



CITY OF

TUCSON

TRANSPORTATION & MOBILITY

TITLE VI

ANNUAL REPORT

Title VI Nondiscrimination report for the Arizona Department of Transportation (ADOT) to be included in the Federal Highway Administration (FHWA) annual report.

AUGUST 2026

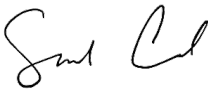


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DEPARTMENT OF TRANSPORTATION AND MOBILITY POLICY / PROCEDURE BULLETIN

SUBJECT: Title VI Non-Discrimination Policy Statement				NUMBER	PAGE
				1.50	1 of 4
				EFFECTIVE DATE: 8/01/2026	
☒	All Divisions	☐	Planning & Programming	Transportation Director Approval: 	
☐	Director's Office	☐	Traffic Engineering		
☐	Management Systems	☐	Transit		
☐	Engineering	☐	Streets & Maintenance		
☐	Park Tucson	☐	Strategic Communications		

NON-DISCRIMINATION POLICY STATEMENT

The City of Tucson, Department of Transportation and Mobility assures that no person shall on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any sponsored program or activity. There is no distinction between the sources of funding.

The City of Tucson, Department of Transportation and Mobility also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. If problems are found, those problems will be corrected as quickly as possible but will not take longer than 90 days. Additionally, the department will take reasonable steps to provide language assistance for individuals whose primary language is not English to ensure meaningful access to programs, services, and activities.

When the City of Tucson, Department of Transportation and Mobility distributes Federal-aid funds to another entity, all sub-recipients will be monitored to ensure compliance with the non-discrimination plan.

The City of Tucson (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)

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 assurance 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 **City of Tucson**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this 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.”

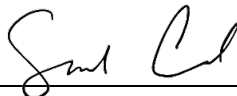
3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting 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 to 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, **City of Tucson** 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 a 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.

City of Tucson 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, sub-recipients, 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.

City of Tucson
(Name of Recipient)

By: 
(Signature of Authorized Official)

Date: 07/16/2026

DTM Title VI Program Overview

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals and groups from discrimination based on race, color, and national origin in programs and activities that receive federal financial assistance. However, the Federal Highway Administration's (FHWA) reference to Title VI includes other civil rights provisions of federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving federal financial assistance.

Programs Covered

Federally assisted programs include any highway, project, program, or activity for the provision of services and for other benefits. Such programs include education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by DTM or indirectly through contracts or other arrangements with other agents. Program area reviews may include, as applicable, planning, engineering, project development, construction, maintenance, traffic operations, transit, public outreach, consultant services, contracting, permitting, and other federally funded assisted activities administered by the Department. The results of program area reviews are considered during preparation of DTM's annual Title VI report and are used to identify opportunities for continuous improvement. Documentation associated with program area reviews is maintained by the Title VI Coordinator in accordance with applicable records retention requirements.

What type of discrimination is prohibited under DTM's Title VI program?

Discrimination under DTM's Title VI program is an action or inaction, intentional or not, through which any intended beneficiary, solely because of race, color, or national origin, has been otherwise subjected to unequal treatment or impact, under any DTM program or activity. Discrimination based on the grounds referenced above limits the opportunity for individuals and groups to gain equal access to services and programs. In administering federally assisted programs and activities, DTM cannot discriminate either directly or through contractual or other means by:

- Denying program services, financial aids or other benefits.
- Providing different program services, financial aids, or other benefits, or providing them in a manner different from that provided to others.
- Segregating or separately treating individuals or groups in any manner related to the receipt of any program service or benefit.
- Restricting in any way the enjoyment of any advantage or privilege enjoyed by others receiving any program service or other benefits.
- Denying people the opportunity to participate as a member of a planning, advisory, or similar body.
- Denying people the opportunity to participate in the program through the provision of services or affording the opportunity to do so differently from those afforded others.

The primary goals and objectives of the City of Tucson's Title VI program are:

1. Assign roles, responsibilities, and procedures for ensuring compliance with Title VI of the Civil Rights Act of 1964, and related regulations and directives.
2. Ensure that people affected by the City's programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, or national origin.
3. Prevent discrimination in all City programs and activities, both federally funded and otherwise.
4. Establish procedures for identifying impacts in any program, service, or activity that may create illegal adverse discrimination on any person because of race, color, or national origin; or on minority populations, low-income populations, the elderly, and all interested people and Title VI populations.
5. Review Title VI compliance within specific program areas.
6. Set forth procedures for filing and processing complaints by people who believe they have been subjected to illegal discrimination under Title VI in the City's services, programs, or activities.

Administration of Title VI Program & Staffing

DTM is committed to ensuring that no individual, based on race, color, or national origin, is excluded from participation in, denied benefits from, or otherwise subjected to discrimination in any program or activity it sponsors. DTM pledges to make every effort to prevent discrimination, particularly concerning the impacts of its programs, policies, and activities on minority and low-income populations. Should any issues arise, they will be addressed in a timeframe not exceeding 90 days. Furthermore, DTM will take reasonable measures to ensure meaningful access to services for individuals for whom English is not a primary language. To achieve the objectives outlined in Section IV, DTM has implemented proactive measures as detailed in this document. The procedures for filing complaints are thoroughly described in this document and are available online and in the **appendix**.

The DTM staff collaborates closely with the City of Tucson's Office of Equal Opportunity Programs (OEOP), which is responsible for implementing and enforcing equity policies within the City. This includes oversight of Administrative Directives related to language assistance services, the Americans with Disabilities Act (ADA), Title VI of the Civil Rights Act, and the City Code (Chapter 17). For further details, please visit <https://www.tucsonaz.gov/Departments/Office-of-Equal-Opportunity-Programs>.

Additionally, refer to the appendix for sample webpages and documents associated with the OEOP.

Staffing Roles

The Title VI Coordinator works with other City staff to ensure full and consistent implementation of this plan. The following are descriptions of these roles, followed by an organizational chart depicting the Title VI Coordinator's direct, independent access to the Director of Transportation.

Jennifer Bonham, Esq. - OEOP Interim Director

The Office of Equal Opportunity Programs (OEOP) implements and enforces an equal opportunity policy for the City of Tucson. OEOP ensures the implementation, compliance and enforcement of non-discrimination policies in City employment, and reviews reasonable accommodation options related to demotions and terminations stemming from the expressed inability to accommodate an employee. OEOP ensures that current City of Tucson facilities, programs, activities, and services are accessible to persons with disabilities in accordance with Tucson City Code and the Americans with Disabilities Act of 1990 (ADA). OEOP ensures that persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are afforded meaningful access to programs, services and/or activities in accordance with Section 602 of Title VI of the Civil Rights Act of 1964. OEOP investigates complaints from members of the public based on allegations that the City's programs and/or facilities are not accessible to those with disabilities. OEOP works closely with DTM staff and all City of Tucson departments to ensure equity and non-discrimination.

Samuel Credio, P.E. - DTM Director

The Director is responsible for supervising and administering the overall activities of the Department, its divisions, and employees. As such, the Director signs all necessary non-discrimination assurances to aid in ensuring all civil rights requirements are met. The Director sets DTM policies and establishes procedures to ensure Department-wide implementation of the non-discrimination plan. The Director provides opportunities for the Management Team to discuss problems, solve any issues and provide guidance to leadership through monthly Leadership Education and Development (LEAD) sessions. The Director provides guidance and strategic planning for all DTM initiatives and ensures our non-discrimination policies are implemented throughout the organization.

Paki Rico - Transportation Program Coordinator / Certification Acceptance Liaison

Liaisons will coordinate, compile, and submit to ADOT Local Public Agency (LPA) Section all FHWA / ADOT recertification documentation requested to ensure that the Arizona Certification Acceptance (CA) Program is renewed in a timely manner. This includes coordinating with Civil Rights (Title VI, ADA, DBE) on procedures as well as Procurement, Materials, Right-of-Way, Project Delivery, Internal Operations, Bid Analysis, Award, Subcontractor Approval, Performance Measures. Liaisons will work with DTM and City of Tucson staff as necessary to compile and submit the updated plans as part of the larger Certification Acceptance Program through FHWA and the ADOT LPA Section.

1. Respond to requests for information from ADOT's External Civil Rights.
2. Work with Title VI Coordinator/Team to provide guidance and technical assistance on Title VI matters with overall program responsibility and assist with preparing required annual reports regarding Title VI compliance and initiate monitoring activities including developing and reviewing directives, procedures, monitoring, and resolution of deficiencies through process improvement and training.

Kirshana Guy – Grant Writer / Title VI Coordinator

The Title VI Coordinator, housed within the Strategic Communication Division of DTM, has direct, independent access to the DTM Director concerning Title VI Program matters. The Title VI Coordinator will:

1. Attend ADOT training and meetings to implement DTM’s Title VI program.
2. Update the Title VI program plans annually and submit them to ADOT by the annual deadline.
3. Prepare and disseminate an annual report of accomplishments for the past year and goals for the next year for ADOT by the annual deadline.
4. Monitor public participation and awareness of Title VI policies and procedures for their effectiveness in reaching the public.
5. Develop Title VI information for distribution to the public as needed.
6. Document Title VI complaints; forward all discrimination complaints and Title VI complaints to ADOT for investigation. Forward all other complaints to the appropriate division for investigation.
7. Coordinate with the DTM Public Information Officer to ensure implementation of the Title VI, Language assistance Procedures, Public Involvement Plans in outreach, newsletters, press releases, printed posters, brochures, and updating the website, using social media, and ensuring there is a process to communicate road impacts in alternate languages.

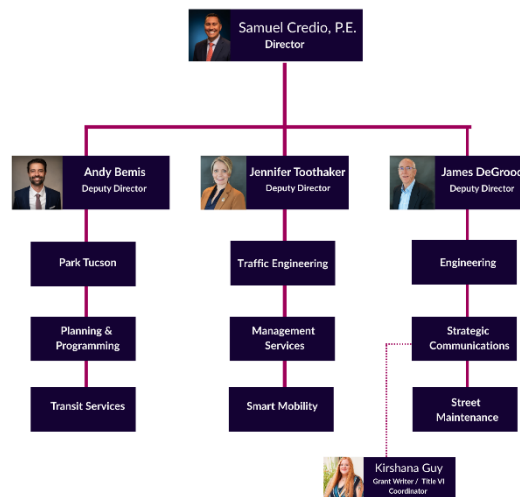
Dan Longanecker – Procurement Satellite Office

1. Ensures that current Title VI assurances/language are in any new solicitations and contracts.

Rebecca Rucker – DTM Human Resources

1. Annually coordinate Title VI virtual training for DTM staff.

DTM Organization Chart



Program Area Review Procedures

Special Emphasis Program Reviews

Special emphasis program reviews will be conducted throughout the year and be used to determine the accomplishments and goals sections of the annual report as well as the annual updated Title VI plan, both due to ADOT by August 01. This will include periodic contract compliance review as well as collection of demographic data.

Annual Program Review Data

Program reviews will be conducted based on the annual summary of Title VI activities, achievements, and complaints. The reviews will be handled by the Title VI Coordinators to ensure compliance with Title VI provisions. The special emphasis groups will have quarterly reviews of their data collected as it related to Title VI demographics. This data will be reviewed and utilized to determine if there is need to do further investigation into a specific program area.

Sub Recipient Review Procedures

As of Federal Fiscal Year 2025, DTM does not administer FHWA funding to subrecipients. Therefore, no subrecipient compliance reviews were conducted during the reporting period.

Information regarding the Title VI program will be disseminated to contractors and beneficiaries by incorporating the Title VI language in contracts. They will be obligated to sign a **DTM Title VI Agreement form** (see **Appendix N**), which outlines how DTM enacts the Title VI policies, to confirm their understanding of their responsibilities. DTM shall also ensure their sub-recipients adhere to state and federal laws and all written agreements or contracts shall include assurances that the sub-recipient must comply with Title VI and other related statutes and regulations. Each subcontractor's contract must be approved by the City's Business Services Department's Procurement Contractor Compliance team to ensure all proper documentation related to the mandatory non-discrimination language is included.

DTM administers a significant number of contracts each year using multiple funding sources. For contracts utilizing Federal Highway Administration (FHWA) funding, and to ensure compliance with Title VI and other applicable federal requirements, DTM incorporates the required Title VI Assurances contained in Appendices A and E of **USDOT Order 1050.2A** into applicable procurement documents, including Requests for Qualifications (RFQs) for Engineering Consultant Services, Invitations for Bids (IFBs) for Construction, and Requests for Proposals (RFPs) for Non-Engineering Consultant Services. DTM's Procurement Support Team reviews contract and agreement templates annually to ensure the required Title VI provisions remain current. During the reporting period, four contracts utilizing FHWA funding were awarded incorporating the required Title VI Assurances.

During the approval process, DTM staff or a party acting on behalf of DTM

(design/construction management consultant), will review subcontracts to confirm the required Title VI information is included and complete a subcontract verification form that will be provided to the Title VI Coordinator by the project manager.

All discrimination complaints against the subcontractors will be submitted to ADOT for investigation by FHWA, consistent with FHWA guidelines. If non-compliance is discovered by FHWA, DTM will make a good faith effort to ensure the sub-recipient corrects any deficiencies arising out of the complaint.

Annual Report & Training Dates

The DTM Human Resources Division, in coordination with the Title VI Coordinator, is responsible for coordinating annual Title VI training for Department employees and maintaining training records. Training documentation is retained by DTM and made available to the Arizona Department of Transportation (ADOT) External Civil Rights.

Annual Title VI Plan Updates

A copy of the DTM Title VI Implementation Plan will be submitted annually to ADOT External Civil Rights by the established reporting deadline. The annual update includes, at a minimum:

- An annually signed Title VI Policy Statement
- Annually signed USDOT Title VI Assurances
- An updated organizational chart
- An updated staffing overview; and
- Updated Title VI Program Area Review Procedures.

Complaints

If any individual believes that they or any other program beneficiaries have been the object of unequal treatment or discrimination as to the receipt of benefits and/or service, or on the grounds of race, color, or national origin, including by denial of language assistance services, they may exercise their right to file a complaint with the City. Complaints may be filed with the Title VI Coordinator (see **Appendix A**).

Remedial Action

The City, through the Title VI Coordinator, actively works to prevent deficiencies and violations and takes appropriate action to ensure compliance with all applicable program requirements. When deficiencies are identified, corrective actions will be documented and implemented promptly. Corrective action plans will be developed within 90 days of identifying a deficiency, unless circumstances require an alternate timeframe consistent with applicable federal or state guidance.

In addition to corrective actions, DTM monitors information obtained through program area reviews, demographic analyses, public outreach activities, customer feedback, Title VI complaints, and periodic reviews of departmental policies and procedures to identify trends or patterns that may indicate barriers to participation or meaningful access to federally assisted transportation programs, services, and activities. When potential

deficiencies or instances of noncompliance are identified, the Title VI Coordinator works with the appropriate division to develop, implement, and monitor corrective actions until the issue has been satisfactorily resolved.

