

# WESTERN OAKLAND TRANSPORTATION AUTHORITY (WOTA)

## TITLE VI PLAN

### **I. Plan Statement**

Title VI of the Civil Rights Act of 1964 Title VI, 42 U.S.C. § 2000d *et seq.* as amended, (Title VI) 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. §2000d).*

The Western Oakland Transportation Authority (WOTA) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or is subjected to discrimination in its transit services based on race, color, or national origin, as protected by Title VI and Federal Transit Administration (FTA) Circular 4702.1B. This plan provides guidance for the administration and management of Title VI-related activities.

#### **Title VI Coordinator Contact Information**

Kim Viener, Director  
Western Oakland Transportation Authority  
250 W. Livingston Road  
Highland, MI 48357  
Phone: (248) 887-4979  
Email: [director@ridewota.org](mailto:director@ridewota.org)

### **II. Title VI Dissemination**

Title VI information posters shall be prominently displayed in WOTA facilities and on revenue vehicles. The Title VI Plan, policy statement, and complaint procedures are publicly available on WOTA's website at [www.ridewota.org](http://www.ridewota.org) and are available in alternative formats upon request. WOTA's Title VI Public Notice is attached hereto as Appendix G.

Title VI information is disseminated to all employees annually (Appendix A). All employees receive a copy of this plan and are required to sign an Acknowledgement of Receipt (Appendix B). New employees are informed of Title VI requirements during orientation.

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

All subcontractors and vendors receiving federal funds through WOTA are subject to the provisions of Title VI. Contract documents and bid specifications include nondiscrimination assurances consistent with federal and state requirements.

### **IV. Record Keeping**

The Title VI Coordinator maintains records including employee acknowledgements, Title VI complaints, investigations, correspondence, and related documentation. Records are retained in accordance with federal and state retention requirements.

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

Any person can file a signed, written Title VI complaint within 180 days of the alleged discrimination. Complaints may be submitted by mail or email to the Title VI Coordinator. WOTA will acknowledge receipt of all complaints within seven (7) calendar days and make every effort to resolve complaints within sixty (60) working days.

Complainants may also file a complaint directly with the Federal Transit Administration Office of Civil Rights at:

**Federal Transit Administration**  
Office of Civil Rights – Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

### **How to File a Title VI Complaint**

A complainant may file a signed, written Title VI complaint within one hundred eighty (180) days from the date of the alleged discrimination.

The complaint (Appendix C) should include:

- The complainant's name, mailing address, and contact information (telephone number and/or email address)
- A description of how, when, where, and why the alleged discrimination occurred
- The location of the incident and the names and contact information of any witnesses

- Any other information the complainant deems significant

The Title VI Complaint Form (see Appendix C) may be used to submit this information. Complaints may be filed in writing or by email with WOTA at:

**Western Oakland Transportation Authority (WOTA)**

250 W. Livingston Road

Highland, MI 48357

Phone: (248) 887-4979

Email: [director@ridewota.org](mailto:director@ridewota.org)

WOTA encourages complainants to send certified mail or otherwise ensure that correspondence can be tracked. For complaints originally submitted by facsimile, an original signed copy must be mailed to the Title VI Coordinator within the 180-day filing period.

**Complaint Review Process**

All complaints alleging discrimination based on race, color, or national origin in a WOTA service or benefit will be investigated directly by WOTA. Appropriate assistance will be provided to complainants, including individuals with disabilities or limited English proficiency.

- A written acknowledgement of receipt will be sent within seven (7) calendar days (see Appendix D).
- Failure to provide requested additional information may result in administrative closure of the complaint.
- Every effort will be made to issue a written determination within sixty (60) working days of receipt.

**Notification of Outcome**

WOTA will issue a final written response to the complaint indicating whether the complaint has been found to be substantiated (Appendix E) or not substantiated (Appendix F). If the complaint is not substantiated, the complainant will be advised of the right to:

1. Appeal the decision within seven (7) calendar days of receipt; and/or
2. File a complaint with the U.S. Department of Transportation or the Federal Transit Administration (FTA).

Once sufficient information is received, a draft response will be reviewed by WOTA's legal counsel. If appropriate, the complaint may be administratively closed, and the complainant will be notified.

In addition to WOTA's process, complaints may be filed directly with:

**Federal Transit Administration**  
Office of Civil Rights – Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## **VI. Title VI Investigations, Complaints, and Lawsuits**

As of April 2026, WOTA has not received any Title VI investigations, complaints, or lawsuits.

## **VII. Limited English Proficiency (LEP) Four Factor Analysis**

WOTA conducted its LEP analysis using the most recent American Community Survey (ACS) 5-Year Estimates available at the time of this plan update.

### **Factor 1: Number or Proportion of LEP Persons**

Analysis of ACS data indicates that the vast majority of individuals within WOTA's service area speak English proficiently, and no language group meets the Safe Harbor Threshold of five percent (5%) of the population or 1,000 individuals.

### **Factor 2: Frequency of Contact with LEP Persons**

Based on staff interviews, service logs, and rider interactions, WOTA has minimal contact with LEP individuals and has not received requests for interpretation or translated materials.

### **Factor 3: Nature and Importance of the Service**

Public transportation is an important service; however, current demographic data and service experience indicate limited LEP demand in WOTA's service area.

### **Factor 4: Resources and Costs**

WOTA has assessed the costs of translation and interpreter services and determined that a full LEP Plan is not warranted at this time.

### **Limited English Proficiency (LEP) Policy**

Although a formal LEP Plan is not currently required, WOTA will provide reasonable language assistance as needed, including:

- Use of Census "I Speak" cards
- Access to telephonic interpretation services (Language Line)
- Documentation of language assistance requests

WOTA will reassess the need for a formal LEP Plan if population levels, service characteristics, or language assistance requests materially change.

