



Title VI Plan

10/1/2026- 09/30/2029

Jackson Area Transportation Authority

2350 E. High St.

Jackson, MI 49203

Revision Date	Authors	Version	Section	Summary
1/20/2006	Oliver Lindsay	1	N/A	Original
12/10/2008	Oliver Lindsay	2	N/A	Updated Policies & Procedures
05/02/2017	Lane Masoud	3	N/A	Updated entire document, added LEP plan, added Title VI Complaint Form, added service standards
12/2/2017	Jeffrey Wickman	4	N/A	Hired new staff and changed person responsible
07/20/2019	Chad Cumberworth	5	N/A	Policy Statement and section, Public Outreach Activities section
05/6/2024	Pat O'Dowd	6	N/A	Full update and refresh
12/12/2024	James Garner Jr.	7	N/A	New hired staff and changed person responsible
09/4/2026	Hunter Causie	8		Annual Review, Staff Changes, Event updates

Policy Statement and Approval

The Jackson Area Transportation Authority (JATA) as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Michigan Department of Transportation (MDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Originally Adopted on: January 6, 2006

Adopted by: JATA Board of Directors

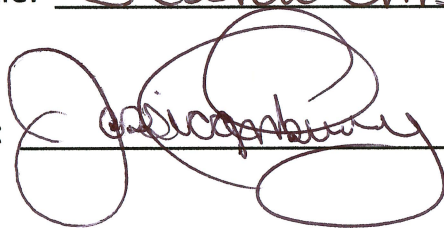
Revised on: September 4, 2026

This policy is hereby adopted and signed by:

Jackson Area Transportation Authority Board of Directors

Name/ Title: Jessica Embrey - President

Signature: _____



Title VI, Notice to the Public

The Jackson Area Transportation Authority (JATA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with JATA.

For more information on JATA's Title VI Program and the procedures to file a complaint, please call (517) 787-8363 or email Info@mijata.org or visit our administration office at 2350 East High Street, Jackson, Michigan 49203.

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.

JATA's Title VI Notice to the Public is posted in the following locations:

- The JATA website under the "About JATA" tab
- Information board in the lobby of the administration building
- Information board in the lobby of the downtown transfer center
- Inside all JATA vehicles

Title VI Complaint Procedure

JATA's Title VI Complaint Procedure is made available in the following locations:

- As a reference posted on the JATA website.
- Hard copy in the administrative office located at:

Jackson Area Transportation Authority
2350 East High Street
Jackson, MI 49203

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by JATA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form or submitting a letter with the same information.

JATA investigates complaints received no more than 180 days after the alleged incident. JATA will process complaints that are complete.

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

JATA has 15 calendar days to investigate the complaint. If more information is needed to

resolve the case, JATA may contact the complainant.

The complainant has 15 calendar 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 calendar days, JATA 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.
- A 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.

Appeals are due to JATA within 15 calendar days after the date on the closure letter or letter of finding.

Title VI Complaint Form

You are not required to use this form to submit a Title VI complaint; a letter with the same information is sufficient.

Section I:				
Name:				
Address:				
Phone (home):			Phone (work):	
E-mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
☐ Race ☐ Color ☐ National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach any additional details.				

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 with any Federal or State court?		
☐ Yes ☐ No		
If yes, check all that apply:		
☐ 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.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Phone: _____		
Section VI		
Name of agency complaint is against: _____		
Contact person: _____		
Title: _____		
Phone number: _____		

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

Signature and date required below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Jackson Area Transportation Authority
Attention: Title VI Coordinator
2350 E. High St.
Jackson, MI 49203

List of Transit Related Title VI Investigations, Complaints, and Lawsuits

JATA maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit related activities.

DATE	SUMMARY	STATUS	ACTION(S) TAKEN
Investigations			
None			
Lawsuits			
None			
Complaints			
None			

Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, JATA will employ the following strategies, as appropriate:

- Provide for frequent and continuous engagement by the public.
- Select accessible and varied meeting locations and times.
- Employ different avenues for engagement including electronic, in person, phone, etc.
- Use social media in addition to other resources as a way to gain public involvement.
- Use radio, television or newspaper ads on stations and in publications that serve LEP populations.
- Expand traditional outreach methods by visiting community centers, libraries, faith-based institutions, social service organizations, local festivals, etc.

Public Outreach Activities

JATA maintains a log of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, JATA reviews this log to determine if additional or different strategies are needed to promote inclusive public participation.

Event Date	Event	Communication Method	Outreach Method	Notes
Continuous	Social Media	Social Media	Social Media	Campaigns advertising, showcasing, and encouraging the public to utilize our services
Fall of Each Year	Jackson College Jet Jam	Social media, flyers, local service agencies	Staff on site, connecting with new students	Promoting our services to new and returning students
May and October of Each Year	National Transportation Week & Try Transit Week	Social media, flyers, local service agencies, local media	Staff on site, celebrating & connecting with the riders, connecting them with other services in the community	Rider giveaways, prizes, opportunities for riders to connect with area service providers
Quarterly	Appearance on JTV (Local TV)	In-person appearances	Television & social media	Promoting our services, encouraging JTV's audience to ride.

