

**Houghton Motor Transit  
Title VI Plan  
Revised November 2020**

**Agency Name:** Houghton Motor Transit

**Date Adopted:**

**I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, gender, age, color, sexual orientation, 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, gender, age, color, sexual orientation, 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 *Houghton Motor Transit* (HMT) 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, gender, age, sexual orientation, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

This plan was developed to guide the *Houghton Motor Transit* in its administration and management of Title VI-related activities.

**Title VI Coordinator Contact information**

Houghton Motor Transit  
Jodi Reynolds, Director  
616 Sheldon Avenue  
Houghton, MI 49931  
Phone: 906-482-1700  
Fax: 906-483-5303  
Email: [transitdirector@cityofhoughton.com](mailto:transitdirector@cityofhoughton.com)

**II. Title VI Information Dissemination**

Title VI information posters (See Appendix B) shall be prominently and publicly displayed in the *Houghton Motor Transit* facility and on their revenue vehicles. The name of the Title VI coordinator is available on the *City of Houghton* website, at [cityofhoughton.com](http://cityofhoughton.com). Additional information relating to nondiscrimination obligation can be obtained from the *Houghton Motor Transit* Title VI Coordinator.

Title VI information shall be disseminated to *Houghton Motor Transit* employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the *Houghton Motor Transit's* policy statement, and of their Title VI responsibilities in their daily work and duties. All employees shall be provided a

copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (Appendix A).

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Houghton Motor Transit's expectations to perform their duties accordingly.

### **III. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from Houghton Motor Transit 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 will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of Houghton Motor Transit 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.

### **V. Title VI Complaint Procedures**

#### **How to file a Title VI Complaint?**

The complainant may 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:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with the Houghton Motor Transit at the following address:

*Houghton Motor Transit  
PO Box 606  
616 Shelden Avenue  
Houghton, MI 49931*

NOTE: The Houghton Motor Transit 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.

**What happens to the complaint after it is submitted?**

All complaints alleging discrimination based on race, gender, age, color, sexual orientation, or national origin in a service or benefit provided by the Houghton Motor Transit will be directly addressed by the Houghton Motor Transit. The Houghton Motor Transit 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 Houghton Motor Transit 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.

**How will the complainant be notified of the outcome of the complaint?**

The Houghton Motor Transit will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), 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 the Houghton Motor Transit, 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.

*Once sufficient information for investigating the complaint is received by the Houghton Motor Transit, a written response will be drafted subject to review by the transit's attorney. If appropriate, the Houghton Motor Transit's attorney may administratively close the complaint. In this case, the Houghton Motor Transit will notify the complainant of the action as soon as possible.*

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

To date, there have been no investigations, lawsuits, or complaints against the Houghton Motor Transit.

## **VI. Limited English Proficiency (LEP) Plan Introduction**

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and Rights Act of 1964, 42 U.S.C. 2000D, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

### **Executive Order 13166**

Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to requirements of Title VI to publish guidance of its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as Houghton Motor Transit (HMT) and governments, private and non-profit entities, and subrecipients.

### **Plan Summary**

The HMT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to HMT services as required by Executive Order 13166. A Limited English Proficiency 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 details procedures on how to identify person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the HMT’s extent of obligation to provide LEP services, the HMT undertook a U.S. Department of Transportation four factor LEP analysis which considers the following 1) The number or proportion of LEP persons eligible in the HMT service area who maybe served or likely to encounter an HMT program, activity, or service; 2) the frequency with which LEP individuals come in contact with an HMT services; 3) the nature and importance of the program, activity or

service provided by the HMT to the LEP population; and 4) the resources available to the HMT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

**Four Factor Analysis**

**Factor I: The Proportion, Numbers and Distribution of LEP Persons**

The Census Bureau has a range for four classifications of how well people speak English. The classifications are: ‘very well,’ ‘well,’ ‘not well,’ and ‘not at all.’ For our planning purposes, we are considering people that speak English less than ‘very well’ as Limited English Proficient persons.

As seen in Table #1, the 2011-2015 American Community Survey 5-Year Estimates for the City of Houghton shows a small amount of the population that would speak English less than ‘very well.’

**Table # 1**

LANGUAGE SPOKEN AT HOME	# of Individuals	Percentage
<b>Population 5 years and over</b>	7,720	
<b>English only</b>	6,638	86.0%
<b>Language other than English</b>	1,082	14.0%
<b>Speak English less than "very well"</b>	434	40.1%
<b>Spanish</b>	105	1.4%
<b>Speak English less than "very well"</b>	0	0.0%
<b>Other Indo-European languages</b>	456	5.9%
<b>Speak English less than "very well"</b>	152	33.3%
<b>Asian and Pacific Islander languages</b>	462	6%
<b>Speak English less than "very well"</b>	282	61.0%
<b>Other languages</b>	59	.08%
<b>Speak English less than "very well"</b>	0	0%

**II. The frequency with which LEP individuals come in contact with the HMT program, activity, or service** The HMT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. Staff and drivers have had very little contact with LEP individuals.