Data Collection & Analysis

The City collects Title VI data through all public outreach activities, both in-person and virtual. Bilingual survey cards (see **Appendix E**) include three questions: 1. Race/ethnicity; 2. Age; and 3. Sex. Survey cards also include a section on “Title VI – Know Your Rights” below the survey questions. Public Meetings are held in-person or virtually via Microsoft Teams. At virtual meetings, the City will use Office 365 online surveys to gather the same information as the paper surveys. The City utilizes many outreach methods where survey cards are collected. This includes in-person public open house meetings, tabling events, festivals, popup or demonstration projects, neighborhood meetings, community walk audits, bike rides, workshops, and speaker events. Some of these formats have also been held virtually over the past year or have taken a hybrid approach. At all events, brochures are also provided with background information on Title VI and information on how and why Tucson collects demographic data. Data analysis is conducted throughout project development and following public outreach activities to help inform future engagement efforts and evaluate Title VI compliance. DTM also reviews demographic information and public participation data to identify potential trends or disparities that may indicate barriers to participation or access to federally assisted transportation programs and services.

The City of Tucson will compare data collected during the outreach process (survey cards with demographic data on age, race, sex) to census data found within the project area. To do so, the City will use census data and the online mapping tool Remix, which allows the City to set specific boundaries (such as a ¼ mile buffer along a corridor) and determine the demographics of the area. Data that will be collected using Remix, which includes:

- Population demographics
- Percentage of individuals that are non-White or of Hispanic/Latino origin
- Percentage of individuals who are 65 and older.
- Percentage of individuals who are 17 and younger.
- Percentage of individuals whose primary language is not English, including those who reported speaking English less than “very well”
- Percentage of individuals in poverty.

DTM uses demographic information collected through public outreach, U.S. Census Bureau American Community Survey (ACS) data, Remix analyses, community feedback, and project-specific demographic evaluations to identify potential barriers to participation, evaluate the effectiveness of public outreach strategies, determine appropriate language assistance measures, and support equitable access to transportation programs, services, and activities.

Public Meeting Preparation Checklist: This form is to be filled out prior to a public meeting, whether virtual or in-person, such as town hall meetings, open house meetings, or community events. Once the meeting has ended, return this filled out form to Kirshana Guy, along with all Title VI surveys within 14 days of the event.

Project Name:

Project Manager:

Purpose of Meeting:

Date & Time:

Location:

Prior to the Meeting:

- ☐ Ensure paper mailings and online postings include the required statement “If you require a foreign language interpreter...”
- ☐ Document any requests for accommodation and notify Kirshana Guy
- ☐ Review Demographics surrounding the project area on Remix and through census data, and provide all materials and vital documents in languages based on languages used by the population in the area
- ☐ Contact Kirshana Guy to arrange notifications with the media and online/social media
- ☐ Estimate the total number of attendees based on attendance at similar events, and print brochures and surveys

During the Meeting:

- ☐ Display Title VI Brochures and Posters at entrance or sign-in table
- ☐ Provide printed surveys and ask participants to fill out the surveys after signing in
- ☐ Count the total number of attendees

After the Meeting:

- ☐ Return this form to Kirshana Guy along with all collected Title VI surveys.

Analysis:

After each public outreach event, the information collected from the surveys will be tallied up and compared to base demographic data available in the project area. DTM staff will input this information on the table below to determine where discrepancies may exist. If there are discrepancies, the city will develop a report with a list of action items to improve representation that reflects the local community.

Data Comparisons Table

	Event % if Pop. 65+	Area % of Pop. 65+	Event % of Pop. 17-	Area % of Pop. 17-	Area Race & Demographic Breakdown	Event % Female, Male
Discrepancy						

Project Area

Project Name: Fairview Avenue Modernization Project

The Fairview Avenue Modernization Project consists of transportation improvements along Fairview Avenue between Wetmore Road and Grant Road within the City of Tucson. The project is intended to improve roadway operations, safety, multimodal connectivity, and overall corridor conditions. Planned improvements may include pavement rehabilitation, intersection upgrades, bicycle and pedestrian accommodations, ADA accessibility improvements, drainage enhancements, traffic signal modifications, and other complete streets elements as identified during project development. The project supports the City's goal of providing a safer and more efficient transportation network for all users.

Project Purpose and Need

The purpose of the project is to improve mobility and safety for multimodal travelers including transit users, and emergency responders while extending the useful life of the roadway infrastructure. The project is intended to:

- Improve traffic operations.
- Enhance pedestrian accessibility and ADA compliance.
- Increase connectivity for all travelers.
- Improve roadway drainage where necessary.
- Improve overall corridor safety.
- Preserve existing transportation infrastructure.

Data Collection

The Fairview Avenue corridor extending from Wetmore Road south to Grant Road, includes adjacent census block groups that are reasonably expected to experience direct or indirect project impacts. For demographic analysis purposes, the project area includes the Fairview Avenue corridor and adjacent census geography within an approximate one-half-mile buffer, representing the population reasonably expected to experience direct or indirect project impacts.

Statistical data on age, race, and sex will be gathered and maintained by the DTM Title VI Coordinator from public outreach meetings. At public meetings, staff request participants to voluntarily complete Self-Identification Survey forms (see **Appendix F**). From the data collected, staff will evaluate participants attending the public meetings and the estimates of prime and subcontractor participation, which will be analyzed for discriminatory trends and patterns to formulate special emphasis and language assistance measures utilized when reporting annually to ADOT External Civil Rights. The gathering procedures will be reviewed annually to ensure sufficiency of the data in meeting the requirements of the Title VI Program, to help determine who attends public meetings, and if any disparities are identified. If a deficiency is found, staff will review and compare the demographics found using U.S. Census Data and census data on Remix for the target area to determine if DTM needs to make any additional efforts to reach the

appropriate individuals to participate in our projects. DTM will work with staff to provide resources and further training to achieve full compliance. The demographic information collected through public outreach, project-specific survey cards, Remix analyses, and U.S. Census Bureau American Community Survey (ACS) data is reviewed throughout project development to evaluate whether outreach activities are effectively reaching the populations within the project area. DTM compares demographic information collected during public engagement with available census data to identify potential disparities in participation, evaluate the effectiveness of public outreach strategies, assess language assistance needs, and support equitable access to transportation programs, services, and activities. Where appropriate, outreach strategies and language assistance measures may be adjusted based on findings.

Data Analysis

The Fairview Avenue Modernization project spans approximately 2.5 miles and has a combined population of approximately 19,241 across six census tracts in the project area (2024: American Community Survey (ACS) 5-Year Estimates Detailed). Table 1 summarizes the Service Area Language Population (Table C16001) for the Fairview Avenue Modernization project extending from Wetmore Road south to Grant Road.

Table 1: American Community Survey 5-Year, C16001 Data for Project Area

Language Label	Project Population
Total project population: Fairview Avenue from Grant Road to Wetmore Road	19,241
English Speaking Only	11,619
Speak English “less than very well,” ACS).	
Spanish	2,710
Other Indo-European languages	131
Chinese (incl. Mandarin, Cantonese)	126
Vietnamese	227
Other Asian and Pacific Island languages	23
Arabic	29
Tagalog (incl. Filipino)	0
Korean	0
French, Haitian, or Cajun	0
German	0

Russian, Polish, or other Slavic languages	0
Other and unspecified languages	0

To calculate the Safe Harbor Threshold for the project area, DTM staff used the 2024 American Community Survey (ACS) 5-Year Estimates to determine whether five percent (5%) of the project area’s population or 1,000 individuals, whichever is less, speak a language other than English and report speaking English less than “very well.” The Fairview Avenue Modernization Project area has an estimated population of 19,241; therefore, five percent of the project population equals 962 individuals. Since 962 is less than 1,000, the Safe Harbor Threshold for this project area is 962 people.

Safe Harbor Threshold: $19,241 \times 0.05 = 962.05$

Based on the ACS language data, Spanish is the only non-English language spoken by individuals that exceeds the Safe Harbor Threshold, with an estimated 2,710 individuals. Accordingly, DTM will continue providing vital Title VI notices, public meeting announcements, and other vital documents including language assistance information in both English and Spanish for this project. Language assistance for speakers of other languages will continue to be provided upon request, consistent with the City’s language assistance procedures and Title VI Program.

Fairview Avenue Modernization Project Public Outreach

Public outreach for the Fairview Avenue Modernization Project was conducted to provide residents, businesses, property owners, and corridor users with opportunities to learn about the proposed improvements and provide input throughout project development. DTM conducted two public outreach meetings at the Jacobs YMCA, located within the project area, on May 30, 2026, from 9:30 a.m. to 11:00 a.m., and June 02, 2026, from 5:30 p.m. to 7:00 p.m. Offering meetings during both daytime and evening hours was intended to provide flexible opportunities for community participation.

Public meeting notices and project information were made available through the City’s established public outreach process to inform the community of upcoming meetings and opportunities to provide comments. Meeting materials described the proposed roadway modernization improvements, including roadway rehabilitation, bicycle and pedestrian enhancements, ADA accessibility improvements, drainage improvements, and other multimodal corridor enhancements.

Consistent with DTM’s Title VI Program, meeting notices included information regarding language assistance services and reasonable accommodation. Translation and interpretation services, accessible meeting materials, and other accommodations were available upon request to ensure meaningful access for individuals whose primary language is not English and for persons with disabilities.

While attendance records and demographic survey information were not available for

these initial outreach meetings, DTM maintains established Title VI procedures for documenting participation and collecting voluntary demographic information during public outreach activities whenever feasible. As the project advances, DTM will continue collecting and evaluating public input and available demographic information to assess whether outreach efforts are representative of the project area and to identify opportunities to further engage the public. This information will be compared with project area demographic data to evaluate the effectiveness of outreach activities and inform future public engagement efforts.

The demographic analysis, Safe Harbor Threshold evaluation, Four Factor Analysis, and public outreach results were collectively used to determine appropriate language assistance measures and support public participation for all throughout project development.

Actions to Address Deficiencies

Where deficiencies are found in representation at public meetings, a process will be initiated to

- 1) Identify problems or missteps in the outreach process; and
- 2) Develop recommended action items in a formal memo to improve representation and eliminate deficiency.

Both parts of the process will be organized, led, and documented by the ADA Coordinators.

1) Identifying the Challenges

The ADA Coordinators will form a task group to evaluate the outreach deficiencies, with a form that documents issues and includes questions such as:

- What were the specific deficiencies in representation?
- Are there historical challenges for representation in this area?
- What strategies have worked best for improving representation previously?
- What type of outreach was conducted (i.e. did everything follow Title VI and City protocols for community engagement?)
- Who led the outreach effort?
- Was a review of area demographics completed in advance of the event/meeting?

2) Developing Solutions

By identifying the issues impacting representation, the city will develop a list of recommended actions for immediate and long-term improvements. These actions will be documented in the memo, with specific groups or individuals listed as “responsible parties” for implementing the recommendations. The ADA coordinator will oversee the follow-up and ensure recommended strategies are applied prior to all future FHWA-funded programs, projects, or activities.

Public Dissemination

DTM will disseminate Title VI Program information to City employees and to the public through a variety of forums and tools, including project specific websites and social media. Title VI Program information will be submitted to sub-recipients, contractors, and beneficiaries. Public dissemination will include inclusions of Title VI language in contracts and publishing the DTM's Title VI Plan on the intranet and internet as well as publishing brochures and hanging posters in public areas. See **appendix** for samples of brochures and posters on the 4th and 6th floors of the Public Works building at 201 N. Stone where DTM is headquartered.

Pima Association of Governments / Regional Transportation Authority Partnership

DTM works within the Pima Association of Governments' (PAG) and Regional Transportation Authority (RTA) to use data, developed to show the concentration distribution of "protected" classes (as defined by federal regulation) within the region for long-range transportation planning and capital projects. DTM's and PAG's public involvement efforts have generated large databases of stakeholders and members of the public identified through a variety of public involvement efforts over the years. These records are utilized and include civic and community organizations serving Title VI populations, neighborhood and homeowner associations, environmental and business groups and other public groups. PAG/RTA ensure compliance with Title VI and related statutes. See weblinks for detailed data analysis and long-range strategic transportation planning for the region.

RTA Title VI: <https://rtamobility.com/title-vi/>

PAG Long-Range Regional Transit Plan:

<https://pagregion.com/mobility/transportation-planning/long-range-regional-transit-plan/>

Public Participation Plan

DTM's public involvement plan provides for full and fair participation for all potentially affected communities. Identifying these communities requires close coordination between the development and implementation of the public involvement effort and the data collection and analysis phases of the planning process, all of which are subject to Title VI.

The data collection phase provides information on the protected populations, which are often synonymous with the underserved/under-represented populations and, therefore, may need particular attention in the public involvement effort.

The analysis phase provides information on the potential level of impact on the various populations that will need to be integrated into those public involvement efforts seeking input on alternative development, alternative preferences, and/or mitigation. DTM addresses Title VI requirements both quantitatively and qualitatively with thorough public involvement and data analysis techniques.

To foster public participation, staff in each project ensure that information is readily accessible and ensure that the people likely to be affected by and/or interested in a program or project are identified and made aware of opportunities to participate. The following sections address each of these practices in more detail.

Access to DTM Information

DTM's documents, data, and information, with few exceptions, are a matter of public record. As such, any request from a member of the public for a DTM document is responded to in a timely manner. At a minimum, a written response is provided within one week of receipt of a public information request.

Stakeholder Analysis

DTM staff analyzes who will be affected and/or interested in the planning issue or policy being developed. This involves identifying both internal and external stakeholders.

Internal stakeholders typically include DTM staff involved in related activities and other governmental agencies with jurisdiction or interest in the activity. External stakeholders typically include those non-governmental parties who may be affected by the activities and/or have an interest in them.

Many of DTM's projects have lists compiled of project-specific external stakeholders. For each new activity, or over the course of longer activities, these lists are reviewed to ensure they are up-to-date and reasonably reflect the broadest range of stakeholders. One common method for identifying additional stakeholders is to interview existing stakeholders to determine who else needs to be involved.

DTM's staff and project teams maintain large databases of stakeholders and members of the public identified through a variety of public involvement initiatives over the years.

These databases include civic and community organizations serving Title VI populations, neighborhood and homeowner associations, environmental and business groups, elected officials, and other public groups.

Public Notification of DTM Activities and Services

Promotion of inclusive and accessible public involvement includes regular efforts within each DTM program or project to notify the public and a wide range of stakeholders regarding the information, data, funding, policy and issues being addressed.

Public information is presented in formats that are accessible to the intended audience. DTM staff determines what information is appropriate to publicize and in what form.

For reaching the public, the City of Tucson website, media outreach (e.g., news releases) and social media channels are encouraged. DTM promotes public meetings and notifications through Facebook, X, Instagram, and Next Door to ensure the highest reach of constituents possible. Additionally, notification letters and post cards are sent out to the public.

For reaching stakeholder groups, distribution of public information documents such as reports and newsletters via direct mail may also be an effective communication method. The use of other methods is considered to promote equal access to information for target audiences. Efforts are being made to address the challenges faced by underserved populations, youth, and others who may lack internet access or read newspapers, to improve access to information.

Public service radio announcements on Latino radio outlets serve as an effective means to connect with Hispanic populations, especially those who do not speak English.

Additionally, underserved populations are like others in that they tend to engage with information shared through reliable and familiar communication channels. Notices are distributed via email for inclusion in school and community-based newsletters.

