



# ST. LUKE HEALTH SERVICES

Policy Number:	
Policy Name:	Title VI – Civil Rights Assurance
Effective/Review Date:	8/1/2025
Departments Affected:	Transportation, Corporate Compliance, Executive Office

## Policy Statement:

St. Luke Health Services (SLHS) shall assure the compliance of the program based on Title VI of the Civil Rights Act of 1964. The objective of the program is to ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.

## Policy:

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

The Federal Transit Administration works to ensure nondiscriminatory transportation in support of our mission to enhance the social and economic quality of life for all Americans. The FTA Office of Civil Rights is responsible for monitoring FTA recipients' Title VI programs and ensuring their compliance with Title VI requirements.

The Federal Transit Administration has updated the Title VI Circular to 4702.1B. FTA's revised circular provides guidance to grantees on how to comply with Title VI regulations. The circular provides specific compliance information for each type of grantee and provides comprehensive appendices including additional guidance and examples to ensure recipients understand the requirements – this circular is available at:

[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Title VI FINAL.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf)

## Registering a Complaint

As part of St. Luke Health Services (SLHS) Title VI program, SLHS maintains the following procedure for investigating Title VI complaints filed against the company:

These 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.

Every effort will be made to obtain early resolution of complaints at the lowest level possible.

Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating driver, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.
  - o The preferred method is to file your complaint in writing using the [SLHS Title VI Complaint Form](#), and send it to:  
Corporate Compliance Officer  
299 E. River Road  
Oswego, New York 13126
2. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the SLHS Corporate Compliance Hotline by calling [315-342-3166](tel:315-342-3166) and leaving a detailed message and return phone number. The complainant will then be interviewed, and the SLHS Corporate Compliance Officer will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the SLHS Corporate Compliance Officer will provide a written acknowledgment to the Complainant by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided an additional 180 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Upon receipt of a complete complaint, SLHS will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Following this decision, the SLHS Chief Executive Officer or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of SLHS's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

6. When SLHS does not have sufficient jurisdiction, the SLHS Chief Executive Officer or his/her authorized designee will refer the complaint to the appropriate state or federal agency holding such jurisdiction.
7. The SLHS Chief Executive Officer or his/her authorized designee will issue letters of finding to the Complainant within 90 days from receipt of the complaint.
8. The Complainant may also file a complaint with the Federal Transit Administration:

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

FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov)

SLHS will maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming SLHS that allege discrimination on the basis of race, color, or national origin.

The list will include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by SLHS in response to the investigation, lawsuit, or complaint.

## Staff Training

Designated SLHS Transportation Staff will be provided with training regarding the Title VI Civil Rights assurances on hire and annually thereafter. This training shall include:

- Understanding the Title VI policy and responsibilities
- How to handle a Title VI complaint

## Notification of Protection Under Title VI

SLHS shall provide information to the public regarding the Title VI obligations to inform the public of the protection against discrimination afforded by Title VI. This notice shall be posted on the St. Luke Health Services' website and shall include:

- A statement that the agency operates programs without regard to race, color, and national origin.
- A description of the procedures that members of the public should follow in order to file a discrimination complaint against SLHS.

## Document History

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