November 2, 2020

Finance Committee: 10-26-2020

RESOLUTION NO. 309-2020

ADOPTING AN AMENDED ST. LAWRENCE COUNTY TITLE VI PLAN AND AUTHORIZING THE CHAIR TO SIGN THE PLAN

By Mr. Acres, Chair, Finance Committee

WHEREAS, Resolution No. 254-2016, authorized the Board of Legislators to adopt a Title VI Plan, and

WHEREAS, in accordance with Title VI of the Civil Rights Act of 1964, the St. Lawrence County Title VI Program Plan was drafted to reaffirm the policy of the County to allow all individuals the opportunity to participate in federal financially assisted services, and

WHEREAS, as a recipient of federal and state funds, St. Lawrence County is subject to the requirements and provisions of Title VI of the Civil Rights Act of 1964, as amended, and

WHEREAS, the provisions include, but are not limited to, prohibiting discrimination on the grounds of race, color or national origin (being denied the benefits of, or otherwise subjected to discrimination under any program or activity administered by federal or state assisted programs, services, or activities), and

WHEREAS, St. Lawrence County is currently working with the New York State Department of Transportation Office of Civil Rights to ensure compliance with Federal Highway Administration requirements related to Title VI and non-compliance can affect federal financial assistance, and

WHEREAS, St. Lawrence County assures every effort will be made to guarantee nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not, and every effort will be made to ensure that no person is excluded from participation in or denied benefits of its services based on race, color, or national origin,

NOW, THEREFORE, BE IT RESOVLVED that the Board of Legislators adopts the amended Title VI Plan and authorizes the Chair to sign the Plan, upon approval of the County Attorney, and

BE IT FURTHER RESOLVED that the Board of Legislators appoints the Director of Planning as the Title VI Coordinator, and

BE IT FURTHER RESOLVED that the Plan will be housed within the St. Lawrence County Planning Department and available for review.

November 2, 2020

STATE OF NEW YORK)
) **ss:**
COUNTY OF ST. LAWRENCE)

I, Kelly S. Pearson, Deputy Clerk of the St. Lawrence County Board of Legislators, **DO HEREBY CERTIFY** that I have compared this Resolution No. 309-2020 Entitled "Adopting an Amended St. Lawrence County Title VI Plan and Authorizing the Chair to Sign the Plan", adopted November 2, 2020, with the original record in this office and that the same is a correct transcript thereof and of the whole of said original record.

Kelly S. Pearson
Kelly S. Pearson, Deputy Clerk
St. Lawrence County Board of Legislators
November 3, 2020

TITLE VI PLAN
for Receipt of Federal Highway Administration Funds

St. Lawrence County

David Forsythe, Chair

11/9/26

Date

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Introduction

St. Lawrence County is a recipient of Federal funds from the United States Department of Transportation modal agencies which includes the Federal Highway Administration (FHWA). All recipients of federal funding must comply with the requirements of Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, regulations and authorities. The Title VI Plan (Plan) describes how St. Lawrence County effectuates nondiscrimination in the delivery of its federally assisted programs, services and activities. The Plan includes the staffing structure for St. Lawrence County's Title VI Nondiscrimination program as well as the policies, procedures and practices St. Lawrence County has in place to comply with Federal nondiscrimination requirements. The Plan is regularly monitored and updated to reflect the growth and changes of St. Lawrence County's Title VI Nondiscrimination program as it changes and grows. Anyone wishing to provide input into St. Lawrence County's Title VI program or activities is encouraged to contact St. Lawrence County's Title VI Coordinator by calling (315) 379-2292, emailing planning@stlawco.gov, or by writing to 48 Court Street, Canton, NY 13617.

Title VI prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on the basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them. This prohibition applies to intentional discrimination as well as to procedures, criteria or methods of administration that appear neutral but have a discriminatory effect on individuals because of their race, color, or national origin. Policies and practices that have such an effect must be eliminated unless a recipient can show that they were necessary to achieve a legitimate nondiscriminatory objective. Even if there is such a reason the practice cannot continue if there are alternatives that would achieve the same objectives but that would exclude fewer minorities. Persons with limited English proficiency must be afforded a meaningful opportunity to participate in programs that receive Federal funds. Policies and practices may not deny or have the effect of denying persons with limited English proficiency equal access to federally funded programs for which such persons qualify.

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of federal aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include:

Title VI of the Civil Rights Act of 1964; 42 USC 2000d to 2000d-4; 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3; EO 13166.

Title VI Nondiscrimination Policy Statement

St. Lawrence County assures that no person shall on the grounds of race, color, national origin, or sex as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. St. Lawrence County further assures every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs and activities are federally funded or not.

If St. Lawrence County distributes federal aid funds to another governmental entity, St. Lawrence County will include Title VI language in all written agreements and will monitor for compliance. St. Lawrence County's Title VI Program Specialist is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 23 CFR 200 and 49 CFR 21.

Policy and Scope

St. Lawrence County's Civil Rights Policy Statement directs that the requirements of Articles 15-A of New York State Executive Law, Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, as well as the Americans with Disabilities act, and all other relevant laws and executive orders are full integrated into all of St. Lawrence County's and subrecipient' activities. State and federal nondiscrimination laws are the cornerstones of St. Lawrence County's strategy to ensure equal opportunity and fair and equitable programs and services to the public.

This policy incorporates throughout all of St. Lawrence County's operations the requirements of applicable State and federal laws and executive orders to prohibit any discriminatory practices, procedures and policies. All administrators, managers, supervisors and employees are directed to comply with these laws and orders.

All employees must assist in the prevention and elimination of any discriminatory practices and are encouraged to report allegations of discrimination to St. Lawrence County's Title VI Coordinator for review and appropriate action.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with St. Lawrence County. Any such complaint is preferably in writing and filed with St. Lawrence County's Title VI Coordinator. Title VI Discrimination Complaint Forms may be obtained from St. Lawrence County's Title VI Coordinator at no cost to the complainant, on our website at www.stlawco.gov, or by calling (315) 379-2292**.**

This policy will be available in the Planning Office, on Countywide Forms (transitioned to Intranet upon completion), upon request, the St. Lawrence County webpage and made available to all organizations and entities doing business with St. Lawrence County. Any

complaints involving allegations of discrimination should be submitted by mail, email, fax or in person to: St. Lawrence County's Title VI Coordinator, at 48 Court Street, Canton NY 13617, Tel: (315) 379-2292, Fax: (315) 379-2252, Email: planning@stlawco.gov

Chair

11/9/26
Date

Title VI Coordinator

The Title VI Coordinator is responsible for ensuring compliance with Title VI of the 1964 Civil Rights Act. The Title VI Coordinator plans, develops, monitors and enforces standards for compliance in St. Lawrence County's programs, services and benefits.

St. Lawrence County has appointed the Planning Director as Title VI Coordinator. The Title VI Coordinator has easy access to the Chair of the Board of Legislators. The contact information for the Title VI Coordinator is:

Title:	Planning Director
Mailing Address:	48 Court Street, Canton, NY 13617
Telephone Number:	(315) 379-2292
Email address:	planning@stlawco.gov

Designation of Title VI Program Specialist

In addition to appointing a Title VI Coordinator, the Title VI Coordinator designated a Title VI Program Specialists to annually monitor Federal Highway Administration program areas. The program areas are: Planning, Environment, Design, Right-of-Way, Construction, Contract Compliance, and Maintenance. The contact information for the Title VI Program Specialist is:

Title:	Highway Superintendent
Mailing Address:	44 Park Street, Canton, NY 13617
Telephone Number:	(315) 379-1542
Email address:	rherron@stlawco.gov

Program Administration and Responsibilities

As authorized by St. Lawrence County Board of Legislators, the Title VI Coordinator and Title VI Program Specialist are responsible for initiating, monitoring, and ensuring St. Lawrence County's compliance with Title VI requirements as follows:

1. Process, review and investigate Title VI complaints received by St. Lawrence County in accordance with St. Lawrence County's Title VI Complaint Procedures. If any individual believes they or any other program beneficiaries have been subject to unequal treatment or discrimination as to the receipts of benefits and/or services, or on the grounds of race, color, national origin, or gender, they may file a complaint with St. Lawrence County. It is the goal of St. Lawrence County to resolve complaints informally at the lowest managerial level.

2. Collect statistical data (race, color, income, gender, and national origin) of participants in and beneficiaries of St. Lawrence County's highway programs (i.e., relocatee's, impacted citizens, and affected communities). Each Title VI program area will maintain data to be incorporated in the Title VI updates. Procedures will be reviewed regularly to ensure the data is sufficient to meet the Title VI program administration requirements.

3. Coordinate with department heads to review program areas to determine the effectiveness of program area activities at all levels. In addition to the day-to-day monitoring, all program areas will be reviewed annually to assure effectiveness in their compliance of Title VI provisions. The Title VI Coordinator and Title VI Program Specialist will coordinate efforts to ensure equal participation in their program areas and activities at all levels.

4. Conduct Title VI reviews when necessary of contractors and other recipients of federal aid highway funds.

5. Work with program staff to ensure the fundamental principles of Environmental Justice outlined below:

   - Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

   - Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

   - Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

6. Develop Title VI information for public dissemination. Ensure dissemination to the public and, where appropriate, in languages other than English. The County will disseminate Title VI Program information to County employees, contractors, subcontractors, consultants, and subconsultants as well as the public. Public dissemination will include posting of public statements and inclusion of Title VI language in contracts. The Title VI/ Nondiscrimination Policy Statement will be published in newspapers having a general circulation near proposed projects and announcements of hearings and meetings in minority publications.

7. Conduct pre-grant and post-grant approval reviews of St. Lawrence County programs and applicants for compliance with Title VI requirements; i.e., highway location, design and relocation, and persons seeking contracts with St. Lawrence County.

8. Prepare an Annual Title VI Update Report. The update will report on any accomplishments and changes to the program occurring during the preceding year. The update will include goals and objectives for the upcoming year.

9. Schedule training for Title VI related statutes for St. Lawrence County employees. The training will provide comprehensive information on Title VI provisions, its application to program operations, identification of Title VI issues and resolution of complaints. All directives providing operational guidelines to all subrecipients, and program areas will be reviewed annually to include Title VI language and provisions and related requirements, where applicable.

10. Identify and eliminate discrimination when found to exist. Work with all St. Lawrence County offices and departments to establish procedures for promptly resolving deficiencies. Procedures will be implemented to identify and eliminate discrimination when found to exist, including, but not limited to utilization of disadvantaged business enterprises, public involvement and property acquisition.

11. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary within a period of 90 days. St. Lawrence County will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, procedures will be implemented to resolve Title VI issues, and reducing to writing remedial action agreed necessary within a period of 90 days.

    Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies.

    St. Lawrence County will seek the cooperation of the subrecipient in correcting deficiencies found during the Title VI compliance reviews. St. Lawrence County will also provide the technical assistance and guidance needed to aid the sub recipient to comply voluntarily.

