

# Title VI Plan Cover Page

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## EASTERSEALS BLAKE FOUNDATION 2025

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Para Información en Español: Compliance 520-327-1529

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## Executive Summary

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Easterseals Blake Foundation is nonprofit organization dedicated to the idea that all people deserve the chance to live healthy, productive, and independent lives. Our educational, therapeutic, family support and community living programs are designed in accordance with our mission: to enable each individual served to discover and meet his or her maximum potential for independent, productive living and developmental growth. Easterseals Blake Foundation has been a grantee of ADOT 5310 funds for 30 plus years. We provide transportation to the following counties: Pima, Graham, Greenlee, Cochise and Santa Cruz. Easterseals Blake Foundation is an affiliate of National Easterseals and is governed by a local Board of Directors and Executive leadership.

### 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) \_\_\_\_\_ Maintenance

### Is your agency a direct recipient of FTA funds?

- ☐ Yes
- ☒ No

# Non Discrimination Notice to the Public

## Notifying the Public of Rights Under Title VI and ADA EASTERSEALS BLAKE FOUNDATION

**EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION**.

For more information on the **EASTERSEALS BLAKE FOUNDATION's** civil rights program, and the procedures to file a complaint, contact **EBF Compliance, 520-449-8525; email: [compliance@blake.easterseals.com](mailto:compliance@blake.easterseals.com)**; or visit our administrative office at **7750 E. Broadway Blvd. Tucson, AZ 85710**. For more information, visit **[www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com)**.

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **Compliance 520-327-1529**. \*Para información en Español llame: **Compliance 520-327-1529**

# Non Discrimination Notice to the Public - Spanish

## Aviso Público Sobre los Derechos Bajo el Título VI Y ADA EASTERSEALS BLAKE FOUNDATION

**EASTERSEALS BLAKE FOUNDATION** (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 proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **EASTERSEALS BLAKE FOUNDATION**, y los procedimientos para presentar una queja, contacte **EBF Compliance 520-449-8525**,; o visite nuestra oficina administrativa en **7750 E. Broadway Blvd. Tucson, AZ 85710**. Para obtener más información, visite **[www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com)**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

\*Para información en Español llame: **Compliance 520-327-1529**

*The above notice is posted in English and Spanish in the following locations:*

*7750 E. Broadway Blvd, Suite A200, Tucson, AZ 85710;*

*7756 E Broadway C100 Tucson, AZ 85710;*

*527 Main St., Safford, AZ 85646*

*This notice is posted online at [www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com);*

# Non Discrimination ADA/Title VI Complaint Procedures

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These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, 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 **EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION** or submitted to the State or Federal authority for guidance.



- (7) **EASTERSEALS BLAKE FOUNDATION** 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](mailto:civilrightsoffice@azdot.gov).
- (8) **EASTERSEALS BLAKE FOUNDATION** has 90 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 90 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 90 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 **EASTERSEALS BLAKE FOUNDATION** 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. 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
- (12) A copy of these procedures can be found online at: [www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com)

If information is needed in another language, contact **Compliance 520-327-1529**. \*Para información en Español llame: **Compliance 520-327-1529**

# Discrimination 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 <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
<p>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.</p> <p>_____</p> <p>_____</p> <p>_____</p>		
<b>Section IV:</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.		
_____		



### 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:

**Easterseals Blake Foundation, Compliance**

**7750 E. Broadway Blvd**

**Tucson, AZ 85710**

**520-327-1529**

**compliance@blake.easterseals.com**

A copy of this form can be found online at [www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com)

If information is needed in another language, contact **Compliance 520-327-1529**

\*Para información en Español llame: **Compliance 520-327-1529**

# Formulario de Queja por Discriminación

<b>Section I:</b>		
Nombre:		
Dirección:		
Teléfono (casa):	Teléfono (trabajo):	
Dirección de correo electrónico:		
Requisitos de formato accesible?	<input type="checkbox"/> Letra grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
<b>Section II:</b>		
¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí*	<input type="checkbox"/> No
<i>* Si respondió "sí" a esta pregunta, vaya a la <b>Sección III</b>.</i>		
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja.		
Explique por qué ha solicitado por otra persona:		
Confirme que ha obtenido el permiso de la parte perjudicada si usted presentando una demanda en nombre de un tercero.	<input type="checkbox"/> Sí	<input type="checkbox"/> No
<b>Section III:</b>		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Discapacidad Fecha de presunta discriminación (mes, día, año): _____ Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.  _____ _____ _____		
<b>Section IV:</b>		
¿Ha presentado anteriormente una queja por discriminación con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.  _____		

<b>Section V:</b>	
¿Ha presentado esta queja con alguna agencia Federal, Estatal, o local, o con algún tribunal Federal o Estatal?	
<input type="checkbox"/> Si	<input type="checkbox"/> No
En caso afirmativo, marque todo lo que corresponda:	
<input type="checkbox"/> Agencia Federal: _____	
<input type="checkbox"/> Tribunal Federal: _____	<input type="checkbox"/> Agencia del estado: _____
<input type="checkbox"/> Tribunal Estatal: _____	<input type="checkbox"/> Agencia local: _____
Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.	
Nombre: _____	
Titulo: _____	
Agencia: _____	
Dirección: _____	
Teléfono: _____	
<b>Section VI:</b>	
Nombre de la agencia de la cual se esta presentando la queja.	
Nombre de la persona de la cual se esta presentando la queja	
Titulo: _____	
Ubicacion: _____	
Nombre de la agencia de la cual se esta presentando la queja.	

