

# Title VI Plan Cover Page

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## Quality Connections 2025

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# Executive Summary

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Quality Connections (QC) is an Arizona not-for-profit 501(c) 3 corporation whose 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 six Departments: Group Homes, Day Programs, In-Home Services, Employment Services, Evergreen Academy Preschool and QC Office. Evergreen Academy Preschool is in Flagstaff only, and all other programs serve both Flagstaff and Page, including surrounding communities.

Quality Connections' Group Home Department operates fourteen State Licensed Group Home Settings are designed to assist individuals with developmental disabilities in becoming more independent and increase participation in community life. Our Day Programs provide social and recreational activities for adults with disabilities. In-Home services provide critical services for individuals with disabilities in their own homes.

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), Navajo Nation Vocational Rehabilitation and Behavioral Health plans to provide work hardening skills, job development and placement services and supports on the job to assist individuals obtain and maintain employment.

QC Office 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, Navajo Nation Office of Special Education and Rehabilitation, and Behavioral Health.

Quality Connections has been an ADOT 5310 Grantee for its Flagstaff programs since FY 2014. Our 5310 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. Participants are involved in community events, outings, daily errands and activities, volunteer and employment opportunities, and medical and counseling appointments, all of which require QC to provide or coordinate transportation each day. More than 10 of our Day Programs participants require wheelchair-equipped vehicles to enable their safe and comfortable journey.

In January 2025, Quality Connections assumed operation of the Group Homes and Day Program in Page, Arizona that were previously operated by Helping Hands Agency, and is currently in the process of transitioning the Helping Hands EXPRESS 5311 program which serves Page, Kaibeto, Tuba City and nearby communities. The EXPRESS 5311 program provides regional transportation and is available to all members of the general public.

Quality Connections is governed by its Board of Directors. The CEO reports directly to the Board of Directors. Officers and Directors report directly to the CEO and oversee their respective 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? (Check all that apply)**

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

**Is your agency receiving direct funds from FTA?**

- ☐ If yes, please attach a copy of your FTA letter of approval of Title VI Plan.
- ☒ No

# Non Discrimination Notice to the Public

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

**Quality Connections** 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**.

For more information on the **Quality Connections'** civil rights program, and the procedures to file a complaint, contact **Esther Kettles, HR Director, (928) 773-8787, (TTY N/A); email [estherk@qualityconnections.org](mailto:estherk@qualityconnections.org)**; or visit our administrative office at **3012 E. Route 66, Flagstaff, AZ 86004**. For more information, visit **[www.qualityconnections.org](http://www.qualityconnections.org)**.

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 1801 W. Jefferson St. MD 154A Suite 100 Phoenix AZ, 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **(928) 773-8787**.

\*Para información en Español llame: **Armando Bernasconi (928) 773-8787**

\*T'áá shí éí navajo naaltsoos: **Christine Yellowhair (928) 645-9596**

The above notice is posted in the following locations:

- **With other public notices in the hallway near the restrooms at Quality Connections 3012 East Route 66, Flagstaff, AZ 86004.**
- **With other public notices in the hallway near the supply closet at Quality Connections 35<sup>6th</sup> Ave., Page, AZ 86040.**

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

# Non Discrimination Notice to the Public - Spanish

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

**Quality Connections** (y sus subcontratistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **Quality Connections**, y los procedimientos para presentar una queja, contacte **Esther Kettles, HR Director (928) 773-8787, (TTY N/A)**; o visite nuestra oficina administrativa en **3012 E. Route 66, Flagstaff, AZ 86004**. Para obtener más información, visite **[www.qualityconnections.org](http://www.qualityconnections.org)**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 1801 W. Jefferson St. MD 154A Suite 100 Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations:

- **With other public notices in the hallway near the restrooms at Quality Connections 3012 East Route 66, Flagstaff, AZ 86004.**
- **With other public notices in the hallway near the supply closet at Quality Connections 35 6<sup>th</sup> Ave., Page, AZ 86040.**

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

# Non Discrimination Notice to the Public - Navajo

## Díízhzhinígíí Nihá hasht'íí dóó Náhookǫ́qh T'áálahoodzoo Title VI dóó ADA. Quality Connections

**Quality Connections** jiik'ehgo áyóó anííli, dakííli, naaltsoos hólq holne' doo yá'át'éél nihíji' t'áá'í hólq 1964 ni'deesh'niih na't'ee' 504 asdzáá hólq a'níínígíí 1973 hólq doo nihinaalnigíí Ádádá doo 1990 (ADA). Níniih na'át'éehgo t'áá shikaadéél nízghi, nihik'ehgo t'áá' ajiíli' hólq áyóó ádád'í hólq t'áá' ákót'éego ch'ííji' Quality Connections.

