

Aspire of WNY TITLE VI Plan

January 10, 2025

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A. 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 states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

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 nondiscriminatory manner. Aspire of WNY is a sub-recipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how Aspire of WNY incorporates nondiscrimination policies and practices in providing transit services to our ridership.

Aspire of WNY is a nonprofit that receives FTA Section 5310 funding through NYSDOT to provide closed-door transit services to only individuals certified by the New York Office for People with Developmental Disabilities (OPWDD). Aspire of WNY operates from 7 AM to 7 PM Monday – Saturday. Aspire of WNY is located at 2356 North Forest Rd. Getzville, NY 14068. Aspire of WNY has been serving OPWDD clientele since 2005, fare-free.

ASPIRE OF WNY Title VI Plan

As a sub-recipient to NYSDOT receiving Federal Transit Administration Section 5310, Aspire of WNY 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 sub-recipient, 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, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved by the Title VI Program. The approval must occur before submission to NYSDOT. (Board approval is not required if the sub-recipient does not have a Board.)

Aspire of WNY shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

A1. Aspire of WNY TITLE VI Policy

Aspire of WNY commits to comply with Title VI of the Civil Rights Act of 1964, which 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 Aspire of WNY and NYSDOT and third-party contractors.

For more information on Aspire of WNY's Title VI program contact:

Title VI Coordinator
Aspire of WNY
VP of Quality/Compliance Officer
2356 North Forest Rd
Getzville, New York 14068
Phone (716) 505-5671
MLDodson@aspirewny.org

A2. Title VI Public Notice

The Aspire of WNY's Notice to the Public is posted in the following locations:

- Agency website at: www.aspirewny.org
- Public areas of the Environment and Safety/Transportation office at 3330 Clinton St. West Seneca, NY 14224
- Inside transit vehicles

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

Aspire of WNY 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. Aspire of WNY 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 Aspire of WNY.

For information on Aspire of WNY's Title VI policy or to obtain the Title VI complaint form and procedures, visit our website at www.aspirewny.org. Or contact:

Title VI Coordinator
Aspire of WNY
2356 North Forest Rd
Getzville, NY 14068
716-505-5671
MLDodson@aspirewny.org

A complainant may also file a complaint directly 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>.

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.

A3. Title VI Complaint Procedures and Complaint Form

Aspire of WNY's Title VI Complaint Procedure is available in the following locations:

- Agency website at: www.aspirewny.com
- Hard copy in the central office
- In client intake materials
- Other (describe)

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.

Aspire of WNY
Title VI Coordinator
2356 North Forest Rd.
Getzville, NY 14068
716-505-5671

The complaint form is not required to file a complaint. The complainant may submit any written report as a complaint notice. Aspire of WNY will make reasonable modifications and take verbal information if the complainant requires this accommodation.

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

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if Aspire of WNY 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. The complainant has 15 days to provide the additional information.
7. If Aspire of WNY 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.
8. Determine if meetings with the affected party or other interested parties are needed.

After the investigative process has been completed, Aspire of WNY 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 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 letter of closure or the LOF.

Filing complaints with Aspire of WNY enables the agency to investigate the complaint properly. 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 Aspire of WNY at 716-505-5671.

A4. Transit Related Title VI Complaints, Investigations and Lawsuits

Aspire of WNY 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:

12/31/2025

12/31/2026

12/31/2027

Check One:

There have been no investigations, complaints and/or lawsuits filed against Aspire of WNY during the reporting period.

There have been investigations, complaints and/or lawsuits filed against Aspire of WNY. *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. | | | | |
| Lawsuit | | | | |
| 1. | | | | |
| 2. | | | | |
| 3. | | | | |

A5. Public Involvement Process

Strategies and Desired Outcomes

This section describes how Aspire of WNY 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.

Aspire of WNY primarily serves only clients who have been determined to be eligible for our transit service by The Office for People with Developmental Disabilities (Funder). The Funder, as a recipient of federal financial assistance, must comply with all Title VI requirements in the development and delivery of its programs. Aspire of WNY serves all individuals who the Funder determines to be eligible for services, regardless of race, color, or national origin and low-income status.

