# City of Phoenix Public Transit Department



### October 27, 2021

**5307 Subrecipient Training** 

Title VI Requirements (FTA Cir. 4702.1B)

# **Training Objective**

Do you know?

- Program
   Requirements
- Title VI Template
- What's New
- Subrecipient Triennial Program Plan Due Dates

### Intro to Title VI

# FTA Title VI Circular 4702.1B Effective October 1, 2012

The revised regulation includes an Environmental Justice component

### **Title VI Disclosure**

**Title VI prohibits discrimination** by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited **English proficient (LEP) persons** 

### **Title VI Program Plan Overview**

### City of Phoenix Public Transit is the Designated Recipient of federal funds for the Phoenix/UZA region

### **Oversight of 60 subrecipients;**

**Transit Region Partners (14)** 

**Non-Profit Agencies (46)** 

### **Title VI Program Plan Overview**

City of Phoenix provides oversight & monitoring for all regional subrecipients

**Collect Title VI program plans** 

**Conduct Title VI program review** 

**Conduct Title VI compliance oversight** 

**Offer technical assistance** 

Review program requirements & provide concurrence memos

Disclose Title VI Public Notice and identify the location(s) of postings; Must post in all FTA funded vehicles

**Title VI Complaint Procedures** 

**Title VI Complaint Forms** 

All notices are required to be posted to the agency website and must be English & Spanish

Provide a list of Title VI Investigations, Lawsuits, and Complaints

Provide evidence the Title VI plan has been approved by the local governing body

# **Develop Public Participation Plan** (can adopt Valley Metro's plan)

Develop Language Assistance Plan for persons with limited English proficiency (can adopt Valley Metro's plan)

Identify racial and ethnic diversity of non-elected committees and councils.

Develop a plan for monitoring subrecipients, if applicable.

Determination of site or location of facilities

## **Title VI Program Template**

### Title VI Program Guidance

The following information is provided for guidance purposes only. For further guidance see Federal Transit Administration (FTA) Circular 4702.1B. If the subrecipient agency chooses to utilize this document in preparation of their Title VI Program plan, please ensure that all sections are specifically updated to reflect the subrecipient's policies and procedures.

Additionally, subrecipients must certify that the policies and procedures listed in this plan will be implemented. Compliance Audits and/or field reviews by the *City of Phoenix Public Transit Compliance* Division will be conducted based on the subrecipients compliance with the submitted Title VI Program plan.

\*Delete the Title VI Program Guidance page at the time of final plan submission. Please address all areas of the checklist prior to final plan submission. Please delete all instructional language that is underlined and italicized prior to plan submittal. Remove all template yellow and gray highlights prior to final plan submission.

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This Checklist has been created to assist you with incorporating the required program plan elements of your Title VI Plan, per FTA C 4102.1B Chapter III.

Title VI Program Plan Requirements – FTA Circular 4102.1 B - Chapter III	Primary Recipient – City of Phoenix	5310 Subrecipients
Cover Page	Required	Required
Table of Contents	Required	Required
Signed Title VI Assurance	Required	Required
Notice to the Public	Required	Required
Complaint Procedures	Required	Can use Primary's
Complaint Form	Required	Can use Primary's
Public Participation Plan	Required	Can use Primary's
Language Assistance Plan	Required	Can use Primary's
List of Complaints	Required	Required
Non-elected Transit Boards, Committees, Councils w/Racial Makeup	Required	Required
Facility Title VI Equity Analysis	Required	Required
Monitoring for Subrecipient Title VI Compliance	Required	Required
Governing Body Approval of Title VI Plan (Board of Directors)	Required	Required
Civil Rights Website Compliance	Required	Required

# **Title VI Program**

*Title VI Implementation Plan* 

**[Optional]** Insert town/agency picture here

Enter 3-year plan implementation dates (Ex: December 1, 2018-November 30, 2021)

### Title VI Program Policy Statement

### Title VI Policy Statement

The TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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 TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE sponsored program or activity. There is no distinction between the sources of funding.

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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, TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE distributes Federal-aid funds to another entity/person, TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE will ensure all subrecipients fully comply with TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE Title VI Nondiscrimination Program requirements. The TITLE OF HIGHEST RANKING OFFICIAL has delegated the authority to TYPE AGENCY PERSON RESPONSIBLE FOR TITLE VI, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

#### NAME AND TITLE OF HIGHEST RANKING OFFICAL

### Title VI Program Public Notice

### Title VI Notice to the Public

### Notifying the Public of Rights Under Title VI TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE

The TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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 the TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE.