Placement of English/Spanish information in libraries, community centers, and other public venues is another strategy employed.

DTM also contracts community ambassadors, who are individuals assigned to specific projects and possess knowledge about the geographic area and community involved. These community ambassadors leverage their existing local networks to disseminate information and connect the community to the work of the department.

Spanish Translations

As indicated by DTM, Spanish is the predominant primary language spoken by those in the DTM Service area who speak English “less than very well.”

Public information documents written in English, including meeting notices, include a tagline affirming that DTM will make reasonable accommodation to translate any

materials in Spanish. As a rule, Spanish-speaking project personnel are on hand at public meetings intended for gathering input.

Spanish translations are used for activities targeted to the public where Spanish language materials have been identified as beneficial, even without a request.

Examples of materials to be translated include meeting notifications (e.g., flier or web posting). Additional information that is translated upon request includes any public meeting handouts, such as fact sheets, newsletters, and executive summaries of planning documents under review.

Task Force Composition

Efforts are made to assess the composition of DTM's task forces and advisory committees to ensure that invited members represent a cross-section of key stakeholder groups.

Geographic Analysis of Underserved Populations

The Title VI Coordinator will conduct periodic meetings internally with DTM staff to ensure sufficient data is being gathered (i.e., race, color, and national origin) to meet the requirements of the Title VI Program. Staff within each project periodically perform a basic assessment to identify the location of protected Title VI populations in relationship to the provision of information and planning products and services.

Pima Association of Governments' online regional data provides project staff with maps showing the location of protected Title VI populations for any specific geographic areas. ZIP Code maps are used to show locations of people in databases. The maps of protected populations and mailing list ZIP Codes are compiled as one way to demonstrate that protected populations are being notified and/or involved. This documentation is important for demonstrating compliance with Title VI and other provisions.

Meeting Scheduling, Location and Access

Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

When a public meeting or public hearing is focused on a planning study or project related to a specific geographic area within the DTM region, the meeting or hearing is held within that geographic area. Appropriately elected officials, as identified in the stakeholder analysis, are consulted and/or informed of relevant outreach activities within their jurisdictions.

Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible. The meetings may also be held in non-traditional venues in areas that tend to have lower turnout to more traditional open

house style meetings. DTM has held meetings in local restaurants, outside of public buildings during events, and other locations.

DTM holds public meetings in-person, virtually, or with a hybrid approach. These meetings include a call-in option so that those without internet or computer access are still able to join.

Title VI Information on the DTM Website

DTM maintains a Title VI section on the DTM website where the public can learn about DTM's Title VI commitments, Non-Discrimination Policy and language assistance plans as well as download the Title VI complaint process and complaint form. These materials are posted in both English and Spanish. A "Google Translate" button is also included on the Title VI webpage to allow users to translate the entire DTM website into over 50 languages. The public can access the English and Spanish versions of the Title VI web pages from DTM's homepage.

<https://www.tucsonaz.gov/Departments/Transportation-Mobility/Title-VI-Civil-Rights>

National Origin Nondiscrimination and Language Assistance Procedures

Purpose/Legal Authority

Individuals whose primary language is not English may require language assistance to meaningfully access DTM programs, services, activities, and public participation opportunities. Because language barriers may limit access to federally assisted programs, DTM provides reasonable language assistance measures to help ensure meaningful access consistent with Title VI's prohibition against discrimination based on national origin. It is important that DTM be innovative and proactive in engaging individuals including oral and written language services, as detailed in this document.

Four Factor Analysis

A Four Factor Analysis will be conducted on a project-by-project basis assessing language needs and determining what steps should be taken to ensure meaningful access to programs, services, and activities for individuals whose primary language is not English:

1. The number or proportion of individuals whose primary language is not English that are eligible to be served or likely to be encountered by a program, activity or service.
 - a. In Pima County, Spanish speakers represent the main group of individuals with language assistance needs that DTM is likely to encounter. According to the United States Census Bureau's 2024 American Community Survey (ACS) data (Table **C16001: Language Spoken at Home for the Population 5 Years and Over**), the total population is approximately 1,029,272. Nearly **210,821 people** speak Spanish, accounting for **20.48%** of the population. Of these Spanish speakers, **64,178 individuals** (or 30.44%) reported that they speak English less than "very well." This means that Spanish-speaking individuals make up **30.44%** of Pima County's total population.
 - b. For the City of Tucson, according to the U.S. Census Bureau's 2024 American Community Survey (ACS) 5-Year Estimates, Table C16001 (Language Spoken at Home), the total population is approximately 527,150. Nearly **129,782 individuals** speak Spanish, accounting for **24.6%** of the population. Of these Spanish speakers, **43,232 individuals** (or 33.3%) reported that they speak English less than "very well." This means that 43,232 individuals, representing approximately 8.2% of Tucson's total population, may require language assistance to meaningfully access programs, services, and activities. In contrast, individuals who speak Asian languages, including Korean, Chinese, Vietnamese, and other Asian languages, represent 7.1% of Tucson's population, with a total population of 37,211. Of those, 11,560

(or 31.1%) reported that they speak English less than “very well,” representing approximately 2.2% of Tucson’s total population.

2. **The frequency with which individuals requesting language assistance services encounter the program.** DTM assesses the frequency at which staff have or could possibly have contact with individuals whose primary language is not English. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. As discussed above, census data indicate that there is a fairly large percentage of the general population of Tucson whose primary language is Spanish. As a transportation agency, it is necessary for DTM to recognize this segment of the general population. Phone inquiries and staff feedback also indicate that individuals who are predominantly Spanish-speaking have regular contact with DTM services.
3. **The nature and importance of the program, activity or service provided by the recipient.** DTM keeps Tucson moving smoothly and safely. DTM’s nearly 300 employees oversee the maintenance, new construction, and reconstruction of nearly 5,800 lane miles of streets, and are responsible for stormwater and flood control services, public art pieces, streetlights and signs, and traffic lights and signals in Tucson. DTM also operated the city’s transit services, including Sun Tran, Sun Van and Sun Link.
4. **The resources available to the recipient and related expenses.** DTM continually assesses its available resources that may be used to provide language assistance. As internal guidance, ***Administrative Directive 2.05-9*** ensures that there is language communication skill compensation for employees, and an Administrative Directive 2.01-1D that establishes language services for individuals whose primary language is not English to ensure compliance with national origin under Title VI (see **Appendix C** and **Appendix D**).

Resources include identifying bilingual staff, training front-line personnel in the use of the Language Line resources, reviewing the existing City of Tucson contracts for professional translation-services providers, determining which documents should be translated, and deciding on the level of staff training needed. In accordance with the four factors analysis above, DTM has procedures in place for providing language assistance to individuals whose primary language is not English. There are five areas that make up the language assistance measures:

- Identifying individuals whose primary language is not English.
- Sharing language assistance measures, including Language Line Solutions live translation services, which are available to DTM staff 24 hours a day, 7 days a week.
- Training staff.
- Providing notice to individuals whose primary language is not English on the resources available.
- Monitoring and updating available plans and resources.

A. Identifying Individuals Requiring Language Assistance

DTM uses demographic data, public engagement activities, constituent interactions, and staff observations to identify the language assistance needs of the community. Where applicable, DTM also utilizes REMIX to better understand community demographics and travel patterns. Based on the Four-Factor Analysis and the U.S. Census Bureau's American Community Survey (ACS) 5-Year Estimates, Spanish-speaking individuals represent the primary population likely to require language assistance within Tucson. Census data also helps identify geographic areas where language assistance resources may be needed to support meaningful access to DTM programs, services, activities, and public participation opportunities.

There are ten ZIP code areas with a higher percentage of individuals whose primary language is not English than the overall city of Tucson average: 85701, 85705, 85706, 85711, 85713, 85714, 85719, 85730, 85745 and 85746. In general, higher concentrations of individuals whose primary language is not English are located on the south and west sides of Tucson, particularly in the area between Interstate 10 (I-10) and I-19. Identifying these geographic concentrations helps DTM target outreach efforts and provide appropriate language assistance where it is most needed.

In addition to Census data, REMIX, and input from Customer Service Representatives, DTM uses the following methods to identify individuals who may require language assistance:

- At open houses, public meetings, and other community outreach events, DTM staff collect data from completed Language Identification Flashcards, when provided, to help identify language assistance needs. Notices describing available language assistance measures are posted in customer service areas to encourage individuals whose primary language is not English to self-identify.
- Self-Identification Survey cards are made available at public events to encourage voluntary self-identification and to help DTM evaluate community language assistance needs.
- DTM continues to evaluate community needs and implements additional strategies, as appropriate, to ensure meaningful access to programs, services, activities, and public participation opportunities.

B. Language Assistance Measures

To provide meaningful access and exemplary customer service, DTM offers a variety of language assistance measures. Whether communicating in person, by telephone, or in writing, DTM provides both oral and written language assistance services to help ensure meaningful access to programs, services, activities, and public participation opportunities for individuals whose primary language is not English. City of Tucson ***Administrative Directive 2.05-9*** establishes the City's language access procedures and is included in the **Appendix**. DTM provides language assistance through the following measures:

- **Language Line Solutions** is available to DTM staff 24 hours a day, 7 days a week, to provide interpretation services in more than 240 languages.
- **Language Identification Flashcards** are available to help staff identify an individual's preferred language and connect them with appropriate interpretation services.
- **Spanish-speaking personnel** are available at public meetings and open houses, when appropriate, to assist with public participation and communication.
- An **automated telephone system** directs Spanish-speaking callers to a bilingual Customer Service Representative.
- **Bilingual Customer Service Representatives** are available to respond to telephone calls, emails, and written correspondence in Spanish.
- DTM provides **Second Language Pay** for employees in designated classifications that have significant public interaction, consistent with **Administrative Directive 2.05-9**.
- The **DTM website** includes translation functionality that allows users to access webpages and online forms in multiple languages.
- Vital documents are translated into Spanish when necessary to provide meaningful access to programs and services. Examples include, but are not limited to, public meeting notices, open house invitations, stormwater information, right-of-way permits, ADA paratransit eligibility applications, and more.
- The City of Tucson maintains contracts for **professional translation and interpretation services**, including written translation, oral interpretation, sign language interpretation, Braille, large-print, and other accessible communication formats, as needed.

To ensure the quality of language assistance services, bilingual staff receiving Second Language Pay must demonstrate proficiency in both English and Spanish in accordance with City of Tucson Human Resources requirements. Professional translation and interpretation providers are utilized for more complex documents and specialized language services, including American Sign Language interpretation.

Customer Service Representatives document and route service requests and inquiries to the appropriate DTM divisions. Oral language assistance is available through bilingual staff located in customer service centers, field operations, and public information functions, supplemented by Language Line Solutions when additional interpretation services are needed.

C. Training Staff

The DTM Human Resources Division is responsible for coordinating department-wide Title VI training in collaboration with the Title VI Coordinator. Training is provided to ensure employees understand their responsibilities under Title VI of the Civil Rights Act of 1964, related nondiscrimination requirements, and the Department's Language

Assistance Procedures. Training is provided to employees whose job duties involve public contact, customer service, public engagement, project development, permitting, or other activities where interaction with members of the public may occur. Topics may include:

- Title VI nondiscrimination requirements and protected classes.
- The Department's Language Assistance Procedures and available language assistance measures.
- Identifying individuals who may require language assistance.
- Accessing and using Language Line Solutions and other interpretation resources.
- Proper use of Language Identification Flashcards and Self-Identification Survey cards.
- Procedures for obtaining translated documents and interpretation services.
- Responsibilities for documenting language assistance requests and referring individuals to appropriate resources.
- Effective communication with individuals whose primary language is not English.

Regarding staff training, the Title VI Coordinator of the Department of Transportation and Mobility disseminated virtual Title VI training to all DTM staff between Monday, July 20, 2026, and Tuesday, July 28, 2026. This training included a PowerPoint presentation with an embedded YouTube video produced by the Federal Highway Administration (USDOTFHWA) titled "Overview of FHWA's Civil Rights Program Requirements for Local Public Agencies." In addition, a one-page summary was distributed (refer to **Appendix**). A 23-minute video from the Department of Justice, entitled "Understanding and Abiding by Title VI of the Civil Rights Act of 1964," is provided as reference material for training refreshers and it mandatory for new staff training.

The Title VI Coordinator conducts Title VI training sessions for Engineering Project Managers, Inspection Supervisors, and available third-party consultants annually. In this training session, the Title VI Coordinator is introduced as the streamlined contact for Engineering staff for all Title VI related questions or concerns. The training utilized the Title VI PowerPoint presentation (see **Appendix P**), and the Title VI Coordinator provides attendees with updated copies of the Public Meeting Preparation Checklist (see **Appendix H**) and information about utilizing Language Line Solutions for individuals whose primary language is not English. The session also covers how to determine the Safe Harbor Threshold for a project area using U.S. Census Bureau data, as detailed in the ADOT Annual FHWA Title VI Training.

Title VI training is mandatory as part of the General Onboarding Procedures for Supervisors. This checklist, which is mandatory for all new hires, must be completed by the new employee's supervisor and returned to HR. It ensures that the new employee fulfills all required training, including Title VI, effective July 29, 2025. To meet the Title VI training requirement, new employees must:

- Review the Title VI PowerPoint updated by the Title VI Coordinator annually, and the Language Assistances Measures training materials.
- Watch a 23-minute video provided by the Justice Department and complete the

accompanying post-video quiz.

- Receive updated copies of all Title VI materials, including DTM's internal Preventing Discrimination one-page handout (see **Appendix O**), the revised Language Line process, and DTM's signed policy statement.

DTM Administrators and Supervisors of areas that have public contact are crucial in implementing Title VI and Language Assistance Measures. Copies of language assistance measures are distributed to all Department Administrators/Division Heads, and it is their responsibility to disseminate the updated information to appropriate staff, including during new employee orientation. Topics to be addressed during training for new employees and revisited for continuing DTM employees include, but are not limited to:

- Understanding the Title VI responsibilities.
- Overview of language assistance services offered by DTM.
- Specific procedures to be followed when encountering individuals whose primary language is not English.
- How to use "I Speak" multi-language identification cards.
- How to contact Language Line translation services if needed.

Annual Title VI training includes, at a minimum, an overview of Title VI requirements, nondiscrimination obligations, complaint procedures, public participation requirements, language assistance measures, and employee responsibilities for ensuring meaningful access to DTM programs, services, and activities.

Public Information staff members are also a key element in the implementation of language assistance measures. Public Information staff produce nearly all written forms of communication to the customer base and community and are diligent in ensuring that language assistance measures are followed by serving individuals whose primary language is not English.

Information regarding the Title VI program will be communicated to consultants, contractors, and beneficiaries by incorporating the Title VI language into contracts and requiring them to sign the DTM Title VI Agreement form (see **Appendix N**). DTM will also ensure that sub-recipients comply with both state and federal laws. All written agreements or contracts must include assurances that the sub-recipient is obligated to adhere to Title VI, along with other applicable statutes and regulations. Additionally, a signed DTM Title VI Agreement form is required. By including Title VI language in contracts and requiring approval of subcontractor agreements, the process educates subrecipients on necessary compliance with non-discrimination laws.

