



**Title VI Implementation Plan:  
FTA 5310 Accessibility Van Grant – FY 2022**

*Terros Health*

*Implementation Date: 10/30/2022 – 10/30/2025*

11/5/2022

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## Policy Statement

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

Terros Health also ensures 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, Terros Health will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Terros Health distributes Federal-aid funds to another entity/person through the FTA 5310 Accessibility Van Grant, Terros Health will ensure all sub-recipients fully comply with Terros Health Title VI Nondiscrimination Program requirements.

The President and Chief Executive Officer has delegated the authority to the Patient Advocate (Title VI Program Coordinator) to oversee and implement FTA Title VI requirements.

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Karen Hoffman Tepper, Ph.D, President and CEO

## Title VI Notice to the Public

### Notifying the Public of Rights Under Title VI Regarding the 5310 Accessible Vans **Terros Health**

The Terros Health operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI with regards to the 5310 Accessible Vans may file a complaint with Terros Health.

For more information on the Terros Health's civil rights program, and the procedures to file a complaint, contact Patient Advocate (Title VI Program Coordinator), 602.389.3734; email [QOC@TerrosHealth.org](mailto:QOC@TerrosHealth.org); or visit our administrative office at 3003 N Central Ave, Suite 400, Phoenix, AZ 85012. For more information, visit [www.terroshealth.org](http://www.terroshealth.org).

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **City of Phoenix Public Transit Department**: ATTN: Title VI Coordinator, 302 N. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 **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 602.685.6000. Para información en Español llame: 602.685.6000

## Título VI Aviso al Público - Español

### Aviso al Público Sobre los Derechos Bajo el Título VI Respecto a las Furgonetas Accesibles 5310 **Terros Health**

Terros Health asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964 xib ewaowxri con respecto a las furgonetas accesibles 5310. El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la Terros Health's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Patient Advocate (Title VI Program Coordinator), 602.389.3734; email [QOC@TerrosHealth.org](mailto:QOC@TerrosHealth.org); o visite nuestra oficina administrativa en 3003 N Central Ave, Suite 400, Phoenix, AZ 85012. Para obtener más información, visite [www.terroshealth.org](http://www.terroshealth.org).

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

The above notices are posted:

- Online at [www.terroshealth.org](http://www.terroshealth.org)
- Inside the 5310 transit vehicles
- In the lobby at the Terros Health McDowell Health Center

## Complaint Procedures and Forms

Terros Health's Procedure 5204.2 states:

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to the Terros Health 5310 Accessible Van Grant. 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 they has been discriminated against on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the 5310 Accessible Van Grant 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 Patient Advocate 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 them to complete, sign and return for processing.
6. Once submitted, Terros Health will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by Terros Health or submitted to the State or Federal authority (the Authority) for guidance.
7. Terros Health will notify the Title VI Coordinator of all Title VI complaints within 72 hours via telephone at: 602-262-7242; email to: [phxtransiteo@phoenix.gov](mailto:phxtransiteo@phoenix.gov).
8. Terros Health has sixty (60) days to investigate the complaint.
9. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has sixty (60) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within thirty (30) business days, the Authority can

administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

10. After the investigator reviews the complaint, they will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of a workforce member, or other action will occur. If the complainant wishes to appeal the decision, they have thirty (30) days after the date of the letter or the LOF to do so.
11. A complainant dissatisfied with Terros Health's decision may file a complaint directly with the **City of Phoenix Public Transit Department (COP)**: Attention: Title VI Coordinator, 302 N. 1<sup>st</sup> Ave., Suite 900, Phoenix, AZ 85003 or the **Federal Transit Administration (FTA)** offices of Civil Rights: 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 may be found online at: [www.terroshealth.org/TitleVI](http://www.terroshealth.org/TitleVI).

