



ARIZONA DEPARTMENT OF TRANSPORTATION Title VI On-site Compliance Review Assessment Councils of Governments Metropolitan Planning Organizations

Purpose

Clear

Title 23 Code of Federal Regulations (CFR) Part 200.9 requires the State to conduct reviews of planning agencies and other recipients of Federal Highway Administration (FHWA) funds to determine compliance with Title VI, which includes Environmental Justice matters. Federal Transit Administration (FTA) Circular 4702.1B holds the State responsible for monitoring the Title VI compliance of the Councils of Governments (COG) and Metropolitan Planning Organizations (MPO).

To comply with the requirements imposed by FHWA and FTA and to ensure that COG/MPO 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 COG/MPO’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 COG/MPO 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 COG/MPO’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 FTA Circular 4702.1B and may refer to the ADOT COG & MPO Guidelines and Procedures Manual and 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 or FTA financial assistance from ADOT and the amounts received for the current federal fiscal 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? _____

Did the Executive Board approve the Title VI Implementation Program Plan? Yes No

If yes, was a copy of the minutes provided to ADOT CRO? Yes No

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:

- Standard DOT Assurances
- Nondiscrimination Notice to the Public
- Dissemination of Title VI Information
- Demographic Profile
- Organization & Staffing
- Executive Board Review Approval
- Committee Membership
- Demographic Maps
- Data Collection/Reporting/Analysis

- Limited English Proficiency (LEP)
- Public Participation Plan/Virtual Public Involvement
- Environmental Justice (EJ)
- Complaint Form and Procedures
- Title VI Training
- Compliance and Enforcement Procedures
- Program Review Procedures
- Sub-recipient Reviews

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 COG/MPO 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 COG/MPO 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 COG/MPO 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)

Upload

Has the COG/MPO 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 COG/MPO 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 COG/MPO 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

Has the COG/MPO developed a Public Involvement Plan (PIP) in accordance with USDOT Order 5620.2(a)?
Yes No

(If “yes” provide documentation)



Describe the methods used to afford minority and low-income individuals the opportunity to participate in transportation-related planning?

Explain how the mobility needs of minority and low-income individuals are identified and considered within the planning process.

Describe the COG/MPO process to identify any potential disparate effects on minority and low-income individuals during the transportation planning stages.

List any potential social, economic and environmental impacts identified during the planning stages of a transportation plan or in transportation-related projects during the last three years. What actions were taken to mitigate such impacts?

Describe any tools that the COG/MPO uses to provide minority and low-income individuals the opportunity to participate in transportation-related planning that are not included in the Public Involvement Plan.

When was the last time the COG/MPO's Public Involvement Plan was updated? _____

When does the COG/MPO anticipate to make updates to the Public Involvement Plan? _____

Explain how the Title VI Coordinator ensures Title VI elements are included in the Public Involvement Plan during the revision stage.

VI. Transportation – Related Boards Or Commissions

Does the COG/MPO select the membership of any transit-related committees, planning boards, or advisory councils? Yes No

If the response was “Yes”, please fill out the fields below.

Please provide the racial breakdown of the committee members of your Agency’s transportation-related, non-elected planning boards, committees and advisory bodies.

Body	African American/Black	Asian	American Indian/Alaskan Native	Hispanic/Latino	Native Hawaiian/Other Pacific Islander	White

How are the members of the boards or committees selected?

Describe the steps the COG/MPO has taken to encourage the participation of minorities on those boards and committees? (If the boards/committees are chosen by the COG/MPO)

VII. Demographic 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 transportation-planning process.

VIII. 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 COG/MPO 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 COG/MPO, 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 COG/MPO ensure that the Complaint Form has the required accommodation language?

IX. Website

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

Does the COG/MPO website follow the two-click rule? Yes No

Is the Nondiscrimination Notice to the Public posted on the COG/MPO website? Yes No

Are the Complaint Procedures and Complaint Form posted on the COG/MPO website? Yes No

Does the COG/MPO website contain language and disability accommodation language? Yes No

Please describe how the COG/MPO ensures that the website is maintained in a nondiscriminatory manner.

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

X. 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

How does the COG/MPO ensure transportation-related solicitations and contract awards are done in a nondiscriminatory manner?

Does the COG/MPO 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

Describe the process used to confirm that transportation-related solicitations and contracts contain the required contract language from the FHWA Title VI Program Assurances and Appendices A and E.

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

XI. Title VI Assurance

Has the COG/MPO provided ADOT with a copy of the most recently signed Title VI Assurances? Yes No

Upload

XII. 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.

Executive Director

Date

Title VI Coordinator

Date

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