



# Maricopa County

## Department of Transportation

# MCDOT Title VI Plan



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## Section One: Introduction

### A. Maricopa County

Maricopa County was established as a county on February 14, 1871 by the Legislative Assembly of the Territory of Arizona from parts of Yavapai and Pima Counties. Maricopa County was named in honor of the Xalychidom Piipaash people, who inhabited the area as early as 1775. The word “Maricopa” is derived from the Pima (a neighboring tribe) word for the Xalychidom Piipaash people. The County’s current geographical boundaries were set in 1881 and have not changed since.

The history of the county over the next 140 years was mostly marked by rapid population increase, driven initially by the mining, agriculture and livestock industries. Arizona achieved Statehood on February 14, 1912, providing greater integration of Arizona into the national infrastructure and further incentives to settle in Maricopa County. Then, as now, Maricopa County was already the most populated area within Arizona. Many of the significant population in-migrations in recent times have been spurred on by the low cost of living, economic growth, climate and easy access to other major metropolitan areas. As the population began to grow, so did the diversity of the economy and the population, as well as the reasons for further migration to the area. The climate, strong economy, educational opportunities, and beautiful desert environment are just a few of the reasons why Maricopa County continues to have one of the fastest growing populations in the United States.

Maricopa County is the nation’s fourth largest county in terms of population and has a population greater than 21 states. Twenty-five cities and towns are located in Maricopa County. Its largest city, Phoenix, is the County seat and State capital. Measuring 137 miles east to west and 102 miles north to south, Maricopa County covers 9,225 square miles, making it the 14th largest county in land area in the continental United States, and larger than seven states. With more than nine-thousand square miles it is larger than Connecticut, Delaware and Rhode Island combined. Individuals and corporations make up 30% of total land ownership, with the remainder publicly owned. The County is administered by a County Manager who reports to the five member Board of Supervisors elected by the public.

### B. Maricopa County Department of Transportation

The Maricopa County Department of Transportation (MCDOT) plans, designs, constructs, operates and maintains roadways within the County’s unincorporated areas. MCDOT is responsible for the operation and maintenance of approximately 2,500 miles of roadway, more than 80 bridges (16 of them more than 400 feet long) and more than 325 culvert crossings, more than 160 signalized intersections and nearly 35,000 traffic signs. MCDOT’s funding is primarily derived from the Arizona Highway User Revenue Fund (HURF), and other federal, state and local sources.

#### MCDOT MISSION

To provide transportation infrastructure and related services to the people within Maricopa County so they can live, conduct business and travel in a safe and clean environment.

#### MCDOT VISION

MCDOT performs in a collaborative, innovative, efficient and effective manner to deliver safe, cost-effective infrastructure that is responsive to our customers.





### **C. Maricopa County Department of Transportation (MCDOT) Title VI Plan**

In order to develop transportation projects, plans and programs that are responsive to the needs and priorities of Maricopa County's diverse population, it is essential to have a process in place that effectively engages the public, fully integrates their feedback, analyzes the benefits and burdens of various alternatives, and recommends the most equitable solutions. With an intentional focus, vulnerable populations are assured equal access to MCDOT's planning process and to the products of such planning. The MCDOT has developed a robust Title VI program, based substantially on the processes currently established by Maricopa Association of Governments (MAG) in its Title VI Plan. The goal of the MCDOT Title VI program is to ensure all people have a meaningful role in processes associated with the delivery of MCDOT projects. This program outlines the roles, method of administration, and analysis that supports equity in transportation projects, planning and programs.

MCDOT continues to reach out to people in all corners of the county to ensure processes at MCDOT reflect the voices and visions of our diverse population. Title VI activities are mandated by the federal government to ensure that people of all races, income levels, ages, and abilities have an equal voice in the planning and project delivery processes and receive equal benefit from the results of such planning. The Maricopa County Department of Transportation is actively engaged in Title VI activities as a sub-recipient of federal funding. In order to facilitate a thorough understanding of these activities, the definitions are provided in Attachment A.

The MCDOT's plan will be reviewed annually and updated as needed. The Title VI program will be developed no less than every three years in accordance with federal regulation. Federal guidance directing the content of MCDOT's Title VI program is described in the following section.

## Section Two: Overview of Roles

### A. Federal Guidance for Sub-recipients of Federal Funding

Title VI of the Civil Rights Act of 1964 is the overarching civil rights law that prohibits discrimination based on race, color, or national origin, in any program, service or activity that receives federal assistance. Specifically, Title VI assures 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 benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.” Title VI has been broadened and supplemented by related statutes, regulations and executive orders. Discrimination based on sex is prohibited by Section 324 of the Federal-Aid Highway Act, which is the enabling legislation of the Federal Highway Administration (FHWA). The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 prohibited unfair and inequitable treatment of persons as a result of projects that are undertaken with Federal financial assistance. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal-aid recipients and contractors whether those programs and activities are federally funded or not.

In addition to statutory authorities, Executive Order 12898, signed in February of 1994, requires federal agencies to identify certain disproportionately high and adverse effects of its programs, policies, and activities on minority populations and low-income populations. Such issues are addressed by involving the potentially affected public in the development of transportation projects that fit within their communities without sacrificing safety or mobility. In 1997, the U.S. Department of Transportation (USDOT) issued a corresponding DOT order to summarize and expand upon the requirements of Executive Order 12898. Also, Executive Order 13166 provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

As a recipient of federal financial assistance, the Maricopa County Department of Transportation (MCDOT) must provide access to individuals with limited ability to speak, write, or understand the English language. MCDOT will not restrict an individual in any way from the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under its programs or projects. Individuals may not be subjected to criteria or methods of administration which cause adverse impact because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program because of race, color or national origin. Therefore, based on federal guidance, the main components of the MCDOT Title VI Program include:

#### General Requirements

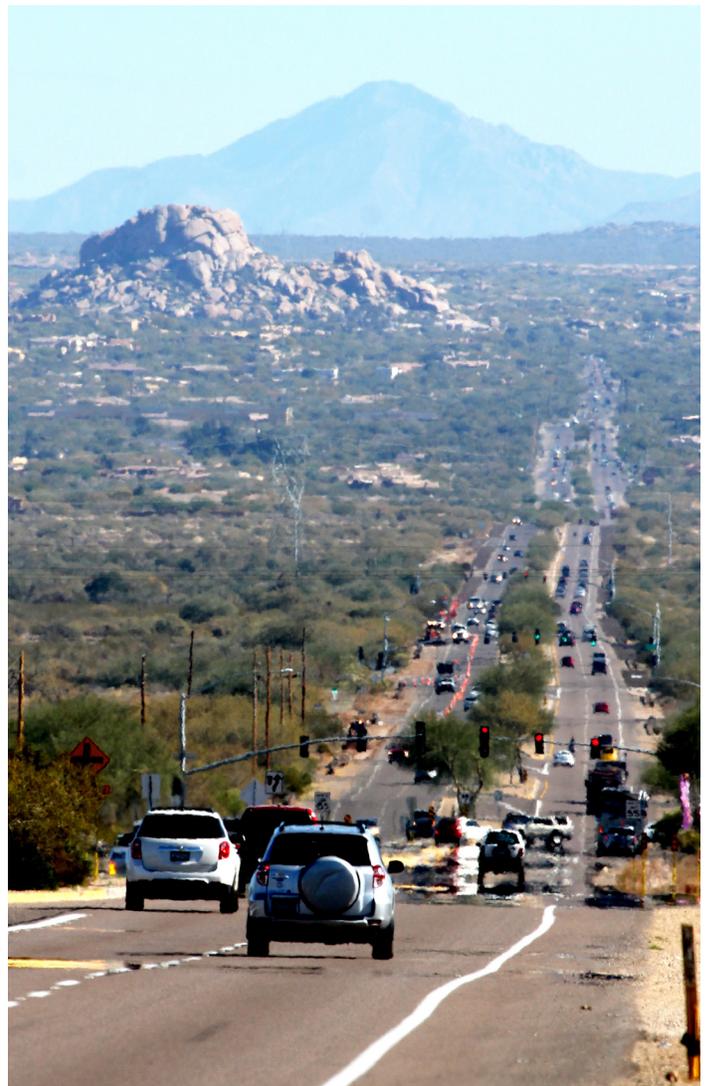
- Title VI Program that has been approved by the MCDOT Director.
- A copy of the agency’s public notice with a list of where the notice is posted.
- Instructions for how to file a complaint with a copy of the complaint form.
- A list of any Title VI investigations, complaints or lawsuits and how such complaints were addressed and resolved by MCDOT.
- A Public Participation Plan and list of outreach activities conducted since the last submission.
- A Limited English Proficiency Plan for providing language assistance.
- A table depicting the racial composition of transportation-related committees, boards and advisory councils.

## Section Two: Overview of Roles

MCDOT shall also ensure that their sub-recipients adhere to state and federal law and include in all written agreements or contracts, assurances that the sub-recipient must comply with Title VI and other related statutes. MCDOT, as a sub-recipient who distributes federal transportation funds, shall monitor their sub-recipients for voluntary compliance with Title VI. In the event that non-compliance is discovered, the County will make a good faith effort to ensure that the sub-recipient corrects any deficiencies arising out of complaints related to Title VI and that sub-recipients will proactively gauge the impacts of any program or activity on the traditionally underserved population that includes minority populations and low-income populations, the elderly, persons with disabilities, persons with Limited English Proficiency (LEP), all interested persons and affected Title VI populations.

MCDOT's efforts to prevent such discrimination must address, but not be limited to, a program's impacts, access, benefits, participation, treatment, services, contracting opportunities, training, investigation of complaints, allocation of funds, prioritization of projects, and the overarching functions of planning, project development and delivery, right-of-way, construction, and research.

