



# 2015 Recertification Acceptance Agreement



# ADOT Local Public Agency Title VI General Compliance Requirements



# OVERVIEW

The Arizona Department of Transportation (ADOT) is a recipient of federal financial assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (“Title VI”).



# WHAT IS TITLE VI?



# TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.”



# ADDITIONAL PROTECTED GROUPS

**Federal Aid Highway Act of 1973, Section 504 of the 1973 Rehabilitation Act, and the 1975 Age of Discrimination Act,** extends requirements of Title VI to include the prevention discrimination on the grounds of age, sex, disability and income status.



# TITLE VI APPLIES INSTITUTION-WIDE

**Civil Rights Restoration Act of 1987-** added the requirement that Title VI applies **institution-wide**; it is not limited to the program that receives federal funding (e.g., planning, capital, operations)



# BACKGROUND AND PURPOSE OF TITLE VI





# PURPOSE OF TRAINING

ADOT MUST ensure all subrecipients are aware and abide by the provisions of Title VI and similar statutes. In addition, this training aims to provide guidance on the minimum requirements to be in compliance with its rules, laws and regulations.

# TITLE VI FEDERAL REQUIREMENTS



# KEY ELEMENTS OF A TITLE VI PROGRAM

- Policy Statement
- Signed Title VI Assurances.
- Organization and Staffing
- Program Area Review Procedures
- Special Emphasis Program Areas
- Contractors, Consultant and Vendor Review Procedures
- Data Collection
- Training
- Complaint Procedures
- Dissemination of Title VI Information
- Limited English Proficiency
- Environmental Justice

# Additional Elements include:

- Public Participation Plan
- Review Local Government Directives
- Compliance & Enforcement Procedures



# PROVIDE A POLICY STATEMENT

- Expressed Commitment to the Title VI Program
- Delegation of Authority to the Title VI Program Coordinator **with** contact information.
- Must** be signed by head of agency.
- Circulated throughout the agency and made available to the public
- Must** be updated if administration changes or every three years with assurances.



Janice K. Brewer, Governor  
John S. Hallkowsky, Director  
John H. Nichols, Deputy Director

September 22, 2014

## TITLE VI AND RELATED STATUTES NONDISCRIMINATION POLICY STATEMENT

The Arizona Department of Transportation (ADOT) as policy assures full compliance with Title VI of the Civil Rights act of 1964, The Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI states that no person shall on the grounds of race, color, national origin, age, sex, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any ADOT sponsored program or activity. There is no distinction between the sources of funding.

ADOT also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, the department will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When ADOT distributes Federal-aid funds to another entity, ADOT will ensure all subrecipients fully comply with ADOT's Title VI Nondiscrimination Program requirements.

John Hallkowsky  
Director

ARIZONA DEPARTMENT OF TRANSPORTATION  
206 S. 17th Ave. | MD 155A | Phoenix, AZ 85007 | adot.gov

# PROVIDE SIGNED TITLE VI ASSURANCES

- Title VI Assurances is STANDARD** contract language provided by FHWA which contractually obligates the agency's commitment to Title VI;
- MUST** be signed by the head of agency for all subrecipients as is/ without alteration;
- Appendices **A & E** that **MUST** be included in all federally funded projects and **B,C, & D** Should be included in corresponding contracts;
- MUST BE RESIGNED** every three years or at change of administration.

## Arizona Department of Transportation Title VI/Non-Discrimination Assurances

The Arizona Department of Transportation [herein referred to as the "Recipient"], HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through *Federal Highway Administration*, is subject to and will comply with the following:

### Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 [entitled *Non-discrimination in Federally-Assisted Programs Of The Department Of Transportation--Effectuation Of Title VI Of The Civil Rights Act Of 1964*];
- 28 C.F.R. section 50.3 {U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964};
- 23 C.F.R. Part 200 Subchapter C-Civil Rights (Title VI program implementation and related statutes)

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

### General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda and/or guidance, the Recipient hereby gives assurances that it will promptly take any measures necessary to ensure that:

