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Executive Summary

Portable, Practical Educational Preparation or PPEP, Inc. ENCOMPASS Division is a 501(c)3 nonprofit agency that was founded in 1967. PPEP, Inc. has been providing a variety of human, economic, microbusiness, education, charter schools, health, housing, counseling, employment, job training, humanitarian and services through our ENCOMPASS DDD division to the intellectually developmentally disabled supporting (18+) adult consumers with developmental and other disabilities for almost 35 years in Arizona. ENCOMPASS focuses its services on low-income individuals and families, serving all eligible persons referred by the Department of Economic Security, Division of Developmental Disabilities (DES/DDD). Some clients exhibit permanent physical challenges, including: cerebral palsy; visual and other sensory deficits; and permanent neurological conditions that may impair their ability to walk. The key to a full understanding of ENCOMPASS client needs (transportation and otherwise) lies in the recognition that all clients have substantial functional limitations that include: self-care, receptive/expressive language, learning capabilities, mobility capabilities, self-sufficiency, independent living, and self-direction. Encompass currently serves about 137 clients and has 11 programs in Tucson, 1 program in Green Valley, 3 programs in Ajo, 1 program in Sells, 1 program in Avondale, 5 programs in Globe, and 4 programs in Casa Grande. The name ENCOMPASS (ENhanced COMMunity Participation and Support Services) derives from the program’s key value: the idea that, with supportive services and communities, all clients and their families should be able to participate in and contribute to all aspects of community life that they wish to. Simply stated, ENCOMPASS advocates for and undertakes to assist clients in exhibiting self-advocacy, making choices in their communities, and moving toward what many of us work toward meaningful and purposeful lives.

ENCOMPASS specialized transportation program provides services to individuals with disabilities who are Residential clients, meeting typical daily-living needs such as: medical, socialization, and recreation. ENCOMPASS also provides specialized transportation services to individuals with disabilities who attend the Day Treatment and Training/EMPLOYMENT programs, assisting them with transportation to community activities, vocational training, and employment. Encompass provides transportation to clients that live in the following: cities/rural/reservation areas: Ahwatukee, Ajo, San Simion, Big Fields, Nolia, Schit Dohan, Tawpopa, BABO, Avondale, Surprise, Goodyear, Glendale, Casa Grande, Globe, Green Valley, Sahuarita, Peridot, Sacaton, Santa Rosa, Tolleson, Buckeye Laveen, Phoenix, Litchfield Park, Casa Blanca, Sells, and Tucson.

Encompass has been a grantee of 5310 funds since day one of funding opportunities.

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

☐ 5310
☐ Other (please explain)________________________

☐ 5311
☐ Other (please explain)________________________

Type of Funding Requests? (Select all that apply)

☐ Vehicle Funds
☐ Operating Funds
☐ Other (please explain)________________________
Non Discrimination Policy Statement

The PPEP, Inc., ENCOMPASS 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 PPEP, Inc., ENCOMPASS sponsored program or activity. There is no distinction between the sources of funding.

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

When PPEP, Inc., ENCOMPASS distributes Federal aid funds to another entity/person, PPEP, Inc., ENCOMPASS will ensure all sub recipients fully comply with PPEP, Inc., ENCOMPASS Title VI Nondiscrimination Program requirements. The Chief Executive Officer – C.E.O., has delegated the authority to Marta Vargas, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Dr. John David Arnold, Chief Executive Officer & Founder
Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA
PPEP, Inc. Encompass

The PPEP, Inc. Encompass 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 PPEP, Inc. Encompass.

For more information on the PPEP Inc. Encompass’s civil rights program, and the procedures to file a complaint, contact Marta Vargas, 520-806-4632 (TTY Arizona Relay Services, 1-800-842-9818); email mvargas@ppep.org; or visit our administrative office at 802 E. 46th Street Tucson, AZ 85713. For more information, visit www.ppep.org.

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: ADOT: ATTN: Title VI Program Manager 206 S. 17th Ave MD 155A RM: 183 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 Marta Vargas, 520-806-4632. Para información en Español llame: Marta Vargas, 520-806-4632
Aviso Público Sobre los Derechos Bajo el Título VI Y ADA
PPEP, Inc. Encompass

PPEP, Inc. Encompass (y sus subcontratistas, 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 PPEP, Inc. Encompass’s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Marta Vargas 520-806-4632, (TTY Arizona Relay Services, 1-800-842-9818); o visite nuestra oficina administrativa en 802 E. 46th Street Tucson, AZ 85713. Para obtener más información, visite www.ppep.org.

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: www.ppep.org

This notice is posted online at www.ppep.org
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 PPEP, Inc. Encompass 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.

(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 PPEP, Inc. Encompass 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 PPEP, Inc. Encompass or submitted to the State or Federal authority for guidance.