MCDOT has developed this Title VI Plan to ensure that its services, programs, and activities are offered, conducted, and administered fairly, without regard to race, color, national origin, sex, age, or disability of the participants or beneficiaries of federally funded programs, services, or activities.  
(see Attachments: Title VI Assurances)



## B. Signed Policy Statement



### Maricopa County Department of Transportation

The following policy statement supports the implementation of these activities:

The Maricopa County Department of Transportation is committed to ensuring that no person is discriminated against on the grounds of color, race, or national origin as provided by Title VI of the Civil Rights Act of 1964 and related legislation. Specifically, Title VI asserts 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 subjected to discrimination under any program or activity receiving federal financial assistance." Additional protections are provided in other federal and state statutes for religion, sex, disability, and age.

The Maricopa County Department of Transportation strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. As a sub-recipient of federal funding, the Maricopa County Department of Transportation is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice under 28 Code of Federal Regulations (CFR) § 42.401 et seq. and 28 CFR § 50.3. The U.S. Department of Transportation Title VI implementing regulations can be found at 49 CFR part 21.

A handwritten signature in blue ink, appearing to read "J Toth", written over a horizontal line.

Jennifer Toth, P.E.  
Director  
Maricopa County Department of Transportation

A handwritten date "11/03/2014" in blue ink, written over a horizontal line.

Date

## Section Three: Method of Administration

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to Limited English Proficiency (LEP) persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The Language Assistance Plan outlined below is based on the federal guidance provided by U.S. DOT.

### A. Language Assistance Needs Assessment– Four Factor Analysis

This plan outlines how to identify a person who may require language assistance, the ways in which the Maricopa County Department of Transportation (MCDOT) provides such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis, as recommended by USDOT. The four factors are:

- Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by MCDOT services and programs.
- Factor 2:** The frequency with which LEP persons come into contact with MCDOT services and programs.
- Factor 3:** The nature and importance of MCDOT's services and programs in people's lives.
- Factor 4:** The resources available to MCDOT for LEP outreach, as well as, the costs associated with the outreach.

#### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by MCDOT services and programs**

An effective Language Assistance Plan is the preferred way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be addressed through the planning and project development process.

In order to ensure that all people can fully participate in this community engagement, the MCDOT addresses potential language barriers as described below.

### **Demographic Profiles for Communities of Concern**

Communities of concern describe populations that have been determined by the federal government as benefiting from protections to ensure their meaningful involvement in planning and services. These vulnerable populations have been identified through the Civil Rights Act of 1964, Executive Order 12898, and Executive Order 13166 to end discrimination and ensure equal access to all federally funded services.

To assist with the identification of Title VI neighborhoods, the presence of Title VI populations is compared against the regional average for each community of concern. Linguistic isolation follows federal guidance at five percent within a census block of 1,000 people or more within a neighborhood. Based on the 2008 to 2012 American Community Survey five-year estimates, the threshold for each mandated community of concern is as follows:

- Linguistic isolation: five percent or higher
- Minority population: 41 percent or higher
- Population in poverty: 14.7 percent or higher
- Disability: 18 percent or higher

Communities of concern are identified as those census tracts where the identified group represents a percentage of the population equal to or greater than that of the county average. Federal guidelines state that minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent, or (b) the minority population percentage of the affected area is measurably greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

The chart on the following page indicates the number of people represented by communities of concern and the percentage they represent of the total population in Maricopa County.

Maricopa County Population and Households		
Category	Total	Percent
Population Base (Defined Census Geography)	3,817,117	100.0%
Household Base (Defined Census Geography)	1,411,583	100.0%
Minority <sup>a</sup>	1,577,062	41.3%
Age 60-64 <sup>a</sup>	189,848	5.0%
Age 65-69 <sup>a</sup>	146,175	3.8%
Age 70+ <sup>a</sup>	316,466	8.3%
Below Poverty Level <sup>b</sup>	599,701	15.7%
Population With a Disability <sup>c</sup>	375,271	9.8%
Families with Female Head of Household <sup>d</sup>	175,551	12.4%
Linguistically Isolated Households <sup>e</sup>	76,265	5.4%
Speak English Less Than "Very Well" <sup>f</sup>	373,954	10.2%

**Sources:** U.S. Census Bureau, 2008-2012 American Community Survey (ACS)  
5-Year estimates and 2010 Decennial Census

*ACS data are based on a sample and are subject to sampling variability*

<sup>a</sup> Minority includes total population less White (Non Hispanic). Data for minority and population groups by age are from 2010 Census data.

<sup>b</sup> Percent of the population for whom poverty status is determined does not include institutionalized persons or persons under 5 years of age. Total population in the Census defined area for whom poverty status is determined is 4,008,079. Data from 2011 ACS 5-Year estimates (Table B17021).

<sup>c</sup> Disability status from the 2008-2012 ACS 5-year estimates. Disability status is not available at the Block Group level in the 2008-2012 ACS 5-year estimates or the 2010 Census. All percentages are based on Census geography for Maricopa County. Disability status is determined for the civilian non-institutionalized population based on six types of difficulty: hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty (Table B18135).

<sup>d</sup> Female Head of Household includes number of families with female householder, no husband present. Percent is a percent of total households. Data from 2010 Decennial Census (Table P0180006)

<sup>e</sup> A linguistically isolated household is one in which no member 14 years and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members of the household 14 years and over have at least some difficulty with English. Data from 2012 ACS 5-Year estimates (Table B16002). 2012 estimate of total households for the defined geography is 1,402,149

<sup>f</sup> The guidance for Limited English Proficiency (LEP) for DOT recipients refers to persons age five years and over who speak English less than "very well." See [http://www.lep.gov/guidance/guidance\\_Fed\\_Guidance.html](http://www.lep.gov/guidance/guidance_Fed_Guidance.html) Data from 2012 ACS 5-Year estimates (Table B16004). 2012 estimate of total persons age 5 years and over for the defined Census geography is 3,772,372.

*Minorities:*

In 1998, the Federal Highway Administration (FHWA) published actions to address impacts on minority populations and low-income populations. FHWA defined minority as the following:

- Black (having origins in any of the black racial groups of Africa).
- Hispanic (of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race).
- Asian American (having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands).
- American Indian and Alaskan Native (having origins in any of the original people of North America and who maintains cultural

identification through tribal affiliation or community recognition).

(In addition, the Maricopa Association of Governments (MAG), the region’s planning organization, includes the following groups as defined by the U.S. Census):

- Black or African American alone - not Hispanic or Latino.
- American Indian and Alaska Native alone - not Hispanic or Latino.
- Asian alone - not Hispanic or Latino.
- Native Hawaiian and Other Pacific Islander alone - not Hispanic or Latino.
- Some other race alone - not Hispanic or Latino.
- Persons of two or more races - not Hispanic or Latino.

Maricopa County Population by Race and Hispanic Origin		
Category	Total	Percent
<b>Total Population</b>	3,817,117	100.0%
<b>White alone, Not Hispanic or Latino</b>	2,240,055	58.7%
<b>Minority</b> (includes the groups listed below)	1,577,062	41.3%
Black or African American alone, Not Hispanic or Latino	177,490	4.6%
American Indian and Alaska Native alone, Not Hispanic or Latino	59,252	1.6%
Asian alone, Not Hispanic or Latino	128,301	3.3%
Native Hawaiian and Other Pacific Islander alone, Not Hispanic or Latino	6,723	0.2%
Some Other Race alone, Not Hispanic or Latino	5,508	0.1%
Two or More Races, Not Hispanic or Latino	71,047	1.9%
Hispanic or Latino	1,128,741	29.6%

**Source:** U.S. Census Bureau, 2010 Census, Table P5.

*Limited English Proficient (LEP) households:*

A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. An area is identified as LEP when five percent or more of the population, or 1,000 people within a neighborhood, fit this definition. The Census Bureau further defines

households as linguistically isolated when there are no members aged 14 years and over who speak only English or who speak a non-English language and speak English “very well.” In other words, all members of the household ages 14 years and over have at least some difficulty with English.

Maricopa County Households	Estimate	Percent	Percent of Linguistically Isolated Households
<b>Total Households</b>	1,424,393	100.0%	--
<b>English Speaking Only</b>	1,053,177	74.4%	--
Spanish Speaking	266,147	18.7%	--
Linguistically Isolated <sup>a</sup>	70,135	--	100.0%
Spanish	55,178	--	78.7%
Other Indo-European languages	5,478	--	7.8%
Asian and Pacific Island languages	6,924	--	9.9%
Other languages	2,555	--	3.6%

**Source:** U.S. Census Bureau, 2008-2012 American Community Survey (ACS) 5-Year estimates

*ACS data are based on a sample and are subject to sampling variability*

<sup>a</sup>A linguistically isolated household is one in which no member 14 years and over (1) speaks only English or (2) speaks a non-English language and speaks English “very well.” In other words, all members of the household 14 years and over have at least some difficulty with English. (Table B16002)

According to the 2008 to 2012 American Community Survey (ACS) five-year estimates, 26 percent of Maricopa County’s population speaks a language other than English. ACS reports that 10.2 percent of persons five years old and over speak English less than “very well.” The predominant language for this group is Spanish. If assessing one neighborhood, the standard is 1,000 or more within a neighborhood speak English less than “very well.” According to this standard, LEP neighborhoods are present throughout the county, especially in the central areas along I-17 and I-10 corridors.

As indicated in the following map, the latest Census data shows that there is a significant percentage of households that are linguistically isolated in Maricopa County. Linguistic isolation is defined as a household in which no member 14 years and over (1) speaks only English or (2) speaks a non-English language and speaks English “very well.” In other words, all members of the household 14 years and over have at least some difficulty with English.

