



Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

August 4, 2025

Rocky Corigliano
Student Transportation of America
Birnie Bus Services
VP of Operations
1300 Floyd Ave
Rome, NY 13440

RE: 2025 CIVIL RIGHTS COMPLIANCE
REVIEW IN-COMPLIANCE

Dear Rocky,

The New York State Department of Transportation (NYSDOT), Office of Diversity and Opportunity (ODO), has completed its review of your 2025 FTA Title VI Program Plan. Subrecipients shall submit the information to the Department every three years.

At this time, our Office has concluded that the **Birnie Bus Services**, is currently found **In-Compliance** with all applicable Federal and State regulations mandated for a Title VI Program Plan. The next FTA Title VI review will be scheduled for 2028.

If we can be of future assistance, please do not hesitate to contact our office at (518) 457-1129.

Sincerely,

Sondra Little

Sondra Little
Director
Office of Diversity, Inclusion and Opportunity
50 Wolf Road, Albany, NY 12232



cc: D. Olori, Compliance Specialist II
Office of Diversity, Inclusion and Opportunity

Birnie Transit, Inc/Birnie Bus
Service, Inc
(Members of the STA Family)

TITLE VI Plan

Date Adopted: July 10, 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. Birnie Transit, Inc/Birnie Bus Service, Inc is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how Birnie Transit, Inc/Birnie Bus Service, Inc incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

Birnie Bus Service, Four County Line Run:

Birnie Transit, Inc/Birnie Bus Service, Inc receives FTA Section 5311 funding and provides a deviated fixed route service for the counties of **Oneida**, **Herkimer**, **Madison**, and **Onondaga**. The Four County Line run offers seven routes that operate Monday through Friday, 4:15am-9pm, and five routes on Saturday, 5:30am-8:40pm. The fare is zone based and ranges from \$1.10 to 6.10 for a one-way trip with discount fares available.

Lewis County Rural Transit:

Birnie Transit, Inc/Birnie Bus Service, Inc provides a deviated fixed route service for the county of **Lewis** (which receives FTA funding), with some limited service in Jefferson and Oneida Counties. Lewis County offers six routes that operate Monday through Friday, 6:10am-8pm, and one seasonal route to Old Forge, 7:45am-8:40pm. The fare is zone based and ranges from \$1.00 to 5.50 for a one-way trip with discount fares available.

Madison County Rural Transit System, Madison Transit System:

Birnie Transit, Inc/Birnie Bus Service, Inc provides a deviated fixed route service for the county of **Madison** which receives FTA funding. The Madison Transit System offers four routes that operate Monday through Friday, 5:45am-5:45pm. The fare is zone based and ranges from \$1.50 to 6.00 for a one-way trip with discount fares available.

Otsego County Transit System, Otsego Express:

Birnie Transit, Inc/Birnie Bus Service, Inc provides a deviated fixed route service for the county of **Otsego** which receives FTA funding. The Otsego Express offers six routes that operate Monday through Friday, 6am-6:40pm. The fare is \$1.00 for a one-way trip with discount fares available and \$2.00 for route deviations.

B. Birnie Transit, Inc/Birnie Bus Service, Inc TITLE VI PLAN

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5311 funds, Birnie Transit, Inc/Birnie Bus Service, Inc 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.)
- ✓ Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- ✓ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

The Birnie Transit, Inc/Birnie Bus Service, Inc shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

B1. Birnie Transit, Inc/Birnie Bus Service, Inc TITLE VI Policy

The Birnie Transit, Inc/Birnie Bus Service, Inc 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 5311 agreement between Birnie Transit, Inc/Birnie Bus Service, Inc and NYSDOT and third-party contractors.

