

ARIZONA

— DEPARTMENT OF —
TRANSPORTATION



Federal Highway Administration FFY2027 TITLE VI NONDISCRIMINATION IMPLEMENTATION PLAN Arizona Department of Transportation

This page is intentionally left blank

The Arizona Department of Transportation (ADOT) has established this Federal Highway Administration (FHWA) Title VI Nondiscrimination Implementation Plan (Title VI Plan) to serve as the standard operating procedures for ADOT's External Civil Rights (ECR) to lead the oversight of ADOT's programs and activities and to ensure the agency is in compliance with Title VI of the Civil Rights Act of 1964, 23 Code of Federal Regulations (CFR) § 200, and other related civil rights laws and regulations. The Title VI Plan will be updated annually to reflect changes in law, regulations, policies, and administrative requirements. The Title VI Plan is intended to provide guidance to department personnel and other interested entities; it is not intended to be relied upon to create any right or benefit enforceable by law by a party against the department.

An electronic copy of the Title VI Plan can be found on ADOT's website: <https://azdot.gov/business/title-vi-program>.

ADOT is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, services, or activities on the grounds of race, color, national origin, age, sex, or disability. A translation of the Title VI plan into alternate languages, and for individuals with disabilities in alternate formats, can be made available upon request. To obtain a copy in one of these alternate formats or for questions or concerns, please contact ADOT External Civil Rights.

Para obtener una copia de este documento en formatos alternativos o si tiene preguntas por favor contacte a:

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

TABLE OF CONTENTS

ADOT OVERVIEW	5
INTRODUCTION	6
A. Policy Overview and Objectives	6
B. USDOT Standard Title VI and Nondiscrimination Assurances	7
C. Policy Statement	7
D. Delegation of Authority	8
ORGANIZATION AND STAFFING	10
A. Staffing	10
B. Title VI Liaison Program and Roles	12
C. ADOT Organization Charts	15
DISSEMINATION OF TITLE VI INFORMATION	16
PROGRAM AREAS, DATA COLLECTION, REPORTING, AND ANALYSIS	17
A. Public Outreach and Involvement	17
B. Planning, Research Center, Construction, Public Private Partnership (P3) Initiatives, and State Transportation Board	18
C. Contracts and Finance	20
D. Environmental Planning (EP)	21
E. Right-of-Way (ROW) Group	21
F. Statewide Maintenance Support	22
G. Communications and Public Involvement	22
H. Local Public Agency (LPA) Section	23
I. Small Business and Workforce Development (SBWD)	23
J. Project Management Group (PMG)	23
TITLE VI INTERNAL PROGRAM AREA COMPLIANCE REVIEW PROCEDURES	24
A. ADOT Title VI Internal Monitoring Program	24
B. Annual Title VI Internal Compliance Reviews	24
COMPLIANCE AND ENFORCEMENT PROCEDURES	27
SUBRECIPIENT ON-SITE COMPLIANCE REVIEW PROCEDURES	30
A. Subrecipient On-Site Compliance Review Procedures - MPOs, COGs, CAs	30
B. Subrecipient Compliance Review Process - SAs	32
TITLE VI TRAINING	34
COMPLAINT PROCEDURES	35
External Complaint Procedures	35
ADOT LAP	37
A. Roles and Responsibilities	37
B. ADOT's Four-Factor Analysis for Language	38
ACRONYMS	44
NONDISCRIMINATION AUTHORITIES	46

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, ADOT provides driver's license and registration services, oversees commercial vehicle enforcement and registration compliance, operates the Grand Canyon National Park Airport, and manages the state vehicle 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, the United States Department of Transportation (USDOT) also annually awards ADOT federal funds, 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 work 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 required to comply with federal nondiscrimination requirements. The Title VI Plan was developed in accordance with applicable federal laws, regulations, and guidance. Furthermore, the Title VI Plan is shared with internal ADOT department directors and external agency administrators to support implementation and to ensure continued compliance.

To request further information, please contact ADOT 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

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 U.S.C. § 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:

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

ADOT's Title VI Program objectives include:

- To be transparent with the public on ADOT's standard operating procedures to ensure nondiscrimination in all ADOT programs, services, and activities.
- To assign and clarify roles, responsibilities, and procedures necessary to ensure compliance with Title VI and all related nondiscrimination statutes.
- To ensure that all participants and beneficiaries of ADOT's programs, projects, and activities receive services, benefits, and opportunities to which they are entitled without regard to race, color, or national origin.
- To ensure all ADOT employees, including consultants and contractors performing work on behalf of ADOT are aware 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. USDOT Standard Title VI and Nondiscrimination Assurances

ADOT's Standard USDOT Title VI Assurances are in accordance with USDOT Order 1050.2A. The ADOT Director signed the FY2027 Assurances which can be found here: <https://azdot.gov/business/title-vi-program>.

ADOT is aware that Executive Order (EO) 12898 (EJ) and EO 13166 (LEP) have been rescinded; however, the Standard USDOT Title VI Assurance template 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

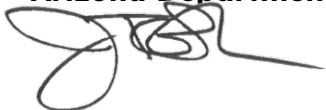
The Arizona Department of Transportation (ADOT), as policy, assures nondiscrimination compliance on the grounds of race, color, national origin, and disability as provided by Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation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

With her signature, the ADOT Director approves the FHWA Title VI Plan, provides assurance, and delegates full authority through Employee and Business Development (EBD) to ECR to oversee and implement ADOT's external ADA and Title VI Programs in compliance with USDOT ADA and Title VI regulations.

