
Title VI Implementation Plan

LifeStream at Sun City



April 1, 2024 – March 31, 2027

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Title VI Policy Statement

The Sun Valley Lodge d.b.a. LifeStream at Sun City (“LifeStream”) Title VI policy assures full compliance with Title VI of the Civil Rights act of 1964 and related statutes and regulations in all programs and activities. Title VI states that “No person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination,” under any LifeStream sponsored program or activity. There is no distinction among LifeStream’s sources of funding.

LifeStream has implemented policies to help prevent discrimination, through the impact of its programs and activities, towards minority and low-income populations. Furthermore, LifeStream will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When LifeStream distributes Federal-aid funds to another entity/person, LifeStream will ensure all subrecipients fully comply with LifeStream Title VI Nondiscrimination Program requirements. The Executive Director at LifeStream is the Title VI Program Coordinator and has the authority to oversee and implement FTA Title VI requirements.

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI **LifeStream at Sun City**

LifeStream operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LifeStream.

For more information on LifeStream's civil rights program, and the procedures to file a complaint, contact the Executive Director at 602-612-9875; email geninfo@ba.org; or visit our administrative office at 12415 N. 103rd Ave. Sun City, AZ 85351. For more information, visit lifestreamatsuncity.com.

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: City of Phoenix Public Transit Department: ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 602-612-9875. Para información en Español llame: 602-612-9875.

Title VI Notice to the Public - Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI LifeStream at Sun City

LifeStream (*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 LifeStream's programa de derechos civiles, y los procedimientos para presentar una queja, contacte la directora ejecutiva: 602-612-9875; email geninfo@ba.org; o visite nuestra oficina administrativa en 12415 N. 103rd Ave. Sun City, AZ 85351. Para obtener más información, visite lifestreamatsuncity.com.

El puede presentar una queja directamente con Departamento de Transporte Público de la Ciudad de Phoenix o Administración Federal de Transporte (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Derechos Civiles: Departamento de Transporte Público de la Ciudad de Phoenix: Coordinador del Título VI de ATTN 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Coordinador del Programa Título VI, Edificio Este, 5to Piso –TCR 1200 New Jersey Ave., SE Washington DC 20590.

The notice is posted online at lifestreamatsuncity.com. This notice is also posted at the LifeStream community located at 12415 N. 103rd Ave. Sun City, AZ 85351 on the general message board of the facility.

Title VI Complaint Procedures

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

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address, and phone number. The Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted, LifeStream 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 LifeStream or submitted to the State or Federal authority for guidance.
- (7) LifeStream will notify the Title VI Coordinator of all Title VI complaints within 72 hours via telephone at: 602-262-7242; email to: phxtransiteo@phoenix.gov

- (8) LifeStream has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 60 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with LifeStream's decision may file a complaint directly with the City of Phoenix Public Transit Department (COP): Attention: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, or the Federal Transit Administration (FTA) offices of Civil Rights: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: lifestreamatsuncity.com.

Título VI Procedimientos de Denuncia

Estos procedimientos brindan orientación para todas las quejas presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964, ya que se relacionan con cualquier programa o actividad administrada por LifeStream en Sun City, incluidos consultores, contratistas y proveedores. La intimidación o represalias como resultado de una queja están prohibidas por ley. Además de estos procedimientos, los denunciantes se reservan el derecho de presentar una denuncia formal ante otras agencias estatales o federales o de buscar asesoramiento privado para denuncias que alegan discriminación. Se hará todo lo posible para resolver las quejas al nivel más bajo posible.

