

DRAFT
PENDING LEGISLATIVE
REVIEW AND ADOPTION

Oneida County
Title VI Plan for Mobility Management
Program

Date Adopted: Month Day, Year

TABLE OF CONTENTS

1. Program Description and Services	2
2. Oneida County Title VI Plan	2
1. Oneida County Title VI Policy	3
2. Title VI Public Notice	3
3. Title VI Complaint Procedures and Complaint Form	4
4. Transit Related Title VI Complaints, Investigations, and Lawsuits	6
5. Public Involvement Process	6
6. Language Assistance Plan	8
7. Minority Representation on Advisory Boards	15
8. Recordkeeping and Reporting	16
9. Plan and Policy Review	17
10. Facility Location Equity Analysis	18
3. List of Appendices	i
APPENDIX 1: Documentation of Board Approval	ii
APPENDIX 2: Title VI Complaint Form	iv
APPENDIX 3: Letter Acknowledging Receipt of Complaint	vii
APPENDIX 4: Title VI Complaint Letter of Closure	viii
APPENDIX 5: Title VI Complaint Letter of Finding	x
APPENDIX 6: Title VI Notice to the Public	xi
APPENDIX 7: Title VI Log	xii
APPENDIX 8: LEP Log	xiii

1. 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. Oneida County is a subrecipient of FTA financial assistance through a NYSDOT grant. This Title VI plan details how Oneida County incorporates nondiscrimination policies and practices into its mobility management program.

Oneida County is a governmental agency that receives FTA Section 5311 funding through NYSDOT to provide mobility management services within the County of Oneida. Oneida County primarily receives program funds from NYSDOT and FTA Section 5311 funding to provide Mobility Management resources within Oneida County, serving as conveners to bring together stakeholders with a shared interest in transportation to identify barriers and problem-solve solutions. As policy coordinators, mobility managers help communities develop coordination plans, programs, and policies, and build local partnerships. Oneida County also promotes land-use policies that favor transit-oriented development, public transportation, and safe pedestrian access. Oneida County serves all transportation providers in the region, maintains an agency concierge service in the testing phase, and works to inform inquiries about the available services to meet their mobility needs.

Oneida County offices operate from 8:30 am to 4:30 pm Monday – Friday and are located at 321 Main Street, 3rd Floor, Utica, NY.

2. ONEIDA COUNTY TITLE VI PLAN

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 and/or 5311 funds, Oneida County's 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 who reviewed and approved the Title VI Program.

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

1. Oneida County Title VI Policy

The Oneida County commits to comply with Title VI of the Civil Rights Act of 1964, which 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 5311 agreement between Oneida County and NYSDOT, as well as any related agreements the agency may have with third-party contractors.

For more information on Oneida County's Title VI program contact:

Title VI Coordinator
Oneida County
Commissioner of Personnel – Charles P. Klein
800 Park Avenue
Utica, NY 13501
Phone 315-798-6490/TDD
Personnel@oneidacountyny.gov

2. Title VI Public Notice

The Oneida County Notice to the Public is shown in Appendix 6 and posted in the following locations:

- Agency website at:
<https://oneidacountyny.gov/departments/planning/transportation/oneida-county-mobility-management-program/>
- Public areas of the agency office – Oneida County Department of Planning, Union Station, 3rd Floor, 321 Main Street, Utica, NY 13501 at the front desk (Public areas mean common area, public meeting rooms, etc.).
- Inside transit vehicles (required by NYSDOT) – Provided by the Central New York Regional Transit Authority (CENTRO), Oneida County does not own transit vehicles

The Title VI Notice provided on the following page is the official notification posted to notify individuals of their Title VI rights.

Oneida County provides Title VI notices as per the "Safe Harbor" guidance, which states that language or translation assistance should be provided for each eligible language group that constitutes at least five (5) percent of 1,000 LEP individuals of the population of persons eligible to be served or likely to be affected or encountered, whichever is less. Based on the demographic data analysis, multiple LEP populations (Spanish, Bosnian, Karen) meet this threshold.

In addition to notifying citizens of their rights, Oneida County has examined the language needs of its ridership in its Language Assistance Plan and has produced public materials to meet the identified language needs of its riders. All planning activities and press-advertised notices are also shared with news sources serving LEP communities.

Title VI Notice

Oneida County 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 Oneida County.

For more information on Oneida County's program, and the obligations and procedures to file a complaint, contact the Commissioner of Personnel, Charles P. Klein at 315-798-5726; email: personnel@oneidacountyny.gov; or visit our office at Oneida County, 800 Park Avenue Utica, NY 13051 For more information on how to contact Oneida County to find out about Title VI, visit www.oneidacountyny.gov.

A complainant may file a complaint directly with Oneida County TITLE VI Coordinator by following the Oneida County 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 315-798-5710.

Si necesita información en otra idioma, por favor contacto 315-798-5710.

3. Title VI Complaint Procedures and Complaint Form

Oneida County's Title VI Complaint Procedure is available in the following locations:

- Agency website at:
<https://oneidacountyny.gov/departments/planning/transportation/oneida-county-mobility-management-program/>
- Hard copy in the central office

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 2*) to the address below.