For more information on the TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE's civil rights program, and the procedures to file a complaint, contact TYPE TITLE VI CONTACT PERSON TYPE TITLE VI CONTACT PERSON PHONE NUMBER HERE, (TTY TYPE YOUR TTY NUMBER HERE); email TYPE TITLE VI PERSONS EMAIL HERE; or visit our administrative office at TYPE YOUR ADDRESS HERE. For more information, visit TYPE YOUR WEB ADDRESS HERE

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 TYPE ALTERNATE LANGUAGE PHONE NUMBER HERE. Para información en Español Lange; TYPE NAME AND CONTACT INFORMATION HERE

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

### Title VI Program Spanish Public Notice

### Title VI Notice to the Public -Spanish

### Aviso al Público Sobre los Derechos Bajo el Título VI TYPE YOUR AGENCY/TRANSITPROVIDERNAME HERE

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE (y sus subcontratistas, si cualquiera) asegura complir 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 pais de origen.

Para obtener más información sobre la TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE's programa de derechos civiles, y los procedimientos para presentar una queja, contacte TYPE TITLE VI CONTACT PERSON TYPE TITLE VI CONTACT PERSON PHONE NUMBER HERE, (TTY TYPE YOUR TTY NUMBER HERE); o visite nuestra oficina administrativa en TYPE YOUR ADDRESS HERE. Para obtener más información, visite TYPE YOUR WEB ADDRESS HERE

El puede presentar una queja directamente con City of Phoenix Public Transit Department <u>o</u> 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

The above notice is posted in the following locations: TYPE HERE WHERE THE NOTICE IS POSTED. At a minimum it must be posted online and in the public areas of the agency's/transit provider's office(s). This notice should also be posted at stations, stops, and on transit vehicles

This notice is posted online at TYPE URL HERE

### **Title VI Complaint Procedures**

**[INSTRUCTIONS]** The City of Phoenix has several templates that your agency may use. Please request the templates through the Title VI Coordinator. Should the agency choose to develop their own procedures the reporting requirements must meet 49 CFR Section 21.9 (b). Procedures must aide in investing and tracking Title VI complaints files against them. Procedures and complaint forms must be made available on the agencies website.

#### **Title VI Complaint Procedures**

#### What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 which requires 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 subjected to discrimination under any program or activity receiving federal financial assistance."

#### How do I file a complaint?

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 Valley Metro or City of Phoenix service, program or activity, and believes the discrimination is based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service or directly with the City of Phoenix. This antidiscrimination protection also extends to the activities and programs of Valley Metro's and City of Phoenix's third-party Transit Service Provider (TSP) contractors. Valley Metro and the City of Phoenix use the Customer Assistance System (CAS) to capture all complaints received for the regional transit system. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

To submit a complaint online, complete the online complaint form at the following link: <a href="http://www.valleymetro.org/form/title-vi-complaint-form">www.valleymetro.org/form/title-vi-complaint-form</a>

Complaints can also be submitted in writing using the Title VI complaint form, or by calling Customer Service at (602) 253-5000, TTY: (602) 251-2039. Completed and signed forms should be mailed to:

Regional Public Transportation Authority 4600 East Washington Street, Suite 101 Phoenix, AZ 85034 Email: <u>csr@valleymetro.org</u> Phone: (602) 253-5000 TTY: (602) 251-2039

The compliant form is located on our website: https://www.valleymetro.org/about/civil-rights

To file a complaint directly with the City of Phoenix:

Attention: Title VI Coordinator City of Phoenix Public Transit Department 302 N. 1st Avenue, Suite 900 Phoenix, AZ 85003 Email: <u>PHXTransitEO@phoenix.gov</u> Phones: (602) 262-7242 <u>https://www.phoenix.gov/publictransit/title-vi-notice</u>

Individuals may also file complaints directly with the Federal Transit Administration (FTA) within the 180-day timeframe:

Federal Transit Administration (FTA) Attention: Title VI Coordinator East Building, 5th Floor –TCR 1200 New Jersey Avenue, SE Washington, D.C. 20590

#### Customer Service

Complaints received by Valley Metro Customer Service representatives or by the City of Phoenix Title VI Coordinator will be documented and assigned to the appropriate Transit Service Provider (TSP) (operator or administrator of the service) responsible for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). The TSP has 30 days to investigate each complaint. If more information is needed to resolve the case, the TSP may contact the complainant and request additional information. Complainants must provide additional information within 10 days of the request or the complaint may be deemed undeterminable and will be administratively closed. Cases may also be administratively closed if a complainant. Requests to close a complaint can be requested by phone, email or in writing (see contact information above). Complainants may be administratively closed for non-responsiveness by the complainant.

Following the investigation, all complaints shall be concluded with a determination entered in the CAS system. The determination entry shall state the investigation determined the complaint was valid<sup>1</sup>, invalid<sup>2</sup>, or undeterminable<sup>3</sup>. If the investigation determines the alleged Title VI complaint violations of race, color or national origin discrimination are valid, a detailed corrective resolution to remedy the situation shall be provided to the complainant. If the investigation results determine there was no alleged Title VI discrimination based on race, color or national origin, the case will be closed. The complainant shall be notified of the investigation results in the manner identified (email or phone). A complainant can appeal the decision within 60 days of notification of the investigation results. Appeals must be submitted to Valley Metro or the City of Phoenix.

