



# Independence Plus, Inc. Title VI Implementation Plan

June 1, 2020 – May 31<sup>st</sup> 2023

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# Title VI Policy Statement

The Independence Plus, Inc. policy assures full compliance with Title VI of the Civil Rights Act of 1964, and related statues 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 Independence Plus sponsored program or activity. There is no distinction between the sources of the funding.

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

If Independence Plus were to distribute Federal-aid funds to another entity/person, Independence Plus will ensure all subrecipients fully comply with Independence Plus’s Title VI Nondiscrimination Program requirements. The Executive Director has delegated the authority to Dr. Gregory Triandafilou, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

  
\_\_\_\_\_  
David A Brieno, Executive Director

5/12/2020  
Date

# Title VI Notice to the Public

## Notifying the Public of Rights Under VI

### Independence Plus, Inc

Independence Plus 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 Independence Plus.

For more information on Independence Plus's civil rights program, and the procedures to file a complaint, contact Associate Director Dr. Gregory Triandafilou @ (602) 484-7610 Ext 102; [Gtriandafilou@indplus.org](mailto:Gtriandafilou@indplus.org); or visit our administrative office at 3150 N 35<sup>th</sup> Avenue, Ste 2, Phoenix, AZ 85017. For more information, visit [www.Indplus.org](http://www.Indplus.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 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 Dr. Gregory Triandafilou @ (602) 484-7610. Para información en Español llame: Martha Palomino, (602) 484-7610, Ext 105.

There are 5 separate program areas and they are all located within our agency at 3150 N 35<sup>th</sup> Ave., Ste 2 Phoenix, AZ 85017: 1) Juniper, 2) Yucca, 3) Ocotillo, 4) Cholla and 5) Sahuaro.

## Title VI Notice to the Public -Spanish

### Aviso al Público Sobre los Derechos Bajo el Título VI

#### Independence Plus, Inc

Independence Plus (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 Independence Plus' programa de derechos civiles, y los procedimientos para presentar una queja, contacte Associate Director Dr. Gregory Triandafilou @ (602) 484-7610 Ext 102; [Gtriandafilou@indplus.org](mailto:Gtriandafilou@indplus.org) o visite nuestra oficina administrativa en TYPE YOUR ADDRESS HERE. Para obtener más información, visite [www.indplus.org](http://www.indplus.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

Si necesita información en otro idioma, comuníquese con el Dr. Gregory Triandafilou @ (602) 484-7610. Para información en español llame: Martha Palomino, (602) 484-7610, Ext 105.

Hay 5 áreas de programa separadas y todas están ubicadas dentro de nuestra agencia en 3150 N 35th Ave., Ste 2 Phoenix, AZ 85017: 1) Juniper, 2) Yucca, 3) Ocotillo, 4) Cholla y 5) Sahuaro.

# TITLE VI COMPLAINT PROCEDURES

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by Independence Plus, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form or by calling Independence Plus and speaking to Associate Director who is in charge of Title VI complaints.

Independence Plus Title VI Complaint Form (English and Spanish) is located on our website: <https://indplus.org/about/title-vi-policy/>. The form is available in both English and Spanish. Complaints can also be filed by contacting Independence Plus Associate Director at:

Email: [Gtriandafilou@indplus.org](mailto:Gtriandafilou@indplus.org)  
Phone: (602) 484-7610

Independence Plus has 30 days to investigate each complaint. If more information is needed to resolve the case, Independence Plus may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to Independence Plus Associate Director.

## PROCEDURES FOR TRACKING AND INVESTIGATING TITLE VI COMPLAINTS

### TRACKING

Complaint comes in and is logged by the Associate Director.

The Associate Director sends the complaint to the cities/transit provider for investigation and documentation within 24 hours.

Complaint is returned to the Associate Director to ensure the information is complete and closes the complaint.

Each cities administrator audits the complaints as well to ensure the meet the guidelines for Title VI.

The administrator reviews an outstanding weekly report identifying outstanding complaints. During the review process the administrator will send out notifications to the agency and a copy to the relevant city to remind the entity that the complaint is not yet resolved or closed out. This process is reinitiated each week to ensure timely compliance.

The administrator audits all completed Title VI complaints to check for accuracy and has complaint reopened by the Associate Director and sent back if not completed accurately.

### INVESTIGATING

STEP ONE: Summary of the complaint, completed by the Associate Director.

STEP TWO: Statement of issues.

List every issue derived from the complaint summary. Include questions raised by each issue:

- 1) Who?
- 2) What?
- 3) When?
- 4) Where?
- 5) How?

Add new issues that surface during investigation. The final list of issues becomes outline for investigation.

STEP THREE: Respondent's reply to each issue.

