

# *Community Partners, Inc. Title VI Implementation Plan*

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# Contents

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Executive Summary .....	3
Title VI Policy Statement.....	4
Title VI Notice to the Public .....	5
Title VI Notice to the Public -Spanish.....	6
Discrimination ADA/Title VI Complaint Procedures .....	7
Discrimination ADA/Title VI Complaint Form .....	9
Discrimination ADA/Title VI Complaint Procedures - Spanish.....	13
Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits .....	15
Public Participation Plan.....	16
Limited English Proficiency Plan .....	18
Non-elected Committees Membership Table .....	22
Monitoring for Subrecipient Title VI Compliance .....	23
Title VI Training.....	24
Title VI Equity Analysis.....	25
Fixed Route Transit Provider Analysis .....	23
Board Approval for the Title VI Program .....	26
Organizational Chart.....	27

# Executive Summary

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The Community Partners, Inc., (CPI) core focus is providing improved health for our community through high quality behavioral health care services. Our team has served the mental health needs of the Tucson community for over 20 years, formerly as Community Partnership of Southern Arizona. We have also developed business, consulting and supportive services (such as housing programs) that benefit the people we serve as well as other nonprofits, organizations, government departments and health plans. We invite you to learn more about all of our businesses. Though our name has changed, our mission to serve our community remains steadfast.

Community Partnership Care Coordination (CPCC), a subsidiary of CPI, is a licensed Outpatient Treatment Center. CPCC's Home and Community Based Program is a unique blend of specialty services delivered in an enhanced community approach.

CPCC understands that individuals with significant to severe mental health concerns need an array of services, provided to them in their own environment. In this model, a multi-disciplinary team is in regular contact with each individual, eliminating issues such as transportation that can block access to care.

The team prioritizes the most vital needs of individuals seeking behavioral health treatment, using a Housing First approach to promote the individual's security, health and safety. The majority of treatment is provided in the community, beyond standard office hours, as needed by the individual. Staff transport members using personal vehicles, as well as CPCC vehicles.

We offer some of our programs to individuals with serious mental illness who are members with Cenpatico Integrated Care, the Regional Behavioral Health Authority for Southern Arizona. These programs include ACT teams and Housing programs. The ADOT grant of vehicles has allowed CPCC to expand its availability to transport members, particularly those members with disabilities.

## What type of program fund(s) did you apply for?

- 5310
- 5311
- Other (please explain) \_\_\_\_\_

## Type of Funding Requests? (Select all that apply)


- Vehicle Funds
- Operating Funds
- Other (please explain) \_\_\_\_\_

# **Non Discrimination Policy Statement**

The **Community Partners, Inc.** 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 **Community Partners, Inc.** sponsored program or activity. There is no distinction between the sources of funding.

**Community Partners, Inc.** 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, **Community Partners, Inc.** will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When **Community Partners, Inc.** distributes Federal-aid funds to another entity/person, **Community Partners, Inc.** will ensure all subrecipients fully comply with **Community Partners, Inc.** Title VI Nondiscrimination Program requirements. The **President/Chief Executive Officer** has delegated the authority to **Bethanne Enoki**, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements. Ms. Enoki is the Chief Human Resources Officer and reports directly to President/CEO.

  
Vanessa Seaney, Chief Operating Officer

# Non-Discrimination Notice to the Public - English

## Notifying the Public of Rights Under Title VI and ADA **Community Partners, Inc.**

**Community Partners, Inc.** 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 **Community Partners, Inc.**

For more information on the **Community Partners, Inc.**, civil rights program, and the procedures to file a complaint, contact **Bethanne Enoki at 520-325-4268 (TTY 866-318-6960)**; email **[Bethanne.enoki@communitypartnersinc.org](mailto:Bethanne.enoki@communitypartnersinc.org)**; or visit our administrative office at **4575 E Broadway Blvd. Tucson, Arizona 85711**. For more information, visit **[www.communitypartnersinc.org](http://www.communitypartnersinc.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. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **520-901-4800**. Para información en Español llame: **Noel Gonzalez a 520-325-4268**.

# Non-Discrimination Notice to the Public - Spanish

## **Aviso al Público Sobre los Derechos Bajo el Título VI Community Partners, Inc.**

Community Partners, Inc. (*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 provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la Community Partners, Inc.'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Bethanne Enoki: 520-325-4268, (TTY 866-937-7325); o visite nuestra oficina administrativa en 4575 E Broadway Blvd, Tucson, Arizona 85711. Para obtener más información, visite [www.CommunityPartnersInc.org](http://www.CommunityPartnersInc.org).