For more information on Birnie Transit, Inc/Birnie Bus Service, Inc 's Title VI program contact:

Title VI Coordinator

Birnie Transit, Inc/Birnie Bus Service, Inc
Attn: Safety Manager
1300A Floyd Avenue, Suite B
Rome, New York 13440
Phone (315) 231-5602
Email: James.Caruso@Birniebus.com

B2. Title VI Public Notice

The Birnie Transit, Inc/Birnie Bus Service, Inc 's Notice to the Public is posted in the following locations:

- ☒ Agency website at: www.BirnieBus.com
- ☒ Public areas of the agency office (2245 Dwyer Ave, Utica, NY 13501)
- ☒ Inside transit vehicles

A sample of the notice posted is shown on the next page.

The Birnie Transit, Inc/Birnie Bus Service, Inc 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. Birnie Transit, Inc/Birnie Bus Service, Inc. 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 Birnie Transit, Inc/Birnie Bus Service, Inc .

For information on Birnie Transit, Inc/Birnie Bus Service, Inc 's Title VI policy or to obtain the Title VI complaint form and procedures visit our website at www.BirnieBus.com. Or contact:

Title VI Coordinator

Birnie Transit, Inc/Birnie Bus Service, Inc
Attn: Safety Manager
1300A Floyd Ave, Suite B
Rome, New York 13440
Phone (315) 231-5602
Email: James.Caruso@Birniebus.com

A complainant may also file a complaint directly with New York State Department of Transportation on its Civil Rights website at <https://www.dot.ny.gov/main/business-center/civil-rights/title-vi-ej>.

A complaint can also be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590

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

Si necesita información en otra idioma, por favor contacto 315-231-5602.

B3. Title VI Complaint Procedures and Complaint Form

The Birnie Transit, Inc/Birnie Bus Service, Inc 's Title VI Complaint Procedure is available in the following locations:

- ☒ Agency website at: www.BirnieBus.com
- ☒ Hard copy in the central office
- ☐ In client intake materials

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.

Birnie Transit, Inc/Birnie Bus Service, Inc
Title VI Coordinator
1300A Floyd Ave, Suite B
Rome, New York 13440
Phone (315) 231-5602
Email: James.Caruso@Birniebus.com

The complaint form is not required to file a complaint. The complainant may submit any written report as a complaint notice. Birnie Transit, Inc/Birnie Bus Service, Inc will make reasonable modifications and take information verbally if the complainant requires this accommodation.

The Birnie Transit, Inc/Birnie Bus Service, Inc investigates complaints received no more than 180 days after the alleged incident. Once the complaint is received, the Birnie Transit, Inc/Birnie Bus Service, Inc will follow the steps below:

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if the Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc at (315)-231-5602.

Si se necesita informacion en otro idioma por favor contacto, (315)-231-5602.

B4. Transit Related Title VI Complaints, Investigations and Lawsuits

The Birnie Transit, Inc/Birnie Bus Service, Inc 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's name. A case number is preferable.)

Reporting Period: **January 2021-December 2021**

Check One:

☒ There have been no investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc during the reporting period.

☐ There have been investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc . *See list below.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin)	Status (open/closed)	Disposition (finding/no finding)
Complaints				
1.				
2.				
3.				
Investigations				
1.				
2.				
3.				
Lawsuit				
1.				
2.				
3.				

The Birnie Transit, Inc/Birnie Bus Service, Inc 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's name. A case number is preferable.)

Reporting Period: **January 2022- December 2022**

Check One:

- ☒ There have been no investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc during the reporting period.
- ☐ There have been investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc . *See list below.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin)	Status (open/closed)	Disposition (finding/no finding)
Complaints				
1.				
2.				
3.				
Investigations				
1.				
2.				
3.				
Lawsuit				
1.				
2.				
3.				

The Birnie Transit, Inc/Birnie Bus Service, Inc 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's name. A case number is preferable.)

Reporting Period: **January 2023- December 2023**

Check One:

- ☒ There have been no investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc during the reporting period.
- ☐ There have been investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc . *See list below.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin)	Status (open/closed)	Disposition (finding/no finding)
Complaints				
1.				
2.				
3.				
Investigations				
1.				
2.				
3.				
Lawsuit				
1.				
2.				
3.				