- Obtain information from each respondent, listen to each tape, review each document.
- All staff will document information collected in the customer contact (respondent area).
- After all respondent information is documented, complete the documentation (remaining steps).
- Determine the action taken.
- Follow up with the customer.

Note: "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:

- Operator (Interview/History)
- Radio/Dispatch/OCC reports
- GPS tracking software and programs
- Maintenance (Staff/Records)
- Independence Plus staff
- Witnesses
- Complainant (Interview/History)
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other transit employees
- Route history

STEP FOUR: Findings Of fact.

Investigate every “issue” (stated in the “statement of issues noted in step two). Separate facts from opinions.

STEP FIVE: Citations of pertinent regulations and rules.

Develop list of all regulations, rules, policies, and procedures that apply to the investigation

- Title VI requirements
- Company rules and procedures
- Valley Metro policies and service standards

STEP SIX: Conclusions of law.

- Compare each fact from “findings of fact” to the list of regulations, rules, etc.
- Make decision on whether violations(s) occurred.
- List of violations becomes “conclusions of law”.

STEP SEVEN: Description of remedy for each violation.

- Specific corrective actions for each violation found.
- Include plans for follow-up checks.
- Do not conclude report with “no action taken”.
- If no violations found, conclude the report in a positive manner.
- Review policies and procedures.
- Review Title VI provisions.

Response to Customer:

Detailed summary of conversation with customer. Send copy of letter to customer.

Action Taken:

- Must include specific corrective action for each violation found.
- Include a follow-up action plan.
- If no violations found, note policies, procedures, etc. reviewed with operator.
- Never state “no action taken”.



# Title VI Complaint Form

## Section I:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Electronic Mail Address: \_\_\_\_\_

Accessible Format Requirements?  Large Print  Audio Tape

TDD  Other

## Section II:

Are you filing this complaint on your own behalf?  Yes\*  No

*\*If you answered "yes" to this question, go to Section III.*

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.  Yes  No

## Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race  Color  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?  Yes  No

## Section V:

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

\_\_\_\_\_

\_\_\_\_\_

**Section VI:** 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:

Independence Plus, Title VI coordinator

3150 N 35<sup>th</sup> Ave., Ste 2

Phoenix, AZ 85017

(602) 484-7610, Ext 102, [Gtriandafilou@indplus.org](mailto:Gtriandafilou@indplus.org)

A copy of this form can be found online at [www.indplus.org](http://www.indplus.org)

## Formulario de Queja del Título VI

# Ciudad de Phoenix Public Departamento de Tránsito Procedimientos de Quejas venir

**Sección I:**

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

Dirección: \_\_\_\_\_

Teléfono (Casa): \_\_\_\_\_ Teléfono (Trabajo) \_\_\_\_\_

Dirección de correo electrónico: \_\_\_\_\_

Requisitos de formato accesible?  Letra grande   
Cinta de audio

\_\_\_\_\_  TDD \_\_\_\_\_  Otro \_\_\_\_\_

**Sección II:**

¿Está presentando esta queja en su propio nombre?  Sí  No

\* Si respondió "sí" a esta pregunta, vaya a la Sección III.

Si no es así, proporcione el nombre y la relación

De la persona por quien se queja . \_\_\_\_\_

Por favor, explique por qué ha presentado un tercero: \_\_\_\_\_

Por favor, confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero. \_\_\_\_\_  Sí  No

**Sección III:**

Creo que la discriminación que experimenté se basó en (marque todos los que apliquen):

Raza  Color  Origen Nacional de

Fecha de Presunta Discriminación (Mes, Día, Año): \_\_\_\_\_

Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la persona (s) que discriminó (si se conoce), así como nombres e información de contacto de cualquier testigo. Si necesita más espacio, utilice la parte posterior de este formulario.

**Sección IV:**

¿Ha presentado anteriormente una queja de Título VI con esta agencia?  Si  No

**Sección V:**

En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.

\_\_\_\_\_  
\_\_\_\_\_

**Sección VI**

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?  Si  No

En caso afirmativo, marque todas las que correspondan:

- Agencia Federal: \_\_\_\_\_
- Corte Federal: \_\_\_\_\_  Agencia Estado: \_\_\_\_\_
- Corte Estado: \_\_\_\_\_  Agencia Local: \_\_\_\_\_

Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

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

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: Sección VI: \_\_\_\_\_

El nombre de la queja de la agencia está en contra: \_\_\_\_\_

Nombre de la persona que se queja: \_\_\_\_\_

Título: \_\_\_\_\_

Ubicación: \_\_\_\_\_

Número de teléfono (si está disponible): \_\_\_\_\_

Usted puede adjuntar cualquier material escrito u otra información que considere relevante para su queja. Su firma y fecha son requeridas abajo

