

*Crossroads Mission
Title VI Implementation
Plan*

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Executive Summary

Crossroads Mission receives federal financial assistance exclusively through the Arizona Department of Transportation (ADOT) Section 5310 Program. These funds support capital, maintenance, and operations for transportation services provided to seniors and individuals with disabilities in the Yuma region.

As a recipient of 5310 funding, Crossroads Mission is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any of its programs or activities on the basis of race, color, national origin, or disability. This commitment is 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).

This Title VI Implementation Plan outlines the policies, procedures, and practices that guide Crossroads Mission's compliance with federal civil rights requirements. It includes public notification of rights, complaint procedures, a complaint form, and strategies for engaging individuals with limited English proficiency. The plan also identifies the Title VI and ADA Coordinator responsible for overseeing compliance and responding to public concerns.

Crossroads Mission remains dedicated to providing equitable and accessible transportation services to all eligible individuals, and to maintaining transparency and accountability in its operations.

Title VI Policy Statement

The Crossroads Mission policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any Crossroads Mission sponsored program or activity. There is no distinction between the sources of funding.

Crossroads Mission also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, Crossroads Mission will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Crossroads Mission distributes Federal-aid funds to another entity/person, Crossroads Mission will ensure all sub recipients fully comply with Crossroads Mission Title VI Nondiscrimination Program requirements. The Executive Director has delegated the authority to Crossroads Mission, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.


Myra Garlit, Chief Executive Officer

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Crossroads Mission

The Crossroads Mission 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 Crossroads Mission.

For more information on the Crossroads Mission's civil rights program, and the procedures to file a complaint, contact Angel Salas, ADA & Title VI Coordinator, 928-328-8614, (TTY 928-329-9162); email awise@crossroadsmission.org; or visit Angel's office in the Men's Shelter building #100 at 944 S Arizona Avenue, Yuma, AZ. For more information, visit www.crossroadsmission.org.

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **ADOT**: ATTN: Title VI Program Manager 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 928-328-8013. Para informaci6n en Espanol llame: Azucena Solorzano, 928-328-8013.

Title VI Notice to the Public -Spanish

Aviso al Publico Sobre los Derechos Bajo el Titulo VI Crossroads Mission

Crossroads Mission opera sus programas y servicios sin distinción de raza, color, origen nacional o discapacidad, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964, la Sección 504 de la Ley de Rehabilitación de 1973 y la Ley de Estadounidenses con Discapacidades de 1990 (ADA). Cualquier persona que crea haber sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante Crossroads Mission.

Para obtener más información sobre el programa de derechos civiles de Crossroads Mission y los procedimientos para presentar una queja, comuníquese con Angel Salas, Coordinador de ADA y Título VI, al 928-328-8614, (TTY 928-329-9162); por correo electrónico a awise@crossroadsmission.org; o visite la oficina de Angel en el edificio del Refugio para Hombres #100 en 944 S Arizona Avenue, Yuma, AZ. Para más información, visite www.crossroadsmission.org.

Una persona también puede presentar una queja directamente ante el Departamento de Transporte de Arizona (ADOT) o la Administración Federal de Tránsito (FTA) enviando la queja a las siguientes oficinas de Derechos Civiles: ADOT: ATTN: Title VI Program Manager, 206 S. 17TH Ave MD 155A RM: 183, Phoenix, AZ 85007
FTA: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma, comuníquese al 928-328-8013. Para información en español, llame a Azucena Solorzano al 928-328-8013.

The above notice is posted in the following locations: 944 S Arizona Avenue, Yuma, AZ.

This notice is posted online at www.crossroadsmission.org

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 Crossroads Mission 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 Title VI 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 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, Crossroads Mission 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 Crossroads Mission or submitted to the State or Federal authority for guidance.
- (7) Crossroads Mission will notify the ADOT Civil Rights Office of ALL Title VI complaints within 72 hours via telephone at 602-712-8946; email at civilrightsoffice@azdot.gov.

