

---

# *Title VI Implementation Plan*

---



NATIVE AMERICAN CONNECTIONS

# Contents

---

Title VI Policy Statement .....	3
Title VI Notice to the Public.....	4
Title VI Notice to the Public -Spanish .....	5
Title VI Complaint Procedures.....	6
Title VI Complaint Form.....	7
Title VI Investigations, Complaints, and Lawsuits .....	11
Public Participation Plan.....	12
Limited English Proficiency Plan.....	13
Non-elected Committees Membership Table .....	14
Title VI Equity Analysis.....	14
Board Approval for the Title VI Program.....	14

# Title VI Policy Statement

---

The Native American Connections 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 Native American Connections sponsored program or activity. There is no distinction between the sources of funding.

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

When Native American Connections distributes Federal-aid funds to another entity/person, Native American Connections will ensure all subrecipients fully comply with Native American Connections Title VI Nondiscrimination Program requirements. The President/CEO has delegated the authority to the Director of Human Resources as Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



---

Diana Yazzie Devine, President/CEO

# Title VI Notice to the Public

---

## Notifying the Public of Rights Under Title VI Native American Connections

The Native American Connections 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 Native American Connections.

For more information on the Native American Connection's civil rights program, and the procedures to file a complaint, contact Human Resources at 602-254-3247; (TTY 602-648-9773); email [NACHR@nativeconnections.org](mailto:NACHR@nativeconnections.org); or visit our administrative office at 4520 N. Central Avenue, Ste. 600 Phoenix AZ 85012. For more information, visit [www.nativeconnections.org](http://www.nativeconnections.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 602-254-3247. Para información en Español llame: Native American Connections, 602-254-3247.

# Title VI Notice to the Public -Spanish

---

## **Aviso al Público Sobre los Derechos Bajo el Título VI Native American Connections**

Native American Connections (*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 Native American Connection's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Human Resources, 602-254-3247, (TTY 602-648-9773); o visite nuestra oficina administrativa en 4520 N. Central Avenue, Ste. 600 Phoenix AZ 85012. Para obtener más información, visite [www.nativeconnections.org](http://www.nativeconnections.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. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in the following locations: Native American Connections Administrative Office, 4520 N. Central Avenue, Ste. 600 Phoenix AZ 85012.*

*This notice is posted online at [www.nativeconnections.org](http://www.nativeconnections.org)*

# Title VI Complaint Procedures

---

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any Native American Connections program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with Native American Connections. This anti-discrimination protection also extends to the activities and programs of NAC third party contractors. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes, Native American Connections must ensure 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 subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged non-compliance with Title VI and related statutes may be lodged with Native American Connections. Any such complaint must be filed within 180 day of the alleged discriminatory act (or latest occurrence). To submit a claim by mail or in person, please fill out the printable complaint form and mail/take to:

Native American Connections  
Human Resources  
4520 North Central Avenue, Ste. 600  
Phoenix AZ 85012  
602-254-3247  
NACHR@nativeconnections.org

## Complaint Processing

1. NAC shall investigate the complaint and attempt to resolve the issue within a reasonable period of time. For the purposes of this policy, a reasonable time generally means within five business days and in accordance with the urgency of the concern, but no longer than 30 days.
2. NAC makes every attempt to resolve all complaints in a culturally and linguistically appropriate manner for the individual.
3. NAC staff communicates the resolution of the complaint to the applicable parties, including regulatory agencies as appropriate.

## NAC Staff Training

1. NAC staff will be instructed that they may not prohibit, discourage or interfere with an individual attempting to voice a concern or complaint.
2. NAC staff will be instructed on accepting and resolving complaints in a professional, courteous, culturally relevant, and timely manner.
3. NAC staff will not retaliate against any person who files a complaint.

After the complaint is processed Native American Connections will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for the region, is responsible for monitoring this process.

# Title VI Complaint Form

<b>Section I:</b>		
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
<b>Section II:</b>		
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 <b>Section III</b>.</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
<b>Section III:</b>		
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.		
_____		
_____		
_____		
<b>Section VI:</b>		
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:

Native American Connections Human Resources  
4520 North Central Avenue, Ste. 600  
Phoenix, AZ 85012  
602-254-3247

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

Native American Connections Human Resources  
4520 North Central Avenue, Ste. 600  
Phoenix, AZ 85012  
602-254-3247

# 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?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

✓ Native American Connections has not had any Title VI complaints, investigations, or lawsuits.

## Public Participation Plan

---

# *Native American Connections Public Participation Plan*

---

Native American Connections provides limited transit services for residents living at a Native American Connections Permanent Supportive Housing community and clients enrolled in residential treatment services. Individuals utilizing transit services are elderly and/or disabled and all transit services are coordinated through the resident's or client's case manager.

Native American Connections' Permanent Supportive Housing Communities meet the needs of very low income and chronically homeless individuals who are in need of additional supports in order to maintain housing stability. Housing applicants are referred to Native American Connections primarily through the Maricopa Coordinated Entry System. All applicants must provide written documentation of homelessness and permanent disability, as well as being assessed prior to being placed on the waitlist. Other occupancy restrictions may apply.

Native American Connections offers substance use treatment and general mental health services including psychiatric evaluation, medication management, counseling and case management. The agency also offers residential treatment for substance use and co-occurring disorders. Licensed by the Arizona Department of Health Services in 1978, NAC has partnerships with State Regional Behavioral Health Authority (RBHA), Tribal RBHAs, Tribes, and Indian Health Services (IHS).

Native American Connections provides marketing and outreach to the community through community partners, provider fairs and Native American community events. The agency belongs to a variety of member organizations and associations. Native American Connections uses social media platforms including facebook, Twitter, LinkedIn, and YouTube. The agency has a limited marketing and advertising budget.

Native American Connections participates in the Maricopa Association of Governments (MAG) outreach meeting but is not a part of transit planning or decision making.

# Limited English Proficiency Plan

---

## *Native American Connections Limited English Proficiency Plan*

---

Native American Connections is committed to being responsive to the unique cultural, ethnic, and linguistic characteristics of the population it serves. As such, NAC has adopted the National Standards on Culturally and Linguistically Appropriate Services (CLAS) standards to support a more consistent and comprehensive approach to cultural and linguistic competence in service delivery.

### A. Accessing Oral Interpretation Services

1. NAC makes oral interpretation services available to persons with Limited English Proficiency (LEP) at all points of contact. Oral interpretation services are provided at no charge to AHCCCS eligible persons and Non-Title XIX/XXI persons determined to have a Serious Mental Illness (SMI). Individuals are provided with information instructing them how to access these services.

### B. Language Assistance Competence

1. NAC ensures the competence of employees providing language assistance services by requiring staff to complete language proficiency testing with a reputable language proficiency testing agency.
2. Test results are sent directly to the HR Department showing the employee's level of competency.
3. Test results are stored in the personnel record.
4. Once testing is complete and competency is confirmed, employees may provide language assistance services within the area of their competency.

### **Safe Harbor Provision**

Native American Connections 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

## **Non-elected Committees Membership Table**

---

Native American Connections 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.

Native American Connections has no current or anticipated plans to develop new transit facilities covered by these requirements.

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

---

The Native American Connections Title VI policy was adopted at the Annual Board Meeting held on October 4, 2017.