



External Civil Rights

2025 AzTA/ADOT Annual Transit Conference
Title VI and ADA Compliance for
ADOT FTA Subrecipients

ADOT External Civil Rights – 1801 W. Jefferson St.,
Phoenix, AZ 85007 – (602) 712-8946

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Learning Objectives

- ADA Information
- Title VI Requirements and Guidelines
- Access to services



What is your favorite activity to do during spring?

Hiking
Bird Watching
Gardening
Camping
Baseball / Spring

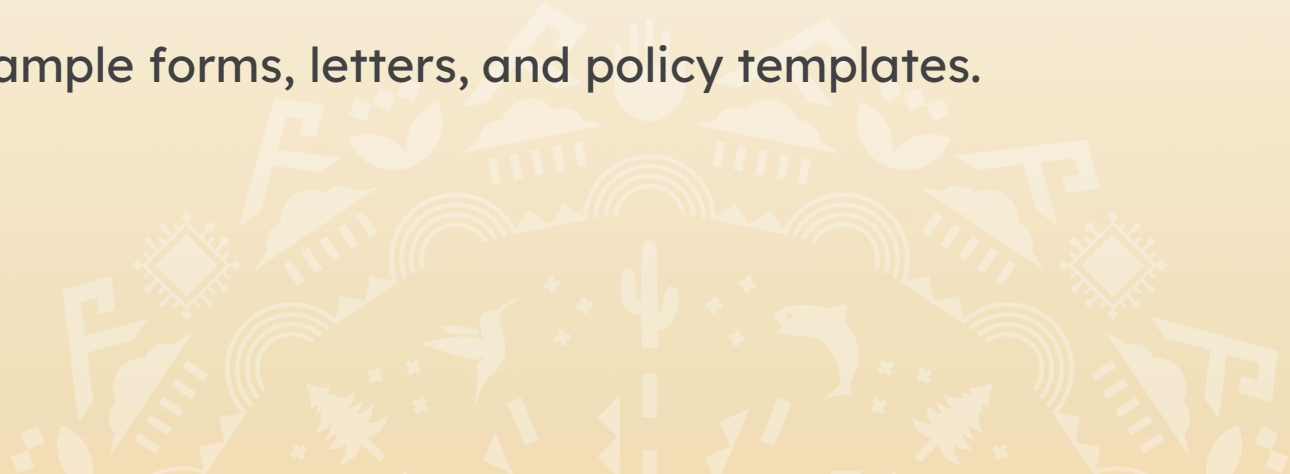
**CAMPING
IN
ARIZONA**



FTA / ADOT Coordination

To provide guidance to recipients and subrecipients of Federal Transit Administration (FTA) financial assistance to carry out activities implementing ADA and Title VI regulations.

Provide sample forms, letters, and policy templates.



Americans with Disabilities Act of 1990

Prohibits discrimination and ensures equal opportunity and access for persons with disabilities.

