
Title VI Implementation Plan



September 24, 2026 – September 23, 2029

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Title VI Policy Statement

The Aster Aging, Inc. (“Aster”) policy assures full compliance with Title VI of the Civil Rights Act of 1964 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 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any Aster sponsored program or activity. There is no distinction between the sources of funding.

Aster 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.

When Aster distributes Federal-aid funds to another entity/person, Aster will ensure all subrecipients fully comply with Aster’s Title VI Nondiscrimination Program requirements. The CEO has delegated the authority to Patty Webster, Human Resources Associate, as Title VI Program Coordinator, to oversee and implement FTA Title VI requirements



Deborah B Schaus, CEO
Aster Aging, Inc.

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Aster Aging, Inc.

Aster Aging, Inc. ("Aster") 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 may file a complaint with Aster.

For more information on Aster's civil rights program, and the procedures to file a complaint, contact Aster's Human Resources Associate, 480-964-9014 (TTY number 800-842-4681); email: HR@asteraz.org or visit our administrative office at 45 W. University Drive, Mesa, AZ 85201. For more information, visit www.asteraz.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. 1st 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

If information is needed in another language, contact the Aster's Human Resources Associate at 480-964-9014. Para información en Español llame: Human Resources Associate at 480-964-9014

The above notice is posted in the following locations: Mesa Downtown Senior Center, 247 N. Macdonald Street, Mesa, Arizona; Red Mountain Senior Center, 7550 E. Adobe Street, Mesa, Arizona; and, in Aster's FTA 5310 funded vehicles.

This notice is posted online at www.asteraz.org

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Aster Aging, Inc

Aster Aging, Inc. (y sus subcontratistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964. 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 Aster Aging Inc.'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Human Resources Associate, 480-964-9014, (TTY 800-842-4681); correo electrónico HR@asteraz.org; o visite nuestra oficina administrativa en 45 W University Dr., Ste A, Mesa, AZ 85201. Para obtener más información, visite www.asteraz.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. 1st 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 notice is posted in the following locations: Mesa Downtown Senior Center, 247 N. Macdonald Street, Mesa, Arizona; Red Mountain Senior Center, 7550 E. Adobe Street, Mesa, Arizona; and, in Aster's FTA 5310 funded vehicles.

This notice is posted online at www.asteraz.org

Title VI Complaint Procedures – Aster Aging

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to any program or activity that is administered by Aster Aging 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, or national origin may file a Title VI 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 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 Aster Aging 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 Aster Aging or submitted to the State or Federal authority for guidance.
- (7) Aster Aging 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.

- (8) Aster Aging has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 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 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.
- (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 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 the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with Aster Aging's decision may file a complaint directly with the City of Phoenix Public Transit Department (COP): Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, or the Federal Transit Administration (FTA) offices of Civil Rights: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: www.asteraz.org

Procedimientos de Quejas Bajo el Título VI

Estos procedimientos proporcionan orientación para todas las quejas presentadas bajo el Título VI del Decreto de los Derechos Civiles de 1964, en lo que se refieren a cualquier programa o actividad que sea administrado por la Aster Aging, incluyendo a los asesores, contratistas y proveedores. Por ley, se prohíbe la intimidación o las represalias como resultado de una queja. Además de estos procedimientos, los reclamantes se reservan el derecho de presentar una queja formal ante otras agencias estatales o federales o de solicitar asesoría privada para quejas alegando 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 bajo el Título VI completando y presentando la Forma de Quejas del Título VI de la agencia.
- (2) Las quejas formales se deben presentar dentro de 180 días de calendario de la última fecha del supuesto acto de discriminación o de la fecha en la que el/los reclamante/s se haya/n enterado de la supuesta discriminación, o cuando haya habido un curso de conducta continuo, la fecha en la que la conducta haya sido suspendida o la última ocasión en la cual ocurrió la conducta.
- (3) Las quejas se deben hacer por escrito y deben ser firmadas por el/los reclamante/s y deben incluir el nombre, el domicilio y el número de teléfono del/los reclamante/s. Si es necesario, la persona de contacto del Título VI ayudará al/la reclamante a documentar las cuestiones.
- (4) Las alegaciones recibidas por fax o por correo electrónico serán admitidas y procesadas, una vez que se haya establecido la identidad del/la reclamante y la intención de proceder con la/s queja/a. Para ello, se requiere que el/la reclamante envíe por correo postal una copia original firmada del fax o de la transmisión de la nota electrónica para que la queja sea procesada.
- (5) Las alegaciones recibidas por teléfono se reducirán a un formato por escrito y se les proveerán al/la reclamante para su confirmación o revisión antes de su procesamiento. Se remitirá una forma de la queja al/la reclamante para que la complete, la firme y la devuelva para su procesamiento.
- (6) Una vez presentada, la Aster Aging revisará la forma de la queja para determinar la jurisdicción. Todas las quejas recibirán una carta de reconocimiento informándole si la queja será investigada por la Aster Aging o presentada a la autoridad estatal o federal para recibir su orientación.
- (7) La Aster Aging le notificará al Coordinador del Título VI sobre todas las quejas del Título VI dentro de 72 horas por teléfono llamando al: 602-262-7242; por correo electrónico escribiendo a: phxtransiteo@phoenix.gov

