



# Cortland County Community Action Program, Inc.'s TITLE VI Plan

Date Adopted: February 27, 2025

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## A. PROGRAM DESCRIPTION AND SERVICES

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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."

Subrecipients of public transportation funding from the Federal Transit Administration (FTA), are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory. Cortland County Community Action Program, Inc.'s is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how Cortland County Community Action Program, Inc.'s incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

Cortland County Community Action Program, Inc.'s is a nonprofit who receives FTA Section 5310 funding through NYSDOT to provide transportation for older adults aged 60 and over as well as individuals of any age with a qualifying disability, in the City of Rural, NY. Service is provided through a contract with a transit operator and transit services are available seven days a week from 8:00 AM until 8:00 PM. The fare is \$1 each way.

## **B. Cortland County Community Action Program, Inc.'s TITLE VI PLAN**

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 funds, Cortland County Community Action Program, Inc.'s Title VI plan shall comply with Title VI of the Civil Rights Act of 1964 as presented with the following elements:

- ✓ Title VI Notice to the Public, including a list of locations where the notice is posted
- ✓ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ✓ Title VI Complaint Form
- ✓ List of transit-related Title VI investigations, complaints, and lawsuits
- ✓ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission
- ✓ Language Assistance Plan for providing language assistance to persons with limited English proficiency
- ✓ A table depicting the membership of transit related non-elected committees and councils, the membership of which is selected by the subrecipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ✓ 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. The approval must occur prior to submission to NYSDOT. (Board approval is not required if the subrecipient does not have a Board.)

The Cortland County Community Action Program, Inc.'s shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

## B1. Cortland County Community Action Program, Inc.'s TITLE VI Policy

The Cortland County Community Action Program, Inc.'s commits to comply with Title VI of the Civil Rights Act of 1964 that 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" (Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.). This requirement is included in the Section 5310 agreement between Cortland County Community Action Program, Inc.'s and NYSDOT and third-party contractors.

For more information on Cortland County Community Action Program, Inc.'s's Title VI program contact:

**Danielle Treacy – Title VI Coordinator**

Cortland County Community Action Program, Inc.'s  
HR Generalist  
32 N. Main Street  
Cortland, New York, 13045  
(607) 753-6781  
daniellet@capco.org

## B2. Title VI Public Notice

The Cortland County Community Action Program, Inc.'s's Notice to the Public is posted in the following locations:

- ☒ Agency website at: [www.capco.org](http://www.capco.org)
- ☒ Public areas of the agency office including front foyer/lobby and employee break room hallway
- ☒ Inside transit vehicles

A sample of the notice posted is shown on the next page.

The Cortland County Community Action Program, Inc.'s operates its programs and services without regard to race, color, and national origin, in accordance with Title VI of the Civil Rights Act of 1964. Cortland County Community Action Program, Inc. also operates its programs and services to accommodate persons with disabilities under the Americans with Disabilities Act of 1990. Any person who believes they are subject to discrimination based on race, color, national origin or disability may file a complaint with Cortland County Community Action Program, Inc.'s.

For information on Cortland County Community Action Program, Inc.'s Title VI policy or to obtain the Title VI complaint form and procedures visit our website at [www.capco.org](http://www.capco.org). Or contact:

**Danielle Treacy-Title VI Coordinator**  
Cortland County Community Action Program, Inc.'s  
32 N. Main Street  
Cortland, New York 13045  
(607) 753-6781  
[daniellet@capco.org](mailto:daniellet@capco.org)

A complainant may also file a complaint directly with New York State Department of Transportation on its Civil Rights website at <https://www.dot.ny.gov/main/business-center/civil-rights/title-vi-ej>.

A complaint can also be filed directly with the 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

For information in another language, please contact the Title VI Coordinator.

Si necesita información en otra idioma, por favor contacto 607-753-6781.

### B3. Title VI Complaint Procedures and Complaint Form

The Cortland County Community Action Program, Inc.'s Title VI Complaint Procedure is available in the following locations:

- ☒ Agency website at: [www.capco.org](http://www.capco.org)
- ☒ Hard copy in the central office
- ☒ In client intake materials

Anyone who believes they have been discriminated against on the basis of race, color, or national origin, may file a complaint by completing and submitting the Title VI Complaint Form (contained in *Appendix B*) to the address below.

