COTHOA Luncheon Club Inc.

TITLE VI Plan

Date Adopted: September 17,2025

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

COTHOA Luncheon Club Inc. is a nonprofit who receives FTA Section 5310 funding through NYSDOT to provide closed-door transit services to only individuals who are 60 years of age or older as well as disabled individuals. COTHOA Luncheon Club Inc. operates from 8 am to 5 pm Monday – Friday. COTHOA Luncheon Club Inc. is located at 2005 Amsterdam Ave, New York, NY 10032. COTHOA Luncheon Club Inc. has been serving Older Adults since 1974, fare free.

B. COTHOA Luncheon Club Inc. Title VI Plan

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 and/or 5311 funds, COTHOA Luncheon Club 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.)

The COTHOA Luncheon Club Inc. shall update its Title VI plan every three years and present the updated plan to NYSDOT for their review and approval.

B1. COTHOA Luncheon Club Inc. TITLE VI Policy

The COTHOA Luncheon Club 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 5310 agreement between COTHOA Luncheon Club Inc. and NYSDOT and third-party contractors.

For more information on COTHOA Luncheon Club Inc.'s Title VI program contact:

Jane Ruddy

COTHOA Luncheon Club Inc.

Executive Director

2005 Amsterdam Ave

Phone (212)781-6580

Email address: cothoalunc@aol.com

B2. Title VI Public Notice

The COTHOA Luncheon Club Inc.'s Notice to the Public is posted in the following locations:

☒ Agency website at: www.COTHOA.com

☒ Public areas of the agency office COTHOA Luncheon Club Inc. 2005 Amsterdam Ave, New York, NY 10032 (Public areas mean common area, public meeting rooms, etc.)

☒ Inside transit vehicles

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

The COTHOA Luncheon Club 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. COTHOA Luncheon Club Inc. also operates it 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 COTHOA Luncheon Club Inc..

For information on COTHOA Luncheon Club Inc.'s Title VI policy or to obtain the Title VI complaint form and procedures visit our website at www.cothoa.com. Or contact:

Title VI Coordinator
COTHOA Luncheon Club Inc.
2005 Amsterdam Ave,
New York, NY

Phone (212)781-6580
Email:cothoalunc@aol.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 (212)-781-6580.

B3. Title VI Complaint Procedures and Complaint Form

The COTHOA Luncheon Club Inc.'s Title VI Complaint Procedure is available in the following locations:

- ☒ Agency website at: www.cothoa.com
- ☒ 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 B*) to the address below.

COTHOA Luncheon Club Inc.
Jane Ruddy
2005 Amsterdam Ave
New York, NY 10032
Phone (212)781-6580
Email address cothoalunc@aol.com

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

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

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if the COTHOA Luncheon Club 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 COTHOA Luncheon Club 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 COTHOA Luncheon Club 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 members, 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 letter of the closure or the LOF.

Filing complaints with COTHOA Luncheon Club 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 COTHOA Luncheon Club Inc. at (212)781-6580

Si se necesita informacion en otro idioma por favor contacto, (212)781-6580

B4. Transit Related Title VI Complaints, Investigations and Lawsuits

The COTHOA Luncheon Club 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 name. A case number is preferrable.)

Reporting Period: **01/01/24-12/31/24**

01/01/25-12/31/25

01/01/26-01/31/26

Check One:

X There have been no investigations, complaints and/or lawsuits filed against COTHOA Luncheon Club Inc. during the reporting period.

____ There have been investigations, complaints and/or lawsuits filed against COTHOA Luncheon Club 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

This section describes how COTHOA Luncheon Club Inc. will assist the primary Funder, NYC Aging to develop and implement their Public Participation Plan. COTHOA Luncheon Club Inc., will assist with the dissemination of vital Funder information and engage the public in the Funder's decision-making process. We will seek out and consider the input and needs of interested parties and groups traditionally underserved by transportation systems. These groups may face challenges accessing our services, such as minority and limited English proficient (LEP) persons. Underlying these efforts is our commitment to determining the most effective public involvement methods for a given project or population. This section describes the proactive strategies, procedures, and desired outcomes that underpin our organization's public participation activities.

COTHOA Luncheon Club Inc. primarily serves only clients that have been determined to be eligible for our transit service by the NYC Aging (Funder). The Funder, as a recipient of federal financial assistance, must comply with all Title VI requirements in the development and delivery of their programs. COTHOA Luncheon Club Inc. serves all individuals who are determined by the Funder to be eligible for services, without regard to race, color, or national origin and low-income status.

Public Outreach Activities

COTHOA Luncheon Club Inc.'s program decision-making public involvement is limited to the population that meets the eligibility criteria set by the **NYC Aging** (Funder). The Funder is the lead agency for public involvement in the decision-making process with the goal of offering minority and low-income individuals the opportunity to comment on the benefits of the program services being provided with federal financial assistance. The Funder outreach consists of relationship building with agencies and stakeholders (such as ARC Fort Washinghton OAC,) that provide services to minority, low income and LEP communities

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

Summary on Public Involvement Activity

Since the last Title VI plan update and in the next three years COTHOA Luncheon Club Inc. will continue to assist the Funder with public involvement outreach in order to recruit applicants and keep existing clients informed through emails, website posting, in-person discussions about the Funder and attend virtual sessions as invited.

