

Arizona Department of Transportation External Civil Rights

TITLE VI Nondiscrimination Program FFY2026 Title VI Implementation Plan



Jennifer Toth
ADOT Director

Teresa Welborn
Deputy Director/ Chief Operating Officer

Florentina Samartinean
Employee and Business Development, Administrator

Lucy Schrader
External Civil Rights Manager

If information is needed in another language, please contact ADOT External Civil Rights at (602) 712-8946. Si se necesita información en Español, por favor comuníquese con Programas Externos de Derechos Civiles de ADOT al (602) 712-8946.

October 1, 2025

This Title VI Nondiscrimination Implementation Plan (Title VI Plan) includes ADA and other protected classes outside of Title VI as protections within ADOT's Title VI Nondiscrimination Program (Title VI Program), however the plan is designed to serve as standard operating procedures on how the Arizona Department of Transportation (ADOT) External Civil Rights (ECR) ensures Title VI compliance and oversight throughout ADOT's FHWA funded programs and activities in accordance with 23 Code of Federal Regulation (CFR) 200.9. This document will be updated annually to reflect changes in law, administration, regulations, and/or policy. This document is intended to provide guidance to department personnel and other interested entities and is not intended to, does not and may not be relied upon to create any right or benefit enforceable by law by a party against the department.

A digital copy of this Plan can be found at: <https://azdot.gov/business/title-vi-program>

If you need this information in alternate formats please contact the External Civil Rights:

**ADOT External Civil Rights
Title VI/ADA Program Coordinator
MD 154A, 1801 W. Jefferson St, STE 101
Phoenix, AZ 85007
Phone: (602) 712-8946
Email: civilrightsoffice@azdot.gov**

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ADOT OVERVIEW

ADOT is a multimodal transportation agency serving one of the fastest-growing areas of the country. ADOT is responsible for planning, designing, constructing, maintaining, and operating the state's highway transportation system. In addition, the Department provides driver's license and registration services, is responsible for commercial vehicle enforcement and registration compliance, operates the Grand Canyon National Park Airport, and maintains the state fleet.

ADOT is funded by the people who drive or own private and commercial vehicles, purchase fuel, or use transportation services. Individuals and businesses invest money through fuel taxes, motor carrier fees, vehicle title, registration, and license fees to build and operate the state's transportation systems. In addition, ADOT is also annually awarded federal funds by the United States Department of Transportation (USDOT), including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), National Highway Traffic Safety Administration (NHTSA), Federal Aviation Administration (FAA), and Federal Motor Carrier Safety Administration (FMCSA) to help support ADOT's agencies and programs, and their continued growth.

With the support of USDOT, ADOT has developed a transportation system that creates job opportunities through the planning, construction, and maintenance of its projects and other innovative ideas. These projects, in turn, generate economic development and attract a varied workforce to join our community. ADOT consistently strives to successfully deliver a range of transportation projects through the efficient use of funds and the annual proposed budgets.

As a recipient of federal funds through USDOT, ADOT is held to a standard of nondiscrimination as further described in this document. These guidelines, identified as Title VI Nondiscrimination Implementation Plan (Title VI Plan), were developed in accordance with federal compliance guidelines. Furthermore, this Title VI Plan is shared with internal ADOT department directors and external agency administrators as part of implementation and to ensure continued compliance.

To request further information, please contact the Title VI Nondiscrimination Program Coordinator:

Title VI Nondiscrimination Program Coordinator
MD 154A, 1801 W. Jefferson St, STE 101
Phoenix, AZ 85007
Phone: (602) 712-8946
Email: civilrightsoffice@azdot.gov

1. INTRODUCTION

A. Policy Overview and Objectives

In compliance with Title VI of the Civil Rights Act of 1964 (Title VI), ADOT assures through its policies and procedures that no person shall on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any ADOT or ADOT sponsored program or activity. In addition to Title VI, ADOT's Title VI Nondiscrimination Program (Title VI Program) extends protections under the following Nondiscrimination statutes: Section 162 (a) of the Federal Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (disability) and Airport and Airway Improvement Act of 1982 (49 U.S.C. 47123) (creed). While ADOT receives funds from various sources, there is no distinction between the sources of funding. Questions about ADOT's Title VI Program may be directed to:

Title VI Nondiscrimination Program Coordinator
MD 154A, 1801 W. Jefferson St, STE 101
Phoenix, AZ 85007
Phone: (602) 712-8946
Email: civilrightsoffice@azdot.gov

ADOT Title VI Program objectives:

- To be transparent with the public on ADOT's standard operating procedures to ensure nondiscrimination in all ADOT programs and activities.
- To assign and clarify roles, responsibilities, and procedures for ensuring compliance with Title VI and all related nondiscrimination statutes.
- To ensure that all participants and beneficiaries affected by ADOT's programs, projects, and activities receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin.
- To bring awareness to all ADOT employees, including consultants and contractors performing work on behalf of ADOT of their roles and responsibilities under Title VI in all ADOT programs, services, and activities, regardless of funding source.
- To establish procedures for identifying and eliminating discrimination when found to exist.
- To establish ADOT processes for conducting Title VI internal program area and subrecipient reviews to determine effectiveness of the area's compliance activities at all levels.
- To establish ADOT compliance and enforcement procedures to address deficiencies when noncompliance is determined for internal program areas and subrecipients.
- To describe the procedures for processing complaints filed by persons who believe that they have been subjected to discrimination under Title VI law.

B. Standard DOT Title VI Assurances

ADOT's Standard USDOT Title VI Assurances are in accordance with USDOT order 1050.2A. The ADOT Director signed FY2026 Assurances and they can be found at this link: <https://azdot.gov/business/title-vi-program>.

ADOT is aware that EO 12898 (EJ) and EO 13166 (LEP) have been rescinded; however, the Standard USDOT Title VI Assurance template in accordance with USDOT order 1050.2A has not been updated by FHWA. ADOT's Director will sign the updated Title VI Assurance template when provided to ADOT by FHWA.

C. Policy Statement

TITLE VI AND THE EXTERNAL AMERICANS WITH DISABILITIES ACT (ADA) NONDISCRIMINATION POLICY STATEMENT

The Arizona Department of Transportation (ADOT), as policy, assures nondiscrimination compliance on the grounds of race, color, national origin and disability as provided by Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act, Title II of the ADA and the Code of Federal Regulations 49 § 21, and Code of Federal Regulations 23 § 200.

No person will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any ADOT program or activity. Every effort will be made to ensure nondiscrimination in all of its programs, services, and activities, whether federally funded or not. ADOT's subrecipients, grant recipients, contractors and entities authorized to conduct business on behalf of the agency must also comply with this policy.

The External Civil Rights (ECR) and ADOT program areas will work closely to implement their mutual Title VI and external ADA nondiscrimination program responsibilities. Furthermore, each program area will take full responsibility for preventing discrimination and ensuring nondiscrimination compliance in all ADOT programs and activities.

The Director signs assurances and delegates full authority through Employee and Business Development (EBD) to the ECR and the Title VI/ADA Nondiscrimination Program Coordinators to oversee and implement external ADA and Title VI regulations.



Jennifer Toth
ADOT Director

10/01/2025

Date

D. Delegation of Authority

TITLE VI AND THE AMERICANS WITH DISABILITIES ACT (ADA) DELEGATION OF AUTHORITY

SUMMARY: Through this notice, the Director delegates compliance authority for ADOT's Title VI Nondiscrimination and External ADA Programs to the Title VI/ADA Nondiscrimination Program Coordinators. The Title VI/ADA Nondiscrimination Program Coordinators report to the ECR Manager who reports to the Employee and Business Development (EBD) Administrator.

DATE: Effective upon signature

FOR FURTHER INFORMATION CONTACT:

ADOT External Civil Rights
MD 154A, 1801 W. Jefferson St, STE 101
Phoenix, AZ 85007
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Email: civilrightsoffice@azdot.gov

Section A. Authority Delegated

1. The ECR Manager is hereby delegated authority and assigned responsibility for directing and managing all aspects of the Title VI and external ADA nondiscrimination programs including providing direction and oversight for external civil rights administrative services, setting departmental administrative policy, and effectively managing program staff.
2. In addition to what is described above, the ECR Manager is hereby delegated authority to carry out the following responsibilities:
 - a. Provide guidance to leadership and management regarding all Title VI and external ADA responsibilities. This includes identifying facility-related priorities, developing plans, and providing directives for improving nondiscrimination conditions for ADOT customers and stakeholders.
 - b. Provide guidance to ADOT departments and field office staff regarding specific program area Title VI and external ADA program responsibilities. This also includes an outline of the responsibilities of the liaisons or employees designated as identified by ADOT leadership. Liaisons are utilized for the delivery and oversight of Title VI and external ADA Program duties.
 - c. The ECR Manager has authority to review policies and/or programs developed, administered and/or managed by ADOT to detect possible conflicts with the Title VI and external ADA federal requirements. The ECR Manager will perform any such additional duties as may be assigned to by the EBD Administrator by applicable law(s) or regulation(s).

Section B. Authority to Re-delegate

1. The ECR Manager may re-delegate any of the authority delegated under Section A

1. The ECR Manager may re-delegate any of the authority delegated under Section A (above).

Section C. Authority Excepted

1. The authority delegated in this document does not include the authority to sue or be sued or issue a waiver of federal law or regulations.

Section D. Statutory/Regulation Authorities

During the performance of duties, the Title VI/ADA Nondiscrimination Program Coordinator complies with the following nondiscrimination statutes and authorities, including but not limited to: Finally by the end of this course, you should be able to explain ADOT's External Discrimination Complaint Procedures

1. Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252) and 49 CFR § 21;
2. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. § 4601);
3. Federal Aid Highway Act of 1973 (23 U.S.C. § 324 et seq.);
4. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 et seq.) and 49 CFR § 27;
5. The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 et seq.);
6. Airport and Airway Improvement Act of 1982 (49 U.S.C. § 471, Section 47123), as amended;
7. The Civil Rights Restoration Act of 1987 (PL 100-209);
8. Title II and III of the ADA (42 U.S.C. §§ 12131-12189); 49 C.F.R. § 37 and § 38;
9. The Federal Aviation Administration's Nondiscrimination Statute (49 U.S.C. § 47123);
10. FMCSA Title VI/Nondiscrimination Regulation 49 C.F.R. § 303;
11. Title IX of the Education Amendments of 1972 (20 U.S.C. 1987 et seq.).



Jennifer Toth
ADOT Director

10/01/2025

Date

2. ORGANIZATION AND STAFFING

A. Staffing

ADOT Director

The Director is responsible for supervising and administering the overall activities of the department, its divisions and employees. As such, the Director signs all necessary nondiscrimination assurances to aid in ensuring all civil rights requirements are met. Duties or powers are delegated to carry out the efficient operation of the department.

EBD Administrator

The EBD Administrator reports to the ADOT Director through the ADOT Deputy Director. The Administrator's program oversight includes the following: Title VI Nondiscrimination, and the External ADA/Section 504 Programs. To comply with Code of Federal Regulations 49 part 21 and other regulatory statutes, the day-to-day Title VI roles and responsibilities are delegated to the ECR Manager.