*People with disabilities:*

Under the conceptual framework of disability described by the Institute of Medicine (IOM) and the International Classification of Functioning, Disability, and Health (ICF), disability is defined as the product of interactions among individuals' bodies; their physical, emotional, and mental health; and the physical and social environment in which they live, work, or play. Disability exists where this interaction results in limitations of activities and restrictions to

full participation at school, at work, at home, or in the community. The U.S. Census Bureau creates estimates of people with disabilities using results from the American Community Survey (ACS). Disability status is determined for the non-institutionalized population based on six types of difficulty: hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty.

Disability Status for Maricopa County	
	Estimate
Civilian Non-institutionalized Population	3,811,852
With a Disability	375,271
Percent With a Disability	9.8%

**Source:** U.S. Census Bureau, American Community Survey (ACS) 2008-2012, 5-year estimates  
 Disability status from the 2008-2012 ACS 5-year estimates. Disability status is not available at the Block Group level in the 2008-2012 ACS 5 year estimates or the 2010 Census. All percentages are based on Census Tracts only for Maricopa County. Disability status is determined for the civilian non-institutionalized population based on six types of difficulty: hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty.

*People with low incomes:*

Poverty status is determined by comparing annual income to a set of dollar values called thresholds, which vary by family size, number of children, and age of householder. If a family's before-tax income is less than the dollar value of their threshold, then that family and every individual in it are considered to be in poverty. For people not living in families, poverty status is determined by comparing the

individual's income to his or her threshold. The poverty thresholds are updated annually to allow for changes in the cost of living using the Consumer Price Index (CPI-U). They do not vary geographically. For more information, please refer to the following section, "How Poverty Is Calculated in the ACS," at <http://www.census.gov/hhes/www/poverty/about/overview/measure.html>.

Poverty Status for Maricopa County	
	Estimate
Population for Whom Poverty Status Is Determined	3,573,347
Population Below Poverty Level	448,128
Percent Below Poverty	12.5%

**Source:** U.S. Census Bureau, 2008-2012 American Community Survey (ACS) 5-Year estimates ACS data are based on a sample and are subject to sampling variability Table B17021

**Factor 2: The frequency with which LEP persons come into contact with MCDOT services and programs.**

Mapping software is typically used by MCDOT to find the aggregate amount of projects crossing census tracts with greater than average concentration of minority, low income, underserved and LEP populations. In terms of the LEP population, it was determined that the Maricopa County average is 10.2 percent. Several significant MCDOT projects cross census tracts with a greater than average linguistically isolated concentration.

*(see Attachment F - 2015 MCDOT Projects and Linguistically Isolated Households)*

Notices of public meetings held during the development and review of planning documents are placed in Spanish language media as appropriate. Staffing at these meetings normally includes at least one staff person who is able to speak in conversational Spanish, and more bilingual resources are committed to meetings in areas known to have a high proportion of Spanish speakers. Some MCDOT studies are region-wide and cater to the demographics discussed under Factor 1. However, more localized planning studies may affect communities with different demographics.

**Factor 3: The nature and importance of MCDOT services and programs in people's lives.**

An analysis of benefits and burdens is a critical component of the Title VI Plan. Staff analyzes the feedback reported by communities of concern to determine the potential benefits and burdens of a transportation project on the population. In addition, proposed transportation improvements, such as those in the MCDOT System Plan, are analyzed and documented to determine if the improvements impose a disproportionate burden on the communities of concern. This analysis, as well as the input from communities of concern, is incorporated as projects advance through the MCDOT committee process for approval. Feedback from Title VI populations will be used to assess any enhancements to the Title VI Plan on a biennial basis.



**MCDOT Process**

Title VI issues are communicated and considered as a project and planning activity moves through MCDOT's process. This generally originates at the staff (branch) technical level, proceeds through division and management level review and recommendation, and concludes with final approval or disapproval by the MCDOT Director and/or the Maricopa County Board of Supervisors. In this way, the concerns and community input that have been addressed throughout the planning of the activity and project development impact decisions in a meaningful way.

*Advisory Committees:* These groups may include County departmental representatives, liaisons from MAG, jurisdictional agencies (cities/towns/tribes), and other stakeholders as appropriate to the specific project or planning study.

*General Public:* This group includes residents throughout Maricopa County. This target group is included through Public Open Houses, social media, and other methods identified by the MCDOT Communications.

*Maricopa County Manager and Board of Supervisors:* The County is administered by a County Manager who reports to the five member Board of Supervisors elected by the public. The Board of Supervisors receives final drafts of key policies, procedures, plans and programs for adoption.

Transportation Advisory Board - Demographic breakdown by race and sex			
Female	0%	Male	100%
White	80%	Black or African American	0%
American Indian/Alaska Native	0%	Native Hawaiian/other Pacific Islander	0%
Asian	0%	Hispanic	0%
Other (One vacancy)	0%		

**Boards and Commissions**

*Transportation Advisory Board (TAB):*

The TAB is a citizen-led transportation committee that consists of five members appointed by the Board of Supervisors, one from each of Maricopa County’s supervisorial districts.

Among the TAB’s fundamental responsibilities are the review and approval of MCDOT Five-Year Transportation Improvement Program (TIP) and the Maricopa County Transportation System Plan (TSP). The TIP contains all projects planned by MCDOT during the upcoming five years, and the TSP establishes a framework for the future transportation

needs of Maricopa County residents, outlining a 30-year vision for the planning and construction of transportation facilities within unincorporated areas of Maricopa County.

Another important function of the TAB is to assist in developing and maintaining public understanding and support of MCDOT programs through active communication. TAB members bring the constituent voice to MCDOT transportation decisions. The board meets every other month, and Maricopa County residents are encouraged to attend.

**Factor 4: The resources available to MCDOT for LEP outreach, as well as the costs associated with the outreach.**

Resources to translate materials and interpret for individuals are available but finite. The investment is made to translate vital materials. MCDOT maintains a standing offer to translate additional materials into additional languages and provide alternative formats such as Braille or large print. MCDOT contracts with two interpretation firms to aid in the provision of these services and frequently enlists internal resources and staff who are bilingual and available to assist with interpretation. At a minimum, there is a bilingual staff member who can assist with interpretation at every public meeting as needed.

Additional materials and interpreters will be made available for areas with high concentrations of linguistically-isolated individuals. MCDOT public involvement staff have been trained to utilize bilingual staff when needing translation assistance. If fluency in the needed language is not found among MCDOT staff, assistance may be acquired through contracted services.

Currently, the Spanish population has a significant presence in the service area; therefore, a number of materials are created and translated in a format that is easily understood by this Spanish speaking population. MCDOT also offers language translation services for public meetings at no cost to the public, if the request is made 48 hours prior to the time of the scheduled meetings.

Collateral materials are created and translated for outreach and marketing purposes to include:

- Direct mailings
- News releases to local television, radio and print media
- Public notices, service explanations
- Spanish interpreters at public meetings
- Expand current use of social media strategies and technologies to reach affected population

**B. Analysis of Benefits and Burdens - Implementation of the Language Assistance Plan (LAP)**

Information gained from detailed analysis of affected communities will be considered when conducting planning activities for the Maricopa County Transportation System Plan (TSP) and for the Maricopa County Transportation Improvement Program (TIP).

Based on the data, staff will determine the presence of Title VI and affected communities as well as the potential to impact them through the planned activity or project. Appropriate outreach and analysis will be incorporated into all relevant activities from the beginning. The Title VI Coordinator may assist staff as needed in determining the potential impact of projects and planning activities on Title VI populations. The Coordinator will also provide training opportunities to ensure staff develops an understanding of Title VI issues and responsibilities.

MCDOT must analyze any major decision made regarding the county transportation system, particularly if there is any potential to negatively affect areas of high concentration of LEP population. Some of the on-going LAP implementation strategies include:

- Identifying the LEP individuals who need Language Assistance
- Implementing language assistance measures
- Providing staff training
- Ongoing implementation of public involvement program and activities
- Monitoring and updating the LAP



### **Identifying the LEP Individuals Who Need Language Assistance**

MCDOT will continue to monitor the language needs of the LEP individuals within its services area and will continue to do the following:

- Continue to monitor the languages and the customers' needs encountered by the front-line staff.
- Continue to monitor the American Community Survey One-Year Estimate published each year by the U.S. Census Bureau for changes in the LEP population.
- Closely monitor the Census data and ensure that the LAP is updated in a timely manner.

### **Language Assistance Measures**

MCDOT will continue to implement the current measures to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:

- Continue to provide for interpreters as needed, in Spanish and any other language requested in accordance with Title VI guidelines.
- Maintain regular communication with front line public involvement staff regarding their experience with the LEP clients in order to assess the assistance provided.
- Continue to translate important notices and major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population.
- Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

### **Staff Training**

MCDOT will ensure that staff is provided appropriate training in order to provide high level of customer service to the general population as well as the LEP population.

- All involved staff will be regularly trained for handling potential Title VI and LEP complaints.
- Staff with bilingual capabilities will be given special training related to language assistance and how to handle potential Title VI and LEP complaints.

- Continue to survey staff for their language skills and this staff resource utilized to provide conversation language assistance to MCDOT customers, as needed.

### **Public Involvement**

MCDOT will continue to implement its extensive and inclusive public outreach process as detailed in its MCDOT Public Participation Plan (Attachment B – Public Participation Plan).

- Continue to monitor the effectiveness of the current process via feedback received from the public as well as certain targeted surveys.
- Update the Public Participation Plan as needed.
- Explore new and innovative techniques and strategies to engage the public in transportation projects and planning.