Oneida County
Title VI Coordinator – Commissioner of Personnel
800 Park Avenue
Utica, NY 13501
Phone 315-798-6490
personnel@oneidacountyny.gov

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

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

1. Acknowledge receipt of the complaint within 10 days (*Appendix 3*)
2. Determine if Oneida County 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 Oneida County 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, Oneida County 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 4*)
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 5*)

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 a complaint with Oneida County enables the agency to properly investigate it. 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 Oneida County at 315-798-5710.

Si se necesita información en otro idioma, por favor contacto, 315-798-5710.

4. Transit Related Title VI Complaints, Investigations, and Lawsuits

Oneida County maintains a log of all Title VI complaints, investigations, and lawsuits pertaining to its transit-related activities since the last Title VI plan update.

There have been no investigations, complaints, and/or lawsuits filed against Oneida County during the reporting periods in 2023, 2024, or 2025.

5. Public Involvement Process

Strategies and Desired Outcomes

This section describes how Oneida County disseminates vital agency information and engages the public in the decision-making process for transportation services. We 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.

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 Oneida County's decision-making process, Oneida County implements early, frequent and continuous engagement for public involvement. The engagement methods include and are not limited to:

1. Posting public involvement notifications on transit vehicles, Oneida County buildings, and on the Oneida County 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).
5. Coordinate with local community organizations, including houses of worship, community groups and publications, and other local partners.

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

Summary on Public Involvement Activity

Prior to the development of the Oneida County Mobility Management Title VI Plan, Oneida County had not maintained a standalone Title VI Plan specific to its mobility management program. The County had previously relied on the Title VI policies and procedures of its contracted public transportation provider, the Central New York Regional Transportation Authority (CNYRTA), commonly referred to as CENTRO.

As this is the County's first Title VI Plan for the mobility management program, no transit-specific public involvement activities have been conducted to date. This includes Title VI-related outreach through email, website postings, media notices, in-person meetings, or virtual public engagement sessions. Going forward, Oneida County will document and maintain records of any public involvement activities associated with the mobility management program, including outreach methods used, meeting materials, public comments received, and any follow-up actions taken.

Oneida County has undertaken related coordination and information-gathering activities for its mobility management program. These activities have included efforts to obtain survey feedback from riders and community members, coordination with HOCTC planning staff on broader transportation-related engagement, and meetings of the Regional Mobility Coordination Council. The Council includes partner agencies and public representation, including a rider advocate, and serves as an ongoing forum to identify mobility needs, discuss service coordination, understand transportation barriers, and inform mobility management priorities. A summary of these related mobility management engagement and coordination activities is provided in the table below.

Event Name	Date (Month, Day, Year)	Brief Description of Event Purpose	Communication Methods to Notify Public	Summary of Attendance
Regional Mobility Coordination Council (RMCC)	11/18/2025	This was the first meeting of the RMCC and it was held to identify challenges and opportunities in transportation	Email	Representatives from HOCTC, Transpo Group, CENTRO, Oneida County, human service providers, rider/community representatives, and mobility partners
RMCC Meeting #2	01/20/2026	Mobility gaps identified, HSTP feedback, presentation on the mobility concierge service	Email	Representatives from HOCTC, Transpo Group, CENTRO, Oneida County, human service providers, rider/community representatives, and mobility partners
RMCC Meeting #3	05/27/2026	Mobility management update, member feedback, priorities for the RMCC discussion	Email	Representatives from HOCTC, Transpo Group, CENTRO, Oneida County, human service providers, rider/community representatives, and mobility partners
Survey	May 2026 – ongoing	Tabling events for various transportation planning projects. It is a public transit community survey.	In person via QR code or paper copy	Will be distributed to the public at public engagement tabling events throughout 2026.

RMCC Meeting #4	05/27/2026	Recap identified needs, presentation by CENTRO, discuss other transportation options, group discussion about area specific rural transportation options.	Email	Representatives from HOCTC, Transpo Group, CENTRO, Oneida County, human service providers, rider/community representatives, and mobility partners
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6. Language Assistance Plan

To comply with the FTA Title VI requirement on nondiscrimination based on national origin, as it affects limited English proficient (LEP) persons, Oneida County will take reasonable steps to ensure meaningful access to our programs and activities by persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

The Language Assistance Plan for Oneida County is based on a Four Factor Analysis that describes the demographic characteristics of our service area, the frequency with which riders use our services, and the importance of our transportation services. These three factors identify the need for language assistance and are balanced with a fourth factor, that of the available resources with which to provide language assistance to result in an assistance plan to address the identified needs of the LEP population(s) served.

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, Oneida County has conducted a Four Factor Analysis¹: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

1. **Demography**: A number or proportion of the LEP population(s) specifically served or that could be served by Oneida County's mobility management program.
2. The **frequency** with which LEP persons come into contact with Oneida County.
3. The nature and **importance** of Oneida County 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.

Oneida County's 5311 mobility management program provides access to transportation resources vital for residents in both Oneida and Herkimer Counties. These resources help connect people to medical care, jobs, education, shopping, social services, and other key destinations.

