
Title VI Implementation Plan



ASSIST! to Independence Center for Independent Living

“Empowering American Indians with disabilities to live in Harmony.”

2019-2020

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Address: 4133 E Cedar Ave Tuba City, AZ 86045

Web Address: www.assistti.org

Para Información en Español: Eileen Tohonnie

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Executive Summary

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

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, New Mexico, and Utah, and later included eligible consumers who reside on the Hopi Reservation 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 total 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 individuals with disabilities.

Currently our transportation program consists of 1 transportation supervisor and 2 part-time drivers. Our office hours are Monday to Friday 8 am to 5 pm, transportation program hours vary depending on the needs of the clients. As a recipient of ADOT 5310 grant since 2017. Our fleet consist of 5 vehicles, 2015 Jeep Patriot, 2017 Hyundai Tucson, 2018 Buick Encore, 2018 Dodge Braun Entervan, 2007 Ford E350 Eldor Bus.

Our drivers maintain daily pre/post vehicle inspections, daily trip reports, and maintain vehicle maintenance schedules. They check all fluid levels, tires, wheelchair ramp, and tie downs. Our drivers are trained in CPR and First Aid training, PASS training and all other training the Contracting and Procurement officer deems necessary to ensure a safe and quality driven program.

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

Is your agency a direct recipient of FTA funds?

- Yes
- 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 Tohonnie, Executive Director, 928.283.6261; email etohonnie@assistti.org**; or visit our administrative office at **4133 E Cedar Ave Tuba City, AZ 86045**. For more information, visit **www.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 Tohonnie**

Non Discrimination Notice to the Public – Multilingual

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA ASSIST to Independence

ASSIST to Independence (*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 **ASSIST to Independence**, y los procedimientos para presentar una queja, contacte **Eileen Tohonnie, Executive Director 928.283.6261**; o visite nuestra oficina administrativa en **4133 E Cedar Ave Tuba City, AZ 86045**. Para obtener más información, visite **www.assistti.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

*Mandated Navajo language curriculum began in 1984, and this included learning how to speak, read and write Navajo. Therefore, patients who attended school on the Navajo Reservation began before 1984 may not be familiar with reading Navajo but are fluent Navajo speakers. Therefore, if you need to talk to a transportation staff member who is fluent in Navajo, please call Eileen Tohonnie at 928.283.6261

The above notice is posted in the following locations: **Notices are posted within our lobby, and in our vehicles.**

This notice is posted online at **www.assistti.org**

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 30 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 30 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 30 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: www.assistti.org.

If information is needed in another language, contact **928.283.6261**. *Para información en Español llame: **Eileen Tohonn**

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:

ASSIST to Independence

Eileen Tohonnie, Executive Director

4133 E Cedar Ave Tuba City, AZ 86045

928.283.6261

etohonnie@assistti.org

A copy of this form can be found online at **www.assistti.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 **2018**.

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 ***Center for Independent Living***

“Empowering American Indians with disabilities to live in Harmony.”

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

ASSIST to Independence will make the following community outreach efforts for the **upcoming year**:

- Expand the distribution of agency brochures
- Post the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Lobby of agency
- Partner with other local agencies to advertise services provided.
- 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.

The collage consists of three documents:

- Top Left Brochure:** Titled "ASSIST to Independence Center for Independent Living (CIL)", it features the website "www.assisti.org" and a quote: "Empowering American Indians with disabilities to live in Harmony". Contact information includes phone number 928.283.6261.
- Top Right Survey Form:** Titled "TRANSPORTATION SATISFACTION SURVEY", it includes contact information for ASSIST to Independence (PO Box 4133, Tuba City, AZ 86045, www.assisti.org) and a list of seven questions regarding transportation services. Questions cover timeliness, driver professionalism, referral likelihood, satisfaction, and language preference.
- Bottom Brochure:** Describes ASSIST to Independence as an Indian-owned, non-profit community-based agency established by and for Native Americans. It details the agency's mission to provide services to facilitate general awareness of disability-related issues and to provide tools for individuals to make informed choices to maintain a maximum level of independent living.