Cortland County Community Action Program, Inc.'s  
Danielle Treacy-Title VI Coordinator  
32 N. Main Street  
Cortland, NY 13045  
(607) 753-6781  
[daniellet@capco.org](mailto:daniellet@capco.org)

The complaint form is not required to file a complaint. The complainant may submit any written report as a complaint notice. Cortland County Community Action Program, Inc.'s will make reasonable modifications and take information verbally if the complainant requires this accommodation.

The Cortland County Community Action Program, Inc.'s investigates complaints received no more than 180 days after the alleged incident. Once the complaint is received, the Cortland County Community Action Program, Inc.'s will follow the steps below:

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if the Cortland County Community Action Program, Inc.'s has jurisdiction to investigate the complaint.
3. Plan to complete the investigation within 45 days.
4. Schedule an interview, if deemed necessary.
5. Determine if other public or private entities are or should be involved.
6. Determine if additional information is needed. Complainant has 15 days to provide the additional information.
7. If the Cortland County Community Action Program, Inc.'s is not contacted by the complainant or does not receive the additional information within 15 days, the case can be administratively closed. Additionally, a case can be administratively closed if the complainant no longer wishes to pursue the case.
8. Determine if meetings with the affected party or other interested parties are needed.

After the investigative process has been completed, the Cortland County Community Action Program, Inc.'s will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF).

1. A **closure letter** summarizing the allegations and stating that there was no Title VI violation and that the case will be closed. (*Appendix D*)
2. A **letter of finding (LOF)** summarizing the allegations and the interviews regarding the alleged incident, and explaining whether any disciplinary action, additional training of the staff member, or other action will occur. (*Appendix E*)

If the complainant wishes to appeal the decision, the complainant must submit the appeal within 21 days after the date of the closure letter or the LOF.

Filing complaints with Cortland County Community Action Program, Inc.'s enables the agency to properly investigate the complaint. A person may also file a complaint directly with:

- New York State Department of Transportation  
Office of Diversity and Opportunity  
50 Wolf Road, 6th Floor  
Albany, NY 12232  
(518) 457-1129 Fax (518) 549-1273  
OCR-TitleVI@dot.ny.gov
- 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

If information is needed in another language, please contact Cortland County Community Action Program, Inc.'s at (607)-753-6781.

*Si se necesita informacion en otro idioma por favor contacto, (607)-753-6781.*



## B4. Transit Related Title VI Complaints, Investigations and Lawsuits

The Cortland County Community Action Program, Inc.'s maintains a log of all Title VI complaints, investigations, and lawsuits pertaining to its transit-related activities since the last Title VI plan update. (Do not include the complainant name. A case number is preferable.)

**Reporting Period:**

1/1-12/31/2022

1/1-12/31/2023

1/1-12/31/2024

**Check One:**

X

There have been no investigations, complaints and/or lawsuits filed against Cortland County Community Action Program, Inc.'s during the reporting period.

There have been investigations, complaints and/or lawsuits filed against Cortland County Community Action Program, Inc.'s. *See list below.*

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, national origin)	<b>Status</b> (open/closed)	<b>Disposition</b> (finding/no finding)
<b>Complaints</b>				
1.				
2.				
3.				
<b>Investigations</b>				
1.				
2.				
3.				
<b>Lawsuit</b>				
1.				
2.				
3.				

## B5. Public Involvement Process

### ***Strategies and Desired Outcomes***

This section describes how Cortland County Community Action Program, Inc.'s will disseminate vital agency information and engage the public in the decision-making process. We will seek out and consider the input and needs of interested parties and groups traditionally underserved by transportation systems. These groups may face challenges accessing our services, such as minority and limited English proficient (LEP) persons. Underlying these efforts is our commitment to determining the most effective public involvement methods for a given project or population.