Arizona Department of Transportation



Jennifer Toth
ADOT Director

9/24/2026

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

Section A. Authority Delegated

- The ECR Manager has 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.
- In addition to what is described above, the ECR Manager has delegated authority to carry out the following responsibilities:
 - 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.
 - 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.
 - The ECR Manager has authority to review policies and/or programs developed, administered and/or managed by ADOT to detect possible conflicts with Title VI and external ADA requirements. The ECR Manager will perform any such additional duties as assigned by the EBD Administrator according to applicable law(s) or regulation(s).

Section B. Authority to Re-delegate

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

Section C. Authority Excepted

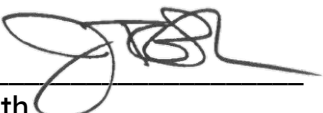
- The authority delegated in this document does not include the authority to sue or be sued or issue a waiver of federal law or regulations.

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:

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

Arizona Department of Transportation



Jennifer Toth
ADOT Director

9/24/2026

Date

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. 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 ADOT.

EBD Administrator

The EBD Administrator reports to the ADOT Director through the ADOT Deputy Director. The Administrator's program oversight includes the Title VI Nondiscrimination Program and the External ADA/Section 504 Program. To comply with 49 CFR part 21 and other applicable regulatory statutes, the strategic and programmatic oversight of Title VI are delegated to the ECR Manager.

ECR Manager

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

ECR Title VI/ADA Nondiscrimination Program Coordinators

The Title VI/ADA Nondiscrimination Program Coordinators report to the ECR Manager. Their oversight includes both the day-to-day implementation of the Title VI Nondiscrimination Program and the External ADA/Section 504 Program. The Title VI/ADA Nondiscrimination Program Coordinators are the department experts whose responsibilities include:

- Providing guidance and technical assistance on Title VI matters. Overall program responsibilities include preparing required reports regarding Title VI compliance and initiating activities such as:
 - Developing procedures and compliance monitoring processes.
 - 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 Title VI discrimination 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 ADOT's annual FHWA Title VI Plan and Title VI Goals and Accomplishment Report.
- 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).

Title VI Program Manager

The Title VI Program Manager reports to the Title VI/ADA Nondiscrimination Program Coordinators 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 are not limited to:

- Providing guidance and technical assistance on Title VI matters. Overall program responsibilities include preparing required reports regarding Title VI compliance and initiating activities such as:
 - Developing procedures and compliance monitoring processes.
 - 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 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 updates to ADOT's annual FHWA Title VI Plan and Title VI Goals and Accomplishment Report.
- 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' LAPs.
- Providing subrecipients with Title VI training, technical assistance, resources, and best practices for aiding subrecipient compliance.
- Providing Title VI and External ADA/504 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.
- Developing procedures for collecting statistical data on race, color, and national origin for participants and beneficiaries of the state highway program.

ECR Specialists

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

- Assisting in updating ADOT's annual FHWA Title VI Plan and Title VI Goals and Accomplishment Report.
- 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, ensuring 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.
- Attending randomly selected ADOT public meetings or hearings to ensure compliance with Title VI.
- Participating in project meetings as a member of ADOT project teams.
- Reviewing Title VI Plans for ADOT FHWA subrecipients to include Metropolitan Planning Organizations (MPOs), Councils of Governments (COGs) 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.
- Monitoring completion rates for required annual Title VI training (MDT1097).

B. Title VI Liaison Program and Roles

To ensure compliance with Title VI throughout ADOT, ECR 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).
 - Transportation Planning; Programming; Research Center; Corridor Planning; GIS Analysis; Traffic Safety Group; Data Analytics; Modeling and Forecasting; Airport Development; and Contracts and Compliance.
- Procurement Services.
 - Procurement and Engineering and Consultant Section (ECS).
- Project Delivery and Operations.
 - Contracts and Specifications (C&S); Construction Group; Environmental Planning (EP); Right-of-Way (ROW) Group; Local Public Agency (LPA) Section; and Project Management Group.
- Alternative Delivery/Major Projects (ADMP).
 - Public Private Partnership (P3) Initiatives.
- Employee and Business Development.
 - Small Business and Workforce Development (SBWD).
- Business Enterprise.
 - State Transportation Board.

The Title VI 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 ECR 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 ECR's 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. Title VI Liaisons meet periodically throughout the year to receive training on all components of ADOT's Title VI Nondiscrimination Program.

Title VI Quarterly Report

Quarterly, Title VI Liaisons submit a Title VI quarterly report on behalf of their program area. The information submitted assists ECR in ensuring Title VI nondiscrimination throughout ADOT's programs and activities. Additionally, the data received is used to develop ADOT's Annual Goals and Accomplishment Report, which is submitted to FHWA. Some Liaisons provide supplemental documentation containing demographic data specific to the participants and beneficiaries of their programs for analysis by ECR.

Title VI Quarterly Report Contents

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

- Description of any public education and public project documents disseminated to the public.

