



# **Project Delivery Academy**

**Employee and Business Development  
External Civil Rights**

# External Civil Rights Program Updates

- Realigned to Employee and Business Development (EBD), ADOT External Civil Rights promotes equal access and participation to all individuals.
  - ADA/504 Program
  - Title VI Program
- External Civil Rights and ADOT policies and procedures govern how ADOT provides services to our employees, customers, stakeholders and the general Arizona population.

# What we do?

Work with ADOT employees, supervisors, managers, division administrators, subrecipients, grantees, external partners, contractors and local governments to ensure that: No member of the public is excluded from participation, denied benefits, or subjected to discrimination under any ADOT sponsored program or activity.



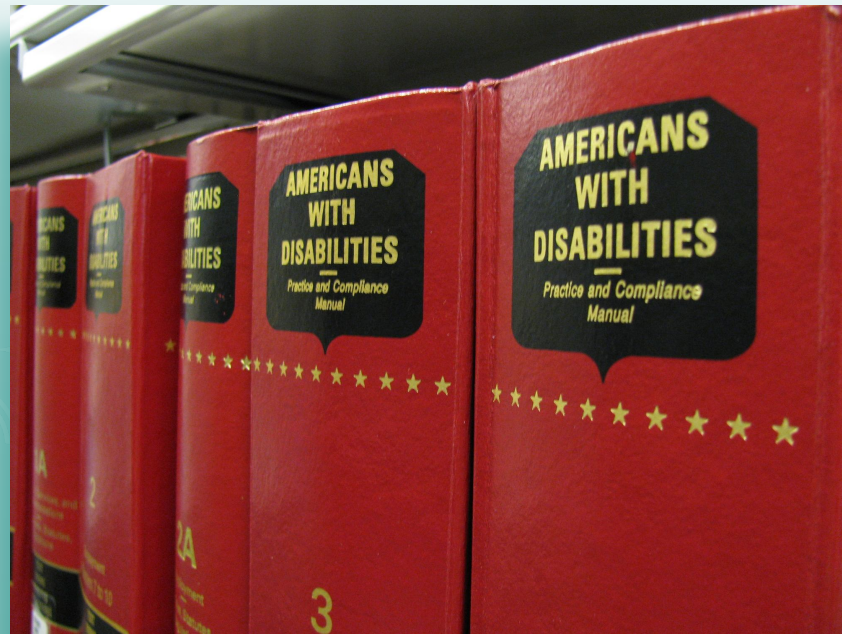
# ADA Authorities

- As a State Transportation Agency, ADOT has a responsibility to ensure that all of its facilities, programs, services, activities, to include construction projects fully comply with the provisions of Title II of the ADA and Section 504 of the Rehabilitation Act of 1973.
- Prohibits discrimination and ensures equal opportunity and access for persons with disabilities.



# ADOT External ADA Policy

This policy applies to all ADOT programs, services, and activities as carried out by ADOT employees and other individuals who are part of ADOT's workforce.



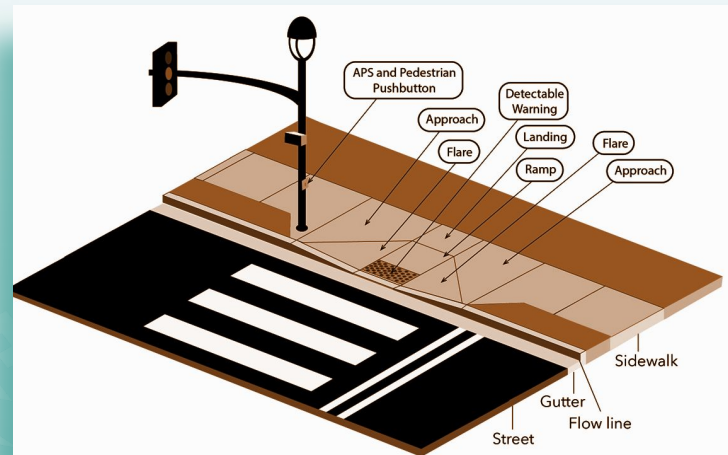
# ADA Public Modifications

- Take reasonable steps or ensure that reasonable steps are taken to grant meaningful access.
- Ensure ADA modification requests are provided timely to avoid discrimination. The time depends on factors such as the type of modification requested.
- Failure to provide modifications that can easily be provided may result in a denial of equal or meaningful access.



