

## **Battle Creek Transit Title VI Plan**

Agency Name: Battle Creek Transit (BCT)

Effective Date: November, 2022

### **Plan Statement**

In compliance with Title VI of the Civil Rights Act of 1964, BCT operates all of its programs and provides public transportation services without regard to race, color, or national origin.

### **Title VI Coordinator Contact Information**

Battle Creek Transit, Attn: Transit Director, 339 W Michigan Avenue, Battle Creek, MI 49037

### **Title VI Information Dissemination**

BCT 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 the Federal Transit Administration (FTA) Circular 4702.1B. As a department of the City of Battle Creek, BCT must also comply with non-discrimination policies promulgated by the City that deal with employment issues.

BCT has a published notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint (Appendix B & C). This notice is displayed in BCT's revenue vehicles, administrative offices, and our downtown Bus Transfer shelters. The notice is also posted on BCT's website.

All employees are provided a copy of the Title VI Plan upon hire and/or update of the Title VI plan and are required to sign the Acknowledgement of Receipt (Appendix A).

### **Title VI Complaint Procedures**

Complaints for Title VI issues will be directed to the BCT Director (Appendix C).

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Battle Creek, "Battle Creek Transit" (hereinafter referred to as "BCT") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (Appendix D). The City of Battle Creek's Transit Department investigates complaints received no more than 180 days after the alleged incident. BCT will process complaints that are complete.

Once the complaint is received, BCT will review it to determine if our office has jurisdiction. Within 7 days of receipt of the complaint, BCT will mail an acknowledgement letter to the complainant informing them whether the complaint will be investigated by our office (Appendix E).

BCT will commence an investigation into the complaint within 7 days of the receipt of the complaint. If more information is needed to resolve the case, then BCT may contact the complainant. The complainant has 10 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 the 10 business days, then BCT can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case. BCT will make every effort to respond back to the complainant in writing within 40 days of the receipt of the original complaint, if not sooner, as provided below.

After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter (Appendix F) or a letter of finding (LOF) (Appendix G). 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, they have 14 calendar days after the date of the letter or the LOF to do so.

### **Title VI Investigations, Complaints, or Lawsuits**

BCT maintains a list of all Title VI investigations, complaints, and/or lawsuits and results of each (Appendix H).

### **Public Participation and Community Outreach**

As an agency, BCT has made, or is making, the following public outreach efforts:

- Meetings of its advisory committees, consisting of persons with disabilities, senior citizens, low-income persons, and minorities, are routinely scheduled and noticed and open to the public with a public comment period provided.
- BCT continues to improve the accessibility of transit service information to minority populations and limited English proficient persons within our community. In furtherance of that effort, BCT provides all schedules and route information in Spanish.

- Opportunities for public hearings are provided to citizens to offer their input on proposed service changes, fare increases, and Federal and State applications.
- BCT participates at the Michigan Department of Transportation's (MDOT) annual DBE Conference and Outreach.
- Opportunities for public participation through attendance and public comments at BCT board meetings are posted via public notice at our bus shelters at the Transportation Center, our Parks & Recreation Department main desk, City of Battle Creek City Hall, in Transit's main office, and on BCT's Facebook page and website.
- Opportunity for public comments are provided with each Federal and State application for capital and/or operating assistance via publicized 30-day public comment period; notices in various publications; and a public hearing period with public comment during City Commission meetings.

### **Limited English Proficiency (LEP) Plan**

BCT has developed this Limited English Proficiency (LEP) plan to help identify reasonable steps to provide language assistance for LEP persons seeking access to public transportation services as required by Executive Order 13166. An LEP person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan will identify procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, notification to LEP persons that assistance is available, and information for future plan updates.

In developing its plan, BCT used the requisite "four-factor" analysis to determine the extent of its obligation to provide LEP services. The LEP four-factor analysis considers the following:

1. The number or proportion of LEP persons eligible in the public transportation system's service area who may be served or are likely to encounter a public transportation program, activity, or service;
2. The frequency with which LEP persons come in contact with BCT's services;
3. The nature and importance of the program, activity, or service provided by BCT to the community; and
4. The resources available to BCT and overall cost to provide LEP assistance.