Public Outreach Activities

Aspire of WNY's program decision-making public involvement is limited to the population that meets the eligibility criteria set by the Office for People with Developmental Disabilities (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. The Funder outreach consists of relationship building with agencies and stakeholders (such as individuals supported, family members, and the community) that provide services to minority, low-income, and LEP communities

Aspire of WNY 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 of Public Involvement Activity

Since the last Title VI plan update, Aspire of WNY conducted the following public involvement outreach (emails, website posting, media outlets, in-person, virtual) sessions:

- Not applicable; Aspire of WNY is a closed-door service provider.

A6. Language Assistance Plan

Language Assistance Plan Components

Limited English Proficient (LEP) persons are people for whom English is not their primary language and 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, Aspire of WNY will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons. Aspire of WNY's Language Assistance Plan considers the following factors:

A number or proportion of the LEP population(s) specifically served, or that could be served by Aspire of WNY transit service.

The frequency with which LEP persons come into contact with Aspire of WNY.

The nature and importance of Aspire of WNY transit services to LEP population(s).

The resources available for LEP outreach and how employees are trained to provide language assistance to LEP people.

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, Aspire of WNY has conducted a Four Factor Analysis¹: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

Factor 1—Demography | Number or proportion of the LEP population(s), specifically served or could be served by Aspire of WNY transit service.

The first step to considering the development of a Language Assistance Plan is to examine our transit services and our experiences with LEP individuals, who specifically use our transit services and determine the breadth and scope of the LEP preferred language services that were needed in providing the specific transit services.

Aspire of WNY clients and potential clients are individuals certified by the New York Office for People with Developmental Disabilities (OPWDD) as eligible for services. Our day-to-day clients are pre-assigned by OPWDD. The clients have developmental disabilities, including intellectual disabilities, cerebral palsy, Down syndrome, autism spectrum disorders, Prader-Willi syndrome, and other neurological impairments. The OPWDD assesses the client's language communication ability and communicates their assessment to Aspire of WNY. Since the last Title VI plan update, Aspire of WNY has not had to provide a transit service to our client in another language.

Factor 2—Frequency | Frequency with which LEP people come in contact with Aspire of WNY

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

Aspire of WNY's day-to-day clients are pre-assigned by OPWDD. The clients have developmental disabilities, including intellectual disabilities, cerebral palsy, Down syndrome, autism spectrum disorders, Prader-Willi syndrome, and other neurological impairments. OPWDD assesses the client's language communication ability and communicates their assessments to Aspire of WNY. During the intake process, Aspire of WNY is able to identify non-English speaking parents or guardians of our clients with whom we have frequent contact and, therefore, have staff available to provide oral interpretation. Since the last Title VI plan update, Aspire of WNY has not had to provide a transit service to our client in another language.

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

Aspire of WNY's services are critical to the lives of its clients, and the services support the parents and guardians. Aspire of WNY has taken positive steps in the intake process to identify non-English speaking clients and their parents or guardians with whom we have regular contact. Therefore, Aspire of WNY has staff available to provide oral interpretation as needed, thus ensuring the importance of our client services is communicated to all clients, parents, and guardians in a language other than English. Since the last Title VI plan update, Aspire of WNY has not had to provide our client and the client's parent or guardian assistance in another language.

Factor 4 Resources and Costs | Resources available and employee training

During the new employee orientation, Aspire of WNY provides the principles of Title VI and language assistance, emphasizing that the client's parents and guardians are protected under Title VI and LEP. Our employees obtain language assistance training to continue meeting the needs of our clientele and the LEP individual. Aspire of WNY has adequate resources to provide employee training. Oral interpretation for the client's parent or guardian 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, reasonable attempts will be made to accommodate any person encountered who require written translation or oral interpretation services. 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.

A7. Minority Representation on Advisory Boards

Aspire of WNY has no transit-related, non-elected committees or advisory councils.

Efforts to Encourage Minority Representation on Boards and Committees

Aspire of WNY understands diverse representations on committees, councils and boards results in sound policy reflective of its entire service area. As such, the Aspire of WNY encourages participation of all its clientele/patrons and interested parties on boards, committees, or councils.

As vacancies on boards, committees, and councils become available, Aspire of WNY will make efforts to encourage and promote diversity with the active participation of clientele/patrons, community organizations, and interested parties. Aspire of WNY contacts advocates of the minority community, such as organizations that serve minority communities and leaders to garner interest in participating onboards, committees or councils.

