



Colonie Senior Service Centers, Inc.

TITLE VI Plan

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PROGRAM DESCRIPTION AND SERVICES

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."

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. Colonie Senior Service Centers, Inc. is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how CSSC, Inc. incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

CSSC, Inc. is a nonprofit who primarily receives program funds from ACCESS Transit, a subsidiary of Capital District Transportation Authority, and receives FTA Section 5310 funding through NYSDOT to acquire transit vans and small buses for clients in one of our four housing buildings and Town of Colonie residents who come to our social model day program. Transportation is provided Monday through Friday between the hours of 8:00 a.m.-4:00 p.m. and requires advanced scheduling. Services include transportation to and from social model day programs, grocery, medical, dialysis, pharmacy, congregate dining, and services are provided on a suggested donation of \$5.00 each way.

COLONIE SENIOR SERVICE CENTERS, INC. TITLE VI PLAN

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 funds, CSSC, Inc. 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 of 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.)

CSSC, Inc. shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

B1. COLONIE SENIOR SERVICE CENTERS, INC. TITLE VI POLICY

Colonie Senior Service Centers, Inc. 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 CSSC, Inc. and NYSDOT and third-party contractors.

For more information on CSSC, Inc.'s Title VI program contact:

Title VI Coordinator

Colonie Senior Service Centers, Inc.

Carol Ripley

6 Winners Circle

Albany, NY 12205

Phone (518) 459-2857

cripley@coloneseniors.org

B2. TITLE VI PUBLIC NOTICE

CSSC, Inc.'s Notice to the Public is posted in the following locations:

- ✓ Agency website at: <https://www.colonieseniors.org>
- ✓ Public areas of the agency office (CSSC, Inc. South Lobby & Transportation Office)
- ✓ Inside transit vehicles

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



The Colonie Senior Service Centers, Inc. 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. Colonie Senior Service Centers, 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 CSSC, Inc.

For information on CSSC, Inc.'s Title VI policy or to obtain the Title VI complaint form and procedures visit our website at: www.colonieseniors.org. Or contact:

Colonie Senior Service Centers
Carol Ripley
Title VI Coordinator
6 Winners Circle
Albany, NY 12205
Phone (518) 459-2857
cripley@coloneseniors.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](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, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, DC, 20590

For information in another language, please contact the Title VI Coordinator at: (518) 459-2857.

Si necesita información en otro idioma, por favor contacto: (518) 459-2857.

B3. TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

Colonie Senior Service Centers, Inc.'s Title VI Complaint Procedure is available in the following locations:

- ✓ Agency website at: <https://www.colonieseniors.org>
- ✓ Hard copy in the central office

Anyone who believes they have been discriminated against based on 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.

Colonie Senior Service Centers
Carol Ripley
Title VI Coordinator
6 Winners Circle
Albany, NY 12205
Phone (518) 459-2857
cripley@coloneseniors.org

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

CSSC, Inc. investigates complaints received no more than 180 days after the alleged incident. Once the complaint is received, CSSC, Inc. will follow the steps below:

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if CSSC, Inc. has jurisdiction to investigate the complaint.
3. Complete the investigation within 45 days. Schedule an interview, if deemed necessary.
4. Determine if other public or private entities are or should be involved.
5. Determine if additional information is needed. Complainant has 15 days to provide additional information.
6. If CSSC, Inc. is not contacted by the complainant or does not receive 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.
7. Determine if meetings with the affected party or other interested parties are needed.

After the investigative process has been completed, the Colonie Senior Service Centers, Inc. 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 would 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 members, 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 letter of the closure or the LOF.

Filing complaints with CSSC, Inc. 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
Phone: (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, contact CSSC, Inc. at: (518) 459-2857.

Si necesita información en otra idioma, por favor contacto: (518) 459-2857.

B4. TRANSIT RELATED TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS

Colonie Senior Service Centers, Inc. 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's name. A case number is preferable.)

Reporting Period:

July 1st 2022 - June 30st 2023

July 1st 2023 - June 30st 2024

July 1st 2024 - June 30st 2025

Check One:

☒

There have been no investigations, complaints and/or lawsuits filed against CSSC, Inc. during the reporting period.

☐

There have been investigations, complaints and/or lawsuits filed against CSSC, Inc. *See list below.*

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

B5. Public Involvement Process

Strategies and Desired Outcomes

Colonie Senior Service Centers, Inc. 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.

CSSC, Inc. primarily serves only clients that have been determined to be eligible for our transit service by ACCESS-Transit, a subsidiary of Capital District Transportation Authority (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. CSSC, Inc. 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

Colonie Senior Service Centers, Inc. (CSSC) is a closed-door transportation service that receives funding from ACCESS Transit (subsidiary to CDTA). If you live in one of CSSC's four buildings clients call CSSC directly to arrange for rides.

- Coordination with community, faith-based organizations, disability advocacy organizations, chambers of commerce, educational institutions, senior centers, senior housing facilities, etc.
- Direct mailings of our monthly newsletter, Senior Connections
- Organization Facebook page and Colonieseniors.org website
- Participation in senior trade shows, expos, and fairs
- Press releases monthly in the Colonie Spotlight newspaper

If there are changes in schedules and/or events, CSSC calls all clients scheduled for transportation that day. CSSC also has a standing rule that if the South Colonie schools are closed due to inclement weather, the CSSC does not provide transportation that day. Information is sent to various news outlets so that closure is broadcast on television as well.

Clients are required to re-register with CSSC on an annual basis to use our transportation services. After the initial registration is completed, CSSC staff call each client to get them re-registered for the upcoming year.