## **Four-Factor Analysis**

### **1. The number or proportion of LEP persons eligible in the public transportation system's service area who may be served or likely to encounter a public transportation program, activity, or service.**

BCT examined 2020 Census data and determined that approximately 5,113 people within the Battle Creek urbanized area spoke a language other than English. 1,934 indicated that they spoke English less than “very well”. These 1,934 persons, however, represented roughly 4% of the total urbanized area population five years and older.

The Spanish language comprised the largest non-English speaking language group in the Battle Creek urbanized area. There were 2,520 (5.3%) persons identified as speaking Spanish. Of this group, 828 persons indicated that they spoke English less than “very well”.

The second largest group of non-English speaking language was the Asian and Pacific Island languages. There were 1,485 (3.1%) identified in this category. Of this combined group, 808 (54.4%) persons indicated they spoke English less than “very well”.

### **2. The frequency with which LEP persons come in contact with BCT's services.**

BCT has not formally assessed the frequency with which LEP persons have or could possibly come in contact with a public transportation program, activity, or service. Rider surveys have been conducted periodically in the past, but have not included questions relating to a person's ethnicity. Transportation staff (drivers and dispatchers) have reported very little contact with LEP persons in recent years. BCT estimates that less than five (5%) of the residents in the Battle Creek urbanized area use public transportation. It is unknown at this time how many LEP persons may be regular or infrequent users of public transportation in Battle Creek.

### **3. The nature and importance of the program, activity, or service provided by BCT to the community.**

The fixed route and demand-response services provided by BCT are important to persons living in the Battle Creek Urbanized Area, including the limited LEP community. BCT provides vital mobility and independence to persons who cannot drive and/or cannot afford a personal automobile.

#### **4. The resources available to BCT and the overall costs to provide LEP assistance.**

BCT utilizes its available resources that could be used in providing LEP assistance. This includes identifying bilingual City staff that could assist with translation services, identifying which documents would be the most valuable to be translated when warranted by the need, inventorying organizations that BCT could partner with for outreach and translation services, and providing the appropriate level of staff training.

#### **Department of Transportation (DOT) Guidelines**

The four-factor analysis helps to determine the “mix” of LEP services required. There are two main ways to provide language services:

- (a) **Oral** (Interpretation) either in person or via telephone interpretation services; and
- (b) **Written** (Translation), ranging from translation of an entire document to translation of a short description of the document

Some language services should be made available on an expedited basis, while in others the LEP person may be referred to another office for language assistance. Regardless of the methods(s) chosen, quality and accuracy of any language service is critical.

**Oral (Interpretation)** is the act of listening to something in one language and orally translating it into another language. Interpreters should demonstrate proficiency in and the ability to communicate information accurately in both English and in the other language; have knowledge in both languages and of any specialized terms or concepts peculiar to the public transportation program.

**Written (Translation)** is the replacement of a written text from one language into an equivalent written text in another language. The extent of a recipient’s obligation to provide written translations of documents is determined on a case-by-case basis, looking at the totality of the circumstance in light of the four-factor analysis.

*Safe Harbor: To help ensure with greater certainty that recipients comply with their obligations to provide written translations in languages other than English, Paragraphs (a) and (b) below outline the circumstances that can provide a “safe harbor” for recipients. That means, when a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with written-translation obligations under Title VI.*

*The following will be considered strong evidence of compliance with the recipient's written-translation obligations:*

- (a) The DOT recipient provides written translation of vital documents for each LEP language group that constitutes 5% or 1,000, whichever is less of the population of persons eligible to be served or likely to be effected or encountered. Translation of other documents, if needed, can be provided orally.*
- (b) If there are fewer than 50 persons in a language group that reaches the 5% trigger in (a), the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

The Safe Harbor provisions apply to the translation of written documents. Besides accounting for LEP population figures, a decision to provide written translation of materials must also be based on a cost/benefit analysis, taking into account the level of contact that a transit system has with LEP persons, as well as the potential costs associated with providing translated materials.

## **BCT LEP PLAN**

Based upon the four-factor analysis above, and in consideration of the Department of Justice (DOJ) guidance, BCT has developed the following plan to improve the accessibility of public transportation services in the Battle Creek Urbanized Area to the Spanish-speaking community. BCT recognizes the significant growth of the Hispanic population that has taken place in the Battle Creek community in the past 10 years. As such, BCT believes that it is important to provide written transit service information to those LEP persons in the Hispanic community to better enable them to utilize public transportation services.