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in CPI business offices at the following locations: 4575 E Broadway Blvd, Tucson, Arizona 85711; 4601 E Broadway Blvd, Tucson, Arizona 85711; and 2502 N Dodge Blvd, Tucson, Arizona 85716.*

*This notice is posted online at  
[www.communitypartnersinc.org](http://www.communitypartnersinc.org)*

# Non-Discrimination 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 **Community Partners, Inc.**, 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, **Community Partners, Inc.** will review the complaint form to determine jurisdiction. All complainants will receive an acknowledgement letter informing her/him whether the complaint will be investigated by **Community Partners, Inc.** or submitted to the State or Federal authority for guidance.

- (7) **Community Partners, Inc.** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov).
- (8) **Community Partners, Inc.** has **30** days to investigate the complaint.  
If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has **15** 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 **15** 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 hard copy or email.
- (11) A complainant dissatisfied with **Community Partners, Inc.’s** decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT:** ATTN ADA/Title VI Program Coordinator, 206 S. 17<sup>TH</sup> Ave. MD 155A RM: 183, Phoenix AZ 85007 **FTA:** Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington DC 20590.
- (12) A copy of these procedures can be found online at: [www.communitypartnersinc.org](http://www.communitypartnersinc.org).



# Discrimination Complaint Form

<b>Section I:</b>		
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
<b>Section II:</b>		
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 <b>Section III</b>.</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
<b>Section III:</b>		
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.		
_____		
_____		
_____		
<b>Section VI:</b>		
Have you previously filed a Discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

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**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:

**Title VI Coordinator**

**Community Partners, Inc.**

**4575 E Broadway Blvd**

**Tucson, Arizona 85711**

**520-325-4268**

**Bethanne.enoki@communitypartnersinc.org**

A copy of this form can be found online at [www.communitypartnersinc.org](http://www.communitypartnersinc.org).

# **Procedimientos de queja del Título VI**

Estos procedimientos proporcionan orientación para todas las quejas presentadas en virtud del Título VI de la Ley de Derechos Civiles de 1964, Sección 504 del Acta de Rehabilitación de 1973 y la Ley de Estadounidenses con Discapacidades de 1990 (ADA) en lo que se refiere a cualquier programa o actividad que es administrado por Community Partners, Inc. incluyendo consultores, contratistas y proveedores. Las intimidaciones o represalias como consecuencia de una queja están prohibidas por la ley. Además de estos procedimientos, los demandantes se reservan el derecho de presentar una queja formal ante otros organismos estatales o federales o contratar a un abogado privado para las quejas de presunta discriminación. Se hará todo lo posible para resolver las quejas en el nivel más bajo posible.

- (1) Cualquier persona que cree que ha sido víctima de discriminación por motivos de raza, color, origen nacional o discapacidad puede presentar una queja bajo el Título VI completando y enviando el Formulario de Queja del Título VI de la agencia.
- (2) Las quejas formales deben presentarse dentro de los 180 días calendario a partir de la última fecha de los presuntos actos de discriminación o de la fecha en que la presunta discriminación pasó a ser conocida por el demandante, o donde ha habido un curso continuo de conducta, la fecha en que la conducta fue suspendida o la última instancia de la conducta.
- (3) Las quejas deben presentarse por escrito y ser firmadas por el demandante y deben incluir el nombre, dirección y número de teléfono del demandante. La persona de contacto del Título VI ayudará al demandante a documentar los problemas si es necesario.
- (4) Las denuncias recibidas por fax o e-mail serán reconocidas y procesadas, una vez que la identidad del demandante y la intención de proceder a la denuncia se han establecido. Para ello, es necesario que el demandante envíe por correo un ejemplar original firmado de la transmisión de fax o correo electrónico para que la denuncia sea procesada.
- (5) Las denuncias recibidas por teléfono se reducirán a escrito y serán proporcionadas al demandante para la confirmación o revisión antes del procesamiento. Un formulario de queja será remitido al demandante para que lo complete, firme y devuelva para su procesamiento.
- (6) Una vez presentado, Community Partners, Inc. revisará el formulario de queja para determinar la jurisdicción. Todas las quejas recibirán un acuse de recibo informando si la queja será investigada por Community Partners, Inc. o presentada a la autoridad federal o estatal para recibir orientación.
- (7) Community Partners, Inc. notificará a la Oficina de Derechos Civiles de ADOT TODAS las quejas del Título VI dentro de las 72 horas por teléfono al 602-712-8946; correo electrónico a [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov).

