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# *Title VI Implementation Plan*

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*Catholic Community Services of  
Southern Arizona, Inc.*

*Implemented: February 2021*

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# Title VI Policy Statement

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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

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## 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' civil rights program, and the procedures to file a complaint, contact Teresa Cavendish at 520-623-0344 (V/TTY); email [teresac@ccs-soaz.org](mailto: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](http://www.ccs-soaz.org).

A complainant may file a complaint directly with the Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: 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 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](http://www.ccs-soaz.org).

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**). El puede presentar una queja directamente con Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ATTN Title VI Coordinator 302 N. 1<sup>st</sup> 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](http://www.ccs-soaz.org).*

# 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, 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.

- (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: Attention: Title VI Coordinator, 302 N. 1<sup>st</sup> Ave., Suite 900, Phoenix, AZ 85003 or the **Federal Transit Administration (FTA)** offices of Civil Rights: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> 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](http://www.ccs-soaz.org)

# 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		
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 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.

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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:

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](http://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).**

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

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**¿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

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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?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

XX Catholic Community Services of Southern Arizona has not had any Title VI complaints, investigations, or lawsuits in 2020/2021.

# Public Participation Plan

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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
- Outreach on COPD's fundraiser
- Information related to COVID-19 with webinars and training to the Deaf community.

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

Catholic Community Service'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

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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, April 28, 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](mailto:teresac@ccs-soaz.org).

**CATHOLIC COMMUNITY SERVICES OF SOUTHERN ARIZONA, INC.**  
**MEETING OF THE BOARD OF DIRECTORS/THE CORPORATE BOARD MEETING**  
**APRIL 28, 2021**  
**--Meeting Conducted via Video Conference and at CCS' Main Office--**

**MINUTES**

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

ABSENT: Sr. Irma Odabashian  
Naquana Borrero

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

Richard Koo, the President/Chair, noted that notice of this meeting was given on April 21st, 2021, and called this meeting to order at 7:30 am. Charles Geoffrion offered prayer to open the meeting.

The Chair asked Mark Mrozowski to take the minutes of this meeting and make a record of those in attendance. Following a count of the members in attendance, the Chair declared the presence of a quorum.

**Approval of Minutes of Previous Meeting**

As the first order of business, the Chair directed the attention of all members to the Minutes of the Meeting of Corporate Board held on March 31st, 2021, circulated with the notice of this meeting.

Pat Torrington made one comment regarding the minutes of the March 31<sup>st</sup> Board meeting. Restricted cash and investment figures need to be revisited because they seem to be mismatched when compared to the 2/28/21 balance sheet. Agreed to revisit.

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**After discussion, a motion for Members to approve the Minutes of Corporate Board Meeting held on March 31st, 2021, was made, seconded, and unanimously adopted, subject to changes arising from Pat's comment.**

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**Consent Resolutions**

The Chair directed the attention of all Members to the minutes of meetings held and approved by certain CCS Committees, copies of which were circulated prior to this meeting, and called for a motion consenting to the resolutions approved by the applicable Committees.

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**After discussion, a motion to consent was made, seconded and unanimously adopted.**

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### **Committee Reports**

#### **Finance Committee:**

Jesus Fernandez referred to the CCS Financials for the Period Ending February 28, 2021, that he had presented at the CCS Board meeting held on March 31, 2021, a copy of which was recirculated with the notice of this meeting. Those financials had not been approved at the last Board meeting because a number of Board members did not have a chance to look at them prior to that meeting, so the motion to approve them was deferred to this Board meeting.

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**After discussion, a motion for Members to approve the presentation of the CCS Financials for the Period Ending February 28, 2021, was made, seconded, and unanimously adopted.**

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Jesus then presented the CCS Financials for the Period Ending March 31, 2021.

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**After discussion, a motion for Members to approve the presentation of the CCS Financials for the Period Ending March 31, 2021, was made, seconded, and unanimously adopted.**

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Jesus then introduced Introduction of Joseph Sivilli and his colleagues, trading advisor affiliates of Wells Fargo, to discuss their management of the CCS Portfolio. The Sivilli Group highlighted the following

- Due to their length of service to CCS and the outstanding relationship that developed, they are going to reduce their annual fee.
- YTD investment gain- \$167,952. YTD percentage increase - 6.9% Increase from a year ago - 13.7%. Ending value \$2,590,205.
- March 2020 versus March 2021. Performance of portfolio is much healthier.
- Current Allocation of assets are within an ideal risk reward scenario.
- Stocks 67% - Equities - Not felt as aggressive based on risk preference
- Fixed Income – 9% Bonds
- Multi Asset Funds 1.2%
- Cash – 22.8%
- Bonds are 100% investment grade. Short term.

After the Sivilli Group left the meeting, Jesus reviewed the March 2021 financial package circulated to the Board members prior to this meeting and highlighted the following:

#### **Balance Sheet**

- PPP loan provided a significant increase in cash and cash equivalents from year over year.
- There was a significant increase in financial capital campaign cash over the prior year, which means we have been collecting our pledge receivables for the medical respite program.
- Submitted application to repay SBA PPP Loan with Alliance Bank. Waiting for final word

#### **Income statement for the nine months ending March 31, 2021**

- Operating results were described as mixed.
- Highlights included an increase in contributions.



- Posted over half million dollars in contributions in the month of March and that does not include any contributions to medical respite.
- Year to date contributions is approaching \$1.6MM, which is \$400M over projection.
- Govt. Fees and grants are \$242M behind budget: however, the operating shortfall is even worse since a lot of revenues received came out of large contracts related to COVID relief that were not included in the budget.
- A new line item “contributions-medical respite” was added per Howard Richard’s suggestion.
- Medical respite recognized \$364M in new contributions over the 9-month period

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## Executive Committee

The Chair of the Executive Committee brought up the following for consideration. The template for the Board Minutes was circulated for all to look at. Because he is the Secretary, it was agreed that Mark will be taking the minutes of CCS Board meetings beginning with this meeting.

The Chair brought to the attention of the Board members the Authorization to Contract, approval of which was deferred at the Board meeting held several months ago. An updated version was circulated with the notice of this meeting. Howard Richard observed that there were two places in the revised Authorization to Contract where “or the Board” should be added immediately following “approval by the Executive Committee”.

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**After discussion, a motion for Members to approve the revised Authorization to Contract was made, seconded, and unanimously adopted, subject to making the changes suggested by Howard Richard.**

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## Strategic Plan Reviews

- Public Policy Committee Goals & Objectives – *Elena D’Autremont & Chris Ahearn*

Chris said that the Committee decided not to select a subset of goals from the larger list of relevant policy statements of importance developed at the Board Retreat. Instead, the Committee generated a score and ranking system with all issues identified at the Retreat remaining on the list. Chris explained that historically, public policy was driven by a passionate voice on the Committee. In the past public policy initiatives of the Committee worked from bottom up. Individuals are passionate and drive their beliefs forward. Accordingly, the Committee determined that

- A passionate voice would be needed for each issue
- The Public Policy Committee Chair would serve as the traffic cop. If no Committee member shows an interest on a particular issue, she can cull the issue from the list.
- These issues are ongoing, not temporal, and each needs a continuous presence and voice.
- The Committee’s role is to help keep issues visible, support, nudge, coordinate, communicate, and take it to the Board as needed,
- We discussed creating an infrastructure, or platform for advocacy.
- Staff are frequently very engaged and may serve as a “voice”.

- Tony Fonzé suggested creating a way for Board members to report back what action each member had taken about an issue.

Cicely Parseghian said that there may be no need to hold separate new meetings or form subcommittees to deal with public policy issues. Engagement can be by way of small group emails that give alerts and updates on issues that a group is passionate about. Goal is to prepare template action items so clear that it is easy for a board member to act if he/she has a choice.

Anne Morales: asked whether anyone will be monitoring the 503(c)(3) laws regarding lobbying efforts to make sure we are not exceeding that number of hours devoted to lobbying. Richard Koo said that what Chirs and Elena are merely addressing Committee goals today and presumably the Committee will be addressing implementation details later.

## **New Business**

### **• Title VI Plan (Tucson) Review and Approval**

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**After presentation by Teresa Cavendish and some discussion, a motion for Members to approve the Title VI Plan, a copy of which was circulated to the CCS Board members prior to the meeting, was made, seconded, and unanimously adopted.**

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### **• Community Development Block Group Resolution for Medical Respite Program**

Peg Hamon talked about the CARES ACT funds for projects for people experiencing homeless or COVID type issues. Medical respite is perfect fit, so CCS will be applying for \$2.2M in grants. These funds are available on a first come first serve basis.

Anne Morales offered her assistance with the grant.

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**After discussion, a motion for Members to authorize the CEO to apply for a CDBG grant in the amount of \$2.2M for the CCS Medical Respite Program was made, seconded, and unanimously adopted.**

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## **Administrative Report – Peg Harmon**

### **• Pio Decimo Center Executive Director**

- George Rushing starts Monday May 3<sup>rd</sup>, 2021
- Peg gave a summary of his qualifications.
- Richard Koo expressed great appreciation for Marcia Zerler's years of service.
- Cathy will have some suggestions how we can thank Marcia and suggested that the 75th anniversary of Pio might be a good time to recognize Marcia publicly and to give her a gift card of at least \$1,000.

## **COVID-19-Related Matters**

- Eviction prevention programs. Two have been added. Opportunities will be run through Pio Decimo Center.
- Vaccination clinics have been set up for employees and clients. Focus on our deaf clients. Had about 200 appts, but about 80 showed up.
- We encourage our employees to participate in the vaccination drive. Programs are re-opening. Things are getting better.
- **Medical Respite Program:**
  - Howard Richard is helping with the ground lease at the Center of Opportunity.
  - Our architects are working with county in redrawing the site plans, Peg is communicating with both sets of parties.,
  - Peg gave us a description of the Center of Opportunity.
- **Corporate Campus/PCC:**

Appraiser did on-site walk through as a part of the process for the appraisal. We are waiting for the next communication on this from PCC. Should take 2-3 weeks.
- **Casa Alitas – Teresa Cavendish**
  - Increasing numbers and getting larger wave of folks over next few weeks.
  - Tucson BP sector and Yuma BP sector is where they are arriving from.
  - Pima County will be allocating FEMA funds that will give us 3 months advance for our work at Casa Alitas
  - Funding reimbursement request has been submitted.  
Maryann Hockstand asked what types of donations does Casa Alitas need? Clothing? Teresa responded  
” Only new clothing. No used clothing.”
- **Agency Reports and Requests – Executive Directors**

Evita Mendez Counts – working on getting on a lot of people vaccinated.

CCS Yuma continues with its 60/60 fundraising campaign.

### **Adjournment**

With no further business to discuss, on motion made, seconded and adopted, the Chair adjourned the meeting at 9:11 a.m.

**[EXECUTIVE SESSION: The members moved into Executive Session.]**

The next Meeting of the CCS Board is scheduled to be held on May 26, 2021, starting at 7:30 a.m.

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Secretary of the Meeting