*"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.*

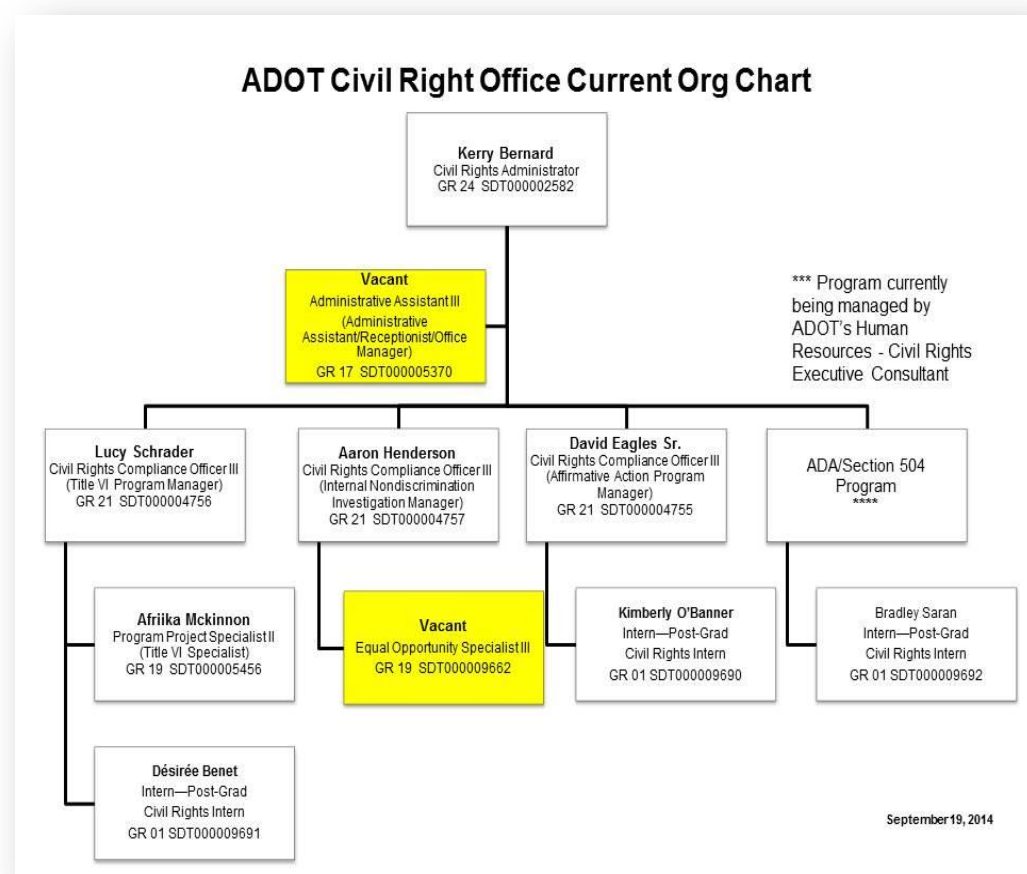
The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

### Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its *Federal Aid Highway Program*.

# ORGANIZATION AND STAFFING

- ❑ LPA's MUST assign a Program Coordinator to administer the Title VI program;
- ❑ LPAs should describe the relationship between the coordinator and the head of the agency;
- ❑ Include an organizational chart;
- ❑ Outline the roles and responsibilities of the Title VI Coordinator and other Staff members that help administer the program.



# SUGGESTED TITLE VI PROGRAM COORDINATOR DUTIES

- Ensure nondiscrimination in the agency.
- Ensure agency's contracts contain the appropriate Title VI contract provisions.
- Aid in the development of procedures for processing internal and external discrimination complaints.
- Monitor Subcontractors and Consultants
- Investigate Complaints against subcontractors and consultants.
- Maintain a Title VI Complaint Log.
- Collect and Analyze data to ensure nondiscrimination
- Maintain Records.
- Provide ADOT the agency's Public Participation Plan
- Provide ADOT the agency's' Limited English Proficiency Plan
- Provide ADOT with a Title VI reports and yearly updates.

**Title VI Program Coordinator MUST have decision making authority to make resolutions for the agency (**We would not recommend assistants in this position**).**



# Identify the Program Coordinator on the agency's Notice to the Public

- ❑ Members of the community **MUST** have a direct contact to file a Title VI/nondiscrimination complaint; therefore, subrecipients are required to identify a Title VI Program Coordinator.
- ❑ The Title VI Program Coordinator **must** be provided (with full contact information) on all Title VI publicly disseminated documents.
- ❑ If necessary, place in alternative languages



# PROGRAM AREA REVIEW PROCEDURES

- ❑ Title VI Program Coordinators must develop procedures for conducting yearly reviews of pertinent agency program areas with Title VI responsibilities;
- ❑ The Process should define:
  - The Types of reviews and their objectives
  - What activities will be reviewed for the program
  - What data will be sought from the program
  - How the data obtained will be analyzed
  - How the review will determine the effectiveness
- ❑ In describing the process for conducting reviews, LPA should include how it will determine the effectiveness of each program area.

