

Curative Connections Transportation Services Title VI Plan

I. Plan Statement

Curative Connections Transportation Services is committed to ensuring that no person be excluded from participation in, be denied benefits of Transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) circular 4702.1.B. Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall on the grounds of race, color, national origin be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance (42 U.S.C. Section 200d). In addition, the Civil Rights Restoration Act of 1987 expanded the definition of terms “programs and activities” to include Federal Aid recipients, sub recipients and contractors of such programs/activities whether or not they are federally assisted.

This plan was developed as a guide for Curative Connections Transportation Services program and lists information pertaining to the administration and management of Title VI related activities:

Curative Connections Transportation Services Program Manager is authorized as the Title VI Coordinator, responsibilities of the Title VI Coordinator include but are not limited to ensuring compliance of non - discrimination and its policy by all employees/volunteers of Curative Connections Transportation Services. To ensure compliance, the Title VI Coordinator will be responsible to provide a copy of the plan to all current and new employees/volunteers. The Title VI plan will also be available in our office.

Title VI Coordinator will review all written Title VI complaints that may be received. In addition the Title VI Coordinator will maintain copies of any/all Title VI complaints, any related documentation, records of correspondence to and from complainants, and Title VI investigations. In addition the coordinator will work to ensure every effort is made to resolve complaints informally at the local level.

Transportation Services Title VI Coordinator contact Information:

Tina E Whetung
2900 Curry Ln
Green Bay, WI 54311
(920) 227-4273
twhetung@curativeconnections.org

II. Notice to the public

Title VI informational posters are publicly displayed in the Curative Connections Transportation facility – 121 Bader St.

III. Title VI Complaint Procedures

How to File a Title VI Complaint

The Transportation service offered is done so without regard to race, color, national origin in accordance with Title VI of the Civil Rights Act of 1964. If you feel you have been denied service of, excluded from participation in or subject to discrimination you have the right to file a complaint with the Title VI Coordinator. **SEE APPENDIX #1**

The complainant is advised to file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Complainant name, mailing address, phone number and information on how to best contact you (i.e., telephone number, e-mail 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 should be used to submit the complaint information. The complaint should be filed in writing with the Title VI Coordinator for Curative Connections:

SEE APPENDIX #1

Curative Connections
Transportation Services
2900 Curry Ln
Green Bay, WI 54311
Attention: Tina Whetung

Curative Connections region suggests that all complaints be sent via certified mail through the U.S. Postal Service, this is encouraged to ensure that all written correspondence can be tracked easily. In addition complaints can be submitted by facsimile or email however an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 30 days from the alleged date of the discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on the grounds of race, color, national origin that occur while receiving a service or benefit provided by Curative Connections Transportation Services will be directly addressed by the Curative Connections Transportation Services Program manager. Curative Connections Transportation Services shall make every effort to address all complaints in an expeditious and thorough manner every effort will be made to respond to Title VI complaint within 60 working days.

A letter acknowledging receipt of the complaint will be mailed to complainant within seven days of being received. Please note that a complainant's failure to provide the requested information may result in the administrative closure of the complaint. **SEE APPENDIX #2**

How will the Complainant be notified of the outcome of the complaint?

Complainant will receive a final written response letter from Curative Connections Transportation Services Title VI Coordinator. The letter from the Title VI coordinator will notify complainant whether the claim was found to be substantiated or not substantiated. Information advising complainant of their rights will be provide on letters sent out stating the claim is not substantiated. Complainant has the right to:

- 1) Appeal within seven calendar days of the receipt of the final written decision.
- 2) File a complaint externally with the U.S. Department of Transportation and/or the FTA 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**

**APPENDIX #1
TITLE VI COMPLAINT FORM**

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States 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.

If you feel you have been discriminated against, please provide the following information. It is necessary to complete the form in detail so that we may process your complaint. Mail completed forms to:

**Curative Connections – Transportation Services
2900 Curry Lane
Green Bay, WI 54311
Attention: Tina Whetung**

Section I

Name: _____ Date: _____

Address: _____

Telephone: _____ / _____

City, state, Zip Code: _____

Section II

Are you filing this complaint on your own behalf? Yes _____ No _____
If you answered “Yes” go to Section III

Name of person discriminated against, if it is not you _____

Your name _____ Telephone _____

Your relationship to the complainant _____

Please explain why the complaint is being completed by a third party _____

Please confirm that you have permission to file on this person’s behalf Yes _____ No _____

APPENDIX #1 continued

Were there any witnesses to the this incident Yes _____ No _____

Witness name & phone number _____

Witness name & phone number _____

Witness name & phone number _____

Is there any other information you would like to provide _____

Section IV

Have you previously filed a Title VI Complaint with this agency? Yes _____ No _____

Section V

Have you filed this complaint with any other federal, state or local agency or federal or state court?

