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# *Title VI Implementation Plan*

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**2017**



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# Title VI Policy Statement

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The Lura Turner Homes, 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 Lura Turner Homes sponsored program or activity. There is no distinction between the sources of funding.

Lura Turner Homes 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, Lura Turner Homes will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Lura Turner Homes distributes Federal-aid funds to another entity/person, Lura Turner Homes will ensure all subrecipients fully comply with Lura Turner Homes Title VI Nondiscrimination Program requirements. The Executive Director has delegated the authority to Dixie Tribble, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Bob Dubasik President

NAME AND TITLE OF HIGHEST RANKING OFFICAL

# Title VI Notice to the Public

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## Notifying the Public of Rights Under Title VI Lura Turner Homes

Lura Turner Homes 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 Lura Turner Homes.

For more information on the Lura Turner Homes' civil rights program, and the procedures to file a complaint, contact Dixie Tribble 602-943-4789, email [dixiet@luraturnerhomes.org](mailto:dixiet@luraturnerhomes.org) or visit our administrative office at 8640 N. 19<sup>th</sup> Ave #14, Phoenix, AZ 85021. For more information, visit [www.luraturnerhomes.org](http://www.luraturnerhomes.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 602-943-4789. Para información en Español, llame: 602-943-4789.

# Title VI Notice to the Public - Spanish

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## **Aviso al Público Sobre los Derechos Bajo el Título VI Lura Turner Homes**

Lura Turner Homes (*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 Lura Turner Home's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Dixie Tribble 602-943-4789; o visite nuestra oficina administrativa en 8640 N. 19<sup>th</sup> Ave #14, Phoenix, AZ 85021. Para obtener más información, visite [www.luraturnerhomes.org](http://www.luraturnerhomes.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: Office, website & group homes. (Office) 8640 N 19<sup>th</sup> Ave #14 phoenix, AZ 85021 (Civitan house) 5038 N. 17<sup>th</sup> Ave Phoenix, AZ 85015 (Lynwood House) 317 W. Lynwood Phoenix, AZ 85003 (Marlette House) 4001 W. Marlette Phoenix, AZ 85019*

# Title VI Complaint Procedures

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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 Lura Turner Homes, Inc. program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with the Lura Turner Homes. This anti-discrimination protection also extends to the activities and programs of Lura Turner Homes 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, Lura Turner Homes. must ensure that no person shall of 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 the Administrative Assistant. 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:

Executive Director  
Address: 8640 N 19<sup>th</sup> Ave # 14 Phoenix AZ 85021  
Email: [dixiet@luraturnerhomes.org](mailto:dixiet@luraturnerhomes.org)  
Phone: 602-943-4789

Complaints received by Lura Tuner Homes will be investigated in accordance with Federal standards (28CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed Executive Director 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.

## Procedures for Tracking and Investigating Title VI Complaints

### **Tracking**

Complaint comes in to Lura Turner Homes administrative office and is logged into the Lura Turner Homes Title VI Complaint Log (the log). The Administrator is responsible for ensuring that information is complete, that all appropriate parties are notified with 24 hours for the closure of the complaint. Lura Turner Homes will audit complaints to ensure appropriate notifications and closure.

### Investigating

STEP ONE: Summary of the complaint, completed by Lura Turner Homes.

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 investigations.

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)
- Maintenance (Staff/Records)
- Witnesses
- Complainant (Interview/History)
- Spotter reports
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other Lura Turner Homes 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
- Lura Turner Homes 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 violation(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 follow-up action plan.
- If no violation found, not policies, procedures, etc. reviewed with operator.  
Never state “no action taken”.



# 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
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.

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**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:  
Lura Turner Homes Title VI Coordinator  
8640 N. 19<sup>th</sup> Ave #14  
Phoenix, AZ 85021  
602-943-4789

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

# Title VI Complaint Form - Spanish

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## 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) \_\_\_\_\_

### ¿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 Federal \_\_\_\_\_ Agencia Estatal \_\_\_\_\_  
Corte Estatal \_\_\_\_\_ Agencia Local \_\_\_\_\_

**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:**

Lura Turner Homes Title VI Program  
Dixie Tribble Administration Assistant  
8640 N. 19<sup>th</sup> Ave #14, Phoenix, AZ 85021  
Phone: 602-943-4789 Fax: 602-795-5759  
dixiet@luraturnerhomes.org

# 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)				

Lura Turner Homes has not had any Title VI complaints, investigations, or lawsuits in 2016-2017.

*Lura Turner Homes  
Public Participation  
Plan*

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Lura Turner Homes 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, Lura Turner Homes made the following community outreach efforts:

[www.luraturnerhomes.org](http://www.luraturnerhomes.org)

a quarterly newsletter is mailed and posted on the website

a LTH story is available upon request

In the upcoming year Lura Turner Homes will make the following community outreach efforts:

These communications are ongoing.

#### **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.

Lura Turner Homes submits to the City of Phoenix and MAG 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

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# Lura Turner Homes

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## *Limited English Proficiency Plan*

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Lura Turner Homes adopts the City of Phoenix Language Access Plan which can be found at the end of this document.



Lura Turner Homes 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 Lura Turner Homes 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 Lura Turner Home's extent of obligation to provide LEP services, the Lura Turner Homes 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 Lura Turner Homes service area who may be served or likely to encounter by Lura Turner Homes program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an Lura Turner Homes services;
- 3) The nature and importance of the program, activities or services provided by the Lura Turner Homes to the LEP population; and
- 4) The resources available to Lura Turner Homes and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Every effort will be made to provide vital information to LEP individuals in the language requested.

#### **Safe Harbor Provision**

Lura Turner Homes 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

# Non-elected Committees Membership Table

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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.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American

X Lura Turner Homes does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Subrecipient Title VI Compliance

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DESCRIBE HOW YOU MONITOR YOUR SUBRECIPIENTS. This can be through site visits, submissions of Title VI Plans annually, or training and surveys

X Lura Turner Homes does NOT monitor subrecipients for Title VI compliance.

# Title VI Equity Analysis

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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.***

The Lura Turner Homes has no current or anticipated plans to develop new transit facilities covered by these requirements.

# Board Approval for the Title VI Program

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Minutes of the April 16, 2018 Board Meeting

Members:	Present	Excused Absence	Unexcused Absence
Chris Brinkerhoff	X		
Don Campbell		X	
Ron DaVella	X		
Bob Dubasik			
Eileen Gannon	X		
Steve Gerst	X		
Cinda Glenn		X	
Larry Lake	X		
Becky Stingle	X		

**Administration Present:** Max McQueen

**New Business:**

**Title VI Program**

The program was discussed at the March 22, 2018 board meeting and the Board agreed to continue with the program.

Motion was submitted to all board members and approved 4/13/2018.

Respectfully submitted,

Becky Stingle  
Secretary

Revised 8-20-2020