Although the program is managed by Oneida County, the mobility management effort is regional and supports transportation coordination throughout the Herkimer-Oneida area. Herkimer County is part of the same Metropolitan Planning Organization planning area as Oneida County, the Herkimer-Oneida Counties Transportation Council. Therefore, Herkimer County demographics were included in the Limited English Proficiency analysis to better represent the

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

broader population that may be served, supported, or impacted by the 5311 mobility management program.

Including both counties provides a more complete understanding of potential language assistance needs across the regional mobility management service area and supports Oneida County in planning for meaningful access to transportation information, coordination of resources, and future public-facing mobility tools.

Our analysis is based on:

- Herkimer-Oneida Counties Transportation Council (HOCTC) Human Services Transportation Plan (HSTP)
- American Community Survey 2020 – 2024 5-year estimates

Factor 1–Demography

According to 2020-2024 American Community Survey data, Oneida County’s mobility management service area (which includes Herkimer County) has a total population of 273,540 individuals age 5 and older. Of this population, 88.4 percent speak only English, while the remaining speak other languages, either in addition to or instead of English. LEP population is characterized as people who speak a language other than English at home and speak English less than “very well”. Approximately 4.5 percent of people in the service area speak English less than “very well,” of whom the largest share speaks some other Indo-European language as their primary language (information gathered from the HSTP indicates Bosnian is a prominent language among this group). The table below presents the language breakdown of LEP individuals, showing both the total number of individuals who speak each language and the proportion of the total service area population.

The “Safe Harbor” guidance states that language or translation assistance should be provided for each eligible language group that constitutes at least five (5) percent of 1,000 LEP individuals of the population of persons eligible to be served or likely to be affected or encountered, whichever is less. Based on the analysis of census data and due to the large service area size, all four census-determined language groups have over 1,000 LEP individuals. Information from the HOCTC HSTP shows that the main specific LEP languages are Spanish, Bosnian, and Karen.

Language Group	LEP Population	Percent
Spanish	3,142	1.1%
Asian and Pacific Islander	4,545	1.7%
Other Indo-European	3,534	1.3%
Other	1,184	0.4%
Total	12,405	4.5%

The geographic breakdown of LEP individuals within the Oneida County Mobility Management service area (including Herkimer County) is depicted Figure 1 below. As shown, LEP populations are more heavily concentrated in the urban areas around Utica and Rome.