    When a subrecipient fails or refuses to voluntarily comply with requirements within the allotted time frame, St. Lawrence County will submit a copy of the case file to NYSDOT's Office of Civil Rights or the FHWA and a recommendation that the sub recipient be found in noncompliance.

    A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

12. Maintain updated legislative and procedural information regarding St. Lawrence County's Title VI Program. This will include federal laws, rules and regulations, NYSDOT guidelines, St. Lawrence County's Plan and updates, and other resource information pertaining to Title VI issues.

Title VI Discrimination Complaint Procedures

Complaint Procedures for Federally Assisted Programs and Activities

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, relating to any transportation or Public Works program or activity administered by the County, as well as to sub recipients, consultants, and contractors. These procedures apply to complaints filed against a program or activity funded by either the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) or the Federal Aviation Administration (FAA).

Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process, which does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest managerial/administrative level possible. The option of informal mediation meeting(s) between the affected parties and the investigator may be used for resolution, at any stage of the process. The investigator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

Any person who believes that they or any specific class of persons has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities prohibited under Title VI based upon race, color, sex, age, national origin or disability may file a written complaint with St. Lawrence County.

<u>Time Limits for Filing</u>
A formal complaint must be filed within 180 days after:

- The date of the alleged act of discrimination; or
- The date when the person became aware of the alleged discrimination; or
- There has been a continuing or the latest instance of the discriminatory conduct.

<u>Form of Complaints</u>
A formal complaint must meet the following requirements:

- Must be in writing and signed by the person or their representative and include the complainant's name, address and telephone number. A formal complaint of discrimination will also be acknowledged and processed if received by fax or e-mail. A formal complaint of discrimination received by telephone will be written down and provided to the complainant for confirmation or revision before processing.
- Must provide a detailed description of the issues including names, dates, and job titles of witnesses or those individuals perceived as parties in the complained of incident.

Upon receipt of the complaint, St. Lawrence County will acknowledge receipt of complaint, determine jurisdiction, acceptability, need for additional information and the investigative merit of the complaint. In cases where the complaint is against one of St. Lawrence County's sub recipients of federal highway funds, St. Lawrence County will assume jurisdiction and will investigate and adjudicate the case. Complaints against St. Lawrence County will be referred to the New York State Department of Transportation's Office of Civil Rights for proper disposition. In special situations warranting intervention to ensure equity, the NYSDOT Office of Civil Rights may assume jurisdiction and either complete or obtain services to review or investigate matters.

Acceptance of a complaint will be determined by

- Whether the complaint is timely filed;
- Whether the allegations involve a covered basis such as race, color, national origin, gender, disability or retaliation;
- Whether the allegations involve a program or activity of a Federal-aid recipient
- The complainant(s) acceptance of reasonable resolution based on the Department's administrative authority;

A complaint may be dismissed for the following reasons

- The complainant requests the withdrawal of the complaint;
- The complainant fails to respond to repeated requests for additional information
- needed to process complaint;
- The complainant cannot be located after reasonable attempts.

St. Lawrence County has sole authority for accepting complaints for investigation. Once St. Lawrence County decides to proceed with the investigation, the complainant and the respondent will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a case number and be logged into St. Lawrence County's records identifying its basis, alleged harm, the race, color, national origin and gender of the complainant(s).

In cases where St. Lawrence County assumes investigation of the complaint, St. Lawrence County will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of St. Lawrence County's written notification of acceptance of the complaint to furnish their response to the allegations.

Within 40 calendar days of the acceptance of the complaint, St. Lawrence County or a NYSDOT investigator will prepare an investigative report for St. Lawrence County's Title VI Coordinator and the County Administrator. The report will include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition. Both St. Lawrence County's Title VI Coordinator and County Administrator will have 10 calendar days to review and provide comments to the investigator.

Once the investigator addresses any comments to the preliminary investigative report, the report and its findings will be forwarded to the Office of the County Attorney for review. The Office of the County Attorney will review the report and associated documentation and will provide input within 10 calendar days.

Any comments or recommendations from the Office of the County Attorney will be reviewed by the County Administrator. There will be a period of 10 calendar days for the County Administrator to discuss the report and any recommendations with the agency's Title VI Coordinator, and to have the Title VI Coordinator address any modifications before the report's release to the corresponding United States Department of Transportation (USDOT) modality (FHWA, FTA, FAA).

St. Lawrence County's final investigative report and a copy of the complaint may be forwarded to either NYSDOT, FHWA, FTA, or FAA, within 60 calendar days of the acceptance of the complaint.

St. Lawrence County will notify the parties of its preliminary findings which may be subject to the corresponding USDOT modality's concurrence.

The corresponding USDOT modality may issue the final decision to St. Lawrence County based on the investigative report.

Title VI Data Collection and Analysis Methods

St. Lawrence County is committed to assure efforts are made to prevent the discrimination of low-income and minority populations as a result of any impact of St. Lawrence County's programs or activities in accordance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and in Low-Income Populations. In addition, St. Lawrence County assures every effort will be made to provide meaningful access to persons with Limited English Proficiency, in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

Identifying and Understanding Affected Populations and Geographic Areas

This section reviews how St. Lawrence County's collects, displays and maps data, and conducts basic analysis to identify disparate impact.

To determine whether a protected class experiences disparate impact compared to other groups, relevant demographic data for St. Lawrence County's projects and programs can be collected and analyzed. Available data sources include: Real property tax records; statistical data published by the US Census Bureau, the US Department of Housing and Urban Development (HUD), New York State departments such as the Department of Labor and Office of General Services; annual community surveys by SUNY Jefferson Community College's (JCC) Center for Community Studies; Environmental Screening Tools (EST); driver and ridership surveys; and voluntary demographic data provided by participants at County public involvement events. Self-identification of personal information provided to St. Lawrence County is always voluntary and anonymous and will not be released or otherwise used in any manner inconsistent with federal regulations.

St. Lawrence County may also collect demographic data (race, color, income, gender, and national origin) of persons affected by the County's highway programs or other federally funded programs including persons who were relocated, impacted citizens, and impacted communities. The statistical data will serve to document how St. Lawrence County's procedures and policies provide equal and fair treatment to all of the impacted population.

Tools used for Analysis

The County consistently uses Excel and ArcGIS when reviewing and analyzing data from the County Real Property Tax Office; US Census Bureau; HUD; New York State departments such as the Department of Labor and Office of General Services; and annual community surveys conducted by Jefferson Community College's Center for Community Studies.

Ensuring Data Collection Methods are Unbiased

Because the County's real property tax records only account for persons who own property, the County relies on data provided by regional, state and national organizations. The methodologies published by the Census Bureau, HUD, New York State departments and by JCC's Center for Community Studies report their data is based on a random pool of survey respondents and is statistically significant with known margins of error.

Recent Examples of How Data Collection Improved Title VI Compliance

Over the past five years, public transit bus service was established or expanded in Massena, Gouverneur, Potsdam and Canton, four population centers with higher concentrations of low to moderate income households, persons with disabilities, and more racially diverse community populations. St. Lawrence County Public Transit established bus service in Massena and in Akwesasne, a Mohawk reservation in neighboring Franklin County; established a connecting bus service to Jefferson County Public Transit in Gouverneur; and established a high volume transfer location at the Potsdam Walmart so that college students can conveniently access other public transit routes that service the stop.

Title VI Monitoring

St. Lawrence County's Title VI compliance requires the monitoring of all program areas regardless of whether the program area receives direct federal funding from FHWA or NYSDOT. St. Lawrence County's Title VI monitoring ensures that all activities are conducted in a nondiscriminatory manner and appropriate procedures are put in place for the collection of related data. Agency management, supervisors and staff are required to cooperate in these monitoring efforts. It is important that St. Lawrence County's employees and subrecipients understand and play a role in Title VI compliance in order to ensure the continued receipt of federal funds.

What Activities Are Monitored?

In accordance with 23 CFR 200.9 (b) (10) & (11), an annual report of St. Lawrence County's Title VI accomplishments for each year and goals for the next year are developed and maintained. The annual Title VI accomplishment report contains information that is used to evaluate St. Lawrence County's Title VI program. Major program areas (Planning, Environment, Design, Right-of-Way, Construction, Maintenance, Safety, and Research) are monitored by the agency's Title VI Coordinator to ensure procedures and processes are in compliance with Title VI. St. Lawrence County's Title VI findings and efforts initiated toward compliance may be annually reported to the NYSDOT.

The following information, if applicable, will be reviewed by the agency's Title VI Coordinator:

- Information related to studies conducted that provided data relative to minority individuals, neighborhoods, income levels, physical environment and travel habits.
- The number and location of annually scheduled public meetings and hearings held.
- Type of record keeping used to document citizen participation in public meetings and public hearings.
- Title VI training and dates of training provided by your agency or program areas.
- Major goals and accomplishments made during the year regarding Title VI. Include where Title VI issues were identified and discrimination was prevented.
- Action taken to address any Environmental Impact Studies where minorities, women, elderly, disabled and low-income persons were adversely impacted.
- Whether the use of bilingual or non-English advertisements, announcements, notices, etc., to meet Limited English Proficiency (LEP) needs.
- Whether interpreters were present when needed to assist with LEP needs.
- Whether negotiation reports related to real estate transactions indicated a disparity in negotiation procedures between minorities and non-minorities.
- Procedures or process used to identify which communities (minorities, women, elderly, disabled, and low-income) were represented in the negotiation phase.

- The number of relocations during the reporting period.
- The number of construction projects initiated in the reporting period.
- Procedures or process in place to monitor Title VI compliance as it relates to special emphasis programs (Planning, Environment, Design, Right-of-Way, Construction, Maintenance, Safety).
- The number of Title VI complaints received, status of complaints, and resolution of complaints.

St. Lawrence County's Title VI Coordinator or their designee will annually review the agency's operations to ensure compliance with Title VI. In addition, all contracts with subrecipients, if any, will be reviewed by St. Lawrence County's Legal Department which ensures all FHWA related contracts include the Title VI Standard Assurances, including Appendices A through E Nondiscrimination Clauses.

All Title VI Discrimination Complaints received during the previous year will be reviewed again by the agency's Title VI Coordinator, the program area's Title VI Coordinator and an attorney from St. Lawrence County's Legal Department to determine if there are any repetitive issues. If any repetitive issues are identified, the issues will be investigated again with attention given as to why there was a repetitive issue and what can be done to correct the issue. St. Lawrence County will take administrative action to address the complaint and then evaluate whether the administrative action has eliminated or resolved the complaint. The resolution of all Title VI complaints filed with St. Lawrence County will be forwarded to the Director of the NYSDOT's Office of Civil Rights.