B6 Language Assistance Plan

Language Assistance Plan Components

Limited English Proficient (LEP) persons are people for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. To comply with the FTA Title VI requirement on nondiscrimination based on national origin, as it affects limited English proficient persons, COTHOA Luncheon Club Inc. will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons. The COTHOA Luncheon Club Inc.'s Language Assistance Plan considers the following factors:

A number or proportion of the LEP population(s) specifically served or that could be served by COTHOA Luncheon Club Inc. transit service.

1. The number or proportion of the LEP population(s) specifically served or that could be served.
2. The frequency with which LEP persons come into contact with COTHOA Luncheon Club Inc..
3. The nature and importance of COTHOA Luncheon Club Inc. transit services to LEP population(s).
4. The resources available to LEP outreach and how employees are trained to provide language assistance to LEP persons.

LEP Four Factor Analysis

To determine what specific languages are spoken in our transit service area and to determine what language services are appropriate for the LEP population, the COTHOA Luncheon Club Inc. has conducted a Four Factor Analysis[1]: (1) Demography, (2) Frequency, (3) Importance, and (4) Resources and costs.

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

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

COTHOA Luncheon Club Inc. assessed the oral and written language needs of the individuals who specifically receive our transit services, COTHOA Luncheon Club Inc. has staff available to provide oral interpretation. Our agency emphasizes communication with all clients Communication is important to provide client dignity and for effective treatment plans or activities. Since the last Title VI plan update, COTHOA Luncheon Club Inc. has not had to provide a language translation or interpretation service to our clients.

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

Factor 2–Frequency | Frequency with which LEP people come in contact with COTHOA Luncheon Club Inc.

The COTHOA Luncheon Club Inc.'s day-to-day clients are assessed for their ability to understand English during the Funder's intake process, we have staff available to provide oral interpretation. Title VI plan update, COTHOA Luncheon Club Inc. has not had to provide our clients with assistance in another language.

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

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

Factor 4 Resources and Costs | Resources available and employee training

During new employee orientation, COTHOA Luncheon Club Inc. provides the principles on Title VI and language assistance with an emphasis that the client are protected under Title VI and LEP. Our employees obtain language assistance training to continue to meet the needs of our clientele and the LEP individual. COTHOA Luncheon Club Inc. has adequate resources to provide employee training. Oral interpretation for the clients is provided at no cost.

Providing Language Assistance Services

As a result of the four-factor analysis, a Language Assistance Plan is not required at this time. However, reasonable attempts will be made to accommodate any persons encountered who require written translation or oral interpretation services. The services will include an interpreter, including Google translate on our website, accessing community organizations that meet the needs of multi-lingual speaking population. As needed, key documents will be translated through the website by using Google translate. If additional language assistance is required, the client will be referred to the Funder for assistance and materials in another language. The Language Assistance Plan will be monitored annually for any language assistance change. If no change occurs, the Language Assistance Program will at a minimum be updated during the Title VI plan update.

Informing LEP Populations of the Availability of Language Assistance

Language assistance is advertised on our website, on the Title VI notice, through posters in our agency, and through program registration materials, as applicable. COTHOA Luncheon Club Inc. also utilizes community-based organizations to share the availability of these services, public meetings, and outreach documents.

COTHOA Luncheon Club Inc. annually identifies the language capabilities and language assistance needs of our closed door ridership. Oral interpretation for the clients is provided at no cost.

Updating the Language Assistance Plan

The COTHOA Luncheon Club Inc. will monitor the effectiveness of the language assistance to determine if enhancements on the methods (translating vital documents, interpretations and website) is required to better communicate with the LEP population. As a part of this process, the COTHOA Luncheon Club Inc. will incorporate components that encourage feedback from customers on their experience with the implementation of the Language Assistance Plan. Based on the input received, COTHOA Luncheon Club Inc. will make any immediate critical updates that can be feasibly implemented and document others for the triennial update of the Title VI Plan.

Training Employees to Provide Language Assistance

COTHOA Luncheon Club 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:

Title VI Notice to the Public

Title VI complaint procedures and form

Complaint log

LEP (Four Factor Analysis and Language Assistance Plan)

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

B7. Minority Representation on Advisory Boards

COTHOA Luncheon Club Inc. has no transit-related, non-elected committees or advisory councils.

B8. Recordkeeping and Reporting

COTHOA Luncheon Club 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.

COTHOA Luncheon Club 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 COTHOA Luncheon Club Inc. will review its Title VI Plan at least once every three years to determine if modifications are necessary. The COTHOA Luncheon Club Inc. directly operates closed-door 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**
September 2022	Adopted and distributed	Name Jane Ruddy	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
September, 2023	Annual review of implementation	Name Jane Ruddy	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
September, 2024	Annual review of implementation	Name Jane Ruddy	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
September 2025	Updated plan, adopted and distributed	Name Jane Ruddy	Verified all employees received training and copies of Title VI policy. Verified intake materials, postings.

