

Cerebral Palsy Transport 51-40 59th Street,  
Woodside, NY 11377

# TITLE VI Plan

July 8, 2024

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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. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

Cerebral Palsy Transport is a nonprofit who receives FTA Section 5310 funding through the New York State Department of Transportation for adults with intellectual and developmental disabilities of any age throughout the New York City. Service is provided through a contract with Constructive Partnerships Unlimited and transportation services are available seven days a week.

## B. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 **TITLE VI PLAN**

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 funds, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.)
  
- ✓ Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
  
- ✓ Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

## **B1. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 TITLE VI Policy**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 and NYSDOT and third-party contractors.

For more information on Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's Title VI program contact:

### **Title VI Coordinator**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377  
Joshua Greenberg  
51-40 59<sup>th</sup> Street  
Woodside, New York 11377  
Phone 718-2050906  
jgreenberg@cpofnys.org

## **B2. Title VI Public Notice**

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's Notice to the Public is posted in the following locations:

- Agency website at: [www.AGENCYNAME.com](http://www.AGENCYNAME.com)
- Public areas of the agency office (name of office or address. Public areas means common area, public meeting rooms, etc.)
- Inside transit vehicles

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

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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. AGENCY NAME 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377.

For information on Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's Title VI policy or to obtain the Title VI complaint form and procedures contact:

**Joshua Greenberg, Title VI Coordinator**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377  
718-205-0906  
jgreenberg@cpofnys.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 718-205-0906.

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

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's Title VI Complaint Procedure is available in the following locations:

- Agency website at: [www.AGENCYNAME.com](http://www.AGENCYNAME.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.

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377  
Joshua Greenberg, Title VI Coordinator  
Phone 718-205-0906  
[jgreenberg@cpofnys.org](mailto:jgreenberg@cpofnys.org)

The complaint form is not required to file a complaint. The complainant may submit any written report as a complaint notice. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will make reasonable modifications and take information verbally if the complainant requires this accommodation.

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 investigates complaints received no more than 180 days after the alleged incident. Once the complaint is received, the Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will follow the steps below:

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if the Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 at 718-205-0906.

*Si se necesita informacion en otro idioma por favor contacto, 718-205-0906*



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

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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:**

**2021**

**2022**

**2023**

**Check One:**

There have been no investigations, complaints and/or lawsuits filed against Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 during the reporting period.

There have been investigations, complaints and/or lawsuits filed against Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377. *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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 primarily serves only clients that have been determined to be eligible for our transit service by the **Office of Persons with Developmental Disabilities (OPWDD)** (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. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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***

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's program decision-making public involvement is limited to the population that meets the eligibility criteria set by the OPWDD (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 parents, caregivers, community members) that provide services to minority, low income and LEP communities

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.

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

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 is required to develop and implement a Public Participation Plan (PPP). This document describes the proactive strategies, procedures, and desired outcomes that underpin our organization's public participation activities. The determination of how specific public participation activities should take place, and which specific measures are most appropriate is based on the following:

- A demographic analysis of the persons Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 serves and/or are eligible to receive services.
- The type of transportation program and/or service Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 provides.
- The resources available to Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 for public outreach.

Effective public involvement is a key element to involving the public in Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's transit service decision making process. This Public Involvement Process describes how Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 who 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.

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

In efforts to involve minority and limited English proficient (LEP) populations in the planning process and to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377's decision-making process, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 implements early, frequent and continuous engagement for public involvement. The engagement methods includes and are not limited to:

1. Post public involvement notifications on transit vehicles, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 building, and on the Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 website.
2. Public meetings will be conducted at times, locations, and facilities that are convenient and accessible.
3. Meeting materials will be available in a variety of predetermined formats and language(s) to serve diverse audiences.
4. Provide professional interpreters in the language(s) spoken by the targeted LEP population(s).

### **Summary on Public Involvement Activity**

Since the last Title VI plan update, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 conducted the following public involvement outreach (emails, website posting, media outlets, in-person, virtual) sessions:

Not applicable; Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 is a closed-door service provider.