Public Participation Plan

St. Lawrence County values and welcomes public participation in its transportation planning and program efforts, initiatives and decision-making. The following Public Participation Plan (PPP) establishes a process that allows citizens, public agencies, transportation providers, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, low and moderate income persons, minority groups and other interested parties with reasonable opportunities to be involved in the transportation planning process.

Public Participation Goals

Citizens who take the time to participate in public processes should feel their participation is valued. St. Lawrence County commits to the following goals for an effective public participation program:

- Promote a transparent process
- Encourage broad participation
- Engage for impact
- Build knowledge

Guiding Principles

St. Lawrence County's PPP is based on the following principles:

1. Public participation is an activity that requires teamwork and commitment at all levels of St. Lawrence County's organization.
2. One size does not fit all. Input from diverse perspectives improves the process.
3. Effective public outreach and involvement requires relationship building with local citizens and advisory groups.
4. Engaging interested persons or groups in St. Lawrence County's transportation issues is possible by: Making transportation issues relevant; removing barriers to participation; and by communicating in clear language and visuals.
5. An open and transparent public participation process empowers all communities to participate in decision-making that affects them.

Public Meetings and Notices

When undertaking a federally funded project, St. Lawrence County complies with all federal and State requirements regarding public participation. If statutorily required, formal public hearings are conducted, and legal notices are placed in the County's official newspapers and posted on the County website. Likewise, public participation meetings are held as required to inform the public of a proposed project or action. In addition to satisfying legal notice

requirements, St. Lawrence County typically e-mails announcements to distribution lists and distributes press releases to local media outlets. Summaries of public hearings and outreach events are prepared for the project record by department staff.

Accessible Meeting Locations

The County's business functions, public meetings and polling places are held in locations that are accessible to persons with disabilities. For other locations hosting County events, accommodations will be provided upon request. Persons are invited to contact the Planning office at (315) 379-2292 at least 48 hours in advance of any meeting in which accommodations may be required.

Public Engagement Methods

- Events are located and scheduled to maximize public participation. Meetings, workshops and open houses are held at varied times of day, including evening hours, to encourage participation
- Deliver presentations to existing groups and organizations; co-host events with community groups, business associations, etc.
- Table at community events
- Contract with community-based organizations in low-income and minority communities for targeted outreach
- Organize small-group discussions such as focus groups with participants recruited by stakeholder interest groups

Outreach Sources

St. Lawrence County uses the following outlets to promote public participation:

<u>Online and Social Media</u>

- Posting updated content on the County website including written materials and exhibits; posting survey questionnaires; and posting notices of events such as open houses and workshops to obtain community feedback
- Posting announcements and updates on social media and through email distribution lists to reach a larger audience

<u>Local Media</u>

- Writing and distributing press releases
- Inviting reporters to news briefings
- Meeting with editorial staff
- Writing and posting opinion pieces/commentaries
- Purchasing advertising space
- Participating in interviews with radio/local television stations

- Preparing and disseminating public service announcements
- Developing content for public access/cable television programming

Community Organizations

- Announcing participation opportunities through community organizations such as the Star Lake Bargain Hunter and Black Lake Chamber of Commerce newsletter

Incorporating Public Feedback

The following five strategies are in place to incorporate public feedback in St. Lawrence County's transportation planning and design decisions.

Strategy 1: Early and Continuous Engagement
St. Lawrence County welcomes and pays attention to the views of the public and structures its major planning initiatives and funding decisions to provide for meaningful opportunities to help shape outcomes.

Strategy 2: Access to All
St. Lawrence County works to provide all residents opportunities for meaningful participation, regardless of disability or language barrier. The County also recognizes that citizens should not be transportation professionals to understand written and verbal communications from staff. At its outreach events, County staff deliver project presentations which include: Reviewing project scopes of work; resources for project implementation; and project timeframe. Questions and feedback are then requested from attendees, with an opportunity to submit written information within a specified timeframe.

Strategy 3: Response to Comments
St. Lawrence County is committed to reviewing and evaluating the merit of the feedback received and examining if suggestions can be reasonably incorporated into project proposals. For public hearings and community meetings, public feedback is summarized for the project record or is summarized in advisory board meeting minutes.

Strategy 4: Inform Agency's Chief Executive Officer and Legislative Branch of Areas of Agreement and Disagreement
St. Lawrence County's staff also convey public comments on issues going before its legislative branch to help ensure its top administrator and elected officials have a clear understanding of the opinions and options on a given issue, including areas of agreement and disagreement.

Strategy 5: Notify Public of Proposed or Final Actions
St. Lawrence County strives to inform the public about how public meetings and participation help shape or contribute to key decisions and actions. Official actions taken by the County Legislature are included in the public meeting record and posted on the County's website.

When outcomes don't correspond to the views expressed, efforts are made by County staff to explain why the outcomes did not correspond with the expressed views.

Techniques for Involving Limited-English Proficient Populations

- See St. Lawrence County's Plan for Limited English Proficient (LEP) Populations
- Train staff to be alert to anticipate the needs of LEP participants at meetings and workshops
- Translate materials; have translators available at meetings as requested
- Include information on meeting notices on how to request translation assistance
- On-call translators for meetings on request

Recent Examples of Outreach Programs Demonstrating Title VI Compliance

Meeting announcements for County advisory boards staffed by the County Planning Office are distributed to local media; and to organizations that serve persons who are disabled, or assist protected classes under federal and State Fair Housing laws (e.g. Maximizing Independent Living Choices (MILC), CNY Fair Housing, the Watertown Attorney General's Office and the Legal Aid Society of Northeastern New York attend County Fair Housing Task Force meetings), as well as organizations that provide services to environmental justice communities or minority populations (e.g. Mohawk Indian Housing Authority, SUNY Canton, SUNY Potsdam, and Clarkson University attend the County's Public Transit Task Force meetings). Persons who are unable to attend these meetings in person may participate in these meetings virtually.

Challenges Encountered in Implementing Outreach Activities

None.

Title VI Training

The County's Title VI Coordinator developed an on-demand training module that is completed by every County employee. The training reviews Title VI provisions, its application to program operations, identification of Title VI issues and resolution of complaints. The training is provided to all new employees when they begin employment and is disseminated by Department heads to all County employees annually. At the completion of training, all employees are required to sign and date an acknowledgement of receiving and understanding the training. Every employee submits the signed and dated form to their Department Head for record keeping. The Title VI Coordinator is available to answer questions and provide further training as needed.

Program Areas

Planning

Develop near-term and long-term strategies to maintain and enhance the quality and safety of St. Lawrence County's transportation and infrastructure.

Title VI Responsibilities

- Ensure that all aspects of the transportation planning process comply with Title VI.
- Ensure participation of a cross section of various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic organizations and participating in roundtable meetings in minority and low-income communities when applicable.
- Assist the Title VI Coordinator in gathering and organizing information for internal annual Title VI Update Reports.
- Review the Program Development work program and other directives to ensure compliance with Title VI program requirements.
- Ensure equal participation on Citizens Advisory Committees (CAC) by requesting the CAC provide information regarding their selection process for members and to furnish information on membership make up (race, gender, and position within the organization) for evaluation.
- Visit CAC and public meetings to verify the level of participation of Title VI protected group members when offered in predominantly minority or low-income communities.
- Gather statistical data on program participation regarding race, color and national origin.

Consultant Services/Environmental

Consultant Contracts Administration

Identify the needs for each project, ensure they are met in the contract, and ensure consultant compliance to the satisfaction of St. Lawrence County.

Authorities:

48 CFR 31; 23 CFR 172
National Environmental Policy Act of 1969, 42-USC-4321
23 CFR Part 771
40 CFR Part 1500
49 CFR Part 622
EO 12898

Consultant Selection Process

Utilizing the request for proposal and competitive bidding processes, St. Lawrence County selects the appropriate contractors and vendors for the project. Title VI nondiscrimination provisions will be incorporated into all written contracts and materials in this process.

Environmental Process

Work with neighborhood stakeholders and community groups to ensure that all affected residents have opportunities to participate in the planning, design and construction of transportation projects.

Environmental Justice Outreach

Public Involvement in Environmental Justice will be achieved through outreach measures that assure meaningful involvement of minority and low-income populations. This will be achieved through a variety of measures, including but not limited to:

- Obtaining US Census Data and school district enrollment data to identify minority and low-income populations to determine impacts during the initial stages of project planning. Additional sources include information from community, religious, and business associations, school districts, senior citizen groups, and economic development organizations.
- Inviting a cross section of the populace from social, economic, and ethnic groups in the planning process through written information in local newspapers and community organizations. Create notices that attract attention and are in layman's terms.
- Holding meetings at a variety of times during the day and in various locations to facilitate access and participation by target populations.
- When necessary, translate documents, notices and hearings upon request for Limited English Proficiency populations.
- Obtaining demographic data at applicable community meetings and public hearings. Data will be gathered using voluntary self-reporting forms which include race, gender, and national origin. Copies of these forms will be sent to the Title VI Coordinator after each meeting.
- Document all evidence to support conclusions regarding Environmental Justice issues. Detail all efforts taken to identify minority or low-income populations affected by transportation planning activities.

Title VI Responsibilities

- Monitor compliance with Title VI requirements in all aspects of the environmental process, including Environmental Justice.
- Conduct meetings to review the project impact.

- Disseminate to the public their right to call or write the department to view plans and discuss environmental problems.
- Ensure DBE goal attainment.
- Coordinate the gathering of environmental information for the Annual Title VI Update Report including awards to DBE firms.
- Notify protected group residents of public meetings or hearings regarding a proposed project. Ensure time and location for public meetings or hearings is accessible.
- Maintain mechanisms to identify population affected by a project.
- Ensure participation of all segments of the impacted population in the location selection process.
- Ensure that all federally funded consultant contracts administered by this section have the appropriate Title VI Appendix enclosed.
- Review guidelines and procedures to ensure Title VI compliance.
- Maintain and update necessary data and documentation, including demographic data mapping ethnicity by area as required for completion of the department's internal annual Title VI Update Report.

Engineering Services

Engineering Services

Engineering services assess St. Lawrence County's infrastructure and prepares plans for construction, design, and repair. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

Authorities

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Rochester; Title 23, U.S.C 109(d), 14(a), 217, 315 and 402(a); 23 CFR 1204.4; 23 CFR 771; EO 12898; 49 CFR 1.48(b)(33) and 1.48(c)(2); among others.

Design Process

Economic, social, topographic, and environmental impacts of a proposed project are key factors weighed in the location consideration. Special efforts in Environmental Justice will be made to

inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

Construction

Construction deals with the construction and management of infrastructures such as highways, bridges, airports, railroads, buildings, and utilities. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

Authorities

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Rochester, among others.

