
Title VI Implementation Plan

March 21, 2024 to March 21, 2027



LURA TURNER HOMES
for Developmentally Disabled Adults

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Attachments:

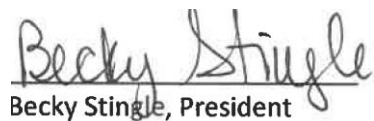
1. List of Annual events for 2024
2. List of Board Meetings 2024
3. LTH Story
4. Christmas Newsletter 2023

Title VI Policy Statement

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

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

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



Becky Stingle

Becky Stingle, President

Title VI Notice to the Public - English

Notifying the Public of Rights Under Title VI Lura Turner Homes, Inc. Dixie Tribble

Lura Turner Homes, Inc. Dixie Tribble 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 the Lura Turner Homes, Inc. Dixie Tribble

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

The above notice is posted in the following locations:

Office - 8640 N. 19th Ave Phoenix, Az 85021 **Civitan** - 5038 N. 17th Ave. Phoenix, AZ 85015

Lynwood - 317 W. Lynwood Phoenix, Az 85003 **Marlette** - 4001 W. Marlette Phoenix, AZ 85019

*This is posted in all vehicles and on our **Website** www.luraturnerhomes.org*

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Lura Turner Homes, Inc. Dixie Tribble

Lura Turner Homes, Inc. Dixie Tribble (*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 Homes, Inc. Dixie Tribble 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. 19th Ave #14, Phoenix, AZ 85021. Para obtener más información, visite 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. 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

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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 Lura Turner Homes, Inc including consultants, contractors and vendors. Intimidation or retaliation as a result 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 Lura Turner Homes, Inc will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Lura Turner Homes, Inc or submitted to the State or Federal authority for guidance.
- (7) Lura Turner Homes, Inc 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) Lura Turner Homes, Inc 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 Lura Turner Homes, Inc 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.luraturnerhomes.org

Title VI Complaint Form in English

TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at csr@valleymetro.org.

SECTION 1: CUSTOMER INFORMATION

First Name: _____ Last Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Home Phone: _____ Cell Phone: _____
Email: _____ Preferred method of contact: Phone Email

SECTION 2: INCIDENT INFORMATION

Date of Incident: _____ Time of Incident: _____ AM PM City: _____
Incident Location: _____ Direction of Travel: _____
Route #: _____ Bus/Light Rail/Streetcar #: _____
Service Type: Local Bus Express/RAPID Circulator/Connector Light Rail Streetcar Dial-a-Ride
Operator Name: _____
Operator Description: _____
What was the discrimination based on (Check all that apply): Race Color National Origin Other _____

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? Yes No

If yes, please provide information about a contact person at the FTA where the complaint was filed:

Name: _____ Title: _____
Address: _____ Phone: _____

Have you previously filed a Title VI complaint with this agency? Yes No

Signature and date required below:

Signature _____
Date _____



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 Lura Turner Homes 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 reclamante/s 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 reclamante/s y deben incluir el nombre, el domicilio y el número de teléfono del/los reclamante/s. 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 Lura Turner Homes 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 Lura Turner Homes o presentada a la autoridad estatal o federal para recibir su orientación.
- (7) La Lura Turner Homes 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 Lura Turner Homes 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 Lura Turner Homes 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: luraturnerhomes.org

Title VI Complaint Form in Spanish

FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) ó por correo electrónico a csr@valleymetro.org.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre: _____ Apellido: _____
Domicilio: _____
Ciudad: _____ Estado: _____ Código Postal: _____
Teléfono del Hogar: _____ Teléfono Celular: _____
Correo Electrónico: _____ Método preferido de contacto: Teléfono Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente: _____ Hora del Incidente: _____ AM PM Ciudad: _____
Ubicación del Incidente: _____ Dirección del Viaje: _____
Ruta #: _____ Autobús/Tren Ligero/Tranvía #: _____
Tipo de Servicio Autobús Local Express/RAPID Circulador/Conector Tren Ligero Tranvía Dial-a-Ride
Nombre del/la Operador/a: _____
Descripción del/la Operador/a: _____
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable):
 Raza Color Origen Nacional Otro _____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? Sí No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre: _____ Título: _____
Domicilio: _____ Teléfono: _____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? Sí No

Firma y fecha requeridas abajo:

Firma _____

Fecha _____



Title VI Investigations, Complaints, and Lawsuits

A separate Annual Title VI Report must be submitted each year by October 15th as a part of the Milestone Progress Reporting (MPR) data.

<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				
Lawsuits				
Complaints				

Lura Turner Homes, Inc. has not had any Title VI complaints, investigations, or lawsuits during the review period 2021-2024.

Lura Turner Homes, Inc.
Public Participation
Plan



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

1. WWW.luraturnerhomes.org

2. A quarterly newsletter is mailed and posted on our website.

3. The Executive Director will send out email blast every two months, to let the public know what is going on.

4. Facebook

5. Our Board meetings are on the fourth Thursday of every other month. This is posted on our website.

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

1. Newsletters
2. Website
3. Facebook
4. LTH Story

Up Coming Board Meeting for 2024

January 25, 2024

March 21, 2024

May 23, 2024

August 15, 2024

October 24, 2024

December 5, 2024

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, 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

Lura Turner Homes, Inc.

Limited English Proficiency Plan



Lura Turner Homes, 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 Lura Turner Homes, 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.

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

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.

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

Body	Caucasian	Latino	African American	Asian American	Native American

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

Monitoring for Subrecipient Title VI Compliance

Lura Turner Homes, Inc. does not monitor subrecipients for Title VI Compliance.

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 sub recipient organization receives any FTA dollars, it must comply with this requirement.

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

Board Approval for the Title VI Program

Lura Turner Homes, Inc.
Regular Board of Directors Meeting
Meeting Minutes
March 21, 2024

6:37 **Meeting called to order** by Becky.
Prayer led by Don Campbell
Mission Statement read by John Maddox
Minutes of 1-25-2024 approved

Members Present:

John Maddox	Larry Lake	Donna Bornmann
Don Campbell	Becky Stingle	Steve Gerst
By Zoom:		
Mark Feig	Catilin Ribeiro	Leroy Tapia
Bob Dubasik		

Administration Present:
Max McQueen

Guest: Pastor Michelle Nairn

Old Business:

Don presented printouts of the houses. Details of construction were discussed. We can look forward to seeing the new printouts at the next meeting.

Max addressed the COVID status. Homes are looking good.

Title IV Was reviewed. Don Campbell moved to accept it, Becky Stingle seconded. Presentation was approved. Becky signed it for presentation.

New Business:

Max also brought to our attention challenges that have surfaced in DES / ALTEC / AHCCCS.
Max introduced Michelle Nairn as a potential new board member. Max and Michelle left the room to allow for a vote. Don Campbell moved to accept her as a board member and Leroy Tapia seconded.
Welcome Michelle Nairn to our LTH family.

Reports:

Financial reports were discussed as presented.

8:38 Meeting adjourned