### **Monitoring and Updating the LAP**

MCDOT will continue to update the LAP as required by the USDOT and as the characteristics of the population changes. Updates will be made as necessary and may include, but not be limited to:

- Changes in LEP population by number or area as new information is made available.
- Updated analysis of the current LEP service area.
- Requirements for addition language translation services.
- Updates to policies and procedures, if such guidance is directed by the Maricopa County Board of Supervisors.

### **Notice to LEP Persons**

Any person requesting language assistance should contact:

Theresa Jones

*Title VI Coordinator*

Maricopa County Department of Transportation

2901 W. Durango Street

Phoenix, AZ 85009

(602) 506-1630 (phone)

(602) 506-4882 (fax)

[theresajones@mail.maricopa.gov](mailto:theresajones@mail.maricopa.gov)

## i. Complaint Procedure

The intent of MCDOT's Title VI work is to preclude discrimination and ensure all people have a voice in the planning process. If someone perceives they have suffered from discrimination, they are encouraged to address the matter with the Title VI Coordinator. According to 49 CFR Section 21.9(b), complaints may be filed if the matter cannot be resolved. In such cases, the following steps may be followed:

1. Within 180 days of the alleged infraction, complainants will submit to the Title VI Coordinator a complaint in writing or verbally with the complainant's name, race, ethnicity, national origin, sex, the nature of the complaint, the dates of the complaint, requested action, and contact information. Complaints received verbally will be documented in writing by staff. A log will be kept of each complaint, to include the name and address of person who filed the complaint and the date, basis, status and the final judgment of the complaint. Complaint forms are available online in English and Spanish at the MCDOT website at <http://www.mcdot.maricopa.gov>.
2. The Title VI Coordinator and MCDOT Planning Department Intergovernmental Manager will review the complaint and determine its jurisdiction and need for additional information.
3. Additional information will be solicited from the complainant as needed. If additional information is requested and not received within 15 business days, the case may be administratively closed. The case also may be closed if the complainant no longer wishes to pursue their case.
4. A complaint log will be kept by MCDOT containing the name and address of the complainant, nature of the complaint, date of submission and results of the investigation.
5. If the complaint is outside the jurisdiction of MCDOT, MCDOT will notify the complainant by certified letter, including the name and contact information for the appropriate agency with jurisdiction, if applicable.
6. If the complaint falls within the jurisdiction of MCDOT, it will be handled within a maximum of 60 days of receipt depending on the nature of the complaint and complexity of investigation.
7. MCDOT will send a certified letter notifying the complainant that a preliminary inquiry is underway to determine the need for an investigation.
8. If the preliminary inquiry by MCDOT indicates that an investigation is warranted, then the complainant will be notified and scheduled to offer their statement.
9. If the preliminary inquiry indicates an investigation is not warranted, a certified letter will be sent to the complainant with the reasons why and factors considered.
10. MCDOT will conduct an investigation. The results of the investigation will be provided to the MCDOT Director of Transportation for review. The investigation results will be reviewed and returned within 10 business days.
11. A complaint disposition letter will be sent by certified mail notifying the complainant that their concerns have been investigated and appropriate action has been taken. If it has been determined there was not a Title VI violation the case will be closed. A letter of finding will be sent if the allegations are substantiated, which will include a timeline to offer redress.
12. The result of the preliminary inquiry or investigation will be sent to ADOT's civil rights officer (through the designated recipient).
13. Records and investigative files will be kept for three years.

## ii. Title VI Coordinator and Liaison Descriptions

*Title VI Coordinator:* Under the supervision of the MCDOT Planning Department Intergovernmental Manager, the Coordinator is responsible for the overall administration of the Title VI Plan.

This includes the following:

- Integrate data and feedback received from the liaisons into the Title VI Plan.
- Maintain complaint database, to include information name and address of person who filed the complaint, the date, basis, status and final judgment of the complaint.
- Oversee responses to complaints and ensure issues are resolved.
- Review the plan on a biennial basis and update the plan as needed, but at least every three years.
- Communicate significant Title VI issues or complaints to the Director of Transportation and a resolution to any such issues or complaints.
- Receive periodic training related to Title VI and update liaisons and key staff as needed.
- Collect and analyze data related to the communities of concern as they pertain to demographics and geographic characteristics. Collaborate with the Planning Division to collect and analyze data related to Title VI transportation needs. These data will be provided to the Title VI Coordinator for inclusion in the plan updates.
- Develop and update maps indicating the residency locations of the communities of concern.

*Title VI Communications Liaison:* The MCDOT Public Participation Plan (PPP) is available in Attachment B. The PPP applies to all populations and is an integral part of the MCDOT planning process. Activities specific to Title VI are as follows:

- Ensure communications and public involvement efforts assist the agency in complying with Title VI and encourage input from Title VI communities of concern.
- Develop and distribute information on Title VI and agency programs to the general public.
- Maintain a list of staff members and external sources who can provide translation and interpreter services.
- Advertise the availability of translation and interpreter services to the public in all materials. Connect bilingual staff with members of the public needing assistance.
- Maintain a mail list of Title VI stakeholders, including nonprofit agencies, community organizations, faith-based groups, and advocates.
- Disseminate information to the Title VI stakeholders and minority media to help ensure all social, economic, and ethnic interest groups in the region are represented in the planning process.
- Include the abbreviated Title VI Notice to the Public on the agency website.
- Notify affected, protected groups of public hearings regarding proposed actions, and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a need for their use has been identified.
- Biennially assess and improve the strategies and resources available to assist people with Limited English Proficiency (LEP) to ensure they are able to access and understand MCDOT materials, fully participate in the planning process, and that their feedback is understood and considered by policy makers.
- Routinely conduct surveys evaluating the level of awareness and participation in MCDOT activities. Report the results on a biennial basis.
- Identify and respond to the transportation needs, benefits, and burdens of Title VI communities of concern through public interaction and tools such as focus groups and surveys.

*Title VI Program Liaisons:* Liaisons representing planning, project management, environmental planning, human resources, construction, government relations and traffic management are responsible for the following:

- Ensure elements of their respective projects/ programs comply with Title VI.
- Notify the Title VI Coordinator of any unresolved Title VI related issues and complaints.
- Analyze the impacts of activities on protected Title VI groups and determine if there will be burdens, or a disproportionately high and adverse impact, and/or benefits to the Title VI communities of concern.
- Report Title VI data analysis and community feedback to the MCDOT Title VI Coordinator and document the impact. (The Title VI Coordinator is responsible for reporting the impact to the relevant community of concern as needed.)
- Participate in Title VI training as needed.

*Title VI Contracts Liaison:*

- Ensure contracts and procurement comply with Title VI.
- Include Title VI language in all contracts as specified in Attachment E.
- Include Title VI language in public postings for Request for Proposals and Request for Qualifications.
- Comply with the Disadvantaged Business Enterprise requirements specified in the contract with the Arizona Department of Transportation.
- Participate in Title VI training as needed.



### iii. Title VI Complaint Form



**Maricopa County**  
Department of Transportation

#### 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:

**MCDOT Title VI Program**

Theresa Jones  
Title VI Program Coordinator  
2901 W. Durango Street  
Phoenix, AZ 85009  
Phone: 602.506.1630 | Fax: 602.506.4882

[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)

## Section Four: Conclusion

The goal of this plan is to document and enhance opportunities for Title VI populations to have a meaningful voice, to receive equal benefits from MCDOT activities without shouldering a disproportionate share of burdens. The plan itself is considered a work in progress that will evolve as people's needs and participation in the process change.

For more information, please contact the Title VI Coordinator at (602) 506-4178. Thank you for your support of MCDOT's efforts throughout Maricopa County.

## Section Five: Attachments

### A. Definitions and Background

*Arizona Department of Transportation (ADOT):* A multimodal transportation agency serving the state of Arizona. ADOT is responsible for planning, building and operating a complex highway system in addition to building and maintaining bridges and the Grand Canyon Airport. A major component of the organization is the Motor Vehicle Division, which provides title, registration and driver license services to the general public throughout the state of Arizona. ADOT is the designated recipient for Section 5310 funds for the rural and small urban areas outside of the Phoenix/Mesa Urbanized boundaries of the region.

*Communities of Concern:* Federal legislation has identified vulnerable populations that receive protection to end discrimination and ensure equal access to all federally funded services. This includes the Civil Rights Act of 1964, Executive Order 12898, and Executive Order 13166. These mandated populations include minorities, people with low incomes, people with Limited English Proficiency (LEP), and people with disabilities.

*Justice Executive Order 12898:* In 1994, President Bill Clinton signed Executive Order 12898 which mandated equitable treatment of minorities and people with low incomes by requiring federal agencies and recipients of federal funding to identify, and address, as appropriate, certain disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low income populations.

*Limited English Proficiency:* In 2000, President Clinton signed Executive Order 13166, which mandated that people with limited English proficiency (LEP) have meaningful access to services. This requires federal agencies and recipients of federal funding to examine their services and establish guidance on how populations with limited English proficiency can access services, prepare a plan to overcome barriers, and ensure people with limited English proficiency have adequate opportunities for input. A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. A population is defined as LEP when five percent or more of the people living in a geographic area fit this definition.