### **Identification of LEP Persons Needing Assistance**

BCT recognizes that the most likely LEP group to be encountered in the Battle Creek urbanized area is the Spanish-speaking population. As such, BCT will undertake the following activities to help identify LEP persons needing language assistance:

- Work with community organizations that interact with Spanish-speaking LEP persons.
- Keep records of interactions with members of the public at Transit meetings. The language of any LEP person in attendance can be included as part of the record, helping to determine future LEP improvements.

- Have the Census Bureau's "I Speak Cards" at Transit public meetings and BCT's offices. While BCT staff may not be able to provide translation assistance, the cards are a tool to identify language needs at future meetings and staff interaction with customers.
- Encourage drivers, dispatchers, and other front line employees to inform supervisors of any difficulties or suggestions regarding their interaction(s) with LEP persons.

### **Language Assistance Measures**

BCT will assess available resources that could be used for providing LEP assistance. This may include:

- Printing service and schedule information, i.e. bus schedules, rider's guide, in Spanish
- Identify community organizations that could partner with BCT for outreach and translation efforts
- Using "I Speak" cards at Transit public meetings and at BCT offices
- Utilizing bilingual staff when appropriate and available to assist with translation needs
- Providing service information in languages other than English on BCT's website

### **Staff Training**

BCT staff will be provided with the LEP Plan and educated on procedures to follow. This information will also be part of BCT's staff orientation process for new employees. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities
- Language assistance services offered by BCT
- Documentation of language assistance requests
- Procedures for handling Title VI and/or LEP complaints

### **Providing Notice to LEP Persons**

At this time, BCT does not have formal outreach strategies to inform LEP persons of available language assistance services. Census data indicates the primary LEP population to be Hispanic in the Battle Creek urbanized area. BCT may utilize the following for notifying Hispanic LEP persons:

- Signs will be posted in customer service areas and on buses
- Staff will contact community organizations that work with Spanish-speaking LEP persons to inform them of public transportation services

- Key printed materials, including bus schedules and maps, will be translated into Spanish and made available at the City's Transportation Center, BCT's offices, and on board buses
- Post a notice of language assistance services on BCT's website
- Language assistance may be provided in other languages if warranted by the LEP population in the area and the costs of providing language assistance

### **Monitoring & Updating LEP Plan**

This plan is designed to be flexible and one that can be easily updated as circumstances and the need by LEP persons for language assistance changes. Periodic monitoring of language assistance measures that could be implemented will help BCT to determine if assistance is being provided in the best manner. At a minimum, each LEP Plan update should examine components such as:

- How many LEP persons utilize public transit services?
- Were their transportation needs met?
- What is the LEP population in BCT's service area?
- Has there been a change in the types of languages where translation services are needed?
- Have BCT's available resources, such as technology, staff, and financial costs changed?

BCT will update the LEP Plan every three years as part of its overall Title VI Plan update requirements. An integral component of updating the LEP Plan will be consulting with community organizations representing Hispanic LEP persons. BCT will also obtain feedback from staff to assess their interactions with LEP persons and determine whether changes to the LEP Plan are warranted. This plan was last reviewed and updated in November, 2022 and will be updated in three years using the current year ACS data. BCT will reassess whether new documents, programs, services, or activities need to be made accessible for LEP persons, and provide notice of any changes.

### **Dissemination of BCT's LEP Plan**

BCT's LEP Plan will be made available to the public in a number of ways.

- Posted on BCT's website
- On file at BCT's administrative offices
- Provided to community organizations that work with the Spanish-speaking community
- Provided to individuals upon request, including a translated version if needed



Any questions or comments regarding this plan should be directed to BCT's Title VI Coordinator:

Transit Director  
Battle Creek Transit  
339 West Michigan Avenue  
Battle Creek, MI 49037

Our LEP and Title VI policy are also available on our website at <http://www.battlecreekmi.gov/transit>

### **Transit-Related, Non-Elected Boards**

Battle Creek has one transit-related, non-elected Local Advisory Council (LAC) and one transit-related, non-elected Local Coordination Committee (LCC). Members are appointed by the Battle Creek City Commission. Memberships on both currently meet the minimum number of members as provided in the by-laws of both boards. If the membership of either committee drops below the established minimum number of members, BCT will encourage committee members to reach out within their community and other organizational affiliations for new membership seeking more racial diversity in new appointments. Additionally, BCT will reach out to the general public through various newspaper advertisements and correspondence with local minority churches and related groups.