Construction Process

Construction is responsible for new construction and maintaining St. Lawrence County roads and bridges by using the resources of contractors, equipment, and materials in the most economic way. Construction provides guidance and oversight for the administration of transportation construction projects. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

Title VI Responsibilities

- Review all projects for inclusion of DBE goals. Gather statistical data on DBE utilization.
- Ensure that all aspects of the location selection process comply with the Title VI requirements.
- Consult and seek input from affected populations.
- Develop mechanisms to identify affected populations.
- Assure public participation in the selection process.
- Provide notice of public meetings in minority newspapers and newsletters when appropriate.
- Maintain required Title VI compliance documentation and statistical data. Gather statistical data on race, color & national origin for program requirements.

- Monitor program components for compliance with the Title VI requirements.
- Review activities associated with public hearings to enhance the participation of targeted communities.
- Develop and update operational manuals and guidelines to ensure the inclusion of Title VI language and provisions.
- Gather program area data to be included in the internal annual Title VI Update Report.

Right-of-Way

Right-of-Way Programming

Right-of-way programming involves monitoring and administering construction and obstructions in the right-of-way. Right-of-Way programming is handled by the Permitting Department of DES and involves inspections and compliance measures in the right-of-way.

Authorities:

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Rochester, 23 CFR 130, 49 CFR 24, among others.

Acquisition Process

The guidelines in the Right-of-Way Manual are followed for property acquisition as well as all applicable laws and regulations, including Title VI and Section 504. The right of way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, businesses, farm operations, nonprofit organizations, and property management.

Title VI Responsibilities

Ensure equal opportunity for disadvantaged businesses to participate in Personal Services Contracts. The contracts are typically appraisal contracts but can cover all services of real estate including negotiation, relocation, and property management. Ensure equal opportunity for disadvantaged business appraisers to participate by using current directories identifying fee appraiser organizations and the NYSDOT's list of certified fee appraisers. Apprise all affected property owners, tenants, and others involved of their rights and options regarding negotiation, relocation, condemnation and other aspects of the acquisition process.

- Conduct annual implementation reviews of Title VI provisions within the real estate acquisition process.
- Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate clauses, including Title VI Assurances.
- Ensure that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment.
- Ensure comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.
- Maintain statistical data including race, color, national origin, and sex on all relocatees affected by federally funded projects and provide detailed demographic data quarterly to the Title VI Coordinator.
- Gather the statistical data required for completion of St. Lawrence County's Annual Title VI Update Report including awards to minority and female appraisers.

Contracts

Contracts

Contracts ensure that that St. Lawrence County contract provisions include nondiscrimination and equal opportunity employment language: that St. Lawrence County may not discriminate in any programs or services based on race, color, sex, or national origin.

Authorities:

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of St. Lawrence County, among others.

Title VI Responsibilities

- Include Title VI language in contract award letters to encourage utilization of DBE firms. Award of construction contracts shall be granted based on the lowest responsive bidder including DBE requirements.

- Ensure through reviews that prime contractors with DBE requirements award previously committed work to proper DBEs and that DBEs perform commercially useful functions on contracts.
- Review activities to ensure maintenance and construction efforts and resources are applied uniformly and fairly.
- Maintain program documentation necessary for internal annual Title VI updates.

Attachment 1

Standard Title VI / Non-discrimination Assurances

Standard Title VI/Non-Discrimination Assurances

St. Lawrence County (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through ***the New York State Department of Transportation (NYSDOT)***, is subject to and will comply with the following:

Statutory/Regulatory Authorities
• Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.,* 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
• 49 C.P.R. Part 21 (entitled *Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);*
• 28 C.P.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances
In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, "for which the Recipient receives Federal financial assistance from DOT, including the ***NYSDOT****.*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances
More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted *Section 5311 programs and BridgeNY funds:*

1. The Recipient agrees that each "activity," "facility," or "program," as defined in§§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all *Section 5311 programs and BridgeNY funds* and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"St. Lawrence County, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 US. C.§§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.

4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.

5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.

7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:

a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.

8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
b. the period during which the Recipient retains ownership or possession of the property.

9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, *St. Lawrence County* also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the *NYSDOT, Federal Highway Administration, and Federal Transit Administration's* access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the *NYSDOT, Federal Highway Administration, and Federal Transit Administration*. You must keep records, reports, and submit the material for review upon request to *NYSDOT, Federal Highway Administration, and Federal Transit Administration,* or its designee in a timely, complete, and accurate way.

Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

St. Lawrence County gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the *Federal Highway Administration*

and Federal Transit Administration. This ASSURANCE is binding on the State of ***New York***, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the *Section 5311 programs and BridgeNY funds.* The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

St. Lawrence County

by _____
David Forsythe, Chair

DATED 10/26/26

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Motor Carrier Safety Administration (FMCSA), as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

2. **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, sex, age, or disability, in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations as set forth in Appendix E, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 C.F.R. Part 21, including any amendments thereto.

3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, national origin, sex, age, or disability.

4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FMCSA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FMCSA, as appropriate, and will set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FMCSA may determine to be appropriate, including, but not limited to:

    a. withholding payments to the contractor under the contract until the contractor complies; and/or
    b. cancelling, terminating, or suspending a contract, in whole or in part.

6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FMCSA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request

the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

CLAUSES FOR DEEDS TRANSFERING UNITED STATES PROPERTY

APPENDIX B

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the Department of Transportation as authorized by law and upon the condition that ***St. Lawrence County*** will accept title to the lands and maintain the project constructed thereon in accordance with ***Section 5311 of Title 49, United States Code, Title 23, United States Code,*** the Regulations for the Administration of **Federal Motor Carrier Safety Administration (FMCSA) Program,** and the policies and procedures prescribed by the **FMCSA** of the Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, part 21, Non-discrimination in Federally-assisted programs of the Department of Transportation, including any amendments thereto, pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto ***St. Lawrence County*** all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto ***St. Lawrence County*** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on ***St. Lawrence County,*** its successors and assigns.

St. Lawrence County, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that ***St. Lawrence County*** will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, part 21, Non-discrimination in Federally-assisted programs of the Department of Transportation, including any amendments thereto, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of Title VI.)

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY OR PROGRAM

APPENDIX C

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by ***St. Lawrence County*** pursuant to the provisions of Assurance 7(a):

A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:

    1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, ***St. Lawrence County*** will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*

C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, ***St. Lawrence County*** will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of ***St. Lawrence County*** and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to effectuate the purpose of Title VI.)

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

APPENDIX D

The following clauses will be included in deeds, licenses, permits, or similar instruments/ agreements entered into by ***St. Lawrence County*** pursuant to the provisions of Assurance 7(b):

A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.

B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, ***St. Lawrence County*** will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, ***St. Lawrence County*** will there upon revert to and vest in and become the absolute property of ***St. Lawrence County*** and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to effectuate the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

- Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 2000d *et seq.),* (prohibits discrimination on the basis of race, color, national origin), as implemented by 49 C.F.R. Part 21.1 *et seq.,* including any amendments thereto, and 49 C.F.R. part 303;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601) (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973 (23 U.S.C. § 324 *et seq.)* (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 *et seq.)* (prohibits discrimination on the basis of disability); and 49 C.F.R. part 27;
- The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 *et seq.)* (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982 (Pub. L. 97-248 (1982)), as amended (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987 (102 Stat. 28) *("..... which restore[d] the broad scope of coverage and to clarify the application of title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and title VI of the Civil Rights Act of 1964.");*
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 - - 12189), as implemented by Department of Justice regulations at 28 C.F.R. parts 35 and 36, and Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. § 1681 *et seq).*

Attachment 2

Title VI Discrimination Complaint Form

St. Lawrence County Title VI 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**

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.

St. Lawrence County
Planning Director: Title VI Coordinator
48 Court Street
Canton, NY 13617
planning@stlawco.gov

This complaint may also be filed directly with the New York State Department of Transportation, Office of Civil Rights, 50 Wolf Road, 6th Floor, Albany, NY 12232, (518) 457-1129 Fax (518) 549-1273, OCR-TitleVI@dot.ny.gov or the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Attachment 3

Americans with Disabilities Act (ADA) Transition Plan

This ADA Transition Plan reflects St. Lawrence County's long-term commitment to ADA compliance and details the plans phases and timeline to: (1) Evaluate accessibility by identifying any structural barriers associated with public facilities; (2) Identify accommodations and/or modifications that can be provided to make programs and services accessible; and (3) Prioritize the remediation of deficiencies and formulate budgets and schedules for improvements.

INTRODUCTION

ADA regulations prohibit discrimination against individuals on the basis of disability and require state and local governments to make their programs and services accessible to persons with disabilities. These requirements focus on providing accessibility by addressing and eliminating structural barriers associated with public facilities.

The purpose of this Plan is to ensure St. Lawrence County identifies prohibited structural barriers to its public facilities, and, where structurally feasible, schedules and implements ADA required improvements in order to remove those barriers.

The ADA requires that the Transition Plan includes the following components:

1) Identification of physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;

2) Identification of the methods to be used to remove any barriers limiting accessibility;

3) A schedule for completion of the necessary steps to achieve accessibility in public facilities; and

4) The name of the public entity's ADA Coordinator.

STEP 1: IDENTIFYING PHYSICAL BARRIERS IN ST. LAWRENCE COUNTY FACILITIES

The first phase of the ADA Transition Plan evaluated St. Lawrence County's public facilities for accessibility. The evaluation of public buildings, parking lots, sidewalks, crosswalks, and curb ramps was initiated in 2021. Outdoor facilities were evaluated prior to the winter season to avoid snow cover that may impede a thorough review, and evaluations of indoor facilities continued during the winter months.

<u>Evaluating Sidewalks, Crosswalks, and Curb Ramps</u>

The County applied the following rating system to assess the condition of each County sidewalk, crosswalk, and curb ramp:

Rating 1 – Not Applicable: A facility not considered to require accessibility, for example, limited-access highways.

Rating 2 – Not Accessible: Significant discontinuity such as steps, no ramps, more than 100 feet of unpaved walkway, heaving, vertical displacement, other severe distress, flooding, etc.

Rating 3 – Partially Accessible: Not designed to current standards, problems with geometry of sidewalks, ramps and landings, no detectable warnings, handrails, etc.

Rating 4 – Accessible: May need additional improvements, for example circuitous routes, insufficient width, etc.

Rating 5 – Fully Accessible: Designed to current standards, but reasonable accommodations may still be required for individual cases.

STEP 2: IDENTIFYING METHODS TO REMOVE BARRIERS

The second phase of St. Lawrence County's ADA Transition Plan developed methods to remove barriers. This included identifying the nature of needed improvements, determining the structural feasibility of improvements under the ADA standards, and prioritizing necessary improvements.

Sidewalks, Crosswalks and Curb Ramps

With respect to sidewalks, crosswalks and curb ramps, the primary focus was to address ADA noncompliant facilities with an evaluation rating of "2" and "3".

Improvements to these facilities were prioritized as follows:

1) Those serving publicly accessible St. Lawrence County facilities;
2) Those serving commercial and employment centers; and
3) Those serving other areas.