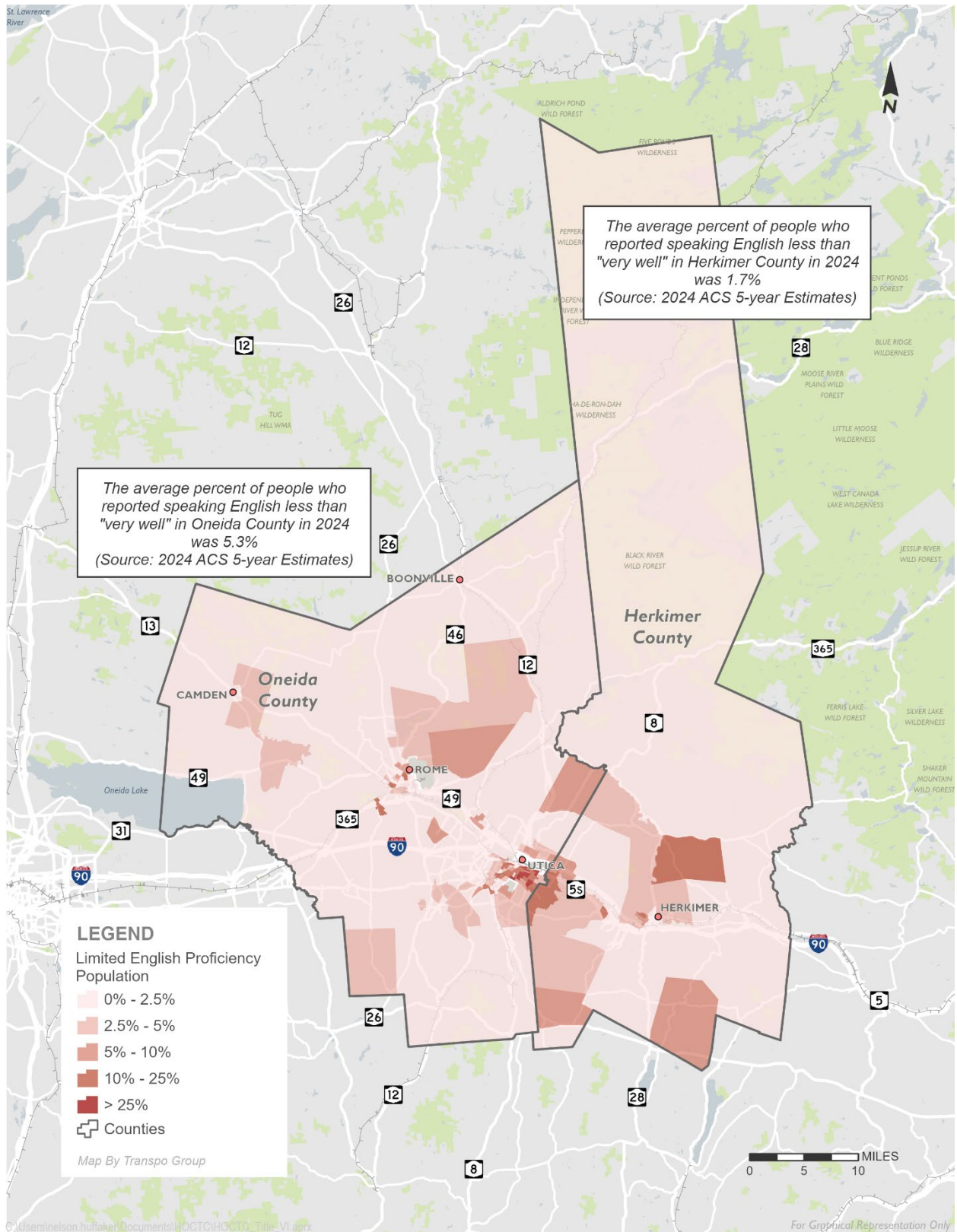


Figure 1: Service Area Distribution of LEP Populations

Factor 2–Frequency

Oneida County does not directly operate public transportation services or provide direct rider-facing transportation under the 5311 mobility management program. Instead, these functions are carried out by the County's contracted transportation provider, the Central New York Regional Transportation Authority, commonly known as Centro. Consequently, routine public-facing activities such as rider intake, trip scheduling, customer service, service notices, and everyday rider communications are generally managed by CENTRO or other partner agencies, rather than by Oneida County's mobility management staff.

The County's mobility management role currently focuses on supporting government agencies and partner organizations that work directly with clients. The program acts as a concierge and coordination resource for agency staff rather than as a direct public intake or trip-scheduling service. Therefore, direct interaction between Oneida County mobility management staff and the general public, including individuals with Limited English Proficiency, is expected to be limited under the current program structure.

Because the program is not currently public-facing, Oneida County has not identified frequent direct contact with LEP individuals through the 5311 mobility management program. However, the County will continue to monitor the frequency and nature of any LEP contact related to the program. This may include language assistance requests received directly by County staff, requests communicated through CENTRO or partner agencies, inquiries related to transportation information, complaints or Title VI concerns, and language needs identified through outreach or program development activities.

Oneida County may develop a public trip-planning tool. Once launched, this tool could expand the program's direct public role and provide more opportunities for LEP individuals to access mobility management information. During the development and rollout of the trip planner, Oneida County will assess language support needs, including translated notices, multilingual instructions, website accessibility, and procedures for requesting oral interpretation or other language services. The County will revise this Title VI Plan and Language Assistance Plan, as needed, to reflect any changes in contact with LEP persons resulting from the launch of the public trip planner.

Factor 3– Factor 3: Importance of the Program, Activity, or Service to LEP Persons

Oneida County's 5311 mobility management program facilitates access to transportation resources critical to the daily lives of residents in Oneida and Herkimer Counties. This includes older adults, individuals with disabilities, people without personal vehicles, low-income residents, and others who depend on public or human service transportation. Having access to transportation can influence a person's ability to reach medical care, employment, education, human services, shopping, social activities, and other essential destinations.

Currently, Oneida County does not directly operate public transportation services or provide rider-facing transportation under the 5311 mobility management program. Instead, the county's contracted transportation provider, the Central New York Regional Transportation Authority (CENTRO), or partner agencies that work directly with clients generally handle public transportation operations, rider communication, trip scheduling, customer service, and daily interactions with the public.

The County's current mobility management role is focused on supporting governmental agencies and partner organizations that assist clients with transportation needs. Although Oneida County mobility management staff do not routinely interact directly with the general

public, the information, coordination, and technical assistance provided through the program can still be important to LEP individuals because partner agencies may use these resources to help clients understand available transportation options and connect to appropriate services.

Because transportation access is essential to participation in daily life, Oneida County will continue to support reasonable language assistance measures for the 5311 mobility management program. Language assistance may include oral interpretation, use of a language line, translation of key materials, coordination with CENTRO or partner agencies, and other suitable measures, based on the nature of the request and the identified needs.

Oneida County is considering developing a public-facing trip-planning tool. If launched, this tool could underscore the need for additional language access within the mobility management program, as the public, including LEP individuals, may use it directly to find transportation options provided within the region. During the development and deployment of the trip planner, Oneida County will assess language support needs and add suitable language access features, such as translated notices, multilingual instructions, accessible web content, and procedures for requesting oral interpretation or translation help.

Based on the current program structure and the limited level of direct public interaction, Oneida County has not identified unmet language assistance needs within the 5311 mobility management program. However, the County will continue to monitor language assistance requests, feedback from CENTRO and partner agencies, public inquiries, complaints, and the use of future public-facing tools to determine whether additional language assistance measures are necessary.