# PROGRAM AREA REVIEW PROCEDURES

The LPA should consider developing a RISK BASED approach for Program Area reviews.

- 1) Based on public interaction, identify high risk, possibly medium risk, and definitely low risk departments (Example: Communications possibly high risk while Maintenance possibly low risk);
- 2) Choose a representative sample of data from each risk category for review annually;
- 3) If deficiencies are found allow develop a Corrective Action Plan to aid the department in correcting deficiencies;
- 4) Provide follow up and assistance where necessary.

# SPECIAL EMPHASIS PROGRAM AREAS

- ❑ A Special Emphasis Program Area is a Program Area in which the LPA has identified a trend or pattern of discrimination during Program Area reviews.
- ❑ By identifying a Program Area as a Special Emphasis Program Area, the LPA is able to not only track the progress made, but to also report on the progress made in the Annual Report.
- ❑ This section of the Title VI Plan should describe the process the LPA uses to identify their special emphasis program areas and how they address identified trends or patterns of discrimination in those areas.

# CONSULTANT, CONTRACTOR AND VENDOR REVIEWS

LPA's **must** develop procedures for conducting reviews of sub-recipients (consultants, contractors, vendors , etc.)

- ❑ Describe the process for conducting reviews of the LPAs sub-recipients. The process should define:
  - A schedule or amount of reviews anticipated per year,
  - The types of reviews and their objectives,
  - Where and when the outcome of the reviews will be reported,
  - What activities will be reviewed, and
  - How will the review determine effectiveness.

# DATA COLLECTION

The LPA should develop a process for collecting data. The process should explain the following:

- How the LPA collects data
- What data is collected
- How the data is analyzed

The LPA should collect Title VI Program-related data on an on-going basis. The data collected needs to be directly related to the specific process in a Program Area

# DATA COLLECTION Continued...

**Example:** LPA's Right-of-Way is responsible for the valuation of impacted properties, negotiations with impacted property owners, and the relocation of impacted property owners and tenants. Project data regarding the **race, color, national origin, sex, age, and disability (including low-income and Limited English Proficiency)** of the following:

- Property owners of parcels valued,
- Property owners receiving written offers of just compensation, and
- Property owners/tenants relocated should be collected.

Right-of-Way Liaison(s) should analyze the data to determine if property valuations were conducted in a non-discriminatory manner, if property owners were negotiated with in a non-discriminatory manner, and if Relocation Benefits were calculated in a non-discriminatory manner.

# TRAINING

Training is required of both LPA staff members and LPA Subrecipients:

- Describe how and when the Title VI Program Coordinator and other employees within the agency will be trained on Title VI Program requirements and responsibilities
- Describe procedures as to how and when training will be conducted for subrecipients and stakeholders



# COMPLAINT PROCEDURES

Describe the LPAs procedures for prompt processing, investigation, and resolution of Title VI Program complaints received by the LPA. Procedures must include:

- A description of the complaint process identifying how and where a complaint would be filed, with which department or person, and all applicable timeframes.
- A statement that investigations will be conducted by personnel trained in compliance investigations.
- A description of the process by which the LPA will track the complaints and keep the required data for each complaint received.
- Procedures by which each complaint received by the LPA, along with the LPA report of investigation will be sent to the ADOT Civil Rights Office in the required 60 day time period.

# COMPLAINT FORM

- ❑ The LPA **MUST** have a complaint form that discloses full contact information and is signed by the complainant.
- ❑ Complaints **MUST** be maintained in a FHWA approved complaint log
- ❑ If population meets the community threshold, make sure complaint forms are provided in alterative languages.