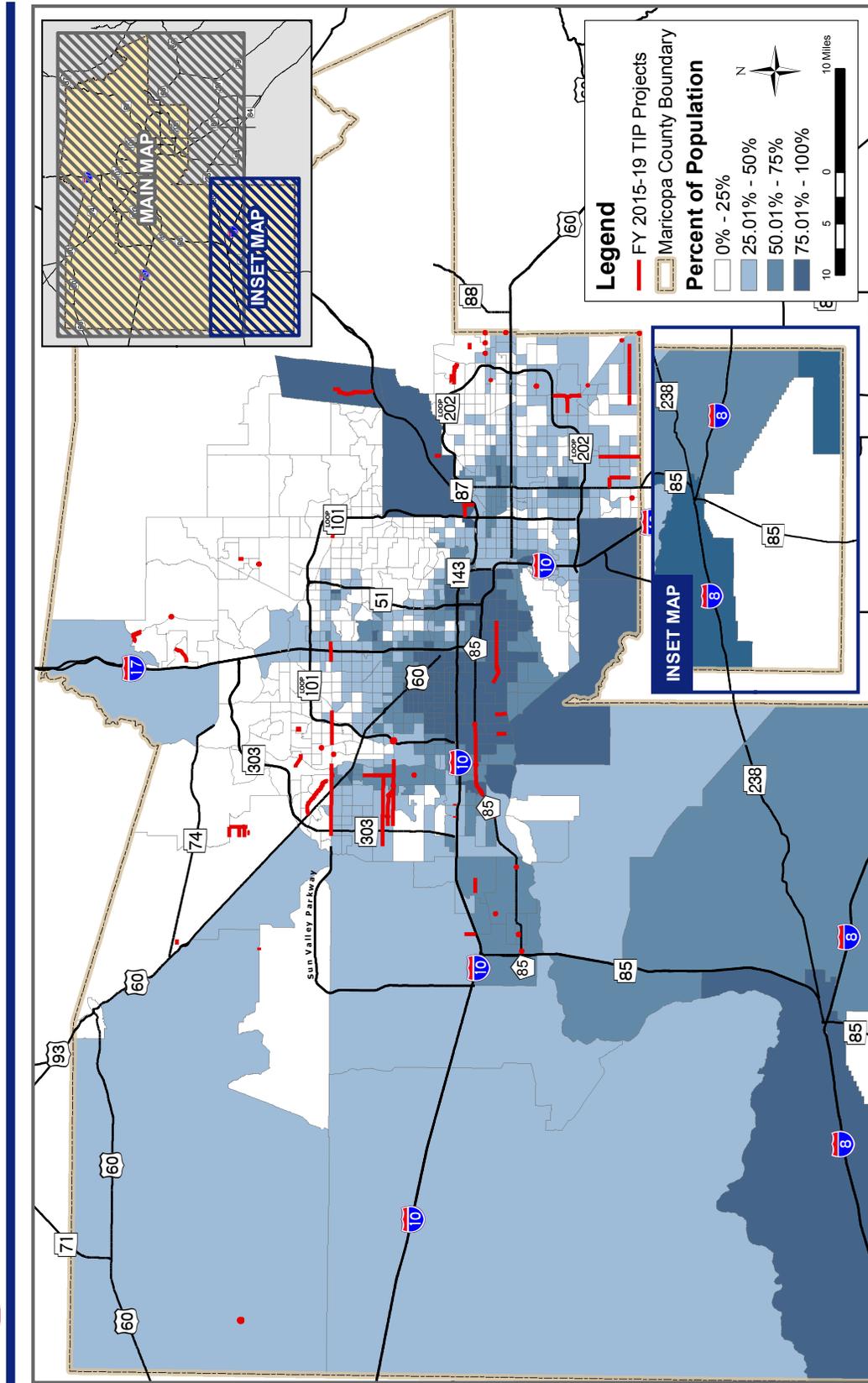
*Maricopa Association of Governments (MAG):* MAG serves the regional planning agency and Council of Governments for the metropolitan Phoenix area. When MAG was formed in 1967, the elected officials recognized the need for long-range planning and policy development on a regional scale. They realized that many issues such as transportation, air quality and human services affected residents beyond the borders of their individual jurisdictions. MAG is the designated metropolitan planning organization (MPO) for transportation planning in the Maricopa metropolitan region, including Maricopa County and portion of Pinal County. MAG has also been designated by the Governor to serve as the principal planning agency for the region in a number of other areas, including air quality, water quality and solid waste management. In addition, through an Executive Order from the Governor, MAG develops population estimates and projections for the region.

*Title VI:* The Civil Rights Act of 1964 is a comprehensive U.S. law intended to end discrimination based on race, color, religion, or national origin. It guarantees a number of protections, including nondiscrimination in the distribution of funds under federally assisted programs, or Title VI. Specifically, it states, "No person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance." (42 USC 2000d).

## B. Minority Population in Maricopa County



### Department of Transportation Minority Population



Source: 2010 Decennial Census, 2010 Census Tract Boundaries  
Maricopa County Department of Transportation, Planning Division, 9/4/2014

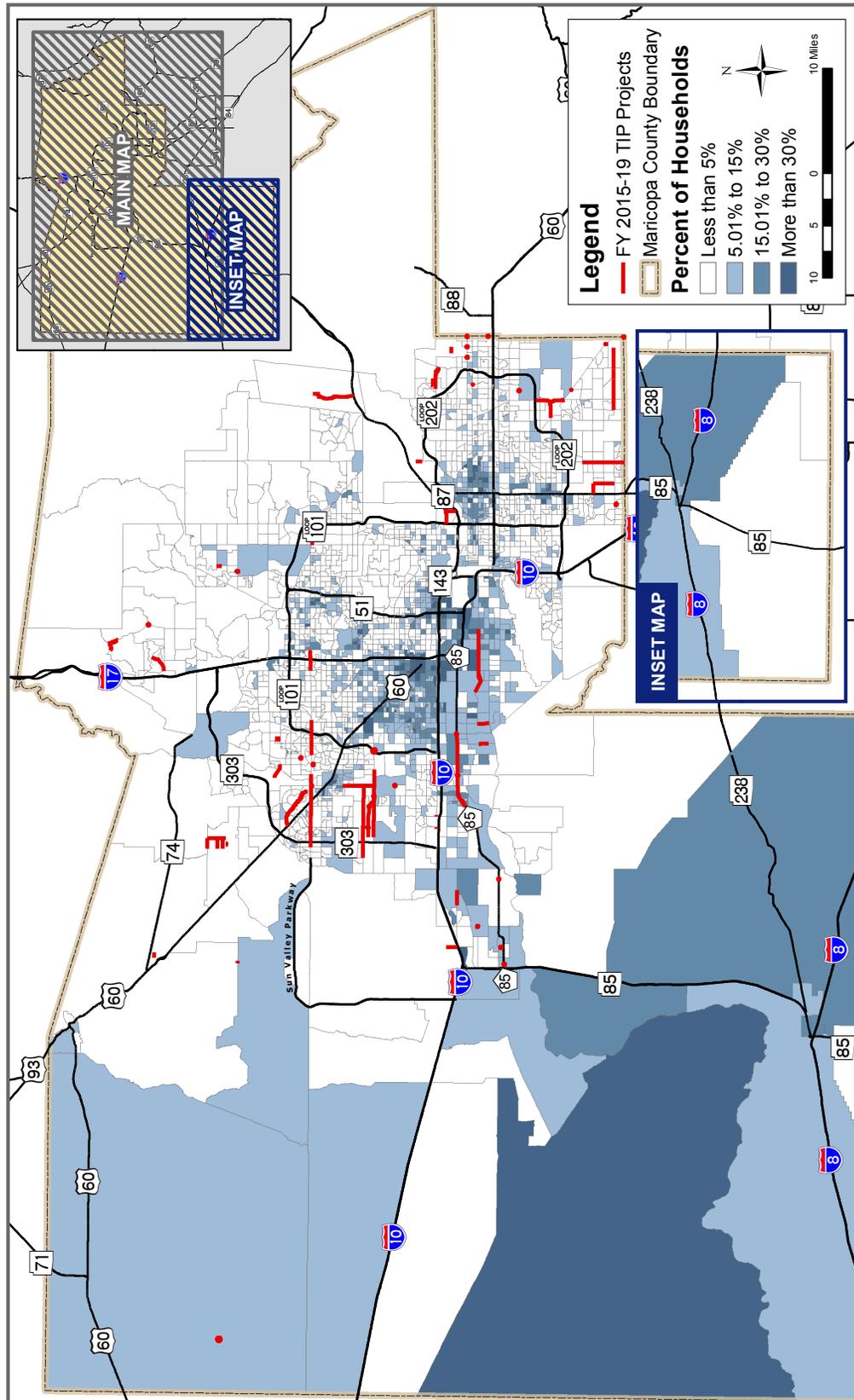
2901 West Durango Street, Phoenix, Arizona 85009, (602) 506-8600

[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)

### C. Linguistically Isolated Households in Maricopa County



## Department of Transportation Linguistically Isolated Households



Source: 2008-2012 ACS 5-year Estimates, 2010 Census Tract Boundaries  
 Maricopa County Department of Transportation, Planning Division, 9/4/2014