Parking Lots and Publicly Accessible Buildings

Improvements to parking lots and publicly accessible spaces in St. Lawrence County buildings were prioritized based on the severity of the accessibility barrier and the frequency of public presence at the facility. Notably, the general assessment of the Village of Canton Code Enforcement Officer was that St. Lawrence County facilities where public meetings take place are in substantial compliance with the ADA.

STEP 3: SCHEDULE OF IMPROVEMENTS TO COMPLY WITH AMERICANS WITH DISABILITIES ACT REQUIREMENTS

Over the last five years, the County prepared scopes of work and budget estimates for improvements to County facilities and their associated sidewalks, curbs and ramps which addressed accessibility barriers and complied with the Americans with Disabilities Act. These projects include:

- Constructing ADA-compliant County Highway outposts in the towns of Russell (2022), Lisbon (2022) and Potsdam (under construction)
- Installation of an ADA-compliant ramp to the County Surrogate Building located at the intersection of State and Judson Streets (2024)
- Installation of an ADA-compliant bus shelter and compliant sidewalk decking along the front elevation of the Harold B. Smith Building at 7 Judson Street (2024)
- Complete renovation of the County Public Safety Complex and building sidewalk at 49 ½ Court Street which made the building ADA-compliant (2025)
- Installation of an ADA-compliant bus shelter, compliant sidewalk decking and automated door at the north elevation of the County Human Services Center located at 80 State Highway 310 (2025).
- Renovating the first floor of the County Courthouse to construct a family courtroom and office space that are ADA-compliant (2026)

Before the end of the 2026 construction season the County is resurfacing parking lots at the Courthouse, Public Safety Complex and Harold B. Smith Building to be at grade with the Village of Canton's sidewalk and street network. The County is also in the process of modifying its website to be ADA compliant and is scheduled for completion during the first half of 2027.

The County also complies with ADA requirements on all of its resurfacing, bridge and highway facility projects.

ADA COORDINATOR

St. Lawrence County's ADA Coordinator is the Superintendent of Buildings and Grounds.

ADA Coordinator:	Superintendent of Buildings and Grounds
Name of Agency:	St. Lawrence County
Address:	48 Court Street, Canton, NY 13617
Telephone Number:	(315) 379-2273
Email Address:	buildingsandgroundsoffice@stlawco.gov

Attachment 4

Title VI Notice to the Public

St. Lawrence County hereby gives public notice of its nondiscrimination policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, gender, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which St. Lawrence County receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with St. Lawrence County. Any such complaint must be in writing and filed with the City Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence.

For more information, or to obtain a Title VI Complaint Form and instructions on how to file a discrimination complaint at no cost to the complainant: Access our web-site at www.stlawco.gov; write to the address below; or call the phone number below. If this Notice is needed in another language, contact our office at:

St. Lawrence County
Attention: Planning Director, Title VI Coordinator
Address: 48 Court Street, Canton, NY 13617
Telephone: (315) 379-2292
Email: planning@stlawco.gov

Attachment 5

Environmental Justice Policy

While St. Lawrence County realizes the minority or low-income population may be small, this does not eliminate the possibility of a disproportionately high and adverse effect of a proposed action.

St. Lawrence County understands population size is not the basis for EJ intervention. Disproportionately high and adverse effects, not size, are the bases for EJ. A small minority or low-income population does not eliminate the possibility of a disproportionately high and adverse effect on these populations.

St. Lawrence County ensures the three fundamental Environmental Justice principles will be considered in its planning activities:

a. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.
b. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
c. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

Title VI and Environmental Justice applies to all of St. Lawrence County planning and project development programs, policies and activities. During project development, EJ will be considered in all decisions that require Environmental Impact Statements, Environmental Assessments, Categorical Exclusions, or Records of Decision. Impacts to the natural and human environment will be given equal consideration during the transportation decision making process.

Executive Order 12898 states that "…each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations…" This order, signed by President Clinton in 1994, was followed by several United States Department of Transportation (USDOT) and Federal Highway Administration Orders that established procedures for implementation.

When It Is Required
This order applies to all federal actions, including projects that receive federal permits or federal funding.

- Identifying minority and low-income populations. Available data sources include: Real property tax records; statistical data published by the US Census Bureau, the US

Department of Housing and Urban Development (HUD), New York State departments such as the Department of Labor and Office of General Services; annual community surveys by SUNY Jefferson Community College's (JCC) Center for Community Studies; Environmental Screening Tools (EST); driver and ridership surveys; and voluntary demographic data provided by participants at County public involvement events.

- Providing opportunities for participation and comment by potentially affected communities.
- Assessing if there are Environmental Justice adverse effects, i.e., if there are disproportionately high impacts to minority and low income populations including:
    - bodily impairment, infirmity, illness or death;
    - air, noise, and water pollution and soil contamination;
    - destruction or disruption of man-made or natural resources;
    - destruction or diminution of aesthetic values;
    - destruction or disruption of community cohesion or a community's economic vitality;
    - destruction or disruption of the availability of public and private facilities and services;
    - vibration;
    - adverse employment effects;
    - displacement of persons, businesses, farms, or nonprofit organizations;
    - increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community;

Attachment 6

Limited English Proficiency Plan

St. Lawrence County

Signed by:

Chair: _____

Date: 11/9/26

E-Mail Address: planning@stlawco.gov

Telephone Number: (315) 379-2292

INTRODUCTION

This *Limited English Proficiency Plan* was prepared to address St. Lawrence County's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with Limited English Proficiency. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency,* states that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination which is covered under Title VI. It directs each agency (e.g., FHWA) to publish guidance for its respective recipients (e.g., NYSDOT) clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds and extends to its sub recipients. All contractors or subcontractors performing work for St. Lawrence County are required to follow the Title VI/LEP guidelines.

PLAN SUMMARY

St. Lawrence County developed this *Limited English Proficiency Plan* to help identify reasonable steps to provide language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and notification to LEP persons regarding the availability of assistance.

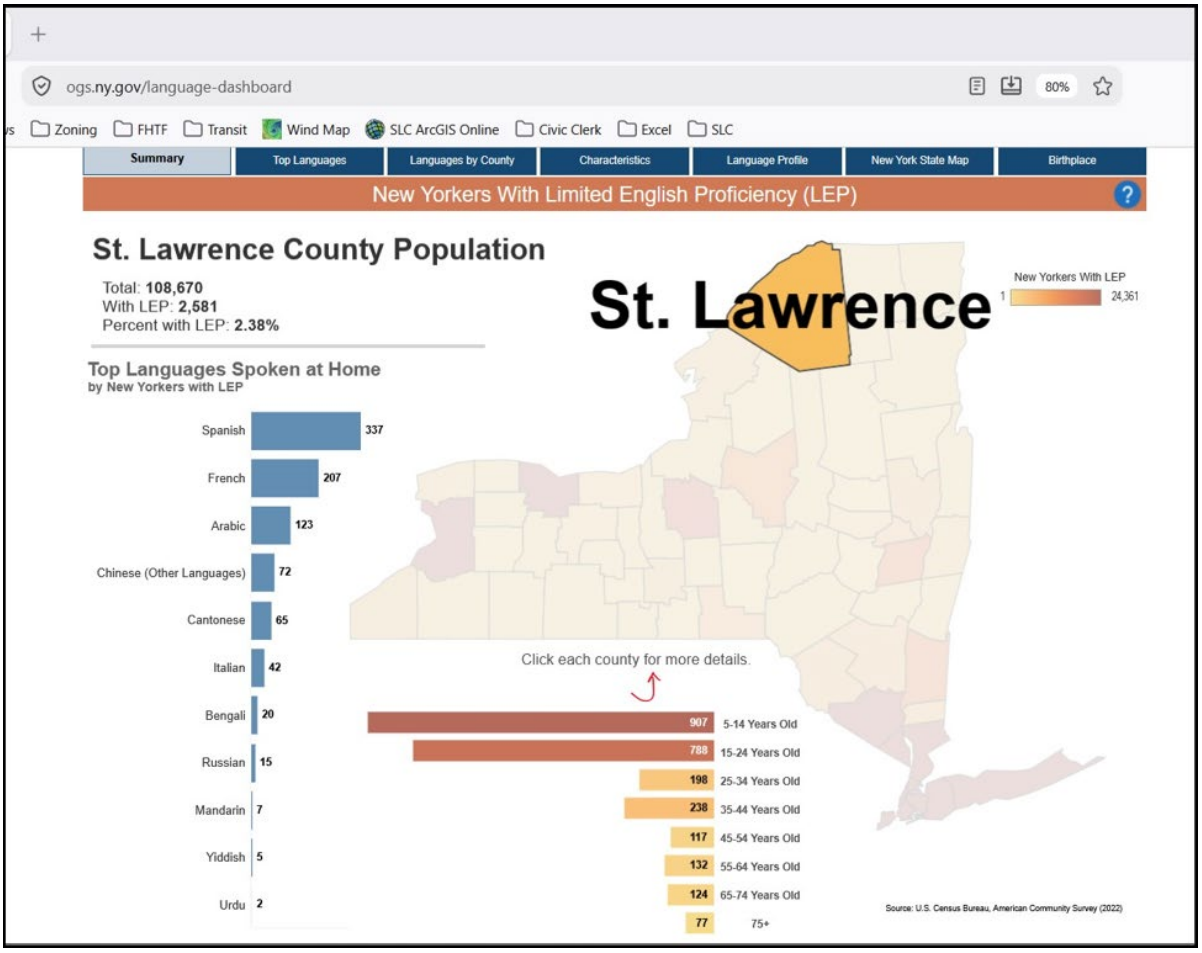
To prepare this plan, St. Lawrence County used the Federal Highway Administration (FHWA) Four-Factor LEP analysis:

1. The number or proportion of LEP persons in the service area who may be served by St. Lawrence County.
2. The frequency with which LEP persons come in contact with St. Lawrence County's services.
3. The nature and importance of services provided by St. Lawrence County to the LEP population.
4. The interpretation services available to St. Lawrence County and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is found in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served by St. Lawrence County.

The New York State Office of General Services utilized 2022 American Community Survey data to create an online language dashboard to estimate the number of limited English proficiency populations at the county level. Of the 108,640 persons who reside in St. Lawrence County, 2,581 residents or 2.4% of the county's population has limited English proficiency (LEP). None of the foreign languages spoken in the county's LEP households exceeds 1,000 persons or 5% of the county's population. The top three languages spoken at home are: Spanish (337 residents); French (207 residents); and Arabic (123 residents).