- (1) Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional puede presentar una queja del Título VI completando y enviando el Formulario de queja del Título VI de la agencia.
- (2) Las quejas formales deben presentarse dentro de los 180 días calendario a partir de la última fecha del presunto acto de discriminación o la fecha en que el denunciante tuvo conocimiento de la presunta discriminación, o cuando ha habido un curso de conducta continuo, el fecha en que se interrumpió la conducta o el último caso de la conducta.
- (3) Las quejas deben realizarse por escrito y estar firmadas por el(los) reclamante(s) y deben incluir el nombre, la dirección y el número de teléfono del(los) reclamante(s). La persona de contacto del Título VI ayudará al denunciante a documentar los problemas si es necesario.
- (4) Las denuncias recibidas por fax o correo electrónico serán reconocidas y procesadas una vez que se haya establecido la identidad del denunciante y la intención de proceder con la denuncia. Para esto, el demandante debe enviar por correo una copia original firmada del fax o correo electrónico para que se procese la queja.
- (5) Las acusaciones recibidas por teléfono se pondrán por escrito y se entregarán al denunciante para su confirmación o revisión antes de procesarlas. Se enviará un formulario de queja al demandante para que lo complete, lo firme y lo devuelva para su procesamiento.
- (6) Una vez enviado, LifeStream revisará el formulario de queja para determinar la jurisdicción. Todas las quejas recibirán una carta de acuse de recibo informándole si la queja será investigada por LifeStream o enviada a la autoridad estatal o federal para obtener orientación.
- (7) LifeStream notificará al Coordinador del Título VI todas las quejas del Título VI dentro de las 72 horas por teléfono al: 602-262-7242; correo electrónico a: phxtransiteo@phoenix.gov
- (8) LifeStream tiene 60 días para investigar la denuncia. Si se necesita más información para resolver el caso, la Autoridad podrá contactar al denunciante. El denunciante tiene 60 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el denunciante no se comunica con el investigador o no recibe la información adicional dentro de los 30 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso también puede cerrarse administrativamente si el demandante ya no desea continuar con su caso.

- (9) Después de que el investigador revise la queja, enviará una de dos cartas al demandante: una carta de cierre o una Carta de conclusión (LOF). Una carta de cierre resume las acusaciones y establece que no hubo un Título VI. violación y que el caso será cerrado. Una LOF resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si se tomará alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene 30 días después de la fecha de la carta o de la LOF para hacerlo.
- (10) Un reclamante que no esté satisfecho con la decisión de LifeStream puede presentar una queja directamente ante el Departamento de Transporte Público (COP) de la ciudad de Phoenix: Atención: Coordinador del Título VI, 302 N. 1st Ave., Suite 900, Phoenix, AZ 85003, o las oficinas de Derechos Civiles de la Administración Federal de Tránsito (FTA): Atención Coordinador del Programa Título VI, Edificio Este, 5to Piso-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) Puede encontrar una copia de estos procedimientos en línea en: lifestreamatsuncity.com.

Title VI Complaint Forms

TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at csr@valleymetro.org.

SECTION 1: CUSTOMER INFORMATION

First Name: _____ Last Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Home Phone: _____ Cell Phone: _____
Email: _____ Preferred method of contact: ☐ Phone ☐ Email

SECTION 2: INCIDENT INFORMATION

Date of Incident: _____ Time of Incident: _____ ☐ AM ☐ PM City: _____
Incident Location: _____ Direction of Travel: _____
Route #: _____ Bus/Light Rail/Streetcar #: _____
Service Type: ☐ Local Bus ☐ Express/RAPID ☐ Circulator/Connector ☐ Light Rail ☐ Streetcar ☐ Dial-a-Ride
Operator Name: _____
Operator Description: _____
What was the discrimination based on (Check all that apply): ☐ Race ☐ Color ☐ National Origin ☐ Other _____

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. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? ☐ Yes ☐ No
If yes, please provide information about a contact person at the FTA where the complaint was filed:

Name: _____ Title: _____
Address: _____ Phone: _____

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No
Signature and date required below:

Signature _____
Date _____



FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) o por correo electrónico a csr@valleymetro.org.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre: _____ Apellido: _____
Domicilio: _____
Ciudad: _____ Estado: _____ Código Postal: _____
Teléfono del Hogar: _____ Teléfono Celular: _____
Correo Electrónico: _____ Método preferido de contacto: ☐ Teléfono ☐ Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente: _____ Hora del Incidente: _____ ☐ AM ☐ PM Ciudad: _____
Ubicación del Incidente: _____ Dirección del Viaje: _____
Ruta #: _____ Autobús/Tren Ligero/Tranvía #: _____
Tipo de Servicio ☐ Autobús Local ☐ Express/RAPID ☐ Circulador/Conector ☐ Tren Ligero ☐ Tranvía ☐ Dial-a-Ride
Nombre del/la Operador/a: _____
Descripción del/la Operador/a: _____

¿En qué se basó la discriminación? (Marque todo lo que sea aplicable):

☐ Raza ☐ Color ☐ Origen Nacional ☐ Otro _____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? ☐ Sí ☐ No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre: _____ Título: _____
Domicilio: _____ Teléfono: _____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? ☐ Sí ☐ No

Firma y fecha requeridas abajo:

Firma _____
Fecha _____



Title VI Investigations, Complaints, and Lawsuits

A separate Annual Title VI Report must be submitted each year by October 15th as a part of the Milestone Progress Reporting (MPR) data.