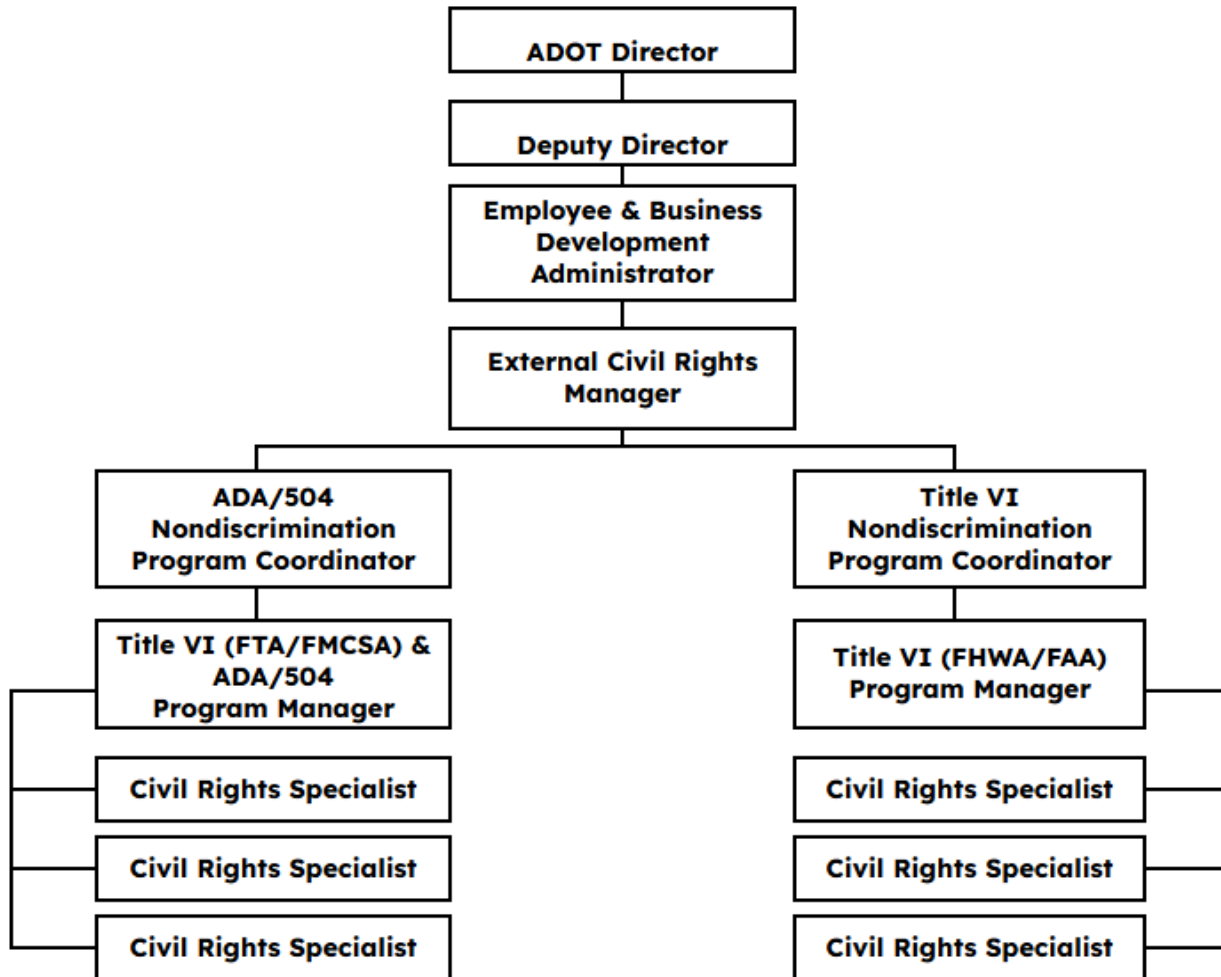
- A description of any public meetings, auctions, pre-bid conferences, or any other ADOT-hosted public events.
- The number of requests for language assistance services received and provided.
- A description of any discrimination-related complaints received.
- Title VI training requests for program areas.
- 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

ECR 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 considered during the high/low risk assessment process used to prioritize and identify program areas for a future Title VI Compliance Review. Additional information regarding demographic data collection and analysis is discussed further in Section Four of this plan titled: Program Areas, Data Collection, Reporting and Analysis.

C. ADOT Organization Charts

The ADOT organizational chart can be found here:
<https://azdot.gov/about/inside-adot/organization-chart>.

Below is the organizational chart for ADOT ECR:



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 include:

ADOT's Title VI Plan

An electronic copy of ADOT's Title VI Plan is available on ADOT's website:
<https://azdot.gov/business/title-vi-program>.

ADOT's Nondiscrimination Notice to the Public Posters

ADOT Nondiscrimination Notice to the Public posters and self-identification survey cards are made accessible at every public hearing and meeting. These posters are available in English and Spanish, and other languages when needed. ADOT's Nondiscrimination Notice to the Public posters are visibly posted in areas accessible to the public in all ADOT buildings, statewide and are available on ADOT's website: <https://azdot.gov/business/title-vi-program>.

ADOT's Public Involvement Plan (PIP)

The ADOT 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 current PIP is available on ADOT's website: <https://azdot.gov/planning/transportation-planning/public-involvement-plan>.

ADOT's 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>.

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, ADOT's LAP sets forth standards to identify language needs for all community members in the state. The LAP 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 37 of this plan.