ECR Manager

The ECR Manager reports to the EBD Administrator. The ECR Manager oversees program oversight of the Title VI/Nondiscrimination and the External ADA/504 Programs. To comply with Code of Federal Regulations 49 part 21 and other regulatory statutes, the day-to-day Title VI roles and responsibilities are delegated to the Title VI/ADA Nondiscrimination Program Coordinators.

Title VI/ADA Nondiscrimination Program Coordinators

The Title VI/ADA Nondiscrimination Program Coordinators report to the ECR Manager. The Title VI/ADA Nondiscrimination Program Coordinator's oversight includes both the day-to-day implementation of the Title VI Program as well as the External ADA/504 Program. The Title VI/ADA Nondiscrimination Program Coordinator is the department expert whose responsibilities include:

- Providing guidance and technical assistance for Title VI matters with overall program responsibility for preparing required reports regarding Title VI compliance and initiating activities including developing procedures, monitoring and:
 - Promptly resolving deficiencies and documenting remedial action within a reasonable period of time not to exceed 90 days.
 - Collecting statistical data (race, color and national origin) of participants in and beneficiaries of ADOT programs.
 - Identifying and eliminating discrimination when found to exist.
- Ensuring the Title VI Assurances are signed by the current ADOT Director.
- Complying with ADOT's procedures for processing Title VI complaints filed with ADOT against its subrecipients; reviewing and addressing complaints filed against ADOT under non-FHWA funded programs.

- Forwarding all FHWA-related discrimination Title VI complaints filed with ADOT against ADOT or its subrecipients to the FHWA Arizona Division Office.
- Conducting Title VI reviews of ADOT divisions and program areas.
- Regularly reviewing ADOT program directives in coordination with State Program officials, and where applicable, including Title VI and related requirements.
- Conducting and coordinating Title VI training for ADOT staff.
- Preparing and submitting the agency's annual Title VI Plan and Title VI Accomplishment Report to FHWA.
- Developing Title VI information for distribution to the general public in other languages, as needed.
- Monitoring public participation and awareness of Title VI policies and procedures to ensure their effectiveness in reaching the public.
- Developing and overseeing implementation of ADOT's Language Access Plan (LAP).
- Monitoring the review of National Environmental Policy Act (NEPA) documents to ensure compliance with Title VI regulation.

Title VI Program Manager

The Title VI Program Manager reports to the Title VI/ADA Nondiscrimination Program Coordinator and assists in carrying out compliance efforts regarding all aspects of the Title VI Program. In particular, the Title VI Program Manager has the delegated responsibility of ADOT's Title VI program and oversees the Civil Rights Specialists to ensure the day-to-day compliance with ADOT's Title VI Plan. The Title VI Program Manager's duties include, but will not be limited to:

- Providing guidance on Title VI matters for subrecipients and overall program responsibility for preparing required reports regarding Title VI compliance and initiating monitoring activities including developing procedures, monitoring and:
 - Promptly resolving deficiencies and documenting remedial action within 90 days.
 - Ensuring subrecipients develop procedures for the collection of statistical data (race, color and national origin) of participants in and beneficiaries of federal aid programs.
 - Implementing and overseeing subrecipient Title VI plans and programs to ensure compliance.
 - Identifying and eliminating discrimination when found to exist.
- Ensuring Title VI Assurances are signed by all subrecipients.
- Complying with ADOT's procedures to review and address non-FHWA funded program Title VI complaints filed with ADOT against its subrecipients.
- Assisting with updating FHWA Title VI plans.
- Assisting in conducting Title VI reviews of ADOT divisions and program areas.
- Assisting in conducting subrecipient annual reviews based on a high risk/low risk assessment.
- Complying with federal standards to ensure proper implementation of subrecipients' language access plans.
- Providing subrecipients Title VI training, technical assistance, resources and best practices for aiding subrecipient compliance.

- Complying and overseeing Title VI activities under ADOT's FHWA NEPA Category Exclusions Assignment (23 U.S.C. 326) and (23 U.S.C. 327) Assignment which includes all Environmental Impact Statements (EIS), Environmental Assessments (EA) and Categorical Exclusions (CE).
- Providing Title VI and ADA compliance oversight for all project-related Public Involvement activities and materials.
- Participating in project meetings as a member of ADOT project teams.
- Attending ADOT public meetings or hearings at random to ensure compliance with Title VI.
- Collecting demographic information and conducting Title VI analysis on all ADOT projects, activities, engagement and services provided.

Civil Rights Specialists

The Civil Rights Specialists are responsible for the day-to-day implementation of ADOT's Title VI Plan and for ensuring compliance with the provisions of Title VI and other nondiscrimination authorities. The Civil Rights Specialists' duties include, but will not be limited to the following:

- Assisting in and preparing the annual Title VI Accomplishment report.
- Assisting in and preparing the Title VI plan.
- Coordinating activities related to the effective and efficient implementation of ADOT's Title VI program.
- Assisting in the development of procedures and processes for preventing discrimination and addressing and resolving complaints of discrimination promptly under non-FHWA funded programs.
- Providing Title VI technical assistance, guidance, and training to ADOT staff, subrecipients, state officials, cities, counties, consultants, contractors, suppliers, universities, colleges, planning agencies, and other recipients of federal aid highway funds.
- Developing procedures for collecting statistical data on race, color, and national origin for participants and beneficiaries of the state highway program.
- Developing and publishing Title VI information for dissemination to the general public and where appropriate ensure that the information is available in languages other than English.
- Conducting Title VI annual reviews of all appropriate internal program areas, subrecipients, consultants, contractors, and other recipients of ADOT funds.
- Developing and overseeing processes for obtaining public input, particularly in traditionally underserved areas.
- Participating in the identification of Title VI impacts and mitigation measures of proposed projects.
- Attending randomly selected ADOT public meetings or hearings.
- Assisting in the review of NEPA documents to identify and address social, economic and environmental effects and impacts.
- Reviewing Title VI Plans for ADOT FHWA subrecipients to include Metropolitan Planning Organizations (MPO's), Councils of Governments (COG's) and Certification Acceptance Agencies (CAs).
- Reviewing contractual procedures for consultants and contractors to ensure

- required Title VI contract provisions are included.
- Providing technical assistance as related to Title VI to ADOT multidisciplinary project teams.

Title VI Liaison Program and Roles

To ensure compliance with Title VI throughout ADOT, the Title VI program has established a Title VI Liaison program. The program's purpose is to ensure all ADOT policies, directives, and practices are compliant with federal statutes, agency guidelines and FHWA Title VI regulation. ADOT Title VI liaisons have been established within the following program areas:

- Communications and Public Involvement
 - Community Relations and Major Projects
- Multimodal Planning Division (MPD)
 - Planning; Programming; Research; Corridor Planning; GIS; Traffic Safety and Network Screening; Data Analytics; Modeling and Forecasting; Airport Development; Contracts and Compliance
- Procurement Services
 - Procurement and Engineering and Consultant Section (ECS)
- Project Delivery and Operations
 - Contracts and Specifications (C&S); Operations Group (Statewide Maintenance Support and Construction Group; Environmental Planning (EP); Right of Way Group (ROW); Local Public Agency (LPA) and Project Management Group
- Alternative Delivery/ Major Projects (ADMP)
 - Public Private Partnership (P3) Initiatives
- Employee and Business Development
 - Business Engagement and Compliance (BECO)
- Business Enterprise
 - State Transportation Board

The Liaison program consists of one or more Liaisons from each program area. The Liaisons' role is to work with the Title VI Program Manager and Civil Rights Specialists to ensure their respective areas, programs, and subrecipients comply with Title VI processes as stated within this Title VI Plan. The Liaison also serves as the point of contact between the Title VI program and ADOT program areas when Title VI internal reviews are initiated. The Liaisons also assist their program area with Title VI technical guidance and best practices. The Liaisons meet on a quarterly basis to receive Title VI training regarding all components of ADOT's Nondiscrimination Program.

Title VI Quarterly Report

Every quarter, Title VI Liaisons submit a Title VI report on behalf of their program area. The quarterly data submitted assists the Title VI program in ensuring Title VI nondiscrimination throughout ADOT. Furthermore, the data is utilized to develop ADOT's Annual Goals and Accomplishment Report submitted to FHWA. Some Liaisons provide supplemental documents to their Title VI quarterly report with demographic data collection specific to

the participants and beneficiaries of their programs to be analyzed by the Title VI program. Specific demographic data collected and analyzed from each program is discussed further in Section Four of this plan (Program Areas, Data Collection, Reporting, Analysis).

Additionally, the Title VI program reviews and evaluates the data reported to ensure consistent Title VI information is disseminated for each project. Demographic data collected and analyzed from quarterly reports is also a factor used in a high/low risk assessment for prioritizing and identifying program areas for a Title VI Compliance Review.

Title VI Quarterly Report Contents

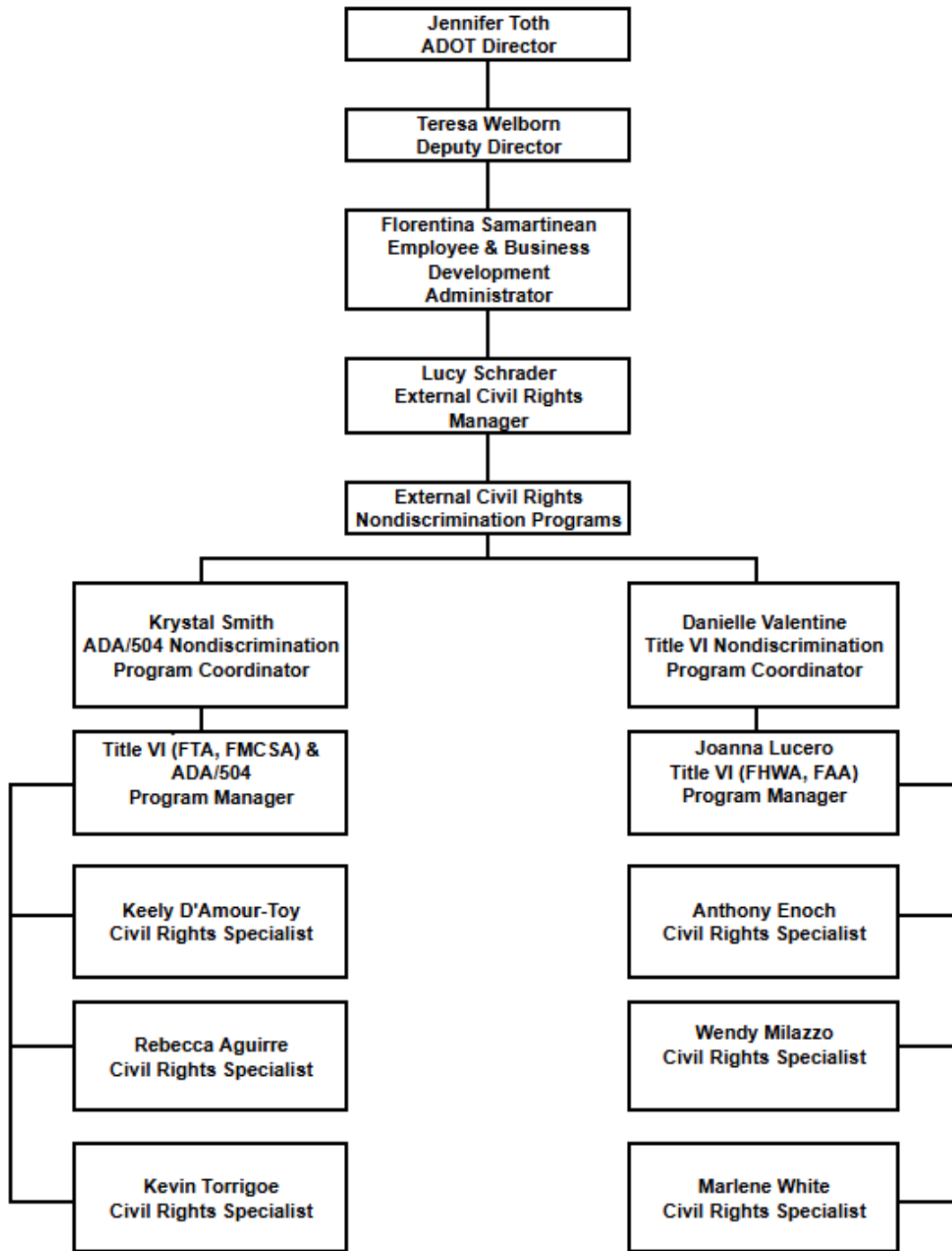
The following are the general Title VI activities reported to the Title VI program by all Title VI Liaisons to demonstrate compliance with Title VI:

