



Independence Plus, Inc Title VI Implementation Plan



“Serving the Special Needs of Arizona”

April 24, 2023 – April 23, 2026

Contents

Title VI Policy Statement.....	3
Title VI Notice to the Public	4
Title VI Notice to the Public -Spanish.....	5
Title VI Complaint Procedure	6
Title VI Complaint Forms.....	10
Title VI Investigations, Complaints, and Lawsuits	14
Public Participation Plan	16
Limited English Proficiency Plan	17
Non-elected Committees Membership Table.....	20
Title VI Equity Analysis.....	21
Board Approval for the Title VI Program.....	23
Language Assistance Plan Introduction.....	24

Title VI Policy Statement

The 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 Independence Plus sponsored program or activity. There is no distinction between the sources of 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 distributes Federal-aid funds to another entity/person, Independence Plus will ensure all subrecipients fully comply with Independences 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

David A. Brieno, Executive Director

Title VI Notice to the Public

Notifying the Public of Rights Under Title 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 the Independence Plus's civil rights program, and the procedures to file a complaint, contact Associate Director, Dr. Gregory Triandafilou, @ (602) 484-7610, Ext #10; Gtriandafilou@indplus.org ; or visit our administrative office at 3150 N 35th Ave, Ste 2, Phoenix, AZ 85017. For more information, visit 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. 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 Dr. Gregory Triandafilou @ (602) 484-7610, Ext 103. Para información en Español llame: contact Martha Palomino @ (602) 484-7610, Ext 101.

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

The above notice is posted in the following locations: There are 5 separate program areas, and they are all located within our agency at 3150 N 35th Ave., Ste 2 Phoenix, AZ 85017: 1) Juniper, 2) Yucca, 3) Ocotillo, 4) Cholla and 5) Sahuaro. Notices are also posted in the lobby and all transit vehicles.

This notice is posted online at www.indplus.org/about/title-vi-policy/

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's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Associate Director, Dr. Gregory Triandafilou (602) 484-7610, Ext 103; o visite nuestra oficina administrativa en 3150 N 35th Ave., Ste 2, Phoenix, AZ 85017. Para obtener más información, visite: Gtriandafilou@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

El aviso anterior está publicado en los siguientes lugares: Hay 5 áreas de programas 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. Los avisos también se publican en el vestíbulo y en todos los vehículos de tránsito.

Este aviso está publicado en línea en:

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 Independence Plus including consultants, contractors, and vendors. Intimidation or retaliation because 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 Independence Plus will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing them whether the complaint will be investigated by Independence Plus or submitted to the State or Federal authority for guidance.

- (7) Independence Plus will notify the Title VI Coordinator of all Title VI complaints within 72 hours via telephone at: 602-262-7242; email to: phxtransiteo@phoenix.gov
- (8) Independence Plus has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (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 Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with Independence's Plus decision may file a complaint directly with the City of Phoenix Public Transit Department (COP): Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003 or the Federal Transit Administration (FTA) offices of Civil Rights: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: www.indplus.org/about/title-vi-policy/

Procedimientos de Quejas Bajo el Título VI

Estos procedimientos proporcionan orientación para todas las quejas presentadas bajo el Título VI del Decreto de los Derechos Civiles de 1964, en lo que se refieren a cualquier programa o actividad que sea administrado por la INDEPENDENCE PLUS, incluyendo a los asesores, contratistas y proveedores. Por ley, se prohíbe la intimidación o las represalias como resultado de una queja. Además de estos procedimientos, los reclamantes se reservan el derecho de presentar una queja formal ante otras agencias estatales o federales o de solicitar asesoría privada para quejas alegando discriminación. Se hará todo lo posible para resolver las quejas al nivel más bajo posible.

