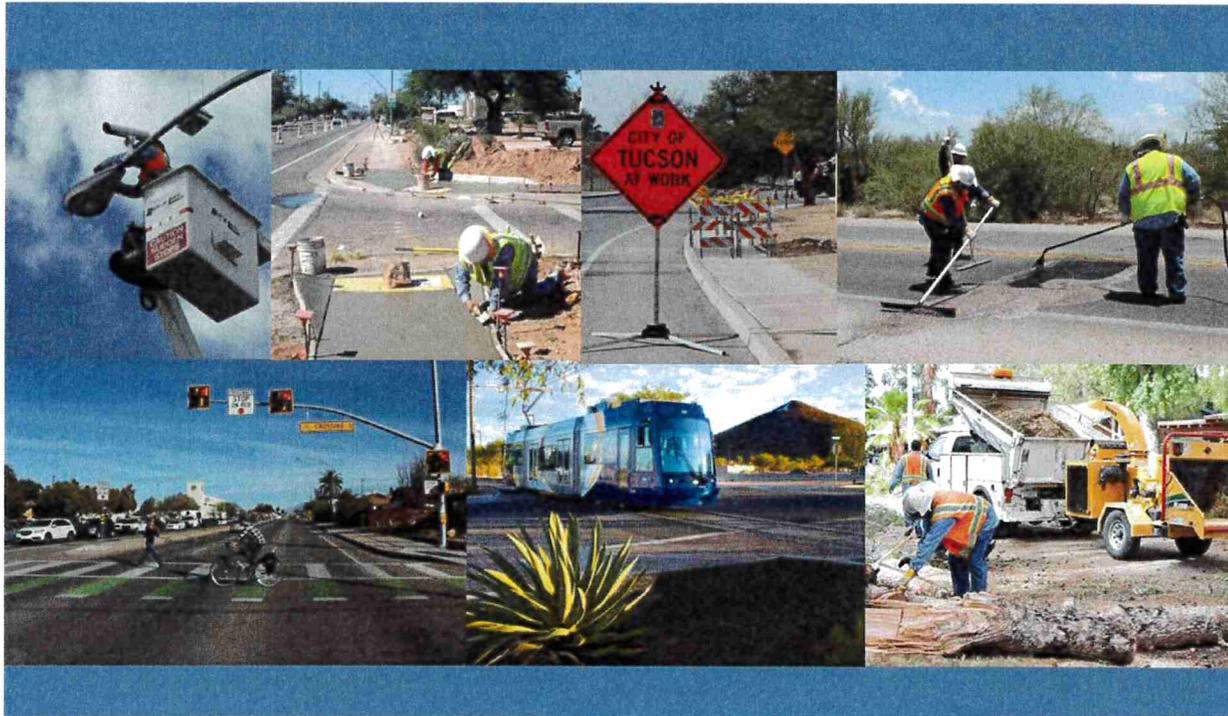


City of Tucson

DEPARTMENT OF TRANSPORTATION



Title VI Non-Discrimination Plan

Annual Update

August 1, 2019

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Tucson, AZ 85701

Phone: (520) 791-4371

www.tucsonaz.gov/transportation

www.tucsonaz.gov/tdot/title-vi

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I. NON-DISCRIMINATION POLICY STATEMENT

REVISED

DEPARTMENT OF TRANSPORTATION

POLICY BULLETIN



SUBJECT: Title VI Non Discrimination Policy Statement		NUMBER	PAGE	
		1.50	1 of 1	
		EFFECTIVE DATE: 08/01/2019		
<input checked="" type="checkbox"/>	All Divisions	Streets & Traffic Maint.	Transportation Director Approval: 	Approval Date: 
<input type="checkbox"/>	Director's Office	Transit Services		
<input type="checkbox"/>	Administrative Services	Park Tucson Planning & Programming		
<input type="checkbox"/>	Engineering			
<input type="checkbox"/>	Traffic Engineering			

NON-DISCRIMINATION POLICY STATEMENT

The City of Tucson, Department of Transportation assures that no person shall on the grounds of race, color, national origin, 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 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 meaningful access to services for persons with limited English proficiency.

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

II. 2019 TITLE VI STANDARD ASSURANCES

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 assurances that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its *Federal Aid Highway Program*.

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all *Federal Aid Highway Program* and, in adapted form, in all proposals for negotiated agreements regardless of finding 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-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 a 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.

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits;
- or
- b. the period during which the Recipient retains ownership or possession of the property.

9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

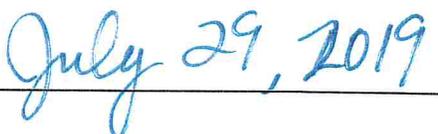
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, 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 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)

DATED 

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 performance by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for 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 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. canceling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with request to any subcontract or procurement as the Recipient, the *Federal Highway Administration, or Arizona Department of Transportation* may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

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

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that *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 and* the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252;42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the *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 *City of Tucson* 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 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 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

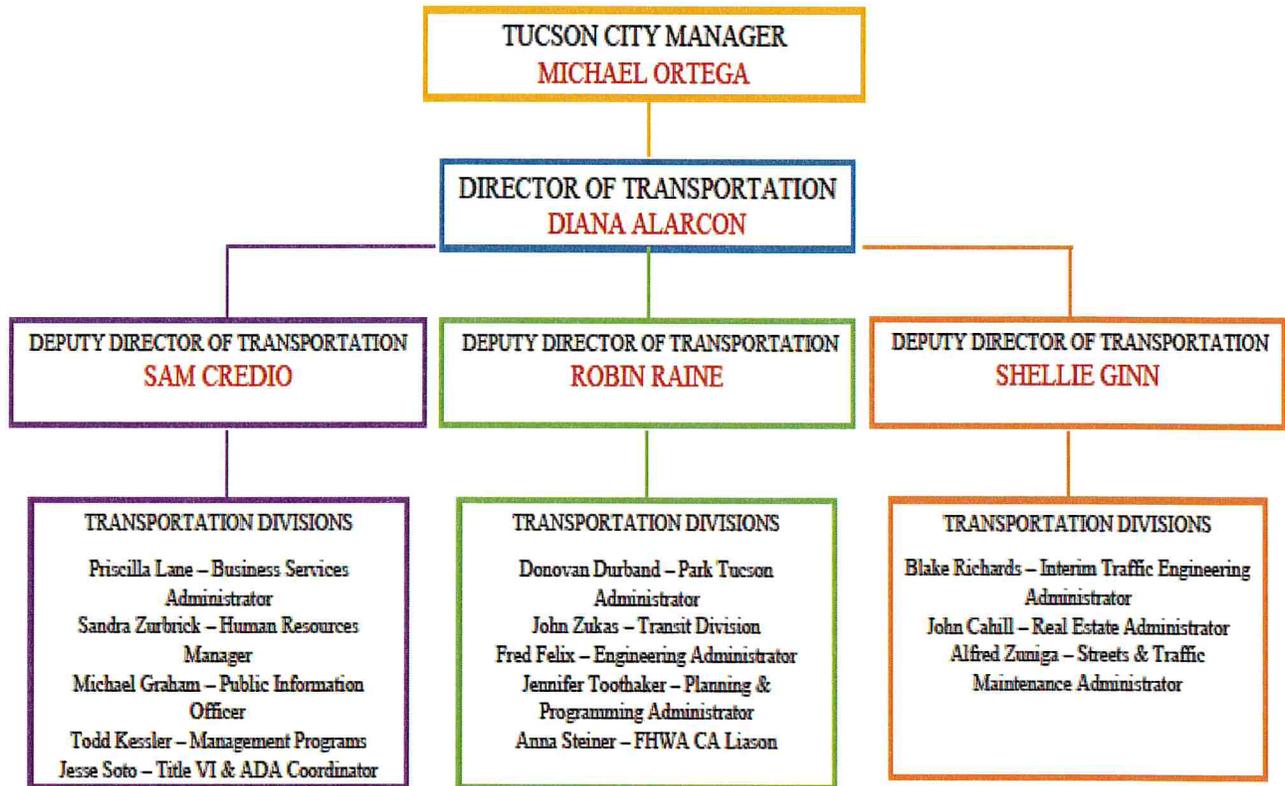
During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

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. 1687 *et seq.*).

III. TDOT ORGANIZATION CHART

Title VI Coordinator (Jesse Soto reports Tucson Department of Transportation (TDOT) Deputy Director Sam Credio. The Deputy Director reports to the Director of Transportation Diana Alarcon. The Title VI Coordinator oversees the Title VI training for all department personnel as well investigations of discrimination. The Title VI Coordinator also works closely with the Office of Equal Opportunity Programs (OEOP) of the City of Tucson and the City Attorney’s office, Civil Division to ensure equity and compliance. Additionally, constituent services and all complaints including Title VI complaints are recorded through the TDOT Title VI Coordinator.



IV. 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 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) 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 TDOT or indirectly through contracts or other arrangements with other agents.

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

Discrimination under our 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 TDOT program or activity. Discrimination based on the grounds referenced above limit the opportunity for individuals and groups to gain equal access to services and programs. In administering federally assisted programs and activities, TDOT 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 persons the opportunity to participate as a member of a planning, advisory or similar body;
- Denying persons 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. To assign roles, responsibilities, and procedures for ensuring compliance with Title VI of the Civil Rights Act of 1964, and related regulations and directives;
2. To 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. To prevent discrimination in the City of Tucson's programs and activities, whether those programs and activities are federally funded or not;
4. To 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 persons and affected Title VI populations;
5. To establish procedures to annually review Title VI compliance within specific program areas within the City;
6. To set forth procedures for filing and processing complaints by persons who believe they have been subjected to illegal discrimination under Title VI in the City's services, programs or activities.

V. ADMINISTRATION OF TITLE VI PROGRAM

The City of Tucson, Department of Transportation (TDOT) assures that no person 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 sponsored program or activity. TDOT 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. TDOT will take reasonable steps to provide meaningful access to services for persons with limited English proficiency. In order to accomplish the goals stated in Section IV, TDOT has instituted proactive measures as described in this document. The complaint procedures are described in detail in section IX and provided online and in the appendix.

TDOT staff work in cooperation with the City of Tucson Office of Equal Opportunity Program (OEOP) which implements and enforces equity policy for the City of Tucson including overseeing the Administrative Directives for LEP, ADA, and Title VI of the Civil Rights Act as well as the City Code (Chapter 17). More specifics can be found at <https://www.tucsonaz.gov/oeop>
See Appendix for sample webpages and documents through OEOP.

Staffing Roles:

OEOP Director – Rebecca Hill

The Office of Equal Opportunity Programs (OEOP) implements and enforces equity policy for the City of Tucson. OEOP ensures the implementation and enforcement of non-discrimination policies in City employment. OEOP 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 TDOT staff and all City of Tucson Department to ensure equity and non-discrimination.

TDOT Director – Diana W. Alarcon

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 nondiscrimination assurances to aid in ensuring all civil rights requirements are met. The Director sets TDOT policy and establishes procedures to ensure Department-wide implementation of the nondiscrimination plan. The Director provides opportunities for the Management Team to discuss and problem solve any issues and to provide leadership through

TITLE VI NON-DISCRIMINATION PLAN

our monthly Leadership Education and Development (LEAD) sessions. The Director provides guidance and strategic planning for all TDOT initiatives and ensures our nondiscrimination policies are implemented throughout the organization.

Title VI Coordinator – Jesse Soto

The Title VI Coordinator reviews the implementation annually including all TDOT directives for any Title VI implications. Additionally, the Title VI Nondiscrimination Program Coordinator's oversight includes ongoing program review and training not limited to:

1. Attend ADOT trainings, meetings and onsite review visits in order to implement of TDOT's Title VI program.
2. Work with the FHWA Certification Acceptance Liaison to submit all Title VI agency documents to the ADOT LPA section as requested through the Certification Acceptance process (see sample CA Assessment Status Report in Appendix).
3. Complete the onsite compliance review document as requested by ADOT's Office of Civil Rights; attend onsite compliance review as requested by ADOT.
4. Respond to request for information from ADOT's Office of Civil Rights.
5. Annually ensure the Title VI Assurances are signed by TDOT Director.
6. Annually coordinate Title VI training for TDOT.
7. Preparing and disseminating an annual report of accomplishments for the past year and goals for next year for ADOT by August 1st.
8. Updating the Title VI program plans annually and submitting to ADOT by August 1st.
9. Developing Title VI information for distribution to the general public as needed.
10. Monitoring public participation and awareness of Title VI policies and procedures for their effectiveness in reaching the public.
11. Providing guidance and technical assistance on Title VI matters with overall program responsibility for preparing required annual reports regarding Title VI compliance and initiating monitoring activities including developing and reviewing directives, procedures, monitoring and resolution of deficiencies through process improvement and training.

Special Emphasis Program Reviews: Special emphasis program reviews will be conducted throughout the year and be used to determine the accomplishments and goals section of the annual report as well as the annual updated Title VI plan both due to ADOT August 1st. 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 Coordinator to ensure compliance of Title VI provisions. The special emphasis groups will have quarterly reviews of their data collected as it relates 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.

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Sub Recipient Review Procedures: Title VI Program information will be dispersed to contractors and beneficiaries through inclusion of the Title VI language in contracts. TDOT 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 statues and regulations. Each subcontractor's contract must be approved by TDOT to ensure all proper documentation related to the mandatory non-discrimination language is included. The subcontractor must be approved prior to any initiation of work on the federal project. During the approval process, TDOT staff or a party acting on behalf of TDOT (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.

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

Annual Report & Annual Training Dates: The Title VI Coordinator will be responsible for coordination of the annual training to the Tucson Department of Transportation, and will submit the training records to ADOT.

Annual Title VI Plan Updates: A copy of Title VI Implementation Plan will be submitted to the ADOT Civil Rights Unit annually due August 1st which includes the annually signed policy statement, annually signed standard DOT assurances, annually updated organization chart, annually updated staffing overview and annually updated program review procedures.

Title VI Public Information/Constituent Services Program Coordinator – Jesse Soto

The Title VI Public Information Program Coordinator/Constituent Services works in all aspects of the Title VI program, particularly with outside agencies, Public Involvement firms and constituents.