Áłk'idzii nitsíkees yéégó **Quality Connections'** naa iiná, dóó da yáhoot'ééli t'áá ajiíli, kontakti **Esther Kettles, HR Director (928) 773-8787, (TTY N/A);** email [estherk@qualityconnections.org](mailto:estherk@qualityconnections.org); dóó bits'áhoot'ééli **3012 E. Route 66, Flagstaff, AZ 86004.** Áłk'idzii nitsíkees, bitséé' [www.qualityconnections.org](http://www.qualityconnections.org)

Dínégo ákót'ééli yáhoot'ééli éí Arizona Department of Transportation (ADOT) Civil Rights Office. ATTN: Title VI Program Coordinator 1801 W. Jefferson St. MD 154A Suite 100 Phoenix AZ, 85007 dóó Federal Transit Administration (FTA). ATTN: Title VI Program Coordinator, 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 3012 East Route 66, Flagstaff, AZ 86004.**
- **With other public notices in the hallway near the supply closet at Quality Connections 35 6<sup>th</sup> Ave., Page, AZ 86040.**

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

# Non Discrimination ADA/Title VI Complaint Procedures

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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** 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 **Quality Connections** 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 **Quality Connections** or submitted to the State or Federal authority for guidance.



- (7) **Quality Connections** 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) **Quality Connections** has 5 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 5 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 5 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 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** 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.qualityconnections.org](http://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 ADA/Title VI 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.		
<b>Section V:</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency:		
<input type="checkbox"/> Federal Court:	<input type="checkbox"/> State Agency:	
<input type="checkbox"/> State Court:	<input type="checkbox"/> Local Agency:	
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
<b>Section VI:</b>		
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**

**Esther Kettles, HR Director**

**3012 E. Route 66, Flagstaff, AZ 86004**

**(928) 773-8787 [estherk@qualityconnections.org](mailto:estherk@qualityconnections.org)**

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

# Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

☒ **Quality Connections** has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2024**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
<b>Investigations</b>						
1)						
2)						
<b>Lawsuits</b>						
1)						
2)						
<b>Complaints</b>						
1)						
2)						

# Public Participation Plan

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**Quality Connections** will engage 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, surveys, or other means of engagement.

**Quality Connections** is currently in the process of transitioning existing services that are currently being provided by **Helping Hands Agency**. As an agency receiving federal financial assistance, **Helping Hands Agency** made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.

- ☒ Expanded the distribution of agency brochures
  - ☒ Posted the Nondiscrimination Public Notices to the following locations:
    - ☒ Lobby of agency
  - ☒ List other: Helping Hands Agency solicited public participation through regular public meetings, and rider surveys administered approximately twice per year. Additionally, Helping Hands Agency formed a Transit Advisory Committee (TAC) that included representatives from riders, the marina, Page business owner(s), Page Mayor and/or City Council members, Navajo Nation, and AZ Department of Economic Security.
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**Quality Connections** will make the following community outreach efforts for the **upcoming year**:

- ☒ List other: In the upcoming year Quality Connections will continue the public participation efforts begun by Helping Hands Agency, including distribution of rider guides and agency brochures, posting nondiscrimination notices, and holding public meetings. Additionally, Quality Connections will establish a new Transit Advisory Committee (TAC) recruiting members from the community including representatives from riders, the marina, Page business owner(s), Page Mayor and/or City Council members, AZ Department of Economic Security, and increased outreach to Navajo Nation Chapter Houses in areas served by the program.
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# Limited English Proficiency Plan

**Quality Connections** 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** 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 **Quality Connections'** extent of obligation to provide LEP services, the **Quality Connections** 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 **Quality Connections** service area who may be served or likely to encounter by **Quality Connections** program, activities, or services.

