HELP ON THE WAY, INC.

HELP ON THE WAY, INC. (HOTW) TITLE VI PLAN

FTA Section 5310

Enhanced Mobility of Seniors and Individuals with Disabilities

Date Adopted: *November 4, 2025*

HELP ON THE WAY, INC.

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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. Help On The Way, Inc. (HOTW) is a subrecipient of FTA financial assistance through a grant from NYSDOT. This Title VI plan details how Help On The Way, Inc. (HOTW) incorporates nondiscrimination policies and practices in providing transit services to the ridership we serve.

Organization Overview

HOTW is a nonprofit organization that receives FTA Section 5310 funding through NYSDOT to provide closed-door transit services exclusively to individuals who are certified by the New York Office for People with Developmental Disabilities (OPWDD). We serve program participants in our Day Habilitation and Supplemental Day programs.

Service Description

Service Type: Closed-door demand response transportation

Service Area: Bronx and Manhattan, New York

Days of Operation: Monday through Saturday

Hours of Operation: 7:00 AM to 8:00 PM

Eligible Riders: OPWDD-certified individuals with developmental disabilities

Average Daily Ridership: 60-75 passengers

Fare: Fare-free service

Administrative Office: 1344 Southern Boulevard, Bronx, NY 10459

HOTW operates a fleet of accessible vehicles to transport program participants to and from our Day Habilitation and Supplemental Day programs, as well as for community integration activities, and social and recreational trips. All transportation services are provided in compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

B. HELP ON THE WAY TITLE VI PLAN

As a subrecipient to NYSDOT receiving Federal Transit Administration Section 5310 funds, Help On The Way (HOTW) Title VI plan shall comply with Title VI of the Civil Rights Act of 1964 as presented with the following elements:

- Title VI Policy Statement
- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures and 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
- Language Assistance Plan for providing language assistance to persons with limited English proficiency
- Board composition table depicting membership broken down by race
- Board approval documentation
- Recordkeeping and reporting procedures

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

B1. TITLE VI POLICY STATEMENT

HOTW is committed to complying with Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that "no person in the United States shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance" (Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.).

This requirement is included in the Section 5310 agreement between HOTW and NYSDOT. HOTW is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of any service or benefit under any program or activity operated by HOTW, regardless of race, color, or national origin, as protected by Title VI.

HOTW also operates its programs and services to accommodate persons with disabilities under the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

For more information on Help On The Way's Title VI program, contact:

Title VI Coordinator: Theiborh Almanzar

Title: CEO & Title VI Coordinator

Help On The Way, Inc.

1344 Southern Boulevard
Bronx, New York 10459
Phone: (718) 484-7810
Email: complaint@hotwny.org

B2. TITLE VI PUBLIC NOTICE

HOTW's Title VI Notice to the Public is prominently posted in the following locations:

- Agency website at: www.hotwny.org
- Public areas of the agency office at 1344 Southern Boulevard, Bronx, NY 10459
- Inside transit vehicles
- Program participant and family materials

A copy of the Title VI Notice is included in Appendix D6. The notice is available in English and Spanish.

B3. TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

Help On The Way, Inc. has established procedures for handling and investigating Title VI complaints. Any person who believes they have been discriminated against on the basis of race, color, or national origin by HOTW may file a Title VI complaint.

How to File a Complaint

A complaint may be filed by completing and submitting the Title VI Complaint Form (see Appendix D2). Complaints may be submitted in the following ways:

- Online via Google Form on our website
- In person at 1344 Southern Boulevard, Bronx, NY 10459
- By mail to the address above
- By email to complaint@hotwny.org
- By phone at (718) 484-7810

Complaints must be filed within 180 days of the alleged discrimination. The complaint should include:

- Complainant's name, address, and contact information
- Name and address of the agency or individual who discriminated
- Description of the alleged discrimination
- Date(s) of the alleged discrimination
- Names and contact information of witnesses, if any

Complaint Investigation Process

Upon receipt of a complaint, HOTW will follow these procedures:

1. **Acknowledgment:** The Title VI Coordinator will acknowledge receipt of the complaint in writing within 10 business days (see Appendix D3 for acknowledgment letter template).
2. **Investigation:** The Title VI Coordinator will investigate the complaint thoroughly, which may include interviewing the complainant, witnesses, and reviewing relevant documentation. The investigation will be completed within 60-90 days of receipt of the complaint.
3. **Determination:** Based on the investigation findings, the Title VI Coordinator will determine whether a Title VI violation occurred.
4. **Response:** The complainant will be notified in writing of the determination and any corrective actions to be taken. If the complaint is substantiated, a Letter of Finding will be issued (see Appendix D5). If the complaint is not substantiated, a Letter of Closure will be issued (see Appendix D4).
5. **Appeal Rights:** The complainant will be informed of their right to appeal to NYSDOT or FTA.

Alternative Filing Options

A complainant 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

Tel.: (518) 457-1129 Fax: (518) 549-1273

OCR-TitleVI@dot.ny.gov

Website: https://www.dot.ny.gov/main/business-center/civil-rights/title-vi-ej

OR

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

B4. TRANSIT RELATED TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS

HOTW maintains a log of all Title VI complaints received. The following is a summary of Title VI complaints, investigations, and lawsuits for the period covering the last three years:

Number of Title VI Complaints Received (Last 3 Years): 0

No Title VI complaints have been filed against HOTW during this reporting period.

Number of Active Investigations: 0

There are no active Title VI investigations involving Help On The Way, Inc.

Number of Title VI Lawsuits: 0

There have been no Title VI lawsuits filed against Help On The Way, Inc.

A detailed complaint log documenting this information is maintained by the Title VI Coordinator and is available upon request from NYSDOT or FTA.

B5. PUBLIC INVOLVEMENT PROCESS

HOTW is committed to ensuring meaningful access to our transportation services and decision-making processes for all individuals, including minority and Limited English Proficiency (LEP) populations. Although we provide closed-door service exclusively to OPWDD-certified individuals, we recognize that our "public" consists of our program participants, their families, caregivers, and guardians.

Definition of Service Type

HOTW provides closed-door transportation service, meaning service is available only to specific eligible individuals (OPWDD-certified program participants) rather than the general public. This is distinct from open-door service, which would be available to any member of the general public who meets basic eligibility criteria.

Public Outreach Methods

HOTW employs the following methods to engage with program participants, families, and caregivers:

- **Surveys:** Annual satisfaction surveys distributed to program participants and families to gather feedback on transportation services, service quality, and needs.
- **Meetings:** Regular meetings with families and caregivers to discuss service changes, address concerns, and gather input on program improvements.
- **Website:** Information about services, policies, and how to provide feedback is available on www.hotwny.org.
- **Direct Communication:** Phone calls and emails to families regarding service changes, schedule modifications, or policy updates.
- **Written Materials:** Distribution of program handbooks, service schedules, and policy updates in English and Spanish.

Engagement of Minority and LEP Populations

To ensure meaningful participation of minority and LEP populations, Help On The Way:

- Provides Title VI information and complaint procedures in English and Spanish

- Maintains bilingual staff members who can communicate with Spanish-speaking families
- Translates vital documents including surveys, notices, and complaint forms into Spanish
- Offers interpretation services during meetings upon request
- Ensures all public notices include a tagline in Spanish indicating how to access information in Spanish

Summary of Recent Outreach Efforts

Since the last Title VI plan submission (or for organizations submitting for the first time, during the past three years), Help On The Way has conducted the following outreach activities:

- Annual satisfaction surveys distributed to all program participant families
- Semi-Annual family meetings to discuss program updates and transportation services
- Individual meetings with families as needed to address specific concerns or service needs
- Distribution of program handbooks and service information in English and Spanish
- Regular communication via phone and email regarding service changes

HOTW will continue to maintain open communication channels with program participants and families, and will document all public involvement activities for future Title VI plan submissions.

B6. LANGUAGE ASSISTANCE PLAN

HOTW is committed to ensuring meaningful access to our programs and services for individuals with Limited English Proficiency (LEP). This Language Assistance Plan (LAP) has been developed in accordance with U.S. Department of Transportation guidance and Title VI requirements.