Factor 4—Resources and Costs

Oneida County will utilize available and reasonable resources to address language assistance needs related to its 5311 mobility management program. Since the program is not currently a direct public-facing transportation service, the demand for routine language assistance from County mobility management staff is expected to be minimal under the current program structure. Public-facing transportation services, rider communication, customer service, and trip scheduling are typically handled by the County's contracted transportation provider, the Central New York Regional Transportation Authority (CENTRO), or by partner agencies that work directly with clients.

Oneida County will work with CENTRO, government agencies, human service providers, and other partner organizations to identify language assistance needs that may occur through the 5311 mobility management program. Available resources could include bilingual staff, oral interpretation services, language identification tools, translated notices, translated vital documents, website translation tools, and language assistance resources offered by state, local, or partner agency programs.

Where appropriate, Oneida County may utilize professional interpretation or translation services to improve LEP access to the mobility management program. This could include translating vital documents, interpreting for meetings or public activities, providing language assistance for transportation information requests, or supporting Title VI complaints and related communications. The County will decide the appropriate level of language assistance based on the nature of the program activity, how often contact occurs with LEP individuals, the importance of the information or service, and the resources available.

In developing a public-facing trip-planning tool, Oneida County will assess language assistance needs and related costs before rollout. This may include translating key trip-planning instructions, creating multilingual notices about language support, improving website accessibility and translation features, and establishing procedures for requesting oral interpretation or translation help. If the trip planner results in increased direct public interaction with LEP individuals, the County will reevaluate whether additional language assistance resources are necessary.

Based on the current program structure, Oneida County expects that language assistance costs will be manageable and covered using available program resources, partner coordination, and targeted translation or interpretation services when necessary. The County will continue monitoring language assistance requests, complaints, public inquiries, and feedback from CENTRO and partner agencies to determine whether additional resources or budget adjustments are needed.

Results of the Four Factor Analysis

Based on the Four Factor Analysis, Oneida County has determined that the current need for language assistance within the 5311 mobility management program is limited, but language assistance procedures remain essential to ensure meaningful access for individuals with Limited English Proficiency.

Oneida County does not directly operate public transportation services or provide rider-facing transportation under the 5311 mobility management program. Instead, direct public transportation operations, rider communication, trip scheduling, customer service, and daily interactions are usually handled by the County's contracted transportation provider, the Central New York Regional Transportation Authority (CENTRO), or by partner agencies that work directly with clients. Currently, the County's mobility management role mainly supports governmental agencies and partner organizations that help individuals with transportation needs.

Based on available demographic information and the current structure of the program, Oneida County has not identified an LEP language group that represents 5 percent or more of the population specifically served, or likely to be served, by the 5311 mobility management program. In addition, because the program is not currently public-facing, direct contact between Oneida County mobility management staff and LEP individuals is expected to be infrequent.

However, transportation information and mobility management support can be crucial for individuals who depend on public transportation, human service transportation, or other mobility options to reach medical care, employment, education, shopping, social services, and other vital destinations. For this reason, Oneida County will make reasonable efforts to offer language assistance when necessary. Such assistance may include oral interpretation, written translation of essential information, language identification tools, coordination with CENTRO or partner agencies, and other appropriate measures depending on the nature of the request and available resources. Language assistance will be provided at no cost to the individual requesting help.

Oneida County will also continue to coordinate with CENTRO, government agencies, human service providers, and other partner organizations to identify language assistance needs that may develop through the 5311 mobility management program. The County will track language assistance requests, Title VI complaints, public inquiries, outreach efforts, and feedback from partner agencies to determine if additional language support is necessary.

Oneida County is developing a public-facing trip-planning tool that may increase direct interaction between the mobility management program and the public, including LEP individuals. As this tool is developed and implemented, the County will evaluate language assistance needs related to the tool, including translated notices, multilingual instructions, accessible web content, and procedures for requesting oral interpretation or translation assistance.

Oneida County will reevaluate the Four Factor Analysis at least twice a year, or sooner if there is a significant change in the population served, the nature of the mobility management program, the launch of a public-facing service or tool, a documented increase in LEP contacts, or other circumstances suggesting that additional language assistance measures might be needed.

Providing Language Assistance Services

Oneida County will provide language assistance, as needed, to support meaningful access for individuals with Limited English Proficiency, including Spanish-, Bosnian-, and Karen-speaking populations identified through the County's language access review. Language assistance may include oral interpretation, written translation of key materials, website-based translation tools, translation applications, multilingual staff support, and coordination with community-based organizations that serve LEP populations.

Oneida County also provides translation and interpretation services as needed. These services can be used to translate written materials, support direct communication with LEP individuals, or provide phone interpretation upon request. This enables the County to meet language assistance needs even when multilingual staff or partner agency resources are not immediately available.

As appropriate, Oneida County will translate vital documents and key public-facing materials into Spanish, Bosnian, and Karen when required by applicable language access thresholds, the importance of the document, the nature of the program activity, and the needs of the populations served or likely to be served. The County will continue to monitor requests for language assistance, demographic data, feedback from partner agencies, and public-facing program activities to assess whether additional translated materials or interpretation resources are necessary.