<b>Event Name</b>	<b>Date</b> (Month, Day, Year)	<b>Brief Description of Event Purpose</b>	<b>Outcome Methods</b>	<b>Summary of Attendance</b>

### **B6. Language Assistance Plan**

**Option B: Agencies serving a wide range of older adults, people with disabilities, or providing general public transportation** may wish to rely upon the Limited English Proficiency documentation and plans included in the Human Services – Public Transportation Coordination Plan prepared by the metropolitan planning organization (MPO) or the county. You may be receiving operating funds, or you may be doing mobility management throughout your region. If you wish to follow Option B, verify that your project is in the MPO/County’s Coordination Plan and that you understand the languages in your area requiring translation of key documents (such as the Title VI Public Notice) and the tools used in your area to meet the language needs of your clientele (such as language cards, posters, or interpreters). Option B starts on page 14.

## ***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, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons.

In order to ensure meaningful access to Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 transit service.
2. The frequency with which LEP persons come into contact with Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377.
3. The nature and importance of Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 transit service

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 relied on prior experiences with LEP individuals and determined the breadth and scope of language services that were requested on the transit services. During a 12- month period, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 tracked the number of calls to the office in which language assistance was requested, tracked the number of times the transit operators were asked to provide language assistance and by the specific language, tracked the number of times minor children and dependents were asked by their parent or guardian to interpret the transit service information. In addition, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 consulted with the school district, community agencies and religious organizations where transit

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

services are provided to ask what language assistance, they encounter for their services that could possibly be identified as the language assistance for the transit ridership.

**Factor 2: Frequency** | Frequency with which LEP people come into contact with Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377

Based on the results of the number or proportion of the LEP population(s), specifically served or could be served by Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 transit service, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 we know that less than 5% of the transit service population we serve speak English less than very well. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 transit services to LEP population

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377'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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 LEP population, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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. To supplement these resources, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 may also retain the services of an interpreter, translate vital documents, and utilize community volunteers. After analyzing the Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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***

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 currently meets the language assistance needs of the population (other languages including ASL) through the services of an interpreter, including Google translate on our website, accessing community organizations that meet the needs of other languages including ASL-speaking population, and our multilingual staff. As needed, key documents are translated to other languages including ASL., 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. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 also utilizes community-based organizations to share the availability of these services, public meetings, rider surveys and interviews, outreach documents, and on vehicles.

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 annually identifies the language capabilities and language assistance needs of our ridership. Should Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 have more than 5% of persons in a specific language group that requires language assistance, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will incorporate components that encourages feedback from customers on their experience with the implementation of the Language Assistance Plan. Based on the input received, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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***

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377'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**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 has no transit-related, non-elected committees or advisory councils.

## **B8. Recordkeeping and Reporting**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will review its Title VI Plan at least once every three years to determine if modifications are necessary. The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 [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***

<b>Date</b>	<b>Activity (Review-Update- Addendum- Adoption- Distribution)</b>	<b>Person Responsible</b>	<b>Remarks</b>
July 1, 2024	Adopted and distributed	Joshua Greenberg	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
July 1, 2025	Annual review of implementation	Joshua Greenberg	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
July 1, 2026	Annual review of implementation	Joshua Greenberg	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
July 1, 2027	Updated plan, adopted and distributed	Joshua Greenberg	Verified all employees received training and copies of Title VI policy. Verified intake materials, postings

***Program Monitoring***

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will monitor the effectiveness of the Title VI program through the feedback from clientele, employees, public and other agencies (NYSDOT, FTA). Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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, Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 was required to, completed, and included a Title VI equity analysis with this Title VI Plan update.

Did Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 construct, expand or acquired a facility in the past three years?

**No.** Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 has not constructed, expanded or acquired a facility.

**Yes.** Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

Does Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 plan to construct, expand or acquire a facility in the next three years? (*check the box next to the appropriate response below*)

**No.** Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 does not plan to construct, expand or acquire a facility.

**Yes.** Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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?

## C. REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

### C1. 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 N/A passengers for a N/A 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 N/A minutes or better on weekdays beginning from N/A a.m. to N/A p.m. On weekends, service operates every NA minutes or better beginning from N/A a.m. to N/A 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 N/A minutes early and no more than N/A minutes late. The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 on-time performance objective is N/A percent or greater. The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.)*

The Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 will distribute transit service so that N/A percent of all residents in the service area are within a N/A mile walk of the service.