**III. The nature and importance of the program, activity, or service provided by the HMT to LEP community** There is no large geographic concentrations\ of any one type of LEP individuals in the HMT service area. The overwhelming majority of population, 85.7% or 6,401, speak only English.

**IV. The resources available to the HMT and overall costs** The HMT assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translations service would cost on an as needed basis, which documents would be most valuable to be translated if and when the populations supports, taking an inventory of available organizations that the HMT could partner with for outreach and translation efforts, and what level of staff training is needed.

After analyzing the four factors the HMT developed a plan to assist individuals with limited English proficiency.

### **LIMITED ENGLISH PROFICIENCY PLAN OUTLINE**

#### **Identify LEP Person's who needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When HMT sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee.
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the HMT center and on the vehicles.
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

#### **Language Assistance Measures**

The HMT has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the HMT service area:

- Census Bureau's "I Speak Cards" are to be located at the Customer Service window in the Transit Center at all times.
- The HMT will work with Michigan Technological University to educate students in the use of bus transportation.
- Individuals requesting service from the HMT Transit Center may use AltaVista Babel Fish to aid in translation.

### **HMT Staff Training**

All HMT staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the HMT staff orientation process for new hires. Training topics will include:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the HMT offers;
- Use of LEP “I Speak Cards”;
- How to access AltaVista Babel Fish via the computer;
- Documentation of language assistance requests;
- How to handle the Title VI and/or LEP complaints

### **Outreach Techniques**

As part of this first draft of the HMT LEP Plan dated July 20, 2008 HMT does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that the HMT will incorporate when and/or if the need arises for LEP outreach:

- Work closely with MTU to educate and assist LEP students as needed.
- Provide assistance with available translators

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the HMT will follow the Title VI Program update schedule for the LEP Plan. The next required Title VI Program update must be forwarded to the FTA by 2020. However, major information has been updated with the 2010 Census results. Updates will not take place unless the HMT finds it necessary and crucial for an update before such time.

Each update should examine all plan components such as:

- How many LEP persons were encountered?;
- Were their needs met?;
- What is the current LEP population in HMT service area?;
- Has there been a change in the types of languages where translation services are needed?;
- Is there still a need for continued language assistance for previously identified HMT programs? Are there other programs that should be included?;
- Have the HMT/s available resources, such as technology, staff, and financial costs changed?;
- Has the HMT fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

### **Dissemination of the HMT Limited English Proficiency Plan**

The HMT includes the LEP plan on the City of Houghton website at [www.cityofhoughton.com](http://www.cityofhoughton.com)) and at the City of Houghton Office.

Any person, including social service, non-profit and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies of the plan upon request.

Any questions or comments regarding this plan should be directed to the HMT Director

Houghton Motor Transit Director  
616 Sheldon Avenue  
Houghton, MI 49931  
Phone: 906-482-1700  
Fax: 906-483-5303  
Email: [transitdirector@cityofhoughton.com](mailto:transitdirector@cityofhoughton.com)

### **VII. Community Outreach**

*Community Outreach is a requirement of Title VI. Recipients and subrecipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.*

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

*The Houghton Motor Transit has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. **Between 2017-2020** the public was invited to participate in these activities:*

*Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan). Federal transit law, as amended by Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users of 2005 (SAFETEA-LU), requires that projects selected for under the Elderly and Individuals with Disabilities Program (Section 5310), Job Access and Reverse Commute Program (Section 5316), and New Freedom Program (Section 5317) be derived from a coordinated plan. Describe your plan development process which involved the public participation.*

*Board Meetings. The Board of Directors holds monthly meetings and the public is invited to attend.*



*Public Meetings.* When new service is proposed information is disseminated to the neighborhoods affected and public meetings are scheduled.

*Travel Training Class.* The Houghton Motor Transit has developed a travel training program to reach out to community groups (senior centers, senior facilities, and the disabled community) to conduct travel training classes. Travel Training classes are ongoing as well as outreach to these populations.

*Customer Complaint Process.* Citizens may call our Guest Services Department at The City of Houghton to lodge a complaint or comment. All complaints/comments are input into a database and then distributed to the relevant manager who researches the complaint and responds back to the citizen. The Houghton Motor Transit complaint process was updated in 2007-2008.