Informing LEP Populations of the Availability of Language Assistance

Language assistance and Title VI information related to public-facing transit services are provided and communicated through Oneida County's contracted public transportation provider, the Central New York Regional Transportation Authority (CENTRO). CENTRO maintains its own Title VI Plan and distributes required Title VI notices, language assistance details, complaint procedures, and related civil rights assurances through its established public communication channels. This includes, as applicable, information posted onboard vehicles, at customer service locations, on public-facing materials, and via other rider communication methods used by CENTRO.

Oneida County acknowledges CENTRO's role as the contracted transit provider responsible for direct rider-facing communications, including onboard notices and public information related to transit operations. Since Oneida County does not directly operate transit services or provide direct rider-facing transportation under the 5311 mobility management program, routine onboard notices, vehicle postings, and direct transit customer communications are managed by CENTRO in accordance with its Title VI Plan and relevant federal requirements.

For Oneida County's mobility management program, Title VI notices, language assistance information, complaint procedures, and other related publications are made available through the Herkimer-Oneida Counties Transportation Council website and other County or program communication channels, as applicable. Oneida County may also share language assistance information through partner agencies, governmental organizations, community-based organizations, outreach materials, public meetings, surveys, or other program-related communications when such activities are conducted as part of the 5311 mobility management program.

Oneida County will continue collaborating with CENTRO and partner agencies to ensure consistent communication about Title VI rights and language assistance across the mobility management program and related public transportation services.

Updating the Language Assistance Plan

Oneida County will monitor the effectiveness of the language assistance to determine if enhancements on the methods (translating vital documents, interpretations and website) are required to better communicate with the LEP population. If there are updates to the Language Assistance Plan within the Human Service – Public Transportation Coordination Plan, Oneida County will review them and identify those with an 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

Oneida County employees are oriented on the principles of Title VI and language assistance at hire and when the Title VI plan is updated. New employees will be provided guidance on the needs of clients served and how best to meet their language needs. 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 and Language Assistance Plan

If an employee needs further assistance related to LEP individuals, they will work with the Oneida County's Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.

7. Minority Representation on Advisory Boards

Oneida County recognizes that diverse representation on advisory committees, councils, and boards helps support more informed, equitable, and responsive transportation decision-making. The County encourages participation from riders, partner agencies, human service organizations, community-based organizations, advocates, and interested members of the public, including individuals and organizations representing minority populations, individuals with Limited English Proficiency, older adults, individuals with disabilities, low-income residents, and other transportation-disadvantaged communities.

Oneida County does not require members of non-elected boards, committees, or councils to disclose their race, ethnicity, national origin, language, or other demographic characteristics. Any demographic information provided by members is voluntary. The County's approach aims to respect individual privacy while promoting inclusive participation and diverse community representation.

Within the mobility management program, the Regional Mobility Coordination Council (RMCC) offers a key forum for rider representation and stakeholder engagement. The RMCC includes organizations that work directly with riders and clients, such as agencies and community partners serving minority communities, LEP populations, older adults, individuals with disabilities, and other groups facing transportation barriers. This structure helps guarantee that mobility needs are recognized through the viewpoints of both transportation users and the organizations that serve them.

As vacancies or participation opportunities become available on boards, committees, or councils related to the mobility management program, Oneida County will make reasonable efforts to encourage broad and diverse participation. These efforts may include outreach to community-based organizations, human service agencies, advocacy groups, minority-serving organizations, organizations serving LEP populations, and other local partners. The County may also use public notices, partner communications, meeting announcements, and direct outreach to encourage participation from individuals and organizations that reflect the service area's diversity.

Oneida County's efforts to promote diverse representation are not meant to set quotas or require disclosure of protected characteristics. Instead, the County aims to offer meaningful opportunities for participation and to ensure that transportation planning and mobility management decisions are shaped by a wide range of community perspectives.

8. Recordkeeping and Reporting

Oneida County will maintain records documenting the implementation of its Title VI Program for the 5311 mobility management efforts. These records will be stored in a way that allows the County to monitor the program's progress, answer information requests, identify language assistance requirements, document public involvement activities, and prove compliance with applicable federal and state civil rights laws.

Records kept by Oneida County may include, but are not limited to, documentation of Title VI Plan adoption and approval, staff training materials and attendance records, public involvement activities, Title VI notices, language assistance requests, translated materials, complaints, investigations, resolutions, correspondence with the New York State Department of Transportation, and other activities related to Title VI compliance.

To support ongoing monitoring, Oneida County will keep a Language Assistance Request Log for the 5311 mobility management program. This log will record requests for oral interpretation, written translation, language line assistance, translated materials, or other language aid services. It may include details such as the date of the request, the language requested, the type of assistance needed, the contact method, the program activity involved, whether assistance was provided, resources used, and follow-up actions taken. This information will help the County assess if language assistance needs are changing over time and determine if additional translated materials, interpretation services, or other language support resources are necessary.

Oneida County will also maintain a separate Title VI Complaint Log for complaints related to the 5311 mobility management program. This log will document complaints alleging discrimination based on race, color, or national origin. Information tracked may include the date the complaint was received, the nature of the allegation, the involved program or activity, the status of the complaint, the investigation steps, the resolution, any corrective actions, if needed, and the date of closure. If a complaint is received by CENTRO, HOCTC, or another partner agency related to

Oneida County's 5311 mobility management program, the County will coordinate with the appropriate entity and document the complaint or follow-up actions, as appropriate.