## Title VI Complaint Form Regarding the 5310 Accessible Vans

<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 with regards to the 5310 Accessible Vans was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
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.		
<hr/> <hr/>		
<b>Section VI:</b>		
Have you previously filed a Title VI 5310 Accessible Van 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

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Signature

Date

Please submit this form in person at the address below, or mail this form to:

Terros Health, Patient Advocate (Title VI Program Coordinator)

3003 N Central Ave, Suite 400

Phoenix, AZ 85012

Phone: 602-389-3734

Email: [QOC@terroshealth.org](mailto:QOC@terroshealth.org)

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

## Procedimientos y Formularios de Quejas

El Procedimiento 5204.2 de Terros Health establece:

Estos procedimientos brindan orientación para todas las quejas presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964, en lo que se refiere a Terros Health 5310 Accesible Van Grant. La intimidación o las represalias como resultado de una denuncia están prohibidas por ley. Además de estos procedimientos, los denunciantes se reservan el derecho de presentar una denuncia formal ante otras agencias estatales o federales o de buscar un abogado privado para las denuncias que aleguen discriminación. Se hará todo lo posible para resolver las quejas al nivel más bajo posible.

1. Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional puede presentar una queja del Título VI completando y enviando el Formulario de queja del Título VI 5310 Accesible Van Grant.
2. Las quejas formales deben presentarse dentro de los 180 días calendario a partir de la última fecha del presunto acto de discriminación o la fecha en que la presunta discriminación fue conocida por el(los) denunciante(s), o cuando ha habido un curso continuo de conducta, la fecha en que la conducta fue descontinuada o la última instancia de la conducta.
3. Las quejas deben presentarse por escrito y estar firmadas por los denunciantes y deben incluir el nombre, la dirección y el número de teléfono de los denunciantes. El Defensor del Paciente ayudará al denunciante a documentar los problemas si es necesario.
4. Las denuncias recibidas por fax o correo electrónico serán reconocidas y procesadas, una vez que se haya establecido la identidad de los denunciantes y la intención de proceder con la denuncia. Para esto, el denunciante debe enviar por correo una copia original firmada del envío por fax o correo electrónico para que se procese la denuncia.
5. Las denuncias recibidas por teléfono se reducirán a escrito y se entregarán al denunciante para su confirmación o revisión antes de procesarlas. Se enviará un formulario de queja al denunciante para que lo complete, lo firme y lo devuelva para su procesamiento.
6. Una vez presentado, Terros Health revisará el formulario de queja para determinar la jurisdicción. Todas las quejas recibirán una carta de acuse de recibo informando al denunciante si Terros Health investigará la queja o si la enviará a la autoridad estatal o federal (la Autoridad) para recibir orientación.
7. Terros Health notificará al Coordinador del Título VI de todas las quejas del Título VI dentro de las 72 horas por teléfono al: 602-262-7242; envíe un correo electrónico a: [phxtransiteo@phoenix.gov](mailto:phxtransiteo@phoenix.gov).

8. Terros Health tiene sesenta (60) días para investigar la denuncia.

9. Si se necesita más información para resolver el caso, la Autoridad podrá comunicarse con el denunciante. El denunciante tiene sesenta (60) días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el denunciante o no recibe la información adicional dentro de los treinta (30) días hábiles, la Autoridad puede cerrar administrativamente el caso. Un caso puede cerrarse administrativamente también si el denunciante ya no desea continuar con su caso.

10. Después de que el investigador revise la denuncia, emitirá una de dos cartas al denunciante: una carta de cierre o una Carta de conclusión (LOF). Una carta de cierre resume las alegaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Una LOF resume las alegaciones y las entrevistas con respecto al presunto incidente y explica si se tomará alguna medida disciplinaria, capacitación adicional de un miembro del personal u otra acción. Si el denunciante desea apelar la decisión, tiene treinta (30) días a partir de la fecha de la carta o LOF para hacerlo.

11. Un reclamante insatisfecho con la decisión de Terros Health puede presentar una queja directamente con **el Departamento de Transporte Público de la Ciudad de Phoenix**: Atención: Coordinador del Título VI, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003 o **Federal Transit Oficinas de la Administración de Derechos Civiles**: Atención, Coordinador del Programa del Título VI, Edificio Este, 5<sup>th</sup> Piso-TCR 1200 New Jersey Ave., SE Washington DC 20590

12. Puede encontrar una copia de estos procedimientos en línea en: [www.terroshealth.org/TitleVI](http://www.terroshealth.org/TitleVI).

