
Title VI Implementation Plan

Civitan Foundation, Inc.

2023-2026

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Title VI Policy Statement

This Civitan Foundation, Inc. policy assures full compliance with Title VI of the Civil Rights act of 1964 and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any Civitan Foundation sponsored program or activity. There is no distinction between the sources of funding.

Civitan Foundation 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, Civitan Foundation will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Civitan Foundation distributes Federal-aid funds to another entity/person, Civitan will ensure all subrecipients fully comply with Civitan Title VI Nondiscrimination Program requirements. The Chief Executive Officer has delegated the authority to Director of Program Services, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

A handwritten signature in black ink that reads "Dawn Trapp". The signature is written in a cursive style with a long horizontal stroke at the end.

Dawn Trapp, Chief Executive Officer

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI **Civitan Foundation, Inc.**

The Civitan Foundation operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint directly with Civitan Foundation.

For more information on the Civitan Foundation's civil rights program, and the procedures to file a complaint, contact Director of Compliance at 602-953-2944, or you can visit our administrative office at 12635 N 42nd Street. For more information, visit <https://www.civitanfoundationaz.com/>

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: **City of Phoenix Public Transit Department:** ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003
FTA: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 602-953-2944. Para información en Español llame.

The above notice is posted in the following locations: In Vehicles, in our building lobby and entries. This notice is posted online at <https://www.civitanfoundationaz.com/>

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Civitan Foundation, Inc.

Civitan Foundation (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964. 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 Civitan Foundation's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Director of Compliance 602-953-2944, (TTY); o visite nuestra oficina administrativa en 12635 N. 42nd Street in Phoenix, AZ. Para obtener más información, visite <https://www.civitanfoundationaz.com/>

El puede presentar una queja directamente con City of Phoenix Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN Title VI Coordinator 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 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: In Vehicles, in our building lobby and entries. This notice is posted online at <https://www.civitanfoundationaz.com/>

Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to any program or activity that is administered by Civitan Foundation Inc. 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, or national origin 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 Civitan Foundation Inc. 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 Civitan Foundation Inc. or submitted to the State or Federal authority for guidance.
- (7) Civitan Foundation Inc. will notify the Title VI Coordinator of all Title VI complaints within 72 hours via telephone at: 602-262-7242; email to: phxtransiteo@phoenix.gov

- (8) Civitan Foundation Inc. 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 Civitan Foundation Inc. decision may file a complaint directly with the City of Phoenix Public Transit Department (COP): Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003 or the Federal Transit Administration (FTA) offices of Civil Rights: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: <https://www.civitanfoundationaz.com/>

Procedimientos de Quejas Bajo el Título VI

Estos procedimientos proporcionan orientación para todas las quejas presentadas bajo el Título VI del Decreto de los Derechos Civiles de 1964, en lo que se refieren a cualquier programa o actividad que sea administrado por la Civitan Fundación Inc. incluyendo a los asesores, contratistas y proveedores. Por ley, se prohíbe la intimidación o las represalias como resultado de una queja. Además de estos procedimientos, los reclamantes se reservan el derecho de presentar una queja formal ante otras agencias estatales o federales o de solicitar asesoría privada para quejas alegando discriminación. Se hará todo lo posible para resolver las quejas al nivel más bajo posible.

- (1) Cualquier persona que crea que ha sido discriminada por motivos de raza, color, u origen nacional puede presentar una queja bajo el Título VI completando y presentando la Forma de Quejas del Título VI de la agencia.
- (2) Las quejas formales se deben presentar dentro de 180 días de calendario de la última fecha del supuesto acto de discriminación o de la fecha en la que el/los reclamante/s se haya/n enterado de la supuesta discriminación, o cuando haya habido un curso de conducta continuo, la fecha en la que la conducta haya sido suspendida o la última ocasión en la cual ocurrió la conducta.
- (3) Las quejas se deben hacer por escrito y deben ser firmadas por el/los reclamante/s y deben incluir el nombre, el domicilio y el número de teléfono del/los reclamante/s. Si es necesario, la persona de contacto del Título VI ayudará al/la reclamante a documentar las cuestiones.
- (4) Las alegaciones recibidas por fax o por correo electrónico serán admitidas y procesadas, una vez que se haya establecido la identidad del/la reclamante y la intención de proceder con la/s queja/a. Para ello, se requiere que el/la reclamante envíe por correo postal una copia original firmada del fax o de la transmisión de la nota electrónica para que la queja sea procesada.
- (5) Las alegaciones recibidas por teléfono se reducirán a un formato por escrito y se les proveerán al/la reclamante para su confirmación o revisión antes de su procesamiento. Se remitirá una forma de la queja al/la reclamante para que la complete, la firme y la devuelva para su procesamiento.
- (6) Una vez presentada, la Civitan Fundación Inc. revisará la forma de la queja para determinar la jurisdicción. Todas las quejas recibirán una carta de reconocimiento informándole si la queja será investigada por la Civitan Fundación Inc. o presentada a la autoridad estatal o federal para recibir su orientación.

