

**POLICY & PROCEDURE NOTICE
6/2018-2**

DIVISION: Program & Services
ISSURANCE DATE: June 28, 2018
EFFECTIVE DATE: Immediately Upon Approval
SUBJECT: Title VI & ADA Program Plan

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SUMMARY POLICY STATEMENT

Community Resources as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New York Department of Transportation (NYSDOT) 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

POLICY UPDATES & ACTIVITY LOG

Community Resources will review its policy at least once every three years to determine if modifications are necessary.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks

TITLE VI NOTICE TO THE PUBLIC

Community Resources' Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

COMMUNITY RESOURCES

- ✓ Community Resources 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 and ADA may file a complaint with Community Resources.
- ✓ For more information on Community Resources' civil rights program, and the procedures to file a complaint, contact 718-720-4799 email title.vi.complaint@cr-si.org or visit our administrative office at Community Resources, 3450 Victory Boulevard, Staten Island, NY 10314. For more information, visit www.cr-si.org
- ✓ 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 718.447.5200 ext. 224.
Si se necesita informacion en otro idioma de contacto, 718.447.5200 ext. 224

Community Resource's Notice to the Public is posted in the following locations: (*check all that apply*)

- Agency website at www.cr-si.org
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Inside Agency vehicles

TITLE VI & ADA COMPLAINT PROCEDURE

Community Resource's Title VI and ADA Complaint Procedure is made available in the following locations: (*check or list all that apply*)

- Agency website, either as a reference in the Notice to Public
- Hard copy in the Central Office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

1. Any person who believes she or he has been discriminated against on the basis of race, color, national origin or disabilities by Community Resources may file a Title VI Complaint by completing and submitting the agency's Title VI Complaint Form.
2. Community Resources investigates complaints received no more than 180 days after the alleged incident. Community Resources will process complaints that are complete.
3. Once the complaint is received, Community Resources will review it 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.
4. Community Resources has 30 days to investigate the complaint. If more information is needed to resolve the case, the agency may contact the complainant.
5. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. The agency's clock on 30 day timeframe indicated under statement #4 will stop while it awaits response from the complainant and begin upon receiving the requested information in full.
6. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the agency can administratively close the case. Also, a case can be administratively closed also if the complainant no longer wishes to pursue their case.
7. After the investigator reviews the complaint, she/he will issue one of two (2) 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 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.
8. 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.
9. 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, contact 718.447.5200 ext. 224.
Si se necesita informacion en otro idioma de contacto, 718.447.5200 ext. 224

TITLE VI & ADA COMPLAINT FORM

Community Resource's Title VI Complaint Procedure is made available in the following locations: *(check or list all that apply)*

- Agency website, either as a reference in the Notice to Public
- Hard copy in the Central Office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic 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):				
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> National Origin
<input type="checkbox"/> Disability				
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 use the back of this form or attach additional pages.				

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?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone 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:

Corporate Compliance
 3450 Victory Boulevard
 Staten Island, NY 10314

TITLE VI & ADA INVESTIGATIONS, COMPLAINTS AND LAWSUITS

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

Check One:

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

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

PUBLIC PARTICIPATION PLAN

Strategies and Desired Outcomes

Community Resources (CR) serves only clients that have been determined eligible by the New York State Office for People With Developmental Disabilities (OPWDD). As a State agency, OPWDD complies with all Title VI requirements in the development of their programs. Community Resources serves all individuals who are determined by OPWDD to be eligible for services, without regard to race, color, or national origin.

CR works with the families and guardians of the people its serves to assure that services meet their needs. CR maintains an open door policy with friends and families of our consumers, and the general public. Additionally, we regularly meet with families and other supports systems for the people we serve at least two times a year. While CR includes information on Title VI and the ADA in application and orientation materials, it does not conduct a public outreach process as OPWDD serves as the "front door" for determining who is eligible for service.

Public Outreach Activities

Community Resources maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, Community Resources will review its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by Community Resources are summarized in the table below. Efforts include meetings, surveys, attendance at programs events, etc.

Event Date	Name of Agency Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes
		Gala			
		Mother, Daughter, & Friend Brunch			
		Pasta Ball			
		House Party			

Community Resources

LANGUAGE ASSISTANCE PLAN

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1 – Demography

Community Resources provides its own transportation service tailored to the population it serves.