- A description of any public education and public project documents disseminated to the public that ensures compliance with Title VI.
- A description of any public meetings, auctions, pre-bid, conferences, or any other ADOT hosted public events.
- The number of requests for language assistance services received and provided;
- A description of any discrimination related complaints received.
- Title VI training requests for program areas.
- A description of any project delivery documents reviewed for ADOT subrecipients;
- Title VI data collection submission.
- Organizational updates.
- Any changes to contract templates, requests for qualification templates, or solicitation templates.
- Any proposed changes made to policies, directives, public-facing manuals or guidebooks.
- Any Title VI compliance efforts or improvements made by the program area.
- Any request for technical assistance or ADOT ADA/Title VI Nondiscrimination Notice to the Public Posters.

B. ADOT Organization Chart

<https://azdot.gov/about/inside-adot/organization-chart>

C. ECR Organization Chart



3. DISSEMINATION OF TITLE VI INFORMATION

ADOT's website is designed to ensure Title VI information is readily accessible to the public. The website informs the public of their rights under Title VI and provides information on how to file a discrimination complaint. Title VI information available on ADOT's website includes:

A. Title VI Plan

ADOT's Title VI Plan is available on ADOT's website:

<https://azdot.gov/business/title-vi-program>

B. ADOT's Nondiscrimination Notice to the Public/Posters

ADOT Nondiscrimination posters and self-identification survey cards are made accessible at every public hearing and meeting. These Title VI program posters are available in English and Spanish, and other languages when needed. ADOT's Nondiscrimination Notice to the Public posters is visibly posted in areas accessible to the Public in all ADOT buildings, statewide.

ADOT's Nondiscrimination Notice to the Public is available on ADOT's website:

<https://azdot.gov/business/title-vi-program>

C. ADOT's Public Involvement Plan

The ADOT Public Involvement Plan (PIP) serves as a central resource for ADOT's public involvement practices and procedures to support transportation project planning, programming and delivery, as well as operations and maintenance activities. The PIP outlines the Department's public involvement guidelines to ensure compliance with federal and state laws and regulations. The PIP also demonstrates how ADOT engages all people in the transportation decision-making process. The PIP is intended for use by ADOT staff, ADOT consultants, and any other entities conducting public involvement on behalf of ADOT. ADOT's PIP continues to evolve in alignment with innovative and effective best practices and/or new statutes governing public involvement, and is evaluated by ADOT Communications for compliance with federal requirements and best practices.

ADOT's current PIP is available on ADOT's website:

<https://azdot.gov/planning/transportation-planning/public-involvement-plan>

D. Title VI/ADA Discrimination Complaint Form and Procedures (English and Spanish)

ADOT's Title VI/ADA Discrimination Complaint Form and Procedures are available on ADOT's website: <https://azdot.gov/business/title-vi-program>

E. ADOT's Language Access Plan (LAP)

As a strategy to provide quality customer service, encourage public participation and to allow access to ADOT's programs, a LAP sets forth standards to identify language needs for all community members in the state. The plan provides ADOT staff with resources available to assist persons to have meaningful access to all of ADOT's programs, services, and activities. ADOT's LAP is designed to comply with Title VI which prohibits recipients of federal financial assistance from discrimination based on national origin.

ADOT's LAP can be found on page 40 of this plan and is available on ADOT's website: <https://azdot.gov/business/title-vi-program>.

4. PROGRAM AREAS, DATA COLLECTION, REPORTING AND ANALYSIS

As required by federal regulation ADOT collects statistical data on the race, color, national origin, and disability of participants in and of beneficiaries of its programs. The Title VI program staff works with Title VI Liaisons/program area staff to collect and analyze demographic data. Demographic data collection efforts specific to each program area are collected through the Title VI quarterly reports and the civil rights meeting summaries, the data is compiled and reported annually in ADOT's FHWA Goals and Accomplishment Report. Demographic data collected and analyzed is also used to determine future procedural updates to the Title VI Plan and assists in identifying areas for future reviews. The efforts for the collection of demographic data, reporting, and analysis by ADOT program areas are provided below.

A. Communications and Public Involvement

The cornerstone of Title VI compliance in all ADOT programs is outreach and public involvement. ADOT has a PIP that is designed to provide early, continuous and extensive outreach to all communities to ensure that project selection or impacts do not subject populations to disparate, adverse effects based on race, color or national origin. Title VI program staff periodically attends ADOT public meetings and hearings to ensure Title VI information is disseminated as appropriate and to ensure that public involvement activities are conducted in compliance with ADOT's PIP and LAP.

Various program areas within ADOT convene public meetings or events in which the public is invited to participate. The following are procedures applicable to all ADOT program areas to ensure Title VI compliance in public involvement.

All ADOT program areas that convene a public meeting or hearing must submit to the Title VI program a Civil Rights Meeting Summary within two weeks of the hosted event.

Civil Rights Meeting Summary Contents:

- | | |
|--------------------------------|------------------------|
| ● Name/Purpose of Meeting. | Meeting. |
| ● Date/Location and Summary of | ● Number of attendees. |

- Accommodations requested for Language and ADA.
- Self-identification cards returned with breakdown of race for attendees/meeting participants.
- Copies of notices used to advertise the meeting.
- Complaints received.
- Demographic data collected and sources used.
- Photo of the sign-in sheet,
- Nondiscrimination Notice Poster and self-identification cards.
- Evidence to support that the virtual voluntary Title VI self-identification cards were used.
- Evidence that ADOT's Nondiscrimination Notice to the Public was embedded into the presentation.

After receipt of a meeting summary, Title VI program staff reviews the document and follows the criteria below:

Civil Rights Meeting Summary Review:

- Analyze and compare the demographics of the project and the demographics captured in the self-ID surveys.
- Review to ensure compliance with ADOT's PIP and Title VI requirements.
- Review project flyers and other public facing collateral contain ADOT's Title VI nondiscrimination language.
- Review media outlets and networks used to ensure access to all impacted persons, including traditionally underserved populations that may be impacted.
- Review the accessibility of meeting locations and meeting times for potential barriers to participation.
- Confirm demographic data collection resources such as, U.S. Census, school districts, forms or surveys, GIS systems, etc.
- Review data reported through self-identification cards or staff racial estimation is representative of the demography of the state and/or areas affected.
- If applicable; ensure the required Title VI requirements are met for in-person and virtual public meetings.

Once the Meeting Summary is reviewed, the Title VI program may provide the program area with recommendations and/or best practices to ensure future compliance with Title VI and the ADOT PIP.

B. Planning, Research, Construction, Public Private Partnership (P3) Initiatives and State Transportation Board

Multimodal Planning Division

All highway and transit projects in the state, funded under United States Code (USC) Titles 23, Highways and 49, Transportation, must be included in a federally approved Statewide Transportation Improvement Program (STIP). Projects in the STIP must be consistent with the statewide long-range transportation plan and metropolitan transportation improvement programs (TIPs). The program must reflect expected funding and priorities for programming, including transportation enhancements. Further

information regarding the STIP can be found at:

<https://azdot.gov/planning/transportation-programming/state-transportation-improvement-program-stip>

The Department undertakes long-range planning efforts to ensure Arizona's highway system can compete in the global marketplace, keep pace with population growth, and support our quality of life. The Long Range Transportation Plan (LRTP) establishes transportation investment priorities for ADOT based on the needs of the transportation system and anticipated future revenues. These priorities are ultimately reflected in ADOT's Five-Year Transportation Facilities Construction Program (ADOT's Five-Year Program). The Board-approved LRTP is available at:

<https://azdot.gov/planning/transportation-programs/state-long-range-transportation-plan>

ADOT's Five-Year Transportation Facilities Construction Program (ADOT's Five-Year Program) serves as a blueprint for future projects and designates how much local, state and federal funding is allocated for transportation projects. The Five-Year Program covers the construction budget for highways, airports and highway-related support facilities. The program focuses on multimodal forms of transportation. Funding for the Five-Year Program is generated by the users of transportation services, such as through the gasoline and diesel fuel taxes and the Arizona vehicle license tax. ADOT's Five-Year Program, which is prepared and revised annually, is available at:

<https://azdot.gov/planning/transportation-programming/five-year-program>

As part of the Statewide Planning Process, Transportation Planners work with Title VI Program and Community Relations staff to develop public outreach plans. An extensive state-wide public involvement process is conducted for the LRTP, the STIP and the Five-Year Program to include public review, collection of comments and public hearings. All public involvement is done in compliance with Title VI requirements as stipulated in ADOT's Public Involvement Plan (PIP) and LAP. In this partnership for outreach efforts, Title VI program staff analyze proposed outreach efforts using demographic maps that include racial makeup and language needs data from the U.S. Census at tract level. Title VI program staff analyze this demographic data to evaluate outreach planned and to provide feedback to the Planning Specialists, with any potential disparities existing. This feedback is then considered by Planning Specialists in the planning of future outreach activities.

Additionally, demographic data (race) is collected through self-identification cards at public meetings by Community Relations and is reported via meeting summaries to the Title VI program within two weeks after a public meeting. Title VI program staff conducts an analysis based on race by comparing the population demographics of the impacted project area by state, county, city, town, tract, or block against participants at the public meetings. If the demographic data assessed by the Title VI program appears to have potential disparate impacts based on race, the Title VI program works with Community Relations to identify possible additional outreach efforts that may be needed to ensure continued compliance with the Title VI Plan and to avoid potential discrimination.

