

## TOWN OF GUADALUPE Title VI Plan-5310

# C2022-50 <br> Title VI Implementation Plan 

## The 3 Year Implementation Dates are

## March 1, 2023-February 28, 2026

## Contents

Title VI Policy Statement ..... 3
Title VI Notice to the Public ..... 4
Title VI Notice to the Public-Spanish ..... 5
Guadalupe Senior ..... 6
Title VI Complaint Procedures ..... 6
Title VI Complaint Procedures-Spanish I Title VI Implementation Plan ..... 9
Title VI Complaint Form ..... 10
Title VI Investigations, Complaints, and Lawsuits ..... 12
Public Participation Plan. ..... 13
Limited English Proficiency Plan ..... 15
Non-elected Committees Membership Table ..... 19
Monitoring for Subrecipient Title VI Compliance ..... 20
Title VI Equity Analysis. ..... 21
Board Approval for the Title VI Program ..... 22

## Title VI Policy Statement

The TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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 or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any TOWN OF GUADALUPE, SENIOR BUS TRANSIT sponsored program or activity. There is no distinction between the sources of funding.

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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, TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM distributes Federal-aid funds to another entity/person, TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM will ensure all subrecipients fully comply with TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM Title VI Nondiscrimination Program requirements. The Mayor of Guadalupe has delegated the authority to Amber Carter, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

## Taleetwo

Valerie Molina, Mayor, Town of Guadalupe

## Title VI Notice to the Public

## Notifying the Public of Rights Under Title VI TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM

The TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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 the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM.

For more information on the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM civil rights program, and the procedures to file a complaint, contact Amber Carter, 480-505-5393, (TTY 1-800-367-8939); email acarter@guadalupeaz.org; or visit our administrative office at 9241 S . Avenida del Yaqui, Guadalupe, AZ 85283. For more information, visit guadalupeaz.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. $1^{\text {st }}$ Ave., Suite 900 , Phoenix AZ 85003 FTA: ATTN: Title VI Program Coordinator, East Building, $5^{\text {th }}$ Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 480-505-5393. Para información en Español llame: Amber Carter, Senior Center Director, 480-505-5393.

The above notice is also posted in the following locations: Online at guadalupeaz.org, the Senior Center Office's Information booth and inside each Senior Transit Bus.

This notice is posted online at guadalaupeaz.org

## Title VI Notice to the Public -Spanish

## Aviso al Público Sobre los Derechos Bajo el Título VI TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM (y sus subcontratistas, si cualquiera) asegura complir 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 pais de origen.

Para obtener más información sobre la TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM programa de derechos civiles, y los procedimientos para presentar una queja, contacte Amber Carter, 480-505-5393, (TTY 1-800-367-8939); or visite nuestra oficina administrativa en 9241 S. Avenida del Yaqui, Guadalupe, AZ 85283. Para obtener más información, visite guadalupeaz.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. $1^{\text {st }}$ 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: Online at guadalupeaz.org, the Senior Center Office's Information booth and inside each Senior Transit Bus.

This notice is posted online at guadalaupeaz.org

## Guadalupe Senior

## Title VI Complaint Procedures

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 Guadalupe Senior Bus Transit Program GUADALUPE SENIOR BUS TRANSIT PROGRAM 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 Guadalupe Senior Bus Transit Program'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 GUADALUPE SENIOR BUS TRANSIT PROGRAM 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 GUADALUPE SENIOR BUS TRANSIT PROGRAM or submitted to the State or Federal authority for guidance.
(7) GUADALUPE SENIOR BUS TRANSIT PROGRAM will notify the Title VI Coordinator of ALL Title VI complaints within 72 hours via telephone at 602-262-7242; email at PHXTransitEO@phoenix.gov.
(8) GUADALUPE SENIOR BUS TRANSIT PROGRAM 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 GUADALUPE SENIOR BUS TRANSIT PROGRAM decision 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. $1^{\text {st }}$ Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN: Title VI Program Coordinator, East Building, $5^{\text {th }}$ Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
(11) A copy of these procedures can be found online at: https://www.guadalupeaz.org/senior-center-transportation/pages/documents

## Guadalupe Senior

## Procedimientos de Quejas del Titulo VI

Estos procedimientos proporcionan orientación para todas las quejas presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964, ya que se relacionan con cualquier programa o actividad que sea administrada por Guadalupe Senior Bus Transit Program, incluyendo consultores, contratistas y proveedores. La intimidación o represalia como resultado de una queja está prohibida por la ley. Además de estos procedimientos, los reclamantes se reservan el derecho de presentar una queja formal ante otras agencias estatales o federales o de buscar un abogado privado para las quejas que alegan discriminación. Se hará todo lo posible para resolver las quejas en el nivel más bajo posible.