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- (8) Crossroads Mission has 15 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 Title VI 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. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with Crossroad Mission decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT:** ATTN Title VI Program Manager 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
- (11) A copy of these procedures can be found online at: www.crossroadsmission.org.

Crossroads Mission will investigate Title VI complaints against its sub recipients; all other Title VI complaints filed against Crossroads Mission will be investigated by the Arizona Department of Transportation.

- (1) For Title VI complaints filed against Crossroads Mission: Within 5 calendar days of receipt, Crossroads Mission will notify ADOT of the Title VI complaint being filed. The complaint will then be logged identifying its basis of discrimination, the status, and the next steps. ADOT then will assume jurisdiction and follow ADOT's complaint procedures for investigating the complaint.
- (2) For Title VI complaints filed against Crossroads Mission's sub recipients (ie, consultants, vendors, and contractors) Crossroads Mission will assume jurisdiction and will investigate and adjudicate the case.

- (3) The Crossroads Mission has 15 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.
- (4) 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 Title VI 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. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.
- (5) A complainant dissatisfied with Crossroads Mission decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT**: ATTN Title VI Program Manager 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
- (6) A copy of these procedures can be found online at: www.crossroadsmission.org.
(Una copia de estos procedimientos puede encontrarse en línea en www.crossroadsmission.org)

Discrimination ADA / Title VI Complaint Form

| | | |
|---|--------------------------------------|--|
| Section I: | | |
| This form may be used to file a complaint of discrimination based on race, color, national origin, or disability under Title VI, the ADA, and Section 504 | | |
| 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 IV: | | |
| Have you previously filed a Title VI complaint with this agency? | | <input type="checkbox"/> Yes <input type="checkbox"/> No |

| | |
|---|--|
| If yes, please provide any reference information regarding your previous complaint. | |
| | |
| Section V: | |
| Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? | |
| <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:

Angel Salas, Title VI Coordinator
 Crossroads Mission
 944 S Arizona Avenue
 Yuma, AZ 85364
 928-328-8614

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A copy of this form can be found online at www.crossroadsmission.org

Discrimination ADA / Title VI Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

| Description/Name | Date (Month, Day, Year) | Summary (include basis of complaint: race, color, national origin or disability) | Status | Action(s) Taken (Final findings?) |
|-----------------------|-------------------------|---|--------|--------------------------------------|
| Investigations | | | | |
| 1) | | | | |
| 2) | | | | |
| Lawsuits | | | | |
| 1) | | | | |
| 2) | | | | |
| Complaints | | | | |
| 1) | | | | |
| 2) | | | | |

X Crossroads Mission has not had any ADA & Title VI complaints, investigations, or lawsuits in 2025.

Public Participation Plan

Crossroads Mission Public Participation Plan

Crossroads Mission 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, Crossroads Mission made the following community outreach efforts:

In the upcoming year Crossroads Mission will make the following community outreach efforts:

Public Meetings:

- (1) Crossroads Mission provides written materials for all residents regarding community opportunities for transportation, housing, and health issues.
- (2) Crossroads Mission has an Outreach program that contacts unsheltered homeless in the community with brochures and information for help in transportation, housing, and health issues.
- (3) Crossroads Mission partners with local agencies to advertise services provided.

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Crossroads Mission submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is public notice, which includes a 30-day public comment period.

Limited English Proficiency Plan

Crossroads Mission

Limited English Proficiency Plan

Crossroads Mission 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 Crossroads Mission 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 Mission 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 Crossroads Mission service area who may be served or likely to encounter by Crossroads Mission program, activities, or services is 50%.
- 2) The frequency with which LEP individuals come in contact with an Crossroads Mission services is daily.
- 3) The nature and importance of the program, activities or services provided by the Crossroads Mission to the LEP population is extremely important as the Hispanic population in Yuma community is around 60%.
- 4) The resources available to Crossroads Mission and overall costs to provide LEP assistance is approximately the hourly staff wage for staff assistance or contracted services with JR Languages at \$2 per minute.

