



City of Phoenix
PUBLIC TRANSIT DEPARTMENT

February 22, 2019

Brian Scott
Friendship Village Tempe
2645 E. Southern Avenue
Tempe, AZ 85282

Re: Triennial Title VI Program update-concur letter with the understanding that items will be corrected.

Dear Brian Scott:

The City of Phoenix Public Transit Department has received and reviewed Friendship Village Tempe's Title VI program plan submitted on November 27, 2018. This Title VI program plan will be effective **January 9, 2019 to January 9, 2022.**

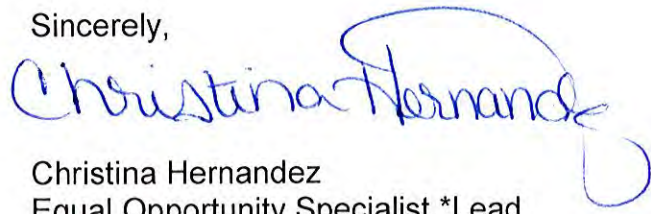
The Federal Transit Administration (FTA) requires recipients of federal funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Grantees" sets forth the information that should be included in these updates, and requires they be submitted as Title VI Programs every three years.

The Public Transit Department's review of your Title VI program considered all elements required by Department of Transportation regulation found at 49 C.F.R. § 21, as outlined in Circular 4702.1B, Chapter III. The review assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. Friendship Village Tempe must promptly address and correct the concerns identified with a "no" in the review assessment.

Your program status is now *Concur*. You must continue to properly implement your program to ensure public transportation services are provided in a nondiscriminatory manner, as required by Title VI of the Civil Rights Act of 1964.

Friendship Village Tempe's plan is good for three years, please submit **your next triennial Title VI program plan to the City of Phoenix sixty days prior to the due date of 1/9/22** along with the requested changes to this submission. The city of Phoenix has implemented a Title VI Annual reporting requirement attached to this document. The annual reporting period will begin on October 1st through September 30th of each year. The Annual Title VI report must be returned to the city of Phoenix Title VI Coordinator no later than October 15th of each year.

Sincerely,

A handwritten signature in blue ink that reads "Christina Hernandez". The signature is fluid and cursive, with a large loop at the end of the word "Hernandez".

Christina Hernandez
Equal Opportunity Specialist *Lead



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Title VI Program Review Assessment:

Items below identified as “YES” are included in the Title VI program review, and no changes are needed. Items identified as “NO” were not included or were insufficient and must be corrected. Carefully address all insufficient items, as indicated in this review letter, to ensure you are implementing your Title VI program in accordance with the regulations.

Chapter 3:

GENERAL REQUIREMENTS AND GUIDELINES

1. Does the program submission include appropriate documentation demonstrating that the transit board of directors has approved the Title VI program?

No. Board approval is required every time the plan is updated. Agency's must submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors has approved the Title VI Program.

Public Notice

2. Does the submission include a copy of the public notice informing the public of the protections against discrimination afforded to them under Title VI?

Yes

3. Is there a list of public locations where the notice is posted?

No. On your next Title VI submission please list the addresses for the locations you have listed within your plan specifically for the Human resources office and Environmental services office.

4. Did you verify the notice is posted on the agency's website and in the public areas of the agency's offices?

No. The Title VI notice could not be found on the Agency's website. Please provide this information or notify the City of Phoenix, Title VI coordinator when this has been completed. Provide notification within 60 days from the concurrence letter.

5. Does the public notice include how to request additional information on your Title VI obligations?

Yes

6. Does the public notice include how to file a complaint?

Yes

Complaint Procedures

7. Did you include the (internal to the agency) procedures for investigating and tracking Title VI complaints filed against them?

Yes

8. Did you include the instructions it gives to members of the public about how to file a Title VI discrimination complaint?

Yes

9. Are the procedures for filing a Title VI discrimination complaint available on the agency website?

No. The complaint procedures could not be found on the Agency's website. Please provide this information or notify the City of Phoenix, Title VI coordinator when this has been completed. Provide notification within 60 days from the concurrence letter.

Complaint Form

10. Does the program include a copy of the complaint form that specifies the three classes protected by Title VI (race, color, and national origin)?

Yes

11. Is the complaint form available on the agency's website?

No. The complaint forms could not be found on the Agency's website. Please provide this information or notify the City of Phoenix, Title VI coordinator when this has been completed. Provide notification within 60 days from the concurrence letter.

12. Did you include a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than city of Phoenix or Valley Metro; lawsuits; and/or complaints naming the recipient?

No. A list of transportation related Title VI investigations, complaints or lawsuits was not reported for the period of 2015-2018. On your next Title VI submission please include a section for "Title VI Investigation, Complaints, and Lawsuits".

Public Participation Plan

13. Did you include a Public Participation Plan that describes the proactive strategies procedures, and desired outcomes of public participation activities?

Yes

14. Does the Public Participation Plan include information on how the grantee considers the needs of, and engages minority and LEP populations in public participation activities?

Yes

15. Did you summarize the public outreach and involvement activities undertaken in the last 3 years?

Yes

LEP Four-Factor Analysis & Plan

16. Did you include a Language Assistance Plan?

Yes

17. Does the Language Assistance Plan include a Four-Factor Analysis that determines the appropriate level of LEP assistance and outreach efforts needed?

Yes

Board Selections

18. Did you select members to transit-related, non-elected boards, advisory councils or committees?

Agency does not have a transit related committee.

19. If you select members, did you provide a table with a racial breakdown of the membership of those boards, councils, or committees?

N/A

20. Did you describe how they encourage minorities to participate on these boards, councils, and committees?

N/A

Subrecipient

21. Does the program indicate if you have subrecipients?

Agency does not have subrecipients

22. If you have subrecipients, did you provide the monitoring procedures and/or efforts you use to ensure subrecipients comply with Title VI?

N/A

23. Did you describe the process used to provide assistance to subrecipients, when needed?

N/A

Facility Site Equity Analysis

24. Did you identify a site or location for a new facility (excluding bus shelters) or construct a facility during the period covered by your program?

Yes

25. Did you complete and submit an equity analysis conducted during the planning stage for all projects requiring land acquisition and displacement of persons from their residences and businesses?

N/A

26. Did the site analysis include outreach to persons potentially impacted by the siting of facilities?

N/A

27. Did the site analysis compare the equity impacts of alternative locations prior to selecting the preferred site?

N/A

28. Did you give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result?

N/A

29. Did you determine that the location of the project will result in a disparate impact on the basis of race, color, or national origin?

N/A

30. Did you provide a substantial legitimate justification for the project location? To do so, you must demonstrate that either 1) no alternative locations are available, or 2) any alternative locations, if identified, would result in the same or more disparate impact on the basis of race, color, or national origin.

N/A

