
Title VI Implementation Plan

*Catholic Community Services of
Southern Arizona, Inc.*

Implemented: February 2021

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Title VI Policy Statement

The Catholic Community Services of Southern Arizona, Inc. (Catholic Community Services) 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 Catholic Community Services sponsored program or activity. There is no distinction between the sources of funding.

Catholic Community Services 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, Catholic Community Services will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Catholic Community Services distributes Federal-aid funds to another entity/person, Catholic Community Services will ensure all subrecipients fully comply with Catholic Community Services's Title VI Nondiscrimination Program requirements. The Chief Executive Officer has delegated the authority to Teresa Cavendish, Director of Operations, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.


Marguerite D. Harmon, Chief Executive Officer

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI **CATHOLIC COMMUNITY SERVICES OF SOUTHERN ARIZONA**

Catholic Community Services 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 Catholic Community Services.

For more information on the Catholic Community Services's civil rights program, and the procedures to file a complaint, contact Teresa Cavendish at 520-623-0344 (V/TTY); email teresac@ccs-soaz.org; or visit our administrative office at 140 W. Speedway, Ste. 230, Tucson, AZ 85705. For more information, visit www.ccs-soaz.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 520-623-0344 E. Para información en Español llame: Teresa Cavendish at 520-623-0344.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI CATHOLIC COMMUNITY SERVICES OF SOUTHERN ARIZONA

Catholic Community Services (*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 Catholic Community Services's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Teresa Cavendish 520-623-0344 (V/TTY); o visite nuestra oficina administrativa en 140 W Speedway, Ste 230, Tucson, AZ 85705. Para obtener más información, visite www.ccs-soaz.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: Catholic Community Services, 140 W Speedway, Ste 230, Tucson, AZ 85705. At a minimum it must be posted online and in the public areas of the agency's/transit provider's office(s). This notice should also be posted at stations, stops, and on transit vehicles

This notice is posted online at www.ccs-soaz.org.

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 Catholic Community Services 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 Catholic Community Services 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 Catholic Community Services or submitted to the State or Federal authority for guidance.
- (7) Catholic Community Services 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) Catholic Community Services 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 Catholic Community Services 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.ccs-soaz.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:

Catholic Community Services
ATTN: Title VI Coordinator
140 W. Speedway, Ste. 230
Tucson, AZ 85705
520-623-0344

A copy of this form can be found online at www.ccs-soaz.org

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): _____

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

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

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

Raza/Color (Especifique) _____ Nacionalidad (Especifique) _____

¿En qué fecha(s) sucedió la discriminación? _____

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

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 Estatal _____ Corte Federal _____
Agencia Local _____ Agencia Estatal _____

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

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

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

Firma de la Persona que presenta la queja

Fecha

Número de Anexos: _____

Someta la forma y cualquier información adicional a:

Catholic Community Services
ATTN: Title VI Coordinator
140 W. Speedway, Ste. 230
Tucson, AZ 85705
520-623-0344
www.ccs-soaz.org

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)				

☐ Catholic Community Services of Southern Arizona has not had any Title VI complaints, investigations, or lawsuits in 202__.

Public Participation Plan

Catholic Community Services 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, Catholic Community Services made the following community outreach efforts:

- Expanded the distribution of agency brochures
- Posted the Nondiscrimination Public Notices to the Catholic Community Services agency lobbies
- Posted the Nondiscrimination Public Notices in agency 5310 vehicles
- Partnered with other local agencies to advertise services provided
- Added public interactive content to the agency's webpage for the public as well as used social media platforms to communicate schedule changes or activities
- Provided "call to the audience" opportunities at monthly agency Advisory Board meetings

In the upcoming year Catholic Community Services will make the following community outreach efforts:

- Enhance agency documents/publications to make them more user-friendly, e.g. comment forms or agency brochures
- Expand the use of social media for public outreach

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.

Catholic Community Services may submit 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

Catholic Community Services 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 Catholic Community Services 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 Catholic Community Services's extent of obligation to provide LEP services, Catholic Community Services 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 Catholic Community Services service area who may be served or likely to be encountered by a Catholic Community Services program, activities, or services:

	Arizona	
	Estimate	Margin of Error
Total:	6,375,189	+/-299
Speak only English	4,654,602	+/-9,276
Spanish:	1,308,293	+/-6,971
Speak English "very well"	862,852	+/-6,075
Speak English less than "very well"	445,441	+/-5,245
French (incl. Cajun):	16,502	+/-1,062
Speak English "very well"	13,189	+/-934
Speak English less than "very well"	3,313	+/-495
Haitian:	796	+/-257
Speak English "very well"	544	+/-189
Speak English less than "very well"	252	+/-155
Italian:	6,425	+/-553
Speak English "very well"	5,150	+/-514
Speak English less than "very well"	1,275	+/-246
Portuguese:	3,562	+/-442
Speak English "very well"	2,739	+/-407
Speak English less than "very well"	823	+/-160
German:	20,884	+/-1,144
Speak English "very well"	18,489	+/-1,088
Speak English less than "very well"	2,395	+/-344
Yiddish, Pennsylvania Dutch or other West Germanic languages:	2,992	+/-486
Speak English "very well"	2,669	+/-430

	Arizona	
	Estimate	Margin of Error
Speak English less than "very well"	323	+/-124
Greek:	2,183	+/-353
Speak English "very well"	1,827	+/-311
Speak English less than "very well"	356	+/-119
Russian:	7,680	+/-893
Speak English "very well"	5,297	+/-685
Speak English less than "very well"	2,383	+/-399
Polish:	5,928	+/-656
Speak English "very well"	4,276	+/-556
Speak English less than "very well"	1,652	+/-276
Serbo-Croatian:	6,685	+/-987
Speak English "very well"	4,397	+/-809
Speak English less than "very well"	2,288	+/-420
Ukrainian or other Slavic languages:	3,840	+/-593
Speak English "very well"	2,915	+/-488
Speak English less than "very well"	925	+/-216
Armenian:	1,198	+/-431
Speak English "very well"	987	+/-407
Speak English less than "very well"	211	+/-101
Persian (incl. Farsi, Dari):	6,064	+/-926
Speak English "very well"	3,690	+/-701
Speak English less than "very well"	2,374	+/-473
Gujarati:	3,942	+/-677
Speak English "very well"	2,994	+/-547
Speak English less than "very well"	948	+/-225
Hindi:	11,436	+/-1,042
Speak English "very well"	9,734	+/-887
Speak English less than "very well"	1,702	+/-337
Urdu:	2,304	+/-513
Speak English "very well"	1,968	+/-463
Speak English less than "very well"	336	+/-154
Punjabi:	2,687	+/-599
Speak English "very well"	1,666	+/-350
Speak English less than "very well"	1,021	+/-328
Bengali:	2,461	+/-512
Speak English "very well"	1,698	+/-354
Speak English less than "very well"	763	+/-263
Nepali, Marathi, or other Indic languages:	5,151	+/-825
Speak English "very well"	3,644	+/-642
Speak English less than "very well"	1,507	+/-386
Other Indo-European languages:	11,053	+/-1,088
Speak English "very well"	7,935	+/-886
Speak English less than "very well"	3,118	+/-586
Telugu:	6,151	+/-854
Speak English "very well"	4,740	+/-673
Speak English less than "very well"	1,411	+/-368
Tamil:	5,238	+/-862
Speak English "very well"	4,594	+/-817
Speak English less than "very well"	644	+/-203
Malayalam, Kannada, or other Dravidian languages:	3,376	+/-623
Speak English "very well"	2,861	+/-569
Speak English less than "very well"	515	+/-149
Chinese (incl. Mandarin, Cantonese):	31,733	+/-1,766
Speak English "very well"	15,627	+/-1,173

	Arizona	
	Estimate	Margin of Error
Speak English less than "very well"	16,106	+/-1,231
Japanese:	7,013	+/-710
Speak English "very well"	4,441	+/-562
Speak English less than "very well"	2,572	+/-411
Korean:	9,852	+/-1,017
Speak English "very well"	4,998	+/-720
Speak English less than "very well"	4,854	+/-619
Hmong:	104	+/-92
Speak English "very well"	67	+/-66
Speak English less than "very well"	37	+/-35
Vietnamese:	23,423	+/-1,723
Speak English "very well"	9,659	+/-953
Speak English less than "very well"	13,764	+/-1,112
Khmer:	1,824	+/-423
Speak English "very well"	842	+/-237
Speak English less than "very well"	982	+/-287
Thai, Lao, or other Tai-Kadai languages:	4,441	+/-632
Speak English "very well"	2,328	+/-399
Speak English less than "very well"	2,113	+/-485
Other languages of Asia:	4,073	+/-766
Speak English "very well"	1,936	+/-470
Speak English less than "very well"	2,137	+/-451
Tagalog (incl. Filipino):	24,419	+/-1,379
Speak English "very well"	17,555	+/-1,023
Speak English less than "very well"	6,864	+/-808
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	6,803	+/-686
Speak English "very well"	4,978	+/-626
Speak English less than "very well"	1,825	+/-320
Arabic:	24,275	+/-2,537
Speak English "very well"	14,506	+/-1,708
Speak English less than "very well"	9,769	+/-1,238
Hebrew:	2,540	+/-565
Speak English "very well"	2,004	+/-526
Speak English less than "very well"	536	+/-180
Amharic, Somali, or other Afro-Asiatic languages:	9,283	+/-1,254
Speak English "very well"	4,927	+/-781
Speak English less than "very well"	4,356	+/-805
Yoruba, Twi, Igbo, or other languages of Western Africa:	3,856	+/-715
Speak English "very well"	2,751	+/-582
Speak English less than "very well"	1,105	+/-285
Swahili or other languages of Central, Eastern, and Southern Africa:	6,124	+/-1,209
Speak English "very well"	3,223	+/-772
Speak English less than "very well"	2,901	+/-707
Navajo:	82,691	+/-1,615
Speak English "very well"	62,948	+/-1,535
Speak English less than "very well"	19,743	+/-729
Other Native languages of North America:	27,074	+/-1,079
Speak English "very well"	23,401	+/-1,061
Speak English less than "very well"	3,673	+/-353
Other and unspecified languages:	4,228	+/-606
Speak English "very well"	3,318	+/-506
Speak English less than "very well"	910	+/-279

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Explanation of Symbols:

1. An "" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An "-" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An "-" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An "(X)" means that the estimate is not applicable or not available.

2) The frequency with which LEP individuals come in contact with a Catholic Community Services services;

Catholic Community Services's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for during this Plan time frame. Catholic Community Services averages 50 contacts per WEEK.

3) The nature and importance of the program, activities or services provided by Catholic Community Services to the LEP population: Assistance with housing, job searches, counseling, case management, immigration assistance, nutrition services, child care resources, safe family resources. Importance ranges from moderate importance to extreme importance for individuals requiring assistance from the agency.

4) The resources available to Catholic Community Services and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Overall costs are determined by the need of interpreters and assistance in translation of materials. Costs will vary per individual receiving assistance from the agency.

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. Please see below for other efforts to provide services to LEP individuals.

Safe Harbor Provision

Catholic Community Services 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

1) Catholic Community Services provides language assistance services through the below methods:

- Instructions are provided to customer service staff and other Catholic Community Services 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.

2) Catholic Community Services has a process to ensure the competency of interpreters and translation service through the following methods:

Catholic Community Services 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. Catholic Community Services will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. Catholic Community Services 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. Catholic Community Services 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) Catholic Community Services 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
- Announcements at community meetings
- Information tables at local events
- Agency websites

4) Catholic Community Services monitors, evaluates and updates the LEP plan through the following process:

Catholic Community Services 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. Catholic Community Services will make changes to the language assistance plan based on feedback received. Catholic Community Services may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, Catholic Community Services 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. Catholic Community Services 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) Catholic Community Services 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. Catholic Community Services will implement processes for training of staff through the following procedures:

Catholic Community Services 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. Catholic Community Services 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. Catholic Community Services 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. Catholic Community Services will implement LEP training to be provided for agency staff. Catholic Community Services staff training for LEP to include:

- A summary of the Catholic Community Services responsibilities under the DOT LEP Guidance;
- A summary of the Catholic Community Services language assistance plan;
- A summary of the number and proportion of LEP persons in the Catholic Community Services 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 Catholic Community Services cultural sensitivity policies and practices.

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.

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
TYPE THE NAME OF THE COMMITTEE HERE					
TYPE THE NAME OF THE COMMITTEE HERE					
TYPE THE NAME OF THE COMMITTEE HERE					

☐ XX Catholic Community Services does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

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.

XX Catholic Community Services has no current or anticipated plans to develop new transit facilities covered by these requirements

Board Approval for the Title VI Program

The Title VI Program for Catholic Community Services of Southern Arizona, Inc. was approved by the Board of Directors at a Board Meeting on Wednesday, February 24, 2021. For additional information, please submit a written request to Teresa Cavendish, Director of Operations and Title VI Program Coordinator, at teresac@ccs-soaz.org.

CATHOLIC COMMUNITY SERVICES OF SOUTHERN ARIZONA, INC.
CORPORATE BOARD MEETING
February 24, 2021

--Meeting Conducted by Video Conference--

MINUTES

PRESENT:	Richard Koo, President	Chris Ahearn	Linda Tansik
	Maria Elena McElroy	Mark Mrozowski	Dave Ball
	Dr. Mary Cochran	Elena d'Autremont	Fernando Barraza
	Pat Torrington	Maryann Hockstad	Anne Morales
	Sr. Irma Odabashian	Howard Richard	Mary Anne Fay
	John Lohse	Brian Connelly	Charles Geoffrion
	Tony Fonze	Kim Anderson	Cicely Parseghian

STAFF:	Peg Harmon	Teresa Cavendish	Jesus Fernandez
	Cathy Coulter	Evita Mendez-Counts	
	Marcia Zerler	Deborah Taylor	

GUEST: Dan Torrington

Richard Koo called the meeting to order at 7:30 a.m.; Mark Mrozowski offered prayer to open the meeting.

Richard Koo asked for a motion approving the CCS Board Meeting Minutes of the meeting held January 27, 2021.

Motion to approve the Minutes of the CCS Board Meeting held January 27, 2021 as presented:

M – Pat Torrington

S –Maryann Hockstad

P– Unanimous

Committee Reports:

Finance Committee – *Jesus Fernandez/Fernando Barraza*

Jesus reported current Cash and Equivalents amount is \$3,670,646, which is a difference of about \$1,780,000 over prior year. The Cash and Equivalents amount includes the PPP loan funds received in April of 2020 minus some of the debt paid off over the course of the last 12 months. Capital Campaign cash is \$1,542,824; that is an increase of over \$1 million dollars from a year ago which indicates that the campaign has done reasonably well collecting its pledges. No significant change in our Restricted Cash in investments with Wells Fargo. There was an unrealized loss in the month of January, but by the end of January 31, 2021, the value of our investment portfolio was \$2,397,007 which was still \$272,772. higher than it was a year ago, or 12.84% higher. Accounts and Grants Receivable are at \$2.5 million, which is about a 10% increase from last year. There were new revenues in December and January that were not originally budgeted; both were primarily COVID related funds that funneled from the Federal government

to the City of Tucson to provide services in the areas of the home eviction prevention program and scholarships for children. Those revenues were new to CCS, unbudgeted, and they were significant. Those amounts impacted the Accounts Receivable balance. CCS has collected all of those Receivables. CCS has collected a substantial amount of our Capital Campaign pledges and still has a pledge receivable balance of \$1.1 million. This shows that CCS has been doing well with the Capital Campaign, and secured new campaign commitments in January.

Prepaid expenses remain static at \$126,144. Total assets are \$20,167,495. Accounts Payable is at \$869,300, which is a significant improvement over last year. Accrued Payroll and related taxes are \$1,255,000. Cash reserve side is \$205,500. PPE loan is \$2.7 million. The CCS line of credit remains at \$0. The CCS mortgage was paid off in June 2020. The total of four combined Liabilities is \$5,552,000 as of January 31, 2021. Net Assets are \$14, 614,549. Please refer to the Financial Statement for further information.

Richard Koo asked for a motion approving the Financial Statements for period ending January 27, 2021.

Motion to approve the Financial statement for January 27, 2021:

M – Pat Torrington

S – Maryann Hockstad

P – Unanimous

Public Policy Committee – *Elena d'Autremont*

Dan Torrington reported on the efforts against predatory lending in Arizona which manifests itself as a title loan. Title loans were first approved by the Arizona Legislature 21 years ago. This law allows interest rates from 120% to 204%. They prey on people who are desperate for financial assistance, specifically on low income individuals and Military personnel. An example of this usage is when a person gets a title loan for \$500, maybe to pay their rent, and now owes the balance of \$500 at 204% APR annual percentage rate, which seems to be a usury rate. The US Congress passed a law called the Military Lending Act, which basically prohibits title loan companies from making loans to active military people and their dependents. The military stated they do not want their members entangled in this type of financial instruments. If they are ever called to active duty, they'll never be able to get out of the loan and it would weigh on their family while they are deployed. Most states do not enforce the Military Lending Act unless there is a state law specifically enabling it. In Arizona, we do not have that accompanying state law. Recently, Arizona State Representative Kelly Butler in District 28 introduced legislation that would require the State of Arizona to enforce the Military Lending Act. The bill was introduced into the House of Representatives, it has been assigned to three committees in the house. The three committees are the Commerce Committee, the Military Affairs Committee, and the Rules Committee. At the last Public Policy Committee meeting, Dan Torrington asked the Committee for CCS to use its influence to encourage military base commanders in Arizona to contact the Military Affairs Chairman, Representative Kevin Payne, and ask him to put Bill 2272 on the agenda.

Peg added that the content of Bill 2272 was included in the CCS Board Meeting packet, and advised to reference that document to answer any additional questions. Peg also suggested she could reach out to the Arizona Catholic Conference to see if they would support this issue. In

addition, Peg could reach out to Ron Barber, now with Senator Mark Kelly's office, for support.

Motion is made that Catholic Community Services formally advocate for HG 2272 as an organization.

Motion for Catholic Community Services to advocate for HG 2272:

M – Chris Ahearn

S – Maryann Hockstad

P – Unanimous

Executive Committee – Richard Koo

The Executive Committee took action on the Authorization to Contract in order to allow CCS to enter into a grant application with the City of Tucson for homelessness prevention and housing. The Executive Committee met and certified that there was a standing resolution which authorized the CEO and CFO to execute the agreement and submit the grant application. At its next meeting, the Committee will be reviewing the Authorization to Contract for amendments to content, which will be reviewed by the Leadership Team before being presented to the Board.

Last year, the CCS Board approved a small bonus to every employee in as a show of appreciation for their efforts during these difficult pandemic times. Cathy suggested that we continue to boost morale by sending out a Valentine letter from the Board to all CCS staff. It was distributed as suggested, signed by the Executive Committee on behalf of the full CCS Board.

Strategic Plan Reviews – Tony Fonz

Tony offered that he had spoken with the State Health Information Exchange about CCS, and our desire to incorporate Social Determinants of Health (SDOH) into our programs. He reported he may have identified a method which could accomplish this for all CCS agencies without having them go through an independent and somewhat difficult process. Tony believes his organization's efforts are within a few months of implementing a system supported by AHCCCS that would allow organizations like CCS to use a reporting tool which captures SDOH, and which would then support CCS in requesting and having those needs addressed for its clients. CCS would be among the pilot groups to use the tool. Tony will provide a presentation at a future Mission Effectiveness Committee meeting, and then at a future Board Meeting.

Infrastructure & Tangible Assets (ITA) Committee Goals and Objectives: Dave Ball reviewed the ITA Committee's Strategic Goals and Objectives. The first objective focuses on the redevelopment of infrastructure to support the organization and its goals. The second objective involves reassessing the organization's assets and further identifying future acquisition and maintenance needs for these assets.

Human Resources Committee Goals and Objectives: Maryann Hockstad and Cathy Coulter reviewed the Committee goals. These goals focus on strengthening recruitment, retention, and professional development of all employees and looking at seamless succession planning. There is also an objective to increase employee satisfaction, engagement and retention. This objective will address salary disparities, as well as other employee supports such as recognition and training.

The salary survey CCS is engaged in right now is a necessary part of this objective.

Title VI Plan (Phoenix) Review and Acceptance – *Teresa Cavendish*

Teresa presented the 2021 Title VI Plan for Phoenix for review and acceptance by the Board.

Motion to accept the 2021 Title VI Plan for Phoenix as presented.

M – Pat Torrington

S – Maryann Hockstad

P – Unanimous

Medical Respite – *Peg Harmon*

Peg reported there may be a donor who is interested in donating property for the Medical Respite building. Peg and both Bishops will meet with the potential donor in March, and see whether this will be a suitable arrangement.

Administrative Report – *Peg Harmon*

Peg offered an update on Naquana Borrero. Since her surgery, Naquana has been slowly progressing. She is going through physical therapy and at the present she is waiting on her release from her doctor to return to work.

COVID-19: Peg reported CCS was able to participate in a vaccination program that was tied to our Community Living Program. At this time, all CCS employees in Pima County have been given the opportunity to receive first and second vaccinations. Peg stated HR continues to track exposures and quarantine period for each employee. HR reported a total of 226 employees who had to be screened, and 54 positive cases. Peg stated CCS had the opportunity to distribute around \$800,000 through the Eviction Prevention Program and about \$211,000 through Pio Decimo Center housing and utility assistance. This funding came through the City of Tucson CARES dollars.

Yuma: Evita Mendez-Counts stated there was still time to support the 60th Anniversary celebration of CCS Yuma. Also, Evita has been tracking the situation in Yuma related to increased migrant releases by Border Patrol and maintaining contact with the non-profit coalition which has formed to provide transportation support to Tucson (Casa Alitas) and other shelters for these people. CCS Yuma is working with the City of Yuma to secure funding to expand the floorspace at the Adult Day Health Center (ADHC). They are hoping to re-open ADHC in mid-March, if COVID levels allow. They are getting steadily increasing requests for services, and moving forward to enroll and re-enroll clients.

With no further business to discuss, Richard Koo adjourned the meeting at 9:15 a.m.

EXECUTIVE SESSION: The CCS Board went into Executive Session.

Next Board Meeting will be held via Zoom on March 31, 2021 at 7:30 a.m.