Each subcontractor's contract must be approved by the City's Business Services Department's Procurement Contractor Compliance team to ensure all proper documentation related to the mandatory non-discrimination language is included. The review and verification process conducted by DTM staff or consultants' acts as an oversight mechanism, further ensuring that subrecipients understand and adhere to Title VI requirements, as relayed by the annual Title VI training hosted by the Title VI Coordinator.

C. Providing notice to people whose primary language is not English

DTM provides notice that language assistance services are available at no cost to individuals whose primary language is not English. These notices are intended to help ensure that members of the public are aware of the language assistance resources available to access DTM programs, services, activities, and public participation opportunities.

Notice of available language assistance may be provided through a variety of methods, including:

- Language assistance statements included on public meeting notices, project outreach materials, and other public communications, as appropriate.
- The DTM website, which provides information about available language assistance services and translation functionality.
- Customer service locations where notices informing the public of available language assistance are displayed.
- Self-Identification Survey Cards and Language Identification Flashcards used during community outreach events.
- Bilingual staff, Customer Service Representatives, and Language Line Solutions.
- Public outreach materials and vital documents translated into Spanish, when appropriate, to support meaningful access.

DTM periodically evaluates its methods of providing notice to help ensure language assistance information remains accessible, visible, and responsive to community needs.

D. Language Line System

Language Line Solutions provides professional telephone interpretation services to assist DTM staff in communicating with individuals whose primary language is not English. The City of Tucson Department of Transportation and Mobility maintains an account with Language Line Solutions, and front-line personnel receive training on how to access and utilize this resource. DTM Training Presentation attached (see **Appendix P**).

When a front-line employee receives a telephone call from an individual who requires language assistance, the employee places the call on hold and contacts Language Line Solutions to request interpretation services. If the individual's language is known, staff request an interpreter for that language. If the language is unknown, the Language Line Solutions representative assist staff in identifying the language before connecting a qualified interpreter to the call. Once connected, the interpreter facilitates communication between the individual and DTM staff, helping to ensure meaningful access to Department programs, services, activities, and public participation opportunities.

Language Line Solutions is available to DTM staff as an internal language assistance resource and supplements the Department's bilingual staff and other language assistance measures.

Monitoring and Updating the Language Assistance Procedures

The National Origin Nondiscrimination and Language Assistance Procedures are intended to be flexible and responsive to the changing needs of the community. DTM periodically reviews these procedures to evaluate their effectiveness and determine whether updates are needed to continue providing meaningful access to individuals whose primary language is not English.

National Origin Discrimination Complaints

Complaints alleging discrimination based on national origin, including concerns related to language assistance, should be directed to the City of Tucson's Office of Equal Opportunity Programs (OEOP) in accordance with City of Tucson policy. The Department of Transportation and Mobility (DTM) follows the City's established complaint procedures for receiving and processing Title VI and national origin discrimination complaints.

External and internal discrimination complaint forms are available online at:

<https://docs.tucsonaz.gov/Forms/OEOP-Discrimination-Complaint>.

The City of Tucson's **Administrative Directive #2.05-9** establishes the City's language access policies and procedures. A copy of the Administrative Directive is available on DTM's Title VI webpage and in the Appendix:

<https://www.tucsonaz.gov/Departments/Transportation-Mobility/Title-VI-Civil-Rights>.

Dissemination of the National Origin Nondiscrimination and Language Assistance Procedures

The Department of Transportation and Mobility's resources related to national origin nondiscrimination and language assistance measures are available to City employees through the Office of Equal Opportunity Programs (OEOP) intranet and are included as part of DTM's Title VI Program documentation. Copies of these procedures are available upon request.

Review of Local Directives for Title VI Implications

The City of Tucson Department of Transportation and Mobility (DTM) reviews local administrative directives, departmental policies, and procedures that may affect the delivery of federally assisted transportation programs, services, or activities to ensure consistency with Title VI of the Civil Rights Act of 1964 and other applicable federal nondiscrimination requirements. During the development or revision of directives, the Title VI Coordinator works with the appropriate program staff to evaluate whether proposed changes could have implications related to race, color, or national origin, including meaningful access for individuals whose primary language is not English.

If potential Title VI implications are identified during the review process, DTM coordinates with the appropriate City departments and program staff to address the

identified concerns and revise the directive, policy, or procedure, as appropriate, prior to implementation. This review process helps ensure that departmental directives remain consistent with applicable federal civil rights requirements and support access to DTM programs, services, and activities for all.

Filing a Title VI Complaint

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 that relate to any Federal Highway Administration (FHWA) program or activity administered by the City of Tucson Department of Transportation and Mobility (DTM), including its subrecipients, consultants, and contractors.

Complaints alleging discrimination based on race, color, or national origin may include concerns regarding the denial of meaningful language assistance or language access services. In addition to these procedures, complainants retain the right to file with other appropriate state or federal agencies or pursue other legal remedies, as permitted by law.

The following procedures apply to FHWA Title VI complaints filed against the City of Tucson Department of Transportation and Mobility (DTM), its subrecipients, contractors, or consultants.

Compliant Procedures

1. Any person, class of persons, or entity that believes they have been subjected to discrimination in an FHWA-related program or activity on the basis of race, color, or national origin, as prohibited under Title VI, may file a formal complaint with the City of Tucson Department of Transportation and Mobility. A copy of the Title VI Complaint Form is available electronically at:

<https://docs.tucsonaz.gov/Forms/OEOP-Discrimination-Complaint>

2. A complaint must be filed within 180 calendar days of the alleged discriminatory act or the date on which the alleged discrimination became known to the complainant.
3. Complaints should be submitted in writing, signed by the complainant, and may be filed by mail, email, fax or in-person. A complainant may also contact the City of Tucson Department of Transportation and Mobility by telephone to provide the complaint for transcription. Once transcribed, DTM will provide a written complaint to the complainant for review, correction, and signature.
4. A complaint should include, at a minimum, the following information:
 - a. A written explanation of the alleged discriminatory act(s).
 - b. Contact information for the complainant.
 - c. The basis of the complaint (e.g., race, color, or national origin).
 - d. Identification of the respondent (individual, agency, organization, consultant, contractor, or subrecipient) alleged to have engaged in the alleged discriminatory action.

- e. Sufficient information describing the facts and circumstances that led the complainant to believe discrimination occurred in an FHWA-funded program or activity administered by DTM or one of its consultants, contractors, or subrecipients.
 - f. The date(s) of the alleged discrimination act(s).
5. Upon receipt of a completed FHWA Title VI complaint, the City of Tucson Department of Transportation will forward the complaint to the Arizona Department of Transportation (ADOT) External Civil Rights (ECR) office within 72 hours.
6. ADOT External Civil Rights (ECR) will forward all Title VI complaints to the FHWA Arizona Division Office.
7. The FHWA Arizona Division Office will forward all Title VI complaints to the FHWA Office of Civil Rights for processing and determination of the appropriate course of action.
8. If the FHWA Office of Civil Rights determines that a Title VI complaint against a subrecipient may be investigated by ADOT External Civil Rights, FHWA may delegate the investigation to ADOT ECR. Upon completion of the investigation, ADOT ECR will submit a Report of Investigation to the FHWA Office of Civil Rights for review and final disposition.
9. The final disposition of all FHWA Title VI complaints rests with the FHWA Office of Civil Rights. Complaints may be resolved through informal resolution or through the issuance of a Letter of Finding determining compliance or noncompliance with Title VI. A copy of the Letter of Finding will be provided to the FHWA Arizona Division Office.

Contact Information

Federal Highway Administration U.S. Department of Transportation

1200 New Jersey Avenue, SE

Washington, DC 20590

Email: CivilRights.FHWA@dot.gov

Phone: (202) 366-0693

Fax: (202) 366-1599

Arizona Department of Transportation External Civil Rights (ECR)

1801 West Jefferson Street, Suite 101, Mail Drop #154A

Phoenix, AZ 85007

Email: civilrightsoffice@azdot.gov

Phone: (602) 712-8946

City of Tucson Department of Transportation and Mobility (DTM)

To file a complaint or request assistance with filing a complaint with DTM, contact:

Kirshana Guy

Title VI Coordinator

Department of Transportation and Mobility

201 North Stone Avenue, 6th Floor (N)

Tucson, AZ 85701

Email: Kirshana.Guy@tucsonaz.gov

Phone: (520) 975-4151

<https://www.tucsonaz.gov/Departments/Transportation-Mobility/Title-VI-Civil-Rights>

DTM Complaint Intake and Processing

For the City of Tucson Department of Transportation and Mobility (DTM) to initiate the Title VI complaint process, a Title VI Discrimination Complaint Form must be completed. DTM staff are available to assist individuals with completing the complaint form and documenting the alleged discriminatory conduct.

To help ensure complaints are processed accurately and efficiently, the following information should be provided:

1. A written complaint signed by the complainant that includes the complainant's name, mailing address, telephone number, and other available contact information.
2. The date of the alleged discriminatory act, the date the complainant became aware of the alleged discrimination, or the date the alleged conduct ended, if applicable.
3. A detailed description of the alleged discrimination, including the names and positions of individuals involved, if known.
4. Complaints submitted by email or fax will be acknowledged and processed after the complainant's identity and intent to proceed have been verified. A signed copy of the complaint may be requested before processing begins.
5. Complaints submitted by telephone will be documented by DTM staff and provided to the complainant for review, correction, and signature before

processing.

DTM Complaint Review

Upon receipt of a completed Title VI Discrimination Complaint Form, the Title VI Coordinator will:

1. Log the complaint and review it for completeness.
2. Determine whether the complaint falls within DTM's jurisdiction.
3. If the complaint falls outside DTM's jurisdiction, the Title VI Coordinator will forward it to the appropriate agency and assist the complainant, as appropriate, in directing the complaint to the correct agency.
4. If the complaint falls within DTM's jurisdiction and involves FHWA-funded program or activity, forward the complaint to the Arizona Department of Transportation (ADOT) External Civil Rights (ECR) Office in accordance with FHWA Title VI procedures.

This process is consistent with the FHWA Title VI Complaint Process described in the preceding section.

Items That Do Not Constitute a Formal Complaint

The following generally are not considered formal Title VI complaints unless accompanied by a signed written statement specifically alleging discrimination based on race, color, or national origin under Title VI:

- Anonymous complaints that do not contain sufficient information for investigation.
- Requests for information or advice
- Courtesy copies of court pleadings.
- Newspaper or media articles.
- Courtesy copies of internal grievances.

Complaint Records

All Title VI complaint records and investigative files are maintained in a secure and confidential manner, consistent with applicable laws and City policies.

Complaint records are retained for a minimum of three (3) years. The Title VI Coordinator maintains the Title VI Complaint Log, while supporting documentation is organized and retained by complaint year and complaint number.

USDOT ORDER 1050.2A ASSURANCES

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. **Non-discrimination:** The contractor, with regard to the work performed 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 Subcontracts, 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 the 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 respect 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.

A

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 the **City of Tucson** 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* of 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 **City of Tucson** 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 **City of Tucson** 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 **City of Tucson**, its successors and assigns.

The **City of Tucson**, 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 (Title of Recipient) 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 **City of Tucson** 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 Non-discrimination covenants, **City of Tucson** 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 a deed, in the event of breach of any of the above Non-discrimination covenants, the **City of Tucson** 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 **City of Tucson** 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 **City of Tucson** 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 Non-discrimination covenants, **City of Tucson** 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, **City of Tucson** will there upon revert to and vest in and become the absolute property of **City of Tucson** 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 non-discrimination statutes and authorities; including but not limited to:

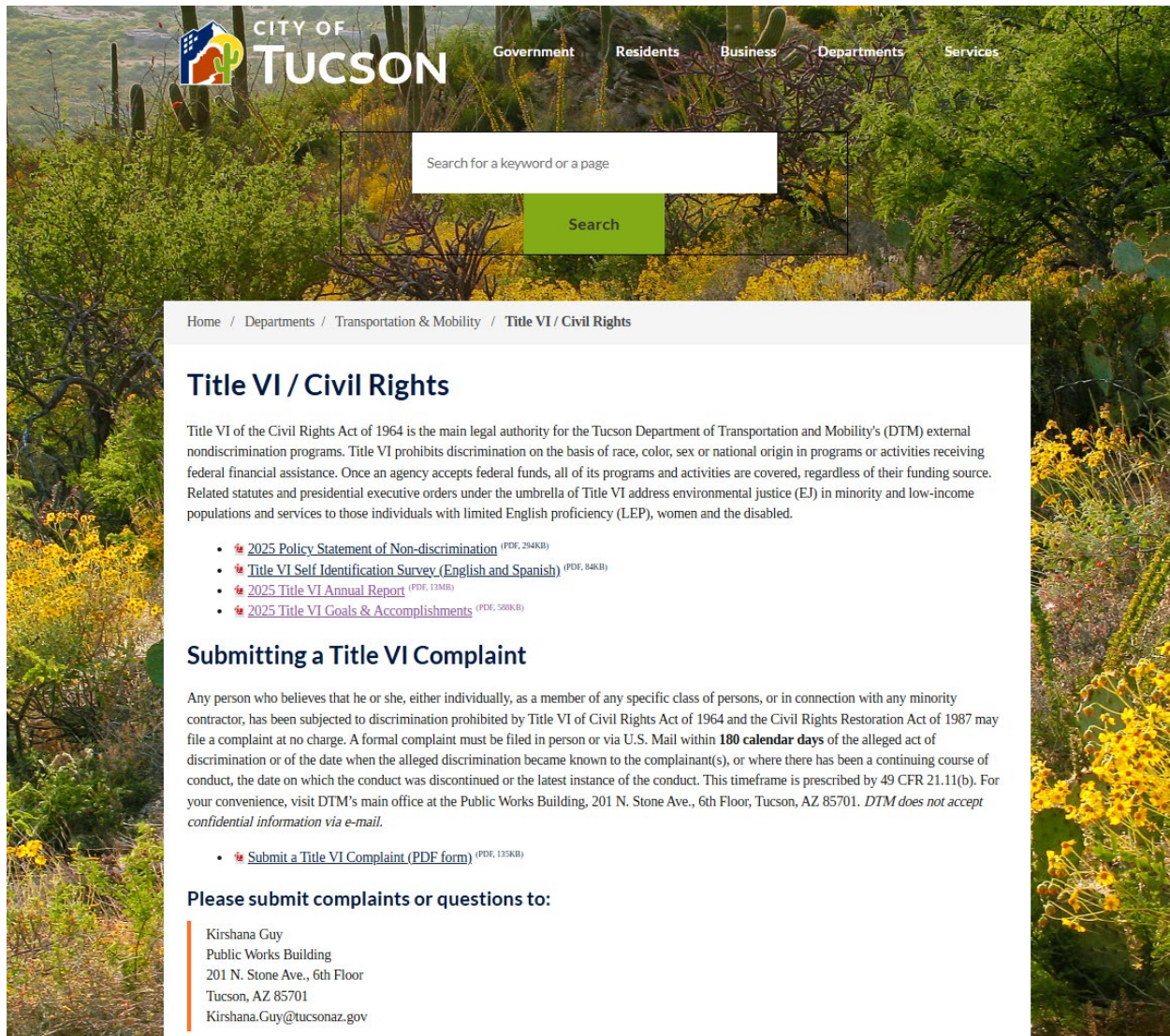
Pertinent Non-Discrimination Authorities:

- 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, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 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. 1681 et seq).