- (8) Community Partners, Inc. tiene 30 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad podrá ponerse en contacto con el demandante. El demandante tiene 15 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de 15 días hábiles, la Autoridad puede cerrar administrativamente el caso. Un caso puede ser administrativamente cerrado también si el demandante ya no quiere seguir adelante con su caso.
- (9) Después que el investigador examine la queja, emitirá una de dos cartas al demandante: una carta de cierre o una carta de búsqueda (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso será cerrado. Una LOF resume las denuncias y las entrevistas sobre el presunto incidente y explica si ocurrirá cualquier acción disciplinaria, formación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene 15 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Un demandante insatisfecho con la decisión de Community Partners, Inc. puede presentar una queja ante las oficinas de derechos civiles del Departamento de Transporte de Arizona (ADOT) o de la Administración Federal de Tránsito (FTA): **ADOT**: ATTN Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) Una copia de estos procedimientos se puede encontrar en línea en: [www.CommunityPartnersInc.org](http://www.CommunityPartnersInc.org)

# Formulario de queja del Título VI

<b>Sección I:</b>		
Nombre:		
Dirección:		
Teléfono (casa):	Teléfono (trabajo):	
Dirección de correo electrónico:		
¿Requisitos de formato accesible?	<input type="checkbox"/> Letras grandes	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
<b>Sección II:</b>		
¿Presenta esta queja en su propio nombre?	<input type="checkbox"/> Sí*	<input type="checkbox"/> No
<i>*Si ha contestado "sí" a esta pregunta, vaya a la <b>Sección III</b>.</i>		
Si no es así, por favor, proporcione el nombre y la relación de la persona para la que está presentando la queja.		
Sírvese explicar por qué se ha interpuesto por un tercero:		
Por favor confirme que ha obtenido la autorización de la parte agraviada si usted está presentando en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
<b>Sección III:</b>		
Creo que la discriminación que he experimentado se basa en (marque todas las que correspondan):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen nacional
<input type="checkbox"/> Discapacidad		
Fecha de la presunta discriminación (mes, día, año): _____		
Explique lo más claramente posible lo que ocurrió y por qué usted cree que fue discriminado. Describa todas las personas involucradas. Incluya el nombre y la información de contacto de la persona que discriminó contra usted (si se conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.		
_____		
_____		
_____		
<b>Sección VI:</b>		
¿Ha presentado previamente una queja del Título VI ante esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No

En caso afirmativo, sírvase proporcionar cualquier información de referencia acerca de su denuncia anterior.

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**Sección V:**

¿Ha presentado esta queja ante cualquier otra agencia local, estatal o federal, o ante cualquier tribunal federal o estatal?

Sí                     No

Si es así, marque todas las opciones que correspondan:

- Agencia Federal: \_\_\_\_\_
- Tribunal federal: \_\_\_\_\_       Agencia estatal: \_\_\_\_\_
- Tribunal estatal: \_\_\_\_\_       Agencia local: \_\_\_\_\_

Sírvase facilitar información acerca de una persona de contacto de la agencia/tribunal donde se formuló la denuncia.

Nombre: \_\_\_\_\_

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

**Sección VI:**

Nombre del organismo contra el cual se hace la denuncia: \_\_\_\_\_

Nombre de la persona contra la cual se hace la denuncia: \_\_\_\_\_

Título: \_\_\_\_\_

Ubicación: \_\_\_\_\_

Número de teléfono (si está disponible): \_\_\_\_\_

Puede adjuntar cualquier material escrito o cualquier otra información que considere relevante para su queja. Su firma y fecha son obligatorias a continuación

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor, presente este formulario en persona en la dirección que aparece a continuación o envíe por correo este formulario a:

Community Partners, Inc., Title VI Coordinator  
4575 E Broadway Blvd  
Tucson, Arizona 85711  
520-325-4268

[Bethanne.enoki@communiytpartnersinc.org](mailto:Bethanne.enoki@communiytpartnersinc.org) Una copia de este formulario se puede encontrar en línea en [www.CommunityPartnersInc.org](http://www.CommunityPartnersInc.org)

# Discrimination 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?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

**Community Partners, Inc.**, had no ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2015**.

*Community Partners,  
Inc.  
Public Participation  
Plan*

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Community Partners, Inc. (CPI), provides transportation only to its assigned program clients; it does not provide transportation to the public at large. Due to this limited scope, CPI does not conduct public meetings or open hearings. Instead, CPI focuses on the areas of the community who are familiar with our target members.

