

Title VI Plan Cover Page

SENIOR CITIZENS OF PATAGONIA 2023

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Para Información en Español: Juan Urias 520-394-2494

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Executive Summary

Senior Citizens of Patagonia serves seniors and people with disabilities in the Patagonia, Sonoita, Elgin and Canelo areas. We provide hot lunches five days a week (M-F) and the number of registered participants are about 190. Each registration is updated yearly. We also take registered seniors and disabled people to medical and dental appointments as well as shopping. Using all volunteer drivers, we drove clients to Tucson, Sierra Vista, Nogales and Green Valley. We help create community by offering a social atmosphere each weekday at noon. We offer our senior center building for holiday festivals, parties, meetings, yoga and tai chi, anniversaries and wedding celebrations.

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

☒ 5310

Type of Funding Requests? (Check all that apply)

- ☒ Operating Funds
- ☒ Other (please explain) Preventive Maintenance

Is your agency a direct recipient of FTA funds?

☒ No

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA SENIOR CITIZENS OF PATAGONIA

SENIOR CITIZENS OF PATAGONIA 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 the **SENIOR CITIZENS OF PATAGONIA**.

For more information on the **SENIOR CITIZENS OF PATAGONIA**'s civil rights program, and the procedures to file a complaint, contact; email user1scp@gmail.com; or visit our administrative office at **PO Box 1121, 100 Quiroga Ln Patagonia, AZ 85624**. For more information, visit seniorcitizensofpatagonia.org.

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 RM: 183 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 **520-394-2494**. *Para información en Español llame: **Charles Kelly 520-394-2494**

The above notice is posted online at seniorcitizensofpatagonia.org

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA SENIOR CITIZENS OF PATAGONIA

SENIOR CITIZENS OF PATAGONIA (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 **SENIOR CITIZENS OF PATAGONIA**, y los procedimientos para presentar una queja, contacte **Charles R. Kelly Secretary/Treasurer**; o visite nuestra oficina administrativa en **PO Box 1121, 100 Quiroga Ln Patagonia, AZ 85624**. Para obtener más información, visite seniorcitizensofpatagonia.org

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 155A 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:

This notice is posted online at seniorcitizensofpatagonia.org and in the Patagonia Senior Center

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 **SENIOR CITIZENS OF PATAGONIA** 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 **SENIOR CITIZENS OF PATAGONIA** 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 **SENIOR CITIZENS OF PATAGONIA** or submitted to the State or Federal authority for guidance.
- (7) **SENIOR CITIZENS OF PATAGONIA** 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) **SENIOR CITIZENS OF PATAGONIA** has 60 business 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 60 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 **SENIOR CITIZENS OF PATAGONIA** 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 RM: 183 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: **seniorcitizensofpatagonia.org**.

If information is needed in another language, contact **520-394-2494**. *Para información en Español llame: **Charles Kelly 520-394-2494**

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?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> Local Agency: _____
<input type="checkbox"/> State Court : _____	
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:

SENIOR CITIZENS OF PATAGONIA

Charles R. Kelly Secretary/Treasurer

PO Box 1121, 100 Quiroga Ln Patagonia, AZ 85624

520-394-2494

user1scp@gmail.com

A copy of this form can be found online at **seniorcitizensofpatagonia.org**

If information is needed in another language, contact **520-394-2494**. *Para información en Español

llame: **Charles Kelly 520-394-2494**

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

☒ **SENIOR CITIZENS OF PATAGONIA** has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2020**.

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

SENIOR CITIZENS OF PATAGONIA 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, **SENIOR CITIZENS OF PATAGONIA** 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.

- ☒ Advertised public announcements through newspapers, fliers, or radio
- ☒ Posted the Nondiscrimination Public Notices to the following locations:
 - ☒ Within transportation vehicles
 - ☒ Lobby of agency
- ☒ Partnered with other local agencies to advertise services provided

SENIOR CITIZENS OF PATAGONIA will make the following community outreach efforts for the **upcoming year**:

- ☒ Advertise public announcements through newspapers, fliers, or radio
- ☒ Post the Nondiscrimination Public Notices to the following locations:
 - ☒ Within transportation vehicles
 - ☒ Lobby of agency
- ☒ Partner with other local agencies to advertise services provided.

PATAGONIA REGIONAL TIMES

The Senior Center has three vans to bring seniors and people with disabilities to medical appointments and shopping. In 2020, volunteer drivers drove 36,242 miles with 504 clients and 1,728 driver hours. Anyone interested in being a volunteer driver are encouraged to contact the Senior Center. Those needing rides can also call the center. Patra Kelly, spokeswoman for the transportation program, suggests scheduling morning and early afternoon appointments so that drivers will not be on the road after dark. Our daily lunch program served 8,641 meals in 2020. The program relies strongly upon our diners' donations to help fund this program, as only half the necessary money come from South East Arizona Governments Organization (SEAGO). The Board of Directors held its annual meeting on January 11th, 2021. Board members are Irene Smith (President), Helen Chester (Vice President), Chuck Kelly (Secretary/Treasurer), Ray Klein, Philp Brister, John Urias, Jon Larsen and Patra Kelly, Directors

Limited English Proficiency Plan

SENIOR CITIZENS OF PATAGONIA 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 **SENIOR CITIZENS OF PATAGONIA** 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 **SENIOR CITIZENS OF PATAGONIA**'s extent of obligation to provide LEP services, the **SENIOR CITIZENS OF PATAGONIA** 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 **SENIOR CITIZENS OF PATAGONIA** service area who may be served or likely to encounter by **SENIOR CITIZENS OF PATAGONIA** program, activities, or services;