# ADA Project Delivery

- ADOT must incorporate ADA and Section 504 accessibility requirements.
- Partner work to ensure that features such as curb ramps, truncated domes, and barrier-free sidewalks meet accessibility standards and are incorporated into ADOT's projects.
- Ensure projects that involve alterations to existing roadways, existing pedestrian facilities within project limits are reviewed to determine whether they meet ADA/504 regulations or warrant improvements in order to meet ADOT's ADA Design Standards.



# ADA Tracking & Monitoring

## ADA Feasibility Reports:

- Must be completed for projects that have ADA features being added, updated and modified within the project work limits.
- The reports are updated throughout project delivery and completed prior to close out.

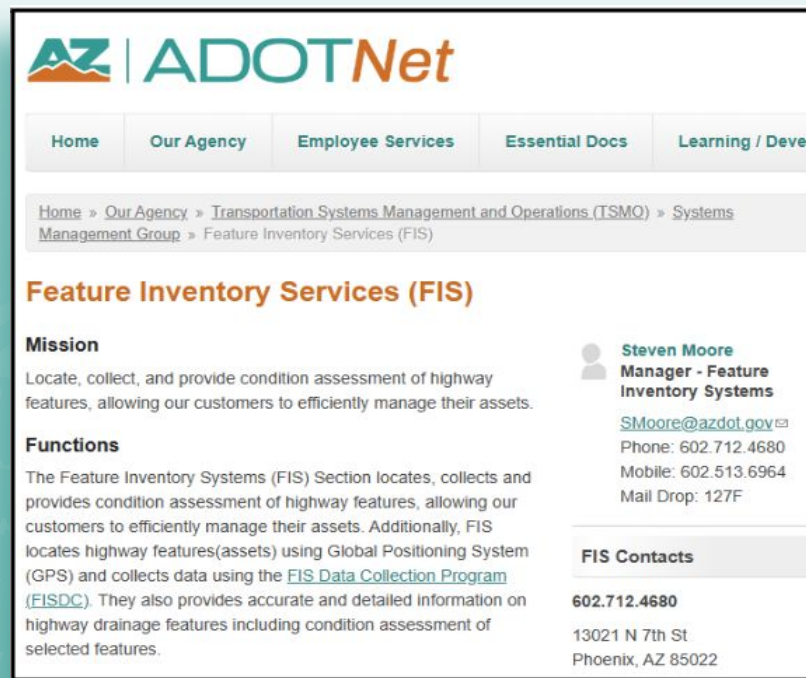




# ADA Tracking & Monitoring

## Features Inventory System (FIS):

- Track/Monitor ADA barriers as part of the FIS. The system is accessible to all ADOT employees.
- Evaluate ADA features in the field throughout project delivery.
- Submit ADA update requests to Systems Management to update ADOT's FIS system of record.



The screenshot displays the ADOTNet website interface. At the top is the ADOTNet logo. Below it is a navigation bar with links: Home, Our Agency, Employee Services, Essential Docs, and Learning / Development. A breadcrumb trail reads: Home » Our Agency » Transportation Systems Management and Operations (TSMO) » Systems Management Group » Feature Inventory Services (FIS). The main heading is "Feature Inventory Services (FIS)". Under "Mission", it states: "Locate, collect, and provide condition assessment of highway features, allowing our customers to efficiently manage their assets." Under "Functions", it states: "The Feature Inventory Systems (FIS) Section locates, collects and provides condition assessment of highway features, allowing our customers to efficiently manage their assets. Additionally, FIS locates highway features/assets using Global Positioning System (GPS) and collects data using the [FIS Data Collection Program \(FISDC\)](#). They also provides accurate and detailed information on highway drainage features including condition assessment of selected features." On the right, a profile for Steven Moore, Manager - Feature Inventory Systems, is shown with contact information: [SMoore@azdot.gov](mailto:SMoore@azdot.gov), Phone: 602.712.4680, Mobile: 602.513.6964, and Mail Drop: 127F. At the bottom right, a box titled "FIS Contacts" lists: 602.712.4680, 13021 N 7th St, Phoenix, AZ 85022.

