



Title VI Annual Report

City of Tucson Department of Transportation & Mobility

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 2020 (October 2019- September 2020).

INTRODUCTION

The City of Tucson Department of Transportation & Mobility (DTM) complies with Title VI of the Civil Rights Act of 1964 and all related statutes and regulations. DTM assures that no person on the grounds of race, color, national origin, 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 DTM Title VI plan and provides an overview of the goals for the upcoming year. More detailed information and examples can be found in DTM's submitted Title VI plan and on DTM's website.

ACCOMPLISHMENTS

The City of Tucson Department of Transportation & Mobility (DTM) has continued to implement our Title VI plan in all aspects. DTM 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 on August 1, 2020
- No Title VI complaints have been filed against DTM to date.
- Title VI Public Notices remain posted in public areas.
- 10 public meetings were held in which Title VI information was distributed.
(Due to COVID-19 Pandemic all in person meetings have been put on hold and will be held virtually through Microsoft Teams)
- DTM Public Summary Forms were collected for each of the 10 public meetings.
- Title VI DTM training was created and facilitated by the current Title VI Coordinator via Microsoft Teams Virtual Meeting.
- DTM website was updated to include all Title VI printed information, complaint procedures and complaint form in English and Spanish. The contact information was updated.
- The Self Identification Survey Cards (printed with English on one side and Spanish on the other) were used at all public meetings.
- All front-line personnel at the Department of Transportation & Mobility, Park Tucson and Streets and Traffic Engineering were trained in the Language Line System.
- DTM continued an open line of communication with ADOT's Civil Rights Office and was timely in all requests from ADOT.

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, 2020. The content has remained structurally the same, with minor updates in outdated names, contact information, etc. DTM 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, DTM uses Census data to determine the language needs of the community. In addition, DTM 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 DTM website continues to use the Google Translate option for instantaneous translation of our website into nearly 100 languages. The DTM web page was updated to include new Title VI contact information, all Title VI printed information, complaint procedures and complaint form in English and Spanish. No Title VI complaints have been filed against DTM 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 Helen Wheeler at least 5 business days in advance of this scheduled event." Several bilingual employees 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

DTM continued to maintain an open line of communication with ADOT's Civil Rights Office and was timely in all requests from ADOT. DTM continued to participate in the Arizona Peer group to share ideas and best practices regarding all Certification Acceptance activities. DTM 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. DTM 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. 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 DTM intranet/internet and email reminders were sent out regularly along with announcements at monthly leadership meetings.

On June 16-20, 2019, the Title VI Coordinator (Jesse Soto) attended the ADA Symposium in Dallas, Texas, which covered the training on the Language Line System. Subsequent trainings have been postponed due to the COVID-19 pandemic, DTM intends to continue attending Language Line trainings once they are available and it is safe to attend in person.

On Tuesday, June 25, 2020, the Title VI Coordinator (Jesse Soto) and Administrative Assistant (Jozett Keena) both attended a virtual training titled "CRO Annual FHWA Title VI Training." Presented by ADOT Civil Rights Office with Joanna Lucero and her team.

On Friday, July 10, the Title VI Coordinator (Jesse Soto), hosted the Title VI Non-discrimination Training virtually through Microsoft Teams." The training was provided to the Tucson Department of Transportation & Mobility's Front-Line Customer Service Teams, and Administrative Assistants. A total of 4 staff attended.

The Title VI Coordinator (Jesse Soto), and Planning and Programming Administrator (Jennifer Toothaker) 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.

PROGRAM REVIEW & DATA COLLECTION

Since the last report was submitted to ADOT on August 1, 2019 the City of Tucson Department of Transportation & Mobility (DTM) has hosted 10 public Meetings including: Two (2) Bond Oversight Commission meetings, (2) 2018 Parks + Connection Bond Oversight Commission, two (2) 2017 Public Safety Tax Oversight Commission, South 12th Ave Complete Streets Project, (1) Houghton Corridor Meeting, (3) Move Tucson Meetings held in person and virtually using Microsoft Teams. 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 DTM Public Summary Form was collected for each of the 10 public meetings.

In total there were 606 community members in attendance at public meetings as determined By sign -in sheets. All public meetings are held in a publicly accessibly location near the project site. Americans with Disabilities Act (ADA) requirements and public transportation routes are taken into consideration when scheduling meetings. Of the 606 participants, only 13 self-identification survey cards were filled out and returned to staff. Of the 13 cards turned in, zero indicated American Indian, two Hispanic/Latino, zero African American and 11 White. Of the 13 cards, 6 indicated Female, 6 indicated Male and 1 chose not to disclose gender.

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 2020

As a result of our data collection and program review, the City of Tucson Department of Transportation & Mobility's goals for 2020 include:

- Schedule training once a year in October 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. Include a refresher on use of the Language Line System for all front-line personnel.
- Increase staff Title VI Training by attending virtual trainings or webinars.
- Increase our outreach efforts to increase participation in virtual public meetings particularly to minority groups.
- Improve our use of social media through Facebook, Twitter, Instagram and more recently Next Door, in our outreach efforts.
- Increase the number of self-identification survey cards returned at each public meeting via online and in person.
- Create an electronic self-identification card via Open GOV and provide the link in the chat box of the virtual meeting, so the option is available to fill out the survey.
- Provide translated documents in more instances.
- Monitor the use of the Public Meeting Forms which acts as a checklist and data collection mechanism to ensure all Program Managers are consistently following the procedures even when meetings are held virtually.
- 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 a census demographic language interaction with the public to proactively assess language access, EJ, and Title VI considerations.
- Continue to implement all stated components of existing Title VI plans.