
Title VI Implementation Plan

The Arizona Recreation Center
For the Handicapped



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Title VI Policy Statement

The Arizona Recreation Center for the Handicapped (ARCH) policy assures full compliance with Title VI of the Civil Rights act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related authorities and regulation 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 ARCH sponsored program or activity. There is no distinction between the sources of funding.

The Arizona Recreation Center for the Handicapped (ARCH) 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, ARCH will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When the Arizona Recreation Center for the Handicapped (ARCH) distributes Federal-aid funds to another entity/person, ARCH will ensure all subrecipients fully comply with ARCH’s Title VI Nondiscrimination Program requirements. The President of the Board of Directors has delegated the authority to Vera Martinez, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Cynthia Bennett

10/12/18

Cynthia Bennett, President, ARCH Board of Directors

Date

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI The Arizona Recreation Center for the Handicapped (ARCH)

The Arizona Recreation Center for the Handicapped (ARCH) hereby gives public notice that is the policy of the agency to ensure full compliance with the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related authorities and regulation in all programs and activities. Title VI requires that no person in the United States of America 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 for which ARCH received federal financial assistance.

Any person who believes they have experienced discrimination under Title VI may file a complaint with the Arizona Recreation Center for the Handicapped (ARCH). Any such complaint must be filed with ARCH's Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. For more information, or to file a complaint, contact Vera Martinez at 602-230-2226, email: vera_martinez@archaz.org, or visit our website at www.archaz.org, TTY: 7-1-1.

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 602-230-2226 or 602-230-7193. Para información en Español llame: Azucena Carrillo at 602-230-2226 or 602-230-7193.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI ARIZONA RECREATION CENTER FOR THE HANDICAPPED (ARCH)

Arizona Recreation Center for the Handicapped (ARCH) (*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 Arizona Recreation Center for the Handicapped's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Vera Martinez at 602-230-2226, (TTY by Arizona Relay Service 7-1-1); o visite nuestra oficina administrativa en 1550 West Colter Street, Phoenix, AZ 85015. Para obtener más información, visite www.archaz.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: Front office/common office of the ARCH facility, and the agencies website.

This notice is posted online at www.archaz.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 the Arizona Recreation Center for the Handicapped (ARCH) 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.

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.

- (1) 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.
- (2) 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.
- (3) 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.
- (4) 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.
- (5) Once submitted ARCH 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 ARCH or submitted to the State or Federal authority for guidance.
- (6) ARCH 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
- (7) ARCH 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.

(8) 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.

(9) A complainant dissatisfied with ARCH'S 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

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

Title VI complaints may be filed by any of the following methods:

To submit a complaint online, fill out the "Online Complaint Form".

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

Arizona Recreation Center for the Handicapped (ARCH)

1550 West Colter Street

Phoenix, Arizona 85015

Email: Vera_Martinez@archaz.org Phone: 602-230-2226 Fax: 602-230-0308 TTY: 7-1-1

Forms are available at the physical address listed above if access to a computer is not available.

Complaints received by ARCH's Title VI Coordinator will be assigned to 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, the Coordinator will respond to the complaint within a reasonable time and, if warranted by the investigation, will initiate appropriate action. The City of Phoenix, as the designated recipient of federal funds for this region, is responsible for monitoring this process.

To request information about ARCH's Title VI Policy, please contact the Coordinator via email at Vera_Martinez@archaz.org or by phone at 602-230-2226 or fax at 602-230-0308. To request information in alternate formats, please contact ARCH at 602-230-7193, TTY: Arizona Relay Service 7-1-1

Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
E- 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 are filing on behalf of 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. List 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:
Arizona Recreation Center for the Handicapped (ARCH), Title VI Coordinator
1550 West Colter Street
Phoenix, Arizona 85015
Phone: 602-230-2226 Fax: 602-230-0308
Vera_Martinez@archaz.org

A copy of this form can be found online at www.archaz.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 rabajo): _____

Persona A La Que Se Discriminó (alguien que no sea la persona que está poniendo laueja)

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 _____ Agencia Local _____ Agencia Estatal _____

Corte Estatal _____ Corte Federal _____

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:

Arizona Recreation Center for the Handicapped (ARCH) Title VI Program

Vera Martinez

Title VI Program Coordinator

1550 West Colter Street

Phoenix, AZ 85015

Phone: 602-230-2226

Fax: 602-230-0308

Vera_Martinez@archaz.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)				

The Arizona Recreation Center for the Handicapped (ARCH) has not had any Title VI complaints, investigations, or lawsuits in 2020.

