



Civil Rights

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ARIZONA DEPARTMENT OF TRANSPORTATION Title VI On-site Compliance Review Assessment Certification Acceptance Agencies

Purpose

Clear

Title 23 Code of Federal Regulations (CFR) Part 200.9 requires the State to conduct reviews of planning agencies, certification acceptance (CA) agencies and other recipients of Federal Highway Administration (FHWA) funds to determine compliance with Title VI, which includes Environmental Justice matters.

To comply with the requirements imposed by FHWA and to ensure that the CA agency’s transportation-related planning activities are provided in a nondiscriminatory manner, the Civil Rights Office conducts On-site Compliance Reviews on a rotating basis. This allows ADOT to determine the CA agency’s level of compliance with the nondiscrimination regulations of 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, as amended. The On-site Review will also identify how the CA agency has effectively implemented the requirements of the Environmental Justice and Limited English Proficiency (LEP) Executive Orders, 12198 and 13166, respectively.

On-site Personnel Interviews

As part of the Title VI On-site Compliance Review, interviews will be conducted by the ADOT Civil Rights staff. Questions shall be posed to personnel to develop a fact-based description of how the agency has attempted to comply with Title VI Program requirements. At the Management level, the questions might be as simple as “What is your role in the effective implementation of Title VI Program requirements”, “How have you delegated and/or fulfilled your role”. These interviews will pertain to the roles and responsibilities within the CA agency’s Title VI Program and efforts to comply with Title VI. Questions will be based on the Title VI requirements of 23 CFR Part 200 and may refer to your Agency’s Title VI Program Implementation Plan.

Date: _____ ADOT Reviewer: _____

If extra space is needed to complete any question, attach a sheet and indicate the Section and Question to which your answer corresponds to.

I. Agency Information

Administrative Head

Title

Organization: _____

Address: _____

City: _____ State: _____ Zip Code _____ County: _____

Phone: (_____) _____ Fax: (_____) _____

Email: _____

Please list the programs receiving FHWA financial assistance from ADOT and the amounts received for the current year.

Program/Service	Dollar Amount	Recurring
_____	_____	Yes <input type="checkbox"/> No <input type="checkbox"/>
_____	_____	Yes <input type="checkbox"/> No <input type="checkbox"/>

Title VI Coordinator

Name Title

Phone: (_____) _____ Fax: (_____) _____

Email: _____

Does the Title VI Coordinator have direct access to the Director? Yes No

Does ADOT have the most current copy of your Organizational Chart? Yes No

Has the Title VI Coordinator attended an ADOT Civil Rights training session within the last three (3) years?

Yes No If yes, provide the date(s): _____

Title VI Implementation Program Plan

When was the last Title VI Program Implementation Plan submitted to ADOT? _____

Please mark the sections of the last Title VI Program Implementation Plan that were identified as deficient when the Title VI Implementation Plan was initially submitted to ADOT CRO:

Policy Statement

Standard DOT Assurances

Dissemination of Title VI Information

Limited English Proficiency (LEP)

- Organization & Staffing
- Program Review Procedures
- Special Emphasis Program Areas
- Sub-recipient Review Procedures
- Data Collection/Reporting/Analysis
- Title VI Training

- Complaint Procedures
- Environmental Justice (EJ)/
Virtual Public Involvement (VPI)
- Review of CA Agency Directives
- Compliance and Enforcement Procedures

Title VI Accomplishments and Goals Report

Since the submission of the latest Title VI Accomplishment and Goals Report, what goals have been accomplished?

Service area population (Service area population means the number of people served in the area of the Agency)

Total Population _____

Please provide the most recent demographic data for the service area in the table below.

Race/Ethnicity	Total	%	Race/Ethnicity	Total	%
African American/ Black			American Indian/ Alaskan Native		
Asian			Hispanic/Latino		
Native Hawaiian/ Other Pacific Islander			White		
Low Income Population					

Has the CA Agency developed demographic maps or charts that provide racial and ethnic data for use in the planning process? Yes No

II. Dissemination of Title VI Information

Are the Nondiscrimination Notice to the Public posters regarding Title VI located in conspicuous areas for staff and public? Yes No

Does the Nondiscrimination Notice to the Public name the Title VI Coordinator to whom complaints should be referred? Yes No

Does the Nondiscrimination Notice to the Public include procedures to request additional information about Title VI? Yes No

Please describe how information about Title VI is disseminated throughout the CA Agency and to the public.

Please describe how information about Title VI is disseminated virtually to the public.

Please describe how information about Title VI is disseminated internally to staff.

III. Training

Has Title VI training been provided to staff and/or committee members within the last twelve months?