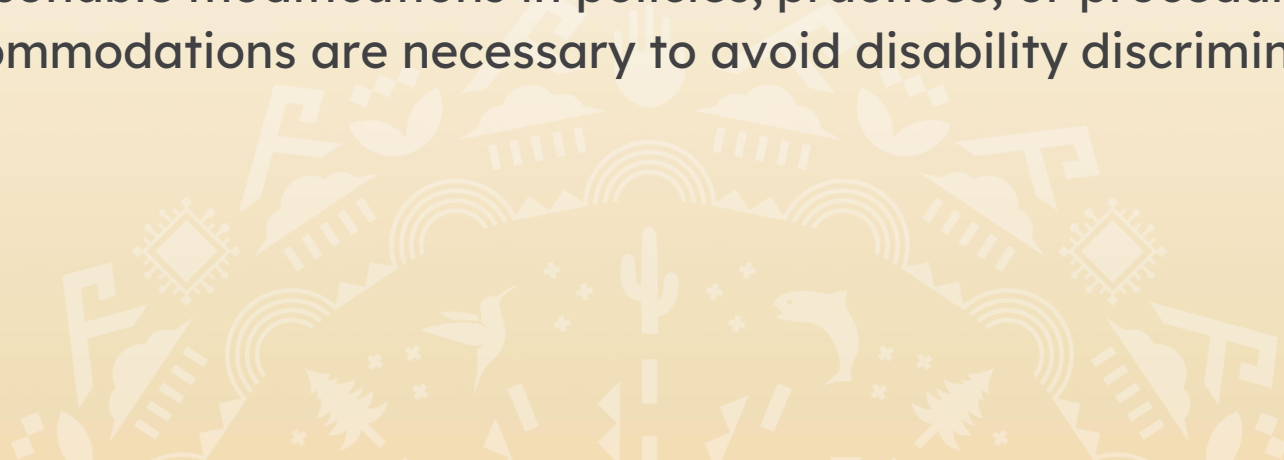
The ADA applies to almost all providers of transportation service, whether private or public, and whether or not an agency receives Federal financial assistance.



ADOT FTA Transit Agencies

Ensure nondiscrimination in connection with the provisions of transportation services.

Make reasonable modifications in policies, practices, or procedures when such accommodations are necessary to avoid disability discrimination.



Service Denial

Service denial for rider conduct that is:

- Violent
- Seriously disruptive
- Illegal or a direct threat to others

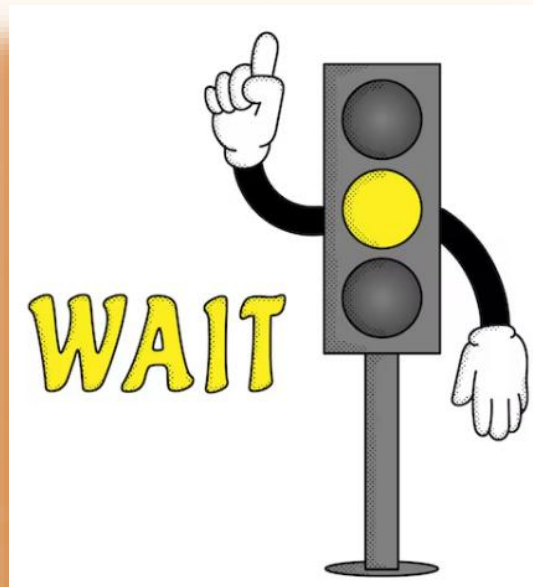
Any situation that disrupts the provision of service should be based on reasonable judgment



Service Denial

Steps to take before refusing service:

- Resolve issues with riders or representative
- Document incidents leading to denial
- Written warnings when possible



Equipment

Equipment for accessible service include but not limited to:

- Lifts and ramps
- Securement devices where required
- Signage and systems to facilitate communications



Wheelchairs

Should accommodate rider using wheelchairs:

- If the device meets the definition
- Fits on the lift or ramp and securement area
- If the wheelchair and occupant combined weight do not exceed the lift specs
 - Standees are permitted on lifts



Mobility Devices

- Persons with mobility disabilities may use devices other than wheelchairs
 - Canes
 - Crutches
 - Walkers



Service Animals

Are individually trained to work or perform tasks for an individual with a disability, including but not limited to:

- Guiding individuals with impaired vision
- Alerting individuals with impaired hearing
- Pulling a wheelchair
- Fetching dropped items

Service Animals

Accommodate riders with service animals unless the service animal:

- Has not been individually trained to perform a specific work or task
- Poses a direct threat to the health or safety of drivers or riders
- Creates a seriously disruptive atmosphere
- Not under the rider's control



