



Title VI Nondiscrimination Program for MPO/COG with Federal Highway Administration & Federal Transit Administration

Presentation by ADOT External Civil Rights
June 13, 2025

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Agenda

- ADOT Compliance Oversight
- ADOT FHWA/FTA Title VI Implementation Plan Checklist
- Title VI Plan element requirements
- Goals and Accomplishments Report requirements

Title VI of the Civil Rights Act of 1964

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.”

ADOT External Civil Rights (ECR) Title VI Oversight

- Title VI Implementation Plan
- Goals and Accomplishments Report
- On-site Compliance Review
- Partnership and Technical Support
- Annual Title VI Nondiscrimination Training

Title VI Nondiscrimination Plan

- Describes your Agency's standard operating procedures for how Title VI of the 1964 Civil Rights Act is implemented in your Agency.
 - The processes for your Agency's programs and activities in relation to Title VI.
- User friendly and accessible to members of the public
- Updated annually

Title VI Nondiscrimination Plan

- Policies and procedures for implementation in the current State Fiscal Year
 - State Fiscal Year 2026 Plan
 - July 1, 2025 - June 30, 2026
 - Due to ADOT ECR on August 1, 2025

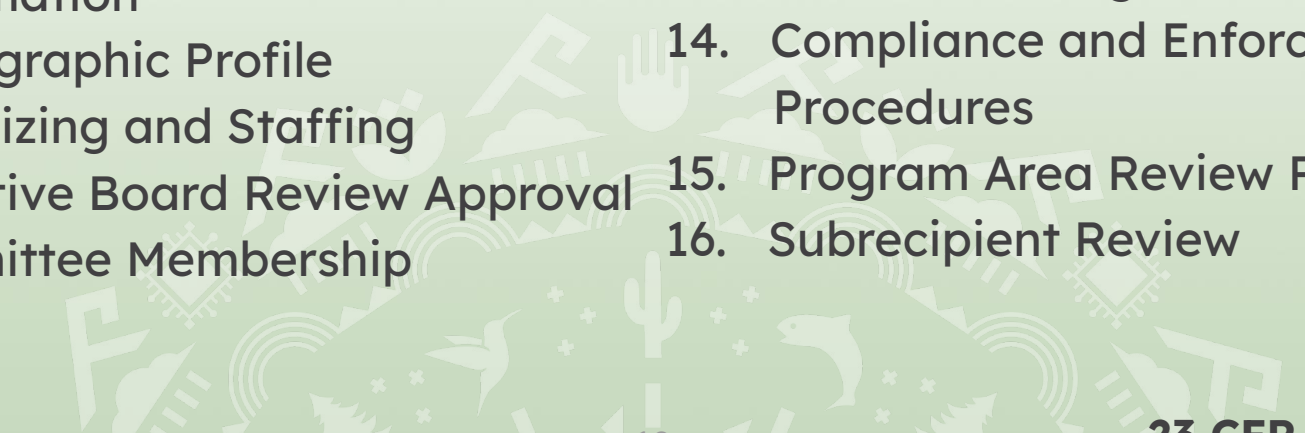
Title VI Plan Requirement

- ADOT FHWA and FTA Title VI Requirements
 - 23 CFR 200.9
 - USDOT Order 1050.2A Assurances
 - 42 USC 2000d
 - 49 CFR. 21.5(b)
 - FTA Circular 4702.1B
- ADOT FHWA/FTA Title VI Implementation Plan Checklist

ADOT FHWA/FTA Title VI Implementation Plan Checklist - Updates

- Additional details to provide greater clarity
- The requirement for Environmental Justice has been removed, due to the rescission of Executive Order 12898 (Environmental Justice).