Public involvement during the planning and programming process is detailed in the 2023 ADOT Public Involvement Plan, available at:

<https://azdot.gov/planning/transportation-planning/public-involvement-plan>

Public and Key Stakeholder Outreach for the LRTP can be found at:

<https://azdot.gov/planning/transportation-programs/state-long-range-transportation-plan/documents-state-long-range>

Research Center

Projects administered by the Research Center focus on research that can be applied to improve ADOT processes and products. Projects are funded by the FHWA Federal Aid Division State Planning and Research, Subpart B (SPR-B) Program. Projects are managed by Research Center staff; furthermore, the Arizona Transportation Institute (AZTI) was established in the summer of 2024 through a collaborative effort between the three state universities in Arizona: University of Arizona (UA), Arizona State University (ASU), and Northern Arizona University (NAU), and ADOT. This collaboration is formalized through a Letter of Understanding among three state universities and a Grant Agreement between UA and ADOT, creating a transportation research consortium dedicated to advancing transportation research and development within the state. The institute produces useful information and recommendations that address transportation concerns for ADOT, local jurisdictions, and other states. More information about AZTI can be found at: <https://azti.arizona.edu/>

ADOT research reports are archived in both the Arizona State Library and the FHWA Library, and can be found at: <https://asla.ent.sirsi.net/>
<https://highways.dot.gov/research/resources/research-library/federal-highway-administration-research-library>

Title VI program staff reviews the scope of work for any study that may require public participation. The Research Center reports to the Title VI program any completed four factor analyses for language as conducted for a study. Four factor analyses conducted for language are reviewed by the Title VI program staff to ensure the language needs of the study area were considered. When applicable, the Research Center may utilize surveys for studies, and in these instances demographic data (race) is collected from survey respondents. ECR may conduct an analysis for potential discrimination based on race of respondents and to ensure access has been afforded to all potential research participants. Research has not conducted a study that has utilized surveys since 2018. Further program information can be found at: <https://azdot.gov/planning/research-center>

Construction

The Construction Group provides support to help districts with managing construction projects to include:

- Providing construction administrative services to supplement the workforce with temporary technicians.
- Providing construction administrative services and material testing assistance.
- Conducting independent review of workmanship materials and documentation.
- Providing training for construction and lab technicians.
- Maintaining instructional guides for construction methods and procedures.
- Providing the services of a registered landscape architect.

- Processing monthly pay estimates, quantity documentation and subcontractor approvals.

The Construction Group submits a Title VI quarterly report to the Title VI program for all construction activities. Title VI program staff overlays construction activity locations on a demographic map that identifies the race of the population in the project area. Further, Title VI program staff analyzes the data provided for potential discrimination based on race for an analysis of pedestrian access or traffic control compared to the demographics of the project area. Mitigation commitments made during environmental studies for construction are provided to the Construction Group by the EP program area. These environmental mitigation requirements are reported on a quarterly basis to the Title VI program by the Construction Group. Title VI program staff reviews mitigation commitments reported by the Construction group to ensure follow through with all commitments. Further program information can be found at: <https://azdot.gov/business/engineering-and-construction>

Public Private Partnership (P3) Initiatives

A Public Private Partnership (P3) is a type of alternative project delivery method. P3s are a form of contracting that shares risk and occupies the space between two extremes of traditional procurement and privatization. A P3 project is generally best suited for complex, atypical projects. In a P3, the private sector may provide design, construction, finance, operations and/or maintenance of a project. ADOT has broad authority under the P3 statute to use project delivery methods or agreements or combinations of methods or agreements that will serve the public interest.

The P3 Initiatives program area submits to ECR Title VI Quarterly Reports and attends Title VI Liaison Training Meetings. Further program information can be found at: <https://azdot.gov/admp/public-private-partnerships>

State Transportation Board

The Arizona State Transportation Board is responsible for establishing a complete system of state highway routes in Arizona; it is granted policy powers by the Governor and serves in an advisory capacity to the Director of ADOT. The Board awards construction contracts, monitors the status of construction projects and has the exclusive authority to issue revenue bonds for transportation financing. The public is invited and welcome to participate at board meetings and public hearings. Every meeting includes a Call to the Audience information and discussion period, giving an opportunity for members of the public to discuss items of interest with the Board.

The State Transportation Board submits post meeting summaries to ECR and includes as part of their meetings the required Nondiscrimination and ADA posters. Further program information can be found at: <https://aztransportationboard.gov/>

C. Contracts and Finance

Procurement

This group is responsible for the expenditure of the public monies, including federal

assistance monies allocated to ADOT each year in support of ADOT management and operations. These funds must be processed in accordance with the Arizona Procurement Code. Responsibility and authority is delegated to the Chief Procurement Officer and, subsequently, to the group, based upon appropriate training, expertise, knowledge and past experience with a state government unit. The Procurement group is responsible to ensure that all ADOT contracts, agreements, and solicitations contain Title VI required language in accordance with USDOT Order 1050.2A.

Demographic data (race) on contract selection and award is reported to the Title VI program on a quarterly basis. Title VI program staff reviews this data to assess nondiscrimination in the selection and award process based on the race of all proposers compared to the selectees to identify trends of potential discrimination. Annually, Title VI program staff conducts reviews of each contract template and on a quarterly basis two contracts are randomly reviewed to ensure compliance with Title VI language in accordance with USDOT Order 1050.2A. The reviews are accessed using the Procurement Portal where all contracts are housed. Further program information can be found at: <https://azdot.gov/business/procurement>

Engineering Consultants Section

ECS is responsible for prescribing and administering procedures for managing ADOT's professional services contracts which are exempt from the State Procurement Code (ARS 41-2501). It is ECS's responsibility to ensure these procedures and the administration of contracts is compliant with applicable state and federal regulations. ECS is responsible to ensure that all ADOT contracts, agreements and solicitations contain Title VI required assurance language in accordance with USDOT Order 1050.2A.

Annually, Title VI program staff conducts reviews of each contract template and on a quarterly basis two random contracts are reviewed to ensure the Title VI language in accordance with USDOT Order 1050.2A is included in the contract. ADOT contract advertisements are posted on the ECS website with a Google Translate option for alternate language formats and can be found at:

<https://azdot.gov/business/engineering-consultants/upcoming-advertisements>

Additionally, further program information regarding ECS can be found at at:

<https://azdot.gov/business/engineering-consultants>

Contracts and Specifications (C&S)

C&S is dedicated to ensuring nondiscrimination in the prequalification process for contractors and to ensure that all ADOT contracts, agreements and solicitations contain Title VI required language in accordance with USDOT Order 1050.2A. C&S is responsible for advertising and awarding ADOT construction contracts in compliance with state and federal regulations. Current ADOT advertisements and future projects are posted on the C&S website and can be found at:

<https://azdot.gov/business/contracts-and-specifications/current-advertisements>

Demographic data (race) on contract selection and awards is reported to the Title VI program on a quarterly basis. Title VI program staff reviews this data to assess

nondiscrimination in the selection and award process based on the race of all proposers compared to the selectees to identify potential trends of potential discrimination. Annually, the Title VI program conducts reviews of each contract type template and on a quarterly basis two random contracts are reviewed to ensure the Title VI language in accordance with USDOT Order 1050.2A. Further program information can be found at:

<https://azdot.gov/business/contracts-and-specifications>

D. Environmental Planning (EP)

EP oversees all environmental programs within ADOT. This group ensures that local, state, and federal environmental laws are complied with during the development, construction, and operation of ADOT projects. EP, in collaboration with other ADOT groups such as ADOT Communications, is responsible for ensuring public participation and that nondiscrimination occurs throughout the entire environmental review process from project scoping to approval of the decision document such as categorical exclusion, (CE), Finding of No Significant Impact (FONSI), or Record of Decision (ROD) are in compliance with Title VI nondiscrimination regulation.

ADOT EP understands that Title VI is not part of NEPA per ADOT's NEPA Assignment Memorandum Of Understanding (MOU). However, in an effort to reduce the risk of public claims that may be filed with FHWA; EP sends a draft copy of all CEs (23 USC 326) and the Surface Transportation Project Delivery Program (23 USC 327). With this assignment of federal environmental review responsibility, EP is responsible for complying with all applicable federal environmental laws, regulations, executive orders and policies, and is solely legally responsible for environmental decisions made on all ADOT federal-aid highway projects.

Under NEPA assignment EP sends a draft copy of all applicable unlisted CE, Environmental Assessment (EA), and Environmental Impact Study (EIS) to the Title VI program to review for compliance. Unlisted CE (also commonly known as Individual CE) for FHWA projects refers to a transportation project that does not appear on the explicit lists of CE options in FHWA regulations (23 CFR 771.117), but still meets the general criteria for a CE – meaning it has no significant environmental impacts. Further program information on how EP considers socioeconomic impacts can be found at:

<https://azdot.gov/business/environmental-planning/ce-assignment-and-nepa-assignment>

The Title VI program has compliance oversight responsibilities for Title VI in NEPA documents. EP collects and analyzes demographic data as part of the NEPA analysis in defining the affected environment of projects. ADOT's process for identifying adverse effects on communities is described on EP's web page and can be found in ADOT EP Procedures at:

<https://azdot.gov/business/environmental-planning/guidance-federal-aid-projects>

EP reports to the Title VI program a listing of all active Individual CEs, EAs, and EISs reports for review monthly, and publishes a quarterly report of Listed CEs. EP also provides a quarterly report that includes a listing of all CEs, EAs, and EISs actions for the quarter. A listed CE for FHWA projects refers to a category of transportation projects that do not individually or cumulatively have a significant environmental impact, as determined

under NEPA. FHWA has specific categories of actions, listed in its regulations (23 CFR Part 771), that are considered CEs. Projects falling into these categories do not require the preparation of a full EA or EIS.

For Title VI compliance on NEPA projects the Title VI program conducts reviews of CEs, EAs, and EISs that are provided by EP on a project-by-project basis including all public involvement activities, in accordance with ADOT's NEPA Assignment. Title VI program staff analyzes the race demographics for the project area to ensure that current demographic data is included and that the appropriate unit of measurement (e.g. census block groups) was used to effectively determine potential discriminatory impacts.

As part of the NEPA review process, EP provides the Title VI program, on a project-by-project basis, project environmental analysis, design plans, demographic data, project related public involvement collateral, PIPs, and other project materials. Title VI program staff analyzes the proposed outreach collateral for Title VI compliance with ADOT's PIP and LAP by considering language needs and ensuring the public is aware of their rights under Title VI.

EP group attends construction partnering meetings and preconstruction meetings to communicate mitigation measures to the contractor and districts. During the development of plans and as part of the environmental clearance process, EP issues an Environmental Permit Issues and Commitments (EPIC) Sheet that outlines the environmental mitigation requirements for the contractor to follow in the final engineering plans. EP also reviews project specifications to ensure environmental commitments are included into the final plans appropriately. At the completion of construction, EP ensures that the requirements are completed by the contractor through signature of the EPIC sheet by the ADOT resident engineer who oversees the contractor.

In addition to the EPIC sheet and other reviews done for mitigation during the project development phase, EP has an Environmental Commitment Coordinator that tracks non contractor commitments and the final completion of the EPIC sheets for projects. EP utilizes the WorkFront project tracking system to routinely add projects to the tracking system and track compliance with non-contractor mitigation measures and the completion of the EPIC sheet. All mitigation measures for each project, once completed are closed out on the tracking system. EP guidance can be found on the EP website: <https://azdot.gov/business/environmental-planning/quality-assurance-and-quality-control>

For complex projects involving long term mitigation requirements such as ROW, environmental remediation, or survey work, EP coordinates directly with other ADOT groups and consultants to track mitigation measures through established project team meetings and project specific tracking spreadsheets.