And the following service policies information:

## **C2. 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. Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.

## **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**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 Title VI Plan Board Approval

On behalf of the Constructive Partnerships Unlimited, Inc., we the Board have reviewed and adopted the Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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:** 7/8/25

**Adopted:** 7/8/24

**Adopted By:** Constructive Partnerships Unlimited, Inc.

**Revised:** N/A

**Adopted By:** N/A

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

**Option 1: Title VI Complaint Form**

**Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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:- _____				
<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"/> <b>Yes</b>                                      <input type="checkbox"/> <b>No</b></p> <p><i>If yes, check all that apply:</i></p> <p><input type="checkbox"/> <b>Federal Agency:</b> _____</p> <p><input type="checkbox"/> <b>Federal Court:</b> _____                                      <input type="checkbox"/> <b>State Agency:</b> _____</p> <p><input type="checkbox"/> <b>State Court:</b> _____                                      <input type="checkbox"/> <b>Local Agency:</b> _____</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.**

_____	_____
<b>Signature</b>	<b>Date</b>

**Please submit this form by mail, email or in person to the address below.**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377  
 Joshua Greenberg, Title VI Coordinator  
 51-40 59<sup>th</sup> Street  
 Woodside, NY 11377  
 jgreenberg@cpofnys.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**

**Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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"/> <b>Yes</b>                      <input type="checkbox"/> <b>No</b></p> <p><i>If yes, check all that apply:</i></p> <p><input type="checkbox"/> <b>Federal Agency:</b> _____</p> <p><input type="checkbox"/> <b>Federal Court:</b> _____                      <input type="checkbox"/> <b>State Agency:</b> _____</p> <p><input type="checkbox"/> <b>State Court:</b> _____                      <input type="checkbox"/> <b>Local Agency:</b> _____</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.**

_____	_____
<b>Signature</b>	<b>Date</b>

**Please submit this form by mail, email or in person to the address below.**

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377  
 Joshua Greenberg, Title VI Coordinator  
 51-40 59<sup>th</sup> Street  
 Woodside, NY 11377  
 jgreenberg@cpofnys.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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 718-205-0906 or in writing to Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377, 51-40 59<sup>th</sup> Street, Woodside, NY, 11377 or [jgreenberg@cpofnys.org](mailto:jgreenberg@cpofnys.org)

Sincerely,

Joshua Greenberg

Title VI Coordinator

51-40 59<sup>th</sup> Street

Woodside, NY 11377

[jgreenberg@cpofnys.org](mailto:jgreenberg@cpofnys.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 Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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.

Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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,

Joshua Greenberg

Title VI Coordinator

51-40 59<sup>th</sup> Street

Woodside, NY 11377

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

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated \_\_\_\_\_ against Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 alleging Title VI violation has been investigated. The investigation determined non-compliance by Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377 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 718-205-0906.

Sincerely,

Joshua Greenberg

Title VI Coordinator

51-40 59<sup>th</sup> Street

Woodside, NY 11377

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

## Option 1: Title VI Notice to the Public

### Notifying the Public of Rights under Title VI

#### **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**

The **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** 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 the **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**.

For more information on the **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**'s program, and the obligations and procedures to file a complaint, contact 718-205-0906; email [jgreenberg@cpofnys.org](mailto:jgreenberg@cpofnys.org); or visit our office at **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**. For more information on how to contact **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** to find out about Title VI, visit [www.cpfny.org](http://www.cpfny.org).

A complainant may file a complaint directly with **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** TITLE VI Coordinator by following the **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** 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 718-205-0906.

*Si necesita información en otra idioma, por favor contacto 718-205-0906.*

## Option 2: Title VI and ADA Notice to the Public

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

#### **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**

The **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** 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 **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**.

For more information on the **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**'s program, and the obligations and procedures to file a complaint, contact 718-205-0906; email [jgreenberg@cpfny.org](mailto:jgreenberg@cpfny.org) or visit our office at **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377**. For more information on how to contact **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** to find out about Title VI, visit [www.cpunlimited.org](http://www.cpunlimited.org).

A complainant may file a complaint directly with **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** TITLE VI Coordinator by following the **Cerebral Palsy Transport 51-40 59th Street, Woodside, NY 11377** 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 718-205-0906.

*Si necesita información en otra idioma, por favor contacto 718-205-0906.*