

Item Number	Agency Compliance Item	Page(s)
1.	Public Notice to Beneficiaries	2
2.	Information Dissemination, Subcontractors, Records	3
3.	Complaint Procedures	4
4.	Complaint Form	5-8
5.	Complete List of Title VI Investigations, Lawsuits, and Complaints [Template]	9
6.	Participation and Outreach Process	10-11
7.	Language Assistance Plan	12
8.	Safe Harbor Provision	13
9.	Membership of Non-elected Committees and Councils	14-15
10.	Equity Analysis Statement	16
11.	Plan Approval – Board Meeting Minutes	17-19
12.	Appendix A – Attestation Form	20

The Rural Health Network of SCNY, Inc. is committed to providing nondiscriminatory service to ensure that no person is excluded from participation in, denied the benefits of, or be subjected to discrimination in the receipt of its services on the basis of race, color, national origin, or disability as protected by Title VI of the Civil Rights Act of 1964 ("Title VI") and the Americans with Disabilities Act ("ADA").

To request additional information about Title VI, ADA, a translation of related obligations or procedures, or if you believe you were subject to discrimination and would like to submit a written complaint, you may contact:

Cindy Martin  
Resource Development Director  
Rural Health Network of South Central New York  
455 Court Street  
Binghamton, NY 13904  
Phone: [607-692-7669](tel:607-692-7669)  
Fax: [607-692-7670](tel:607-692-7670)

I. Dissemination

The Civil Rights statement or informational posters shall be prominently and publicly displayed on Getthere's website (gettherescny.org) and in the Rural Health Network of SCNY (RHN) office. Additional information relating to non-discrimination obligations can be obtained from RHN's Title VI Coordinator.

The Title VI/ADA Plan shall be disseminated electronically to all new RHN employees, service program members, volunteers, et al. and added to the RHN personnel policy containing the language set forth in Section II. To those performing work on behalf of RHN, this will serve as a reminder of the Civil Rights statement and of their associated responsibilities in daily work and duties.

During orientation, new employees, service program members, volunteers, et al. shall be informed of the provisions of Title VI, ADA, and the expectation to perform their duties accordingly. All working on behalf of RHN shall be provided electronic access to the Title VI/ADA Plan and are required to sign the Attestation Form (included).

II. Civil Rights Statement Language

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

*All those working on behalf of RHN are expected to consider, respect, and observe this policy in their daily work and duties. If a participant or family member approaches you with a question or complaint relating to Title VI of the Civil Rights Act of 1964 ("Title VI"), the Americans with Disabilities Act of 1990 ("ADA"), or discrimination of any kind based on race, color, national origin, or disability, direct them to the Title VI Coordinator.*

III. Subcontractors

All subcontractors and vendors who receive payments from RHN where funding originates from any Federal assistance are subject to provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Records

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgments from staff and other workers indicating the receipt of the RHN Title VI/ADA Plan, copies of the Title VI/ADA complaints or lawsuits and related documentation, and records of correspondence to and from complainants and Title VI/ADA investigations.

## **Complaint Procedures**

Any person who believes she or he has been discriminated against on the basis of race, color, national origin, or disability by Getthere/Rural Health Network of South Central New York (hereinafter referred to as "RHN") may file a Title VI or ADA complaint by completing and submitting the agency's Title VI - ADA Complaint Form, which may be completed online, downloaded from the Getthere or RHN website, or received via mail by contacting:

Cindy Martin, Resource Development Director  
Rural Health Network of SCNY  
455 Court St.  
Binghamton, NY 13904  
607-692-7669  
cmartin@rhnsctny.org

RHN investigates complaints received no more than 180 days after the alleged incident. RHN will process complaints that are complete.

Once the complaint is received, RHN will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing them whether the complaint will be investigated by our office.

RHN has 30 days to investigate the complaint. If more information is needed to resolve the case, RHN may contact the person submitting the complaint (the complainant). The complainant has 20 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 20 business days, RHN can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI or ADA violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, they have 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration at:

Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

The Title VI - ADA Complaint Procedures content will be translated into languages other than English, or furnished in accessible materials, as requested.