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación

_____ Firma	_____ Fecha
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Envíe este formulario en persona a la dirección que se encuentra debajo, o envíe este formulario por correo a: **Easterseals Blake Foundation, Compliance**

**7750 E. Broadway Blvd**  
**Tucson, AZ 85710**  
**520-327-1529**  
**compliance@blake.easterseals.com**

Puede encontrar una copia de este formulario en [www.blakefoundation.easterseals.com](http://www.blakefoundation.easterseals.com)

# Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

☒ **EASTERSEALS BLAKE FOUNDATION** has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2019/2020**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
<b>Investigations</b>						
1)						
2)						
<b>Lawsuits</b>						
1)						
2)						
<b>Complaints</b>						
1)						
2)						
3)						

# Public Participation Plan

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**EASTERSEALS BLAKE FOUNDATION** 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, **EASTERSEALS BLAKE FOUNDATION** made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.

Easterseals Blake Foundation Community Outreach:

Surveys annually to individuals and/or families receiving services through Agency Programs.

Posted Nondiscrimination Public notices in all transportation vehicles and lobbies of all offices.

Invites community members to participate as Board Members.

Holds annual meetings with individuals, State of Arizona Representatives (DES/DDD/RSA) advocates, and family members who participate in Agency Programs.

Invites public comments and participation through our website.

In the upcoming year **Easterseals Blake Foundation** will make the following community outreach efforts:

Continue to send out surveys to individuals and/or families receiving services through Agency Programs.

Continue to invite public comment and involvement thorough our website.

Continue to hold meetings annually with individuals, DES State of Arizona Representatives, advocates and family members who participate in Agency Programs,

Continue to have a booth at community job fairs and local transition fairs.

# Limited English Proficiency Plan

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**EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION**'s extent of obligation to provide LEP services, the **EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION** service area who may be served or likely to encounter by **EASTERSEALS BLAKE FOUNDATION** program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with any **EASTERSEALS BLAKE FOUNDATION** services;  
EBF encounters Spanish LEP individuals on a regular basis which is much less frequent than the general population. We provide vital materials in Spanish and additionally have approximately 23% of our staff who are bi-lingual (Spanish & English). Additional translation and interpreter services are offered if needed. EBF has not had any requests for the other LEP languages in Pima County (Chinese, Vietnamese or Arabic). If EBF were to receive any requests we would provide written and oral translation services.
- 3) The nature and importance of the program, activities or services provided by the **EASTERSEALS BLAKE FOUNDATION** to the LEP population;  
EBF provides services including transportation that are critical for LEP individuals. Individuals' transportation needs are determined in annual ISP meetings. Transportation services allows LEP individuals to be active members of their communities and provides transportation to critical services (medical/doctor appointments, grocery shopping, etc.)
- 4) The resources available to **EASTERSEALS BLAKE FOUNDATION** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

**EASTERSEALS BLAKE FOUNDATION** provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

### 2021: ACS 5-Year Estimate

	Cochise County, Arizona		Graham County, Arizona		Greenlee County, Arizona		Pima County, Arizona		Santa Cruz County, Arizona	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:	118,133	±44	35,543	±5	8,838	±22	979,353	±57	44,277	±8
Speak only English	85,834	±1,511	28,030	±695	7,378	±244	712,103	±4,332	9,220	±621
Spanish:	27,881	±1,481	5,385	±643	1,207	±253	220,384	±3,559	34,760	±565
Speak English "very well"	19,813	±1,274	4,413	±653	955	±244	158,912	±3,415	19,808	±1,320
Speak English less than "very well"	8,068	±672	972	±224	252	±111	61,472	±2,680	14,952	±1,369
French, Haitian, or Cajun:	450	±171	99	±74	0	±19	3,502	±1,017	133	±113
Speak English "very well"	402	±162	10	±12	0	±19	2,989	±982	69	±56
Speak English less than "very well"	48	±48	89	±73	0	±19	513	±232	64	±101
German or other West Germanic languages:	1,136	±325	77	±64	0	±19	2,930	±571	18	±16
Speak English "very well"	1,063	±316	52	±58	0	±19	2,707	±559	18	±16
Speak English less than "very well"	73	±62	25	±25	0	±19	223	±86	0	±28
Russian, Polish, or other Slavic languages:	200	±183	12	±12	0	±19	2,910	±620	0	±28
Speak English "very well"	195	±175	12	±12	0	±19	1,830	±477	0	±28
Speak English less than "very well"	5	±23	0	±28	0	±19	1,080	±311	0	±28
Other Indo-European languages:	430	±243	57	±56	0	±19	7,187	±983	26	±21
Speak English "very well"	416	±241	42	±50	0	±19	5,799	±739	17	±17
Speak English less than "very well"	14	±15	15	±25	0	±19	1,388	±369	9	±11
Korean:	611	±152	0	±28	6	±9	2,030	±502	2	±4
Speak English "very well"	273	±105	0	±28	6	±9	1,163	±358	0	±28
Speak English less than "very well"	338	±134	0	±28	0	±19	867	±300	2	±4
Chinese (incl. Mandarin, Cantonese):	119	±67	4	±9	26	±44	5,912	±885	10	±18
Speak English "very well"	28	±31	0	±28	26	±44	3,159	±575	10	±18
Speak English less than "very well"	91	±61	4	±9	0	±19	2,753	±505	0	±28

