

**SAGINAW COUNTY COMMISSION ON AGING
TRANSPORTATION SERVICES
Title VI Program**

Agency Name: Saginaw County Commission on Aging

I. Program 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 4702.1B.

This Program was developed to guide the Saginaw County Commission on Aging in its administration and management of Title VI-related activities.

II. Title VI Coordinator Contact

Jessica L. Sargent, Director
Saginaw County Commission on Aging
2355 Schust
Saginaw, Michigan 48603
989-797-6876
jsargent@saginawcounty.com

III. 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 Road, 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 (**Appendix G**).

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 Program 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 Program during intake/orientation. The program will be passed out to all current riders upon its approval.

Reference to the Title VI Program will be included in the public notice placed in the local newspaper for the annual application process. The Title VI Program will be located on the Saginaw County Commission on Aging website for review.

IV. Title VI complaint Procedures and Complaint Form

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 and 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 (**Appendix C**) 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 Road, Saginaw, MI 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

V. Transit related Title VI Investigations, Complaints and Lawsuits

There have been no complaints, public transit investigations or lawsuits received in regards to the Title VI Program for the Saginaw County Commission on Aging.

VI. Community Outreach-Public Participation Plan

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 of the Title VI Program during intake/orientation. The Program 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 Program 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.
- Customer complaints are forwarded to the Director for review and investigation.

- The Saginaw County Commission on Aging has an available on-site Spanish speaking individual who can assist those persons either with information relative to transportation or with lodging complaints or concerns.
- Since the adoption of the Title VI Program on August 11, 2010, the Saginaw County Commission on Aging has conducted its outreach program as outlined in this section. The agency participates in local health fairs and local public held events where all our services are showcased annually. Specific health fairs such as the Senior Healthy Living Expo, in collaboration with the Saginaw YMCA, provides an opportunity to target seniors in the community with information relative to available transportation. Vendor attendance at the Latino Resource Fair by the Mexican-American Council, BWell Saginaw Health Equity Council, and LLEAD provide services to minority populations. Attendance at other local events provides an opportunity to provide transportation information where underserved populations will be in attendance. The above-named examples are just a few of the sites where we provide information to the community relative to our services which are available to them. Updates are provided on a regular basis to our participants at the Hispanic Senior Center, as well as our other centers which may be located in impoverished areas of the city and county. Specific to the Hispanic Center, updates on our services are provide in Spanish and English to ensure that those who cannot speak English and those who are unable to read, are made aware of available services and programs available to them in the community.

VII. Limited English Proficiency (LEP) Four Factor Analysis

Determine the number of LEP persons eligible to be served or likely to be served or likely to be encountered by a program, activity, or service.

Census Data for LEP persons who would be eligible for transportation services (at least 60 years of age) is not available. Such census data encompasses LEP individuals who are at least eighteen years of age.

The next best method to determine the likelihood of encountering LEP individuals would be examining the demographics for the number of individuals who are provided transportation services on a yearly basis. There were no reports of staff recognizing the need for language assistance and there were no requests for language assistance by riders.

The Saginaw County Commission on Aging participates in local health fairs and community events each year. The Agency's information specialist provides information on all agency programs and services available to the public and services. All program information is provided in English and Spanish and there is currently an agency staff member who is fluent in Spanish to provide information to those attending these events should the need arise.

Determine the Frequency with which LEP persons come in contact with the program.

In addition to direct contact by riders, Commission on Aging staff have over 15 staff who have regular contact with older adults in the community who would be eligible for transportation services. They are educated to be able to recognize the need of language assistance for those older adults to access services in the community.

Determine the importance of the program, activity, or service to people's lives.

The Commission on Aging provides transportation for life supporting dialysis treatments, cancer treatments, and physician appointments. Because our transportation is the only door-to-door transportation for older adults available in Saginaw County, many older adults who are unable to safely ambulate, and are fall risks, depend on their ability to utilize our transportation. Utilizing other modes of transportation could conceivably put them at medical risk of falling and entering long term care.