Limited English Proficiency Plan

Assist to Independence's transportation drivers are fluent in Navajo and capable of assisting patients with limited English speaking skills. Also, our transportation program welcomes a patient escort to help with physical and communication needs.

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 and/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;

U.S. Census Bureau
FactFinder

1816001 | LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Universe: Population 5 years and over
2011-2015 American Community Survey 5-Year Estimates

Note: This is a modified view of the original table. Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Tuba City GDP, Arizona		ZCTAs 86045	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	8,916	+/-681	11,426	+/-670
Speak only English	4,472	+/-553	5,467	+/-588
Spanish or Spanish Creole:	1	+/-2	4	+/-5
Speak English "very well"	1	+/-2	4	+/-5
Speak English less than "very well"	0	+/-17	0	+/-19
French (incl. Patois, Cajun):	0	+/-17	0	+/-19
French Creole:	0	+/-17	0	+/-19
Italian:	0	+/-17	0	+/-19
Portuguese or Portuguese Creole:	0	+/-17	0	+/-19
German:	0	+/-17	0	+/-19
Yiddish:	0	+/-17	0	+/-19
Other West Germanic languages:	0	+/-17	0	+/-19
Scandinavian languages:	0	+/-17	0	+/-19
Greek:	0	+/-17	0	+/-19
Russian:	0	+/-17	0	+/-19
Polish:	0	+/-17	0	+/-19
Serbo-Croatian:	0	+/-17	0	+/-19
Other Slavic languages:	0	+/-17	0	+/-19
Armenian:	0	+/-17	0	+/-19
Persian:	0	+/-17	0	+/-19
Gujarati:	0	+/-17	0	+/-19
Hindi:	0	+/-17	0	+/-19
Urdu:	0	+/-17	0	+/-19
Other Indic languages:	0	+/-17	0	+/-19
Other Indo-European languages:	0	+/-17	0	+/-19
Chinese:	6	+/-10	15	+/-19
Speak English "very well"	6	+/-10	9	+/-15
Speak English less than "very well"	0	+/-10	6	+/-10
Japanese:	0	+/-17	0	+/-19
Korean:	0	+/-17	0	+/-19
Mon-Khmer, Cambodian:	0	+/-17	0	+/-19

	Tuba City GDP, Arizona		ZCTAs 86045	
	Estimate	Margin of Error	Estimate	Margin of Error
Hmong:	0	+/-17	0	+/-19
Thai:	74	+/-116	74	+/-116
Speak English "very well"	37	+/-60	37	+/-60
Speak English less than "very well"	37	+/-58	37	+/-58
Laotian:	12	+/-19	12	+/-19
Speak English "very well"	0	+/-17	0	+/-19
Speak English less than "very well"	0	+/-17	0	+/-19
Vietnamese:	0	+/-17	0	+/-19
Other Asian languages:	0	+/-17	0	+/-19
Tagalog:	66	+/-72	66	+/-72
Speak English "very well"	31	+/-39	31	+/-39
Speak English less than "very well"	35	+/-52	35	+/-52
Other Pacific Island languages:	0	+/-17	0	+/-19
Navajo:	3,879	+/-474	4,784	+/-490
Speak English "very well"	2,556	+/-359	3,064	+/-383
Speak English less than "very well"	1,321	+/-265	1,720	+/-285
Other Native North American languages:	406	+/-285	1,004	+/-312
Speak English "very well"	257	+/-139	733	+/-183
Speak English less than "very well"	149	+/-181	271	+/-178
Hungarian:	0	+/-17	0	+/-19
Arabic:	0	+/-17	0	+/-19
Hebrew:	0	+/-17	0	+/-19
African languages:	0	+/-17	0	+/-19
Other and unspecified languages:	0	+/-17	0	+/-19

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see Language User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas, in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Explanation of Symbols:

1. An "N" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An "I" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An "F" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An "U" following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "L" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "C" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An "X" means that the estimate is not applicable or not available.

- 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 **2018** . **ASSIST to Independence** averages **5**contacts per **WEEK**.