The Birnie Transit, Inc/Birnie Bus Service, Inc 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's name. A case number is preferable.)

Reporting Period: **January 2024- December 2024**

Check One:

- ☒ There have been no investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc during the reporting period.
- ☐ There have been investigations, complaints and/or lawsuits filed against Birnie Transit, Inc/Birnie Bus Service, Inc . *See list below.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin)	Status (open/closed)	Disposition (finding/no finding)
Complaints				
1.				
2.				
3.				
Investigations				
1.				
2.				
3.				
Lawsuit				
1.				
2.				
3.				

B5. Public Involvement Process

Strategies and Desired Outcomes

Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc serves and/or are eligible to receive services.
- The type of transportation program and/or service Birnie Transit, Inc/Birnie Bus Service, Inc provides.
- The resources available to Birnie Transit, Inc/Birnie Bus Service, Inc for public outreach.

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

Birnie Bus Service/Birnie Transit, Inc. makes efforts to reach out to its community in the following ways: by attending various informational events, job fairs, county fairs, parades conducted by such agencies including the Department of Labor Workforce Centers, the Refugee Center in Utica, NY, the Rescue Mission of Rome and the Homeless Veterans Group. We also participate in multiple community based transit planning committees that allow for public comment, outreach and participation.

Notice of all public hearings that relate to public contracts held by Birnie Bus or its affiliates are posted on our website and on Facebook page to allow the community an opportunity to participate in such hearings. Title VI information flyers are displayed in all Birnie Bus Service/Tours/Transportation, Birnie Transit and AF Mulligan, Inc. revenue vehicles; and the Title VI plan is available on our website. The website has a translation ability that allows viewers to read most of the fixed content in another language. We have done advertising on the local Bosnian Radio, as a large population resides in our service areas. We employ bilingual individuals (Spanish, Bosnian, Russian, etc.) who assist in communication efforts to individuals with Limited English Skills.

Event Name	Date (Month, Day, Year)	Brief Description of Event Purpose	Outcome Methods	Summary of Attendance
Working Solutions Job Fair	Jan 15, 2024	Job fair for all businesses and job seekers for all of Central New York	Looking to hire drivers/monitors for all of our Birnie Bus locations.	Numerous Business across the Mohawk Valley and Central New York.
Working Solutions Job Fair	April 2, 2024	Job fair for all businesses and job seekers for all of Central New York	Looking to hire drivers/monitors for all of our Birnie Bus locations.	Numerous Business across the Mohawk Valley and Central New York.
WKTV Back to Work Job Opportunities	June 17, 2024	Back to work opportunities for school bus drivers to drive students to and from school in vans, medium to large buses.	Looking to hire drivers/monitors for all of our Birnie Bus locations for upcoming school year.	Television Inquiries

B6. Language Assistance Plan

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, Birnie Transit, Inc/Birnie Bus Service, Inc will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons.

In order to ensure meaningful access to Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc transit service.
2. The frequency with which LEP persons come into contact with Birnie Transit, Inc/Birnie Bus Service, Inc .
3. The nature and importance of Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc has conducted a Four Factor Analysis¹ of the following areas: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

Birnie Bus Service, Four County Line Run

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Birnie Bus Service/and Birnie Transit, Inc. services

Birnie Bus Service/and Birnie Transit, Inc. staff reviewed the American Community Survey 5-Year Estimates for New York State and determined that:

- a. 77,773 individuals in the Birnie Bus Service, Four County Line Run service area which covers all of Oneida, Herkimer, Madison and Onondaga Counties speak a language other than English [comprising 9.85 % of the population];
- b. Of those, 28,953 individuals have limited English proficiency; that is, they speak English less than “very well” or “not at all.” This is only 3.67 % of the overall population in the service area;
- c. In the Birnie Bus Tours, Four County Line Run service area, of those persons with limited English proficiency:
 - 0.84 % speak Spanish
 - 1.37 % speak Other Indo-European languages
 - 1.19 % speak Asian and Pacific Islander languages

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

- 0.27 % speak all other languages

2. The frequency with which LEP persons come in contact with Birnie Bus Service/and Birnie Transit, Inc.

Birnie Bus Service/and Birnie Transit, Inc. reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

- a. Birnie Bus Service/and Birnie Transit, Inc. other staff have had very little contact with LEP persons.

