

# SouthEastern Arizona Governments Organization



## Title VI Goals and Accomplishments Report

Relating to Transportation Planning and Improvements

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Prepared by:  
SEAGO  
1403 W. Highway 92  
Bisbee, Arizona 85603

**Contact:**

Randy Heiss, Executive Director  
Phone: (520) 432-5301 Extension 202  
Fax: (520) 432-5858  
E-mail: [rheiss@seago.org](mailto:rheiss@seago.org)  
[www.seago.org](http://www.seago.org)

## I. OVERVIEW

### **SEAGO**

The SouthEastern Arizona Governments Organization (SEAGO) is a regional planning agency which performs and coordinates a variety of functions. Established in 1972, SEAGO is a 501(c) 3, nonprofit organization whose mission is to assist local governments in seeking cooperative solutions to area wide problems; to provide a forum for regional policy development and serve as a coordinating link between municipal, county, tribal, state, and federal agencies. SEAGO is one of six Arizona Councils of Governments (COGs).

SEAGO serves the four counties of Cochise, Graham, Greenlee, and Santa Cruz. SEAGO's programs focus on issues that often cross jurisdictional boundaries. Originally a planning entity, SEAGO's operational scope has expanded considerably since its inception to include planning as well as project programming and implementation activities in the areas of housing, economic development, social services, transportation, the environment, and public transit.

The SEAGO Transportation Program assists member entities and other organizations with programs administered through the Arizona Department of Transportation (ADOT). Each community within the region is eligible for funding for transportation infrastructure or public transit projects from various programs, which is often done through competitive application processes. SEAGO's Transportation Program conducts the processes through which ADOT administered funding sources are accessed and provides technical support, data, and other information to communities or organizations within the SEAGO region when applying for ADOT or transportation related grants.

### **SEAGO/ADOT Relationship**

State transportation agencies such as ADOT are the principal recipients of Federal-aid Highway Funds for transportation planning and infrastructure improvements. ADOT has the authority to delegate project administration and management to subrecipients and Local Public Agencies (LPAs) including "any city, county, township, municipality, or other political subdivision that may be empowered to cooperate with the State transportation department in highway matters" (23 CFR 635.102).

As described above, SEAGO receives planning funding from ADOT to perform a defined annual scope of work that consists of assisting ADOT in carrying out certain transportation related planning activities within the four-county SEAGO region. Because SEAGO is a subrecipient of federal funding through ADOT, SEAGO is considered an LPA. As an LPA, SEAGO is required to carry out its transportation planning duties and obligations in accordance with all applicable federal requirements.

One such requirement is Title VI of the Civil Rights Act of 1964, which requires outreach to underserved groups. Among other requirements, Title VI specifically mandates that "No person in the United States shall on the grounds of race, color, or national origin be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance." (42 USC 2000d)

Unlike LPAs implementing transportation infrastructure or public transit projects, these planning activities have a limited impact on the underserved populations protected under Title VI. For example, an LPA who is providing public transit services might adversely impact underserved populations when making decisions such as which routes to cut in response to reductions in funding and the need to improve efficiencies, whereas SEAGO's administration of the application and ranking process through which public transit providers are awarded ADOT funding would have a much narrower exposure to adversely impacting underserved populations.

Although adverse impacts on underserved populations from SEAGO's planning activities will be limited in most cases, this does not relieve the agency from its obligation to comply with Title VI requirements. To that end, SEAGO has developed a Title VI Implementation and Public Participation Plan, which sets forth how SEAGO will ensure underserved populations are provided meaningful opportunities to become involved in the transportation planning process within the SEAGO region. This Title VI Report and Update describes the progress SEAGO has made in implementing the Title IV Implementation and Public Participation Plan.

## II. SUMMARY OF PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

### **Targeted Public Involvement Activities**

Underserved populations are less likely to become involved in the transportation planning process unless a special effort is made to reach out to them. These populations include, but are not limited to:

- Minority (Hispanic and/or non-white) community members.
- Low-Income community members.
- Physically and mentally challenged community members.
- People who may rely on alternative transportation.
- People with limited English proficiency.
- Aging individuals.

By making a reasonable effort to include these populations, SEAGO ensures that the opportunity exists for the interests and input of all residents to be given equal consideration.

SEAGO's Title VI Implementation and Public Participation Plan includes a Public Participation Toolbox which is a comprehensive listing of various public outreach activities that may be utilized to enhance public participation. There are numerous and varied techniques/activities to provide the opportunity for public involvement. Any combination and number of these may be used depending on the scope of the specific plan, program, or project. As funding permits, SEAGO selects from the various activities to provide the most effective public participation in each particular situation.

Due to the current limitations of planning resources, SEAGO has chosen to focus on public outreach activities required by law and those most likely to reach underserved populations, while preserving resources that may be needed to provide special accommodations to include these individuals during the planning process, such as translation of materials for Limited English Proficiency (LEP) individuals, or those who are hearing and visually impaired.