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 beneficiaries of its programs. ECR staff work with Title VI Liaisons/program area staff to collect and analyze demographic data. Demographic data specific to each program area is collected through the Title VI quarterly reports and the Civil Rights meeting summaries; the information is compiled and reported annually in ADOT's Goals and Accomplishment report which is submitted to FHWA. Demographic data collected is analyzed and used to determine future procedural updates to the Title VI Plan and assists to identify program areas for future reviews. Outlined below are the processes each program area uses for collecting demographic data, reporting, and analysis.

A. Public Outreach and Involvement

The cornerstone of Title VI compliance in all ADOT programs is outreach and public involvement. The ADOT PIP is designed to provide early, often, and continuous outreach to all communities. ECR staff periodically reviews project public involvement plans (PIPs), language need assessments, and other public-facing materials. Furthermore, ECR staff may attend 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 the ADOT Title VI Plan, ADOT PIP, and ADOT LAP.

Various program areas within ADOT convene public meetings or events in which the public is invited to participate. When ADOT program areas convene public meetings or hearings, the program area must submit a Civil Rights meeting summary to ECR within two weeks of the event. The following are procedures applicable to all ADOT program areas to ensure Title VI compliance in public involvement.

Civil Rights Meeting Summary Contents:

- Name/Purpose of Meeting.
- Date/Location and Summary of Meeting.
- 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.
- 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.
- Photo of the sign-in sheet, Nondiscrimination Notice Poster, and self-identification cards

Upon receipt of a meeting summary, ECR staff conducts a review using the following criteria:

- 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 materials to ensure they contain ADOT's Title VI nondiscrimination language.
- Review media outlets and networks used to ensure access to all 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 the U.S. Census data, school districts, forms or surveys, GIS systems, etc.
- Review the data reported through self-identification cards or staff racial estimates are representative of the demographics 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, ECR may provide the program area with recommendations and/or best practices to ensure future compliance with Title VI, the ADOT PIP and ADOT LAP.

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

Multimodal Planning Division (MPD)

As part of the Statewide Planning Process, ADOT MPD works with Community Relations staff to develop public outreach plans. An extensive statewide public involvement process is conducted for the State Long-Range Transportation Plan (LRTP), the State Transportation Improvement Program (STIP), and the Five-Year Transportation Facilities Construction Program (Five-Year Program), which may include public review, collection of comments, and public hearings. All public involvement is conducted in compliance with Title VI requirements as stipulated in the ADOT PIP and LAP. In this partnership for outreach efforts, ECR staff analyze proposed outreach efforts using demographic maps that display race, ethnicity, and language needs data from the U.S. Census at the census tract level. ECR staff analyze this demographic data to evaluate the planned outreach and provide feedback to Community Relations staff and/or Planning Specialists. This feedback is then considered in the planning of future outreach activities.

The Priority Planning Advisory Committee is responsible for updating and preparing the Five-Year Transportation Facilities Construction Program, during these public meetings demographic data (race) is collected through self-identification cards. The Civil Rights meeting summaries are provided to ECR within two weeks of each public meeting. ECR staff conduct an analysis of participant demographics.

Information regarding ADOT MPD can be found here:

- Public involvement during the planning and programming process is detailed in the ADOT PIP can be found here:
<https://azdot.gov/planning/transportation-planning/public-involvement-plan>.
- Public and key stakeholder outreach for the State LRTP can be found here:
<https://azdot.gov/planning/transportation-programs/state-long-range-transportation-plan/documents-state-long-range>.
- The Board-approved State LRTP can be found here:
<https://azdot.gov/planning/transportation-programs/state-long-range-transportation-plan>.
- Information regarding the STIP can be found here:
<https://azdot.gov/planning/transportation-programming/state-transportation-improvement-program-stip>.
- ADOT's Five-Year Program, which is prepared and revised annually can be found here:
<https://azdot.gov/planning/transportation-programming/five-year-program>.

Research Center

The Research Center submits Title VI quarterly reports to ECR documenting the program area's Title VI activities. The Research Center also attends Title VI Liaison training meetings. The Research Center reports to ECR any completed four-factor analyses for language as conducted for a study. Four-factor analyses conducted for language are reviewed by ECR staff to ensure the language needs of the study area were considered. When applicable, the Research Center may utilize surveys. In these instances, demographic data (race) are collected from survey respondents. ECR may analyze demographic data to ensure equal access has been afforded to all potential research participants. The Research Center has not conducted a study that has utilized surveys this fiscal year.

Information regarding the ADOT Research Center can be found here:

<https://azdot.gov/planning/research-center>.

Construction

The Construction Group submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and provides a list of construction activities. The Construction Group also attends Title VI Liaison training meetings.

Information regarding the ADOT Construction Group can be found here:

<https://azdot.gov/business/engineering-and-construction>.

Public Private Partnership (P3) Initiatives

The P3 Initiatives program area submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings.

Information regarding ADOT P3 Initiatives can be found here:

<https://azdot.gov/admp/public-private-partnerships>.

State Transportation Board

The State Transportation Board submits Civil Rights meeting summaries to ECR and displays the required ADOT Nondiscrimination Notice to the Public posters as part of its meetings. Additionally, demographic data (race) is collected through self-identification cards at all State Transportation Board meetings and is reported to ECR through Civil Rights meeting summaries within two weeks of each public meeting. ECR staff conduct an analysis of participant demographics.

Information regarding the ADOT State Transportation Board can be found here:

<https://aztransportationboard.gov>.

C. Contracts and Finance

Engineering Consultants Section (ECS)

ECS submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. Annually, ECR staff reviews contract templates and executed contracts to ensure the required Title VI language is included, in accordance with USDOT Order 1050.2A.

