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# Title VI Implementation Plan

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## *Northwest Valley Connect*



City of Phoenix

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## Title VI Policy Statement

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The Northwest Valley Connect 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 Northwest Valley Connect sponsored program or activity. There is no distinction between the sources of funding.

Northwest Valley Connect 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, Northwest Valley Connect will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Northwest Valley Connect distributes Federal-aid funds to another entity/person, Northwest Valley Connect will ensure all sub recipients fully comply with Northwest Valley Connect' Title VI Nondiscrimination Program requirements. The Northwest Valley Connect Board of Directors has delegated the authority to Executive Director, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

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Bonnie Boyce Wilson/ Board Chair

## Title VI Notice to the Public

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### Notifying the Public of Rights under Title VI Northwest Valley Connect

The Northwest Valley Connect 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 the Northwest Valley Connect.

For more information on the Northwest Valley Connect civil rights program, and the procedures to file a complaint, contact Kathryn Chandler/ Executive Director at 623-282-9304, (TTY 1-800-842-4681); email [kchandler@northwestvalleyconnect.org](mailto:kchandler@northwestvalleyconnect.org); or visit our administrative office at 9445 N 99<sup>th</sup> Avenue Peoria, AZ 85345. For more information, visit [www.northwestvalleyconnect.org](http://www.northwestvalleyconnect.org).

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **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, contact Kathryn Chandler/Executive Director / Mobility Manager. Para información en Español llame: Kathryn Chandler /Executive Director/Mobility Manager

## Title VI Notice to the Public -Spanish

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### **Aviso al Público Sobre los Derechos Bajo el Título VI Northwest Valley Connect**

Northwest Valley Connect (*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 Northwest Valley Connect programa de derechos civiles, y los procedimientos para presentar una queja, contacte Kathryn Chandler Executive Director, 623-282-9300, (TTY 623-222-1002); o visite nuestra oficina administrativa en 9445 N 99<sup>th</sup> Ave. Peoria AZ 85345. Para obtener más información, visite [www.northwestvalleyconnect.org](http://www.northwestvalleyconnect.org)

El puede presentar una queja directamente con City of Phoenix Publicó Transita Departamento o Federal Transita Administración (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil right: FTA: ATTN Titule VI Programa Coordinator, East Boulding, 5th Flor –TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in the following locations: It will be posted on our website and on our vehicle.*

*This notice is posted online at [www.northwestvalleyconnect.org](http://www.northwestvalleyconnect.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 Northwest Valley Connect 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 Northwest Valley Connect will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Northwest Valley Connect or submitted to the State or Federal authority for guidance.
- (7) Northwest Valley Connect will notify the City of Phoenix Public Transit Department of ALL Title VI complaints within 72 hours via telephone at 602-712-8946; email at [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov).

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- (8) Northwest Valley Connect has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 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 30 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator 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. 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, she/he has 30 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with Northwest Valley Connect decision may file a complaint with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) offices of Civil Rights: **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: [www.northwestvalleyconnect.org](http://www.northwestvalleyconnect.org)

## Northwest Valley Connect



## 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

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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:

Northwest Valley Connect: Kathryn Chandler/Executive Director/Mobility Manager  
9445 N 99<sup>th</sup> Ave Peoria, AZ 85345 [kchandler@northwestvalleyconnect.org](mailto:kchandler@northwestvalleyconnect.org)  
623-282-9304 or fax 623-282-9301

A copy of this form can be found online at [www.northwestvalleyconnect.org](http://www.northwestvalleyconnect.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>	0			
1)				
2)				
<b>Lawsuits</b>	0			
1)				
2)				
<b>Complaints</b>	0			
1)				
2)				

X Northwest Valley Connect has not had any Title VI complaints, investigations, or lawsuits 9/2019 to 9/2020.