Language Spoken at Home by Ability to Speak English data:

Yuma City Arizona

| Label | Estimate | Margin of Error |
|---|----------|-----------------|
| Speak English less than "very well" | 7 | 12 |
| Other Indo-European languages: | 359 | 130 |
| Speak English "very well" | 318 | 132 |
| Speak English less than "very well" | 41 | 41 |
| Korean: | 59 | 55 |
| Speak English "very well" | 22 | 24 |
| Speak English less than "very well" | 37 | 35 |
| Chinese (incl. Mandarin, Cantonese): | 31 | 34 |
| Speak English "very well" | 14 | 19 |
| Speak English less than "very well" | 17 | 23 |
| Vietnamese: | 156 | 151 |
| Speak English "very well" | 65 | 88 |
| Speak English less than "very well" | 91 | 78 |
| Tagalog (incl. Filipino): | 638 | 211 |
| Speak English "very well" | 497 | 170 |
| Speak English less than "very well" | 141 | 67 |
| Other Asian and Pacific Island languages: | 161 | 84 |
| Speak English "very well" | 113 | 75 |
| Speak English less than "very well" | 48 | 43 |
| Arabic: | 82 | 62 |
| Speak English "very well" | 82 | 62 |
| Speak English less than "very well" | 0 | 31 |
| Other and unspecified languages: | 305 | 172 |
| Speak English "very well" | 248 | 137 |
| Speak English less than "very well" | 57 | 79 |

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Crossroads Mission's staff consists of approximately 50% Hispanic population with many of these testing as Spanish translators and interpreters. All residents and visitors needing an assistance in Limited English Proficiency can request and receive assistance at all hours. If an interpreter is not available a list of interpreters who can be called is kept at each facility. All written materials at Crossroads Mission is available in Spanish.

Safe Harbor Provision

Crossroads Mission complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

Non-elected Committees Membership Table

A sub recipient who selects 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. Sub recipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

| Body | Caucasian | Latino | African American | Asian American | Native American |
|---|------------------|---------------|-------------------------|-----------------------|------------------------|
| Population | 34.1% | 58.8% | 2.8% | 1.6% | .8% |
| Board of Directors | 82% | 9% | 9% | 0% | 0% |
| Crossroads Mission Administrative Board | 82% | 9% | 9% | 0% | 0% |
| Crossroads Mission Fundraising Committee | 75% | 25% | 0% | 0% | 0% |

Crossroads Mission's staff is provided a list of written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services, including staff members who are Spanish speaking proficient and certified as interpreters.

Instructions are provided to customer service staff and other Crossroads Mission 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, case managers, and others who regularly interact with the public on how to respond to an LEP customer.

Crossroads Mission seeks to encourage participation of local minority residents to participate on its board and apply for employment.

Monitoring for Sub recipient Title VI Compliance

X Crossroads Mission does NOT have sub recipients.

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 sub recipient organization receives any FTA dollars, it must comply with this requirement.

A. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Additionally, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

This document is an analysis of Crossroads Mission's planned New Men's Shelter.

B. Background

Crossroads Mission's Men's Shelter is located at 944 South Arizona Avenue. A new facility is being planned one block away in the same industrial site. Crossroads Mission does not discriminate on the basis of race, color, or national origin. The new facility site location has the same availability and ease of use for all persons now residing at the current Men's Shelter.

C. Analysis

For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating an agency in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or origin.

The location for the New Men's Shelter is on the same street and block location as the current Men's Shelter. Crossroads Men's Shelter does not discriminate on the basis of race, color, or national origin. The New Men's Shelter has the same availability and ease of use for all persons now residing at the current Men's Shelter or will reside at the New Men's Shelter.