3. The nature and importance of services provided by Birnie Bus Service/and Birnie Transit, Inc. to the LEP population

There is no large geographic concentration of any type of LEP individuals in the service area for Birnie Bus Service and Birnie Transit Inc. The overwhelming majority of the population, 90.15 %, speaks only English. The Birnie Bus Service/and Birnie Transit Inc. staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.

4. The resources available to Birnie Bus Service and Birnie Transit, Inc. and overall cost to provide LEP assistance

Birnie Bus Service and Birnie Transit, Inc. reviewed its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are suitable for translation if the need arises. The following Birnie Bus Service/and Birnie Transit, Inc. provided documents are vital for translation (See Appendix F and G):

- All printed schedules
- Title VI and ADA Plan Policies, which includes the companies' complaint procedures and forms
- All public postings including written notices of rights and notices of denials, losses or decreases in benefits or services.

Language translation options can be provided by bilingual staff or on the Birnie Bus website.

Lewis County Rural Transit System

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Birnie Bus Service/and Birnie Transit, Inc.

Birnie Bus Service/and Birnie Transit, Inc. staff reviewed the American Community Survey 5-Year Estimates for New York State and determined that:

- a. 687 individuals in the Lewis County Rural Transit System service area [comprising 2.70 % of the population] speak a language other than English;
- b. Of those, 267 individuals have limited English proficiency; that is, they speak English

less than “very well” or “not at all.” This is only 1.10 % of the overall population in the service area;

c. In the Lewis County Rural Transit System service area, of those persons with limited English proficiency:

- 0.40 % speak Spanish
- 0.60 % speak Other Indo-European languages
- 0.10 % speak Asian and Pacific Islander languages

2. The frequency with which LEP persons come in contact with Birnie Bus Service/and Birnie Transit, Inc.

Birnie Bus Service/and Birnie Transit, Inc. reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

- a. Birnie Bus Service/and Birnie Transit, Inc. other staff have had very little contact with LEP persons.

3. The nature and importance of services provided by Birnie Bus Service/and Birnie Transit, Inc. to the LEP population

There is no large geographic concentration of any type of LEP individuals in the service area for the Lewis County Rural Transit System. The overwhelming majority of the population, 97.30 %, speaks only English. The Birnie Bus Service/and Birnie Transit, Inc. staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.

4. The resources available to Birnie Bus Service/and Birnie Transit, Inc. and overall cost to provide LEP assistance

Birnie Bus Service/and Birnie Transit, Inc. reviewed its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are suitable for translation if the need arises. The following Birnie Bus Service/and Birnie Transit, Inc. provided documents are vital for translation (See Appendix F and G):

- Title VI and ADA Plan Policies, which includes the companies’ complaint procedures and forms
- All public postings including written notices of rights and notices of denials, losses or decreases in benefits or services.

Language translation options can be provided by bilingual staff or on the Birnie Bus website.

Madison County Rural Transit System, Madison Transit System

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Birnie Bus Service/and Birnie Transit, Inc.

Birnie Bus Service/and Birnie Transit, Inc. staff reviewed the American Community Survey 5-Year Estimates for New York State and determined that:

- a. 2,753 individuals in the Madison County Rural Transit System service area [comprising 4.00 % of the population] speak a language other than English;
- b. Of those, 500 individuals have limited English proficiency; that is, they speak English less than “very well” or “not at all.” This is only .70 % of the overall population in the service area;
- c. In the Madison County Rural Transit System service area, of those persons with limited English proficiency:
 - 0.10 % speak Spanish
 - 0.30 % speak Other Indo-European languages
 - 0.20 % speak Asian and Pacific Islander languages
 - 0.10 % speak all other languages

2. The frequency with which LEP persons come in contact with Birnie Bus Service/and Birnie Transit Inc.

Birnie Bus Service/and Birnie Transit, Inc. reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

- a. Birnie Bus Service/and Birnie Transit, Inc. other staff have had very little contact with LEP persons.