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

☒ LifeStream has not had any Title VI complaints, investigations, or lawsuits during the review period between April 1, 2021 and March 31, 2024. (Each review period start date is the date of board of director approval)

Public Participation Plan

LifeStream at Sun City Public Participation Plan



LifeStream 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 through public meetings or surveys. As an agency receiving federal financial assistance, LifeStream made the following community outreach efforts:

LifeStream is a small private campus where many independent living residents live and create their own community. LifeStream promotes and holds a Resident Council through which residents meet on a quarterly basis. LifeStream is continually engaging those residents in its planning and decision-making processes through the Resident Council. LifeStream is planning on beginning resident surveys at the end of July for all residents in the Community. Those surveys will be issued to residents of the property upon admission, thirty days after admission, and every six months. As an agency receiving federal financial assistance, LifeStream made the following Resident outreach efforts:

Quarterly Resident Council Meetings: **LifeStream held Resident Council Meetings on 9/11/2023, 11/6/2023, 12/4/2023, 1/8/2024, 2/5/2024, and 3/5/2024**

Resident Surveys: **LifeStream is planning on beginning resident surveys at the end of July for all residents in the Community. Those surveys will be issued to residents of the property upon admission, thirty days after admission, and every six months.**

In the upcoming years LifeStream will continue to conduct these quarterly meetings/annual surveys to solicit the ideas of our residents.

LifeStream does not hold meetings which are open to the general public.

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.

Limited English Proficiency Plan

LifeStream at Sun City - Limited English Proficiency Plan



LifeStream 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 LifeStream's 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 LifeStream's extent of obligation to provide LEP services, the LifeStream 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 LifeStream service area who may be served or likely to encounter LifeStream program, activities, or services;

- 2) The frequency with which LEP individuals come in contact with LifeStream services;
- 3) The nature and importance of the program, activities or services provided by LifeStream to the LEP population; and
- 4) The resources available to LifeStream and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in English and 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. In the event an LEP individual desires to communicate in a language other than Spanish or English, LifeStream will engage a third-party interpreter to assist in communication.

Safe Harbor Provision

LifeStream 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

Non-elected Committees Membership

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.

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

Monitoring for Subrecipient Title VI Compliance

☒ LifeStream does NOT have subrecipients.

Title VI Equity Analysis

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 sub recipient organization receives any FTA dollars, it must comply with this requirement.

LifeStream has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since 1965.

Board Approval for the Title VI Program

Please see the next page for a copy of the April 23, 2024 Board of Directors Meeting Minutes.

Regular Meeting of the Board of Directors
Sun Valley Lodge
April 23, 2024
(Partial Minutes)

The regular meeting of the Board of Directors of Sun Valley Lodge was held at the corporate office in Colorado Springs, Colorado on Tuesday, April 23, 2024, at 2:00 PM. The following Directors were present and participated in the meeting: Jenny Kennedy, Dana Rasic, Nathan Merrill, Dan Vagle, Rick Summers, Dale Turner, Don Morgan, Larry Smith, Kristen Jacoby, and Christi Miller. Austin Harbach was present as a guest to record the minutes.

Proper notice of the meeting had been given and a quorum was present. By unanimous consent, Dana Rasic chaired the meeting and Austin Harbach recorded the minutes.

Opening: Dana welcomed the Board and guests to the meeting.

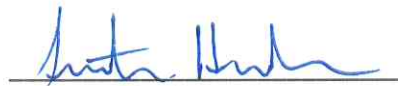
Sun Valley Lodge Title VI Plan: Austin Harbach presented Sun Valley Lodge's draft Title VI Plan and public notices to the Board. As a part of Sun Valley Lodge's two vehicle grants through the City of Phoenix, Sun Valley Lodge updates and reviews its Title VI Plan every three years to ensure we are in compliance and to help protect any beneficiaries of the grants from unlawful discrimination in Sun Valley Lodge's use of the vehicles. The Plan and notices will be posted on Sun Valley Lodge's website and available at the community. Following discussion by the Board, it was

MOVED to approve Sun Valley Lodge's Title VI Implementation Plan and related notices and forms, for the period of April 1, 2024 through March 31, 2027. (msp)

Meeting Schedule:

- July 23, 2024 - 8:00AM – 5:00PM BOD Only
- September 17, 2024 - 9:30AM – 5:00PM (Budget Meeting) BOD/Support Services
- October 29, 2024 - 8:00AM – 5:00PM BOD/LT Support Services Year-End Review

Adjournment. Dana adjourned the meeting at 5:30 PM.


Austin Harbach, Assistant Secretary