Oneida County will coordinate with the Herkimer-Oneida Counties Transportation Council and CENTRO, as applicable, to review Title VI procedures, complaint processes, public notification practices, language assistance resources, and operational practices relevant to the mobility management program. HOCTC's Title VI and nondiscrimination procedures may provide guidance for public involvement, transportation planning, and nondiscrimination notices. CENTRO's Title VI procedures may provide guidance for rider-facing transit operations, including onboard notices, customer communications, language assistance availability, and complaint procedures. This coordination will help ensure that Oneida County's mobility management procedures remain consistent with applicable Title VI requirements and aligned with related transportation programs in the region.

The County will periodically review its Title VI records, language assistance requests, complaints, public involvement documentation, and coordination procedures to determine whether updates to the Title VI Plan or Language Assistance Plan are needed. This review may include confirming that public notices are current, that complaint procedures identify the appropriate points of contact, that language assistance information is available through relevant communication channels, and that procedures are clear when a request or complaint involves CENTRO, HOCTC, or another partner agency.

Oneida County will review and update its Title VI Plan for the 5311 Mobility Management program at least once every three years, or sooner if there are significant changes to the program's services, public-facing services, language assistance needs, complaint procedures, or applicable Title VI requirements. The updated Title VI Plan will be submitted to the New York State Department of Transportation for review and approval, consistent with NYSDOT requirements for recipients and subrecipients of Federal Transit Administration funding.

9. Plan and Policy Review

Oneida County will review and update its Title VI Plan for the 5311 mobility management program at least once every three years, or sooner if there are significant changes to the program, public-facing services, language assistance needs, complaint procedures, or relevant federal or state civil rights requirements.

Prior to the development of the Oneida County Mobility Management Title VI Plan, the county did not have a standalone Title VI plan specific to its mobility management program. Previously, the county relied on the Title VI policies and procedures of its contracted public transportation provider, the Central New York Regional Transportation Authority, commonly known as CENTRO. With this plan's adoption, Oneida County will start formal monitoring of Title VI implementation related to the 5311 mobility management program.

The Title VI Plan and related policies will be shared with relevant County and consultant support staff involved in managing or implementing the mobility management program. Title VI information will be included during new employee orientation, when applicable, and whenever the Title VI Plan is updated. Oneida County will also provide periodic updates or refresher sessions to relevant staff to raise awareness of Title VI responsibilities, complaint procedures, language assistance procedures, public notice requirements, and recordkeeping standards.

Since Oneida County does not directly provide public transportation or currently employ rider-facing services through the 5311 mobility management program, the annual review will focus on the program's administrative, coordination, and oversight aspects. This review may involve ensuring that staff have access to the current Title VI Plan, that Title VI notices and complaint

procedures are posted or accessible through appropriate County or HOCTC channels, that language assistance procedures are up to date, and that complaint and language assistance logs are properly maintained. It will also verify that coordination procedures with CENTRO, HOCTC, and partner agencies are clear.

Oneida County will also coordinate with CENTRO, as the contracted public transportation provider, to confirm that public-facing Title VI information related to transit operations is maintained through CENTRO's established rider communication channels. This may include onboard notices, customer service information, complaint procedures, language assistance information, and other Title VI-related materials used for direct rider-facing transit services.

During each three-year update of the Title VI Plan, Oneida County will review implementation activities, public involvement efforts, language assistance requests, Title VI complaints, staff training records, coordination with partner agencies, and any changes to the mobility management program. The review results will help decide if updates are needed for the Title VI Plan, Language Assistance Plan, complaint procedures, public notices, or implementation practices.

Title VI Plan Monitoring – Activity Log Example

Date	Activity (Review-Update- Addendum- Adoption- Distribution)	Person Responsible	Remarks
XX	<u>Adopted and distributed</u>	Jane Doe	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.

Program Monitoring

The County will monitor the effectiveness of the Title VI program through feedback from clients, employees, the general public, and other agencies (NYSDOT, FTA). The County seeks opportunities to continuously improve its Title VI plan, public participation efforts, and providing meaningful access to services for LEP individuals.

10. Facility Location Equity Analysis

As a subrecipient of federal funds, the County understands that we are required to conduct a Title VI equity analysis when planning to acquire land to build a new transportation facility or expand an existing one. This analysis ensures that the location is selected without regard to race, color, or national origin. A facility includes storage, maintenance, and operations centers, but does not include bus shelters, transit stations, or power substations. The equity analysis requirement applies even to land purchased for a new facility that does not receive direct federal funding, as long as the County receives federal financial assistance; in such cases, Title VI requirements apply to all programs and activities. The analysis compares the equity impacts of various siting options and must be conducted during the planning stage, before choosing the preferred site. It must include the following details:

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 land acquired to build a new facility, the County will work with NYSDOT to ensure the completion and submission of the equity analysis to NYSDOT. The equity analysis will be provided upon request to NYSDOT, FTA, and during the triennial review.