EP mitigation measures with ROW depend on the project. EP group takes the lead for mitigation efforts regarding ROW; communication is facilitated during monthly meetings and through the tracking/mitigation for individual land parcels.

E. Right-of-Way (ROW) Group

The ROW group manages the real estate transactions for ADOT. The Group's primary

functions include development of State Transportation Board resolutions, ROW surveys, plans and appraisals, completion of acquisitions, condemnation, demolition, property management and residential and business relocation. The ROW group operates under the Code of Federal Regulations (49 CFR Part 24) to address the requirements established by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended. Through the use of the URA the ROW group ensures that all businesses and persons displaced by highway projects, are treated in a nondiscriminatory manner and without regard to race, color, or national origin.

During ROW's interview/intake process with owners/tenants for relocations and acquisitions, ROW staff collect demographic information, on a volunteer basis. On a quarterly basis, ROW provides the initial and final compensation offers for acquisitions to the Title VI program for review and to be analyzed for trends.

Additionally, ROW staff collects attendee demographic information (race/ethnicity) by disseminating self-identification cards during parcel auctions. ROW provides a civil rights meeting summary, within two weeks of the auction, which includes demographic data collected and additional meeting information. Title VI program staff analyzes the demographic data and at times, provides ROW feedback with recommendations for improvement to avoid potential racial discrimination. Further program information can be found at: <https://azdot.gov/business/right-way-properties>

E. Statewide Maintenance Support

Statewide Maintenance Support Group, formerly known as System Management Group of the former Transportation System Management and Operations (TSMO) Division, provides statewide support to the seven Maintenance Districts and Systems Maintenance in the Project Delivery and Operations (PDO) Division. With the recent organizational restructuring, Statewide Maintenance Support Group's functions remained the same for the most part and continues to provide multiple support functions.

The group serves as the liaison with the Statewide Maintenance Contract Services Unit to the ADOT's procurement office as the contract coordinator for maintenance roadway service contracts for the maintenance districts and systems maintenance. This unit helps support and prepares contract bid documents for new and current roadway maintenance service contracts. It also participates in pre-bid meetings and post award conferences, and researches complex contract requirements to determine specifications for new and current contracts. As required by FHWA-532, statewide maintenance contract services reports annually the maintenance contract expenditures used as part of the highway finance data collected from ADOT.

The statewide maintenance support group prepares the annual needs-based maintenance budget for maintenance and operations for the Department. This effort is led by the Maintenance Management Services (MMS) Unit. The unit has oversight of the Department's maintenance management system, PeCoS, that helps support the management of the annual maintenance budget by maintaining and tracking maintenance work activities, planning, reporting, expenditures and materials inventory. The MMS unit serves as the Information Technology Group (ITG) Liaison regarding the PeCoS applications for improving data integration tools. Also as required by FHWA-532, MMS

reports all maintenance costs by activities and routes annually as part of the Department's highway finance data reporting.

The group also manages the feature inventory asset database of all roadway assets along the state transportation system and is maintained by the Feature Inventory Services (FIS) Unit. Using the Global Positioning System (GPS), the unit locates, collects, and provides condition assessment of highway features using the FIS Data Collection Program (FISDC). This data is used to support the development of the annual needs-based maintenance budget.

The group administers the statewide level of service inspections of more than 30 individual roadway features and is reported by the Level Of Service (LOS) Unit. The inspections performed allow for maintenance units to effectively manage the maintenance budget, plan necessary maintenance work and ensure the safe operations of the state highway system. This inspection data is used to support the development of the annual needs-based maintenance budget.

As part of the organizational restructuring, the Traffic Maintenance Group was integrated into the Statewide Maintenance Support Group. The Traffic Maintenance Group provides oversight of the annual roadway striping and signing maintenance for the state highway system; it fabricates and installs signs throughout the state. This group includes three regional hubs for Signing and Striping along with the Sign Factory. These sections perform many activities related to signing and striping in the northern, central and southern regions, with the goal of providing for the safe and efficient movement of traffic throughout the state of Arizona. The group provides technical support to the three regional traffic offices and provides statewide emergency sign replacement fabrication and installation for the entire state.

ECR will evaluate this newly restructured program area to identify recommendations to ensure nondiscrimination related to statewide maintenance activities.

F. Communications: Community Relations

Community Relations oversees public involvement and outreach for ADOT transportation planning and programming, studies, projects, and initiatives. Community Relations, in coordination with Major Projects and other ADOT divisions involved in project development and delivery, is responsible for updating ADOT's PIP for compliance with federal and state requirements and best practices. The Major Projects public involvement team oversees public involvement and outreach for ADOT transportation projects delivered by the Major Projects Office. The group also serves as the lead for all ADOT media campaigns, contacts and inquiries for Major Projects. The Office of Law and Policy is responsible for informing and involving Arizona's elected officials at the local, state and federal levels in ADOT's activities affecting their constituencies. The Public Information Office (PIO) serves as the lead for all ADOT media campaigns, contacts and inquiries.

The Title VI program reviews information reported by Community Relations through PIPs to assess nondiscrimination in the public participation process, and ensure compliance with ADOT's PIP and LAP.

Community Relations submits quarterly reports to the Title VI program of all public involvement activities conducted. Title VI program staff analyzes Community Relations quarterly reports by reviewing demographic data (race) and outreach efforts to compare meeting attendees with the population's demographics of the surrounding area for each activity.

Community Relations staff collect demographic information (race and ethnicity) from attendees at public meetings using self-identification survey cards and report this demographic data to the Title VI program within two weeks after public meeting events. Title VI program staff analyzes the demographic data within the study area and the outreach activity; based on the results of the data analyzed ECR may provide Community Relations recommendations for improvement if/when applicable to avoid the potential for discrimination.

The Title VI program coordinates with Community Relations for Title VI program staff to periodically attend public meetings hosted by the group to review compliance with Title VI requirements at ADOT public meetings. Further program information can be found at:

<http://www.azdot.gov/projects>

<https://azdot.gov/adot-news>

<http://www.azdot.gov/media>

<https://www.azdot.gov/adot-blog>

G. Local Public Agency (LPA) Section

The purpose of the ADOT LPA Section is to provide guidance, assistance with project delivery and oversight to LPAs such as counties, towns, cities and tribal governments within the state. The ADOT LPA section assists the project sponsor and project managers with delivery of federally funded local government projects, and provides oversight and monitoring of federally funded local projects. The ADOT LPA section links local government project planning with project development.

The LPA section provides a LPA Projects Manual, which serves as a comprehensive monitoring and reporting document and identifies Title VI eligibility requirements, work activities, budget, schedule, and resources for the ADOT LPA section's Oversight and Monitoring Operational Plan. The LPA section also works with ADOT's Certification Acceptance (CA) agencies to ensure compliance requirements set forth by FHWA when implementing the Federal Aid Highway Program (FAHP) in Arizona.

Title VI oversight of LPAs is conducted by ADOT's Title VI program. The LPA Section submits Title VI quarterly reports to the Title VI program which documents the program area's Title VI activities. The LPA section also notifies the Title VI program of any newly certified agencies receiving FHWA funds and/or whose projects will be constructed by ADOT; this ensures the LPA meets the required Title VI program requirements. All LPA compliance reviews conducted by the Title VI program are reported to the LPA section (see Section 6 Subrecipient Review Procedures). Further program information can be found at: <https://azdot.gov/business/programs-and-partnerships/local-public-agency>

H. Business Engagement and Compliance (BECO)

The BECO office is responsible for ensuring that ADOT, its subrecipients, contractors and consultants achieve full compliance with all applicable federal regulations related to disadvantaged and small business inclusion, full and fair contracting opportunity in federal aid construction contracting and on-the-job training for women and minorities in the construction trades by certifying eligible Disadvantaged Business Enterprise (DBE) firms, maintaining a registry for Small Business Concerns (SBCs), and facilitating ADOT's good faith efforts to meet overall DBE participation goals in federal aid projects.

On a quarterly basis; BECO submits to the Title VI program any public involvement collateral material such as notices for On-the-Job Training (OJT), other supportive services offered to DBEs and notifications for DBE Disparity Studies, when conducted. Title VI program staff reviews the material for compliance with ADOT's PIP and LAP.

Additionally, BECO staff report to the Title VI program, demographic information (race) collected from attendees at public meetings, training and DBE conferences. This demographic data is analyzed by Title VI program staff to identify potential Title VI disparities in BECO's approach in providing services to members of the public and DBEs. It also serves as a way to ensure nondiscrimination, that all participants benefit from BECO services; and that BECO's outreach efforts are effectively engaging all businesses regardless of race, color, or national origin.

BECO displays the ADOT Nondiscrimination Notice to the Public at public meetings, training, conferences and incorporates nondiscrimination language in all public material. Further program information can be found at:

<https://azdot.gov/business/business-engagement-and-compliance/about-beco>

I. Project Management Group (PMG)

The Project Management Group (PMG) develops safe and efficient transportation systems that meet the needs of customers through the planning, programming, scoping and designing of the Regional Transportation Plans and the state highway system. The PMG provides quality project management services and management support information for the timely and cost-effective implementation of the ADOT Construction Program and Local Governments' Federal Aid Transportation Programs.

The PMG submits Title VI quarterly reports to the Title VI program that document the program area's Title VI activities. Further program information can be found at:

<https://azdot.gov/business/project-management-services/project-management-group>

5. TITLE VI INTERNAL PROGRAM AREA COMPLIANCE REVIEW PROCEDURES

ADOT's Title VI internal monitoring program is designed to ensure Title VI program compliance throughout ADOT. Annually, every ADOT program area in the Title VI Liaison program undergoes a high/low risk based assessment to determine the program area to be reviewed for the year.

ADOT must ensure all of its programs and activities are operated in a nondiscriminatory

manner. In order to monitor ADOT's compliance, the Title VI program reviews and analyzes Title VI quarterly reports and civil rights meeting summaries submitted by program areas; the meeting summaries describe Title VI demographic data collection efforts and sources for demographic data collected by race, color, and national origin. Further, each of the program areas submit quarterly reports which may include additional demographic data collected, disseminated project information, policy updates, organizational updates, and/or complaints received/reported. ECR's review of a meeting summary includes an individualized analysis of the four factor for language per project, data collection, outreach methods, compliance efforts with ADOT's PIP and Title VI information dissemination.

Per FHWA guidance, ADOT's assessment of a program area for Title VI compliance involves five core elements: civil rights organization and staffing; program plans and documents; program implementation (including policies and procedures); demographic data collection and analysis; and Title VI program personnel interviews.

To determine if these five core elements are adequately addressed, ADOT's Title VI program reviews for the following activities: public involvement; implementation of the agency LAP; data collection and analysis; Title VI training; and Title VI discrimination complaint processing. Additionally, ECR conducts interviews with program area staff to assess overall understanding of Title VI requirements.

ECR conducts Title VI internal program area compliance reviews on an annual basis using a high/low risk assessment. Program area reviews are conducted to:

- Ensure compliance with Title VI federal requirements.
- Provide technical assistance and training in the program areas implementation of Title VI.
- Correct deficiencies, when found to exist.