A8. Recordkeeping and Reporting

Aspire of WNY 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.

Aspire of WNY shall update the Title VI Plan, every three years and submit the plan to the New York State Department of Transportation (NYSDOT) for approval.

A9. Plan and Policy Review

The Title VI policy will be disseminated to employees through new employee orientation. Aspire of WNY will review its Title VI Plan at least once every three years to determine if modifications are necessary. Aspire of WNY 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.

| Date | Activity (Review-Update- Addendum- Adoption- Distribution) | Person Responsible | Remarks |
|-------------------|---|-----------------------|---|
| MONTH XX, 20XX | Adopted and distributed | Name | Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy. |
| MONTH XX, 20XX | Annual review of implementation | Name | Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings. |
| MONTH XX, 20XX | Annual review of implementation | Name | Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings. |
| MONTH XX, 20XX | Updated plan, adopted and distributed | Name | Verified all employees received training and copies of Title VI policy. Verified intake materials, postings |

Program Monitoring

Aspire of WNY will monitor the effectiveness of the Title VI program through feedback from clientele, employees, the general public, and other agencies (NYSDOT, FTA). Aspire of WNY seeks opportunities to continuously improve its Title VI plan, public participation outreach efforts and providing meaningful access to our services to LEP individuals.

A10. Facility Location Equity Analysis

As a subrecipient of federal funds, Aspire of WNY 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 Aspire of WNY 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 sitting 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, Aspire of WNY 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 Aspire of WNY was required to, completed, and included a Title VI equity analysis with this Title VI Plan update.

Did Aspire of WNY construct, expand or acquire a facility in the past three years? (*check the box next to the appropriate response below*)

- No.** Aspire of WNY has not constructed, expanded, or acquired a facility.
- Yes.** Aspire of WNY did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

Does Aspire of WNY plan to construct, expand or acquire a facility in the next three years? (*check the box next to the appropriate response below*)

- No.** Aspire of WNY does not plan to construct, expand or acquire a facility.
- Yes.** Aspire of WNY plans to (construct, expand or acquire) a facility.

If yes, was a Title VI equity analysis completed? (*check the box next to the appropriate response below*)

- Yes.** A Title VI equity analysis was completed. A copy of the analysis is included as **Appendix X**.
- No.** A Title VI equity analysis was not completed.

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

Begin typing here.

B. REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

Do not complete this section if you do not provide any fixed route, public transportation service (also known as transit providers). Providers of public transportation that only operate demand response service should not complete this section (e.g., providers of general public paratransit, ADA complementary paratransit, vanpools, and Section 5310 closed door service).

This section should be scaled based on your size as a fixed route transit provider, as explained in Chapter IV of FTA Circular 4702.1B

B1. Service Standards (Quantitative Measures)

Vehicle Load Standard

(Can be expressed as the ratio of passengers to the total number of seats on a vehicle.)

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are **XX** passengers for a **XX** ft minivan.

Vehicle Headway Standard

(Measured in minutes (e.g., every 15 minutes), headway refers to the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Service frequency is measured in vehicles per hour (e.g., 4 vans per hour.)

Service operates every **XX** minutes or better on weekdays beginning from **XX:XX** a.m. to **XX:XX** p.m. On weekends, service operates every **XX** minutes or better beginning from **XX:XX** a.m. to **XX:XX** p.m.

Scheduling involves the consideration of a number of factors including ridership, productivity, relationship to major trip generators, and the location of community services.

On Time Performance Standard

(Expressed as a percentage, this is a measure of runs completed as scheduled. The recipient must define what is considered to be “on time.” Performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along a route.)

A vehicle is considered on time if it departs a scheduled timepoint no more than **XX** minutes early and no more than **XX** minutes late. Aspire of WNY on-time performance objective is **XX** percent or greater. Aspire of WNY continuously monitors on time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standard

(Refers to a general measure of the distribution of routes within a transit provider’s service area, such as setting the maximum distance between bus stops or train stations, or requiring that a percentage of all residents in the service area be within a one-quarter mile walk of bus service.)

Aspire of WNY will distribute transit service so that **XX** percent of all residents in the service area are within a **XX** mile walk of the service.

