

# Title VI Plan Cover Page

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## CHRISTIAN CARE TUCSON, INC. 2025



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**Address: 8111 E Broadway Blvd, Tucson, AZ 85710**

**Web Address:**

**<https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>**

**Para Información en Español: Marissa Soto, p: (520) 731-6695**

# Title VI Plan Table of Contents

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Title VI Plan Cover Page.....	1
Title VI Plan Table of Contents .....	2
Executive Summary .....	3
Non Discrimination Notice to the Public.....	4
Non Discrimination Notice to the Public - Spanish .....	5
Non Discrimination ADA/Title VI Complaint Procedures .....	6
Discrimination ADA/Title VI Complaint Form.....	8
Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits .....	10
Public Participation Plan.....	11
Limited English Proficiency Plan.....	15
Non-elected Committees Membership Table .....	22
Monitoring for Subrecipient Title VI Compliance.....	23
Title VI Equity Analysis.....	23
Fixed Route Transit Provider Analysis .....	24
Board Approval for the Title VI Plan.....	25

# Executive Summary

Christian Care Tucson, Inc. (DBA Fellowship Square-Tucson) is part of the larger non-profit Christian Care, Arizona's largest not-for-profit Senior Living provider dedicated to providing seniors with affordable housing and nursing care. Christian Care Tucson, Inc. is a resort-style senior living community offering both Independent and Assisted Living. Christian Care Tucson, Inc. is a new recipient of 5310 funds as of 2025 , which we will utilize to provide vehicles that will transport our over 500 residents to and from their appointments, medical needs, errands, and off-campus activities.

**What type of program fund(s) did you apply for?**

- ☒ 5310
- ☐ 5311
- ☐ Other (please explain) \_\_\_\_\_

**Type of Funding Requests? (Check all that apply)**

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

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

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

# Non Discrimination Notice to the Public

## Notifying the Public of Rights Under Title VI and ADA Christian Care Tucson, Inc.

**Christian Care Tucson, Inc.** operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **Christian Care Tucson, Inc.**.

For more information on the **Christian Care Tucson, Inc.**'s civil rights program, and the procedures to file a complaint, contact **Ed Johnson, Chief Human Resources Officer, (602) 443-5413, (TTY 711); email ed.johnson@christiancare.org;** or visit our administrative office at **8111 E Broadway Blvd, Tucson, AZ 85710.** For more information visit: <https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office.** ATTN: Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **8111 E Broadway Blvd, Tucson, AZ 85710.** \*Para información en Español llame: **Marissa Soto, p: (520) 731-6695**

# Non Discrimination Notice to the Public - Spanish

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## Aviso Público Sobre los Derechos Bajo el Título VI Y ADA Christian Care Tucson, Inc.

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

Para obtener más información sobre el programa de Derechos Civiles de **Christian Care Tucson, Inc.**, y los procedimientos para presentar una queja, contacte **Ed Johnson, Chief Human Resources Officer (602) 443-5413, (TTY 711)**; o visite nuestra oficina administrativa en **8111 E Broadway Blvd, Tucson, AZ 85710**. Para obtener más información, visite <https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: **the main reception lobby, activity/transportation office, administrative office, and in each vehicle.**

This notice is posted online at <https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>

# Non Discrimination ADA/Title VI Complaint Procedures

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These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **Christian Care Tucson, Inc.** including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within **180** calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted **Christian Care Tucson, Inc.** 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 **Christian Care Tucson, Inc.** or submitted to the State or Federal authority for guidance.

- (7) **Christian Care Tucson, Inc.** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov).
- (8) **Christian Care Tucson, Inc.** has **60** business 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 60 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (10) A copy of either the closure letter or LOF must be also be submitted to ADOT within **72** hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with **Christian Care Tucson, Inc.** decision may file a complaint with the Arizona Department of Transportation (**ADOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **ADOT**: ATTN ADA/Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at:  
**<https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>**

If information is needed in another language, contact **8111 E Broadway Blvd, Tucson, AZ 85710**.