Appendix A – Title VI Online Resources & Complaint Form



The screenshot shows the City of Tucson website with a search bar and a navigation menu. The search bar contains the text "Search for a keyword or a page" and a green "Search" button. The navigation menu includes links for "Government", "Residents", "Business", "Departments", and "Services". The main content area is titled "Title VI / Civil Rights" and contains a paragraph about Title VI of the Civil Rights Act of 1964. Below the paragraph is a list of links to various documents, including the "2025 Policy Statement of Non-discrimination", "Title VI Self Identification Survey (English and Spanish)", "2025 Title VI Annual Report", and "2025 Title VI Goals & Accomplishments". The section "Submitting a Title VI Complaint" follows, with a paragraph explaining the process and a link to the "Submit a Title VI Complaint (PDF form)". The page concludes with contact information for Kirshana Guy, including her address and email.

**CITY OF
TUCSON**
TRANSPORTATION & MOBILITY

Government Residents Business Departments Services

Search for a keyword or a page

Search

Home / Departments / Transportation & Mobility / Title VI / Civil Rights

Title VI / Civil Rights

Title VI of the Civil Rights Act of 1964 is the main legal authority for the Tucson Department of Transportation and Mobility's (DTM) external nondiscrimination programs. Title VI prohibits discrimination on the basis of race, color, sex or national origin in programs or activities receiving federal financial assistance. Once an agency accepts federal funds, all of its programs and activities are covered, regardless of their funding source. Related statutes and presidential executive orders under the umbrella of Title VI address environmental justice (EJ) in minority and low-income populations and services to those individuals with limited English proficiency (LEP), women and the disabled.

- [2025 Policy Statement of Non-discrimination](#) (PDF, 254KB)
- [Title VI Self Identification Survey \(English and Spanish\)](#) (PDF, 64KB)
- [2025 Title VI Annual Report](#) (PDF, 13MB)
- [2025 Title VI Goals & Accomplishments](#) (PDF, 588KB)

Submitting a Title VI Complaint

Any person who believes that he or she, either individually, as a member of any specific class of persons, or in connection with any minority contractor, has been subjected to discrimination prohibited by Title VI of Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 may file a complaint at no charge. A formal complaint must be filed in person or via U.S. Mail within **180 calendar days** of the alleged act of discrimination or of the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct. This timeframe is prescribed by 49 CFR 21.11(b). For your convenience, visit DTM's main office at the Public Works Building, 201 N. Stone Ave., 6th Floor, Tucson, AZ 85701. *DTM does not accept confidential information via e-mail.*

- [Submit a Title VI Complaint \(PDF form\)](#) (PDF, 135KB)

Please submit complaints or questions to:

Kirshana Guy
Public Works Building
201 N. Stone Ave., 6th Floor
Tucson, AZ 85701
Kirshana.Guy@tucsonaz.gov



TRANSPORTATION & MOBILITY

Appendix B – Title VI Complaint Log

Department of Transportation & Mobility

Title VI Complaint Log

January 2025 - December 2026

[illegible]

Appendix C – City of Tucson Administrative Directive 2.01-1D



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY & CERTIFIED BILINGUAL PAY	NUMBER 2.01-1D	PAGE 1 of 3
	EFFECTIVE DATE November 11, 2022	

I. PURPOSE

To implement the Language Communication Skill Compensation Program established by the Mayor and Council (Tucson City Code [TCC] Section 10-33.1).

II. POLICY

Employees shall receive additional compensation per pay period in accordance with the Proficiency pay for certified as bilingual user of Language Communication Skill Compensation Program established by the Mayor and Council (TCC Section 10-33.1) and second language pay.

III. EMPLOYEES ELIGIBLE TO RECEIVE SECOND LANGUAGE PAY & CERTIFIED BILINGUAL PAY

A. Employees meeting the following language communication skills may be eligible to receive second language pay or certified bilingual pay, but not both:

1. Part-time, Full-time probationary, appointed or permanent employees who use a language other than English during the course of their job and while interacting with the public in the performance of their duties if approved by the department director; or
2. Who use a language other than English and occupy a position specifically designated for language skills compensation by a department director and approved by the Human Resources Director.
3. Must be available when called upon for translation services for any department needs or through the Limited English Program (LEP).

B. The following considerations must be addressed by department directors when justifying a need for a language skill compensation:

1. The reasons the operational needs of the department for communication with the public in languages other than English cannot be effectively met by employees who use and are compensated for using a language other than English.
2. Whether any interactions with the public in performance of the duties of the positions are significant to assigned duties, or only ancillary thereto.
3. It is a benefit to the City to have employees who can be called upon for translation services.



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY & CERTIFIED BILINGUAL PAY	NUMBER 2.01-1D	PAGE 2 of 3
	EFFECTIVE DATE November 11, 2022	

IV. ADMINISTRATION OF SECOND LANGUAGE PAY PROGRAM & CERTIFIED BILINGUAL PAY

Administration of this program is the responsibility of the Human Resources Department, and involves the following:

- A. For Second Language Pay-Confirmation of the conversational proficiency related to the services provided by a designated representative of the Human Resources Department.
- B. For Certified Bilingual Pay-Confirmation of an approved pass from a third-party vendor selected and under the guidance of the Human Resources Director.
- C. Processing of a written request (hard copy or electronic) necessary to add or delete participants from the program, as required, based on changes in work assignments.
- D. Subject to annual confirmation both programs may require additional retesting if complaints/concerns arise of the lack of fluency in the course of performing the job.
- E. Employees who transfer, promote or demote to different work assignments may continue to receive the additional compensation unless it is no longer a benefit to the City.
- F. Refusal to assist in translation services when called upon, may result in removal of the Certified Second Language Pay.
- G. Employees on leave without pay for greater than 10 (ten) working days, including employees on Family Medical Leave (FML) or Military Leave, will not receive language skill compensation pay. Language skill compensation pay may be reinstated upon return to work, with compensation to resume during the first full pay period after the employee has returned to work, provided that all other program requirements are met.
- H. Certified Bilingual Testing will be allowed once a year for employees. If an employee fails to secure a passing score, employee will wait one year before retesting, however they may test for the second language pay.

V. PAY RATES:

Employee Group	Amount per Pay Period
Second Language Pay	\$30.00
Certified Bilingual Pay	\$100.00



CITY OF TUCSON

TRANSPORTATION & MOBILITY



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY & CERTIFIED BILINGUAL PAY	NUMBER	PAGE
	2.01-1D	3 of 3
	EFFECTIVE DATE November 11, 2022	

Forms (Attached to
AD 2.01-1) None

References Tucson City Code Chapter 10

**Review Responsibility and
Frequency** The Human Resources Director will review this directive annually, based
on date of publication.

Authorized



City Manager
Michael J. Ortega



Date

Appendix D – City of Tucson Administrative Directive 2.05-9



ADMINISTRATIVE DIRECTIVE

SERVICES FOR LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY (LEP)	NUMBER	PAGE
	2.05-9	1 of 3
	EFFECTIVE DATE January 1, 2018	

I. PURPOSE

To set forth procedures for providing meaningful language access to limited English proficient customers to all City of Tucson programs, services and/or activities.

II. POLICY

It is the policy of the City of Tucson to ensure that all departments are in compliance with Title VI of the Civil Rights Act of 1964. Title VI prohibits exclusion from participation in, denial of benefits of, and discrimination under any federally assisted program or activity on the grounds of race, color, or national origin, 42 U.S.C. § 2000d. The term program or activity means “all of the operations of a department, agency, special purpose district, or other instrumentality of a state or of a local government.” 42 U.S.C. § 2004d-4a. When a city department receives federal financial assistance for a particular purpose, all operations of the department are covered by Title VI, not just the part of the department that uses federal assistance.

To ensure compliance with this Administrative Directive, in July of every year, each department shall appoint a Limited English Proficiency (LEP) Liaison and notify the Office of Equal Opportunity Programs (OEOP) within the City Manager's Office of the appointment and/or any subsequent change in assignment.

III. DEFINITIONS

- A. **Limited English Proficiency** – Refers to persons who do not speak English as their native/primary language and who have a limited ability to read, speak, write and/or understand English.
- B. **Meaningful Access** – Meaningful access to programs and services is the standard of access required of federally funded entities to comply with Title VI language access requirements. LEP customers must be able to reasonably access available resources, services, and activities at no additional cost.

IV. LIAISON ROLES AND RESPONSIBILITIES

- A. Ensure that departmental staff and the general public know how to contact the department's LEP Liaison. Contact information should be included on the departmental Web site, and in any departmental directory.
- B. Complaints should be directed to OEOP for response.
- C. Attend and schedule other appropriate staff for attendance at LEP Liaison meetings and training sessions.
- D. Serve as a departmental resource for LEP information.
- E. Assess and identify the need for LEP compliance and awareness training within the department and coordinate the necessary training for departmental personnel with OEOP.



ADMINISTRATIVE DIRECTIVE

SERVICES FOR LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY (LEP)	NUMBER	PAGE
	2.05-9	2 of 3
	EFFECTIVE DATE January 1, 2018	

V. DEPARTMENT DIRECTOR ROLES AND RESPONSIBILITIES

Each department director is responsible to ensure that the following areas of LEP compliance are assigned to the department's LEP Liaison or other appropriate departmental staff.

- A.** Coordinates language interpreter services to ensure meaningful access to the department's programs, services, and activities (see Attachment A).
- B.** Determine departmental vital documents, and provide them in languages based on the LEP population to be served by the department.
- C.** Ensures that all meeting notices that provide information on city services, programs and activities that are open to the public conducted by the department contain the following statement:

"If you require a foreign language interpreter or materials in a language other than English, please call (include the name and telephone number of the responsible departmental person) at least five business days in advance."
- D.** Ensures that the department maintains copies of the "I Speak" cards at appropriate customer service areas (see Attachment B).
- E.** Develop and maintain a Standard Operating Procedure (SOP), based on the programs, services and activities offered by the department to ensure that meaningful access is afforded to its LEP customers in compliance with this policy. On an annual basis, each department shall forward departmental SOPs to OEOP.
- F.** Each departmental SOP shall include, but not be limited to, the Four Factor Analysis to assist with identifying LEP persons who may require assistance to each department's programs, services and activities.

The Four Factor Analysis shall include:

- a.** The number of proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee/recipient;
- b.** The frequency with which LEP individuals come in contact with the program;
- c.** The nature and importance of the program, activity, or service provided by the program to people's lives; and
- d.** The resources available to the grantee/recipient and costs.



ADMINISTRATIVE DIRECTIVE

SERVICES FOR LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY (LEP)	NUMBER	PAGE
	2.05-9	3 of 3
	EFFECTIVE DATE	
	January 1, 2018	

VI. OEOP ROLE AND RESPONSIBILITIES

- A. OEOP shall provide guidance and assistance to all city departments, their administration, their LEP Liaisons and other appropriate staff regarding the requirements of Title VI, state law and city ordinance as well as other issues related to meaningful access for LEP customers.
- B. OEOP shall report to the City Manager any action, or lack of action, on the part of city departments that affects the city's compliance with Title VI.

Attachments

A – Translation and Interpretation Services
B – "I Speak" Flash Card

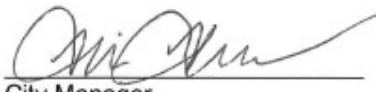
References

None.

**Review Responsibility
and Frequency**

The Director of the Office of Equal Opportunity Programs will review this directive annually or as needed. Last review date: July 2024.

Authorized


 City Manager


 Date

Timothy Thomure



MEMORANDUM

Date: August 15, 2005

To: All Departments and Divisions

From: Wayne A. Casper, C.P.M.
Director of Procurement

Subject: Translation and Interpretation Services
Contract No. 041090

The design and intent of the Translation/Interpretation contract is to provide for translation and interpretations services for City departments. Services include, but are not limited to: written and oral translation and interpretation of Spanish and exotic languages, signing for the hearing impaired, and Braille, large print and audio cassette conversion for the visually impaired.

There are two Contractors supplying services under this contract: Asturias Language Interpreters who provides language and vision-related services, and Catholic Community Service of Southern Arizona dba Community Outreach Program for the Deaf COPD who provides hearing-related services.

It is the responsibility of each using department to determine who within the department has authorization to request and make arrangements for these services. To request translation/interpretation services, contact:

LANGUAGES/VISUAL

Asturias Language Interpreters
Fernando Herran
545 E. University Boulevard
(520) 624-9941
CityWide PO# 21219

HEARING

CCS
Interpreting Department
268 W. Adams Street
(520) 792-1906
CityWide PO# 21220

SAMPLE RATES:

Written to/from Spanish/English	\$.10/word
Written to/from English/Exotic	\$.12/word
Oral Spanish	\$30.00/hour
Oral Exotic	\$35.00/hour
Braille conversion	\$35.00/page
Large print conversion	\$35.00/page
Audio cassette conversion	\$ 3.00/minute

SAMPLE RATES:

Sign language interpreter
\$40.00 per hour per interpreter
Two hour minimum

The referenced purchase order numbers are effective through the life of the contracts. The current contract term is September 1, 2005 through August 31, 2006. Should you have any questions regarding translation and interpretation services, please contact Christina Schipansky at 791-4400 x 131.

c: Marcheta Gillespie, Contract Administrator
Christina Schipansky, Senior Contract Officer
Procurement Liaisons

Appendix E – Language Identification Flashcard



Attachment B

AD 2.05-9

Language Identification Flashcard ✓

☐ Arabic	أنا أتحدث اللغة العربية
☐ Armenian	Ես խոսում եմ հայերեն
☐ Bengali	আমী বাংলা কথা বোলতে পারী
☐ Cambodian	ខ្ញុំនិយាយភាសាខ្មែរ
☐ Chamorro	Motka i kahhon ya yangin ñntúngu' manaitai pat ñntúngu' kumentos Chamorro
☐ Dinka	Rirp êkênê yic të yijam në thunjäy ye tök, ku kor raan Bi yi geer thok.
☐ Simplified Chinese	如果你能读中文或讲中文，请选择此框。
☐ Traditional Chinese	如果你能讀中文或講中文，請選擇此框。
☐ Croatian	Govorim hrvatski
☐ Czech	Mluvím česky
☐ Dutch	Ik spreek het Nederlands
☐ English	I speak English

Language Identification Flashcard ✓

☐ Farsi	من فارسی صحبت می کنم
☐ French	Je parle français
☐ German	Ich spreche Deutsch
☐ Greek	Μιλώ τα ελληνικά
☐ Haitian Creole	M pale kreyòl ayisyen
☐ Hindi	मैं हिंदी बोलता हूँ ।
☐ Hmong	Kuv has lug Moob
☐ Hungarian	Beszélek magyarul
☐ Ilocano	Agsaonak ti Ilokano
☐ Italian	Parlo italiano
☐ Japanese	私は日本語を話す
☐ Korean	한국어 합니다

Language Identification Flashcard ✓

☐ Laotian	ຂ້ອຍປາກພາສາລາວ
☐ Polish	Mówię po polsku
☐ Portuguese	Eu falo português do Brasil <i>(for Brazil)</i>
☐ Portuguese	Eu falo português de Portugal <i>(for Portugal)</i>
☐ Romanian	Vorbesc românește
☐ Russian	Я говорю по-русски
☐ Serbian	Ja говорим српски
☐ Slovak	Hovorím po slovensky
☐ Spanish	Yo hablo español
☐ Somali	Waxaan ku hadlaa af-Soomaali
☐ Tagalog	Marunong akong mag-Tagalog
☐ Thai	พูดภาษาไทย

Language Identification Flashcard ✓

☐

Tongan

Maaka 'i he puha ni kapau 'oku ke lau
pe lea fakatonga

☐

Ukrainian

Я розмовляю українською мовою

☐

Urdu

میں اردو بولتا ہوں

☐

Vietnamese

Tôi nói tiếng Việt

☐

Yiddish

איך רעד יידיש

☐

American Sign Language



I, ME



SIGN, SIGN LANGUAGE



Appendix F – Self-Identification Survey Cards

Front of Card
(Printed on Card Stock)

Back of Card

SELF-IDENTIFICATION SURVEY

Thank you for attending this public meeting.
Please take a few minutes to help us provide
you with more meaningful services.

