Title VI Plan Cover Page

Title VI Implementation Plan The Opportunity Tree 2024



Title VI Contact: Neal Hallihan- Chief Operating Officer Title VI Contact Phone: 602-956-0400 Ext. 206 Title VI Contact Email: nhallihan@theopportunitytree.org TTY Number (If applicable): 1-800-842-2088 Alternate Language Phone: Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org Address: 3146 E. Windsor Ave., Phoenix, AZ 85008 Web Address: www.theopportunitytree.org Para Información en Español: Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org

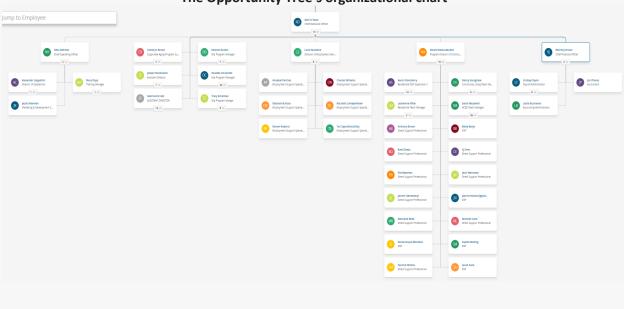
Title VI Plan Table of Contents

Title VI Plan Cover Page	1
Title VI Plan Table of Contents	2
Executive Summary	3
Non Discrimination Notice to the Public	5
Non Discrimination Notice to the Public - Spanish	6
Non Discrimination ADA/Title VI Complaint Procedures	7
Discrimination ADA/Title VI Complaint Form	9
Titulo VI Forma para poner una Queja	11
Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits	13
Public Participation Plan	14
	17
Limited English Proficiency Plan	20
Non-elected Committees Membership Table	
Monitoring for Subrecipient Title VI Compliance	29
Title VI Equity Analysis	
Fixed Route Transit Provider Analysis	
Board Approval for the Title VI Plan	

Executive Summary

<u>The Opportunity Tree's</u> Mission is to provide quality, individualized supports to people with intellectual and developmental disabilities in dynamic and innovative environments. The Opportunity Tree is a 501c3 non-profit organization serving people with intellectual and developmental disabilities across Arizona in a variety of capacities. Programs and services include Youth Transitions Services, Employment Services Programs, Day Programs for Adults, Home and Community Based Services, and Community Living/Residential opportunities state-wide. The Opportunity Tree's programs and services operate at campuses in Phoenix, Casa Grande, Maricopa and Avondale, 20 community integrated Group Homes in Phoenix and Casa Grande, several Individualized Living Arrangements (IDLA's) in Phoenix, and a multitude of Respite/Habilitation/Attendant Care services in Members' private homes state-wide.

Proudly serving over 250 Members agency-wide, The Opportunity Tree has been providing services to people with disabilities for over 60 years, is home to over 300 employees, and counts over 60 vehicles in the fleet. A crucial part of the agency's programs and services includes transportation to/from Members' homes as well as various community locations for employment, independent living skill building, and socialization. The Opportunity Tree has been a section 5310 sub-recipient since 2019 and uses 5310 funded vehicles for transportation critical to the success, mobility, service provision, and independence of people with disabilities in the community.



The Opportunity Tree's organizational chart

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?

 \Box If yes, please attach a copy of your FTA letter of approval of Title VI Plan.

 $\boxtimes No$

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA The Opportunity Tree

The Opportunity Tree 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 **The Opportunity Tree**.

