
Title VI Implementation Plan



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Title VI Policy Statement

Treasure House 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 Treasure House sponsored program or activity. There is no distinction between the sources of funding.

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

When Treasure House distributes Federal-aid funds to another entity/person, Treasure House will ensure all subrecipients fully comply with Treasure House Title VI Nondiscrimination Program requirements. The Chief Executive Officer has delegated the authority to Coley Schaan Amaro, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Laureen Tanner, Chief Executive Officer

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Treasure House

Treasure House 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 Treasure House.

For more information on Treasure House's civil rights program, and the procedures to file a complaint, contact Coley Schaan Amaro 602-714-8189 ext: 102, (TTY 711); email coley@treasurehouse.org; or visit our administrative office at 7815 W. Aspera Blvd Glendale, AZ 85308. For more information, visit www.treasurehouse.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 602-714-8189. Para información en Español llame: Michelle VanderPloegh.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Treasure House

Treasure House (*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 Treasure House's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Coley Schaan Amaro 602-714-8189 Ext: 102, (TTY 771); o visite nuestra oficina administrativa en 7815 W. Aspera Blvd. Glendale, AZ 85308. Para obtener más información, visite www.treasurehouse.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: The Treasure House administrative office located at 7815 W. Aspera Blvd. Glendale, AZ 85308, and all Treasure House 5310 funded vehicles

This notice is posted online at www.treasurehouse.org.

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 Treasure House 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 Treasure House 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 Treasure House or submitted to the State or Federal authority for guidance.
- (7) Treasure House will notify the of ALL Title VI complaints within 72 hours via telephone at 602-534-9161; email at Christina.hernandez@phoenix.gov.
- (8) Treasure House 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 Treasure House decision may file a complaint with the City of Phoenix (COP) or the Federal Transit Administration (FTA) offices of Civil Rights: **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

(11) A copy of these procedures can be found online at: www.treasurehouse.org

A sample can be provided upon request.

Title VI Complaint Form

Section I:		
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
Section II:		
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
Section III:		
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.		

Section VI:		
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.

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:

Treasure House, Title VI Coordinator/Operations Director

7815 W. Aspera Blvd.

Glendale, AZ 85308

602-714-8189

coley@treasurehouse.org

A copy of this form can be found online at www.treasurehouse.org

**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) _____

¿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).

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

¿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:

Treasure House, Title VI Coordinator/ Operations Director
7815 W. Aspera Blvd.
Glendale, AZ 85308
602-714-8189
coley@treasurehouse.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?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

Treasure House has not had any Title VI complaints, investigations, or lawsuits in 2018.

Public Participation Plan

Treasure House 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, Treasure House made the following community outreach efforts:

In the upcoming year Treasure House will make the following community outreach efforts:

- Expand the distribution of agency brochures
- Advertise public announcements through social media platforms
- Post the Nondiscrimination Public Notices in the following locations:
 - Lobby of agency
 - Treasure House website
- Update agency documents/publications to make them more user friendly

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.

Treasure House 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.

Limited English Proficiency Plan

Treasure House has adopted the following Limited English Proficiency Plan (LEP) through Valley Metro to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Treasure House 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.

1.0 INTRODUCTION

In 1993, the Valley Metro Regional Public Transportation Authority (RPTA) board adopted the name Valley Metro as the identity for the regional transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that serves more than 73 million riders annually. Valley Metro provides fixed route bus service, light rail service and complementary paratransit service across the region. Valley Metro distributes transit funds from the countywide transit sales tax to its member agencies including the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, and Maricopa County. For the most part, Valley Metro and its member agencies utilize service providers for operations of bus, light rail and paratransit services. The cities of Glendale, Scottsdale, Peoria, and Phoenix contract some of their service directly to service providers.

The regional transit system has 61 local bus routes, 15 key local bus routes, 1 limited stop peak and 2 limited stop all-day routes, 20 Express/RAPID routes, 18 community circulator routes, one rural connector route, and one light rail system for a total of 103 regional routes. Valley Metro provides Dial-a-Ride service for seniors and persons with disabilities, as well as ADA paratransit service for those who are unable to use fixed route bus service.

