

ARIZONA

— DEPARTMENT OF —
TRANSPORTATION



Arizona Department of Transportation FFY2027 Language Access Plan (LAP)



ADOT LAP

ADOT 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.

A. 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. A completed four-factor analysis for language 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. ECR 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. Additionally, Program areas that provide quarterly Title VI reports should provide summaries of any translation or interpretation requests from the public.

Activity	ADOT Program Areas	Title VI Program
• 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	
• Taking reasonable steps or ensuring that responsible steps are taken to ensure meaningful access.	X	
• Developing and implementing monitoring control mechanisms to ensure delivery of service and ongoing compliance.	X	X
• Monitoring and oversight.	X	X
• Providing technical assistance and guidance.		X
• Submitting the Goals and Accomplishment Report to FHWA.	X	X

Breakdown of the Four-Factor Analysis For Language	
Factor One: Number and Proportion	Identify the number and proportion of persons with language needs served or encountered and eligible for service population by the ADOT Program/Project.

Factor Two: Frequency and Encounter	Identify the frequency with which persons with language needs will encounter the ADOT programs, services, and activities.
Factor Three: Nature and Importance	Identify the nature and importance of the programs, services, or activities provided by ADOT to persons with language needs.
Factor Four: Available Resources	Identify available resources, including language assistance services varying from limited to wide ranging with varying costs by the ADOT Program/Project.

B. ADOT's Four-Factor Analysis for Language

Factor One

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 number or proportion of persons with language needs in Arizona who are eligible and 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	10.77%	6,631	61,593
Cochise	Spanish	7.48%	8,916	119,210
Coconino	Other and unspecified languages	2.72%	3,748	137,770
Coconino	Spanish	1.61%	2,216	137,770
Gila	N/A	N/A	N/A	51,472
Graham	N/A	N/A	N/A	36,776
Greenlee	Spanish	6.40%	567	8,861
La Paz	Spanish	5.87%	942	16,044
Maricopa	Spanish	6.39%	275,059	4,303,380
Maricopa	Other Indo-European languages	0.33%	14,346	4,303,380

Maricopa	Chinese (incl. Mandarin, Cantonese)	0.31%	13,262	4,303,380
Maricopa	Other and unspecified languages	0.26%	11,290	4,303,380
Maricopa	Other Asian and Pacific Island languages	0.25%	10,952	4,303,380
Maricopa	Vietnamese	0.25%	10,563	4,303,380
Maricopa	Arabic	0.16%	6,862	4,303,380
Maricopa	Tagalog (incl. Filipino)	0.11%	4,729	4,303,380
Maricopa	Russian, Polish, or other Slavic languages	0.11%	4,687	4,303,380
Maricopa	Korean	0.09%	3,847	4,303,380
Maricopa	French, Haitian, or Cajun	0.06%	2,484	4,303,380
Maricopa	German or other West Germanic languages	0.03%	1,085	4,303,380
Mohave	Spanish	2.31%	4,889	211,606
Navajo	Other and unspecified languages	6.22%	6,341	101,960
Navajo	Spanish	1.39%	1,418	101,960
Pima	Spanish	5.75%	58,016	1,008,808
Pima	Chinese (incl. Mandarin, Cantonese)	0.26%	2,585	1,008,808
Pima	Other Indo-European languages	0.19%	1,937	1,008,808
Pima	Other and unspecified languages	0.16%	1,587	1,008,808
Pima	Russian, Polish, or other Slavic languages	0.13%	1,336	1,008,808
Pima	Other Asian and Pacific Island languages	0.13%	1,274	1,008,808
Pima	Vietnamese	0.11%	1,135	1,008,808
Pinal	Spanish	4.68%	20,774	443,958
Santa Cruz	Spanish	35.07%	16,103	45,912

Yavapai	Spanish	2.49%	5,894	236,316
Yuma	Spanish	20.34%	40,193	197,654

Source: U.S. Census Bureau. Language Spoken at Home for the Population 5 Years and Over, 2020-2024. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001. Retrieved August 20, 2026 from:
[https://data.census.gov/table/ACSDT5Y2024.C16001?q=C16001:+LANGUAGE+SPOKEN+AT+HOME+FOR+THE+POPULATION+5+YEARS+AND+OVER&g=040XX00US04\\$0500000&moe=false](https://data.census.gov/table/ACSDT5Y2024.C16001?q=C16001:+LANGUAGE+SPOKEN+AT+HOME+FOR+THE+POPULATION+5+YEARS+AND+OVER&g=040XX00US04$0500000&moe=false)

Factor Two

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

Director's Office

- State Transportation Board.

Business Services

- Motor Vehicle Division (MVD):
 - Customer Service Program.
 - Regulatory (Third Party Program).
 - Specialty Registration and Licensing Program.
 - Division Operational Support Services.
 - Commercial Licensing Program.
- Administrative Services Division (ASD):
 - Grand Canyon National Park Airport.
 - Facilities Management.
- Procurement Service Division:
 - Procurement.
 - Engineering Consultant Services (ECS).

State Engineer

- Project Delivery and Operations Division (PDO):
 - Construction Group.
 - Contracts and Specifications (C&S).
 - Local Public Agency (LPA).
 - Joint Project Agreement Section.
 - Right-of-Way (ROW) Group.
 - Project Management Group (PMG).
 - Environmental Planning (EP).
 - Statewide Maintenance.
- Multimodal Planning Division (MPD):
 - Transportation Planning.
 - Programming; Research Center.
 - Corridor Planning.

- GIS Analysis.
- Traffic Safety Group.
- Data Analytics.
- Modeling and Forecasting.
- Airport Development.
- Contracts and Compliance.
- Alternative Delivery/Major Projects:
 - Public Private Partnership (P3) Initiatives.

Enforcement and Compliance

- Enforcement and Compliance Division (ECD):
 - Office of Inspector General.
 - Enforcement Services Bureau.
- Enterprise Safety and Business Continuity.
- Audit and Analysis.
- Emergency Management
- Traffic Operations Center (TOC)

Office Of Law and Policy

- Executive Hearing Office.
- Employee and Business Development (EBD).
 - External Civil Rights (ECR).
 - Small Business and Workforce Development (SBWD).
- Internal and External Relations Division.
 - Communications and Public Involvement.
- Arizona Highways Magazine.

Factor Three

The nature and importance of the programs, services, or activities 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.

Factor Four

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 in both in-person and 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 at no cost, regardless of the language, when requested within reasonable notice. ADOT has identified the following resources for addressing language needs:

- Use of web-based translation and telephonic interpretation services under contract with ADOT, when required.
- Each program area is responsible for maintaining 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 MVD features enhanced communication accommodations, which allow people to voluntarily indicate through their driver or vehicle record that they, or someone in the vehicle, may require accommodations to better communicate with first responders during traffic stops or incidents. When law enforcement runs a driver license number, license plate or VIN for those that have signed up, the phrase ‘Communication Accommodation’ appears on the first responder’s computer screen. This helps law enforcement understand that someone may respond differently during traffic stops or other interactions.

ADOT makes the following 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.

Additionally, 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://www.transportation.gov/mission/civil-rights/civil-rights-awareness-enforcement/language-access-plan>.

Conclusion

ADOT understands that language needs will change as the Arizona population changes. Language needs will be assessed for all ADOT projects. 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 to request additional information about language services, contact ADOT ECR at:

ADOT External Civil Rights
Title VI/ADA Program Coordinator
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