Please complete the following form. Note that the contact information requested should be for the person who believes they were discriminated against. Additionally, if you are completing the form on behalf of another party, you must have that party's permission to do so.

\* Indicates required question

1. Name: \*

---

2. Mailing Address: \*

---

3. Phone: \*

---

4. Email:

---

5. Do you require an accessible format? \*

*Check all that apply.*

Yes

No

6. If yes, describe format required:

---

### Nature of Complaint

Please supply the following information to the best of your ability

7. For what reason do you believe you were discriminated against? \*

*Check all that apply.*

- Race
- National Origin
- Color
- Disability
- Other:

---

8. If other, please describe reason:

---

9. Date of Alleged Discrimination: \*

---

*Example: January 7, 2019*

10. Please explain why you believe you were discriminated against. If possible, list the name(s) or position of the person/persons who discriminated against you. If unknown, please describe them. List the names and contact information of any witnesses, if available. Any details provided will be useful to the investigators. \*

---

---

---

---

### Additional Complaints Filed

If you have already led this complaint with another office, agency, or court, please provide the information requested below:

11. To what agency/court was the complaint submitted?

*Check all that apply.*

- Federal Agency
- Federal Court
- State Agency
- State Court Local
- Agency Other:
- \_\_\_\_\_

12. Please provide the name and contact information for the court/agency representative to whom the complaint was submitted:

---

---

---

---

---

---

13. If you have already filed this complaint with another office or offices, please indicate which below:

*Check all that apply.*

---

- Federal Agency
- Federal Court
- State Agency
- State Court Local
- Agency Other:
- \_\_\_\_\_

**Discriminatory Party**

Please provide the following information about the agency against whom you are ling this complaint:

14. Name of Agency: \*

15. Name and Title of Contact Person:

\_\_\_\_\_

16. Phone:

\_\_\_\_\_

17. Email:

\_\_\_\_\_

**Complete List of Title VI and ADA Investigations, Lawsuits, and Complaints**

<b>Investigation, Lawsuit, Complaint</b>	<b>Date</b>	<b>Identified Reason</b>	<b>Status</b>	<b>Actions Taken</b>

Per Federal Transit Administration (FTA) Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* (October 1, 2012), all direct and primary recipients must document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

As recipients of Enhanced Mobility for Seniors and Individuals with Disabilities (FTA Section 5310) and Non Urbanized Area Formula (FTA Section 5311) funding, and as part of the Title VI Program, Rural Health Network is required to conduct public outreach through a variety of efforts to ensure access for low-income, minority, and limited English proficiency (LEP) populations.

Examples of past outreach efforts at the Rural Health Network of South Central New York include:

- Presentations to organizations, government service providers, and health care providers that serve seniors and individuals with disabilities
- Targeted mailings to households with persons 60+ in communities served by Rural Health Network
- Emails to a database of over 2,600 contacts through Constant Contact
- Press releases and articles through newspapers not limited to, but including the following: Press and Sun-Bulletin (Binghamton), Evening Sun (Norwich), Daily Star (Oneonta), Reporter (Delhi), and Owego Pennysaver (Owego)
- Bi-monthly mobility management e-newsletter, *The Milepost*, delivered to over 575 contacts
- Monthly Rural Health Network e-newsletter, *Rural Matters*, delivered to over 600 contacts
- Regularly updated websites [www.rhnsny.org](http://www.rhnsny.org) and [www.gettherescny.org](http://www.gettherescny.org)
- Radio advertisements through local radio including WSKG, WCDO, and WEBO
- Mailing of print copies of the Getthere mobility management annual Progress Report or RHN Impact Report to key stakeholders and partners
- Marketing of Getthere Call Center services through print, radio, internet and television media to reach the transportation disadvantaged population.

Getthere maintains a robust marketing, outreach, and education plan as part of its 5310 and 5311 mobility management programming. This entails reaching out to transportation-disadvantaged communities, including seniors, individuals with disabilities, minorities, and the rurally isolated. As a core component of this work, it participates in tabling events throughout the calendar year to more frequently interact with these groups. It has additionally cultivated

extensive relationships with partner organizations and other stakeholders to one, ensure it is adequately attuned to all such opportunities, and two, enlist those organizations to help promote its services in an ongoing fashion on Getthere's behalf. Getthere reports many of these events – along with similar presentations and meetings- as well as the dates they were held through NYSDOT's quarterly reporting process.

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP (Limited English Proficiency) persons.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. The Getthere Language Assistance Plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of the DOT LEP guidance.

**1. Identifying LEP (Limited English Proficiency) Individuals**

LEP Individuals are those individuals speaking a language other than English or using sign language that request assistance. Rural Health Network of SCNY (RHN) will learn of such individuals through its operation of the Getthere Call Center and regular interaction with clientele.

**2. Providing Services**

Getthere does not currently have an ongoing need for professional translations services; however, Language Line Telephone Services are available at 866-874-3972, when needed. Additionally, The American Civic Association in Binghamton, NY has provided translation services in the past (they offer Spanish, French, Ukrainian) and can continue to do so, if needed.

**3. Communicating Availability of Language Assistance**

Getthere will inform those who request services of the process for the provision of translation services.

**4. Monitoring**

Getthere utilizes a follow-up survey, which is sent to all service recipients. This offers an opportunity for individuals served or someone on their behalf to provide input or suggest additional services. The Title VI Plan, including the LAP, will also be reviewed every three years.

**5. Employee Training**

As part of the Language Assistance Plan, Getthere staff are instructed what services to use in cases of need; additionally, Getthere encourages staff interest and education in learning to more effectively communicate with individuals served.

The Federal Transit Administration Circular 4702.1B states

*DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered. Then such action will be considered strong evidence of compliance with the recipient's written translation obligation. Translations of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provision apply to the translation of written documents only. The do not affect the requirement to provide access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factors Analysis, that even though a language meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.*

According to the 2021 American Community Survey 1-Year Estimates, roughly 90% (89.53) of the population in Broome County (the most diverse county in our region) speaks only English at home; 1.8% speak Spanish. Only 3.2% of the population reported speaking English "less than very well". Relatedly, of Getthere's roughly 4,000 to 4,500 service recipients per year, and over 20,000 service recipients over the past decade, fewer than five have ever (all years combined) required translation services. As noted in the LAP, the American Civic Association offers a translation service that can assist Getthere with client services in the event that persons with no or limited English proficiency are in need of mobility management assistance. Additionally, in recruiting for staff positions with Getthere mobility management, consideration is given for candidates that are multi-lingual.

<b>Name</b>	<b>Title/Company</b>	<b>Racial/Ethnic County</b>	<b>Term/Elected Year</b>	<b>Areas of Expertise</b>
Lisanne (Lisa) Bobby, President	Advisor, Care Compass Network	Caucasian Broome	Second Term/2020-2022	Healthcare; planning; administration
Rick Boland, Vice- President	Project Manager, United Health Services	Caucasian Broome	Second Term/2021-2023	Healthcare; Population Health
Shelly Bartow, Treasurer	Executive Director, Delaware Opportunities, Inc	Caucasian Chenango	First Term/2020-2022	Anti-Poverty programming
Katherine Young, Secretary	Retired	Caucasian PA	Second Term/2022-2024	Behavioral Health
Kelly Ames	Community Relations Specialist Fidelis Care	Caucasian Otsego	First Term/2020-2022	Health Insurance; Communications
Deborah Blakeney	Senior Director, Continuum of Care Our Lady of Lourdes Hospital	Caucasian Broome	Second Term/2021-2023	Healthcare; nursing; administration
Paula Brown	Community Volunteer	Caucasian Delaware	Second Term/2021-2023	Long Term Care
Natalie Brubaker	Assistant Superintendent of Schools, Susquehanna Valley CSD	Caucasian Broome	First Term/2022-2024	Communications; administration; education; program dev./evaluation
Lynne Esquivel	Project Manager, Broome County Dept. of Mental Health	Caucasian Broome	First Term/2021-2023	Quality Improvement; research; administration; behavioral health
Adam Hughes	State Extension Specialist, Cornell University	Caucasian Tompkins	First Term/2021-2023	Administration; Population Health
Melissa Klinko	Communications Manager Excellus BlueCross BlueShield	Caucasian Broome	First Term/2020-2022	Health Insurance; Communications
Cathleen McLachlan	Registered Dietitian, UHS Delaware Valley Hospital	Caucasian Delaware	First Term/2022-2024	Healthcare
Brendan O'Bryan	Community Development Specialist	Caucasian Broome	First Term/2021-2023	Advocacy; Communications
Tamara Phams	Senior Director, Corporate HIM Guthrie	Black PA	First Term/2022-2024	Healthcare; administration; advocacy; communications; project management
David Reynolds	Respiratory Therapist, Sidney Emerg. Medical Services	Black Delaware	First Term/2022-2024	Healthcare; Diversity Equity Inclusion

