
Title VI Implementation Plan



*An Outreach of the Ahwatukee
Foothills Family YMCA*

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Title VI Policy Statement

The Valley of the Sun YMCA policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any The Valley of the Sun YMCA/ YOPAS sponsored program or activity. There is no distinction between the sources of funding.

The Valley of the Sun YMCA also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, The Valley of the Sun YMCA/ YOPAS will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When The Valley of the Sun YMCA distributes Federal-aid funds to another entity/person, The Valley of the Sun YMCA will ensure all sub recipients fully comply with The Valley of the Sun YMCA/ YOPAS Title VI Nondiscrimination Program requirements. The Chief Executive Officer has delegated the authority to Marcela Holub as the VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Bryan Madden, Chief Executive Officer

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI The Valley of the Sun YMCA

The Valley of the Sun YMCA/ YOPAS operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Valley of the Sun YMCA/ YOPAS.

For more information on the Valley of the Sun YMCA's civil rights program, and the procedures to file a complaint, contact Sandra Franks Executive Director, Ahwatukee Foothills Family YMCA at 602-212-6082 svfranks@vosymca.org ; or visit the Ahwatukee Foothills Family YMCA at 1030 E. Liberty Lane Phoenix, AZ 85048 or, for more information, visit www.valleymca.org.

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **City of Phoenix Public Transit Department:** ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 **FTA:** ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact Marcela Holub. Para información en Español llame: Marcela Holub, 602-257-5128, marcela.holub@vosymca.org.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI The Valley of the Sun YMCA/ Y OPAS

The Valley of the Sun YMCA (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). 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 Valley of the Sun YMCA programa de derechos civiles, y los procedimientos para presentar una queja, contacte Sandra Franks Executive Director, Ahwatukee Foothills Family YMCA at 602-212-6082 svfranks@vosymca.org ; or visite nuestra oficina administrative en Ahwatukee Foothills Family YMCA at 1030 E. Liberty Lane Phoenix, AZ 85048 or, para mas informacion visite., (TTY TYPE YOUR TTY NUMBER HERE); o visite nuestra oficina administrativa en TYPE YOUR ADDRESS HERE. Para obtener más información, visite www.valleymca.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: Ahwatukee YMCA website, and Ahwatukee YMCA facility.

This notice is posted online at www.valleymca.org/ahwatukee

Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by The Valley of the Sun YMCA , 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, national origin, or disability may file a Discrimination 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 ADA/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 The Valley of the Sun YMCA will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Valley of the Sun YMCA or submitted to the state or federal authority for guidance.
7. The Valley of the Sun YMCA , will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
8. The Valley of the Sun YMCA 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 60 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
9. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination 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.

10. A copy of either the closure letter or LOF must be also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
11. A complainant dissatisfied with The Valley of the Sun YMCA decision may file a complaint with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) office of Civil Rights: FTA: Attention Title VI Program Coordinator, East Building, 5th floor –TCR 1200 New Jersey Ave. , SE Washington, DC 20590.
12. A copy of these procedures can be found online at: www.valleymca.org

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
<input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court : _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Valley of the Sun YMCA
Marcela Holub, Senior Vice President Human Resources
350 N First Avenue
Phoenix, AZ 85003

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

**Forma Para Poner una Queja
(De Acuerdo Al Título VI)**

Nota: La siguiente información se necesita para procesar su queja.

Información de la persona que está poniendo la queja:

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

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

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

¿Cuál de las siguientes razones describe por lo que usted siente que se le discriminó?

Raza/Color (Especifique) _____ Nacionalidad (Especifique) _____
Sexo (Especifique) _____ Edad (Especifique) _____
Incapacidad (Especifique) _____

¿En qué fecha(s) sucedió la discriminación? _____

Describa la presunta discriminación. Explique qué sucedió y quién cree usted que fue responsable (si necesita más espacio, agregue otra hoja).

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

¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal? Marque todas las que apliquen.