High/Low Risk assessment for internal program review is based on the following:

- Deficiencies in providing Title VI quarterly reports.
- Deficiencies in providing civil rights meeting summaries.
- Demographic data collection and analysis procedures.
- Quarterly meeting attendance by the Liaison.
- Date of last program area training.
- Complaints received.
- Date of last program area review.
- Potential risk to the agency.

The comprehensive Title VI compliance review follows the steps outlined below:

Notification process:

1. Program areas are electronically notified of the intended review by the Title VI program 35 calendar days prior to the review. Along with notification of the review, a fillable ADOT Title VI compliance review questionnaire is included for completion and submission to ECR prior to the review. The program area's Title VI Liaison

assists in coordinating and is part of the review process.

2. Two weeks prior to the review, a reminder is provided via email to discuss agenda, logistics, expectations of the review, request policies, procedures, sample documents and the Title VI compliance review questionnaire for a pre review-desk audit.

Once determined that the program area is identified for a comprehensive Title VI compliance review, electronic notice is provided to the program area's director, ECR Manager, Title VI/ADA Program Coordinator, Title VI Program Manager and the Title VI Liaison. The notice outlines:

- Date for the Title VI compliance review, 35 calendar days following the date of the notice.
- Date for all internal policies, procedures and Title VI questionnaire to be submitted to the Title VI program, no less than 30 calendar days from the date of the notice.
- Review process.

Contents of Title VI questionnaire submitted to Title VI program:

- Demographic data collection methods.
- Sampling contracts to ensure required nondiscrimination provisions are included.
- Sampling of public involvement material including meeting notices, project flyers, and other public documents demonstrating LAP requirements.
- LAP efforts.
- Directive/Policy updates.
- Training efforts.
- Title VI complaints if any received directly by the program area.

If deficiencies are found:

1. Within 30 calendar days of the review, deficiencies are documented in a tailored report for the program area that is provided to the program area director, ECR Manager, Title VI/ADA Program Coordinator, Title VI Program Manager, and the Title VI Liaison.
2. Within 30 calendar days of the Title VI program finding report, a meeting is scheduled with the Title VI program to discuss possible technical assistance and an action plan towards full compliance.
3. Outstanding high priority vital items, such as missing Title VI assurances in contracts, noncompliance with ADOT's PIP, will be submitted within 30 calendar days of report mailing.
4. The program areas submit a formal action plan within 45 calendar days of Title VI program's findings report.
5. If the program area's staff completion rate for Title VI training is under 80%; the program area will be provided training by the Title VI program prior to closing the review.
6. The program area shall correct all deficiencies within a reasonable period of time, not to exceed 90 calendar days of receipt of the Title VI Program findings report.
7. If not compliant, the Title VI program elevates the deficiency finding to the ADOT Director.

If no deficiencies are found:

1. A formal notification of full compliance is provided within 30 calendar days of review along with a report of findings.
2. The report may provide recommendations for strengthening the program area's Title VI program.
3. If the program area's staff completion rate for Title VI training is under 80%; the program area will be provided training by the Title VI program prior to closing the review.

Follow-up monitoring

The Title VI program determines if additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

6. COMPLIANCE AND ENFORCEMENT PROCEDURES

ADOT subrecipients of FHWA funding include Metropolitan Planning Organizations (MPO), Councils of Governments (COG), Certification Acceptance Agencies (CA), Self-Administered (SA) and Non-CA/Non-SA Local Public Agencies (LPAs):

MPOs:

- Central Yavapai MPO – CYMPO
- MetroPlan Greater Flagstaff (formerly Flagstaff MPO or FMPO) – MetroPlan
- Lake Havasu MPO – LHMPO
- Maricopa Association of Governments (Phoenix metro area) – MAG
- Pima Association of Governments (Tucson metro area) – PAG
- Sierra Vista MPO – SVMPO
- Sun Corridor MPO – SCMPO
- Yuma MPO – YMPO
- Bullhead City MPO - BHCMPO

COGs:

- Central Arizona Association of Governments – CAG
- Northern Arizona COG – NACOG
- Southeastern Arizona Governments Organization – SEAGO
- Western Arizona COG – WACOG

CAs:

- City of Chandler
- City of Mesa
- City of Phoenix
- City of Tempe
- City of Tucson
- City of Yuma
- Maricopa County Department of Transportation (MCDOT)
- Pima County Department of Transportation (PCDOT)

*The City of Scottsdale was decertified as a Certification Acceptance (CA) Agency; however, the City has open federal projects. The ECR will continue to maintain Title VI compliance oversight over the City for any open FHWA funded project and activities for the duration of the projects.

Title VI Requirements for MPOs, COGs, and CA Agencies of Federal-Aid Funds

On an annual basis, MPO, COG, and CA subrecipients submit Title VI plans to the ECR for review. Title VI plans are evaluated for compliance by reviewing submitted processes to implement policies and procedures prohibiting discrimination, including, but not limited to the following:

1. Title VI Nondiscrimination Statement of Policy, including:
 - a. Express commitment to the Title VI nondiscrimination program.
 - b. Specific programs and activities covered by Title VI.
 - c. Delegation of authority and responsibilities to appropriate Title VI personnel.
 - d. Appoint the Agency Title VI Program Coordinator.
 - e. Policy signed by the Chief Administrative Officer.
 - f. Process by which the policy statement is circulated throughout the organization and made available to the public.
 - g. List of all relevant federal statutes, regulations, executive orders, and other legislation.
2. Subrecipient Title VI organization and staffing information, including:
 - a. Identification of the Title VI Coordinator and program area.
 - b. Description of the Civil Rights Title VI Coordinator showing relation to the top executive, as shown on an organizational chart.
 - c. Outline the roles and responsibilities of the Title VI Coordinator and others assisting with Title VI obligations.
3. Federal Aid program areas, including:
 - a. Description of program areas.
 - b. Legal/operational authorities.
 - c. Title VI compliance monitoring responsibilities for each area.
4. Title VI Standard Assurances and Appendices (USDOT Order 1050.2).
5. Data collection procedures:
 - a. Describe how the organization collects demographic data.
 - b. Describe what demographic data is collected.
 - c. Describe how the demographic data is analyzed.
 - d. Describe how often demographic data is collected.
 - e. Describe how the demographic data is related to the different program areas: For example: in the case of a subrecipient's public outreach department, what demographic data is collected from public meeting participants; how it is used to proactively evaluate public outreach opportunities under Title VI.
6. Complaint procedures, including:
 - a. Process for filing complaints and complaint form.
 - b. Description of investigative process.
 - c. Responsible agency staff.
 - d. Time limits to submit complaints and forward to ADOT.

- e. Provide investigative reports to the ADOT Title VI program within 60 days of receipt of a non-FHWA Title VI complaint.
- 7. Annual Goals and Accomplishment reports:
 - a. Number of program area reviews conducted, results of the review, actions taken and actions planned.
 - b. Number and type of compliance reviews conducted for subcontractors and consultants.
 - c. Title VI related training provided for agency staff and subcontractors and consultants.
 - d. Summary of Title VI complaints filed with the agency.
 - e. Number of compliance reviews planned for the upcoming year.
 - f. Outcome of analyzed data for each department reviewed throughout the year.
 - g. LAP efforts.
 - h. Description of the method that the agency will follow in order to assess language needs for the agency's boundaries.
 - i. Indicate how the agency informs the public that language access services are available.
- 8. Training Procedures:
 - a. Describe how and when members of the agency are trained on Title VI program requirements and responsibilities.
 - b. Include procedures as to how and when training will be conducted for other stakeholders.

Title VI Requirements for SA LPAs:

As recipients of federal financial assistance, to be eligible for and demonstrate evidence of compliance to receive federal funds from ADOT; SA LPAs must provide the Title VI program the methods of administration which prohibit discrimination, including, but not limited to the following:

- 1. A risk-based process on programs and activities covered by Title VI.
- 2. A responsible point of contact to coordinate ADA and Title VI efforts.
- 3. A process to collect demographic data on their programs and activities.
- 4. Procedures to route ADA and Title VI complaints.
- 5. A complaint form to receive FHWA ADA and Title VI complaints.
- 6. An ADA policy.
- 7. Signed Title VI Standard Assurances and Appendices (DOT 1050.2).
- 8. ADA/Title VI Activity Logs are maintained by the SA Agency:
 - a. Employee ADA/Title VI Training Log.
 - b. Discrimination Complaint Log.
 - c. Interpretation and Translation Services and Reasonable Accommodations Log.
- 9. ADOT's ADA/Title VI Notice to the Public.
 - a. Provide a list of locations where it is posted.

7. SUBRECIPIENT ON-SITE COMPLIANCE REVIEW PROCEDURES

A. Subrecipient On-Site Compliance Review Procedures - MPOs, COGs, CAs

ADOT is a recipient of federal financial assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI. ADOT and its subrecipients of federal-aid funds must ensure that all of its programs and activities are operated in a nondiscriminatory manner.

ADOT ECR requires subrecipients to provide an updated Title VI Implementation Plan and Goals and Accomplishments Report, on an annual basis, in order to document their Title VI compliance efforts and progress. The annual report should list all of the accomplishments the subrecipient has achieved in the area of Title VI, such as program area reviews, training, and processing of Title VI complaints, as well as the goals to accomplish in the upcoming year in relation to their Title VI program. Yearly reports are analyzed and categorized based on a high/low risk assessment. After completing a high/low risk assessment, ECR conducts on-site compliance reviews of selected CAs, MPOs and COGs, and other subrecipients of federal financial assistance, to determine the level of compliance with Title VI requirements. ADOT's annual goal is to conduct subrecipient on-site compliance reviews of at a minimum 20% of its subrecipients.

The subrecipient on-site compliance review includes:

- Ensuring compliance with Title VI.
- Providing technical assistance in the implementation of the Title VI program.
- Correcting deficiencies, if found to exist.

High/Low Risk Assessment for MPOs/COGs/CAs compliance review is based on the following:

- Deficiencies identified within an initial Title VI Implementation Plan submittal.
- Deficiencies identified in the goals and accomplishments report.
- Date of last on-site review conducted.
- Demographic data collection and analysis.
- Complaints received.

Notification process:

1. Subrecipients are notified by the ECR within 35 calendar days of the upcoming Title VI on-site compliance review via electronic notification.
2. Prior to the on-site visit, the subrecipient provides policies, procedures and sample documents for a desk audit.

Once identified for a comprehensive Title VI on-site compliance review, electronic notification is provided to the agency's Director, Title VI Coordinator, ECR Manager, Title VI Program Manager and ADOT's LPA Group (for a CA agency) or MPD the MPO/COG oversight group. The notification provides the following information:

- Date for the Title VI on-site compliance review visit, 35 calendar days following the date of the notice.
- Date for all internal policies, procedures and Title VI on-site questionnaire to be submitted to ECR, no less than 30 calendar days from the date of the notice.
- Title VI on-site compliance review process.

Contents of Title VI on-site questionnaire submitted to ECR include:

- Data collection methods.
- Sampling contracts to ensure required nondiscrimination provisions are included.
- Sampling of public involvement material including meeting notices, project flyers, and other public documents demonstrating language access efforts.
- Policy updates/ changes.
- Title VI complaints if any were received by the agency.
- List of FHWA projects to include project name(s), ADOT TRAC number(s), budget amount, and active or closed status.
- Leadership changes.

