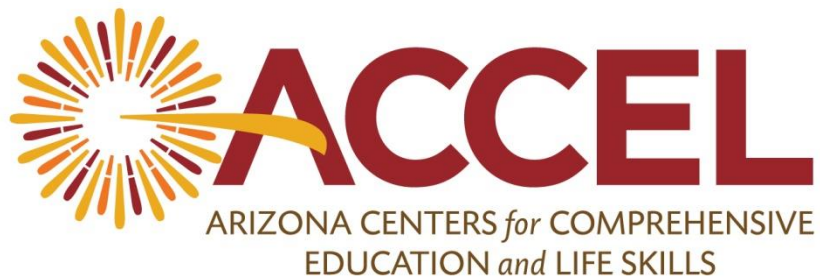


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# *Title VI Implementation Plan*

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October 1, 2021-November 30,2023

**Title VI Contact:** Kay S. Moore, Director of ACCEL Adult Services  
**Title VI Contact Phone:** 602-997-2331  
**Title VI Contact Email:** [kmoore@accel.org](mailto:kmoore@accel.org)  
**Alternate Language Phone:** 602-997-2331  
**Address:** Physical: 3310 W Cheryl Dr. Bldg C-100 Phx, AZ 85051  
**Mailing Address:** 10251 N 35<sup>th</sup> Ave. Phoenix, AZ 85051  
**Web Address:** [www.accel.org](http://www.accel.org)  
**Para Información en Español:** Elias Rivas, 602-997-2331

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# Executive Summary

## **Mission Statement**

ACCEL's mission is to provide exceptional educational, therapeutic, behavioral, and vocational programs to individuals with special needs, to give them the necessary skills to learn, to work, and to live successfully with dignity and independence.

ACCEL serves approximately 250 students and 108 adults with severe autism and multiple disabilities. The students are served on behalf of Tempe and other Phoenix area school districts unable to serve them in district programs due to the severity of their disabilities. Students attend ACCEL at no cost to their parents, 53% are minority students and 58% receive free or reduced school lunch. ACCEL also provides job training and day programming for approximately 108 adults, primarily funded by Arizona Department of Economic Security, Division of Developmental Disabilities. Ninety-seven percent (97%) of adults served receive Title XIX services for adults with low income.

## **A Vision Statement - 2022**

It's no longer a secret: ACCEL is making an impressive impact in the special needs community. We care about people, and we care about what is at the heart of the issues for those who have special needs and their families. We care about our mission and vision and it is central to all of our actions and communications. We have cast aside any concern that pulled us away from our purpose and streamlined our staff, our processes, and our value delivery vehicles.

The result has been a dramatic shift in the quality of special needs assistance that has set the bar for the industry. This standard has people paying attention - even our competitors have had to adapt to this elevated model or be passed by. We take pride in setting higher standards for care and challenge ourselves to keep finding creative ways to get the job done as effectively and efficiently as possible, with our community partners and all ACCELers being at the core of those innovations. The ACCEL name has become synonymous with Excellence, Innovation and Disruption. The focus on what really matters creates a powerful relationship and dynamic with school administrators and directors that aligns our interests with that of what is best for the community. There is an emergence of peace and collaboration that has swept over the whole of the operation. As long as we keep doing the right thing, one thing at a time, we will change the industry to where it needs to be. Not just here. Everywhere.

Our staff is a mission-oriented group who loves to be a part of something special. Purposeful Energy is a tenant that is at the heart of what our team is all about. People on our team are not happy with just status quo. We are out to make an incredible impact in our community, turn over the apple cart and rock the boat. We challenge each other to that end and pull for each other's success. We know much rides on what we create together and take it seriously, always coming back to our vision. At the same time, we enjoy each other's company. We live the mission that we are on but never forget that we are also some of the people we intend to impact in a positive way. We are here to support each other and challenge one another to crash through obstacles and expectations just as we empower our students to do. There is a playfulness to our staff that is infectious. People want to play on our teams. We value our individual and corporate integrity and, utmost, honesty.

We are fully utilizing our three main campuses and have five *extension* programs in Maricopa County. We are serving 100 early intervention clients and are graduating them into district kindergartens every year. We are serving 300 adult clients through community-based vocational programs. We are advocating for those we serve at the City, State and Federal levels to make sure we exact real and lasting change. We excel in bringing together numerous funders from the public and private sectors to

responsibly fund our ambitions. We are working with the Ministry of Education and other key stakeholders to develop a strong Special Education Infrastructure throughout the Kingdom of Saudi Arabia to continue making services accessible to individuals for the first time in their lives. We are serving individuals who have emotional disabilities. We are nurturing a talent pipeline that starts includes high schools, community colleges and universities across the region.