CSSC Inc.'s decision-making public involvement program is limited to the population that meets the eligibility criteria set by 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 (Capital District Transit Authority-ACCESS,) that provide services to minorities, low income and LEP communities.

CSSC, Inc. assists Funder when clients call us for rides. 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

CSSC, Inc. is a closed-door service provider so traditional public involvement activities are not applicable. However, CSSC, Inc. maintains information on its website and actively works with community organizations regarding its commitment to serving all people regardless of race, color, or national origin.

B6. Language Assistance Plan

Language Assistance Plan Components

Limited English Proficient (LEP) persons are people for whom English is not their 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, Colonie Senior Service Centers, Inc. will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons. CSSC, Inc. Language Assistance Plan considers the following factors:

LEP Four Factor Analysis

To determine what specific languages are spoken in our transit service area and to determine what language services are appropriate for the LEP population, the CSSC, Inc. has conducted a Four Factor Analysis: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs. Our analysis is based on internal client registration data for our transportation services.

Factor 1–Demography | Number or proportion of the LEP population(s), specifically served or could be served by CSSC, Inc. transit service.

CSSC, Inc. clients and potential clients are seniors over the age of 60 and individuals with disabilities. When our clients register for our transportation services, they provide information such as address, emergency contact, and mobility aids used (i.e., canes, walkers, or wheelchairs). Through partnering with organizations such as Refugees & Immigrants Support Services of Emmaus United Methodist Church (RISSE) and U.S. Committee for Refugees and Immigrants (USCRI), CSSC, Inc ensures limited English proficiency populations have access to transportation services. The review of our internal client data shows that only four current clients who use our transportation services speak English less than very well. Those clients speak Farsi and Burmese. Our agency prioritizes inclusive communication and relies on these partnerships to support clients who may need language assistance.

Factor 2–Frequency | Frequency with which LEP people encounter CSSC, Inc.

CSSC holds an English as a Second Language class two days a week and we provided transportation to those four clients who participate in this class. They come to our building for the two-hour class and then stay for the congregate lunch, allowing for socialization and a chance to use their English skills.

Factor 3–Importance | Importance of the service to clients who need language assistance

CSSC, Inc services are critical to the lives of its clients. CSSC, Inc. has taken positive steps at the intake process to identify non-English speaking clients through our partnerships. Through that relationship, we can provide oral interpretation for clients we have regular contact with and new clients wishing to use our services.

Factor 4 Resources and Costs | Resources available and employee training

CSSC, Inc. provides the principles on Title VI and language assistance with an emphasis that the clients are protected under Title VI and LEP. Our employees use our partnerships to meet the needs of our clientele and the LEP individual. CSSC, Inc. has adequate resources to provide employee training. Oral interpretation for the client is provided at no cost to the client.

Implementing the Language Assistance Plan

As a result of the four-factor analysis, a Language Assistance Plan is not required. However, attempts are always made to accommodate any person who requires written translation or oral interpretation services. During the registration process, CSSC can identify non-English speaking clients (or children, or guardians of our clients) with whom we have contact. We have language assistance tools or staff available to provide oral interpretation. The Language Assistance Plan will be monitored annually for any language assistance change. If no change occurs, the Language Assistance Program will at a minimum be updated during the Title VI plan update.

B7. Minority Representation on Advisory Boards

Colonie Senior Service Centers, Inc. has no transit-related, non-elected committees or advisory councils.

B8. Recordkeeping and Reporting

Colonie Senior Service Centers, Inc. 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.

CSSC, Inc. 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 annual training. Colonie Senior Service Centers, Inc. will review its Title VI Plan at least once every three years to determine if modifications are necessary. CSSC, Inc. directly operates 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

Date	Activity (Review-Update- Addendum- Adoption- Distribution)	Person Responsible	Remarks
Sept 20, 2023	Adopted and distributed	Carol Ripley	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
December 31, 2024	Annual review of implementation	Carol Ripley	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
July 30, 2025	Annual review of implementation	Carol Ripley	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.

Program Monitoring

CSSC, Inc. will monitor the effectiveness of the Title VI program through feedback from clientele, employees, public and other agencies (NYSDOT, FTA).

CSSC, Inc. seeks opportunities to continuously improve its Title VI plan, public participation outreach efforts and providing meaningful access to our services to LEP individuals.

B10. Facility Location Equity Analysis

As a subrecipient of federal funds, Colonie Senior Service Centers, Inc. understands we are required to conduct a Title VI equity analysis when planning to construct, expand, or purchase a facility. The 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 (if CSSC, Inc. 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 potentially impacted people.
2. A comparison of equity impacts of various siting alternatives.
3. An analysis about whether a disparate impact occurs based on 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, CSSC, Inc. 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 directions to the reader as to whether CSSC, Inc. was required to complete and include a Title VI equity analysis with this Title VI Plan update.

Did CSSC, Inc. construct, expand or acquire a facility in the past three years?

☒ **No.** CSSC, Inc. has not constructed, expanded or acquired a facility.

☐ **Yes.** CSSC, Inc. did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

Does Colonie Senior Service Centers, Inc. plan to construct, expand or acquire a facility in the next three years? (check the box next to the appropriate response below)

☒ **No.** CSSC, Inc. does not plan to construct, expand or acquire a facility.

☐ **Yes.** CSSC, Inc. plans to (construct, expand or acquire) a facility.

If yes, was a Title VI equity analysis completed?

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

☐

Yes. A Title VI equity analysis was completed. A copy of the analysis is included as Appendix X

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