3. The nature and importance of services provided by the Birnie Bus Service/and Birnie Transit, Inc. to the LEP population

There is no large geographic concentration of any type of LEP individuals in the service area for Madison County Rural Transit System. The overwhelming majority of the population, 96.00 %, speaks only English. The Birnie Bus Service and Birnie Transit, Inc. staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.

4. The resources available to Birnie Bus Service and Birnie Transit, Inc. and overall cost to provide LEP assistance

Birnie Bus Service and Birnie Transit, Inc. reviewed its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are suitable for translation if the need arises. The following Birnie Bus Service and Birnie Transit, Inc. provided documents are vital for translation (See Appendix F and G):

- All printed schedules
- Title VI and ADA Plan Policies, which includes the companies’ complaint procedures and forms
- All public postings including written notices of rights and notices of denials, losses or decreases in benefits or services.

Language translation options can be provided by bilingual staff or on the Birnie Bus website.

Otsego County Transit System,

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Birnie Bus Service and Birnie Transit, Inc.

Birnie Bus Service and Birnie Transit, Inc. staff reviewed the American Community Survey 5-Year Estimates for New York State and determined that:

- a. 3,526 individuals in the Otsego County System service area [comprising 6.00 % of the population] speak a language other than English;
- b. Of those, 762 individuals have limited English proficiency; that is, they speak English less than “very well” or “not at all.” This is only 1.40 % of the overall population in the service area;
- c. In the Otsego County System service area, of those persons with limited English proficiency:
 - 0.30 % speak Spanish
 - 0.60 % speak Other Indo-European languages
 - 0.40 % speak Asian and Pacific Islander languages
 - 0.10 % speak all other languages

2. The frequency with which LEP persons come in contact with Birnie Bus Service/and Birnie Transit, Inc.

Birnie Bus Service/and Birnie Transit, Inc. reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

- b. Birnie Bus Service and Birnie Transit, Inc. other staff have had very little contact with LEP persons.

3. The nature and importance of services provided by the Birnie Bus Service/and Birnie Transit, Inc. to the LEP population

There is no large geographic concentration of any type of LEP individuals in the service area for Otsego County System. The overwhelming majority of the population, 94.00 %, speaks only English. The Birnie Bus Service/and Birnie Transit, Inc. staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.

4. The resources available to Birnie Bus Service/and Birnie Transit, Inc. and overall cost to provide LEP assistance

Birnie Bus Service/and Birnie Transit, Inc. reviewed its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are

suitable for translation if the need arises. The following Birnie Bus Service/and Birnie Transit, Inc. provided documents are vital for translation (See Appendix F and G):

- Title VI and ADA Plan Policies, which includes the companies' complaint procedures and forms
- All public postings including written notices of rights and notices of denials, losses or decreases in benefits or services.

Language translation options can be provided by bilingual staff or on the Birnie Bus website.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be eligible to language assistance with respect to the services offered by Birnie Bus Service and Birnie Transit, Inc. Language assistance can include interpretation (that means oral or spoken transfer of a message from one language into another language) and translation (that means the written transfer of a message from one language into another language).

How Birnie Bus Service/and Birnie Transit, Inc. staff identifies an LEP person in need of language assistance:

- Post notices of the LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Periodically surveying Birnie Bus Service/and Birnie Transit, Inc. staff regarding their interaction with LEP persons during the previous period (e.g., quarterly, semi-annually, and annually).
- Greeting participants at Birnie Bus Service/and Birnie Transit, Inc. attended informational meetings or events. Conversational interaction with participants helps determine LEP needs for future events.

