



Title VI Implementation Plan

July 1, 2019 to June 30, 2022

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Title VI Policy Statement

The Tempe Community Action Agency (TCAA) assures full compliance with the 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 Tempe Community Action Agency sponsored program or activity. There is no distinction between the sources of funding.

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

The Executive Director has delegated the authority to Juliet Armstrong Starkey, Director of Operations, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

 A handwritten signature in black ink, appearing to read 'Deborah Arteaga', with a long horizontal flourish extending to the right.

Deborah Arteaga
Executive Director

Title VI Notice to the Public

Notifying the Public Of Rights Under Title VI

Tempe Community Action Agency 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 Tempe Community Action Agency.

For more information on Tempe Community Action Agency civil rights program, and the procedures to file a complaint, contact Juliet Armstrong-Starkey, (480) 422-8922, ext. 5886 or email juliets@tempeaction.org; or visit our administrative office at 2146 E. Apache Blvd, Tempe, Arizona. For more information, visit www.tempeaction.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.

Para información en Español llame: (480) 422.8922

Title VI Notice to the Public - Spanish

Notifying the Public Of Rights Under Title VI

(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 Tempe Community Action Agency programa de derechos civiles, y los procedimientos para presentar una queja, contacte Juliet Armstrong-Starkey, (480) 422-8922, ext. 5886, o visite nuestra oficina administrativa en 2146 E. Apache Blvd, Tempe, Arizona. Para obtener más información, visite www.tempeaction.org.

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: 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 notices are posted in the following locations:
2146 E. Apache Blvd, Tempe, AZ 85281*

This notice is posted online at www.tempeaction.org/findhelp

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 Tempe Community Action Agency 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 Tempe Community Action Agency will review the complaint form to determine any action that needs to be taken.
- (7) Tempe Community Action Agency has 14 days to investigate the complaint. If more information is needed to resolve the case, Tempe Community Action Agency may contact the complainant. The complainant has 7 business days from the date of the letter to send requested information. If Tempe Community Action Agency does not receive the additional information within 7 business days, Tempe Community Action Agency can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (8) After Title VI program coordinator 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. A 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 7 days after the date of the letter or the LOF to do so.

(9) A complainant dissatisfied with Tempe Community Action Agency decision may file a complaint with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) 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

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 IV:		
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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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
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Please submit this form in person at the address below, or mail this form to:
 Tempe Community Action Agency, Juliet Armstrong-Starkey, Title VI Coordinator
 2146 E. Apache Blvd, Tempe,
 AZ 85281
 480-422-8922

A copy of this form can be found online at www.tempeaction.org/findhelp

Title VI Complaint Form

Forma para presentar quejas por faltas al Título VI de la Ley de Derechos Civiles de 1964

El Título VI de la Ley de Derechos Civiles de 1964 establece que “ninguna persona en los Estados Unidos, con base en su raza, color, u origen nacional, sea excluida de participar, negada beneficios, o sujeta a discriminación en cualquier programa o actividad que reciba ayuda financiera federal”. La siguiente información es necesaria para ayudarnos a procesar su queja. Si requiere ayuda adicional para completar esta forma, por favor pídala.

Sección I:		
Nombre:		
Dirección:		
Teléfono (Casa):		Teléfono (Trabajo):
Dirección de correo electrónico:		
Requisitos de formato accesible?	<input type="checkbox"/> Ampliación de foto	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí*	<input type="checkbox"/> No
<i>*Si su respuesta es “sí” a esta pregunta, vaya a la Sección III.</i>		
Si su respuesta es “no” a esta pregunta, por favor ponga el nombre y la relación de la persona a la que usted se queja:		
Por favor, explique por qué se ha declarado en un tercero:		
Por favor, confirma que ha obtenido la autorización de la parte perjudicada si está presentando en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Sección III:		
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional		
¿En qué fecha sucedió la supuesta discriminación? (mes, día, año):		

En sus propias palabras, describa la supuesta discriminación. Explique qué sucedió y quién cree usted que fue responsable. Por favor use el reverso de esta hoja si necesita más espacio.		
Sección IV:		
¿Ha presentado previamente una queja del Título VI con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No

Seccion V.		
¿Ha presentado esta queja con alguna otra agencia federal, estatal, o local; o en cualquier corte federal o estatal?	<input type="checkbox"/> Si	<input type="checkbox"/> No
Si su respuesta es "Sí", indique en cuál o cuáles agencias: Agencia federal: ___ Corte federal: ___ Agencia estatal: ___ Corte estatal: ___ Agencia local: ___		
Por favor escriba los datos de alguna persona en la agencia/corte donde quedó registrada la queja.		
Nombre:		
Teléfono:		
Dirección:		
Ciudad:		
Estado:		Código Postal:
Seccion VI.		
Nombre de la Agenda que la queja es en contra:		
Persona de contacto:		
Título:		
Numero de Teléfono		

Por favor firme. Puede anexar otros materiales escritos o información adicional importante en relación con su queja.

