



Title VI Annual Report

City of Tucson Department of Transportation

Title VI Nondiscrimination Accomplishment report for the Arizona Department of Transportation (ADOT) to be included in the Federal Highway Administration (FHWA) annual report. Federal Fiscal year 2017 (October 2016 – September 2017).

INTRODUCTION

The City of Tucson Department of Transportation (TDOT) complies with Title VI of the Civil Rights Act of 1964 and all related statutes and regulations. TDOT assures that no person on the grounds of race, color, national origin, sex, age or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of its programs and activities.

This report summarizes the implementation of TDOT Title VI plan and provides an overview of the goals for the upcoming year. More detailed information and examples can be found in TDOT's submitted Title VI plan and also on TDOT's website.

ACCOMPLISHMENTS

The City of Tucson Department of Transportation (TDOT) has continued to implement our Title VI plan in all aspects. With a Title VI coordinator in place since November 2014, TDOT has been able to effectively sustain or improve all program areas. Each of these topics is elaborated in their respective areas within this report.

- As part of the Certification Acceptance process, the Title VI plan was submitted to ADOT and approved in October 2015.
- No Title VI complaints have been filed against TDOT to date.
- Title VI Public Notices remain posted in public areas.
- 13 public meetings were held in which Title VI information was distributed.
- TDOT Public Summary Forms were collected for each of the 13 public meetings.
- Title VI TDOT training was created and facilitated by Diane Sotelo, Title VI Coordinator.
- TDOT website was updated to include all Title VI printed information, complaint procedures and complaint form in English and Spanish.
- The Self Identification Survey Cards were updated and printed with English on one side and Spanish on the other.
- TDOT continued an open line of communication with ADOT's Civil Rights Office and was timely in all requests from ADOT.
- On-site Title VI review was conducted on June 8, 2017 by the ADOT Civil Rights Office.

PLAN IMPLEMENTATION

Title VI, Public Participation and LEP Plans-

The current Title VI plan was updated and submitted along with this report on August 1, 2017. The content has remained structurally the same, with minor updates in outdated names, contact information, etc. TDOT Public Participation plan and Limited English Proficiency (LEP) plan which have been in place for a number of years and are included within the Title VI plan. The public participation plan provides for full and fair participation for all potentially affected communities and includes City of Tucson LEP Administrative Directive which ensures meaningful access to programs and services. These City Directives include translation of vital

documents and free interpretation services when requested. The LEP plan uses the 4-factor analysis during planning phase for each project. Primarily, TDOT uses Census data to determine the language needs of the community. In addition TDOT uses the demographic studies developed by the Pima Association of Governments (PAG).

PAG is the Metropolitan Planning Organization (MPO) for the greater Tucson region and coordinates the development of the regional Mobility and Accessibility plan and the Transportation Improvement Program (TIP) in coordination with the regional governments and PAG. As such, all transportation studies and plans are developed by the MPO. PAG's planning studies include Title VI, LEP and Environmental Justice considerations in all planning efforts.

The TDOT website continues to use the Google Translate option for instantaneous translation of our website into nearly 100 languages. The TDOT webpage was updated to include all Title VI printed information, complaint procedures and complaint form in English and Spanish. No Title VI complaints have been filed against TDOT to date. Title VI Public Notices remain posted in public areas and provide the complaint process and contact information. For each public meeting, there is a deliberate process that takes language and other factors into account. Mailings are made in English and Spanish where there is a high concentration of Spanish speakers. For all other mailings the phrase "For accommodations, materials in accessible formats, foreign language interpreters, and/or materials in a language other than English please contact Danny Morales at least 5 business days in advance of this scheduled event." Danny Morales is one of several bilingual employees who receive 2nd language pay as per the City of Tucson Administrative Directive. Project Managers and City of Tucson Employees are encouraged to use the "I Speak" Language Identification Flashcards.

Contract Administration-

The Title VI coordinator worked with the Procurement Department to provide the required language for all future contracts. TDOT continued to maintain an open line of communication with ADOT's Civil Rights Office and was timely in all requests from ADOT. TDOT continued to participate in the Arizona Peer group to share ideas and best practices regarding all Certification Acceptance activities. TDOT also adheres to all Certification Acceptance agency procedures which include use of Disadvantaged Business Enterprise (DBE) firms, compliance with Equal Employment Opportunity and all overarching Federal laws. TDOT has hired a Contract Compliance Officer and a Contract Specialist to improve our effectiveness in contractual obligations.

