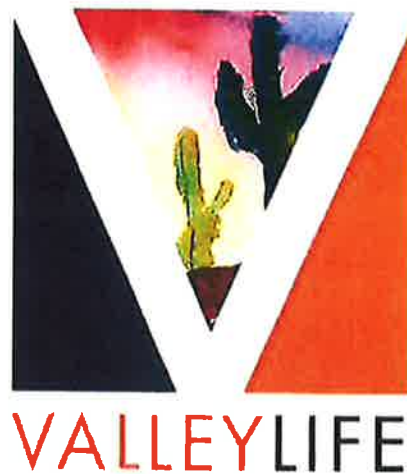


# *Title VI Implementation Plan*

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Changing Lives. Creating Community.

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## **Title VI Policy Statement**

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The VALLEYLIFE policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987 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 VALLEYLIFE sponsored program or activity. There is no distinction between the sources of funding.

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

When VALLEYLIFE distributes Federal-aid funds to another entity/person, VALLEYLIFE will ensure all subrecipients fully comply with VALLEYLIFE Title VI Nondiscrimination Program requirements. The President & CEO, Cletus Thiebeau, has delegated the authority to Vickie Pence, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Cletus Thiebeau, President & CEO

## Title VI Notice to the Public

*This notice is posted on VALLEYLIFE's website, [www.valleylifeaz.org](http://www.valleylifeaz.org) and in the VALLEYLIFE Main Campus lobby.*

### Notifying the Public of Rights Under Title VI VALLEYLIFE

VALLEYLIFE 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 VALLEYLIFE.

For more information on VALLEYLIFE's civil rights program, and the procedures to file a complaint, contact Vickie Pence at 602-331-2402 or email [vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org) or visit our administrative office at 1142 W. Hatcher Road, Phoenix, AZ 85021. For more information, visit [www.valleylifeaz.org](http://www.valleylifeaz.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. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 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 Vickie Pence at 602-331-2402 or [vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org). Para información en Español llame: Vickie Pence at 602-331-2402 or [vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org)

## **Title VI Notice to the Public -Spanish**

*This notice is posted on VALLEYLIFE's website, [www.valleylifeaz.org](http://www.valleylifeaz.org) and in the VALLEYLIFE Main Campus lobby.*

### **Aviso al Público Sobre los Derechos Bajo el Título VI VALLEYLIFE**

VALLEYLIFE (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 VALLEYLIFE's's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Vickie Pence at (602) 331-2402 or email [vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org) o visite nuestra oficina administrativa en 1142 W. Hatcher Road, Phoenix, AZ 85021. Para obtener más información, visite [www.valleylifeaz.org](http://www.valleylifeaz.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. 1<sup>st</sup> 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

# Title VI Complaint Procedures

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Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any VALLEYLIFE service, program or activity, and believes the discrimination is based upon race, color or national origin, may file a formal complaint with VALLEYLIFE's Human Resources department. This antidiscrimination protection also extends to the activities and programs of VALLEYLIFE's third party contractors. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes VALLEYLIFE must ensure 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 subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged noncompliance with Title VI and related statutes may be lodged with the VALLEYLIFE Human Resources department. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

To submit a complaint online, fill out the online complaint form on the VALLEYLIFE website at [www.valleylifeaz.org](http://www.valleylifeaz.org)

To submit a claim by mail or in person, please fill out the printable complaint form and mail/deliver it to:

VALLEYLIFE  
Vickie Pence  
Human Resources Manager  
1142 W. Hatcher Rd.  
Phoenix, AZ 85021  
602-331-2402  
Email: [vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org)

Complaints received by VALLEYLIFE's Human Resources department will be assigned to the appropriate staff member(s) for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, Human Resources will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for this region, is responsible for monitoring this process.

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by VALLEYLIFE may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form or by calling VALLEYLIFE's Human Resources department. All complaints are logged into VALLEYLIFE's complaint log and will be investigated according to federal standards.

VALLEYLIFE's Title VI Complaint Form (English and Spanish) is located on our website at [www.valleylifeaz.org](http://www.valleylifeaz.org)

To request information about VALLEYLIFE's information in an alternative format, please contact Vickie Pence at 602-331-2402 or [mvpence@valleylifeaz.org](mailto:mvpence@valleylifeaz.org)

VALLEYLIFE has 30 days to investigate each complaint. If more information is needed to resolve the case, VALLEYLIFE may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed.