Information regarding ADOT ECS can be found here:

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

ADOT contract advertisements are posted on the ECS website and can be found here:

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

Procurement Group

The Procurement Group submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. Additionally, demographic data (race) on contract selection and award are reported to ECR quarterly. ECR staff reviews this data to assess nondiscrimination in the selection and award process by comparing the race of all proposers with that of the selected firms. Annually, ECR staff conducts reviews of Procurement contract templates and executed contracts to ensure the required Title VI language is included, in accordance with USDOT Order 1050.2A.

Additionally, demographic data (race) is collected through self-identification cards at Pre-Offer Conferences held by Procurement and is reported to ECR through Civil Rights meeting summaries within two weeks of each public meeting. ECR staff conduct an analysis of participant demographics.

Information regarding ADOT Procurement Group can be found here:

<https://azdot.gov/business/procurement>.

Contracts and Specifications (C&S)

The C&S Group submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. Demographic data (race) on contract selection and awards are reported to ECR quarterly. ECR staff reviews this data to assess nondiscrimination in the selection and award process by comparing the race of all proposers with that of the selected firms to identify potential trends indicating discrimination. Annually, ECR reviews contract templates and executed contracts to ensure the required Title VI language is included, in accordance with USDOT Order 1050.2A.

Information regarding ADOT C&S can be found here:

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

Information regarding current ADOT advertisements/future projects can be found here:

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

D. Environmental Planning (EP)

EP submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. Additionally, EP collects race demographic data for projects.

EP provides ECR with project environmental analyses, design plans, demographic data, public involvement materials, PIPs, and other study documentation on a project-by-project basis through a Google Drive shared folder. Additionally, EP provides ECR with a monthly list of all active Individual Categorical Exclusions (CE), Environmental Assessment (EA), and Environmental Impact Statement (EIS) for review. Furthermore, EP also submits a quarterly report summarizing all CE, EA, and EIS actions completed during the reporting period. Because Environmental Justice requirements are no longer applicable, ECR will need to determine whether additional oversight is necessary to ensure nondiscrimination in EP activities.

ECR staff analyze proposed outreach materials for compliance with ADOT's PIP and LAP by evaluating language needs and ensuring the public is informed of its rights under Title VI.

Information regarding EP can be found here:

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

E. Right-of-Way (ROW) Group

The ROW Group submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. On a quarterly basis, ROW provides the initial and final compensation offers for acquisitions along with the demographic data (race) of property owners or tenants to ECR for review and trend analysis.

Additionally, ROW staff collect 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. ECR staff analyzes the demographic data to ensure nondiscrimination in ROW activities.

Information regarding the ADOT ROW Group can be found here:

<https://azdot.gov/business/right-way-properties>.

F. Statewide Maintenance Support

The Statewide Maintenance Support Group serves to provide several support functions. The group prepares the yearly budget for Maintenance and Operations and allocates the appropriated budget to the districts. They participate in statewide meetings on maintenance and work closely with the districts to address their maintenance needs, setting high standards and rigorous quality assurance measures for statewide maintenance activities.

ECR will evaluate this newly restructured program area to identify the compliance oversight needed to ensure nondiscrimination in statewide maintenance activities.

Information related to ADOT Statewide Maintenance Support can be found here:

<https://azdot.gov/business/highway-maintenance>.

G. Communications and Public Involvement

The Community Relations staff and Communications staff for Major Projects are responsible for public outreach for ADOT projects throughout all phases of project development. Community Relations and Communications for Major Projects staff submit Title VI quarterly reports to ECR documenting all public involvement activities conducted and attend Title VI Liaison training meetings. ECR staff analyzes 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.

ECR reviews Project PIPs to assess nondiscrimination in the public participation process, and ensure compliance with ADOT's PIP and LAP.

Community Relations and Communications for Major Projects staff collect demographic information (race and ethnicity) from attendees at public meetings using voluntary self-identification survey cards and report this demographic data to ECR, as part of the Civil Rights meeting summary, with details about the meeting purpose, notification, meeting materials and language services requested/provided, within two weeks after public meeting events. ECR staff analyzes the demographic data within the project area and the outreach activity. Based on the results of the data analyzed, ECR may provide recommendations, which ensure continued nondiscrimination in public outreach activities.

Information regarding Communications and Public Involvement can be found here:

- <http://www.azdot.gov/projects>.
- <https://azdot.gov/planning/transportation-studies>.

H. Local Public Agency (LPA) Section

The LPA Section submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings. The LPA Section also notifies ECR 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. The LPA Section updates ECR on the status of their annual reviews for CAs. ECR may offer technical assistance to CAs to help resolve any contract-related Title VI deficiencies. Additionally, ECR reports all completed Title VI subrecipient compliance reviews for LPAs to the LPA Section (as detailed in Section 6, Subrecipient Review Procedures).

Information regarding ADOT LPA Section can be found here:

<https://azdot.gov/business/programs-and-partnerships/local-public-agency>.

I. Small Business and Workforce Development (SBWD)

The SBWD group submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings.