**ADOT** Title VI Complaint Form

*Note: The following information is needed to assist in processing your complaint.*

Complainant's Information:  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Person Discriminated Against (someone other than complainant)  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Which of the following best describes the reason you believe the discrimination took place?  
 Race/Color (Specify) \_\_\_\_\_  National Origin (Specify) \_\_\_\_\_  
 Sex (Specify) \_\_\_\_\_  Age (Specify) \_\_\_\_\_  Disability (Specify) \_\_\_\_\_

On what date(s) did the alleged discrimination take place? \_\_\_\_\_

Describe the alleged discrimination. Explain what happened and who you believe was responsible. (If additional space is needed, add a sheet of paper).  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List names and contact information of persons who may have knowledge of the alleged discrimination.  
\_\_\_\_\_  
\_\_\_\_\_

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Check all that apply.  
 Federal Agency  Federal Court  State Agency  State Court  Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Please sign below. You may attach any written materials or other information you think is relevant to your complaint.  
\_\_\_\_\_  
Complainant Signature Date Number of attachments: \_\_\_\_\_

Submit form and any additional information to:  
ADOT Civil Rights Office  
Title VI Program Manager  
206 S. 17th Avenue, Mailstop 155A  
Phoenix, AZ 85007  
Phone: 602.712.8946 • Fax: 602.239.6257  
[www.azdot.gov](http://www.azdot.gov)

# COMPLAINT LOG

All recipients shall prepare and maintain a list of **any** complaints that **allege discrimination** on the basis of race, color, national origin, age, sex or disability by including the following:

- Case number
- Complainant
- Respondent
- Agency Filed With
- Date Filed
- Basis
- Date of Report
- Decision

This list shall be included in the Title VI Program Plan submitted to ADOT every annual update.

# COMPLAINT LOG

TITLE VI COMPLAINT LOG  
2014

CASE NO	COMPLAINANT	RESPONDENT	AGENCY FILED WITH	DATE FILED	BASIS	DATE OF REPORT	DECISION

# DISSEMINATION OF INFORMATION

The LPA should describe the process and procedures to:

- elicit and solicit public participation and involvement
- educate the public of their Title VI program rights and
- obligations in the Transportation decision-making process

The LPA should also include the tools, techniques and strategies to involve and educate the public including LEPs and develop a public involvement plan or identify a link or linkage where one already exists.

# Example ...

ADOT Uses a “NOTICE TO THE PUBLIC” to inform the community of ADOT’s nondiscrimination policy and where to file a complaint if they believe it to exist.

ADOT also disseminates pertinent information through the following methods:

- Fliers
- Brochures
- Door Hangers
- Mailings



The screenshot shows a document titled "ADOT'S TITLE VI NOTICE TO THE PUBLIC". At the top, there is a blue header with the ADOT logo. Below the header is a row of four small images: three construction workers in hard hats, a city skyline, a man in a shirt, and a group of people sitting around a table. The main text of the document is in English and Spanish. The English text states that ADOT gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. It also provides information on how to file a complaint and where to obtain Title VI Discrimination Complaint Forms. The Spanish text, titled "AVISO PUBLICO DE ADOT SOBRE EL TITULO VI", provides the same information in Spanish. At the bottom, there is contact information for the ADOT Civil Rights Office, including the name Lucy Schrader, Title VI Program Manager, and the office address and phone/fax numbers. The website address azdot.gov is also visible at the bottom right.

**ADOT'S TITLE VI NOTICE TO THE PUBLIC**

The Arizona Department of Transportation (ADOT) hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, national origin, age or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which ADOT receives Federal financial assistance.

Any person, who believes his/her Title VI protection has been violated, may file a complaint. Any such complaint must be in writing and filed with the ADOT Civil Rights Office, Title VI Program Manager within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the ADOT Civil Rights Office by contacting:

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**AVISO PUBLICO DE ADOT SOBRE EL TITULO VI**

El Departamento de Transportación del Estado de Arizona ADOT da aviso al público que es la norma de esta agencia asegurar cumplimiento total con el Título VI de la Ley de los Derechos Civiles de 1964, la Ley de Restauración de 1987, y artículos relacionados y regulaciones en todos los programas y actividades. El Título VI requiere que ninguna persona sera discriminada por razon de raza, color, pais de origen, sexo, edad o discapacidad; sera excluida de participar en, denegar servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

Cualquier persona que crea que se ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito con la Oficina de Derechos Civiles de ADOT dentro de los ciento ochenta (180) dias de la fecha en que se alega que la discriminación ocurrió. Para recibir formularios de reclamo por favor póngase en contacto con la oficina ADOT Oficina de Derechos Civiles:

**LUCY SCHRADER**  
TITLE VI PROGRAM MANAGER

**ADOT Civil Rights Office**  
206 S. 17th Avenue, Mail Drop 155-A  
Phoenix, AZ 85007  
602.712.8946  
602.238.6257 FAX

azdot.gov

# COMPLYING WITH LIMITED ENGLISH PROFICIENCY REQUIREMENTS

LPAs should describe how it reaches populations with Limited English Proficiency (LEP). This is often done through a Language Access Plan/Limited English Proficiency Plan. To Develop a LAP/LEP Plan the following steps may be used:

- Perform a Self-Assessment to determine which personnel interact with members of the public
- Identify LEP Populations State-wide using US Census data and American Survey data @ [www.census.gov/acs/www/](http://www.census.gov/acs/www/)
- Conduct a Four Factor Analysis:
  - **Demography** – Number and/or proportion of LEPs served and languages spoken in service area
  - **Frequency** - Rate of contact with service or program
  - **Importance** – Nature and importance of program/service to peoples lives (transportation)
  - **Resources** – Available resources, including Language assistance services (limited or wide-ranging)

# Four Factor Analysis

## Factor 1:

Number of LEPs eligible or likely to be encountered by your Federally funded program will be program-specific. In addition to the number or proportion of LEP persons served, the recipient's analysis should ON EACH PROJECT, at a minimum, identify:

- How do LEP persons interact with the recipient's agency?
- Who are the LEP communities? How many are there?
- What is the level of the literacy skills of LEP populations in their native languages? Will translation of documents will be an effective practice?
- LEP persons are underserved by the recipient due to language barriers?



# Four Factor Analysis

## Factor 2:

The **frequency** with which LEP persons come into contact with the program. Recipients should survey key program areas and assess major points of contact with the public, such as:

- Participation in public meetings;
- Customer service interactions;
- Highway Construction surveys; and
- Operator surveys



# Four Factor Analysis

## Factor 3:

The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

- **<\*Best Practice\*>** Facilitating meetings with LEP persons is a method to inform the recipients on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.

# Four Factor Analysis

## Factor 4:

The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by:

- technological advances,
- reasonable business practices, and the
- sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies.

However: Costs **IS NOT** a reasonable reason to justify an agency not using resources.

# COMPLYING WITH LIMITED ENGLISH PROFICIENCY REQUIREMENTS

The LPA **must** provide written translation of **vital documents** for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, by the program/activity.

- If needed the LPA may provide an interpreter for non-vital documents.



# LEP COMPLIANCE STRATEGIES

- Publish community correspondences/notifications in languages other than English
- Use Multi-language phone lines
- Use Multilingual staff in information booths
- Use Pictograms/ “I Speak” Cards
- Advertise in ethnic media
- Translate vital documents into the language of frequently encountered LEP groups

# ENVIRONMENTAL JUSTICE

The LPA should describe the process by which EJ requirements will be met. In the description include how EJ will be integrated into each program area. This can be done in the following ways:

- ❑ Describe how the LPA is collecting minority (race) and low-income population data in addition to the other nondiscrimination population data (i.e., color, national origin, sex, age, disability, LEP);
- ❑ Describe how the affected program area is using the minority (race) and low-income data to further evaluate impacts to these populations according to the EJ Executive Order and available Federal guidance (i.e., identify disproportionate and highly adverse impacts, conduct a benefits and burdens analysis, etc.)
- ❑ Describe how the affected program area is effectively including the EJ populations in all Public Participation activities;
- ❑ Include EJ populations as applicable groups on the LPA external complaint form.

# PUBLIC PARTICIPATION PLAN

A plan designed to include outreach to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program Plan submission. The public participation plan should include other populations that are traditionally underserved, such as people with disabilities, low-income, and others.



# PUBLIC PARTICIPATION PLAN INCLUDES ...

- A written plan which engages the public with the opportunity to provide input on the decision making process for Federal Aid projects and services.
- Describe strategies, procedures, and outcomes for ongoing public participation activities.
- Provide education that highlights Title VI components.
- Advertisements with Local Media Resources and Minority Newspapers
- Direct Mailings
- Public Service Announcements
- Website, Radio and Television



# REVIEW LOCAL GOVERNMENT DIRECTIVES

The purpose of this requirement is to ensure that LPA's are periodically reviewing Local Government Directives to determine if a given Directive has Title VI implications. If it is determined to have Title VI implications, then the LPA needs to interpret how the Local Government Directive impacts each program area from a Title VI perspective.

The LPA should use this section to describe how it carries out this requirement.