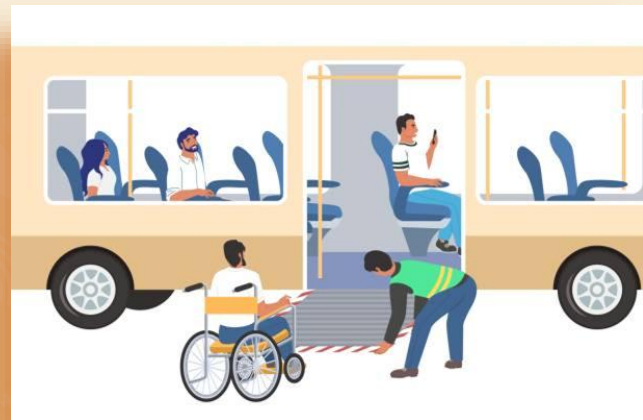
Providing Accessible Information

- Providing written information in accessible formats
 - large print, braille, electronic files usable with text-to-speech
- Ensuring published materials/websites are accessible
 - by people with physical, sensory, or cognitive disabilities
- Ensuring alternatives to audio communications are available
 - for individuals who are deaf, hard of hearing, or have speech impairments

Personnel Training

Ensure that personnel are trained to operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous manner.

Ensure that the accessibility related equipment and that ADA accommodations actually result in the delivery of good transportation services to individuals with disabilities.



Reasonable Modification

Making reasonable modifications in policies, practices, or procedure to avoid disability discrimination when:

- Modifications are necessary
- Accessibility to the service is necessary

Make information about the process for requesting reasonable modifications available to the public.

Reasonable Modifications

Reasonable modifications may be denied if granting would:

- Fundamentally alter the nature of the service, program, or activity
- Create a direct threat to the health and safety of others
- Not be necessary to allow the passenger to fully use the service

If denied, an agency should take to the maximum extent possible, any other actions to ensure that the individual with a disability receives the services provided by the agency.

Written Policies and Procedures

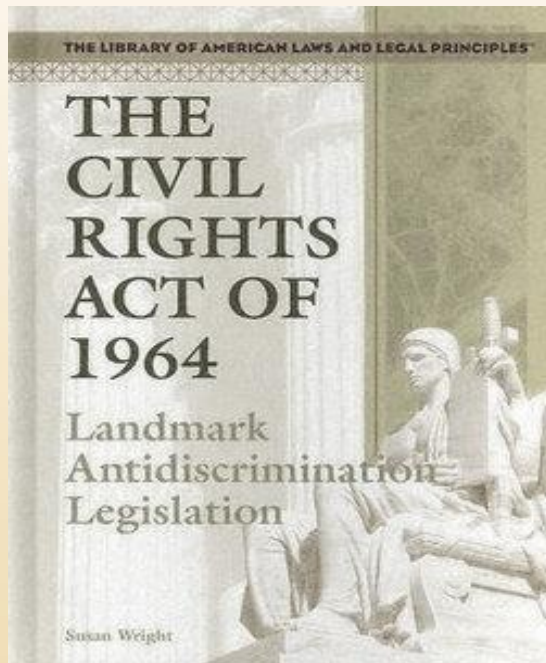
Implement and update policies and procedures to ensure consistency in operations as part of the general nondiscrimination requirements and help avoid unintentional discrimination.



Title VI of the Civil Rights Act of 1964



Title VI of the Civil Rights Act of 1964



What is Title VI?

“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 Ensures individuals are not:

- Denied a service, benefit on the grounds of race, color, or national origin
- Provided a service or benefit that is different from that provided to others
- Restricted in the enjoyment of any advantage or privilege enjoyed by others

Limited English Proficiency

Ensures Limited English Proficiency (LEP) Persons:

“Meaningful access to services and programs” that may normally only be provided in English



