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# *Title VI Implementation Plan*

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## **EAST VALLEY ADULT RESOURCES**

**Opportunities to Connect, Contribute and Care for Each Other**

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# Title VI Policy Statement

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The East Valley Adult Resources policy assures full compliance with Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that “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 otherwise subjected to discrimination” under any East Valley Adult Resources sponsored program or activity. There is no distinction between the sources of funding.

East Valley Adult Resources also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, East Valley Adult Resources will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

The CEO has delegated the authority to Traci Gruenberger, Chief Operating Officer, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Linda Volhein, Interim CEO

# Title VI Notice to the Public

## Notifying the Public of Rights Under Title VI

### East Valley Adult Resources

East Valley Adult Resources operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with East Valley Adult Resources.

For more information on East Valley Adult Resources civil rights program, and the procedures to file a complaint, contact Traci Gruenberger, (480) 964-9014, email [tgruenberger@evadultresources.org](mailto:tgruenberger@evadultresources.org); or visit our administrative office at 45 W. University Drive, Mesa, AZ. For more information, visit [www.evadultresources.org](http://www.evadultresources.org).

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **ADOT**: ATTN: Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, i.e., Spanish, contact Irma Weatherford – (480) 474-5260. Para información en Español llame: Irma Weatherford – (480) 474-5260.

## Title VI Notice to the Public -Spanish

### Aviso al Público Sobre los Derechos Bajo el Título VI East Valley Adult Resources

East Valley Adult Resources (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la East Valley Adult Resources programa de derechos civiles, y los procedimientos para presentar una queja, contacte Traci Gruenberger (480) 964-9014, o visite nuestra oficina administrativa en 45 W. University Drive, Mesa, AZ. Para obtener más información, visite [www.evadultresources.org](http://www.evadultresources.org)

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in the following locations: Apache Junction Active Adult Center, 1035 N. Idaho Road, Apache Junction, AZ*

*This notice is posted online at [www.evadultresources.org](http://www.evadultresources.org)*

# Title VI Complaint Procedures

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These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by East Valley Adult Resources including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted East Valley Adult Resources will review the complaint form to determine any action that needs to be taken.
- (7) East Valley Adult Resources has 14 days to investigate the complaint. If more information is needed to resolve the case, East Valley Adult Resources may contact the complainant. The complainant has 7 business days from the date of the letter to send requested information. If East Valley Adult Resources does not receive the additional information within 7 business days, East Valley Adult Resources can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

- (8) After Title VI program coordinator reviews the complaint, she/he 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 violation and that the case will be closed. A 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, she/he has 7 days after the date of the letter or the LOF to do so.
- (9) A complainant dissatisfied with East Valley Adult Resources decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT**: ATTN Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

# Title VI Complaint Form

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <b>Section III</b>.</i>		
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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
<input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
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 use the back of this form.		
_____		
_____		
_____		
<b>Section VI:</b>		
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

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**Section V:**

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: \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Section VI:**

Name of agency complaint is against: \_\_\_\_\_

Name of person complaint is against: \_\_\_\_\_

Title: \_\_\_\_\_

Location: \_\_\_\_\_

Telephone Number (if available): \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:  
East Valley Adult Resources, Title VI Coordinator  
45 W. University Drive  
Mesa, AZ 85201  
480-964-9014

A copy of this form can be found online at [www.evadultresources.org](http://www.evadultresources.org)

# Title VI Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

- ✓ East Valley Adult Resources has not had any Title VI complaints, investigations, or lawsuits in 2015.

## Public Participation Plan

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# *East Valley Adult Resources Public Participation Plan*

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*Apache Junction Active Adult Center*

East Valley Adult Resources is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, East Valley Adult Resources made the following community outreach efforts:

Community outreach efforts include fairs and presentations concerning needs of older and disabled adults. EVAR participated in the following social service and health fairs:

- 3/23/16 Apache Wells RV Park
- 3/19/16 Alzheimer's Association Fair
- 2/4/16 Queen Creek Senior Center
- 2/18/16 Queen Creek Senior Center
- 1/18/16 City of Apache Junction Chamber of Commerce
- 1/14/16 Volunteers for Triad
- 1/22/16 Love of Christ Lutheran Church
- 11/19/15 Healthy Living Expo
- 4/1/15 Spring Healthy Expo

*In the upcoming year East Valley Adult Resources will make the following community outreach efforts:*

- Social Service and Health Fairs (minimum 3 locations)
- Public presentations (minimum 6 locations) concerning needs of older and disabled adults. Locations will include senior communities, churches and civic groups. They will be scheduled based on the availability of space at each location.
- Transportation Survey for comment and input March 2016

**Public Meetings:**

- (1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.
- (2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.
- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

East Valley Adult Resources submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

## Limited English Proficiency Plan

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# East Valley Adult Resources

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## *Limited English Proficiency Plan*

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East Valley Adult Resources has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to East Valley Adult Resources services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the East Valley Adult Resources extent of obligation to provide LEP services, the East Valley Adult Resources undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the East Valley Adult Resources service area who may be served or likely to encounter by East Valley Adult Resources program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an East Valley Adult Resources services;
- 3) The nature and importance of the program, activities or services provided by the East Valley Adult Resources to the LEP population; and
- 4) The resources available to East Valley Adult Resources and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested

### **Safe Harbor Provision**

East Valley Adult Resources complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Public Hearings

# Non-elected Committees Membership Table

A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population (City of Apache Junction)	89.5%	7.4%	1.2%	.8%	1.1%
Board of Directors	87%	13%	0%	0%	0%
Apache Junction Active Adult Center Advisory Committee	100%	0%	0%	0%	0%

East Valley Adult Resources makes every effort to include minorities into its governance body. The Board Governance Committee is charged with nominating qualified Board members with a focus on a balanced cultural mix. Board members are cultivated utilizing knowledge of Board members and advertising in the organizational newsletter.

# Monitoring for Subrecipient Title VI Compliance

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- ✓ East Valley Adult Resources does NOT monitor (have) subrecipients for Title VI compliance.

# Board Approval for the Title VI Program

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The East Valley Adult Resources Board of Directors reviewed the Title VI implementation Plan by email on Tuesday, April 14, 2015. The tally of votes was as follows: 12 yes and 0 no. This vote will be formally noted in the May 11, 2015 Board meeting minutes.