In an effort to educate the community about the programs it operates, CPI conducts presentations to interested organizations and parties in the community. See attached PowerPoint Presentation. The purpose of these presentations is to encourage persons in the community who deal with our client population to consider making referrals to our Assertive Community Treatment (ACT) Teams. The CPI Director, Home and Community Based Services meets, on a recurring basis, with clinicians, administrators, and first responders from the following organizations in Pima County:

- Cenpatico Integrated Care (Regional Behavioral Health Authority)
- Pima County Sheriff's Department Mental Health Support Team (MHST)
- Tucson Police Department Mental Health Support Team (MHST)
- Banner Hospital, Palo Verde Hospital, Sonora Hospital
- Pasadera Behavioral Health Detoxification Clinic
- National Alliance on Mental Illness (NAMI)
- Public Defenders, Pima County Courts, Tucson Fire Department
- Behavioral Health Intake Agencies (CODAC, La Frontera, HOPE, etc.)
- Crisis Response Center (CRC)

Additionally, CPI engages its clients in its program planning to the extent it is able, as well as its marketing and outreach activities. CPI clients will be invited to participate in the process through periodic surveys. As an agency receiving federal financial assistance, Community Partners, Inc. made the following community outreach efforts:

CPI administered a client satisfaction survey in March 2016. Survey results are reviewed and analyzed to improve satisfaction and responsiveness to cultural beliefs/preferences. In the upcoming year CPI will make the following community outreach efforts:

### **Satisfaction Surveys**

- (1) Surveys will be administered twice per year in order for CPI to remain focused on and aware of member needs and preferences. (Sample satisfaction survey attached.)
- (2) Survey results will be reviewed and analyzed by CPI management.

Additionally, CPI employs an Individual and Family Affairs Coordinator who is responsible for the coordination and delivery of planned activities to increase and enhance adult, youth and family involvement and input into the adult and children's system of care. The Coordinator assists with development and implementation of policy, plans, programs, and evaluation methods to strengthen individual, youth and family participation and satisfaction.

# *Community Partners, Inc.*

## *Limited English Proficiency Plan*

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**COMMUNITY PARTNERS, INC. FOUR FACTOR ANALYSIS**

The four factors are as follows:

1. *Demography*: The number and/or proportion of LEPs served and languages spoken in the service area.
2. *Frequency*: Rate of contact with service or program.
3. *Importance*: Nature and importance of program/service to people’s lives.
4. *Resources*: Available resources, including language assistance services varying from limited to wide ranging with varying costs.

The results of the four-factor analysis for this region are as follows:

1. *Demography*: According to the 2010-2014 American Community Survey (ACS) Five-Year Estimates, nearly 29 percent of Pima County’s population speaks a language other than English. ACS reports that 8.31 percent of persons five years old and over speak English less than “very well.” The predominant language for this group is Spanish, at 6.81 percent. The FTA standard is to translate material when five percent or more people in an area speak English less than “very well.”

B16001: LEP	Pima County, Arizona	
	Estimate	Margin of Error
Total:	932,240	+/-106
Spanish or Spanish Creole:	220,737	+/-3,089
Speak English "very well"	157,211	+/-3,161
Speak English less than "very well"	63,526	+/-2,048

2. *Frequency*: Community Partnership Care Coordination (CPCC), as a provider of direct behavioral health services to its referred members, encounter Spanish speaking members much less frequently than the general population of Pima County, however, vital materials are translated into Spanish. Additional translation and interpreter services are offered.

3. *Importance*: Behavioral health services and related transportation are important to the overall health of CPCC’s members. When creating service plans for members, CPCC staff consider the members’ transportation limitations and requirements, particularly to attend vital medical appointments. Inclusive community engagement is critical to ensuring that transportation needs are addressed for its members.