Program Monitoring

The COTHOA Luncheon Club Inc. will monitor the effectiveness of the Title VI program through the feedback from clientele, employees, general public and other agencies (NYC Aging, NYSDOT, FTA). COTHOA Luncheon Club 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, COTHOA Luncheon Club 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 COTHOA Luncheon Club 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 siting alternatives.
3. An analysis about whether a disparate impact occurs on the basis of race, color or national origin (including potential cumulative adverse impacts from other facilities with similar impacts in the area) because of the location and construction of a facility. (If there

is a disparate impact, the construction of the facility may only occur if there is a substantial legitimate justification, there are no alternative locations that would have a less disparate impact, and it is not a pretext for discrimination).

For any new facility construction, expansion, or acquisition, COTHOA Luncheon Club 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 directions to the reader as to whether COTHOA Luncheon Club Inc. was required to, completed, and included a Title VI equity analysis with this Title VI Plan update.

Did COTHOA Luncheon Club Inc. construct, expand or acquire a facility in the past three years?

☒ **No**. COTHOA Luncheon Club Inc. has not constructed, expanded or acquired a facility.

☐ **Yes**. COTHOA Luncheon Club Inc. did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

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

☒ **No**. COTHOA Luncheon Club Inc. does not plan to construct, expand or acquire a facility.

☐ **Yes**. COTHOA Luncheon Club Inc. plans to (construct, expand or acquire) a facility.

If yes, was a Title VI equity analysis completed?

☐ **Yes**. A Title VI equity analysis was completed. A copy of the analysis is included as ***Appendix X***.

☐ **No**. A Title VI equity analysis was not completed.

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

The COTHOA Luncheon Club Inc. will distribute transit service so that 20 percent of all residents in the service area are within a 1 mile walk of the service.

And the following service policies information:

C. FIXED ROUTE TRANSIT

COTHOA Luncheon Club Inc. does not provide fixed route services.

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

COTHOA Luncheon Club Inc. Title VI Plan Board Approval

On behalf of the Church On The Hill AME ZION, we the Board have reviewed and adopted the COTHOA Luncheon Club 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 COTHOA Luncheon Club 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: *11/20/2025*

Adopted: *11/20/2025*

Adopted By: *Church On The Hill AME Zion* DeForest Raphael

Revised:

Adopted By:

APPENDIX B: Title VI Complaint Form

COTHOA Luncheon Club 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**
If you answered "yes" to this question, go to Section III.		
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** ***If yes, check all that apply:*** ☐ **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.

COTHOA Luncheon Club Inc.
Jane Ruddy, Title VI/ADA Coordinator
2005 Amsterdam Ave
New York, NY 10032
Email address cothoalunc@aol.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,

Dear Name:

This letter is to acknowledge receipt of your Title VI complaint against COTHOA Luncheon Club 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 (212)781-6580 or in writing to COTHOA Luncheon Club Inc.,cothoalunc@aol.com

Sincerely,

Name Jane Ruddy

Title VI Coordinator

2005 Amsterdam Ave, New York, Ny 10032 & Phone (212)781-6580

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 COTHOA Luncheon Club 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.

COTHOA Luncheon Club 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,

Jane Ruddy

Title VI Coordinator

2005 Amsterdam Ave, New York, NY 10032

(212)781-6580

APPENDIX E: Title VI Complaint Letter of Finding

Date

Name

Address

City, State Zip

Dear Name:

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

Jane Ruddy,

Title VI Coordinator

2005 Amsterdam Ave, New York, NY 10032

(212)781-6580

APPENDIX F: Title VI Notice to the Public

Notifying the Public of Rights under Title VI

COTHOA Luncheon Club Inc.

The COTHOA Luncheon Club 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. COTHOA Luncheon Club Inc. also operates it 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 COTHOA Luncheon Club Inc..

For information on COTHOA Luncheon Club Inc.'s Title VI policy or to obtain the Title VI complaint form and procedures visit our website at www.cothoa.com. Or contact:

Title VI Coordinator

COTHOA Luncheon Club Inc.

2005 Amsterdam Ave,

New York, NY

Phone (212)781-6580

Email:cothoalunc@aol.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 (212)-781-6580.

Notifying the Public of Rights under Title VI

COTHOA Luncheon Club Inc.

The **COTHOA Luncheon Club 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 **COTHOA Luncheon Club Inc.**.

For more information on the **COTHOA Luncheon Club Inc.**'s program, and the obligations and procedures to file a complaint, contact (212)781-6580; email cothoalunc@aol.com; or visit our office at **COTHOA Luncheon Club Inc.**, 2005 Amsterdam Ave, New York, NY 10032

For more information on how to contact **COTHOA Luncheon Club Inc.** to find out about Title VI, visit www.cothoa.com.

A complainant may file a complaint directly with **COTHOA Luncheon Club Inc.** TITLE VI Coordinator by following the **COTHOA Luncheon Club 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 (212)781-6580

Si necesita información en otra idioma, por favor contacto (212)781-6580.