



# BRIDGES

## TITLE VI Plan

October 30, 2025

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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. BRIDGES is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how BRIDGES incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

BRIDGES provides transportation for Veterans in Rockland County, NY. This is a door-to-door service that transports Veterans on accessible vans to and from their medical appointments at VA Hospitals in Castle Point and Montrose, NY.

## B. BRIDGES TITLE VI PLAN

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 funds, BRIDGES 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.)

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

## B1. BRIDGES TITLE VI Policy

BRIDGES 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 BRIDGES and NYSDOT and third-party contractors.

For more information on BRIDGES's Title VI program contact:

### **Title VI Coordinator**

BRIDGES  
Director of Legal Advocacy  
2290 Palisades Center Drive  
West Nyack, NY 10994  
(845)624-1366  
smitchellweed@bridgesrc.org

## B2. Title VI Public Notice

*For the list below, check all that apply, make the appropriate customizations, and remove the yellow highlighting.*

*The actual public notice postings are available in Appendix F.*

The BRIDGES's Notice to the Public is posted in the following locations:

- ☐ Agency website at: [www.bridgesrc.org](http://www.bridgesrc.org)
- ☐ 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.

BRIDGES 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 BRIDGES.

For information on BRIDGES's Title VI policy or to obtain the Title VI complaint form and procedures visit our website at [www.bridgesrc.org](http://www.bridgesrc.org). Or contact:

**Title VI Coordinator**  
BRIDGES  
2290 Palisades Center Drive  
West Nyack, NY 10994  
(845)624-1366  
[smitchellweed@bridgesrc.org](mailto:smitchellweed@bridgesrc.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 845-624-1366.

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

The BRIDGES's Title VI Complaint Procedure is available in the following locations:

- ☒ Agency website at: [www.bridgesrc.org](http://www.bridgesrc.org)
- ☐ Hard copy in the central office
- ☐ In client intake materials
- ☐ Other

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.

BRIDGES  
Title VI Coordinator  
2290 Palisades Center Drive  
West Nyack, NY 10994  
(845)624-1366  
[smitchellweed@bridgesrc.org](mailto:smitchellweed@bridgesrc.org)

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

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

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if the BRIDGES 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 BRIDGES 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 BRIDGES 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 BRIDGES 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 BRIDGES at (845)624-1366.

*Si se necesita informacion en otro idioma por favor contacto, (845)624-1366.*



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

BRIDGES 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 name. A case number is preferable.)

**Reporting Period:**

**Insert dates (year 1)**

**Insert dates (year 2)**

**Insert dates (year 3)**

**Check One:**

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

There have been investigations, complaints and/or lawsuits filed against BRIDGES. *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 BRIDGES 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.

BRIDGES primarily serves only clients that have been determined to be eligible for our transit service by the Rockland County Department of Mental Health (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. BRIDGES 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***

BRIDGES's program decision-making public involvement is limited to the population that meets the eligibility criteria set by the Rockland County Department of Mental Health (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 that provide services to minority, low income and LEP communities

BRIDGES assists the Funder during open-house events and the enrollment period as well as promoting the Funder's public involvement campaign to a diverse community. Members of the public who request notices and or handouts in a language other than English will be referred to staff who can provide interpretation assistance or to the Funder for assistance.

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

BRIDGES 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 BRIDGES serves and/or are eligible to receive services.
- The type of transportation program and/or service BRIDGES provides.
- The resources available to BRIDGES for public outreach.

Effective public involvement is a key element to involving the public in BRIDGES's transit service decision making process. This Public Involvement Process describes how BRIDGES 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 BRIDGES's decision-making process, BRIDGES 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, BRIDGES building, and on the BRIDGES 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, BRIDGES conducted the following public involvement outreach (emails, website posting, media outlets, in-person, virtual) sessions:

☒ Not applicable; BRIDGES is a closed door service provider.

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

## **B6. Language Assistance Plan**

### **Language Assistance Plan Components**

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

1. A number or proportion of the LEP population(s) specifically served or that could be served by BRIDGES transit service.
2. The frequency with which LEP persons come into contact with BRIDGES.
3. The nature and importance of BRIDGES 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 what the specific languages are spoken in our transit service area and to determine what language services are appropriate for the LEP population, the BRIDGES has conducted a Four Factor Analysis<sup>1</sup>: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

**Factor 1–Demography** | Number or proportion of the LEP population(s), specifically served or could be served by BRIDGES transit service.