ARIZONA

Spanish

Navajo

Chinese

Tagalog

Arabic

Vietnamese

Hindi

French

German

Indo-European

Title VI Nondiscrimination Plan Template

Title VI Plan Cover Page

TYPE AGENCY/TRANSIT PROVIDER
NAME HERE
YEAR

Title VI Contact: TYPE TITLE VI CONTACT PERSON AND TITLE HERE
Title VI Contact Phone: TYPE TITLE VI CONTACT PERSON PHONE NUMBER HERE
Title VI Contact Email: TYPE TITLE VI CONTACT PERSON'S EMAIL HERE
TTY Number (if applicable): TYPE YOUR TTY NUMBER HERE
Alternate Language Phone: TYPE ALTERNATE LANGUAGE PHONE NUMBER HERE
Address: TYPE YOUR ADDRESS HERE
Web Address: TYPE WEB ADDRESS HERE
Para Información en Español: TYPE NAME AND CONTACT INFORMATION HERE

Title VI Plan Guidance:

The following information is provided for guidance purposes only. For further guidance see Federal Transit Administration Circular 4702.1B.

If your agency chooses to utilize this document, please ensure that all sections are specifically updated to reflect your agency's policies and procedures.

Additionally, agencies must certify that the policies and procedures listed in this plan will be implemented. Audits or inspections by the **ADOT Civil Rights Office (CRO)** will be conducted based on your agency's compliance with the submitted Title VI Plan.

Complaints, Investigations, and Lawsuits, should not be a part of your Title VI Implementation Plan and should be submitted separate to the ADOT CRO at the time of your annual submittal of your Title VI Implementation Plan. Every section should start on a new page to auto update the Table of Contents.

***Please delete this Title VI Plan Guidance Page at the time of submittal. Please address all boxes highlighted in gray, and don't add spaces after the information is typed in. Make sure to hit tab or click on the next box to proceed. Remove the gray highlight at time of submittal. Please also delete all instructional language that is underlined, italicized, and colored blue for the final plan.**

This Checklist has been created to assist you with the submittal of your Title VI Plan.

Before submitting the Title VI Plan, ensure the plan has the following:

- ☐ Cover Page
- ☐ Table of Contents (*Update this by clicking on the contents box, and select the update table option. Please ensure every section begins in its own page to ensure the table reflects the correct pages.*)
- ☐ Executive Summary
- ☐ Non Discrimination Notices to the Public in English and Spanish
- ☐ Discrimination ADA/Title VI Complaint Procedures
- ☐ Discrimination ADA/Title VI Complaint Form
- ☐ Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits
- ☐ Public Participation Plan
- ☐ Limited English Proficiency Plan
- ☐ Non-elected Committees Membership Table
- ☐ Monitoring for Subrecipient Title VI Compliance
- ☐ Title VI Equity Analysis
- ☐ Fixed Route Transit Provider Analysis

Board Approval should be obtained after Conditional CRO approval:

- ☐ Board Approval for the Title VI Plan

Website Guidance – The following three documents must be posted on your agency's webpage after they have been approved.

- ☐ Non Discrimination Notice to the Public (for each language that meets the Safe Harbor Provision)
- ☐ Discrimination Complaint Form
- ☐ Discrimination Complaint Procedures (may use one web link for both the Non Discrimination Complaint Form and Non Discrimination Complaint Procedures)

Title VI Plan Requirements

1. An executive summary
2. A record of any public transit-related Title VI/ADA investigations, complaints, or lawsuits filed with the subrecipient
3. Public Participation Plan
4. Limited English Proficiency (LEP) Plan
5. Non-Elected Committee Membership Table
6. Monitoring of Subrecipient
7. Title VI Equity Analysis
8. Fixed Route Analysis
9. Board Approval
10. Nondiscrimination Notice to the Public
11. Nondiscrimination Complaint Procedures
12. Discrimination Complaint Form

Nondiscrimination Notice to the Public Posters:

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA TYPE AGENCY/TRANSIT PROVIDER NAME HERE

TYPE AGENCY/TRANSIT PROVIDER NAME HERE operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the TYPE AGENCY/TRANSIT PROVIDER NAME HERE.