A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to VALLEYLIFE's Human Resources department.

### **Procedures for Tracking and Investigating Title VI Complaints**

#### **Tracking**

Complaint comes in to VALLEYLIFE's Human Resources department and is logged into the VALLEYLIFE Title VI Complaint Log (the Log). The Human Resources department is responsible for ensuring that information is complete, that all appropriate parties are notified within 24 hours for the closure of the complaint. VALLEYLIFE's President & CEO and Human Resources Manager will audit complaints to ensure appropriate notifications and closure.

#### **Investigating**

**Step 1:** Summary of the complaint, completed by VALLEYLIFE's Human Resources department.

**Step 2:** Statement of issues.

List every issue derived from the complaint summary. Include questions raised by each issue:

1. Who?
2. What?
3. When?
4. Where?
5. How?

Add new issues that surface during investigation. The final list of issues becomes outline for investigation.

**Step 3: Respondent's reply to each issue.**

- Obtain information from each respondent, listen to each tape, and review each document.
- All staff will document information collected in the customer contact (respondent area).
- After all respondent information is documented, complete the documentation (remaining steps).
- Determine the action taken.
- Follow up with the customer.
- **Note:** "Respondent" is not confined to the transit vehicle operator. "Respondent" is defined as any source of information that can contribute to the investigation, such as:
  - Operator (Interview/History)
  - Radio/Dispatch/DCC reports
  - GPS tracking software and programs
  - Maintenance (Staff/Records)
  - Witnesses
  - Complainant (Interview/History)
  - Spotter reports
  - Video (camera) and/or audio recordings
  - Incident reports (supervisor, transit police, fare/security inspectors)
  - Other VALLEYLIFE employees
  - Route history

**Step 4: Findings of fact.**

Investigate every "issue" (stated in the "statement of issues noted in step two). Separate facts from opinions.

**Step 5: Citations of pertinent regulations and rules.**



**Develop list of all regulations, rules, policies, and procedures that apply to the investigation:**

- Title VI requirements.
- Company rules and procedures.
- VALLEYLIFE policies and service standards.

**Step 6: Conclusions of law.**

- Compare each fact from "findings of fact" to the list of regulations, rules, etc.
- Make decision on whether violation(s) occurred.
- List of violations becomes "conclusions of Law."

**Step 7: Description of remedy for each violation.**

- Specific corrective actions for each violation found.
- Include plans for follow-up checks.
- Do not conclude report with "no action taken."
- If no violations found, conclude the report in a positive manner.
- Review policies and procedures.
- Review Title VI provisions.

#### **Response to Customer**

Detailed summary of conversation with customer. Send copy of letter to customer.

#### **Action Taken**

- Must include specific corrective action for each violation found.
- Include a follow-up action plan.
- If no violations found, note policies, procedures, etc. reviewed with operator.
- Never state "no action taken."

## Title VI Complaint Form – English

|   |                                      |   |
|---|--------------------------------------|---|
| <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 Section III.</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   |                                      |   |
| 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. |                                      |   |
| _____<br>_____<br>_____   |                                      |   |
| <b>Section VI:</b>  |                                      |   |
| Have you previously filed a Title VI complaint with this agency?  | <input type="checkbox"/> Yes         | <input type="checkbox"/> No                               |

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

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**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes      ☐ No

If yes, check all that apply:

☐ Federal Agency: \_\_\_\_\_

☐ Federal Court: \_\_\_\_\_ ☐ State Agency: \_\_\_\_\_

☐ State Court : \_\_\_\_\_ ☐ Local Agency: \_\_\_\_\_

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

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

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

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

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

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

**Section VI:**

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

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

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

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

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

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:

VALLEYLIFE

Vickie Pence, Human Resources Manager

1142 W. Hatcher Road

Phoenix, AZ 85021

(602) 331-2402

[vpence@valleylifeaz.org](mailto:vpence@valleylifeaz.org)

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

# Title VI Complaint Form – Spanish

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## 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) \_\_\_\_\_  
Sexo (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).**

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

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**¿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 \_\_\_\_\_ Corte Estatal \_\_\_\_\_ Corte Federal \_\_\_\_\_  
Agencia Local \_\_\_\_\_ Agencia Estatal \_\_\_\_\_