- (1) Cualquier persona que crea que ha sido discriminada por motivos de raza, color, u origen nacional puede presentar una queja bajo el Título VI completando y presentando la Forma de Quejas del Título VI de la agencia.
- (2) Las quejas formales se deben presentar dentro de 180 días de calendario de la última fecha del supuesto acto de discriminación o de la fecha en la que el/los reclamantes/se haya/n enterado de la supuesta discriminación, o cuando haya habido un curso de conducta continuo, la fecha en la que la conducta haya sido suspendida o la última ocasión en la cual ocurrió la conducta.
- (3) Las quejas se deben hacer por escrito y deben ser firmadas por el/los reclamantes/y deben incluir el nombre, el domicilio y el número de teléfono del/los reclamantes. Si es necesario, la persona de contacto del Título VI ayudará al/la reclamante a documentar las cuestiones.
- (4) Las alegaciones recibidas por fax o por correo electrónico serán admitidas y procesadas, una vez que se haya establecido la identidad del/la reclamante y la intención de proceder con la/s queja/a. Para ello, se requiere que el/la reclamante envíe por correo postal una copia original firmada del fax o de la transmisión de la nota electrónica para que la queja sea procesada.
- (5) Las alegaciones recibidas por teléfono se reducirán a un formato por escrito y se les proveerán al/la reclamante para su confirmación o revisión antes de su procesamiento. Se remitirá una forma de la queja al/la reclamante para que la complete, la firme y la devuelva para su procesamiento.
- (6) Una vez presentada, la Independencia Plus revisará la forma de la queja para determinar la jurisdicción. Todas las quejas recibirán una carta de reconocimiento informándole si la queja será investigada por la Independencia Plus o presentada a la autoridad estatal o federal para recibir su orientación.

- (7) La Independencia Plus le notificará al Coordinador del Título VI sobre todas las quejas del Título VI dentro de 72 horas por teléfono llamando al: 602-262-7242; por correo electrónico escribiendo a: phxtransiteo@phoenix.gov
- (8) La Independencia Plus tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el/la reclamante. El/la reclamante tiene 60 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el/la reclamante o no recibe la información adicional dentro de los 30 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso también se puede cerrar administrativamente si el/la reclamante ya no desea seguir adelante con su caso.
- (9) Después de que el investigador revise la queja, emitirá una de dos cartas al/la reclamante: una carta de cierre o una carta de hallazgo “Letter of Finding” (LOF). Una carta de cierre resume los alegatos y afirma que no hubo una infracción con respecto al Título VI y que el caso se cerrará. Una carta LOF resume las alegaciones y las entrevistas con respecto al supuesto incidente, y explica si se llevará a cabo alguna acción disciplinaria, capacitación adicional del/la miembro del personal u otra acción. Si el/la reclamante desea apelar a la decisión, tiene 30 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Un/a reclamante insatisfecho/a con la decisión de la Independencia Plus puede presentar una queja directamente con el Departamento de Transporte Público de la Ciudad de Phoenix: City of Phoenix Public Transit Department (COP), Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, ó con las oficinas de Derechos Civiles de la Administración Federal de Transporte: Federal Transit Administration (FTA), Offices of Civil Rights, Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) Una copia de estos procedimientos se puede encontrar en línea en: www.indplus.org/about/title-vi-policy

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 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:
Independence Plus, Inc.
Attn: Associate Director
3150 N 35th Ave, Ste 2
Phoenix, AZ 85017
(602)702-1593

Formulario de queja del Título VI

Sección I:		
Nombre:		
Dirección:		
Teléfono (Casa):	Teléfono (Trabajo):	
Dirección de correo electrónico:		
¿Requerimientos de formato accesibles?	<input type="checkbox"/> Letra grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> DTS	<input type="checkbox"/> Otro
Sección II:		
¿Presenta esta queja en su propio nombre?	<input type="checkbox"/> Sí*	<input type="checkbox"/> No
<i>* Si respondió afirmativamente a esta pregunta, pase a la sección III.</i>		
En caso contrario, indique el nombre y la relación con la persona por la que reclama.		
Por favor, explique el motivo por el que ha presentado la queja en nombre de una tercera persona:		
Confirme que ha obtenido la autorización de la parte agraviada si presenta la queja en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Sección III:		
Creo que la discriminación que sufrí se basó en (marque todo lo que corresponda):		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad de origen		
Fecha de la supuesta discriminación (mes, día, año): _____		
Explique lo más claramente posible lo que sucedió y por qué considera que fue víctima de discriminación. Describa a todas las personas implicadas. Incluya el nombre y la información de contacto de la(s) persona(s) que le discriminó (si las conoce), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el reverso de este formulario.		
Sección VI:		
¿Ha presentado anteriormente una queja en relación con el Título VI ante esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No

En caso afirmativo, suministre cualquier información de referencia sobre su reclamo anterior.