1) Cualquier persona que crea que él y ella ha sido discriminado por motivos de raza, color $u$ origen nacional puede presentar una queja del Título VI completando y presentando el Formulario de Queja título VI del Programa de tránsito de autobuses de ancianos de Guadalupe.
2) Las quejas formales deben presentarse dentro de los 180 días naturales siguientes a la última fecha del presunto acto de discriminación o la fecha en que la supuesta discriminación se conoció por los reclamantes, o cuando ha habido un curso continuo de conducta, la fecha en que se interrumpió la conducta o la última instancia de la conducta.
3) Las quejas deben estar por escrito y firmadas por el/los reclamante(s) y deben incluir el nombre, la dirección y el número de teléfono del reclamante, La persona de contacto del Título VI ayudará al reclamante 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 del reclamante y la intención de proceder con la queja. Para ello, el reclamante debe enviar por correo una copia original firmada del fax o la transmisión por correo electrónico para que la queja sea procesada.
5) Las denuncias recibidas por teléfono se reducirán a escrito y se proporcionarán al reclamante para su confirmación o revisión antes de su procesamiento. Se enviará un formulario de queja al denunciante para que lo complete, firme y devuelva para su procesamiento.

Title VI Complaint Procedures-Spanish I Title VI Implementation Plan
6) Una vez presentado GUADALUPE SENIOR BUS TRANSIT PROGRAM revisará el formulario de queja para determinar la jurisdicción, Todas las quejas recibirán una carta de reconocimiento informándole si la queja será investigada por el GUADALUPE SENIOR BUS TRANSIT PROGRAM o presentada al Estado o a la autoridad federal para orientación,
7) Guadalupe notificará al Coordinador del Título VI todas las quejas del Título VI en un plazo d e 72 horas por teléfono al: 602-262-7242; correo electrónico a: PHXTransitEO@phonix.gov.
8) GUADALUPE SENIOR BUS TRANSIT PROGRAM tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el reclamante. El reclamante tiene 60 días hábiles a partir de la fecha de envío de la información solicitada al investigador asignado al caso, Si el investigador no es contactado por el reclamante o no recibe la información adicional dentro de los 30 días hábiles, la Autoridad puede cerrar administrativamente el caso. Un caso puede cerrarse administrativamente también si el reclamante ya no desea continuar con su caso.
9) Después de que el investigador revisa la queja, emitirá una de las dos cartas al reclamante: una carta de cierre o una carta de hallazgo (LOF). Una carta de cierre resume las alegaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume las acusaciones y las entrevistas sobre el presunto incidente, y explica si se producirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el reclamante desea apelar la decisión, tiene 30 días después de la fecha de la carta o de la LOF para hacerlo.
10) Un reclamante insatisfecho con la decisión de GUADALUPE SENIOR BUS TRANSIT PROGRAM 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. $1^{\text {st }}$ Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor -TCR 1200 New Jersey Ave., SE Washington DC 20590una
copia de estos procedimientos se puede encontrar en línea en:
https://www.guadalupeaz.org/senior-center-transportation/pages/documents

## Title VI Complaint Form

## IITLE VI COMPLAINT FORM

Any person who beteves that the or she has been discriminabed satinat by Veliey Metro or City of Phoenix or ony of its service providers and believes the discrimination wes based upon rece, color or nationst origin, miny fine o formst complaint with Valley Matro Cusfomer Service.