(7) PPEP, Inc. Encompass 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) **PPEP, Inc. Encompass** has 3 days/72 hours to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 3 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 3 (three) 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 **PPEP, Inc. Encompass** decision 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.ppep.org](http://www.ppep.org)

If information is needed in another language, contact 520-806-4632. Para información en Español llame: Martha Vargas, 520-806-4632
**Discrimination Complaint Form**

**Section I:**

<table>
<thead>
<tr>
<th>Field</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<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:
PPEP, Inc. Encompass, Martha Vargas, HRD & Title VI Coordinator
802 E. 46th Street
Tucson, AZ 85713
520-806-4632

A copy of this form can be found online at www.ppep.org
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>
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<td>1)</td>
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<td>Lawsuits</td>
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<tr>
<td>2)</td>
<td></td>
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</tr>
</tbody>
</table>

X  PPEP, Inc. Encompass has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2015.
Public Participation Plan

PPEP, Inc. Encompass
Public Participation Plan

PPEP, Inc., ENCOMPASS
Arizona
**PPEP, Inc. Encompass** 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, **PPEP, Inc. Encompass** made the following community outreach efforts:

**PPEP, Inc., ENCOMPASS** provides services to intellectual and developmental disabled adults in the Arizona communities served. The individuals and families are referred to PPEP, Inc., ENCOMPASS from the Arizona Department of Economic Security Division of Developmental Disabilities. PPEP, Inc., ENCOMPASS does not engage the public in its planning and decisions making process or marketing and outreach activities. Other than information to the public as presented on the agency website: [www.ppep.org](http://www.ppep.org).

In the upcoming year **PPEP, Inc. Encompass** will make the following community outreach efforts:


Approximately 99% of client referrals to the PPEP, Inc. ENCOMPASS program/services come from AZ DES, Division Developmental Disabilities is the primary organization that PPEP, Inc. ENCOMPASS receives referrals from.
PPEP, Inc. Encompass 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 PPEP, Inc. Encompass 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 PPEP, Inc. Encompass’s extent of obligation to provide LEP services, the PPEP, Inc. Encompass undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

1. *Demography*: The number and/or proportion of LEPs served and languages spoken in the service area.
2. *Frequency*: Rate of contact with service or program.
3. *Importance*: Nature and importance of program/service to people’s lives.
4. *Resources*: Available resources, including language assistance services varying from limited to wide ranging with varying costs.

The results of the four-factor analysis for this region are as follows:

1. *Demography*: According to the 2014 United States Census Bureau’s Population Estimates Program – Estimates that 73.70% of the population in Maricopa County, Arizona, speak only English. The highest percentage of another language spoken by the population is Spanish. Estimates - 20.28% speak Spanish and of these: 61.8% speak Spanish and English “very well”, while 38.20% speak English less than “very well”. The predominant language for this service area in Maricopa County is Spanish.

<table>
<thead>
<tr>
<th>County</th>
<th>English</th>
<th>Spanish</th>
<th>Other Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maricopa</td>
<td>73.70%</td>
<td>20.28%</td>
<td>6.02%</td>
</tr>
</tbody>
</table>

2. *Frequency*: Agencies providing day treatment services to individuals in Maricopa County, Arizona, that are intellectually, developmentally disabled, due to daily interactions and services with LEP populations, will translate materials into Spanish as needed to communicate with individuals and their guardians. Vital materials are translated into Spanish. Additional translations and interpreter services are offered.

3. *Importance*: Transportation is an important element to people’s independence. Inclusive community engagement is critical to ensuring that transportation planning is responsive to the needs of all clients served.
4. **Resources**: Resources to translate materials and interpret for individuals are available but finite. The investment is made to translate vital materials. PPEP, Inc. Encompass, maintains a standing offer to translate additional materials into additional languages and provide alternative formats such as Braille or large print. At least one person in the site located in Maricopa County, Arizona is bilingual (Spanish/English) and available to assist with interpretation. At a minimum, there is a bilingual staff member who can assist with interpretation at every service/policy meetings and at other public outings, or community events that clients are participating in and as needed.

**Safe Harbor Provision**

_PPEP, Inc. Encompass_ 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
### 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

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<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>
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</table>

*PPEP, Inc. Encompass does not select the membership of any transit-related committees, planning boards, or advisory councils.*
Monitoring for Subrecipient Title VI Compliance

X  PPEP, Inc. Encompass does NOT monitor subrecipients for Title VI compliance.
Title VI Training

PPEP, Inc. ENCOMPASS has an established Staff Training Policy – SCOPE: All employees must complete the minimum orientation and follow-up training as required the DES/DDD and ENCOMPASS within the time frames specified. Evidence of completion of training will be maintained in the employee’s training file.

Training for a new hire includes: Client Rights, - respect, dignity and positive interactions with clients, Agency Policy and Procedures – EEO Policy, Affirmative Action and Harassment, Driver and Passenger Safety, Code of Conduct, Article 9 (DDD) policies.


Annual Re-Training: review of all training required at 90 days of employment.

Upcoming training of all staff in 2016 – Cultural Competency: Diversity Matters. All ENCOMPASS staff will be required to attend this training, and an annual cultural competency training will be included in the Annual Re-Training curriculum.
Title VI Equity Analysis

PPEP, Inc., ENCOMPASS is NOT planning to acquire land to construct certain types of facilities at this time or within this 2016-2017 year. Any of the current PPEP, Inc., ENCOMPASS facilities where services are offered do not discriminate on the basis of race, color, or national origin in the programs or services offered to any of our clients.
Board Approval for the Title VI Program

PPEP, Inc. Board Meeting of August 29, 2016 will be presented with this plan for approval. Minutes of this meeting will be made available in support of this Title VI Program.
Organizational Chart

ATTACH A COPY OF THE ORGANIZATIONAL CHART HERE