

Arizona Department of Transportation External Civil Rights

TITLE VI Nondiscrimination Program FFY2026 Language Access Plan



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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.

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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\$05000000&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>