1. Document Title VI complaints; forward all discrimination complaints to City of Tucson Office of Equal Opportunity Programs (OEOP). Forward all FHWA complaints and Title VI complaints to ADOT for investigation. Forward all other complaints to the appropriate division for investigation. See section IX for procedures.
2. Coordinate, update and oversee implementation of the Limited English Proficiency (LEP) plan and work in partnership with the OEOP Director to train Customer Service Representatives in the use of the "Language Line System."
3. Provide technical assistance, tools, and resources for implementing the Public Involvement plan in conjunction with the Public Relations Firm.
4. Coordinate with the Public Information Officer to ensure implementation of the Title VI, LEP, Public Involvement Plans in outreach, newsletters, press releases, printed posters, brochures, and updating website, using Social Media and ensuring there is a process to communicate road impacts in alternate languages.

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5. Collection of Public Meeting Checklists & data compilation from returned Title VI Survey Forms (see Appendix for samples).

Complaints: If any individual believes that he/she 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), he/she may exercise his/her right to file a complaint with the City. Complaints may be filed with the Constituent Services Program Coordinator.

Remedial Action: The City, through the Title VI Coordinator, will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When deficiencies are found, procedures will be promptly implemented to correct the deficiencies and to put in writing the corrective action(s). The period to determine corrective action(s) and put it/them in writing to effect compliance may not exceed 90 days from the date the deficiencies are found.

Program Area: South Tucson Outreach, Boundary area includes South 22nd St. to the north, Los Reales Rd to the south, 6th Ave to the east and Mission Rd to the west. Information will be reviewed to ensure Title VI Compliance.

Data Collection: Statistical data on race and sex will be gathered and maintained by the TDOT Title VI Coordinator, from the public outreach meetings and contract reviews and beneficiaries of FHWA federal aid projects. At public meetings, staff request participants to voluntarily complete survey forms (Survey Identification Cards can be found in Appendix E). 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 LEP program areas utilized when reporting annually to the ADOT Civil Rights Office. The gathering procedures will be reviewed annually to ensure sufficiency of the data in meeting the requirements of the Title VI program and to help determine who attends public meetings and if any disparities are identified. If a deficiency is found, staff will review and observe data and compare the demographics found on American Fact Finder (factfinder.census.gov), for the target area, to determine if TDOT needs to make any additional efforts to reach the appropriate individuals to participate in our projects. TDOT will work with staff to provide resources and further training to achieve full compliance.

An FHWA funded data collection program example is our Liberty Bike Boulevard. It will take place in the South area of Tucson, on Liberty St. between Ajo Way Rd. and Los Reales Rd. This project will include a new ADA compliant sidewalk, new bike accommodations, traffic calming, and HAWK Crossing Lights. It is a Community Focused Project, in partnership with the City of Tucson, LSA, Families United Gaining Accessibility (FUGA) and other community partners to coordinate and administer a traffic calming project that will provide safety to pedestrians, bicyclists and motorist alike. The City of Tucson, TDOT, has engaged in a new outreach component to this project. It included the hiring of a Community Ambassador (CA), this person is from the local area and is embedded within the community. This CA provides an advantage to our outreach efforts by having extensive knowledge of the area, understanding the community and its people, having organizational background, and being bilingual. Surveys of student travel tallies,

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assist schools in gathering information on current student travel and parent attitudes and concerns regarding walking or bicycling to school. Survey summary reports will inform what kinds of SRTS activities and interventions are implemented, while establishing baseline data by which to monitor impacts of future SRTS activities. Title VI Data collection will employ the following tactics: 1) Do a formative assessment at the onset of the school year. 2) Do an extensive process evaluation throughout the course of the program. 3) Do an outcome evaluation to understand the program impact/effectiveness. Outreach efforts for Title VI data will be collected in a variety of ways, Neighborhood Association Meetings, Open House Meetings, Ice Cream Socials, Bike Rodeos, Media Websites, etc. Title VI surveys will allow us to evaluate language issues, age abilities, ADA requirements, and gender issues.

Public Dissemination: TDOT will disseminate Title VI Program information to City employees and to the general public. 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 TDOT'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, 5th and 6th floors of the Public Works building at 201 N. Stone where TDOT is headquartered.

PAG/RTA Partnership - TDOT 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. TDOT's and PAG's public involvement efforts have generated large databases of stakeholders and members of the general public identified through a variety of public involvement efforts over the years. Those 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 web links for detailed data analysis and long-range strategic transportation planning for the region.

RTA Title VI

[http://www.rtamobility.com/AboutRTA/TitleVI\(Non-Discrimination\)/tabid/191/Default.aspx](http://www.rtamobility.com/AboutRTA/TitleVI(Non-Discrimination)/tabid/191/Default.aspx)

PAG Title VI

<https://www.pagregion.com/AboutPAG/TitleVINonDiscrimination/tabid/1076/Default.aspx>

FHWA Certification Acceptance Liaison –Anna Steiner

Liaison will coordinate, compile and submit to ADOT Local Public Agency (LPA) Section all FHWA/ ADOT recertification documentation requested in order to ensure that the Arizona Certification Acceptance (CA) Program is renewed in a timely manner. This includes Civil Rights (Title VI, ADA, DBE) procedures as well as Procurement, Materials, Right-of-Way,

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Project Delivery, Internal Operations, Bid Analysis, Award, Subcontractor Approval, Performance Measures.

Liaison will work with TDOT 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.

VI. PUBLIC PARTICIPATION PLAN

Tucson Department of Transportation's (TDOT) 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 and Environmental Justice provisions.

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 to the various populations that will need to be integrated into those public involvement efforts seeking input on alternative development, alternative preferences, and/or mitigation. TDOT addresses Title VI requirements both quantitatively and qualitatively with thorough public involvement and data analysis techniques.

To foster public participation, staff in each project ensures that information is readily accessible and ensures 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 TDOT Information

TDOT'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 TDOT document is responded to in a timely manner. At a minimum, a written response is provided within one week of the receipt of a public information request.

Stakeholder Analysis

TDOT 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 TDOT staff involved in related activities and other governmental agencies with jurisdiction or interest in the activity. External stakeholders typically

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include those non-governmental parties who may be affected by the activities and/or have an interest in them. This includes Title VI and Environmental Justice populations.

Many of TDOT'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 reflect the broadest range of stakeholders reasonably possible. One common method for identifying additional stakeholders is to interview existing stakeholders to determine who else needs to be involved.

TDOT's staff and project teams maintain large databases of stakeholders and members of the general public identified through a variety of public involvement initiatives over the years. These databases include civic and community organizations serving Title VI and Environmental Justice populations, neighborhood and homeowner associations, environmental and business groups, elected officials, and other public groups.

Public Notification of TDOT Activities and Services

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

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

For reaching the general public, the City of Tucson website and media outreach (e.g., news releases) are encouraged. For reaching stakeholder groups, distribution of public information documents such as reports and newsletters via direct mail also may be an effective communication method. The use of other methods is considered to promote equal access to information for targeted audiences. In particular, efforts to overcome barriers to accessing information among underserved populations, youth, and other individuals who may not have Internet access or read newspapers are undertaken.

Public service radio announcements on Latino radio outlets are one method for reaching Hispanic populations, particularly non-English speaking residents. Additionally, underserved populations are no different than other populations in that they are more likely to read information distributed through trusted and familiar communications channels. Email is used to distribute notices to school and community-based newsletters for publication. Placement of English/Spanish information in libraries, community centers, or other public places is also used.

Spanish & Asian Translations

As indicated in TDOT's Limited English Proficiency (LEP) Plan, Spanish is the predominant primary language followed by Asian being spoken by those in the TDOT Service area who speak English "less than very well."

Public information documents written in English, including meeting notices, include a tagline

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affirming that TDOT 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. As the need for Asian translation rises, TDOT will have on hand a Language Identification Flashcard available at all public meetings and will make reasonable accommodations to translate any material in Asian.

Spanish translations are used for activities targeted to the general 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 TDOT'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 TDOT 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 performs a basic assessment to identify the location of protected Title VI and Environmental Justice populations in relationship to the provision of information and planning products and services. Pima Association of Governments' online regional data provide project staff with maps showing the location of protected Title VI and Environmental Justice 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 Environmental Justice provisions.

Meeting Scheduling, Location and Access

Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general 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 TDOT region, the meeting or hearing is held within that geographic area. Appropriate 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.

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Title VI information on the TDOT Website

TDOT maintains a Title VI section on the TDOT website where the public can learn about TDOT's Title VI commitments, Non-Discrimination Policy and Limited English Proficiency Plan, 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 in the Title VI webpage to allow users to translate the entire TDOT website into over 50 languages. The public can access the English and Spanish versions of the Title VI web pages from TDOT's homepage.

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LIMITED ENGLISH PROFICIENCY PLAN

Purpose/Legal Authority

The City of Tucson Department of Transportation (TDOT) is committed to providing meaningful access to consumers of TDOT program, services and/or activities. Individuals who do not speak English as their primary language and have a limited ability to read, write, speak or understand English are considered Limited English Proficient (LEP). This language issue may prevent individuals from accessing services and benefits. It may also be a barrier that prevents meaningful access to public participation and input on public projects. It is important that TDOT be innovative and proactive in engaging individuals including oral and written language services to LEP individuals as detailed under “Language Assistance Measures” of this document.

This plan is consistent with Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency which is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. In some circumstances, failure to ensure that LEP persons can effectively participate in federally assisted programs may constitute discrimination based on national origin under Title VI. In order to comply with Title VI, agencies are required to take reasonable actions for competent language assistance. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English. Executive Order 13166 clarifies requirements for LEP persons under Title VI. This Executive Order requires the agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.

Four Factor Analysis

There are four factors TDOT considered when assessing language needs and determining what steps they should take to ensure access for LEP persons: 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of TDOT; 2) The frequency with which LEP individuals come in contact with the program; 3) The nature and importance of the program, activity or service provided by the TDOT to people’s lives; and 4) The resources available to the recipient and costs. A brief description of the self-assessment undertaken in each of these areas follows.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.

Spanish speakers are the primary LEP persons likely to be encountered by the Tucson Department of Transportation (TDOT). For Pima County, the American Community Survey 2011 - 2015 information shows that the total population is 938,413. Spanish is spoken by 221,947 people, or 23.6% of the population. Of those who speak Spanish, 63,489 people (28.6%) reported speaking English less than “very well.” These Spanish-speaking LEP persons comprise 6.7% of the total population of Pima County. In Pima County, other languages spoken were a much smaller proportion with the exception of the Asian Language. Asian is spoken by 13,981 or 1.9% people. Of those who speak Asian, 6,881 people (49%) reported speaking English less than “very well.” Those who

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identified themselves as LEP persons in these other languages comprise only 0.2% of the total population of Pima County. The 2015 American Community Survey (ACS) for Tucson (conducted by the US Census Bureau) also indicates that Spanish speaking LEP persons are most likely to be encountered, comprising 86% of LEP persons in the City of Tucson, and 20% of the total population.

2. The frequency with which LEP individuals come in contact with the program.

TDOT assesses the frequency at which staff has or could possibly have contact with LEP persons. 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 (20%) of the general population of Tucson who are Spanish speaking LEP persons. As a transportation agency, it is necessary for TDOT to recognize this segment of the general population. Phone inquiries and staff feedback also indicate that Spanish-speaking LEP persons have regular contact with the TDOT services.

3. The nature and importance of the program, activity or service provided by the recipient to people's lives.

TDOT keeps Tucson moving smoothly and safely. TDOT's nearly 300 employees oversee the maintenance, new construction, and reconstruction of nearly 4,400 lane miles of streets, and are responsible for stormwater and flood control services as well as, public art pieces, street lights and signs, and traffic signs and signals in Tucson. TDOT also operates the city's transit services, Sun Tran, Sun Link, and Van Tran.

4. The resources available to the recipient and costs.

TDOT 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 a Language communication skill compensation for employees and Administrative Directive 2.01-1D establishes language services for LEP customers. See appendix.

Resources include identifying bilingual staff, training front-line personnel in the use of the Language Line resource, reviewing the existing City contracts for professional translation-services providers, determining which documents should be translated, and deciding on the level of staff training needed.

Components of the TDOT LEP Plan

In accordance with the four factors above, TDOT developed the following Plan for providing language assistance to LEP persons.

There are five areas that comprise the TDOT LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures, including Language Line for front-line staff
3. Training staff

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4. Providing notice to LEP persons
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

Primarily, TDOT has used Census 2000 and American Community Survey data to determine the language needs of the community. This data indicate that Spanish-speaking LEP persons are the primary group requiring language assistance. This information can also be used to identify concentrations of LEP persons within the service area. There are nine zip code areas with a higher percentage of LEP persons than average for the overall Tucson population. They are as follows: 85701, 85705, 85706, 85711, 85713, 85714, 85736, 85745 and 85746.

In general, there are higher populations of LEP persons on the south and west sides of the City of Tucson and specifically in the area located between I-10 and I-19. Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures. In addition to using Census data, and input from customer service representatives, TDOT also uses these tools to measure and identify individual persons who may need language assistance:

- At open houses, public meetings, and other events, TDOT staff will collect data from received Language Identification Flashcards (see appendix for sample flashcards).
- TDOT will post notice of available language assistance in all customer service areas to encourage LEP persons to self-identify.
- TDOT will use the Self-Identification Survey cards at public meetings and encourage LEP persons to self-identify.
- Ongoing strategies as needed to ensure meaningful access to all public events.

2. Language assistance measures

In order to provide meaningful access and exemplary customer service, there are several language assistance measures available at TDOT. Whether in person, by telephone, or in writing, TDOT includes both oral and written language services. There are also various ways in which TDOT staff responds to LEP persons. See LEP Flowchart and Administrative Directive 2.05-9 “Services for Language Access Policy for Limited English Proficiency” in the Appendix.

Some of the measures used by TDOT to provide Language Assistance:

- Use of the Language Line System implemented in 2018 (see item 6)
- Use of Language Identification Flashcards to determine needs and arrange for interpreter and/or translator (see appendix)
- Spanish-speaking personnel are on hand at public meetings or open houses intended for providing information and gathering public input.
- Automated phone system that transfers Spanish-speaking callers to a bilingual Customer Service Representative.

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- Bilingual Customer Service Representatives are also available to respond to any email/written correspondence in Spanish.
- TDOT provides Second Language Pay/Stipend for employees whose classification has been determined to have a significant interaction with the public. See appendix for Administrative Directive 2.05-9. See appendix for a list of TDOT employees receiving stipend.
- TDOT website allows for user to select a language and automatically translates the website and online forms. See appendix for example of Street Maintenance Request form in Spanish.
- Written language services are available. Documents that are determined to be vital - documents without which a person would be unable to access services - are translated into Spanish. Some examples may include, but are not limited to: Open House Invitations, Meeting Announcements, Prevent Stormwater Pollution, Right of Way Permits, ADA Paratransit Eligibility Application, and Reduced Fare Programs for Sun Tran.
- City of Tucson contracts with translation and interpretation services 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 (see appendix for procurement memo).