Firma

Fecha

Por favor, someta este formulario en persona en la siguiente dirección, o envíe lo por correo a:

Tempe Community Action Agency, Title VI Coordinator

2146 E. Apache Blvd, Tempe, AZ 85281

A copy of this form can be found online at www.tempeaction.org/findhelp

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 Taken (Final Findings)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

Tempe Community Action Agency is a new recipient of funds and has not had any Title VI complaints, investigations, or lawsuits to report this period.

Public Participation Plan

Tempe Community Action Agency engages the public (customers enrolled in our programs) in its planning and decision-making processes, as well as its marketing and outreach activities. Customers are invited to participate in through surveys. As an agency receiving federal financial assistance, TCAA uses the following community outreach and customer inquiry efforts:

- Social media posts to the public: weekly
- Community newsletters: quarterly
- Agency announcements shared with local print, TV, and radio media: quarterly
- Agency website: ongoing
- Annual Board of Directors Meeting: June of each year
- Customer Feedback Surveys: Twice annually

In the upcoming year TCAA will make the following community outreach efforts:

- Social media posts to the public: weekly
- Community newsletters: quarterly
- Agency announcements shared with local print, TV, and radio media: quarterly
- Agency website: ongoing
- Annual Board of Directors Meeting: June of each year
- Customer Feedback Surveys: Twice annually

In the event Public Meetings are scheduled:

- (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.

In the event that TCAA submits to the Arizona Department of Transportation an application for funding, it shall include a public notice along with a 30-day public comment period.

Limited English Proficiency Plan

It is the policy of TCAA to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). The policy/guideline provides direction for effective staff communication with LEP individuals, and provides access to important programs and information for LEP individuals. TCAA is committed to complying with Federal requirements in providing free meaningful access to its programs and activities for its LEP customers.

Tempe Community Action Agency 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 TCAA 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.

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. TCAA will also employ bilingual (English/Spanish) employees in programs that serve predominately Spanish-speaking populations.

Note: The Tempe Community Action Agency has chosen to adopt the City of Phoenix/Valley Metro Language Assistance Plan. Phoenix has conducted a comprehensive study of Maricopa County as a whole and the results show that the secondary language is Spanish.

Safe Harbor Provision

TCAA 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) Public Hearings

Non-Elected Committees Membership Table

A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

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

Body	Caucasian	African American	Asian American	Native American	Other	Latino
Population (City of Tempe)	72.6%	5.9%	5.7%	2.9%	8.9%	21%
Board of Directors	85%	5%	0	0	5%	5%

Tempe Community Action Agency makes every effort to encourage the participation of minorities into its governance body and its committees and work groups. The Board's Governance Committee is charged with nominating qualified Board members with a focus on a balanced demographic mix.

Monitoring for Sub-recipient Title VI Compliance

- The TCAA does NOT monitor sub-recipients for Title VI compliance.

Title VI Equity Analysis

TCAA has no current or anticipated plans to develop new transit facilities covered by these requirements

Board Approval for the Title VI Program

The Tempe Community Action Agency Board of Directors reviewed the Title VI implementation Plan at its meeting on June 21, 2019. A motion was made by Jason Franz, seconded by Doug Gaylor and unanimously approved to accept the Plan as presented.



schedules. Jason made a motion to (begudgingly) accept her request. The motion was seconded by Doug and approved.

- **FY2020 New Board Members:** Shereen moved to approve the Nominations Committee's proposed slate of new board members: Julie Kent, Raveen Arora, Laura Showalter, Lou Silverman, and Jennifer Johnson. The motion was seconded by Nick. Discussion followed. The motion was approved.
- **FY2020 Slate of Officers:** Jason motioned to approve the Nominations Committee's proposed FY2020 Officers: Chairperson: Nick Bastian, Vice Chairperson: Electa Thompson, Secretary: John Skelton, Treasurer: Aaron Myers, Immediate Past Chair: Barbara Lloyd. Amy seconded the motion. The motion passed.