All Title VI complaints and investigations are reviewed by Valley Metro, the Customer Service Administrator (CSA), and City of Phoenix staff.

For more information on Valley Metro's Title VI Program and procedures by which to file a complaint, contact the Title VI Coordinator at (602) 322-4514.

For more information on the City of Phoenix's Civil Rights Program and the procedures by which to file a complaint, contact the Title VI Coordinator at (602) 262-7242.

<sup>&</sup>lt;sup>1</sup> Valid: fact based, binding, acceptable, enforceable

<sup>&</sup>lt;sup>2</sup> Invalid: null and void, unacceptable, unenforceable

<sup>&</sup>lt;sup>3</sup> Undeterminable: incapable of being decided, settled, or fixed; not determinable

#### Requesting Information

Note: To request information in alternative formats, please contact Customer Service at <u>csr@valleymetro.org</u> or phone: (602) 253-5000 or City of Phoenix (602) 262-7242, TTY: (602) 251-2039

#### Tracking a Title VI Compliant

As complaints are received, they are logged into the CAS system. Within 24 to 48 hours of logging the complaint, Valley Metro CSA assigns the complaint to the appropriate TSP for investigation and documentation.

The TSP has 30 days to complete their investigation, including obtaining additional information needed from the complainant to investigate or to resolve the case. The investigator will follow the complaint process, and once the investigation is concluded, the case resolution will be documented in the CAS.

The CAS system is programmed to notify the CSA if a complaint has not been responded to within the required time frame. Upon system notification, the CSA will send out a reminder notice to the appropriate TSP that the case is not yet resolved or closed out.

Once the case has been resolved the complainant will receive a response in the manner identified.

Valley Metro and the City of Phoenix monitors the process monthly to ensure Title VI complaints are fully investigated, adequately documented, and that the complainant was responded to in the manner requested. Should an inaccuracy be found, Valley Metro and/or the City of Phoenix will work with CSA and the appropriate TSP to reopen the complaint for further investigation until resolution or completion.

#### Investigating a Title VI Complaint

Each documented Title VI investigative report must address each of the "Five Federal Investigative" steps found in 28 CFR, Part 35 and FTA Circular 4702.IA. The seven steps are:

STEP ONE: The TSP will review the complaint information entered into CAS by Valley Metro Customer Service staff. Any new issues identified during the investigation should also be documented in CAS.

STEP TWO: Interviews and collections of facts.

- TSP identifies respondents to interview, if needed.
- TSP interviews respondents identified and documents details from the interviews in CAS.
- Investigate every "issue" (stated in the "statement of issues noted in step one).
- Separate facts from opinions.

"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:

- Complainant
- Operator

- Radio/Dispatch/OCC reports
- Maintenance staff
- City Transit staff
- Witnesses
- Other transit employees

The TSP identified, collects, and reviews other information and/or documents that provide facts for the investigation. Any applicable information is to be documented in CAS. Documents to review can include:

- GPS tracking software and programs
- Maintenance records
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Route history
- Other documents deemed appropriate by the TSP

STEP THREE: TSP documents pertinent regulations, rules, policies, and procedures that apply to the investigation in CAS under the case number assigned.

Pertinent regulations, rules, policies, and procedures may include:

- Title VI requirements
- Company rules and procedures
- Valley Metro and City of Phoenix policies and service standards
- Contractual requirements

STEP FOUR: Complaint Determination.

- TSP compares each fact from "findings of fact" to the list of regulations, rules, etc.
- TSP makes a fact-based determination of alleged violation(s).

STEP FIVE: Description of resolution for each valid violation.

- TSP describes specific corrective actions for each violation found
- TSP documents follow-up action, if applicable
- TSP documents the complaint resolution in CAS

TSP Complaint Resolution(s):

- Must include specific complaint resolutions for each valid violation noted.
- Document a follow-up action plan, where applicable.
- If no valid violations are found, note policies, procedures, etc. reviewed during the investigation and withtransit operator.
- Documented complaint information should always include staff initials, title, and dates.

#### Response to Customer

TSP will respond to the Customer in the manner identified and will document the response provided in CAS under the case number assigned.

### **Title VI Program Complaint Form**

### Title VI Complaint Forms

#### TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at car@valleymetro.org.

SECTION 1: CUSTOMER INFORMATION		
First Name:	Last Name:	
Address:		
City:	State: Zip:	
Home Phone:	Cell Phone:	
Email:	Preferred method of contact: Phone	Email

#### SECTION 2: INCIDENT INFORMATION

AM PM City:\_ Time of Incident: Date of Incident:

Direction of Travel:

Incident Location: Route #: Bus/Light Rail/Streetcar #:\_\_\_

Service Type: Clocal Bus Clexpress/RAPID Circulator/Connector Clight Rail Streetcar Dial-a-Ride Operator Name:\_\_\_

Operator Description:

What was the discrimination based on (Check allthat apply): Race Color National Origin Cother

