
Title VI Implementation Plan

*FOOTHILLS CARING CORPS,
INC.*

*December 20, 2018-
December 20, 2021*

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Title VI Policy Statement

The Foothills Caring Corps, Inc. 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, national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any Foothills Caring Corps, Inc. sponsored program or activity. There is no distinction between the sources of funding.

The Foothills Caring Corps, Inc. 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, Foothills Caring Corps, Inc. will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Foothills Caring Corps, Inc. distributes funds to another entity/person, Foothills Caring Corps, Inc. will ensure all subrecipients fully comply with Foothills Caring Corps, Inc. Title VI Nondiscrimination Program requirements. The Foothill Caring Corps Board of Directors has delegated the authority to Debra Determan, Executive Director, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.


Jil Ford
Jil Ford, Board Chair

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI **FOOTHILLS CARING CORPS, INC.**

The Foothills Caring Corps, Inc. operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Foothills Caring Corps, Inc.

For more information on Foothills Caring Corps, Inc.'s Civil Rights Program, and the procedures to file a complaint, contact Executive Director Debra Determan, (480) 488-1105; or email debrad@foothillscaringcorps.com; or visit our administrative office at 7275 E. Easy Street Suite B-103, Carefree, AZ 85377. For more information, visit www.foothillscaringcorps.com.

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 Debra Determan at 480-488-1105. Para información en Español llame: Debra Determan at 480-488-1105.

The above notice is posted in the following locations:

- *our website: <https://foothillscaringcorps.com/about/title-vi-notices>;*
- *posted in our front office at the receptionist area;*
- *in our vans.*

Title VI – Aviso al Publico

Aviso al Público Sobre los Derechos Bajo el Título VI Foothills Caring Corps, Inc.

The Foothills Caring Corps, Inc. 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 pais de origen.

Para obtener más información sobre la Foothills Caring Corps, Inc.'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Debra Determan, Executive Director at (480) 488-1105, o visite nuestra oficina administrativa en 7275 E Easy Street Suite B-103, Carefree, AZ 85377. Para obtener más información, visite www.Foothillscaringcorps.com.

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:

- our website: <https://foothillscaringcorps.com/about/title-vi-notices>;
- posted in our front office at the receptionist area;
- in our vans.

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Foothills Caring Corps, Inc. may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form or by calling the Foothills Caring Corps office. All complaints received by the Foothills Caring Corps, Inc. will be investigated according to federal standards. The Foothills Caring Corps Title VI Complaint Form (English and Spanish) is located on our website: www.foothillscaringcorps.com. The form is available in both English and Spanish. Complaints can also be filed by contacting the Foothills Caring Corps office at: 480-488-1105.

The Foothills Caring Corps, Inc. has 30 days to investigate each complaint. If more information is needed to resolve the case, the Foothills Caring Corps 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 the Foothills Caring Corps office.

Title VI Complaint Form - English

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:		
<p>I believe the discrimination I experienced was based on (check all that apply):</p> <p><input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin</p> <p>Date of Alleged Discrimination (Month, Day, Year): _____</p> <p>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.</p> <p>_____</p> <p>_____</p> <p>_____</p>		
Section VI:		
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>If yes, please provide any reference information regarding your previous complaint.</p> <p>_____</p> <p>_____</p>		
Section V:		
<p>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, check all that apply:</p> <p><input type="checkbox"/> Federal Agency: _____</p> <p><input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____</p> <p><input type="checkbox"/> State Court : _____ <input type="checkbox"/> Local Agency: _____</p>		
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:
 Foothills Caring Corps, Inc., Debra Determan, Executive Director
 7275 E. Easy Street, Suite B-103
 Carefree, AZ 85377
 (480) 488-1105
 Debbrad@foothillscaringcorps.com

A copy of this form can be found online at www.foothillscaringcorps.com

Title VI Complaint Form - Spanish

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) _____

¿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:

Foothills Caring Corps, Inc., Debra Determan, Executive Director
7275 E. Easy Street, Suite B-103
Carefree, AZ 85377
(480) 488-1105
Debrad@foothillscaringcorps.com

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.

× Foothills Caring Corps, Inc. has not had any Title VI complaints, investigations, or lawsuits since our founding in 1999.

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

*Foothills Caring Corps,
Inc.*

*Public Participation
Plan*

The Foothills Caring Corps, Inc. is engaging the public 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, Foothills Caring Corps, Inc., made the following community outreach efforts:

FCC vans continue to be used by local churches, and other community agencies. We held trainings for the volunteers from our community agencies that use our vehicles. This allows them to be drivers under our insurance policy by completing all our requirements to drive our vans safely and wisely.

The FCC supported the two local coordinating Libraries in coordinating bringing seniors to their programs. Provided FCC vans for field trips to the Scully Learning Center Foundation for young adults with disabling conditions.

In the upcoming year, Foothills Caring Corps, Inc. will make the following community outreach efforts:

Will share our vans with other agencies or municipalities.

Will continue to hold trainings for the volunteers from our community agencies that use our vehicles.

Will attend FCC NE Regional Quarterly meetings with other area non-profits, faith communities and businesses to network and share opportunities and resources.

Will support our NE Valley Community Health and Wellness Expo Event by providing transportation for home bound older adults and running a shuttle for participants.

Public Meetings:

- (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.

The Foothills Caring Corps, Inc. submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

Limited English Proficiency Plan

Foothills Caring Corps, Inc.

Limited English Proficiency Plan

The Foothills Caring Corps, 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 the Foothills Caring Corps, Inc. 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. The Foothills Caring Corps adopts the City of Phoenix Language Assistance Plan.

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

The Foothills Caring Corps, Inc. 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

The Foothills Caring Corps will continue to abide by Title VI guidelines to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:

- Continue to provide for interpreters as needed, in Spanish and any other language requested in accordance with Title VI guidelines.
- Maintain regular communication with front line staff regarding their experience with the LEP clients in order to assess the assistance provided.
- Continue to translate important notices and major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population.
- Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

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
Population	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
FCC Governing Board of Directors	100%				

× Foothills Caring Corps, 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.

A. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Additionally, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

B. Background

N/A - No Facility is proposed.

C. Analysis

For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating an agency in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze

alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Board Approval for the Title VI Program

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

Executive Board

Jill Ford, President
June Reilly, Vice President
Louis Matusiak, Treasurer
Norman Jacobs, Secretary

Debra Determan
Executive Director



Board of Directors

James Bonanno, Jr.
Dr. Paul Dale
O. Burtch Drake
Pastor Mike Johnson
George Schmid
Sabina Schwan
Leslie Seldin
Laurie Stine
Madison Wetter

**Foothills Caring Corps Board of Directors Meeting
December 20, 2019 at 9:00am**

From the Foothills Caring Corps Board Meeting Minutes, December 20, 2018:

The Title VI Plan was Item # 6 on the Foothills Caring Corps Board Meeting Agenda. Revisions to the Title VI Plan for 2018-2021 - primarily the removal of the ADA language - was presented to the Board by Debra Determan, Executive Director of the Caring Corps. The Board discussed the revised Title VI Plan at length.

A motion to approve the revised Title VI Plan for 2018-2021 was made by Board Member Binka Schwan and seconded by Board Member June Reilly. The Title VI Plan was approved unanimously by the Board.

The Title VI Plan Policy statement was signed by Board President, Jill Ford, following the meeting on December 20, 2018.

Foothills Caring Corps, Inc.

7275 E. Easy Street Suite B103, P.O. Box 831, Carefree, AZ 85377
480.488.1105 fax 480.488.8117 Services@FoothillsCaringCorps.com

FoothillsCaringCorps.com