Language Assistance Measures

Although there is a low percentage of LEP individuals in the Birnie Bus Service/and Birnie Transit, Inc. (i.e., persons who speak English less than “very well” or “not at all”), the Birnie Bus Service/and Birnie Transit will take the following actions:

1. The Birnie Bus Service/and Birnie Transit, Inc. staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Volunteer Spanish language interpreters will be provided within a reasonable time period.
 - The language translation function of the company website will be preserved.
 - Language interpretation services for all other languages will be accessed through a professional interpretation service when necessary

TRANSLATION OF DOCUMENTS

Birnie Bus Service/Birnie Transit, Inc. weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating documents, the likelihood of frequent changes in documents and other relevant factors, Birnie Bus Service/Birnie Transit, Inc. has determined that it is an unreasonable burden to translate documents at this time.

Due to the small LEP population, Birnie Bus Service and Birnie Transit, Inc. does not have an extensive formal outreach procedure in place as of 2024. However, if the need arises to conduct more specific outreach to LEP individuals, Birnie Bus Service and Birnie Transit, Inc. will consider the following options:

- When staff prepares documents or schedules public meetings whose audience is expected to include LEP individuals, Birnie Bus Service and, Birnie Transit, Inc. will provide meeting notices, flyers, and agendas in the appropriate non-English language(s).
- Birnie Bus Service and Birnie Transit, Inc. will assess requests for the translation of documents based on the potential effect and known LEP population.

MONITORING

Monitoring and Updating the LEP Plan – Birnie Bus Service and Birnie Transit, Inc. will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every three years when the Title VI Plan is reviewed and updated, when recent data from the U.S. Census and the American Community Survey is available, or when it is clear that higher concentrations of LEP individuals are present in the Birnie Bus Service and Birnie Transit, Inc. service area. Updates to the LEP Plan will include the following:

- The number of documented LEP contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area (census data, surveys, information from community-based organizations, and other sources).
- Determination as to whether the need for translation services has changed.
- Determination of the effectiveness of language assistance efforts.
- Determination of the adequacy of the Birnie Bus Service and Birnie Transit, Inc. financial resources to fund language assistance resources.
- Determination of Birnie Bus Service and Birnie Transit, Inc. full compliance with the goals of the LEP Plan.
- Determination of Birnie Bus Service and Birnie Transit, Inc. processing of LEP complaints.

Training Employees to Provide Language Assistance

Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc '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

Birnie Transit, Inc/Birnie Bus Service, Inc , being a private bus company performing third party operations under contract with the state and other local governments, has not organized, nor does it chair or manage, any non-elected committees or councils. Birnie Bus is, however, involved through membership in the following committees:

- **Transportation Coordination Committee (TCC) for Oneida and Herkimer Counties:** Birnie bus is an active member of this committee which provides a coordination forum for all transportation related agencies, businesses and services provided in the area covered by the Oneida and Herkimer Counties' MPO region. This committee makes up a membership of roughly 1% African-American, and 99% Caucasian. Head personnel actively pursues inclusion of minorities into its work through general advertisements, and seeking professional input from representatives of local organizations that service the minority populations in the area.
- **Transportation Planning Committee for Oneida and Herkimer Counties:** Birnie bus is an active member of this committee which provides an administration forum for key transportation related agencies, businesses and services directly tied to the regular public services provided to the residents of Oneida and Herkimer Counties through its local MPO, Herkimer-Oneida Counties Transportation Study. This committee makes up a membership of roughly 1% African -American, and 90% Caucasian. Head personnel actively pursues inclusion of minorities into its work through general advertisements, and seeking professional input from representatives from local organizations that service the minority populations in the area.

B8. Recordkeeping and Reporting

Birnie Transit, Inc/Birnie Bus Service, Inc 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.