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor envíe este formulario en persona a la dirección abajo, o envíe este formulario por correo a:

Independence Plus, Coordinador Título VI

3150 N 35th Ave., Ste 2

Phoenix, AZ 85017

(602) 484-7610, Ext 102

[Gtriandafilou@indplus.org](mailto:Gtriandafilou@indplus.org)

Puede encontrar una copia de este formulario en línea en [www.indplus.org](http://www.indplus.org)

# Title VI Investigations, Complaints, and Lawsuits

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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?)
<b>Investigations</b>	N/A			
1)				
2)				
<b>Lawsuits</b>	N/A			
1)				
2)				
<b>Complaints</b>	N/A			
1)				
2)				

Independence Plus has not had any Title VI complaints, investigations, or lawsuits in 2019.

## Public Participation Plan



# Independence Plus Public Participation Plan

Independence Plus, Inc. provides limited transit services which are solely provided to persons enrolled in its programs. Individuals are referred to Independence Plus through the Arizona Department of Economic Security/Division of Developmental Disabilities.

Independence Plus provides marketing and outreach to the community in the following manner:

- Independence Plus participates in outreach via community partners, and school transition fairs.
- Independence Plus provides a newsletter to our mailing list on a quarterly basis and provides them to people who visit our program.
- Independence Plus belongs to a variety of member organizations such as The Arc of Arizona and American Association on Intellectual and Developmental Disabilities.
- Independence Plus has social media consisting of a website and a site on Facebook

Independence Plus participates in the Maricopa Association of Government outreach meetings but does not engage directly in transit planning or decision-making.

The following are outreach meetings/expos Independence Plus has participated in from 2017 to 2020:

- Regional/Special Olympics Track & Field, Raymond S. Kellis H.S., Glendale
- Special Olympics Bowling
- DES/DDD and Arizona Association of Providers for People with Disabilities, 1789 W. Jefferson, Downtown Phoenix: Q & A Panel with networking
- DES/DDD Protection of Rights Commission (PRC), Review of Behavior Treatment Plans, Outreach to Community
- AZ Alliance of Non-profits Annual Conference: Conference sessions, Vendors, Networking
- Lodestar Annual Conference on Sustainability Strategies, 23<sup>rd</sup> Ave and Dunlap: Conference Sessions, Vendors, Networking
- Transition Expos throughout metro Phoenix.



## Limited English Proficiency Plan



Independence Plus, Inc.

## Limited English Proficiency Plan

☒ Independence Plus, Inc. 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 Independence Plus, Inc.'s services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the Independence Plus extent of obligation to provide LEP services, the Independence Plus, Inc. 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 Independence Plus, Inc.'s service area who may be served or likely to encounter by Independence Plus, Inc.'s program, activities, or services- 50 members. Approximately 20% have limited proficiency in the English language.
- 2) The frequency with which LEP individuals come in contact with Independence Plus, Inc.'s ADOT Program Services: 2 times daily and sometimes 3 times daily with outings.
- 3) The nature and importance of the program, activities or services provided by the Independence Plus, Inc. to the LEP population- Without the agency providing transportation, members would have to stay home. They would not be part of the socialization, teaching opportunities, and therapies specific to member and community integration.
- 4) The resources available to Independence Plus, Inc. and overall costs to provide LEP assistance. We have multilingual staff members. Languages other than English spoken by staff are Spanish, French, Sign Language, and Arabic. Our website has Google Translator which includes our latest newsletter. We are in the process of preparing a brochure in Spanish to complement the one we have in English. Our agency also calls parents or guardians directly with a bilingual person as needed.

#### Safe Harbor Provision

Independence Plus 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 : Bilingual staff members are available to participate in all meetings.

(2) Notice of Non-Discrimination and Reasonable Accommodation

(3) Outreach Materials

(4) Public Hearings

## Non-elected Committees Membership Table

Independence Plus, Inc. does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

*Independence Plus, Inc. has no current or anticipated plans to develop new transit facilities covered by these requirements.*

## List of Public Outreach to Minorities

Outreach to the general public which includes minorities is primarily through our website. We have added Google translator to make it easier for those people with a primary language of Spanish or any other language. All members of our agency including employees speak either English, Spanish, or both.

The brochure for our agency is printed in both English and Spanish and both brochures are prominently displayed in the lobby. These bilingual brochures have been very helpful at expos we have participated in for developmentally and intellectually disabled individuals transitioning from the public school system.

## Board Approval for the Title VI Program

On April 25, 2020, the board voted via email to unanimously pass the updated Title VI Implementation Plan for Independence Plus, Inc. This vote will be added to minutes at the next board meeting to be held at Independence Plus at 12 Noon on May 27, 2020.