<b>Race</b>	<b>LAC</b>	<b>LCC</b>
Caucasian	3	7
African American	1	1
Latino	0	0
Asian American	0	0

### **Sub-recipients**

Battle Creek does not have any sub-recipients as it relates to Federal financial assistance.

### **Facility Improvements**

BCT has not constructed any vehicle storage, maintenance, or operation center-type facilities since our last approved submission, however, should construction or improvements occur a Title VI Equity Analysis will be conducted.

### **System Wide Standards and Policies**

BCT has adopted system-wide service standards for its fixed route and demand-response services. These standards – summarized below – were developed and

implemented to better help BCT in its goal of achieving equity among all transit customers in service design and operations decisions.

## 1. Vehicle Load Standards

BCT does not currently operate additional transportation modes (express, B.R.T., van pool, etc.) aside from its hourly fixed-route and demand-response services. Factors used to determine maximum load factors include the following:

- Current and expected fixed route ridership counts
- Expected standing time during the hourly fixed route headways
- The number of passengers entry/exit doors available per vehicle category
- Internal movement for boarding/alighting passengers, particularly with single-door vehicles

For BCT, the average of all loads during peak or off-peak operation should not exceed the vehicles' achievable capacities, which are: 33 passengers for two 30' Gillig Low Floor buses, 47 passengers for eight 35' Gillig Low Floor buses, 50 passengers for two 40' Gillig Low Floor buses.

This data is additionally expressed in tabular format below:

<b>Fixed Route Vehicle Type</b>	<b>Seated</b>	<b>Standing</b>	<b>Total</b>	<b>Maximum Load Factor</b>
30' Gillig, Low Floor, DD	23	10	33	1.43
35' Gillig, Low Floor, DD	32	10	47	1.46
40' Gillig, Low Floor, DD	40	10	50	1.25

Note: SD = Single Door DD = Double Door

## 2. Vehicle Headway Standards

For BCT, weekday service operates on eight (8) fixed routes. Three (3) of these routes operate every 60 minutes (50-55 minutes on-route, 5-10 minutes transfer time), and five (5) of these routes operate every 30 minutes (approximately 23-25 minutes on the route, 5-10 minutes transfer time). Weekday service begins at 5:15 a.m. and continues until 6:45 p.m. Saturday service operates on eight (8) fixed routes. Four (4) of these routes operate every 60 minutes (50-55 minutes on-route, 5-10 minutes transfer time), and four (4) of these routes operate every 30 minutes (approximately 23-25 minutes on the route, 5-10 minutes transfer time). Saturday service begins at 9:15 a.m. and continues until 5:15 p.m.

Fixed route planning and scheduling involves consideration of a number of factors, including but not limited to: transit/pedestrian friendly streets, density of transit-dependent population and activities, and the relationship to the BCT ridership study.

### **3. On-time Performance**

In keeping with industry standards, BCT considers a fixed route vehicle on time if it arrives at a bus stop no more than one (1) minute early and departs no more than five (5) minutes late. The on-time performance definition for demand-response service is the arrival of the vehicle for pickup within the pre-arranged 30-minute window to time.

The on-time performance rate for BCT fixed routes is tracked by the number of complaints. We estimate during optimal driving conditions, fixed route on-time performance is 90% or better. Scheduling software allows BCT to record, monitor, and tabulate on-time demand-response performance. BCT demand-response service is 90% or better.

### **4. Service Availability**

BCT is the public transportation provider for the Battle Creek Urbanized Area. Its service area includes the cities of Battle Creek and Springfield, and the townships of Bedford, Emmett, and Pennfield. BCT's service area is approximately 75 square miles with a population of nearly 80,000 people. BCT operates eight (8) bus routes and complimentary ADA paratransit service as well as demand response service for senior citizens, persons with disabilities, and others.

Battle Creek is a relatively low-density community with an average of approximately 1,200 people per square mile. Transit service design standards have been established using population density as a criterion. This is not to suggest that these standards are set in stone. Consideration was also given to generators, employment concentrations, and other factors when designing transit services.

