

---

# *Title VI Implementation Plan*

---

***Nobody's Perfect Inc.***  
*July 28, 2018 – July 27, 2021*

*Revised July 28, 2020*

# Contents

---

Title VI Policy Statement ..... 3

Title VI Notice to the Public ..... 4

Title VI Notice to the Public -Spanish ..... 5

Title VI Complaint Procedures ..... 6

Title VI Complaint Form ..... 7

Title VI Investigations, Complaints, and Lawsuits ..... 9

Public Participation Plan ..... 10

Limited English Proficiency Plan ..... 11

Non-elected Committees Membership Table ..... 12

Monitoring for Subrecipient Title VI Compliance ..... 13

Board Approval for the Title VI Program ..... 14

# Title VI Policy Statement

---

The **NOBODY'S PERFECT INC.** policy assures full compliance with Title VI of the Civil Rights act of 1964. 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 **NOBODY'S PERFECT INC.** sponsored program or activity. There is no distinction between the sources of funding.

**NOBODY'S PERFECT INC.** 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, **NOBODY'S PERFECT INC.** will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When **NOBODY'S PERFECT INC.** distributes Federal-aid funds to another entity/person, **NOBODY'S PERFECT INC.** will ensure all sub-recipients fully comply with **NOBODY'S PERFECT INC.** Title VI Nondiscrimination Program requirements. The **EXECUTIVE DIRECTOR** has delegated the authority to **PHILIP PAJAK**, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

---

PHILIP PAJAK    EXECUTIVE DIRECTOR

# Title VI Notice to the Public

---

## Notifying the Public of Rights under Title VI **NOBODY'S PERFECT INC.**

The **NOBODY'S PERFECT INC.** 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. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **NOBODY'S PERFECT INC.**

For more information on the **NOBODY'S PERFECT INC.** civil rights program, and the procedures to file a complaint, contact **PHILIP PAJAK, (480 840-9351)**; email [philippajak@nobodysperfectinc.org](mailto:philippajak@nobodysperfectinc.org); or visit our administrative office at **18911 E San Tan Boulevard Queen Creek AZ 85142**. For more information, visit [www.nobodysperfectinc.org](http://www.nobodysperfectinc.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 **480 452-7486**. Para información en Español llame: **CARLA MANZANO**

*The above notice is posted in the following locations: **18911 E SAN TAN BOULEVARD, QUEEN CREEK AZ 85142***

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

# Title VI Notice to the Public -Spanish

## Aviso al Público Sobre los Derechos Bajo el Título VI NOBODY'S PERFECT INC.

**NOBODY'S PERFECT INC.** (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 **NOBODY'S PERFECT INC.**'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte **PHILIP PAJAK 480 840-9351**; o visite nuestra oficina administrativa en **18911 E SAN TAN BOULEVARD, QUEEN CREEK AZ 85142**. Para obtener más información, visite **[www.nobodysperfectinc.org](http://www.nobodysperfectinc.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

Para información en Español llame: **CARLA MANZANO, 480 452-7486**

*The above notice is posted in the following locations: **18911 E SAN TAN BOULEVARD, QUEEN CREEK AZ 85142***

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

# Title VI Complaint Procedures

---

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any **NOBODY'S PERFECT INC.** program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with the **EXECUTIVE DIRECTOR**. This anti-discrimination protection also extends to the activities and programs of **NOBODY'S PERFECT INC.** third party contractors. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes, **NOBODY'S PERFECT INC.** must ensure that no person shall of the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged non-compliance with Title VI and related statutes may be lodged with the **EXECUTIVE DIRECTOR**. Any such complaint must be filed within 180 day of the alleged discriminatory act (or latest occurrence).

To submit a claim by mail or in person, please fill out the printable complaint form and mail/take to:

**NOBODY'S PERFECT INC. PHILIP PAJAK, EXECUTIVE DIRECTOR**  
Address: **18911 E SAN TAN BOULEVARD QUEEN CREEK AZ 85142**  
Email: **admin@nobodysperfectinc.org**  
Phone: **480 840-9351**

Complaints received by **NOBODY'S PERFECT INC.** will be investigated in accordance with Federal standards (28CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed **NOBODY'S PERFECT INC.** will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for the region, is responsible for monitoring this process.

# 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
<input type="checkbox"/> 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.		
_____		
_____		
_____		
<b>Section VI:</b>		
Have you previously filed a Title VI 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:

**NOBODY’S PERFECT INC. EXECUTIVE DIRECTOR  
18911 E SAN TAN BOULEVARD,  
QUEEN CREEK AZ 85142  
480 840-9351**

A copy of this form can be found online at [www.nobodysperfectinc.org](http://www.nobodysperfectinc.org)



# Title VI Investigations, Complaints, and Lawsuits

---

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

**NOBODY'S PERFECT INC.** has not had any Title VI complaints, investigations, or lawsuits in **2015**.

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

# Public Participation Plan

---

---

## *NOBODY'S PERFECT INC.*

---

**NOBODY'S PERFECT INC.** 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, **NOBODY'S PERFECT INC.** made the following community outreach efforts:

In the upcoming year **NOBODY'S PERFECT INC.** will make the following community outreach efforts:

**NOBODY'S PERFECT INC. Provides supported employment services and Day Program activities for the developmentally disabled. We receive referrals from the State of Arizona to provide transportation for these same individuals. We will continue to provide these services in the year to come. The person's planning team is involved in making these decisions. We also make arrangements for transportation for individuals not funded through state services.**

### **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.

**NOBODY'S PERFECT INC.** submits to the City of Phoenix and the Maricopa Association of Governments occasionally an application for funding. Part of the application is a public notice, which includes a 30-day public comment period.

