

Title VI Plan Cover Page

People Who Care 2023

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Executive Summary

People Who Care (PWC) is a volunteer caregiving nonprofit organization that provides escorted transportation and non-medical assistance to adults who are not able to drive due to physical limitations such as vision loss, stroke, chronic illness, or age. All services are free of charge to the client and are provided from two offices: one in Prescott and one Chino Valley. Volunteers use their own vehicles to transport clients, door-through-door, to essential appointments such as for healthcare, legal and social services, and trips to care facilities to visit family members. The same escorted transportation assistance is provided for grocery shopping trips. Volunteers are required to remain with the client in the facilities except for appointments anticipated to be over two hours long or for confidential support group meetings.

People Who Care has been an ADOT 5310 grantee for the last seven years. Its organizational structure currently consists of a Board of Directors, currently consisting of 12 members, and the paid staff: Executive Director (1 FTE), Development Director (1 FTE), Program Manager (1 FTE), Program Coordinator (1 FTE), Project Coordinator (.5 FTE), Technology Coordinator (.5 FTE), Volunteer Coordinator (.5 FTE), Chino Valley Program Manager (.5 FTE), and Executive Assistant (.5 FTE).

What type of program fund(s) did you apply for?

- 5310
- 5311
- Other (please explain) _____

Type of Funding Requests? (Check all that apply)

- Vehicle Funds
- Operating Funds
- Other (please explain) _____

Is your agency receiving direct funds from FTA?

- If yes, please attach a copy of your FTA letter of approval of Title VI Plan.
- No

Non-Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA People Who Care

People Who Care operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **People Who Care**.

For more information on **People Who Care's** civil rights program, and the procedures to file a complaint, contact **Jane Harrison, Executive Director, 928-445-2480, email jane@peoplewhocareaz.com**; or visit our administrative office at **1580 Plaza West Drive, Prescott, AZ 86303**. For more information, visit **www.peoplewhocareaz.com**.

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator, 206 S. 17TH Ave, MD 155A, Phoenix AZ, 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave. SE, Washington DC 20590

If information is needed in another language, contact **Debbie Scherer at 928-445-2480..** *Para información en Español llame: **Debbie Scherer 928-445-2480.**

Non-Discrimination Notice to the Public

Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA People Who Care

People Who Care (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **People Who Care**, y los **928-445-2480**; o visite nuestra oficina administrativa en **1580 Plaza West Drive, Prescott, AZ 86303**. Para obtener más información, visite **www.peoplewhocareaz.com**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 206 S. 17th Ave, MD 155^a, Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations:

People Who Care - Prescott Office
1580 Plaza West Drive
Prescott, Arizona 86303

People Who Care – Chino Valley Office
735 E. Road 1 South
Chino Valley, AZ 86323

This notice is posted online at **www.peoplewhocareaz.com**

Non-Discrimination ADA/Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **People Who Care** 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, national origin, or disability may file a Discrimination 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 ADA/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 **People Who Care** 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 **People Who Care** or submitted to the State or Federal authority for guidance.

- (7) **People Who Care** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
- (8) **People Who Care** has 10 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 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 10 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 Discrimination 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.
- (10) A copy of either the closure letter or LOF must be also be submitted to ADOT within **72** hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with **People Who Care** decision may file a complaint with the Arizona Department of Transportation (**ADOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **ADOT**: ATTN ADA/Title VI Program Coordinator, 206 S. 17TH Ave, MD 155A, Phoenix AZ, 85007. **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave. SE, Washington DC 20590
- (12) A copy of these procedures can be found online at www.peoplewhocareaz.com.

If information is needed in another language, contact **Debbie Scherer at 928-445-2480**.

*Para información en Español llame: **Debbie Scherer 928-445-2480**.

Discrimination ADA/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"/> 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:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
<input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a Discrimination 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:

People Who Care

Jane Harrison, Executive Director

1580 Plaza West Drive, Prescott, AZ 86303

928-445-2480

jane@peoplewhocareaz.com

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

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

If no investigations, lawsuits, or complaints were filed select the option below.

People Who Care has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2022**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
Investigations						
1)						
2)						
Lawsuits						
1)						
2)						
Complaints						
1)						
2)						

Public Participation Plan

People Who Care 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, **People Who Care** made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.

- Expanded the distribution of agency brochures
- Advertised public announcements through newspapers, fliers, or radio
- Posted the Nondiscrimination Public Notices to the following locations:
 - Lobby of agency
- Partnered with other local agencies to advertise services provided
- Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities: <https://www.facebook.com/PeopleWhoCareAZ>
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochure.

People Who Care will make the following community outreach efforts for the **upcoming year**:

- Expand the distribution of agency brochures
- Advertise public announcements through newspapers, fliers, or radio
- Post the Nondiscrimination Public Notices to the following locations:
 - Lobby of agency
- Partner with other local agencies to advertise services provided.
- Host public information meetings and or hearings.
- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- Host an information booth at a community event
- List other: Community civic and outreach presentations when appropriate

Become a People Who Care Volunteer! (handout verbiage)

People Who Care volunteers provide caring, non-medical assistance for adults, helping them to continue living on their own in their communities.

There are People Who Care community programs in Prescott, Chino Valley, Prescott Valley and Dewey

Volunteering with People Who Care is an opportunity to help someone living in your community who is not able to drive anymore. It's a special opportunity for you to hear the stories of their rich life experiences and to share yours.

The essence of People Who Care is creating caring relationships with the Neighbors you are helping.