For more information on the **The Opportunity Tree**'s civil rights program, and the procedures to file a complaint, contact **Neal Hallihan- Chief Operating Officer**, **602-956-0400 Ext. 206**, **(TTY 1-800-842-2088)**; **email nhallihan@theopportunitytree.org**; or visit our administrative office at **3146 E. Windsor Ave.**, **Phoenix**, **AZ 85008**. For more information, visit **www.theopportunitytree.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 Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org. *Para información en Español llame: Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA The Opportunity Tree

The Opportunity Tree (*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 **The Opportunity Tree**, y los procedimientos para presentar una queja, contacte **Neal Hallihan- Chief Operating Officer 602-956-0400 Ext. 206**, (**TTY 1-800-842-2088**); o visite nuestra oficina administrativa en **3146 E. Windsor Ave.**, **Phoenix, AZ 85008**. Para obtener más información, visite **www.theopportunitytree.org**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona **(ADOT)**. Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte **(FTA)**. Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: **The Opportunity Tree's campus lobbies (Phoenix:** 3146 E. Windsor Ave., Phoenix, 85008. Casa Grande: 209 W. 1st St., Casa Grande, 85122. Maricopa: 19756 John Wayne Pkwy., Maricopa, 85739. Avondale: 328 W. Western Ave., Avondale, 85323) and on 5310 funded transit vehicles.

This notice is posted online at www.theopportunitytree.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 **The Opportunity Tree** 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 The Opportunity Tree 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 The Opportunity Tree or submitted to the State or Federal authority for guidance.

7

- (7) **The Opportunity Tree** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at <u>civilrightsoffice@azdot.gov</u>.
- (8) The Opportunity Tree 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 **The Opportunity Tree** decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: <u>ADOT</u>: ATTN ADA/Title VI Program Coordinator 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: 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.theopportunitytree.org.

If information is needed in another language, please contact: **Neal Hallihan-Chief Operating Officer**, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org

*Para información en Español llame: Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org

Discrimination ADA/Title VI Complaint Form

Section I:						
Name:						
Address:						
Telephone (Home):	Telephone (W	ork):				
Electronic Mail Address:						
Accossible Format Requirements?	🗆 Large Print		🗌 Αι	idio Tape		
Accessible Format Requirements?	🗆 TDD		🗆 Ot	her		
Section II:						
Are you filing this complaint on your own behalf	?	□ Yes*		🗆 No		
*If you answered "yes" to this question, go to Se	ection III.					
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 par	ty:					
Please confirm that you have obtained the perm	nission of the	□ Yes		🗆 No		
aggrieved party if you are filing on behalf of a th	ird party.					
Section III:						
I believe the discrimination I experienced was based on (check all that apply):						
□ Race □ Color □ Nationa	l Origin	🗆 Disa	bility			
Date of Alleged Discrimination (Month, Day, Yea	ır):		_			
Explain as clearly as possible what happened an	d why you belie	ve you we	ere diso	criminated		
against. Describe all persons who were involved	. Include the na	me and co	ontact	information of		
the person(s) who discriminated against you (if	known) as well a	as names	and co	ntact		
information of any witnesses. If more space is n	eeded, please u	se the bad	ck of th	nis form.		
Section VI:						
Have you previously filed a Discrimination Comp	plaint with this		25	🗆 No		
agency?				•		

If yes, please provide any reference informatic	on regarding your previous complaint.
Section V:	
	ederal, 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 pe	erson 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 info	rmation 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:	

The Opportunity Tree Neal Hallihan- Chief Operating Officer 3146 E. Windsor Ave., Phoenix, AZ 85008 602-956-0400 Ext. 206 nhallihan@theopportunitytree.org

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

If information is needed in another language, contact Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org. *Para información en Español llame: Neal Hallihan-Chief Operating Officer, 602-956-0400 Ext. 206, nhallihan@theopportunitytree.org

Titulo VI Forma para poner una Queja

Section I:					
Nombre:					
Dirección:					
Teléfono (Casa):	no (Casa): Teléfono (Trabajo):				
Correo electrónico:					
¿Requiere acomodaciones/adaptaciones?	Texto grande 🛛 Grabación			abación	
crequiere acomodaciones/adaptaciones:	🗆 TDD		🗆 Ot	ra	
Section II:					
¿Está llenando esta forma para Usted mismo?		□Sí*		□No	
*Si contestó 'Si', favor de seguir a Sección III.					
Si contestó 'No', favor de suministrar el nombre					
de la persona para quien esta poniendo esta					
queja, y indicar su relación con esa persona.					
Favor de explicar por qué está Ud. llenando esa	forma para otra	persona:			
Favor de confirmar que ha obtenido permisión p	oor la parte de	🗆 Sí		□No	
la persona para quien está poniendo esta queja.					
Section III:					
¿Cuál de las siguientes razones describe por lo q	ue usted siente q	ue se le di	scrimin	ó?	
	·			ó?	
	ue usted siente q Nacionalidad D			ó?	
🗆 Raza 🗆 Color 🗆 I	Nacionalidad 🗆 🛛			ó?	
	Nacionalidad 🗆 🛛			ó? 	
🗆 Raza 🗆 Color 🗆 I	Nacionalidad 🗆 [, Ano)?	Discapacid	ad		
Raza Color ا En qué fecha(s) sucedió la discriminación (Mes, Día	Nacionalidad 🗆 [, Ano)?	Discapacid	ad		
□ Raza □ Color □ I ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su	Nacionalidad 🗆 [, Ano)?	Discapacid	ad		
□ Raza □ Color □ I ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su	Nacionalidad 🗆 [, Ano)?	Discapacid	ad		
□ Raza □ Color □ I ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja).	Nacionalidad [, Ano)? cedió y quién cre	Discapacid e usted qu	ad Ie fue ro	esponsable (si	
□ Raza □ Color □ I ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su	Nacionalidad [, Ano)? cedió y quién cre	Discapacid e usted qu	ad Ie fue ro	esponsable (si	
□ Raza □ Color □ f ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja). 	Nacionalidad [, Ano)? cedió y quién cre	Discapacid e usted qu	ad Ie fue ro	esponsable (si	
□ Raza □ Color □ f ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja). 	Nacionalidad [, Ano)? cedió y quién cre	Discapacid e usted qu	ad Ie fue ro	esponsable (si	
□ Raza □ Color □ f ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja). 	Nacionalidad [, Ano)? cedió y quién cre	Discapacid e usted qu	ad Ie fue ro	esponsable (si	
□ Raza □ Color □ f ¿En qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja). 	Nacionalidad , Ano)? cedió y quién cre e puedan tener c	Discapacid	e fue re to de la	esponsable (si	
 □ Raza □ Color □ I ċEn qué fecha(s) sucedió la discriminación (Mes, Día Describa la presunta discriminación. Explique qué su necesita más espacio, agregue otra hoja). Escriba una lista con los nombres de las personas que discriminación y cómo contactarlas. Section IV: 	Nacionalidad , Ano)? cedió y quién cre e puedan tener c	Discapacid e usted qu	e fue re to de la	esponsable (si	

Suministre detalles y información sobre esa que	ja.
Section V:	
¿Ha presentado esta queja con otra agencia fed	eral, estatal o local, o con cualquier corte
federal o estatal?	
🗆 Sí 🔹 🗆 No	
Marque todas las que apliquen:	
Agencia Federal:	
Corte Federal:	Agencia Estatal:
Corte Estatal:	🗌 Agencia Local:
Por favor proporcione información de la person	a a la que presentó su queja en la
agencia/corte.	
Nombre:	
Título:	
Agencia:	
Dirreción:	
Teléfono:	
Section VI:	
Nombre de la agencia contra que esta la queja:	
Nombre de la persona contra que esta la queja:	
Título:	
Dirreción:	
Teléfono:	

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

Firma de la Persona que presenta la queja

Fecha

Someta la forma y cualquier información adicional a: The Opportunity Tree, Neal Hallihan- Chief Operating Officer 3146 E. Windsor Ave. Phoenix, AZ 85008 602-956-0400 ext. 206 nhallihan@theopportunitytree.org Esa forma esta accesible en www.theopportunitytree.org

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

The Opportunity Tree has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in the entire review period which began in 2020.

Public Participation Plan

The Opportunity Tree 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, **The Opportunity Tree** 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.

