
Title VI Implementation Plan

Scottsdale Training & Rehabilitation Services (STARS)

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Title VI Policy Statement

The Scottsdale Training & Rehabilitation Services (hereafter referred to as “STARS”) policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), 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, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any STARS sponsored program or activity. There is no distinction between the sources of funding.

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

When STARS distributes Federal-aid funds to another entity/person, STARS will ensure all subrecipients fully comply with STARS Title VI Nondiscrimination Program requirements. The President and CEO has delegated the authority to Christine Cervantes, Human Resources Director, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

David Henderson

David Henderson, President & CEO

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI STARS

STARS 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 STARS.

For more information on STARS' civil rights program, and the procedures to file a complaint, contact Christine Cervantes, 480.994.5704, (TTY dial 711); email ccervantes@starsaz.org or visit our administrative office at 7507 E Osborn Rd. Scottsdale, AZ 85251. For more information, visit www.starsaz.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 Christine Cervantes at 480.994.5704 and an interpreter will be provided.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI STARS

STARS (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 provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la STARS's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Christine Cervantes, 480.994.5704, (TTY dial 711); email ccervantes@starsaz.org o visite nuestra oficina administrativa en 7507 E. Osborn Road Scottsdale, AZ 85251. Para obtener más información, visite www.starsaz.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

The above notice is posted in the following locations: Company bulletin boards (Cholla and Osborn campus) and on all STARS vehicles.

This notice is posted online at www.starsaz.org/about/title-vi-policy/

Title VI Complaint Procedures

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 STARS program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with STARS. This anti-discrimination protection also extends to the activities and programs of STARS 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, STARS must ensure 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 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 STARS. 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:

STARS
c/o Christine Cervantes
Human Resources Director
7507 E. Osborn Road
Scottsdale, AZ 85251
Email: ccervantes@starsaz.org
Phone: 480.994.5704

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

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 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:

STARS, attn: Christine Cervantes

Human Resources Director

7507 E. Osborn Rd.

Scottsdale, AZ 85251

480.994.5704

A copy of this form can be found online at www.starsaz.org/about/title-vi-policy/

**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) _____
Incapacidad (Especifique) _____

¿En qué fecha(s) sucedió la discriminación? _____

Describa la presunta discriminación. Explique qué sucedió y quién cree usted que fue responsable (si necesita más espacio, agregue otra hoja).

Escriba una lista con los nombres de las personas que puedan tener conocimiento de la presunta discriminación y cómo contactarlas.

¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal? Marque todas las que apliquen.

Agencia Federal _____ Corte Estatal _____ Corte Federal _____
Agencia Local _____ Agencia Estatal _____

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre: _____
Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Por favor firme abajo. Puede anexar cualquier material escrito u otra información que usted crea que es relevante sobre su queja.

Firma de la Persona que presenta la queja _____
Fecha

Número de Anexos: _____

Someta la forma y cualquier información adicional a:

STARS, attn: Christine Cervantes
Human Resources Director
7507 E. Osborn Rd.
Scottsdale, AZ 85251
480.994.5704

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?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

STARS has not had any Title VI complaints, investigations, or lawsuits.

STARS
Public Participation
Plan

STARS

STARS provides limited transit services solely to persons who are enrolled in its programs. Individuals are referred to STARS programs through the Arizona Department of Economic Security/Division of Developmental Disabilities.

For individual who have Limited English Proficiency (both current participants and prospective participants), STARS provides the following alternatives to assist them:

- STARS has a diverse staff representing multiple nationalities who can be used for purposes of translation when necessary.
- STARS can, when necessary, provide its literature in alternative languages.
- STARS website utilizes Google translator and can be translated into Spanish.

STARS provides marketing and outreach to the community in the following manner:

- STARS participates in outreach via community partners, disability provider fairs and school transition fairs.
- STARS provides an electronic newsletter to our database on a monthly basis.
- STARS belongs to a variety of members organizations, associations and the Chamber of Commerce.
- STARS is engaged in a variety of social media platforms including FaceBook, Twitter, LinkedIn, Instagram and YouTube.
- STARS has a limited marketing and advertising budget.

STARS participates in the Maricopa Association of Governments (MAG) outreach meeting but does not engage directly in transit planning or decision-making.

Limited English Proficiency Plan

STARS

Limited English Proficiency Plan

STARS

STARS is committed to providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws, including Title VI of the 1964 Civil Rights Act which requires non-discrimination on the basis of nation origin. Equal opportunity includes physical and program access for persons with disabilities and program access for person with Limited English Proficiency (LEP). Program and physical access for persons with disabilities is covered in the Americans with Disabilities Act of 1990 and Rehabilitation Act of 1973 as amended, Section 504.

PROCEDURES

It is the policy of this agency to provide language access services to populations of persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services, and/or benefits.

Any individual eligible for programs/services at STARS who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with our staff has the following rights:

1. A right to qualified interpreter services at no cost to them.
2. A right not to be required to rely on their minor children, other relatives or friends as interpreters.
3. A right to file a grievance about the language access services provided to them.

Information about the discrimination complaint resolution process is available from STARS at your request.

Safe Harbor Provision

STARS 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

STARS does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities and operation centers.

STARS has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since.

Board Approval for the Title VI Program

On January 27, 2016, at a regularly scheduled meeting of the STARS Board of Directors, the STARS Title VI policy was adopted by unanimous vote.

Appendix A: Board Resolution

STARS BOARD MEETING

VISION

To be the leader in creating quality opportunities for life-long empowerment and success. **MISSION**
To improve the lives of individuals with developmental and cognitive disabilities.

VALUES

Passion, Accountability, Integrity, Courage, Excellence

Meeting Agenda

Meeting Room	Cholla Campus, 11130 E. Cholla Drive, Scottsdale, AZ		
Date	Wednesday, January 27, 2015		
Time	8:00am – 9:30am		
Conference Call Info	Toll Free Number: 1-888-394-8197 Participant Pass Code: 435180 Moderator Pass Code: 4351805		
Today's Agenda			
Item	Topics	Responsible Person	Time (approx)
1	Call to Order	Jan Gehler, Chair	8:00
2	Introductions Board Member Moment	Jan Gehler	8:00
3	Board Member Recognition	STARS Staff	8:15
4	Mission Moment: Diana Runfola, sister of Hank Tuft Hank started in the work center in 1978	Gina Griffiths	8:20
5	Consent Agenda: a) Minutes of 11/25/2015 Board Meeting b) Financial Reports: Sep., Oct., Nov. c) Investment Update: December d) Staff Reports e) Events	Jan Gehler	8:30
6	Action Items: • Consent Agenda (motion) • Records Retention & Destruction Policy • Title VI policy • Painting with the Stars	Jan Gehler	8:40
7	Other Business • Annual Campaign • Parada del Sol, Feb. 13 • Participation on Board Committees	Jan Gehler Dave Henderson Will Humble	8:50
8	Adjournment	Jan Gehler	9:30
REMINDER: Next Board Meeting is Wednesday, March 23, 2016, 8:00am @ Cholla Campus			

1 Board Approval for the Title VI Program | **Title VI Implementation Plan**

- Title VI Policy

Title VI of the Civil Rights Act of 1964 asserts that "No person in the United States shall , on 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 program or activity receiving federal financial assistance."

As STARS is a recipient of federal grant dollars via *Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities grant program*, we must adopt and implement a Title VI Plan as part of the grant compliance process.

Jan Gehler asked for a resolution to be passed to adopt Title VI policy. Stephen Hulston made a motion to adopt the policy. Alan Rodbell seconded the motion. The motion carried unanimously.