*Completing this survey is voluntary. If you choose
to respond, please mark all that apply.*

ETHNICITY/RACE:

- ☐ African American/Black
- ☐ American Indian/Alaskan Native
- ☐ Hawaiian/Other Pacific Islander Asian
- ☐ Hispanic/Latino
- ☐ White
- ☐

AGE:

- ☐ Under 20
- ☐ 21-39
- ☐ 40-64
- ☐ 65+

SEX:

- ☐ Female
- ☐ Male

The Tucson Department of Transportation and Mobility's (DTM) goal is to ensure that every effort will be made to prevent discrimination through the impact of its programs, policies, and activities.

DTM will take reasonable steps to provide accommodations based on language or disability. Requests should be made as early as possible to ensure DTM has an opportunity to address the accommodation.

By completing this voluntary survey, DTM will be able to determine who attends its public meetings and how the department can improve participation. The survey will also help DTM fulfill federal reporting requirements.

TITLE VI – KNOW YOUR RIGHTS

Title VI of the 1964 Civil Rights Act, as amended, 42 USC 2000d, and U.S. Department of Transportation regulations provide 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."

Title VI authorities:

- Federal-Aid Highway Act of 1973
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act of 1990
- Executive Orders 12898 & 13166

Thank you! Your input is appreciated.

tucsonaz.gov

ENCUESTA PARA IDENTIFICARSE

Gracias por participar en esta reunión pública.
Por favor tómese unos minutos para ayudarnos
a darle lo mas mejor servicios posible.

*El completar esta encuesta es voluntaria. Si usted
decide responder, por favor marque todas las
respuestas que le corresponden.*

ETNICIDAD/RAZA:

- ☐ Afroamericano/Negro
- ☐ Amerindio/Nativo de Alaska
- ☐ Nativo de Hawái u Otra Isla del Pacífico
- ☐ Asiático
- ☐ Hispano/Latino
- ☐ Caucásico/Blanco

EDAD:

- ☐ Menos de 20
- ☐ 21-39
- ☐ 40-64
- ☐ 65+

SEXO:

- ☐ Femenino
- ☐ Masculino

El objetivo del Departamento de Transporte y Movilidad de Tucson (DTM) es asegurar que cada esfuerzo se lleve a cabo para prevenir discriminación en el desarrollo de sus programas, políticas y actividades.

DTM también tomará todas las medidas razonables para ofrecer el acceso a servicios y actividades para personas con limitaciones ya sea por el idioma o por discapacidad. Las solicitudes deben hacerse lo más pronto posible para asegurar que el equipo encargado del proyecto tenga la oportunidad de hacer los arreglos necesarios.

Con su participación en esta encuesta voluntaria, DTM podrá determinar quien participa en las reuniones públicas y como podrá mejorar la participación de miembros de minorías. La encuesta también le ayudará a DTM a cumplir con requisitos federales.

TITULO VI – SEPA SUS DERECHOS

El Título VI del Acto de Derechos Civiles, la ley 42 USC 2000d y otros reglamentos del Departamento de Transporte de los Estados Unidos, aseguran que "ninguna persona en los Estados Unidos será negada los beneficios de o será discriminado de cualquier programa o actividad que recibe asistencia de fondos federales por su raza, color de su origen nacional".

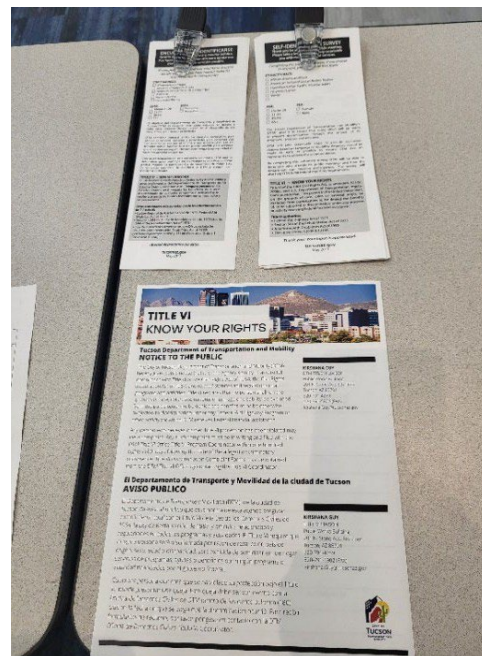
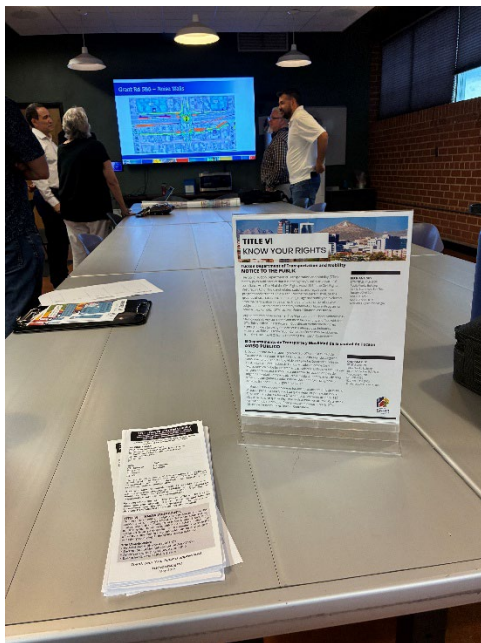
Otras autoridades relacionadas con la No-Discriminación de Título VI:

- La Ley Federal de Asistencia Vial de 1973 (Federal-Aid Highway Act of 1973)
- Sección 504 de la Ley de Rehabilitación de 1973 (Section 504 of the Rehabilitation Act of 1973)
- Ley de ciudadanos Americanos con Discapacidades de 1990 (Americans with Disabilities Act of 1990)
- Ordenes Ejecutivas 12898 y 13166 (Executive Orders 12898 and 13166)

¡Gracias! Apreciamos sus datos.

tucsonaz.gov

Appendix G – Required Set Up for Public Meetings



Appendix H – Checklist and Data Collection for Public Meetings

Public Meeting Preparation Checklist: This form is to be filled out prior to a public meeting, whether virtual or in-person, such as town hall meetings, open house meetings, or community events. Once the meeting has ended, return this filled out form to Kirshana Guy, along with all Title VI surveys within 14 days of the event.

Project Name:

Project Manager:

Purpose of Meeting:

Date & Time:

Location:

Prior to the Meeting:

- ☐ Ensure paper mailings and online postings include the required statement “If you require a foreign language interpreter...”
- ☐ Document any requests for accommodation and notify Kirshana Guy
- ☐ Review Demographics surrounding the project area on Remix and through census data, and provide all materials and vital documents in languages based on languages used by the population in the area
- ☐ Contact Kirshana Guy to arrange notifications with the media and online/social media
- ☐ Estimate the total number of attendees based on attendance at similar events, and print brochures and surveys

During the Meeting:

- ☐ Display Title VI Brochures and Posters at entrance or sign-in table
- ☐ Provide printed surveys and ask participants to fill out the surveys after signing in
- ☐ Count the total number of attendees

After the Meeting:

- ☐ Return this form to Kirshana Guy along with all collected Title VI surveys.

Analysis:

After each public outreach event, the information collected from the surveys will be tallied up and compared to base demographic data available in the project area. DTM staff will input this information on the table below to determine where discrepancies may exist. If there are discrepancies, the city will develop a report with a list of action items to improve representation that reflects the local community.

Data Comparisons Table

	Event % if Pop. 65+	Area % of Pop. 65+	Event % of Pop. 17-	Area % of Pop. 17-	Area Race & Demographic Breakdown	Event % Female, Male
Discrepancy						

Appendix I – Sample Data Collection for Annual Title VI Report

Project Name	Status	Project Manager	Date	Approx. Attendance	# of Survey Cards Returned	African American	American Indian	Asian/Pacific Islander	Hispanic/Latino	White	Other	Female	Male	No Response	Age: Under 20	Age: 21-39	Age: 40-64	Age: 65+
Drexel Road Modernization Open House #2	In-person	Patrick Hartley	9/29/2025		10	0	0	0	0	0	0	0	0	0	0	0	0	0
36th St Public Open House #1	In-person	Patrick Hartley	9/25/2025		15	0	0	0	0	0	0	0	0	0	0	0	0	0
36th St Public Open House #2	In-person	Patrick Hartley	9/27/2025		15	0	0	0	0	0	0	0	0	0	0	0	0	0
1st Avenue Public Open House #2	In-person	Patrick Hartley	10/15/2025		46	4	0	0	0	2	2	0	3	0	1	0	1	2
Ward 2 / Ward 4 Joint Public Open House	In-person	Lindsey Salcido	2/9/2026		40	1	1	0	0	0	0	0	1	0	0	0	0	1
Glenn St. Safety and Pedestrian Walkability	In-person	Lee Miller	6/25/2025		30	0	0	0	0	0	0	0	0	0	0	0	0	0
Glenn St. Safety and Pedestrian Walkability	In-person	Lee Miller	6/27/2025		40	0	0	0	0	0	0	0	0	0	0	0	0	0

Appendix J – DTM Employees Receiving Second Language Pay

The administration of this program is the responsibility of the Human Resources Department, and involves the following:

For Certified Bilingual Pay – Confirmation of an approved pass from a third-party vendor selected and under the guidance of the Human Resources Director. Certified Bilingual Testing will be allowed once a year for employees. Certified Bilingual Pay equates to \$100.00 per Pay Period.

For Second Language Pay – Confirmation of the conversational proficiency related to the services is provided by a designated representative of the Human Resources Department. Second Language Pay equates to \$30.00 per Pay Period. DTM had 28 employees receiving language proficiency pay.

Functional Area within DTM	Number of Employees Receiving Language Proficiency Pay
Administration & Executive Support	4
Engineering & Project Development	2
Permits, Inspections & Right-of-Way	3
Neighborhood & Traffic Programs	2
Street Maintenance Operations	7
Traffic Operations & Safety	3
Traffic Control Devices	4
Transit	1
Customer Service Representatives	2
Total	26

DTM Employees Receiving Bilingual Pay

Certified Bilingual Pay

Abelardo Rosales	Smart Mobility
Adrian Olpineda	Street Maintenance
Alejandro Borboa	Street Maintenance
Andrea Altamirano	Traffic Administration
Andrew Bemis	Deputy Director
Angel Flores	Field Engineering
Carlos Nido	Engineering
Cristina Lespron	Customer Service Representative
Eddie Ledezma	Street Maintenance
Eric Jacobo	Engineering
Faustino Acosta	Traffic Maintenance
Jorge Valenzuela	Traffic Maintenance
Jose Cazares	Engineering
Jozett Aguirre	Traffic Administration
Juan Mancilla	Engineering
Juan Torres	Street Maintenance
Juan Verduzco	Street Maintenance
Manuel Fernandez	Street Maintenance
Marcos Monteverde	Traffic Maintenance
Marcos Torres	Engineering
Maria Acosta	Customer Service Representative
Martin Navarro	Signal and Street Light Maintenance
Melissa Romano	Administrative
Miguel Rodas	Street Maintenance
Monica Landgrave Serrano	Planning and Programming
Omar Reyes	Street Maintenance
Ricardo Gonzales	Field Engineering
Robert Carrasco	Traffic Engineering

Appendix K – Sample Brochures and Know Your Rights Poster



Tucson Department of Transportation and Mobility NOTICE TO THE PUBLIC

The City of Tucson Department of Transportation and Mobility (DTM) 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 DTM 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 DTM Title VI Office 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 the DTM Title VI Office by contacting the Title VI Coordinator.

El Departamento de Transporte y Movilidad de la ciudad de Tucson AVISO PUBLICO

El Departamento de Transporte y Movilidad (DTM) de la ciudad de Tucson da aviso al publico que es la norma de esta agencia asegurar cumplimiento total con el Título VI de la Ley de los Derechos Civiles de 1964, la Ley de Restauración de 1987, y articulos relacionados y regulaciones en todos los programas y actividades. El Título VI require que ninguna persona será discriminada por razón de raza, color, país de origen, sexo, edad o discapacidad; será excluida de participar en, de negar servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

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



KIRSHANA GUY

DTM TITLE VI Coordinator
Public Works Building
201 N. Stone Ave. 6th Floor
Tucson, AZ 85701
520-975-4151
520-791-5902 (FAX)
Kirshana.Guy@tucsonaz.gov



KIRSHANA GUY

TITLE VI Coordinator
Public Works Building
201 N. Stone Ave. 6th Floor
Tucson, AZ 85701
520-975-4151
520-791-5902 (FAX)
Kirshana.Guy@tucsonaz.gov



TUCSON DEPARTMENT OF TRANSPORTATION & MOBILITY COMPLAINT OF TITLE VI & ADA DISCRIMINATION

Tucson Department of Transportation and Mobility (DTM), as a recipient of federal financial assistance, is required to ensure that its services and related benefits are distributed in a manner consistent with Title VI of the Civil Rights Acts of 1964, as amended. Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination under Title VI, on the basis of race, color, or national origin, may file a written complaint with DTM. We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know. Submit your signed complaint and any attachments to:

KIRSHANA GUY
DTM TITLE VI COORDINATOR
201 N. Stone Ave, 6th Floor, Tucson, AZ 85701
520-975-4151 (PHONE), 520-791-5902 (FAX)
Kirshana.Guy@tucsonaz.gov

Departamento de Transporte de Tucson y MOVILIDAD (DTM), como recipiente de ayuda financiera federal, es requerida a asegurar que sus servicios y servicios relacionados son distribuidos de una manera consistente con el Título VI de la ley de los Derechos Civiles de 1964, con sus enmendadas. Si usted cree que, individualmente o como parte de una clase específica de personas, ha sido discriminado bajo el Título VI, basado en su raza, color, o nacionalidad, puede presentar una queja escrita con DTM. Le pedimos la siguiente información para poder procesar su queja. Si necesita ayuda para llenar este formulario, por favor, pónganse en contacto con DTM. Entregue el formulario con su firma y páginas adicionales a:

KIRSHANA GUY
DTM TITLE VI COORDINATOR
201 N. Stone Ave, 6th Floor, Tucson, AZ 85701
520-975-4151 (PHONE), 520-791-5902 (FAX)
Kirshana.Guy@tucsonaz.gov

1. COMPLAINANT INFORMATION / RECLAMANTE INFORMACIÓN

Name/Nombre

Street Address/Dirección

City/Ciudad

State/Estado

Zip/Código Postal

Telephone/Numero de Teléfono

Email Address/Dirección de Correo Electrónico

2. PERSON DISCRIMINATED AGAINST / PERSONA QUE FUE DISCRIMINADA

Name/Nombre

Street Address/Dirección

City/Ciudad

State/Estado

Zip/Código Postal

Telephone/Numero de Teléfono

Email Address/Dirección de Correo Electrónico

3. WHICH OF THE FOLLOWING BEST DESCRIBES THE REASON YOU BELIEVE THE DISCRIMINATION TOOK PLACE?:
EN SU OPINIÓN, ¿EN QUE SE BASARON ESAS ACCIONES DISCRIMINATORIAS?:

- ☐ Race / Raza (Specify / Especifique) _____
- ☐ Disability / Incapacidad - Impedimento (Specify / Especifique) _____
- ☐ Color / Color (Specify / Especifique) _____
- ☐ National Origin / Nacionalidad (Specify / Especifique) _____

4. DATE OF ALLEGED DISCRIMINATION / FECHA DE LA SUPUESTA DISCRIMINACIÓN: _____

5. IN THE SPACE BELOW, PLEASE DESCRIBE THE ALLEGED DISCRIMINATION.

(Explain what happened and who you believe was responsible. Include names, contact information of persons who may have knowledge of the alleged discrimination. If additional space is needed, add a piece of paper.)