The individuals we serve and their families deserve the best opportunities possible. They deserve a chance to reach their potential. We require the most talented people to realize this vision. We require the assistance, guidance and execution of our empowered team and will settle for nothing less than excellence. We are the international standard of services for individuals who have special needs.

We do what is right by our community - eliminating what is unnecessary in the system and we are unapologetically committed to pursuing what we know to be right, even if it is not in our best interest.

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

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

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

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

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

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

# Non Discrimination Notice to the Public

## Notifying the Public of Rights Under Title VI ACCEL

ACCEL operates its programs and services without regard to race, color, & 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 ACCEL.

For more information on ACCEL's civil rights program, and the procedures to file a complaint, contact Gordon Comfort: 602.995.7366 or email [gcomgort@accel.org](mailto:gcomgort@accel.org); or visit our administrative office at 10251 N. 35<sup>th</sup> Avenue, Phoenix, AZ 85051. For more information, visit [www.accel.org](http://www.accel.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. 1<sup>st</sup> Ave., Suite 900, Phoenix AZ 85003 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 602-997-2331. Para información en Español llame: Juana Rodriguez, 602-997-2331.

# Non Discrimination Notice to the Public - Spanish

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## Aviso al Público Sobre los Derechos Bajo el Título VI ACCEL

ACCEL (*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 ACCEL's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Gordon Comfort, 602.995.7366, or [GComfort@accel.org](mailto:GComfort@accel.org); contacte Juana Rodriguez en Español, 602-997-2331, o visite nuestra oficina administrativa en 10251 N. 35<sup>th</sup> Avenue, Phoenix, AZ 85051. Para obtener más información, visite [www.accel.org](http://www.accel.org)

El puede presentar una queja directamente con City of Phoenix Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN Title VI Coordinator 302 N. 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

This notice is posted online at [www.accel.org](http://www.accel.org)

# Title VI Complaint Procedures

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

Someta la forma y cualquier información adicional a:

ACCEL Chief Operating Officer  
Gordon Comfort  
10251 N 35<sup>th</sup> Ave.  
Phoenix, AZ 85051  
602.995.7366

Forms & instructions can be found: [City of Phoenix-Valley Metro Complaint Procedures.pdf](#)

The complainant will be contacted by the Chief Operating Officer and the proposed resolution will be provided to the complainant within 60 days. If the complainant wishes to appeal the decision, the complainant may contact Ray Damm, ACCEL CEO, at 602-995-7366.

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  
101 N 1st St # 1300  
Phoenix, AZ 85007 · (602) 253-5000

Or: [Phoenix Public Transit Title VI Complaint Form](#) (English)  
[TÍTULO VI, FORMULARIO DE QUEJA DE TRANSPORTE PÚBLICO \(phoenix.gov\)](#) (Spanish)

**FTA:** ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE  
Washington DC 20590.

If information is needed in another language, contact 602-997-2331. Para información en Español llame:  
Elias Rivas, 602-997-2331.

- 1) **ACCEL** will notify the Title VI Coordinator of discrimination complaints.
- 2) **ACCEL** has **30** business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has **30** 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.

- 3) 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.
- 4) A copy of either the closure letter or LOF must also be submitted to Title VI Coordinator of discrimination complaints. Letters may be submitted by hardcopy or email.
- 5) A complainant dissatisfied with **ACCEL** decision may file a complaint with the City of Phoenix or the Federal Transit Administration (**FTA**) offices of Civil Rights: City of Phoenix: ATTN: Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- 6) A copy of these procedures can be found online at: **[www.accel.org](http://www.accel.org)**.

If information is needed in another language, contact . \*Para información en Español llame: **Elias Rivas, 602-997-2331**

# 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.		
<hr/> <hr/> <hr/>		
<b>Section VI:</b>		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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

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**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes       No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court: \_\_\_\_\_  State Agency: \_\_\_\_\_

State Court : \_\_\_\_\_  Local Agency: \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI:**

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint.

Your signature and date are **required** below:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

**ACCEL**

**Title VI Contact: Kay S. Moore, Director of ACCEL Adult Services**

**3310 W Cheryl Dr. Bldg C-100 Phx, AZ 85051**

**TITLE VI CONTACT PERSON PHONE NUMBER HERE 602-997-2331**

**kmoore@accel.org**

A copy of this form can be found online at **www.accel.org**

If information is needed in another language, contact . \*Para información en Español llame: **Elias Rivas, 602-997-2331**

# Title VI Investigations, Complaints, and Lawsuits

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

**ACCEL** has not had any Title VI Discrimination complaints, investigations, or lawsuits in 2018, 2019, 2020 or **2021**..

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

# Public Participation Plan

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ACCEL is engaging stakeholders in its transportation planning and decision-making processes. Stakeholders will be invited to participate in the process whether through meetings or surveys. As an agency receiving federal financial assistance, ACCEL made the following community outreach efforts:

Through the ISP (Individual Service Plan) process, ACCEL discusses transportation with each member and any responsible party quarterly to determine need. ACCEL also provides every member with contact information to discuss transportation needs and issues.

ACCEL is listed through DES/DDD to provide transportation services and provides information about transportation services to school districts that are within our service area.

In the upcoming year ACCEL will make the following community outreach efforts:

ACCEL will meet with each stakeholder and any responsible party quarterly, or as the need arises.

## 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.

ACCEL 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.

## **\*CHECK ALL THAT APPLY AND REMOVE THOSE THAT ARE NOT APPLICABLE:**

- Expanded the distribution of agency brochures
- Posted the Nondiscrimination Public Notices to the following locations:
  - Lobby of agency

- Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities: [www.accel.org](http://www.accel.org)
- Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

**ACCEL** will make the following community outreach efforts for the **upcoming year**:

**\*CHECK ALL THAT APPLY AND REMOVE THOSE THAT ARE NOT APPLICABLE:**

- Expand the distribution of agency brochures
- Post the Nondiscrimination Public Notices to the following locations:
  - Lobby of service sites, main office, transit vehicles
- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

# Limited English Proficiency Plan

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**ACCEL** 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 **ACCEL** 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.

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. Spanish translation services are available by phone at 602-995-7366 or 602-997-2331.

In developing the plan while determining the **ACCEL**'s extent of obligation to provide LEP services, the **ACCEL** 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 **ACCEL** service area who may be served or likely to encounter by **ACCEL** program, activities, or services;

Arizona	United States	
Label	Estimate	Margin of Error
Total:	308,834,688	±22,314
Speak only English	241,032,343	±213,182
Spanish:	41,757,391	±139,962
Speak English "very well"	25,626,084	±99,478
Speak English less than "very well"	16,131,307	±101,238
French (incl. Cajun):	1,171,775	±28,637
Speak English "very well"	931,300	±23,595
Speak English less than "very well"	240,475	±12,485
Haitian:	924,817	±37,039
Speak English "very well"	600,810	±26,708
Speak English less than "very well"	324,007	±16,899
Italian:	539,546	±16,288
Speak English "very well"	406,590	±14,067
Speak English less than "very well"	132,956	±6,107
Portuguese:	845,801	±30,046
Speak English "very well"	539,939	±21,374



Speak English less than "very well"	305,862	±15,055
German:	895,309	±22,655
Speak English "very well"	760,644	±19,278
Speak English less than "very well"	134,665	±7,383
Yiddish, Pennsylvania Dutch or other West Germanic languages:	560,216	±19,764
Speak English "very well"	398,341	±16,955
Speak English less than "very well"	161,875	±8,968
Greek:	264,066	±11,439
Speak English "very well"	203,830	±10,432
Speak English less than "very well"	60,236	±3,686
Russian:	941,454	±26,758
Speak English "very well"	553,625	±20,272
Speak English less than "very well"	387,829	±15,456
Polish:	510,430	±18,224
Speak English "very well"	325,707	±13,989
Speak English less than "very well"	184,723	±8,488
Serbo-Croatian:	243,232	±15,015
Speak English "very well"	163,520	±11,814
Speak English less than "very well"	79,712	±6,423
Ukrainian or other Slavic languages:	321,876	±16,496
Speak English "very well"	205,747	±11,183
Speak English less than "very well"	116,129	±9,806
Armenian:	236,949	±13,466
Speak English "very well"	141,100	±9,493
Speak English less than "very well"	95,849	±6,936
Persian (incl. Farsi, Dari):	457,102	±18,688
Speak English "very well"	295,751	±15,335
Speak English less than "very well"	161,351	±8,544
Gujarati:	455,292	±15,622
Speak English "very well"	310,845	±12,755