Cortland County Community Action Program, Inc.'s primarily serves only clients that have been determined to be eligible for our transit service by the **Medicaid Transportation Management, Medical Answering Services (MAS)** (Funder). The Funder, as a recipient of federal financial assistance, must comply with all Title VI requirements in the development and delivery of their programs. Cortland County Community Action Program, Inc.'s serves all individuals who are determined by the Funder to be eligible for services, without regard to race, color, or national origin and low-income status.

### ***Public Outreach Activities***

Cortland County Community Action Program, Inc.'s's program decision-making public involvement is limited to the population that meets the eligibility criteria set by the **Medicaid Transportation Management, Medical Answering Services (MAS)** (Funder). The Funder is the lead agency for public involvement in the decision-making process with the goal of offering minority and low-income individuals the opportunity to comment on the benefits of the program services being provided with federal financial assistance. Funder outreach consists of relationship building with agencies and stakeholders that provide services to minorities, low-income families and LEP communities

Cortland County Community Action Program, Inc.'s assists the Funder during open-house events and the enrollment period as well as promoting the Funder's public involvement campaign to a diverse community. Members of the public who request notices and or handouts in a language other than English will be referred to staff who can provide interpretation assistance or to the Funder for assistance.

## **Summary on Public Involvement Activity**

☒ Not applicable; Cortland County Community Action Program, Inc.'s is a closed door service provider.

## **B6. Language Assistance Plan**

### **Language Assistance Plan Components**

Limited English Proficient (LEP) persons are people for whom English is not the primary language and who have a limited ability to read, write, speak, or understand English. To comply with the FTA Title VI requirement on nondiscrimination based on national origin, as it affects limited English proficient persons, Cortland County Community Action Program, Inc.'s will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons.

In order to ensure meaningful access to Cortland County Community Action Program, Inc.'s programs and activities, we shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide to access the transit services. A careful analysis of the clientele and potential clientele we serve will determine if we communicate effectively with LEP persons and the language spoken other than English. The Four Factor Analysis is an individualized assessment that balances the following four factors.

1. A number or proportion of the LEP population(s), specifically served or could be served by Cortland County Community Action Program, Inc.'s transit service.
2. The frequency with which LEP persons come into contact with Cortland County Community Action Program, Inc.'s.
3. The nature and importance of Cortland County Community Action Program, Inc.'s transit services to LEP population(s).
4. The resources available for LEP outreach and how employees are trained to provide language assistance to LEP persons.

### **LEP Four Factor Analysis**

To determine if an LEP population requires language assistance and what specific language services are appropriate, the Cortland County Community Action Program, Inc.'s has conducted a Four Factor Analysis<sup>1</sup> of the following areas: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

**Factor 1–Importance** | A number or proportion of the LEP population(s), specifically served or could be served by Cortland County Community Action Program, Inc.'s transit service

The Human Service – Public Transportation Coordination Plan provides the results of the assessment of the number or proportion of LEP persons and the languages spoken in the service area. The Cortland County Community Action Program, Inc.'s service area covers

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<sup>1</sup> DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

Cortland County in New York and includes individuals speaking a wide range of languages. The Human Service – Public Transportation Coordination Plan identified the following language groups that meet the threshold for translation of key materials: Spanish.

**Factor 2: Frequency** | Frequency with which LEP people come into contact with Cortland County Community Action Program, Inc.'s

Based on the results of the number or proportion of the LEP population(s), specifically served or could be served by Cortland County Community Action Program, Inc.'s transit service, Cortland County Community Action Program, Inc.'s we know that less than 5% of the transit service population we serve speak English less than very well. Cortland County Community Action Program, Inc.'s will conduct additional assessments at least annually or if a known spike occurs that requires a re-evaluation of the LEP population.

**Factor 3: Importance** | Importance of Cortland County Community Action Program, Inc.'s transit services to LEP population

The Cortland County Community Action Program, Inc.'s's program and services are critical to the lives of its clients, enabling them to participate as fully as possible in the community, interact and socialize with others, gain skills in daily living and travel to/from work.