*General Awareness and Phone Surveys.* We conduct onboard rider and general awareness surveys frequently. In 2017 a marketing study was undertaken to garner information from the public regarding their perceptions of public transportation. Origin/Destination surveys and other public surveys are developed to assist Houghton Motor Transit in gathering information to develop new routes.

*Bilingual Outreach.* The Houghton Motor Transit Guest Services group provides Spanish-speaking guests with information on public transit services in Spanish. Guest Services assistance is utilized in outreach programs and offered for programs and public meetings.

We submit to the Michigan Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

### **Safe Harbor Stipulation**

Federal law provides a “Safe Harbor” situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A “Safe Harbor” means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is non-compliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a Safe Harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as

effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient’s written translation obligations under “Safe Harbor” includes providing written translations of vital documents for each eligible 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 affected or encountered. Translation of other documents, if needed, can be provided orally.

This “Safe Harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Given the small number of LEP language group members, the City of Houghton’s budget and number of staff, it is deemed that written translations of vital documents would be so burdensome as to defeat the legitimate objectives of our programs. It is more appropriate for the City of Houghton to proceed with oral interpretation options for compliance with LEP regulations.

**Representation of Boards**

<b>Elected</b>	<b>City Council</b>		<b>Appointed</b>	<b>LAC</b>	
<b>Race</b>	<b>Male</b>	<b>Female</b>	<b>Race</b>	<b>Male</b>	<b>Female</b>
<b>White</b>	<b>6</b>	<b>1</b>	<b>White</b>	<b>1</b>	<b>2</b>

The LAC has posted in the local newspaper for openings on our board for any person to apply. We work closely with Michigan Tech University which has committees of students of different racial backgrounds which meet with the City of Houghton for various transportation issues and planning. Various local disability and low income committees also consist of members from unlimited racial backgrounds.

Yearly monitoring and assistance is provided to ensure the subrecipients comply with Title VI regulations.

**Title VI Equity Analysis:**

The Houghton Motor Transit is currently not in the process of building a facility but if a facility will be constructed in the future we will follow the requirements.

## **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 *Houghton Motor Transit* 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 *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, gender, age, color, sexual orientation, or national origin.

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

I hereby acknowledge the receipt of the *Houghton Motor Transit's* 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, gender, age, color, sexual orientation, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

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Your signature

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Print you name

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Date

**Appendix B      Notice to the Public**

**TITLE VI  
CITY OF HOUGHTON  
PUBLIC TRANSIT**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, gender, age, color, sexual orientation 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, gender, age, color, sexual orientation 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).

**City of Houghton Public Transit** 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, gender, age, color, sexual orientation or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. **If you feel you are being denied participation in or being denied benefits of the transit services provided by City of Houghton Public Transit, or otherwise being discriminated against because of your race, gender, age, color, sexual orientation, national origin, or disability, you may contact our office at:**

**Attention: Jodi Reynolds  
Title VI Coordinator  
City of Houghton Public Transit  
616 Shelden Avenue  
Houghton, MI 49931**

For more information, visit our website at [www.cityofhoughton.com](http://www.cityofhoughton.com)

**To be displayed on all transit vehicles, facilities, & bus shelters.**

**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, gender, age, color, sexual orientation, 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 and sent it to:

Provide address here

Please print clearly:

Name:

\_\_\_\_\_

Address:

\_\_\_\_\_

City, State, Zip Code:

\_\_\_\_\_

Telephone Number: \_\_\_\_\_(home) \_\_\_\_\_(cell) \_\_\_\_\_(message)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

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

Please indicate why you believe the discrimination occurred:

- \_\_\_\_\_ race or color
- \_\_\_\_\_ national origin
- \_\_\_\_\_ income
- \_\_\_\_\_ other

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

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Please list any and all witnesses' names and phone numbers:

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What type of corrective action would you like to see taken?

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Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

*Title VI Coordinator*  
*PO Box 606*  
*616 Sheldon Avenue*  
*Houghton, MI 49931*

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Your signature

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Print your name

---

Date

**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 *Houghton Motor Transit* 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 906-482-1700, or write to me at this address.

Sincerely,

Name  
Title VI Coordinator

**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 Houghton Motor 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 services should be needed during the administrative hearing process.

Sincerely,

Name  
Title VI Coordinator



**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 *Houghton Motor Transit* 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, gender, age, color, sexual orientation, or national origin in any program receiving federal financial assistance.

The *Houghton Motor Transit* 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 *Houghton Motor 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, 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,

Name  
Title VI Coordinator