Agencia Federal _____ Corte Estatal _____ Corte Federal _____
Agencia Local _____ Agencia Estatal _____

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre: _____
Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Por favor firme abajo. Puede anexar cualquier material escrito u otra información que usted crea que es relevante sobre su queja.

Firma de la Persona que presenta la queja _____
Fecha

Número de Anexos: _____

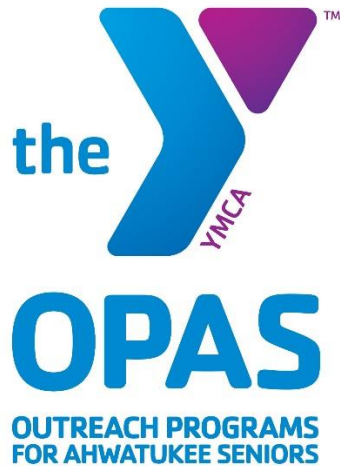
Someta la forma y cualquier información adicional a:

Valley of the Sun YMCA
Marcela Holub, Senior Vice President Human Resources
350 N First Avenue
Phoenix, AZ 85003

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)				



Public Participation Plan



An Outreach of the Ahwatukee Foothills Family YMCA

Y OPAS is an outreach of The Valley of the Sun YMCA's Ahwatukee Foothills Family YMCA. Y OPAS provides transportation to seniors using volunteer drivers. The program has 190 volunteers and 460 clients or customers. The public is engaged 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, Y OPAS will make the following community outreach efforts:

Y OPAS has made presentations and/or provided information to the public via:

- The Ahwatukee Foothills Family YMCA including senior appreciation week, quarterly educational opportunities, and ongoing promotion of the program.
- Kiwanis Club
- Ahwatukee Recreation Center
- Ahwatukee Board of Management
- The Network of Volunteer Nonprofits Serving Seniors
- Local churches
- The Pecos Senior Center
- The Senior Advocacy Group of Ahwatukee (regular meetings and at the annual senior symposium).
- Veterans at the American Legion
- The Ahwatukee Boys Team Charity
- Festival of Lights beer and wine tasting event
-

Additionally, Y OPAS uses the local Ahwatukee Foothills News to promote our programs and invite the public to participate and provide input. As an outreach of the YMCA all programs we provide are available on the website and through social media (facebook, Instagram and twitter). We also survey our clients and volunteers every two years for input on services as well. Lastly, we publish a quarterly newsletter for clients and associates of Y OPAS and a monthly newsletter for volunteers – both are made available at the YMCA.

- (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.

Y OPAS has submitted for the first time to the Maricopa Association of Governors 5310 New Freedom Grant. Part of the annual application is a public notice, which includes a 30-day public comment period. Y OPAS will comply with all required notices and reporting.

Limited English Proficiency Plan



Limited English Proficiency Plan

Y OPAS 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 Y OPAS 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 the Y OPAS's extent of obligation to provide LEP services, the Y OPAS 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 Y OPAS service area who may be served or likely to encounter by Y OPAS program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an Y OPAS services;
- 3) The nature and importance of the program, activities or services provided by the Y OPAS to the LEP population; and
- 4) The resources available to Y OPAS 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. Please see the chart below.

