

SouthEastern Arizona Governments Organization



Title VI Goals and Accomplishments Report

Relating to Transportation Planning and Improvements

August 1, 2019

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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 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
Legacy Foundation of Southeast Arizona	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.

- Four (4) Advisory Council on Aging (ACOA) meetings, held quarterly at the United Methodist Church in Willcox. 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.
- Eight (8) 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.
- Seven (7) 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 various 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.
- Three (3) 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.
- Seven (7) Cochise Connection Technical Advisory Committee meetings. The purpose of these meetings is to include local governments, transit providers, and regional stakeholders in the regional transit planning process.
- Nine (9) 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.
- Six (6) Douglas 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 and community issues in the Douglas area.
- Twelve (12) Training Workshops. SEAGO receives FTA Section 5310 funding to provide a rural Arizona Training Program. All trainings are open to the public free of charge and focus on improving transit safety, grant development, operations, and program management.

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 19, in an effort to support our regional planning efforts, ***SEAGO conducted three specialized public involvement efforts to introduce the community to the region's public transportation services.***

- **Willcox Feasibility Study:** SEAGO was awarded a transit planning grant by the Arizona Department of Transportation to conduct a Willcox Transit Feasibility Study. The purpose of the study was to evaluate the feasibility of public bus service (FTA Section 5311) that would serve Willcox and possibly its surrounding communities of Bowie, Cochise, Kansas Settlement, Pearce/Sunsites and Winchester Heights. SEAGO conducted Public Meetings to promote the new service options. Of those represented over 19 agencies attended these events.

The following table reflects the ethnicity and gender of these attendees:

ACTIVITY		ETHNICITY				GENDER	
Date	Name of a Activity	White	Hispanic	Native American	Other	Male	Female
09/25/18	Willcox Transit Feasibility Study	8	1	0	0	1	7
11/27/18	Willcox Transit Feasibility Study	12	1	0	0	1	11
01/29/19	Willcox Transit Feasibility Study	10	0	0	0	2	8
02/26/19	Willcox Transit Feasibility Study	10	0	0	0	2	8
04/23/19	Willcox Feasibility Study TAC Meeting (Willcox)	10	2	0	0	1	11
05/28/19	Willcox Public Meetings (Willcox Community Building)	8	2	0	0	3	7
05/28/19	Willcox Public Meeting (Willcox County Health Dept.)	17	1	0	0	3	15
06/25/19	Willcox Public Meetings (Willcox)	10	2	0	0	5	7

III. TITLE VI TRAINING/TECHNICAL ASSISTANCE

Training

SEAGO staff are trained annually involving Title VI. Training will be provided by the Title VI Coordinator on August 5, 2019 to all SEAGO staff (14 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 delivered FTA Section 5310 and FTA Section 5311 grant recipients with Title VI Training August 9, 2018 at the Regional Transportation Coordination Meeting. The training on Title VI was through a PowerPoint presentation. The goal is to ensure that our providers are aware of the purpose of Title VI, the protected classes, and the Title VI complaint process. The Training was attended by 27 people representing FTA Section 5310/5311 agencies. SEAGO also provided a refresher of the rules that apply to public meetings and Title VI at the October 11, 2018 and February 14, 2019 Cochise and Santa Cruz County Transportation Coordination Meeting.

SEAGO participated in ADOT's FHWA and FTA ADA Title VI Implementation Plan Webinar on November 13, 2018.

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 11 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. PROGRAM AREA REVIEWS

In 2019, SEAGO conducted three (3) program area reviews:

1. Website – SEAGO reviewed its Title VI website to ensure necessary documents were available. The site was checked for the Public Notice, Complaint Procedures, Title VI Plan, Complaint Form, Goals and Accomplishment Report were present and accessible. Ensured Title VI Coordinator Information was accurate and easily accessible. No issues were found.
2. Public Meeting Notices – Public meeting notification processes were reviewed to ensure meetings notices were posted in a timely manner, that meeting notices and agendas are distributed via email to agencies that provide direct services to Title VI protected populations, and that the following statement is conveyed on each meeting agenda in both English and Spanish: “Individuals with disabilities who require special accommodations may contact Jessica Urrea at (520) 432-5301 extension 215 at least 72 hours before the meeting time to request such accommodations.” No issues were found.
3. Outreach Materials – SEAGO reviewed several outreach materials developed to ensure that they were provided in both English and Spanish. No issues were found.