A review of Battle Creek demographics, major destinations, travel patterns and budget constraints indicate that a radial hub and spoke system is currently the most effective. This is due to 1) the geography of the community; 2) the relative low densities beyond the urban core; and, 3) the dispersed location of major generators. Future plans include transition to bidirectional routes on major corridors.

## **Service Policies – Vehicle Assignment & Transit Amenities**

### **1. Transit Amenities**

BCT utilizes the following criteria for placement or installation of transit amenities:

- Availability of funding from Federal, State, or local government, or through partnerships with the public
- Number of passengers using a bus stop, or expected to benefit from the enhancement
- Community input or suggestion
- Proximity to commercial, medical, or residential areas, or existing, accessible sidewalks
- Proximity to inbound/outbound portions of a route, or transfer points to other fixed routes
- Space or property availability for amenity construction—whether within the public right-of-way or through private property legal agreements
- The physical suitability of placement
- Overall safety and ease of accessibility

BCT believes the most successful public transit improvements are those that fulfill an important community need. Providing an amenity that is in demand by passengers can lead to successful implementation. It remains important as well to consider potential passengers and the amenities that are important to them.

Additionally, in the planning and placement of transit amenities, careful consideration and review will always be followed to ensure that all citizens receive equal consideration and experience full participation and benefit without regard to minority and/or low income status.

### **2. Vehicle Assignment**

BCT has guidelines in place regarding the assignment of buses to its fixed routes. As a small urban transit system, daily service-vehicle deployments are made from one centrally-located operations and bus storage facility. Therefore, the assignment and distribution of the vehicle fleet among dispersed locations is not warranted. All service vehicles provide similar passenger accommodations and amenities—including wheelchair ramps and air-conditioning. All of our fixed route fleet is low-floor buses, and all are double door buses. Vehicle assignments are based on route ridership. This philosophy is implemented as much as possible however due to our small fleet size and the required low spare ratio, all of our vehicles are rotated through all routes based on availability due to maintenance requirements.

## **Employee Acknowledgement of Receipt of Title VI Plan**

Appendix A
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I have reviewed and received a copy of Battle Creek Transit's:

- Civil Rights Title VI policy
- Limited English Proficiency (LEP) policy
- Title VI Complaint procedures process

I have had an opportunity to discuss and ask questions on the information covered.

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Printed Name

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Signature

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Date

**Public Notice of Rights Under Title VI**  
**The City of Battle Creek, Michigan**

Appendix B

- In compliance with Title VI of the Civil Rights Act of 1964, Battle Creek Transit (BCT) operates all of its programs and provides public transportation services without regard to race, color, or national origin. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a written complaint with the City of Battle Creek.
- For more information on the City of Battle Creek's civil rights program, and the procedures to file a complaint, contact BCT Customer Service at 269-966-3474; email to [mravis@battlecreekmi.gov](mailto:mravis@battlecreekmi.gov); or visit our administrative office at 339 W Michigan Avenue, Battle Creek, MI 49037. For more information, visit our website at: <http://www.battlecreekmi.gov/transit>
- 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, 5<sup>th</sup> Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.
- If information is needed in another language, please contact 269-966-3474.
- Si se necesita información en otro idioma, por favor llame 269-966-3474.

NOTE: This Public Notice is posted at the following location: BCT's revenue vehicles; BCT administrative offices; and downtown Bus Transfer shelters. The notice is also posted on BCT's website.

## **City of Battle Creek**

### **Title VI Complaint Procedure**

Appendix C

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Battle Creek's, "Battle Creek Transit" (hereinafter referred to as "BCT") may file a Title VI complaint by completing and submitting the agency's Title VI Complain Form. The City of Battle Creek's Transit Department investigates complaints received no more than 180 days after the alleged incident. BCT will process complaints that are complete.

Once the complaint is received, BCT will review it to determine if our office has jurisdiction. Within 7 days of receipt of the complaint, BCT will mail an acknowledgement letter to the complainant informing them whether the complaint will be investigated by our office.

BCT will commence an investigation into the complaint within 7 days of the receipt of the complaint. If more information is needed to resolve the case, then BCT may contact the complainant. The complainant has 10 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 the 10 business days, then BCT can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case. BCT will make every effort to respond back to the complainant in writing within 40 days of the receipt of the original complaint, if not sooner, as provided below.