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? Yes No. If yes, please provide information about a contact person at the FTA where the complaint was filed: Name: Title:

Address:

Phone:

Have you previously filed a Title VI complaint with this agency? Yes No Signature and date required below:

Signature Date



## Title VI Program Template Spanish Complaint Form

#### FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) é por correo electrónico a cargevaleymetro org.

#### SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre:	Apellido:	
Domicilio:		
Ciudad:	Estado:	Código Postal:
Teléfono del Hogar:	Teléfono Celular:	
Correo Electrónico:	Método preferido de contacto: 1	Teléfono Correo Electrónico

#### SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente:	Hora del Incidente:	AM PM_Ciudad:
Ubicación del Incidente:		Dirección del Viaje:
Ruta #:	Autobús/T	ren Ligero/Tranvía #:
Tipo de Septicio∏Autobuis L	acal C Everess/RARID Circuit	vior/Conector Tree Linero Traquía DieLa Rida

Tipo de Servicio\_Autobús Local\_ Express/RAPID\_ Circuladon/Conector\_ Tren Ligero\_ Tranvia Dial-a-Ride Nombre del/la Operador/a:\_\_\_\_\_

Descripción del/la Operador/a:\_\_\_\_

¿En qué se basó la discriminación? (Margue todo lo que sea aplicable):

Raza Color Origen Nacional Otro

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

, Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? □ Sí □ No Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre:\_\_\_\_\_\_\_Título:\_\_\_\_\_\_\_Título:\_\_\_\_\_\_\_

Teléfono:

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? □ Sí □ No Firma y fecha requeridas abajo:

Firma\_\_\_\_ Fecha



[INSTRUCTIONS] Your agency may adopt the City of Phoenix/Valley Metro Title VI Complaint Forms above, or you may use your own agency complaint forms. Should choose to use your agency's forms, must include the complainant's name, race, ethnicity, name all origin, the nature of the complaint, the dates of the complaint, requested action, and contact information.

## Title VI Program Investigation, Complaints, Lawsuits

### 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.

Name and/or Case Number	Date Case Filed (Month, Day, Year)	Case Summary (include basis of complaint: ex. race, color, national origin)	Case Status/ Response	Case Resolution Action
Investigations		•		
Lawsuits				
Complaints				

TYPE AGENCY NAME HERE has not had any Title VI complaints, investigations, or lawsuits in TYPE YEAR HERE.

### Title VI Program Public Participation

**Public Participation Plan** 

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE Public Participation Plan

**[Optional]** Insert town/agency picture here [INSTRUCTIONS] A Public Participation Plan or process is a document which explicitly describes proactive strategies, procedures, and desired outcomes that underpin the recipient's participation activities. Your agency has wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Your agency should make your analysis based on a demographic analysis of the populations affected, the type of plan, program and/or service under consideration, and the resources available. If you have any questions or concerns while building your Public Participation Plan, please contact the City of Phoenix Public Transit Department at 602.262.4507 and ask to speak with the Title VI Coordinator.

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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, TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HEREmade the following community outreach efforts:

List all public meetings or public hearings that the agency conducts. List all publications, public announcements. Include frequency

In the upcoming year TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE will make the following community outreach efforts:

List all upcoming public meetings or public hearings that the agency will conduct. Include frequency.

#### 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.

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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.

### Title VI Program Public Participation

A statement in <u>(Spanish or specific language per your community make up</u>) will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested. <u>(List all other efforts to provide services to LEP individuals)</u>

#### Safe Harbor Provision

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE 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

## Title VI Program Non-Elected Committee Table

### 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. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

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 <mark>%</mark>	TYPE % HERE <mark>%</mark>	TYPE % HERE%	TYPE % HERE <mark>%</mark>	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE <mark>%</mark>	TYPE % HERE <mark>%</mark>	TYPE % HERE%	TYPE % HERE <mark>%</mark>	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%

Table Depicting Membership of Committees, Councils, Broken Down by Race

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

TYPE AGENCY NAME HERE does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Title VI Program Subrecipient Monitoring

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

**XX** does NOT monitor subrecipients for Title VI compliance.

### Title VI Program Equity Analysis

### **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 <u>any</u> FTA dollars, it must comply with this requirement.

The TYPE AGENCY NAME has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since DATE SINCE LAST FACILITY WAS BUILT. \*Please delete this section if it does not apply to your agency. If it does, please delete the below text in this section.

#### A. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Additionally, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

This document is an analysis of TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE's planned TYPE PROPOSED MONTH/YEAR OF AGENCY COMPLETION TYPE AGENCY HERE (Facility Construction Only)

#### B. Background

DESCRIBE THE AGENCY(why it was proposed, the projected benefits of the project, etc.)

C. Analysis

For facilities covered by this provision, recipients are required to:

1) Complete a Title VI equity analysis during the planning state with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.