4. *Resources*: Based on the Pima County demographics, CPI has made the decision to translate important CPCC program materials into Spanish. CPI also has several staff who are proficient and certified to translate in Spanish. A statement in Spanish is included in all public outreach notices. Materials in other languages are made available upon request, or upon a noticed need. Under its contracts with the Regional Behavioral Health Authority, CPI is required to provide language assistance to individuals who have limited English proficiency (LEP) and/or other communication needs, such as sign language interpreters, at no charge to AHCCCS-eligible persons and persons determined to have a Serious Mental Illness (SMI) to facilitate timely access to all health care and services. Language assistance services are available to persons with LEP at all points of contact in their preferred language, verbally and/or in

writing. CPCC has a contract with Language Services Associates (LSA) for oral interpretation (written guidelines are also located at the front desk of each site). Only certified staff are to provide oral and/or sign language interpretation services for members. Additionally, Text Telephone (TTY) communication device is used for deaf, hard of hearing or speech-impaired. A TTY is required at both ends in order to communicate by typing messages back and forth.

On the basis of this four-factor analysis, CPCC provides important materials about its programs in Spanish and will translate into other languages upon request.

### **Safe Harbor Provision**

**Community Partners, Inc.** 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. CPI does not provide transportation to the public at large. Vital Documents include the following:

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

**Costs**

CPI contracts with Language Service Associates (LSA) to provide both Video Remote Interpreting (VRI) and Face-to-Face interpreting services to persons with LEP. See LSA rates below. CPI bears the costs of all translation and interpretation services.

<b>Video Remote Interpreting (VRI) – Provided by LSA Video, Inc.</b>	<b>Rate</b>
American Sign Language	3.25 Per Minute
Spoken Spanish	1.99 Per Minute
Other Languages	250 Per Minute
Dedicated Secure Login and Password	Included
Complete Implementation	Included
Real-Time Reporting Tools and Materials	Included
Unlimited INTERPRETRAC License	Included
Utilization Reviews	Included

<b>Face-to-Face Interpreting</b>	<b>Fee Per Hour</b>	<b>Minimum Time Requirement</b>	<b>Fee Per Mile at the Prevailing Federal Rate</b>	<b>After Hours Rate</b>	<b>Travel Billed at 50% the hourly rate</b>
Spanish	\$65.00	2 Hours	\$0.575	\$78.00	\$32.50
Non-Spanish Standard Languages	\$75.00	2 Hours	\$0.575	\$94.00	\$37.50
Rare Languages	\$90.00	2 Hours	\$0.575	\$115.00	\$45.00
American Sign Language (ASL)	\$93.00	2 Hours	\$0.575	\$121.00	\$46.50

# Non-elected Committees Membership Table

A subrecipient 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.

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

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>
<b>Population</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>
<b>TYPE THE NAME OF THE COMMITTEE HERE</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>
<b>TYPE THE NAME OF THE COMMITTEE HERE</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>
<b>TYPE THE NAME OF THE COMMITTEE HERE</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>	<b>TYPE % HERE%</b>

**Describe the process the agency uses to encourage the participation of minorities on such committees should be included**

**X Community Partners, Inc.** does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# **Monitoring for Subrecipient Title VI Compliance**

DESCRIBE HOW YOU MONITOR YOUR SUBRECIPIENTS. This can be through site visits, submissions of Title VI Plans annually, or training and surveys

X **Community Partners, Inc.**, does NOT monitor subrecipients for Title VI compliance.

# Title VI Training

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**DESCRIBE HOW YOUR AGENCY IS TRAINED ON TITLE VI REQUIREMENTS. THIS INCLUDES TITLE VI COORDINATORS, STAFF AND SUBRECIPIENTS. Please list trainings attended in the last year as well as upcoming trainings that will be attended.**

Community Partners, Inc., trains its staff as follows:

Title VI Program Coordinator

- ADOT Title VI General Compliance Requirements
- ADOT Authorized Third-Party Provider Title VI Training Module
- Passenger Service and Safety Training and Certification

All Staff

- ADOT Authorized Third-Party Provider Title-VI Training Module
- Online Passenger Service and Safety Training

Additionally, CPI displays the ADOT Notice to the Public at its reception desks and in its lobbies and break rooms.



# 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.***

Community Partners, Inc., has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed. CPI has no transit-related facilities.

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.

# **Board Approval for the Title VI Program**

Approved by Board on September 21, 2016.

# Organizational Chart

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## EXECUTIVE MANAGEMENT TEAM