<b>Name</b>	<b>Title/Company</b>	<b>Racial/Ethnic County</b>	<b>Term/Elected Year</b>	<b>Areas of Expertise</b>
Josephine Robles	Retired	Caucasian PA	First Term/2020-2022	Healthcare; Social Determinants of Health
Christine Shaver	Director, Program Operations Tioga Opportunities, Inc.	Caucasian Tioga	First Term/2022-2024	Administration; Social Determinants of Health; education
James M. Skiff, MD	Family Physician, UHS Primary Care Newark Valley	Caucasian Tioga	Second Term/2021-2023	Primary Care, Rural Health services
Meghan Staring	Executive Director, Catskill Center for Independence	Caucasian Delaware	First Term/2022-2024	Advocacy; administration

According to FTA Circular 4702.1B, Chapter III, Section 4 [Contents], Subsection a.8, “if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.”

As Getthere has no transit facilities, it has not conducted an Equity Analysis to be included in the Title VI/ADA Plan.

Rural Health Network of South-Central New York, Inc.  
**Board Meeting Minutes**

Date: Thursday, June 15, 2023

Time: 3:00 – 4:30 PM.

Place: Hybrid

Attendees: Rick Boland, President  
Mark Bordeau, Executive Director  
Dee Kline, Finance Director  
Katherine Young, Secretary  
Jaclyn Zindell, Member  
Cathleen McLachlan, Member  
Shelly Bartow, Vice President  
Meghan Staring, Member  
Kristin Johnston, Member  
Christine Petras, Member  
Cindy Martin, Res. Dev. Director  
Lisa Bobby, Member  
Kelly Ames, Member  
Christine Shaver, Member  
Brendan O'Bryan, Treasurer  
Adam Hughes, Governance Chair  
Natalie Brubaker, Member

- I. Welcome & Introductions: R. Boland called the meeting to order.
- II. Review of Potential Conflicts of Interest Relative to Today's Agenda: R. Boland  
None were disclosed.
- III. Minutes of the April 20, 2023 Meeting of the Board of Directors (provided prior to meeting)  
No questions or corrections offered.
- IV. Presentations:
  - a. Cindy Martin-Resource Development Updates: Has been with RHN for 8 years. Addressed how the Board can support fundraising activities with the goal of 100% giving for 2023, especially in light of the organization's 25th year anniversary. A survey will be sent to Board members after the meeting. The celebration will take place Monday, October 16<sup>th</sup> from 5-7pm at the Binghamton Double Tree; cash bar and hors d'oeuvres will be available. Tickets are \$45. A toolkit on how to be RHN ambassadors is forthcoming.
- V. President's Report: R. Boland  
R. Boland encouraged Board members to reach out for a coffee meeting for anything they'd like to talk about.
- VI. Executive Director's Report & Updates: M. Bordeau
  - a. Report submitted before the board meeting

- i. New Items: Reminder that our Impact Report for 2022 is out. We have a YouTube channel with some good information available. We received NYS legislative appropriation for \$100K via NYS Office of Rural Health. We received email from AmeriCorps representatives that some funding is being taken back that will likely impact our RHSC program in 2024. In reviewing and preparing for some federal audits now, it was discovered that we should have completed a federal single audit for 21-22. We are in process of meeting with previous and current auditors to correct this wrong.