Therefore, during the preceding year, public outreach and involvement consisted of the following activities selected from the Toolbox:

- E-mail – This has been used extensively to communicate notices of meetings or public hearings to SEAGO’s membership, the general public and underserved populations (more specifics below).
- Contact Lists – SEAGO has developed a Title VI contact distribution list which consists of individuals and agencies that serve the underserved populations protected under Title VI. Notices of all SEAGO meetings, including the SEAGO Executive Board, the Administrative Council, the Technical Advisory Committee (TAC), and any committees or subcommittees thereof, are distributed via e-mail to the Title VI Contact list so that they are provided the opportunity to participate in and/or comment on SEAGO planning activities. The e-mail notice asks the providers serving underserved populations to inform those individuals they serve of the opportunity to participate, the date, time, and location of the event.
- Internal Communications – In addition to transportation planning, SEAGO functions as the four-county Area Agency on Aging, which provides a wide range of services to the aging individuals in the region. This connection provides a unique opportunity to involve this underserved sector in SEAGO planning activities.
- Meetings – Underserved populations are invited to participate in all SEAGO meetings (see Contact List [above] and Public Notice [below] for details). To facilitate participation, a call-in number is provided for individuals who are unable to attend the meetings in person.
- Newsletter – SEAGO currently produces a newsletter that is distributed to a broad range of stakeholders and service providers, many of which serve underserved populations protected under Title VI.
- Press Releases – Press releases are used when a study or plan is available for public comment, and to notify the general public of the opportunity to comment, and when activities such as public hearings will be held.
- Public Meetings/Hearings – The Title VI Contact distribution list is used to inform underserved populations of any public meetings or hearings.
- Public Notices – These are a requirement for all SEAGO meetings, which are conducted in compliance with the Arizona Open Meeting Law. As discussed above, public notices are also distributed to the Title VI Contact distribution list. Public notices include reasonable accommodations for individuals with disabilities, or with special needs, e.g. sign language interpreters. SEAGO includes a the name of the SEAGO Title VI Coordinator as the point of contact person, telephone number, e-mail address, and the deadline for response from those with special needs. SEAGO typically distributes notices of meetings at least a week in advance of any meetings. Notices for public hearings are distributed at least 45 days in advance of the date of the hearing.
- Website Notices – All notices of SEAGO meetings, public hearings or public comment periods are posted to the SEAGO website.

SEAGO understands the need to keep the public aware of our transit planning activities. In addition to posting meeting agendas on our website and offices, meeting notices and agendas are distributed via email to agencies that provide direct services to Title VI protected populations. We request that they make their clients aware of these opportunities for public involvement by posting the meeting

notice at their office locations, websites, or social media pages. The following is our current email list of agencies that assist us in distributing our notices and opportunities for public involvement:

Agency Name	Service Area
Arizona State Schools for the Deaf and the Blind (ASDB)	State of Arizona
Arizona Department of Economic Security (DES)	State of Arizona
Catholic Community Services (CCS)	Southeast Arizona
City of Benson - Benson Area Transit (BAT)	Benson and St David
City of Bisbee - Bisbee Bus	Bisbee and Naco
City of Douglas - Douglas Rides	Douglas, Elfrida, and Pirtleville
City of Nogales - Nogales Rides	Nogales
City of Sierra Vista - Vista Transit	Sierra Vista
Cochise County Health and Social Services	Cochise County
Community Provider of Enrichment Services, Inc. (CPES)	Southeast Arizona
Douglas ARC (DARC)	Douglas and Elfrida
Easter Seals Blake Foundation	Southeast Arizona
Graham County Rehabilitation Center (GCRC)	Graham County
Horizon Human Services	Southeast Arizona
Northern Arizona Community Hospital (NCCH)	Willcox, Pearce, Bowie, and San Simon
Premier Alliances	Bisbee and Sierra Vista
Santa Cruz Training Program	Santa Cruz County
Southeastern Arizona Community Action Program (SEACAP)	Southeast Arizona
SouthEastern Arizona Behavioral Health Services (SEABHS)	Southeast Arizona
Southeastern Arizona Consumer Run Services (SEACRS)	Southeast Arizona
Volunteer Interfaith Caregiver Program (ViCAP)	Sierra Vista, Benson, Hereford
Wellness Connections	Cochise and Graham Counties

The following is a list of the meetings and other activities that were open to the public or open for public comment during the last year:

- 45-day public comment period on the DRAFT regional Transportation Improvement Plan (TIP). The purpose of this activity was to solicit public comment on the DRAFT TIP.
- One (1) Public Transit Project Prioritization Workshop, the purpose of this event is to prioritize Regional FTA Section 5310 transit projects applying for Coordinated Mobility Grants in FY17.
- Four (4) Advisory Council on Aging (ACOA) meetings, held quarterly at various locations throughout the region. The purpose of these meetings is to make recommendations to the Administrative Council and Executive Board relating to programs administered by the SEAGO AAA, including public transportation funding for senior citizens in the SEAGO region.
- Six (6) Transit Coordination meetings, held quarterly in Cochise and Graham Counties. The purpose of these meetings is to enhance coordination, leverage resources and increase efficiencies among the public transit providers, and to provide information and technical assistance to the providers who need it.
- Six (6) Technical Advisory Committee (TAC) meetings, held bi-monthly in Benson, Arizona. The purpose of these meetings is to include local governments in the regional transportation planning process. These communities compete for local project funding from the federal Surface Transportation Program, the Highway Safety Improvement Program, the Transportation Enhancement Program, and other federal aid highway programs. The TAC ranks funding applications, approves TIP amendments, recommends transportation planning policies and procedures, and discusses successes and challenges at these meetings. All recommendations from the TAC are forwarded to the Administrative Council and Executive Board for final consideration.
- Four (4) Administrative Council meetings, held in February, May, August and November in Benson, Arizona. The purpose of these meetings is to conduct SEAGO business, including recommending to the Executive Board the approval of funding applications, TIP approvals and other business relating to SEAGO programs.
- Four (4) Executive Board meetings, held in February, May, August and November at various locations throughout the region. The purpose of these meetings is to conduct SEAGO business, including the approval of funding applications, TIP approvals and other business relating to SEAGO programs.
- Four (4) combined Administrative Committee and Executive Committee meetings held telephonically. These committees are comprised of the officers of the Administrative Council and Executive Board. The purpose of these meetings is to conduct business in between regularly scheduled meetings of the Administrative Council and Executive Board, including recommending to the Executive Board the approval of funding applications, TIP approvals and other business relating to SEAGO programs.
- Two (2) Strategic Highway Safety Plan Public Meetings. These public meetings were held in July in Cochise County and October in Graham County. The purpose of these workshops was to allow the community to provide information about traffic safety concerns in their community.
- One (1) SEAGO Strategic Planning Workshop. In February SEAGO conducted two work sessions to update our organizational Strategic Plan. The general public was notified and invited to participate in the update and the development of our Strategic Safety Plan.
- Eight (8) Intercity Bus Public Meetings. These public meetings were held in October in Bisbee, Benson, Douglas, and Sierra Vista and again in March in Bisbee, Benson, Douglas,