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

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

BRIDGES assessed the oral and written language needs of the individuals who specifically receive our transit services and of the parent or guardian of our clients. Our agency emphasizes communication with all clients, their parents and or guardians. Communication is important to provide client dignity and for effective treatment plans or activities. Since the last Title VI plan update, BRIDGES has not had to provide a transit service to our client, the client's parent or guardian in another language.

**Factor 2–Frequency |** Frequency with which LEP people come in contact with BRIDGES

BRIDGES's day-to-day clients and their parents or guardians are assessed for their ability to understand English. Most of our direct clients have limited verbal communication ability and or have limited verbal language comprehension levels. During the intake process, BRIDGES is able to identify non-English speaking parents or guardians of our clients with whom we have frequent contact; and therefore, have staff available to provide oral interpretation. Our client parents and guardians speak English very well. Since the last Title VI plan update, BRIDGES has not had to provide our client and the client's parent or guardian with assistance in another language.

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

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

**Factor 4 Resources and Costs |** Resources available and employee training

During new employee orientation, BRIDGES provides the principles on Title VI and language assistance with an emphasis that the client's parents and guardians are protected under Title VI and LEP. Our employees obtain language assistance training to continue to meet the needs of our clientele and the LEP individual. BRIDGES has adequate resources to provide employee training. Oral interpretation for the client's parent or guardian is provided at no cost to the client.

### ***Implementing the Language Assistance Plan***

As a result of the four-factor analysis, a Language Assistance Plan is not required. However, reasonable attempts will be made to accommodate any persons encountered who require written translation or oral interpretation services. The Language Assistance Plan will be monitored annually for any language assistance change. If no change occurs, the Language Assistance Program will at a minimum be updated during the Title VI plan update.

### ***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, BRIDGES will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons.

In order to ensure meaningful access to BRIDGES 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 BRIDGES transit service.
2. The frequency with which LEP persons come into contact with BRIDGES.
3. The nature and importance of BRIDGES 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 BRIDGES has conducted a Four Factor Analysis<sup>2</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 BRIDGES transit service

BRIDGES 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, BRIDGES 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, BRIDGES consulted with the school district, community agencies and religious organizations where transit services are provided to ask what language assistance they

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<sup>2</sup> DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

encounter for their services that could possibly be identified as the language assistance for the transit ridership.

The transit specific language assistance survey indicates the ridership primarily speaks English. No other language rose to the level of having a limited English proficient population that uses the transit services.

#### **Factor 2: Frequency |** Frequency with which LEP people come into contact with BRIDGES

Based on the results of the number or proportion of the LEP population(s), specifically served or could be served by BRIDGES transit service, BRIDGES we know that less than 5% of the transit service population we serve speak English less than very well. BRIDGES 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 BRIDGES transit services to LEP population

The BRIDGES'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 BRIDGES LEP population, BRIDGES 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 this resource, BRIDGES may also retain the services of an interpreter, translate vital documents, and utilize community volunteers. After analyzing the BRIDGES 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***

BRIDGES currently meets the language assistance needs of the English-Spanish-Creole-speaking population through the services of an interpreter, accessing community organizations that meet the needs of English-Spanish-Creole-speaking population, and our multilingual staff. As needed, key documents are translated to the English-Spanish-Creole, 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. BRIDGES also utilizes community-based organizations to share the availability of these services, public meetings, rider surveys and interviews, outreach documents, and on vehicles.

BRIDGES annually identifies the language capabilities and language assistance needs of our ridership. Should BRIDGES have more than 5% of persons in a specific language group that requires language assistance, BRIDGES 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 BRIDGES 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 BRIDGES will incorporate components that encourages feedback from customers on their

experience with the implementation of the Language Assistance Plan. Based on the input received, BRIDGES 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, BRIDGES 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***

BRIDGES 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 BRIDGES'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**

BRIDGES has no transit-related, non-elected committees or advisory councils.

### ***Efforts to Encourage Minority Representation on Boards and Committees***

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

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

## **B8. Recordkeeping and Reporting**

BRIDGES 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.

BRIDGES 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. BRIDGES will review its Title VI Plan at least once every three years to determine if modifications are necessary. BRIDGES 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</b> (Review-Update- Addendum- Adoption- Distribution)	<b>Person Responsible</b>	<b>Remarks</b>
MONTH XX, 20XX	Adopted and distributed	Name	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
MONTH XX, 20XX	Annual review of implementation	Name	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
MONTH XX, 20XX	Annual review of implementation	Name	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
MONTH XX, 20XX	Updated plan, adopted and distributed	Name	Verified all employees received training and copies of Title VI policy. Verified intake materials, postings

### ***Program Monitoring***

The BRIDGES will monitor the effectiveness of the Title VI program through the feedback from clientele, employees, general public and other agencies (NYSDOT, FTA). BRIDGES 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, BRIDGES 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 BRIDGES 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, BRIDGES 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 BRIDGES was required to, completed, and included a Title VI equity analysis with this Title VI Plan update.