For more information on the TYPE AGENCY/TRANSIT PROVIDER NAME HERE's civil rights program, and the procedures to file a complaint, contact TYPE TITLE VI CONTACT PERSON AND TITLE HERE, TITLE VI CONTACT PERSON PHONE NUMBER HERE, (TTY TYPE YOUR TTY NUMBER HERE); email TYPE TITLE VI CONTACT PERSON'S EMAIL HERE; or visit our administrative office at TYPE YOUR ADDRESS HERE. For more information, visit TYPE WEB ADDRESS HERE.

Complaints may be filed directly with the Arizona Department of Transportation (ADOT) Civil Rights Office. ATTN: Title VI Program Coordinator 206 S. 17th Ave MD 155A RM: 183 Phoenix AZ, 85007 or with the Federal Transit Administration (FTA). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact TYPE ALTERNATE LANGUAGE PHONE NUMBER HERE. *Para información en Español llame: TYPE NAME AND CONTACT INFORMATION HERE

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA TYPE AGENCY/TRANSIT PROVIDER NAME HERE

TYPE AGENCY/TRANSIT PROVIDER NAME HERE (y sus subcontratistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de TYPE AGENCY/TRANSIT PROVIDER NAME HERE, y los procedimientos para presentar una queja, contacte TYPE TITLE VI CONTACT PERSON AND TITLE HERE, TITLE VI CONTACT PERSON PHONE NUMBER HERE, (TTY TYPE YOUR TTY NUMBER HERE); o visite nuestra oficina administrativa en TYPE YOUR ADDRESS HERE. Para obtener más información, visite TYPE WEB ADDRESS HERE

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (ADOT). Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte (FTA). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

Nondiscrimination Notice to the Public Posters:

- Describe ADA/Title VI Nondiscrimination Policy
- Notify the public of your agency's compliance with ADA/Title VI
- Provide contact information for your agency as well as the ADOT's External Civil Rights Program
- The Nondiscrimination and Auxiliary Aid posters should be posted in areas visual to the public

ADA/Title VI Complaints

FTA Subrecipient Responsibilities include:

- Designated employee, as the point of contact
- Accessible format of complaint procedures accessible to and usable by individuals with disabilities or Limited English Proficiency (LEP)
- Advertise how to file a complaint
- Promptly communicate your responses to the complainant

See FTA ADA Circular 4710.1 Section 12.7
See FTA Title VI Circular 4702.1B

ADA/Title VI Discrimination Complaint Process

- Filed within 180 days and signed
- Contain full contact information
- Include basis of the complaint
- Describe alleged act
- Other relevant information

9. COMPLAINT PROCEDURES

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, as amended, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987 and the Americans with Disabilities Act of 1990 as they relate to any program or activity administered by ADOT, its subrecipients, consultants and contractors. Intimidation or retaliation as a result of a complaint is prohibited by law.

In addition to these procedures, complainants reserve the right to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints informally at ADOT and the subrecipient level.

Procedures

1. Any person, specific class of persons or entity that believes they have been subjected to discrimination as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, disability, income status or retaliation may file a formal complaint with ADOT's Civil Rights Office. A copy of the Complaint Form may be accessed electronically at:
<http://www.azdot.gov/business/civil-rights/title-vi-nondiscrimination-program/filing-a-complaint>
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. The complaint must be written and signed by the complainant and shall include:
 - The Complainant(s) name, address and phone number
 - A detailed description of the alleged incident that led the complainant to believe discrimination occurred
 - The date of the alleged act of discrimination, the date when the complainant(s) became aware of the alleged discrimination, the last date of the conduct or the date or the date the conduct was discontinued
 - The names and job titles of those parties involved in the complaint
 - The facts and circumstances surrounding the alleged discrimination and the basis of the complaint (i.e., race, color, national origin, disability, or retaliation)
 - Names and contact information of persons whom the investigator can contact for additional information to support or clarify the allegations
 - The corrective action being sought by the complainant

