Last Updated: April 2016

# Title VI Implementation Plan



Parker Community Senior Center

# **Contents**

Title VI Policy Statement	3
Title VI Notice to the Public	
Title VI Notice to the Public -Spanish	5
Title VI Complaint Procedures	Error! Bookmark not defined
Title VI Complaint Form	Error! Bookmark not defined
Title VI Investigations, Complaints, and Lawsuits	Error! Bookmark not defined
Public Participation Plan	ε
Limited English Proficiency Plan	14
Non-elected Committees Membership Table	17
Monitoring for Subrecipient Title VI Compliance	18
Title VI Equity Analysis	19
Fixed Route Transit Provider Analysis	Error! Bookmark not defined
Board Approval for the Title VI Program	20

# **Title VI Policy Statement**

The PARKER COMMUNITY SENIOR CENTER policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any PARKER COMMUNITY SENIOR CENTER sponsored program or activity. There is no distinction between the sources of funding.

PARKER COMMUNITY SENIOR CENTER 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, PARKER COMMUNITY SENIOR CENTER will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When PARKER COMMUNITY SENIOR CENTER distributes Federal-aid funds to another entity/person, PARKER COMMUNITY SENIOR CENTER will ensure all subrecipients fully comply with PARKER COMMUNITY SENIOR CENTER Title VI Nondiscrimination Program requirements. The DIRECTOR has delegated the authority to DARLA TILLEY, DIRECTOR, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Darla K. Tilley

DARLA TILLEY, DIRECTOR

#### Title VI Notice to the Public

# Notifying the Public of Rights Under Title VI PARKER COMMUNITY SENIOR CENTER

The PARKER COMMUNITY SENIOR CENTER operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the PARKER COMMUNITY SENIOR CENTER.

For more information on the PARKER COMMUNITY SENIOR CENTER's civil rights program, and the procedures to file a complaint, contact LYDIA LARA 928-669-9514, (TTY 928-669-9514); email SENIORSTAFF@TOWNOFPARKERAZ.US; or visit our administrative office at 1115 12TH ST., PARKER, AZ. For more information, visit HTTP://WWW.PARKERSENIORS.COM/

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: <u>ADOT</u>: ATTN: Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: 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 928-669-9514. Para información en Español llame: LYDIA LARA AT SENIORSTAFF@TOWNOFPARKERAZ.US

# Title VI Notice to the Public -Spanish

#### Aviso al Público Sobre los Derechos Bajo el Título VI PARKER COMMUNITY SENIOR CENTER

PARKER COMMUNITY SENIOR CENTER (y sus subcontratistas, si cualquiera) asegura complir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la PARKER COMMUNITY SENIOR CENTER's programa de derechos civiles, y los procedimientos para presentar una queja, contacte LYDIA LARA 928-669-9514, (TTY 928-669-9514); o visite nuestra oficina administrativa en 1115 12TH ST., PARKER, AZ. Para obtener más información, visite HTTP://WWW.PARKERSENIORS.COM/

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 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: AT THE PARKER COMMUNITY SENIOR CENTER OFFICES, OUR WEBSITE AND ON FLEET VEHICLES.

This notice is posted online at WWW.PARKERSENIORS.COM

# **Discrimination Complaint Procedures**

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **PARKER COMMUNITY SENIOR CENTER** including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination 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 ADA/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 PARKER COMMUNITY SENIOR CENTER 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 PARKER COMMUNITY SENIOR CENTER or submitted to the State or Federal authority for guidance.

**PARKER COMMUNITY SENIOR CENTER** will investigate Discrimination complaints against its subrecipients; all other Discrimination complaints filed against **PARKER COMMUNITY SENIOR CENTER** will be investigated by the Arizona Department of Transportation.