\*Para información en Español llame: **Marissa Soto, p: (520) 731-6695**

# Discrimination ADA/Title VI Complaint Form

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <b>Section III</b>.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		
_____ _____ _____		
<b>Section VI:</b>		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No



If yes, please provide any reference information regarding your previous complaint.

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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:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

**Christian Care Tucson, Inc.**

**Ed Johnson, Chief Human Resources Officer**

**8111 E Broadway Blvd, Tucson, AZ 85710**

**(602) 443-5413**

**ed.johnson@christiancare.org**

A copy of this form can be found online at  
**<https://www.fellowshipsquareseniorliving.org/campus/az/tucson/title-vi-ada-compliance/>**

If information is needed in another language, contact **8111 E Broadway Blvd, Tucson, AZ 85710**. \*Para información en Español llame: **Marissa Soto, p: (520) 731-6695**

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

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

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

☒ **Christian Care Tucson, Inc.** has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2025**.

# Public Participation Plan

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**Christian Care Tucson, Inc.** 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, **Christian Care Tucson, Inc.** made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.

- ☒ Posted the Nondiscrimination Public Notices to the following locations:
  - ☒ Within transportation vehicles
  - ☒ Lobby of agency
- ☒ Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities (<https://www.fellowshipsquareseniorliving.org/campus/az/tucson/community-events-activities/>)
- ☒ Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

**Christian Care Tucson, Inc.** will make the following community outreach efforts for the **upcoming year**:

- ☒ Expand the distribution of agency brochures
- ☒ Host an information booth at a community event
- ☒ Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.

## Public Participation Plan for Transportation Needs

## **Fellowship Square Tucson**

**Effective Date:** January 21, 2025

### **Purpose**

The Public Participation Plan (PPP) for transportation needs at Fellowship Square Tucson outlines the proactive strategies, procedures, and activities designed to engage our residents in the planning and development of transportation services. This plan is intended to ensure that all residents have a voice in shaping the transportation services provided, making them responsive to the needs and preferences of our senior living community.

### **Goals and Objectives**

The primary goals of the Public Participation Plan are to:

- Ensure that residents of Fellowship Square Tucson have meaningful opportunities to participate in discussions about transportation services.
- Gather input and feedback from residents to identify and address transportation challenges and needs.
- Promote transparent decision-making processes that consider the views and concerns of residents.
- Develop transportation services that enhance mobility, independence, and quality of life for our community.

### **Target Audience**

The target audience for this plan is the residents of Fellowship Square Tucson, a diverse senior living community with varying mobility and transportation needs.

## **Key Components of the Public Participation Plan**

### **1. Public Participation Strategies**

To engage residents in the decision-making process regarding transportation services, Fellowship Square Tucson will implement the following strategies:

- **Surveys and Questionnaires:**  
Surveys will be distributed to residents ahead of each quarterly meeting to assess current transportation needs, preferences, and concerns. The surveys will be available in both paper and digital formats to ensure accessibility.
- **Focus Groups:**  
We will organize small focus group sessions to allow for in-depth discussion with residents who have specific transportation challenges (e.g., mobility issues, and medical transportation needs). These focus groups will complement the quarterly meetings by providing detailed insights into particular concerns.

- **Suggestion Boxes:**  
Physical and virtual suggestion boxes will be placed throughout Fellowship Square Mesa, allowing residents to submit transportation-related comments, questions, or suggestions at any time. These suggestions will be reviewed at each quarterly meeting.
- **One-on-One Resident Meetings:**  
Individual meetings with transportation staff or management will be offered to residents who prefer private discussions regarding their transportation needs.

## 2. Communication and Outreach

To ensure broad participation and awareness, Fellowship Square Tucson will use the following communication methods:

- **Resident Liaison Program:**  
Resident volunteers will act as liaisons between the transportation team and the community, helping to disseminate information and encourage participation among their peers.
- **Multilingual Support:**  
For residents with Limited English Proficiency (LEP), meeting materials and surveys will be translated into the most commonly spoken languages. Interpretation services will also be available during meetings upon request.
- **Reminders and Follow-Ups:**  
Meeting reminders will be sent one week prior to the scheduled date, with a final reminder the day before. After each meeting, a summary of discussions and outcomes will be documented and as appropriate distributed.