Language Assistance Plan

As a recipient of federal US DOT funding, JATA is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

To determine if an individual is entitled to language assistance and what specific services are appropriate, JATA has conducted a Four Factor Analysis of the following areas:

- 1) Demography
- 2) Frequency
- 3) Importance
- 4) Resources and Costs

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area. The first factor of the Four Factor Analysis is the basis of the Language Assistance Plan. It requires JATA to review its US Census data to determine if it meets the LEP Safe Harbor Threshold.

	Jackson County (18+)	Jackson Urbanized Areas
Total	125,201	31,309
Speak Only English	121,715	28,204
Speak Spanish	2270	785
Speak English "Very Well"	1805	526
Speak English "Less than Very Well"	465	259
Speak Other Languages	1216	284
Speak English "Vey Well"	946	153
Speak English "Less than Very Well"	270	131

The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less of the population to be served) JATA must provide translation of vital documents in written format for the non-English users. Jackson County does not currently have any language groups that exceed that threshold and, therefore, JATA is not required to provide written translation of any vital documents.

Factor 2: Frequency: Identifies the frequency staff comes into contact with LEP persons.

JATA demand-response dispatchers have reported that they don't currently have any passengers scheduling rides that are not English proficient.

A quick survey of drivers found that there are less than 5 Spanish speaking families that ride regularly. The younger members of these families are able to speak English well and translate for the adults when necessary.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

Fixed-route buses provide over 300,000 trips per year, serving major Jackson institutions such as Jackson College and Henry Ford Allegiance Health as well as the historic downtown shopping district, Walmart, Meijer, Jackson YMCA, senior housing complexes, schools and parks, and many more local destinations.

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

JATA works to connect with potential customers in all corners of the community. However, given JATA's increasingly limited funding and the extremely low demand for LEP services, JATA has few LEP focused resources. JATA does train drivers and dispatchers on the basic principles of Title VI and additional training is provided on an as needed basis. Any Title VI related complaints are resolved as soon as possible and typically result in driver coaching or retraining as necessary.

JATA - Summary of the Language Assistance Plan Components

JATA reviews its plan on an annual basis or more frequently as needed. In particular, JATA will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

In the future, if JATA meets the Safe Harbor Threshold for any language group or if JATA finds that there is an increased demand, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Minority Representation Information

The table below depicts JATA's non-elected committees/'councils related to transit.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Other Nationality
County Population	85%	3%	8%	<1%	<1%	2%
JATA Board of Directors	78%	0%	22%	0%	0%	0%
Local Transportation Advisory Council	88%	0%	0%	0%	0%	11%

JATA understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, JATA encourages participation of all its citizens.

To encourage participation on its boards, committees and councils, JATA will continue to reach out to community organizations to connect with all populations. In addition, JATA schedules meetings at times best suited to its members and can provide members free rides to/from meetings upon request.

Fixed Route Service Standards

Vehicle Load Standards

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 5 passengers for a Caravan, 6 passengers for a Transit, 14 passengers for a Sprinter, 20 passengers for an International, 28 passengers for a low-floor 29-foot buses, 32 passengers for a low-floor 35-foot buses, and 40 passengers for a low-floor 40-foot bus. See the **Average Passenger Capacities** table below.

Vehicle Type	Seated	Seated/ Wheelchair
Light Duty Van – Caravan	-	4/1
Light Duty Van - Transit	-	5/1
Medium Duty - Sprinter	14	3/4
Medium Duty - International	20	0/6
29' Low Floor Bus	28	24/2
35' Low Floor Bus	32	25/2
40' Low Floor Bus	40	33/2

Vehicle Headway Standards

Service operates throughout the urban area at 30-minute intervals from 6:15 AM to 6:15 PM on weekdays. Saturday urban service operates at 30-minute intervals from 10:15 AM to 6:15 PM. Feeder service to the Veterans Affairs Clinic operates at 2-hour intervals in the morning and afternoon, Monday through Friday. Routes serving Baker College, Jackson Community College, and other local schools operate hourly throughout the day, Monday through Friday when schools are in session.

Scheduling involves the consideration of a number of factors including: ridership productivity, connections, density of transit-dependent population and activities, internal schedules of major trip generators, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-Time Performance Standards

A fixed-route vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than four minutes late. JATA's on-time performance objective is 85% or greater. JATA continuously monitors on-time performance and system results are published internally and provided to the JATA Board of Directors as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

Local bus stops will not be more than 2 city blocks apart.

Fixed Route Service Policies

Vehicle Assignment Policy

Vehicles are assigned to routes based on ridership and bus capacity, with larger buses being assigned to more popular routes. All of our buses are accessible and meet Americans with Disabilities Act (ADA) standards. All vehicles are equipped with air conditioning and automated stop announcement systems.

Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 28-foot buses rather than the 35-foot buses.

Transit Amenities Policy

Installation of transit amenities along bus routes are based on the number of passengers boarding at the stops along those routes.