SBWD displays the ADOT Nondiscrimination Notice to the Public at Task Force meetings, which are open to the public. Nondiscrimination language is incorporated in all public material including public involvement materials such as notices for On-the-Job Training (OJT), other supportive services offered to Disadvantaged Business Enterprises (DBEs), and notifications for DBE Disparity Studies. ECR staff reviews the material for compliance with ADOT's PIP and LAP. Additionally, SBWD staff report to ECR the demographic information (race) collected from attendees at Task Force Meetings and OJT program participation. This demographic data is analyzed by ECR staff to ensure nondiscrimination and to support SBWD's outreach efforts.

Information regarding ADOT SBWD can be found here:

<https://azdot.gov/business/small-business-and-workforce-development>.

J. Project Management Group (PMG)

The PMG submits Title VI quarterly reports to ECR documenting the program area's Title VI activities and attends Title VI Liaison training meetings.

Information regarding ADOT PMG can be found here:

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

TITLE VI INTERNAL PROGRAM AREA COMPLIANCE REVIEW PROCEDURES

A. ADOT Title VI Internal Monitoring Program

ADOT's Title VI internal monitoring program is designed to ensure Title VI compliance throughout ADOT. ADOT must ensure all of its programs and activities are operated in a nondiscriminatory manner.

To monitor ADOT's compliance, ECR reviews and analyzes Title VI quarterly reports submitted by program areas. Program areas submit quarterly reports that may include demographic data collected; project information disseminated; policy and organizational updates; and complaints received or reported. Additionally, language assessments conducted for project public outreach are reviewed by ECR and applied to the project public outreach. ECR conducts Title VI internal program area compliance reviews on an annual basis using a high/low risk assessment. Additionally, Title VI liaison-level training is also conducted several times a year 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.

B. Annual Title VI Internal Compliance Reviews

Per FHWA guidance, ADOT's assessment of a program area for Title VI compliance involves five core elements:

- Organization and staffing.
- Program plans and documents.
- Program implementation, including policies and procedures.
- Demographic data collection and analysis.
- Title VI personnel interviews.

To determine if these five core elements are adequately addressed, ECR reviews 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 their overall understanding of Title VI requirements.

Program area reviews are conducted to ensure compliance with federal Title VI requirements, provide technical assistance and training in the program area's implementation of Title VI, and correct deficiencies, when found to exist. Annually, ECR conducts a High/Low Risk Assessment on each ADOT program area participating in the Title VI Liaison program. This assessment determines the program area(s) that will be reviewed that year. The High/Low Risk Assessment for internal program review is based on the following:

- Deficiencies in providing Title VI quarterly reports.

- Deficiencies of Civil Rights meeting summaries provided.
- 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

- Program areas are electronically notified by ECR of the intended review 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.
- 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 a program area is identified for a comprehensive Title VI compliance review, electronic notice is provided to the program area's director, ECR Manager, ADOT Title VI Program Coordinator, ECR Title VI Program Manager and the Title VI Liaison. The notice outlines:

- The date for the Title VI compliance review, which will occur 35 calendar days following the date of the notice.
- The date by which all internal policies, procedures, and Title VI questionnaire must be submitted to ECR, which will be no less than 30 calendar days from the date of the notice.
- The review process.

The Title VI Compliance Review Questionnaire submitted to ECR includes:

- Demographic data collection methods.
- Sample contracts demonstrating that required nondiscrimination provisions are included.
- Samples of public involvement materials, including meeting notices, project flyers, and other public documents demonstrating compliance with LAP requirements.
- LAP efforts.
- Directive and policy updates.
- Title VI Training efforts.
- Title VI complaints, if any received directly by the program area.

If Deficiencies Are Identified

- 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, ADOT Title VI Program Coordinator, ECR Title VI Program Manager, and the Title VI Liaison.
- Within 30 calendar days of the Title VI program findings report, a meeting is scheduled with ECR to discuss possible technical assistance and an action plan toward full compliance.
- Outstanding high-priority items, such as missing Title VI assurances in contracts or noncompliance with ADOT's PIP, must be addressed within 30 calendar days of the report being issued.
- The program is required to submit a formal action plan within 45 calendar days of the report issuance.
- If the program area's staff completion rate for the Title VI computer-based training is below 80 percent, ECR will provide training prior to closing the review.
- The program area must correct all deficiencies within a reasonable period of time, not to exceed 90 calendar days from receipt of the Title VI program findings report.
- If the program area remains noncompliant after the applicable corrective action period, ECR will elevate the deficiency finding to the ADOT Director.

If No Deficiencies Are Identified

- A formal notification of full compliance is provided within 30 calendar days of review, along with a report of findings.
- The report may include recommendations for strengthening Title VI compliance in the program area.
- If the program area's staff completion rate for the Title VI computer-based training is below 80 percent, ECR will provide training prior to closing the review.

Follow-up Monitoring

At the conclusion of the review, ECR may determine if additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

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):

MPO Subrecipients:

- Yavapai Plan (YPlan), formerly Central Yavapai MPO.
- MetroPlan Greater Flagstaff, formerly Flagstaff MetroPlan.
- Lake Havasu MPO (LHMPO).
- Maricopa Association of Governments (MAG).
- Pima Association of Governments (PAG).
- Sierra Vista MPO (SVMPO).
- Sun Corridor MPO (SCMPO).
- Yuma MPO (YMPO).
- Bullhead City MPO (BHCMPO).

COG Subrecipients:

- Central Arizona Association of Governments (CAG).
- Northern Arizona COG (NACOG).
- Southeastern Arizona Governments Organization (SEAGO).
- Western Arizona COG (WACOG).