2901 West Durango Street, Phoenix, Arizona 85009, (602) 506-8600

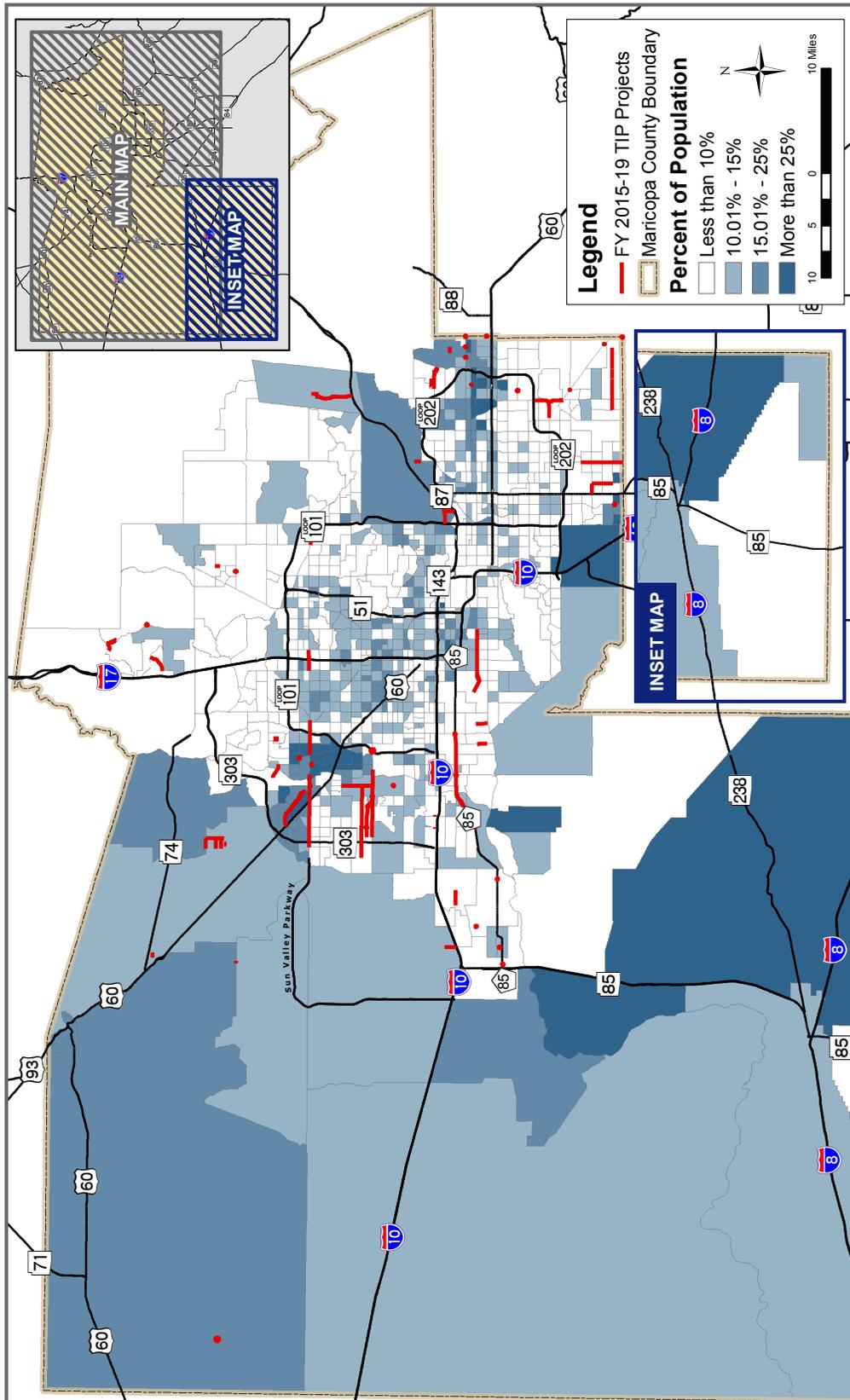
[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)

### D. Persons with Disabilities in Maricopa County



Department of Transportation

## Civilian Noninstitutionalized Population with a Disability



Source: 2008-2012 ACS 5-year Estimates, 2010 Census Tract Boundaries

Maricopa County Department of Transportation, Planning Division, 9/9/2014

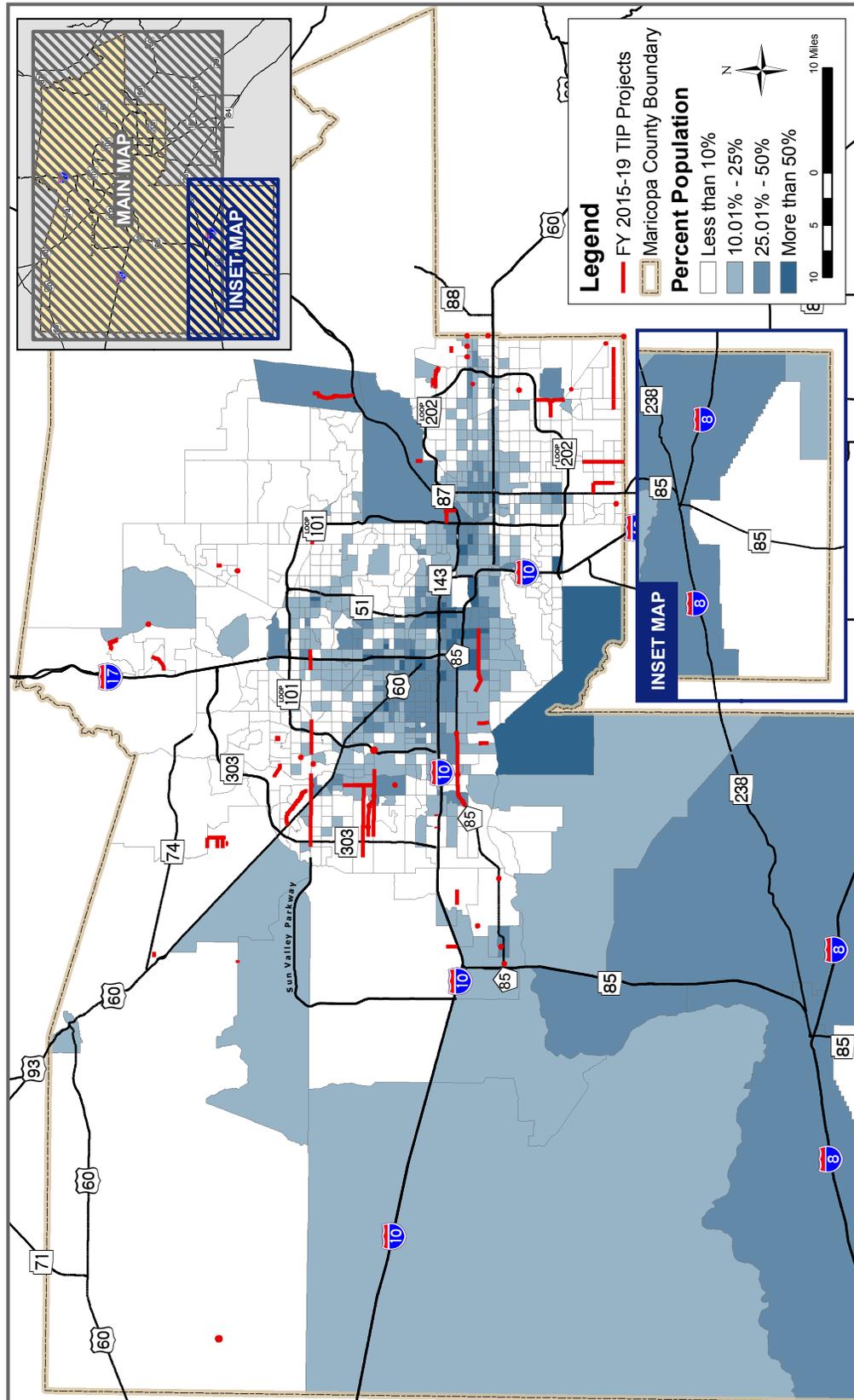
2901 West Durango Street, Phoenix, Arizona 85009, (602) 506-8600

[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)

### E. Persons with Income Below the Federal Poverty Level in Maricopa County



Department of Transportation  
**Population in Poverty**



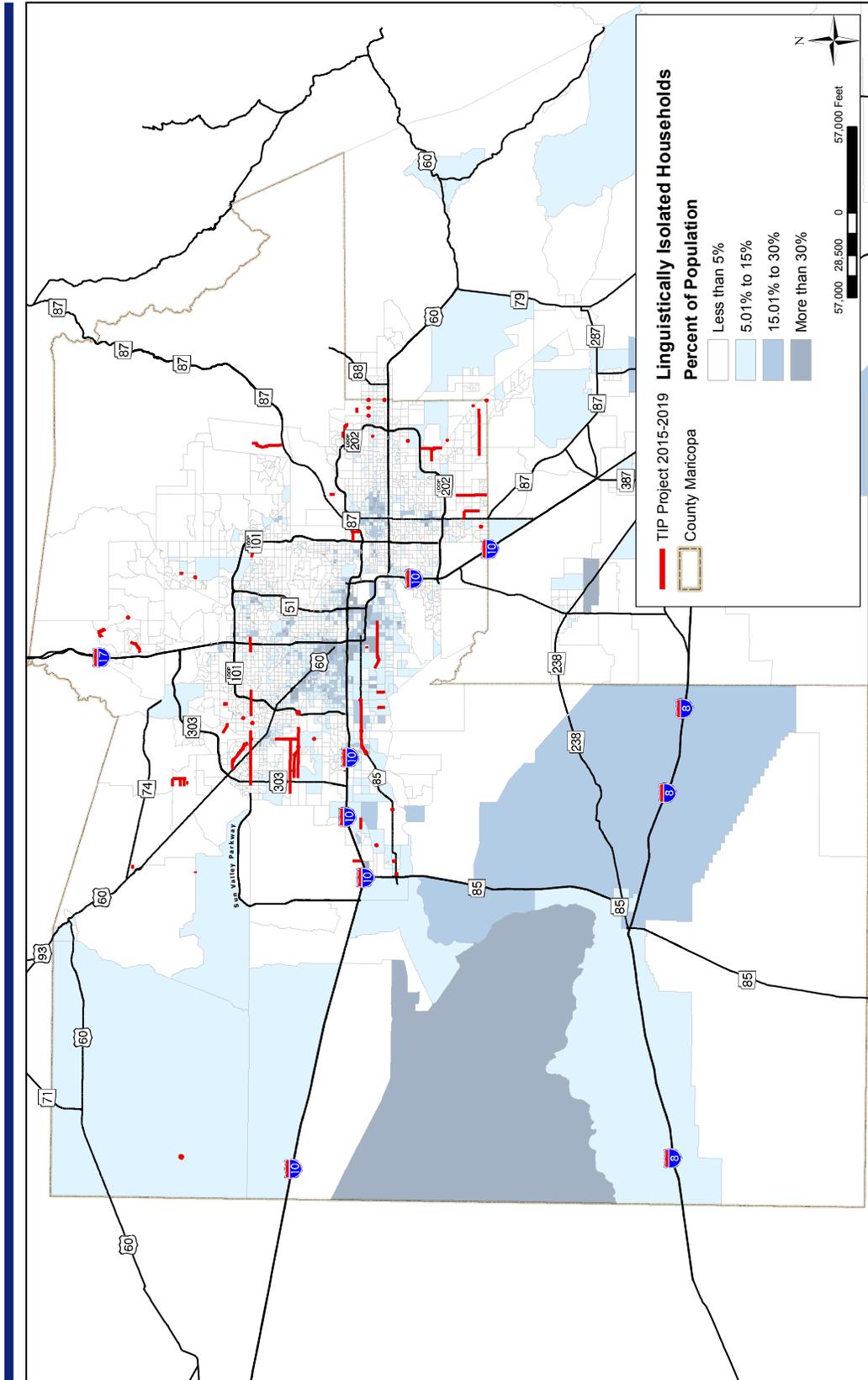
Source: 2008-2012 ACS 5-year Estimates, 2010 Census Tract Boundaries  
 Maricopa County Department of Transportation, Planning Division, 9/4/2014