To ensure that bilingual staff service providers are competent, they must demonstrate proficiency and the ability to communicate information accurately in both English and Spanish. Proficiency is determined by the City of Tucson Human Resources Department. Contracted professional services are used to translate more complex and lengthy information, and for immediate LEP customer interactions, including sign-language interpretation with falls under both LEP and ADA.

All Customer Service Representatives are also responsible for recording general service complaints and forwarding them to the appropriate divisions as necessary. TDOT oral language services include bilingual staff in customer service centers, field services, and public information functionality – a bilingual staff member is available most of the time.

3. Training Staff

The TDOT Title VI Coordinator will be responsible for the overall Title VI related training. The Title VI Coordinator will organize and or conduct at a minimum of one training session for TDOT staff annually focused on Title VI and the LEP Line. In addition, any trainings regarding Title VI and the requirements for all subcontractors will be included at every project Pre-Construction meetings. The TDOT Title VI Coordinator and any additional TDOT staff will attend all trainings offered by Arizona Department of Transportation, Civil Rights Office.

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. All front-line personnel in Transportation, Park Tucson and Streets and Traffic were trained in the Language Line system. This system enables front-line staff to call

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Language Line by phone for translation services in more than 240 languages from any phone 24/7. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP Plan. Training staff is a key element in the effective plan implementation.

The primary TDOT staff groups critical to the LEP Plan are front-line staff whom have a reasonable opportunity to come in contact with an LEP individual. These positions include but are not limited to: Customer Service Representatives (CSRs), Secretaries, Public Info Specialists & Supervisors. These staff positions typically have the most frequent contact with LEP persons through daily interaction with TDOT customers, either in-person or by telephone. These groups are most likely to encounter LEP persons and thus to provide language assistance. LEP training (including training in the Language Line System) for these groups occurs during their initial departmental training.

TDOT Administrators and Supervisors of areas that have public contact are crucial in implementing LEP policy. Copies of the LEP Plan are distributed to all Department Administrators/Division Heads, and it is their responsibility to disseminate LEP Plan information and Language Line Access Guides to appropriate staff. A summary of the LEP Plan should be addressed during TDOT new employee orientation program. Topics to be addressed during training for new employees and revisited for continuing TDOT employees include, but are not limited to:

- Understanding the Title VI LEP responsibilities
- Overview of language assistance services offered by TDOT
- Specific procedures to be followed when encountering an LEP person
- How to use the “I Speak” multi-language identification flashcards
- How to contact Language Line translation services if needed

Public Information staff members are also a key element in the implementation of the LEP Plan. They produce nearly all written forms of communication to the customer base and community, and are diligent in ensuring that the LEP Plan is followed in serving LEP customers. The TDOT Public Information Officer works closely with the Title VI Coordinator to ensure compliance in all public matters.

4. Providing notice to LEP persons

There are several ways that TDOT provides notice to LEP persons that language assistance measures are available, through both oral and written communications. This includes but is not limited to:

- Posters in English and Spanish in public waiting areas and meetings
- Brochures in English and Spanish in public waiting areas and meetings
- “I Speak” multi-language identification cards
- Multi-lingual phone lines
- Multi-lingual website using “Google Translate”

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5. Language Line System

June 16-20, 2019, the Title VI Coordinator (Jesse Soto) attended an ADA Symposium in Dallas, Texas and was provided training on the Language Line system. Language Line is a company that provides interpretation services over the phone. The City of Tucson Transportation Department applied for an account with Language Line and front-line personnel were subsequently trained in this valuable resource. If a front-line person receives a call from a constituent speaking an unknown language, the person places the call on conference hold and places a call to Language Line. The front-line person tells the operator what language is needed, or if it is unknown what language the person is speaking, the representative at Language Line will help determine the language. The limited-English speaker is then added to the line.

6. Monitoring and updating the LEP Plan

The LEP Plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services, and to update the LEP Plan when appropriate.

National Origin Discrimination Complaints

National origin discrimination complaints from LEP persons should be forwarded to the City of Tucson's Equal Opportunity Program Division (OEOP) according to City policy. TDOT follows the City's OEOP process for filing a complaint. Complaint forms for both external and internal complaints can be found online at:

<http://www.ci.tucson.az.us/eoo/Complaints/complaints.html>

The City of Tucson's Administrative Directive #2.05-9 "Services for Language Access Policy for Limited English Proficiency (LEP) can be found on the City's website.

<http://www.tucsonaz.gov/hr/administrative-directives>

Dissemination of the LEP Plan

Along with all City of Tucson Departments, the TDOT LEP Plan is posted on the OEOP's Intranet website. Copies of the LEP Plan are provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the LEP Plan upon request.

<http://www.tucsonaz.gov/oeop/limited-english-proficiency-lep>

VII. ENVIRONMENTAL JUSTICE (EJ)

Compliance with Title VI includes ensuring that no minority or low income population suffers "disproportionately high and adverse human health or environmental effect" due to any "programs, policies and activities" undertaken by any agency receiving federal highway funds. This obligation will be met by the City in the following ways:

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- When planning specific programs or projects, identifying those populations that will be affected by a given program or project.
- If a disproportionate effect is anticipated, following mitigation procedures.
- If mitigation options do not sufficiently eliminate the disproportionate effect, discussing and, if necessary, implementing reasonable alternatives.

Disproportionate effects are those effects which are appreciably more severe for one group or predominantly borne by a single group. The City will use U.S. Census data to identify low income and minority populations.

Where a project impacts a small number or area of low income or minority populations, the City will document that:

- Other reasonable alternatives were evaluated and were eliminated for reasons such as the alternatives impacted a far greater number of people or did greater harm to the environment; etc.
- The project's impact is unavoidable;
- The benefits of the project far out-weigh the overall impacts; and
- Mitigation measures are being taken to reduce the harm to low income or minority populations.

If it is concluded that no minority and/or low income population groups are present in the project area, the City will document how the conclusion was reached. If it is determined that one or more of these population groups are present in the area, the City will administer potential disproportionate effects test.

The following steps will be taken to assess the impact of projects on minority and/or low income population groups:

STEP ONE: Determine if a minority or low income population is present within the project area. If the conclusion is that no minority and/or low income population is present within the project area, document how the conclusion was reached. If the conclusion is that there are minority population groups and/or low income population groups present, proceed to Step Two.

STEP TWO: Determine whether project impacts associated with the identified low income and minority populations are disproportionately high and adverse. If it is determined that there are disproportionately high and adverse impacts to minority and low income populations, proceed to Step Three.

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STEP THREE: Propose measures that will avoid, minimize and/or mitigate disproportionately high and disproportionate adverse impacts and provide offsetting benefits and opportunities to enhance communities, neighborhoods and individuals affected by proposed project.

STEP FOUR: If after mitigation, enhancements and offsetting benefits to the affected populations, there remains a high and disproportionate adverse impact to minority or low income populations, then the following questions must be considered:

Question 1: Are there further mitigation measures that could be employed to avoid or reduce the adverse effect to the minority or low income population?

Question 2: Are there other additional alternatives to the proposed action that would avoid or reduce the impacts to the low income or minority populations?

Question 3: Considering the overall public interest, is there a substantial need for the project?

Question 4: Will the alternatives that would satisfy the need for the project and have less impact on protected populations (a) have other social economic or environmental impacts that are more severe than those of the proposed action (b) have increased costs of extraordinary magnitude?

STEP FIVE: Include all findings, determinations or demonstrations in the environmental document prepared for the project.

VIII. FILING A TITLE VI COMPLAINT

FHWA Title VI Complaint Process

These Procedures apply to all complaints filed under the Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 as they relate to any Federal Highway Administration program or activity administered by the Tucson Department of Transportation, its sub-recipients, consultants and contractors. In addition to these procedures, complainants reserve the right to file formal complaints with other state or federal agencies or take legal action for complaints alleging discrimination.

Required procedures for FHWA Title VI Complaints filed against the Tucson Department of Transportation, TDOT's sub-recipients, contractors or consultants:

1. Any person, specific class of persons or entity that believes they have been subjected to discrimination on an FHWA-related activity or program as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, can file a formal complaint with the Tucson Department of Transportation. A copy of the Complaint Form may be accessed electronically at: <https://www.tucsonaz.gov/tdot/title-vi-civil-rights>
2. The complaint must be filed within 180 days of the alleged discrimination, and include the date the alleged discrimination became known to the complainant or the last date of the incident.
3. Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. However, the complainant may call the Tucson Department of Transportation and provide the allegations by telephone for transcription. Once transcribed the Tucson Department of Transportation will send the written complaint to the complainant for correction and signature.
4. A complaint should contain at least the following information:
 - a. A written explanation of what has happened;
 - b. A way to contact the complainant;
 - c. The basis of the complaint (e.g., race, color, national origin);
 - d. The identification of a specific person/people and the respondent (e.g., agency/organization) alleged to have discriminated;
 - e. Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal Highway Administration financial assistance; and is a consultant, contractor or sub-recipient of the Tucson Department of Transportation and
 - f. The date(s) of the alleged discriminatory act(s).

TITLE VI NON-DISCRIMINATION PLAN

5. Upon receipt of a completed complaint, the Tucson Department of Transportation will forward all FHWA Title VI complaints to Arizona Department of Transportation (ADOT) Civil Rights Office (CRO) within 72 hours.
6. ADOT CRO will forward all FHWA Title VI complaints to the FHWA Division Office.
7. All Title VI complaints received by the FHWA Division Office will be forwarded to the FHWA Office of Civil Rights for processing and potential investigation.
8. If the FHWA Office of Civil Rights determines a Title VI complaint against a sub-recipient can be investigated by ADOT CRO, the FHWA Office of Civil Rights may delegate the task of investigating the complaint to ADOT CRO. ADOT CRO will conduct the investigation and forward the Report of Investigation to the FHWA Office of Civil Rights for review and final disposition.
9. The disposition of all Title VI complaints will be undertaken by the FHWA Office of Civil Rights, through either (1) informal resolution or (2) issuance of a Letter of Finding of compliance or noncompliance with Title VI. A copy of the Letter of Finding will be sent to the FHWA Division Office.

ADOT Civil Rights Office
206 S. 17th Avenue, Mail Drop 155A
Phoenix, AZ 85007
Email: civilrightsoffice@azdot.gov
602.712.8946
602.239.6257 FAX

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
Email: CivilRights.FHWA@dot.gov
202-366-0693
202-366-1599 FAX

TITLE VI NON-DISCRIMINATION PLAN

To file a complaint or with assistance filing a complaint contact:

Jesse Soto, TDOT Title VI Coordinator
TDOT Public Information & Involvement
201 North Stone Avenue
Tucson, Arizona 85701
(520) 791-4371

<https://www.tucsonaz.gov/tdot/title-vi-civil-rights>

In order for TDOT to investigate, a Complaint of Title VI Discrimination Form must be completed. A TDOT staff member may assist the complainant with documenting the issues if necessary. In order to ensure an accurate and expeditious process, the following guidelines must be met:

1. Complaint shall be in writing and signed by the complainant(s) and must include complainant(s)' name, address and phone number.
2. Provide date of the alleged act of discrimination; date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct.
3. Present a detailed description of the issues including names and job titles of those individuals perceived as parties in the complained-of-incident.
4. Allegations received by fax or email will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to submit a signed, original copy of the fax or email transmittal in person or via U.S. mail.
5. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A Complaint of Title VI Discrimination Form will be forwarded to the complainant to complete, sign and return to TDOT for processing.
6. Once the Complaint of Title VI Discrimination Form is received, the TDOT Coordinator will log the complaint and review the complaint for completeness of information.
7. If the Title VI Discrimination complaint is found to be outside of TDOT's jurisdiction, the Coordinator will forward the complaint to the appropriate agency and work with the agency to ensure that the complaint is filed correctly.
8. If the Title VI discrimination complaint is within TDOT jurisdiction, TDOT will submit the complaint to Arizona Department of Transportation's (ADOT) Civil Rights Office (CRO).

TITLE VI NON-DISCRIMINATION PLAN

Items that should not be considered a formal complaint: (unless the items contain a signed cover letter specifically alleging a violation of Title VI) include but are not limited to:

1. An anonymous complaint that is too vague to obtain required information
2. Inquiries seeking advice or information
3. Courtesy copies of court pleadings
4. Newspaper articles
5. Courtesy copies of internal grievances

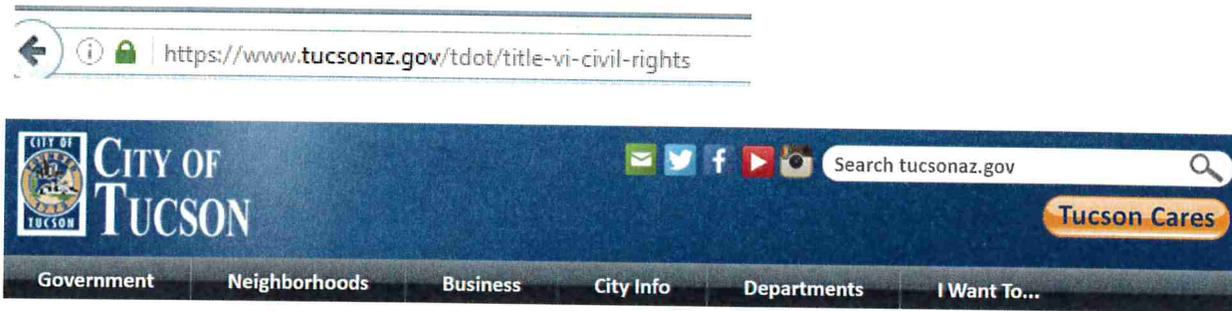
- **Records**

All records and investigative working files are maintained in a confidential area. Records are kept for three years. The complaint log will be maintained by the Title VI coordinator in a binder. All other documentation will be filed by complaint year and number.

APPENDIX DOCUMENTS

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX A - TITLE VI ONLINE RESOURCES/COMPLAINT FORM



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 TDOT's main office at the Public Works Building, 201 N. Stone Ave., 6th Floor, Tucson, AZ 85701. TDOT does not accept confidential information, such as this complaint, via e-mail.

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

TITLE VI NON-DISCRIMINATION PLAN



TUCSON DEPARTMENT OF TRANSPORTATION COMPLAINT OF TITLE VI & ADA DISCRIMINATION

Tucson Department of Transportation (TDOT), 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 TDOT.

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:

JESSE SOTO
TDOT TITLE VI /ADA COORDINATOR
201 N. Stone Ave., 5th Floor, Tucson, AZ 85701
520-791-4259 (PHONE), 520-791-4608 (FAX)
Jesse.Soto@tucsonaz.gov

Departamento de Transporte de Tucson (TDOT), 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 TDOT. Le pedimos la siguiente información para poder procesar su queja.

Si necesita ayuda para llenar este formulario, por favor, pónganse en contacto con TDOT.

Entregue el formulario con su firma y paginas adicionales a:

JESSE SOTO
TDOT TITLE VI /ADA COORDINATOR
201 N. Stone Ave., 5th Floor, Tucson, AZ 85701
520-791-4259 (PHONE), 520-791-4608 (FAX)
Jesse.Soto@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

(If someone other than the complainant / si no es la misma que el reclamante)

Name /Nombre

Street Address/Dirección

City/Ciudad

State/Estado

Zip/Código Postal

Telephone/Numero de Teléfono

Email Address/Dirección de Correo Electrónico

TITLE VI NON-DISCRIMINATION PLAN

**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 THE 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 and 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 le 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

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX C – CITY OF TUCSON ADMINISTRATIVE DIRECTIVE 2.01-1D



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY	NUMBER 2.01-1D	PAGE 1 of 4
	PAGE ISSUE DATE July 1, 2007	

I. PURPOSE

To implement the Language Communication Skill Compensation Program established by the Mayor and Council (Tucson City Code [TCC] Section 10-33).

II. POLICY

Employees shall receive additional compensation per pay period in accordance with the Language Communication Skill Compensation Program established by the Mayor and Council (TCC Section 10-33).

III. EMPLOYEES ELIGIBLE TO RECEIVE SECOND LANGUAGE PAY

A. Employees meeting the following language communication skills may be eligible to receive second language pay:

1. Full-time probationary or permanent employees who use a language other than English for a minimum of five percent (5%) of their work week (two [2] hours per forty [40] hour work week) while interacting with the public in the performance of their duties if approved by the department director; or
2. Full-time probationary or permanent employees who use a language other than English less than the five percent (5%) minimum and occupy a position specifically designated for language skills compensation by a department director and formally approved by the Human Resources Director; or
3. Part-time probationary or permanent employees 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.

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

1. The need for number of positions designated. (Two [2] or more positions within the same classification at the same location will not generally be considered essential to effective and efficient interactions with the public).
2. 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 more than five percent (5%) of their work week.
3. Whether any interactions with the public in performance of the duties of the positions are significant to assigned duties, or only ancillary thereto.

TITLE VI NON-DISCRIMINATION PLAN



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY	NUMBER 2.01-1D	PAGE 2 of 4
	PAGE ISSUE DATE July 1, 2007	

4. Whether the use of another language is essential to the effective and efficient provision of services to the public.
- C. Designation for Second Language Pay, a position may be designated for language skills compensation only when:
1. The position is within a classification which has significant interaction with the public; and
 2. The use of a second language other than English is not less than five percent (5%); and
 3. The position has been justified, documented and designated by a department director as a position where the use of a second language is essential to interactions with the public permitting effective and efficient provision of services to the public; and,
 4. The position has been approved by the Human Resources Director for designation as a language skills compensation position.

IV. ADMINISTRATION OF SECOND LANGUAGE PAY PROGRAM

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

- A. Confirmation of the conversational proficiency related to the services provided by the employee's department/division upon entry into the program, with all program participants being re-tested between November 1, 2007 and November 1, 2009.
- B. Processing of a written request form (hard copy or electronic) necessary to add or delete participants from the program, as required, based on changes in work assignments that cause employees to meet or not to meet the criteria of five percent (5%) usage of a second language.
- C. Subject to annual confirmation of all second-language positions by departments to Human Resources, once an employee has been approved for the additional compensation, the employee will continue to receive the additional compensation until such time as it is determined that the second language use has diminished to less than five percent (5%) of the work week or the employee is transferred to another position.
- D. Employees who transfer, promote or demote to different work assignments will not continue to receive the additional compensation unless the department director designates that the new position/assignment is eligible because the second language is used in the new position/assignment for a minimum of five percent (5%) of the work

TITLE VI NON-DISCRIMINATION PLAN



ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY	NUMBER	PAGE
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	PAGE ISSUE DATE July 1, 2007	

week or the position has been designated by a department director and approved by the Human Resources Director as a language skill compensation position.

If the new position/assignment is eligible for second language pay and the employee has been certified as conversationally proficient for purposes of this directive, the employee will not have to be re-tested, unless the conversation competency test for the new position is different than the test for the employee's previous position.

- E. 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.
- F. To ensure equitable financial benefit to all full-time employees with the requisite language skills who use a second language for less than five percent (5%) of the work week, department directors shall, where possible, rotate employees through all language-designated positions.

V. SECOND LANGUAGE PAY RATES:

<u>Employee Group</u>	<u>Amount per Pay Period</u>
Employees not eligible for representation	\$30.00
American Federation of State, County and Municipal Employees (AFSCME) – eligible (employees labor and trades)	\$25.00
Communication Workers of America/Tucson Association of City Employees (CWA/TACE) – eligible employees (white collar)	\$30.00
Tucson Fire Fighters Association (TFFA) – eligible	\$25.00
Tucson Police Officers Association (TPOA) – eligible	\$30.00

Forms (Attached to AD 2.01-1)

None

References

Tucson City Code Chapter 10

TITLE VI NON-DISCRIMINATION PLAN



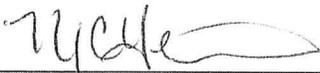
ADMINISTRATIVE DIRECTIVE

SUBJECT SECOND LANGUAGE PAY	NUMBER 2.01-1D	PAGE 4 of 4
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Review Responsibility and Frequency

The Human Resources Director will review this directive annually, based on date of publication

Authorized



City Manager

12/5/07

Date

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX D – CITY OF TUCSON ADMINISTRATIVE DIRECTIVE 2.05-9



ADMINISTRATIVE DIRECTIVE

SUBJECT SERVICES FOR LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY (LEP)	NUMBER 2.05-9	PAGE 1 of 3
	PAGE ISSUE DATE July 14, 2008	

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 an Limited English Proficiency (LEP) Liaison and notify the Office of Equal Opportunity Programs (OEOP) 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.

TITLE VI NON-DISCRIMINATION PLAN



ADMINISTRATIVE DIRECTIVE

SUBJECT SERVICES FOR LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY (LEP)	NUMBER 2.05-9	PAGE 2 of 3
	PAGE ISSUE DATE July 14, 2008	

- 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.

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 _____ (this should 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:

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

VI. OEOP ROLE AND RESPONSIBILITIES

TITLE VI NON-DISCRIMINATION PLAN

Attachment A
AD 2.05-9



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

TITLE VI NON-DISCRIMINATION PLAN



Attachment B

AD 2.05-9

Language Identification Flashcard ✓

<input type="checkbox"/> Arabic	أنا أتحدث اللغة العربية
<input type="checkbox"/> Armenian	Ես խոսում եմ հայերեն
<input type="checkbox"/> Bengali	আমি বাংলা কথা বোলতে পারী
<input type="checkbox"/> Cambodian	ខ្ញុំនិយាយភាសាខ្មែរ
<input type="checkbox"/> Chamorro	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro
<input type="checkbox"/> Dinka	Ringp êkênê yic tē yijam nē thunjäy ye tók, ku kor raan Bì yī geer thok.
<input type="checkbox"/> Simplified Chinese	如果你能读中文或讲中文，请选择此框。
<input type="checkbox"/> Traditional Chinese	如果你能讀中文或講中文，請選擇此框。
<input type="checkbox"/> Croatian	Govorim hrvatski
<input type="checkbox"/> Czech	Mluvím česky
<input type="checkbox"/> Dutch	Ik spreek het Nederlands
<input type="checkbox"/> English	I speak English

TITLE VI NON-DISCRIMINATION PLAN

Attachment B
AD 2.05-9

Language Identification Flashcard ✓

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

TITLE VI NON-DISCRIMINATION PLAN

Attachment B
AD 2.05-9

Language Identification Flashcard ✓

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

TITLE VI NON-DISCRIMINATION PLAN

Attachment B
AD 2.05-9

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



TITLE VI NON-DISCRIMINATION PLAN

APPENDIX E – 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
 Native Hawaiian/Other Pacific Islander
 Asian
 Hispanic/Latino
 White

AGE: **SEX:**

Under 20 Female
 21-39 Male
 40-64
 65+

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

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

By completing this voluntary survey, TDOT will be able to determine who attends its public meetings and how the department can improve participation. The survey will also help TDOT 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
 May 2017

ENCUESTA PARA IDENTIFICARSE
 Gracias por participar en esta reunión pública.
 Por favor tómese unos minutos para ayudarnos
 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/Otra Isla del Pacifico ative
 Asiático
 Hispano/Latino
 Caucásico/Blanco

EDAD: **SEXO:**

Menos de 20 Femenino
 21-39 Masculino
 40-64
 65+

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

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

TÍTULO 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 piel u 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
 May 2017

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX F – REQUIRED SET UP FOR PUBLIC MEETINGS

As per annual training. Distributed during annual training. Email reminders. On the intranet for employees. <https://intranet.tucsonaz.gov/tdot/employee-relations-and-development>

City of Tucson
Department of Transportation

If you are working with a Public Relations firm, they will have this ready at the meeting.

If you are leading the Public Meeting, meet with Karen Rahn to gather the required set-up of Title VI materials.

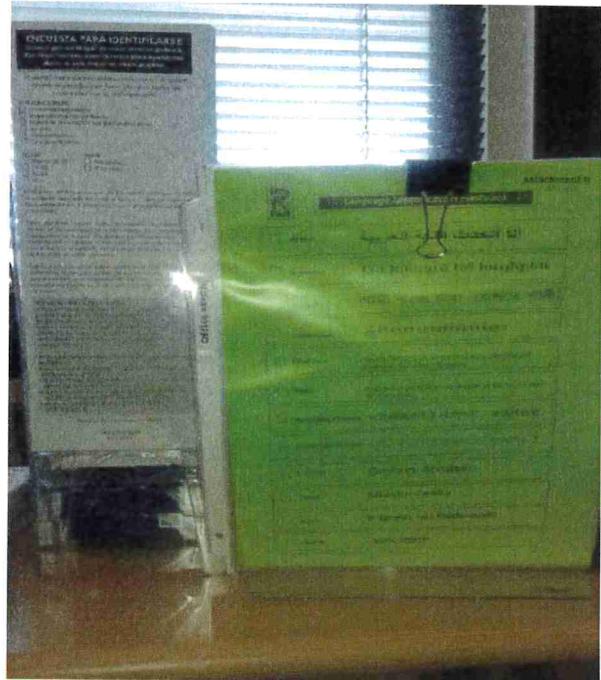


Required Set-up

1. Brochures in English/Spanish
2. Self-identification Survey Cards (English/Spanish two sided)
3. Poster to display "Notice to the Public"
4. Attached to the back of the poster are the "Language Identification Flashcards"
5. Box, basket or some other place to return cards that have been filled out

Updated 05/19/2017 d.sotelo

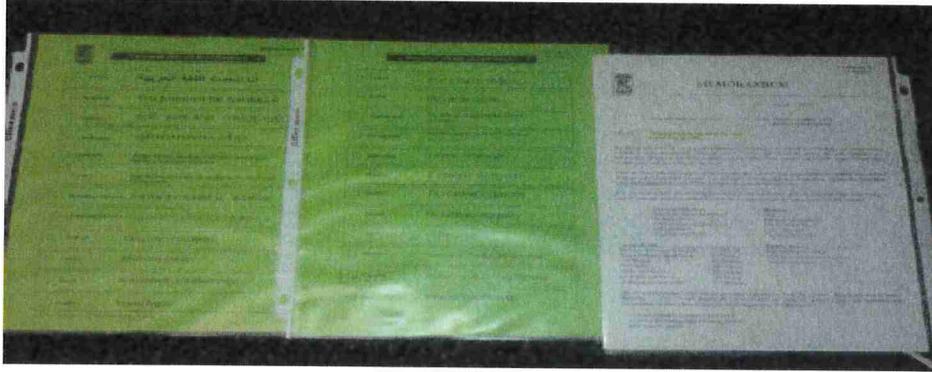
City of Tucson
Department of Transportation



The back of poster will have the "Language Identification Flashcards" attached.

TITLE VI NON-DISCRIMINATION PLAN

City of Tucson
Department of Transportation



How to use the "Language Identification Flashcards"

1. If someone approaches you and speaks a language you do not understand, show them the cards. They will be able to identify the language they need an interpreter for.
2. The memorandum lists the procedures for obtaining a language interpreter and/or translator.
3. Document the accommodation on your required "Public Meeting Summary Form"

APPENDIX G – CHECKLIST AND DATA COLLECTION FOR PUBLIC MEETINGS

Public Meeting Summary Form

Instructions for Project Manager:

1. Fill out this form as you prepare for your public meeting (to include public hearing, open house or town hall; not required for ribbon cuttings or ceremonial events).
2. Once the public meeting has been completed, return this form to Jesse Soto along with all collected Title VI Survey Forms within 14 days of your public meeting.

Project Name _____
Project Manager _____
Purpose of Public Meeting _____
Date _____
Time _____
Location _____
Public Relations Firm? Gordley Kaneen Geo & Assoc. None

Before the Meeting-

- Ensure mailing and website postings have the required statement “If you require a foreign language interpreter...” **Document any requests for accommodations & notify Jesse.**
- Determine the department vital documents and provide them in languages based on the LEP population to be served.
- Work with Jesse Soto prior to sending out invitations to ensure that the public meeting is posted on our social media pages, internet and new releases.

During the Meeting-

- Display Title VI Poster/Brochures
- Make Title VI Survey Forms Available for Participants
- Count the total number of attendees _____

After the Meeting-

Turn this form into Jesse Soto along with collected Title VI Survey Forms.

If possible take pictures of display & email to Jesse.