<u>Language Spoken At Home by Ability to Speak English For The Population</u>		
<u>5 Years and Over</u>		
<u>2015: ACS 5-Year Estimates Detailed Tables</u>		
	Patagonia Town, AZ	
Label	<u>Estimate</u>	<u>Margin of Error</u>
Total:	697	±164
Speak only English	466	±121
Spanish or Spanish Creole:	216	±114
Speak English "very well"	135	±83
Speak English less than "very well"	81	±53
French (incl. Patois, Cajun):	15	±20
Speak English "very well"	9	±16
Speak English less than "very well"	6	±9
French Creole:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Italian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Portuguese or Portuguese Creole:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
German:	0	±12
Speak English "very well"	0	±12

Speak English less than "very well"	0	±12
Yiddish:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other West Germanic languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Scandinavian languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Greek:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Russian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Polish:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Serbo-Croatian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Slavic languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Armenian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Persian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Gujarati:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hindi:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Urdu:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Indic languages:	0	±12

Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Indo-European languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Chinese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Japanese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Korean:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Mon-Khmer, Cambodian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hmong:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Thai:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Laotian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Vietnamese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Asian languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Tagalog:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Pacific Island languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Navajo:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12

Other Native North American languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hungarian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Arabic:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hebrew:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
African languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other and unspecified languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12

- 2) The frequency with which LEP individuals come in contact with an **SENIOR CITIZENS OF PATAGONIA** services;

SENIOR CITIZENS OF PATAGONIA's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2020** . **SENIOR CITIZENS OF PATAGONIA** averages **5** contacts per **month**.

- 3) The nature and importance of the program, activities or services provided by the **SENIOR CITIZENS OF PATAGONIA** to the LEP population are many and varied.

It is our aim to meet all of our clients' needs, regardless of their language ability. Should there be anyone unable to communicate in English or Spanish, we will make every effort to comply with their requirements, as this is an integral part of our mission statement.

- 4) The resources available to **SENIOR CITIZENS OF PATAGONIA** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

SENIOR CITIZENS OF PATAGONIA 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

SENIOR CITIZENS OF PATAGONIA 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) **SENIOR CITIZENS OF PATAGONIA** provides language assistance services through the below methods:

- ☒ Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
- ☒ Instructions are provided to customer service staff and other **SENIOR CITIZENS OF PATAGONIA** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- ☒ Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
- ☒ Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.

2) **SENIOR CITIZENS OF PATAGONIA** has a process to ensure the competency of interpreters and translation service through the following methods:

SENIOR CITIZENS OF PATAGONIA 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. **SENIOR CITIZENS OF PATAGONIA** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **SENIOR CITIZENS OF PATAGONIA** 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. **SENIOR CITIZENS OF PATAGONIA** 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) **SENIOR CITIZENS OF PATAGONIA** 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
- ☒ Announcements at community meetings

- ☒ Signs and handouts available in vehicles
- ☒ Agency websites

4) **SENIOR CITIZENS OF PATAGONIA** monitors, evaluates and updates the LEP plan through the following process:

SENIOR CITIZENS OF PATAGONIA 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. **SENIOR CITIZENS OF PATAGONIA** will make changes to the language assistance plan based on feedback received. **SENIOR CITIZENS OF PATAGONIA** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **SENIOR CITIZENS OF PATAGONIA** 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. **SENIOR CITIZENS OF PATAGONIA** 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) **SENIOR CITIZENS OF PATAGONIA** 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. **SENIOR CITIZENS OF PATAGONIA** will implement processes for training of staff through the following procedures:

SENIOR CITIZENS OF PATAGONIA 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. **SENIOR CITIZENS OF PATAGONIA** 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. **SENIOR CITIZENS OF PATAGONIA** 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. **SENIOR CITIZENS OF PATAGONIA** will implement LEP training to be provided for agency staff. **SENIOR CITIZENS OF PATAGONIA** staff training for LEP to include:

- A summary of the **SENIOR CITIZENS OF PATAGONIA** responsibilities under the DOT LEP Guidance;
- A summary of the **SENIOR CITIZENS OF PATAGONIA** language assistance plan;
- A summary of the number and proportion of LEP persons in the **SENIOR CITIZENS OF PATAGONIA** 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 **SENIOR CITIZENS OF PATAGONIA** cultural sensitivity policies and practices.

LIMITED ENGLISH PROFICIENCY PLAN

It is not frequent that Limited English Proficiency individuals come in contact with Senior Citizens of Patagonia's services. Since our population is not greatly increasing, the number of

LEP citizens is not expected to grow very much. An account in both English and Spanish, detailing our available services, is posted on our website: seniorcitizensofpatagonia.org in an effort to communicate to potential LEP clients and others. This is our primary method of reaching our population, including those who communicate only in Spanish. Many of our lunch-goers and van drivers are bilingual, so language barriers are seldom a problem. Our budget includes funds earmarked for distribution of bilingual communications to our population. If anyone knows of an LEP person needing our services and requiring assistance, please inform one of our Board of Directors.

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.

☒ **SENIOR CITIZENS OF PATAGONIA** 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.

☒ **SENIOR CITIZENS OF PATAGONIA** 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.

☒ **SENIOR CITIZENS OF PATAGONIA** 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: [INSTRUCTIONS] (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

☒ **SENIOR CITIZENS OF PATAGONIA** is not a Fixed Route Transit Provider

Board Approval for the Title VI Plan

The Board of Directors of Senior Citizens of Patagonia, Inc. agrees to all the provisions of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA), operating its programs and services without regard to race, color, national origin or disability. It approves and agrees with the Title VI Civil Rights document as submitted on the ADOT 5310 application cycle for the years 2023-2024, and as listed on our website.