



Victor Association of Cultural and Performing Arts Inc.

TITLE VI PROGRAM

1622 State Route 332 Farmington, NY 14425
Ph: 585-398-0220 Fax: 585-398-0072
CobblestoneArtsCenter.com

**Victor Association of Cultural & Performing Arts / DBA:
COBBLESTONE ARTS CENTER
Title VI Program**

I. Plan Statement

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" (42 U.S.C. Section 2000d).

COBBLESTONE ARTS CENTER is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

This plan was developed to guide COBBLESTONE ARTS CENTER in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in COBBLESTONE ARTS CENTER facilities. The name of the Title VI coordinator is available on the COBBLESTONE ARTS CENTER website, www.cobblestoneartscenter.com Additional information relating to non-discrimination obligation can be obtained from the COBBLESTONE ARTS CENTER Title VI Coordinator.

Title VI information shall be disseminated to COBBLESTONE ARTS CENTER employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of COBBLESTONE ARTS CENTER of the policy statement and of their Title VI responsibilities in their daily work and duties. During New Employee Orientation, new employees shall be informed of the provisions of Title VI and the expectations of COBBLESTONE ARTS CENTER employees to perform their duties accordingly. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

IV. Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the COBBLESTONE ARTS CENTER Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants and Title VI investigations.

V. Title VI Complaint Procedures

How to file a Title VI Complaint

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)

How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint must be filed in writing with COBBLESTONE ARTS CENTER at the following address in order for COBBLESTONE ARTS CENTER to properly investigate any complaint:

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

NOTE: COBBLESTONE ARTS CENTER encourages all complaints to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than one hundred eighty (180) days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

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

A letter acknowledging receipt of complaint will be mailed within seven (7) days (see Appendix D). 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?

A representative of COBBLESTONE ARTS CENTER will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) provide additional information to COBBLESTONE ARTS CENTER for consideration of the complaint within seven (7) calendar days of receipt of the final written decision from COBBLESTONE ARTS CENTER , and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within sixty (60) working days of receipt of such complaints.

In addition to the complaint process described 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, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

VI. Language Assistance Plan

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP (Limited English Proficiency) persons.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. COBBLESTONE ARTS CENTER 's Language Assistance Plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of the DOT LEP guidance.

1. Identifying LEP Individuals

Based on data collected by Cornell University in 2013

(<http://pad.human.cornell.edu/profiles/Ontario.pdf>) other than English (93.1%), the language(s) reported most as being spoken at home in Ontario County were Spanish (3.2%), followed by Indo- European (2.6%), then Asian/Pacific Islander (0.8%) and lastly Other (0.3%)

2. Providing Services

While COBBLESTONE ARTS CENTER does not currently have an on-going need for professional translation services Outside of COBBLESTONE ARTS CENTER services are available through: Accuworld Language Translation Services, Accredited Language Services (ALS), Empire Interpreting Service, and MIAMI (Multicultural Association of Medical Interpreters) for international translation and interpreting, and Aurora of CNY interpreter referral service for the blind and deaf.

3. Communicating Availability of Language Assistance

Individuals who are referred to the COBBLESTONE ARTS CENTER program for services are provide one-on-one guidance and program planning. Team that meets daily, and which any of whom can offer translation services as needed. Agency reception staff can also offer translation services to guests and consumers' family members as appropriate.

4. Monitoring

COBBLESTONE ARTS CENTER maintains an Accessibility Plan which is designed to minimize barriers that are created by architectural, environmental, attitudinal, financial, employment, communication, transportation and community integration. Satisfaction Surveys offer an opportunity for individuals served and their care givers to provide input or suggest additional services. To date COBBLESTONE ARTS CENTER has used translation services provided by either in-house staff or through outside providers.

The Title VI Plan will also be reviewed every three years.

Employee Training

As part of the Accessibility Plan, COBBLESTONE ARTS CENTER encourages staff interest and education in learning to more effectively communicate with individuals served.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

As previously stated, the Community Integration program serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majorities of consumers have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by Case Service Counselors.

VII. Membership of Non-Elected Committees and Councils

COBBLESTONE ARTS CENTER does not have a non-elected transit related advisory council at this time.

