



Title VI Program For Indian Trails, Inc.

Title VI Program Statement

Indian Trails, Inc. (hereinafter referred to as “Indian Trails”) is a Michigan-based intercity bus services provider, operating daily scheduled services throughout Michigan as well as parts of Indiana, Illinois, Wisconsin and Minnesota. Indian Trails operates these schedules under contract with the Michigan Department of Transportation, as well as the Wisconsin Department of Transportation, utilizing both state and federal funding.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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).

As a requirement of receiving Federal Transit Administration (FTA) funds, Indian Trails must maintain a policy not to discriminate specifically as it relates to Section 601 of Title VI of the Civil Rights Act of 1964.

This program is designed to ensure adherence to all Title VI requirements and was developed in accordance with FTA Circular 4702.1B.

Title VI Coordinator for Indian Trails

Lisa Ginderske
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109 East Comstock St.
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Title VI Notice to the Public

See **Attachment A** which is posted at all Indian Trails public locations, including the Owosso, Romulus, and Kalamazoo facilities. Additionally, the notice is posted on the company website at www.indiantrails.com



Title VI Complaint Procedures and Complaint Form

Indian Trails has a formal procedure with instructions for filing complaints, which is detailed in **Attachment B**. Additionally, a Title VI complaint form is available in hard copy (which can be mailed to individuals) or an electronic copy is available at www.indiantrails.com. See **Attachment C** for a copy of the complaint form.

List of Title VI investigations, complaints, and lawsuits

Indian Trails will maintain a list of any and all Title VI-related complaints, investigations or lawsuits if so filed. This list would always be made available as requested. To date, there are no current Title VI-related complaints, investigations or lawsuits filed against Indian Trails.

If any related complaints are filed, they will be tracked using the form in **Attachment D**.

Public Participation Plan

Indian Trails ensures, to the maximum extent practicable, that all members of the public are involved in providing input on any changes or development in service. Any notices of a change in service are posted to the company website, as well as communicated to all of the ticketing agency locations throughout the system. No changes to schedules or pricing are ever made without factoring in the input from the public and how that change will impact them, in particular any minorities or lower income populations that would potentially be more adversely impacted by those changes.

Additionally, the Michigan Department of Transportation conducts a system-wide survey every few years of bus and train passengers that use MDOT-sponsored service. Results of those surveys are reviewed to determine if any additional changes are needed to the service that would enhance or benefit all members of the public, including minorities.

Language Assistance Plan (LAP) for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance

A comprehensive four factor analysis was last completed by Indian Trails in 2008, including all cities or towns served by Indian Trails. It should be noted that almost all of the locations served currently by Indian Trails were served during the 2008 analysis, with some communities dropped from service since 2008, while only a few were added.

The results of this analysis concluded the following:

- 1. The number or proportion of LEP persons served or encountered in the eligible service population.*

The analysis concluded that the highest percentage of LEP populations were in higher populated, metro markets such as Chicago, Milwaukee, Kalamazoo, Grand Rapids,



Lansing, East Lansing and Battle Creek. All of these markets are serviced from joint facilities shared with Greyhound, in which Greyhound is the head lessee and provides all of the necessary services, including LEP services, through their own staffing and ticketing. All of the remaining locations served only by Indian Trails are predominantly in northern Michigan (including the Upper Peninsula) where LEP populations represent a much smaller percentage of the total population (typically less than 5%). The few exceptions to this would include St. Ignace and Mackinaw City, which experience a slightly higher overall percentage due to migrant workers that come to Mackinac Island to work during the summer season months only. The encounters with these migrant workers are limited to two times during the year when they arrive before the summer, and then depart at the conclusion of the season. The only other exception was in Hancock, MI, which is home to Michigan Tech University. Due to their diverse student population, Indian Trails will also encounter some LEP individuals, but typically only during student breaks when the students will travel home or return to campus from breaks.

2. *The frequency with which LEP individuals come in contact with the service.*
Encounters with LEP individuals at any of the population areas served only by Indian Trails are very infrequent, typically numbering less than five (5) times per year combined amongst all service areas. The only exceptions, as detailed above, could be in St. Ignace and Hancock, but those would only occur during the few times of the year as detailed above.
3. *The nature and importance of the service provided.*
Indian Trails operates much of its service in low population markets, many of which only have intercity bus service as the only option to connect with larger hub markets for flights, rail services, or other bus services. Therefore, it was concluded that Indian Trails' services are an extremely important service being provided in the markets served.
4. *The resources available to the recipient.*
Indian Trails is a small, family-owned company with limited resources and funding. It would be cost prohibitive, particularly given the smaller percentage of intercity bus service it operates as compared to the company's overall business, and also compared to other public transportation services with much bigger resources and funding (such as Greyhound and Amtrak), to implement more costly translation services for LEP individuals.

Based on the analysis as completed, it was determined that no other costly translation options for LEP individuals would need to be procured and Indian Trails would rely on the services offered by Greyhound, its interlining partner (since Indian Trails uses Greyhound's point-of-sale and web-based ticketing system) to help with translation on the relatively few times it was needed.

Indian Trails continues to evaluate feedback from its ticketing agents in the field, as well as feedback from its drivers, office staff and support staff, to help determine if additional services may become necessary.



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.

Indian Trails is a small, family-owned company with just a corporate board of directors that governs, plans and advises the direction of the company. The company does maintain one committee, a Quality of Worklife committee, represented by employees of the company. The QWL Committee is made up of 10 voluntary members, one of which is an African American, with the remainder of the members being Caucasians. The committee consists of representatives from each of our four locations throughout Michigan in order to maintain equal representation from each of the facilities. All employees, including those minorities, are encouraged to volunteer and serve on the QWL committee.