# Title VI Program Template Governing Board Approval

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

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

## Title VI Program What's New?

**Did you** know all recipients must disseminate information to the public on the agency website?

- Complaint Process
- Complaint Forms
- Annual Title VI Report due every October 15<sup>th</sup>
- Subrecipient Due Dates
- Valley Metro LAP 2021
- Valley Metro Public Participation Plan 2021

#### **Title VI Complaint Procedures**

#### What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 which requires 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 subjected to discrimination under any program or activity receiving federal financial assistance."

#### How do I file a complaint?

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 Valley Metro or City of Phoenix service, program or activity, and believes the discrimination is based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service or directly with the City of Phoenix. This antidiscrimination protection also extends to the activities and programs of Valley Metro's and City of Phoenix's third-party Transit Service Provider (TSP) contractors. Valley Metro and the City of Phoenix use the Customer Assistance System (CAS) to capture all complaints received for the regional transit system. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

To submit a complaint online, complete the online complaint form at the following link: www.valleymetro.org/form/title-vi-complaint-form

Complaints can also be submitted in writing using the Title VI complaint form, or by calling Customer Service at (602) 253-5000, TTY: (602) 251-2039. Completed and signed forms should be mailed to:

Regional Public Transportation Authority 4600 East Washington Street, Suite 101 Phoenix, AZ 85034 Email: <u>csr@valleymetro.org</u> Phone: (602) 253-5000 TTY: (602) 251-2039

The compliant form is located on our website: https://www.valleymetro.org/about/civil-rights

To file a complaint directly with the City of Phoenix:

Attention: Title VI Coordinator City of Phoenix Public Transit Department 302 N. 1st Avenue, Suite 900 Phoenix, AZ 85003 Email: <u>PHXTransitEO@phoenix.gov</u> Phones: (602) 262-7242 <u>https://www.phoenix.gov/publictransit/title-vi-notice</u>

Individuals may also file complaints directly with the Federal Transit Administration (FTA) within the 180-day timeframe:

Federal Transit Administration (FTA) Attention: Title VI Coordinator East Building, 5th Floor –TCR 1200 New Jersey Avenue, SE Washington, D.C. 20590

#### Customer Service

Complaints received by Valley Metro Customer Service representatives or by the City of Phoenix Title VI Coordinator will be documented and assigned to the appropriate Transit Service Provider (TSP) (operator or administrator of the service) responsible for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). The TSP has 30 days to investigate each complaint. If more information is needed to resolve the case, the TSP may contact the complainant and request additional information. Complainants must provide additional information within 10 days of the request or the complaint may be deemed undeterminable and will be administratively closed. Cases may also be administratively closed if a complainant. Requests to close a complaint can be requested by phone, email or in writing (see contact information above). Complainants may be administratively closed for non-responsiveness by the complainant.

Following the investigation, all complaints shall be concluded with a determination entered in the CAS system. The determination entry shall state the investigation determined the complaint was valid<sup>1</sup>, invalid<sup>2</sup>, or undeterminable<sup>3</sup>. If the investigation determines the alleged Title VI complaint violations of race, color or national origin discrimination are valid, a detailed corrective resolution to remedy the situation shall be provided to the complainant. If the investigation results determine there was no alleged Title VI discrimination based on race, color or national origin, the case will be closed. The complainant shall be notified of the investigation results in the manner identified (email or phone). A complainant can appeal the decision within 60 days of notification of the investigation results. Appeals must be submitted to Valley Metro or the City of Phoenix.

All Title VI complaints and investigations are reviewed by Valley Metro, the Customer Service Administrator (CSA), and City of Phoenix staff.

For more information on Valley Metro's Title VI Program and procedures by which to file a complaint, contact the Title VI Coordinator at (602) 322-4514.

For more information on the City of Phoenix's Civil Rights Program and the procedures by which to file a complaint, contact the Title VI Coordinator at (602) 262-7242.

<sup>&</sup>lt;sup>1</sup> Valid: fact based, binding, acceptable, enforceable

<sup>&</sup>lt;sup>2</sup> Invalid: null and void, unacceptable, unenforceable

<sup>&</sup>lt;sup>3</sup> Undeterminable: incapable of being decided, settled, or fixed; not determinable

#### Requesting Information

Note: To request information in alternative formats, please contact Customer Service at <u>csr@valleymetro.org</u> or phone: (602) 253-5000 or City of Phoenix (602) 262-7242, TTY: (602) 251-2039

#### Tracking a Title VI Compliant

As complaints are received, they are logged into the CAS system. Within 24 to 48 hours of logging the complaint, Valley Metro CSA assigns the complaint to the appropriate TSP for investigation and documentation.

The TSP has 30 days to complete their investigation, including obtaining additional information needed from the complainant to investigate or to resolve the case. The investigator will follow the complaint process, and once the investigation is concluded, the case resolution will be documented in the CAS.

The CAS system is programmed to notify the CSA if a complaint has not been responded to within the required time frame. Upon system notification, the CSA will send out a reminder notice to the appropriate TSP that the case is not yet resolved or closed out.

