Title VI Implementation Plan

Arizona Center for the Blind and Visually Impaired

01/07/2026-01/06/2029

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Arizona Center *for the* Blind *and* Visually Impaired 3100 E Roosevelt St, Phoenix, AZ, 85008 602-273-7411 acbvi.org

Title VI Policy Statement

The Arizona Center for the Blind and Visually Impaired, Inc. (ACBVI) 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 ACBVI sponsored program or activity. There is no distinction between the sources of funding.

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

When ACBVI distributes Federal-aid funds to another entity/person, ACBVI will ensure all subrecipients fully comply with ACBVI’s Title VI Nondiscrimination Program requirements. The Executive Director has delegated the authority to Megan Viesselman, Chief of Staff/Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Steve Tepper, Executive Director

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Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Arizona Center for the Blind and Visually Impaired

ACBVI 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 ACBVI.

For more information on ACBVI's civil rights program, and the procedures to file a complaint, contact Megan Viesselman at 602-273-7411 (ext 117); email mviesselman@acbvi.org; or visit our administrative office at 3100 E Roosevelt St, Phoenix, AZ 85008. For more information, visit acbvi.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 our Office at (602) 273-7411.
Para información en Español llame: (602) 273-7411.

The above notice is posted in the following locations: ACBVI Office: 3100 E Roosevelt St, Phoenix, AZ 85008, agency website, and transit vehicles. This notice is posted online at acbvi.org.

Title VI Complaint Procedure

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 Arizona Center for the Blind and Visually Impaired (ACBVI) 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 ACBVI 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 ACBVI or submitted to the State or Federal authority for guidance.

7. ACBVI 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. ACBVI 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 ACBVI 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: acbvi.org

Title VI Complaint Form

1 Personal Information · *Informacion personal*

This part is about you. Please enter your personal information, regardless if you are filing for someone else.
Esta parte es sobre ti. Por favor introduzca su informacion personal, sin importar si es para para otra persona.

name · *nombre*

email · *correo electronico*

address · *dirección*

city, state, zip · *ciudad, estado, codigo postal*

telephone (home) · *teléfono (casa)*

telephone (work) · *teléfono (trabajo)*

accessible format requirements? · *¿requisitos de formato accesible?*

☐ large print · *letra grande* ☐ TDD · *dispositivo de telecomunicaciones para sordos*
☐ audio recording · *grabación de audio* ☐ other · *otra*

are you filling out this form for someone else? · *¿está completando este formulario para otra persona?*

☐ yes · *sí* (if yes, skip to next section · *en caso afirmativo, pase a la siguiente sección*)

☐ no · *no*

have you obtained the permission to file from the person listed above? · *¿ha obtenido el permiso para presentar de la persona mencionada anteriormente?* ☐ yes · *sí* ☐ no · *no*

name and **relationship** of the person for whom you are filing this complaint · *nombre y parentesco de la persona por la cual está presentando esta queja*

please explain why you are filing for this person · *por favor explique por qué está presentando una solicitud para esta persona*

2 Offender Information · *Información sobre el delincuente*

This part is about the person and agency who you believe discriminated against you.
Esta parte es sobre la persona y la agencia que usted cree que lo discriminó.

name of agency you believe commited discrimination · *nombre de la agencia que cree que cometió discriminación*

location · *ubicación*

name of person complaint is against · *nombre de la persona en contra de la queja*

telephone (if available) · *teléfono (si está disponible)*

3 Discrimination Information · *Información sobre discriminación*

This part is about the discrimination you believe you have experienced.
Esta parte trata sobre la discriminación que cree haber experimentado.

I believe the discrimination was based on (check all that apply): · *Creo que la discriminación se basó en (marque todo lo que corresponda):*

☐ race · *raza* ☐ color · *color* ☐ national origin · *origen nacional*

date of occurance · *fecha de ocurrencia*

mm / dd / yyyy

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.
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si se conocen), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.