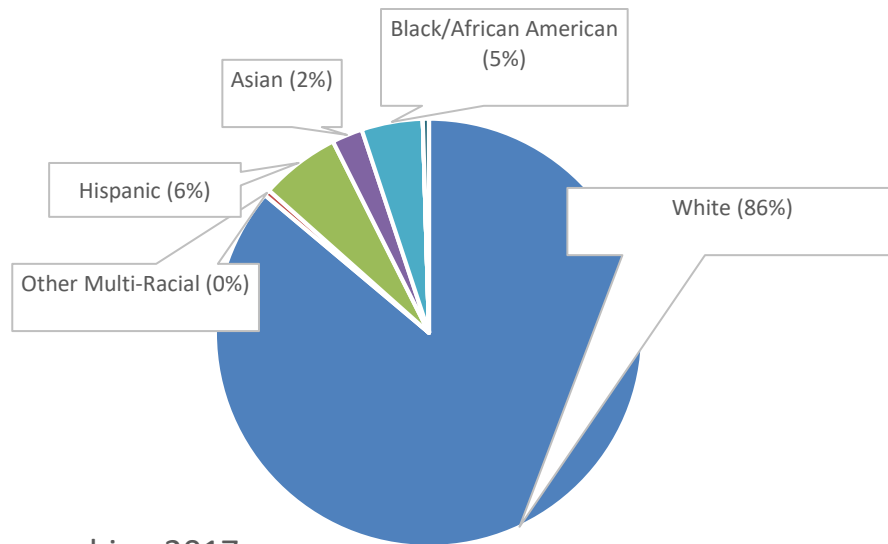
Safe Harbor Provision

Y OPAS 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**



Y OPAS Demographics 2017

- White (86%)
- Hispanic (6%)
- Black/African American (5%)
- American Indian/Alaskan Native (0%)
- Black/African American and White (0%)
- Unknown (0%)
- Other Multi-Racial (0%)
- Asian (2%)
- Am. Indian/Alaskan Nat. and White (0%)
- Asian and White (0%)
- Am.Indian/Alaskan Native and Black/African Am. (0%)
- Native Hawaiian/Other Pacific Islander (0%)

Y OPAS demographics as taken from our Ride scheduler database indicate the majority of our clients are English speaking.

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
YOPAS Population	86%	6%	5%	2%	
Metro board	88%	6%			6%
Ahwatukee YMCA Board	100%				

Volunteer development is an ongoing process. We work diligently for our Boards and Committees to reflect the demographics of our communities.

Title VI Equity Analysis

Board Approval for the Title VI Program



Metro Board of Directors Annual Meeting
Tuesday, November 6, 2018
10:00 am – 1:00 pm
MINUTES

FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

TOTAL ATTENDANCE = 14

Board of Directors in attendance; 9 Brad Albert, Fred DuVal, John Graham, Don Isaacson, Mike King, Mike McDaniel, Jim Pitman, Bob Rice, Amy Thurston

Board of Directors not in attendance; 8 Ryan Abbott, David Adame, Daniel Calihan, Susan Drumm, Rick Hellers, Robert Nichols, Scott Spangler, Mike Watts

Staff in Attendance; 5 Bryan Madden, Peyton Tune, Sue Suman, Susan Waschler, Shannon Reeths,

CALL TO ORDER – AMY THURSTON

The annual meeting of the Metro Board of Directors for the Valley of the Sun YMCA was called to order by Amy Thurston, Co-Chair, at 10:15 am on Tuesday, November 6, 2018. It was determined that a quorum was present and the meeting could conduct business.

APPROVAL OF MINUTES; SEPTEMBER 25, 2018 – AMY THURSTON

Amy Thurston requested review and approval of the minutes from the September 25, 2018 Metro Board of Directors meeting.

ACTION:

Mike King made a motion to approve the September 25, 2018 meeting minutes, second by Bob Rice. Unanimously approved.

TITLE VI POLICY – SUE SUMAN

Sue Suman presented the Title VI Policy. Key items discussed included;

- Purpose is to assure full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities
- The policy states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any of the Valley of the Sun YMCA/YOPAS sponsored program or activity
- There is no distinction between the sources of funding
- Assures that every effort be made to prevent discrimination through the impacts its programs, policies, and activities on minority and low-income populations
- The Valley of the Sun YMCA/YOPAS will take reasonable steps to provide meaningful access to service for persons with limited English proficiency
- When federal aid funds are distributed to another entity/person, the Valley of the Sun YMCA will ensure all sub recipients fully comply with the Title VI non-discrimination program requirements
- The President & CEO delegates authority to the Human Resources Vice President to oversee and implement the policy requirements

ACTION:

Bob Rice made a motion to approve the Title VI Policy as presented, Second by Mike King. Unanimously approved.