- (8) La Aster Aging tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el/la reclamante. El/la reclamante tiene 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/la reclamante o no recibe la información adicional dentro de los 30 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso también se puede cerrar administrativamente si el/la reclamante ya no desea seguir adelante con su caso.
- (9) Después de que el investigador revise la queja, emitirá una de dos cartas al/la reclamante: una carta de cierre o una carta de hallazgo “Letter of Finding” (LOF). Una carta de cierre resume los alegatos y afirma que no hubo una infracción con respecto al Título VI y que el caso se cerrará. Una carta LOF resume las alegaciones y las entrevistas con respecto al supuesto incidente, y explica si se llevará a cabo alguna acción disciplinaria, capacitación adicional del/la miembro del personal u otra acción. Si el/la reclamante desea apelar a la decisión, tiene 30 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Un/a reclamante insatisfecho/a con la decisión de la Aster Aging puede presentar una queja directamente con el Departamento de Transporte Público de la Ciudad de Phoenix: City of Phoenix Public Transit Department (COP), Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, ó con las oficinas de Derechos Civiles de la Administración Federal de Transporte: Federal Transit Administration (FTA), Offices of Civil Rights, Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) Una copia de estos procedimientos se puede encontrar en línea en: www.asteraz.org

Title VI Complaint Form

Any person who believes that he or she has been discriminated against by Aster Aging, Inc. ("Aster") or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Aster.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. For more information contact us at 480-964-9014 (TTY: 711) or via email at HR@asteraz.org.

SECTION 1: CUSTOMER INFORMATION

First Name: _____ Last Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Home Phone: _____ Cell Phone: _____
Email: _____ Preferred method of contact: ☐ Phone ☐ Email

SECTION 2: INCIDENT INFORMATION

Date of Incident: _____ Time of Incident: _____ ☐ AM ☐ PM City: _____
Incident Location: _____ Direction of Travel: _____
Route #: _____ Bus/Light Rail/Streetcar #: _____
Service Type: ☐ Local Bus ☐ Express/RAPID ☐ Circulator/Connector ☐ Light Rail ☐ Streetcar ☐ Dial-a-Ride
Operator Name: _____
Operator Description: _____
What was the discrimination based on (Check all that apply): ☐ Race ☐ Color ☐ National Origin ☐ Other _____

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? ☐ Yes ☐ No

If yes, please provide information about a contact person at the FTA where the complaint was filed:

Name: _____ Title: _____
Address: _____ Phone: _____

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No

Signature and date required below:

Signature _____
Date _____

FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Aster Aging, Inc. ("Aster") o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 480-964-9014 (TTY: 711) o por correo electrónico a HR@asteraz.org.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre: _____ Apellido: _____
Domicilio: _____
Ciudad: _____ Estado: _____ Código Postal: _____
Teléfono del Hogar: _____ Teléfono Celular: _____
Correo Electrónico: _____ Método preferido de contacto: ☐ Teléfono ☐ Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente: _____ Hora del Incidente: _____ ☐ AM ☐ PM Ciudad: _____
Ubicación del Incidente: _____ Dirección del Viaje: _____
Ruta #: _____ Autobús/Tren Ligero/Tranvía #: _____
Tipo de Servicio: ☐ Autobús Local ☒ Express/RAPID ☐ Circulador/Conector ☐ Tren Ligero ☐ Tranvía ☐ Dial-a-Ride Nombre del/la Operador/a: _____
Descripción del/la Operador/a: _____
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable):
☐ Raza ☐ Color ☐ Origen Nacional ☐ Otro _____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? ☐ Sí ☐ No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre: _____ Título: _____
Domicilio: _____ Teléfono: _____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? ☐ Sí ☐ No Firma y fecha requeridas abajo:

Firma _____
Fecha _____

Title VI Investigations, Complaints, and Lawsuits

A separate Annual Title VI Report must be submitted each year by October 15th as a part of the Milestone Progress Reporting (MPR) data.

<i>Name and/or Case Number</i>	<i>Date Case Filed (Month, Day, Year)</i>	<i>Case Summary (include basis of complaint: ex. race, color, national origin)</i>	<i>Case Status/ Response</i>	<i>Case Resolution Action</i>
Investigations				
Lawsuits				
Complaints				

- ✓ Aster Aging, Inc. has not had any Title VI complaints, investigations, or lawsuits during the review period September 28, 2023 – September 24, 2026.

Aster Aging, Inc. Public Participation Plan



Aster Aging, Inc. (“Aster”) 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. As an agency receiving federal financial assistance, Aster makes the following community outreach efforts:

- East Valley older adults are invited to participate in our programs and activities at Aster’s Mesa Downtown Senior Center and Red Mountain Senior Center. The Center are open Monday through Friday, 8:00 AM to 4:00 PM.
- Participants of Aster’s senior centers elect their peers to serve on Senior Center Advisory Site Councils.
- Older adults are encouraged to explore Aster’s core programs for assistance with their needs. In addition to our Center-Based Services, Aster offers Meals on Wheels, In-Home Support, and Outreach and Social Services.
- Participants of all Aster programs are encouraged to complete surveys as scheduled annually.
- Outreach is conducted on an ongoing basis through meetings with and referrals from community partners, participation with tables at community events and health fairs, visits to senior mobile home parks and housing communities, and collaboration with other aging service providers.
- Spring Healthy Expos are held at Aster’s Mesa Downtown Senior Center and Red Mountain Senior Center. These events are generally scheduled to be held in March.
- Aster provides a weekly e-newsletter. Sign-up is available through our website at www.asteraz.org.
- Aster provides a monthly paper newsletter monthly to senior center participants. Call 480-964-9014 to be added to the mailing list.
- Aster is engaged in social media platforms including Facebook, Instagram, and LinkedIn.

Aster 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.

Aster Aging, Inc.

Limited English Proficiency Plan

The LEP requirement has been suspended per Executive Order #14224 issued 3/1/2025. LEP materials will be updated once new guidance is received.

Non-elected Committees Membership Table

☒ Aster Aging, Inc. does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

- ✓ Aster Aging, Inc. does NOT have subrecipients nor does it monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

Title VI Equity Analysis applies if recipient is 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 refers to storage facilities, maintenance facilities, and operation centers.

☒ Aster Aging, Inc. has no current or anticipated plans to develop new transit facilities covered by these requirements. Aster does not own any facilities.

Board Approval for the Title VI Program

The Aster Aging, Inc. Board of Directors approved the Title VI Implementation Plan at its meeting on September 24, 2026.

The meeting minutes are as follows:

Aster Aging, Inc. Board of Directors Meeting Minutes – September 24, 2026
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Directors Present: Bobbi Boges, Bob Dowd, Curtis Jacobs, Rick Kettner, Sean Lunny, Chris Rhodes, Scott Smith, Jeff Wright

Directors Absent: Shon Hata, Lindsay Leavitt, Jackie Malamitsas, Tony Margalis, Bob White

Staff Present: Susan Dollbaum, Scott Muller, Deborah Schaus

I. Welcome / Call to Order – Bob Dowd, Chair, called the meeting to order at 7:30 AM.

III. Governance and Business Action items

- 2. Approval of the Title VI Implementation Plan** – The Board reviewed the draft plan and documents. Staff noted that updates were required as part of Aster's compliance to the Federal Transportation Administration (FTA) 5310 funding agreement. A motion was made by Chris Rhodes, seconded by Rick Kettner, and approved to accept the plan as presented.