Public Participation Plan

Arizona Recreation Center for the Handicapped

Public Participation Plan



The Arizona Recreation Center for the Handicapped (ARCH) 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, ARCH has made the following community outreach efforts:

- Quarterly Electronic Newsletters
- Monthly E-Mail Blasts
- Quarterly Community Information Fairs
- Corporate Information Fairs
- Social Media (i.e. Facebook, Twitter, etc.)
- Public website
- Quarterly Flyer dissemination to area middle schools and high schools
- Semi-Annual Mass Mailings
- “Kids on the Block” community awareness program

In the upcoming year The Arizona Recreation Center for the Handicapped (ARCH) will make the following community outreach efforts:

Please see the above list.

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.

The Arizona Recreation Center for the Handicapped (ARCH) 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

Arizona Recreation Center for the Handicapped

Limited English Proficiency Plan



The Arizona Recreation Center for the Handicapped (ARCH) 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 ARCH's 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 ARCH's extent of obligation to provide LEP services, the Arizona Recreation Center for the Handicapped 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 Arizona Recreation Center for the Handicapped service area who may be served or would be likely to encounter the Arizona Recreation Center for the Handicapped programs, activities, or services;
- 2) The frequency with which LEP individuals come in contact with The Arizona Recreation Center for the Handicapped services;
- 3) The nature and importance of the program, activities or services provided by the Arizona Recreation Center for the Handicapped to the LEP population; and
- 4) The resources available to the Arizona Recreation Center for the Handicapped 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. These will include, but not be limited to:

- Training bilingual staff to act as interpreters and translators
- Information sharing through common industry groups
- Translating vital documents posted on our website
- Pooling resources to reduce translation needs
- Offer written translations of description of documents
- Provide list of resources for translation in languages other than those identified by demographic analysis.

Safe Harbor Provision

The Arizona Recreation Center for the Handicapped (ARCH) 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

Note: *The Arizona Recreation Center for the Handicapped (ARCH) has chosen to adopt the City of Phoenix/Valley Metro Language Assistance Plan. Please see the attached document.*

Non-elected Committees Membership Table

A sub-recipient 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. Sub-recipients 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 THE NAME OF THE COMMITTEE HERE	%	%	%	%	%
TYPE THE NAME OF THE COMMITTEE HERE	%	%	%	%	%
TYPE THE NAME OF THE COMMITTEE HERE	%	%	%	%	%

The Arizona Recreation Center for the Handicapped (ARCH) does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Sub-recipient Title VI Compliance

The Arizona Recreation Center for the Handicapped (ARCH) does NOT monitor sub-recipients for Title VI compliance.

Title VI Equity Analysis

A sub-recipient 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 sub-recipient organization receives any FTA dollars, it must comply with this requirement.

The Arizona Recreation Center for the Handicapped (ARCH) has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since 2002.

Board Approval for the Title VI Program



BOARD OF DIRECTORS

Board of Directors Meeting		
12/12/2018	6:00pm	ARCH 1550 W. Colter St. Phoenix, AZ
Purpose	December Board of Directors Meeting	
Secretary	Janice Guckenberger	
Officers	Cynthia Bennett, Richard Lustiger, Susan Caldwell, Janice Guckenberger	
Attendees	Board: Cynthia Bennett, Richard Lustiger, Susan Caldwell, Mary Watkins, Janice Guckenberger, Frank Rosales, Larry Wissler Non-Board: Kip Murray, Executive Director Vera Martinez, Programs Director	
Absent	Excused: Ralph May	
TITLE VI Implementation Plan		
New Business	Vera Martinez, Programs Director	
Discussion	Vera presented the history of the Title VI plan relating to non-discrimination and LEP concerns, along with changes to the wording used in the new updated plan. New Board members were apprised of the necessity of the plan. A review of the revised plan was discussed and clarifications were made.	
Conclusion	A motion to accept the plan was put forth by Richard and seconded by Frank. The motion carried unanimously.	
Action Items	Person Responsible	Deadline
No action needed as all errors corrected from last review. Noted ADA deletions	N/A	12-13-18
Closing		
Cynthia Bennett	Cynthia adjourned the meeting at 7:55pm	
The next Board meeting is scheduled for 6:00pm on Wednesday, January 9, 2019 at ARCH		
Submitted by: Janice Guckenberger	December 13, 2018	Email/Fax

This is an excerpt of the draft minutes from the November 18th Board of Directors meeting.