Once the case has been resolved the complainant will receive a response in the manner identified.

Valley Metro and the City of Phoenix monitors the process monthly to ensure Title VI complaints are fully investigated, adequately documented, and that the complainant was responded to in the manner requested. Should an inaccuracy be found, Valley Metro and/or the City of Phoenix will work with CSA and the appropriate TSP to reopen the complaint for further investigation until resolution or completion.

#### Investigating a Title VI Complaint

Each documented Title VI investigative report must address each of the "Five Federal Investigative" steps found in 28 CFR, Part 35 and FTA Circular 4702.IA. The seven steps are:

STEP ONE: The TSP will review the complaint information entered into CAS by Valley Metro Customer Service staff. Any new issues identified during the investigation should also be documented in CAS.

STEP TWO: Interviews and collections of facts.

- TSP identifies respondents to interview, if needed.
- TSP interviews respondents identified and documents details from the interviews in CAS.
- Investigate every "issue" (stated in the "statement of issues noted in step one).
- Separate facts from opinions.

"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:

- Complainant
- Operator

- Radio/Dispatch/OCC reports
- Maintenance staff
- City Transit staff
- Witnesses
- Other transit employees

The TSP identified, collects, and reviews other information and/or documents that provide facts for the investigation. Any applicable information is to be documented in CAS. Documents to review can include:

- GPS tracking software and programs
- Maintenance records
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Route history
- Other documents deemed appropriate by the TSP

**STEP THREE:** TSP documents pertinent regulations, rules, policies, and procedures that apply to the investigation in CAS under the case number assigned.

Pertinent regulations, rules, policies, and procedures may include:

- Title VI requirements
- Company rules and procedures
- Valley Metro and City of Phoenix policies and service standards
- Contractual requirements

STEP FOUR: Complaint Determination.

- TSP compares each fact from "findings of fact" to the list of regulations, rules, etc.
- TSP makes a fact-based determination of alleged violation(s).

STEP FIVE: Description of resolution for each valid violation.

- TSP describes specific corrective actions for each violation found
- TSP documents follow-up action, if applicable
- TSP documents the complaint resolution in CAS

TSP Complaint Resolution(s):

- Must include specific complaint resolutions for each valid violation noted.
- Document a follow-up action plan, where applicable.
- If no valid violations are found, note policies, procedures, etc. reviewed during the investigation and withtransit operator.
- Documented complaint information should always include staff initials, title, and dates.

#### Response to Customer

TSP will respond to the Customer in the manner identified and will document the response provided in CAS under the case number assigned.

### **Title VI Complaint Form**

#### TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at csr@valleymetro.org.

SECTION 1: CUSTOMER INFORMATION		
First Name:	Last Name:	
Address:		
City:	State:	Zip:
Home Phone:	Cell Phone:	
Email:	Preferred m	ethod of contact: 🗌 Phone 🛄 Email

#### SECTION 2: INCIDENT INFORMATION

Date of Incident:	Time of Incident:	AM PM City:	
Incident Location:		Direction of Travel:	
Route #:		Bus/Light Rail/Streetcar #:	

Service Type: Local Bus Express/RAPID Circulator/Connector Light Rail Streetcar Dial-a-Ride Operator Name:

Operator Description:

What was the discrimination based on (Check all that apply): Race Color National Origin Other

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? Yes No If yes, please provide information about a contact person at the FTA where the complaint was filed: Name: Title:

Address:

\_\_Phone:\_

Have you previously filed a Title VI complaint with this agency?  $\Box$  Yes  $\Box$  No Signature and date required below:

Signature\_ Date



### **Title VI Complaint Form Spanish**

### FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) ó por correo electrónico a csr@valleymetro.org.

SECCIÓN 1: INFOR	MACIÓN DEL CLIENTE	
Nombre:	Apellido:	
Domicilio:		
Ciudad:	Estado:	Código Postal:
Teléfono del Hogar:	Teléfono Celular:	
Correo Electrónico:	Método preferido de conta	acto: 🗌 Teléfono 🗌 Correo Electrónico

#### SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente:	Hora del Incidente: AM PM_Ciudad:
Ubicación del Incidente:	Dirección del Viaje:
Ruta #	Autobús/Tren Ligero/Tranvía #

Tipo de Servicio Autobús Local Express/RAPID Circulador/Conector Tren Ligero Tranvía Dial-a-Bide Nombre del/la Operador/a:

Descripción del/la Operador/a:

¿En qué se basó la discriminación? (Marque todo lo que sea aplicable):

Raza Color Origen Nacional Otro

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

; Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? Sí D No Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre:	Título:	
Domicilio:		Teléfono:

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? 🗆 Sí 🗆 No Firma y fecha requeridas abajo:



Firma

Fecha

### **Title VI Annual Reporting**

Title VI Annual Reporting

Agency Name \_\_\_\_\_

Federal Fiscal Year\_\_\_\_\_

This reporting format will be used for reporting Title VI activities of subrecipients. The Annual Report is to be submitted by October 15<sup>th</sup> annually to the City of Phoenix Public Transit Department.