The US Census Bureau – American Fact Finder (2012-2016) reports there are numerous languages spoken in 10314 Zip Code of Staten Island, New York. Some of these languages include Spanish, Asian Indian, Chinese, Filipino, and Korean. After English, the second largest language group is Spanish at 14.3% and Asian at 14.0%¹.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. 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), Community Resources must provide translation of vital documents in written format for non-English speaking persons.

In Staten Island Zip Code 10314, out of a population of 88,585, an estimate of 12,423 persons have identified themselves as Asian (Asian India, Chinese, Filipino, and Korean) and “speaks English less than well” while an estimated 12,650 have identified themselves as Spanish speaking and “speaks English less than well.” These two language groups make up more the 5% or 1,000 person threshold of the population to be served. This means Community Resources is required to provide written translation of vital documents. All the other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, Community Resources is also not required to provide written translation of vital documents in these languages.

In the future, if Community Resources meets the Safe Harbor Threshold for an additional language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Factor 2 – Frequency

Community Resources staff will be trained on what to do when they encounter a person that speaks English less than well. Community Resources will track the number of encounters and consider making adjustments as needed to its contact with the public to ensure meaningful access to all persons with disabilities, and specifically to LEP and minority populations of Community Resources’ programs and services.

¹ <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow-up Required	Staff Member Providing Assistance	Notes

Community Resources transportation department provides rides to more than 300 person per year on at least over 8,320 trip. While formal data has not been collected, our transportation coordinator has not indicated it has encountered any LEP persons using the service within the last six months.

Community Resources has an open door policy and will provide rides to any persons within our services regardless of LEP status or ADA challenges. If an individual has speech limitations, the dispatcher or driver will work with the Transportation Coordinator to ensure the individual receives access to the transportation service.

The "I Speak" Language identification card listed below is a document that can be placed in our vehicles and used by Community Resources staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of Community Resources' service area.

"I Speak" Language Identification Card

Mark this Box if you speak	Language Identification Chart	Language
<input type="checkbox"/>	Mark this box if you read or speak English	English
<input type="checkbox"/>	Marque esta casilla si lee o habla español	Spanish
<input type="checkbox"/>	如果说中国在方框内打勾	Chinese
<input type="checkbox"/>	Xin hiaunh daáu vaøo oâ naøy neáu quyù vò bieát ñoic vaø noùi ñoøic Vieät Ngöø.	Vietnamese
<input type="checkbox"/>	당신이한국어말할경우이 상자를표시	Korean
<input type="checkbox"/>	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
<input type="checkbox"/>	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Factor 3 – Importance

Community Resources understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. Cr transportation system is a key link to connecting LEP persons to these essential services.

Community Resources has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities and vehicles and providing information to the public on security awareness or emergency preparedness.

Factor 4 – Resources and Costs

Even though Community Resources does not have a separate budget for LEP outreach, low cost methods of reaching LEP persons have been implemented. While CR includes information on Title VI and the ADA in application and orientation materials, it does not conduct a public outreach process as OPWDD serves as the “front door” for determining who is eligible for service.

Training of CR staff as to Title VI and LEP requirements is conducted internally. At this point, no additional training costs are incurred with the exception of printing/photocopying materials.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

Community Resources has several bilingual speaking persons on staff. In addition, we work with our transit provider/lessee to ensure mechanisms are in place to reach LEP persons in the service area.

In addition, Community Resources has developed relationships as well as contracted with a telephonic translation services to use a resource to assist the agency in meeting the need of LEP persons, if needed.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

Community Resources does the following to inform LEP persons of the availability of language assistance services:

- ✓ Publish a timetable and route map in Spanish on information leaflets
- ✓ Utilize the bilingual speaking person on staff to assist with the development of bilingual information
- ✓ Prioritize the hiring of bilingual staff, as needed

Community Resources and our transit provider/lessee uses a variety of low cost outreach methods such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Community Resources reviews its plan on an annual basis or more frequently as needed. In particular, Community Resources 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.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Community Resources employees are oriented on the principles of Title VI and Community Resources' Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.

If a driver, dispatcher or employee needs further assistance related to LEP individuals, her/she will work with Community Resources' to identify strategies to meet the language needs of the participants of the program or service.

Adopted by: Community Resources Board of Directors Executive Committee

Revised on: October 24, 2018

This policy is hereby adopted and signed by:

Community Resources, Inc.

Executive Name/Title:

Executive Signature:

Sana T. Magee CEO
[Handwritten Signature]