- 3) The nature and importance of the program, activities or services provided by the **ASSIST to Independence** to the LEP population; and is used to deliver effective and efficient transit services to persons with limited English proficiency.
- 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.

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) Route Changes
- (5) 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.
- Information tables at local events
- Signs and handouts available in vehicles and at stations
- 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.



ASSIST to Independence
Center for Independent Living (CIL)
www.assisti.org



"Empowering American Indians with disabilities to live in Harmony"
Phone: 928-283-6261

We are located on the western edge of the Navajo Nation in Tuba City, Arizona.

Our program provides services primarily to the Navajo, Hopi, and Southern Paiute Nations; however, anyone needing information or assistance in the northern part of the state is welcome to request services

ASSIST to Independence

Limited English Proficiency: Navajo Interpretor available. (Our driver speak Navajo)

4133 E Cedar Ave
Tuba City, AZ 86045
Phone: 928-283-6261
Fax: 928-283-6284
contact@assisti.org
www.assisti.org

ASSIST to Independence Vision

Statement:
To promote culturally appropriate services to enhance the quality of independent living among American Indians with disabilities.

WHO IS ELIGIBLE FOR SERVICES

Since ASSIST to INDEPENDENCE receives funding from different sources, the eligibility criteria will vary depending on the funding source. The designated service areas for ASSIST to INDEPENDENCE include the Navajo Reservation, Hopi Reservation, and the San Juan Southern Paiute Reservation. All applicants must meet the following eligibility criteria:

- 1) Must have a physical, mental, or cognitive disability that substantially limits one or more of the individual's major life activity
- 2) Must have a medical record of such an impairment; or
- 3) Is regarded as having such an impairment.

**Individuals with significant disability means an individual who is unable to function independently within their family or community if limited. That is, services provided will improve their ability to function independently in their home and community or to continue with employment.*

WHAT IS INDEPENDENT LIVING?

Independent Living Services means having the same choices and control in your daily life, that non-disabled friends, family, neighbors, and community members have. This includes taking risks, taking responsibilities and having the same right to succeed or fail.

ASSIST to Independence provides the following services to consumers:

Information & Referral – This provides an individual access to what services are available, and then explains where and how to get the appropriate services.

Independent Living Training – Training is tailored to personal need, and may be done on an individual basis or in a group. Examples: personal care, coping skills, equipment, maintenance and social skills.

Advocacy – An advocate is simply someone who knows the process for consumers and will help you learn and speak on your behalf.

Peer Mentoring – A mentor is an individual who has experience and a certain level of independence and community integration and who is willing to share their experiences of living with a disability.

Transition –

- 1) Nursing home to community living
- 2) Youth – high school to higher education or workforce

Additional Services Are Provided:

Traditional Healing Services – Financial assistance for native healing ceremonies that are related to independent living need and goals.

Durable Medical Equipment – Our center houses a large selection of durable medical equipment (DME), such as wheelchairs, walkers, transfer boards, bedside commodes and wheelchair cushions.

Transportation – ASSIST to Independence provides both ambulatory and non-ambulatory transportation to consumers who qualify and need non-emergency transportation to medical appointments. Non-medical transports may also be provided, but are considered depending on probability of drivers.

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

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.

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: [INSTRUCTIONS] (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

Board Approval for the Title VI Program

Adopted by a resolution of the Board of Directors on July 1, 2019. Below are the Board Minutes for the adopted resolution that adopted the Title VI Implementation Plan.

BOARD MINUTES for July 1, 2019

ATI Board of Directors supports Assist to Independence staff in implementing Title VI Program Policies. Assist to Independence operates under Title VII and some things do not apply to us.

Harrison Bia motion to approve Title VI Implementation Plan, Peterson Yazzie 2nds, and motion passes unanimously 5 - 0 - 0.

I, the undersigned have the authority to change organizational doctrine and have read and understood the updates to the Non-Discrimination Policy. I will ensure these updates to go into effect on the date this document is signed. Subsequently revisions will require that this document be resigned and resubmitted to ADOT.


Ela M. Yazzie-King, Board President