



**POLICY #:** 124

**SUBJECT:** Title VI Non-Discrimination Policy

**EFFECTIVE DATE OF BOARD APPROVAL:** March 27, 2019

Bernie Burns  
Executive Director

Helen Binkowski  
Board President

**Policy:**

The Arc of Steuben does not believe in or condone discrimination of any type including, but not limited to, discrimination on the grounds of disability, race, color, national origin, religion or sexual orientation.

**Purpose:**

As a recipient of federal and state funds, The Arc of Steuben is subject to the requirements and provisions of Title VI of the Civil Rights Act of 1964, as amended. Non-compliance with this mandate can affect federal financial assistance.

The Civil Rights Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and consultants, whether such programs and activities are federally assisted or not.

The Arc of Steuben is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of disability, race, color, national origin, religion or sexual orientation as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

The Arc of Steuben assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. The Steuben Area Rides Transportation Manager's Office is responsible for monitoring the Title VI activities for Steuben Area Rides. The Corporate Compliance Officer/Director of Quality Enhancement will monitor Title VI activities for all other programs.

Anyone who has a discrimination complaint against The Arc of Steuben with regard to any program or activity should complete a complaint form available at The Arc of Steuben reception areas and on the agency's website. Complaints should be made in writing and mailed or brought to:

**The Arc of Steuben  
Attn: Director of Quality Enhancement  
Title VI Coordinator  
Corporate Compliance Officer/Director of Quality Enhancement  
One Arc Way  
Bath, NY 14810**

OR

**Email:** [corporatecomplianceconcerns@arcofsteuben.org](mailto:corporatecomplianceconcerns@arcofsteuben.org)

The Arc of Steuben will respond and may request further information with the goal of obtaining an appropriate resolution. Formal complaints related to transportation projects may also be initiated by filing a complaint with the Federal Highway Administration (FHWA) or Federal Transit Administrative Office of Civil Rights. All formal complaints can also be initiated with the New York State Division of Human Rights. Those agencies can be contacted at the following addresses:

**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**

**NYS Division of Human Rights  
333 East Washington St  
Syracuse NY 13202  
1-888-392-364**

**Federal Highway Administration (FHWA)  
US Department of Transportation  
1200 New Jersey Ave, SE  
8<sup>th</sup> Floor E81-105—Civil Rights  
Washington DC 20590**

## **Public Notification Process**

### **Title VI Information Dissemination**

Title VI information shall be prominently and publicly displayed at The Arc of Steuben. The name of the Title VI coordinator is available on The Arc of Steuben website [www.arcofsteuben.org](http://www.arcofsteuben.org).

Title VI information shall be disseminated to The Arc of Steuben associates upon hire and annually. This reminds associates of The Arc of Steuben's policy statement, and of their Title VI responsibilities in their daily work and duties.

## **Title VI Complaint Process**

### ***How to file a Title VI Complaint?***

A complainant may file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Name of complainant, mailing address, and how to contact the complainant (i.e. telephone number, e-mail address, etc.).
- How, when, where, and why the complainant believes he or she was discriminated against. The complainant shall include the location, names, and contact information of any witnesses.
- Other information that is deemed significant by the complainant.

The Title VI Complaint Form (attached) should be used to submit the complaint information. The complaint may be filed in writing to The Arc of Steuben at the following address:

**The Arc of Steuben**  
**Attn: Director of Quality Enhancement**  
**Title VI Coordinator**  
**One Arc Way**  
**Bath, NY 14810**

OR

**Phone:** Corporate Compliance Helpline (607) 622-1950  
**Email:** [corporatecomplianceconcerns@arcofsteuben.org](mailto:corporatecomplianceconcerns@arcofsteuben.org)

### **What happens to the complaint once it is submitted?**

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by The Arc of Steuben will be directly addressed. The Arc of Steuben shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, The Arc of Steuben shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of a complaint will be mailed within seven business days to the complainant. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

***How will the complainant be notified of the outcome of the complaint?***

The Arc of Steuben shall send a final written response letter to the complainant. If a complaint is not substantiated the complainant will be advised of his or her right to:

1. File a complaint externally with the Federal Highway Administration (FHWA) and/or the Federal Transit Administration
2. File a complaint with the New York State Division of Human Rights.

In addition to the complaint process above, a complainant may file a Title VI complaint with the following offices:

**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**

**NYS Division of Human Rights  
333 East Washington St  
Syracuse NY 13202  
1-888-392-364**

**Federal Highway Administration (FHWA)  
US Department of Transportation  
1200 New Jersey Ave, SE  
8<sup>th</sup> Floor E81-105—Civil Rights  
Washington DC 20590**

Source: Operations

Approval:

Revision: