understand our obligations and our passengers understand their rights, BWCA has posted our *Title VI Notice to the Public* in easily accessible locations. The notice has been posted:

1. At BWCA's main office.
2. On BWCA's website located at <http://www.bwcaa.org>.

Section 2. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)

**Blue Water Community Action
Title VI Complaint Procedures**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by BWCA (hereinafter referred to as “the Agency”) may file a Title VI complaint by completing and submitting the Agency’s Title VI Complaint Form. The BWCA investigates complaints received no more than 180 days after the alleged incident. The Agency will process complaints that are complete.

Once the complaint is received, the Agency will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. If our office has jurisdiction and will investigate the complaint, the case will be assigned to the designated Title VI officer of the Agency and he/she will document all aspects of the investigation in a Title VI complaint log. The Agency has 30 days to investigate the complaint. If more information is needed to resolve the case, the Agency may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the Agency can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the Complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Ave., SE, Washington, DC 20590.

Section 3. Title VI Complaint Form

See Attachment A

Section 4. List of transit-related Title VI investigations, complaints, and lawsuits

None since last submission.

Section 5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission

In addition to the public outreach that Blue Water Area Transit Commission has performed, BWCA has reviewed the Title VI program over the past year and the public that we serve appears well informed that the program exists. The Title VI Notice to the Public is posted in our main office along with our website.

Blue Water Area Transit Commission (BWATC) has:

- a. Hosted various Local Advisory Committee (LAC) meetings on our ADA accessible premises 4 to 5 times per year. All LAC meetings are open to all people in the community and BWATC does not select members of the Committee. These meetings have a variety of people who represent many different demographic profiles of the community.
- b. BWATC has worked directly with nine not-for-profit agencies in the past three years that deal mainly with low-income and minority issues. They incorporated them into their county-wide coordinated and consolidated transportation program. Working with these agencies, low-income and minorities had their transportation needs evaluated to see if existing public transportation would meet their needs or if they needed transportation help from BWATC Mobility Manager. By working with these agencies on a day to day basis, a great deal of transportation information was disseminated throughout the community.
- c. BWATC has performed an analysis of Public Participation since their last submission and public participation has been strong. They found that LAC meetings are open to the public and held at BWATC's Admin/Maintenance Facility at 10:30 am on the fifth Tuesday of the month for each calendar quarter and one meeting in January. BWATC's facility is ADA accessible and accessible via public transportation. BWATC performs outreach for participation in LAC meetings through the St. Clair County Community Services Coordinating Body which is a coalition of over 60 health and human service organizations in the county as well as posting LAC meeting times and dates at the City of Port Huron Offices and the County Library. A review of meeting attendees shows that past meetings have been attended by users of public transportation, disabled persons, low-income persons, persons representing the elderly, and staff from agencies that service all of the above. Participation in LAC meetings has been strong and there have been no requests to change venue or the date and time of the meeting.

Section 6. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance

BWCA relies on Blue Water Area Transit Commission's 4 factor LEP analysis to determine if LEP individuals are being identified and serviced by public transportation in our service areas.

Section 7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees

BWCA has no such committees and/or councils.

Section 8. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions

Not applicable.

Section 9. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

Not applicable.

Section 10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent

The Board of Directors has approved the BWCA Title VI Program at their March 27, 2018 meeting. A motion to approve was made by Martha Macauley; supported by Ken Harris. Motion carried.

Section 11. Service Standards and Policies

Not applicable.