The following is intended to guide the reader on whether the County was required to complete and include a Title VI equity analysis with this Title VI Plan update.

Did Oneida County acquire land to construct a transportation facility in the past three years? *(check the box next to the appropriate response below)*

- ☒ **No.** Oneida County has not acquire land to constructed a transportation facility.
- ☐ **Yes.** Oneida County did acquire land to construct a new transportation facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

Does Oneida County plan to acquire land to construct a new transportation facility in the next three years? *(check the box next to the appropriate response below)*

- ☒ **No.** Oneida County does not plan to acquire land to construct a new transportation facility.
- ☐ **Yes.** Oneida County plans to acquire land to construct a new transportation 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.
- ☐ **No.** A Title VI equity analysis was not completed.

If no, when will the Title VI equity analysis be completed?

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3. LIST OF APPENDICES

- 1 Documentation of Board Approval
- 2 Title VI Complaint Form
- 3 Letter Acknowledging Receipt of Title VI Complaint
- 4 Title VI Complaint Letter of Closure
- 5 Title VI Complaint Letter of Finding
- 6 Title VI Notice to the Public
- 7 Title VI Log
- 8 LEP Log

APPENDIX 1: Documentation of Board Approval

DRAFT

Oneida County Title VI Plan Board Approval

On behalf of the Oneida County Board of Legislators, we the Board have reviewed and adopted the County Title VI plan. We 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 subjected to discrimination under any County 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:

INSERT DATE

Adopted:

INSERT DATE

Adopted By:

ONEIDA COUNTY BOARD OF LEGISLATORS

Revised:

Adopted By:

APPENDIX 2: Title VI Complaint Form

Oneida County 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):

☐ Race ☐ Color ☐ National Origin ☐ Disability

Date of Alleged Discrimination (Month, Day, Year): _____

Agency name complaint is against: _____

Location of where the alleged discrimination occurred:- _____

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.

Section IV	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ☐ Yes ☐ No <i>If yes, check all that apply:</i> ☐ Federal Agency: _____ ☐ Federal Court: _____ ☐ State Agency: _____ ☐ State Court: _____ ☐ Local Agency: _____	
Provide information for the contact person at the agency/court where the complaint was filed.	
Name and Title: _____	
Agency: _____	
Address: _____	
Telephone: _____	

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.

Oneida County
Charles P. Klein, Commissioner of Personnel
800 Park Avenue
Utica, NY 13501
Personnel@oneidacountyny.gov

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 3: 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 Oneida County 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 315-798-5726 or in writing to Oneida County, 800 Park Avenue, Utica, NY 13501 or personnel@oneidacountyny.gov.

Sincerely,

Title VI Coordinator

Oneida County
Commissioner of Personnel or his/her designee
Charles P. Klein
800 Park Avenue
Utica, New York 13501

APPENDIX 4: Title VI Complaint Letter of Closure

DRAFT

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your Title VI complaint dated _____ against Oneida County 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.

Oneida County 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,

Name

Charles P. Klein, Commissioner of Personnel
800 Park Avenue
Utica, NY 13501
Personnel@oneidacountyny.gov

APPENDIX 5: Title VI Complaint Letter of Finding

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated _____ against Oneida County alleging Title VI violation has been investigated. The investigation determined non-compliance by Oneida County 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,

Name

Charles P. Klein, Commissioner of Personnel
800 Park Avenue
Utica, NY 13501
Personnel@oneidacountyny.gov

APPENDIX 6: Title VI Notice to the Public

Notifying the Public of Rights under Title VI and the ADA

Oneida County

Oneida County 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 Oneida County.

For more information on Oneida County's program, and the obligations and procedures to file a complaint, contact the Title VI Coordinator, Commissioner of Personnel, Charles P. Klien at 315-798-5726; email: personnel@oneidacountyny.gov; or visit our office at Oneida County, 800 Park Avenue Utica, NY 13051 For more information on how to contact Oneida County to find out about Title VI, visit www.oneidacountyny.gov.

A complainant may file a complaint directly with Oneida County TITLE VI Coordinator by following the Oneida County 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 315-798-5710.

Si necesita información en otra idioma, por favor contacto 315-798-5710.

APPENDIX 7: TITLE VI LOG

ONEIDA COUNTY – Title VI Investigations, Complaints, and Lawsuits Log								
NAME	ADDRESS	DATE OF FILING	ID NUMBER	DESCRIPTION	DEPARTMENT OR PERSON FORWARDED TO	ACTION TAKEN AND STATUS	DATE INVESTIGATION COMPLETED	DATE DISPOSED
COMPLAINTS								
INVESTIGATIONS								
LAWSUITS								

APPENDIX 8: LEP LOG

ONEIDA COUNTY – Limited English Proficiency (LEP) Service Log							
NAME	ADDRESS/ CONTACT INFORAMTION	DATE OF CONTACT	LANGUAGE SERVICE REQUUESTED	CONTACT STAFF	DEPARTMENT/ SERVICE/ PROGRAM AREA OF CONCERN	DETAILED SERVICE REQUEST	ACTION TAKEN OR MANNER IN WHICH THE QUESTION WAS ADDRESSED