**Factor 4: Resources and Costs** | To meet the language assistance needs of the Cortland County Community Action Program, Inc.'s LEP population, Cortland County Community Action Program, Inc.'s will utilize readily available resources, in addition to other avenues, to not only minimize costs, but to strengthen our partnership with other organizations our clients/riders engage with. Some of those readily available resources may include bilingual staff; the inclusion of Google translate toolbar to our website; the Cortland County Chamber of Commerce services; and the County office of community engagement personnel. To supplement these resources, Cortland County Community Action Program, Inc.'s also retains the services of a professional interpretation service. After analyzing the Cortland County Community Action Program, Inc.'s budget and reviewing available resources, cost associated to meet language assistance needs of the LEP population will be incurred for retaining an interpreter and translating vital documents.

### ***Providing Language Assistance Services***

Cortland County Community Action Program, Inc.'s currently meets the language assistance needs of the Spanish-speaking population through the services of an interpreter, including Google translate on our website, accessing community organizations that meet the needs of Spanish-speaking population, and our multilingual staff. As needed, key documents are translated to Spanish, meeting the threshold for translation of such materials.

### ***Informing LEP Populations of the Availability of Language Assistance***

Language assistance is advertised on our website, on the Title VI notice, through posters in our agency, and through program registration materials, as applicable. Cortland County Community Action Program, Inc.'s also utilizes community-based organizations to share the availability of these services, public meetings, rider surveys and interviews, outreach documents, and on vehicles.

Cortland County Community Action Program, Inc.'s annually identifies the language capabilities and language assistance needs of our ridership. Should Cortland County Community Action Program, Inc.'s have more than 5% of persons in a specific language group that requires language assistance, Cortland County Community Action Program, Inc.'s shall comply with the

US Department of Justice Safe Harbor Provision and provide written material in the specific language and or oral interpretation of the written material, free of cost.

### ***Updating the Language Assistance Plan***

The Cortland County Community Action Program, Inc.'s will monitor the effectiveness of the language assistance to determine if enhancements on the methods (translating vital documents, interpretations and website) is required to better communicate with the LEP population. As a part of this process, the Cortland County Community Action Program, Inc.'s will incorporate components that encourages feedback from customers on their experience with the implementation of the Language Assistance Plan. Based on the input received, Cortland County Community Action Program, Inc.'s will make any immediate critical updates that can be feasibly implemented and document others for the triennial update of the Title VI Plan. Consequently, if there are updates to the Language Assistance Plan within the Human Service – Public Transportation Coordination Plan, Cortland County Community Action Program, Inc.'s will review such updates and identify those with impact on components germane to its own Language Assistance Plan. Critical updates that can be feasibly implemented, will be immediately incorporated.

### ***Training Employees to Provide Language Assistance***

Cortland County Community Action Program, Inc.'s employees are oriented on the principles of Title VI and language assistance. New employees will be provided guidance on the needs of clients served and how best to meet their language needs. Refresher training will be completed with the triennial Title VI Plan update. Reminders on the importance of Title VI and the Language Assistance Plan will be distributed through email. Training will include review of the following Title VI program components:

1. Title VI Notice to the Public
2. Title VI complaint procedures and form
3. Complaint log
4. LEP (Four Factor Analysis and Language Assistance Plan)

If an employee needs further assistance related to LEP individuals, they will work with the Cortland County Community Action Program, Inc.'s's Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.

## **B7. Minority Representation on Advisory Boards**

Cortland County Community Action Program, Inc.'s has no transit-related, non-elected committees or advisory councils.

### ***Efforts to Encourage Minority Representation on Boards and Committees***

The Cortland County Community Action Program, Inc.'s understands diverse representation on committees, councils and boards results in sound policy reflective of its entire service area. As such, the Cortland County Community Action Program, Inc.'s encourages participation of all its clientele/patrons and interested parties on boards, committees or councils.

As vacancies on boards, committees, and councils become available, the Cortland County Community Action Program, Inc.'s will make efforts to encourage and promote diversity with active participation of clientele/patrons, community organizations and interested parties. Cortland County Community Action Program, Inc.'s contacts advocates of the minority

community, such as organizations that serve minority communities and leaders to garner interest in participating onboards, committees or councils.

## B8. Recordkeeping and Reporting

Cortland County Community Action Program, Inc.'s maintains records related to the agency's implementation of Title VI program, including records of the Title VI Plan Board adoption, records of Title VI staff training, public involvement activities, complaints, investigations, language assistance services and other implementation activities.

Cortland County Community Action Program, Inc.'s shall update the Title VI Plan, every three years and submit the plan to the New York State Department of Transportation (NYSDOT) for approval.

## B9. Plan and Policy Review

The Title VI policy will be disseminated to employees through new employee orientation and periodic email messages. The Cortland County Community Action Program, Inc.'s will review its Title VI Plan at least once every three years to determine if modifications are necessary. The Cortland County Community Action Program, Inc.'s directly operates services and subcontracts the operation of some services and will review implementation annually to ensure compliance with Title VI Plan requirements. The agency's review includes verifying that all employees have received ongoing updates, training, and a copy of the Title VI policies and that all postings are in place and in good condition.

### ***Title VI Plan Monitoring – Activity Log***

<b>Date</b>	<b>Activity</b> (Review-Update- Addendum- Adoption- Distribution)	<b>Person Responsible</b>	<b>Remarks</b>
March 31, 2025	Adopted and distributed	<b>Kirsten Parker</b> , Compliance Officer & Deputy Director	Board of Directors review & approval. Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
March 31, 2026	Annual review of implementation	<b>Kirsten Parker</b> , Compliance Officer & Deputy Director	Review the entire plan for updates, changes, additions, etc. Verify all new employees receive training and copies of Title VI policy. Verify intake materials and postings.
March 31, 2028	Updated plan, adopted and distributed	<b>Kirsten Parker</b> , Compliance Officer & Deputy Director	Tri-annual review of Plan with updates. Board of Directors review & approval. Verify all employees receive training and copies of Title VI policy. Verify intake materials, postings



## **Program Monitoring**

The Cortland County Community Action Program, Inc.'s will monitor the effectiveness of the Title VI program through the feedback from clientele, employees, general public and other agencies (NYSDOT, FTA). Cortland County Community Action Program, Inc.'s seeks opportunities to continuously improve its Title VI plan, public participation outreach efforts and providing meaningful access of our services to LEP individuals.

## **B10. Facility Location Equity Analysis**

As a subrecipient of federal funds, Cortland County Community Action Program, Inc.'s understands we are required to conduct a Title VI equity analysis when planning to construct, expand, or purchase a facility. A facility includes storage facilities, maintenance facilities, and operations centers, but it does not include bus shelters, transit stations, or power substations. The equity analysis requirement applies even to facilities that do not receive direct federal funding (as long as Cortland County Community Action Program, Inc.'s receives federal financial assistance, Title VI requirements apply to all programs and activities). The equity analysis compares the equity impacts of various siting alternatives and must occur during the planning phase, prior to the selection of the preferred site, and must include the following:

1. A description of the outreach to persons potentially impacted.
2. A comparison of equity impacts of various siting alternatives.
3. An analysis about whether a disparate impact occurs on the basis of race, color or national origin (including potential cumulative adverse impacts from other facilities with similar impacts in the area) because of the location and construction of a facility. (If there is a disparate impact, the construction of the facility may only occur if there is a substantial legitimate justification, there are no alternative locations that would have a less disparate impact, and it is not a pretext for discrimination).

For any new facility construction, expansion, or acquisition, Cortland County Community Action Program, Inc.'s will work with NYSDOT to ensure that the equity analysis is completed and submitted to NYSDOT. The equity analysis will be provided upon request to NYSDOT, FTA and during the triennial review.

The below is intended to provide direction to the reader as to whether Cortland County Community Action Program, Inc.'s was required to, completed, and included a Title VI equity analysis with this Title VI Plan update.

Did Cortland County Community Action Program, Inc.'s construct, expand or acquired a facility in the past three years?

☒ **No.** Cortland County Community Action Program, Inc.'s has not constructed, expanded or acquired a facility.

☐ **Yes.** Cortland County Community Action Program, Inc.'s did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

Does Cortland County Community Action Program, Inc.'s plan to construct, expand or acquire a facility in the next three years? (*check the box next to the appropriate response below*)

☒ **No.** Cortland County Community Action Program, Inc.'s does not plan to construct, expand or acquire a facility.