CA Subrecipients:

- 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. 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 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:

- Title VI Nondiscrimination policy statement, including:
 - Express commitment to the Title VI nondiscrimination program.
 - Policy signed by the Chief Administrative Officer.
 - Includes basis of Title VI (race, color, national origin).
 - Process by which the policy statement is circulated throughout the organization and made available to the public.
 - List of all relevant federal statutes, regulations, executive orders, and other legislation.
- Subrecipient Title VI organization and staffing information, including:
 - Identification of the Title VI Coordinator and program area.
 - Description of the Civil Rights Title VI Coordinator showing relation to the top executive, as shown on an organizational chart.
 - Outline the roles and responsibilities of the Title VI Coordinator and others assisting with Title VI obligations.
- Federal-aid program areas, including:
 - Description of program areas.
 - Title VI compliance monitoring responsibilities for each area.
- Title VI Standard Assurances and Appendices (USDOT Order 1050.2A).
- Data collection procedures:
 - Describe how the organization collects demographic data.
 - Describe what demographic data is collected.
 - Describe how the demographic data is analyzed.
 - Describe how often demographic data is collected.
- Complaint procedures, including:
 - Process for filing complaints and complaint form.
 - Description of investigative process for complaints.
 - Responsible agency staff.
 - Time limits to submit complaints and forward to ADOT.
- Annual Goals and Accomplishment Report:
 - Number of program area reviews conducted, results of the review, actions taken, and actions planned.
 - Number and type of compliance reviews conducted for subrecipients.
 - Title VI-related training provided for agency staff and/or subrecipients.
 - Summary of Title VI complaints filed with the agency.
 - Number of compliance reviews planned for the upcoming year.
- LAP efforts:
 - Description of the method that the agency will follow in order to assess language needs for the agency's boundaries.
 - Describe how the agency informs the public that language access services are available.
- Training Procedures:
 - Describe how and when members of the agency are trained on Title VI Program requirements and responsibilities.
 - Include procedures as to how and when training will be conducted for other stakeholders.

Title VI Requirements for SAs

In order to qualify for ADOT federal funding, SAs are required to demonstrate Title VI compliance by submitting to ECR their methods of administration prohibiting discrimination, which include:

- Designating a point of contact to coordinate ADA and Title VI efforts.
- A process to collect demographic data on their programs and activities.
- A risk-based process to review programs and activities covered by Title VI.
- Procedures to route ADA and Title VI complaints.
- A complaint form to receive FHWA ADA and Title VI complaints.
- An ADA policy.
- Signed Title VI Standard Assurances and Appendices (DOT 1050.2).
- Maintaining ADA and Title VI tracking logs for agency training, discrimination complaints, interpretation and translation services, and reasonable accommodations.
- Providing a list of locations where ADOT's ADA/Title VI Notice to the Public is posted.

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 their programs and activities are operated in a nondiscriminatory manner.

ADOT ECR requires subrecipients to provide an updated Title VI Implementation Plan and Goals and Accomplishment Report on an annual basis to document their Title VI compliance efforts and progress. The annual report should identify accomplishments the subrecipient has achieved in the area of Title VI, such as program area reviews, training, and the processing of Title VI complaints, as well as goals for the upcoming year related to their Title VI Program.

Annual reports are analyzed and categorized based on a high/low risk assessment. Following the completion of 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 their level of compliance with Title VI requirements. Annually ADOT conducts on-site reviews of a minimum of three to four agencies. 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

The high/low risk assessment for MPO/COG/CA compliance reviews is based on the following:

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

Notification Process

Subrecipients are notified by ECR at least 35 calendar days prior to the Title VI on-site compliance review through electronic notification. Prior to the on-site visit, the subrecipient provides policies, procedures, and sample documents for a desk audit.

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

- Date for the Title VI on-site compliance review visit, which will occur at least 35 calendar days following the date of the notice.
- Due date for all internal policies, procedures, and Title VI on-site questionnaire to be submitted to ECR.
- Title VI on-site compliance review process.

Title VI On-Site Compliance Review Questionnaire

The Title VI on-site questionnaire submitted to ECR includes:

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

Desk Review for the On-site

Prior to an on-site review, ECR reviews the following items:

- Annual Goals and Accomplishment 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

During the on-site review, ECR will:

- Conduct staff interviews.
- Review data collection and analysis processes.
- Review FHWA-funded contracts for Title VI Assurances.
- View and document public nondiscrimination notice locations.
- Review public notification and participation practices.
- Discuss language access efforts.
- Examine the efficiency of Title VI complaint procedures.
- Provide verbal and written recommendations for best practices.

If Deficiencies Are Identified:

- Within 30 calendar days of the on-site review visit, deficiencies are documented in a report provided to the agency's Director, agency's Title VI Coordinator, ECR Manager, ADOT Title VI Program Coordinator, ECR Title VI Program Manager, and ADOT's LPA Section (for a CA agency) or MPD oversight group (for an MPO/COG agency).
- Within 30 calendar days of the report issuance, a meeting will be scheduled to discuss possible technical assistance and an action plan toward full compliance.
- Outstanding high-priority items, such as signed Title VI assurances, must be submitted within 30 calendar days of the report issuance.
- The subrecipient is required to submit a formal action plan within 45 days of the report issuance.
- The subrecipient should correct all deficiencies within a reasonable period of time, not to exceed 90 calendar days from receipt of the report.
- If the subrecipient does not achieve compliance, ADOT makes a formal funding recommendation to the appropriate oversight division and/or federal authority.

