

Title VI Implementation Plan



Contents

Title VI Policy Statement.....	3
Title VI Notice to Public.....	4
Title VI Notice to the Public – Spanish.....	5
Title VI Complaint Procedures.....	6
Title VI Complaint Form.....	7
Title VI Investigations, Complaints, and Lawsuits.....	9
Public Participation Plan.....	10
Limited English Proficiency Plan.....	11
Non-elected Committee Members Table.....	12
Monitoring for Subrecipient Title VI Compliance.....	13
Title VI Equity Analysis.....	14
Fixed Route Transit Provider Analysis.....	15
Board Approval for the Title VI Plan.....	16

The Centers for Habilitation 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, 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, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any of The Centers for Habilitation sponsored programs or activities. There is no distinction between the sources of funding.

The Centers for Habilitation 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, The Centers for Habilitation will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

When The Centers for Habilitation distributes Federal-aid funds to another entity/person, The Centers for Habilitation will ensure all subrecipients fully comply with The Centers for Habilitation Title VI Nondiscrimination Program requirements. The President and Chief Executive Officer has delegated the authority to Kendell Gans, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Jeff Bernick, President and CEO

Title VI Complaint Procedures

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 TCH service, program or activity and believes the discrimination is based upon race, color or national origin may file a complaint with the Title VI Program Coordinator, in the Human Resources Office. Any complaint must be filed within 180 days of the alleged discriminatory act.

A complaint can be filed with The Centers for Habilitation by contacting Kendell Gans, Title VI Coordinator, at 480-838-8111 or you can complete the complaint form and mail it in.

Once a complaint is received it will be assigned and an investigation will be conducted. Appropriate action will be taken based on the findings of the investigation. The City of Phoenix, as the designated recipient of the Federal Funds for TCH, is responsible for monitoring this process.

A complainant may also be filed 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 North 1st Avenue, Suite 900, Phoenix, AZ 85003. FTA: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Avenue, SE Washington DC 20590.

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.

The Centers for Habilitation has NOT had any Title VI complaints, investigations, or lawsuits.

Public Participation Plan



The Centers for Habilitation/TCH is a referral – based organization and therefore does not conduct any advertising, marketing or public outreach to gain new clients. TCH services are provided to those clients that are qualified for services by the State of Arizona and promotes full and fair participation in transportation decision-making without regard to race, color or national origin. Transportation services are scheduled based on each person's needs.

TCH utilizes the following procedures to promote inclusion of all participants in transportation services:

- Each individual has an Individual Service Plan (ISP) that lists a person's services. This includes the programs they will attend, if they will be working and if transportation is supported. Any special requirements for transportation are recorded at this time. The ISP is reviewed two times per year and any changes are made at those meetings. The people involved in those meetings include the individual, their support/care givers, and staff. They are involved in any changes that may be made to any services, including transportation.
- If a regular route will be changed TCH will work one on one with clients, and their caregivers if they have one, to ensure there are no negative impacts for each client and that all of their needs are being met.
- If a destination is eliminated TCH will send out letters, to those clients affected by the change, hold 1:1 or community meetings to address any issues and solutions. These meetings are held in locations that are easy for each person to access. TCH has several employees that are bilingual to assist Spanish speaking families and we will hire an interpreter for those individuals with a hearing impairment as needed.

Limited English Proficiency Plan

The Centers for Habilitation

Limited English Proficiency Plan



TCH has adopted to follow the City of Phoenix LAP Plan. See attached policy.

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%

Describe the process the agency uses to encourage the participation of minorities on such committees should be included

The Centers for Habilitation does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

The Centers for Habilitation is a subrecipient of the City of Phoenix and does NOT monitor subrecipients for Title VI compliance.



Title VI Equity Analysis

Not applicable

Fixed Route Transit Provider Analysis

Not applicable

Board Approval for the Title VI Program

TCH Board:

Every year we apply for the City of Phoenix 5310 vehicle grant. In the past we have received 1 to 3 vehicles each year. In 2015 we created a Title VI Plan that was approved by the Board of Directors. That plan is required to be updated every three years. We have completed required changes and need to receive approval from the “Governing Body” of the organization (AKA our Board of Directors). We are asking each one of you to review and vote on the plan. The plan is based on a template, and has been reviewed with recommended updates, provided by the City of Phoenix.

On November 29th the TCH Board of Directors voted to approve the updated Title VI Plan at their monthly board meeting.