☐ **Yes.** Cortland County Community Action Program, Inc.'s plans to (construct, expand or acquire) a facility.

If yes, was a Title VI equity analysis completed?

☐ **Yes.** A Title VI equity analysis was completed. If relevant, a copy of the analysis is included as **Appendices**.

☒ **No.** A Title VI equity analysis was not completed.

If no, when will the Title VI equity analysis be completed?

N/A

## C. REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

- Not applicable for transportation services provided by the Cortland County Community Action Program, Inc.



## **D. LIST OF APPENDICES**

- A. Documentation of Board Approval
- B. Title VI Complaint Form
- C. Letter Acknowledging Receipt of Title VI Complaint
- D. Title VI Complaint Letter of Closure
- E. Title VI Complaint Letter of Finding
- F. Title VI Notice to the Public

## **APPENDIX A: Documentation of Board Approval**

## Cortland County Community Action Program, Inc.'s Title VI Plan Board Approval

On behalf of the Cortland County Community Action Program, Inc., we the Board of Directors have reviewed and adopted the Cortland County Community Action Program, Inc.'s Title VI plan. We the Board are committed to ensuring that all decisions are made in accordance with the adopted Title VI plan, to that end no person is excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination under any Cortland County Community Action Program, Inc.'s services and activities based on race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964 and Federal Transit law under Title 49 Part 21.

**Effective:** February 27, 2025

**Adopted:** February 27, 2025

**Adopted By:** CAPCO Board of Directors  
Doug Bentley, Treasurer & Officer of the Board

*Resolution of the Board of Directors*

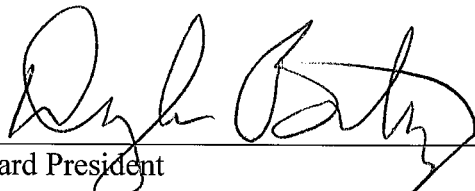
*Of*

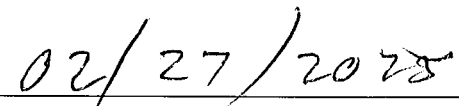
*Cortland County Community Action Program, Inc.*

**Resolution No. 25-23**

**WHEREAS**, the Cortland County Community Action Program, Inc. Board of Directors has reviewed the proposed the Title VI Plan for the NYSDOT 5310 grant operations,

**IT IS HEREBY RESOLVED** that on February 27, 2025, the Cortland County Community Action Program, Inc. Board of Directors accepts as presented the Title VI Plan for the NYSDOT 5310 grant operations.

  
\_\_\_\_\_  
Board President

  
\_\_\_\_\_  
Date

## **APPENDIX B: Title VI Complaint Form**



## Cortland County Community Action Program, Inc.'s Title VI and ADA Complaint Form

Section I:				
Your Name:				
Address:				
Telephone (Home):			Telephone (Work/Mobile):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
<i>*If you answered "yes" to this question, go to Section III.</i>				
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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability				
Date of Alleged Discrimination (Month, Day, Year): _____				
Agency name complaint is against: _____				
Location of where the alleged discrimination occurred:- _____				
<b>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 additional pages.</b>				

Section IV	
<p><b>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>If yes, check all that apply:</i></p> <p><input type="checkbox"/> Federal Agency: _____</p> <p><input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____</p> <p><input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____</p>	
<p><b>Provide information for the contact person at the agency/court where the complaint was filed.</b></p>	
<p><b>Name and Title:</b></p> <p>_____</p>	
<p><b>Agency:</b></p> <p>_____</p>	
<p><b>Address:</b></p> <p>_____</p>	
<p><b>Telephone:</b></p> <p>_____</p>	

**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 by mail, email or in person to the address below.**

Cortland County Community Action Program, Inc.'s  
 Danielle Treacy-Title VI/ADA Coordinator  
 32 N. Main Street  
 Cortland, NY 13045  
 daniellet@capco.org

*This complaint may also be filed directly with the New York State Department of Transportation, Office of Civil Rights, 50 Wolf Road, 6th Floor, Albany, NY 12232, (518) 457-1129 Fax (518) 549-1273, OCR-TitleVI@dot.ny.gov or the 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 C: Letter Acknowledging Receipt of Complaint**





**Date**

**Name**

**Address**

**City, State Zip**

Dear **Name**:

This letter is to acknowledge receipt of your Title VI complaint against Cortland County Community Action Program, Inc. alleging

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An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by contacting our office at (607) 753-6781 or in writing to Cortland County Community Action Program, Inc. , 32 N. Main St, Cortland, NY 13045, or [daniellet@capco.org](mailto:daniellet@capco.org).

