
Title VI Implementation Plan



Native
American
Connections

November 1, 2023 – October 31, 2026



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Title VI Policy Statement

The Native American Connections 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 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 Senior Director of Human Resources as the Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Trula Breuninger, President & CEO

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Native American Connections

Native American Connections 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 they have 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 Connections' 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; or visit our administrative office at 3216 N 3rd St, Phoenix, AZ 85012. For more information, visit 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. 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) 254-3247. Para información en Español llame: (602) 254-3247.

*The above notice is posted in the following locations and company vehicles as appropriate:
Native American Connections Administrative Office, 3216 N 3rd Street, Phoenix AZ 85012.*



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. El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre el programa de derechos civiles de Native American Connections, y los procedimientos para presentar una queja, contacte Recursos Humanos al (602) 254-3247, (TTY (602) 648-9773); o visite nuestra oficina administrativa en 3216 N 3rd Street, Phoenix AZ 85012. Para obtener más información, visite www.nativeconnections.org

Se puede presentar una queja directamente con la Oficina de Transito Publico de la Ciudad de Phoenix o con la Administración de Transito Federal (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Derechos Civiles:

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 se publica en las siguientes ubicaciones y vehículos de la compañía, según corresponda: Oficina Administrativa de Native American Connections, 3216 N 3rd Street, Phoenix AZ 85012.



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 Native American Connections 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 they have 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 them to complete, sign and return for processing.
- (6) Once submitted Native American Connections will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing them whether the complaint will be investigated by Native American Connections or submitted to the State or Federal authority for guidance.
- (7) Native American Connections 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) Native American Connections 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 sixty 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 thirty business days, the Authority can administratively close the

case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

(9) After the investigator reviews the complaint, they 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, they have 30 days after the date of the letter or the LOF to do so.

(10) A complainant dissatisfied with Native American Connections' decision may file a complaint directly with:

- 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.nativeconnections.org

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 Native American Connections, 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 los reclamantes se hayan 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 los reclamantes y deben incluir el nombre, el domicilio y el número de teléfono de los reclamantes. Si es necesario, la persona de contacto del Título VI ayudará a los reclamantes 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 de los reclamantes y la intención de proceder con la/s queja/a. Para ello, se requiere que los reclamantes envíen 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 a los reclamantes para su confirmación o revisión antes de su procesamiento. Se remitirá una forma de la queja a los reclamantes para que la complete, la firme y la devuelva para su procesamiento.
- (6) Una vez presentada, Native American Connections 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 Native American Connections o presentada a la autoridad estatal o federal para recibir su orientación.
- (7) Native American Connections 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) Native American Connections tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con los reclamantes. Los reclamantes tienen 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 los reclamantes 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 los reclamantes ya no desean 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 los reclamantes desean apelar a la decisión, tienen 30 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Los reclamantes insatisfechos con la decisión de la Native American Connections pueden 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,
 - 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.nativeconnections.org

Native American Connections 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"/> TDD	<input type="checkbox"/> Audio Tape <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:

- Native American Connections Human Resources
3216 N. 3rd Street
Phoenix, AZ 85012
602-254-3247

A copy of this form can be found online at www.nativeconnections.org.

Forma de Queja de Acuerdo a Título VI

Nota: La siguiente información se necesita para procesar su queja.

Sección I : Información de la persona que está poniendo la queja:	
Nombre:	
Domicilio:	
Ciudad/Estado/ Código Postal:	
Teléfono (Casa):	
Teléfono (Trabajo):	
Sección II: Persona A La Que Se Discriminó (alguien que no sea la persona que está poniendo la queja)	
Nombre:	
Domicilio:	
Ciudad/Estado/ Código Postal:	
Teléfono (Casa):	
Teléfono (Trabajo):	
Sección III: ¿Cuál de las siguientes razones describe por lo que usted siente que se le discriminó?	
Yo creo haber sido discriminado(a) por (marque todo lo que aplica): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad	
¿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. _____ _____ _____	
Sección IV: ¿Ha presentado esta queja con esta agencia? <input type="checkbox"/> Si <input type="checkbox"/> No	
Por favor provee los datos de la queja anterior. _____ _____ _____	
Sección V: ¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal?	