If No Deficiencies Are Identified:

- A formal notification of full compliance is provided to the agency's Director, agency's Title VI Coordinator, ECR Manager, ADOT Title VI Program Coordinator, ECR Title VI Program Manager, and ADOT's LPA Section (for a CA agency) or MPD oversight group (for an MPO/COG agency) within 30 calendar days of the on-site review along with a report of findings.
- 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 ECR. ECR may determine whether additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

B. Subrecipient Compliance Review Process - SAs

Annually, ECR conducts the following high/low risk assessment to select subrecipients (SAs) for desk reviews. ADOT's goal is to conduct annual desk reviews of twenty percent of active SAs. ECR collaborates with the SA's Title VI designated point of contact to facilitate and report the desk review findings. As of August 21, 2026, ADOT does not have an active SA project.

The High/Low Risk Assessment for SA 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 Identified:

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

If No Deficiencies Are Identified:

- A formal notification of full compliance is provided, within 30 calendar days of the desk review to the agency's Director, agency's Title VI Coordinator, ECR Manager, ADOT Title VI Program Coordinator, ECR Title VI Program Manager, and ADOT's LPA Section (for a CA agency). The report may provide recommendations for strengthening the SA's Title VI compliance program.

Follow-up Monitoring

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

TITLE VI TRAINING

ADOT implements the required annual Title VI nondiscrimination training program for all ADOT staff, consultants, and contractors that are providing services on behalf of ADOT. Additionally, on an annual basis, ECR provides Title VI training for ADOT subrecipients.

ADOT's staff training program is composed of two levels of training with varied intensity and content.

- All ADOT staff, consultants, and contractors providing services on behalf of ADOT are required to complete ADOT's Title VI Nondiscrimination computer-based training (MDT1097W) on an annual basis. The training provides information related to general Title VI 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 ECR.
- Title VI Liaison Level: This training is conducted several times a year 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 cascading 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.

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

- On an annual basis MPO, COG, and CA Title VI coordinators are provided 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.
- SAs receive Title VI training when becoming a subrecipient of FHWA funds from ADOT. Additional training is identified from desk reviews conducted by ECR 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.

COMPLAINT PROCEDURES

External Complaint Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987 or the ADA/Section 504 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. See **Attachment B** for ADOT's Discrimination Complaint Form.

1. All Title VI 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.
 - a. For FHWA Title VI complaint process email: fhwa.titlevi@dot.gov
2. All public disability related and other discrimination under Title VI complaints filed against ADOT in programs not funded by FHWA will be reviewed under ADOT's authority and jurisdiction for processing. Complaints outside of ECR's jurisdiction will be referred to as appropriate.
3. 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>
4. 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.
5. 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.
6. Complaints may be filed by one of the following methods:

- a. Completing and signing a complaint form and delivering it in person, by mail or emailing the complaint form to ECR.
 - b. Calling the ECR where information is used to complete the complaint form and forwarded to the complainant for review, and signature.
 - c. Electronically submitting and digitally signing the complaint form.
- 7. All Title VI 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.
- 8. 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

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				

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

ACRONYMS

ADA	Americans with Disabilities Act
ADOT	Arizona Department of Transportation
CA	Certification Acceptance Agencies
CAG	Central Arizona Association of Governments
CE	Categorical Exclusions
CFR	Code of Federal Regulations
COG	Council of Governments
C&S	Contracts and Specifications
ECR	External Civil Rights
DBE	Disadvantaged Business Enterprise
EA	Environmental Assessment
ECS	Engineering Consultants Section
EIS	Environmental Impact Statements
EO	Executive Order
EP	Environmental Planning
FAA	Federal Aviation Administration
Five-Year Program	Five-Year Transportation Facilities Construction Program
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FTA	Federal Transit Administration
LAP	Language Access Plan
LHMPO	Lake Havasu Metropolitan Planning Organization
LPA	Local Public Agency
L RTP	Long-Range Transportation Plan
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
NHTSA	National Highway Traffic Safety Administration
OJT	On-the-Job Training
P3	Public Private Partnership
PAG	Pima Association of Governments (Tucson metro area)
PIP	Public Involvement Plan
ROW	Right-of-Way
SA	Self-Administered LPA
SBWD	Small Business Workforce Development
SCMPO	Sun Corridor Metropolitan Planning Organization
SEAGO	Southeastern Arizona Governments Organization
STIP	State Transportation Improvement Plan
SVMPO	Sierra Vista Metropolitan Planning Organization

TITLE VI PLAN	Title VI Nondiscrimination Implementation Plan
USDOT	United States Department of Transportation
WACOG	Western Arizona Council of Governments
YMPO	Yuma Metropolitan Planning Organization
YPLAN	Yavapai Plan (formerly Central Yavapai MPO)

NONDISCRIMINATION AUTHORITIES

Additional information related to Nondiscrimination authorities can be found here:

- [Title VI of the Civil Rights Act of 1964.](#)
- [23 CFR Part 200.](#)
- [49 CFR Part 21.](#)
- [The Age Discrimination Act of 1975.](#)
- [Title II of the Americans with Disabilities Act.](#)
- [Title III of the Americans with Disabilities Act.](#)
- [Section 162\(a\) of the Federal-Aid Highway Act of 1973.](#)
- [The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.](#)