Pletes prowide the following informetion to process your comptaint. Altarnative formats and languapes are
 cert pedtemmetro.org.

| SECTION 1: CUSTOMERINFORMATION |  |
| :---: | :---: |
| First Name | Lenet Nems: |
| Address: |  |
| Cily: | State: $\qquad$ Zip: |
| Home Phone: | Celd Phone; |
| Ement | Prefurred method of contectit iPhone IEmall |
| SECTION 2: INCIDENT INFORMATION |  |


$\square$
Have you fied this complaint with the Fadenal Transit Admindstretion (FTA)? ! Yes! No

Address:
Thice $\qquad$
Heve you previously fed a Tille V complaint whth this egency? IT Yes I iNo Signature and date required betown:

## Stgneture

Datw
$\qquad$

Please submit this form in person at the address below, or mail this form to:
Town of Guadalupe Senior Center Bus Transit Program, Amber Carter, Senior Center Director. 9401 S. Avenida del Yaqui, Guadalupe, AZ 85283. Or contact Amber Carter at 480-505-5393 or acarter@guadalupeaz.org.

A copy of this form can be found online at guadalupeaz.org
10 Title VI Complaint Form | Title VI Implementation Plan

## FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Casiquer persone que crea que ha sido discriminsda por Viniey Metro o la Ciudad de Phoenix o por cuziquiera de sus provesdores de sention y cree que bo oriscriminsción fue baseda en su rata, cotor u origen nacional, puede renistrar una queia formal ante el Servicio all Chiste de Velley Metro.

Por favor provea te siquiente información para procesan su queja. Hay formains e idiomas atiomativos disponitias si se soticion Usted se puade comunicar con ef Servicio al Cliente larn ado alion2.253.5000


## SECCION 1:INFORMACION DEL CLIENTE



## SECCION 2:INFORMACION SOBREEL INCIDENTE

| Fechs dell Incidente: | Hora del incidente: $\quad$ CAM PM Cintad: |
| :---: | :---: |
| Ubicación del inctidente: | Dirección del Virie: |
| Rutay | Autobisfren ligero/Tramia*. |
| Tpo de Senvicio [autab |  |
| Nombre dethe Oparadort |  |
| Descripción delks Operad |  |
| ¿En qué se basó la disert <br> QRaze Coler O | (Marque todo io que see eplionbie): <br> nalomo |

Explique lo mis ciarmmerde posible lo que zuowdó y por qué cree usted que se le discriminó. Describa a todas las personas que estivieron imolucradias. Incliya et nombre y la información de contacto de tyes personats que le ciscriminotaron (si los conock), asi como los nombres y ka información de contacto de cuakquar testigo. Si se necemita mỏs ecpacio, por fawor use el reverso de esta forma. Usted tembién puede adjuntar cualquier material por escrito u otra información relevarthe as su quefia.


## 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.

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

$X$ The Town of Guadalupe has not had any Title VI complaints, investigations, or lawsuits in 2020-2022.

12
Title VI Investigations, Complaints, and Lawsuits | Title VI Implementation Plan

## Public Participation Plan

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM
Public Participation
Plan

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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, TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM will make the following community outreach efforts:

The Town of Guadalupe, Arizona holds council meeting every $2^{\text {nd }}$ and $4^{\text {th }}$ Thursdays of every month (unless noted otherwise). They begin at 6 pm and continue from a call to the audience and through the agenda before them. The meeting is held at Guadalupe Town Hall, 9241 S. Avenida del Yaqui, Guadalupe, Arizona 85283.

Meeting agendas and meeting minutes can be found on the Town's website guadalupeaz.org and are also available at the Town Clerk's office, 9241 S. Avenida del Yaqui.

In the upcoming year TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM will make the following community outreach efforts:

In addition to council meetings, public outreach will be conducted at Town events. These events include Guadalupe Days, Fourth of July, Spooktacular, Guadalupe Tree Lighting, and Christmas Day in Guadalupe. The dates and times of these events and many others are posted at Guadalupeaz.org as the event is planned

## 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.

The Town of Guadalupe 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.

14 Public Participation Plan | Title VI Implementation Plan

## Limited English Proficiency Plan

$$
\begin{gathered}
\text { TOWN OF GUADALUPE, } \\
\text { SENIOR BUS TRANSIT } \\
\text { PROGRAM } \\
\text { Limited English Proficiency Plan }
\end{gathered}
$$

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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 TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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 TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM's extent of obligation to provide LEP services, the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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 TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM service area who may be served or likely to encounter by TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM, activities, or services; Using the 2020 ACS, American Community Survey, from the U.S. Census Bureau, it was found that $62 \%$ of residents spoke a different language than English at home, with $56.6 \%$ being Spanish speaking residents. With the relatively small service area the Town of Guadalupe serves it is likely a staff member encounters eligible LEP persons on a weekly basis, throughout all programming, such as, the Senior Bus Transit Program.