Executive Director Report: Deborah provided board members with operational updates:

- **Feasibility Study:** Staff has met with two consultants to explore cost and process for conducting a feasibility study. Other outreach is occurring with LISC and ASU to identify additional resources and potential funding for this effort. We anticipate launching the feasibility study in the fall.
- Staff are working with City of Tempe staff to prepare for changes to our Senior Independence programming including moving out of senior center activities and expanding case management and in-home services. The program changes are progressing as planned and will be finalized on July 1 as anticipated.
- Julie has developed a new business opportunity with Mountain Park Health Center to provide financial coaching to employees of MPHCC. A contract is under negotiation at this time.
- TCAA was invited to submit a Bank of America Neighborhood Builders application which, if successful, could result in a \$200,000 organizational capacity building grant. Two awards are selected per state.
- End of year data is being tallied at this time and the final FY2019 report will be provided to the board in August. Early figures show a rise in the volume of customers served compared to the prior year, particularly in the Food Pantry.

Board Chairperson's Report:

Barbara presented a lease agreement negotiated with The Dhaba to relocate four I-HELP staff in a small office space in The Dhaba building on Apache. The lease is for one year only, allowing TCAA time to complete the feasibility study and identify alternate future space. John motioned for approval of the lease agreement and Jason F seconded the motion. The motion was approved.

Deborah presented the Title VI Civil Rights Plan, which is a plan outlining nondiscrimination policy and grievance process, a requirement of the City of Phoenix transportation contract. Discussion followed. Jason F motioned to approve the Title VI Civil Rights Plan and Doug seconded. The motion was approved.

Adjournment: The meeting adjourned at 8:35 AM and transitioned into a strategic planning session facilitated by Suzanne Durkin Bighorn.



TCAA Board of Directors Meeting
June 21, 2019 7:30 AM – 8:45 AM
Landings Credit Union, 2800 S. Mile Ave., Tempe, AZ 85281

Minutes

Members Present: Tom Avery, Nick Bastian, Jason Franz, Doug Gaylor, Margaret Humnicutt, Shereen Lerner, Barbara Lloyd, Jason Mattina, Aaron Meyers, John Skelton, Amy Wilson

Members Absent: Ed Baker, Kate Borders, Jill Buschbacher, Chris Gonzalez, Bob Kawa, Electa Thompson, Manjula Vaz

Staff Present: Juliet Armstrong-Starkey, Deborah Arteaga, Todd Hirsch, Joe Rivera

Welcome: Barbara Lloyd welcomed attendees and called the meeting to order at 7:34 AM.

Board member Tom Avery was recognized in attendance as his temporary leave from the board has concluded and he is now an active member once again.

The meeting minutes from May 17, 2019 were reviewed by members. Doug motioned to approve the minutes; seconded by Jason. The motion was approved.

Events Committee: Jason announced that the Fundraising Committee has joined forces with the Events Committee now through October to assist with preparation for the VICINITY Tempe event. A contract was signed with Big Surf as this year's venue and a tracking form was developed to track the donation of silent auction items. Planning is well underway. Our present priority is to build up silent auction items for this year's event. Amy confirmed that Bottle Shop Wine will donate the wine and Deborah reported that a meeting with Fate Brewery was requested to confirm the beer donation. Ticket sales will begin the first week of August. Pricing will be the same as last year: \$85 increasing to \$100 -10 days in advance of the event, then \$125 at the door.

Finance Committee: Aaron presented the financial statements for the period through April 30. Margaret made a motion to approve the April 30, 2019 financial statement; seconded by Shereen. The motion was approved. Aaron presented the proposed FY2020 Agency Budget for approval. Discussion followed. Shereen moved to approve the proposed FY2020 Agency Budget. Jason F. seconded the motion. Motion carried.

Fundraising Report: Joe presented the Fundraising Plan vs. Actual Report. A critical goal for his team is to build up sustaining donors which has increased over recent years. Grant contributions exceeded our target for the year. He also presented a draft communications matrix and marketing goals for FY2020. This plan will be aligned with marketing/PR activities in the new year to build awareness and engagement on multiple social media platforms as well as drive contributions to the agency. We are meeting with potential new marketing/PR partners as OH Partners will end their contract with TCAA on June 30.

Nominations Committee: Barbara provided a report on the Nominations Committee's activities to identify, and nominate new board members. Ed Baker's 6-year term is ending. Several board members expressed appreciation for his dedication over the 6-year term. Kate Borders submitted a request to resign due to schedule conflicts with board meeting