TRAINING & DEPARTMENT STRUCTURE

As part of the Certification Acceptance for FHWA, the Engineering Administrator, Fred Felix, has been providing bi-weekly training on the Construction Management Procedure Manual. Included in this training are all aspects of FHWA requirements including public involvement, contracts, budgets, data collection, planning and record retention. In May, the Title VI Public Self-Identification Survey Cards were updated and distributed to our public relations firms,

supervisor, administrators and project managers. Email reminders were sent out to ensure the correct public meeting protocol was followed along with the required Public Summary Form and Survey Cards. All information was updated via the TDOT intranet/internet and email reminders were sent out regularly along with announcements at monthly leadership meetings.

The Title VI Coordinator (Diane Sotelo), Transportation Program Coordinator (Karen Rahn) and Project Manager (Anna Steiner) all work closely with our Department Director and Deputy Directors on all aspects of our Department including monthly supervisor training, FHWA reports and public involvement. The Department Director and Deputy provide input prior to all trainings and meet frequently with Diane Sotelo who is in charge of coordinating training to gauge implementation expectations and alignment with our Department values: integrity, efficiency, civility, courtesy and respect.

PROGRAM REVIEW & DATA COLLECTION

Since the last report was submitted to ADOT on August 1, 2016 the City of Tucson Department of Transportation (TDOT) has hosted 13 public Meetings including: Bicycle Boulevard Master Plan, Broadway East, Pima Pedestrian Path, Silverbell Road, four ADA Transition Meetings, Broadway Improvement Project, Grant Road Phase 2, Bond Oversight Commission, ADA Transition Meeting and Glenn Street Neighborhood Improvement. The Title VI notification poster, self-identification survey cards and brochures in Spanish and English were made available at each meeting. Mailings inviting the public were printed with a statement and phone number should accommodations, translations, interpreters be needed. No requests for interpretation services were made. A few minor translation requests were handled through our bilingual staff and our Public Information office as well. Mailings were printed in both English and Spanish if the zip code met the threshold requirement as designated in our City of Tucson Limited English Proficiency Directive. Some announcements were made through social media. The TDOT Public Summary Form was collected for each of the 13 public meetings.

In total there were almost 600 community members in attendance at public meetings as determined by sign-in sheets. All public meetings are held in a publicly accessible location near the project site. Americans with Disabilities Act (ADA) requirements and public transportation routes are taken into consideration when scheduling meetings. The smallest meeting was Glenn Street Neighborhood Improvements with only 11 attendees. The largest meeting was on August 31, 2016, Broadway East, with 194 attendees. Of the 600 participants, only 20 self-identification survey cards were filled out and returned to staff. Of the 20 cards turned in, one indicated Asian/Pacific Islander, two Hispanic/Latino, 13 White and one Other. Of the 20 cards, six indicated Female, nine indicated Male.

We have updated our website, our posters and our brochures in order to be more visually appealing. We will begin seeking ideas for how to improve our outreach efforts and increase the number of Survey Cards that are returned to us. We will also work with our Public Relations Consulting groups to improve our outreach efforts, ensure we record participants

accurately via sign-in sheets and make better use of social media. Many of the larger projects make use of Kaneen or Gordley Public Relations consulting firms which allow us to leverage their resources and impact a greater stakeholder group. We have scheduled follow-up meetings with both firms to ensure they are using our internal guidelines and are aware of our expectations for public meetings.

GOALS FOR FISCAL YEAR 2018

As a result of our data collection and program review, the City of Tucson Department of Transportation's goals for 2018 include:

- Schedule training once a year in September for all internal staff responsible for Title VI compliance, including administrative staff. This training will be the initial training for new staff and refresher training for existing staff.
- Increase our outreach efforts to increase participation in public meetings particularly to minority groups.
- Improve the use of social media in our outreach efforts.
- Increase the number of self-identification survey cards returned at each public meeting.
- Provide translated documents in more instances.
- Monitor the use of the Public Meeting Form which acts as a checklist and data collection mechanism to ensure all Program Managers are consistently following the procedures.
- Create training on our internal "CityLearn" web portal for new employees and anyone who was not able to attend previous training.
- Document translations and requests for interpretations to improve Limited English Proficiency access.
- Develop a process to conduct reviews of pre-awards and post-awards of City contracts to ensure FHWA Title VI Assurance language is included.
- Develop a process to regularly collect and analyze FHWA Title VI demographic data from all internal program areas.
- Develop a process to identify community profiles and include techniques that incorporate face to face interactions with the public to proactively assess language access, EJ, and Title VI considerations.
- Continue to implement all stated components of existing Title VI plan.