VII. Committee Reports:

- a. Executive Committee (Minutes of the May 18, 2023): R. Boland  
Highlighted a potential Board of Directors mixer to make connections with each other.
- b. Audit and Finance Committee (Minutes of May 18, 2023 & May 31, 2023): B. O'Bryan
  - i. FY 2023-2024 Budget Presentation- M. Bordeau & D. Kline:
    - Projected expenses: \$3,337,577
    - Projected revenues: \$3,270,290
    - Projected (and anticipated/planned for) deficit of \$67,287
      - \$45,156- Pending and future grants for Community Health
      - \$22,131- This shortfall covered by general fund dollars.
    - \$1,733,561 in funding applications pending (not budgeted)
    - 50% of projected revenue is from federal sources

Members were reminded that this is a living document as circumstances do change regarding clawing back of or new approval of funding. Does not include capital projects as funders do not allow it-- will address at a later time. AmeriCorps is based on actual enrollment of members. Care Compass Network funding is now more realistic as the projected revenue was previously based on best case scenario.

- For 24-25: We need to: maximize administrative and overhead support; getting to \$0 deficit; have a federal indirect rate in a few years to improve accounting and applying for funding; consider cyclical nature of funding sources; cut down administrative costs; have a mechanism for supporting building maintenance and upgrades
- ii. Finance Director Report- D. Kline: Currently working on federal review of Getthere 5310, 5311 and ARC TEP grants. Also, in beginning stages of our federal single audit—we will meet with our auditor 6/27 to review internal controls and complete a vulnerability assessment.
  - iii. Action Items:
    - Review and Approval of the April 2023 Financial Reports: B. O'Bryan
      - Balance Sheet: *Current Liabilities*-negative amounts from dental, vision and FSA are payments made to our vendor for benefits and later collected from employees; *Net Assets* - On the bottom net assets total is

correct but the splits aren't and will be updated before the end of the fiscal year.

- Statement of Revenues & Expenses: same as on Budget to Date Report
- Budget to Date: We're at 83% of FY; revenues and expenses each at around 64%; planned on deficit of \$239K, we're running at \$152K
- AR Aging Report: continues to be steady—current at \$88K, \$51K is currently outstanding
- Deferred Revenue: is at \$767K, only \$30K is from prior years

**A motion to approve the April 2023 Financial Reports was made by L. Bobby and seconded by C. Petras. All approved, motion carried.**

- Approval of FY 2023-2024 Budget

**A motion to approve the FY 2023-2024 Budget with stipulation that anything with a variance greater than 20% will be brought back to the respective committees for approval was made by K. Young and seconded by R. Boland. All approved, motion carried.**

- c. Governance Committee (Minutes of May 9, 2023): A. Hughes  
Submitted as presented.
- b. Development Committee (Minutes May 4, 2023 & June 1, 2023): C. Shaver  
Submitted as presented.

VIII. Funding Applications: R. Boland

- c. Action: Recommendation to approve the following funding applications:
  - Mee Foundation- Sustainability of CHW Workforce
  - NY Health Foundation- Sustainability of CHW Workforce

**A motion to approve the Mee Foundation application was made by B. O'Bryan and seconded by A. Hughes. All approved, motion carried.**

**A motion to approve the NY Health Foundation application was made by K. Young and seconded by K. Johnston. All approved, motion carried.**

IX. Miscellaneous:

- d. Action Item
  - Review and Approval of Getthere Title VI and ADA plan: Requirement in order to receive FTA funding.

**A motion to approve the Getthere Title VI and ADA plan with updated title and complaint pages was made by M. Staring and seconded by C. Petras. All approved, motion carried.**

X. After-action Reviews (R. Boland)

- e. What went well today: The presentations were really good.
- f. What could be improved: Nothing shared.

Meeting adjourned at 4:17pm.

Minutes respectfully submitted by Melissa Sumpter, Administrative Services Coordinator

I hereby acknowledge receipt of the Rural Health Network of SCNY, Inc. Title VI/ADA Plan. I have read the plan and am committed to ensuring that no participant is excluded from or denied the benefits of its services on the basis of race, color, national origin, or disability as protected by Title VI and the ADA in Federal Transit Administration (FTA) Circular 47002.1.A.

---

Signature

---

Print name

---

Date