- (7) For Discrimination complaints filed against PARKER COMMUNITY SENIOR CENTER: Within 72 hours or 3 (three) calendar days of receipt, PARKER COMMUNITY SENIOR CENTER will notify ADOT of the Discrimination complaints being filed. The complaint will then be logged identifying its basis of discrimination, the status, and the next steps. ADOT then will assume jurisdiction and follow the ADOT's complaint procedures for investigating the complaint.
- (8) For Discrimination complaints filed against PARKER COMMUNITY SENIOR CENTER's subrecipients (ie, consultants, vendors, and contractors) PARKER COMMUNITY SENIOR CENTER will assume jurisdiction and will investigate and adjudicate the case.
- (9) The PARKER COMMUNITY SENIOR CENTER has 60days 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 60 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.
- (10) 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 or ADA 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.
- (11) A copy of either the closure letter or LOF must be also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
- (12) A complainant dissatisfied with PARKER COMMUNITY SENIOR CENTER decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: <u>ADOT</u>: ATTN ADA/Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

(13) A copy of these procedures can be found online at: www.parkerseniors.com.

If information is needed in another language, contact 928-669-9514. Para información en Español llame: LYDIA LARA 928-669-9514

MAKE SURE THE SENTENCE ABOVE IS ALSO PROVIDED IN ANY LANGUAGE(S) SPOKEN BY LEP
POPULATIONS THAT MEET THE SAFE HARBOR THRESHOLD

# **Discrimination Complaint Form**

Section I:					
Name:					
Address:					
Telephone (Home):	Telephone (W	ork):			
Electronic Mail Address:					
Accessible Format Requirements?	☐ Large Print		$\square$ Audio Tape		
Accessible Format Requirements:	☐ TDD		☐ Other		
Section II:					
Are you filing this complaint on your own behal	f?	□Yes*		□No	
*If you answered "yes" to this question, go to <b>S</b> e	ection III.				
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 par	rty:				
Please confirm that you have obtained the pern	nission of the	□Yes		□No	
aggrieved party if you are filing on behalf of a th	nird party.				
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
☐ Race ☐ Color ☐ Nationa	ıl Origin	□ Disal	oility		
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.					
Section VI:					
Have you previously filed a Discrimination compagency?	plaint with this	□Y€	es	□No	

If yes, please provide any reference information	ation regarding your previous complaint.
Section V:	
Have you filed this complaint with any other	r 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	er information that you think is relevant to your
complaint. Your signature and date are requ	iired below
Signature	 Date
Please submit this form in person at the add	ress below, or mail this form to:
Parker Community Senior Center Director	
1115 W 12th St, Parker, AZ 85344	
(928) 699-9514	

A copy of this form can be found online at www.parkerseniors.com

# Discrimination 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)				

X Parker Community Senior Center has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2015.

# PARKER COMMUNITY SENIOR CENTER Public Participation Plan



Parker Community Senior Center

PARKER COMMUNITY SENIOR CENTER 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, PARKER COMMUNITY SENIOR CENTER made the following community outreach efforts:

Parker Community Senior Center holds annual open forum discussions to hear the input, concerns and praise of our community and we make these hearings available to the public. We publish a monthly newsletter as a form of community outreach.

In the upcoming year PARKER COMMUNITY SENIOR CENTER will make the following community outreach efforts:

<u>Parker Community Senior Center plans on holding another public hearing for the year 2016 and we</u> intend to publish our monthly newsletter on an on-going basis.

#### **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.

PARKER COMMUNITY SENIOR CENTER 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, usually printed in the Parker Pioneer. If routes are changed, PCSC coordinates with other transit providers to inform the public as well as notifying the public via our website and at our Center.

