Title VI Implementation Plan
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Executive Summary

The Senior Companion Program (SCP) is sponsored by Northern Arizona University's Civic Service Institute, (CSI@NAU) whose mission is to mobilize generations to strengthen communities through service and volunteerism. SCP specifically enables those age 55 and over and with limited incomes to serve as volunteer Senior Companions and provide supportive individualized services such as transportation, companionship, personal care, home management, information and advocacy, and respite care to help adults age 50+ with special needs (homebound and/or disabled) maintain their dignity and independence. SCP operates in Coconino, Maricopa, Mohave, Navajo, and Yavapai Counties and typically serves 500-600 clients.

CSI@NAU's SCP has provided demand response type transportation services in Northern Arizona since 1985 and in Maricopa County since 2008. CSI@NAU has received funding through the ADOT 5310 Program since 2011. SCP increases transportation opportunities for older adults and individuals with disabilities beyond the requirements of the ADA by providing door through door service and more. SCP offers transportation to those identified clients, through more than 50 partner agencies, that have been scheduled with Senior Companion volunteers on a recurring basis. SCP policy states that when they are serving a client, volunteers are to be with that client at all times. For instance, they must assist the client in shopping, not just wait outside the grocery store; they must assist the client into a medical facility and wait within that facility for the client's appointment to be over. They provide assistance with walking, getting in and out of the vehicle, and assistance beyond the vehicle (getting groceries from the shelf to the cart and putting groceries away once back at the client's home).

CSI@NAU is housed in the College of Social and Behavioral Sciences and the main office is located on the Flagstaff Campus. Program staff live in the communities served such as Kingman, Prescott, Show Low, and Phoenix.

What type of program fund(s) did you apply for?
☑ 5310
☐ 5311
☐ Other (please explain)______________________________________________________________

Type of Funding Requests? (Select all that apply)
☐ Vehicle Funds
☑ Operating Funds
☐ Other (please explain)______________________________________________________________
Non Discrimination Policy Statement

The Civic Service Institute at Northern Arizona University’s Senior Companion Program (CSI@NAU SCP) policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any CSI@NAU SCP sponsored program or activity. There is no distinction between the sources of funding.

CSI@NAU SCP 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, CSI@NAU SCP will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When CSI@NAU SCP distributes Federal-aid funds to another entity/person, CSI@NAU SCP will ensure all subrecipients fully comply with CSI@NAU SCP Title VI Nondiscrimination Program requirements. The President of Northern Arizona University has delegated the authority to Priscilla Mills, Northern Arizona University’s Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Dr. Rita Cheng, President
Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA
Civic Service Institute at Northern Arizona University
Senior Companion Program

The Civic Service Institute at Northern Arizona University Senior Companion Program (CSI@NAU SCP) operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the CSI@NAU SCP.

For more information on the CSI@NAU SCP’s civil rights program, and the procedures to file a complaint, contact Priscilla Mills, Northern Arizona University Title VI Coordinator, (TTY 928-523-3312); email Priscilla.Mills@nau.edu; or visit our administrative office at Northern Arizona University Equity and Access Office, Old Main, Building 10, Flagstaff, Arizona 86001. For more information about the Senior Companion Program, visit http://nau.edu/SBS/CSI/Programs/Senior-Companion/. For more information about Title VI and filing complaints, visit: http://nau.edu/Equity-and-Access/home/.

A complainant may file a complaint directly with the Arizona Department of Transportation or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: ADOT Civil Rights Office: ATTN: Title VI Coordinator, 206 S. 17th Ave, Room 183 Mail Drop 155A Phoenix, AZ 85007 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 (928) 523-3312. Para información en Español llame: (928) 523-3312.
Aviso Público Sobre los Derechos Bajo el Título VI Y ADA
Civic Service Institute at Northern Arizona University
Senior Companion Program

El Civic Service Institute at Northern Arizona University Senior Companion Program (CSI@NAU SCP) (y sus subcontractistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la CSI@NAU SCP programa de derechos civiles, y los procedimientos para presentar una queja, contacte Priscilla Mills, Northern Arizona University Title VI Coordinator, (TTY 928-523-3312); email Priscila.Mills@nau.edu; o visite nuestra oficina administrativa en Northern Arizona University Equity and Access Office, Old Main, Building 10, Flagstaff, Arizona 86001. Para obtener más información, visite: http://nau.edu/Equity-and-Access/home/.

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 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:
- CSI@NAU Senior Companion Office

This notice is posted online at www.nau.edu/sbs/csi/Programs/Senior-Companion/.

6 Non Discrimination Notice to the Public -Spanish | Title VI Implementation Plan
Non Discrimination Complaint Procedures

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

1. Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency’s Title VI Complaint Form. Because CSI@NAU SCP is part of Northern Arizona University, Title VI complaints will be handled by the Northern Arizona University Equity and Access Office.

2. Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.

3. Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.

4. Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.

5. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.

6. Once submitted the Northern Arizona University Equity and Access Office 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 Northern Arizona University Equity and Access Office or submitted to the State or Federal authority for guidance.

7. The Northern Arizona University Equity and Access Office will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
(8) The Northern Arizona University Equity and Access Office has 30 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 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 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

(9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

(10) A copy of either the closure letter or LOF must be also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.

(11) A complainant dissatisfied with the Northern Arizona University Equity and Access Office may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT**: ATTN ADA/Title VI Program Coordinator 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

(12) A copy of these procedures can be found online at:

www.nau.edu/sbs/csi/Programs/Senior-Companion
http://nau.edu/equity-and-access/home
## Discrimination Complaint Form

### Section I:

<table>
<thead>
<tr>
<th>Name:</th>
<th>Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone (Home):</td>
<td>Telephone (Work):</td>
</tr>
<tr>
<td>Electronic Mail Address:</td>
<td></td>
</tr>
</tbody>
</table>

### Accessible Format Requirements?
- ☐ Large Print
- ☐ Audio Tape
- ☐ TDD
- ☐ Other

### Section II:

Are you filing this complaint on your own behalf?  
- ☐ Yes*  
- ☐ No  

*If you answered “yes” to this question, go to Section III.

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.  
- ☐ Yes  
- ☐ No

### Section III:

I believe the discrimination I experienced was based on (check all that apply):

- ☐ Race  
- ☐ Color  
- ☐ National Origin  
- ☐ Disability

Date of Alleged Discrimination (Month, Day, Year):  

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

### Section VI:

Have you previously filed a Discrimination complaint with this agency?  
- ☐ Yes  
- ☐ 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:

Northern Arizona University, Title VI Coordinator, Access and Equity Office
Old Main, Building 10
PO Box 4083
Flagstaff, AZ 86011
(928) 523-3312  or  Equity and acces@nau.edu

A copy of this form can be found online at
www.nau.edu/sbs/csi/Programs/Senior-Companion  or  http://nau.edu/equity-and-access/home
Discrimination Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

<table>
<thead>
<tr>
<th>Description/Name</th>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, national origin or disability)</th>
<th>Status</th>
<th>Action(s) Taken (Final findings?)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complaints</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CSI@NAU SCP has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2015 or 2016.
CSI@NAU SCP is a federally funded program overseen by the Corporation for National and Community Service (CNCS) that is sponsored by Northern Arizona University (NAU). As such, it complies with CNCS policies and procedures as well as those of NAU and other funders, such as FTA. SCP is not a public transit provider; SCP engages volunteer drivers who provide rides to assigned clients utilizing their personal vehicles. The clients are matched with the Senior Companion volunteers for door-through-door assistance on an agreed upon schedule.

SCP solicits feedback and comments from partner agencies, clients, funders, and volunteers for ideas on how to improve the existing service provided by the Senior Companion volunteers. The feedback is requested through annual surveys to partner agencies, volunteers and clients, meetings and site visits from funders, and occasional site visits to partner agencies.

CSI@NAU SCP submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

In addition, CSI@NAU SCP works with a Community Engagement Committee that also provides information and feedback regarding the services we provide.

In the upcoming year CSI@NAU SCP will make the following community outreach efforts:

- Monthly In-Service Training events in Show Low, Flagstaff, Cottonwood, Prescott, Phoenix, and Kingman in which potential volunteers or the public are invited to attend to learn more about SCP. These events are held the last Thursday or Friday of the month depending on the location.
- Attendance at volunteer recruitment events and fairs throughout service area.
- Periodic volunteer recruitment events or speaking engagements throughout service area depending on volunteer numbers in a given region. Examples of locations include senior housing centers, libraries, non-profits, and schools. These events are advertised through fliers, email, and word of mouth and are open to the public.
CSI@NAU SCP 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 CSI@NAU SCP 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 CSI@NAU SCP’s extent of obligation to provide LEP services, the CSI@NAU SCP 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 CSI@NAU SCP service area who may be served or likely to encounter by CSI@NAU SCP program, activities, or services;

**LEP Analysis for Flagstaff Service Area**

<table>
<thead>
<tr>
<th>Persons with Limited English Proficiency (LEP)</th>
<th>Estimate</th>
<th>% of Persons 5 Yrs. &amp; Over</th>
<th>% of Persons 5 Yrs. &amp; Over with LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons 5 years &amp; Over</td>
<td>63,548</td>
<td>100.0%</td>
<td></td>
</tr>
<tr>
<td>English Speaking Only</td>
<td>51,855</td>
<td>81.6%</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>3,241</td>
<td>5.1%</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish with LEP</td>
<td>2,084</td>
<td>3.3%</td>
<td>64.3%</td>
</tr>
<tr>
<td>Other Indo-European languages with LEP</td>
<td>211</td>
<td>0.3%</td>
<td>6.5%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island languages with LEP</td>
<td>582</td>
<td>0.9%</td>
<td>17.9%</td>
</tr>
<tr>
<td>Other Languages with LEP</td>
<td>371</td>
<td>0.6%</td>
<td>11.5%</td>
</tr>
</tbody>
</table>

**LEP Analysis for Navajo County Service Area**

Pinetop-Lakeside, Show Low, Snowflake, Taylor

<table>
<thead>
<tr>
<th>Persons with Limited English Proficiency (LEP)</th>
<th>Estimate</th>
<th>% of Persons 5 Yrs. &amp; Over</th>
<th>% of Persons 5 Yrs. &amp; Over with LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons 5 years &amp; Over</td>
<td>22,889</td>
<td>100.0%</td>
<td></td>
</tr>
<tr>
<td>English Speaking Only</td>
<td>20,467</td>
<td>89.4%</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>379</td>
<td>1.7%</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish with LEP</td>
<td>201</td>
<td>0.9%</td>
<td>53.0%</td>
</tr>
</tbody>
</table>
### LEP Analysis for Yavapai County Service Area
Lake Havasu City, Prescott, Chino Valley, Sedona, Cottonwood

<table>
<thead>
<tr>
<th>Persons with Limited English Proficiency (LEP)</th>
<th>Estimate</th>
<th>% of Persons 5 Yrs. &amp; Over</th>
<th>% of Persons 5 Yrs. &amp; Over with LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons 5 years &amp; Over</td>
<td>106,570</td>
<td>100.0%</td>
<td></td>
</tr>
<tr>
<td>English Speaking Only</td>
<td>93,990</td>
<td>88.2%</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>4,342</td>
<td>4.1%</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish with LEP</td>
<td>3,601</td>
<td>3.4%</td>
<td>82.9%</td>
</tr>
<tr>
<td>Other Indo-European languages with LEP</td>
<td>385</td>
<td>0.4%</td>
<td>8.9%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island languages with LEP</td>
<td>196</td>
<td>0.2%</td>
<td>4.5%</td>
</tr>
<tr>
<td>Other Languages with LEP</td>
<td>168</td>
<td>0.2%</td>
<td>3.9%</td>
</tr>
<tr>
<td>Other Indo-European languages with LEP</td>
<td>76</td>
<td>0.3%</td>
<td>20.1%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island languages with LEP</td>
<td>56</td>
<td>0.2%</td>
<td>14.8%</td>
</tr>
<tr>
<td>Other Languages with LEP</td>
<td>45</td>
<td>0.2%</td>
<td>11.9%</td>
</tr>
</tbody>
</table>

### LEP Analysis for Mohave County Service Area
Lake Havasu City, Bullhead City, Kingman

<table>
<thead>
<tr>
<th>Persons with Limited English Proficiency (LEP)</th>
<th>Estimate</th>
<th>% of Persons 5 Yrs. &amp; Over</th>
<th>% of Persons 5 Yrs. &amp; Over with LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons 5 years &amp; Over</td>
<td>114,677</td>
<td>100.0%</td>
<td></td>
</tr>
<tr>
<td>English Speaking Only</td>
<td>101,387</td>
<td>88.4%</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>5,033</td>
<td>4.4%</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish with LEP</td>
<td>4,188</td>
<td>3.7%</td>
<td>83.2%</td>
</tr>
<tr>
<td>Other Indo-European languages with LEP</td>
<td>198</td>
<td>0.2%</td>
<td>3.9%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island languages with LEP</td>
<td>597</td>
<td>0.5%</td>
<td>11.9%</td>
</tr>
<tr>
<td>Other Languages with LEP</td>
<td>118</td>
<td>0.1%</td>
<td>2.3%</td>
</tr>
</tbody>
</table>
For these service areas, according to the U.S. Census Bureau, 2010-2014, American Community Survey five year estimates, the predominate language spoken by the LEP population is Spanish. Under the DOJ’s Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than “very well”. **CSI@NAU SCP** translates vital documents, forms and public notices to meet this requirement.

Under a separate grant, the Senior Companion Program also operates in the following metropolitan Phoenix areas:

**LEP Analysis for Maricopa County Service Area**
Phoenix, Tempe, Scottsdale, Peoria, Paradise Valley, Gilbert, Glendale, Mesa, Fountain Hills, Chandler

<table>
<thead>
<tr>
<th>Persons with Limited English Proficiency (LEP)</th>
<th>Estimate</th>
<th>% of Persons 5 Yrs. &amp; Over</th>
<th>% of Persons 5 Yrs. &amp; Over with LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons 5 years &amp; Over</td>
<td>3,001,138</td>
<td>100.0%</td>
<td></td>
</tr>
<tr>
<td>English Speaking Only</td>
<td>2,165,623</td>
<td>72.2%</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>313,729</td>
<td>10.5%</td>
<td>100.0%</td>
</tr>
<tr>
<td>Spanish with LEP</td>
<td>243,870</td>
<td>8.1%</td>
<td>77.7%</td>
</tr>
<tr>
<td>Other Indo-European languages with LEP</td>
<td>19,008</td>
<td>0.6%</td>
<td>6.1%</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island languages with LEP</td>
<td>33,838</td>
<td>1.1%</td>
<td>10.8%</td>
</tr>
<tr>
<td>Other Languages with LEP</td>
<td>12,574</td>
<td>0.4%</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

For this service area, according to the U.S. Census Bureau, 2010-2014, American Community Survey five year estimates, by far the most predominate language spoken by the LEP population is Spanish. The next four languages with the most LEP populations are Chinese, Vietnamese, Arabic, and Tagalog.

**Languages with 1,000 or more LEP Speakers Maricopa**
Phoenix, Tempe, Scottsdale, Peoria, Paradise Valley, Gilbert, Glendale, Mesa, Fountain Hills, Chandler

<table>
<thead>
<tr>
<th>Total Speakers</th>
<th>Total LEP</th>
<th>% of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>3,001,138</td>
<td></td>
</tr>
<tr>
<td>Speak only English</td>
<td>2,165,011</td>
<td></td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>639,767</td>
<td>8.3%</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>9,158</td>
<td>0.1%</td>
</tr>
</tbody>
</table>
German  10,215 | 1,280 | 0.0%
Russian  4,917 | 1,514 | 0.1%
Serbo-Croatian  7,130 | 2,783 | 0.1%
Persian  5,161 | 2,098 | 0.1%
Hindi  7,102 | 1,004 | 0.0%
Chinese  19,093 | 9,336 | 0.3%
Japanese  3,337 | 1,209 | 0.0%
Korean  6,663 | 3,100 | 0.1%
Thai  1,869 | 1,148 | 0.0%
Vietnamese  15,031 | 8,832 | 0.3%
Tagalog  13,518 | 3,946 | 0.1%
Navajo  7,995 | 1,197 | 0.0%
Arabic  13,871 | 5,135 | 0.2%

2) The frequency with which LEP individuals come in contact with CSI@NAU SCP services;

Overall, CSI@NAU SCP receives infrequent requests for information or services in languages other than English or Spanish. A 2016 survey of the four program staff who deal directly with volunteers and clients revealed that two had received no requests for information or materials, one had received requests for Spanish and one had received requests for Spanish, Chinese, Japanese and Russian. CSI@NAU SCP will periodically re-survey its staff and volunteers to determine the nature of requests for language assistance and modify its LEP practices accordingly.