4 Complaint History · *Historial de quejas*

This part is about the discrimination complaint listed in this document.
Esta parte trata sobre la queja por discriminación que se menciona en este documento.

have you previously filed a Title VI complaint with this agency? · *¿ha presentado previamente una queja del Título VI con esta agencia?* ☐ yes · *sí* ☐ no · *no*

if yes, provide reference information regarding that complaint · *en caso afirmativo, proporcione información de referencia con respecto a esa queja*

have you filed this complaint with any other federal, state, or local agency, or with any federal or state court?
¿ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?

☐ yes · *sí* ☐ no · *no*

if yes, check all that apply ·
en caso afirmativo, marque todo lo que corresponda

☐ state court · *corte estatal*
☐ state agency · *agencia del estado*
☐ local agency · *agencia local*
☐ federal court · *corte federal*
☐ federal agency · *agencia federal*

please provide contact information for the person(s) at the agency(ies) indicated ·
proporcione la información de contacto de la(s) persona(s) en la(s) agencia(s) mencionada(s)

name · *nombre* title · *titulo* agency · *agencia*

address · *dirección* telephone · *teléfono*

5 Signature and Date · *Firma y fecha*

signature · *firma*

date · *fecha*

please submit this form in person or mail · *envíe este formulario en persona o envíe este por correo a:* **ACBVI, ATTN TITLE VI, 3100 E Roosevelt St, Phoenix, AZ 85008** 602-273-7411

A copy of this form can be found online at acbvi.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

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

ACBVI has not had any Title VI complaints, investigations, or lawsuits during the review period 2022-2025. (Each review period start date is the date of board of director approval)

Public Participation Plan

Notifying the Public of Rights Under Title VI

Arizona Center for the Blind and Visually Impaired

ACBVI is engaging the public (its clients) in its planning and decision-making processes. Clients will be invited to participate in the process through meetings and surveys. As an agency receiving federal financial assistance, ACBVI will make the following outreach efforts in the upcoming year:

- Individuals who have utilized ACBVI's transportation services will be invited to complete an anonymous survey regarding their experience with us. The survey will include a field for open-ended feedback and suggestions for our transportation program. This survey will be distributed at least twice a year.

- All ACBVI clients will be invited to complete a survey regarding their experiences with public transportation in general. The survey will include a field for open-ended responses on what their ideal transportation experience would entail. This survey will be distributed at least once a year.

- All ACBVI clients will be invited to participate in a public meeting regarding ACBVI's transportation services. These meetings will be held at least twice a year.

    - Public meetings are scheduled during clients' regularly scheduled programming to increase the opportunity for attendance by clients. This will ensure that clients will not have conflicts with other classes.

    - Public meetings are held at ACBVI to ensure the meetings are accessible to our clientele.

ACBVI submits to the City of Phoenix annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

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Title VI Limited English Proficiency Plan

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

Safe Harbor Provision

ACBVI 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

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Non-elected Committees Membership

ACBVI does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

ACBVI does not have subrecipients and, as such, does not have any monitoring procedures.

Title VI Equity Analysis

A sub recipient planning to acquire land which displaces persons from their residences and businesses 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.

ACBVI has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have ever been developed by this organization.

Board Approval for the Title VI Program

Motion: The Board of the Arizona Center for the Blind and Visually Impaired, Inc. give our Executive Director, Steve Tepper the authority to implement the Title VI Plan on behalf of the agency. Board voted by email between 1/2/2026 and 1/6/2026.

Board Member Votes:

- Adam Zimmerman - Approve
- Brian Barry - Approve
- Chris Rudolph - Approve
- Dave Schad - Approve
- David DeCero - Approve
- David Steinmetz - Approve
- David Armstrong - Approve
- James Hunt - Approve
- Jayson Meyerovitz - Approve
- Joyce Van Cott - Approve
- Khara Fuentes - Approve
- Leah Powell - Approve
- Mandy Carlsen - Abstain
- Matthew Gerst - Approve
- Riann Balch - Approve
- Steve Welker - Approve