Description of how the recipient monitors its subcontractors and vendors for compliance with Title VI, and a schedule of their Title VI Program submissions.

Indian Trails does not use any subcontracted vendors on its services.

Title VI equity analysis if the recipient constructs a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

While Indian Trails does not have any facility construction projects occurring at this time, the company will conduct an equity analysis for any future facility construction projects, which would include:

1. Completing a Title VI equity analysis during the planning stages with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Indian Trails will engage in outreach to persons potentially impacted by the siting of facilities and also compare the equity impacts of various siting alternatives. The analysis would occur before the selection of the preferred site.
2. When evaluating locations of facilities, Indian Trails will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be completed at the census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
3. If Indian Trails determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the company will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Furthermore, Indian Trails will show how both tests are met and will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.



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.

A board resolution will be provided approving the Title VI plan once approved by MDOT.

Service standards for Indian Trails, Inc. system-side services

Vehicle load for each mode

Indian Trails operates 51 and 55 seat-capacity coaches. The company goal is never to overload a bus or leave passengers stranded. Typical load ratios run about 50-60% during off peak schedules with peak times at 80-100%. Indian Trails has a no-standing policy on all schedules, so in the event that reservations exceed seat capacity, extra section buses are assigned to accommodate the heavier loads. Additionally, stranded passengers are typically provided alternate transportation to get them either to their final destination or to the next station for available connecting service to get them to their final destination.

Vehicle headway for each mode

Indian Trails' headways vary based on the routes served, but typically don't exceed more than 2-3 round trips per day along any one route. The northern Lower Peninsula and Upper Peninsula routes, which are operated under contract with MDOT, have a frequency of only one round trip per day.

On time performance for each mode

Indian Trails strives to operate all schedules on time, but many factors can cause delays on any schedules, including delays with connecting carriers, weather and heavier loads. A run is considered on time if it is operating within 5 minutes of published schedules. Anything running later than 5 minutes of published schedules is considered to be running late or "down". Indian Trails' goal is to maintain an on-time performance standard of at least 80% on all schedules throughout the year.

Service availability for each mode

Indian Trails currently serves almost 100 locations throughout Michigan and parts of Minnesota, Wisconsin, Indiana and Illinois. Most of these locations are within the State of Michigan, with a typical distance between any two stops of about 30-40 minutes. The majority of residents within Michigan, which is Indian Trails' primary service area, live within 25 miles of any given intercity bus stop.

Service policies for Indian Trails, Inc. system-side services

Transit amenities for each mode

Indian Trails strives to provide convenient, comfortable and safe amenities for all customers at as many locations as possible. Full service terminals with climate control, accessible restrooms, and sufficient signage/schedule information are leased and provided at many of the service locations throughout the Indian Trails system. Others are contracted with ticket agents and those



contracted agents allow use of their facilities. Indian Trails only owns two of the terminal facilities, and ensures that equitable distribution of amenities are provided at both of them when improvements are made. Since many of the locations served by Indian Trails are along rural routes and also operated during off hours, many of the remaining locations have limited or perhaps no amenities, such as flag stops. In any event, Indian Trails will continue to implement a policy of equitable distribution of transit amenities across the entire system to the maximum extent practicable.

Vehicle assignment for each mode

Indian Trails currently operates 18 full size motorcoaches system-wide. All coaches are equipped with the same amenities (including wheelchair lifts) and are of similar age, that being no less than five years old. The coaches are rotated regularly throughout the system, ensuring that a balance of mileage and usage throughout various parts of the system is maintained throughout the fleet.

Chad Cushman - President
Name and Title


Signature

04/07/2021
Approval Date



Attachment A

TITLE VI NOTICE TO PUBLIC

Indian Trails, Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transportation services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964 and Federal Transit Administration (FTA) Circular 4702.1B.

For additional information on Title VI or to file a complaint, please contact:

**Lisa Ginderske
Indian Trails, Inc.
109 East Comstock St.
Owosso, MI 48867
989.723.9602
(800)292.3831 ext. 202
lginderske@indiantrails.com
www.indiantrails.com**



Attachment B

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 Indian Trails, Inc. (hereinafter referred to as “Company”) may file a Title VI complaint by completing and submitting the Company’s Title VI Complaint Form. The Company investigates complaints received no more than 180 days after the alleged incident. The Company will process complaints that are complete.

Completed complaint forms should be submitted to:

Indian Trails, Inc.
Attn: Lisa Ginderske
109 East Comstock Street
Owosso, MI 48867
lginderske@indiantrails.com

Once the complaint is received, the Company will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by the Company.

The Company has 30 days to investigate the complaint. If more information is needed to resolve the case, the Company may contact the complainant. The complainant has 15 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 15 business days, the Company 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 Avenue SE, Washington, DC 20590.



Explain what happened and why you believe you were discriminated against, including any names of persons involved or witnesses who saw or heard the alleged incident, including their contact information if possible: _____

(Note that you may attach any written materials or other supporting information to this form that you feel is relevant to your complaint.)

Have you previously filed a complaint with this company? _____ YES _____ NO

Have you filed this same complaint with any other Federal, State or local agency or court?

_____ YES _____ NO

If you answered YES to the above, please list which agencies or courts you have filed this complaint, along with any contact names and/or phone numbers:

Name: _____ Signature: _____

Date: _____

Please submit this form via mail or email to:

Indian Trails, Inc.

Attn: Lisa Ginderske

109 East Comstock St.

Owosso, MI 48867

lginderske@indiantrails.com



Attachment D

Tracking Table for Title VI Investigations, Lawsuits and Complaints

(currently none have been filed, this table will be updated as filings are made)

	Date of Filing	Summary (include basis of complaint- race, color or national origin	Status	Action(s) Taken
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				