

The Oneida Nation

Title VI/Americans with Disabilities Act (ADA) Plan¹

November 2020

Revised on: 11/16/2020

Adopted by: Oneida Public Transit Manager
Carol J. Stiff

Adopted on: 11/16/2020

This policy is hereby adopted and signed by:

Oneida Nation: Oneida Public Transit

Executive Name/Title: Carol J. Stiff

Executive Signature:  3/14/2023

Policy Statement

Oneida Public Transit is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by Oneida Public Transit in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Title VI/ADA Plan Elements

Oneida Public Transit's Title VI/ADA plan includes the following elements:

1. Evidence of Policy Approval, Log of Policy Updates, Contact Information/Program Administration
2. Notice of Nondiscrimination
3. Complaint Procedure
4. Complaint Form
5. List of transit related Complaints, Investigations and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

¹ Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." – Title 42 USC Section 2000d

Title II of the Americans with Disabilities Act (ADA) protects individuals with disabilities from discrimination on the basis of disability in services, programs and activities provided by State and local government entities.

Oneida Public Transit will review its policy on an annual basis to determine if modifications are necessary.

Oneida Public Transit will use the table below to record reviews/revisions made to the plan.

As applicable, **Oneida Public Transit** will discuss Title VI/ADA plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI/ADA plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
11/16/2020	Draft	Carol Moore, Transit Manager	
3/14/2023	Update Carol Moore to Carol Stiff	Carol Stiff, Transit Manager	Name Change

Contact Information/Program Administration

Chief Executive

Oneida Public Transit's Chief Executive will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name:	Tina Jorgensen
Email:	tjorgens@oneidanation.org
Phone:	920-490-3904 ext. 3904

Transportation Manager

Oneida Public Transit's Transportation Manager will ensure implementation of Oneida Public Transit's federally funded transportation program. The Transportation Manager has other duties and responsibilities in addition to Title VI and ADA. This position has a direct reporting relationship and access to **Oneida Public Transit's** Chief Executive.

Name:	Carol Stiff
Email:	Cstiff2@oneidantion.org
Phone:	920-496-5775

Civil Rights Coordinator

Oneida Public Transit's Civil Rights Coordinator ensures Title VI/ADA compliance in accordance with Oneida Public Transit's federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/ADA compliance. This position has a direct reporting relationship and access to Oneida Public Transit's Chief Executive.

Name:	Carol Stiff
Email:	cstiff2@oneidanation.org
Phone:	920-496-5775

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of Oneida Public Transit's nondiscrimination requirements, including the following activities:

- ✓ Program Administration
 - Ensure compliance with federal Title VI/ADA requirements
 - Develop and implement Oneida Public Transit's Title VI/ADA Plan
 - Update and maintain Title VI/ADA program policies and procedures
- ✓ Complaints
 - Review, track, investigate and close Title VI/ADA complaints
- ✓ Employee Training
 - Educate staff on Title VI/ADA and requirements and procedures
- ✓ Reporting
 - Prepare and submit Title VI/ADA reports per state and federal regulations
- ✓ Public Dissemination
 - Notify the public of Oneida Public Transit's Title VI/ADA program requirements via Oneida Public Transit's public area, on its website, in vehicles, etc.
- ✓ Oversight
 - Ensure contractors and lessees adhere to Title VI/ADA requirements

Title VI/ADA - Notice of Nondiscrimination to the Public²

Oneida Public Transit's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

Oneida Public Transit

- ✓ Explanation of Title VI Compliance
To the extent that Title VI of the Civil Rights Act applies to a sovereign tribal nation, Oneida Public Transit assures that no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of transportation services furnished as a part of the program on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of driver's serving different routes, and location of routes may not be determined on the basis of race, color or national origin.
- ✓ Any person who believes they've been aggrieved by any unlawful discriminatory practice may file a complaint with the **Oneida Public Transit**.
- ✓ For more information on Oneida Public Transit's civil rights program, and the procedures to file a complaint, contact 920-496-5770, (for hearing impaired, please use Wisconsin Relay 711 service); email cmoore@oneidanation.org. ; or visit our administrative office at 3759 W. Mason St. Oneida, WI 54155. For more information, visit <https://oneida-nsn.gov/resources/oneida-public-transit/>
- ✓ 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 information is needed in another language, contact 920-496-5770.
Si se necesita informacion en otro idioma de contacto, 920-496-5770.
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-496-5770.

Oneida Public Transit's *Notice of Nondiscrimination* is posted in the following locations

- ✓ Agency website <https://oneida-nsn.gov/resources/oneida-public-transit/>
- ✓ Public areas of the agency office (common area, public meeting rooms, etc.)
- ✓ Inside vehicles
- ✓ Rider Guides/Schedules

Complaint Procedure

² Title VI and ADA regulations require **Oneida Public Transit** to inform customers and the public of their rights under Title VI and ADA regulations by posting a *Notice of Nondiscrimination*. The public notice must include:

- ✓ A statement of nondiscrimination;
- ✓ Information on how to request additional information about the agency's Title VI and ADA obligations, including information on how to file a complaint, the location of the complaint form, etc.;
- ✓ Information on how to request Title VI and ADA information in another language, if required.

