

Title VI Implementation Plan



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Executive Summary

Quality Connections Inc. (QC) as an Arizona not-for-profit 501(c) 3 corporation who's Mission is to provide employment and support services to individuals with disabilities and disadvantages so they can become productive members of our community. QC is organized into four Departments; Residential, Day Program, Employment Services and QCoffice.

Our Residential Department, operates four State Licensed Group Home Settings designed to assist individuals with developmental disabilities in becoming more independent and increase participation in our community.

Our Day Program, provides Montessori-based instruction along with social and recreational activities for adults with disabilities.

Our Employment Services Department, offers individuals with disabilities a chance to become gainfully employed and productive members of our community. QC contracts with the State of Arizona, Department of Economic Security, Division of Developmental Disabilities (DDD), Rehabilitation Services Administration (RSA), Health Choice Integrated Care (HCIC - previously known as NARBHA - Northern Arizona Regional Behavioral Health Authority), and Navajo Nation Vocational Rehabilitation to provide work hardening skills, job development and placement services and supports on the job to assist individuals obtain and maintain employment.

QCoffice is Arizona's only not for profit office supply company. We use our e-commerce site and retail department to provide work hardening skills, gainful employment and training to disabled individuals referred by the Department of Economic Security, DDD, RSA, HCIC, and Navajo Nation Office of Special Education and Rehabilitation.

Quality Connections has been an ADOT Grantee since FY 2014. The transportation program includes daily transportation for individuals with disabilities to access their healthcare, employment, shopping, outings, and other day-to-day activities. Transportation is provided in connection with Employment, Residential, and Day Program services. Each of Quality Connections' departments incorporates daily activities in-house as well as in the community. Our participants are involved in community events, outings, daily errands and activities, volunteer and employment opportunities, and medical and counseling appointments, which require QC to provide or coordinate transportation every week-day, as well as coordinate pick-up and drop-off of 13 QC residents to their homes. Four of the participants of our Day Program require wheelchair equipped vehicles to enable their safe and comfortable journey.

Quality Connections is governed by its Board of Directors. The President & CEO reports directly to the Board of Directors. Vice Presidents report directly to the CEO and oversee their respective departments – one over Residential and Employment Services departments, and one over Day Program, QCoffice, and Administration departments. The Title VI Coordinator position is in the Administration department. Please refer to the Organizational Chart for more information.

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 Quality Connections 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 Quality Connections Inc. sponsored program or activity. There is no distinction between the sources of funding.

Quality Connections 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 Quality Connections Inc. will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Quality Connections Inc. distributes Federal-aid funds to another entity/person, Quality Connections Inc. will ensure all sub-recipients fully comply with Quality Connections Inc. Title VI Nondiscrimination Program requirements. The President & CEO has delegated the authority to Esther Kettles, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Armando Bernasconi – President & CEO

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA Quality Connections Inc.

Quality Connections 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 Quality Connections Inc.

For more information on Quality Connections Inc.'s civil rights program, and the procedures to file a complaint, contact Esther Kettles 928-773-8787; email estherk@qualityconnections.org; or visit our administrative office at 3012 East Route 66, Flagstaff, AZ 86004. For more information, visit www.qualityconnections.org

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

If information is needed in another language, contact 928-773-8787. Para información en Español llame: Armando Bernasconi 928-773-8787

The above notice is posted in the following locations: With other public notices in the hallway near the restrooms at Quality Connections Inc. 3012 East Route 66, Flagstaff, AZ 86004.

This notice is posted online at www.qualityconnections.org

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA Quality Connections Inc.

Quality Connections 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 Quality Connections Inc.'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Esther Kettles 928-773-8787; o visite nuestra oficina administrativa en 3012 E. Route 66, Flagstaff, AZ 86004. Para obtener más información, visite www.qualityconnections.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 the following locations: With other public notices in the hallway near the restrooms at Quality Connections Inc. 3012 East Route 66, Flagstaff, AZ 86004.

This notice is posted online at www.qualityconnections.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 Quality Connections 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. Quality Connections Inc. will conduct an investigation on 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 Quality Connections Inc., including consultants, contractors and vendors.

- (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 Quality Connections Inc. 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 Quality Connections Inc. or submitted to the State or Federal authority for guidance.

- (7) Quality Connections 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.
- (8) Quality Connections 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 10 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 10 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 Quality Connections 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. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA:** Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at: www.qualityconnections.org

If information is needed in another language, contact 928-773-8787. Para información en Español llame: Armando Bernasconi 928-773-8787

Discrimination Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):		Telephone (Work):
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?		<input type="checkbox"/> Yes* <input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		<input type="checkbox"/> Yes <input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		
_____ _____ _____		
Section VI:		
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.

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:
Quality Connections Inc. Title VI Coordinator – Esther Kettles – estherk@qualityconnections.org
3012 East Route 66
Flagstaff, AZ 86004
928-773-8787

A copy of this form can be found online at www.qualityconnections.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?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

Quality Connections Inc. has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2016.

Public Participation Plan

Quality Connections Inc.

Public Participation Plan



Quality Connections is a sub-recipient of the Flagstaff Metropolitan Planning Organization (FMPO). The general public is engaged in its planning and decision-making processes, as well as its marketing and outreach activities through FMPO's Coordinated Mobility Council meetings, which are held quarterly. The public is invited to attend these quarterly meetings to provide their input and feedback. Notice of these meetings is made in advance through the City of Flagstaff's website, publication in the Arizona Daily Sun newspaper, Facebook, and the agenda is posted in many public places throughout the community. A sample agenda is included as an attachment to this plan.

