

TITLE VI

GOALS AND

ACCOMPLISHMENTS

2025

Title VI Nondiscrimination
Accomplishment report for the Arizona
Department of Transportation (ADOT) to
be included in the Federal Highway
Administration (FHWA) annual report.
Federal Fiscal Year 2025 (October 2024 -
September 2025)

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Introduction

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

The current Title VI plan was updated and submitted along with this report on August 01, 2025. This report summarizes the implementation of DTM's Title VI plan and provides an overview of the goals for the upcoming year. More detailed information and examples can be found in DTM's submitted Title VI plan and on DTM's website. The content has remained contextually like previous versions. The DTM Public Participation plan and Limited English Proficiency (LEP) plan which have been in place for several years are included within the Title VI plan. The public participation plan provides for full and fair participation for all potentially affected communities and includes the City of Tucson LEP Administrative Directive which ensures meaningful access to programs and services. These City Directives include translation of vital documents and free interpretation services when requested. The LEP plan uses a four-factor analysis during the planning phase for each project.

Primarily, DTM uses Census Data and Remix, a data system that shows demographic information like population density and poverty rates of specific populations) to determine the language needs of the community. In addition, DTM uses demographic studies developed by the Pima Association of Governments (PAG). PAG is the Metropolitan Planning Organization (MPO) for the greater Tucson region and coordinates the development of the regional Mobility and Accessibility plan, and the Transportation Improvement Plan (TIP), in coordination with the regional governments and the Regional Mobility and Accessibility Plan (RMAP). As such, all transportation studies and plans are developed by the MPO. PAG's planning studies include Title VI and LEP considerations in all planning efforts.

The DTM website continues to use the Google Translate option for instantaneous translation of our website into nearly 100 languages. The DTM web page was updated to include new Title VI contact information, and all Title VI printed information.

Title VI Public Notices remain posted in public areas and provide the complaint process and include updated contact information. For each public meeting, there is a deliberate process that takes language and other factors into account. Mailings are printed in English and Spanish for project areas/neighborhoods where there is a high concentration of Spanish speakers.

For all other mailings the phrase “For accommodations, materials in accessible formats, foreign language interpreters, and/or materials in a language other than English please contact Kirshana Guy at least 5 business days in advance of this scheduled event.”

There are 9 bilingual employees receiving 2nd language pay, as per the City of Tucson Administrative Directive, as well as 21 Certified Bilingual employees on DTM staff. Project Managers and City of Tucson employees are encouraged to use the “I Speak” Language Identification Flashcards at DTM public meetings and events.

The City of Tucson Department of Transportation & Mobility (DTM) has continued to implement our Title VI plan in all aspects. DTM has been able to effectively sustain or improve all program areas. Each of these topics is elaborated in their respective areas within this report.

- Schedule training once a year in the summer for all internal staff responsible for Title VI compliance, including administrative staff. This training will be the initial training for new staff and refresher training for existing staff. Include a refresher on use of the Language Line System for all front-line personnel.
- Increase staff Title VI Training by attending webinars.
- Increase our outreach efforts to increase participation in public meetings, particularly to minority groups.
- Improve our public outreach efforts to provide information for all members of the community.
- Improve the use of social media in our outreach efforts.
- Increase the number of self-identification survey cards returned at each public meeting via online or in-person.
- Provide translated documents in more instances.
- Monitor the use of the Public Meeting Form which acts as a checklist and data collection mechanism to ensure all Program Managers are consistently following the procedures.
- Document translations and requests for interpretations to improve Limited English Proficiency access.
- Develop a process to regularly collect and analyze FHWA Title VI demographic data from all internal program areas.
- Continue to implement all stated components of existing Title VI plan.

Contract Administration

DTM continued to maintain an open line of communication with Arizona Department of Transportation’s External Civil Rights office and was timely in all requests from ADOT.

DTM continued to participate in the Arizona Certification Agency (CA) Peer group to share ideas and best practices regarding all Certification Acceptance activities.

DTM also adheres to all Certification Acceptance agency procedures which include use of Disadvantaged Business Enterprise (DBE) firms, compliance with Equal Employment Opportunity and all overarching Federal laws. DTM has a satellite Procurement Division that consists of a Procurement Manager and two (2) Senior Contract Officers who are responsible for improving our effectiveness in contractual obligations.

Accomplishments: Program Area Reviews

Since the last report was submitted to ADOT on August 1, 2023, DTM has hosted 42 public meetings including:

1. Drexel Road Modernization Project public meeting.
2. Midtown Bicycle Boulevards public meetings (in-person).
3. El Paso & Southwestern Greenway: Cushing to St. Marys Ice Cream Social at Herrera Quiroz Park (in-person).
4. 1st Avenue Open House (in-person and virtual).
5. Camino-Miramonte- Palo Verde Bicycle Boulevard pop up café at Miramonte Park (in-person).
6. Major Streets and Routes update (in-person and virtual).
7. St. Mary's Pedestrian Safety & Walkability / Congress St and Grande Ave Safety Open House (in-person).
8. Western Hills II and Las Vistas Neighborhood Revitalization project public meetings (in-person).
9. La Cholla Boulevard and San Marcos Boulevard Bikeway Improvements public meeting (in-person).
10. Drexel Road Shared Use Path public meeting (in-person).

The Title VI ***Know Your Rights*** poster and self-identification survey cards in English and Spanish were made available at each meeting. Mailings inviting the public were printed with a statement and phone number for the public to request accommodation, translations, and interpreters as needed. No requests for interpretations services were received. Some announcements were made through social media.

In total there were 1,020 community members in attendance at public meetings as determined by sign-in sheets. All public meetings are held in a publicly accessible location near the project site, or virtually.