Where to find this form and additional resources-

<https://intranet.tucsonaz.gov/tdot/employee-relations-and-development>

<https://www.tucsonaz.gov/tdot/title-vi>

TITLE VI NON-DISCRIMINATION PLAN

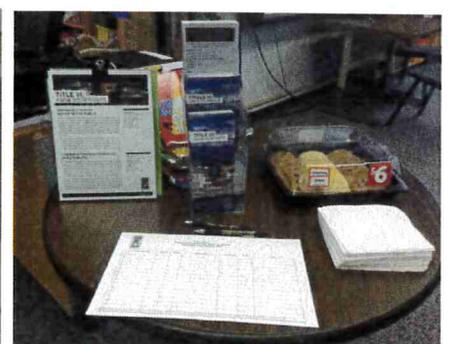
APPENDIX H – SAMPLE DATA COLLECTION FOR ANNUAL TITLE VI REPORT

2019 Public Meeting Summary Form Log
Tucson Department of Transportation

Project Name	Project Manager	Date	Approx. Attendance	Number of Survey Cards Returned	African Amer.	Amer. Indian	Asian/Pacific Islander	Hispanic/Latino	White	Other	Female	Male	AGE: Under 20	AGE: 21 - 39	AGE: 40 - 64	AGE: 65+
2017 Public Safety Tax Oversight Commission	Amber Kerwin	01/14/2019	21	0												
Houghton Road Corridor	Michael Marietti		12	12	1		1	3	7		9	3		1	9	2
Liberty Bike Boulevard	Blanca Espino	03/06/2019	16	0												
2012 Bond Oversight Commission	Michael Graham	03/11/2019	31	0												
2017 Public Safety Tax Oversight Commission	Amber Kerwin	04/08/2019	16	0												
Houghton Road Corridor	Michael Marietti	05/16/2019	125	6				1	4	1		5		1	1	4
2012 Bond Oversight Commission	Michael Graham	06/03/2019	19	0												
South 12th Ave Complete Streets Project	C.T. Revere	06/13/2019	50	2				1	1		2			1	1	
2018 Parks + Connection Bond Oversight Commission	Ann Chanecka	06/17/2019	17	0												
Timrod Bike Boulevard	Andy Bemis	06/25/2019	10	0												
Arcadia Bike Boulevard Open house	Andy Bemis	06/26/2019	14	0												
South 12th Ave Complete Streets Project	Jesse Soto	07/11/2019	35	0												

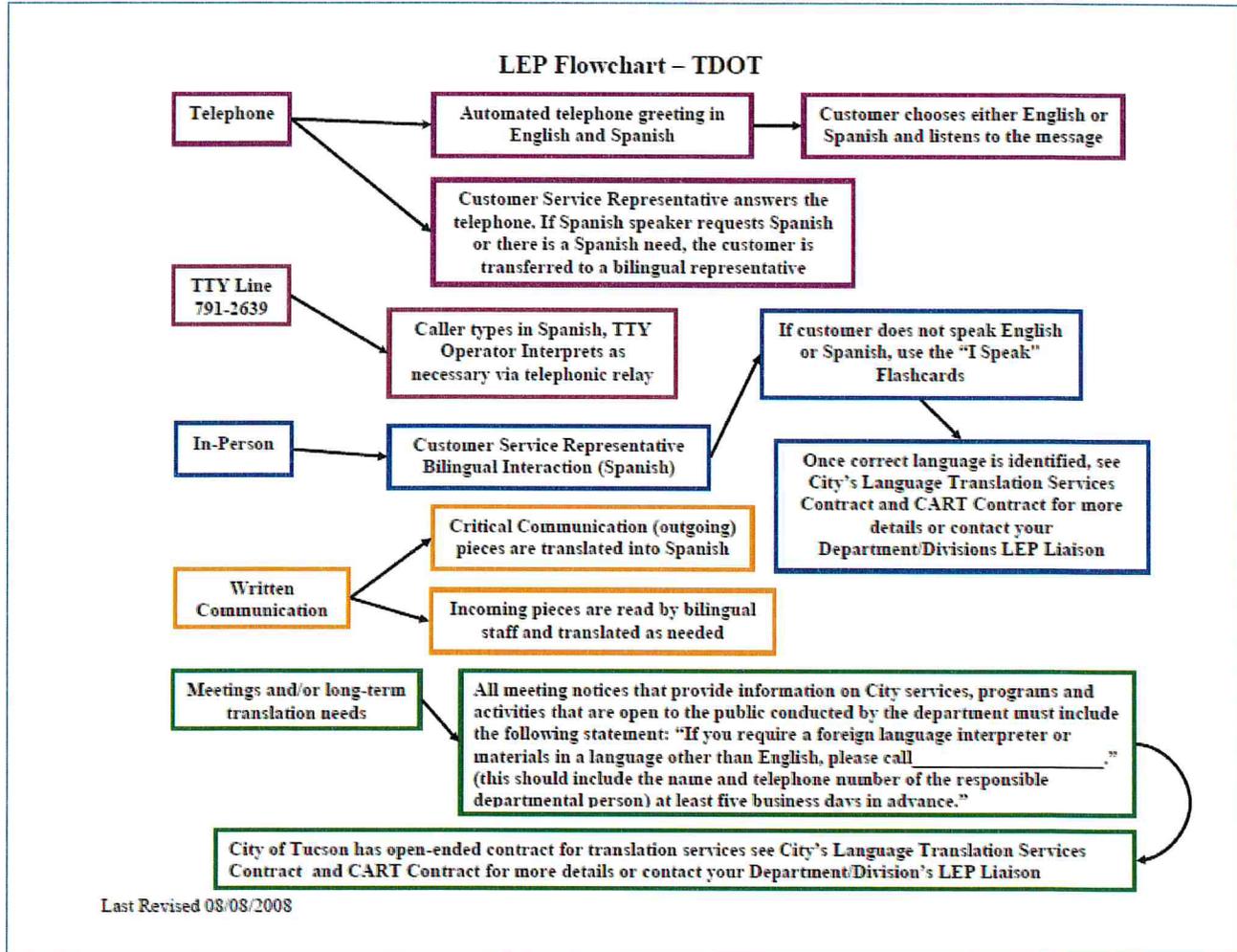
07/25/19 JK

Sample Public Meetings



TITLE VI NON-DISCRIMINATION PLAN

APPENDIX I – LEP FLOWCHART



TITLE VI NON-DISCRIMINATION PLAN

APPENDIX J – TDOT EMPLOYEES RECEIVING SECOND LANGUAGE PAY

**City of Tucson
Pay Register by Pay Period**

Appt ID	Employee Name	Civil Service	Category	Event
	VALENZUELA, BLANCA ESTELLA	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	RUNYAN, CHRISTINA A	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	CAHILL, JOHN ANDREW	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	CARRANZA, CLARISSA K	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	ORTEGA, MANUEL M	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	LEYVA, FRANCISCO ARCEO	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	CRUZ, MARIA E	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	KEENA, JOZETT ALEXANDRIA	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	SHENK, FABIAN BROOK	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	RAMIREZ, MARYLOU R	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	INZUNZA, MARIA LUCINA	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	MEDINA, ISABEL D	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE
	FLORES, ANGEL PABLO	PERM-PERM FT	2LANG-2ND LANGUAGE	2LANG-2ND LANGUAGE

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX K – SAMPLE BROCHURES

Providing Services to All People Regardless of Race, Color, or National Origin

Limited English Proficiency

What Federal Agencies and Federally Assisted Programs Should Know about Providing Services to LEP Individuals

For information on LEP and detailed agency-specific guidance, go to www.LEP.gov

For more information go to www.usdoj.gov/crt/cear

U.S. Department of Justice
Civil Rights Division
Coordination and Review Section - NVA
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Title VI Hotline
1-888-TITLE-06 (1-888-848-5306) (Voice/TTY)

<p>The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to develop creative solutions to address the needs of this ever-growing population of individuals whose primary language is not English.</p> <p>Limited English Proficiency—LEP</p> <p>Who is a Limited English Proficient Person? Persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.</p> <p>Who Must Comply and Who Can be Found to Violate? All programs and operations of entities that receive assistance from the federal government (i.e. recipients), including:</p> <ul style="list-style-type: none">• State agencies• Local agencies• Private and nonprofit entities• Subrecipients (entities that receive federal funding from one of the recipients listed above) also must comply. <p>All programs and operations of the federal government also must comply.</p>	<p>LEP Self-Assessment</p> <p>Recipients Who are the LEP individuals? This section is the LEP Self-Assessment. The purpose of this section is to identify the needs of LEP individuals who are not able to read, speak, write, or understand English.</p> <p>The United States Department of Justice (DOJ) issued the first set of national agency instructions to recipients based on a person's ability to read, speak, write, or understand English.</p> <p>Recipients and Federal Assistance Entities that receive federal assistance from the federal government (i.e. recipients) must comply with the LEP Self-Assessment. This includes:</p> <ul style="list-style-type: none">• Public housing entities that receive federal assistance from the federal government.• Entities that receive federal assistance from the federal government.• Entities that receive federal assistance from the federal government. <p>The United States Department of Justice issued national agency instructions to recipients.</p>	<p>OBLIGATIONS</p> <p>Four-Factor Analysis Recipients of federal financial assistance have an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important benefits, programs, information, and services. (The federal government has the same obligations as a result of Executive Order 13166.) The starting point is an individualized assessment that balances the following four factors:</p> <ol style="list-style-type: none">1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee/recipient;2. The frequency with which LEP individuals come in contact with the program;3. The nature and importance of the program, activity, or service provided by the program to people's lives; and4. The resources available to the grantee/recipient and costs. <p>Elements of an Effective LEP Policy Elements that may be helpful in designing an LEP policy or plan:</p> <ul style="list-style-type: none">• Identifying LEP persons who need language assistance• Identifying ways in which language assistance will be provided• Training staff• Providing notice to LEP persons• Monitoring and updating LEP policy <p>Language Assistance Services</p> <ul style="list-style-type: none">• Oral interpretation services• Bilingual staff• Telephone interpreter lines• Written language services• Community volunteers
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TITLE VI NON-DISCRIMINATION PLAN



If you believe you have experienced National Origin Discrimination, or want more information, please contact:

You can also talk to the supervisor of the person you think discriminated against you. You can also talk to a community group that works on civil rights issues.

Together, we can help people get the benefits and services they need, in ways they can understand.

Sponsored by the United States Department of Agriculture, the United States Department of Health and Human Services, and the United States Department of Justice.

KNOW YOUR RIGHTS

Federal Interagency Working Group on Limited English Proficiency

Do you have trouble with English? Are you unable to speak, read, write, or understand English well? If so, you are Limited English Proficient (LEP).

Federal agencies and organizations that get money from the federal government have to take reasonable steps to help people who have trouble with English.

Sometimes, when a government agency or an organization does not help you because you are LEP, they violate the law. This is called National Origin Discrimination.

"If you are mistreated because you are LEP, it may be National Origin Discrimination."



There is a Federal law that protects your civil rights. The law is called Title VI of the Civil Rights Act of 1964.

EXAMPLES of Possible Discrimination:

1 You and many people who live in your area speak Vietnamese and often go to the hospital for emergency care. The hospital does not understand these LEP patients. Most Vietnamese patients do not understand what the hospital tells them about their medical care.

2 You call 911 to report a crime. The operator does not understand you and cannot help you.

3 Your child's school sends important information or a notice to you in English. The school knows you speak only Spanish. The school refuses to provide the information to you in Spanish and suggests instead that your child interpret the information for you.

4 You try to apply for food stamps. The application is in English. You do not understand the application. The Food Stamp office workers tell you to come back with your own interpreter.

EXAMPLES of Good Practices:

1 The hospital knows that many people who cannot understand English and speak Vietnamese live in the area. The hospital has interpreters who are ready and able to help you when you go to the hospital for emergency care.

2 You call 911 to report a crime. The operator connects you quickly to an interpreter who helps you.

3 Your child's school has many Spanish-speaking parents. The school knows you speak only Spanish. You should receive the important information or notice in Spanish.

4 The food stamp office has an interpreter, or contacts a telephone interpreter, to help you. An application in your language is given to you.

TITLE VI NON-DISCRIMINATION PLAN

Who are the authorities?

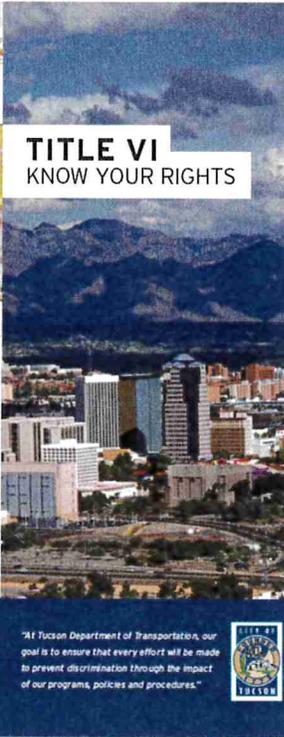
The two main authorities enabling Title VI implementation, compliance and enforcement are the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987. However, other statutes, laws, regulations, executive orders and the United States Constitution provide guidance for the effective execution of the objectives of Title VI.

THESE INCLUDE:

- Federal Aid Highway Act of 1973
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act of 1990
- Age Discrimination Act of 1975
- Uniform Relocation Act of 1970
- Executive orders 12898 and 13166

Title VI compliance

Title VI compliance is a situation where TDOT 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, TDOT is required to prevent discrimination and ensure nondiscrimination in all programs and activities whether they are federally funded or not.



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 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.

TDOT's Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964 as amended, the Civil Rights Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of the Tucson Department of Transportation (TDOT) that discrimination based on race, color, national origin, sex, age or disability shall not occur in connection with any of its programs or activities. TDOT's efforts to prevent discrimination will address, but not be limited to, a program's impact upon access, benefits, participation, treatment, services, contracting opportunities, training opportunities, investigation of complaints, allocation of funds, prioritization of projects and the functions of research, planning, project development, design, right-of-way acquisition and construction.

For more information

For questions or to file a complaint, contact:

Jesse Soto
TDOT TITLE VI COORDINATOR
 Public Works Building
 201 N. Stone Ave., 5th Floor
 Tucson, AZ 85701
 520-791-4259
 FAX 520-791-5902
 Jesse.Soto@tucsonaz.gov

tucsonaz.gov



"At Tucson Department of Transportation, our goal is to ensure that every effort will be made to prevent discrimination through the impact of our programs, policies and procedures."



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

Discrimination under our Title VI program is an action or inaction, intentional or not, through which any intended beneficiary, solely because of race, color, national origin, sex, age, disability or retaliation has been otherwise subjected to unequal treatment or impact under any TDOT program or activity. Discrimination based on the grounds referenced above limit the opportunity for individuals and groups to gain equal access to services and programs. In administering federally assisted programs and activities, TDOT 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 persons the opportunity to participate as a member of a planning, advisory or similar body
- Denying persons the opportunity to participate in the program through the provision of services, or affording the opportunity to do so differently from those afforded others

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 TDOT or indirectly through contracts or other arrangements with other agents.

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 TDOT program or activity based on race, color, national origin, sex, age, disability or retaliation.

What information is included in 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 TDOT program or activity based on race, color, national origin, sex, age, disability or retaliation.

A signed, written Title VI complaint must be filed within 180 days of the date of the alleged act of discrimination. The complaint must include the following information:

- Your name, address and telephone number. If you are filing on behalf of another person, include their name, address, telephone number and your relation to the complainant (e.g., friend, attorney, parent, etc.)
- The name and address of the agency, program or organization that you believe discriminated against you
- A description of how, why and when you believe you were discriminated against. (Include as much background information as possible about the alleged acts of discrimination.)
- Your signature

What will TDOT do with my complaint?

Upon receipt, the TDOT Civil Rights Office will determine which agency has jurisdiction to handle the complaint. If TDOT 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.

Is there speech or hearing impairment assistance for filing a complaint?

Upon request, assistance will be provided if you are limited English proficient or disabled. Any complaint may be filed using an alternate format.



TITLE VI NON-DISCRIMINATION PLAN

Autoridades

Las dos autoridades principales que hacen posible la implementación, conformidad y cumplimiento del Título VI son la Ley de Derechos Civiles de 1964 y la Ley de Restauración de 1987. Sin embargo, otros estatutos, leyes, reglamentos, ordenes ejecutivas y la Constitución de los EE.UU. proporcionan orientación para la efectiva orientación de los objetivos del Título VI. Estos incluyen:

- La Ley Federal de Asistencia Vial de 1973
- Sección 504 de la Ley de Rehabilitación de 1973
- Ley de Ciudadanos Americanos con Discapacidades de 1990
- Ley de Discriminación de Edad de 1975
- Ley de Tratado Uniforme de 1970
- Ordenes Ejecutivas 12916 y 13566

Cumplimiento del Título VI

TDOT ha implementado efectivamente todos los requerimientos del Título VI o puede demostrar que ha hecho todos los esfuerzos de buena fe posibles para lograr dar cumplimiento al Título VI. Como subcontratario de fondos de carreteras federal, TDOT es responsable de prevenir discriminación y de asegurar que no exista discriminación en ningún programa o actividad, sean financiados con fondos federales o no.



TÍTULO VI CONOCE TUS DERECHOS



Que es el Título VI?

El Título VI de la Ley de Derechos Civiles de 1964 es la ley federal que protege a los individuos y grupos de discriminación basada en raza, color y nación de origen en programas y actividades que reciben asistencia financiera federal. Sin embargo, cuando la Administración Federal de Carreteras de los Estados Unidos (FHWA, por sus siglas en inglés) hace referencia al Título VI, incluye otras provisiones de derechos civiles de estatutos federales y otras autoridades relacionadas de manera que prohíben la discriminación en programas y actividades que reciban asistencia financiera federal.

Las Normas bajo Título VI de TDOT

Conforme al Título VI de la Ley de Derechos Civiles de 1964 enmendada, la Ley de Restauración de 1987 y otras autoridades en contra de la discriminación, es la norma del Departamento de Transportación del Tucson (TDOT, por sus siglas en inglés) que discriminación basada en raza, color, nación de origen, género, edad o discapacidad no ocurrirá en ninguno de sus programas o actividades.

Los esfuerzos de TDOT para prevenir la discriminación se dirigen a, pero no serán limitados a, el impacto de un programa sobre el acceso, bienes, participación, trato, servicios, oportunidades de contratación, oportunidades de capacitación, investigación de quejas, disposición de fondos, priorización de proyectos y las funciones de planeación, desarrollo de proyectos, diseño, adquisición de derecho de vía, construcción e investigación.

Para más información

Para preguntas o para presentar una queja, comuníquese con:

Isaac Soto
TDOT TITLE VI COORDINATOR
 Public Works Building
 201 N. Stone Ave., 5th Floor
 Tucson, AZ 85701
 520-791-4259
 FAX 520-791-5902
 Isaac.Soto@tucsonaz.gov

tucsonaz.gov



"En el Departamento de Transportación de Tucson, nuestro objetivo es asegurar que cada esfuerzo haga previr discriminación a través del impacto de nuestros programas, principios y procedimientos."



Qué tipo de discriminación está prohibida bajo el programa Título VI de TDOT?

Discriminación bajo nuestro programa de Título VI es una acción o inacción, intencional o no, por medio de cualquier persona que sería beneficiada, haya sido sujeto a trato o impacto desigual bajo cualquier programa o actividad de TDOT únicamente por su raza, color, nación de origen, género, edad, discapacidad o represalias.

Discriminación basada en los términos arriba mencionados les limita a grupos e individuos la oportunidad de obtener acceso equitativo a programas y servicios. En la administración de programas y actividades que reciban asistencia financiera federal, TDOT tampoco no puede discriminar directa o indirectamente, por medio de contratos o cualquier otro medio para:

- Negar servicios del programa, apoyo financiero u otros beneficios
- Proporcionando diferentes servicios, apoyo financiero u otros beneficios, o proporcionándolos de manera diferente a como se les proporciona a otros
- Segregar o tratar por separado a grupos o individuos de cualquier forma relacionada a la recepción de bienes y servicios
- Restringir de cualquier manera el uso o goce de cualquier ventaja o privilegio de la cual otros que reciben bienes y servicios, usan o gozan
- Negarle a alguien la oportunidad de participar como miembro de un grupo de planeación, de asesoría u otro similar
- Negarle a alguien la oportunidad de participar en el programa mediante la proporción de servicios o dándole la oportunidad de hacerlo de manera diferente de como se les proporcionó a otros

Programas incluidos

Los programas que reciban asistencia financiera federal incluyen: cualquier proyecto vial, programa o actividad para la prestación de bienes y servicios. Tales programas incluyen educación o capacitación, oportunidades de trabajo, salud, asistencia pública, rehabilitación, viviendas y otros servicios, ya sea que hayan sido proporcionados directamente por TDOT o indirectamente a través de contratos u otros arreglos con otros representantes.

¿Quién puede presentar una demanda Título VI?

Cualquier individuo(s) que alegue(n) que han(s) sido(s) sujetos a discriminación o impactados de manera desfavorable bajo cualquier programa o actividad de TDOT basados en raza, color, nación de origen, género, edad, discapacidad o represalias puede presentar una demanda Título VI.

Que información se incluye en una demanda Título VI?

Una queja Título VI por escrito y firmada debe presentarse dentro de los 180 días de la fecha en que se alega que la discriminación ocurrió. La demanda debe incluir la siguiente información:

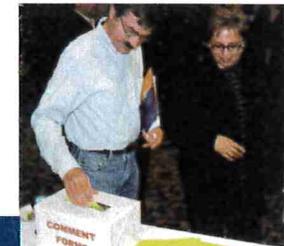
- Su nombre, dirección y teléfono. Si usted está presentando la demanda en representación de una tercera persona, incluya su nombre, dirección y teléfono y la relación que tiene usted con la persona agredida (ej. amigo, abogado, padre, etc.)
- El nombre y la dirección de la agencia, programa u organización que usted cree discriminó en su contra
- Una descripción de cómo, porque y cuando usted cree que discriminaron en su contra. Incluya la mayor cantidad de información que pueda sobre de los actos de discriminación que alega
- Su firma

Que hará TDOT con mi demanda?

Al recibir su demanda, la Oficina de Derechos Civiles de TDOT determinará que agencia tiene jurisdicción para manejar la demanda. Si TDOT no tiene jurisdicción para manejar la demanda, se le enviará a la agencia apropiada. Las alegaciones se investigarán y se intentará resolver cualquier, si es que se encuentran. Si los esfuerzos para resolver las violaciones no resultan exitosos, se dará inicio a procedimientos disciplinarios para asegurar el cumplimiento por parte del receptor demandado.

Hay ayuda para presentar la demanda para personas con problemas de oír o de habla?

Se proveerá asistencia a personas con habilidad limitada en inglés o discapacidad si lo solicitan. Una demanda puede ser presentada usando un formato alternativo. Para presentar una demanda Título VI, se puede comunicar a la Oficina de Derechos Civiles al número que se menciona a continuación.



APPENDIX L – SCREENSHOT OF MULTILINGUAL TDOT WEBSITE

This screenshot shows the City of Tucson website with the Google Translate extension active, displaying the page in Spanish. The page title is "Solicitud Calle Mantenimiento Mejora". A yellow arrow points to the "Select Language" dropdown menu, which has "Spanish" selected. The form includes fields for "Ubicación específica (calle, intersección, dirección)", "Dirección", and "Teléfono".

Departmento de Transporte
 Modern Street Car
 Servicios de Transporte
 Bicicletas y Peatonal
 Programa
 Programa de Remoción de Graffiti
 Centro de Recursos TDOT
 Calles y Mantenimiento de Tráfico
 > Solicitud Calle Mantenimiento Mejora
 Ingeniería de tráfico
 Construcción New Street

Solicitud Calle Mantenimiento Mejora
 Ayuda a la Ciudad identificar calle, iluminación, drenaje, señalización, y otras mejoras relacionadas con el transporte, tales como:

- **mantenimiento** : llenar baches y grietas, barrer, vegetación recorte
- **control de tráfico** : firma, la creación de bandas carril, cruzando la reparación de señales
- **reconstrucción** : asfalt pavimentación, servicios públicos, bordillos, rampas y aceras

Ubicación específica (calle, intersección, dirección) *

English Chinese (Traditional) German Korean Russian Vietnamese
 Afrikaans Croatian Greek Latvian Serbian Welsh
 Albanian Czech Haitian Creole Lithuanian Slovak Yiddish
 Arabic Danish Hebrew Macedonian Slovenian
 Armenian Dutch Hindi Malay **Spanish**
 Azerbaijani Estonian Hungarian Maltese Swahili
 Basque Filipino Icelandic Norwegian Swedish
 Belarusan Finnish Indonesian Persian Thai
 Bulgarian French Irish Polish Turkish
 Catalan Galician Italian Portuguese Ukrainian
 Chinese (Simplified) Georgian Japanese Romanian Urdu

Spanish

Dirección

Teléfono

This screenshot shows the City of Tucson website with the Google Translate extension active, displaying the page in English. The page title is "Street Maintenance Improvement Request". A yellow arrow points to the "Select Language" dropdown menu, which has "English" selected. The form includes fields for "Specific Location (street, intersection, direction)", "Your Name", "Address", "Phone", and "Email".

Department of Transportation
 Modern Street Car
 Transit Services
 Bicycle & Pedestrian Program
 Graffiti Removal Program
 TDOT Resource Center
 Streets & Traffic Maintenance
 > Street Maintenance Improvement Request
 Traffic Engineering
 New Street Construction

Street Maintenance Improvement Request
 Help the City identify street, lighting, drainage, signage, and other transportation related improvements such as:

- **maintenance**: filling potholes and cracks, sweeping, trimming vegetation
- **traffic control**: signing, lane striping, crossing signal repair
- **reconstruction**: asphalt paving, utilities, curbs, ramps and sidewalks

Specific Location (street, intersection, direction) *

> Select Language Chinese (Traditional) German Korean Russian Vietnamese
 Afrikaans Croatian Greek Latvian Serbian Welsh
 Albanian Czech Haitian Creole Lithuanian Slovak Yiddish
 Arabic Danish Hebrew Macedonian Slovenian
 Armenian Dutch Hindi Malay Spanish
 Azerbaijani Estonian Hungarian Maltese Swahili
 Basque Filipino Icelandic Norwegian Swedish
 Belarusan Finnish Indonesian Persian Thai
 Bulgarian French Irish Polish Turkish
 Catalan Galician Italian Portuguese Ukrainian
 Chinese (Simplified) Georgian Japanese Romanian Urdu