Volunteers do **what** they can, **when** they can. You choose how and when you want to help. Here are some of the ways our volunteers help our Neighbors:

- Transportation.
- Shopping assistance.
- Personal paperwork.
- Minor home repairs.
- Caregiver relief.
- Reassurance phone calls.
- Friendly visits.
- Home safety.

If you would like to volunteer for People Who Care, call the office at 928-445-2480, send us an email at prescottpwc@peoplewhocareaz.com or visit our website at www.Peoplewhocareaz.com.

We look forward to hearing from you!

- People Who Care sponsors *Confident Living Courses* for Vision Loss and for Hearing Loss for Quad-City residents each year and bi-monthly Stroke Support Groups.
- People Who Care is certified each year as a **Qualified Charitable Organization for the Arizona Tax Credit**.

For additional information, call 928-445-2480.

People Who Care Would Like You to Know

Main Office: 928-445-2480 Website: peoplewhocareaz.com

- A nonprofit volunteer caregiving organization providing non-medical assistance to adults who are no longer able to drive due to age-related and physical limitations in order to help them to continue living at home and in their community
- Incorporated as a 501(c)(3) tax deductible organization in 1992.
- Two program locations: Chino Valley and Prescott
- Client enrollment involves a telephone interview and home visit.
- One to one volunteer assistance provided free of charge
- Limited English translation assistance for Spanish speaking residents available
- Prospective volunteers attend an information meeting followed by a personal staff application interview, reference calls and appropriate background screening.
- In 2018, 403 individual client Neighbors received assistance throughout the year, often numerous times a month.
- Volunteers provide door-through-door assistance when helping with rides and, in almost all situations, stay with the Neighbor while helping with the assignment.
- Volunteers help with:
 - Essential Transportation
 - Grocery Shopping
 - Personal Paperwork
 - Family Caregiver Relief
 - Reassuring Phone Calls
 - Friendly Home Visits
 - Home Safety
 - 911 Emergency Call Units
- Volunteer mileage reimbursement available when client's assignment requires essential transportation to an adjacent community.
- Volunteer assignment opportunities to help a specific Neighbor on an ongoing basis
- Free *Confident Living with Low Vision* Courses offered to residents each year.
- A community Support Group for Stroke Survivors & Caregivers held twice a month
- People Who Care is a **Qualified Charitable Organization for the Arizona Tax Credit.**

Limited English Proficiency Plan

People Who Care 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 **People Who Care** 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 **People Who Care's** extent of obligation to provide LEP services, **People Who Care** 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 **People Who Care** service area who may be served or likely to be encounter by **People Who Care** program, activities, or services;

	Yavapai County, Arizona	
	Estimate	Margin of Error
Total	224,547	+/-83
Speaks English Only or speaks English "very well"	216,395	+/-1,472
Speaks English less than "very well"	32,245	

- 2) The frequency with which LEP individuals come in contact with an **People Who Care** services;

People Who Care's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2022** . **People Who Care** averages **one to three persons a year with limited English Proficiency**.

- 3) The nature and importance of the program, activities or services provided by the **People Who Care** to the LEP population.
- 4) The resources available to **People Who Care** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

People Who Care provides a statement in Spanish and will for additional languages specific to the LEP community make up that 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 for written translations

People Who Care 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) Non-Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination 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

1) **People Who Care** provides language assistance services through the below methods:

- Instructions are provided to customer service staff and other **People Who Care** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- Bilingual or multilingual versions of:
 - People Who Care rack card brochures
 - List other: We keep a list of Spanish speaking volunteers to call upon when needed. Contact name and phone number is taken from the LEP caller who is then referred to one of our Spanish speaking volunteers. Coordination subsequently takes place between the volunteer and the program office to assist in the enrollment process, the program meets their needs and our enrollment criteria.

2) **People Who Care** has a process to ensure the competency of interpreters and translation service through the following methods:

People Who Care will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language. **People Who Care** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **People Who Care** will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator. **People Who Care** will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

3) **People Who Care** provides notice to LEP persons about the availability of language assistance through the following methods:

- Statements in outreach documents that language services are available from the agency.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
- Information tables at local events
- Agency websites
- List other: Community civic groups and human service organization presentations

4) **People Who Care** monitors, evaluates and updates the LEP plan through the following process:

People Who Care will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. **People Who Care** will make changes to the language assistance plan based on feedback received. **People Who Care** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **People Who Care** may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. **People Who Care** will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5) **People Who Care** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **People Who Care** will implement processes for training of staff through the following procedures:

People Who Care will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. **People Who Care** will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. **People Who Care** will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. **People Who Care** will implement LEP training to be provided for agency staff. **People Who Care** staff training for LEP to include:

- A summary of the **People Who Care** responsibilities under the DOT LEP Guidance;
- A summary of the **People Who Care** language assistance plan;
- A summary of the number and proportion of LEP persons in the **People Who Care** service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the **People Who Care** cultural sensitivity policies and practices.

Non-Elected Committees Membership Table

Subrecipients who select 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.

People Who Care does not select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

Describe how you monitor your subrecipients. This can be through site visits, submissions of Title VI Plans annually, or training and surveys.

People Who Care 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 subrecipient organization receives any FTA dollars, it must comply with this requirement.

People Who Care has no current or anticipated plans to develop new transit facilities covered by these requirements

Fixed Route Transit Provider Analysis

Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

People Who Care is not a Fixed Route Transit Provider

Board Approval for the Title VI Plan

***(INSERT A COPY OF THE BOARD MEETING MINUTES AFTER
CONDITIONAL CRO APPROVAL. BOARD MINUTES MUST BE FOR THE
YEAR OF THE GRANT APPLICATION CYCLE)**