and Sierra Vista. The purpose of these workshops was to allow the community to provide information and concerns about a potential intercity bus service that would connect the communities of Bisbee, Benson, Douglas, and Sierra Vista.

- Five (5) Willcox Healthy Community Meetings. SEAGO partnered with the Cochise County Health Department and the University of Arizona to host community meetings involving seeking solutions to transit issues in the Willcox area.

### **General Public Involvement Activities**

In addition to the above, meetings and hearings are scheduled to provide the best opportunity for attendance by the general public and the underserved populations protected under Title VI whenever possible. The meeting locations are convenient and ADA accessible. In addition to general meetings, events and activities, reasonable efforts are made to reach those who are particularly affected, the underserved, or others who request SEAGO come to them. These options are open to any group or individual and it is the policy of SEAGO to go where people are whenever possible. Locations and meeting times for these activities are designed according to the specific needs.

In order to help citizens better understand Transportation Planning, efforts are made to show how presented information specifically relates to the public in both the near future as well as long-term. Visualization enhancements such as color, animation, physical props, pictures, 3-D models, etc. are incorporated as appropriate and as budgets allow. Technical and policy information from SEAGO is written so that it is clear and understandable to the public. All relevant information is open for public consideration. Staff are made available to answer questions at meetings and respond to phone questions in a timely manner.

Opportunities for input vary depending on the project, program, or plan. For larger projects, such as a regional transportation plan, several rounds of public participation may be appropriate. A complete record of public comments is retained for public review. In specific cases, identified by federal regulations, public comments may be a part of the final document.

All transportation planning decisions are made by one or more groups of elected or appointed officials. The Technical Advisory Committee (appointed officials for transportation infrastructure) or the Review Panel (appointed officials for public transit projects) make recommendations for project funding which are then passed on to the Administrative Council (appointed officials), whose recommendation is finally voted on by the Executive Board (elected officials). Through this process, there are multiple public meetings which allow comments to be collected. Prior to each key decision point, ample opportunity is offered for input and that input is shared with the decision-makers. The final decision, however, is the responsibility of the elected officials, which is based on recommendations of the appointed officials and consideration of all related information.

### **Specialized Public Involvement Activities**

In FY 17, in an effort to support our regional planning efforts, *SEAGO conducted three (3) data collection surveys. The surveys conducted were:*

- **Strategic Highway Safety Plan (Road Safety Survey):** The survey was provided in paper form and online. The survey was provided in both English and Spanish. Outreach activities included a newspaper article placed in all of our local newspapers, speaking at Rotary Club, Kiwanis, City Council, Chamber of Commerce, Hispanic Chamber of Commerce, and other regional health and human services events. SEAGO also spoke with our Transit Coordination Group (28 members), SEAGO Administrative Council (19 members), SEAGO Executive Board (19 members), and our SEAGO Transportation Advisory Committee (20 members) to promote the survey. SEAGO distributed the survey via email to our list of agencies that provide direct services to Title VI protected populations. SEAGO posted the survey on our website and a majority of our member organizations posted the link to the survey on their agency websites. SEAGO received 463 responses to our survey.
- **Intercity Route Study (Transit Needs Survey):** The survey was provided in paper form and online. The survey was provided in both English and Spanish. A website was created in both English and Spanish to promote the project and survey. SEAGO hired a temporary bilingual employee to distribute and collect the survey in high traffic areas such as stores, DES/Social Security offices, medical centers, and local colleges. Outreach activities included a newspaper article placed in all of our local newspapers, speaking at City Council, Chamber of Commerce, Hispanic Chamber of Commerce, and other regional health and human services events. SEAGO participated in local health fairs to promote the survey. SEAGO participated in Cochise County Community Health events to promote the survey. SEAGO also spoke with our Transit Coordination Group (28 members), SEAGO Administrative Council (19 members), SEAGO Executive Board (19 members), and our SEAGO Transportation Advisory Committee (20 members) to promote the survey. SEAGO distributed the survey via email to our list of agencies that provide direct services to Title VI protected populations. SEAGO posted the survey on our website and a majority of our Cochise County member organizations posted the link to the survey on their agency websites. SEAGO received 810 responses to our survey.
- **Willcox Transit Needs Survey:** The survey was provided in paper form and online. The survey was provided in both English and Spanish. Outreach activities included a newspaper article placed in the Willcox newspaper, speaking at school events, Willcox City Council, Willcox Chamber of Commerce, and had a booth at the Willcox Health Fair to promote the survey. SEAGO utilized our Willcox Healthy Community Group (12 members) to distribute the survey to their programs. SEAGO distributed the survey via email to our list of agencies that provide direct services to Title VI protected populations in the Willcox area. SEAGO posted the survey on our website and a majority of our member organizations posted the link to the survey on their agency websites. SEAGO received 161 responses to our survey.