Select Language

Your Name

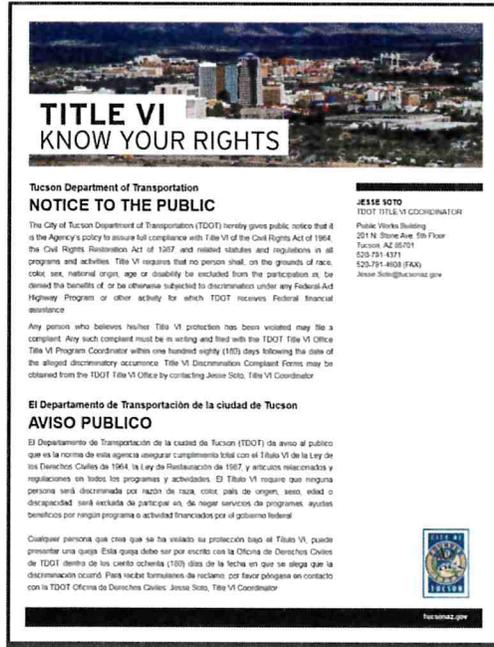
Address

Phone

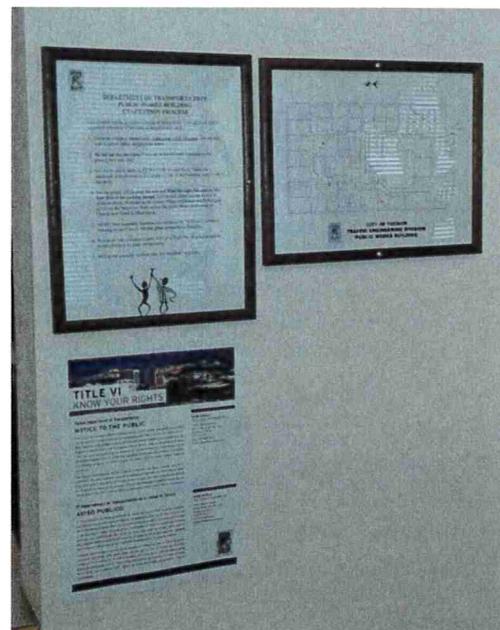
Email

TITLE VI NON-DISCRIMINATION PLAN

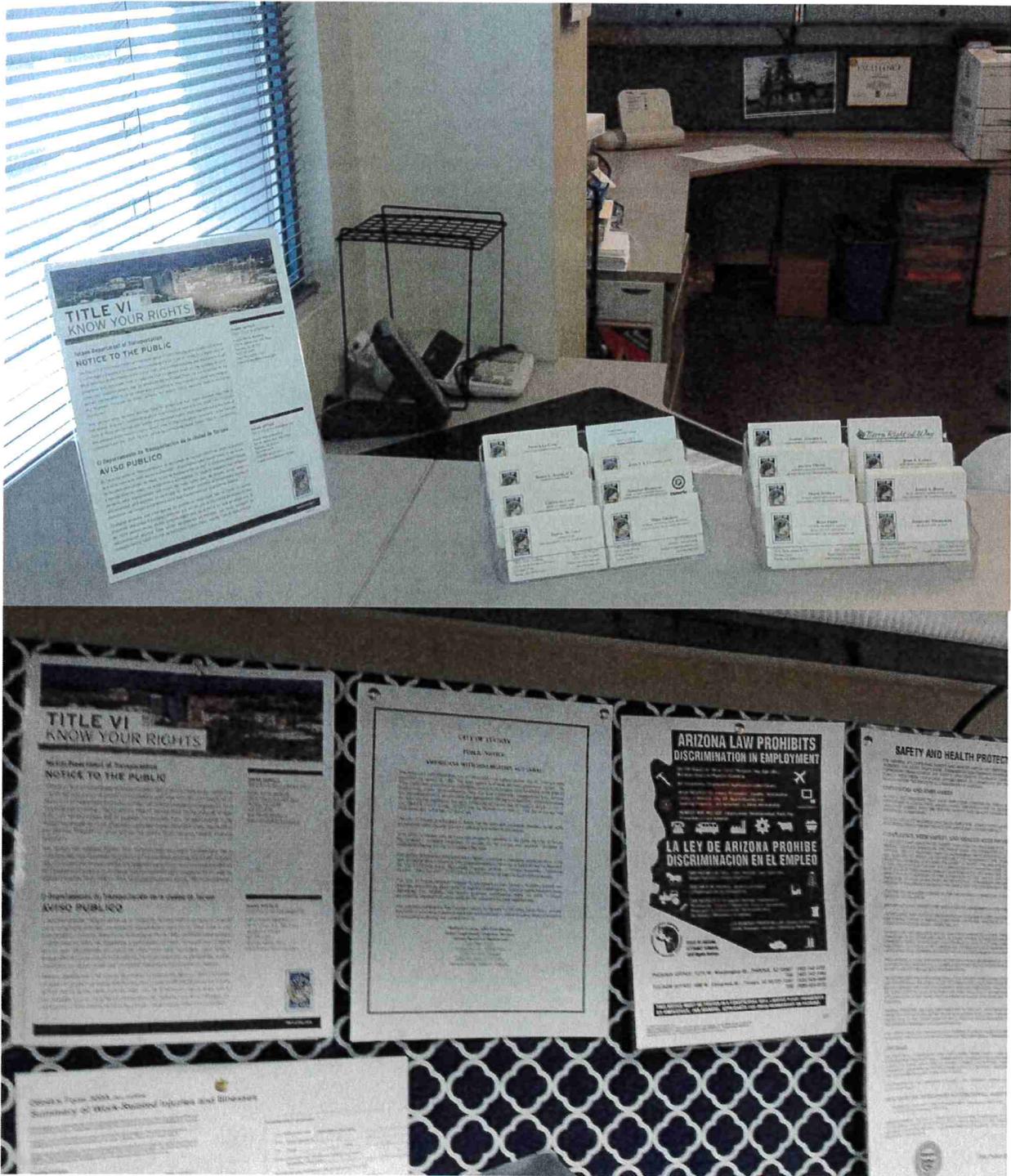
APPENDIX M – TITLE VI “KNOW YOUR RIGHTS” POSTER



Poster is hanging in various locations throughout TDOT including:
Public waiting areas on the 4th, 5th & 6th floors of the Public Works building
Park Tucson lobby
Transit lobby
Streets & Traffic Maintenance lobby



TITLE VI NON-DISCRIMINATION PLAN



TITLE VI NON-DISCRIMINATION PLAN

APPENDIX N – CITY OF TUCSON FHWA CERTIFICATION ACCEPTANCE REPORT

City of Tucson CA Assessment Status Report

Submittal Items	ADOT Schedule Date	CA Target Date	Actual Submittal Date	Completed Review
Procurement of Consultant	December-15	12/31/2015	11/30/2015, 12/30/2015 & 1/4/2016 & 4/29/16	Awaiting Resubmittal from City
Procurement of Materials and/or Install	December-15	12/31/2015	12/30/2015 & 1/4/2016	Complete
Materials and Pavement Design Guideline	January-16	1/29/2016	1/29/2016	Complete
Design Exceptions Procedures	January-16	1/29/2016	1/29/2016	Complete
Materials Quality Assurance Program	January-16	1/29/2016	1/29/2016	Complete
ROW Procedures	January-16	1/29/2016	1/29/2016	Complete
Title VI Program Plan	January-16	1/29/2016	10/9/2015	Complete
ADA Transition Plan	January-16	1/29/2016	10/9/2015	Complete
DBE Procedures	January-16	1/29/2016	2/5/2016	Complete
Project Delivery Manual	March-16	3/31/2016	3/25/2016	Complete
Staffing Plan	March-16	3/31/2016	3/9/2016	Complete
Communication Plan	March-16	3/31/2016	3/14/2016	Complete
Training Program	March-16	3/31/2016	12/17/2015	Complete
Bid Analysis and Award Procedures	March-16	3/31/2016	3/31/2016	Complete
Subcontractor Approval Procedures	April-16	4/29/2016	4/15/2016 5/16/16	Complete
Financial Management Procedures	April-16	4/29/2016	4/29/2016	Need Sample Financial Report
Audit, Oversight and Inspection Procedures	April-16	4/29/2016	4/29/2016	Awaiting Resubmittal from City

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX O – CITY OF TUCSON OEOP & TDOT WEBSITE SAMPLES

TDOT Intranet (for employees only)

The screenshot displays the TDOT Intranet website. At the top left is the City of Tucson logo. A navigation bar includes links for Benefits, Career and Training, Departments (highlighted), Payroll, and Policies and Directives. The main content area is titled "Employee Relations and Development" and is divided into several sections: TDOT (with links to Employee Dashboard, Administrative Services, Employee Relations and Development, Management Systems, Policies and Procedures, Public Works Security, Technology Services, Transportation Engineering, and Transportation Planning); Useful Links (including KRONOS, Jobs, The Hiring Guide, Employee Self Service, I.T. Service Desk, Online Forms and Tools, Submit an Announcement, Payroll Calendar, Safety Data Sheets, and Employee Preparedness Evacuation Maps); Power Pass Computer Training Program (with links to enrollment forms, class schedules, and navigation guides); Administrative Directives; Policies and Procedures; Forms; Title VI (with a list of documents including the 2018 Policy Statement of Non-discrimination, Title VI Flier, Self Identification Survey, Public Meeting Summary Checklist, 2018 Non-Discrimination Plan, 2019 Signed Assurances, 2018 Annual Report, 2018 TDOT Annual Training, Required Setup for Public Meeting, and Title VI Complaint form); and Continuity of Operations (with a link to the Continuity of Operations Plan).

CITY OF TUCSON

Benefits Career and Training **Departments** Payroll Policies and Directives

TDOT

- Employee Dashboard
- Administrative Services
- Employee Relations and Development**
- Management Systems
- Policies and Procedures
- Public Works Security
- Technology Services
- Transportation Engineering
- Transportation Planning

Useful Links

- KRONOS
- Jobs
 - The Hiring Guide
- Employee Self Service (goes to COT Internet)
- I.T. Service Desk
- Online Forms and Tools
- Submit an Announcement
- Payroll Calendar
- Safety Data Sheets
- Employee Preparedness Evacuation Maps

Employee Relations and Development

Power Pass Computer Training Program

- PowerPass Class Enrollment Form (pdf)
- Class Schedule for TDOT Power Pass (excel)
- How to Navigate the Class List Workbook (pdf)
- How to Find More Classes (pdf)

Administrative Directives

- All City Administrative Directives

Policies and Procedures

- Policies and Procedures
- TDOT Org. Chart (3-01-18)

Forms

- Employee Vehicle Accident Statement
- Form 100
- TDOT Training Request Form
- AZ LTAP Enrollment Request Form

Title VI

- 2018 Policy Statement of Non-discrimination
- Title VI Flier
- Self Identification Survey for Public Meetings (English and Spanish)
- Public Meeting Summary Checklist
- 2018 Non-Discrimination Plan (Updated Aug. 1, 2018)
- 2019 Signed Assurances
- 2018 Annual Report
- 2018 TDOT Annual Training
- Required Setup for Public Meeting
- Submit a Title VI Complaint (PDF form)

Continuity of Operations

- Continuity of Operations Plan

<https://www.tucsonaz.gov/tdot/title-vi-civil-rights>

CITY OF TUCSON

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Government | **Neighborhoods** | **Business** | **City Info** | **Departments** | **I Want To...**

Select Language | ▼

Department of Transportation (TDOT)

- Prop 101: Tucson Delivers
- About TDOT
 - > **Title VI / Civil Rights**
 - Travel Reduction Ordinance
 - Mural Art Pilot Program
- Road Recovery Bond Program
- Bicycle & Pedestrian Program
- Traffic Engineering
- Engineering
- Landscape
- Management Services
- Maps and Records
- Park Tucson
- Real Estate
- Regional Transportation Authority
- Small Wireless Facilities
- Special Events and Parades
- Streets & Traffic Maintenance
- Transit Services Division
- Transportation Planning
- Transportation Projects

Title VI / Civil Rights

Title VI of the Civil Rights Act of 1964 is the main legal authority for the Tucson Department of Transportation's 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.

- [Policy Statement of Non-discrimination](#)
- [Title VI Self Identification Survey \(English and Spanish\)](#)
- [2018 Non-Discrimination Plan \(Updated Aug 1, 2018\)](#)
- [2019 Signed Assurances](#)
- [2018 Annual Report](#)

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 TDOT's main office at the Public Works Building, 201 N. Stone Ave., 5th Floor, Tucson, AZ 85701. *TDOT does not accept confidential information via e-mail.*

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

Please submit complaints or questions to:

Jesse Soto
 TDOT Title VI Coordinator
 Public Works Building
 201 N. Stone Ave., 5th Floor
 Tucson, AZ 85701
 520-791-4371
 FAX 520-791-4608
Jesse.Soto@tucsonaz.gov


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商業
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交通部 (TDOT)

- 關於TDOT
- 路恢復債券計劃
- 自行車和行人計劃
- 城市測量師
- 工程
- 洪氾區管理
- 清除塗鴉計劃
- 景觀
- 管理服務
- 地圖和記錄
- 壁畫藝術試點
- 圖森園
- 房地產
- 區域交通管理局
- 小型無線設備
- 特別活動和遊行
- 兩水管理
- 街道和交通維護
- 杉林溪
- > **第六章/民權**
- 交通工程
- 運輸服務部
- 交通規劃
- 交通運輸項目
- 減少出行條例

第六章/民權

1964年民權法案的第六章是運輸的外部不歧視方案的圖森系的主要法律權威。第六章禁止接受聯邦財政援助方案或活動的種族，膚色，性別或民族出身的歧視。一旦一個機構接受聯邦資金，其所有的方案和活動都包括在內，不論其資金來源。第六章的保護傘下相關法令，總統行政命令解決少數民族和低收入人羣和服務環境正義 (EJ) 與英語能力有限 (LEP)，婦女和殘疾人的個人。

- 不歧視的政策聲明
- 第六章自我鑑定調查 (英語和西班牙語)
- 2017年非歧視計劃 (更新2017年8月1日)
- 2017年簽署的保證
- 2017年年度報告

提交標題VI投訴

任何人誰相信他或她，無論是單獨的，因為任何特定類別的人士中的一員，或與任何少數承包方面，已經經歷了由1964年民權法案第六章和民權恢復禁止的歧視1987年法案可能不收取任何費用提出申訴。正式的申訴必須親自或通過美國郵件內提交 **180日曆天** 涉嫌歧視或日期時，涉嫌歧視出名對投訴人 (一個或多個) 行為，或者出現了行為的持續過程中，在其行為已經停產日期或行為的最新實例。在此時間範圍是由49 CFR 21.11規定 (b) 中。為了您的方便，請訪問TDOT的在公共工程建設，201 N.石大街，6樓，圖森，AZ 85701.主要辦公室 *TDOT* 不接受通過電子郵件的機密信息。

- 提交標題VI投訴 (PDF格式)

請提交投訴或問題：

傑西·索托
 TDOT標題六協調員
 公共工程建設
 201 N.石大道，5樓
 亞利桑那州圖森85701
 520-791-4371
 傳真520-791-4608
 Jesse.Soto@tucsonaz.gov


Chinese (Traditional) ▼



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الإدارات
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وزارة النقل (TDOT)

حول TDOT

برنامج الطريق استعادة بوند

برنامج للمشى الدراجات و

مساحين المدينة

هندسة

إدارة السهول الفيضية

برنامج إزالة الكتابة على

الجران

المناظر الطبيعية

خدمات إدارة

الخرائط والسجلات

برنامج جدارية الفن التجريبي

بارك توكسون

العقارات

هيئة النقل الإقليمي

المراقق لاسلكية صغيرة

الأحداث الخاصة والمسيرات

إدارة مياه الأمطار

الشوارع والصيانة المرور

الشمس لينك

الباب السادس / بالحقوق

المدينة

هندسة المرور

شعبة خدمات النقل العابر

تخطيط النقل

مشاريع النقل

قانون الحد من السفر

الباب السادس / بالحقوق المدنية

الباب السادس من قانون الحقوق المدنية لعام 1964 هي السلطة القانونية الرئيسية لوزارة توكسون برامج عدم التمييز الخارجية النقل. ويحظر الباب السادس التمييز على أساس العرق أو اللون أو الجنس أو الأصل القومي في البرامج أو الأنشطة تلقي المساعدة المالية الاتحادية. مرة واحدة تقبل وكالة الأموال الاتحادية، وتغطي كافة برامجها وأنشطتها، بغض النظر عن مصدر تمويلها. القوانين ذات الصلة، في الأقليات وذوي الدخل المنخفض السكان والخدمات لهؤلاء (EI) والأوامر التنفيذية الرئاسية تحت مظلة الباب السادس تتناول العدالة البيئية والنساء والمعوقين (LEP) الأفراد مع إجابة اللغة الإنجليزية محدودة.

- بيان سياسة عدم التمييز
- الباب السادس مسح الهوية الذاتية (الإنجليزية والإسبانية)
- خطة عدم التمييز (تحديث 1 أغسطس 2017)
- تأكيدات توقيع 2017
- التقرير السنوي 2017

تقديم شكوى الباب السادس

أي شخص يعتقد أنه أو أنها، إما بشكل فردي، كما عضوا في أي فئة معينة من الأشخاص، أو في اتصال مع أي مفاول الأقليات، قد تعرض للتمييز يحظرها الباب السادس من قانون الحقوق المدنية لعام 1964 واستعادة الحقوق المدنية قانون لسنة 1987 قد رفع شكوى في أي تهمة. يجب تقديم شكوى رسمية شخصيا أو عبر البريد الولايات المتحدة في غضون 180 يوما من التعل المزعم من التمييز أو من التاريخ الذي أصبح فيه التمييز المزعم المعروف أن صاحب الشكوى (ق)، أو حيث كان هناك سلوك مستمر، التاريخ الذي أوقف سير أو أحدث مثل لفي أعمال المباني العامة، TDOT لراحتك. قم بزيارة المكتب الرئيسي، (ب) CFR 21.11 السلوك. يوصف هذا الإطار الزمني بنسبة 49 لا تعيل المعلومات السرية عبر البريد الإلكتروني TDOT. ستون اف، الطابق ال6، توسن 201 N. 85701

- (شكل) إرسال شكوى الباب السادس

يرجى تقديم شكاوى أو أسئلة إلى:

جيسي سوتو

الباب السادس TDOT منسق

ملته بناء الأشغال

201 N. 5، الطابق اف، ستون اف،

توكسون، AZ 85701

520-791-4371

FAX 520-791-4608

Jesse.Soto@tucsonaz.gov


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Departamento de Transporte (TDOT)

- sobre TDOT
- Programa de recuperación de ruta Bond
- Bicicletas y peatones Programa
- Los topógrafos de la ciudad
- Ingeniería
- Administración llanura de inundación
- Programa de limpieza de pintadas
- Paisaje
- Servicios de administración
- Mapas y registros
- Programa de Arte Mural piloto
- parque Tucson
- Bienes raíces
- Autoridad Regional de Transporte
- Pequeñas instalaciones inalámbricas
- Eventos especiales y desfiles
- Gestión de aguas pluviales
- Calles y Mantenimiento de Tráfico
- Sun Enlace
- **Título VI Derechos Civiles /**
- Ingeniería de tráfico
- División de Servicios de Tránsito
- Planificación de transporte
- Proyectos de transportes
- Ordenanza Reducción de Viajes

Título VI Derechos Civiles /

Título VI de la Ley de Derechos Civiles de 1964 es la principal autoridad legal para el Departamento de programas de no-discriminación exteriores de Transporte de Tucson. Título VI prohíbe la discriminación por motivos de raza, color, sexo u origen nacional en los programas o actividades que reciben asistencia financiera federal. Una vez que una agencia acepta fondos federales, todos sus programas y actividades están cubiertos, independientemente de su fuente de financiación. estatutos relacionados y órdenes ejecutivas presidenciales bajo el paraguas del título VI frente a la justicia ambiental (EJ) en las poblaciones minoritarias y de bajos ingresos y para aquellas personas con conocimientos limitados del Inglés (LEP), las mujeres y los discapacitados.

- Declaración de política de no discriminación
- Encuesta autoidentificación VI del título (Inglés y Español)
- 2017 Plan de No Discriminación (Actualizado hace 1 de agosto, 2017)
- 2017 Assurances Firmado
- Informe Anual 2017

Enviar una queja Título VI

Cualquier persona que cree que él o ella, ya sea individualmente, como miembro de un grupo específico de personas, o en conexión con cualquier contratista minoritario, ha sido objeto de discriminación prohibida por el Título VI Ley de Derechos Civiles de 1964 y la Restauración de Derechos Civiles Acta de 1987 puede presentar una queja sin cargo. Una queja formal debe ser presentada en persona o por correo postal dentro de **los 180 días naturales** del supuesto acto de discriminación o de la fecha en que la supuesta discriminación se dio a conocer a la demandante (s), o cuando ha habido una línea de conducta, la fecha en que se suspendió la conducta o la última instancia de la conducta. Este período de tiempo es prescrito por 49 CFR 21,11 (b). Para su comodidad, visitar la oficina principal de TDOT en el Edificio de Obras Públicas, 201 N. Ave. Piedra, Piso 6, Tucson, AZ 85701. *TDOT no acepta información confidencial a través del correo electrónico.*

- Presentar una queja Título VI (formato PDF)

Por favor, presentar quejas o preguntas a:

Jesse Soto
 Coordinador TDOT Título VI
 de Obras Públicas edificio
 201 N. Piedra Ave., 5th Floor
 Tucson, AZ 85701
 520-791-4371
 FAX 520-791-4608
Jesse.Soto@tucsonaz.gov


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TDOT אודות

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מודד סיטי

הנדסה

מנהל השטפונות

תוכנית להסרת גרפיטי

נוף

שירותי ניהול

מפות רשומות

תוכנית הפיילוט של אמנות קיר

פארק טוסון

נדל"ן

רשות התחבורה האזורית

מתחם אלחוטי קטן

אירועים ותהלוכות מיוחדים

stormwater ניהול

רחובות ואחזקת תנועה

קישור שמש

> **כותרת / לזכויות VI האזרח**

הנדסת תנועה

Transit חטיבת שירותי

תכנון תחבורה

פרויקטים תחבורתיים

פקודת הפחתת מסעות

כותרת / לזכויות האזרח VI

הכותרת השישית של חוק זכויות אזרח של 1964 היא הסמכות המשפטית העיקרית מח' טוסון של תוכניות האפליה אוסר על אפליה על בסיס גזע, צבע, מין או מוצא לאומי בתוכניות או פעילויות קבלת VI החיצוניות של התחבורה. כותרת סיוע כספי פדרלי. סוכנות אחת מקבלת כספים פדרליים, כל התוכניות והפעילויות שלה מכוסים, ללא קשר למקור המימון בקרב אוכלוסיות (EJ) לטפל צדק סביבתי VI שלהם. חוקים קשורים וצווי המבצעת לנשיאות תחת המטריה של כותרת נשים ונכים (LEP), מיעוט ובעלי הכנסה נמוכה ושירותים ליחידים בעלי שליטה באנגלית מוגבלת.

- הצהרת מדיניות של איסור הפליה
- עצמי (אנגלית וספרדית) VI סקר זהות כותרת
- Aug., 2017 עודכן לפני 1) ללא אפליה תוכנית 2017
- 2017 Assurances חתומים
- 2017 דוח שנתי

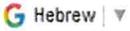
VI הגשת תלונה כותרת

כל אדם שמאמין שהוא או היא, או בנפרד, כחבר מכל סוג מסוים של אנשים, או בקשר לכל קבלן מיעוט, הועמד בפני אפליה אסורה על פי כותרת השישי של חוק זכויות האזרח של 1964 ואת שיקום לזכויות האזרח משנת 1987 רשאית בתוך **180 ימים קלנדריים** Mail להגיש תלונה ללא תשלום. תלונה רשמית תוגש באופן אישי או באמצעות ארה"ב המעשה לכאורה של אפליה או של התאריך שבו ההפליה הגטענת נודע למתלונן (ים), או שבו חלה כמובן המשך של CFR 21.11 התנהגות, המועד שבו ההתנהלות הופסקה או בערכאה האחרונה של ההתנהלות. זמן זה שקבע 49 סטון נ, קומה 6, טוסון, אריזונה 85701 Ave. בבניין עבודות ציבוריות, TDOT 201 לנוחיותכם, לבקר במשרד הראשי של TDOT. אינו מקבל מידע סודי באמצעות דואר אלקטרוני TDOT.

- VI שלח תלונת כותרת (PDF טופס)

אנא להגיש תלונות או שאלות אל:

ג'סי סוטו
 רכזת VI כותרת TDOT
 הציבוריות בניין
 Ave., 5 נ טוסון 201
 טוסון, אריזונה 85,701
 520-791-4371
 פקס 520-791-4608
 Jesse.Soto@tucsonaz.gov

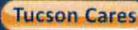


TITLE VI NON-DISCRIMINATION PLAN

OEOP Programs – City of Tucson

<https://www.tucsonaz.gov/oeop>

Secure | <https://www.tucsonaz.gov/oeop>

  Search [tucsonaz.gov](#) 

Government | Neighborhoods | Business | City Info | Departments | I Want To...

Office of Equal Opportunity Programs

Americans with Disabilities Act (ADA)
> Limited English Proficiency (LEP)
Chapter 17 Complaints

Select Language ▾

Limited English Proficiency (LEP)

Section 602 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d states that "No person in the United States shall, on the ground 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." This law was established to ensure that persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English be afforded meaningful access to programs, services and/or activities and information provided by any entity receiving federal financial assistance.

On August 11, 2000, Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" was issued to extend the requirements under Title VI to all federal agencies, programs, and activities. Executive Order 13166 also requires all federal agencies that provide financial assistance to non-federal entities to publish guidance on Title VI compliance.

The City of Tucson is committed to ensuring that it complies with the provisions set forth by Title VI and Executive Order 13166 within the City's level of authority. Each City facility has a designated LEP Liaison to assist members of the community with ensuring meaningful access to its department's programs, services/activities. The Office of Equal Opportunity Programs is responsible for monitoring the City's LEP compliance efforts.

If you feel that you have not been provided meaningful access to any City program, service/activity, contact (520) 791-4593.

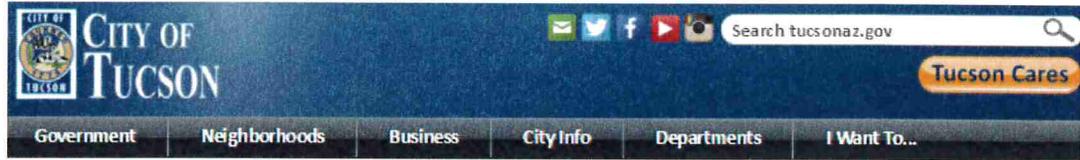
[LEP Complaint Form \(pdf\)](#)
[LEP Complaint Form SPANISH \(pdf\)](#)
[LEP Liaisons \(pdf\)](#)

<h4>Contact Information</h4> <p><i>Office of Equal Opportunity Programs</i> City Hall 255 W. Alameda, 4th Floor Tucson, AZ 85701 (520) 791-4593 Fax (520) 791-5140 TTD (520) 791-2639</p> <p><i>Independent Police Auditor & Civilian Investigator</i> City Hall 255 W. Alameda Tucson, AZ 85726-7210 (520) 837-4003 Fax (520) 791-5198</p>	<h4>Related Links</h4> <p>U.S. Department of Justice Title VI Legal Manual, January 11, 2001 edition Executive Order 13166 Title VI of the Civil Rights Act of 1964 Welcome Tucson Immigrants Bienvenido a Tucson ADA Public Notice  Equal Employment Opportunity Plan Summary FY 2015-2016PDF City of Tucson Disparity Study Report </p> <p>City of Phoenix Equal Opportunity Department ADA U.S. Department of Labor Arizona Center for Disability Law Sun Van - ADA Office Sun Tran - ADA Office Transit Division - ADA Office Tucson Commission on Disability Issues (CODI) Citizen Police Advisory Review Board (CPARB) Web Site Equal Employment Opportunity Plan (EEOP) Utilization Report for Tucson Police </p>
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TITLE VI NON-DISCRIMINATION PLAN

APPENDIX P – CITY OF TUCSON ADMINISTRATIVE DIRECTIVES

<https://www.tucsonaz.gov/hr/administrative-directives>



Human Resources

[Online Employment System](#)

[Employment FAQ](#)

[Civil Service Rules \(pdf\)](#)

[Benefits Snapshot](#)

[City Employee & Retiree](#)

[Insurance Benefits](#)

[Retirement Benefits](#)

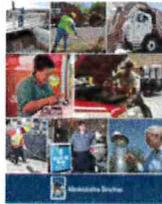
[Classification, Compensation, & Salary](#)

[Equal Opportunity Programs](#)

[Staff Directory](#)

Administrative Directives

All ADs have been collated into one document to make it easier to search the entire set. Click on the AD Book below.



Equal Opportunity Programs

2.05-2	Reasonable Accommodation of Applicants and Employees with Disabilities	02/01/2016
2.05-8	Discrimination/Harassment Policy	02/08/2012
2.05-9	Services for Language Access Policy for Limited English Proficiency (LEP)	07/14/2008
2.05-10	Americans with Disabilities Act (ADA) Compliance with Title II - Public Services	10/24/2014
2.05-11	Employee Mediation Program	02/03/2014

TITLE VI NON-DISCRIMINATION PLAN

APPENDIX Q – CITY OF TUCSON DBE STATEMENT



CITY OF
TUCSON

OFFICE OF EQUAL OPPORTUNITY PROGRAMS
AND INDEPENDENT POLICE REVIEW

CITY OF TUCSON POLICY STATEMENT

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

The City of Tucson has received federal financial assistance from the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) of the U.S. Department of Transportation (DOT) and has established a Disadvantaged Business Enterprise (DBE) Diversity Program for contracts in accordance with regulations of the U.S. DOT, 49 CFR 26. The Program applies to all City and subrecipient contracts that are funded, in whole or in part, by U.S. DOT federal financial assistance.

It is the policy of the City of Tucson to ensure that DBEs, as defined in 49 CFR 26, have an equal opportunity to receive and participate in DOT-assisted contracts. To achieve this the City will strive:

1. To ensure nondiscrimination in the award and administration of DOT-assisted contracts on the basis of race, color, sex, or national origin;
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; and
6. To assist the development of firms that can compete successfully in the market place outside the DBE Program.

100 N. STONE AVE., SUITE 610 • P.O. BOX 27210 • TUCSON, AZ 85726-7210
(520) 791-4593 • FAX (520) 791-5140 • TTY (520) 791-2639
www.cityoftucson.org