 <u>Investigations, Lawsuits, Complaints</u>: Identify each Title VI discrimination violation(s) filed against the subrecipient. Provide a summary of each with description, date case filed, case summary, case status, and case resolution action(s).

AGENCY has not had any Title VI Investigations, Lawsuits, or Complaints during.

-		1	1	
Name and/or	Date Case	Case Summary	Case Status/	Case Resolution
Case Number	Filed	(include basis of	Response	Action
	(Month, Day,	complaint: ex.		
	Year)	race, color,		
		national origin)		
Investigations	-			•
mesagariono				
	+		1	
1				
Lawsuits				
	1	1	1	1
Complaints				
		1	1	1
			ļ	
		1	1	1

### **Title VI Annual Reporting**

#### Title VI Annual Reporting

2.) <u>Public Participation</u>: List any activities during the reporting period such as Public announcements and/ or communications for meetings, hearings, service frequency changes, project notices. Include the following:

- 1. How were special language needs assessed?
- What outreach efforts did you utilize to ensure that minority, low-income, and LEP populations groups were provided opportunity to participate in those outreach activities? (Examples: provided materials in other languages, met with local social service agencies, advertised on website or publication)

3.) <u>Transit Related Facilities</u>: Identify if the recipient constructed a facility, such as vehicle storage facility, maintenance facility, operation center, etc. the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

AGENCY has not constructed any transit facility since the last Title VI update.

4.) <u>Title VI Notice</u>: At a minimum recipient shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, transit vehicles, etc.

Provide a direct website link to review Civil Rights (Title VI/ADA) web compliance:

AGENCY confirms that the minimum Title VI Notice requirements have been met.

Reporting Summary submitted by:

 Name and Title
 Date

 Signature
 Signature

# Subrecipient Title VI Plan Due Dates

Subrecipient	Program Status	Plan Effective Date	Plan Expiration Date
City of Avondale	Approved	10/1/2018	10/1/2021
City of Buckeye	NR	NR	NR
City of Chandler	Approved	11/8/2018	11/8/2021
City of EL Misson	Annanauad	F /21 /2010	F / 24 / 2022
City of El Mirage	Approved	5/21/2019	5/21/2022
City of Glendale	Approved	11/27/2018	11/27/2021
City of Goodyear	Approved	6/10/2019	6/10/2022
City of Mesa	Approved	2/25/2019	2/25/2022
City of Peoria	Approved	2/19/2019	2/19/2022
City of Scottsdale	Approved	2/5/2019	2/5/2022
City of Surprise	Approved	12/4/2018	12/4/2021
City of Tempe	Approved	12/20/2018	12/20/2021
City of Tolleson	Approved; Concur	4/28/2020	4/28/2023
Town of Guadalupe	Approved; Concur	2/27/2020	2/27/2023
Valley Metro	Approved	10/1/2018	10/1/2021

## Valley Metro

• Public Participation Plan Update

• Language Assistance Plan (LAP) Update

City of Phoenix Transit Title VI Resources

### For subrecipient information visit:

https://www.phoenix.gov/publictransit/subrecipientresources



## **Technical Assistance Contacts**

### **City of Phoenix Public Transit**

Antionette Cooper Civil Rights Coordinator

antionette.cooper@phoenix.gov 602-262-4507

Christina Hernandez Compliance Program Manager <u>christina.hernandez@phoenix.gov</u> 602-534-9161

Valley Metro Robert Forrest Environmental Program Manager rforrest@valleymetro.org 602-622-2359



# **<u>Civil Rights Website Compliance</u>**

- Civil Rights Title VI protects discrimination on the basis of: <u>race</u>, <u>color</u>, and <u>national origin</u>;
- Whereas Civil Rights ADA protects only <u>disability</u>
- ADA compliance is a separate and distinct Civil Right protection <u>not</u> related to Title VI;
- However, much like ENVR Justice components which are reviewed in conjunction with Title VI requirements, ADA website compliance is also reviewed in conjunction with Title VI website compliance

## **Civil Rights ADA Requirements**

### Per FTA Circular 4710.1

Subrecipients of federal funds are required to disclose the following (6) notices on the agency website:

**ADA Public Notice** 

**ADA Complaint Procedures** 

**ADA Complaint Form** 

All forms must be posted in English & Spanish

# **ADA Public Notice**

### ADA Notice to the Public

### Notifying the Public of Rights Under ADA TYPE YOUR AGENCY/TRANSITPROVIDERNAME HERE

The TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE operates its programs and services without regard to disability in accordance with the Americans with Disabilities Act (ADA) of 1990, Section 504 of the Rehabilitation Act of 1973. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under ADA may file a complaint with the <u>TYPE</u> <u>YOUR</u> AGENCY/TRANSIT PROVIDER NAME HERE.