**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:**

VALLEYLIFE  
Human Resources Manager  
1142 W. Hatcher Road  
Phoenix, AZ 85021  
(602) 331-2402  
[info@valleylifeaz.org](mailto:info@valleylifeaz.org)

# Title VI Investigations, Complaints, and Lawsuits

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

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

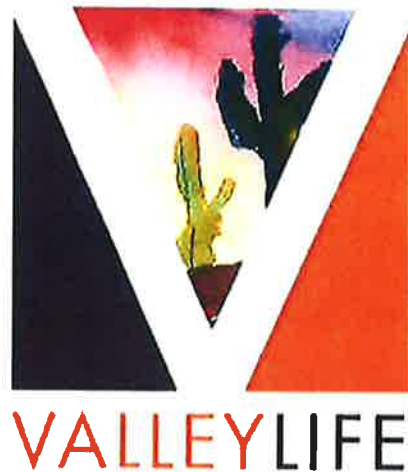
VALLEYLIFE has not had any Title VI complaints, investigations, or lawsuits in 2018

## Public Participation Plan

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# *VALLEYLIFE* *Public Participation* *Plan*

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Changing Lives. Creating Community.



**VALLEYLIFE does not serve the general public. VALLEYLIFE provides transit services solely to people who are enrolled in its programs. Individuals are referred to VALLEYLIFE programs through the Arizona Department of Economic Security/Division of Development Disabilities and Mercy Maricopa**

**However, we do attend provider fairs and other public venues where we distribute information about the programs and services we offer, which may include details about the transportation services we provide our Members.**

**VALLEYLIFE provides marketing and outreach to the community in the following ways:**

- **VALLEYLIFE participates in outreach via community partners, disability provider fairs and school transition fairs**
- **VALLEYLIFE provides a newsletter to our mailing list on a quarterly basis**
- **VALLEYLIFE belongs to a variety of local chambers and member organizations and associations**
- **VALLEYLIFE is engaged in a variety of social media platforms, including Facebook and Twitter**
- **VALLEYLIFE engages the media in stories and news coverage of our organization whenever possible**

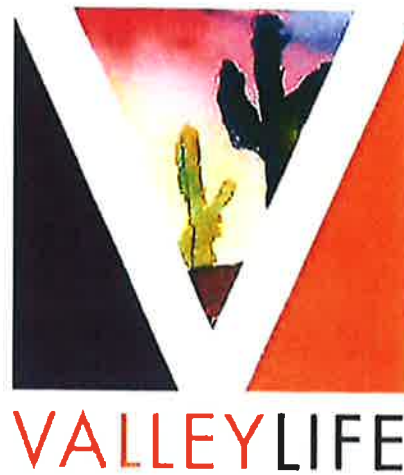
## Limited English Proficiency Plan

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# VALLEYLIFE

## *Limited English Proficiency Plan*

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Changing Lives. Creating Community.

For individuals who have Limited English Proficiency (both current Members and prospective Members), VALLEYLIFE provides the following alternatives to assist them:

- VALLEYLIFE has a very diverse Staff, with employees who are native speakers of other languages to act as contacts and translators for our Members who may require those services.
- VALLEYLIFE can, when necessary, provide its literature in an alternative language basis.
- VALLEYLIFE website utilizes Google Translator and can currently be translated into six languages: Afrikaans, Arabic, Greek, Portuguese, Spanish and Swahili.

VALLEYLIFE 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 VALLEYLIFE 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 VALLEYLIFE's extent of obligation to provide LEP services, VALLEYLIFE 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 VALLEYLIFE service area who may be served or likely to encounter by VALLEYLIFE program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with VALLEYLIFE services;
- 3) The nature and importance of the program, activities or services provided by VALLEYLIFE to the LEP population; and
- 4) The resources available to VALLEYLIFE and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

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

#### **Safe Harbor Provision**

VALLEYLIFE 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

#### **19 Limited English Proficiency Plan | Title VI Implementation Plan – September**

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**

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

## **Monitoring for Subrecipient Title VI Compliance**

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VALLEYLIFE does NOT monitor subrecipients for Title VI compliance.

## **Title VI Equity Analysis**

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A subrecipient 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.

VALLEYLIFE has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed.