Title VI Implementation Plan

Beacon Group

July 1, 2020 – June 30, 2023
# Title VI Implementation Plan

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Title VI Policy Statement

Beacon Group assures full compliance with Title VI of the Civil Rights act of 1964 and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any Beacon Group sponsored program or activity. There is no distinction between the sources of funding.

Beacon Group 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, Beacon Group will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Beacon Group distributes Federal-aid funds to another entity/person, Beacon Group will ensure all subrecipients fully comply with Beacon Group Title VI Nondiscrimination Program requirements. The President/CEO has delegated the authority to Wendy Rosado-Toth, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

______________________
Greg Natvig, President/CEO

Feb 27, 2020
Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Beacon Group

Beacon Group operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Beacon Group.

For more information on Beacon Group’s civil rights program, and the procedures to file a complaint, contact Wendy Rosado-Toth at 520-622-4874 x130, (TTY 800-842-4681); wtoth@beacongroup.org; or visit our administrative office at 308 W. Glenn St, Tucson, AZ 85705. For more information, visit beacongroup.org.

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: City of Phoenix Public Transit Department: ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 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 520-622-4874 x130. Para información en Español llame: Carla Sanchez at 520-622-4874 x107 or Jessica Hardemon at 602-685-9703 x204.
Aviso al Público Sobre los Derechos Bajo el Título VI
Beacon Group

Beacon Group (y sus subcontratistas, si cualquiera) asegura complir con el Título VI de la Ley de los Derechos Civiles de 1964. El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la Beacon Group’s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Wendy Rosado-Toth, 520-622-4874 x130, (TTY 800-842-4681); o visite nuestra oficina administrativa en 308 W. Glenn St. Tucson, AZ 85705. Para obtener más información, visite beacongroup.org

El puede presentar una queja directamente con City of Phoenix Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN Title VI Coordinator 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted at Beacon Group’s headquarters, located at 308 W. Glenn St., specifically in the main lobby, client breakroom, online, and on all vehicles transporting Beacon Group clients.

This notice is posted online at beacongroup.org
Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to any program or activity that is administered by Beacon Group 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, or national origin 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 Beacon Group 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 Beacon Group or submitted to the State or Federal authority for guidance.

7. Beacon Group will notify the Title VI Coordinator of ALL Title VI complaints within 72 hours via telephone at 602-534-3026; email at phxtransiteo@phoenix.gov.
(8) Beacon Group has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 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 30 days after the date of the letter or the LOF to do so.

City of Phoenix Public Transit Department (COP):
Attention: Title VI Coordinator
302 N. 1st Avenue, Suite 900
Phoenix, AZ 85003

(10) A complainant dissatisfied with Beacon Group decision may file a complaint with the City of Phoenix (COP) or the Federal Transit Administration (FTA) offices of Civil Rights: 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: beacongroup.org
Title VI Complaint Form

<table>
<thead>
<tr>
<th>Section I:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Telephone (Home):</td>
</tr>
<tr>
<td>Electronic Mail Address:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Accessible Format Requirements?</th>
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<tbody>
<tr>
<td>☐ Large Print</td>
</tr>
<tr>
<td>☐ TDD</td>
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</table>

<table>
<thead>
<tr>
<th>Section II:</th>
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</thead>
<tbody>
<tr>
<td>Are you filing this complaint on your own behalf?</td>
</tr>
</tbody>
</table>

*If you answered “yes” to this question, go to Section 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 party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. | ☐ Yes | ☐ No |

<table>
<thead>
<tr>
<th>Section III:</th>
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<tbody>
<tr>
<td>I believe the discrimination I experienced was based on (check all that apply):</td>
</tr>
<tr>
<td>☐ Race</td>
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</table>

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.


<p>|</p>
<table>
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<tr>
<th>Section VI:</th>
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<tbody>
<tr>
<td>Have you previously filed a Title VI complaint with this agency?</td>
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</tbody>
</table>
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:
Beacon Group, Title VI Coordinator
308 W. Glenn St.
Tucson, AZ 85705
520-622-4874

A copy of this form can be found online at beacongroup.org
Nota: La siguiente información se necesita para procesar su queja.

Información de la persona que está poniendo la queja:

Nombre: Dirección: _____________________________________________
Ciudad/Estado/Código Postal: _______________________________________
Teléfono(Casa): ___________________________________________________
Teléfono (Trabajo): ________________________________________________

Persona A La Que Se Discriminó (alguien que no sea la persona que está
poniendo la queja)

Nombre: Dirección: _____________________________________________
Ciudad/Estado/Código Postal: _______________________________________
Teléfono(Casa): ___________________________________________________
Teléfono (Trabajo): ________________________________________________

¿Cuál de las siguientes razones describe por lo que usted siente que se le
discriminó?

Raza/Color (Especifique) __________ Nacionalidad (Especifique) ________
Sexo (Especifique) __________________

¿En qué fecha(s) sucedió la discriminación? __________________________

Describa la presunta discriminación. Explique qué sucedió y quién cree usted
que fue responsable (si necesita más espacio, agregue otra hoja).

___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
Escriba una lista con los nombres de las personas que puedan tener conocimiento de la presunta discriminación y cómo contactarlas.

__________________________________________________________________
__________________________________________________________________
__________________________________________________________________
__________________________________________________________________
__________________________________________________________________

¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal? Marque todas las que apliquen.

Agencia Federal ______  Corte Estatal ______  Corte Federal ___  
Agencia Local ______  Agencia Estatal ______

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre: ____________________________
Dirección: __________________________
Ciudad/Estado/Código Postal: _________________
Teléfono(Casa): _________________________
Teléfono (Trabajo): _______________________  

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

Firma de la Persona que presenta la queja ___________  Fecha ___________

Número de Anexos: ____________________________

Someta la forma y cualquier información adicional a:
Beacon Group, Title VI Coordinator
308 W. Glenn St.
Tucson, AZ 85705
520-622-4874

A copy of this form can be found online at beacongroup.org
# 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.

<table>
<thead>
<tr>
<th>Description/Name</th>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, national origin or disability)</th>
<th>Status</th>
<th>Action(s) Taken (Final findings?)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
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<td>Lawsuits</td>
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<td>Complaints</td>
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Beacon Group has not had any Title VI complaints, investigations, or lawsuits in 2019.
Beacon Group
Public Participation Plan
Beacon Group 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, Beacon Group made the following community outreach efforts:

- Expanded the distribution of agency brochures
- Posted the Nondiscrimination Public Notices to the following locations:
  - Within transportation vehicles
  - Pick up and drop off stations
  - Lobby of agency
- Partnered with other local agencies to advertise services provided
- Hosted an information booth at a community event (DREAM Job Fair)
-Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

In the upcoming year Beacon Group will make the following community outreach efforts:

- Expanded the distribution of agency brochures
- Posted the Nondiscrimination Public Notices to the following locations:
  - Within transportation vehicles
  - Pick up and drop off stations
  - Lobby of agency
- Partnered with other local agencies to advertise services provided
- Hosted an information booth at a community event (DREAM Job Fair)
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

Public Meetings:

1. Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

2. When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.

3. Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.
Limited English Proficiency Plan

Beacon Group

Limited English Proficiency Plan
Beacon Group 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 Beacon Group 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 Beacon Group’s extent of obligation to provide LEP services, the Beacon Group 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 Beacon Group service area who may be served or likely to encounter by Beacon Group program, activities, or services;

According to American Community Survey Table 66. Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Phoenix-Mesa-Scottsdale, AZ: 2009-2013, there are 1,025,834 individuals over the age of 5 that speak a language other than English at home, representing 26% of the population (21% of which speak Spanish at home). Beacon Group serves adults with disabilities, so this represents a much smaller number of individuals who may be eligible for services. In Maricopa County, approximately 10% of individuals are LEP, of which 8% of that are Spanish-speakers. (LEP.gov maps)

2) The frequency with which LEP individuals come in contact with an Beacon Group services;

Although Spanish speaking individuals with LEP represent approximately 8% of the population; historically Beacon Group has served an overall Hispanic/Latino population of approximately 25%. Internal reporting data would indicate that 25% of that 25% figure (approximately 6.25% overall are Spanish-speaking with LEP). Whether we use our own internal data or the U.S. Census Bureau data, both are above the DOJ’s Safe Harbor provision that stipulates that materials should be translated when 5% or 1,000 persons, whichever is less, speak English less than “very well”. As such, Beacon Group translates vital documents and public notices to meet this requirement and provides Spanish-speaking interpreters as needed/requested.

3) The nature and importance of the program, activities or services provided by the Beacon Group to the LEP population; and

Beacon Group’s transportation planning and its inclusion of Spanish-speaking LEP individuals in that planning process is integrally important to the continued provision of quality services. Beacon Group does not operate a transportation program that is available to the public in general; it only provides transportation services to the persons with disabilities who receive rehabilitation services; specifically, those persons with disabilities who receive Group Supported Employment, Transition to Employment, Career Preparation and Readiness, and Pre-Employment Transition, and Day Treatment and Training services. Beacon Group must ensure that all segments of the population we
serve, including persons with LEP have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and policy. In addition, we are responsible to ensure that environmental, health, and safety issues are considered in the transportation planning process.

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

As discussed below, Beacon Group has already made an organizational commitment to ensuring that Spanish-speaking LEP individuals and individuals who are deaf/hard of hearing are provided with adequate materials in writing and appropriate interpreter services as needed/requested. As such, Beacon Group experiences no additional fiscal restraints in our day-to-day operations. We have ample resources already in place to provide such services.

A statement in Spanish 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**

Beacon Group 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
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. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Beacon Group does NOT select the membership of any transit-related committees, planning boards, or advisory councils.
Title VI Equity Analysis

A sub recipient 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.

Beacon Group has no current or anticipated plans to develop new transit facilities covered by these requirements.
Board Approval for the Title VI Program

The Beacon Group Board of Directors is scheduled to meet on Friday, March 27, 2020; at which time they will approve the Beacon Group 2020 Title VI Implementation Plan. Once approved by the Board of Directors, the Title VI Implementation Plan Assurance will be submitted.