# **Limited English Proficiency Plan**

# PARKER COMMUNITY SENIOR CENTER

Limited English Proficiency Plan



Parker Community Senior Center

PARKER COMMUNITY SENIOR CENTER 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 PARKER COMMUNITY SENIOR CENTER services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the PARKER COMMUNITY SENIOR CENTER's extent of obligation to provide LEP services, the PARKER COMMUNITY SENIOR CENTER 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 PARKER COMMUNITY SENIOR CENTER service area who may be served or likely to encounter by PARKER COMMUNITY SENIOR CENTER program, activities, or services; Our services include congregate meals, nutrition information and our Meals on Wheels program which all serve La Paz County.
- 2) The frequency with which LEP individuals come in contact with an PARKER COMMUNITY SENIOR CENTER services has been very infrequent given our service area;
- 3) The nature and importance of the program, activities or services provided by the PARKER COMMUNITY SENIOR CENTER to the LEP population; and helps us better serve our non-English speaking clients through La Paz County if requested. PCSC will provide iSpeak cards in order to link LEP individuals with the right translator.
- 4) The resources available to PARKER COMMUNITY SENIOR CENTER 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. Non-English speakers will be made aware of all informational documents available to them at our Center upon service and will be put into contact with a translator if needed.

#### **Safe Harbor Provision**

PARKER COMMUNITY SENIOR CENTER 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

<sup>\*\*</sup>For demographics on the ethnic make-up of the Town of Parker, where PCSC operates, please see attached demographic chart (FactFinder.Census.Org, 2014).

# **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	70%	30%	%	%	%
Senior Committee	80%	20%	%	%	%

Parker Community Senior Center does not discriminate on any basis, including but not limited to gender, race, ethnicity, age or socioeconomic status. We openly encourage members of our community to participate in our activities and planning and administration of said activities and have since our inception as an agency.

X PARKER COMMUNITY SENIOR CENTER does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Subrecipient Title VI Compliance

DESCRIBE HOW YOU MONITOR YOUR SUBRECIPIENTS. This can be through site visits, submissions of Title VI Plans annually, or training and surveys

X PARKER COMMUNITY SENIOR CENTER does NOT monitor subrecipients for Title VI compliance.

X PARKER COMMUNITY SENIOR CENTER does NOT currently have any sub recipients, so this section is N/A.

# **Title VI Equity Analysis**

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.

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

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives <u>any</u> FTA dollars, it must comply with this requirement.

The Parker Community Senior Center has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since N/A. \*Please delete this section if it does not apply to your agency. If it does, please delete the below text in this section.

# **Board Approval for the Title VI Program**

#### LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year

	Parker town, Arizona	
	Estimate	Margin
		of Error
Total:	2,817	+/-82
Speak only English	2,014	+/-174
Spanish or Spanish Creole:	738	+/-153
Speak English "very well"	477	+/-128
Speak English less than	261	+/-78
French (incl. Patois, Cajun):	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
French Creole:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Italian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Portuguese or Portuguese	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
German:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Yiddish:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other West Germanic	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Scandinavian languages:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Greek:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Russian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Polish:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Serbo-Croatian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other Slavic languages:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Armenian:	0	+/-13
Speak English "very well"	0	+/-13

Const. English less than	Io.	1./40
Speak English less than	0	+/-13
Persian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Gujarati:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Hindi:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Urdu:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other Indic languages:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other Indo-European	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Chinese:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Japanese:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Korean:	5	+/-8
Speak English "very well"	5	+/-8
Speak English less than	0	+/-13
Mon-Khmer, Cambodian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Hmong:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Thai:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Laotian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Vietnamese:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other Asian languages:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Tagalog:	6	+/-12
Speak English "very well"	6	+/-12
Speak English less than	0	+/-13
Other Pacific Island	7	+/-10
Speak English "very well"	7	+/-10
Speak English less than	0	+/-13
Navajo:		
	25	+/-28
Speak English "very well"	25 18 7	+/-28 +/-20

Other Native North American	22	+/-30
Speak English "very well"	22	+/-30
Speak English less than	0	+/-13
Hungarian:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Arabic:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Hebrew:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
African languages:	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13
Other and unspecified	0	+/-13
Speak English "very well"	0	+/-13
Speak English less than	0	+/-13

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year

#### **)N 5 YEARS AND OVER**