Vietnamese:	324	±181	0	±28	0	±19	2,804	±579	0	±28
Speak English "very well"	136	±113	0	±28	0	±19	1,381	±351	0	±28
Speak English less than "very well"	188	±134	0	±28	0	±19	1,423	±320	0	±28
Tagalog (incl. Filipino):	329	±140	182	±134	11	±19	2,614	±534	108	±159
Speak English "very well"	241	±134	146	±115	0	±19	2,038	±486	108	±159
Speak English less than "very well"	88	±72	36	±65	11	±19	576	±137	0	±28
Other Asian and Pacific Island languages:	363	±198	11	±26	48	±72	4,011	±619	0	±28
Speak English "very well"	281	±179	0	±28	27	±42	2,749	±478	0	±28
Speak English less than "very well"	82	±51	11	±26	21	±32	1,262	±353	0	±28
Arabic:	20	±25	18	±32	0	±19	3,135	±962	0	±28
Speak English "very well"	20	±25	0	±28	0	±19	2,049	±670	0	±28
Speak English less than "very well"	0	±31	18	±32	0	±19	1,086	±404	0	±28
Other and unspecified languages:	436	±171	1,668	±244	162	±74	9,831	±1,186	0	±28
Speak English "very well"	313	±109	1,358	±221	143	±71	7,552	±823	0	±28
Speak English less than "very well"	123	±96	310	±119	19	±28	2,279	±656	0	±28





### Safe Harbor Provision for written translations

**EASTERSEALS BLAKE FOUNDATION** 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
- (6) Public Hearings

1) **EASTERSEALS BLAKE FOUNDATION** provides language assistance services through the below methods:

- ☒ Staff have a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services in our Policy and Procedures Manual.
  - ☒ Instructions are provided to customer service staff and other **EASTERSEALS BLAKE FOUNDATION** 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.
  - ☒ Instructions are provided to vehicle operators, dispatchers, and others who regularly interact with the public on how to respond to an LEP customer.
- 

2) **EASTERSEALS BLAKE FOUNDATION** has a process to ensure the competency of interpreters and translation service through the following methods:

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

- ☒ Posting signs in intake areas and other points of entry
- ☒ Statements in outreach documents that language services are available from the agency.
- ☒ Announcements at community meetings
- ☒ Information tables at local events
- ☒ Signs and handouts available in vehicles and at offices
- ☒ Agency websites

4) **EASTERSEALS BLAKE FOUNDATION** monitors, evaluates and updates the LEP plan through the following process:

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

**EASTERSEALS BLAKE FOUNDATION** 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. **EASTERSEALS BLAKE FOUNDATION** 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. **EASTERSEALS BLAKE FOUNDATION** 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. **EASTERSEALS BLAKE FOUNDATION** will implement LEP training to be provided for agency staff. **EASTERSEALS BLAKE FOUNDATION** staff training for LEP to include:

- A summary of the **EASTERSEALS BLAKE FOUNDATION** responsibilities under the DOT LEP Guidance;
- A summary of the **EASTERSEALS BLAKE FOUNDATION** language assistance plan;



- A summary of the number and proportion of LEP persons in the **EASTERSEALS BLAKE FOUNDATION** 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 **EASTERSEALS BLAKE FOUNDATION** cultural sensitivity policies and practices.

# Non-elected Committees Membership Table

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Subrecipients who select 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.

☒ **EASTERSEALS BLAKE FOUNDATION** 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.

☒ **EASTERSEALS BLAKE FOUNDATION** does not monitor subrecipients for Title VI compliance as it does not have any FTA Subrecipients.

## Title VI Equity Analysis

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A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

☒ **EASTERSEALS BLAKE FOUNDATION** has no current or anticipated plans to develop new transit facilities covered by these requirements

# Fixed Route Transit Provider Analysis

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Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

☒ **EASTERSEALS BLAKE FOUNDATION** is not a Fixed Route Transit Provider

# Board Approval for the Title VI Plan

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Board meeting held on 2/26/25 where the plan was approved. Approved minutes to follow.