In the past year, Quality Connections Inc. staff have attended and participated in the following FMPO Coordinated Mobility Council meetings:

February 23, 2016 – Attended by Doug Arnett – Quality Connections Inc. Vice President
May 17, 2016 – Attended by Doug Arnett – Quality Connections Inc. Vice President
August 30, 2016 – Attended by Doug Arnett – Quality Connections Inc. Vice President
November 29, 2016 – Attended by Doug Arnett – Quality Connections Inc. Vice President

In the upcoming year Quality Connections Inc. will attend and participate in the following FMPO Coordinated Mobility Council meetings:

March 1, 2017
May 30, 2017
August 29, 2017
November 28, 2017

Limited English Proficiency Plan

Quality Connections Inc.

Limited English Proficiency Plan



Quality Connections Inc. 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 Quality Connections Inc. 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 Quality Connections Inc.'s extent of obligation to provide LEP services, Quality Connections Inc. undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

Persons with Limited English Proficiency (LEP)	Estimate	% of Persons 5 Yrs. & Under	% of Persons 5 Yrs. & Over With LEP
Total Persons 5 years & Over	70,320	6.1%	---
English Speaking Only	57,381	81.6%	---
Limited English Proficiency	549	3.9%	100.0%
Spanish with LEP	320	3.0%	58.2%
Other Indo-European languages with LEP	28	0.2%	5.1%
Asian & Pacific Island languages with LEP	120	0.7%	21.9%
Other Languages with LEP	81	0.0%	14.8%

1. Demography: According to the U.S. Census Bureau, 2010-2014, American Community Survey five year estimates, 2.3% of the Flagstaff area population is considered to be Limited English Proficient. This equates to 549 individuals five years of age or older who report speaking English less than "very well". The predominate language spoken by the LEP population is Spanish. Under the DOJ's Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than "very well".
2. Frequency: The general public comes in contact with Quality Connections on an infrequent basis, but all residents are welcome to attend public meetings of the Flagstaff Metropolitan Planning Organization, to which Quality Connectons belongs as a member agency. To facilitate public participation, FMPO posts public meeting notices in English and Spanish on its website, in public places and in printed media in an effort to reach a large audience.
3. Importance: Quality Connections provides transportation services to adults with disabilities who participate in the residential, employment or day treatment services provided by the agency. Transportation is provided to LEP individuals in these programs to their employment, medical appointments, recreation, and other daily living activities.

4. Resources: Due to fiscal constraints and limited resources at this time, Quality Connections is unable to provide interpretation and translation services without advance notice. Major plans and maps are not available in languages other than English. However, public notices and vital documents and forms are available in English and Spanish.

Quality Connections provides transportation services to individuals with disabilities in connection with other services provided to an individual (such as employment, residential or day treatment services). Quality Connections' provides services through multiple referral agencies that authorize and provide funding for the services provided. Quality Connections' services, including transportation, are not available to the general public without authorization from a referral agency.

LEP individuals or others who may need language assistance are identified by the referral agency. If an individual with LEP requests information or is interested in receiving services from Quality Connections, Quality Connections will collaborate with the referral agency on a case by case basis to provide information in a language or format that the individual will understand.

Safe Harbor Provision

Quality Connections 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 to the Public
- (2) Non Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

Non-elected Committees Membership Table

Quality Connections Inc. does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

- Quality Connections Inc. does NOT monitor subrecipients for Title VI compliance.

Title VI Training

Quality Connections staff receive training on Title VI and ADOT 5310 programs. Training information is then shared internally with other staff within Quality Connections. All staff with driving responsibilities receive training when hired on the agency's Transportation Policy and Procedures, including Title VI and Limited English Proficiency. This training is renewed every three years. The following trainings related to Title VI and ADOT 5310 programs have been attended:

- October 8, 2015 – Grant Management for 5310 Programs – presented by SEAGO / NACOG
Attended by Doug Arnett – Quality Connections Inc. Vice President
- November 10, 2015 – Data Collection for 5310 Transit Providers – presented by SEAGO / NACOG
Attended by Doug Arnett – Quality Connections Inc. Vice President
- February 29, 2016 – 5310 Grant Workshop (including Title VI Training) – presented by ADOT staff
Attended by Doug Arnett – Quality Connections Inc. Vice President
- July 28, 2016 – Grant Management (Fleet Acquisition and Management Guidelines)
Attended by Doug Arnett – Quality Connections Inc. Vice President
- August 25, 2016 – True Cost of Transit - presented by SEAGO / NACOG
Attended by Doug Arnett – Quality Connections Inc. Vice President
- September 20, 2016 – Compliance - presented by SEAGO / NACOG
Attended by Doug Arnett – Quality Connections Inc. Vice President

A full calendar of upcoming trainings is not yet available, but Quality Connections staff will attend all trainings relevant to Title VI and ADOT 5310 programs.

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.

Quality Connections Inc. has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since Quality Connections Inc was founded in 1999.

Board Approval for the Title VI Program

The Board of Directors of Quality Connections Inc. approved this Title VI Implementation Plan on September 13, 2017.