

GROWTH & OPPORTUNITY INC.

525 S. Court St.
Lapeer, MI 48446
810 664 8504 FAX 810 664 0680
Website www.go-inc.org

Policy

Title VI Plan

Agency Name: Growth & Opportunity, Inc.

Date Adopted: June 1, 2009

Date Revised: May 31, 2012

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).

Growth & Opportunity, Inc. 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 Growth & Opportunity, Inc. in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court St.
Lapeer, Michigan 48446
Phone: 810-664-8504; Ext. 307 or 310

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed at Growth & Opportunity, Inc. and in their vehicles. The name of the Title VI coordinator is available on the Growth & Opportunity, Inc. web site, at www.go-inc.org. Additional information

relating to nondiscrimination obligation can be obtained from the Growth & Opportunity, Inc. Title VI Coordinator.

Title VI information shall be disseminated to Growth & Opportunity, Inc. employees via the Employee Education form (see Appendix A) at their annual review. This form reminds employees of the Growth & Opportunity, Inc 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 Growth & Opportunity, Inc's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Employee Acknowledgement of Receipt (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Growth & Opportunity, Inc 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. Recordkeeping:

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 Growth & Opportunity, Inc Title VI Plan (employee file), 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. In order for Growth & Opportunity, Inc. to properly investigate a complaint, a complaint must be filed in writing with Growth & Opportunity, Inc at the following address:

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court St.
Lapeer, Michigan 48446

NOTE: Growth & Opportunity, Inc. 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, color or national origin in a service or benefit provided by Growth & Opportunity, Inc will be directly addressed by Growth & Opportunity, Inc. Growth & Opportunity, Inc. shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Growth & Opportunity, Inc 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?

Growth & Opportunity, Inc 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 Growth & Opportunity, Inc, 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.

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

VI. Limited English Proficiency (LEP) Plan

The four factor analysis performed by Growth & Opportunity, Inc. to determine the need for a formalized Limited English Proficiency (LEP) plan, indicates Growth & Opportunity, Inc. does not need a formal LEP plan based on current demographics and demand for language assistance. However, Growth & Opportunity, Inc. has a training program for new employees and is reviewed annually during an employee's evaluation. and an annual refresher for existing employees. This program makes employees aware that our organizations practices and procedures cannot have the effect of restricting meaningful participation in our program by an LEP person.

VII. Community Outreach

As an agency receiving federal financial assistance, Growth & Opportunity, Inc. has made the following community outreach efforts:

Growth & Opportunity, Inc. has engaged the public in its planning and decision making process by actively participating in the Local Advisory Committee for the local transportation authority, Greater Lapeer Transportation Authority (GLTA). Growth & Opportunity, Inc. participated in the Lapeer County Coordinated Public Transit-Human Service Transportation Plan workshop on May 24, 2007 and subsequent follow-up meetings.

As recipients of JARC funds, Greater Lapeer Transportation Authority (GLTA) took the lead in the effort with the cooperation of Lapeer Team Work and Growth and Opportunity Inc., both recipients of Section 5310 funding. The three agencies met and developed a participant list which was sent to the Multi-Purpose Collaborative Body to complete. On May 10, 2007, GLTA sent out a letter of invitation to everyone on this list with the Registration and Stakeholder Information Sheet attached. The workshop was held on May 24, 2007, and attended by 30 people. Participants from this list were called by two (2) volunteers from the LAC if they had not responded prior to the workshop.

Robert Schlund
Co-Administrator

Linda Franckowiak
Co-Administrator

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 Growth & Opportunity, Inc. 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 Robert Schlund or Linda Franckowiak, Growth & Opportunity, Inc. Title VI coordinators.

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 B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Growth & Opportunity, Inc. 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 in Federal Transit Administration (FTA) Circular 4702.1.A.

Employee Signature

Print name

Date

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, 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.” 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 send it to:

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court Street
Lapeer, MI 48446

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: _____

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

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

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

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court St.
Lapeer, Michigan 48446

Signature

Print name

Date

APPENDIX D Letter Acknowledging Receipt of Complaint

Date

Name
Address
City, State, Zip

Dear Name:

This letter is to acknowledge receipt of your complaint against Growth & Opportunity, Inc. 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 telephone at 810-664-8504 ext. 307 or 310 or in writing to this address.

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court St.
Lapeer, Michigan 48446

Sincerely,

Name
Title VI Coordinator

APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

Date

Name

Address.

City, State, Zip

Dear Name:

The matter referenced in your letter of _____ (date) against Growth & Opportunity, Inc. 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

Date

Name
Address.
City, State, Zip

Dear Name:

The matter referenced in your complaint dated _____ against Growth & Opportunity, Inc. 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, color, or national origin in any program receiving federal financial assistance.

Growth & Opportunity, Inc. has analyzed the materials and facts pertaining to your case for evidence of Growth & Opportunity'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) provide additional information to this office for reconsideration of your complaint within seven calendar days of receipt of this final written decision from Growth & Opportunity, Inc., 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 contact me.

Sincerely,

Name
Title VI Coordinator

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

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).

Growth & Opportunity, Inc. 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. **If you feel you are being denied participation in or being denied benefits of the transit services provided by *Growth & Opportunity, Inc.*, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Growth & Opportunity, Inc.
Title VI Coordinator
525 S. Court St.
Lapeer, Michigan 48446

For more information, visit our website at www.go-inc.org