2. The frequency with which LEP persons come in contact with St. Lawrence County's services.

St. Lawrence County staff are most likely to encounter LEP individuals through office visits or when out in the field. On average, County Adult Protective Service and Child Protective Service staff estimate they come into contact with LEP persons once per month. The County Sheriff's deputies estimate they come into contact with LEP persons three to five times per month. The County's Public Health Department estimates they come into contact with LEP persons three to four times per year. The County Department of Motor Vehicles assists LEP persons who require translation services once per year. The County Highway Department reports no interactions with LEP persons in the design and construction of federally funded highway and bridge projects.

The County assumes LEP Persons may come into contact with its public transit system through routes 67, 68 and 69 which service Clarkson University, SUNY Canton and SUNY Potsdam campuses. These routes operate seven days per week from August to May. None of the transit drivers for these routes have reported receiving requests for assistance from LEP passengers. Within the past few years, the public transit system had a single encounter with LEP passengers who boarded Route 70B in Massena and traveled to the Akwesasne Mohawk reservation in an attempt to migrate into Canada.

3. The nature and importance of services provided by St. Lawrence County to the LEP population

   Adult Protective Service and Child Protective Service staff assist LEP persons when responding to welfare checks; arranging emergency housing; and when providing temporary assistance. County Sheriff's deputies may interact with LEP persons when responding to emergency calls to area farms; when investigating human trafficking violations; and during traffic stops. Public Health staff have interacted with LEP persons when administering immunization programs; when treating LEP persons with a communicable disease; or when providing early childhood development intervention services to parents. The County DMV assists LEP persons with the issuance of identification cards; administering drivers tests; issuing driver permits and licenses; and with vehicle registrations.

   2024-2025 enrollment data for colleges served by public transit indicate 140 students are non-resident aliens at Clarkson University; 55 students are non-resident aliens at SUNY Canton; and 23 students are non-resident aliens at SUNY Potsdam. The County assumes non-resident aliens represent LEP persons who may not have the financial resources to purchase and operate a personal vehicle, and therefore rely on public transportation daily.

2024-2025	Total	Undergraduate	White	Latino	Black	Asian	Native	Hawaiian/ Pacific	Two or More	Unknown	Non-Resident Alien
Clarkson	3,348	2,296	1,665	292	57	53	5	-	78	9	140
St. Lawrence	1,991	1,949	1,460	107	49	33	10	2	41	41	210
SUNY Canton	3,459	3,459	1,878	332	291	76	52	3	100	671	55
SUNY Potsdam	2,832	2,111	1,288	213	133	30	32	2	46	327	23
Total	11,630	9,815	6,291	944	530	192	99	7	265	1,048	428
Percent		84%	64%	10%	5%	2%	1%	0.1%	3%	11%	4%
Note: Data for Wanakena Ranger School not available											
Source: https://nces.ed.gov/globallocator/											

4. The resources available to St. Lawrence County, and overall cost to provide LEP assistance

Adult Protective Services, Child Protective Services, the Public Health Department, the Department of Motor Vehicles and County Sheriff's deputies who assist or render aid to LEP persons rely on interpreter services that are provided: By phone; in person by paid interpreters; or from bilingual US Border Patrol officers. The Department of Social Services reports the cost to arrange interpreter services by phone for Adult Protective Services, Child Protective Services and for the Public Health Department in 2025 was $458.86. The County DMV receives complimentary access to a State DMV language assistance phone line. The County Sheriff

receives complimentary access to a language assistance phone line from the State Court system, and in 2025 paid $2,043.25 for hired interpreters. The County did not pay for interpreter services provided by Border Patrol officers.

TRANSLATION OF DOCUMENTS

St. Lawrence County weighed the cost and benefits of translating documents for LEP persons. Based on the size of the County's LEP population, the expense of translating documents, the likelihood of document revisions, and zero prior requests for the written translation assistance, St. Lawrence County does not translate its documents in advance.

In instances when a project is expected to impact LEP individuals, St. Lawrence County staff will:

- Provide meeting notices, flyers, and agendas in appropriate non-English language(s).
- Include a statement on agendas and public notices in appropriate non-English language(s) about the availability of translated documents upon request.
- Prepare and post press releases about public meetings in non-English languages as necessary.
- Distribute copies of press releases to advocacy groups and other organizations serving LEP populations.

MEASURES TO PROVIDE 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 St. Lawrence County's services. St. Lawrence County's staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English. Language assistance can include interpretation (oral or spoken transfer of a message from one language into another language) and translation (written transfer of a message from one language into another language).

The County and its contractors can help an LEP person identify the language assistance that is needed by downloading an "I speak" translation flyer from:
https://www.lep.gov/sites/lep/files/media/document/2022-06/i-speak-booklet.pdf

Once a specific language is identified, the County can pursue one of the following options:

- Arrange interpretation services through a language assistance phone line.
- Arrange for voluntary or paid language interpretation services by phone or in person.
- Arrange for voluntary or paid video conferencing translation services.
- Coordinate with area universities to arrange interpretation or translation services (SUNY Canton, SUNY Potsdam, Clarkson University, St. Lawrence University and SUNY ESF Wanakena Ranger School) if an LEP person is enrolled at their university.
- Utilize a language translation website.

DISSEMINATION OF THE LEP PLAN

St. Lawrence County will disseminate its LEP Plan by:

- Posting signs in County facilities informing LEP persons of the County's LEP Plan and procedures to access language services.
- Posting the LEP Plan and procedures to access language services on its website.

MONITORING AND UPDATING THE LEP PLAN

St. Lawrence County will update its LEP Plan as required. At a minimum, the plan will be reviewed and evaluated for updates when: New LEP population estimates are released by the US Census Bureau or the NYS Office of General Services, or when County departments report increased interactions with LEP persons and current language assistance options no longer suffice. Monitoring and updating the County's LEP Plan will include reviewing:

- New estimates of LEP populations in the service area based on statistical data; surveys; information from community-based organizations; or other sources.
- Periodically surveying staff regarding their interactions with LEP persons over a specified time period (e.g., quarterly, semi-annually, and annually).
- Reviewing how language assistance services were provided and whether they were sufficient.
- Determining the adequacy of St. Lawrence County's financial resources to fund language assistance resources.
- Determining the County's full compliance with the goals of its LEP Plan.
- Reviewing the County's processing of LEP complaints.

Attachment 7

Nondiscrimination Authorities

FEDERAL LAWS

• Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.,* 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.

• The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);

• Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.),* (prohibits discrimination on the basis of sex);

• Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.),* as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;

• The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.),* (prohibits discrimination on the basis of age);

• Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);

• The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);

• Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.P.R. parts 37 and 38;

• The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);

• Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;

• Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);

• Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

NEW YORK STATE LAWS

New York State Human Rights Law Article 15 (1945) – Guarantees nondiscrimination in the State of New York on the basis or race, creed, color, national origin, sex, marital status, age, disability and or sexual orientation.

New York State Law Article 15-A (1988) – An act to amend the executive law and state Finance law, in relation to participation by minority group members and women with respect to state contracts.

New York State Law Article 17-B (2014) – An Act to amend the executive law, in relation to expanding opportunities for service-disabled veteran-owned business enterprises.

Sexual Orientation Nondiscrimination Act (2003) – This Act amends the Executive Law to include sexual orientation.

NEW YORK STATE EXECUTIVE ORDERS

On January 1, 2011, Governor Cuomo issued Executive Order 2 that authorized the continuation of certain prior Executive Orders related to equal opportunity and nondiscrimination in all State programs.

Executive Order No. 6 (Governor Cuomo, 1983) – Insures equal employment opportunities for minorities, women, disabled persons and Vietnam Era Veterans in State government. The order clarifies and expands the power of the President of the Civil Service Commission and the Governor's Executive Committee for Affirmative Action to ensure that agencies develop and implement effective action plans.



St. Lawrence County
Title VI Plan
for Public Transit Operations

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

St. Lawrence County Public Transit operates 15 routes that primarily service the northern and western portions of the county where the five population centers are located and in the more densely populated portion of the county.

With the exception of Routes 67, 68 and 69 which provide daily service to and from SUNY Potsdam, Clarkson University, and SUNY Canton from August to May, most routes operate year-round, Mondays to Fridays for extended business hours. A listing of the communities served by each route can be found on the St. Lawrence County Public Transit website at https://www.slcnypublictransit.com/transit-schedules.

In addition to bus service, St. Lawrence County Public Transit riders can utilize "First Mile Last Mile" which acts as a vital connector service for public transit riders, ensuring they can easily access a bus stop regardless of their location. Given the county's large geographic size and dispersed population across five population centers, First Mile Last Mile effectively addresses a significant barrier to accessing public transit.

B. St. Lawrence County TITLE VI PLAN FOR PUBLIC TRANSIT OPERATIONS

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5311 funds, St. Lawrence County's Title VI Plan for Public Transit Operations 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

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

B1. St. Lawrence County TITLE VI Policy

St. Lawrence County 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 St. Lawrence County and NYSDOT and third-party contractors.

For more information on St. Lawrence County's Title VI program contact:

Title VI Coordinator
St. Lawrence County
Planning Director
48 Court Street
Canton, NY 13617
Phone (315) 379-2292
planning@stlawco.gov

B2. Title VI Public Notice

St. Lawrence County's Notice to the Public is posted in the following locations:

- ☒ Agency website at: https://stlawco.gov/Departments/HumanResources
- ☒ Public areas of the agency office (County Courthouse, 48 Court Street, Canton; Department of Social Services, 6 Judson Street, Canton; and County Human Services Center, 80 State Highway 310)
- ☐ Inside transit vehicles

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

Notice to Beneficiaries: Protection Under Title VI

- St. Lawrence County operates its programs and services without regard to color, race or national origin in accordance with Title VI of the Civil Rights Act of 1964. St. Lawrence County also operates it programs and services to accommodate persons with disabilities under the Americans with Disabilities Act of 1990. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the County Planning Director.

- For more information on St. Lawrence County's Title VI Plan, and the procedures to file a complaint, visit:

  https://stlawco.gov/Departments/HumanResources

  Persons may also contact:

  Title VI Coordinator: Planning Director
  Mailing Address: 48 Court Street, Canton, NY 13617
  Phone: (315) 379-2292
  Email: planning@stlawco.gov

- A complaint may be filed directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE Washington DC 20590

- If information is needed in another language, the County can arrange to obtain written and verbal translation services for beneficiaries upon request.

- Si necesita información en otra idioma, por favor contacto (315) 379-2292.

B3. Title VI Complaint Procedures and Complaint Form

St. Lawrence County's Title VI Complaint Procedure is available in the following locations:

- ☒ Agency website at: https://stlawco.gov/Departments/HumanResources
- ☒ Hard copy in the Planning Office
- ☐ In client intake materials
- ☐ Other

Anyone who believes they have been discriminated against on the basis of race, color, or national origin, may file a complaint by completing and submitting the Title VI Complaint Form (contained in *Appendix B*) to the address below.

