



Title VI Plan

Agency Name: Detroit Department of Transportation (DDOT)

Date Adopted: April 1, 2011

I. 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).

Detroit Department of Transportation (DDOT) 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.A.

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

Title VI Coordinator Contact information:

Title VI Coordinator
Administration Division
Detroit Department of Transportation
1301 E. Warren Ave.
Detroit, MI 48207
313-833-7695 (O)
313-833-5338 (F)
DDOTtitle6@detroitmi.gov

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in DDOT facilities and in its revenue vehicles. The name of the Title VI coordinator is available on the DDOT's website at www.RideDetroitTransit.com, or alternatively, on the City of Detroit website: www.detroitmi.gov. Additional information relating to nondiscrimination obligation can be obtained from the DDOT Title VI Coordinator.

Title VI information shall be disseminated to DDOT employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of DDOT'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 DDOT's expectation that they 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 form (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from DDOT 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 shall maintain permanent records, which include, but are not limited to, signed employee acknowledgements of receipt of the DDOT 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.

APPENDIX A - Nondiscrimination Complaint Procedures

DDOT's Procedure for Handling Title VI Complaint

1.0 Purpose

This complaint procedure is designed to provide guidance on the identification, reporting and investigation of complaints asserting claims arising under Title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations (“Title VI”). Title VI prohibits discrimination on the basis of race, color and national origin and provides that no person shall be excluded from participation, denied the benefits of, or be subjected to discrimination under federally-funded program or activity, including the services and other transit-related benefits provided by the Detroit Department of Transportation (DDOT). Title VI does not cover employment-related discrimination complaints arising under Title VI of the Civil Rights Act of 1964 and other statutes, all of which are governed by other policy instructions.

2.0 Scope

This procedure applies to all DDOT divisions responsible for receiving, identifying reporting, processing and resolving complaints of discrimination asserted under Title VI.

3.0 Definitions

3.1 Administrative Closure: A complaint that is closed without an investigation.

3.2 Complainant: An individual who files a Title VI Complaint.

3.3 Discrimination: Any act or any failure to act, which has the effect of excluding or denying a person from participation in benefits, or has otherwise, subjected a person to unequal treatment under any program or activity, including transit service and other benefits, because of race, color, or national origin.

3.4 Title VI Complaint: A complaint alleging a violation of Title VI made by a Complainant, and filed with the DDOT Office of Contract Compliance. Only Complaints alleging discriminating in transit services and related benefits provided by DDOT on the basis of race, color or national origin discrimination will be considered Title VI complaints for purposes of this Policy/Instruction.

3.5 Title VI Program: The system of requirements, procedures and actions adopted by DDOT and approved by the Federal Transit Administration (FTA), which are deemed necessary and appropriate to comply with Title VI, Civil Rights Act of 1964.

4.0 RESPONSIBILITES

4.1 Title VI Coordinator: Reports to DDOT's Director and is responsible for processing and monitoring the Title VI Program. The Title VI Coordinator shall exercise all powers delegated by the Director, including, but not limited to the receipt, acknowledgement, investigation, review, final disposition and reporting of Title VI complaints. Written responses to Title VI complaints shall include language that states:

“DDOT is committed to ensuring that no person is excluded from participation in, denied the benefits of its services or subjected to discrimination under Title VI, Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Detroit Department of Transportation's Title VI Coordinator, Administration Division, Denise Vaughn, 1301 East Warren, Detroit, Michigan 48207.”

4.2 Office of Contract Compliance: Reports to the Director (Title VI Coordinator) and is responsible for receiving and identifying Title VI complaints.

4.3 Customer Service Unit: Receives complaints alleging violation of Title VI and is responsible for forwarding complaints to the Office of Contract Compliance for processing and monitoring.

5.0 Procedure

5.1 How to file a Title VI Complaint

Title VI complaints must be filed within 180 days of the most recent allegation of discrimination. The complaint must include the following information:

- A written statement of facts supporting the allegation of discrimination, including the date of the alleged discrimination, the location and the names, addresses and telephone numbers of any witnesses;
- The complainant's name, address, telephone number, or other method of communicating with the complainant;
- The type of discrimination alleged, i.e. race, color, or national origin;
- The transit service or other related benefit, which the complainant was allegedly denied;
- The complainant's signature.

The complaint must be filed in writing with DDOT's Office of Contract Compliance as follows:

Title VI Coordinator
Administration Division
Detroit Department of Transportation
1301 East Warren Ave.
Detroit, Michigan 48207
313-833-7695 (O)

Complaints may also use the following email address to initiate the filing of a complaint:

DDOTtitle6@detroitmi.gov

When a complaint is called in, the Customer Service Unit receives the call. Customer Service inputs the following information in the City's Customer Service Request (CSR) data base: Name, date and time of incident, contact information and statement of facts. Once all information has been received, the Customer Service Unit then forwards the complaint to the Office of Contract Compliance for processing and monitoring.