<input type="checkbox"/> Si <input type="checkbox"/> No Si su respuesta es sí, marque todo lo que aplique: <input type="checkbox"/> Agencia Federal: _____ <input type="checkbox"/> Corte Estatal: _____ <input type="checkbox"/> Corte Federal: _____ <input type="checkbox"/> Agencia local: _____ <input type="checkbox"/> Agencia local: _____
Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.
Nombre:
Domicilio:
Ciudad/Estado/ Código Postal:
Teléfono (Casa):
Teléfono (Trabajo):
Sección VI:
Nombre de la agencia de cual presenta su queja:
Nombre de la persona de la persona:
Título:
Localidad:
Teléfono:

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

Someta la forma y cualquier información adicional a:

- Native American Connections Human Resources
3216 N. 3rd Street
Phoenix, AZ 85012
602-254-3247

Una copia de esta forma se puede encontrar en línea: www.nativeconnections.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.

<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				

Native American Connections has not had any Title VI complaints, investigations, or lawsuits during the review period 10/2/2020- Present.



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 Regional Community of Care 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 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

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

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.

Monitoring for Subrecipient Title VI Compliance

Native American Connections does not have subrecipients and therefore do not monitor subrecipients.

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.

Board Approval for the Title VI Program

The Native American Connections Title VI policy was adopted at a Board Meeting held on 12/20/2023. Approved minutes attached.