The *Notice of Nondiscrimination* should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities

Oneida Public Transit's Complaint Procedure is made available in the following locations: (*list all that apply*)

- ✓ Agency website, either as a reference in the Notice to Public or in its entirety
 - ✓ Public areas of the agency office (common area, public meeting rooms, etc.)
 - ✓ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
 - ✓ Other, _____
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Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by Oneida Public Transit may file a complaint by completing and submitting Oneida Public Transit's Complaint Form.

The Complaint Form may also be used to submit general complaints to the **Oneida Public Transit**.

Oneida Public Transit investigates complaints received no more than 180 business days after the alleged incident. Oneida Public Transit will process complaints that are complete.

Once the complaint is received, Oneida Public Transit will review the complaint and work to resolve the complaint informally, if possible.

If the complaint warrants a formal civil rights complaint process, Oneida Public Transit will follow the steps listed in this complaint procedure. Oneida Public Transit may also use this formal procedure to address general complaints. If Oneida Public Transit determines it has jurisdiction the complainant will receive an acknowledgement letter stating the complaint will be investigated by Oneida Public Transit as a civil rights complaint.

Oneida Public Transit has 10 business days to investigate the civil rights complaint. If more information is needed to resolve the case, Oneida Public Transit may contact the complainant.

The complainant has 5 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 5 business days, Oneida Public Transit 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, one of two (2) letters will be issued 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/ADA violation and that the case will be closed.
- ✓ A letter of finding (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, the complainant has 10 business 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.

If information is needed in another language, then contact 920-496-5770.

Si se necesita informacion en otro idioma de contacto, 920-496-5770.

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau 920-496-5770

Oneida Public Transit- Complaint/Comment Form

Oneida Public Transit is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at [\[redacted\]](#) or in person at the address below.

Oneida Public Transit
3759 W. Mason St.
Oneida, WI 54155

You may also call us at 920-496-5770. Please make sure to provide your contact information in order to receive a response.

Section A: Accessible Format Requirements

Please check the preferred format for this document

<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD or Relay	<input type="checkbox"/> Audio Recording	<input type="checkbox"/> Other (if selected please state what type of format you need in the box below)
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[Click or tap here to enter text.](#)

Section B: Contact Information

Name Click or tap here to enter text.	Telephone Number (including area code) Click or tap here to enter text.
Address Click or tap here to enter text.	City Click or tap here to enter text.
State Click or tap here to enter text.	Zip Code Click or tap here to enter text.

Email Address [Click or tap here to enter text.](#)

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.

[Click or tap here to enter text.](#)

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section C: Type of Comment

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Complaint	<input type="checkbox"/> Suggestion	<input type="checkbox"/> Compliment	<input type="checkbox"/> Other
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Which of the following describes the nature of the comment? Please check one or more of the check boxes.

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Religion
<input type="checkbox"/> Age	<input type="checkbox"/> Gender	<input type="checkbox"/> Service	<input type="checkbox"/> Income Status
<input type="checkbox"/> Limited English Proficient (L.E.P)		<input type="checkbox"/> Americans with Disability Act (A.D.A)	

Section D: Comment Details

Please answer the questions below regarding your comment

Did the incident occur on the following type of service? <i>Please check any box that may apply.</i>	<input type="checkbox"/> Paratransit	<input type="checkbox"/> Shared Ride Taxi	<input type="checkbox"/> Bus
What was the date of the occurrence?	Click to add date in the following format: Day, month, year		
What was the time of the occurrence?	Click to add the time		
What is the name or identification of the employee or employees involved?	Click or tap here to enter text.		
What is the name or identification of others involved, if applicable?	Click or tap here to enter text.		
What was the number or name of the route you were on, if applicable?	Click or tap here to enter text.		
What was the direction or destination you were headed to when the incident occurred, if applicable?	Click or tap here to enter text.		
Where was the location of the occurrence?	Click or tap here to enter text.		
Was the use of a mobility aid involved in the incident?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please add any additional descriptive details about the incident.	Click or tap here to enter text.		

In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.

Section E: Follow-up

May we contact you if we need more details or information?

Yes

No

If yes, how would you best liked to be reached? Please select your preferred form of contact below

Phone

Email

Mail

If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

Section F: Desired Outcome

Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

Section G: Signature

Please attach any documents you have which support the allegation. Then date and sign this form and send it to Oneida Public Transit Office

Name

Date: Click to add date in the following format: Day, month, year

Signature
