

Touchstone Services, Inc.

Title VI Program

Updated: June 7, 2017

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 sub-recipients for compliance with Title VI, and a schedule of sub-recipient 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
Touchstone Services, Inc.**

Touchstone Services, Inc. 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 Touchstone Services, Inc.

For more information on Blue Water Area Transportation civil rights program, and the procedures to file a complaint, contact Touchstone Services, Inc., Lynn Vinson, 512 Quay Street, Port Huron, MI 48060.

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 Touchstone Services, Inc., 512 Quay Street, Port Huron, MI 48060.

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

1. On all Touchstone Services, Inc. revenue service vehicles
2. On Touchstone Services, Inc.'s website located at touchstoneservicesinc.org.
3. At the Touchstone Services, Inc. administrative offices.

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

**Touchstone Services, Inc.
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 Touchstone Services, Inc. (hereinafter referred to as “the Agency”) may file a Title VI complaint by completing and submitting the Agency’s Title VI Complaint Form. Touchstone Services, Inc. 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

There have been no complaints, investigations or lawsuits related to Title VI in the past three years.

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

A representative from BWATC serves on the Advisory Board of the Blue Water Clubhouse.

Touchstone Services, Inc. takes an active role in the community through participation in many community events and the operation of a non-profit gift shop in downtown Port Huron. This shop employs individuals with various barriers to employment and provides fund-raising opportunities for other non-profit agencies in the county. Touchstone services, Inc. is a member of the St. Clair County United Way.

In addition, Touchstone Services, Inc benefits from the outreach efforts of BWATC, as listed below:

- 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. Performed a Four Factor LEP Analysis that included a great deal of outreach – see Attachment B.
- c. BWATC has contacted the local Hispanic Council since our last submission to ensure that their needs were being met. LEP Spanish speaking persons, at 0.5% of our service population, or 632 people, form the largest block of LEP in our area that has community representation. The Hispanic Council has explained to us that all of the LEP Spanish speaking persons' current needs are being met, and if something changes they will contact us and work together to form a solution.
- d. BWATC has worked directly with nine not-for-profit agencies in the past three years that deal mainly with low-income and minority issues. We incorporated them into our 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 qualified for our JARC voucher program. By working with these agencies on a day to day basis, a great deal of transportation information was disseminated throughout the community.
- e. BWATC posted our *Title VI Notice to the Public* in readily accessible locations on all of our revenue vehicles in order to ensure that our drivers understand our obligations and passengers understand their rights.
- f. BWATC published our *Title VI Notice to the Public* in newspapers with county wide circulation as part of our annual application for operating assistance from the State of Michigan.
- g. BWATC has included our *Title VI Notice to the Public* on our website as well as this program.
- h. BWATC has performed an analysis of Public Participation since our last submission and public participation has been strong. We 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 66 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

Touchstone Services, Inc. relies on BWATC's 4 factor LEP analysis. Touchstone maintains a copy of BWATC's LEP plan. Additionally, agency staff are inserviced on LEP at time of hire. Each program location has a language poster to help staff identify language needs and preferences of any individuals that enter the building and a list of local interpreters, should those services be required, is also available.

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

The Advisory Board for our Clubhouse program is made up of program participants and members of the business and human service community. The current roster is as follows:

B. Lenz	BWATC	white, female
(vacant)	PH Housing	
(vacant)	CMH	
(vacant)	MRS	
L. Deline	Business/Touchstone	white, female
L. Secorey	Family member	white, female
S. Smith	Vocational Services/Touchstone	white, female
T. Ferres	Attorney	white, female
M. Edwards	Clubhouse/Touchstone	African American, female
T. Regan	Clubhouse/Touchstone	white, male
S. Seglarek	RESA	white, male
D. Fieldler	Banker	white, male
S. Redfield	Clubhouse/Touchstone	white, female
J. Green	Banker	white, female
L. Vinson	Touchstone	white, female

Touchstone Services, Inc. encourages participation of individuals receiving services, family members, and interested community members to participate on the Advisory Board. Invitations are made to various businesses and agencies to offer interested employees the opportunity to participate on the Advisory Board.

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

N/A

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.

N/A

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

A copy of Touchstone Service, Inc. Board meeting minutes indicating review and approval of the Title VI Program is attached.

Section 11. Service Standards and Policies

N/A for Demand Response service.