Did BRIDGES construct, expand or acquired a facility in the past three years?

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

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

- ☒ **No.** BRIDGES does not plan to construct, expand or acquire a facility.
- ☐ **Yes.** BRIDGES plans to (construct, expand or acquire) a facility.

If yes, was a Title VI equity analysis completed?

- ☐ **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**

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

### **Vehicle Headway Standard**

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

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

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

### **On Time Performance Standard**

A vehicle is considered on time if it departs a scheduled timepoint no more than XX minutes early and no more than XX minutes late. The BRIDGES on-time performance objective is XX percent or greater. The BRIDGES 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**

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

And the following service policies information:

## **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. BRIDGES service policies are:

### **Transit Amenities Policy**

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

### **Vehicle Assignment Policy**

Vehicle assignments take into account 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**

## BRIDGES Title VI Plan Board Approval

On behalf of Rockland Independent Living Center dba BRIDGES, we the Board have reviewed and adopted the BRIDGES 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 BRIDGES 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:** November 3, 2025

**Adopted:** November 3, 2025

**Adopted By:** Rockland Independent Living Center dba BRIDGES Board

**Revised:** \_\_\_\_\_

**Adopted By:** \_\_\_\_\_

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

## BRIDGES 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:				
<b>I believe the discrimination I experienced was based on (check all that apply):</b> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability				
<b>Date of Alleged Discrimination (Month, Day, Year):</b> _____				
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"/> Yes <input type="checkbox"/> No</p> <p><i>If yes, check all that apply:</i></p> <p><input type="checkbox"/> Federal Agency: _____</p> <p><input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____</p> <p><input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____</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><b>Address:</b></p> <p><b>Telephone:</b></p>	

**You may attach any written materials or other information that you think is relevant to your complaint.**

**Signature and date required below.**

\_\_\_\_\_

**Signature**

\_\_\_\_\_

**Date**

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

BRIDGES  
 Title VI/ADA Coordinator  
 2290 Palisades Center Drive  
 West Nyack, NY 10994  
 smitchellweed@bridgesrc.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 BRIDGES 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 (845)624-1366 or in writing to BRIDGES, 2290 Palisades Center Drive, West Nyack, NY 10994 or email [smitchellweed@bridgesrc.org](mailto:smitchellweed@bridgesrc.org).

Sincerely,

Sarah Mitchell Weed

Title VI Coordinator

2290 Palisades Center Drive

West Nyack, NY 10994

(845)624-1366

## **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 BRIDGES 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.

BRIDGES 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,

Sarah Mitchell Weed

Title VI Coordinator

2290 Palisades Center Drive

West Nyack, NY 10994

(845)624-1366

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

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated \_\_\_\_\_ against BRIDGES alleging Title VI violation has been investigated. The investigation determined non-compliance by BRIDGES in administering the Title VI obligations of nondiscrimination in the programs and services we administer. Immediate efforts are underway to correct the findings.

Thank you for bringing this important matter to our attention. You were extremely helpful during our review of the program to correct our implementation of the Title VI Program. If I can be of assistance to you in the future, do not hesitate to call me at \_\_\_\_\_.

Sincerely,

Sarah Mitchell Weed

Title VI Coordinator

2290 Palisades Center Drive

West Nyack, NY 10994

(845)624-1366

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



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

### BRIDGES

The **BRIDGES** 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 **BRIDGES**.

For more information on the **BRIDGES**'s program, and the obligations and procedures to file a complaint, contact (845)624-1366; email [smitchellweed@bridgesrc.org](mailto:smitchellweed@bridgesrc.org) or visit our office at BRIDGES, 2290 Palisades Center Drive, West Nyack, NY 10994. For more information on how to contact **BRIDGES** to find out about Title VI, visit [www.bridgesrc.org](http://www.bridgesrc.org).

A complainant may file a complaint directly with **BRIDGES** TITLE VI Coordinator by following the **BRIDGES** 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 (845)624-1366.

*Si necesita información en otra idioma, por favor contacto (845)624-1366.*