EN EL ESPACIO ABAJO, DESCRIBA EL SUPUESTO ACTO DE DISCRIMINACIÓN.

(Explique lo más claro posible lo que pasó y quien usted piensa es el responsable por el supuesto acto. Incluye los nombres de las personas que puedan tener conocimiento del supuesto acto y cómo contactarlas. Si necesita espacio adicional, agregue una hoja de papel.)

6. HAVE YOU FILED A COMPLAINT OF THE ALLEGED DISCRIMINATION WITH A FEDERAL, STATE, OR LOCAL AGENCY, OR WITH A STATE OR FEDERAL COURT? / ¿HA PRESENTADO USTED (O LA PERSONA QUE FUE DISCRIMINADA) LA QUEJA ANTE UNA AGENCIA DEL GOBIERNO FEDERAL, ESTATAL, O LOCAL? ¿O ANTE LA CORTE ESTATAL O FEDERAL?

- ☐ Yes / Sí ☐ No / No

If yes, check all that apply / por favor marque las respuestas que la corresponden:

- ☐ Federal / Federal (Specify / Especifique) _____ ☐ Federal Court / La Corte Federal (Specify / Especifique) _____
- ☐ State / Estatal (Specify / Especifique) _____ ☐ State Court / La Corte Estatal (Specify / Especifique) _____
- ☐ Local / Local (Specify / Especifique) _____

PLEASE PROVIDE THE NAME OF THE AGENCY WHERE YOU FILED YOUR COMPLAINT / ¿ANTE QUÉ AGENCIA USTED PRESENTÓ LA QUEJA?

Agency / Agencia: _____ Agency Contact / Nombre del investigador o representante: _____

7. WHAT WOULD YOU CONSIDER AN APPROPRIATE RESPONSE TO YOUR COMPLAINT? / ¿CUÁL CONSIDERARÍA USTED UNA RESPUESTA ADECUADA A SU QUEJA?:

8. PLEASE SIGN BELOW. YOU MAY ATTACH ANY ADDITIONAL INFORMATION YOU THINK IS RELEVANT. / POR FAVOR, FIRME EL FORMULARIO. ADJUNTE CUALQUIER INFORMACIÓN ADICIONAL QUE USTED CREE ES PERTINENTE CON SU QUEJA.

Signature of Complainant / Firma del reclamante

Date / Fecha



What Programs are covered?

Federally assisted programs include any highway, project, program or activity for the provision of services and for other benefits. Such programs include education or training, work opportunities, health, welfare, rehabilitation, housing or other services, whether provided directly by DTM or indirectly through contracts or other arrangements with other agents.



For Questions or to file a complaint, contact:

Kirshana Guy

Title VI Coordinator

201 N Stone Avenue, 6th floor

Tucson, AZ 85701

520-975-4151

Kirshana.Guy@tucsonaz.gov

Upon receipt, the Title VI Coordinator will determine which agency has jurisdiction to handle the complaint. If DTM does not have jurisdiction to handle the complaint, it will be forwarded to the appropriate agency. The allegations will be investigated and an attempt will be made to resolve any violations, if found. If efforts to resolve any violations are unsuccessful, enforcement proceedings may be initiated to bring the recipient into compliance



CITY OF
TUCSON
TRANSPORTATION &
MOBILITY

TITLE VI KNOW YOUR RIGHTS

The City of Tucson, Department of Transportation and Mobility (DTM) assures that no person on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any sponsored program or activity. There is no distinctions between the sources of funding.

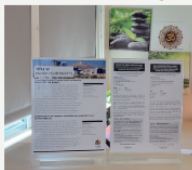
01. What is Title VI?

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals and groups from discrimination on the basis of their race, color or national origin in programs, services or activities that receive federal financial assistance. However, the Federal Highway Administration's (FHWA) reference to Title VI includes other civil rights provisions of federal statutes and related authorities to the extent that they prohibit discrimination in programs, services and activities receiving federal financial assistance.

DTM's Title VI Policy 02.

Pursuant to Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, it is the policy of the Department of Transportation and Mobility (DTM) that no person shall on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied benefits of, or otherwise be subjected to discrimination under any sponsored program or activity. There is no distinction of funding.

Every effort will be made by DTM to prevent discrimination through the impacts of DTM's programs, policies, and activities.



What type of discrimination is prohibited under DTM's Title VI Program?

Discrimination in DTM's Title VI program includes any actions, intentional or unintentional, that result in unequal treatment based on race, color, national origin, sex, age, disability, or retaliation, limiting access to services. DTM cannot discriminate either directly or through contractual or other means, including:

- Denying services or benefits
- Offering different services or benefits
- Segregating individuals or groups
- Restricting enjoyment of privileges
- Denying participation in planning or advisory roles
- Offering different participation opportunities in programs or services

Who may file a Title VI Complaint?

A Title VI complaint may be filed by any individual or individuals who allege they have been subjected to discrimination or adverse impact under any DTM program, service, or activity based on race, color, national origin, sex, age, disability or retaliation. To file a complaint, visit DTM's Title VI / Civil Rights to access the PDF Form.

Upon request, assistance will be provided for those whose primary language is not English or who have disabilities. Any complaint may be filed using an alternate format.



Title VI Compliance

Title VI compliance is a situation where DTM has effectively implemented all the Title VI requirements, or can demonstrate that every good faith effort has been made toward achieving this end. As a subrecipient of federal highway funds, DTM is required to prevent discrimination and ensure nondiscrimination in all programs and activities, whether they are federally funded or not.





Programas incluidos

Los programas asistidos federalmente incluyen cualquier carretera, proyecto, programa o actividad para la provisión de servicios y otros beneficios. Dichos programas incluyen educación o capacitación, oportunidades laborales, salud, bienestar, rehabilitación, vivienda u otros servicios, ya sea proporcionados directamente por DTM o indirectamente a través de contratos u otros arreglos con otros agentes.



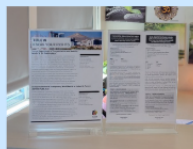
01. ¿Qué es el Título VI?

El Título VI de la Ley de Derechos Civiles de 1964 es la ley federal que protege a individuos y grupos de la discriminación basado en su raza, color u origen nacional en programas, servicios o actividades que reciben asistencia financiera federal. Sin embargo, la referencia de la Administración Federal de Carreteras (FHWA) al Título VI incluye otras disposiciones de derechos civiles de los estatutos federales y autoridades relacionadas en la medida en que prohíban la discriminación en programas, servicios y actividades que reciben asistencia financiera federal.

Política del Título VI de DTM

En conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y otras autoridades de no discriminación, es política del Departamento de Transporte y Movilidad (DTM) que ninguna persona, basado en su raza, color, origen nacional, sexo, edad o discapacidad, sea excluida de participar en, se le nieguen beneficios de, o de otra manera sea objeto de discriminación en cualquier programa o actividad patrocinada. No hay distinción en entre las fuentes de financiamiento.

DTM hará todo lo posible para prevenir la discriminación a través de los impactos de sus programas, políticas y actividades.



Para preguntas o para presentar una queja, comuníquese con:

Kirshana Guy

Título VI Coordinator

201 N Stone Avenue, 6th floor

Tucson, AZ 85701

520-975-4151

Kirshana.Guy@tucsonaz.gov

Al recibir la queja, el Coordinador del Título VI determinará qué agencia tiene jurisdicción para manejarla. Si DTM no tiene jurisdicción para atenderla la queja, será remitida a la agencia correspondiente. Las acusaciones serán investigadas y se intentará resolver cualquier violación, si se encuentra alguna. Si los esfuerzos para resolver las violaciones no tienen éxito, se podrán iniciar procedimientos de ejecución para que el destinatario cumpla con las normas.

¿Qué tipo de discriminación está prohibida bajo el Programa del Título VI de DTM?

La discriminación en el programa del Título VI de DTM incluye cualquier acción, intencional o no, que resulte en un trato desigual basado en la raza, color, origen nacional, sexo, edad, discapacidad o represalias, limitando el acceso a servicios. DTM no puede discriminar, ya sea directamente o a través de medios contractuales u otros, incluyendo:

- Negar servicios o beneficios
- Ofrecer servicios o beneficios diferentes
- Segregar a individuos o grupos
- Restringir el goce de privilegios
- Negar la participación en roles de planificación o asesoría
- Ofrecer diferentes oportunidades de participación en programas o servicios

¿Quién puede presentar una queja bajo el Título VI?

Una queja bajo el Título VI puede ser presentada por cualquier individuo o grupo de individuos que aleguen haber sido objeto de discriminación o impacto adverso en cualquier programa, servicio o actividad de DTM basados en su raza, color, origen nacional, sexo, edad, discapacidad o represalias. Para presentar una queja, visite la página de Derechos Civiles / Título VI de DTM para acceder al formulario en PDE

Si lo solicita, se brindará asistencia si tiene un dominio limitado del inglés o una discapacidad. Cualquier queja puede ser presentada en un formato alternativo.



CITY OF
TUCSON
TRANSPORTATION &
MOBILITY

TÍTULO VI Conoce Tus Derechos

El Departamento de Transporte y Movilidad de la Ciudad de Tucson (DTM) asegura que ninguna persona, por motivos de raza, color, origen nacional, sexo, edad o discapacidad, sea excluida de participar en, se le nieguen los beneficios de, o sea sometida a discriminación en ningún programa o actividad patrocinada.

No hay distinciones entre las fuentes de financiamiento.



Cumplimiento del Título VI

El cumplimiento del Título VI es una situación en la que DTM implemente efectivamente todos los requisitos del Título VI, o puede demostrar que se ha hecho todo esfuerzo de buena fe para lograr este objetivo. Como subreceptor de fondos federales para carreteras, DTM está obligado a prevenir la discriminación y asegurar la no discriminación en todos los programas y actividades, ya sean financiados con fondos federales o no.



Appendix L – Screenshot of Multilingual DTM Website

Home / Departments / Transportation & Mobility / DTM Projects & Programs / Slow Down. Save Lives.

Slow Down. Save Lives.

City of Tucson: *Traffic Safety Campaign*



Speed is the #1 contributing factor in deadly crashes.
1 in 3 Tucsonans killed in crashes are pedestrians.
79% of deadly motorcycle collisions occur at intersections.

At the Department of Transportation and Mobility (DTM), we have made — and are continuing to make — thoughtful, data-driven adjustments to road design that improve the safety of everyone traveling in our streets. We're reprogramming traffic signals, adding protected bike lanes, and connecting gaps in sidewalks. We're accelerating the installation of push-button crossings at strategic locations on our major street network, adding new street lighting, and decreasing the cost for residents to install neighborhood traffic calming. **Despite this progress, in 2020, 88 people died while traveling on Tucson streets.**

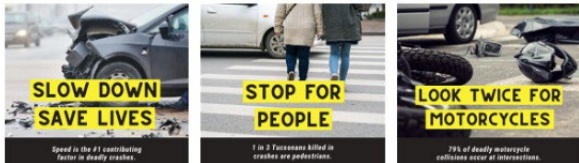
Improving street design will not happen overnight. In the meantime, there are steps we can all take to make getting around our city safer and less stressful for everyone. Together as a city, we all have a role to play in helping prevent crashes and saving lives. *What does this look like?* **Slowing down, turning off distractions, like our phones, making eye contact at crosswalks, and expecting people to cross at every corner.**

How we are making streets safer:

- [Tucson Pedestrian Safety Action Plan](#)
- [Move Tucson: Delivering Mobility Choices](#)
- [Tucson Delivers Strong Connections](#)
- [Complete Streets Tucson](#)
- [Bicycle Boulevard Network](#)
- [Tucson Slow Streets](#)

Traffic safety campaign materials:

Bus Shelter and Bus Ads



Speed is the #1 contributing factor in deadly crashes.
1 in 3 Tucsonans killed in crashes are pedestrians.
79% of deadly motorcycle collisions occur at intersections.

Inicio / Departamentos / Transporte y Movilidad / Proyectos y Programas del DTM / Reduzca la velocidad. Salva vidas.

Disminuya la velocidad. Salve vidas.

Ciudad de Tucson: *Campaña de seguridad vial*



Speed is the #1 contributing factor in deadly crashes.
1 in 3 Tucsonans killed in crashes are pedestrians.
79% of deadly motorcycle collisions occur at intersections.

En el Departamento de Transporte y Movilidad (DTM), hemos implementado, y seguimos implementando, ajustes metódicos y basados en datos en el diseño vial que mejoran la seguridad de todos los que transitan por nuestras calles. Estamos reprogramando los semáforos, agregando ciclovías protegidas y conectando los huecos en las aceras. Estamos acelerando la instalación de cruces peatonales con botón en puntos estratégicos de nuestra red vial principal, instalando nuevo alumbrado público y reduciendo el costo para los residentes de instalar sistemas de calmado de tráfico en sus vecindarios. **A pesar de este progreso, en 2020, 88 personas murieron mientras transitaban por las calles de Tucson.**

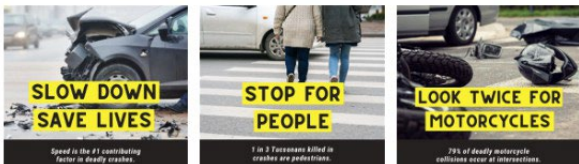
Mejorar el diseño de las calles no se logrará de la noche a la mañana. Mientras tanto, hay medidas que todos podemos tomar para que desplazarnos por nuestra ciudad sea más seguro y menos estresante. Juntos, como ciudad, tenemos un papel que desempeñar para ayudar a prevenir accidentes y salvar vidas. *¿Cómo se traduce esto?* **Disminuir la velocidad, apagar las distracciones, como los teléfonos, hacer contacto visual en los cruces peatonales y esperar que la gente cruce en cada esquina.**

Cómo estamos haciendo las calles más seguras:

- [Plan de Acción de Seguridad Peatonal de Tucson](#)
- [Move Tucson: Ofreciendo opciones de movilidad](#)
- [Tucson ofrece conexiones sólidas](#)
- [Calles completas Tucson](#)
- [Red de bulevares para bicicletas](#)
- [Calles lentas de Tucson](#)

Materiales de la campaña de seguridad vial:

Paradas de autobuses y anuncios de autobuses



Speed is the #1 contributing factor in deadly crashes.
1 in 3 Tucsonans killed in crashes are pedestrians.
79% of deadly motorcycle collisions occur at intersections.