### III. TITLE VI TRAINING/TECHNICAL ASSISTANCE

#### **Training**

The SEAGO Transportation Planner attended the Public Involvement for Decision Makers Workshop at the Rural Transportation Summit on January 19, 2017.

On February 8, 2017, SEAGO staff participated in the ADOT DBE Program Training and Implementation for AZ COG/MPO Planners webinar.



On April 10, 2017, SEAGO's Title VI Coordinator and Assistant Regional Mobility Manager attended the ADOT Title VI and ADA Compliance Workshop at the AzTA Conference in Phoenix.

SEAGO's Transportation Planner, Regional Mobility Manager, and Assistant Regional mobility Manager participated in ADOT's March 28, 2017, and April 4, 2017 Coordinated Mobility Grant Webinars. Each webinar had a component specific to Title VI.

***SEAGO has addressed Title VI in our staff meetings. Information is provided by our Transportation Planner and has been provided to 8 people. Content includes the online location of the SEAGO Title VI Plan, the protected classes, the Title VI Coordinator contact information, our complaint procedures, and the online location of our Title VI Complaint Form.***

SEAGO has developed a Grant Compliance Workshop that is delivered to our state's rural FTA Section 5310 and FTA Section 5311 grant recipients. The workshop contains training on Title VI. The goal is to ensure that our providers to ensure they are aware of the purpose of Title VI, the protected classes, and the Title VI complaint process. The Training was attended by 46 people representing 32 FTA Section 5310/5311 agencies.

#### **Technical Assistance**

Title VI is a routine agenda item for our Transit Coordination Meetings. During these meetings, SEAGO discusses current Title VI issues with our 28 agency coordination group. We offer an opportunity to ask questions and to clarify information. ***SEAGO provided technical assistance to 8 FTA Section 5310 and 5311 grant applicants in the development and/or update of their plans.*** SEAGO assisted ADOT in distributing and following up on discrepancies noted in ADOT plan reviews.

#### **IV. LIMITED ENGLISH PROFICIENCY (LEP)**

Demographic information from the April 1, 2010 Census indicates that approximately 43 percent of the region's population are Hispanic or Latino of any race. According to the American Community Survey (5-year selected population tales, Table DP-2), there were 69,569 people in the SEAGO region (or approximately 31% of the region's population) who reported that they spoke Spanish in the home. Of those individuals, only 29,863 (or approximately 12.5% of the region's population) reported that they spoke English less than very well.

This data indicates that while a large number of individuals in the region are Spanish speaking, the percentage of those who may be rated as Limited English Proficiency (LEP) is relatively small. This data also suggests that there are an abundance of Spanish speaking individuals available to assist other Spanish speakers with issues of public interest, such as understanding activities and proposed projects that may impact their quality of life.

SEAGO assists persons with limited English proficiency to actively participate in the transportation planning process. In order to ensure effective communication, SEAGO makes every effort to provide Spanish translators and document translation, where feasible, upon timely request. SEAGO also provides assistance to other LEP populations or individuals who are hearing or visually impaired, upon timely request. These materials and services, i.e. special translations, interpretation or sign language services, large prints, Braille, audio/video cassettes

(as appropriate), will be produced when required. However, due to the time and expense required to develop such materials or services, this will only be done upon request and a minimum of two weeks' notice must be provided to ensure timely arrangements or preparation of such services or materials.

Careful consideration is given to the potential impacts from SEAGO's specific planning activities to the underserved populations. Only when the scope of a proposed project or plan has the potential to significantly impact individuals with language barriers or special needs will pertinent materials or services be prepared in alternative formats without having been specifically requested, i.e. special language translations, interpretation or sign language services, large print, Braille, audio/video, etc. ***In FY 2017, SEAGO received no requests for LEP services.***

## V. PUBLIC PARTICIPATION DATA

***In FY17, SEAGO hosted 44 meetings that were open to the public.*** Our ***Public Meeting Log*** can be found on pages 19 and 20 of this report.

***In FY17, SEAGO hosted 11 Transit Coordination Meetings.*** There has been extensive participation on the part of public transit providers who serve the underserved populations of Cochise, Graham, Greenlee and Santa Cruz Counties. The following table reflects the ethnicity and gender of meeting attendees:

SEAGO TRANSIT COORDINATION MEETINGS		ETHNICITY				GENDER	
Date	Name of Meeting	White	Hispanic	Native American	Other	Male	Female
07/22/16	Willcox Healthy Community Transit Coordination Meeting	8	5	0	0	3	10
10/04/16	Cochise/Santa Cruz Joint Transit Coordination Meeting	8	6	0	1	4	11
10/24/16	Willcox Healthy Community Transit Coordination Meeting	7	2	0	1	4	6
11/08/16	Graham/Greenlee Joint Transit Coordination Meeting	5	1	1	1	2	6
01/12/17	Cochise/Santa Cruz Joint Transit Coordination Meeting	7	11	0	1	5	14
02/14/17	Graham/Greenlee Joint Transit Coordination Meeting	6	1	1	0	3	5
02/23/17	SEAGO Regional Transit Coordination Meeting	12	7	0	1	5	15
02/27/17	Willcox Healthy Community Transit Coordination Meeting	9	3	0	1	4	9
03/13/17	Willcox Healthy Community Transit Coordination Meeting	11	3	0	1	5	10
04/06/17	Cochise/Santa Cruz Joint Transit Coordination Meeting	9	13	1	2	8	17
05/26/17	Willcox Healthy Community Transit Coordination Meeting	6	2	0	1	2	7

***In FY17, SEAGO hosted 10 Public Participation Meetings*** to support regional planning efforts involving an Intercity Feasibility Study and a Regional Strategic Highway Safety Plan. The following table reflects the ethnicity and gender of meeting attendees:

SEAGO PUBLIC MEETINGS		ETHNICITY				GENDER	
Date	Name of Meeting	White	Hispanic	Native American	Other	Male	Female
07/13/16	Strategic Highway Safety Plan Public Meeting – Sierra Vista	6	8	0	2	8	8
10/19/16	Intercity Route Study Public Meeting–Bisbee	4	1	0	0	2	2
10/19/16	Intercity Route Study Public Meeting–Douglas	3	7	0	0	4	6
10/20/16	Intercity Route Study Public Meeting–Benson	7	4	0	1	4	8
10/20/16	Intercity Route Study Public Meeting–Sierra Vista	16	3	0	3	9	13
10/24/16	Strategic Highway Safety Plan Public Meeting - Safford	5	2	1	1	7	2
02/03/17	Intercity Route Study Public Meeting–Sierra Vista	12	5	0	4	9	12
02/03/17	Intercity Route Study Public Meeting–Benson	9	3	0	1	4	9
02/03/17	Intercity Route Study Public Meeting–Bisbee	9	5	1	2	8	9
02/04/17	Intercity Route Study Public Meeting–Douglas	2	9	0	0	5	6

**VI. TITLE VI COMPLAINT PROCESS**

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. The complaint must be (a) unequal treatment because of race, color, national origin, gender, age, Limited English Proficiency, income, and/or disability, or (b) noncompliance with Title VI rules or guidelines adopted thereunder.

The Arizona Department of Transportation (ADOT) Civil Rights Office (CRO) has the principal responsibility for processing, investigating, and resolving complaints arising as a result of transportation related operations of its sub-recipients such as SEAGO. SEAGO will be responsible for processing, investigating and resolving complaints of discrimination by its member agencies. Complaints must be submitted in writing to:

**John Merideth, Title VI Coordinator**  
**SouthEastern Arizona Governments Organization**  
**1403 W. Highway 92**  
**Bisbee, AZ 85603**

**A person may also file a complaint directly with the Arizona Department of Transportation Civil Rights Office at 206 South 17<sup>th</sup> Avenue, Phoenix, Arizona 85007.**

SEAGO will investigate complaints received no more than 180 days after the alleged incident. The complaint must be (a) unequal treatment because of race, color, national origin, gender, age, Limited English Proficiency, income, and/or disability, or (b) noncompliance with Title VI rules or guidelines adopted thereunder. Once the complaint is received, SEAGO will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

SEAGO has 45 days to investigate the complaint. If more information is needed to resolve the case, SEAGO may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, SEAGO can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

Within 60 calendar days of the acceptance of the complaint, the investigator will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.

SEAGO will immediately notify ADOT's Civil Rights Office of any transit related complaints and provide a copy of the final investigation report to their Civil Rights Office. A formal complaint must be filed within 180 calendar days of the alleged act of discrimination or 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 49CFR 21.11(b).

The complaint must meet the following requirements:

- a. Complaint shall be in writing and signed by the complainant(s) and must include complainant(s) name, address, and phone number. The Title VI Coordinator or a liaison will assist the complainant with documenting the issues if necessary.
- b. Present a 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.
- c. Present a detailed description of the issues including names and job titles of those individuals perceived as parties in the complained-of-incident.
- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity (is) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal for SEAGO to be able to process it.
- e. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be

- forwarded to the complainant for him/her to complete, sign, and return to SEAGO for processing.
- f. Within 45 calendar days of the acceptance of the complaint, the SEAGO investigator will prepare a draft investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
  - g. SEAGO's final investigative report with the preliminary findings and a copy of the complaint will be forwarded by certified mail to either ADOT, FHWA (Arizona Division office Civil Rights Specialist), FTA or FAA or NHTSA, within 60 calendar days of the acceptance of the complaint, per 23 CFR 200.9(b)(3).

A complainant dissatisfied with USDOT's final agency decision may file action with the appropriate US District Court.

## VII. TITLE VI COMPLAINTS, INVESTIGATIONS, OR LAWSUITS FILED

SEAGO maintains data on any complaints, investigations or lawsuits relating to discrimination filed against SEAGO and reports on the status and outcome of such incidences annually. ***During the period from August 1, 2016 through August 1, 2017, there were no complaints, investigations or lawsuits relating to discrimination filed against SEAGO.***

## VIII. PENDING APPLICATIONS FOR FEDERAL ASSISTANCE

SEAGO reports the federal funding sources that it receives direct funding from each year. SEAGO currently applies annually for federal funds directly from the U.S. Department of Commerce. SEAGO also receives federal pass through funding from a number of state agencies, including but not limited to ADOT, Arizona Department of Housing, and the Arizona Department of Economic Security.

## IX. COMPLIANCE REVIEWS/COMPLIANCE STATEMENT

SEAGO reports any compliance reviews performed during the preceding year and the status of SEAGO's compliance with Title VI requirements. During the 2017 Fiscal Year, ADOT reviewed SEAGO's 2017 Title VI Plan. ADOT provided SEAGO with information on needed changes to the plan. Changes included the need for a policy statement, the addition of an organization chart, the inclusion of a training section, the addition of a complaint log, and updates to our complaint process. SEAGO implemented those changes. No other compliance reviews have been performed during the preceding year and we are believed to be in substantial compliance with the spirit of the law.

## X. PLAN EVALUATION/REVISIONS

SEAGO evaluates the Title VI Implementation and Public Participation Plan annually and reports any new practices or changes to be implemented the following year. We had substantial public involvement in FY17 due to two planning studies. We believe that the public outreach activities we have employed are adequate to provide meaningful opportunities to participate in SEAGO planning activities, and are appropriate given current funding limitations.