For more information on the TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE's civil rights program, and the procedures to file a complaint, contact TYPE ADA CONTACT PERSON TYPE CONTACT PERSON PHONE NUMBER HERE, (TTY TYPE YOUR TTY NUMBER HERE); email TYPE ADA PERSONS EMAIL HERE; or visit our administrative office at TYPE YOUR ADDRESS HERE. For more information, visit TYPE YOUR WEB ADDRESSHERE

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: ADA 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 TYPE ALTERNATE LANGUAGE PHONE NUMBER HERE. Para información en Español Lame: TYPE NAME AND CONTACT INFORMATION HERE

## **ADA Complaint Procedures**

#### ADA-Related Service Complaint Process

Type your Agency Note Here welcomes comments, complements, and complaints from customers on their experiences using Type your Agency Name Here services. Customer input helps us identify areas needing improvement, and commendations are always appreciated.

All customer complaints are carefully reviewed, and those submitted by customers who experience accessibility or ADA-related problems are additionally reviewed for adherence to Type your Agency Name Here policies by the Type Agency Person Responsible for ADA.

To file an ADA-related service complaint, customers may contact Type your Agency Name Here using any of the following methods:

- Via Mail to:
  - Type your Agency Name Here c/o Type your Agency Name Here Type your Address Here
- Via Phone
   Type your Phone Number Here or
   Type your TTY Number Here
- Via OCTA Website
   Type your Web Address Here
- Via Email

Type your Email Address Here Type your Agency Name Here will investigate the complaint and promptly communicate a response to the customer with 10 business days.

All submittal methods will result in the Customer Relations department receiving the complaint information and entering it into the customer comment data base, which documents every complaint received and all related follow-up activities. Customers with an ADA-related complaint receive a complaint confirmation/tracking reference number, usually within the same day but no later than ten (10) business days from the day **Type your Agency Name Here** receives the complaint. If the customer does not receive a response within the ten (10) day timeframe, he or she can call the **Type Agency Person Responsible for Customer Relations** Department **Type your Phone Number Here** to obtain the confirmation/tracking reference number.

Responsible Type your Agency Name Here operating divisions or administrative departments investigate all complaints and implement any corrective actions to be taken. Complaints involving ADA or accessibility elements receive an additional review by Type Agency Person Responsible for ADA after the investigation has been completed. After the ADA Compliance oversight review has been completed, Customer Relations will provide a written reply to the customer, to the contact address provided. within ninety (90) days of receiving the complaint. All complaints are investigated within a few weeks, but some may require more extensive investigation, or require more time to identify corrective measures. In any case, a written reply will be provided to the customer within ninety (90) days.

Whether our customers are submitting complaints about service problems or sharing a great experience, we welcome the opportunity to be of service.

# **ADA Complaint Form**

### AGENCY NAME

### AmeriOns with Disabilities Act and Section 504 of the Rehabilitation Act of 1973 Discrimination Complaint Form

Instructions: If you believe Type your Agency Here has engaged in discrimination against one or more persons based on medical condition or disability, please fill out this form completely, sign, and return to the address on the next page.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request. Call (XXX) Type Agency Phone Number Here for assistance or TTY at Type Number Here.

Name of Complainant:			
Address:			
City:	State:	Zip Code:	
Home Phone:	Business Phone:		
Person Discriminated Against: (if other than the complainant)			
Address:			
City:	State:	Zip Code:	
Home Phone:	Business Phone:		

#### What date did the discrimination occur?

Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated (use additional space on the next page if necessary):

Has a complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court? Yes  $\Box$  No  $\Box$ 

State:	Zip Code:
	_Date:
Please Return Form to	:
ADA Coordinator	
Type Agency Name Here	<u>.</u>
Type Agency Address Here	
l at Type <mark>Agency en</mark>	nail address
Phone: (XXX) Fax: (XXX)	
	State: State: Please Return Form to ADA Coordinator Type Agency Name Here Type Agency Address Here at Type Agency en Phone: (XXX)

TTY: (XXX)

S:\Oversight\CIVIL\_RTS\ADA Template 7.22.2020

# **Website Compliance Example**

### Civil Rights Website Compliance – ADA & Title VI Program

- Examples of subrecipient website listing Civil Rights ADA & Title VI required pdf forms and notices
- Subrecipient can combine English & Spanish forms in one pdf
- If language translation is available on subrecipient website, no Spanish forms are required

### Title VI Plan, Forms, Notices

Title VI Notice to Public - English

Title VI Notice to Public – Spanish

Title VI Complaint Procedures – English

Title VI Complaint Procedures - Spanish

Title VI Complaint Form – English

Title VI Complaint Form – Spanish

Title VI Program Plan for 2019-2022

### ADA Forms & Notices

ADA Notice to Public – English

ADA Notice to Public – Spanish

ADA Complaint Procedures

ADA Complaint Procedures - Spanish

ADA Complaint Form – English

ADA Complaint Form – Spanish