2901 West Durango Street, Phoenix, Arizona 85009, (602) 506-8600

[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)

F. 2015 MCDOT Projects and Linguistically Isolated Households

Department of Transportation  
**Transportation Improvement Program**



Maricopa County Public Works, GIS Division, 7/14/2014  
[www.mcdot.maricopa.gov](http://www.mcdot.maricopa.gov)  
 2901 West Durango Street, Phoenix, Arizona 85009, (602) 506-8600

## G. Public Participation Plan

**Maricopa County  
Department of  
Transportation**

# **PUBLIC PARTICIPATION PLAN**

Maricopa County  
Supervisory  
Districts  
1, 2, 3, 4 & 5

Prepared by  
MCDOT  
Communications



### **Introduction**

Maricopa County Department of Transportation's (MCDOT) public, businesses and customer constituency need and deserve open, ongoing communication and input on transportation projects that affect their homes, businesses, livelihood, community and overall quality of life. Public information management is a significant component of public transportation projects and of vital importance to MCDOT. Public involvement, information planning, and the well-organized execution of this Public Participation Plan ensures two-way dialogue between affected individuals, businesses, organizations and MCDOT, as well as coordination with affected local, state and federal agencies and jurisdictions.

### **Public Participation Process**

MCDOT conducts extensive public outreach and seeks public input for all major projects that the agency is responsible for, such as the Transportation System Plan Update, MCDOT's long-range transportation plan. The public participation process ensures that all major stakeholders including county residents in both unincorporated and incorporated areas of the County, and various and targeted stakeholder groups are well informed and able to communicate to staff through a robust plan. MCDOT also ensures that the public participation plan is in compliance with its Title VI Plan.

#### *Public Participation Meeting Goals:*

- Encourage active public participation in project development.
- Disseminate study information, purpose and goals.
- Provide opportunity for open dialogue with concerned and/or affected stakeholders.
- Identify and integrate project stakeholder-defined measures that add value.
- Identify and mitigate, minimize or avoid features or components that stakeholders feel may have negative effect or impact on the community.
- Initiate and promote good will among stakeholders and MCDOT.

### **Stakeholder Identification**

Depending on the types of projects, stakeholder identification may include using a multi-tiered approach; implementation of this Public Participation Plan incorporates ongoing outreach, coordination and communication targeting the following groups:

#### **Public**

*General Public:* This group includes property owners, residents and businesses throughout Maricopa County and Title VI populations.

*Special Interest Groups:* This group may include builders, wildlife groups, Sonoran Institute, home owners associations, etc.

#### **Committees**

*Technical Advisory Committee (TAC):* This group includes County Departmental and MAG representatives.

*Stakeholder Advisory Committee (SAC):* This group includes Jurisdictional Agencies (cities/towns/tribes) as well as the TAC members. This group also includes, but is not limited to: impacted utilities, Arizona Game and Fish Department, Arizona State Lands, and Maricopa County Farm Bureau.

#### **Boards and Commissions**

*MCDOT Transportation Advisory Board (TAB):* Written progress reports will be given to the TAB at regular meetings throughout the process. Presentations will be given at key project milestones.

*Maricopa County Board of Supervisors:* Presentation of the Draft Final TSP Update will be presented to the Board of Supervisors for adoption.

MCDOT practices an extensive public outreach process and formally consults with appropriate federal, state and local governments and agencies that it regularly partners with in transportation projects and planning studies. Similarly, the County consults with public and private utility companies, major developers and other groups, entities or individuals affected by the project, to define their issues of concern and minimize, mitigate or avoid adverse impacts. The MCDOT Communications will compile a database of key stakeholders to include government agencies, public interest groups and major utilities to seek their input. Stakeholders receive newsletters, public meeting notifications and other appropriate information throughout the transportation project process. Stakeholders may include, but are not limited to, the following:

- Maricopa County Department of Transportation (MCDOT)
- Arizona Department of Transportation (ADOT)
- Maricopa Association of Governments (MAG)
- Flood Control District of Maricopa County (FCDMC)
- U.S. Army Corp of Engineers
- U.S. Bureau of Land Management
- Arizona State Land Department
- Maricopa County Parks and Recreation
- Maricopa County Planning and Zoning
- Impacted Utility Companies
- Maricopa County Board of Supervisors
- Maricopa County Transportation Advisory Board
- Residents, businesses and property owners
- Maricopa County cities and towns
- Valley Metro
- Native American communities
- Adjacent counties
- Private providers of transportation services
- Development communities
- U.S. Forest Service
- Bureau of Land Management
- Luke Air Force Base
- Railroads
- Maricopa County Trail Commission
- Maricopa County school districts, community colleges and universities
- Traditionally underserved populations

## **Title VI Population Stakeholders**

Public Participation Plan activities specific to MCDOT's Title VI Plan are as follows:

- Ensure communications and public involvement efforts assist the agency in complying with Title VI and encourage input from Title VI communities of concern.
- Develop and distribute information on Title VI and agency programs to the general public.
- Provide translation and interpreter services in accordance with MCDOT's Title VI Plan.
- Advertise the availability of translation and interpreter services to the public in all materials.
- Connect bilingual staff with members of the public needing assistance.
- Develop and maintain a mail list of Title VI stakeholders, including nonprofit agencies, community organizations, faith-based groups, and advocates.
- Disseminate information to the Title VI stakeholders and minority media to help ensure all social, economic, and ethnic interest groups in the region are represented in project development process.
- Include abbreviated Title VI Notice to the public on the agency website.
- Notify affected, protected groups of public meetings regarding proposed actions, and make the public meetings accessible to all residents. This includes the use of interpreters when requested, or when a need for their use has been identified.
- Continually assess and improve the strategies and resources available to assist people with Limited English Proficiency (LEP) to ensure they are able to access and understand MCDOT materials, to fully participate in the project development process, and that their feedback is understood and considered by policy makers.

### **Proposed Public Input Meeting Schedule**

Multiple public input meetings will be conducted throughout Maricopa County during the project development process. The public participation process is evaluated based on the type of project to determine the type, number and location of public involvement measures warranted. In some instances, alternatives may be limited, and in others, additional issues may arise during the course of the project that may result in modifying public outreach measures based on the participation and interests generated by our impacted public.

Accommodations for individuals with disabilities, seniors with disabilities and individuals with Limited English Proficiency (LEP) and alternative format materials, translation services in other languages, sign language interpretation, and assertive listening devices are available upon 72-hours advance notice through Maricopa County Department of Transportation Communications. To the extent possible, additional reasonable accommodations will be made available within time constraints of the request.

### **Public Notification**

MCDOT Communications shall notify all identified interested parties regarding public information meetings 10-14 days prior to the meeting. This shall be accomplished through the undertaking of several activities. Paid advertising, e-mail notifications, news releases, direct mailings, and website postings may be used during project development to notify affected stakeholders of public input opportunities and project updates.

### **Advertising**

Public meeting advertisement display ads will be placed with local geographically targeted local and regional newspapers:

- Arizona Republic
- East Valley Tribune
- San Tan Monthly
- Ocotillo News
- Daily News Sun
- Peoria Times
- Glendale Star
- Independent newspapers
- West Valley View
- Buckeye Valley news
- Sonoran News
- Anthem In and Out
- Foothills Focus
- Canyon Country News
- Surprise Today
- Independent Newspapers
- Foothills Sentinel
- Fountain Hills Times
- Tonopah Tribune
- West Valley View
- Sun Lakes Splash

### *Additional Publications:*

- MCDOT Interactive Website
- MCDOT website posting
- MCDOT Social Media: Facebook, Twitter
- Dissemination of flyers via targeted groups, organizations or associations
- Other Agency/Organization websites and mediums

**Follow Up**

Communication is important to the successful implementation of any public involvement effort. During the project process, the MCDOT Project Manager shall maintain ongoing communication with stakeholders and MCDOT Communications. In addition, the MCDOT Project Manager and the Communications shall develop a follow-up communication plan in post-meeting sessions. Information shall be disseminated as involvement warrants or as needed to address specific public concerns and issues.