3) The nature and importance of the program, activities or services provided by the CSI@NAU SCP to the LEP population; and

The Senior Companion Program (SCP) is a service initiative for people age 55 or older to provide assistance and friendship to elderly, homebound individuals. Senior Companions provide the services that the elderly need to live independently, including: taking care of simple chores, providing transportation to medical and other appointments and outings and offering contact to the outside world. The services provided by CSI@NAU SCP are important to the individuals we serve, but are not emergency or crisis related. The services are provided one-on-one by volunteers. The level of spoken language communication required to accomplish the services is not high. For example, for medical transportation services, a client could show the volunteer an appointment card from the doctor’s office showing the date, time and location of the appointment.

4) The resources available to CSI@NAU SCP and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Due to fiscal constraints and limited resources at this time, CSI@NAU SCP is best able to provide interpretation and translation services with advance notice. Non-vital documents are not available
in languages other than English. However, public notices, if any, and vital documents and forms are available in English and Spanish. CSI@NAU SCP is committed to providing language services and will accommodate reasonable requests for translation within available resources. It has a limited budget and the service providers are volunteers. CSI@NAU SCP will seek out effective, low-cost alternatives as described in the section below, and will use fee-based services as needed. Where possible, CSI@NAU SCP will use qualified staff and volunteers to provide language assistance. CSI@NAU SCP will have vital documents translated in writing when required or requested. To accomplish its LEP goals, CSI@NAU SCP draws on resources from the communities it serves, Internet resources and on its association with a public university. The following types of resources are available for use by CSI@NAU SCP staff to assist volunteers and clients: “I Speak Cards,” online translation tools, fee based phone interpreting services, and multi-lingual glossaries.

A statement in Spanish, where needed, will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

**Safe Harbor Provision**

CSI@NAU SCP 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
Non-elected Committees Membership Table

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

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

<table>
<thead>
<tr>
<th>Body</th>
<th>Caucasian</th>
<th>Latino</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>TYPE %</td>
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<tr>
<td>TYPE THE NAME OF THE COMMITTEE HERE</td>
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<td>TYPE %</td>
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<tr>
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<td>TYPE %</td>
<td>TYPE %</td>
</tr>
<tr>
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<td>TYPE %</td>
<td>TYPE %</td>
<td>TYPE %</td>
<td>TYPE %</td>
</tr>
</tbody>
</table>

CSI@NAU SCP does NOT select the membership of any transit-related committees, planning boards, or advisory councils.
CSI@NAU SCP does not have subrecipients for FTA funds and therefore this section does not apply.
Title VI Training

Training received by Senior Corps Programs Project Director, Erin Kruse:
- Title VI training presented at the ADOT 2016-5310 Program workshop in Flagstaff, Arizona on February 25, 2016

Title VI trainings Completed by Northern Arizona University Title VI Compliance Officer Priscilla Mills:
- Title VI training presented at the ADOT 2016-5310 Program workshop in Flagstaff, Arizona on February 25, 2016.
- US Department of Justice Programs, Office for Civil Rights - Training for Grantees. June, 2016. This course is presented by the Arizona Criminal Justice Commission, and fulfills the civil rights training requirements for federal grantees established by the Office of Justice Programs, Office for Civil Rights.
- Various webinars and conference on equal opportunity and affirmative action programs which have had a Title VI specific component.
Title VI Equity Analysis

The CSI@NAU SCP has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been built.
Board Approval for the Title VI Program

Office of the President
Northern Arizona University
PO Box 4062
Flagstaff, AZ 86011-4062
928-523-3232
928-523-1848 fax
neu.edu/president

April 26, 2016

To whom it may concern:

I approve the foregoing Title VI Plan for the Civic Service Institute at Northern Arizona University’s Senior Companion Program.

Sincerely,

[Signature]

Joanne Keene
Executive Vice President and Chief of Staff
Northern Arizona University
Organizational Chart

Civic Service Institute Organizational Chart