Discrimination Complaint Form

Discrimination ADA/Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print <input type="checkbox"/> TDD	<input type="checkbox"/> Audio Tape <input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
<input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court: _____ ☐ State Agency: _____

☐ State Court: _____ ☐ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are **required** below:

Signature Date

Please submit this form in person at the address below, or mail this form to:

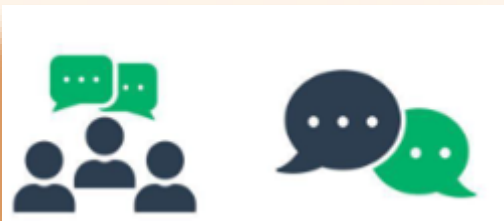
TYPE AGENCY/TRANSIT PROVIDER NAME HERE
TYPE TITLE VI CONTACT PERSON AND TITLE HERE
TYPE YOUR ADDRESS HERE
TITLE VI CONTACT PERSON PHONE NUMBER HERE
TYPE TITLE VI CONTACT PERSON'S EMAIL HERE

A copy of this form can be found online at **TYPE WEB ADDRESS HERE**

If information is needed in another language, contact **TYPE ALTERNATE LANGUAGE PHONE NUMBER HERE**. *Para información en Español.
 Source: TYPE NAME AND CONTACT INFORMATION HERE

Public Outreach

- Social media
- Email subscriptions
- Newsletters
- Local events
- Partnering with community groups



Limited English Proficiency Plan

Vital Documents

After completing the Four Factor Analysis, a recipient may determine that an effective LEP plan includes translation of vital documents.

Vital documents include, but are not limited to:

- Consent and complaint forms
- Written notices of rights
- Decreases in benefits or services
- Notices advising LEP individuals of free language assistance services
- Other documents that provide access to essential services your agency provides

Limited English Proficiency Plan

The Four Factor Analysis:

1. Number or proportion of LEP individuals eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. Frequency with which LEP individuals come in contact with the program.
3. Nature and importance of the program, activity, or service provided to LEP individuals' lives.
4. Resources available to the recipient and cost analysis of these resources.

How do I ensure an LEP individual has access?

- Translated materials
- I-Speak cards
- Volunteer Bilingual staff
- Vendors for interpretation/translation services
- Online translating resources



2004 Census Test	United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD	
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Ինչպե՞ս ենք 'նշում' կատարե՞լ այս ցանկաբանում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> លុយបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសាខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kakhon ya yangin üntüngnu' manaitai pat üntüngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech

Preliminary Review: Deficiency Trends

- Title VI plans were outdated
- Public Participation Plans did not contain outreach efforts or included outdated activities
- Limited English Proficiency Plan contained outdated Census information
- Board Approvals were sent to the agency's board committee before ADOT provided the official approval



Public Participation Plan

- Public Participation plans did not list efforts made to interact with the public with the previous year. It also did not include upcoming plans to reach out to the public.
- Examples can be provided in the form of Brochures, Public meeting or hearing invitations.
- Sample documents should be provided in this section.

Features of meaningful public involvement



U.S. Department of Transportation

Promising Practices for Meaningful Public Involvement
in Transportation Decision-Making

Limited English Proficiency Plan

- Title VI Plan did not include a current 4 factor analysis.
- Title VI Plan did not include an updated demographic chart with the most current Census data.

Primary LEP Languages by Number and Percentage of LEP Population		
Language	Total Number	% of LEP Population
Spanish	41,715	63.6%
Chinese	4,806	7.3%
Other Asian Languages	3,455	5.3%
Arabic	1,878	2.9%

Contact Us

ADOT External Civil Rights

1801 W. Jefferson St., MD154A Ste.101

Phoenix, AZ 85007

ECR main line: 602.712.8946

CivilRightsOffice@azdot.gov



Keely D'Amour-Toy

Torigoe



Kevin



Scan to give us your feedback