Birnie Transit, Inc/Birnie Bus Service, Inc 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. The Birnie Transit, Inc/Birnie Bus Service, Inc will review its Title VI Plan at least once every three years to determine if modifications are necessary. The Birnie Transit, Inc/Birnie Bus Service, Inc directly operates services the operation of 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

Date	Activity (Review-Update- Addendum- Adoption- Distribution)	Person Responsible	Remarks
February, 2021	Adopted and distributed	Rocky Corigliano	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
August 15, 2024	Annual review of implementation	Rocky Corigliano	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
April 24, 2025	Annual review of implementation	Rocky Corigliano	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
August, 2025	Updated plan, adopted and distributed	James Caruso	Verified all employees received training and copies of Title VI policy. Verified intake materials, postings

Program Monitoring

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

Title VI Equity Analysis

Birnie Bus Service/and Birnie Transit, Inc. has not constructed a facility using transit funds which would require the completion of a Title VI Equity Analysis since the last update of this plan.

Did Birnie Transit, Inc/Birnie Bus Service, Inc construct, expand or acquired a facility in the past three years?

☒ **No.** Birnie Transit, Inc/Birnie Bus Service, Inc has not constructed, expanded or acquired a facility.

Does Birnie Transit, Inc/Birnie Bus Service, Inc plan to construct, expand or acquire a facility in the next three years? (*check the box next to the appropriate response below*)

☒ **No.** Birnie Transit, Inc/Birnie Bus Service, Inc does not plan to construct, expand or acquire a facility.

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 vehicle's achievable capacities, which are 55 passengers for a 50-foot commuter coach bus or 35 passengers for a 36.5-foot commuter mini coach bus.

Vehicle Headway Standard

This system operates weekly from early morning to late evenings Monday through Saturday. Due to the extended distance between destinations, each route runs once a day, serving many stops multiple times. Each stop is serviced at least twice a day. Stops with higher ridership populations are serviced more frequently, generally once every hour.

Many factors are taken into consideration when scheduling potential bus stop locations. These include: density of transit-dependent population and activities, large employment centers, land use connectivity, transit/pedestrian friendly streets, and relationship with major transportation developments.

On Time Performance Standard

A vehicle is considered on time if it departs a scheduled stop at the time advertised in the printed schedule. Riders are strongly encouraged to arrive at a stop ten to fifteen minutes before the advertised time. Vehicles on-time performance is sporadically monitored by GPS and more thoroughly if a customer complaint arises.

Service Availability Standard

Birnie Bus Tours, Inc. distributes transit service so that all major population points are serviced and stops are located within ¼ of a mile of local bus service or central commercial areas.

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. Birnie Transit, Inc/Birnie Bus Service, Inc service policies are:

Transit Amenities Policy

Distribution of our system schedules are installed throughout the community in prominent public areas. The schedule can also be found on our website, which has the ability to choose a language that will allow viewers to read in another language most of the fixed content. The public is also free to call for additional information on our scheduling.

Vehicle Assignment Policy

All vehicles are either 36.5 foot commuter mini-coach buses or 50 foot commuter coach buses capable of providing adequate service for all routes and are assigned to the main Birnie Bus Terminal in Utica, NY. As per our contract, these are managed so that vehicles do not exceed a useful life of seven years or 500,000 miles, whichever comes first. All buses are air conditioned and equipped with a wheelchair lift to provide accessibility.

Title VI Service and Equity Analysis

Birnie Bus Service and Birnie Transit, Inc. do not meet the criteria to require a Title VI Service and Equity Analysis to be performed. Birnie Bus does not operate more than 50 fixed route vehicles in peak service located within an Urbanized Area (UZA) of 200,000 or more people. All of the third party operation services Birnie Bus provides have a range of four to eleven vehicles at peak and cater to mostly rural populations.