St. Lawrence County
Title VI Coordinator: Planning Director
48 Court Street
Canton, NY 13617
Phone (315) 379-2292
planning@stlawco.gov

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

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

1. Acknowledge receipt of the complaint within 10 days (*Appendix C*)
2. Determine if St. Lawrence County has jurisdiction to investigate the complaint.
3. Plan to complete the investigation within 45 days.
4. Schedule an interview, if deemed necessary.
5. Determine if other public or private entities are or should be involved.
6. Determine if additional information is needed. Complainant has 15 days to provide the additional information.
7. If St. Lawrence County is not contacted by the complainant or does not receive the additional information within 15 days, the case can be administratively closed. Additionally, a case can be administratively closed if the complainant no longer wishes to pursue the case.
8. Determine if meetings with the affected party or other interested parties are needed.

After the investigative process has been completed, the St. Lawrence County will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF).

1. A **closure letter** summarizing the allegations and stating that there was no Title VI violation and that the case will be closed. (*Appendix 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 St. Lawrence County 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 St. Lawrence County at (315) 379-2202.

Si se necesita informacion en otro idioma por favor contacto, (315) 379-2292.

B4. Transit Related Title VI Complaints, Investigations and Lawsuits

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

2019 to 2021:

2019: 0

2020: 0

2021: 0

2022 to 2023:

2022: 0

2023: 0

Check One:

X There have been no investigations, complaints and/or lawsuits filed against St. Lawrence County during the reporting period.

There have been investigations, complaints and/or lawsuits filed against St. Lawrence County. *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

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

Effective public involvement is a key element to involving the public in St. Lawrence County's transit service decision making process. This Public Involvement Process describes how St. Lawrence County 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 St. Lawrence County's decision-making process, St. Lawrence County 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, St. Lawrence County buildings, and on the St. Lawrence County website.
2. Public meetings will be conducted at times, locations, and facilities that are convenient and accessible.
3. Meeting materials will be available in a variety of predetermined formats and language(s) to serve diverse audiences.
4. Provide professional interpreters in the language(s) spoken by the targeted LEP population(s).

Summary on Public Involvement Activity

Since the last Title VI plan update, St. Lawrence County conducted the following public involvement outreach (emails, website posting, media outlets, in-person, virtual) sessions:

Event Name	Date (Month, Day, Year)	Brief Description of Event Purpose	Outcome Methods	Summary of Attendance
Public Transit Task Force Meetings (virtual and in person)	Five times per year: Sept, Nov, Dec, Mar & May	Provide ridership, schedule, route, travel training, and capital investment updates to stakeholder agencies and to receive feedback on concerns/complaints	Improved direct communication with passengers and stakeholder agencies who assist members of the riding public, and opportunity to improve service with added bus stops, route and/or schedule changes	Meetings are five times per year, with 12 to 20 persons regularly attending.
County webpage inviting the public to submit emails	Continuous	Gives the riding public or agency representatives to submit emails with requests for travel assistance or to file complaints	Response email outlining how request or complaint will be addressed either by dispatch staff or Mobility Manager	1 or 2 emails per month.
Public Transit social media posts	Weekly	Announce: route and schedule changes; service availability; new bus wraps with partnering agencies and advertisers; and weather related delays and cancellations	Increased public awareness about service availability	30,129 unique visits to website, and outreach to 78,843 accounts via Facebook in 2023.
Press Releases and legal notices to local media and posting on public transit website	As needed	Announce: public hearing for Coordinated Transportation Plan, ribbon cuttings for new bus shelters; routes serving area farmers markets; achieving new ridership records; recognizing transit drivers; weather-related delays and cancellations	News articles and announcements in local media; legal notice postings; and attendance to events	19 persons attended the March 2024 public hearing for the Coordinated Transportation Plan. Attendance to bus shelter ribbon cuttings: 15 at Potsdam Roxy; 14 at Munson Street; 10 officials at Social Services; and 13 in Madrid. Articles published and news reports on 04/03/24 on North Country This Week: Passio Go! now available 04/04/24 on Channel 7 News: Public Transit delays due to solar eclipse 05/16/24 on NCPR Passio Go! and FMLM featured 06/11/24 on North Country This Week on Madrid bus shelter ribbon cutting

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, St. Lawrence County will take reasonable steps to ensure meaningful access to our programs and activities by LEP persons. St. Lawrence County's Language Assistance Plan considers the following factors:

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

LEP Four Factor Analysis

To determine what the specific languages are spoken in our transit service area and to determine what language services are appropriate for the LEP population, the St. Lawrence County 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 St. Lawrence County 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.

According to US Census Bureau's American Community Survey 5-Year estimates, there are no significant numbers of LEP populations in excess of 1,000 in St. Lawrence County. The 2015 American Community Survey 5-Year Estimates for St. Lawrence County - the most recent data available for Limited English Proficiency [LEP] populations - indicates there are no language groups with more than 1,000 people who speak English less than "very well." Due to the county's small population size, the margins of error for some language groups in the county is equal to, or greater than the estimate.

[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 St. Lawrence County

The County assumes the greatest frequency LEP Persons may come into contact with Public Transit is through routes 67, 68 and 69 which service SUNY Potsdam, Clarkson University and SUNY Canton campuses. 2022-2023 enrollment data for these universities indicate approximately 22 students are non-resident aliens at SUNY Potsdam; 175 students are non-resident aliens at Clarkson University; and 57 students are non-resident aliens at SUNY Canton. The County assumes non-resident aliens may represent LEP populations, may not have the financial resources to purchase and operate a vehicle while attending school, and therefore rely on public transportation daily.

2022-2023	Total	Undergraduate	Men	Women	White	Latino	Black	Asian	Native	Hawaiian/ Pacific	Two or More	Unknown	Non-Resident Alien
Clarkson	3,719	2,668	2559	1160	2923	234	119	112	11	N/A	123	22	175
St. Lawrence	2,175	2,145	996	1179	1646	133	57	46	9	2	46	24	218
SUNY Canton	2,836	2,836	1231	1605	1906	286	312	71	40	0	79	82	57
SUNY Potsdam	2,427	2,082	949	1480	1752	248	187	41	36	2	80	61	22
Total	11,157	9,731	5,735	5,425	8,228	901	674	269	96	5	328	189	471
Percent		87%	51%	49%	74%	8%	6%	2%	1%	0.04%	3%	2%	4%
Note: Data for Wanakena Ranger School was not available													

Source: https://nces.ed.gov/globallocator/

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

The nature of the service provided by Public Transit is significant as it helps persons who do not use their own transportation to reach a destination. Since the last Title VI plan update, St. Lawrence County has not received requests to provide assistance in another language.

Factor 4 Resources and Costs | Resources available

The following resources are available to provide language assistance to Limited English Proficiency populations in St. Lawrence County: Requesting translation assistance from area universities if an LEP person is enrolled at their university; the use of mobile phone translation apps; seeking assistance from volunteer residents who are fluent in a foreign language; video conferencing translation services; and telephone translation services. When providing citizen participation opportunities to LEP persons, or when approached for assistance by LEP persons, the County and its contractors can help an LEP person identify the language assistance that is needed by downloading an “I speak” translation flyer from: https://www.lep.gov/sites/lep/files/media/document/2022-06/i-speak-booklet.pdf

Implementing the Language Assistance Plan

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

B7. Minority Representation on Advisory Boards

The only non-elected transit committee or council of St. Lawrence County Public Transit is the Public Transit Task Force. The representation of membership by racial breakdown is shown in the table below.

Racial Composition of Membership of Board, Committees, Councils

Presently four organizations are represented by persons of color who regularly attend Public Transit Task Force meetings. They include the St. Lawrence County Planning Office; Mohawk Indian Housing Corporation; St. Regis Tribe Office for the Aging; and SUNY Canton. Approximately 12 to 20 persons consistently attend Public Transit Task Force meetings. The calculated racial composition of the Task Force is based on 20 persons in attendance.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
SLC Public Transit Task Force	84%	0%	1%	0%	15%	Unknown

Efforts to Encourage Minority Representation on Boards and Committees

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

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

The outreach efforts the County, its bus operator, and Mobility Manager use to encourage minority participation in Public Transit Task Force meetings include: Travel training presentations to stakeholder agencies and their clientele (e.g. Office for the Aging; Seaway Valley Recovery; housing authorities; and area colleges); agency outreach through in-person meetings and phone calls; social media posts; legal notices and press releases; and meeting announcements on Public Transit's website.

B8. Recordkeeping and Reporting

St. Lawrence County 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.

St. Lawrence County 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. St. Lawrence County will review its Title VI Plan at least once every

three years to determine if modifications are necessary. The St. Lawrence County subcontracts the operation of (some or all) 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**
December 31, 2024	Adopted plan updated and distributed	Title VI Coordinator and Department Heads	Verified intake materials, postings. Verified all employees received Title VI training and copies of Title VI policy.
December 31, 2025	Annual review of implementation	Title VI Coordinator and Human Resources Director	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
December 31, 2026	Annual review of implementation	Title VI Coordinator and Human Resources Director	Verified all new employees received training and copies of Title VI policy. Verified intake materials and postings.
December 31, 2027	Annual review of implementation	Title VI Coordinator and Human Resources Director	Verified all new employees received training and copies of Title VI policy. Verified intake materials, postings

Program Monitoring

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

Did St. Lawrence County construct, expand or acquired a facility in the past three years?

☒ **No**. St. Lawrence County has not constructed, expanded or acquired a facility.

☐ **Yes**. St. Lawrence County did (construct, expand, acquire) a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives.

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

☐ **No**. St. Lawrence County does not plan to construct, expand or acquire a facility.

☒ **Yes**. St. Lawrence County plans to construct 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?

In summer 2024, the DOT awarded funds to St. Lawrence County to hire an Architectural and Engineering firm to prepare a scope of work and cost estimate to either construct a new, or acquire an existing and expand a bus garage and public transportation office. A fully executed award contract is pending. A RFQ for services will be released by the end of 2024 or the beginning of 2025. The selected A&E firm will conduct the equity analysis on the County's behalf.

C. Requirements for Fixed Route Transit Providers

C1. Service Standards (Quantitative Measures)

Vehicle Load Standard

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 28 passengers for a Lot K bus, and 16 passengers for a Lot G bus. In 2023, Route 68 had the highest trip annual count in the system of 39,818 trips. The route operated 3,817.4 hours that year, and averaged 10 trips per hour, indicating the Lot K bus assigned to this route is large enough to accommodate its ridership.