5.2 Internal Complaint Processing

5.2 A-Complaint Investigation

1. The Office of Contract Compliance shall receive all complaints and provide assistance to complainants, including those persons with disabilities or who are limited in their ability to communicate in English.
2. In instances where additional information is needed for assessment or investigation of the complaint, the Office of Contract Compliance shall contact the complainant in writing within 15 working days. The Office of Contract Compliance shall inform each complainant that failure to provide the requested information by a date specified in writing may result in the administrative closure of the complaint.
3. The Office of Contract Compliance shall investigate the complaint and prepare a draft written response subject to review by the Director. If appropriate, the Office of Contract Compliance may administratively close the complaint for lack of jurisdiction or other matters.

5.2 B-Acknowledgement of the Complaint

The Office of Contract Compliance shall send a final written response to the complainant and advise the complainant of his or her right to file a complaint externally. The Office of Contract Compliance shall respond to Title VI complaints within 60 days of its receipts of such complaints.

5.3 External Redress

In addition to the complaint process at DDOT, a complainant may file a Title VI complaint with the U.S. Department of Transportation, 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.

5.4 Freedom from Reprisal or Interference

Reprisal against or interference with a complainant's rights to file a Title VI complaint, testify, assist or participate in any manner in an investigation constitutes a violation of DDOT's Title VI Program. Any DDOT employee found seeking reprisals for anyone filing a Title VI complaint may be subject to termination from DDOT's employment. Other legal actions are determined based on local, state and federal laws.

6.0 Title VI Training

The Office of Contract Compliance shall provide Title VI Training to all employees.

7.0 Monitoring and Reporting

The Office of Contract Compliance shall monitor the implementation of the Title VI Complaint Procedure and shall develop reports of alleged Title VI complaints and the disposition of such complaints. The Director shall also receive a copy of the report to aid in monitoring legal issues involving Title VI complaints. The Office of Contract Compliance shall also ensure that the public is made aware of the avenue for filing Title VI complaints through DDOT's website, throughout the facility and notices on DDOT's revenue vehicles.

Appendix B - 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 DDOT 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 DDOT's 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 C - Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the DDOT 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 its transit services on the basis of race, color, or national origin, as protected by Title VI and the Federal Transit Administration's (FTA) Circular 4702.1.A.

Your signature

Print your name

Date



Appendix D - TITLE VI COMPLAINT FORM

Detroit Department of Transportation Office of Contract Compliance

The Detroit Department of Transportation (DDOT) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator by calling (313) 833-7695. The completed form must be returned to the Detroit Department of Transportation, 1301 E. Warren Ave., Detroit, MI 48207.

| | |
|---|-----------------------------------|
| <i>Your Name:</i> | <i>Phone:</i> |
| <i>Street Address:</i> | <i>Alternate Phone:</i> |
| | <i>City, State & ZIP Code</i> |
| <i>Person(s) discriminated against</i> | |
| <i>Street Address, City, State & ZIP Code</i> | |

Which of the following best describes the reason for the alleged discrimination that took place (Please Check one)

Date of the Incident: _____

- Race
- Color
- National Origin (including Limited English Proficiency)

Please describe the alleged discrimination incident. Provide the names and title of all DDOT employees involved if available. Please explain what happened and whom you believe is responsible. Please use an additional page if additional space is required.

Appendix D - TITLE VI COMPLAINT FORM

Detroit Department of Transportation Office of Contract Compliance

(Additional Sheet - for additional space feel free to use the back of this form)

Have you filed a complaint with any other federal, state, or local agencies: (Check one)

Yes No

Agency: _____ Contact Name: _____

Street Address City, State Zip Code Phone: _____

Agency: _____ Contact Name: _____

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature _____ Date _____

| | |
|----------------|--------------|
| Date received: | Received by: |
|----------------|--------------|

APPENDIX E - 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 Detroit Department of Transportation (DDOT) 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 _____
_____, or write to me at 1301 E. Warren, Detroit, MI 48207,
Attention: Title VI Coordinator

Sincerely,

(Add Coordinator's name)
Title VI Coordinator

APPENDIX F - 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 Detroit Department of Transportation 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,

(Add Coordinator's name)
Title VI Coordinator

APPENDIX G - 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 Detroit Department of Transportation (DDOT) 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 have 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.

DDOT 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 DDOT; and/or 2) file a complaint externally with the U.S. Department of Transportation, 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,

(Add Coordinator's name)
Title VI Coordinator

APPENDIX H - Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

“The City of Detroit Department of Transportation operates its program without regard to race, color, and national origin in accordance with Title VI of the Civil Right Act. Persons who believe they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Detroit Department of Transportation.

For more information on the City of Detroit Department of Transportation’s civil rights program, the obligations, and procedures to file a complaint, call 313-933-1300, email DDOTtitle6@detroitmi.gov; visit our administrative office at 1301 East Warren Avenue, Detroit, Michigan 48207 or our website at www.RideDetroitTransit.com

If information is needed in another language contact, 1-800-883-7057.”