Prior to an on-site review the below items are reviewed by the ECR:

- Annual goals and accomplishments report.
- Title VI Implementation Plan.
- Title VI on-site compliance review questionnaire.
- Agency website for Title VI documents and public involvement project information.

On-site review

1. The ECR reviews training efforts and the number of complaints reported, if any, in the subrecipient's required annual goals and accomplishment report or through the Title VI on-site questionnaire submitted.
2. At the on-site review visit, ECR staff conducts staff interviews and discusses reporting and data collection/analysis practices, review two FHWA funded contracts to ensure the required Title VI Assurances are included, view and document location of the subrecipient nondiscrimination notice to the public, review public notification practices, examine public participation practices, discuss language access efforts, examine efficiency of Title VI complaint procedures and make verbal and written recommendations toward best practices.

If deficiencies are found:

1. Within 30 calendar days of the on-site review visit, deficiencies are documented in a report provided to the agency's director, ADOT's LPA Section or MPO/COG program, Title VI Program Manager, Title VI Program Coordinator and ECR Manager.
2. Within 30 calendar days of the report's issuance, a meeting must be scheduled to discuss possible technical assistance and an action plan towards full compliance.
3. Outstanding high priority vital items, such as signed Title VI assurances, will be

submitted within 30 calendar days of the report's issuance.

4. Subrecipient is asked to submit a formal action plan within 45 days of the report's issuance.
5. The subrecipient should correct all deficiencies within a reasonable period of time, not to exceed 90 calendar days from receipt of the report.
6. If not compliant, ADOT makes a formal funding recommendation to the appropriate oversight division and/or federal authority.

If no deficiencies are found:

1. A formal notification of full compliance is provided to the agency's director, Title VI Program Coordinator, ECR Manager, Title VI Program Manager and ADOT's LPA Section or MPO/COG program within 30 calendar days of the on-site review along with a report of findings.
2. The report of findings may provide recommendations for strengthening the subrecipient's Title VI Program.

Follow-up monitoring

The subrecipient continues to be responsible for submitting annual FHWA Title VI reports to the ECR. The ECR determines if additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

B. Subrecipient Compliance Review Process - LPAs/SAs

High/Low Risk Assessment for LPAs compliance reviews

On an annual basis, ECR conducts the following high/low risk assessment to select desk review of LPAs. ADOT's goal is to conduct annual desk reviews of 20% of active LPAs. The ECR works with the LPAs Title VI designated point of contact to facilitate and report desk review findings. As of August 26, 2025, ADOT does not have an active SA project.

High/Low Risk Assessment for LPAs Desk Reviews:

- Funding amount and type.
- Complaints received.
- Length of time between reviews.

Desk reviews include the following elements:

- Demographic data collection and analysis.
- Title VI information dissemination efforts.
- Review Title VI training records.

If deficiencies are found:

1. Within 30 calendar days of the desk review, deficiencies are documented in a report provided to the agency's director, ADOT's LPA Section, ECR, Title VI Program Coordinator and the Title VI Program Manager.

2. Within 30 calendar days of the report's issuance, a meeting must be scheduled to discuss possible technical assistance and an action plan towards full compliance.
3. Outstanding high priority vital items, such as signed Title VI assurances, are submitted within 30 calendar days of report mailing.
4. The LPA is asked to submit a formal action plan within 45 calendar days of the report's issuance.
5. The LPA should correct all deficiencies within a reasonable period of time, not to exceed 90 calendar days of receipt of the report.
6. If not compliant, ADOT makes a formal funding recommendation to the appropriate oversight division and/or federal authority.

If no deficiencies are found:

1. A formal notification of full compliance is provided, within 30 calendar days from the desk review to the agency's director, ADOT's LPA Section, ECR Manager, Title VI Program Coordinator and the Title VI Program Manager.
2. The report may provide recommendations for strengthening the LPAs Title VI compliance program.

Follow- up Monitoring

The ECR determines if additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

8. TITLE VI TRAINING

The Title VI program implements the required annual Title VI nondiscrimination training program for all ADOT staff, consultants and contractors. Additionally on an annual basis, ECR provides Title VI training for subrecipients.

ADOT's training component for staff is composed of two (2) levels of training of varied intensity and content. Past training has included topics such as methods for identifying and eliminating complaints of discrimination, understanding and applying Title VI regulations and identifying elements of Title VI compliance within program areas.

- Title VI Liaison Level: This training is conducted quarterly and is intended to provide liaisons with an opportunity to discuss issues; ask questions regarding reviews conducted or to be conducted; review specific scenarios and share experiences. It is also an opportunity to provide individualized training related to Title VI/nondiscrimination requirements and how to apply the requirements to the specific federal program area. The training provided to the liaisons is intended to be a trickle-down approach for dissemination to staff in the group. Additionally, program area training is provided upon request and on a need basis and, more specifically, is tailored to the specific functions and major challenges of each program area.
- All staff/new staff: Annual Title VI training is mandatory for all ADOT employees. The available computer-based Training (CBT) includes an independent study of the elements contained in ADOT's Title VI Implementation Plan. The training also provides information related to general Title VI, ADA, requirements and LAP efforts,

complaint routing processes, and an emphasis on “knowing their role” as an ADOT employee to ensure nondiscrimination in activities and services provided to the public. Title VI training records for all ADOT employees are maintained by ADOT Learning and Development and accessible to the Title VI program.

The Title VI training program for subrecipients is composed of two levels of training of varied intensity and content.

- On an annual basis MPO, COG, and CA Title VI coordinators are provided mandatory training. Furthermore, MPOs, COGs and CAs selected for an on-site compliance review; will be provided tailored training to address the issues and/or challenges facing the agency as identified through the formal on-site review.
- LPAs receive Title VI training at the onset of becoming a subrecipient of FHWA funds from ADOT. Additional training is identified from desk reviews conducted by the Title VI program to ensure that each subrecipient is afforded an opportunity to receive Title VI training at a minimum every three years. Furthermore, training and technical assistance is provided on an ongoing basis and as requested by the subrecipient agency.

9. COMPLAINT PROCEDURES

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, as amended and the Civil Rights Restoration Act of 1987 as they relate to any program or activity administered by ADOT, its subrecipients, consultants, and/or contractors. Intimidation or retaliation as a result of a complaint is prohibited by law.

In addition to these procedures, complainants reserve the right to file formal complaints with other state or federal agencies or to seek private counsel. On Non-FHWA funded programs and activities, every effort is made to resolve complaints informally by ADOT and subrecipient level.

1. All complaints received by ADOT against ADOT or FHWA Subrecipients in FHWA-funded programs and activities are referred to the FHWA Arizona Division Office for processing.
2. Contact, information, and complaint process for FHWA Office of Civil Rights can be found here: <https://www.fhwa.dot.gov/civilrights/file/>
3. All other complaints filed against ADOT in programs not funded by FHWA will be reviewed under ADOT’s authority and jurisdiction for processing.
4. Any person, specific class of persons or entity that believes they have been subjected to discrimination as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, or disability may file a formal complaint with ECR. A copy of the Discrimination Complaint Form may be accessed electronically at: <https://azdot.gov/business/title-vi-program>
5. Complaints must be filed within 180 days of the alleged discrimination, and include the date the alleged discrimination became known to the complainant and the last date of the incident.
6. A complaint should contain the following information:
 - a. A written explanation of the alleged discriminatory actions. The allegations must involve an ADOT service, activity, or program.

- b. The complainant's contact information, including: full name, address, phone number, and email address.
 - c. The basis of the complaint (e.g., race, color, national origin, disability).
 - d. The names of specific persons or program area(s) alleged to have discriminated.
 - e. The date(s) of the alleged discriminatory act(s).
 - f. The corrective action being sought by the complainant.
- 7. Complaints may be filed by one of the following methods:
 - a. By completing and signing the complaint form and delivering it in person or by mail.
 - b. Emailing the complaint form and mailing the signed original to ECR.
 - c. By calling ECR where information is used to complete the complaint form and, forwarded to the complainant for review, and signature.
 - d. By electronically submitting and digitally signing the complaint form.
- 8. All Title VI discrimination complaints against ADOT in FHWA-funded programs and activities will be referred to the FHWA Division Office for processing.
 - a. All other discrimination complaints, if within ADOT's jurisdiction, received and filed against ADOT programs not funded by FHWA will be reviewed and processed by the ECR.
- 9. Every effort will be made to resolve complaints informally at ADOT and the subrecipient level. Complainants may file formal complaints directly with the USDOT federal agencies listed below:
 - a. USDOT, Federal Highway Administration, Arizona Division 4000 North Central Avenue, Suite 1500, Phoenix, AZ 85012.
 - b. USDOT, Federal Aviation Administration 800 Independence Ave. SW, Washington, DC 20591.
 - c. USDOT, Federal Motor Carrier Safety Administration 1200 New Jersey Ave. SE, Washington, DC 20590.
 - d. USDOT, Federal Transit Administration FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.
 - e. USDOT, National Highway Traffic Safety Administration 1200 New Jersey Ave. SE, Washington, DC 20590.

For questions or to file a complaint, please contact:

ADOT External Civil Rights
 MD 154A, 1801 W. Jefferson St, STE 101
 Phoenix, AZ 85007
 Phone: (602) 712-8946
 Email: civilrightsoffice@azdot.gov

10. LANGUAGE ACCESS PLAN (LAP)

ADOT in the course of routine business matters makes efforts to provide quality customer service and to effectively communicate with all members of the public. ADOT's LAP is designed to provide staff with resources available to assist all persons to have meaningful access to ADOT's programs, services, and activities. Furthermore, the plan is designed to comply with Title VI of the Civil Rights Act of 1964 which prohibits recipients of federal financial assistance from discrimination based on national origin.

Roles and Responsibilities

Each program area is encouraged to provide quality customer service by conducting a four factor analysis to assess language needs of the customers they serve. Four factor analysis for language completed can be sent to ECR for review before implementation. ECR conducts a secondary examination to ensure accuracy and consistency of the application of the four factor analysis. The Title VI program reviews all civil rights meeting summaries, which are required to be submitted within two weeks by the program area that convenes a public meeting; the review ensures compliance with ADOT's PIP.

Activity	ADOT Division / Program	Title VI Program
1. Assessing and addressing the needs of eligible persons (Conduct a four factor analysis for language). Recommended table to be used: C16001 "language spoken at home by ability to speak English for population 5 years and over" from the 5 year American Community Survey.	X	
2. Taking reasonable steps or ensuring that responsible steps are taken to ensure meaningful access	X	
3. Developing and implementing monitoring control mechanisms to ensure delivery of service and ongoing compliance	X	X
4. Monitoring and oversight	X	X
5. Providing technical assistance and guidance		X
6. Reporting accomplishments and goals	X	X

Factors in the four factor analysis for language

Factor 1: Identify the number and proportion of persons with language needs served or encountered and eligible for service population by the ADOT Program/Project.

Factor 2: Identify the frequency in which persons with language needs will encounter the ADOT programs services and activities.

Factor 3: Identify the nature and importance of the program, activities or services provided by ADOT to persons with language needs

Factor 4: Identify available resources, including language assistance services varying from limited to wide ranging with varying costs by the ADOT Program/Project.