Vehicle Headway Standard

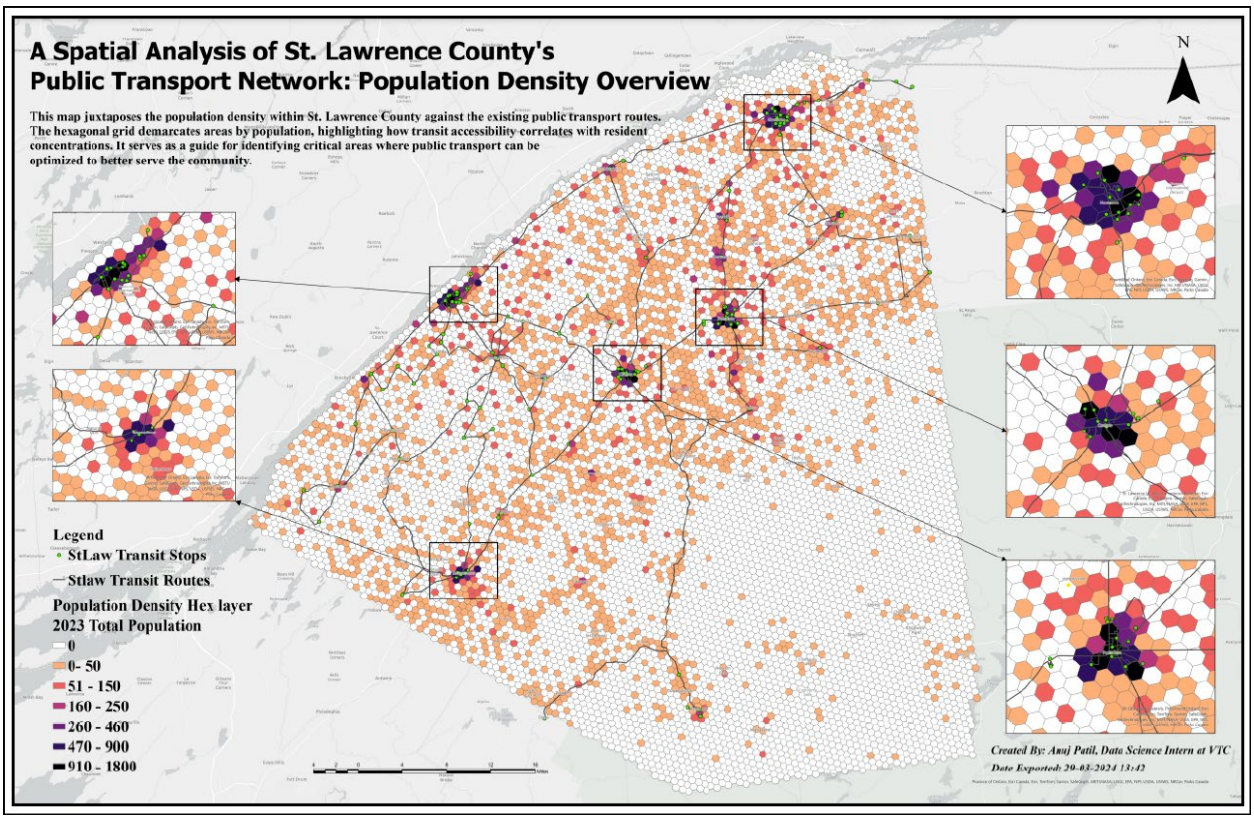
Presently St. Lawrence County Public Transit operates 15 routes which are primarily located in the St. Lawrence River Valley where it is more densely populated with its five population centers. None of St. Lawrence County Public Transit's bus routes are serviced by more than one bus at a time.

On Time Performance Standard

St. Lawrence County Public Transit buses are considered on time if it departs a scheduled timepoint no more than 0 minutes early and no more than 5 minutes late. In 2023 the County acquired a GPS and Automatic Vehicle Location (AVL) software system for its bus fleet from Passio Go! The system's General Transit Feed Specification (GTFS) is undergoing final configurations for uploading to Google Maps, and the County and its operator will soon have the ability to pull reports from the program to evaluate on time performance. Because the system is new and the GTFS configuration will likely require revision to ensure it is accurate, St. Lawrence County Public Transit's preliminary on-time performance objective is 50% percent or greater. Once the GTFS configurations are finalized, St. Lawrence County Public Transit will continuously monitors on time performance, and system results will be published and posted.

Service Availability Standard

St. Lawrence County's bus routes are distributed between the five population centers in the St. Lawrence River Valley, and is within ¼ mile walking distance to 47% percent of the County total population. The following map was included in the County's 2024 Coordinated Transportation Plan to demonstrate the distribution of existing routes in relation to population density.



In areas where a bus stop is not within walking distance, the County offers “First Mile Last Mile” which connects passengers to Public Transit. Trips are scheduled 48 hours in advance where a volunteer driver will transport passengers to and from a bus stop that connects them to their final destination.

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. St. Lawrence County service policies are:

Transit Amenities Policy

In locations where covered shelter is not available, St. Lawrence County applies for funds to purchase bus shelters that are installed and maintained by a host municipality or organization. To date, bus shelters were installed at: Department of Socials Services (Judson Street), Canton; Munson Street, Potsdam; Roxy Theater (Main Street), Potsdam; Community Center (Beech Street), Massena; Housing Authority (Robinson Road), Massena; and Hepburn Library (Church Street), Madrid. Trash receptacles are also installed next to a shelter if one is not already present.

Vehicle Assignment Policy

The County’s owns both 18-passenger (Lot G) vehicles and 28-passenger (Lot K) vehicles for Public Transit operations. Vehicle assignments take into account the operating characteristics of vehicles, which are matched to the operating characteristics of the route, trip purpose of passengers, and volume of ridership along a given route. Based on trip counts, Lot G buses serve routes 31, 62, 63, 65, 66, 71, 73 and 74; Lot K buses serve routes 12, 61, 67, 68, 69, 70A and 70B. As vehicles approach the end of their userful life, they are assigned as spares or are auctioned by the County as scrap once a vehicle manufacturer delivers replacement buses.

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

November 2, 2020

Finance Committee: 10-26-2020

RESOLUTION NO. 309-2020

ADOPTING AN AMENDED ST. LAWRENCE COUNTY TITLE VI PLAN AND AUTHORIZING THE CHAIR TO SIGN THE PLAN

By Mr. Acres, Chair, Finance Committee

WHEREAS, Resolution No. 254-2016, authorized the Board of Legislators to adopt a Title VI Plan, and

WHEREAS, in accordance with Title VI of the Civil Rights Act of 1964, the St. Lawrence County Title VI Program Plan was drafted to reaffirm the policy of the County to allow all individuals the opportunity to participate in federal financially assisted services, and

WHEREAS, as a recipient of federal and state funds, St. Lawrence County is subject to the requirements and provisions of Title VI of the Civil Rights Act of 1964, as amended, and

WHEREAS, the provisions include, but are not limited to, prohibiting discrimination on the grounds of race, color or national origin (being denied the benefits of, or otherwise subjected to discrimination under any program or activity administered by federal or state assisted programs, services, or activities), and

WHEREAS, St. Lawrence County is currently working with the New York State Department of Transportation Office of Civil Rights to ensure compliance with Federal Highway Administration requirements related to Title VI and non-compliance can affect federal financial assistance, and

WHEREAS, St. Lawrence County assures every effort will be made to guarantee nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not, and every effort will be made to ensure that no person is excluded from participation in or denied benefits of its services based on race, color, or national origin,

NOW, THEREFORE, BE IT RESOVLVED that the Board of Legislators adopts the amended Title VI Plan and authorizes the Chair to sign the Plan, upon approval of the County Attorney, and

BE IT FURTHER RESOLVED that the Board of Legislators appoints the Director of Planning as the Title VI Coordinator, and

BE IT FURTHER RESOLVED that the Plan will be housed within the St. Lawrence County Planning Department and available for review.

November 2, 2020

STATE OF NEW YORK)
) **ss:**
COUNTY OF ST. LAWRENCE)

I, Kelly S. Pearson, Deputy Clerk of the St. Lawrence County Board of Legislators, **DO HEREBY CERTIFY** that I have compared this Resolution No. 309-2020 Entitled "Adopting an Amended St. Lawrence County Title VI Plan and Authorizing the Chair to Sign the Plan", adopted November 2, 2020, with the original record in this office and that the same is a correct transcript thereof and of the whole of said original record.

Kelly S. Pearson
Kelly S. Pearson, Deputy Clerk
St. Lawrence County Board of Legislators
November 3, 2020

APPENDIX B: Title VI Complaint Form

St. Lawrence County Title VI 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**

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.

St. Lawrence County
Planning Director: Title VI Coordinator
48 Court Street
Canton, NY 13617
planning@stlawco.gov

This complaint may also be filed directly with the New York State Department of Transportation, Office of Civil Rights, 50 Wolf Road, 6th Floor, Albany, NY 12232, (518) 457-1129 Fax (518) 549-1273, OCR-TitleVI@dot.ny.gov or the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

APPENDIX 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 St. Lawrence County alleging _____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by contacting our office at (315) 379-2292 or in writing to St. Lawrence County, 48 Court Street, Canton, NY 13617 or email planning@stlawco.gov.

Sincerely,

St. Lawrence County Planning Director
Title VI Coordinator
48 Court Street
Canton, NY 13617
(315) 379-2292
planning@stlawco.gov

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 St. Lawrence County alleging _____ has been investigated. The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

St. Lawrence County has analyzed the materials and facts pertaining to your case. There was no evidence identified that a violation of your Title VI rights were denied. I therefore advise you that your complaint was not substantiated and that I am closing the matter in our files.

You have the right to 1) provide additional information to this office for reconsideration of your complaint within seven (7) calendar days of receipt of this final written decision and/or 2) file a complaint externally with the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor- TCR 1200 New Jersey Ave., SE Washington DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Planning Director
Title VI Coordinator
48 Court Street
Canton, NY 13617
(315) 379-2292
planning@stlawco.gov

APPENDIX E: Title VI Complaint Letter of Finding

Date

Name

Address

City, State Zip

Dear Name:

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

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

Sincerely,

Planning Director
Title VI Coordinator
48 Court Street
Canton, NY 13617
(315) 379-2292
planning@stlawco.gov

APPENDIX F: Title VI Notice to the Public

Notifying the Public of Rights under Title VI

St. Lawrence County

St. Lawrence County operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **St. Lawrence County.**

For more information on **St. Lawrence County's** Title VI Plan, and the obligations and procedures to file a complaint, contact (315) 379-2292; email planning@stlawco.gov; or visit the Planning Office at **St. Lawrence County**, 48 Court Street, Canton, NY 13617. For more information on how to contact St. Lawrence County to find out about Title VI, visit https://stlawco.gov/Departments/HumanResources.

A complainant may file a complaint directly with **St. Lawrence County** Title VI Coordinator by following the **St. Lawrence County** complaint procedures also found on the agency's website. A complaint can also be filed with the New York State Department of Transportation on its Civil Rights website at https://www.dot.ny.gov/main/business-center/civil-rights/title-vi-ej. Finally, a complaint can be filed directly with the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact (315) 379-2292.

Si necesita información en otra idioma, por favor contacto (315) 379-2292.