Speak English less than "very well"	144,447	±8,646
Hindi:	892,596	±23,552
Speak English "very well"	734,980	±20,760
Speak English less than "very well"	157,616	±10,562
Urdu:	519,883	±22,606
Speak English "very well"	380,828	±18,700
Speak English less than "very well"	139,055	±9,746
Punjabi:	322,446	±18,921
Speak English "very well"	198,181	±14,025
Speak English less than "very well"	124,265	±8,705
Bengali:	369,115	±19,087
Speak English "very well"	217,499	±12,690
Speak English less than "very well"	151,616	±9,493
Nepali, Marathi, or other Indic languages:	417,486	±20,172
Speak English "very well"	261,001	±12,622
Speak English less than "very well"	156,485	±12,319
Other Indo-European languages:	576,240	±20,790
Speak English "very well"	413,979	±17,693
Speak English less than "very well"	162,261	±8,742
Telugu:	419,768	±18,716
Speak English "very well"	339,995	±15,184
Speak English less than "very well"	79,773	±6,190
Tamil:	293,907	±15,476
Speak English "very well"	247,681	±13,554
Speak English less than "very well"	46,226	±5,620
Malayalam, Kannada, or other Dravidian languages:	266,309	±13,650
Speak English "very well"	213,512	±11,836
Speak English less than "very well"	52,797	±4,644
Chinese (incl. Mandarin, Cantonese):	3,494,544	±37,427

Speak English "very well"	1,675,984	±27,412
Speak English less than "very well"	1,818,560	±24,383
Japanese:	455,003	±17,494
Speak English "very well"	280,023	±13,034
Speak English less than "very well"	174,980	±8,620
Korean:	1,075,247	±26,688
Speak English "very well"	527,025	±15,707
Speak English less than "very well"	548,222	±17,317
Hmong:	230,270	±12,483
Speak English "very well"	145,493	±10,549
Speak English less than "very well"	84,777	±6,043
Vietnamese:	1,570,526	±37,736
Speak English "very well"	676,644	±17,587
Speak English less than "very well"	893,882	±28,698
Khmer:	193,070	±14,876
Speak English "very well"	100,071	±9,676
Speak English less than "very well"	92,999	±8,090
Thai, Lao, or other Tai-Kadai languages:	315,481	±16,600
Speak English "very well"	154,644	±10,005
Speak English less than "very well"	160,837	±10,188
Other languages of Asia:	409,682	±20,568
Speak English "very well"	203,310	±12,350
Speak English less than "very well"	206,372	±12,253
Tagalog (incl. Filipino):	1,763,585	±30,057
Speak English "very well"	1,241,929	±24,688
Speak English less than "very well"	521,656	±16,753
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	485,925	±20,787
Speak English "very well"	323,911	±16,205
Speak English less than "very well"	162,014	±10,112
Arabic:	1,260,437	±38,538
Speak English "very well"	818,936	±28,727

Speak English less than "very well"	441,501	±18,388
Hebrew:	210,824	±13,863
Speak English "very well"	186,236	±12,816
Speak English less than "very well"	24,588	±3,444
Amharic, Somali, or other Afro-Asiatic languages:	589,612	±25,015
Speak English "very well"	357,062	±18,025
Speak English less than "very well"	232,550	±14,620
Yoruba, Twi, Igbo, or other languages of Western Africa:	588,574	±29,314
Speak English "very well"	465,314	±22,396
Speak English less than "very well"	123,260	±11,452
Swahili or other languages of Central, Eastern, and Southern Africa:	299,156	±20,492
Speak English "very well"	199,520	±14,023
Speak English less than "very well"	99,636	±12,151
Navajo:	171,299	±8,021
Speak English "very well"	127,632	±6,818
Speak English less than "very well"	43,667	±3,419
Other Native languages of North America:	197,550	±8,805
Speak English "very well"	173,184	±7,765
Speak English less than "very well"	24,366	±3,008
Other and unspecified languages:	288,554	±14,663
Speak English "very well"	209,771	±10,846
Speak English less than "very well"	78,783	±7,819

**\* Demographic data can be found at : <https://data.census.gov/cedsci/>**

**Type: "B16001: Language Spoken at Home" in the search bar and select "B16001: Language Spoken at Home by Ability to Speak English" and follow this link for step by step Directions to Find Limited English Proficiency Demographic Data. Select the latest available data.**

## Arizona Chart of Demographics

Link:

<https://data.census.gov/cedsci/vizwidget?g=0400000US04&infoSection=Foreign%20Born&type=map>

## Maricopa County Chart of Demographics

<https://data.census.gov/cedsci/vizwidget?g=0500000US04013&infoSection=Language%20Spoken%20at%20Home&type=chart&chartType=bar>

- 2) The frequency with which LEP individuals come in contact with an **ACCEL** services;

**ACCEL**'s staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2021**. **ACCEL** averages **68** contacts per **DAY**.