And the following service policies information:

B2. Service Policies

Service policies (system-wide policies) are adopted to ensure that service design and operations practices do not result in discrimination on the basis of race, color or national origin. Aspire of WNY service policies are:

Transit Amenities Policy

(e.g., benches, shelters/canopies, printed materials, escalators/elevators, and waste receptacles)

Installation of transit amenities along routes are based on the number of passenger boardings along those routes.

Vehicle Assignment Policy

(Refers to the process by which transit vehicles are placed into service throughout a system. Policies for vehicle assignment may be based on the type or age of the vehicle, where age would be a proxy for condition, or on the type of service offered.)

Vehicle assignments consider the operating characteristics of vehicles, which are matched to the operating characteristics of the route, trip purpose of passengers, and volume of ridership along a given route.

C. 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

Aspire of WNY Title VI Plan Board Approval

On behalf of Aspire of WNY Board of Directors, we the Board have reviewed and adopted the Aspire of WNY 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 Aspire of WNY 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 21, 2025

Adopted: February 21, 2025

Adopted By: 

Revised: _____

Adopted By: _____

APPENDIX B: Title VI Complaint Form

Option 1: Title VI Complaint Form

Aspire of WNY Title VI 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 | | | | |
| Date of Alleged Discrimination (Month, Day, Year): _____ | | | | |
| Agency name complaint is against: _____ | | | | |
| Location of where the alleged discrimination occurred:- _____ | | | | |
| 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. | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |

Section IV

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 Court: _____

State Agency: _____

Local Agency: _____

Provide information for the contact person at the agency/court where the complaint was filed.

Name and Title:

Agency:

Address:

Telephone:

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.

Aspire of WNY
Title VI Coordinator
VP of Quality/Compliance Officer
2356 North Forest Rd.
Getzville, NY 14068
MLDodson@aspirewny.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.

Option 2: Title VI and ADA Complaint Form

Aspire of WNY 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: - _____ | | | | |
| 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. | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |
| _____ | | | | |

Section IV

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 Court: _____

State Agency: _____

Local Agency: _____

Provide information for the contact person at the agency/court where the complaint was filed.

Name and Title:

Agency:

Address:

Telephone:

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.

Aspire of WNY
VP of Quality/Compliance Officer
2356 North Forest Rd.
Getzville, NY 14068
MLDodson@aspirewny.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 Aspire of WNY alleging

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 716-505-5671 or in writing to Aspire of WNY at MLDodson@aspirewny.org

Sincerely,

Title VI Coordinator

VP of Quality/Compliance Office

2356 North Forest Rd.

Getzville, NY 14068

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 Aspire of WNY 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.

Aspire of WNY 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,

Title VI Coordinator

VP of Quality/Compliance Officer

2356 North Forest Rd.

Getzville, NY 14068

APPENDIX E: Title VI Complaint Letter of Finding

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated _____ against Aspire of WNY alleging Title VI violation has been investigated. The investigation determined non-compliance by Aspire of WNY 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 _____.

Sincerely,

Title VI Coordinator

VP of Quality/Compliance Officer

2356 North Forest Rd.

Getzville, NY 14068

APPENDIX F: Title VI Notice to the Public

Option 1: Title VI Notice to the Public

Notifying the Public of Rights under Title VI

Aspire of WNY

Aspire of WNY 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. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **Aspire of WNY**.

For more information on the **Aspire of WNY**'s program, and the obligations and procedures to file a complaint, contact 716-505-5671 email MLDodson@aspirewny.org. For more information on how to contact **Aspire of WNY** to find out about Title VI, visit www.Aspirewny.org.

A complainant may file a complaint directly with **Aspire of WNY** TITLE VI Coordinator by following the **Aspire of WNY** 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Option 2: Title VI and ADA Notice to the Public

Notifying the Public of Rights under Title VI and the ADA

Aspire of WNY

Aspire of WNY 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 **Aspire of WNY**.

For more information on **Aspire of WNY**'s program, and the obligations and procedures to file a complaint, contact 716-505-5671 or email MLDodson@aspirewny.org. For more information on how to contact **Aspire of WNY** to find out about Title VI, visit www.Aspirewny.org.

A complainant may file a complaint directly with **Aspire of WNY** TITLE VI Coordinator by following the **Aspire of WNY** 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.