ADOT Four Factor Analysis for Language

In developing its Title VI Plan, ADOT followed the most recent resources provided by the USDOT for conducting a four factor language needs analysis which considers the following:

1. The number or proportion of persons with language needs eligible in Arizona who

may be served or likely to encounter ADOT programs, activities, or services.

Based on data collected from the U.S. Census for Arizona, Spanish and Navajo are identified as the top languages for persons with language needs likely to be served by an ADOT program, service, or activity.

State of Arizona Population with Language Needs by County				
County	Language	Percent	Speak English less than "very well"	Total Population
Apache	Other and unspecified languages	11.47%	7,084	61,741
Cochise	Spanish	6.82%	8,105	118,925
Coconino	Spanish	1.48%	2,039	137,598
Coconino	Other and unspecified languages	2.86%	3,931	137,598
Gila	Spanish	1.32%	678	51,233
Gila	Other and unspecified languages	0.83%	426	51,233
Graham	Spanish	2.16%	786	36,320
Greenlee	N/A	N/A	N/A	8,743
La Paz	Spanish	6.07%	966	15,903
Maricopa	Spanish	6.16%	260,959	4,234,272
Maricopa	French, Haitian, or Cajun	0.06%	2,398	4,234,272
Maricopa	Russian, Polish, or other Slavic languages	0.12%	5,056	4,234,272
Maricopa	Other Indo-European languages	0.35%	14,647	4,234,272
Maricopa	Korean	0.07%	2,950	4,234,272
Maricopa	Chinese (incl. Mandarin, Cantonese)	0.28%	11,735	4,234,272
Maricopa	Vietnamese	0.23%	9,518	4,234,272
Maricopa	Tagalog (incl. Filipino)	0.09%	3,907	4,234,272
Maricopa	Other Asian and Pacific Island languages	0.26%	10,848	4,234,272
Maricopa	Arabic	0.16%	6,495	4,234,272
Maricopa	Other and unspecified languages	0.23%	9,716	4,234,272
Mohave	Spanish	2.30%	4,797	208,593
Navajo	Spanish	1.24%	1,253	101,161

Navajo	Other and unspecified languages	6.71%	6,789	101,161
Pima	Spanish	5.75%	57,386	997,662
Pima	Russian, Polish, or other Slavic languages	0.12%	1,171	997,662
Pima	Other Indo-European languages	0.14%	1,425	997,662
Pima	Chinese (incl. Mandarin, Cantonese)	0.27%	2,648	997,662
Pima	Vietnamese	0.11%	1,138	997,662
Pima	Other Asian and Pacific Island languages	0.17%	1,698	997,662
Pima	Arabic	0.11%	1,139	997,662
Pima	Other and unspecified languages	0.19%	1,903	997,662
Pinal	Spanish	4.63%	19,672	425,204
Santa Cruz	Spanish	35.57%	16,057	45,146
Yavapai	Spanish	2.79%	6,486	232,569
Yuma	Spanish	19.63%	38,000	193,606
Source: U.S. Census Bureau (2023). Language Spoken at Home, Language Spoken at Home for the Population 5 Years and Over, 2019-2023 American Community Survey 5-Year estimates. Retrieved August 22, 2025 from: https://data.census.gov/table/ACSDT5Y2022.C16001?q=C16001:+Language+Spoken+at+Home+for+the+Population+5+Years+and+Over&g=040XX00US04\$0500000&moe=false				

2. The frequency with which persons with language needs come in contact with ADOT programs services and activities. ADOT program areas identified to have the highest public interactions are listed below:

MOTOR VEHICLE DIVISION (MVD) AND COMPLIANCE

- Motor Vehicle Division (MVD)
 - Customer Service Program
 - Regulatory (Third Party Program)
 - Specialty Registration and Licensing Program
 - Division Operational Support Services
 - Commercial Licensing Program
- Enforcement and Compliance Division (ECD)
 - Office of Inspector General
 - Enforcement Services Bureau
- Human Resources (HR)

OFFICE OF LAW AND POLICY

- Executive Hearing Office

BUSINESS OPERATIONS

- Employee and Business Development (EBD)
 - External Civil Rights (ECR)
 - Business Engagement and Compliance Office (BECO)
- Audit and Analysis
- Communications and Public Involvement
 - Community Relations
 - Major Projects
 - Public Information

BUSINESS ENTERPRISE

- State Transportation Board
- Enterprise Safety and Business Continuity
- Arizona Highways Magazine
- Administrative Services Division (ASD)
 - Grand Canyon National Park Airport
 - Facilities Management

FINANCE

- Procurement Service Division
 - Procurement
 - Engineering Consultant Services (ECS)

STATE ENGINEER

- Project Delivery and Operations Division (PDO)
 - Engineering Consultant Section (ECS)
 - Construction Group
 - Contracts and Specifications (C&S)
 - Local Public Agency (LPA)
 - Joint Project Agreement Section
 - Right of Way (ROW)
 - Project Management Group (PMG)
 - Environmental Planning (EP)
 - Statewide Maintenance
- Multimodal Planning Division (MPD)
 - Airport Development
 - Transit Programs and Grants
 - Grant Coordination
 - Research Center
 - Transportation Analysis
 - Planning
 - Programming
- Alternative Delivery/Major Projects
 - Public Private Partnership (P3) Initiatives

3. The nature and importance of the program, activities or services provided by ADOT to persons with language needs.

All of ADOT's programs are important; however, ADOT has identified those related to safety, public transit, ROW, EP, Community Relations and public information are among the most important and likely to have the highest interactions with persons with language needs.

As such, publications and other material disseminated regarding these programs are routinely available in both English and Spanish. ADOT strives to continue to provide alternative and meaningful language formats to all persons with language needs. Moreover, ADOT evaluates its programs, services and activities to ensure that persons with language needs are always provided with meaningful access.

4. The resources available to ADOT and overall cost to provide language assistance.

ADOT makes every effort to make its programs, services and activities accessible to individuals with language needs. ADOT displays ADOT Nondiscrimination Notices in both English and Spanish in conspicuous locations within its facilities, public rest areas, and at public meetings both in-person or virtual format. Additionally, Title VI/ADA Complaint Procedures are distributed by program areas that come into contact with the public in both English and Spanish. Nondiscrimination language in both English and Spanish is also displayed on external notices/communications to the public to request assistance. ADOT continues to use available resources, both internal and external, to accommodate reasonable requests for translation and interpretation services free of cost, regardless of the language, when requested within reasonable notice.

ADOT has identified the following resources for addressing language needs:

- List containing direct contact information for volunteer ADOT staff that assist as interpreters and/or translators if needed. Lists are verified and updated annually for each program area by the Title VI Liaison and provided to Title VI Liaisons.
- Program areas having contact with the public use the U.S. Census "I Speak" language cards to identify language needs in order to match with available services. Language cards are verified and distributed annually by the program area Title VI Liaison.
- Use of web based translation and telephonic interpretation services under contract with ADOT, when required.
- Each program area maintains a list of translation and interpretation services for use, when required.
- All ADOT program areas procure interpretation and or translation services through the Arizona Procurement Portal (APP) which lists ADOT "on-contract" interpretation and or translation vendors.

ADOT makes the below Title VI information available in Spanish:

- Title VI and Nondiscrimination Notice to the Public.
- Complaint Form.
- Self-identification cards to voluntarily collect demographic data.
- Outgoing voice message for ECR's main phone line.

Conclusion

ADOT understands that language needs will change as the Arizona population changes. Further, ADOT assesses its programs and services each year to determine compliance with various nondiscrimination regulations. As such, ADOT revisits the LAP each year and makes appropriate changes, as needed. For questions or concerns regarding the ADOT's commitment to nondiscrimination or to request additional information about language services, contact Title VI/ADA Nondiscrimination Program Coordinators at:

ADOT External Civil Rights
MD 154A, 1801 W. Jefferson St, STE 101
Phoenix, AZ 85007
Phone: (602) 712-8946
Email: civilrightsoffice@azdot.gov

LAP Resources

The resources listed below are provided to assist ADOT's program areas with implementing LAP requirements and may be used in conjunction with this plan.

- <https://www.federalregister.gov/documents/2001/01/22/01-1745/dot-guidance-to-recipients-on-special-language-services-to-limited-english-proficient-lep>
- <https://www.epa.gov/sites/default/files/2015-03/documents/lepguide.pdf>
- <https://highways.dot.gov/civil-rights/programs/title-vi/title-vi-toolkit-us-census-limited-english-proficiency-data>

11. ACRONYMS

ADA	Americans with Disabilities Act
ADOT	Arizona Department of Transportation
AZ ULTRACS	Arizona Transportation Business Portal
BECO	Business Engagement and Compliance
CA	Certification Acceptance Agencies
CAG	Central Arizona Association of Governments
CE	Categorical Exclusions
CFR	Code of Federal Regulations
COG	Council of Governments
CNS	Contracts and Specifications
ECR	External Civil Rights
CYMPO	Central Yavapai Metropolitan Planning Organization
DBE	Disadvantaged Business Enterprise
EA	Environmental Assessments
ECS	Engineering Consultants Section
EIS	Environmental Impact Statements
EO	Executive Order
EP	Environmental Planning
FAA	Federal Aviation Administration
FAHP	Federal Aid Highway Program
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FMPO	Flagstaff Metropolitan Planning Organization(Metro Plan)
FMSG	Facilities Management and Support Group
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
ITG	Information Technology Group
LAP	Language Access Plan
LHMPO	Lake Havasu Metropolitan Planning Organization
LPA	Local Public Agency
MAG	Maricopa Association of Governments (Phoenix metro area)
MPD	Multimodal Planning Division
MPO	Metropolitan Planning Organization
MVD	Motor Vehicle Division
NACOG	Northern Arizona Council of Governments
NEPA	National Environmental Policy Act
NHTSA	National Highway Traffic Safety Administration
OJT	On-the-Job Training
P3	Public Private Partnership
PAG	Pima Association of Governments (Tucson metro area)
PIO	Public Information Office

PIP	Public Involvement Plan
RFQ	Request for Qualifications
ROD	Record of Decision
ROW	Right-of-Way
SA	Self-Administered LPA
SCMPO	Sun Corridor Metropolitan Planning Organization
SEAGO	Southeastern Arizona Governments Organization
STIP	State Transportation Improvement Plan
SVMPO	Sierra Vista Metropolitan Planning Organization
TIP	Transportation Improvement Plan
TITLE VI PLAN	Title VI Nondiscrimination Implementation Plan
URA	Uniform Relocation Assistance
USDOT	United States Department of Transportation
WACOG	Western Arizona Council of Governments
YMPO	Yuma Metropolitan Planning Organization

12. AUTHORITIES

Pertinent Nondiscrimination Authorities:

[Title VI of the Civil Rights Act of 1964](#)

[The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970](#)

[49 CFR Part 21](#)

[23 CFR Part 200](#)

[The Age Discrimination Act of 1975](#)

[504 of the Rehabilitation Act of 1973](#)

[Titles II Americans with Disabilities Act](#)

[Title III Americans with Disabilities Act](#)

[Federal Aviation Administration's Nondiscrimination Statute](#)

[Section 162 \(a\) of the Federal-Aid Highway Act of 1973](#)