Flagstaff, AZ Metro Area								
	Total		Percent		Limited English-speaking households		Percent limited English-speaking households	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
All households	62,136	±1,998	(X)	(X)	899	±499	1.4%	±0.8
Households speaking --								
English only	53,878	±2,725	86.7%	±3.2	(X)	(X)	(X)	(X)
Spanish	4,106	±1,374	6.6%	±2.2	433	±304	10.5%	±8.0
Other languages	4,152	±1,387	6.7%	±2.2	466	±392	11.2%	±9.2

Page, AZ Metro Area						
	Total		Percent	Limited English-speaking households		Percent limited English-speaking households
Label	Estimate	Margin of Error	Estimate	Estimate	Margin of Error	Estimate
All households	6,850	±216	(X)	218	±592	3.1%
Households speaking --						
English only	5,460	±429	79.7%	(X)	(X)	(X)
Spanish	392	±278	6.6%	142	±137	2.0%
Navajo	858	±244	12.5%	76	±63	1.1%
Other languages	140	±194	2.0%	0	±392	0%

- 2) The frequency with which LEP individuals come in contact with a **Quality Connections** services.

**Quality Connections'** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2024** . **Quality Connections** averages **0** contacts per **year**. One LEP individual has been employed by Quality Connections, but he does not have a need to use Quality Connections' transportation services. Quality Connections has internal staff able to provide translation services in Spanish and Navajo.

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

Quality Connections' current 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, Group Home, In-Home Services 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. Quality Connections' programs are vital to the economic, social, and medical well-being of the individuals with disabilities served by the organization.

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

**Quality Connections** provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

#### **Safe Harbor Provision for written translations**

**Quality Connections** complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish and Navajo languages. With respect to Title VI information, the following shall be made available in Spanish and Navajo:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials

- 1) **Quality Connections** provides language assistance services through the below methods:

- ☒ Instructions are provided to customer service staff and other **Quality Connections** staff who regularly take phone calls from the general public on how to respond to an LEP caller.

2) **Quality Connections** has a process to ensure the competency of interpreters and translation service through the following methods:

**Quality Connections** will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language. **Quality Connections** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **Quality Connections** will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreter or translator. **Quality Connections** will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

3) **Quality Connections** provides notice to LEP persons about the availability of language assistance through the following methods:

- ☒ Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services

4) **Quality Connections** monitors, evaluates and updates the LEP plan through the following process:

**Quality Connections** will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. **Quality Connections** will make changes to the language assistance plan based on feedback received. **Quality Connections** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **Quality Connections** may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. **Quality Connections** will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons and will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5) **Quality Connections** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **Quality Connections** will implement processes for training of staff through the following procedures:

**Quality Connections** will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. **Quality Connections** will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. **Quality Connections** will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. **Quality Connections** will implement LEP training to be provided for agency staff. **Quality Connections** staff training for LEP to include:

- A summary of the **Quality Connections** responsibilities under the DOT LEP Guidance;



- A summary of the **Quality Connections** language assistance plan;
- A summary of the number and proportion of LEP persons in the **Quality Connections** service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the **Quality Connections** cultural sensitivity policies and practices.

# Non-elected Committees Membership Table

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Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

☒ **Quality Connections** does not select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Subrecipient Title VI Compliance

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Describe how you monitor your subrecipients. This can be through site visits, submissions of Title VI Plans annually, or training and surveys.

☒ **Quality Connections** does not monitor subrecipients for Title VI compliance.

# Title VI Equity Analysis

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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** has no current or anticipated plans to develop new transit facilities covered by these requirements

# Fixed Route Transit Provider Analysis

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Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

☒ **Quality Connections** is not a Fixed Route Transit Provider

# Board Approval for the Title VI Plan

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The Board of Directors of Quality Connections reviewed and approved a previous version of this Title VI Plan on March 4, 2025, and will review again after the plan receives final approval from ADOT's Civil Rights Office.