Yes No If yes, provide the date(s): _____

Please describe the contents of the training:

Please describe how the CA Agency maintains training records:

Please describe the oversight of the Title VI training process (How does the Title VI Coordinator ensure that staff is trained on Title VI?):

IV. Limited English Proficiency (LEP)

Has your organization developed a Limited English Proficiency (LEP) plan? Yes No

(If “yes” provide documentation)

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Has the CA Agency submitted its recent copy of the LEP Plan to ADOT? Yes No

Does the LEP Plan include the required Four Factor Analysis? Yes No

Do the results of the Four Factor Analysis yielded a need to translate materials? Yes No

Is the LEP Plan reviewed annually to ensure demographic information is current? Yes No

Does the CA website provide a translation option? Yes No

Service Area Population _____

What percent of the service area population is LEP?	
What are the predominant LEP languages in your service area? (Indicate main three languages and source of data)	
How many language assistance requests were received over the last fiscal year?	
What has been the cost of any interpreter or translation services provided since last fiscal year?	

Describe the efforts the CA makes to provide meaningful access for persons with limited English proficiency in the transportation-related planning process? Also explain how the organization solicits public participation and comments from LEP persons.

V. Public Involvement/Environmental Justice

ADOT is responsible for monitoring how a CA effectively implements Title VI/Nondiscrimination requirements. The following questions are meant to demonstrate how the agency's Public Involvement acknowledges Title VI/Nondiscrimination requirements. Additionally, the following responses should demonstrate how PI ensures that all Federal Programs interact with members of the Public in a Title VI/Nondiscrimination compliant manner, please cite examples.

Does your agency have a Public Involvement plan? Yes No

(If "yes" provide documentation)

Upload

Provide documentation describing efforts to identify and involve minority and low-income individuals within your service area in the decision making process:

Provide a description of the methods used to inform minority and low-income individuals of planning efforts for transportation related services and/or improvements:

List community media sources identified that outreach minority and low-income communities utilized to ensure notification of public meetings or public review of agency documents (Include sources in languages other than English):

List any net adverse social, environmental, or economic impacts beyond typical temporary construction impacts (Ex. traffic delays that caused major detours for a prolonged period of time, noise outside of standard working hours, etc.) identified on any planned or programmed transportation-related projects during the last three years or from your last review:

Topic	Reportable Adverse Impact	No Need to Report
Traffic	Major detours or closed roads	Minor traffic delays due to lane closure
Noise	After business hours in residential	During business hours or in industrial area
Air Quality	Major dust or debris that may impact asthma or allergy sufferers	Minimal construction dust (mitigation techniques used)

Please describe how the agency evaluates impacts to minority and low-income individuals during the development of planning documents?

How are road construction activities communicated to the public? Describe format and languages other than English used:

Are messages provided in alternate languages based upon the results from the agency's Four-Factor Analysis?

Yes No

(If "yes" provide documentation)

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VI. Data Collection and Analysis

Is demographic data collected at public meetings and events? Yes No

Is the collected demographic data recorded and maintained? Yes No

Describe the methods used to collect and analyze demographic data?

Describe how demographic data is used in your organization's different program areas such as Right-of-Way, Public Involvement, Environmental Planning and Maintenance.

VII. Complaint Information

Have you provided the most recent copy of the Title VI Complaint Form to ADOT? Yes No

Are the Complaint Procedures and Complaint Form posted on the CA website? Yes No

List any Title VI complaints (basis of race, color and national origin) received during the past three years.

If complaints were received, were they investigated? Yes No

By whom? _____

If complaints were filed against the CA Agency, were they forwarded to ADOT within 72 hours? Yes No

Have you provided a copy of the Investigations, Lawsuits and Complaints Log to ADOT? Yes No

How does the CA Agency ensure that the Complaint Form has the required accommodation language?

VIII. Website

Please provide a link to your website's Title VI page: _____

Does the CA website follow the two-click rule? Yes No

Is the Nondiscrimination Notice to the Public posted on the CA website? Yes No

Are the Complaint Procedures and Complaint Form posted on the CA website? Yes No

Does the CA website contain language and disability accommodation language? Yes No

Please describe how the CA Agency ensures that the website is maintained in a nondiscriminatory manner.

Provide the name and title of the person responsible for this task? _____

IX. Compliance and Enforcement Procedures

Program Area Reviews

Please describe Title VI compliance monitoring responsibilities for the program areas of the agency.

Compliance: Solicitations and Contracts

Are contractors clearly aware of their commitment to Title VI compliance? Yes No

Describe how the agency ensures that Appendix A, Appendix E and the wording for the Statutory/Regulatory Authority statement, General Assurances and Specific Assurances text of the FHWA-version of the Title VI Program Assurance is being inserted into all consultant agreements and construction contracts regardless of tier?

How does the CA Agency ensure transportation-related solicitations and contract awards are done in a nondiscriminatory manner?

Does the CA maintain records of the race and ethnicity of bidders and those awarded contracts to ensure the process is done on a nondiscriminatory basis? Yes No

Provide the name and title of the person responsible for this task? _____

Are those awarded contracts clearly aware of their commitment to Title VI compliance? Yes No

X. Title VI Assurance

Has your agency provided the most recent Title VI Assurances signed by the agency head? Yes No
If so, please provide a copy.

Upload

XI. Declaration of Respondent

I declare that I have completed this Title VI On-site Compliance Review to the best of my knowledge and believe it to be true and correct.

Transportation Director

Date

Title VI Coordinator

Date

Please email the completed form to civilrightsoffice@azdot.gov
Additional documents may be attached to the email.