Determine the resources available and cost.

The Saginaw County Commission on Aging's transportation program has not encountered or served LEP individuals. Based on past experiences, the number of LEP individuals for future services would be extremely low. The agency has very limited resources and therefore it has decided to include a LEP section in its Title VI Program in order to comply with federal requirements.

VIII. Language Assistance Plan (LAP)

Language Assistance cards are posted in English and Spanish at all of the program sites and in the transportation vehicles. Immediate on-site assistance is available for Spanish Speaking persons should the need be identified. Translating services are also available from the local University if the need arises with advance notification.

IX. Saginaw County Commission on Aging Board

The Saginaw County Commission on Aging Board members are appointed by the members of the Saginaw County Board of Commissioners, who attempt to locate and appoint members to reflect the population served by the Commission on Aging. The County of Saginaw is diverse both to the ethnicity of its residents as well as the geographical location of the population, with older adults living in the City of Saginaw, suburban and rural areas.

Body	Caucasian	Latino	African American	Asian American	American Indian
Population	75.9%	9.3%	19.2%	1.3%	0.6%
Board Members	70.0%	0.0%	30.0%	0.0%	0.0%

X. 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.

XI. Title VI Program Equity Analysis

In the event that the Saginaw County Commission on Aging remodels or builds a new facility we will follow the policies and procedures required by MDOT and the Federal government as indicated in FTA Circular 4702.1B in the entire programing of such a facility.

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 Program

I hereby acknowledge the receipt of the Saginaw County Commission on Aging 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 4702.1B.

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.

Please print clearly:

Section I:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (home) _____ (cell)

Email Address: _____

Accessible Format Requirements? () Large Print () Audio Tape () TDD () Other

Section II:

Are you filing this complaint on your own behalf? _____ yes _____ no

*If you answered “yes” to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. _____ Yes _____ No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

_____ race or color

_____ national origin

_____ income

_____ other

Date of alleged discrimination (Month, Day, Year): _____

Where did the alleged discrimination take place: _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as name(s) and contact information of any witnesses. If more space is needed, please use the back of this form.

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:

- Federal Agency: _____ Federal Court: _____
- State Agency: _____ Local Agency: _____
- State Court: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____
 Title: _____
 Agency: _____
 Address: _____
 Telephone: _____

Section VI:

Name of agency complaint is against: _____
 Contact person: _____
 Title: _____
 Telephone number: _____

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

Signature and date required below:

Signature _____ Date _____

Please submit this form in person at the address below, or mail this form to:

Jessica L. Sargent, Director
 Saginaw County Commission on Aging
 2355 Schust
 Saginaw, Michigan 48603
 989-797-6876
jsargent@saginawcounty.com

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. **Jessica Sargent, Director, Title VI Coordinator, Saginaw County Commission on Aging, 2355 Schust Road, Saginaw, Michigan 48603, jsargent@saginawcounty.com.**

Sincerely,

Jessica L. Sargent, Director
Title VI Coordinator
Saginaw County Commission on Aging
2355 Schust
Saginaw, Michigan 48603
989-797-6876
jsargent@saginawcounty.com

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,

Jessica L. Sargent, Director
Title VI Coordinator
Saginaw County Commission on Aging
2355 Schust
Saginaw, Michigan 48603
989-797-6876
jsargent@saginawcounty.com

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,

Jessica L. Sargent, Director
Title VI Coordinator
Saginaw County Commission on Aging
2355 Schust
Saginaw, Michigan 48603
989-797-6876
jsargent@saginawcounty.com

APPENDIX G
TITLE VI NOTICE TO THE PUBLIC

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 of the Civil Rights Act of 1964 and Federal Transit Administration (FTA) Circular 4701.1B.

For more information on Title VI or to file a complaint, contact:

Jessica L. Sargent, Director
Saginaw County Commission on Aging
2355 Schust
Saginaw, Michigan 48603
989-797-6876
jsargent@saginawcounty.com