Four-Factor Analysis

The DOT LEP Guidance requires an individualized assessment using a four-factor analysis to determine the extent of an agency's obligation to provide LEP services. Help On The Way has conducted this analysis as follows:

Factor 1: The Number and Proportion of LEP Persons Served or Likely to Be Encountered

HOTW serves program participants in the Bronx and Manhattan. Based on U.S. Census data and our service experience:

- Primary LEP language: Spanish
- The Bronx has a significant Spanish-speaking population, with approximately 46-54% of households speaking Spanish

- Many of our program participants' families are Spanish-speaking
- We estimate that approximately 40-50% of our riders' families prefer to communicate in Spanish

Factor 2: The Frequency with Which LEP Individuals Come Into Contact with the Program

LEP individuals interact with HOTW services on a frequent basis:

- **Daily contact:** Program participants are transported daily, and families may contact us regarding transportation services, schedule changes, or concerns
- **Regular meetings:** Semi-Annual family meetings and annual reviews
- **Emergency situations:** Families may need to contact us for urgent transportation needs or service disruptions
- **Service enrollment:** New families complete enrollment paperwork and orientations

Factor 3: The Nature and Importance of the Program, Activity, or Service

Transportation services provided by HOTW are critical to program participants:

- **Essential service:** Transportation is necessary for participants to access day habilitation services, which are vital to their health, safety, and quality of life
- **No alternative options:** Many participants have no other means of transportation to access these critical services
- **Safety-critical:** Transportation involves the safety and well-being of vulnerable individuals
- **Legal rights:** Families need to understand their rights under Title VI and how to file complaints if they experience discrimination

Given the critical nature of these services, effective communication with LEP families is essential.

Factor 4: The Resources Available and Costs

HOTW has assessed available resources for providing language assistance:

- **Bilingual staff:** We currently employ bilingual (English/Spanish) staff members who can assist LEP families
- **Document translation:** We have capacity to translate vital documents into Spanish
- **Interpretation services:** We can access telephone interpretation services for languages other than Spanish when needed
- **Technology:** Our website can be equipped with translation features
- **Cost considerations:** Translation and interpretation services are reasonable given our budget and the critical nature of our services

Language Assistance Services Provided

Based on the four-factor analysis, HOTW provides the following language assistance services:

Bilingual Staff

- Bilingual staff members are available during business hours to assist Spanish-speaking families

- Contact: (718) 484-7810 to request Spanish-speaking staff assistance

Translated Vital Documents

The following documents are translated into Spanish:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Program enrollment materials
- Service schedules and changes notices
- Satisfaction surveys

Interpretation Services

- In-person interpretation available for meetings and appointments through bilingual staff
- Telephone interpretation services available for languages other than Spanish through contracted language line services

Outreach and Notice

- All public notices include the following tagline in Spanish:

"Para información en español, por favor llame al (718) 484-7810."

- Website includes information about how to access language assistance
- "I Speak" language identification cards are available in vehicles to help identify language needs

Staff Training

All HOTW staff members receive training on:

- Title VI requirements and LEP obligations
- How to access language assistance services
- Cultural sensitivity and working with diverse populations
- Complaint procedures and how to assist families in filing complaints

Monitoring and Updating the Plan

Help On The Way will:

- Review and update this Language Assistance Plan at least every three years as part of the Title VI plan update
- Monitor the number and nature of LEP contacts
- Track requests for language assistance and languages requested
- Assess the effectiveness of language assistance measures through surveys and feedback
- Update the plan as demographics or service needs change

B7. MINORITY REPRESENTATION ON ADVISORY BOARDS

HOTW does not have a separate advisory board. However, we do have a Board of Directors that provides governance and oversight for the organization.

Board of Directors Composition

The racial and ethnic composition of Help On The Way's Board of Directors is as follows:

Race/Ethnicity	Number of Members	Percentage
Hispanic/Latino	3	100%
Total Board Members	**3**	**100%**

Board Recruitment Process

HOTW is committed to diversity in our Board composition. Our Board recruitment process includes:

- Open recruitment process that encourages diverse candidates to apply
- Outreach to community organizations serving diverse populations
- Consideration of candidates' experience with and commitment to serving diverse communities
- Regular assessment of Board composition to ensure it reflects the community we serve
- Nominations accepted from current Board members, staff, and community partners

B8. RECORDKEEPING AND REPORTING

HOTW maintains comprehensive records to demonstrate Title VI compliance and facilitate monitoring and reporting requirements.