Appendix M - City of Tucson DBE Statement

August 1, 2023

City of Tucson
Policy Statement

U.S. Department of Transportation
DBE Diversity Program for Contracts

The City of Tucson has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. The City of Tucson has received Federal financial assistance from the Department of Transportation, and as a condition of receiving this assistance, the City of Tucson has signed an assurance that it will comply with 49 CFR Part 26.

It is the policy of the City of Tucson to ensure that DBE's, as defined in 49 CFR Part 26, have an equal opportunity to receive and participate in DOT-assisted contracts. It is also our policy:

1. To ensure nondiscrimination in the award and administration of DOT-assisted contracts;
2. To create a level playing field on which DBEs can compete fairly for DOT-assisted contracts;
3. To ensure that the DBE Program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet 49 CFR 26 eligibility standards are permitted to participate as DBEs;
5. To help remove barriers to the participation of DBEs in DOT-assisted contracts;
6. To assist the development of firms that can compete successfully in the market place outside the DBE Program.

Angele Ozoemelum, Director of the Business Services Department has been designated as the DBE Liaison Officer. In that capacity, Ms. Ozoemelum is responsible for implementing all aspects of the DBE Program. Implementation of the DBE program is accorded the same priority as compliance with all other legal obligations incurred by the City of Tucson in its financial assistance agreements with the Department of Transportation. The Procurement Division is also responsible for implementation of the City of Tucson's Small Business Enterprise (SBE) Program and certifies economically disadvantaged business for participation in the City SBE Program.

The City of Tucson has disseminated this policy statement to Mayor & Council, to all City Department Directors and the Department of Transportation & Mobility (DTM) staff. The City subrecipients, Sun Tran, Sun Link and Van Tran, have received a copy with instructions for organizational distribution. This statement has also been distributed to DBE and non-DBE business communities that perform work for the City on DOT-assisted contracts. This policy statement and the DBE Program Plan has been incorporated into the City of Tucson's FTA Procedures Manual. A copy of this policy statement is posted on the Procurement Division website at

<https://www.tucsonaz.gov/Departments/Business-Services-Department/Procurement/Contract-Compliance-DBE-SBE-DBRA/Disadvantaged-Business-Enterprise>. Scroll to Related Information section to view.

The complete DBE Program and the overall annual goal analysis are available for review on the webpage listed above and at:

City of Tucson
Procurement Division
255 W. Alameda, 6th Floor - East
Tucson, Arizona 85701

If you have any question or would like further information regarding this Program, please contact Angele Ozoemelum, Director of Business Services Department at 520-837-4384, by fax at 520-791-4735 or by email at Angele.Ozoemelum@tucsonaz.gov



Michael J. Ortega, P.E.
City Manager

Appendix N - DTM Title VI Agreement Form

This agreement outlines the commitment of its subrecipients or contractors to comply with Title VI of the Civil Rights Act of 1964 and related federal statutes.

[Program/Agency Name and any subcontractors or subrecipients] working with the City of Tucson Department of Transportation and Mobility are committed to ensuring that no individual is discriminated against based on race, color, national origin, sex, age, or disability regardless of the funding source. As the primary, **[Program/Agency Name]** pledges to address any issues within 90 days by sending to the department's Title VI Coordinator, as stated in the City of Tucson Department of Transportation and Mobility's Non-Discrimination Policy Statement. The goal is to prevent discrimination based on race, color, or national origin in all programs and activities, regardless of their funding source.

Scope:

- This agreement applies to all federally assisted programs, including highways, projects, and services, as well as those not receiving federal funds.
- **[Program/Agency Name]** must ensure that their programs provide equal treatment, access, rights, and opportunities to all recipients.

Public Engagement:

- During public outreach meetings, **[Program/Agency Name]** must work with DTM staff to distribute required Title VI documents at events.
- **[Program/Agency Name]** are aware of the responsibility of accommodating requests for accessible materials and language assistance.
- **[Program/Agency Name]** should immediately contact the Title VI Coordinator of the City of Tucson Department of Transportation and Mobility regarding any complaints received.

We understand that, as a contractor or subrecipient, noncompliance with Title VI regulations and statutes may result in:

- Legal and financial repercussions
- Project delays
- Increased oversight and reporting requirements
- Possible withholding, cancellation, or termination of federal funds

By signing below, **[Program/Agency Name]** acknowledges and agrees to adhere to the terms outlined in this Title VI Agreement.

Signature:

[Name]

[Title]

[Date]

Appendix O – Internal Preventing Discrimination Handout



**CITY OF TUCSON
DEPARTMENT OF TRANSPORTATION & MOBILITY
TITLE VI PROGRAM – PREVENTING
DISCRIMINATION**

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in any program receiving federal funding. The Federal Highway Administration (FHWA) extends this to include protections based on sex, age, and disability.

WHAT THIS MEANS FOR DTM:

DTM must ensure equal access to all programs, services, and activities – regardless of funding source – and must not discriminate:

- Directly or indirectly
- Intentionally or unintentionally
- Through unequal treatment or impact
- By limiting or denying access based on protected characteristics





EXAMPLES OF PROHIBITED DISCRIMINATION:

- Denying or limiting service or benefits
- Offering different or unequal services
- Segregating or treating people separately
- Denying participation in planning or advisory bodies

DTM's Commitment:

DTM updates a Non-Discrimination Policy that is signed annually by DTM leadership and submits a compliance report to the Arizona Department of Transportation. View the policy and reports by visiting the [City's Title VI / Civil Rights webpage](#).

Key Areas of Focus:

Contracts and Procurement Title VI assurances are included in all project bids and contracts. Contacts: Dan Longanecker Maritza Felix	Public Information and Basic Rights Civil rights posters and brochures are prominently displayed. Contacts: Rebecca Rucker Kirshana Guy	Data Collection Title VI posters and surveys are available at meetings; demographic data is collected. Contact: Kirshana Guy	Complaint Process Complaint forms and procedures are clear and readily accessible on DTM's webpage. Contacts: Jennifer Bonham Kirshana Guy
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Ongoing Annual Actions:

- Title VI considerations included in the regional Transportation Improvement Program (TIP) via PAG.
- DTM maintains a clear process for language assistance and communication
- Citywide Administrative Directives guide compliance across departments.
- DTM Title VI Plan is updated and published annually.

Updated 2026

Appendix P – Title VI Presentation Provided to DTM Employees

TITLE VI

Of the Civil Rights Act of 1964



**CITY OF
TUCSON**
TRANSPORTATION & MOBILITY

Responsible: Waters, Guy
City of Tucson Department of Transportation and Mobility

TITLE VI

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals and groups from discrimination on the basis of their **race, color, and national origin**, in programs and activities that receive federal financial assistance.

However, the Federal Highway Administration's (FHWA's) citation of Title VI includes additional civil rights provisions from federal statutes, prohibiting discrimination in federally funded programs and activities.



WHAT IS COVERED UNDER TITLE VI?

A program or agency must:

- Provide a service, aid, or benefit;
- May include education or training, work opportunities, health, welfare, rehabilitation, housing or other services



TITLE VI COMPLAINT PROCESS

If someone wants to file a Title VI complaint, promptly explain the process and provide the necessary forms. Complaints must be written and signed. The Title VI Complaint Form can be found on the City of Tucson Title VI / Civil Rights webpage at:

<https://www.tucsonaz.gov/Departments/Rights/Transportation-Mobility/Title-VI-Civil-Rights>

The complaint form must be completed in its entirety. The information requested is necessary to process the complaint. If assistance with completing the form is needed, please contact Kirshana Guy.

EXAMPLES

Example 1:
A resident, who speaks primarily Spanish attends a public meeting about a roadway project. **The City provides interpretation services and translated meeting materials.**

Example 2:
A contractor informs nearby residents of a roadway project using notices **translated into multiple languages.**

Example 3:
A constituent believes they were excluded from participating in a federally funded transportation program because of national origin. **Staff know how to direct them to the Title VI Complaint process and how to contact the Title VI Coordinator.**

EMPLOYEE RESPONSIBILITIES

What should I do if someone says they were treated unfairly?

- Listen respectfully and professionally. Do not argue, dismiss the concern, or determine whether discrimination occurred. Explain DTM's Title VI Complaint Process.

Who do I notify?

- Notify your immediate supervisor and the Title VI Coordinator.

What should I avoid saying?

- X "That is not discrimination." - X "You do not have a case." - X "It is probably just a misunderstanding." - X "There is nothing we can do."	Instead, say: ✓ "Thank you for sharing your concern." ✓ "The City/DTM takes these concerns seriously." ✓ "I can help connect you with our Title VI Coordinator."
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FAILURE TO COMPLY

Failure to comply with Title VI may lead to:

- Federal funds being withheld from the department until compliance is achieved; and / or
- Federal funds being canceled, terminated, or suspended in whole or in part.

Compliance is necessary!

Failure to comply will result in a detrimental impact on services provided to City of Tucson constituents.

MYTH VS. FACT

Myth	Fact
Title VI only applies to race.	Title VI protects against discrimination based on race, color, and national origin.
Only intentional discrimination violates Title VI.	Policies or practices with unjustified discriminatory effects can also violate Title VI concerns.
Only supervisors handle Title VI.	Every employee has responsibilities under Title VI.

OVERVIEW OF FHWA'S CIVIL RIGHTS PROGRAM REQUIREMENTS FOR LOCAL PUBLIC AGENCIES



This video is part of the Federal-aid Essentials for Local Public Agencies video and resource library and was published in August 2016.

PROJECT DATA AND ANALYSIS

Project scope:

- A federally assisted program include any highway, project, program, or activity for the provision of service and for other benefits.

Data Collection:

- The DTM Title VI Coordinator will collect and maintain statistical data on race and sex from public outreach meetings, contract reviews, and beneficiaries of FHWA federal aid projects.

Analyzing Project Data:

- The Title VI Coordinator will conduct program reviews annually based on Title VI activities and complaints to ensure compliance. Special emphasis groups will have quarterly data reviews related to Title VI demographics.

ENSURING COMPLIANCE

DTM staff must ensure that all recipients receive:

1. Equal treatment
2. Equal access
3. Equal rights
4. Equal opportunities



This should be the case regardless of the recipient's race, color, or national origin which includes any applicable language access measures.

ENSURING COMPLIANCE

In public outreach meetings, contract reviews, and to beneficiaries of FHWA federal-aid projects, DTM staff will provide the following:

1. Survey Identification Cards (see next slide)
2. Public Meeting Summary Forms (see next slide)
3. Provide verbiage of accommodation requests!

Para arreglos especiales, materiales en formatos accesibles, intérpretes de idiomas extranjeros, u/o materiales en un idioma que no sea inglés, comuníquese con Kirshana Guy al 520-975-4151, o kirshana.guy@tucsonaz.gov.

For accommodation, materials in accessible format, foreign language interpreters, and/or materials in a language other than English, please contact Kirshana Guy at 520-975-4151 or kirshana.guy@tucsonaz.gov.

Title VI Related

Public Meeting Preparation Checklist: This form is to be filled out prior to a public meeting, contract review or a project, such as an area full service, open house, meeting, or community event. After the meeting, the checklist should be filled out and sent to Kirshana Guy, along with all Title VI survey within 14 days of the event.

Public Meeting Preparation Checklist:

- 1. Develop meeting agenda and other parties include the required documents. If you require a foreign language interpreter.
- 2. Contact the request for accommodation and with Kirshana Guy.
- 3. Review demographic surrounding the project area. Review and through census data, and provide all interested and not interested in language, race and LEP persons to be aware in Kirshana Guy, along with all Title VI survey within 14 days of the event.
- 4. Contact Kirshana Guy and Kirshana Guy to arrange verification with the media and other interested parties.
- 5. Estimate the total number of attendees based on attendance at similar events, and print brochures and other.

During the Meeting:

- 1. Display Title VI Brochure and Project or service on display.
- 2. Develop project survey with all participants to fill out the survey after signing in.
- 3. Contact the total number of attendees.

After the Meeting:

- 1. Submit the form to Kirshana Guy along with all collected Title VI survey.

Self-Identification Survey (Available in English and Spanish)

Self-Identification Survey: This form is to be filled out by the recipient of the service or project, such as an area full service, open house, meeting, or community event. After the meeting, the checklist should be filled out and sent to Kirshana Guy, along with all Title VI survey within 14 days of the event.

Self-Identification Survey:

- 1. Review demographic surrounding the project area. Review and through census data, and provide all interested and not interested in language, race and LEP persons to be aware in Kirshana Guy, along with all Title VI survey within 14 days of the event.
- 2. Contact Kirshana Guy and Kirshana Guy to arrange verification with the media and other interested parties.
- 3. Estimate the total number of attendees based on attendance at similar events, and print brochures and other.

Public Meeting Preparation Checklist Self-Identification Survey (Available in English and Spanish)

Title VI resources, including the Self-Identification Survey, are available on DTM's One Team under "ADA/LEP"

LANGUAGE ASSISTANCE

Recognizing the importance of language access, recipients and subrecipients of Federal and Federally-assisted programs must ensure non-English speakers can access program information. Denying this access could violate Title VI.

In the event of any translation requests, please utilize DTM's Language Line Solutions services, or reach out to the Title VI Coordinator for further assistance:

- Kirshana Guy**
 - Email: Kirshana.Guy@tucsonaz.gov
 - Mobile: (520) 975-4151

WHAT TO DO IF...

Someone requests an interpreter → Provide language assistance using Language Line Solutions on-demand interpreting services or connect them with available resources.

↓

Someone wants to file a complaint → Provide the complaint information and notify the Title VI Coordinator.

↓

You witness possible discrimination → Report it through your department's established process.

STAFF SHOULD REMEMBER:

- ☒ Treat everyone fairly and consistently.
- ☒ Provide meaningful access to City services.
- ☒ Know where to direct Title VI questions or complaints.
- ☒ Ask for assistance if you are unsure.
- ☒ Title VI compliance is everyone's responsibility.

Video presented in slide 9 is part of the Federal-aid Essentials for Local Public Agencies Web site and resource library and was published in August 2016. The video is available at https://youtu.be/mL-R1-WoLAc?si=ao_W9-42Jkd6Sp85.

QUESTIONS?

For additional information, contact:
Kirshana Guy
Title VI Coordinator
Kirshana.Guy@tucsonaz.gov
(520) 975-4151