V. 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 tables, Table DP-2), there were 70,923 people in the SEAGO region (or approximately 32% of the region's population) who reported that they spoke Spanish in the home. Of those individuals, only 22,569 (or approximately 10.25% 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 2019, SEAGO received no requests for LEP services.***

VI. PUBLIC PARTICIPATION DATA

In FY19, SEAGO hosted 57 meetings that were open to the public. Our ***Public Meeting Log*** can be found on pages 20 - 22 of this report.

In FY19, SEAGO hosted 8 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 PUBLIC MEETINGS		ETHNICITY				GENDER	
Date	Name of Meeting	White	Hispanic	Native American	Other	Male	Female
7/12/18	Cochise/Santa Cruz Transit Coordination Meeting Benson	11	6	0	3	11	9
8/9/18	Regional Transit Coordination Meeting Benson	20	6	0	3	11	18
10/11/18	Cochise/Santa Cruz Transit Coordination Meeting Benson	10	8	0	0	5	13
11/07/18	Graham/Greenlee Transit Coordination Meeting Safford	7	3	0	1	3	8
2/12/19	Graham/Greenlee Transit Coordination Meeting Safford	4	4	1	1	2	8
2/14/19	Cochise/Santa Cruz Transit Coordination Meeting Benson	10	7	0	2	9	10
2/20/19	Douglas Turning Point	5	6	0	0	4	7
6/18/19	Regional Transit Coordination Meeting Benson	14	9	0	2	11	14

In FY19, SEAGO hosted 12 Training Workshops that were open to the public. The SEAGO Training Program supports regional/statewide transportation training goals. The following table reflects the ethnicity and gender of meeting attendees:

SEAGO TRAININGS		ETHNICITY				GENDER	
Date	Name of Training	White	Hispanic	Native American	Other	Male	Female

7/21/18	PASS 6.0 Safford	7	2	0	0	2	7
8/03/18	15 Minute Manager: Train the Trainer Coolidge	6	2	0	0	3	5
8/07/18	15 Minute Manager: Train the Trainer Flagstaff	7	0	5	0	0	12
9/14/18	PASS 6.0 Florence	5	3	0	0	2	6
9/17/18	Grant Writing Phoenix	19	12	1	1	12	21
11/02/18	PASS 6.0 Prescott	6	0	4	0	6	4
11/03/18	PASS 6.0 Prescott	6	0	4	0	5	5
3/30/19	PASS 6.0 Nogales	39	0	0	0	9	30
4/26/19	PASS 6.0 Florence	5	2	0	0	2	5
6/12/19	PASS 6.0 Second Mesa	0	0	8	0	3	5
6/14/19	PASS 6.0 Show Low	8	1	0	0	4	5
6/21/19	PASS 6.0 Florence	7	0	0	2	7	2

VII. NON-DISCRIMINATION COMPLAINT PROCEDURES (Updated 8/1/2018)

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 as they relate to any Federal Highway Administration or Federal Transit Administration funded program or activity administered by the SEAGO, its subrecipients, 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.

1. Required Procedures for FHWA and FTA Title VI/ADA Non-discrimination Complaints filed against SEAGO:

- a. Title VI complaints filed against SEAGO in FHWA-funded programs will be referred to ADOT's Civil Rights Office within 72 hours for processing and investigation. ADOT CRO's processing of the complaint will follow ADOT complaint processing procedures as per ADOT's FHWA Title VI Implementation plan at <https://www.azdot.gov/business/civil-rights/title-vi-nondiscrimination-program/title-vi-implementation>.
- b. The complainant may also file a discrimination related complaint on an FHWA program or activity directly with ADOT or with the Federal Highway Administration by contacting the agencies at:

ADOT Civil Rights Office 206 S. 17th Avenue, Mail Drop 155-A Phoenix, AZ 85007	Federal Highway Administration U.S. Department of Transportation Office of Civil Rights
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Phone: 602.712.8946 Fax: 602.239.6257 Civilrightsoffice@azdot.gov	1200 New Jersey Avenue, SE 8th Floor E81-105 Washington, DC 20590 Email: CivilRights.FHWA@dot.gov Phone: 202-366-0693 Fax: 202-366-1599
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2. For FTA funded programs or activities; the complainant may file a discrimination related complaint directly with SEAGO at:

Randy Heiss, Executive Director
1403 W. Highway 92
Bisbee, AZ 85603
Phone: (520) 432-5301 Extension 202
Fax: (520) 432-5858
Email: rheiss@seago.org

Or with ADOT or with the Federal Transit Administration by contacting the agencies at:

ADOT Civil Rights Office 206 S. 17th Avenue, Mail Drop 155-A Phoenix, AZ 85007 Phone: 602.712.8946 Fax: 602.239.6257 Civilrightsoffice@azdot.gov	FTA Office of Civil Rights 1200 New Jersey Avenue SE, Washington, DC20590
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3. Required Procedures for FHWA Title VI Complaints filed against SEAGO's, subrecipient, contractor or consultant:

- a. Any person, specific class of persons or entity that believes they have been subjected to discrimination on an FHWA- or FTA 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 SEAGO. A copy of the Complaint Form may be accessed electronically at: <http://www.seago.org/tsp/title6.html>.
- b. 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.
- c. Complaints should be in writing and signed; they may be filed by mail, fax, in person, or email. However, the complainant may call the agency to provide the allegations by telephone; the agency will transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the complainant for acknowledgement and signature.

- d. A complaint should contain at least the following information:
 - A written explanation of what has happened;
 - A way to contact the complainant;
 - The basis of the complaint (e.g., race, color, national origin);
 - The identification of a specific person/people and the respondent (e.g., agency/organization) alleged to have discriminated;
 - Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives FHWA or FTA financial assistance; a consultant, contractor or subrecipient of SEAGO and
 - The date(s) of the alleged discriminatory act(s).
- e. Upon receipt of a completed complaint, SEAGO will determine jurisdiction, acceptability or need for additional information. Once the determination has been made to accept the complaint for investigation, ADOT CRO will be notified. Title VI complaints against SEAGO's subrecipient, contractors or consultants in FHWA or FTA-funded programs will be investigated by the SEAGO.
- f. SEAGO will maintain a confidential log of all accepted Title VI Complaints for four (4) years; the log will include:
 - Name of complainant(s)
 - Date the complaint was received
 - Date of the allegation
 - Description of the alleged discrimination
 - Other relevant information, as needed
 - Report date
 - Recommendations
 - Outcome/Disposition
- g. Timeframes for Investigating Title VI complaints received directly by SEAGO must be completed within 60 days from receipt.
- h. SEAGO will forward a copy of FHWA Title VI complaints and preliminary findings reports to ADOT CRO within 60 days. Once ADOT CRO issues concurrence on preliminary report, SEAGO will notify all parties involved.

4. Complaint Form

SEAGO will use **ADOT's Title VI Complaint Form**.

If information is needed in another language, please contact SEAGO at 520-432-5301. Si se necesita información en Español, por favor comuníquese con la Oficina SEAGO al 520-432-5301.

VIII. 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 July 1, 2018 through June 30, 2019, there were no complaints, investigations or lawsuits relating to discrimination filed against SEAGO.***

IX. 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.

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 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 recently updated its 2019 Title VI Plan. The following changes are reflected in our FY20 Title VI Plan:***

1. **New Transportation Program Administrator** – On June 17, 2019, Jim Russell assumed the responsibilities of SEAGO Transportation Program Administrator. This position is responsible for the day-to-day administration and oversight of all SEAGO transportation related subprograms and personnel.
2. **SEAGO Membership** – The SEAGO Executive Board, Administrative Council, and the Transportation Advisory Committee underwent several changes. The membership tables were updated.
3. **Population and Demographic Profile** – The demographic profile that was developed for the region last year has been updated in FY19
4. **SEAGO Organization Chart** – The SEAGO organization Chart was updated to reflect a change in Title VI Coordinator responsibilities.
5. **SEAGO Demographic Data** – This data was updated using information from MAG's demographic viewer.