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

Birnie Transit, Inc/Birnie Bus Service, Inc Title VI Plan Board Approval

On behalf of the Birnie Management team, we the Board have reviewed and adopted the Birnie Transit, Inc/Birnie Bus Service, Inc 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 Birnie Transit, Inc/Birnie Bus Service, Inc 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: Feb 2021

Adopted: Feb 2021

Adopted By: Birnie Management Team

Revised: July 10, 2025

Adopted By: Birnie Management Team

APPENDIX B: Title VI Complaint Form

Birnie Transit, Inc/Birnie Bus Service, Inc 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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> 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	
<p>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</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>Provide information for the contact person at the agency/court where the complaint was filed.</p>	
<p>Name and Title:</p>	
<p>_____</p>	
<p>Agency:</p>	
<p>Address:</p>	
<p>Telephone:</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.

Birnie Transit, Inc/Birnie Bus Service, Inc
Title VI/ADA Coordinator
Safety Manager
1300A Floyd Ave, Suite B
Rome, NY 13440
James.Caruso@birniebus.com

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 Birnie Transit, Inc/Birnie Bus Service, Inc 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) 231-5602 or in writing to Birnie Transit, Inc/Birnie Bus Service, Inc , 1300A Floyd Ave, Suite B, Rome, NY 13440, or James.Caruso@Birniebus.com.

Sincerely,

Birnie Transit/Birnie Bus Service, Inc
Safety Investigator
Title VI Coordinator
1300A Floyd Ave, Suite B
Rome, NY 13440
315-231-5602

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 Birnie Transit, Inc/Birnie Bus Service, Inc 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.

Birnie Transit, Inc/Birnie Bus Service, Inc 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,

Birnie Transit/Birnie Bus Service, Inc
Safety Investigator
Title VI Coordinator
1300A Floyd Ave, Suite B
Rome, NY 13440
315-231-5602

APPENDIX E: Title VI Complaint Letter of Finding

Date

Name

Address

City, State Zip

Dear Name:

The matter referenced in your letter dated _____ against Birnie Transit, Inc/Birnie Bus Service, Inc alleging Title VI violation has been investigated. The investigation determined non-compliance by Birnie Transit, Inc/Birnie Bus Service, Inc 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,

Birnie Transit/Birnie Bus Service, Inc
Safety Investigator
Title VI Coordinator
1300A Floyd Ave, Suite B
Rome, NY 13440
315-231-5602

APPENDIX F: Title VI Notice to the Public

Notifying the Public of Rights under Title VI and the ADA

Birnie Transit, Inc/Birnie Bus Service, Inc

The **Birnie Transit, Inc/Birnie Bus Service, Inc** 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 **Birnie Transit, Inc/Birnie Bus Service, Inc**.

For more information on the **Birnie Transit, Inc/Birnie Bus Service, Inc**'s program, and the obligations and procedures to file a complaint, contact (315)-231-5602; email James.Caruso@Birniebus.com; or visit our office at **Birnie Transit, Inc/Birnie Bus Service, Inc**, 1300A Floyd Ave, Suite B, Rome, NY 13440. For more information on how to contact **Birnie Transit, Inc/Birnie Bus Service, Inc** to find out about Title VI, visit www.Birniebus.com.

A complainant may file a complaint directly with **Birnie Transit, Inc/Birnie Bus Service, Inc** TITLE VI Coordinator by following the **Birnie Transit, Inc/Birnie Bus Service, Inc** 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)-231-5602.

Si necesita información en otra idioma, por favor contacto (315)-231-5602.

Appendix G

Employee Annual Education Form

Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of Birnie Bus Service/and Birnie Transit, Inc. are expected to consider, respect, and observe this policy in their daily work and duties. Citizen questions or complaints shall be directed to the Safety Manager or his/her designee.

In all dealings with citizens, please use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to respectfully address citizens without regard to race, color or national origin.

Appendix H

Acknowledgement of Receipt of Title VI Program

I hereby acknowledge the receipt of Birnie Bus Title VI Plan. I agree to familiarize myself with the contents of this manual and will abide by the same ensuring that no person is excluded from participation in, or denied the benefits or services delivered by Birnie Bus. on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

Employee signature

Print your name

Date