

Title VI Plan Cover Page

ASSIST! TO INDEPENDENCE 2023

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Para Información en Español: Eileen M. Tohonnie, Executive Director

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Executive Summary

Mission Statement: Empowering American Indians with disabilities to live in Harmony.

Assist! To Independence is an American Indian owned community based non-profit agency. The organization was established by and for Native Americans with disabilities to help fill some gaps in service delivery. The agency serves as a consumer driven program to facilitate general awareness of disability related issues that are culturally appropriate and relevant for Native Americans with disabilities. Program staff work to provide the tools necessary for individuals to make informed choice decisions to maintain a maximum level of independent living.

Assist! To Independence was established in 1997 as a non-profit 501c3 organization by a group of tribal members with disabilities to provide consumer-driven and culturally appropriate independent living services to Native Americans with disabilities who reside on the Navajo Nation in Arizona and later eligible consumers who reside on the Hopi Nation and the San Juan Southern Paiute reservation in Arizona.

Assist! To Independence is the only Independent Living Center located on tribal lands in the United States providing independent living services and other much needed services to Native Americans with disabilities who reside in remote and rural communities. The population in the Assist! Service areas is approximately 175,000. Of this population, over 70% live more than 50 miles from any medical facility and over 33% do not have transportation. Over 60% of the population do not have running water, electricity or telephone, and many are elders who do not speak or write English. Approximately 30% of the population are people with disabilities.

Currently our transportation program consists of 1 transportation coordinator and 3 part time drivers. Our office hours are Monday to Friday, 8am to 5 pm. The Transportation program hours vary depending on the needs of the clients. Assist! Has been a recipient of 5310 grant since 2017. Our fleet consist of 5 vehicles: 2022 Chrysler

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 ASSIST! TO INDEPENDENCE

ASSIST! TO INDEPENDENCE 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 **ASSIST! TO INDEPENDENCE**.

For more information on the **ASSIST! TO INDEPENDENCE**'s civil rights program, and the procedures to file a complaint, contact **Eileen M. Tohonnie, Executive Director, 928 283 6261, (TTY 928 283 6261); email etohonnie@assistti.org;** or visit our administrative office at **4133 E Cedar Avenue, Tuba City, Arizona**. For more information, visit **Assistti.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 **928 283 6261**. *Para información en Español llame: **Eileen M. Tohonnie, Executive Director**

Non Discrimination Notice to the Public - Multilingual

"Díí ałaań́ diné' é bich' i' hané álı́ń́ı́giı́ ahééł
t' éégo saád béé yátı́' dóo bił íı́shjaá' alı́ń́ı́h."

- Dinek' eji

Díí Assist to Independence ei Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, dóo the Americans with Disabilities Act of 1990 dáolyégo yı́ł nidáálnı́ı́sh

Díí Assist to Independence ei bilá áshdlá' i' ałaań́ diné' é bich' i' áanı́dáhastı́' iı́gi taa altsó naaltsóos bik' ééstı́' iı́gi yık' i' dádeés' iı́ń dóo hadaa yiteégo sistłaa' ghaágo éi altsé yanáhasaań́ dóo saád bikı́jı́ niltsı́' goó yıká' iı́jaa. Áadóo ná' iidikiid binına dóo yá' at' ééhgó nihı́ch' i' há' oodziı́go dóodágo éi dóo nihıká' á' ayéégo t' óo naaltsóos béé hádı́dóólı́ı́ł, Assist to Independence ei nihıkáá ádóojáá.

Díí bibée hasanı́ bik' éést' iı́hiı́gi bił ná' áanı́ı́sh dóo saád holóqógo béé hádı́ı́lı́ı́. Ákwı́tı́ı́goó éi Eileen Tohonne, Executive Director bi béesh hané bich' i' hóojiılını́h (928) 283-6261 dóodágo éi béesh ná' áłkááhi béé bich' i' ajiı́lı́ı́ń etohonne@assistti.org dóodágo ei 4133 E. Cedar Ave, Tonáneésdizı́dı́ bił yá' ájiı́ghá.

Ła' ná' iidı́ı́kid náhóodlóqógo éi béesh ná' áłkááhi biyı́ı́jı́
www.assistti.org háázh di' iı́' áldó.

Táadı́ saád hóloqógo éi Arizona Department of Transportation (ADOT) Civil Rights Office bił házhdı́ı́lı́ı́ń. ATTN: Title VI Program Coordinator, 206 S. 17th Ave. MD 155A RM: 183 Phoenix, AZ, 85007 or Federal Transit Administration (FTA). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington, DC 20590

Áadóo lách hót' éégo saád béé yátı́' béé ná' iidikiı́dgoó éi Eileen Tohonne bich' i' dáhołné, (928) 283-6261.

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 **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE** or submitted to the State or Federal authority for guidance.

- (7) **ASSIST! TO INDEPENDENCE** 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) **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE** 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: **Assistti.org**.

If information is needed in another language, contact 928 283 6261. *Para información en Español llame: Eileen M. Tohonnie, Executive Director

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
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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:

ASSIST! TO INDEPENDENCE
Eileen M. Tohonnie, Executive Director
4133 E Cedar Avenue, Tuba City, Arizona
928 283 6261
etohonnie@assistti.org

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

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

ASSIST! TO INDEPENDENCE has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2023-2024**.

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

ASSIST! TO INDEPENDENCE 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, **ASSIST! TO INDEPENDENCE** 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.