After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegation and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegation 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, they have 14 calendar days after the date of the letter or the LOF to do so.

In addition to the above complaint procedure, 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. The complaint must be filed within 180 days of the alleged discrimination.

If information is needed in another language, then contact 269-966-3474.  
Si se necesita información en otro idioma, por favor llame 269-966-3474.

**Battle Creek Transit (BCT)**  
**Title VI Complaint Form**

Appendix D

The following information is necessary to assist us in processing and investigating your complaint. If you require assistance in completing this form, then please contact the Title VI Coordinator at (269) 966-3588.

**Section I:**

Name: \_\_\_\_\_ Telephone No.: (\_\_\_\_) \_\_\_\_\_  
Address: \_\_\_\_\_ Alt. Tele. No.: (\_\_\_\_) \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Electronic Mail (email) address: \_\_\_\_\_

**Section II:**

Are you filing this complaint on your own behalf? ☐ Yes\* ☐ No

\*If you answered "yes" to this question, then skip to Section III.

If not, then 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:**

Name of the agency complaint is against: \_\_\_\_\_  
Contact person: \_\_\_\_\_  
Title: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

**Section IV**

Which of the following best describes the reason you believe the alleged discrimination was based on? (Check all that apply)

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination (month/day/year): \_\_\_\_\_

Witnesses to alleged discrimination:

Name: \_\_\_\_\_ Contact Info.: \_\_\_\_\_  
Name: \_\_\_\_\_ Contact Info.: \_\_\_\_\_



Explain as clearly as possible what happened and how you believe you were discriminated against. Describe all persons who were involved, and provide the names and title of all BCT employees involved, if possible. Be sure to include the names and contact information of any witnesses. If more space is needed, then please use the back of the form.

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**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 ☐ State court ☐ Local agency

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

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint. I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature and date required below:

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

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

**Title VI Coordinator  
Battle Creek Transit  
339 West Michigan Avenue  
Battle Creek, MI 49037-2313**

Date Received: _____
Received By: _____

## Sample Letter of Acknowledgement

Appendix E
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Today's date

Ms. Jane Doe  
1234 Main Street  
Battle Creek, MI 49015

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Battle Creek Transit alleging

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An investigation will begin shortly. If you have additional information you wish to convey, or questions regarding this matter, please feel free to contact me directly at (269) 966-3588, my mail at Battle Creek Transit, 339 W. Michigan Avenue, Battle Creek, MI 49037, or via email at [mravis@battlecreekmi.gov](mailto:mravis@battlecreekmi.gov).

Sincerely,

Mallory Avis  
Title VI Coordinator &  
Transit Director

## Sample Letter of Closure

Appendix F

Today's date

Ms. Jane Doe  
1234 Main Street  
Battle Creek, MI 49015

Dear Ms. Doe:

This matter referenced in your complaint of \_\_\_\_\_ (date) against Battle Creek Transit alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Acts 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.

Battle Creek Transit has analyzed the materials and facts pertaining to your case for evidence of Battle Creek Transit'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 14 calendar days of receipt of this final written decision from Battle Creek Transit, 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, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue SE  
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance in the future, do not hesitate to contact me at (269) 966-3588, by mail at Battle Creek Transit, 339 W. Michigan Avenue, Battle Creek, MI 49037, or via email at [mravis@battlecreekmi.gov](mailto:mravis@battlecreekmi.gov).

Sincerely,

Mallory Avis  
Title VI Coordinator &  
Transit Director

## Sample Letter of Finding (Substantiated)

Appendix G
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Today's date

Ms. Jane Doe  
1234 Main Street  
Battle Creek, MI 49015

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against Battle Creek Transit 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 service should be needed during the administrative hearing process.

Sincerely,

Mallory Avis  
Title VI Coordinator &  
Transit Director

## List of Complaints, Investigations and Lawsuits

Appendix H

BCT has not received any complaints since the last Title VI update therefore there have been no investigations completed and no lawsuits.

	<u><b>Date</b></u> M/D/YY	<u><b>Summary</b></u> i.e. Race, Color, or National Origin	<u><b>Status</b></u>	<u><b>Action Taken</b></u>
<b>Complaints:</b>				
<b>Investigations:</b>				
<b>Lawsuits:</b>				