- (7) La Civitan fundación Inc. le notificará al Coordinador del Título VI sobre todas las quejas del Título VI dentro de 72 horas por teléfono llamando al: 602-262-7242; por correo electrónico escribiendo a: phxtransiteo@phoenix.gov
- (8) La Civitan Fundación Inc. tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el/la reclamante. El/la reclamante tiene 60 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el/la reclamante o no recibe la información adicional dentro de los 30 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso también se puede cerrar administrativamente si el/la reclamante ya no desea seguir adelante con su caso.
- (9) Después de que el investigador revise la queja, emitirá una de dos cartas al/la reclamante: una carta de cierre o una carta de hallazgo "Letter of Finding" (LOF). Una carta de cierre resume los alegatos y afirma que no hubo una infracción con respecto al Título VI y que el caso se cerrará. Una carta LOF resume las alegaciones y las entrevistas con respecto al supuesto incidente, y explica si se llevará a cabo alguna acción disciplinaria, capacitación adicional del/la miembro del personal u otra acción. Si el/la reclamante desea apelar a la decisión, tiene 30 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Un/a reclamante insatisfecho/a con la decisión de la Civitan Fundación Inc. puede presentar una queja directamente con el Departamento de Transporte Público de la Ciudad de Phoenix: City of Phoenix Public Transit Department (COP), Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, ó con las oficinas de Derechos Civiles de la Administración Federal de Transporte: Federal Transit Administration (FTA), Offices of Civil Rights, Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) Una copia de estos procedimientos se puede encontrar en línea en: <https://www.civitanfoundationaz.com/>

Civitan Foundation, Inc.

Title VI Complaint Form

Note: The following information is needed to assist in processing your complaint.

Complainant's Information:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

Person Discriminated Against (someone other than complainant)

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

Which of the following best describes the reason you believe the discrimination took place?

Race/Color (Specify) _____

National Origin (Specify) _____

On what date(s) did the alleged discrimination take place? _____

Describe the alleged discrimination. Explain what happened and who you believe was responsible (if additional space is needed, add a sheet of paper).

List names and contact information of persons who may have knowledge of the alleged discrimination.

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? 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: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

Please sign below. You may attach any written materials or other information you think is relevant to your complaint.

Complainant Signature

Date

Submit form and any additional information to:

Civitan Foundation, Inc Title VI Program

Jeanne Anastasopoulos, Title VI Program Coordinator, 12635 N. 42nd Street, Phoenix, AZ 85032

Phone: 602-953-2944 Fax: 602-953-2946

**Forma Para Poner una
Queja
(De Acuerdo Al Título
VI)**

Nota: La siguiente información se necesita para procesar su queja.

Información de la persona que está poniendo la queja:

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Persona A La Que Se Discriminó (alguien que no sea la persona que está poniendo la queja)

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

¿Cuál de las siguientes razones describe por lo que usted siente que se le discriminó?

Raza/Color (Especifique) _____ Nacionalidad (Especifique) _____

¿En qué fecha(s) sucedió la discriminación? _____

Describa la presunta discriminación. Explique qué sucedió y quién cree usted que fue responsable (si necesita más espacio, agregue otra hoja).

Escriba una lista con los nombres de las personas que puedan tener conocimiento de la presunta discriminación y cómo contactarlas.

¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal? Marque todas las que apliquen.

Agencia Federal _____ Agencia Estatal _____ Corte Federal _____
Corte Estatal _____ Agencia Local _____

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre: _____
Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Por favor firme abajo. Puede anexar cualquier material escrito u otra información que usted crea que es relevante sobre su queja.

Firma de la Persona que presenta la queja Fecha

Número de Anexos: _____

Someta la forma y cualquier información adicional a:
Civitan Foundation, Inc, Title VI Program
Jeanne Anastasopoulos Title VI Program Coordinator
12635 N. 42nd street, Phoenix, AZ 85032
Phone: 602-953-2944 Fax: 602-953-2946
info@campcivitan.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?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

Civitan Foundation has not had any Title VI complaints, investigations, or lawsuits in 2020/23

Civitan Foundation, Inc. Public Participation Plan

The Civitan Foundation, Inc. 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, Civitan Foundation, Inc. made the following community outreach efforts:

- Quarterly surveys of public directly impacted by services;
- Monthly emails with service offerings listed; including brochures and fliers.
- Monthly calendars with service offerings listed;
- One-on-one case management to determine service needs; every 90 days.
- On-going access to transportation manager to ensure service needs are being met.