## 3. Participation Procedures

During each quarterly meeting, the following procedures will be followed to ensure structured and inclusive participation:

- **Facilitated Discussions:**  
Meetings will be facilitated by a transportation coordinator or a member of the management team to guide discussions and ensure all voices are heard. Residents will be encouraged to ask questions, offer suggestions, and share concerns.
- **Action Plans:**  
After each meeting, action items will be documented, including any proposed changes to transportation services or follow-up activities. These action items will be communicated to residents, along with timelines for implementation.
- **Feedback Loop:**  
Residents will be updated on the progress of any transportation improvements or changes discussed during meetings, ensuring accountability and transparency. Feedback from previous meetings will also be revisited to ensure ongoing resident satisfaction.

## 4. Evaluation and Continuous Improvement

To ensure that the Public Participation Plan remains effective, we will:

- **Monitor Participation Levels:**  
Track meetings and attendance, survey response rates, and the number of suggestions submitted to assess resident engagement.
- **Evaluate Resident Satisfaction:**  
Conduct periodic evaluations to gauge resident satisfaction with both the transportation services and the participation process. This may include follow-up surveys or informal conversations with residents.
- **Adjust Participation Methods:**  
Based on feedback and participation trends, we may adjust our outreach and communication methods to better serve our residents. This could include additional focus groups, more frequent updates, or alternative meeting formats.

## **Desired Outcomes**

The desired outcomes of the Public Participation Plan include:

- **Enhanced Resident Involvement:**  
Increased resident participation in transportation planning and decision-making processes, ensuring that services are tailored to their needs.
- **Improved Transportation Services:**  
Resident feedback will directly inform transportation improvements, resulting in services that are more responsive, accessible, and efficient.
- **Increased Satisfaction and Mobility:**  
By addressing resident concerns and adapting transportation services accordingly, we aim to enhance overall satisfaction and support residents' independence and mobility.

## **Conclusion**

Fellowship Square Tucson is committed to fostering an open, inclusive, and transparent process for addressing transportation needs within our senior living community. By holding quarterly meetings, soliciting feedback through multiple channels, and continuously improving our services based on resident input, we will ensure that transportation services meet the needs of our residents and contribute to their quality of life.

For more information or to provide input, please contact:

Michelle Hernandez

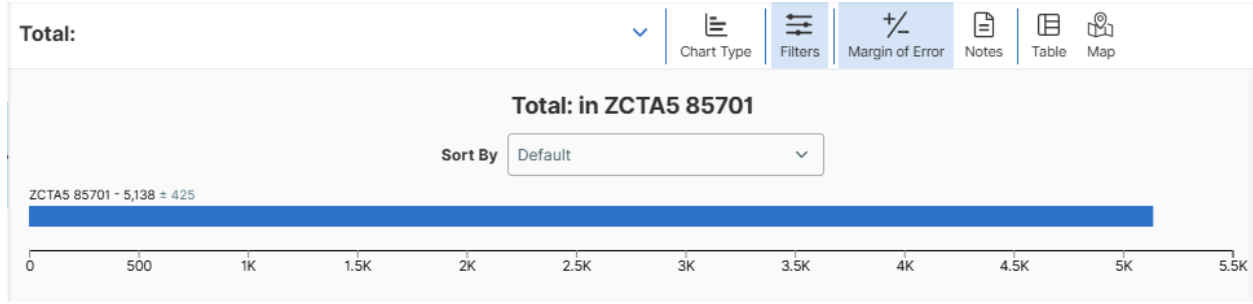
Director of Resident Experiences  
Fellowship Square Tucson  
Phone: (520) 733-0411  
Email: michelle.hernandez@christiancare.org

# Limited English Proficiency Plan

**Christian Care Tucson, Inc.** 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 **Christian Care Tucson, Inc.** 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 **Christian Care Tucson, Inc.**'s extent of obligation to provide LEP services, the **Christian Care Tucson, Inc.** 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 **Christian Care Tucson, Inc.** service area who may be served or likely to encounter by **Christian Care Tucson, Inc.** program, activities, or services: **1,869**



- 2) The frequency with which LEP individuals come in contact with a **Christian Care Tucson, Inc.** services:

**Christian Care Tucson, Inc.**'s staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2025**. **Christian Care Tucson, Inc.** averages **13** contacts per **1 DAY**.