***SEAGO did not have any significant changes to policy or management. Therefore a new plan was not developed plan for 2017.***

***2017 SEAGO Assurances were signed and delivered to ADOT as required.***

## **XI. TITLE VI GOALS FOR FY18**

- 1) Ensure all SEAGO staff are trained involving the SEAGO Title VI Program.
- 2) Ensure that SEAGO transportation staff attend at least one state level training involving Title VI compliance.
- 3) Respond to and investigate any complaints within the timeframe and in accordance with the procedures outlined in the SEAGO Title VI Plan.
- 4) Conduct a review of the SEAGO Title VI notification and distribution system involving transportation planning activities and identify methods to improve outreach to underserved populations.
- 5) Develop a survey instrument to gather public input involving SEAGO public participation activities.

***The following is an updated list of our member communities:***

### Executive Board

The member agencies of SEAGO are represented on the Executive Board by elected officials and by Private Sector Representatives appointed by the Executive Board members in accordance with Economic Development Administration requirements. It is the function of the Executive Board to act as a policy body, coordinating transportation planning and related implementation activities within the four-county SEAGO region. All changes to our Executive Board membership are reflected in the chart below:

<b>Community</b>	<b>Executive Board Representative</b>
Cochise County	Hon. Peggy Judd, Supervisor
City of Benson	Hon. Toney King, Mayor
City of Bisbee	Hon. David Smith, Mayor
City of Douglas	Hon. Robert Uribe, Mayor
Town of Huachuca City	Hon. Ken Taylor, Mayor
City of Sierra Vista	Hon. Rick Mueller, Mayor
City of Tombstone	Hon. Bill Barlow, Council Member
City of Willcox	Hon. Gerald Lindsey, Council Member
Private Sector Representative	Rep. Mark Schmitt, Cochise County
Private Sector Representative	Rep. Iona Smerekanich
Graham County	Hon. Danny Smith, Supervisor
Town of Pima	Hon. Tom Claridge, Mayor
City of Safford	Hon. Richard Ortega, Council Member
Town of Thatcher	Hon. Bob Rivera, Mayor
San Carlos Apache Tribe	Hon. Terry Rambler, Tribal Chairman
Private Sector Representative	Rep. Patrick O'Donnell

Greenlee County	Hon. David Gomez, Supervisor
Town of Clifton	Hon. Luis Montoya, Council Member
Town of Duncan	Hon. Billy Waters, Mayor
Private Sector Representative	Rep. Dustie L. Robinette, Greenlee County
<b>Santa Cruz County</b>	<b>Hon. Bruce Bracker, Supervisor</b>
City of Nogales	Hon. John Doyle, Mayor
Town of Patagonia	Hon. Ike Isakson, Mayor
<b>Private Sector Representative</b>	<b>Rep. Tony Sedgwick Jr., Santa Cruz County</b>

### Administrative Council

The member agencies of SEAGO are also represented on the Administrative Council. The Administrative Council is comprised of the city, town, county, and tribal government managers or their designees. It is the function of the Administrative Council to provide recommendations to the Executive Board regarding business and policy matters of SEAGO. The current Administrative Council membership is shown in the table below with changes highlighted:

<b>Community</b>	<b>Administrative Council Representative</b>
<b>Cochise County</b>	<b>Ed Gilligan, Administrator</b>
City of Benson	William Stephens, Manager
<b>City of Bisbee</b>	<b>Keri Bagley, Interim Manager</b>
<b>City of Douglas</b>	<b>James Russell, Interim Manager</b>
Town of Huachuca City	Tammy Mitchell, Clerk/Administrator
<b>City of Sierra Vista</b>	<b>Matt McLachlan, Community Dev. Manager</b>
City of Tombstone	Donna Driskoll, Clerk
City of Willcox	Tedmond Soltis, Manager
Graham County	Terry Cooper, Manager
<b>Town of Pima</b>	<b>Sean Lewis, Manager</b>
City of Safford	Horatio Skeete, Manager
Town of Thatcher	Terry Hinton, Manager
San Carlos Apache Tribe	Marvin Mull, Planner
Greenlee County	Kay Gale, Administrator
Town of Clifton	Ian McGaughey, Manager
Town of Duncan	John Basteen, Manager
Santa Cruz County	Jennifer St. John, Manager
City of Nogales	Carlos Rivera, Manager
Town of Patagonia	Dave Teel, Manager

### Technical Advisory Committee

The SEAGO Technical Advisory Committee (TAC) is the transportation advisory committee to the Administrative Council and Executive Board. The voting members of the TAC are comprised of an appointed representative from each public works department of each member entity (or

the local equivalent), and an ADOT representative. The TAC has the authority, and primary responsibility to conduct technical reviews regarding all work activities of the Work Program; to recommend project awards; and to advise the Administrative Council and Executive Board on appropriate actions to be taken for the overall transportation planning policies and direction of the region. The current TAC membership is shown in the table below with changes highlighted:

<b>Community</b>	<b>TAC Representative</b>
Cochise County	Karen Lamberton, Transportation Planner
City of Benson	Brad Hamilton, Public Works Director
City of Bisbee	Andy Haratyk, Public Works Director
City of Douglas	Lauren Ortega, Public Works Director
Town of Huachuca City	Vacant
City of Tombstone	Donna Driskell, Town Clerk
City of Willcox	Gary Adams, Public Works Supervisor
Graham County	Michael Bryce, County Engineer
<b>Town of Pima</b>	<b>Sean Lewis, Manager</b>
City of Safford	Randy Petty, City Engineer
Town of Thatcher	Heath Brown, Town Engineer
San Carlos Apache Tribe	Charlie Russell, Director, Transportation Dept. Mgr.
Greenlee County	Phil Ronnerud, County Engineer
Town of Clifton	Ian McGaughey, Manager
Town of Duncan	John Basteen, Manager
Santa Cruz County	Jesus Valdez, Deputy Public Works Director
City of Nogales	Juan Guerra, City Engineer
Town of Patagonia	Dave Teel, Manager
ADOT	Mark Hoffman, ADOT MPD