# Title VI

“No person in the United States shall, on 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 program or activity receiving Federal Financial Assistance.”

# Title VI Policy and Guidance

- PER-18.01 Title VI External Nondiscrimination & Open Meeting Policy
- ADOT FHWA Title VI Implementation Plan
- ADOT Language Access Plan
- ADOT Public Involvement Plan

## ARIZONA DEPARTMENT OF TRANSPORTATION POLICIES AND PROCEDURES

### PER-18.01 TITLE VI EXTERNAL NONDISCRIMINATION AND OPEN MEETING POLICY

Effective: December 15, 2023  
Supersedes: PER-18.01(8/4/2021)  
Responsible Office: Civil Rights (602) 712-8946

Review: December 15, 2025  
Transmittal: December - 2023  
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#### 1.1 PURPOSE

This policy implements the requirements of Title VI of the Civil Rights Act of 1964 (Title VI), and the U.S. Department of Transportation's implementing regulations 49 CFR Part 21. This policy also describes ADOT's policy on nondiscrimination in its programs, services and activities as well as open meeting requirements.

#### 1.2 SCOPE

This policy is applicable to all ADOT employees and their program areas, participants, sub-recipients, contractors and beneficiaries of ADOT's programs, services and activities.

#### 1.3 AUTHORITY

Title VI of the Civil Rights Act of 1964  
Age Discrimination Act of 1975  
Airport and Airway Improvement Act of 1982  
Americans with Disabilities Act of 1990  
Arizona's Open Meeting Law, A.R.S. §§ 38-431 through 431.09  
Executive Order 12898 (Environmental Justice)  
Executive Order 13166 (Limited-English Proficiency)  
The Civil Rights Restoration Act of 1987  
The Federal-Aid Highway Act of 1973  
Title II of the ADA  
Section 504 of the Rehabilitation Act of 1973  
USDOT Order 1050.2A  
49 CFR Part 21  
Title IX of the Education Amendments Act of 1972

# Title VI Compliance and the Project Delivery Process

Working with ADOT program areas to ensure Title VI compliance:

- Contracts
- Public Outreach
  - Public Meetings
  - Language Assistance
  - Publicly Disseminated Documents



# Title VI Compliance and the Project Delivery Process

- Contract Review
- Document Review
  - Project Public Involvement Plans (PIP)
  - Four Factor Analysis Reviews
  - Post Public Meeting Summary Reviews
  - Collateral Reviews
  - Quarterly Reports
  - Environmental Document Reviews



# Title VI Liaison Program

- Title VI Liaisons act as the cornerstone of ADOT's Title VI compliance oversight.
- Helps ensure all ADOT policies, procedures, and practices are compliant with federal statutes, agency guidelines and regulations.





# Title VI Liaison Program Activities

Liaisons assist in the following activities

- Completing and submitting quarterly reports
- Ensures demographic data is collected
- Coordinates with program team members and the Title VI Team
- Ensures adequate training of staff regarding Title VI requirements
- Assist in identifying and developing procedures to address potential or existing Title VI concerns

## ADA & Title VI

- All persons conducting business with ADOT must be notified of their rights under ADA and Title VI.
- All persons conducting business with ADOT must be notified of the availability of auxiliary aids and services.
- All customer or public complaints of discrimination against ADOT or ADOT subrecipients must be immediately reported to the ADOT's ADA or Title VI Coordinators.
- Consult with the ADOT's ADA Coordinator when processing reasonable accommodations for individuals with disabilities and before denial of any accommodation request.



## AUXILIARY AIDS AND SERVICES

In compliance with Title II of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, the Arizona Department of Transportation (ADOT) does not discriminate against qualified individuals with disabilities on the basis of disability in its programs, services, and activities.

ADOT will make reasonable modifications to ensure that individuals with disabilities have an equal opportunity to enjoy ADOT's programs, services, and activities.

If you require an accommodation please notify an ADOT staff member.

For additional information or questions about ADOT's External ADA Program, please contact ADOT Civil Rights at 602.712.8946.



## SERVICIOS Y ASISTENCIA ADICIONAL

En cumplimiento con el Título II de la ley de ciudadanos Americanos con Discapacidades (ADA por sus siglas en inglés) y la Sección 504 de la Ley de Rehabilitación de 1973, el Departamento de Transporte del estado de Arizona no discrimina contra individuos con discapacidades en sus programas, servicios y actividades administrados por el departamento.

ADOT hará modificaciones razonables para asegurar que individuos con discapacidades tengan las mismas oportunidades de disfrutar y participar en todos los programas, servicios y actividades de ADOT.

Las personas que requieran asistencia o una adaptación razonable por discapacidad por favor infórmele a un empleado de ADOT.

Si tiene cualquier pregunta o desea más información sobre el programa de no discriminación de ADOT, por favor póngase en contacto con la Oficina de Derechos Civiles de ADOT al 602.712.8946.



## ADOT'S NONDISCRIMINATION NOTICE TO THE PUBLIC

The Arizona Department of Transportation (ADOT) hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act of 1990 (ADA), and other related authorities in all of its programs and activities.

ADOT's Title VI and ADA Programs require 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 program or activity.

Any person, who believes his/her Title VI or ADA rights have been violated, may file a complaint. Any such complaint must be in writing and filed with ADOT Civil Rights within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For additional information about ADOT's Civil Rights programs and the procedures to file a complaint contact ADOT Civil Rights via the information listed below:

## AVISO PÚBLICO DE LA LEY DE NO-DISCRIMINACIÓN DE ADOT

El Departamento de Transporte del Estado de Arizona (ADOT) informa al público que esta agencia tiene como regla asegurar el cumplimiento total del Título VI de la Ley de los Derechos Civiles de 1964, del Título II de la Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA) y otras normas relacionadas con todos sus programas y actividades.

Los programas del Título VI y ADA de ADOT exigen que a ninguna persona se le excluya de participar, se le nieguen beneficios o de ninguna otra manera sea sujeta a discriminación en ningún programa o actividad de ADOT por motivo de raza, color, país de origen, o discapacidad.

Cualquier persona que crea que se han violado sus derechos bajo el Título VI o el ADA, puede presentar una queja. Esta queja debe presentarse por escrito a la Oficina de Derechos Civiles de ADOT dentro de ciento ochenta (180) días a partir de la fecha en que se alega que ocurrió la discriminación. Para recibir más información sobre los programas de Derechos Civiles de ADOT y los procedimientos para presentar una queja, por favor póngase en contacto con la Oficina de Derechos Civiles de ADOT a través la información que aparece abajo:

**KRYSTAL SMITH**  
ADA/504 Nondiscrimination Program Coordinator  
KSmith2@azdot.gov

**DANIELLE VALENTINE**  
TITLE VI Nondiscrimination Program Coordinator  
DValentine@azdot.gov

**ADOT Civil Rights**  
1801 W. Jefferson St.  
Phoenix, AZ 85007  
602.712.8946  
CivilRightsOffice@azdot.gov

# ADA/Title VI Public Complaint Procedures

- Any member of the public that believes they have been subjected to discrimination on the basis of race, color, national origin, or disability may file a formal complaint with ADOT.
- If you receive a Title VI complaint contact External Civil Rights.
- Please direct any member of the public with a Title VI complaint to ECR or the ADA/Title VI complaint form: Discrimination Complaint
- Complaints must be filed in writing, within 180 days of last incident of discrimination.

# ADA/Title VI Discrimination Complaint Form

The Complaint Form may be accessed electronically on our ADOT Civil Rights external website:

<https://azdot.gov/business/civil-rights>

# Questions?





# ADOT External Civil Rights

1801 W. Jefferson St, Ste 101  
Phoenix, AZ 85007

ECR: 602.712.8946

[Civilrightsoffice@azdot.gov](mailto:Civilrightsoffice@azdot.gov)

[ADA@azdot.gov](mailto:ADA@azdot.gov)

[TitleVI@azdot.gov](mailto:TitleVI@azdot.gov)