Title VI Plan - Elements

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1. Policy Statement
 2. Standard DOT Assurances
 3. Notice to the Public
 4. Dissemination of Title VI Information
 5. Demographic Profile
 6. Organizing and Staffing
 7. Executive Board Review Approval
 8. Committee Membership
 9. Demographic Maps
 10. Data Collection/Reporting/Analysis
 11. Public Participation Plan
 12. Complaint Form and Procedures
 13. Title VI Training
 14. Compliance and Enforcement Procedures
 15. Program Area Review Procedures
 16. Subrecipient Review

1. Policy Statement

The Policy Statement:

- Prohibits discrimination in access to benefits, services, and programs receiving FHWA & FTA federal funding
- Ensures an equal opportunity for all individuals



1. Policy Statement

- Circulated throughout the organization and made available to the public
- **The Policy should be signed by the Executive Director or Director of Transportation**
- **Includes basis of Title VI (race, color, national origin)**

2. USDOT Order 1050.2A Assurances

- The agency is assuring FHWA and ADOT that the Agency will adhere to the nondiscrimination policies
- Enforces Title VI compliance procedures
- Prevents Discrimination



2. USDOT Order 1050.2A Assurances in Title VI Nondiscrimination Plans

- Attach the most recently signed USDOT Assurances, including Appendices
- Signed annually, by the head of Agency
 - Head of the operating administration
 - Transportation Director
 - Chief Executive Officer

2. USDOT Order 1050.2A Assurances in FHWA funded contracts

All FHWA funded contracts should include the required Title VI language from USDOT 1050.2A.

1. Attach Appendix [A](#) and [E](#) to all contracts that are federally funded
2. Attach Appendix B, C, & D when applicable (Real Estate)
3. Title VI language paragraph (from page 2 of the USDOT 1050.2A Assurances)

2. USDOT Order 1050.2A Assurances

Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A



USDOT Order 1050.2A Assurances

- Agencies who submitted their signed assurances to MPD
 - Signed assurances in your Title VI plan for the upcoming submittal date of August 1, 2025
 - Current signed assurances for this year.

3. Notice to the Public

- Informs members of the public of the protections against discrimination afforded to them by Title VI.
- Method to file a Title VI complaint



3. Notice to the Public

- Include the name and contact information of the Title VI Coordinator
- Indicate where in the office the notice(s) of the public is located. Example: front desk, lobby, etc



3. Notice to the Public

- Include basis of Title VI (race, color, national origin)
- Include information on filing a Title VI complaint



4. Disseminate Title VI Information



- Public Outreach
 - Describe how your Agency provides Title VI information to the public in all its activities
- Language Assistance
 - Describe how it is disseminated in additional languages, as needed

4. Disseminate Title VI Information



- Public Outreach
 - Describe your Agency's processes to inform the public of Title VI information
 - Informing the public of the protected basis under Title VI and in turn for the project or study utilizing the FHWA or FTA funds.
 - Information on how to file a Title VI complaint against a project or study

4. Disseminate Title VI Information



- Public Outreach
 - Describe the tools, techniques, and strategies used to involve and educate the public of the project or Title VI information
 - Notice to the Public
 - Describe how your Agency conducts Title VI compliance in virtual public participation

ADOT's Notice of Availability of Reasonable Accommodations Language

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, **ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability.** Persons that require a reasonable **accommodation based on language** or disability should **contact [contact name] at 855.712.8530 or projects@azdot.gov.** Requests should be made **as early as possible** to ensure the State has an opportunity to address the accommodation.

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la...

4. Disseminate Title VI Information



- Language Assistance
 - Indicate how the agency informs the public that translation and interpretation services can be available.
 - There should be no indications that language assistance will only be available if requested within a specified time frame.
 - Language services should be available, if requested.

4. Disseminate Title VI Information



- Language Assistance
 - The Title VI Plan should include a Four Factor Analysis for the Agency's boundaries.
 - The Title VI Plan should include a statement that a Four Factor Analysis will be conducted on a project by project basis.

4. Disseminate Title VI Information



- Language Assistance
 - Conduct a Four Factor Analysis for the Agency's boundaries.
 - Languages can be gathered using the U.S. Census Bureau table C16001:
<https://data.census.gov/>
 - This data should be renewed annually.
 - Take note of any languages that meet the *Safe Harbor Threshold.

4. Disseminate Title VI Information

- Language Assistance
 - Safe Harbor Threshold - five percent (5%) or 1,000 persons, whichever is less, of the total population

Flagstaff, AZ

Pop: 72,880

5% is: 3,644

1,000 or 3,644

Miami, AZ

Pop: 1,354

5% is: 67

1,000 or 67

Tools for Ensuring Language Assistance

I speak ...

A

Amharic

እኔ አማርኛ ነው ምናገረው.

Arabic

أنا أتحدث اللغة العربية

Armenian

Ես խոսում եմ հայերեն

B

Bengali

আমি বাংলা কথা বলতে পারি

Bosnian

Ja govorim bosanski

Bulgarian

Аз говоря български

Burmese

ကျွန်တော်/ကျွန်မ မြန်မာ လို မြောက်တယ် ဟုတယ်

3



- Translated materials
- I-Speak cards
- Volunteer Bilingual staff
- Vendors for interpretation/translation services
- Online translating resources

4. Disseminate Title VI Information

- Language Assistance

Below are the Four Factors involved in the analysis:

1. Demography - where you gather the data
2. Frequency - determine frequency of the language(s)
3. Importance - determine the importance of the program/activity
4. Resources - what resources are available to your Agency, or available for your project

4. Disseminate Title VI Information - U.S. Census Bureau table C16001

- Language Assistance
 - Languages can be gathered using the U.S. Census Bureau table C16001:
<https://data.census.gov/>
 - Demonstration
 - Kingman, AZ
 - Project boundaries

5. Demographic Profile

- Provides a summary of various factors of who are the people who are going to potentially be affected by the agency's projects.



5. Demographic Profile

- A demographic profile of the agency

6. Organization & Staffing

- This section describes the roles that support the Agency's Title VI program
- Who can be included in the Organization and Staffing section?
 - Staff that work with the public with projects or studies
 - Staff that receive Title VI complaints
 - Staff that assist with Title VI compliance oversight



6. Organization & Staffing

- Identify the Title VI Coordinator within the Agency
- Show how the Title VI Coordinator has direct access to the head of the agency
- Include an Organizational chart
 - Demonstrates the placement of the Title VI Coordinator
 - Includes the name of the Title VI Coordinator

7. Executive Board Review Approval

- Demonstrates the Board's consideration, awareness, and approval of the Agency's Title VI Plan

7. Executive Board Review Approval



- The plan must include a statement that the Executive Board or Regional Council must review and approve the Title VI Implementation Plan
- A copy of the minutes indicating such approval must be provided

8. Committee Membership

Description of the process used to encourage the participation of minorities on its committees

- Agency to summarize efforts they use to include minorities within their agency



8. Committee Membership

- List all committees and councils.
- Describe the functions on the committee
- Include the manner that committee members are selected to the committee.

8. Committee Membership



- If your Agency selects the committee members:
 - Include a table of all committee and council members, broken down by race
 - Include a description of the process used to encourage the participation of minorities on its committees



8. Committee Membership

- If your Agency does not select the committee members:
 - The Agency does not need to provide a table including race and the description of the participation process of minorities

9. Demographic Maps

- This section should demonstrate the distribution of federal funds in the Agency.



9. Demographic Maps

Include at least one of the following:

- Maps that show the locations of the distributed funds during the previous year
- Maps that show the locations of the distributed funds for the current or upcoming year.

FTA Title VI C 4702.1B IV-3, IV-7-8, IV-15, V-1, Appendix I

10. Data Collection & Analysis



Data Collection

- Describe how the agency collects Title VI data for all program areas in the Agency's FHWA/FTA Title VI program
- Detail what data is collected from each program area

10. Data Collection & Analysis



Data Analysis

- **Title VI Data Analysis involves pairing**
 - Demographic Data + Impact or Benefit
- Explain how Title VI collected data is analyzed/interpreted for Title VI compliance or potential patterns of discrimination

FHWA Data Analysis (Resource)

FHWA website includes a sample data source that gives examples on Title VI data collection and analysis.

[FHWA Title VI Data Source Assessment](#)

10. Data Collection & Analysis - Title VI Analysis

- Example from FHWA Data Resource

Data Description	Public Involvement - Project Area Demographics
External Source	U.S. Census - 5 Year
Title VI Analysis Description	Data is used to compare meeting attendee demographics with the demography surrounding the project.

10. Data Collection & Analysis - Title VI Analysis

- Example from FHWA Data Resource

Data Description	Professional Services Contracts -Selection and Award
External Source	None
Title VI Analysis Description	Data and information used to assess nondiscrimination in the selection and award process. Demographics of all proposers compared to selectees.



11. Public Participation Plan

Public Participation Plan:

- Link to your Agency's public participation plan
- Include the sections from your Agency's Public Participation Plan that discuss outreach methods in additional languages, as needed
- Summary of outreach efforts

Virtual Public Involvement (VPI):

- Describe how your Agency conducts Title VI compliance in virtual public participation

12. Complaint Procedures

- This section describes how the Agency will ensure prompt processing of Title VI complaints
- All Title VI complaints should be forwarded to ADOT, within 72 hours.

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E



12. Complaint Procedures

- Complaint must be filed within 180 days of the alleged discriminatory actions
- Complaints should be in writing and signed; they may be filed by mail, fax, in person, or e-mail
 - Complainant can call the agency to have the complaint allegations transcribed

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E



12. Complaint Procedures

- Include the Agency and ADOT ECR contact information
 - FHWA procedures should include FHWA contact information
 - FTA procedures should include FHWA contact information
- Include a copy of the Title VI complaint form

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E



12. Complaint Procedures

- Attach a sample log
 - log and track transit related Title VI investigations, complaints, and lawsuits over the past three years

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E



12. Complaint Procedures

FTA Complaint Procedures

- Agencies must establish and detail the procedures for investigating the complaint and tracking its status:
 - The jurisdiction of a received complaint
 - If Agency will accept
 - If further information is needed from the complainant

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E



12. Complaint Procedures

FTA Complaint Procedures

- Once the determination has been for the Agency to accept the complaint for investigation, ECR should be notified within 72 hours.
- Include a complaint form in any language that meets the Safe Harbor Threshold for the Agency
- Agency will make a prompt investigation upon receipt of a complaint

23 CFR 200.9(b)(3), FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E

13. Title VI Training

- All Agencies should provide Title VI Training to their pertinent staff, annually
 - Staff that interact with the public
 - Staff that work with projects
 - Staff that oversee contracts
 - This can include consultants, subrecipients, or contractors



13. Title VI Training

- Include the training topics, frequency of training, and who will facilitate the training
 - Include the process for new employees, if available
 - Title VI training topics can include
 - Complaint procedures
 - Language assistance procedures for your Agency
 - Data collection processes (self-id surveys)



13. Title VI Training

- Describe how consultants are informed of the Agency's Title VI processes
 - Consultants who are doing work on behalf of the Agency should follow the Agency's Title VI Nondiscrimination Plan

14. Compliance and Enforcement Procedures

This section should include how the Agency will:

- Identify, address, and eliminate discrimination if found to exist
- Ensure staff members adhere to the Agency's standards, and internal policies.

14. Compliance and Enforcement Procedures

- Prevent violations, detects any instances of non-compliance, and takes appropriate actions to address violations and ensure long-term adherence



14. Compliance and Enforcement Procedures

- Describe how the Agency:
 - Identifies the trends and patterns of discrimination.
 - Will address deficiencies or when noncompliance is determined.



15. Program Area Review Procedures

- This section should describe the Agency's process to conduct Title VI reviews of each of its program areas that receive FHWA or FTA funds
 - The program area review should describe how each of its program areas' Title VI effectiveness will be measured.



15. Program Area Review Procedures

- Describe each program area in the Agency's Title VI program
 - *Example:*
 - Contracts and Procurement
 - Communications
 - Regional Transportation Planning (RTP)
 - Project review

23 CFR 200.9(b)(5),(6) & (13), 23 CFR 200.9(a)(4)



15. Program Area Review Procedures

- Describe the steps/process that will be followed for a program area review.
 - What activities will be reviewed for the program
- Include when the program review will be conducted, how often, and by whom.

23 CFR 200.9(b)(5),(6) & (13), 23 CFR 200.9(a)(4)



15. Program Area Review Procedures

- Describe how each program will be reviewed for effectiveness with Title VI.
 - Example: Review if Agency Title VI processes are being followed for:
 - public involvement
 - FHWA/FTA funded contracts
 - Title VI trainings of staff, consultants, subrecipients

16. Subrecipient Review Procedures

- This section should describe the Agency's process to ensure Title VI compliance of the Agency's subrecipients.
- This section is required even if the Agency does not currently have any subrecipients.

16 Subrecipient Review Procedures



- List all of the Agency's subrecipients
- Include how often subrecipients are reviewed
- Describe the types of reviews and its purpose

16 Subrecipient Review Procedures



- Describe the activities reviewed
 - What specific activities will be reviewed
 - How will the review determine effectiveness
- Describe how and when subrecipients will receive Title VI training from the Agency
 - When will the Agency provide Title VI training or technical support to their subrecipient

Implementation Plan Wrap-Up

- Plan should have the submittal date, and the effective date
- Plan should contain the Agency Title VI Standard Operating Procedures (SOP)
- Agencies will submit a Plan every year, with newly signed FHWA Title VI Assurances and Policy Statement

Implementation Plan Wrap-Up

- A Four Factor Analysis should be included and updated annually
- Publish the ADOT External Civil Rights approved Title VI Nondiscrimination Plan on your Agency's public website

Revisions to Implementation Plan

- ECR will email the Title VI Coordinator with the completed checklist
- Meet with Civil Rights Specialist to review checklist items
- Submit updated Plan to ECR

ADOT External Civil Rights (ECR) - Contact Information

- Please update any of your Title VI or ADA documents (e.g. Complaint procedures) that refer to ADOT Civil Rights Office to:
 - ADOT External Civil Rights
 - Address: 1801 W. Jefferson Street, Suite 101, Mail Drop #154A, Phoenix, AZ 85007
 - Phone: 602-712-8946
 - Please remove fax number

ADOT External Civil Rights (ECR) - Contact Information

- Within the Title VI Plan update ADOT Civil Rights Office (CRO) to ADOT External Civil Rights (ECR)

Preliminary Review of the Title VI Implementation Plan

- If you would like ECR to conduct a preliminary review of your Agency's Title VI plan please submit the Title VI Plan draft by June 20, 2025.
- If your Agency has been selected for an ECR on-site review, your Agency is ineligible to receive a preliminary review for this year, as your review is in progress.

Goals and Accomplishments Report

- The “Annual Goals and Accomplishments Report” is where updates and accomplishments should be stated.
- Prepare a yearly report of Title VI **accomplishments** for the past year and **goals** for the next year

Accomplishments should include:

1. **Program Area Reviews** - Number of reviews, results, and actions taken; any corrective actions being taken
2. **Subrecipient Reviews** - Number of reviews, results, and actions taken

Accomplishments should include:

3. **Training** - Number of trainings, topics covered, audience, number of attendees, and follow up (if any)
4. **Title VI Complaints** - Summary for each complaint with current status

Goals should include:

1. Number of reviews planned for the next year
 - Program Area Reviews
 - Sub-recipient Reviews
2. Number and description of sessions planned for Title VI training
 - Internal (to Agency staff)
 - External (has the Title VI Coordinator attended any trainings)

Goals should include:

3. Any other Title VI related goals the Agency anticipates for the upcoming year



Important Dates

- Preliminary Reviews through June 20, 2025
- Implementation Plan due August 1, 2025
 - Assurances must be signed each year
- Goals and Accomplishments due August 1, 2025



Contact US

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