**Ethnicity and Gender Statistics for SEAGO Committees**

The current ethnicity and gender of SEAGO’s primary committees is shown in the table below with changes highlighted:

<b>SEAGO Committees</b>	<b>ETHNICITY</b>				<b>GENDER</b>	
	<b>White</b>	<b>Hispanic</b>	<b>Native American</b>	<b>Other</b>	<b>Male</b>	<b>Female</b>
Administrative Council	16	1	1	1	14	5
TAC	13	2	1	0	14	2

**XII. DEMOGRAPHIC COMPOSITION OF THE SEAGO REGION**

A table containing the demographic composition of the SEAGO region’s population begins on the following page.



**Demographic Composition  
of the SEAGO Region**

Geographic Area	Total Population	Race								Hispanic or Latino (of any race)
		One Race							Two or More Races	
		Population - One Race	White Alone	Black or African American, Alone	American Indian or Alaska Native, Alone	Asian, Alone	Native Hawaiian and Other Pacific Islander, Alone	Some Other Race, Alone		
<b>Cochise County Total</b>	<b>131,346</b>	<b>126,071</b>	<b>103,085</b>	<b>5,465</b>	<b>1,589</b>	<b>2,525</b>	<b>418</b>	<b>12,989</b>	<b>5,275</b>	<b>42,543</b>
<b>PLACES</b>										
Benson, City	5,105	4,922	4,481	51	49	37	8	296	183	1,126
Bisbee, City	5,575	5,370	4,696	80	81	26	8	479	205	2,019
Douglas, City	17,378	16,926	11,848	483	296	81	10	4,208	452	14,353
Huachuca City, Town	1,853	1,753	1,429	119	26	38	15	126	100	364
Sierra Vista, City	43,888	41,373	32,695	3,951	467	1,781	269	2,210	2,515	8,527
Tombstone, City	1,380	1,333	1,269	6	9	9	1	39	47	288
Willcox, City	3,757	3,643	2,539	43	48	25	7	981	114	1,883
<b>TOTAL PLACES</b>	<b>78,936</b>	<b>75,320</b>	<b>58,957</b>	<b>4,733</b>	<b>976</b>	<b>1,997</b>	<b>318</b>	<b>8,339</b>	<b>3,616</b>	<b>28,560</b>
<b>Graham County Total</b>	<b>37,220</b>	<b>36,172</b>	<b>26,827</b>	<b>683</b>	<b>5,376</b>	<b>200</b>	<b>52</b>	<b>3,034</b>	<b>1,048</b>	<b>11,320</b>
<b>PLACES</b>										
Pima, Town	2,387	2,300	2,086	9	15	3	3	184	87	500
Safford, City	9,566	9,210	7,789	116	153	85	5	1,062	356	4,166
Thatcher, Town	4,865	4,698	4,143	87	88	35	11	334	167	1,052
San Carlos Apache Tribe	4,780	4,612	19	1	4,591	0	1	0	16	152
<b>TOTAL PLACES</b>	<b>21,598</b>	<b>20,820</b>	<b>14,037</b>	<b>213</b>	<b>4,847</b>	<b>123</b>	<b>20</b>	<b>1,580</b>	<b>626</b>	<b>5,870</b>
<b>Greenlee County Total</b>	<b>8,437</b>	<b>8,117</b>	<b>6,514</b>	<b>89</b>	<b>195</b>	<b>46</b>	<b>5</b>	<b>1,268</b>	<b>320</b>	<b>4,040</b>
<b>PLACES</b>										
Clifton, Town	3,311	3,140	2,342	28	109	23	3	635	171	1,991
Duncan, town	696	671	563	8	12	0	1	87	25	235
<b>TOTAL PLACES</b>	<b>4,007</b>	<b>3,811</b>	<b>2,905</b>	<b>36</b>	<b>121</b>	<b>23</b>	<b>4</b>	<b>722</b>	<b>196</b>	<b>2,226</b>
<b>Santa Cruz County Total</b>	<b>47,420</b>	<b>46,467</b>	<b>34,835</b>	<b>179</b>	<b>328</b>	<b>255</b>	<b>15</b>	<b>10,855</b>	<b>953</b>	<b>39,273</b>
<b>PLACES</b>										
Nogales, City	20,837	20,338	14,933	75	140	126	4	5,060	499	19,793
Patagonia, Town	913	903	801	2	20	0	0	80	10	387
<b>TOTAL PLACES</b>	<b>21,750</b>	<b>21,241</b>	<b>15,734</b>	<b>77</b>	<b>160</b>	<b>126</b>	<b>4</b>	<b>5,140</b>	<b>509</b>	<b>20,180</b>
<b>TOTAL SEAGO REGION</b>	<b>224,423</b>	<b>216,827</b>	<b>171,261</b>	<b>6,416</b>	<b>7,488</b>	<b>3,026</b>	<b>490</b>	<b>28,146</b>	<b>7,596</b>	<b>97,176</b>

Source: U.S. Census Bureau, 2010 Census  
2010 Census Redistricting Data  
(Public Law 94-171) Summary File  
Tables P1 and P2

### **XIII. TITLE VI NOTICE TO THE PUBLIC**

#### **Title VI Notice to Public**

The SouthEastern Arizona Governments Organization, (SEAGO), complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. SEAGO operates without regard to race, color, national origin, age, gender, disability, income status, or level of English proficiency. SEAGO meetings are held in accessible locations, and materials are provided in accessible formats or in languages other than English upon request with a reasonable advance notice period.