Americans with Disabilities Act (ADA) requirements and public transportation routes are taken into consideration when scheduling meetings. Of the participants attending the various events, 27 self-identification survey cards were filled out and returned to staff. Of the 27 cards turned in, zero indicated American Indian, zero African America, 6 Hispanic/Latino, 15 White, and 6 Other. Of the 27 cards, 16 indicated Female, 9 indicated Male, and 2 did not specify gender.

We have updated our website, our posters, and our brochures to be more visually appealing, and to include the updated Title VI Coordinator's contact information. DTM staff are working to identify ways of improving outreach efforts to increase the number of survey cards returned.

All program areas within DTM are reviewed to ensure compliance with Title VI and related regulations, policies, and statutes.

Accomplishments: Sub-Recipient Reviews

DTM processes a relatively large number of contracts per year using multiple funding sources. For contracts using FHWA funding, to ensure compliance with Title VI and other statutes, DTM has incorporated the Title VI Assurances clause of Appendix A and Appendix E into various types of contracts including Request for Qualifications (RFQs) for Engineering Consultant Services, Invitation for Bids (IFBs) for Construction, and Requests for Proposals (RFPs) for Non-Engineering Consultant Services. DTM's Procurement support team staff review the contract and agreements templates on an annual basis to ensure the Title VI language is up to date. For Fiscal Year 2024, five (5) contracts were drafted, solicited and/or awarded using Title VI language.

Goals: Reviews

DTM will continue to thoroughly review every program, and all contracts. Compliance review for programs will be conducted by the Title VI Coordinator with assistance from other division liaisons to ensure all Title VI requirements are met. Procurement support team staff will continue to review the contract agreements templates on an annual basis to ensure Title VI language is up to date.

The Title VI Coordinator will share information learned at Title VI trainings and workshops with the Procurement team to ensure compliance with Title VI and related statutes.

Accomplishments: Title VI Training

DTM staff, including the Title VI Coordinator and CA liaison along with three other DTM staff, attended the virtual Annual FHWA Title VI Training in June 2025, and one staff member attended the in-person training held in Phoenix, Arizona.

On Wednesday, July 23, 2025, the Title VI Coordinator, in coordination with DTM Deputy Director Jennifer Toothaker sent out a virtual Title VI training to all DTM staff to be completed by July 30, 2025. The training consisted of a 23-minute video from the Justice Department, titled *Understanding and Abiding by Title VI of the Civil Rights Act of 1964*. As of July 31, 2025, 250 out of 290 DTM staff members have successfully completed the Title VI virtual training. The Title VI Coordinator will coordinate with HR staff to identify the remaining personnel, ensuring that the training is fully completed and properly recorded for all DTM staff.

To accompany the training video, the Title VI Coordinator created a one-page summary detailing DTM's Title VI Program – Preventing Discrimination. The document details examples of prohibited discrimination, DTM's commitment to compliance with Title VI of the Civil Rights Act of 1964, and lists contacts for key areas of focus within DTM.

To address the Title VI training while onboarding new employees, the Title VI Coordinator worked with HR staff to include Title VI training as a mandatory item on the Supervisor New Employee Check list that is disseminated to supervisors with new employee information. Once completed, the check list will be returned to HR staff.



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 & Procurement: Title VI assurances are included in all project bids and contracts.
Contacts: Dan Longanecker / Maritza Felix.

Public Information & Basic Rights: Civil rights posters and brochures are prominently displayed.
Contacts: Monique Center / Kirshana Guy.

Data Collection: Title VI posters and surveys are available at meetings; demographic data is collected.
Contact: Kirshana Guy.

Complaint Process: Discrimination complaint forms and procedures are clear and readily accessible.
Contacts: Jennifer Bonham / Kirshana Guy.

Ongoing Annual Actions

- Title VI considerations included in the regional Transportation Improvement Program (TIP) via PAG.
- DTM Maintains a Limited English Proficiency (LEP) Plan.
- Citywide Administrative Directives guide compliance across departments.
- DTM Title VI Plan updated and published annually.

Language Line is a company that provides interpretation services over the phone. DTM has an account with Language Line, and a process to train front-line staff in utilizing this resource. If a front-line person receives a call from a constituent speaking an unknown language, the person will place the call on conference hold and place a call to Language Line. If known, the front-line person will tell the Language Line operator what language is needed, or if the language is unknown, the representative at Language Line will help determine the language before the limited-English speaker is added to the line.

Goals: Training

The Title VI Coordinator will work to identify new ways to disseminate Title VI trainings to all DTM staff, including the use of the new one-page summary disseminated to staff during the July 2025 training. The Title VI Coordinator will review all training materials to ensure compliance with the changes in policies outlined during the Annual FHWA Title VI training held in June 2025. The Title VI Coordinator or a designee will attend at least one Title VI training during FY 2025 and share training materials with DTM liaisons and provide training to DTM staff during FY 2025.

Accomplishments: Complaint Procedures

DTM maintains a written procedure for the public to file Title VI 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, national origin (including Limited English Proficiency), they may exercise their right to file a complaint with the City. Complaints may be filed with the Title VI Coordinator. The DTM coordinator will forward all discrimination complaints to ADOT External Civil Rights for investigation and forward all other complaints to the appropriate division for investigation. No complaints were received in FY 2024 and the Title VI Coordinator information was updated on the City of Tucson's [Title VI / Civil Rights](#) webpage.

Goals: Any other Title VI Related Goals

To enhance the accessibility of our digital resources and materials, The Title VI Coordinator will work with the Planning Division and the Transportation Program Coordinator / CA Liaison to ensure all Title VI materials are presented in virtual meetings.

DTM is committed to continuously updating our training modules and resources to reflect the latest regulatory requirements and best practices, ensuring our staff are well-equipped to uphold the principles of Title VI in all their work and will continue to do so in FY 2025.