Valley Metro and the region supports the goal of the U.S. Department of Transportation (USDOT) limited English proficient (LEP) guidance to provide meaningful access to its services by LEP persons. The Federal Transit Administration (FTA) notes that transit agencies that provide language assistance to LEP persons in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from using the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

1.1 Regulatory Guidance

Title VI of the Civil Rights Act of 1964, provides that no person in the United States 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 program or activity that receives federal financial assistance.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” issued on August 11, 2000, directs each federal agency to publish guidance for its respective recipients in order to assist with its obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Providing English-only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

The FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, issued in October 2012 reiterates this requirement. Chapter III states that — FTA recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (page III-6).”

In the Phoenix Metropolitan Area, there are over seventy different languages identified in households where English is not the predominate language. Using the “Four Factor Analysis” prescribed by the FTA, this plan was developed to ensure that all transit providers effectively communicate with all users of the public transportation agency’s services provided.

1.2 Four Factor Analysis

The FTA Circular 4702.1B identifies four factors that recipients of federal funds should follow when determining what reasonable steps should be taken to ensure meaningful access for LEP persons.

The four-factor analysis involved the following:

1. Identify the number or proportion of LEP persons eligible to be served or likely to be encountered with transit service.
2. Determine the frequency with which LEP individuals come in contact with transit service.
3. Determine the nature and importance of transit service provided to LEP individuals.
4. Assess the resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

This document describes Valley Metro’s four-factor analysis and summarizes its LEP efforts, including staff training, followed by a description of how the plan will be monitored and updated.

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

The Factor 1 analysis assessed the number and proportion of persons with limited English speaking proficiency likely to be encountered within the service area, which is defined as a one-half mile radial buffer around all fixed route services. The LEP population is those individuals who reported to the Census Bureau that they speak English “less than very well.”

2.1 Evaluation Methods and Data Sources

In accordance with the FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the Valley Metro service area was completed through an analysis of several data sources, including:

- U.S. Census Bureau, Census 2000
- U.S. Census Bureau, 2013 American Community Survey (ACS) 5-Year Sample
- U.S. Census Bureau, 2016 American Community Survey (ACS) 5-year Sample

The U.S. Decennial Census 2010 data was not used, as the 2010 Census did not include language specific information on the census forms. The Census 2000 data provides some general information about language groups that is included below; though recognized to be 16 years old. Notably the demographic landscape has transformed since 2000, though this dataset provides a historical comparison and additional insight given the long form of Census 2000 provided more detailed sampling for population characteristics like language proficiency as compared to Census 2010 and the ACS, which is more of a random sample.

2.2 LEP Population Identification

FTA describes LEP persons as having a limited ability to read, write, speak, or understand English. For this LEP analysis, those who reported to the Census Bureau that they speak English “less than very well” were used to tabulate the LEP population for the transit service area.

Census 2000

U.S. Decennial Census 2000 provides information about English language proficiency within the Valley Metro service area. The census provides information on languages; recognizably this data is 16 years old and may not reflect the current state of the region. These data are available at the census block group and census tract level. There are 618 census tracts with one-half mile of fixed transit service. Figure 1 depicts the 2018 census tracts within Maricopa County. Census tracts encapsulated within the one-quarter mile buffer are also included in the estimates.

only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

The FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, issued in October 2012 reiterates this requirement. Chapter III states that — FTA recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (page III-6).”

In the Phoenix Metropolitan Area, there are over seventy different languages identified in households where English is not the predominate language. Using the “Four Factor Analysis” prescribed by the FTA, this plan was developed to ensure that all transit providers effectively communicate with all users of the public transportation agency’s services provided.

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 Treasure House’s extent of obligation to provide LEP services, the Treasure House 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 Treasure House service area who may be served or likely to encounter by Treasure House program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with a Treasure House services;
- 3) The nature and importance of the program, activities or services provided by the Treasure House to the LEP population; and
- 4) The resources available to Treasure House 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

Treasure House 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

Treasure House has chosen to adopt the City of Phoenix/Valley Metro Language Assistance Plan. Please see above document.

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.

Treasure House 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.

Treasure House does NOT monitor subrecipients for Title VI compliance.

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 any FTA dollars, it must comply with this requirement.

- The Treasure House has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since March 2018.

Board Approval for the Title VI Program

Board Resolution Attached.