Title VI Implementation Plan

Sun City Area Interfaith Services Inc.
dba Benevilla
January 2022-January 2025

Contents

Title VI Policy Statement

The Benevilla 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 Benevilla sponsored program or activity. There is no distinction between the sources of funding.

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

When Benevilla distributes Federal-aid funds to another entity/person, Benevilla will ensure all subrecipients fully comply with Benevilla Title VI Nondiscrimination Program requirements. The Vice President of Program Operations has delegated the authority to Senior Director of Enrichment Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

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Joanne Thomson, President/CEO

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI
Benevilla

The Benevilla 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 with the Benevilla.

For more information on the Benevilla's civil rights program, and the procedures to file a complaint, contact Courtney Allen, Vice President of Program Operations at 623-584-4999, (TTY 711); email callen@benevilla.org; or visit our administrative office at 16752 N Greasewood Street Surprise, AZ 85378. For more information, visit www.benevilla.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: **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 Courtney Allen, Vice President of Program Operations at 623-584-4999. Para información en Español llame: Courtney Allen Vice President of Program Operations at 623-584-4999.

***This can be located in both Spanish and English at https://benevilla.org/life-enrichment-programs-respite-care/ on the Benevilla Website.*

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Benevilla

Benevilla *(y sus subcontratistas, si cualquiera)* asegura complir 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 pais de origen.

Para obtener más información sobre la Benevilla's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Courtney Allen, Vice President of Program Operations 623-584-4999, (TTY 711); o visite nuestra oficina administrativa en 17652 N. Greasewood Street Surprise, AZ 85378. Para obtener más información, visite www.benevilla.org.

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: online at https://benevilla.org/life-enrichment-programs-respite-care/ on the Benevilla Website., at all 4 Life Enrichment Programs, in Vice President of Program Operations Office, and on all Benevilla vehicles.

***This can be located in both Spanish and English at https://benevilla.org/life-enrichment-programs-respite-care/ on the Benevilla Website.*

Title VI Complaint Procedures

Benevilla welcomes comments, complements, and complaints from customers on their experiences using Benevilla services. Customer input helps us identify areas needing improvement, and commendations are always appreciated.

All customer complaints are carefully reviewed, and those submitted by customers who experience accessibility or ADA-related problems are additionally reviewed for adherence to Benevilla policies by the Vice President of Program Operations.

To file an ADA-related service complaint, customers may contact Benevilla using any of the following methods:

Via Mail to:

Benevilla
c/o Benevilla, Courtney Allen
16752 N. Greasewood Street
Surprise, Arizona 85378

Via Phone

623-584-4999
TTY 711

Via OCTA Website

www.benevilla.org

Via Email

callen@benevilla.org
Benevilla will investigate the complaint and promptly communicate a response to the customer with 10 business days.

All submittal methods will result in the Customer Relations department receiving the complaint information and entering it into the customer comment data base, which documents every complaint received and all related follow-up activities. Customers with an ADA-related complaint will receive a complaint confirmation/tracking reference number, usually within the same day but no later than ten (10) business days from the day Benevilla receives the complaint. If the customer does not receive a response within the ten (10) day timeframe, he or she can call the Vice President of Program Operations at 623-584-4999 to obtain the confirmation/tracking reference number.

Responsible Benevilla operating divisions or administrative departments investigate all complaints and implement any corrective actions to be taken. Complaints involving ADA or accessibility elements

receive an additional review by Courtney Allen, Vice President of Program Operations after the investigation has been completed. After the ADA Compliance oversight review has been completed, Customer Relations will provide a written reply to the customer, to the contact address provided, within ninety (90) days of receiving the complaint. All complaints are investigated within a few weeks, but some may require more extensive investigation, or require more time to identify corrective

Title VI Complaint Forms

TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at *csr@valleymetro.org*.

SECTION 1: CUSTOMER INFORMATION

First Name:_____ Last Name:_____
Address:_____
City:_____ State:_____ Zip:_____
Home Phone:_____ Cell Phone:_____
Email:_____ Preferred method of contact: ☐ Phone ☐ Email

SECTION 2: INCIDENT INFORMATION

Date of Incident:_____ Time of Incident:_____ ☐ AM ☐ PM City:_____
Incident Location:_____ Direction of Travel:_____
Route #:_____ Bus/Light Rail/Streetcar #:_____
Service Type: ☐ Local Bus ☐ Express/RAPID ☐ Circulator/Connector ☐ Light Rail ☐ Streetcar ☐ Dial-a-Ride
Operator Name:_____
Operator Description:_____
What was the discrimination based on *(Check allthat apply)*: ☐ Race ☐ Color ☐ National Origin ☐ Other_____

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? ☐ Yes ☐ No
If yes, please provide information about a contact person at the FTA where the complaint was filed:
Name:_____ Title:_____
Address:_____ Phone:_____

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No
Signature and date required below:

Signature_____
Date_____

City of Phoenix | VALLEY METRO

FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) ó por correo electrónico a *csr@valleymetro.org*.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre:_____ Apellido:_____
Domicilio:_____
Ciudad:_____ Estado:_____ Código Postal:_____
Teléfono del Hogar:_____ Teléfono Celular:_____
Correo Electrónico:_____ Método preferido de contacto: ☐ Teléfono ☐ Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente:_____ Hora del Incidente:_____ ☐ AM ☐ PM Ciudad:_____
Ubicación del Incidente:_____ Dirección del Viaje:_____
Ruta #:_____ Autobús/Tren Ligero/Tranvía #:_____
Tipo de Servicio ☐ Autobús Local ☐ Express/RAPID ☐ Circulador/Conector ☐ Tren Ligero ☐ Tranvía ☐ Dial-a-Ride
Nombre del/la Operador/a:_____
Descripción del/la Operador/a:_____
¿En qué se basó la discriminación? *(Marque todo lo que sea aplicable)*:
☐ Raza ☐ Color ☐ Origen Nacional ☐ Otro_____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? ☐ Sí ☐ No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:
Nombre:_____ Título:_____
Domicilio:_____ Teléfono:_____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? ☐ Sí ☐ No
Firma y fecha requeridas abajo:

Firma_____
Fecha_____

City of Phoenix | VALLEY METRO

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.

Name and/or Case Number	***Date Case Filed (Month, Day, Year)***	***Case Summary (include basis of complaint: ex. race, color, national origin)***	***Case Status/ Response***	***Case Resolution Action***
Investigations				
Lawsuits				
Complaints				

Benevilla Public Participation Plan

Benevilla 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, Benevilla made the following community outreach efforts:

- Presentations at community meetings such as Rotary clubs, Elks Clubs, Parish Nurses meetings.
- Benevilla staff and volunteers on the Board of Northwest Valley Connect.
- Benevilla hosts the Transportation stakeholders meetings.

In the upcoming year Benevilla will make the following community outreach efforts:

- Regular presentations at community events in the area.
- Continued support of the Northwest Valley Connect through staff and volunteers on the Board of Directors, and in-kind space for the agency.
- Continued support of the Transportation stakeholders meetings.

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.

Benevilla submits to the City of Phoenix annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

When there is some type of service disruption, route/destination elimination, adding a route/destination how does Benevilla notify their “public” aka customers particularly in the low-Income and minority and provide an avenue for these populations to participate in or comment on the service change by the customer service line at Benevilla at 623-584-4999, and holding meetings as needed for the public that would be published on the website and through a flyer.

Benevilla

Limited English Proficiency Plan

Limited English Proficiency Plan

Benevilla 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 Benevilla 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 procedure 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 Benevilla's extent of obligation to provide LEP services.

Benevilla took the following factors into consideration when developing this plan.

1) The number or proportion of Limited English persons eligible in the Benevilla service area who may be served or likely to encounter by Benevilla program, activities, or services.

2) The frequency with which Limited English individuals come in contact with Benevilla services.

3) The nature and importance of the program, activities or services provided by Benevilla to the Limited English population.

4) The resources available to Benevilla and overall cost to provide LEP assistance.

A brief description of these considerations is provided in the following section.

Limited English Proficiency Plan

Step 1: To determine the service area demographics of Benevilla.

Tool Used: Civil Rights compliance data collection form from CACFP and demographic data from the Benevilla CARES department.

Goal: At the beginning of each calendar year review the tools used to determine the best approach for LEP.

Step 2: Determine the frequency with which limited English individuals come in contact with Benevilla services.

Tool used: Civil Rights compliance data collection form from CACFP and demographic data from Intake department.

Step 3: To determine the nature and importance of the program, activities or services provided by Benevilla to the limited English population.

Tool used: Intake form, enrollment forms.

Goal: To provide language assistance to those who need the Benevilla services.

Step 4: To determine the resources available to Benevilla and overall cost to provide LEP assistance.

Tools to use: Staff in the Administration, Family Resource Center, Restorative Life Enrichment, West Valley Life Enrichment, Lucy Anne's Place Life Enrichment, Wirtzie's and Birt's Bistro are Bilingual. We also have a robust volunteer force that can be called upon to help with translation to help a person with Limited English utilize our services. Forms are available in our Life Enrichment Program that is in both English and Spanish. Employment posters have both English and Spanish verbiage. Member rights are posted in both English and Spanish where applicable. Forms for the CDBG and CACFP programs will in both English and Spanish.

Goal: To determine other necessary resources/tools for those with Limited English.

Approaches:

During time of enrollment or service the potential client will have an interview with the appropriate personnel. During that interview staff will assess if Limited English is noted with the client. If limited English is noted Benevilla will provide reasonable resources to help the person with limited English understand the scope of service they are requesting.

Staff has and will continue to receive training on cultural diversity and sensitivity training.

Safe Harbor Provision

Benevilla 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) Bus Schedules
(5) Route Changes
(6) 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	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%

X Benevilla does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

x Benevilla does NOT monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

Benevilla has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since 2009.

☒ **Title VI Implementation Plan** has no current or anticipated plans to develop new transit facilities covered by these requirements

Board Approval for the Title VI Plan

Board of Directors Minutes
11/18/2021

Title VI Transportation Plan –<u>MOTION</u>: Shannon Arriola entertained a motion to approve the Title VI Implementation Plan. Larry Vering moved, and Harriet Doolittle seconded. All were in favor. Motion carried.