



PLANNING DEPARTMENT

Division of Transit

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Subject: Title VI – Civil Rights

Effective Date: September, 30 2017

Replaces: All previous

Purpose:

To ensure that Sandusky Transit System (STS) is in compliance with state and federal laws relating to Title VI of the Civil Rights Code.

Responsibilities:

The Transit Administrator will ensure that STS complies with law and completes all reporting requirements.

Related Documents:

Attachment 1 Title VI Complaint Procedure

Attachment 2 Title VI Complaint Form

Attachment 3 Public LEP Outreach

Attachment 4 Title VI List of Investigations, Complaints and Lawsuits

Attachment 5 Notifying the Public of Rights Under Title VI

Policy:

STS adheres to Title VI of the Civil Rights Act of 1964 as amended, Section 601. This section states, “No person in the United States 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.” STS submitted the Title VI Assurances to the ODOT Office of Transit with the initial application for federal funding and will submit updates annually to the Office of Transit with an update to FTA every three years.

In accordance with Title VI regulations, STS will not:

- Deny any protected individual service, financial aid, or benefit under the program
- Provide any service, financial aid, or benefit that is different for protected individuals from that provided to others
- Subject a protected individual to segregation or separate treatment
- Restrict a protected individual in the employment of any advantage or privilege enjoyed by others
- Treat protected individuals differently in terms of whether they satisfy admission, eligibility, or membership requirements
- Deny a protected individual the opportunity to participate in the provision of services
- Deny a protected individual the opportunity to participate as a member of a planning or advisory body
- Use criteria or methods of administration that have the effect of subjecting individuals to discrimination
- Make decisions in regard to facility location with the purpose of subjecting persons to discrimination

- Discriminate with regard to the routing, scheduling, or quality of transit service
- Use race, color, or national origin as a basis for determining frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes

In accordance with Title VI regulations, STS will take affirmative action to assure non-discrimination including the following eight required actions:

1. Develop Title VI Complaint Procedures.
2. Record Title VI investigations, complaints, and lawsuits
 - a. Maintain a list of active investigations conducted by entities other than FTA, lawsuits or complaints alleging discrimination
 - i. Date filed
 - ii. Summary of allegation
 - iii. Current status
 - iv. Actions taken in response
 - b. Notify ODOT immediately in the case of a lawsuit or complaint alleging discrimination
3. Provide meaningful access to persons with Limited English Proficiency – benefits, services, information, and other important portions of their programs.
4. Notify beneficiaries of Title VI protections
 - i. Disseminate information to the public. STS will include a statement on all printed materials indicating that we will operate programs without regard to race, color, national origin, sex, age, income, or disability
 - b. Use a variety of dissemination methods
 - c. General notification
 - d. Document translation
5. Provide additional information upon request
6. Prepare and submit a Title VI program and report information as part of our ODOT grant
7. Analyze impact of construction projects in accordance with the National Environmental Policy Act (NEPA) and ODOT procedures.
8. Promote inclusive public participation by conducting public outreach and involvement activities with minority and low-income individuals.

STS will encourage public participation in advisory boards and councils to aid in public transportation decision-making without regard to race, color, or national origin. Below is a breakdown of STS’s elected governing commission categorized by race.

	Caucasian	Latino	African American	Asian American	Native American and Other
Population	85%	4%	9%	1%%	1%
Governing Body	57%		43%		

STS Title VI Complaint Procedure

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

Once the complaint is received, STS 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.

STS has 30 days to investigate the complaint. If more information is needed to resolve the case, STS 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, STS 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 Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223.

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

STS TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail 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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Date of Alleged Discrimination (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all person (s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____ _____ _____ _____ _____ _____ _____ _____ _____				

Sandusky Transit System's (STS) LEP Outreach Efforts

All hearings and meetings are held in an accessible location at times that are convenient for minority and Limited English Proficiency (LEP) communities. STS participates in speaking engagements. If staff is presenting a topic that could be of potential importance to an LEP person or hosted a meeting/workshop in a concentration of LEP person, an interrupter can be available. STS's key printed materials such as rider guides, maps and Title VI information are available in English and alternative formats upon request.

Sandusky City staff attends the Sandusky Community Relations Commission quarterly meeting and is active in neighborhood programs and outreach. STS also works closely with other agencies that serve minority, low-income, and LEP populations daily to assure that public outreach and involvement efforts are effective.

As a public service agency, STS is eager to ensure that it is meeting the needs of the public to the best of its ability.

STS's LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Period: January 1, 2012 – September, 2017

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1. NONE				
2.				
Lawsuits				
1. NONE				
2.				
Complaints				
1. NONE				
2.				