- 3) The nature and importance of the program, activities or services provided by the **Christian Care Tucson, Inc.** to the LEP population.

- 4) The resources available to **Christian Care Tucson, Inc.** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

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

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

**Christian Care Tucson, 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) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

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

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

1) **Christian Care Tucson, Inc.** provides language assistance services through the below methods:

- ☒ Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
- ☒ Instructions are provided to customer service staff and other **Christian Care Tucson, Inc.** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- ☒ Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
- ☒ Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
- ☒ Bilingual or multilingual versions of:
  - ☒ "How to ride" brochures
  - ☒ System maps and timetables
  - ☒ Safety and security announcements
  - ☒ Service change announcements



2) **Christian Care Tucson, Inc.** has a process to ensure the competency of interpreters and translation service through the following methods:

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

3) **Christian Care Tucson, Inc.** provides notice to LEP persons about the availability of language assistance through the following methods:

- ☒ Posting signs in intake areas and other points of entry
- ☒ Signs and handouts available in vehicles and at stations
- ☒ Announcements in vehicles and at stations
- ☒ Agency websites

4) **Christian Care Tucson, Inc.** monitors, evaluates and updates the LEP plan through the following process:

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

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

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

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

## Limited English Proficiency (LEP) Plan

**Organization:** Fellowship Square Tucson  
**Effective Date:** 3/1/2025

### Purpose

The Limited English Proficiency (LEP) Plan outlines proactive strategies and procedures to ensure that individuals with Limited English Proficiency have meaningful access to the benefits, services, and information provided by Fellowship Square Tucson. This plan is designed to comply with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, ensuring that no person is denied access to our programs and services based on their ability to communicate in English.

### Definition of LEP Individuals

LEP individuals are those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Fellowship Square Tucson

recognizes the importance of ensuring meaningful access to information and services for LEP individuals.

## **Key Components of the LEP Plan**

### **1. Identifying LEP Individuals in Need of Assistance**

To ensure that we meet the needs of LEP individuals, Fellowship Square Tucson will:

- Assess the language needs of our community by conducting periodic reviews of demographic data, such as census information, surveys, and resident requests.
- Identify LEP individuals during intake and service interactions by offering language assistance in the preferred language of the individual.
- Record and track residents' language preferences for future interactions, ensuring that appropriate assistance is available when needed.

### **2. Language Assistance Measures**

To provide meaningful access to services, Fellowship Square Tucson will employ the following language assistance strategies:

- **Translation of Vital Documents:** We will translate key documents, such as applications, brochures, notices, and consent forms, into the most common languages spoken by LEP individuals in our service area. Translated documents will be made available in print and digital formats.
- **Oral Interpretation Services:** LEP individuals will have access to qualified interpreters, either in person or via phone interpretation services, for any interactions involving our programs and services. This includes intake meetings, interviews, appointments, and inquiries.
- **Bilingual Staff:** We will identify and utilize bilingual staff members to assist LEP individuals. Fellowship Square Tucson will encourage the hiring of bilingual employees who can provide direct language assistance.
- **Signage and Notification:** Prominent signage in common areas will inform LEP individuals of the availability of free language assistance services. We will also include notifications about language services on our website and in printed materials.

### **3. Staff Training**

All Fellowship Square Tucson staff will receive training on the following:

- **Identifying LEP Needs:** Staff will learn how to identify when an individual requires language assistance, including recognizing signs of limited English proficiency and using language identification cards.
- **Providing Language Assistance:** Employees will be trained on the procedures for requesting interpretation or translation services, utilizing bilingual staff, and accessing external language assistance resources.