**NATIVE AMERICAN CONNECTIONS
BOARD OF DIRECTOR’S MEETING**

MOTION TO APPROVE TITLE VI IMPLEMENTATION PLAN

Motion: by Paul Mountain
Second: by Brain Greathouse
Motion Carried: Unanimous



NATIVE AMERICAN CONNECTIONS

BOARD OF DIRECTORS MINUTES

December 20th, 2023
Native American Connections
3216 N 3rd St.
Phoenix, AZ 85012

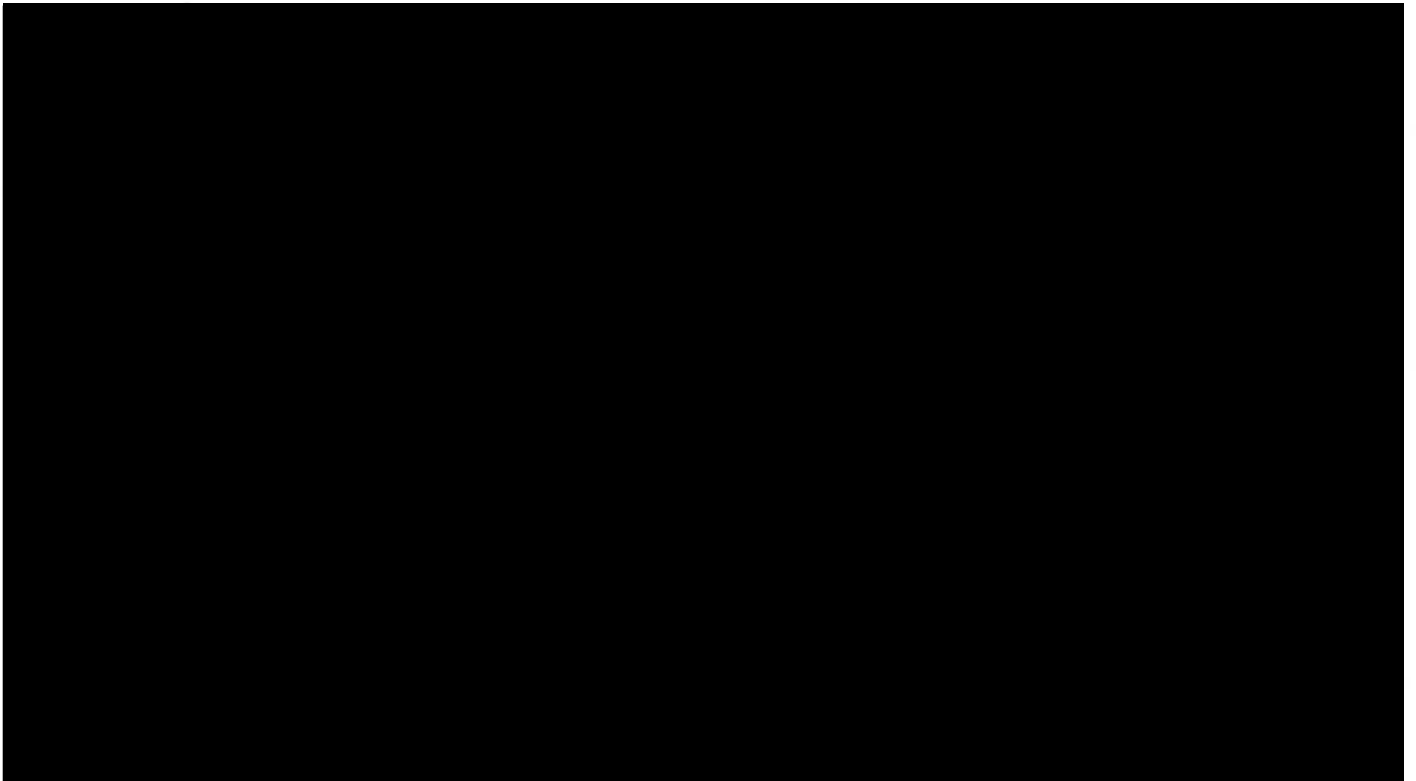
**SPECIAL MEETING OF THE BOARD OF DIRECTOR'S
VIA ZOOM CALL**


Present: Trula Breuninger, Clarissa Bizardie, Joe Keeper, Jennifer, Christopher Sharp, Dana Schmid, Michelle Hale, Paul Mountain, Brian Greathouse, Cherie McCabe, Violet Mitchell-Enos, Danielle DeRosa

MEETING CALLED TO ORDER 1:31pm

I. Introductions:

Christopher Sharp extended a warm welcome to everyone at the Special Meeting and introduced Resolutions: [REDACTED] Chris then invited Trula to commence the presentation on Resolutions [REDACTED] Trula acknowledged the presence of Board Members and invited Joe Keeper to provide additional information.





IV. Title VI Implementation Plan & Policy: John Godfrey introduced himself and welcomed the Board: I'm John Godfrey, COO of Native American Connections. I'm here to discuss our request for approval of our Title 6 implementation Plan and Policy. To provide some context, several years ago, we received funding from the City of Phoenix to purchase some properties, and as part of the agreement, we must demonstrate compliance with Title 6 of the Civil Rights Act of 1964. This ensures that we do not discriminate based on race, color, or national origin. Our plan, initially drafted three years ago, recently expired, and the City of Phoenix assisted us in updating it with minor changes. Each Board Member received a copy of the updated plan. If approved, it will be extended until November 31st, 2026. The plan outlines our commitment to non-discrimination and equal treatment in all our programs, irrespective of funding sources. We also ensure access to services for those with limited English proficiency. The President and CEO have delegated authority to our Senior Director of Human Resources as the Title 6 Program Coordinator, Anna Journey. The plan includes complaint processes, which, to date, we have not received any complaints. It is a requirement from the City of Phoenix that we present this to the Board. Any questions on our updated Title 6 plan?

No questions or comments were presented.

Chris Sharp: Thank you. Alright, if there are no questions or comments, we need a motion to approve the Title 6 Implementation Plan and Policy.

Brian Greathouse: I'll move.

Paul Mountain: I'll second

Chris Sharp: Great. All in favor?

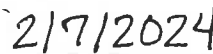
All Members Agreed.

Chris: Any opposed? The motion passes unanimously. Thank you.

V. Meeting Adjourn



NAC Board Secretary Signature



Date