 $\boxtimes\,$ Expanded the distribution of agency brochures

Advertised public announcements through newspapers, fliers, or radio. Dates of this outreach include: 9/7/2021, 10/18/21, 9/7/22, 7/26/23, 1/8/24, 5/3/24

oxtimes Posted the Nondiscrimination Public Notices to the following locations:

 $oxed{intermation}$ Within transportation vehicles

⊠ Lobby of agency

- Partnered with other local agencies and school districts to advertise services provided. Dates of this outreach include: 7/30/21, 8/16/21, 8/19/21, 8/30/21, 9/8/21, 9/13/21, 9/15/21, 9/22/21, 9/30/21, 10/18/21, 11/15/21, 12/8/21, 1/11/22, 1/13/22, 1/21/22, 2/23/22, 2/28/22, 3/9/22, 3/31/22, 4/6/22, 4/12/22, 9/9/22, 10/6/22, 2/8/23, 2/9/23, 3/1/23, 3/16/23, 9/18/23, 10/19/23, 11/4/23, 11/15/23, 1/23/24, 1/25/24, 2/24/24, 2/29/24, 3/5/24, 3/7/24, 4/6/24, 4/9/24, 4/13/24, 4/26/24
- ⊠ Hosted public information meetings and or hearings. All of the agency's outreach events listed in the Public Participation Plan are openly advertised and available to the community.
- Added public interactive content to the agency's webpage & social media sites for the public, to communicate schedule changes or activities (<u>www.theopportunitytree.org</u>, <u>www.facebook.com/TheOpportunityTree</u>, <u>www.instagram.com/the_opportunitytree</u>, <u>https://www.linkedin.com/company/the-opportunity-tree/</u>, <u>https://twitter.com/Opportunitytree</u>)
- ⊠ Hosted an information booth at a community event (Arizona Autism Coalition's annual Autism Expo on 5/1/21, 4/15/23, 4/13/24
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures
- \boxtimes List other:

☑ Conducted outreach and informational meetings to multiple school districts in Phoenix, Casa Grande, Avondale, and Maricopa that included presentations about services and programs to school administrators, teachers, parents, students, and school personnel. Dates of this outreach include: 7/30/21, 8/16/21, 8/19/21, 8/30/21, 9/8/21, 9/13/21, 9/15/21, 9/22/21, 9/30/21, 10/18/21, 11/15/21, 12/8/21, 1/11/22, 1/13/22, 1/21/22, 2/23/22, 2/28/22, 3/9/22, 3/31/22, 4/6/22, 4/12/22, 9/9/22, 10/6/22, 2/8/23, 2/9/23, 3/1/23, 3/16/23, 9/18/23, 10/19/23, 11/4/23, 11/15/23, 1/23/24, 1/25/24, 2/24/24, 2/29/24, 3/5/24, 3/7/24, 4/6/24, 4/9/24, 4/13/24, 4/26/24
☑ Conducted campus tours at all locations to community members, prospective people seeking services, special education classrooms, parents, guardians and people with disabilities. Dates of this outreach include: 10/28/21, 11/3/21, 11/10/21, 11/22/21, 12/2/21, 1/19/22, 1/24/22, 4/19/22, 4/26/22, 11/10/22, 4/11/23, 4/18/23, 10/3/23, 11/3/23, 11/9/23, 11/13/23, 12/1/23, 1/26/24, 2/20/24, 2/29/24, 3/27/24, 4/5/24, 5/9/24

The Opportunity Tree will make the following community outreach efforts for the upcoming year:

- \boxtimes Expand the distribution of agency brochures
- oxtimes Advertise public announcements through newspapers, fliers, or radio
- \boxtimes Post the Nondiscrimination Public Notices to the following locations:
 - ☑ Within transportation vehicles
 - \boxtimes Lobby of agency
- oxtimes Partner with other local agencies and school districts to advertise services provided.
- \boxtimes Host public information meetings and or hearings.
- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- $oxed{intermation}$ 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.
- oxtimes List other

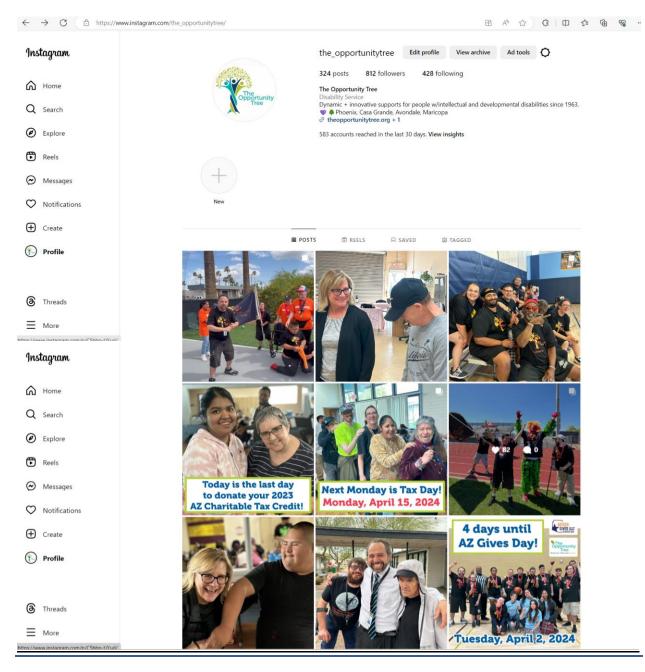
Conduct outreach and informational meetings to multiple school districts in Phoenix, Casa Grande, Avondale, and Maricopa that included presentations about services and programs to school administrators, teachers, parents, students, and school personnel

☑ Conduct campus tours at all locations to community members, prospective people seeking services, special education classrooms, parents, guardians and people with disabilities
 ☑ Continue to attend Title VI & CAG meetings, and PASS Trainings

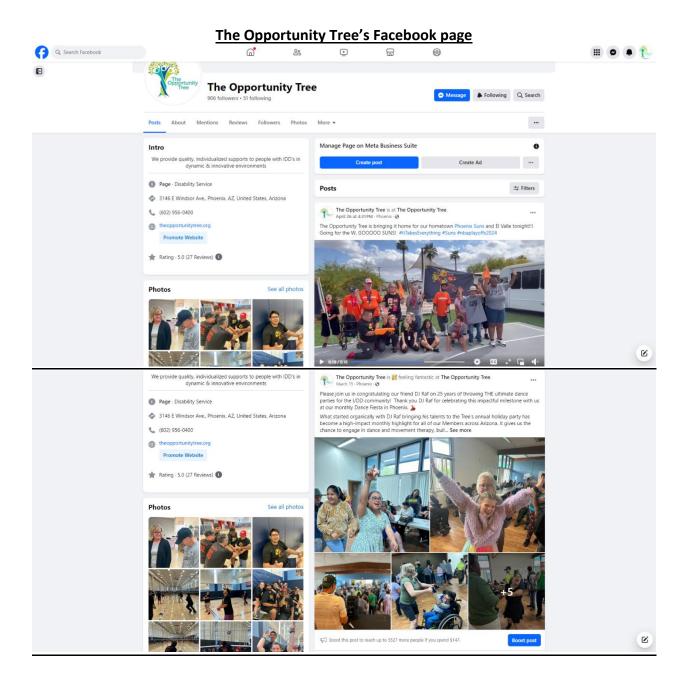
SAMPLE DOCUMENTS OF THE OPPORTUNITY TREE'S PUBLIC PARTICIPATION METHODS



The Opportunity Tree's website - "News" page



The Opportunity Tree's Instagram page



The Opportunity Tree's "SEEDS" employment services fliers in both English and Spanish



The Opportunity Tree's "Tree Fort" youth program fliers in both English and Spanish



Limited English Proficiency Plan

The Opportunity Tree 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 **The Opportunity Tree** 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 **The Opportunity Tree**'s extent of obligation to provide LEP services, the **The Opportunity Tree** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

Language Spoken At Home By Ability To Speak English For The Population 5 Years and Older						
2015	: ACS 5-Year	Estimates Det	ailed Table	<u>s</u>		
	Casa Grande City,		<u>Phoenix City,</u>			
	<u>/</u>			<u>Maricopa City, Arizona</u>		<u>ona</u>
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:	46,296	±483	41,913	±441	1,400,199	±1,965
Speak only English	34,742	±1,194	34,232	±765	881,814	±6,016
Spanish or Spanish Creole:	9,695	±966	5,436	±723	430,812	±5,405
Speak English "very well"	7,187	±871	4,375	±651	266,156	±4,996
Speak English less than "very well"	2,508	±540	1,061	±267	164,656	±3,437
French (incl. Patois, Cajun):	41	±44	246	±247	3,961	±611
Speak English "very well"	41	±44	202	±188	3,121	±463
Speak English less than "very well"	0	±29	44	±64	840	±271
French Creole:	0	±29	4	±7	221	±128
Speak English "very well"	0	±29	4	±7	161	±117
Speak English less than "very well"	0	±29	0	±26	60	±60
Italian:	36	±60	13	±15	1,434	±301
Speak English "very well"	36	±60	13	±15	1,087	±262
Speak English less than "very well"	0	±29	0	±26	347	±137
Portuguese or Portuguese Creole:	47	±57	61	±82	836	±220
Speak English "very well"	38	±45	50	±64	703	±203
Speak English less than "very well"	9	±14	11	±21	133	±65
German:	98	±138	206	±119	4,187	±547
Speak English "very well"	92	±137	157	±85	3,718	±494
Speak English less than "very well"	6	±10	49	±47	469	±212
Yiddish:	0	±29	0	±26	53	±37

1) The number or proportion of LEP persons eligible in the **The Opportunity Tree** service area who may be served or likely to encounter by **The Opportunity Tree** program, activities, or services;

Speak English "very well"	0	±29	0	±26	53	±37
Speak English less than "very well"	0	±29	0	±26	0	±29
Other West Germanic languages:	0	±29	17	±25	582	±235
Speak English "very well"	0	±29	17	±25	473	±205
Speak English less than "very well"	0	±29	0	±26	109	±69
Scandinavian languages:	0	±29	0	±26	502	±179
Speak English "very well"	0	±29	0	±26	458	±176
Speak English less than "very well"	0	±29	0	±26	44	±37
Greek:	0	±29	0	±26	733	±256
Speak English "very well"	0	±29	0	±26	537	±203
Speak English less than "very well"	0	±29	0	±26	196	±115
Russian:	71	±83	11	±13	2,879	±868
Speak English "very well"	30	±50	11	±13	1,900	±589
Speak English less than "very well"	41	±46	0	±26	979	±336
Polish:	82	±89	18	±30	1,911	±438
Speak English "very well"	39	±44	18	±30	1,529	±423
Speak English less than "very well"	43	±50	0	±26	382	±143
Serbo-Croatian:	0	±29	48	±67	4,773	±997
Speak English "very well"	0	±29	48	±67	2,759	±710
Speak English less than "very well"	0	±29	0	±26	2,014	±440
Other Slavic languages:	0	±29	23	±27	1,266	±378
Speak English "very well"	0	±29	23	±27	920	±290
Speak English less than "very well"	0	±29	0	±26	346	±179
Armenian:	0	±29	0	±26	449	±315
Speak English "very well"	0	±29	0	±26	393	±313
Speak English less than "very well"	0	±29	0	±26	56	±56
Persian:	0	±29	8	±12	2,178	±745
Speak English "very well"	0	±29	8	±12	1,194	±477
Speak English less than "very well"	0	±29	0	±26	984	±354
Gujarati:	77	±97	0	±26	842	±286
Speak English "very well"	69	±87	0	±26	603	±191
Speak English less than "very well"	8	±11	0	±26	239	±140
Hindi:	15	±27	33	±40	3,541	±701
Speak English "very well"	7	±15	33	±40	3,042	±615
Speak English less than "very well"	8	±13	0	±26	499	±194
Urdu:	0	±29	8	±12	236	±127
Speak English "very well"	0	±29	8	±12	209	±118
Speak English less than "very well"	0	±29	0	±26	27	±30
Other Indic languages:	20	±33	0	±26	2,621	±647
Speak English "very well"	20	±33	0	±26	1,775	±496
Speak English less than "very well"	0	±29	0	±26	846	±287

Other Indo-European languages:	22	±27	0	±26	2,887	±640
Speak English "very well"	22	±27	0	±26	1,779	±405
Speak English less than "very well"	0	±29	0	±26	1,108	±337
Chinese:	62	±75	61	±64	5,566	±740
Speak English "very well"	33	±42	12	±14	2,601	±470
Speak English less than "very well"	29	±38	49	±56	2,965	±486
Japanese:	4	±8	30	±39	1,135	±304
Speak English "very well"	4	±8	30	±39	623	±196
Speak English less than "very well"	0	±29	0	±26	512	±211
Korean:	57	±68	293	±257	1,574	±346
Speak English "very well"	57	±68	287	±260	868	±284
Speak English less than "very well"	0	±29	6	±11	706	±174
Mon-Khmer, Cambodian:	0	±29	0	±26	452	±198
Speak English "very well"	0	±29	0	±26	278	±131
Speak English less than "very well"	0	±29	0	±26	174	±85
Hmong:	0	±29	0	±26	91	±127
Speak English "very well"	0	±29	0	±26	66	±92
Speak English less than "very well"	0	±29	0	±26	25	±35
Thai:	0	±29	41	±56	522	±241
Speak English "very well"	0	±29	0	±26	266	±186
Speak English less than "very well"	0	±29	41	±56	256	±147
Laotian:	0	±29	212	±205	402	±162
Speak English "very well"	0	±29	212	±205	230	±105
Speak English less than "very well"	0	±29	0	±26	172	±112
Vietnamese:	88	±62	282	±238	6,238	±1,132
Speak English "very well"	60	±43	97	±97	2,526	±684
Speak English less than "very well"	28	±22	185	±160	3,712	±697
Other Asian languages:	66	±89	0	±26	6,903	±932
Speak English "very well"	6	±12	0	±26	4,322	±687
Speak English less than "very well"	60	±89	0	±26	2,581	±573
Tagalog:	399	±194	278	±166	5,109	±707
Speak English "very well"	269	±169	238	±162	3,467	±604
Speak English less than "very well"	130	±71	40	±35	1,642	±375
Other Pacific Island languages:	229	±188	37	±57	1,855	±410
Speak English "very well"	74	±88	10	±19	1,055	±237
Speak English less than "very well"	155	±194	27	±51	800	±332
Navajo:	7	±22	0	±26	4,925	±788
Speak English "very well"	4	±11	0	±26	4,231	±742
Speak English less than "very well"	3	±12	0	±26	694	±244
Other Native North American languages:	262	±334	123	±150	1,442	±455
Speak English "very well"	262	±334	94	±143	1,097	±368

Speak English less than "very well"	0	±29	29	±43	345	±143
Hungarian:	0	±29	7	±12	336	±139
Speak English "very well"	0	±29	0	±26	266	±122
Speak English less than "very well"	0	±29	7	±12	70	±44
Arabic:	107	±135	43	±50	6,296	±993
Speak English "very well"	17	±26	28	±32	3,773	±687
Speak English less than "very well"	90	±111	15	±23	2,523	±589
Hebrew:	0	±29	0	±26	826	±321
Speak English "very well"	0	±29	0	±26	673	±286
Speak English less than "very well"	0	±29	0	±26	153	±116
African languages:	46	±53	37	±57	5,846	±935
Speak English "very well"	46	±53	37	±57	2,554	±539
Speak English less than "very well"	0	±29	0	±26	3,292	±702
Other and unspecified languages:	23	±39	105	±152	1,963	±709
Speak English "very well"	23	±39	54	±86	1,005	±398
Speak English less than "very well"	0	±29	51	±68	958	±451

2) The frequency with which LEP individuals come in contact with an **The Opportunity Tree** services;

The Opportunity Tree's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for the entire review period which began in 2020. The Opportunity Tree averages Forty contacts per Month.

3) The nature and importance of the program, activities or services provided by the **The Opportunity Tree** to the LEP population.

The Opportunity Tree provides agency services & transportation related information in English, Spanish, and in additional languages specific to the LEP community as needed. Transportation services are provided and critical to transport the agency's Members with disabilities between their homes and program locations, to/from employment opportunities in the community, to/from quality of life community integration opportunities and to/from medical services and appointments. Agency Members and families within LEP populations do not have to struggle with the challenges of translating and deciphering transportation, program, and service related notices into their primary languages because alternative, LEP specific, language notices are included in overall service delivery to Members.

4) The resources available to **The Opportunity Tree** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

The Opportunity Tree employs bilingual staff who speak, read, and write Spanish as well as staff who are fluent in American Sign Language in order to provide interpretative and translation services to LEP populations. Agency staff translate LEP communications including posted notices, documents, forms, verbal communications, and more. If agency staff are not available for interpretive and/or translation services, **The Opportunity Tree** contracts these services at no cost to the LEP population. On average,

the agency spends \$3100 in American Sign Language interpretive services and \$500 in Spanish interpretive services annually.

The Opportunity Tree provides a statement in Spanish, and in additional languages specific to the LEP community, 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

The Opportunity Tree 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
- (7) Program fliers and publications
- (8) Agency intake packets for new Members/clients
- (9) General Consent and service authorization forms
- (10)Member/client rights documents
- (11)Member/client satisfaction survey

1) The Opportunity Tree provides language assistance services through the below methods:

- Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
- Instructions are provided to customer service staff and other **The Opportunity Tree** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
- ⊠ Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
- \boxtimes Use of "I Speak" cards.
- Bilingual or multilingual versions of:

□ "How to ride" brochures

 \Box System maps and timetables

- Safety and security announcements
- \square Service change announcements

 \boxtimes List other:

- \boxtimes The Opportunity retains staff who are bilingual in both English and Spanish and available to the public as needed
- \boxtimes The Opportunity Tree contracts professional translation services to translate essential documents from English to Spanish

2) **The Opportunity Tree** has a process to ensure the competency of interpreters and translation service through the following methods:

The Opportunity Tree 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. **The Opportunity Tree** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **The Opportunity Tree** 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. **The Opportunity Tree** 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) **The Opportunity Tree** provides notice to LEP persons about the availability of language assistance through the following methods:

- oxtimes Posting signs in intake areas and other points of entry
- \boxtimes Statements in outreach documents that language services are available from the agency.
- ⊠ Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
- Announcements at community meetings
- \boxtimes Information tables at local events
- Signs and handouts available in vehicles and at stations
- Announcements in vehicles and at stations
- \boxtimes Agency websites
- \boxtimes Customer service lines
- □ List other___

4) **The Opportunity Tree** monitors, evaluates and updates the LEP plan through the following process:

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

The Opportunity Tree 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. The Opportunity Tree 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. The Opportunity Tree 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. The Opportunity Tree will implement LEP training to be provided for agency staff. The Opportunity Tree staff training for LEP to include:

- A summary of the **The Opportunity Tree** responsibilities under the DOT LEP Guidance;
- A summary of the **The Opportunity Tree** language assistance plan;
- A summary of the number and proportion of LEP persons in the **The Opportunity Tree** 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 **The Opportunity Tree** cultural sensitivity policies and practices.

SAMPLE DOCUMENTS THE OPPORTUNITY TREE PROVIDES FOR LEP INDIVIDUALS









Padres y familias- Favor de únirse al tour para conocer más sobre nuestros programs gratis para estudiantes.

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.

The Opportunity Tree does <u>not</u> 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.

The Opportunity Tree does <u>not</u> monitor subrecipients for Title VI compliance as it does not have any FTA subrecipients.

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.

The Opportunity Tree 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)

The Opportunity Tree is <u>not</u> a Fixed Route Transit Provider.

Board Approval for the Title VI Plan

To be included once Title VI plan is approved.