Yes _____ No _____

If yes, check all that apply and list name:

() 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

Agency Name: _____

Contact Person: _____

Telephone: _____

Section VI

Name of agency/program complaint is against _____

APPENDIX #1 continued

Contact person name _____ Phone # _____

You may attach any written materials or other information that you think is relevant to your complaint

Signature & date required

Complainant Signature Date

Note: Complaint will not be accepted without signature

Curative Connections Transportation Services Title VI coordinator will investigate all complaints. At the conclusion of the investigation we will send a letter of finding to the complainant. If the investigation determines that we were not in violation of Title VI our letter will explain why we were in compliance. If it is determined that there was a violation of Title VI our letter will document the violation and the action that will be taken to become compliant.

Please send completed forms to:

Curative Connections – Transportation Services

2900 Curry Lane

Green Bay, WI 54311

Attention: Tina Whetung

APPENDIX #2

Letter Acknowledging Receipt of Complaint

Complainant Name
Complainant Address
City, State, Zip code

Dear Complainant:

This letter is to acknowledge receipt of your complaint against Curative Connections Transportation Services program.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact the office at (920) 227-4273 or by email at twhetung@curativeconnections.org or mail additional information/ comments questions to:

Curative Connections
Transportation Services
2900 Curry Lane
Green Bay, WI 54311
Attention: Tina Whetung

Sincerely,

Tina E Whetung
Program Manager Transportation Services
Curative Connections

APPENDIX #3

LETTER NOTIFYING COMPLAINANT THAT THE COMPLAINT IS SUBSTANTIATED

Complainant Name
Complainant Address
City, State, Zip code

Dear Complainant:

With regards to the Title VI violation referenced in the complaint we received on _____. Curative Connections Transportation Services Title VI coordinator has investigated the claim and came to the following conclusion.

(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 (this/these) deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program.

Sincerely,

Tina E Whetung
Program Manager Transportation Services
Curative Connections

APPENDIX #4

LETTER NOTIFYING COMPLAINANT THAT THE COMPLAINT IS NOT SUBSTANTIATED

Complainant Name
Complainant Address
City, State, Zip code

Dear Complainant:

With regards to the Title VI violation referenced in the complaint we received on _____. Curative Connections Transportation Services Title VI coordinator has investigated the claim and came to the following conclusion.

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. Curative Connections Transportation Services has reviewed the materials and facts pertaining to your case for evidence of our organizations failure to comply. Based on the information provided in your complaint we have found that there was no evidence found that any of the Title VI of the Civil Rights Act 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 the receipt of the final written decision from Curative Connections Transportation Services.
- 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA 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.

Sincerely,

Tina E Whetung
Program Manager Transportation Services
Curative Connections

List of Transit related Title VI Investigation, Complaints and Lawsuits

Subrecipient: Curative Connections Transportation Services	
Tina E Whetung	Date

_____ There has been no investigations, complaint and/or lawsuit against us during the report period

_____ There has been investigations, complaints and/or lawsuits filed against us. See list below, attached will be additional information as needed

	Date	Complainants Name & Address	Summary (Basis of complaint race, color, national origin)	Status	Action(s) Taken
Complaint					
1.					
2.					
Investigation					
1.					
2.					
Lawsuits					
1.					
2.					

Public Participation Plan

Subrecipient	Curative Connections Transportation Services	
Contact person: Tina E Whetung		Date

To promote public participation Curative Connections does the following:

- Contact local churches asking that they include transportation service information as well as the need for volunteer drivers in their monthly newsletters, done annually
- Articles in local newspaper, senior center newsletters informing readers about the transportation service offered as well as the need for volunteer drivers.
- Posting on local social media sites, such as Facebook, twitter showing talking about the transportation service offered by Curative Connections as well as the need for volunteer drivers.
- Public Presentations regarding the service we offer are performed for agencies including the United Way, Brown County ADRC, Brown County Veterans Hospital and at any other event or facility that serves the elderly and/or the disabled individuals within Brown County.
- Curative Connections Transportation Services submits grant applications through the Wisconsin Department of Transportation 5310 Elderly and Disabled Transportation Capital Assistance Program. Part of the application requires us to post a public notice in the newspaper, as well as notify other transportation services in the area of our application, allowing them 30 days to comment.
- Curative Connections Transportation Services is listed in the Brown County Coordinated Public Transit-Human Services Transportation Plan. TIP is a fiscally constrained planning document that addresses transportation projects and programs throughout Brown County. The TIP process includes public hearings and public comment period.
- Tina Whetung – Transportation Services Program Manager/Title VI coordinator is a member of the Brown County Transportation Coordinating Committee.
- Segments on local news stations letting the public know of the Transportation Service offered by Curative Connections and also our need for volunteer drivers.

Curative Connections Limited English Proficiency (LEP) plan

As a recipient of federal US DOT funding, Curative Connections is required to take reasonable steps to ensure meaningful access to the Transportation Service offered. To do so we will use the FTA's Four Factor Analysis to design a plan that ensures that our Transportation Service provides equal opportunity to persons with limited English proficiency.

Four Factor Analysis

1. Determine the number of LEP persons who may be served or likely to encounter the American Red Cross Northeast Wisconsin region Transportation program.

Curative Connections provides a door to door shared ride service to the elderly (over 60) and person with disabilities throughout Brown County Wisconsin. The 2010 census summary listed the population of Brown County at 248,007 residents. Of the 248,007 residents 231,400 are over the age of 5 and 90% of that population speaks English, the remaining 10% speak a language other than English. Of the 10% percent who speak a language other than English 59% speak English "very well" and 41% speak English "less than very well". So of the 248,007 residents of Brown County 10,168 residents speak English "less than very well" or about 4.1% of the population. Of the 10,168 residents who speak English "very well" or "less than very well" 1,259 of them or .5% are over the age of 65 and would qualify for the Transportation service.

2. Determine the frequency with which the LEP persons come into contact with the program.

Office coordinators who answer phones and schedule client trips have had only 1 call regarding a client who speaks Spanish only. The request came from a local hospital, since the initial call they have allowed the client to schedule rides through their interpreter. Once the client is finished with their appointment, the interpreter calls us to say the client is ready and then schedules any future rides, to date this has worked out well. I have also inquired into Voices for Health which is a service which provides translation for over 150 languages, 24 hours a day, 365 days a year.

3. The nature and importance of the program, activity or service provided to people's lives.

Curative Connections provides a low cost means of Transportation for the elderly and disabled of our community, allowing them to lead a more fulfilling self-sufficient lifestyle. This much needed service is vital to those we serve, for many of them this is their only form of transportation. Clients can use the service for medical, nutritional, employment, educational and social appointments. More than half of the rides we provide are for necessary medical appointments including dialysis, chemo therapy, radiation, hyperbaric wound treatment, physical therapy and doctor appointments.

4. Determine the resources available and cost

Curative Connections Transportation Services provides a great number of services that may involve individuals with Limited English Proficiency. In order to prepare for such interaction, the agency has some bi-lingual volunteers who can assist with specific bi-lingual individuals at no cost to the agency.

LEP Plan:

How language assistance services are provided

Use bi-lingual volunteers, agency case/social workers and continue to inquire into Voice for Health to assist LEP individuals. Clarify LEP needs with callers during the registration process.

How LEP persons are informed of the availability of language assistance

- Inform case managers/social workers of language assistance
- Inform resource centers about language assistance availability
- Coordinate with other agencies for LEP resources and assistance

Monitoring and updating Language Assistance Plan

The LEP plan will be updated as required by the WI DOT or at minimum reviewed and updated when data from the U.S. Census changes. Updates will also happen if the concentration of LEP individuals increases and warrants change.

Dissemination of the LEP Plan

Copies of the LEP Plan will be kept at our office, be given to staff, volunteers and any other agency or individual that requests a copy.

Body	Caucasian	Hispanic	African American	Asian American	Native American
Population	86.1%	7.3%	2.1%	2.3%	2.2%
Brown County Transportation Coordinating Committee	100%	0%	0%	0%	0%
Northeastern Wisconsin Regional Access to Transportation Committee	90%	5%	0%	5%	0%

Curative Connections does not select the members of the Brown County Transportation Coordinating Committee or Northeastern Wisconsin Regional Access to Transportation Committee, the Membership of non-elected committees and councils listed above.

Any questions or comments regarding this plan please contact:

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