VIII. Title VI Equity Analysis

COBBLESTONE ARTS CENTER does not have transit related facilities

**Board of Directors Approval of the
COBBLESTONE ARTS CENTER
Title VI Program**

**A RESOLUTION OF THE COBBLESTONE ARTS CENTER BOARD
OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE
PLAN FOR THE AGENCY.**

WHEREAS, COBBLESTONE ARTS CENTER desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of COBBLESTONE ARTS CENTER as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of COBBLESTONE ARTS CENTER in Ontario County, State of New York, on this date:

President of the Board

Appendix B: Employee Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the COBBLESTONE ARTS CENTER Title VI Plan. I have read the plan and am committed to ensuring that no participant is excluded from, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

Employee signature

Print name

Date

Appendix C: TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires 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.” If you feel you have been discriminated against by the COBBLESTONE ARTS CENTER Transportation Department, please provide the following information in order to assist us in processing your complaint and send it to:

1. State your name and address.

Name: _____

Address: _____

Telephone No.: Home (____) _____ Work: (____) _____

Other (____) _____

2. Person(s) discriminated again, if different from above:

Name: _____

Address: _____

Telephone No.: Home (____) _____ Work: (____) _____

Other (____) _____

Please explain your relationship to this person(s): _____

3. Does your complaint concern discrimination in the delivery of services or in other discriminatory actions of the department or agency in its treatment of you or others? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken.

_____ Race/Ethnicity: _____

_____ National Origin: _____

_____ Sex: _____

_____ Religion: _____

_____ Age: _____

_____ Disability: _____

4. What is the most convenient time and place for us to contact you about this complaint?

5. If you have an attorney representing you concerning the matters raised in the complaint, please provide the following:

Name: _____

Address: _____

Telephone No.: (____) _____

6. To your best recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____

Most recent date of discrimination: _____

7. Complaints of discrimination must generally be filed within one hundred eighty (180) days of the alleged discrimination. If the most recent date of discrimination, listed above, is more than one hundred eighty (180) days ago, you may request a waiver of the filing requirement. If you wish to request a waiver, please explain why you waited until now to file your complaint.

8. Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary and attach a copy of written materials pertaining to your case.)

9. Please list below any persons (witnesses, fellow PACE participants, employees, or others), if known, whom we may contact for additional information to support or clarify your complaint.

Name, Address, Phone No.

10. Do you have any other information that you think is relevant to our investigation of your allegations?

11. What remedy are you seeking for the alleged discrimination?

12. Have you (or the person allegedly discriminated against) filed the same or any other complaints with other governmental offices (including but not limited to the Federal Transit Administration or the Department of Civil Rights)?

Yes _____ No _____

If so, please state the name, address and contact information of the agency at which the complaint was filed and the current status of that appeal:

Agency: _____

Contact Person: _____

Address: _____

Telephone #: _____

13. We cannot accept a complaint if it has not been signed. Please sign and date this complaint form below.

Signature Date

Print Name

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

APPENDIX D: Letter Acknowledging Receipt of Complaint

Date

Name

Address

City, State Zip

Dear Name:

This letter is to acknowledge receipt of your complaint against COBBLESTONE ARTS CENTER Transportation Department 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 (585) 398-0220 or in writing to COBBLESTONE ARTS CENTER Transportation, 1622 State Route 332 Farmington NY 14425 .

Sincerely,

Name

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

APPENDIX E: Letter Notifying Complainant that the Complaint Is Substantiated

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated _____ against COBBLESTONE ARTS CENTER Transportation alleging Title VI violation has been investigated. (An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

APPENDIX F: Letter Notifying Complainant that the Complaint Is Not Substantiated

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your complaint dated _____ against the COBBLESTONE ARTS CENTER Transportation 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.

COBBLESTONE ARTS CENTER Transportation has analyzed the materials and facts pertaining to your case for evidence of the Department's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated and that I am closing this 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 from COBBLESTONE ARTS CENTER , and/or 2) file a complaint externally with the U.S. Department of Transportation and/or 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,

Name

Title VI Coordinator Contact information

COBBLESTONE ARTS CENTER

Jennifer Williamson

Title VI Coordinator

1622 State Route 332

Farmington NY 14425

585-398-0220

APPENDIX G: Sample of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

COBBLESTONE ARTS CENTER is committed to ensuring that no person is excluded from participation in, denied the benefits of, or be subjected to discrimination in the receipt of its services on the basis of race, color, or national origin, as protected by Title VI of the Civil rights Act of 1964.

If you feel you are being denied participation in or being denied benefits of the services provided by COBBLESTONE ARTS CENTER , or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office @ 585-398-0220