Sincerely,

**Danielle Treacy**  
**Title VI Coordinator**  
**32 N. Main Street, Cortland, NY 13045**  
**(607) 753-6781**  
**[daniellet@capco.org](mailto:daniellet@capco.org)**

## **APPENDIX D: Title VI Complaint Letter of Closure**



**Date**

**Name**

**Address**

**City, State Zip**

Dear **Name**:

The matter referenced in your Title VI complaint dated \_\_\_\_\_ against the Cortland County Community Action Program, Inc. alleging:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

has been investigated. 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.

Cortland County Community Action Program, Inc. has analyzed the materials and facts pertaining to your case. There was no evidence identified that a violation of your Title VI rights were denied. I therefore advise you that your complaint was not substantiated and that I am closing the matter in our files.

You have the right to 1) provide additional information to this office for reconsideration of your complaint within seven (7) calendar days of receipt of this final written decision and/or 2) file a complaint externally with the Federal Transit Administration 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. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

**Danielle Treacy  
Title VI Coordinator  
32 N. Main Street, Cortland, NY 13045  
(607) 753-6781  
daniellet@capco.org**

## **APPENDIX E: Title VI Complaint Letter of Finding**



**Date**

**Name**

**Address**

**City, State Zip**

Dear **Name**:

The matter referenced in your letter dated \_\_\_\_\_, against the Cortland County Community Action Program, Inc. alleging Title VI violation has been investigated. The investigation determined non-compliance by Cortland County Community Action Program, Inc. in administering the Title VI obligations of nondiscrimination in the programs and services we administer. Immediate efforts are underway to correct the findings.

Thank you for bringing this important matter to our attention. You were extremely helpful during our review of the program to correct our implementation of the Title VI Program. If I can be of assistance to you in the future, do not hesitate to call me at 607-753-6781.

Sincerely,

**Danielle Treacy**  
**Title VI Coordinator**  
**32 N. Main Street, Cortland, NY 13045**  
**(607) 753-6781**  
**daniellet@capco.org**

## **APPENDIX F: Title VI Notice to the Public**



## Notifying the Public of Rights under Title VI and the ADA

### Cortland County Community Action Program, Inc.'s

The **Cortland County Community Action Program, Inc.'s** operates its programs and services without regard to race, color, and national origin, in accordance with Title VI of the Civil Rights Act of 1964, and for persons with disabilities under the Americans with Disabilities Act of 1990. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI or the ADA may file a complaint with the **Cortland County Community Action Program, Inc.'s**.

For more information on the **Cortland County Community Action Program, Inc.'s** program, and the obligations and procedures to file a complaint, **contact (607)-753-6781; email [daniellet@capco.org](mailto:daniellet@capco.org)**; or visit our office at **Cortland County Community Action Program, Inc.'s, 32 N. Main Street, Cortland, NY 13045**. For more information on how to contact **Cortland County Community Action Program, Inc.'s** to find out about Title VI, visit **[www.capco.org](http://www.capco.org)**.

A complainant may file a complaint directly with **Cortland County Community Action Program, Inc.'s** TITLE VI Coordinator by following the **Cortland County Community Action Program, Inc.'s** complaint procedures also found on the agency's website. A complaint can also be filed with the New York State Department of Transportation on its Civil Rights website at <https://www.dot.ny.gov/main/business-center/civil-rights/title-vi-ej>. Finally, a complaint can be filed directly with the 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.

If information is needed in another language, contact **(607)-753-6781**.

*Si necesita información en otra idioma, por favor contacto (607)-753-6781.*