| Measure | Value |
| :--- | ---: |
| English only | $36.7 \%$ |
| Spanish | $56.6 \%$ |
| Other Indo-European languages | $0.9 \%$ |
| Asian and Pacific Islander languages | $1.3 \%$ |
| Other languages | *data found at census.gov from the 2020 ACS |

2) The frequency with which LEP individuals come in contact with TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM services; the Guadalupe community that utilizes the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM is less than a mile in area. TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM serves within the boundaries of Mineral Road to the north, Baseline Road to the south, Highline Canal to the West and I-10 Freeway to the east. The primary language in the service area spoken is predominately Spanish, making contact with LEP individuals very frequent. There is an average of 4 eligible LEP individuals

16 Limited English Proficiency Plan | Title VI Implementation Plan
that use TOWN OF Guadalupe services weekly. Most frequently for transportation needs such as, but not limited to, rides home, store trips for personal needs, medical and financial errands, activities, and events.

3) The nature and importance of the program, activities or services provided by the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM to the LEP population has been shown to be of utmost importance as many residents lack reliable transportation for their everyday needs. By offering the services and activities that our program entails of, we are not only adding to necessities for everyday living but also to the quality of which participants are living. The importance of the TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM is a responsibility that cannot be understated, to ensure all eligible persons have the opportunity to benefit from the services that are offered.
4) The resources available to TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

The TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM has limited staff and financial resources, which makes the translation of all materials cost prohibitive, however all staff make every effort to ensure translation in Spanish are included in all publications through hard copy or online, as well as bilingual staff available in every department.

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

TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM 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) Bus Schedules
(5) Route Changes
(6) Public Hearings

## Non-elected Committees Membership Table

A sub recipient who selects 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.

Table Depicting Membership of Committees, Councils, Broken Down by Race

| Body | Caucasian | Latino | African American | Asian American | Native American |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Population | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% |
| TYPE THE NAME OF THE COMMITTEE HERE | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% |
| TYPE THE NAME OF THE COMMITTEE HERE | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% |
| TYPE THE NAME OF THE COMMITTEE HERE | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% | TYPE \% HERE\% |

Describe the process the agency uses to encourage the participation of minorities on such committees should be included

X TOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

## Monitoring for Subrecipient Title VI Compliance

XTOWN OF GUADALUPE, SENIOR BUS TRANSIT PROGRAM does NOT monitor subrecipients for Title VI compliance.

The Town of Guadalupe does not have subrecipients utilizing the Senior Bus Transit Program.

## Title VI Equity Analysis

A sub recipient 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 sub recipient organization receives any FTA dollars, it must comply with this requirement.

The Town of Guadalupe has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since January 1980.

## Board Approval for the Title VI Program

RESOL UTHON MO. R2020.05

- A RESOLUTION OF THE TOWN COUNGL OF THE TOWN OF GUADLAUPE, ARIZONA AUTHORIZING THE MAYOR TO APPROVE THE TOWN OF GUADALUPE FEDERAL TRANSIT ADMINISTRATHON TITLE VI PROGRAM IMPLEMENTATION PLAN FOR THE SENIOR BUS TRANSIT PROGRAM

WHEREAS, Title VI of the Cival Rights Act of 1964 prohitits discrimination by recipients of foderal financial assistance on the basis of race, coler, and national cigin, incuding the denial of meaningful accoss for mimitad English proficient persons; and,

WHEREAS, the Federal Transit Administration (FTA) requires that at recipionts of foderal funds document their complanae by submitting a Tite VII Program once every three years and,

WHEREAS, according to Tite VIrequirements, the appropiate goveming entity of all recipients must approve the TAte VI Program Implementation Program for the Senior Bus Transit Program prior to submission to FTA;

NOW, THEREFORE, BE IT RESOLVED BY THE TOMN COUNCIL OF THE TOWN OF GUADALUPE, ARIZONA, as follows:

The Town of Guadelupe Federal Transil Administration Tike Vi Program moplemantation Plan for the Senior Bus Transil Program is approved.

PASSED AND ADOPTED BY THE TOWN COIRNCLL OF THE TOWN OF GUADALUPE, ARIZONA, this 27 , day of February, 2020.