Any person who believes they have been discriminated against by SEAGO, or any of its sub-recipients or contractors, may file a written complaint with SEAGO and/or the ADOT Civil Rights Office. If the complaint is filed against SEAGO, the SEAGO Title VI Coordinator is required to forward the complaint to the ADOT Civil Rights Office. All complaints will be promptly investigated by the ADOT Civil Rights Office.

#### **EL AVISO PUBLICO**

La Arizona gobiernos organización (SEAGO) cumple con el título VI de la ley de derechos civiles de 1964 y estatutos y reglamentos relacionados en todos los programas y actividades. SEAGO funciona independientemente de raza, color, origen nacional, edad, sexo, incapacidad, nivel de ingreso, o aptitud con ingles. Las reuniones de SEAGO se ocurren en lugares de acceso y materiales se proporcionan en formatos accesibles o en idiomas distintos del ingles, si se reciben una peticion antes de la reunion.

Cualquier persona que cree que han sido discriminados por SEAGO, o cualquiera de sus subreceptores o contratistas, puede presentar una queja por escrito a SEAGO o la oficina de derechos civiles de ADOT. Si la queja es contra SEAGO, el enlace de SEAGO para TÍTULO VI enviara la queja a la ofcina de derechos civiles de ADOT. Todas las quejas se investigaran inmediatamente por la oficina de derechos civiles de ADOT.

#### **CONTACT INFORMATION:**

SouthEastern Governments Organization  
John Merideth, Title VI Coordinator  
1403 W. Highway 92  
Bisbee, Arizona 85603  
Phone: 520-432-5301 extension 212  
Email: [jmerideth@seago.org](mailto:jmerideth@seago.org)

**XIV. SEAGO PUBLIC MEETING LOG**

Date	Location	Name of Meeting	Meeting Purpose
07/13/2016	Sierra Vista	Strategic Highway Safety Plan Public Meeting	Regional Highway Safety Planning
07/22/2016	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
08/04/2016	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
08/11/2016	Benson	SEAGO Grant Management Workshop	Regional Training
08/19/2016	Clifton	SEAGO Executive Board Meeting	SEAGO General Business
08/23/2016	Safford	Graham/Greenlee Coordination Meeting	Regional Transit Planning
08/24/2016	Bisbee	Cochise County Intercity Feasibility Study TAC	Regional Transit Planning
08/30/2016	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
09/08/2016	Benson	SEAGO Grant Compliance Workshop	Regional Training
09/15/2016	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
10/04/2016	Sierra Vista	SEAGO Regional Coordination Meeting	Regional Transit Planning
10/19/2016	Douglas	Route Feasibility Study Public Meeting	Regional Transit Planning
10/19/2016	Bisbee	Route Feasibility Study Public Meeting	Regional Transit Planning
10/20/2016	Benson	Route Feasibility Study Public Meeting	Regional Transit Planning
10/20/2016	Sierra Vista	Route Feasibility Study Public Meeting	Regional Transit Planning
10/20/2016	Willcox	SEAGO Advisory Council on Aging	Regional Aging Issues
10/24/2016	Safford	Strategic Highway Safety Plan Public Meeting	Regional Highway Safety Planning
11/03/2016	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
11/08/2016	Safford	Graham/Greenlee Coordination Meeting	Regional Transit Planning
11/16/2016	Nogales	SEAGO Executive Board Meeting	SEAGO General Business
11/22/2016	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
01/10/2017	Bisbee	Cochise County Intercity Feasibility Study TAC	Regional Transit Planning
01/12/2017	Sierra Vista	SEAGO Regional Coordination Meeting	Regional Transit Planning
01/19/2017	Willcox	SEAGO Advisory Council on Aging	Regional Aging Issues
01/26/2017	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning

02/04/2017	Sierra Vista	Route Feasibility Study Public Meeting	Regional Transit Planning
02/04/2017	Benson	Route Feasibility Study Public Meeting	Regional Transit Planning
02/04/2017	Bisbee	Route Feasibility Study Public Meeting	Regional Transit Planning
02/05/2017	Douglas	Route Feasibility Study Public Meeting	Regional Transit Planning
02/09/2017	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
02/09/2017	Benson	SEAGO Strategic Planning Workshop	SEAGO Strategic Plan Update
02/10/2017	Benson	SEAGO Strategic Planning Workshop	SEAGO Strategic Plan Update
02/14/2017	Safford	Graham/Greenlee Coordination Meeting	Regional Transit Planning
02/23/2017	Sierra Vista	SEAGO Regional Coordination Meeting	Regional Transit Planning
02/24/2017	Tombstone	SEAGO Executive Board Meeting	SEAGO General Business
03/01/2017	Bisbee	Cochise County Intercity Feasibility Study TAC	Regional Transit Planning
03/02/2017	Bisbee	TAP Royal Intercity Service Meeting	Regional Transit Planning
03/13/2017	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
03/16/2017	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
04/20/2017	Willcox	SEAGO Advisory Council on Aging	Regional Aging Issues
05/04/2017	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
05/09/2017	Safford	Graham/Greenlee Coordination Meeting	Regional Transit Planning
05/18/2017	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
05/19/2017	Safford	SEAGO Executive Board Meeting	SEAGO General Business