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

ACCEL's Job Training Program utilizes highly specialized, research based methodologies, specifically designed to help individuals with severe disabilities develop marketable job skills. Over 200 high school students and 100 young adults with severe disabilities are involved in ACCEL's Job Training Program at our two sites.

ACCEL will offer language assistance to members who have limited English proficiency, at no cost to them, to facilitate timely access to transportation services. ACCEL will ensure availability of qualified staff interpreters or interpreter agencies that can provide language assistance. All members will be informed of the availability of language assistance services clearly and in their preferred language, verbally and in writing. ACCEL will ensure all members understand these provisions. ACCEL will ensure that all agency interpreters are qualified.

- 4) The resources available to **ACCEL** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.  
Cost are estimated at \$7,200 annually

**ACCEL** provides a some program information in Spanish and will translate for additional languages specific to the LEP community. Other languages will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

**Safe Harbor Provision for written translations**

**ACCEL** complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

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

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

1) **ACCEL** provides language assistance services through the below methods:

- Instructions are provided to customer service staff and other **ACCEL** 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
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2) **ACCEL** has a process to ensure the competency of interpreters and translation service through the following methods:

**ACCEL** will ask the interpreter or translator to demonstrate through a competency quiz so that he or she can communicate or translate information accurately in both English and the other language. **ACCEL** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **ACCEL** 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. **ACCEL** 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) **ACCEL** provides notice to LEP persons about the availability of language assistance through the following methods:

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

- Posting signs in intake areas and other points of entry
- Announcements at community meetings
- Information tables at local events
- Announcements in vehicles
- Agency websites
- Customer service lines

4) **ACCEL** monitors, evaluates and updates the LEP plan through the following process:

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

**ACCEL** 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. **ACCEL** 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. **ACCEL** 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. **ACCEL** will implement LEP training to be provided for agency staff. **ACCEL** staff training for LEP to include:

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

See attached samples of document ACCEL provides for LEP individuals



# Non-elected Committees Membership Table

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

Body	Caucasian	Latino	African American	Asian American	Native American
Population	67%	16%	12%	2%	3%
ACCEL Board of Directors	86%	0%	14%	0%	0%

ACCEL strives to ensure the participation of minorities on its Board of Directors. ACCEL is currently working with the American Indian Chamber of Commerce, the Latino Chamber of Commerce and the Black Chamber of Commerce to identify potential minority members.

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

# Monitoring for Subrecipient Title VI Compliance

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

## **\*Option A:**

**ACCEL** does **not** monitor subrecipients for Title VI compliance as it does not have any FTA subrecipients.

## Title VI Equity Analysis

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**ACCEL** has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since 2014.

**\*Option A:**

**ACCEL** is **not** a Fixed Route Transit Provider.

# Board Approval for the Title VI Plan

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Pending approval at the next Board meeting in late August early September. Board approval will be sent following the regular meeting within 72 hours.

**This Checklist has been created to assist you with the submittal of your Title VI Plan.**

Before submitting the Title VI Plan, ensure the plan has the following:

- Cover Page
- Table of Contents (**Update this by clicking on the contents box, and select the update table option.**  
**Please ensure every section begins in its own page to ensure the table reflects the correct pages.**)
- Executive Summary
- Non Discrimination Notices to the Public in English and Spanish
- Discrimination ADA/Title VI Complaint Procedures
- Discrimination ADA/Title VI Complaint Form
- Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits
- Public Participation Plan
- Limited English Proficiency Plan
- Non-elected Committees Membership Table
- Monitoring for Subrecipient Title VI Compliance
- Title VI Equity Analysis
- Fixed Route Transit Provider Analysis NA

Board Approval should be obtained after Conditional CRO approval:

- Board Approval for the Title VI Plan

Website Guidance – The following three documents must be posted on your agency’s webpage after they have been approved.

- Non Discrimination Notice to the Public (for each language that meets the Safe Harbor Provision)
- Discrimination Complaint Form
- Discrimination Complaint Procedures (may use one web link for both the Non Discrimination Complaint Form and Non Discrimination Complaint Procedures)