Sección V:

¿Ha presentado esta queja ante algún otro organismo federal, estatal o local, o ante algún tribunal federal o estatal?

Sí No

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal: _____
 Tribunal Federal: _____ Agencia Estatal: _____
 Tribunal Estatal: _____ Agencia Local: _____

Por favor, suministre información sobre una persona de contacto en el organismo/tribunal donde se presentó la denuncia.

Nombre:

Cargo:

Agencia:

dirección:

Teléfono:

Sección VI:

Nombre de la agencia contra la que se presenta la queja:

Nombre de la persona contra la que se presenta la queja:

Cargo:

Ubicación:

Número de teléfono (si lo conoce):

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja. A continuación se requiere su firma y la fecha

Firma

Fecha

Presente este formulario en persona en la dirección indicada a continuación, o envíelo por correo a:

Independence Plus, Inc.
Director asociado
3150 N 35th Ave, Ste 2
Phoenix, AZ 85017
(602) 702-1593

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.

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

Independence Plus has not had any Title VI complaints, investigations, or lawsuits in 2020, 2021, & 2022.

Public Participation Plan

Independence Plus Public Participation Plan



“Serving the Special Needs of Arizona”

Independence Plus, Inc. (IPI) provides limited transit services solely to persons who are enrolled in its programs. Individuals are referred to Independence Plus programs through the Arizona Department of Economic Security/Division of Developmental Disabilities. For individuals who have Limited English Proficiency (both current participants and prospective participants), Independence Plus, Inc. provides the following alternatives to assist them: 1) Independence Plus, Inc. has a diverse staff representing multiple nationalities who can be used for purposes of translation when necessary. 2) Independence Plus will make all Public Notices, Complaint Procedures and Complaint Forms available in Spanish. IPI can, when necessary, provide its literature in additional alternative languages. Independence Plus website utilizes Google translator and can be translated into Spanish (and many other languages as needed). Independence Plus, Inc. (IPI) provides marketing and outreach to the community in the following manner:

- IPI participates in outreach via community partners and school transition fairs
- IPI provides a quarterly newsletter
- IPI belongs to a variety of members organizations and associations such as AAPPD
- IPI also utilizes the Facebook social platform.
- IPI has a very limited marketing and advertising budget

Independence Plus, Inc. (IPI) participates in the Maricopa Association of Governments (MAG) outreach meetings but does not engage directly in transit planning or decision-making.

- (1) 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.
- (2) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

Limited English Proficiency Plan

Independence Plus

Limited English Proficiency Plan



“Serving the Special Needs of Arizona”

Independence Plus 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'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 updates. In developing the plan while determining the Independence Plus' extent of obligation to provide LEP services, Independence Plus 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 service area who may be served or likely to encounter by Independence Plus' program, activities, or services
- 2) The frequency with which LEP individuals come in contact with an Independence Plus' services
- 3) The nature and importance of the program, activities or services provided by the Independence Plus to the LEP population; and,
- 4) The resources available to Independence Plus 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.

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
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) 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.

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

Monitoring for Subrecipient Title VI Compliance

Independence Plus does not have any subrecipients and therefore no compliance monitoring for Subrecipient Title VI.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate based on race, color, or national origin, against persons who may, because 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.

Independence Plus (IPI) has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed.

Board Approval for the Title VI Program

Independence Plus, Inc Board of Directors Meeting

April 26, 2023

ZOOM Meeting called to order 11:08 AM.

Meeting attendees: David Brieno, Gregory Triandafilou, Paula Kawasaki, Victoria Turns, and Thomas Schell

Minutes from 1/25/2023 Board meeting were read and unanimously approved.

Old Business

- (Redacted)

Financials

- (Redacted)
- P&L statement reviewed and unanimously approved.
- Balance Sheet unanimously approved.

Highlights from Associate Director's Report

- (Redacted)
- The \$13,000 government transportation grant (if awarded) to cover re-imbursement for van maintenance /repairs for Section 5310 vehicles would require that IPI contribute 20% toward covered expenses.
- **Title VI update for the City of Phoenix was discussed and unanimously approved.** Associate Director, Gregory Triandafilou, did not vote since he is not a board member.
- (Redacted)

The meeting adjourned at 11:57AM.

Next meeting to be held via ZOOM at **11:00AM** on Wednesday, **July 19, 2023.**