
Title VI Plan

***Sun City Area Interfaith
Services Inc.***

dba Benevilla

November 18th 2024-

January 31st 2027

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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.

A handwritten signature in cursive script that reads "Joanne Byers".

Joanne Byers, 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.

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 3 Life Enrichment Programs, in Vice President of Program Operations Office, and on all Benevilla vehicles^[SH1].

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 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 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

Para información en Español llame: Courtney Allen Vice President of Program Operations at 623-584-4999.

El aviso anterior se publica en los siguientes lugares: en línea en <https://benevilla.org/life-enrichment-programs-respite-care/> en el sitio web de Benevilla, en los 3 Programas de Enriquecimiento de la Vida, en la Oficina del Vicepresidente de Operaciones del Programa y en todos los vehículos de Benevilla. **Se puede encontrar tanto en español como en inglés en <https://benevilla.org/life-enrichment-programs-respite-care/> en la página web de Benevilla.

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 Benevilla 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 Benevilla 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 Benevilla or submitted to the State or Federal authority for guidance.
- (7) Benevilla 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) Benevilla 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 Benevilla 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

A copy of these procedures can be found online at: www.benevilla.org

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 Benevilla, 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 Benevilla 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 Benevilla o presentada a la autoridad estatal o federal para recibir su orientación.
- (7) La Benevilla 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 Benevilla 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 Benevilla 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: www.benevilla.org

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 all that 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 _____



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) o 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 ☐ ~~OTRO~~
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 _____



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. Benevilla has not had any Title VI complaints, investigations, or lawsuits in 2024.

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

X Benevilla has not had any Title VI complaints, investigations, or lawsuits during the review period October 30th 2024.

Public Participation Plan

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.
 - 1/10/2024 Sun City West Community Foundation
 - 1/26/2024 Happy Trails RV 55+ Community Event
 - 2/2/2024 Estrella Mountain Community College
 - 2/13/2024 Pendergast Community Center
 - 2/21/2024 The Colonnade Community Event
 - 2/27/2024 The Salvation Army Northwest Valley Corps Event
 - 3/18/2024 Grandview Terrace Community Event
 - 4/5/2024 Rose Garden 55+ Community Event
 - 4/17/2024 Arrowhead Valley Retirement Resort
 - 5/1/2024 Inspira Arrowhead Valley Community event
 - 6/12/2024 SCW Community Foundation
 - 8/1/2024 Legacy House in Avondale
 - 8/16/2024 Northwest VA Clinic
 - 9/11/2024 SRP PERA Club
 - 9/24/2024 Sun Village Community Association
 - 10/8/2024 Solana At the Park Event
 - 10/14/2024 Ottawa University

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

- Quarterly presentations at community events in the area.
11/1/2024 Willow brook United Methodist Church
11/8/2024 Benevilla Caregiver Connect
11/19/2024 Solana at the Park

Other meeting dates are TBD based on schedules.

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.

Limited English Proficiency Plan

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.

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, West Valley Life Enrichment, Lucy Anne's Place Life Enrichment, and Wirtzie's 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 have nor monitors subrecipients.

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
10/30/2024

Title VI Transportation Plan –Please see attached Board Minutes