



Copper City Community Connection Title VI Plan

Revised January, 2024

Updated October 6, 2025

I. Title VI Policy and Program Statement

No person 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.

All employees of CCCC are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the CCCC Title VI coordinator.

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).

Copper City Community Connection (CCCC) is committed to ensuring that no person is excluded from participation in or denied the benefits of its Programs and transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide administration and management of Title VI-related activities.

Copper City Community Connection provides transportation for program clients at its Senior Community Center and social adult day program. Service is operated to and from day programs as well as for activity trips and events.

Title VI Coordinator Contact information

Susan Streeter, Executive Director

Copper City Community Connection

sstreeter@coppercitycommunityconnection.com

315-337-8230

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in CCCC's administrative offices and its web site, www.coppercitycommunityconnection.com. Offices are located at 305 E. Locust Street, Rome, NY 13440. Additional information relating to nondiscrimination obligation can be obtained from the CCCC Executive O: Organization-wide Policies and Procedures/Corporate Compliance/Title VI policy 2024

Director. The information will also be displayed on appropriately sized posters or cards inside vehicles operated by CCCC.

The **Copper City Community Connection** 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. Copper City Community Connection 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 **Copper City Community Connection**.

For information on **Copper City Community Connection's** Title VI policy or to obtain the Title VI complaint form and procedures visit our website at www.coppercitycommunityconnection.com. Or contact:

Title VI Coordinator
Copper City Community Connection
305 E. Locust Street
Rome, New York 13440
Phone (315) 3378230
info@coppercitycommunityconnection.com

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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590

For information in another language, please contact the Title VI Coordinator.

Title VI information shall be disseminated to employees annually via the Employee Education Training Log (see Appendix A).

During new employee orientation, new employees shall be informed of the provisions of Title VI, and CCCC's expectations to perform their duties.

All employees shall be provided with a copy of the Title VI Plan. Employees are required to sign that they have been provided access. (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from CCCC where funding is from the following sources: O: Organization-wide Policies and Procedures/Corporate Compliance/Title VI policy 2024

originates from federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

CCCC will maintain permanent records/Log, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of 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 Process

A complainant may file a signed, written complaint up to 180 days from the date of the alleged discrimination. The complaint should include the following information:

- Name of individual filing the complaint, mailing address, and contact information (i.e., telephone number, email address, etc.)
- How, when, where and why the complainant believes he or she was discriminated against, including the location, names, and contact information of any witnesses.
- Other information that deemed significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with CCCC at the following address:

Copper City Community Connection
Attention: Susan Streeter
305 E. Locust Street
Rome, New York
13440

NOTE: CCCC encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator/Executive Director as soon as possible, but no later than 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 CCCC will be directly addressed by CCCC. CCCC shall also provide appropriate assistance to complainants, including those persons with disabilities, or who

are limited in their ability to communicate in English. Additionally, CCCC 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 days (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?

CCCC 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) appeal within seven calendar days of receipt of the final written decision from CCCC, 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 60 working days of receipt of such complaints, if not sooner.

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

NYS Administration Office of Civil Rights Attention

List of investigations, complaints, or lawsuits filed since the time of the last submission of a Title VI Plan: There have been no investigations, complaints or lawsuits filed as of the latest update of this policy.

VI. Four Factor Analysis and Language Assistance Plan

CCCC has a language Assistance Plan that defines what action the agency will take when someone is identified with a limited English proficiency. CCCC will engage the services of local communication assistance resources to mitigate language barriers to ensure proper communication and understanding.

Title VI Equity Analysis

CCCC has no plans for construction of facilities at this time.

- a. When evaluating locations of facilities, CCCC will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- b. If CCCC determines that the location of the projects will result in a disparate impact on the basis of race, color or national origin, then the agency will only locate the project

in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color or national origin. CCCC will show how both tests are met; it is important to understand that in order to make this showing, CCCC must consider and analyze alternatives to determine whether those alternatives would have less of disparate impact on the basis of race, color, nor national origin, and then implement the least discriminatory alternative.

Proof of Board Approval of Plan

CCCC will use the Board Resolution process to demonstrate Policy and update approval.



Appendix A:

Employee Annual Education Form and Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the training, education, and receipt of the CCCC Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

Your signature

Print your 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 in services, please provide the following information in order to assist us in processing your complaint and sent it to:

Please mail to:

Copper City Community Connection
305 E. Locust Street
Rome, NY 13440
Phone # 315-337-8230

Please print clearly:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____(home) _____(cell) _____(message)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

_____race or color
_____national origin
_____income
_____other

What was the date of the alleged discrimination?

Where did the alleged discrimination take place?

Please describe the circumstances as you saw it: ____

Please list any and all witnesses' names and phone numbers:

What type of corrective action would you like to see taken?

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

CCCC: Susan Streeter, Title VI
Coordinator/Executive Director

305 E. Locust Street

Rome, New York 13357

Your signature

Print your name

_____ Date: _____

Appendix D Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against CCCC 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 telephoning (315)337-8230 or write to me at 305 E. Locust St., Rome, New York 13440.

Sincerely,

Susan Streeter
Executive Director Title VI Coordinator
Copper City Community Connection



Appendix E Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against CCCC 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,

Susan Streeter
Executive Director/Title VI Coordinator
Copper City Community Connection



Appendix F

Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the CCCC 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.

CCCC has analyzed the materials and facts pertaining to your case for evidence of the agency'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) appeal within seven calendar days of receipt of this final written decision or file a complaint externally with the NYS Civil Rights Administration.

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,

Susan Streeter, Executive Direction /Title VI Coordinator,
Copper City Community Connection



Appendix G

Samples of Narrative to be included in Posters at the Facilities

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).

CCCC is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. **If you feel you are being denied participation in or being denied benefits of the services provided by CCCC or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Copper City Community Connection

Executive Director / Title VI Coordinator
305 E. Locust ST
Rome, NY 13440
315-337-8230