- Posted the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - 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 (Please provide a web link here)
- Hosted an information booth at a community event (Please insert the date of the event below)

ASSIST! TO INDEPENDENCE 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:
 - Within transportation vehicles
 - Lobby of agency
- Partner with other local agencies to advertise services provided.
- 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
- Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.

Public Participation Evidence



ATI Transportation Prgm Customer Satisfaction Surveys Completed.pdf

Limited English Proficiency Plan

ASSIST! TO INDEPENDENCE 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 **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE**'s extent of obligation to provide LEP services, the **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE** service area who may be served or likely to encounter by **ASSIST! TO INDEPENDENCE** program, activities, or services;

[C16001: LANGUAGE SPOKEN AT HOME FOR ... - Census Bureau Maps](#)

- 2) The frequency with which LEP individuals come in contact with an **ASSIST! TO INDEPENDENCE** services;

ASSIST! TO INDEPENDENCE's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2023-2024** . **ASSIST! TO INDEPENDENCE** averages **10** contacts per **day**.

- 3) The nature and importance of the program, activities or services provided by the **ASSIST! TO INDEPENDENCE** to the LEP population.

It is important for ATI staff and drivers to assist native speaking riders and participants in their own native languages so riders can voice their needs and concerns so that drivers/transportation staff can fully serve them with all their needs so they are satisfied with services and if they are not, then the problems will be fixed quickly to participants/rider's satisfaction. Also when filling out Satisfaction Surveys or conducting Needs Surveys, riders can assist riders with translating the materials to riders and helping them fill out surveys. Currently three of four drivers are native language speakers so they can converse with the riders in the native language. ATI is currently working on a Navajo translation of the Civil Rights poster as a majority of the riders are Navajo speaking and also most San Juan Southern Paiute tribal members speak Navajo too. Most Hopis know how to speak English and it's not often that we see a Hopi language speaker only.

- 4) The resources available to **ASSIST! TO INDEPENDENCE** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

The only cost is paying someone to translate the Non Discrimination Notice to Public and that may approximately \$200-300 due to Navajo translators being in demand. Otherwise since majority of drivers speak Navajo language fluently, ATI does not need to pay for extra translators.

ASSIST! TO INDEPENDENCE 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

ASSIST! TO INDEPENDENCE 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

- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

1) **ASSIST! TO INDEPENDENCE** provides language assistance services through the below methods:

- Instructions are provided to customer service staff and other **ASSIST! TO INDEPENDENCE** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
- Use of “I Speak” cards

2) **ASSIST! TO INDEPENDENCE** has a process to ensure the competency of interpreters and translation service through the following methods:

ASSIST! TO INDEPENDENCE 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. **ASSIST! TO INDEPENDENCE** will train the interpreter or translator in specialized terms and concepts associated with the agency’s policies and activities. **ASSIST! TO INDEPENDENCE** 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. **ASSIST! TO INDEPENDENCE** 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) **ASSIST! TO INDEPENDENCE** provides notice to LEP persons about the availability of language assistance through the following methods:

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available from the agency.
- Announcements at community meetings
- Information tables at local events
- Agency websites

4) **ASSIST! TO INDEPENDENCE** monitors, evaluates and updates the LEP plan through the following process:

ASSIST! TO INDEPENDENCE 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. **ASSIST! TO INDEPENDENCE** will make changes to the language assistance plan based on feedback received. **ASSIST! TO INDEPENDENCE** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **ASSIST! TO INDEPENDENCE** 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. **ASSIST! TO INDEPENDENCE** 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.

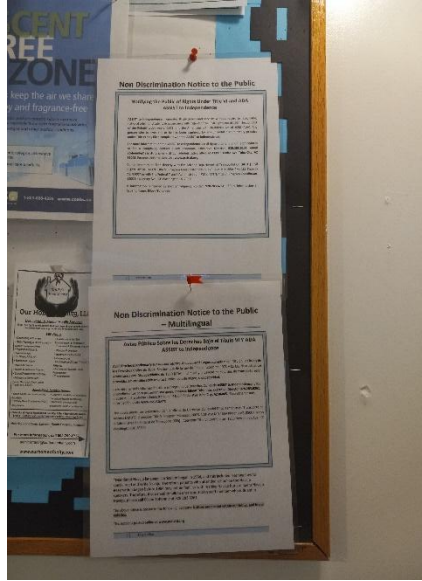
5) **ASSIST! TO INDEPENDENCE** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **ASSIST! TO INDEPENDENCE**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

ASSIST! TO INDEPENDENCE 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. **ASSIST! TO INDEPENDENCE** 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. **ASSIST! TO INDEPENDENCE** 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. **ASSIST! TO INDEPENDENCE** will implement LEP training to be provided for agency staff. **ASSIST! TO INDEPENDENCE** staff training for LEP to include:

- A summary of the **ASSIST! TO INDEPENDENCE** responsibilities under the DOT LEP Guidance;
- A summary of the **ASSIST! TO INDEPENDENCE** language assistance plan;
- A summary of the number and proportion of LEP persons in the **ASSIST! TO INDEPENDENCE** 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 **ASSIST! TO INDEPENDENCE** cultural sensitivity policies and practices.

***PROVIDE SAMPLE DOCUMENTS YOUR AGENCY PROVIDES FOR LEP
INDIVIDUALS**

Flyers are put into all ATI vehicles and also posted in 2 areas in the office for the public and riders.



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.

ASSIST! TO INDEPENDENCE 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.

ASSIST! TO INDEPENDENCE does not monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

ASSIST! TO INDEPENDENCE 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)

ASSIST! TO INDEPENDENCE 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)**