# REVIEW LOCAL GOVERNMENT DIRECTIVES

The Program Coordinator should review procurement changes, and new agency policies to determine if there are Title VI implications

Example: If a new procurement code excludes a town, demographic or companies from participating in the bidding process, there may be possible Title VI implications.

# COMPLIANCE AND ENFORCEMENT PROCEDURES

The LPA should describe:

- How trends or patterns of discrimination are identified and eliminated.
- How compliance reviews of sub-recipients are conducted, how compliance is determined and enforced

23 CFR 200.9(b)(14)&(15)

# OTHER OPTIONAL TITLE VI PROGRAM PLAN ELEMENTS



- Introduction; Overview; or Background
- Glossary of definitions
- Nondiscrimination Authorities & Resources
- State Laws and other mandates applicable to the Federal-aid Program and Title VI program Implementation

# REQUIREMENTS

- Submit the Implementation Plan by August 1.
- Post the Plan on your website in an appropriate and easy to access location.
- The Implementation Plan should contain the LPA's processes. Complaint logs, review outcomes, and other yearly tasks and work should be contained in a separate goals and accomplishment report.

# GOALS AND ACCOMPLISHMENT REPORTS

The Implementation Plan is designed to be a process plan. Unless there are changes in the process, key personnel, or office, the Plan will likely not change from year to year but should be redrafted every three years.

However, a Goals and Accomplishment report should change yearly. It is designed to describe annual Title VI accomplishments, trainings, complaints and reviews. Additionally, the Goals and Accomplishment report should describe the goals and plans for the upcoming year.

# GOALS AND ACCOMPLISHMENT REPORTS

The Goals and Accomplishment report should include the following information:

- Number of Program Area Reviews conducted, results of the Reviews, actions taken or planned;
- Number and type (i.e., desk audit, On-site, both) of Sub-recipient compliance reviews conducted, results of reviews, Sub-recipient corrective actions planned (if applicable);
- Title VI-related training conducted both to LPA staff and to Sub-recipients, identify attendees, results of training;
- Include a summary, disposition and status report on any Title VI complaints filed with the ADOT/FHWA/USDOT/USDOJ.
- Identify any actions that have been, or will be taken to address identified discrimination in any Special Emphasis Program areas.

The Goals portion of this report should include the number of reviews planned for the next year (both Program Area Reviews and Sub-recipient reviews) and training sessions planned (both LPA staff and Sub-recipients) any other Title VI related activities the LPA anticipates for the upcoming year.

23 CFR 200.9(b)(10)&(3)

*\* ADOT does not recommend combining the Implementation Plan with the Goals and Accomplishment Report.*

# GENERAL REQUIREMENTS

## SUMMARY POINTS

- Signed Title VI Assurances.
- Identify a Title VI Program Coordinator.
- Signed Title VI Policy Statement naming the Title VI Program Coordinator.
- Provide an Organizational Chart, with relationship between the Title VI Program Coordinator and the head of the agency.
- Develop procedures for processing external discrimination complaints.
- Provide ADOT with an annual list of external discrimination complaints and lawsuits.



# GENERAL REQUIREMENTS

## SUMMARY POINTS Continued...

- Outline the roles and responsibilities of the Title VI Coordinator.
- Provide a Public Participation Plan.
- Provide a Limited English Proficiency Plan with a Four Factor Analysis **for each project.**
- Monitor consultants and contractors for Title VI compliance.
- Ensure that contracts contain ***at least*** appendix A & E of the Title VI Assurances in all Federal contracts.
- Where appropriate ensure all Federal contracts contain appendix B, C or D of the Title VI Assurances.
- Ensure nondiscrimination in the award of contracts.
- Create Data Collection Methods

# GENERAL REQUIREMENTS

## SUMMARY POINTS Continued...

- Ensure collected data is on an ongoing basis
- Ensure data is analyzed and evaluated for best practices
- Submit an annual report providing updates of Title VI progress, complaints, and data collected for monitoring Title VI compliance
- Submit an annual Title VI Implementation Plan discussing goals and objectives over a 3-year period
- Provide compliance enforcement procedures
- Provide Training and describe when agency members are trained in Title VI requirements (including procedures).
- Have a process for meeting Environmental Justice requirements.

# THANK YOU!

**Afriika McKinnon**

206 S. 17<sup>th</sup> Ave Rm 183

Phoenix, AZ 85007

Office: 602-712-8946

Email: [CivilRightsOffice@azdot.gov](mailto:CivilRightsOffice@azdot.gov)