**Government Relations**

Communicating with local, county, state, and federal agencies will be an important part of the transportation project process. The Communications staff will coordinate with the MCDOT Transportation Planning staff to ensure consistent and timely communications. Project Team members will be maintaining regular communication and closely coordinating with TAC and SAC members including keeping records and responding to information requests or conducting follow-up meetings, as appropriate.

**Public Participation Plan Evaluation**

Public involvement is a dynamic process. The goal of this Plan is to obtain the highest quantity of accurate and comprehensive feedback from all affected stakeholders. Therefore, throughout the project, public involvement techniques will be assessed, evaluated and possibly revised. As a result, this public involvement and government relations plan may also be revised to reflect changes in the project, different audiences or target groups, and different communication methods in an effort to maintain the intent and integrity of this Plan.

**Conclusion**

Development and implementation of this Plan is a comprehensive, all-inclusive process that is in concert with all other individual public participation plans developed and implemented by MCDOT Communications. It is recommended that the development of future projects build upon the public participation program established in this Plan and continue as a comprehensive public involvement program progression.



## H. Title VI Public Posting - Full and Abbreviated

According to FTA C 4702.1B, sub-recipients of federal funding must post notices informing the public of the agency's Title VI obligations and of the protections afforded to the public through Title VI. The following text will appear in all significant publications of the MCDOT and on the agency's website. The full text will be used when space is available. The abbreviated text will be used when space is limited. The public notice is posted on the MCDOT website and on the bulletin board on the third floor of the MCDOT office where all public meeting notices are posted.

### Full Title VI Notice to the Public

The Maricopa County Department of Transportation (MCDOT) 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 MCDOT 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 MCDOT Title VI Program Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from MCDOT by contacting:

Theresa Jones  
Title VI Coordinator  
Maricopa County Department of Transportation  
2901 W. Durango Street  
Phoenix, AZ 85009  
(602) 506-1630 (phone)  
(602) 506-4882 (fax)



**TITLE VI NOTICE TO THE PUBLIC**  
**AVISO AL PÚBLICO SOBRE EL TITULO VI**

Maricopa County Department of Transportation (MCDOT) hereby gives public notice that it is agency 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 participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which MCDOT receives federal financial assistance.

El Departamento de Transporte del Condado Maricopa (MCDOT) por el presente da aviso público que es la política de la Agencia asegurar conformidad total con el Título VI de la Ley de los Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987 y las leyes y regulaciones relacionadas en todos los programas y actividades. El Título VI requiere que ninguna persona será, por razón de raza, color, sexo, país de origen, edad o discapacidad, excluida de participar, negada los beneficios o de otra manera sujeta a discriminación bajo cualquier programa de Ayuda Federal para Carreteras u otra actividad por cual MCDOT recibe ayuda financiera federal.

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 MCDOT Title VI Program Coordinator within one-hundred-eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from MCDOT by contacting:

Cualquier persona que cree que se le ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito y presentada al Gerente del Programa de Título VI de MCDOT dentro de los ciento ochenta (180) días de la fecha en que se alega que la discriminación ocurrió. Se puede obtener formularios de reclamación de MCDOT poniéndose en contacto con:

**Theresa Jones**  
MCDOT Title VI Program Coordinator  
Maricopa County Department of Transportation  
2901 W. Durango St., Phoenix, AZ 85009  
theresajones@mail.maricopa.gov • 602.506.1630

[mcdot.maricopa.gov](http://mcdot.maricopa.gov)

### Abbreviated Title VI Notice to the Public

Maricopa County Department of Transportation (MCDOT) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information on rights afforded under Title VI, relevant activities at MCDOT, or if you feel these rights have been violated, please visit the agency website at <http://www.mcdot.maricopa.gov> or call (602) 506-4178.



**J. List of Investigations, Complaints, and Lawsuits 2014**

Complaint	MCDOT Action Taken
Complaint from Blue Diamond Contracting – a disadvantaged business enterprise – that Lawrence Construction was failing to pay. Initial claim of discrimination, which was subsequently retracted by Blue Diamond Contracting.	MCDOT and ADOT Business Engagement and Compliance Office (BECO) investigated the DBE complaint and found no Title VI concerns to warrant a further investigation by ADOT Civil Rights.

## K. Title VI Assurances

### Maricopa County Department of Transportation Title VI Assurances

The Maricopa County 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 and Arizona Department of Transportation, 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.

1. The Recipient agrees that each “activity,” “facility,” or “program,” as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an “activity”) facilitated, or will be (with regard to a “facility”) operated, or will be (with regard to a “program”) conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

“The Maricopa County Department of Transportation, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252.42 U.S.C. §§ 2000d-4) and the Regulations, hereby notifies all advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.”

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
  - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, Maricopa County Department of Transportation also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing Federal Highway Administration or Arizona Department of Transportation access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration or Arizona Department of Transportation. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, Arizona Department of Transportation, or its designee in timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

Maricopa County Department of Transportation gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration and Arizona Department of Transportation. This ASSURANCE is binding on Arizona, other recipients, subrecipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the Federal Aid Highway Program the person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

11/03/2014  
Dated

by   
Jennifer Toth, P.E.  
Director,  
Maricopa County Department of Transportation

Attachments  
Appendices A, B, C, D, E

## APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “contractor”) agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration or the Arizona Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Nondiscrimination:** The contractor, with regard to the work performance by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor’s obligations under this contract and the Acts and Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient, the Federal Highway Administration or Arizona Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient, the Federal Highway Administration, or Arizona Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor’s noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration or Arizona Department of Transportation, may determine to be appropriate, including, but not limited to:
  - a. withholding payments to the contractor under the contract until the contractor complies; and/or
  - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with request to any subcontract or procurement as the Recipient, the Federal Highway Administration, or Arizona Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

## APPENDIX B: CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4.

**NOW, THEREFORE**, the U.S. Department of Transportation as authorized by law and upon the condition that Maricopa County Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code the Regulations for the Administration of Federal Aid for Highways, and the policies and procedures prescribed by the Arizona Department of Transportation, Federal Highway Administration and the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252;42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Maricopa County Department of Transportation all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

### (HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto Maricopa County Department of Transportation and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the Maricopa County Department of Transportation, its successors and assigns.

The Maricopa County Department of Transportation, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its

successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [.] [and]\* (2) that the Maricopa County Department of Transportation will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, [and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].\*

*\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.*

## **APPENDIX C: CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM**

**The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Maricopa County Department of Transportation pursuant to the provisions of Assurance 7(a):**

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:
  - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities,
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, Maricopa County Department of Transportation will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.\*
- C. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, Maricopa County Department of Transportation will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Maricopa County Department of Transportation and its assigns\*.

*\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.*

## APPENDIX D: CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Maricopa County Department of Transportation pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, “as a covenant running with the land”) that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended set forth in this Assurance.
  
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, Maricopa County Department of Transportation will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.\*
  
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Maricopa County Department of Transportation will there upon revert to and vest in and become the absolute property of Maricopa County Department of Transportation and its assigns.\*

*\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.*

## APPENDIX E

**During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following nondiscrimination statutes and authorities; including but not limited to:**

### **Pertinent Non-Discrimination 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); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1687 et seq).

## L. Resources

The Maricopa County Department of Transportation  
<http://www.mcdot.maricopa.gov/about.htm>

Maricopa County's History – Maricopa County Open Books  
<http://www.maricopa.gov/OpenBooks/history.aspx>

Arizona Department of Transportation Local Public Agency Projects Manual  
<http://www.azdot.gov/docs/default-source/business/lpa-manual.pdf?sfvrsn=18>

Arizona Department of Transportation Title VI Assurances  
<http://www.azdot.gov/business/civil-rights/title-vi-nondiscrimination-program/title-vi-implementation>

Maricopa Association of Governments FY 2015 Title VI Plan  
[http://www.azmag.gov/Projects/Project.asp?CMSID=3881&MID=Human Services](http://www.azmag.gov/Projects/Project.asp?CMSID=3881&MID=Human+Services)

General Reporting Requirements for the RTC Transit Program Update Report and the Southern Nevada Metropolitan Transportation Planning Report under Title VI of the Civil Rights Act of 1964  
<http://www.rtcnv.com/about-the-rtc/legal-notice-title-vi/>

City of South Haven, MI - Title VI Nondiscrimination Plan  
[http://www.south-haven.com/pages/.../SH\\_Title\\_VI\\_Plan.pdf](http://www.south-haven.com/pages/.../SH_Title_VI_Plan.pdf)

Title VI Nondiscrimination in the Federal Aid Highway Program Desk Reference  
[http://ftp.dot.state.tx.us/pub/txdot-info/library/pubs/bus/env/env\\_justice/tvid\\_reference.pdf](http://ftp.dot.state.tx.us/pub/txdot-info/library/pubs/bus/env/env_justice/tvid_reference.pdf)

Civil Rights Title VI/Nondiscrimination Background and Purpose –  
U.S. Department of Transportation Federal Highway Administration  
[http://www.fhwa.dot.gov/federal-aid\\_essentials](http://www.fhwa.dot.gov/federal-aid_essentials)

FHWA regulations on implementing Title VI of the Civil Rights Act  
[http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title23/23cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title23/23cfr200_main_02.tpl)

U.S. DOT regulations on implementing Title VI of the Civil Rights Act  
[http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title49/49cfr21\\_main\\_02.tpl](http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title49/49cfr21_main_02.tpl)

Link to FHWA's Office of Civil Rights Web site with important program and background information  
<http://www.fhwa.dot.gov/civilrights/>

FHWA guidance on Title VI program implementation and non-discrimination  
<http://www.fhwa.dot.gov/civilrights/program/tvi/htm>

U.S. Department of Justice guidance on implementation of Title VI  
<http://www.justice.gov/crt/about/coord/vimanual.pdf>



# Maricopa County

Department of Transportation