Records Maintained

The following Title VI-related records are maintained by the Title VI Coordinator:

- **Title VI Complaint Log:** A log of all Title VI complaints received, including complaint details, investigation findings, and resolution.
- **Complaint Files:** Complete documentation for each complaint, including complaint form, correspondence, investigation notes, and final determination letters.
- **Public Involvement Records:** Documentation of surveys, meetings, and other public engagement activities, including dates, attendance, topics discussed, and feedback received.
- **LEP Assistance Requests:** Log of requests for language assistance, including language requested and services provided.
- **Board Composition Records:** Current Board membership list with demographic information.

- **Training Records:** Documentation of Title VI training provided to staff, including dates, attendees, and topics covered.
- **Title VI Plan Updates:** Current and previous versions of the Title VI Plan, along with NYSDOT approval documentation.
- **Notices and Postings:** Copies of Title VI notices posted on website, in vehicles, and in facilities.

Record Retention

All Title VI records are retained for a minimum of three years following the resolution of a complaint or the submission of the Title VI plan to NYSDOT, whichever is later. Records are maintained in both electronic format (Google Drive) and hard copy format at the administrative office.

Reporting

Help On The Way will submit Title VI reports to NYSDOT as requested, including:

- Updated Title VI Plan every three years
- Annual complaint log (if requested)
- Any significant changes to services or policies that may affect Title VI compliance
- Documentation of any Title VI complaints, investigations, or lawsuits

B9. PLAN AND POLICY REVIEW

Help On The Way is committed to ensuring ongoing Title VI compliance through regular review and updates of policies and procedures.

Title VI Plan Review Schedule

The Title VI Plan will be reviewed and updated:

- Every three years at a minimum, in accordance with FTA and NYSDOT requirements
- When there are significant changes to services, service area, or operations
- When demographic changes in the service area indicate a need for modified language assistance services
- Following any Title VI complaints or findings
- When NYSDOT or FTA guidance changes

Board Approval Process

All Title VI Plan updates must be reviewed and approved by the Help On The Way Board of Directors prior to submission to NYSDOT. The approval process includes:

6. Draft Title VI Plan prepared by Title VI Coordinator
7. Review by Executive Director
8. Presentation to Board of Directors at regular board meeting
9. Board discussion and vote on approval

10. Documentation of approval in board meeting minutes or via board resolution
11. Submission to NYSDOT with board approval documentation

Ongoing Monitoring

Between formal plan updates, the Title VI Coordinator will:

- Monitor Title VI complaints and track resolution
- Track LEP assistance requests and evaluate effectiveness of language services
- Review demographic data for service area to identify changing needs
- Ensure Title VI notices remain posted and current
- Provide regular Title VI training to staff
- Stay informed of changes to federal and state Title VI requirements

B10. FACILITY LOCATION EQUITY ANALYSIS

FTA requires transit providers to complete a Title VI equity analysis before selecting a site or location for facilities such as storage facilities, maintenance facilities, or operations centers.

Does Help On The Way plan to construct, expand, or relocate facilities?

Help On The Way does not plan to construct, expand, or relocate facilities at this time.

If plans change and a facility project is proposed, HOTW will complete a Title VI equity analysis before site selection and will submit the analysis to NYSDOT for review prior to proceeding with the project.

Current Facility:

Help On The Way, Inc.

1344 Southern Boulevard

Bronx, New York 10459

D. LIST OF APPENDICES

The following appendices are included as part of this Title VI Plan:

Appendix D1: Documentation of Board Approval
Appendix D2: Title VI Complaint Form (English and Spanish)
Appendix D3: Letter Acknowledging Receipt of Complaint
Appendix D4: Title VI Complaint Letter of Closure
Appendix D5: Title VI Complaint Letter of Finding
Appendix D6: Title VI Notice to the Public (English and Spanish)
Appendix D7: Title VI Complaint Log (Last 3 Years)