In the upcoming year Civitan Foundation, Inc. will make the following community outreach efforts:

- Bi-annual meeting to address service needs/complaints;
- Quarterly survey of public directly impacted by services;
- On-going access to transportation manager to ensure service needs are being met.

Public Meetings:

- (1) Bi-Annual 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 all abilities and are located near a transit route when possible.

Civitan Foundation, Inc. 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

The Civitan Foundation, Inc. is committed to providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws, including Title VI or the 1964 Civil Rights Act which requires non-discrimination to all Title VI protected classes; including race, color or national origin.

It is the policy of this agency to provide language access service to populations of persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.

Any individual eligible for programs/services at the Civitan Foundation, Inc. who cannot speak, read, write or understand English language at a level that permits them to interact effectively with our staff has the following rights: To interpreting service at no cost to them. The right to complain about language services provided to them and information about discrimination complaint resolution process available to them.

FTA Circular 4702.1B identifies four factors that recipients of federal funds should follow when determining what reasonable steps should be taken to ensure meaningful access for LEP persons. The four factor analysis involves the following:

1. Identify the number or proportion of LEP persons eligible to be served or likely to be encountered with transit service.
2. Determine the frequency with which LEP individuals come in contact with transit service.
3. Determine the nature and importance of transit service provided to LEP individuals.
4. Assess the resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

Factor 1

Civitan serves individuals who are developmentally disabled. All services are contracted through the Division of Developmental Disabilities. Referrals for services come through DDD. Current number of active clients is 613. We do not currently have members with a LEP. We do have members who speak Spanish and they may have families members with a LEP. This is less than 10% of the population currently served.

Factor 2

All client needs are determined during intake and during the assessment at the start of services and reviewed every 90 days. During this assessment it is also determined what the transportation needs are. None of the members we transport at this time have a LEP. We do have ADA statements posted in every vehicle in both English and Spanish. If it is determined that a member has a LEP accommodations are made to support the needs of the client. A qualified interpreter services at no cost to client will be provided to them. Information about discrimination complaint resolution process available to them at site locations and on Civitan web site.

Factor 4

Civitan has a strong commitment to reducing the barriers encountered by LEP persons in accessing its services and benefits, to the extent resources are available. Civitan currently does not break down all cost expenditures related to providing language assistance. Some cost incurred would be the hiring and training of bi lingual staff as providers and drivers. Also available to translate and provide interpreting services as needed. Some cost associated with promotional materials used during outreach events.

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. 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	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%

Civitan Foundation, Inc. does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Civitan does NOT monitor sub recipients for Title VI compliance.

Title VI Equity Analysis:

Civitan Foundation, Inc has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since November, 2012 when Civitan purchased the site.

Board Approval for the Title VI Program

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

Meeting Notes:
Board of Directors of Civitan Foundation, Inc.
Friday, October 17, 2023
Electronic Communication

I. Call to order –Meeting called to order by John Day by email contact.

II. Matter before the Board – Review of Title VI plan 2023-2026.

Background: Borad review is necessary prior to submission of plan to City of Phoenix
MAG.

III. The Motion –

The Chairperson requests a motion to allow the Civitan Foundation, Inc. to review and
approve the Title VI Plan that will be submitted to the City of Phoenix, MAG.

Upon receiving the consensus of the Board Members, the Plan will be submitted to the
City of Phoenix, Public Transportation Department to meet compliance with the Vehicle
Grant.

Steve Potter has made this motion; Maria Laughner has seconded this motion.

Please reply with your electronic vote by Monday October 17, 2023 – Noon.

I thank you for your consideration in these matters,

/s/ John W Day, DMD, MS
Chairperson
Civitan Foundation, Inc.

[johnday@dakotacom.net]

IV. Consensus of the Board Members:

Yes, for the motion.	Doug Plasencia	[dplasencia@moffattnichol.com]
Yes, for the motion.	Frank Nightingale	[nightingalef@stifel.com]
I will vote yes.	Ed Trapp CPA	[ed@TrappLtd.com]
I vote to approve this motion.	Philip L. Solinsky	[Phil@Solinsky-Inc.com]
Yes, looks good to me.	Rick Richardson	[rickr@r2az.com]
Yes, I agree with the motion.	Maria Laughner	[marialaughneraz@gmail.com]

Yes, to this motion.

Steve Potter

[shpotter@asu.edu]

V. The motion was approved by electronic vote of the Board Members on October 17, 2023.

VI. Meeting Adjourned by email contact, October 17, 2023.

Date: Oct. 17, 2023



Ed Trapp (Secretary)



John W Day, DMD (Board Chairperson)