**Title VI Complaint Form Regarding the 5310 Accessible Vans – Spanish**

**Forma Para Poner una Queja  
(De Acuerdo Al Título VI)  
Respecto a las Furgonetas Accesibles 5310**

*Nota: La siguiente información se necesita para procesar su queja.*

**Información de la persona que está poniendo la queja:**

Nombre: Dirección: \_\_\_\_\_  
Ciudad/Estado/Código Postal: \_\_\_\_\_  
Teléfono(Casa): \_\_\_\_\_  
Teléfono (Trabajo): \_\_\_\_\_

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

Nombre: Dirección: \_\_\_\_\_  
Ciudad/Estado/Código Postal: \_\_\_\_\_  
Teléfono (Casa): \_\_\_\_\_  
Teléfono (Trabajo): \_\_\_\_\_

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

Raza/Color (Especifique) \_\_\_\_\_ Nacionalidad (Especifique) \_\_\_\_\_

**¿En qué fecha(s) sucedió la discriminación?** \_\_\_\_\_

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

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

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

Agencia Federal \_\_\_\_\_ Corte Estatal \_\_\_\_\_ Corte Federal \_\_\_\_\_  
Agencia Local \_\_\_\_\_ Agencia Estatal \_\_\_\_\_

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

Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad/Estado/Código Postal: \_\_\_\_\_  
Teléfono(Casa): \_\_\_\_\_  
Teléfono (Trabajo): \_\_\_\_\_

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

\_\_\_\_\_  
Firma de la Persona que presenta la queja

\_\_\_\_\_  
Fecha

**Número de Anexos:** \_\_\_\_\_

Someta la forma y cualquier información adicional a:

Terros Health, Patient Advocate (Title VI Program Coordinator)  
3003 N Central Ave, Suite 400  
Phoenix, AZ 85012  
Teléfono: 602-389-3734

Correo electrónico: [QOC@TerrosHealth.org](mailto:QOC@TerrosHealth.org)

Puede encontrar una copia de este formulario en línea en [www.terroshealth.org](http://www.terroshealth.org).

## Title VI Investigations, Complaints and Lawsuits Pertaining to the 5310 Accessibility Van Grant

Terros Health will submit the required Annual Title VI Report to the City of Phoenix on or before October 15th of each year. If no investigations, lawsuits, or complaints were filed, a blank form may 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)				

Terros Health has not had any Title VI complaints, investigations, or lawsuits since 10/30/2019.

## Public Participation Plan

Terros Health is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, Terros Health has in previously years made the following community outreach efforts:

- *Patient Outreach Mailing Campaign*
- *Individual or Group Counseling Session Announcement*
- *Patient Surveys*

In the upcoming year Terros Health will make the following community outreach efforts:

- *Annual Patient Surveys*
- *Monthly Individual or Group Counseling Session Announcement*

### **Public Meetings:**

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

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

(3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

Terros Health submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

### **Limited English Proficiency Plan**

Terros Health has chosen to adopt the City of Phoenix/Valley Metro Language Assistance Plan Title VI Program, which was last updated in 2021, and which explicitly describes the proactive strategies, procedures, and desired outcomes to ensure meaningful access to benefits, services, information, and other important portions of programs and activities for individuals who are Limited-English Proficient (LEP).

### **Non-elected Committees Membership**

This is not applicable because Terros Health does not select the membership of any transit-related, non-elected committees, planning boards, or advisory councils.

### **Monitoring for Sub-Recipient Title VI Compliance**

This is not applicable because Terros Health does not have subrecipients.

### **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.

This is not applicable because Terros Health does not plan to acquire land to construct storage facilities, maintenance facilities or operation centers.

## Board Approval for the Title VI Program for the 5310 Van Grant

Terros Health’s Board of Directors met on February 28<sup>th</sup>, 2023, and adopted this three-year program. The resolution is recorded in the Board minutes. Required procedures, notices and forms are posted as required.

Subsequent periodic reviews are recorded on the Revision Index below and documented in the associated Board minutes.

### Revision Index

Date	Approval Authority	Revisions
9/15/2022	Executive Leadership Committee (ELT) and Saffron Carew, CIO	Updated Title VI Plan for 2022-2025. Address feedback from City of Phoenix.
10/30/2019	Terros Health Board of Directors	Initial approval of the Title VI Implementation Plan.
11/5/2020	Executive Leadership Committee (ELT) and Saffron Wanger, CIO	Updated to Terros Health agency plan format and included verbiage throughout the plan and associated forms clarifying the plan pertains to the FTA 5310 Accessibility Van Grant. Updated Patient Advocate’s phone number. Board approval of these procedural changes is not required.
2/28/2023	Terros Health Board of Directors	Approval of Title VI Implementation Plan.