### **Language Assistance Procedures**

If an interpreter is needed immediately, whether in person or by telephone, staff will use Census Bureau "I Speak" cards to identify the required language. Staff will then contact Language Line services to obtain interpretation assistance following established access procedures.

### **Staff Training and Responsibilities**

WOTA will ensure that staff are educated on the following:

- Understanding the Title VI Policy and LEP responsibilities
- How to access language assistance services through Language Line
- Documentation of language assistance requests
- Procedures to follow if a Title VI and/or LEP complaint is filed

### **VIII. Community Outreach**

WOTA conducts community outreach through public meetings, coordination with regional partners, publication of service information, and engagement with local service organizations. All public meetings are conducted in compliance with the Open Meetings Act.

## **IX. Equity Analysis**

WOTA will conduct a Title VI equity analysis when planning new or expanded facilities, major service changes, fare changes, or policy decisions with potential equity impacts. Analyses will assess whether decisions result in disparate impacts based on race, color, or national origin.

## **X. Plan Review and Update**

This Title VI Plan will be reviewed and updated at least every three (3) years, or sooner if significant demographic, organizational, or service changes occur.

Amended: **April 2026**

**Adopted:** May 2026

**Next Scheduled Review:** April 2029

**Appendix A: Employee Annual Education Form**

Title VI Policy Statement

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 Western Oakland Transportation Authority are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches an employee with a question or complaint, the employee shall direct the individual to the Title VI Coordinator.

Kim Viener

Director, Western Oakland Transportation Authority

Title VI Coordinator

Employees are expected to use courtesy titles (Mr., Mrs., Ms., or Miss) in all public interactions, without regard to race, color, or national origin.

**Appendix B: Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge receipt of the WOTA 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 WOTA transit services on the basis of race, color, or national origin, as protected by Title VI and FTA Circular 4702.1B.

Employee Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

**Appendix C: Title VI Complaint Form**

Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance.

Individuals who believe they have been discriminated against by WOTA transit services may file a complaint by completing this form and submitting it to:

**Western Oakland Transportation Authority (WOTA)**

250 W. Livingston Road

Highland, MI 48357

Phone: (248) 887-4979

Email: director@ridewota.org

**Complainant Information**

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City/State/ZIP: \_\_\_\_\_

Telephone Number(s): \_\_\_\_\_

Are you filing this complaint on your own behalf?  Yes  No

If no, please provide the name of the person discriminated against:

\_\_\_\_\_

Please indicate the basis of the alleged discrimination (check all that apply):

Race / Color

National Origin

Income

Other

Date of Alleged Discrimination: \_\_\_\_\_

Location of Incident: \_\_\_\_\_

Please describe the circumstances of the alleged discrimination:

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Please list any witnesses and their contact information:

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Have you filed this complaint with another agency or court?  Yes  No

If yes, please identify all the agencies/courts that apply and include a contact person at each agency/court:

Federal Court \_\_\_\_\_

Federal Agency \_\_\_\_\_

State Court \_\_\_\_\_

State Agency \_\_\_\_\_

Local Agency \_\_\_\_\_

Requested corrective action (if any):

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

**Western Oakland Transportation Authority (WOTA)**

250 W. Livingston Road

Highland, MI 48357

Phone: (248) 887-4979

Email: [director@ridewota.org](mailto:director@ridewota.org)

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

***Appendix D: Sample Letter – Acknowledgement of Receipt of Complaint***

*Date*

*Complainant Name*

*Address*

*Dear Complainant Name:*

This letter acknowledges receipt of your Title VI complaint against the Western Oakland Transportation Authority (WOTA). An investigation will begin shortly. If you have additional information or questions, please contact me at this office.

Sincerely,

Title VI Coordinator

Western Oakland Transportation Authority

**Appendix E: Sample Letter – Complaint Substantiated**

*Date*

*Complainant Name*

*Address*

Dear *Complainant Name*:

Following investigation of your complaint referenced in your letter of (date) against Western Oakland Transportation Authority (WOTA) alleging Title VI violation, one or more violations of Title VI of the Civil Rights Act of 1964 were identified. Corrective actions are underway.

Thank you for bringing this important matter to our attention. You were extremely helpful during our review of the program. If there are further actions needing your action you may be hearing from this office, or from federal authorities.

Sincerely,

Title VI Coordinator

Western Oakland Transportation Authority

**Appendix F: Sample Letter – Complaint Not Substantiated**

*Date*

*Complainant Name*

*Address*

*Dear Complainant Name:*

The investigation of your Title VI complaint did not find evidence of a violation. The results of the investigation did not indicate that 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.

WOTA has analyzed the materials and facts pertaining to your case for evidence of the authority's failure to comply with any civil rights laws. There was no evidence found that any of these laws had been violated.

Therefore, your complaint has not been substantiated, and this matter is now closed. You retain the right to appeal the decision within seven (7) calendar days or to file a complaint with the Federal Transit Administration Office of Civil Rights at:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

Thank you for reaching out to us. If I can be of assistance to you in the future, do not hesitate to call me at (248) 887-4979.

Sincerely,

Title VI Coordinator  
Western Oakland Transportation Authority

**Appendix G: Title VI Public Notice**

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 USC Section 2000d).

The Western Oakland Transportation Authority is committed to ensuring equal access to its transit services. Individuals who believe they are being denied participation in, or being denied benefits of the transit services provided by WOTA, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability you may contact our office at:

**Western Oakland Transportation Authority (WOTA)**

250 W. Livingston Road

Highland, MI 48357

Phone: (248) 887-4979

Email: [director@ridewota.org](mailto:director@ridewota.org)

For additional information, visit [www.ridewota.org](http://www.ridewota.org).