## Public Participation Plan

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# Northwest Valley Connect Public Participation Plan

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## Northwest Valley Connect - Title VI -Plan: City of Phoenix

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Northwest Valley Connect 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 and/or surveys. As an agency receiving federal financial assistance, Northwest Valley Connect made the following community outreach efforts 2019:

- Presentations at community meetings such as the Rotary in Sun City West, Low Vision support groups at multiple churches, Northwest Valley Transportation Stakeholders, American Association of University Women in Sun City West, League of Women Voters, Sun Health Care Transitions team, The Salvation Army and more.
- Vendor tables at annual Expos and Health Fairs in Youngtown, Sun City, Sun City West, Sun City Grand, Surprise and Peoria.
- Brochures distributed to Boswell Medical Center Case Managers, Del Webb Medical Center Case Managers, Eye Care offices, Medical offices, Our Neighborhood Network offices, and many more.
- Regular public outreach in press releases and articles in the local papers – Independent and Daily Sun.

In the upcoming year Northwest Valley Connect will make the following community outreach efforts:

- Provide presentations to area church groups, medical groups, human service staff meetings, and more.
- Provide brochures to medical offices, human services agencies such as the Area Agency on Aging offices and Senior Centers in the area.
- Provide more presentations with our Ambassador group for the area clubs and groups they are associated with.
- Regular press releases and articles for local newspapers in order to announce any changes or additions to our programs.
- Veterans groups such as the Luke Success Center for staff who will refer clients in need, and through our partnership with The Reveille Foundation.
- New organizations will be in our outreach program through our new Marketing Campaign.

### **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.

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- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible (Most of our area does not have transit routes.) or on new zoom or other on-line options due to covid-19 concerns.

Northwest Valley Connect submits to the annually City of Phoenix Public Transit Department 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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# Northwest Valley Connect

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*Limited English Proficiency Plan*

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## Northwest Valley Connect - Title VI -Plan: City of Phoenix

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Northwest Valley Connect 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 Northwest Valley Connect 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 Northwest Valley Connect extent of obligation to provide LEP services, the Northwest Valley Connect 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 Northwest Valley Connect service area who may be served or likely to encounter by Northwest Valley Connect program, activities, or services; increases every year. NVC has partnered with the City of El Mirage and the Dysart Community Center and we have contacts in each whom we can call 8 – 5 Monday through Friday in order to translate for us.
- 2) The frequency with which LEP individuals come in contact with a Northwest Valley Connect services; Many of our daily clients speak Spanish but most also speak English. Very few of our clients don't speak English.
- 3) The nature and importance of the program, activities or services provided by the Northwest Valley Connect to the LEP population; All of our materials for client enrollment are in Spanish also. Our signage is also in English and Spanish.
- 4) The resources available to Northwest Valley Connect and overall cost 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. Northwest Valley Connect Intern is bilingual and we have volunteers who also speak Spanish. Northwest Valley Connect has also partnered with the City of El Mirage, the Manager of the El Mirage Senior Center and the folks at the Dysart Community Center to translate if there isn't someone in our office when a Spanish speaking client calls.

### Safe Harbor Provision

Northwest Valley Connect 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



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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

Northwest Valley Connect has adopted the City of Phoenix Public Transit Title VI Language Access Plan. Attached is this document.

## (5) Non-elected Committees Membership Table

A sub recipient 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. Sub recipients 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	92.7%	4.1%	1.5%	1%	.2%
NVC Advisory Committee	80%	20%	0%	0%	0%

The Advisory Committee members are chosen for the skills and experience they bring to the committee and for the geographic area and diversity they bring to this committee and organization.

Northwest Valley Connect does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

## Monitoring for Sub recipient Title VI Compliance

Northwest Valley Connect does NOT monitor sub recipients for Title VI compliance.

## Title VI Equity Analysis

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A sub recipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

***Note: Even if facility construction is financed with non-FTA funds, if the sub recipient organization receives any FTA dollars, it must comply with this requirement.***

Northwest Valley Connect has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since has never had a facility built.

## Board Approval for the Title VI Program

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ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

