
Title VI Implementation Plan



September 28, 2023 – September 27, 2026

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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. Furthermore, Aster will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

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: pwebster@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.

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 pwebster@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.

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

| | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------|
| 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 |
| 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 Title VI 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:

Aster Aging, Inc.

Human Resources Associate

45 W. University Drive

Mesa, AZ 85201

480-964-9014

A copy of this form can be found online at www.asteraz.org

Title VI Complaint Form-Spanish

Forma Para Poner una Queja De Acuerdo Al Título VI

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): _____

Nombre de la persona a la quien se discriminó
(alguien que no sea la persona que está poniendo la queja): _____

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).

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

¿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 Federal Agencia Estatal
 Corte Estatal Agencia Local

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 anexas cualquier material escrito u otra información que usted crea que es relevante sobre su queja.

Firma de la persona que presenta la queja: _____ Fecha: _____

Someta la forma y cualquier información adicional a:

Aster Aging, Inc.
Human Resources Specialist
45 W. University Dr., Mesa, AZ 85201
Phone: 480-964-9014 TTY: 800-842-4681
Correo electrónico: amontes@asteraz.org

Número de Anexos: _____

Title VI 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) | | | | |

- ✓ Aster Aging, Inc. has not had any Title VI complaints, investigations, or lawsuits during the review period of September 24, 2020 through September 28, 2023.

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.
- Aster co-hosts the Annual Healthy Living Expo held in November at the Mesa Convention Center.
- Spring Healthy Expos are held at Aster’s Mesa Downtown Senior Center and Red Mountain Senior Center.
- Aster provides a weekly e-newsletter. Sign-up 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, Twitter, 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.

Limited English Proficiency Plan

Aster Aging, Inc. Limited English Proficiency Plan



Aster Aging, Inc. (“Aster”) 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 Aster 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 Aster’s extent of obligation to provide LEP services, Aster 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 Aster service area who may be served or likely to encounter by Aster program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an Aster service;
- 3) The nature and importance of the program, activities or services provided by Aster to the LEP population; and
- 4) The resources available to Aster and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish 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

Aster Aging, Inc. complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. 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
- (4) Public Hearings

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 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 28, 2023.

The meeting minutes are as follows:

**Aster Aging, Inc.
Board of Directors Meeting Minutes – September 28, 2023**

Directors Present: Kathy Abernathy, Anthony Cali, Justin Clamage, Jeff Cooley, Mike Fleming, Sean Lunny, Tony Margalis, Nate Marshall, Sue Ann Perkinson, Otto Shill

Directors Absent: Bob Dowd, Jackie Malamitsas, Bob White

Guest Present: Jenaye Collins, Mesa Leadership

Staff Present: Delana Butler, Susan Dollbaum, Dan Lawler, Kathi Mosher, Deborah Schaus

- I. **Welcome / Call to Order** – Nate Marshall, Vice-Chair, called the meeting to order at 7:30 AM in the absence of Bob Dowd, Chair.

The following are excerpts of the minutes related to the Title VI Compliance Plan

III. Governance and Business Action Agenda

- 1. **Civil Rights Act (Title VI) and Americans with Disabilities Act (ADA) Compliance Plans** – The Board reviewed the draft plans and documents. Staff noted that updates to these documents were required as part of Aster’s Federal Transit Administration (FTA) 5310 funding contract. The notices, in both English and Spanish, will be posted to the website and at the senior centers. A motion was made by Mike Fleming, seconded by Sue Ann Perkinson, and approved to accept the plans as presented.