XI. TITLE VI GOALS FOR FY20

- 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) Conduct at least three (3) compliance reviews of SEAGO program areas.
- 4) Respond to and investigate any complaints within the timeframe and in accordance with the procedures outlined in the SEAGO Title VI Plan.
- 5) 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.
- 6) 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:

Community	Executive Board Representative
Cochise County	Ann English, Supervisor
City of Benson	Hon. Toney King, Mayor
City of Bisbee	Hon. David Smith, Mayor
City of Douglas	Cesar Soto, Council Member
Town of Huachuca City	Donna Johnson, Vice Mayor
City of Sierra Vista	Rachel Gray, Council Member
City of Tombstone	Hon. Bill Barlow, Council Member
City of Willcox	Mike Laws, Mayor
Private Sector Representative	Rep. Barbara Richardson, Cochise County
Private Sector Representative	Rep. Iona Smerekanich
Graham County	Hon. Paul David, County Supervisor
Town of Pima	Hon. C.B. Fletcher, Mayor
City of Safford	Hon. Richard Ortega, Vice Mayor
Town of Thatcher	Hon. Bob Rivera, Mayor
San Carlos Apache Tribe	Allred Pike Jr., Tribal Chairman
Private Sector Representative	Rep. Patrick O'Donnell, Graham County
Greenlee County	Hon. David Gomez, County Supervisor
Town of Clifton	Hon. Luis Montoya, Mayor
Town of Duncan	Hon. Anne Thurman, Mayor
Private Sector Representative	Vacant – TBD, Greenlee County
Santa Cruz County	Hon. Bruce Bracker, County Supervisor
City of Nogales	Hon. Arturo Garino, Mayor
Town of Patagonia	Hon. Andrea Wood, Mayor
Private Sector Representative	Rep. Tony Sedgwick Jr., Santa Cruz County

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:

Community	Administrative Council Representative
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Cochise County	Dan Coxworth, County Administrator
City of Benson	Vicki Vivian, City Manager
City of Bisbee	Teresa Coleman, City Manager
City of Douglas	Jerene Watson, Interim City Manager
Town of Huachuca City	Matthew Williams, Town Manager
City of Sierra Vista	Matt McLachlan, Community Dev. Manager
City of Tombstone	Regina Duran
City of Willcox	Caleb Blaschke, City Manager
Graham County	Dustin Welker, County Administrator
Town of Pima	Sean Lewis, Town Manager
City of Safford	Horatio Skeete, City Manager
Town of Thatcher	Heath Brown, Town Manager
San Carlos Apache Tribe	Marvin Mull, Planner
Greenlee County	Kay Gale, Administrator
Town of Clifton	Rudy Perez, Town Manager
Town of Duncan	John Basteen, Town Manager
Santa Cruz County	Jennifer St. John, County Administrator
City of Nogales	John Kissinger, Deputy City Manager
Town of Patagonia	Ronald Robinson, Town 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:

Community	TAC Representative
Cochise County	Jackie Watkins, Engineering Director
City of Benson	Michelle Johnson, City Planner
City of Bisbee	Jesus Haro, Public Works Director
City of Douglas	Vacant – TBD, Public Works Director
City of Tombstone	Regina Duran, Clerk
City of Willcox	Gary Adams, Streets Superintendent
Graham County	Michael Bryce, County Engineer
Town of Pima	Sean Lewis, Town Manager
City of Safford	Randy Petty, City Engineer
Town of Thatcher	Tom Palmer, Public Works Director
San Carlos Apache Tribe	Charles Russell, Director, Transportation Dept. Planner
Greenlee County	Phil Ronnerud, County Engineer
Town of Clifton	Rudy Perez, Town Manager
Town of Duncan	John Basteen, Manager

Santa Cruz County	Jesus Valdez, Public Works Director
City of Nogales	Juan Guerra, City Engineer
Town of Patagonia	Ronald Robinson, Town 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:

SEAGO Committees	ETHNICITY				GENDER	
	White	Hispanic	Native American	Other	Male	Female
Executive Board	16	6	1	0	18	5
Administrative Council	14	3	1	1	13	6
TAC	11	5	1	0	14	3

XII. DEMOGRAPHIC COMPOSITION OF THE SEAGO REGION

A table containing the demographic composition of the SEAGO region's population begins on the following page. More detailed information from the 2013-2017 American Community Survey (ACS) 5-Year estimates and the MAG Demographic Viewer are available in SEAGO's updated Title VI Implementation and Public Participation Plan for FY 2020

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		
Cochise County Total	131,346	126,071	103,085	5,465	1,589	2,525	418	12,989	5,275	42,543
PLACES										
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

XIII. TITLE VI NOTICE TO THE 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 petición antes de la reunión.

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 oficina de derechos civiles de ADOT. Todas las quejas se investigaran inmediatamente por la oficina de derechos civiles de ADOT.

CONTACT INFORMATION:

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XIV. SEAGO PUBLIC MEETING LOG

Date	Location	Name of Meeting	Meeting Purpose
7/12/18	Benson	Cochise/Santa Cruz Joint Transportation Coordination Meeting	Regional Transit Planning
07/19/18	Willcox	SEAGO Advisory Council on Aging	Regional Aging Issues
07/19/18	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
08/02/18	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
08/03/18	Coolidge	Transit 15-Minute Manager Workshop	Transit Manager Training
08/07/18	Flagstaff	Transit 15-Minute Manager Workshop	Transit Manager Training
08/09/18	Benson	SEAGO Regional Coordination Meeting	Regional Transit Planning
08/17/18	Clifton	SEAGO Executive Board Meeting	SEAGO General Business
08/28/18	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
09/14/18	Florence	PASS 6.0 Training	Transit Driver Training
09/17/18	Phoenix	Grant Writing Training	Transit Manager Training
09/28/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
10/11/19	Benson	Cochise/Santa Cruz Joint Transportation Coordination Meeting	Regional Transit Planning
10/23/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
11/01/19	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
11/02/19	Prescott	PASS 6.0 Training	Transit Driver Training
11/03/19	Prescott	PASS 6.0 Training	Transit Driver Training
11/07/19	Safford	Graham/Greenlee Joint Transportation Coordination Meeting	Regional Transit Planning
11/15/19	Benson	SEAGO Transportation Advisory Committee	Regional Transportation Planning
11/16/19	Patagonia	SEAGO Executive Board Meeting	SEAGO General Business
11/26/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning
11/27/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning

11/29/19	Bisbee	Combined Administrative and Executive Council Meeting (Conference Call)	SEAGO General Business
01/28/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning
01/29/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
02/07/19	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
02/12/19	Safford	Graham/Greenlee Joint Transportation Coordination Meeting	Regional Transit Planning
02/14/19	Benson	Cochise/Santa Cruz Joint Transportation Coordination Meeting	Regional Transit Planning
02/20/19	Douglas	Douglas Turning Point	Local Transit/Community Planning
02/25/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning
02/26/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
03/14/19	Benson	SEAGO Executive Board Meeting	SEAGO General Business
03/21/19	Benson	SEAGO Transit Advisory Committee Meeting	Regional Transportation Planning
03/25/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning
03/26/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
03/29/19	Bisbee	Combined Administrative and Executive Council Meeting (Conference Call)	SEAGO General Business
03/30/19	Nogales	PASS 6.0 Training	Transit Driver Training
04/10/19	Bisbee	Combined Administrative and Executive Council Meeting (Conference Call)	SEAGO General Business
04/23/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
04/26/19	Florence	PASS 6.0 Training	Transit Driver Training
04/29/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning
05/02/19	Benson	SEAGO Administrative Council Meeting	SEAGO General Business
05/16/19	Benson	SEAGO Transit Advisory Committee Meeting	Regional Transportation Planning
05/17/19	Safford	SEAGO Executive Board Meeting	SEAGO General Business
05/20/19	Douglas	Douglas Healthy Community Meeting	Local Transit/Community Planning

05/28/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning
05/30/19	Bisbee	Combined Administrative and Executive Board Meeting (Conference Call)	SEAGO General Business
06/12/19	Second Mesa	PASS 6.0 Training	Transit Driver Training
06/14/19	Show Low	PASS 6.0 Training	Transit Driver Training
06/18/19	Benson	SEAGO Regional Coordination Meeting	Regional Transit Planning
06/21/19	Florence	PASS 6.0 Training	Transit Driver Training
06/25/19	Willcox	Willcox Healthy Community Meeting	Local Transit Planning