- **Cultural Sensitivity:** Training will include cultural competency to ensure that staff communicate respectfully and effectively with individuals from diverse linguistic and cultural backgrounds.

#### 4. Monitoring and Evaluating the LEP Plan

Fellowship Square Tucson will regularly monitor and evaluate the effectiveness of the LEP Plan by:

- Reviewing LEP-related service requests, feedback from staff, and interactions with LEP individuals to identify areas for improvement.
- Updating translations and resources as the community's language needs change, ensuring that we are responsive to shifts in the population.
- Seeking input from LEP individuals, families, and community stakeholders on how to improve access to services.

#### 5. Desired Outcomes

The primary goal of this LEP Plan is to ensure that LEP individuals can fully participate in and benefit from the services and programs offered by Fellowship Square Tucson. Desired outcomes include:

- **Increased Access:** LEP individuals will have equal access to information, services, and benefits provided by our programs.
- **Improved Communication:** All LEP individuals will be able to communicate effectively with staff and access vital information in their preferred language.
- **Enhanced Service Delivery:** Fellowship Square Tucson will deliver high-quality, culturally competent services to LEP individuals in a manner that respects their linguistic and cultural needs.
- **Resident Satisfaction:** LEP individuals and their families will experience increased satisfaction with our programs and services due to improved communication and access.

### Implementation Plan

#### Step 1: Assessment of Language Needs

Fellowship Square Tucson will conduct a language needs assessment to determine which languages are most frequently spoken by LEP individuals in our community. This assessment will be reviewed annually to keep pace with demographic changes.

#### Step 2: Provision of Language Assistance

We will develop a list of commonly requested documents for translation and identify key staff members responsible for coordinating interpretation and translation services. A system for tracking and updating LEP service requests will be implemented.

### **Step 3: Staff Training**

Initial staff training sessions will be conducted to familiarize employees with the LEP Plan, with ongoing training provided to new hires. Annual refresher courses will ensure staff remain proficient in implementing LEP procedures.

### **Step 4: Monitoring and Reporting**

Regular reports on LEP service usage and feedback will be compiled to assess the effectiveness of the LEP Plan. These reports will guide adjustments to service provisions, translation needs, and staff training initiatives.

# Non-elected Committees Membership Table

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

☒ **Christian Care Tucson, Inc.** does not select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Subrecipient Title VI Compliance

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

☒ **Christian Care Tucson, Inc.** does not monitor subrecipients for Title VI compliance as it does not have any FTA subrecipients.

## Title VI Equity Analysis

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A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

☒ **Christian Care Tucson, Inc.** has no current or anticipated plans to develop new transit facilities covered by these requirements

# Fixed Route Transit Provider Analysis

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

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

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

☒ **Christian Care Tucson, Inc.** is not a Fixed Route Transit Provider.





Christian Care Companies  
Board of Directors  
In-Person Meeting  
March 1, 2025

**Christian Care Board Member Attendance**

	Rhonda Anderson	X	Alan Hieb
X	Roger Blumenthal	X	Anne McNamara
X	Bill Dodson	X	John Norris
	Rob Faulk	X	Dennis Rutherford
X	Tom Greer		

Chairman Roger Blumenthal presiding. Roger opened with a short devotional.

**Motion:** A motion was entertained to accept the minutes for the 12-14-24 meeting as presented. **MSP:** Tom Greer, Anne McNamara.

**CFO Report**

- Kathi Condon reviewed the financials as of 12-31-24.

**CEO Report**

- Alan Hieb thanked the Board of Directors for their service to Christian Care/Fellowship Square.

**Old Business**

No old business was presented.

**New Business**

Alan presented the following for approval:

- Approval sought for Title VI Pima Association of Governments (PAGS) Grant for resident transportation for the Tucson campus. The funding request is for a total of \$461,268 – the Federal funding amount would be \$386,061 and our match would be \$105,207.

**MSP:** John Norris, Anne McNamara

Meeting adjourned at 12:11 pm

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John Norris", written over a horizontal line.

John Norris  
Board Secretary