# Limited English Proficiency Plan

---

## Nobody's Perfect has adopted the City of Phoenix Language Access Plan

**NOBODY'S PERFECT INC.** 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 **NOBODY'S PERFECT INC.** 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 **NOBODY'S PERFECT INC.** extent of obligation to provide LEP services, the **NOBODY'S PERFECT INC.** 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 **NOBODY'S PERFECT INC.** service area who may be served or likely to encounter by **NOBODY'S PERFECT INC.** program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an **NOBODY'S PERFECT INC.** services;
- 3) The nature and importance of the program, activities or services provided by the **NOBODY'S PERFECT INC.** to the LEP population; and
- 4) The resources available to **NOBODY'S PERFECT INC.** and overall costs to provide LEP assistance.

A brief description of these considerations is provided in the following section.

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.

### **Safe Harbor Provision**

**NOBODY'S PERFECT INC.** 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) Public Hearings

# Non-elected Committees Membership Table

---

**NOBODY'S PERFECT INC.** does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Sub-recipient Title VI Compliance

---

**NOBODY'S PERFECT INC** does NOT monitor sub-recipients for Title VI compliance.

# Board Approval for the Title VI Program

---

Nobody's Perfect Inc.  
Board Meeting Minutes  
February 27, 2016

---

## **Board Members & Attendance:**

[P] Philip Pajak – *NPI Executive Director*  
[P] Bob Modig – *NPI President*  
[P] Karen Egan – *NPI Secretary*

[ P ] Sandy Lunsford  
[ A ] Cynthia Vaughn  
[ P ] Kathy Weir

### **Attendance Key**

P=Present A=Absent

N=Notified of Absence

## **1. Call to order/ Attendance Roll Call**

Bob Modig attended via conference call and called the meeting to order at 9:00 a.m. The meeting was held at The Good Egg, 1665 S. Dobson Road, Mesa, Arizona. We had a prospective board member as a guest, Julia Beall.

## **2. Approval of August 2015 and November 2015 Board Meeting Minutes Financial Reports for FY 2015-16 Q2**

### **Meeting Minutes**

Due to the death of Karen's father that week, she was unable to participate in the November 21, 2015 meeting or get out the August 22, 2015 minutes. The Board reviewed both the August and November 2015 minutes and had no questions or corrections. Bob called for a vote to accept; Kathy moved to approve, Sandy seconded and the Board voted unanimously to approve.

### **Financial Reports**

Phil sent out financials for FY 2015-16 Q2. After discussion with no concerns, Bob called for a vote to accept; Karen moved to approve, Sandy seconded and the Board voted unanimously to approve.

## **3. Governance Calendar Items:**

- Discussion and call for approval of new board member(s)
  - Julia Beall

Phil and Julia took a walk while the rest of the Board discussed Julia Beall's application. Bob called for a vote to accept; Sandy moved to approve, Karen seconded and the Board voted unanimously to approve.

- Discussion to elect new or retain board officers

Phil detailed the status of Board member terms. After discussion, Bob agreed to another two year term and remain President for another year, Karen agreed to remain Secretary for another year, Sandy agreed to remain on the Board for another term and Kathy understands she is entering the second year of her first two year term. Phil will contact Cynthia and inquire if she wishes to sign on for another term.

#### **4. Discussion:**

- **Property Purchase**

Phil has found a building and parcel of property near the corner of Power Road and Main Street in Mesa that NPI has put in an offer to buy for \$700,000. Buyers and sellers have signed off on a letter of intent. NPI is awaiting the purchase contract from the sales agent. NPI is prepared to put down \$150,000 and has been preapproved for a \$550,000 mortgage through Chase Bank.

- **Sign Resolution for Chase Mortgage and Credit Card**

We need the Secretary to sign the prepared Resolution that authorizes Phil to sign mortgage documents on behalf of the NPI organization. This was done. NPI has been approved for a non-profit agency credit card and will earn points that can be turned into gift cards or whatever is desired later.

- **Approval of Title VI Implementation Plan**

Phil reviewed the elements of the Title VI Implementation Plan with the Board. It contains assurances that Nobody's Perfect will comply with the City of Phoenix model regarding persons with Limited English Proficiency, and taking reasonable steps to provide access to meaningful service, including complaint forms and bilingual contact persons. The Board supports this Plan and assurances with its vote.

Bob called for a vote to accept; Kathy moved to approve, Sandy seconded and the Board voted unanimously to approve.

#### **5. Other Business:**

Next meeting: Saturday May 21, 2016, at 9:00 a.m. at The Good Egg.

#### **6. Adjourn:**

Bob adjourned the meeting with no further business to discuss at 9:

