

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
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 include 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.

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. ***In FY20, 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.
- **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 Department of Economic Security (DES)	State of 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/Cochise Connections	Douglas, Elfrida, Sierra Vista and Pirtleville
City of Sierra Vista – Vista Transit	Sierra Vista
City of Nogales – Nogales Rides	Nogales
City of Willcox	Willcox
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
Pinal Hispanic Council	Nogales, Rio Rico, Douglas and Elfrida
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
Sr. Citizens of Patagonia	Elgin, Patagonia, Canelo and Sonoita
St. Vincent De Paul	Douglas
Town of Huachuca City	Huachuca City, Sierra Vista and Tombstone
Volunteer Interfaith Caregiver Program (ViCAP)	Sierra Vista, Benson, Hereford and Willcox
Wellness Connections a program of HOPE Inc.	Southeast Arizona
Women’s Transition Project	Cochise County

General Public Involvement Activities

The following is a list of the meetings and other activities that were open to the public or open for public comment during FY20:

- 45-day public comment period on the **DRAFT SEAGO Region 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.
- **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 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.
- **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.
- **Three (3) 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.
- **Three (3) FTA Access & Mobility Partnership Grant 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 involving this grant opportunity.
- **Eleven (11) 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.

Specialized Public Involvement Activities

In FY 20, 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.**

- **Cochise County Public Transit Consolidation Study:** SEAGO was awarded a transit planning grant by the Arizona Department of Transportation to conduct the Cochise county Public Transit Consolidation Study. The purpose of the study was to evaluate the feasibility of consolidating the FTA Section 5311 Programs of Douglas, Bisbee, and Benson under one regional operator. SEAGO conducted Public Meetings to promote the project and to gather public input. The project kicked-off on March 4, 2020, with a public kick-off meeting. **Outreach tools used to promote the meeting included:**
 - Flyers printed in English and Spanish and distributed businesses/agencies that provide direct services to Title VI protected populations.
 - Quarter-page advertisement in the local newspapers of Benson, Bisbee, Douglas, Sierra Vista, and Willcox that ran over a two-week time period.
 - Public Notices distributed to our Title VI email distribution list.
 - Invitations to the SEAGO Executive Board/Administrative Council, all area transit providers, and social service agencies that support Title VI populations.
 - Website: Meeting notices were posted on www.seago.org and our companion Mobility Management site www.azmobility.org .

The following table reflects the ethnicity and gender of attendees to our Consolidation public meetings:

ACTIVITY		ETHNICITY				GENDER	
Date	Name of a Activity	White	Hispanic	Native American	Other	Male	Female
03/04/20	CC Public Transit Consolidation Study – Public Kickoff Meeting	8	5	1	1	8	7
04/15/20	CC Public Transit Consolidation Study – TAC Meeting	10	5	0	1	7	9
06/16/20	CC Public Transit Consolidation Study – TAC Meeting	8	6	0	0	7	7
	Totals	26	16	1	2	22	23

III. TITLE VI TRAINING/TECHNICAL ASSISTANCE

Training

SEAGO staff are trained bi-annually involving Title VI. Training 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 onsite and online location of our Title VI Complaint Form. ***Title VI Training was conducted on the following dates:***

- **August 5, 2019 – 14 staff were trained**
- **February 3, 2020 – 15 staff were trained.**

SEAGO transportation staff participated in the **ADOT CRO Annual FHWA Title VI Training** on June 24, 2020, and June 25, 2020.

SEAGO transportation staff participated in the **ADOT 5311 Implementation Workshop** on October 9, 2019. The workshop included Title VI training.

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 direct assistance to the City of Willcox in the development of their Title VI plan submitted with their FTA Section 5311 grant application submitted in February 2020.**

IV. PROGRAM AREA REVIEWS

In 2020, SEAGO conducted three (3) internal program 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.***

ADOT Civil Rights Office completed an on-site review of SEAGO’s Title VI Program on February 13, 2020. A Corrective Action Plan, in response to recommendations of the review team was developed and transmitted by SEAGO to ADOT on April 22, 2020. SEAGO updated our Title VI Plan to include the on-site review recommendations from ADOT Civil Rights Office. The draft of the 2021 Title VI plan was submitted to the ADOT Civil Rights Office on June 15, 2020.

V. LIMITED ENGLISH PROFICIENCY (LEP)

Demographic information from the U.S. Census Bureau, 2014-2018 American Community Survey (ACS) 5-Year estimates indicates that approximately 45.6 percent of the region’s population is Hispanic or Latino of any race. According to the American Community Survey 24,885 (or approximately 12.1% of the region’s population) reported that they spoke English less than very well.

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 2020, SEAGO received no requests for LEP services.***

VI. PUBLIC PARTICIPATION DATA

In FY20, SEAGO hosted 8 Transit TAC/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
09/12/19	FTA Access & Mobility Partnership Grant TAC Meeting Douglas	7	3	0	0	2	8
10/10/19	Cochise/Santa Cruz Transit Coordination Meeting Benson	6	8	0	1	8	7
11/05/19	Graham/Greenlee Transit Coordination Meeting Safford	5	3	1	1	2	8
01/23/20	Cochise/Santa Cruz Transit Coordination Meeting Benson	9	8	0	2	8	11
02/4/20	FTA Access & Mobility Partnership Grant TAC Meeting Douglas	7	4	0	0	3	8
02/11/20	Graham/Greenlee Transit Coordination Meeting Safford	1	4	1	1	0	7
03/05/20	FTA Access & Mobility Partnership Grant TAC Meeting Willcox	8	5	0	0	2	11
04/29/20	Regional Transit Coordination Meeting Teleconference	11	12	0	1	8	16
6/16/20	Regional Transit Coordination Meeting Benson	8	6	0	0	7	7
	Totals	62	53	2	6	40	83

In FY20, SEAGO hosted 11 Training Workshops that were open to the public. The SEAGO Training Program supports regional/statewide transit 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
8/06/19	15 Minute Manager: Train the Trainer Prescott	6	0	9	0	2	13
8/13/19	15 Minute Manager: Train the Trainer Coolidge	6	2	0	1	4	5
8/20/19	True Cost of Transit Prescott	0	0	3	0	0	3
8/29/19	True Cost of Transit Coolidge	1	0	2	1	0	4
8/31/19	PASS Benson	9	0	0	0	4	5
9/10/19	PASS Parker	3	7	0	0	3	7
10/16/19	PASS Train-the-Trainer Tucson	6	8	4	1	9	10
10/17/19	PASS Train-the-Trainer Tucson	6	8	4	1	9	10
10/18/19	PASS Train-the-Trainer Tucson	6	8	4	1	9	10
11/23/19	PASS Nogales	0	16	0	0	3	13
3/13/20	PASS Thatcher	3	5	0	0	2	6
	Totals	46	54	26	5	45	86

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 July 1, 2018/19 through June 30, 2020, there were no complaints, investigations or lawsuits relating to discrimination filed against SEAGO.*

VIII. DEMOGRAPHIC COMPOSITION OF THE SEAGO REGION

SEAGO collects, reviews, and analyzes demographic data annually to develop a demographic profile (baseline) for the region. *SEAGO uses the most current ACS Estimates from the U.S. Census data* to identify minority, low-income, age 65+, disabled, and limited English proficient populations (see table above). The demographic profile summarizes the data for these population groups by U.S. Census Tract.

Population & Households			Census Block Groups			
Category	SEAGO		Number of block groups >= Area Percentage	% Block Groups	Affected Population	% of Affected Population Captured in Census Block Groups
	Total	Percent				
<i>Population Base</i>	220,246	N/A	177	100.0 %	N/A	N/A
<i>Minority</i>	119,846	54.4 %	72	40.7%	79,768	66.6%
<i>Below Poverty Level</i>	39,509	19.1%	74	41.8%	27,513	69.6%
<i>Age 65+</i>	40,608	18.4%	81	45.8%	26,586	65.5%
<i>Population with a Disability</i>	31,268	15.2%	86	48.6%	18,378	58.8%
<i>Limited English Proficient Persons</i>	24,885	12.1%	106	59.9%	23,046	92.6%

IX. ETHNICITY AND SEX STATISTICS FOR SEAGO BOARDS & COMMITTEES

SEAGO Boards & Committees	ETHNICITY				GENDER	
	White	Hispanic	Native American	Other	Male	Female
Executive Board	16	7	1	0	17	7
Administrative Council	16	1	1	1	14	5
TAC	12	5	1	0	15	3

X. 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.

XI. 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 2020 Title VI Plan. The following changes are reflected in our FY21 Title VI Plan:***

1. **New Transportation Program Administrator** – On December 28, 2019, Chris Vertrees returned to SEAGO and 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 to reflect the U.S. Census Bureau, 2014-2018 American Community Survey (ACS) 5-Year estimates.
4. **SEAGO Organization Chart** – The SEAGO organization Chart was updated to reflect a SEAGO's current staffing.
5. **SEAGO Demographic Data** – This data was updated using information from MAG's demographic viewer.
6. **Data Collection Procedures and Data Use for SEAGO Meetings** – This section was added to the FY21 Plan to identify how demographic data will be collected and used involving SEAGO meetings.
7. **SEAGO Meeting Sign-In Sheets** - Were updated to include ***“OPTIONAL”*** demographic data disclosure.
8. **Sub-recipient Contracts Procedure** – This procedure was added to the plan to ensure that will all sub-recipient contracts utilizing FHWA funds will include FHWA Title VI Assurance language.

XII. SEAGO TITLE VI GOALS

Progress - FY20 Title VI Goals

- 1) Ensure all SEAGO staff are trained involving the SEAGO Title VI Program. ***(Accomplished)***
- 2) Ensure that SEAGO transportation staff attend at least one state level training involving Title VI compliance. ***(Accomplished)***
- 3) Conduct at least three (3) compliance reviews of SEAGO program areas. ***(Accomplished)***
- 4) Respond to and investigate any complaints within the timeframe and in accordance with the procedures outlined in the SEAGO Title VI Plan. ***(Accomplished – No complaints received)***
- 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. ***(Accomplished – Distribution List Expanded)***
- 6) Develop a survey instrument to gather public input involving SEAGO public participation activities. ***(In Progress – Survey tool complete for training workshops and Project Kick-off meetings)***

FY21 Title VI Goals

- 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.** Continue development of survey instruments to gather public input involving SEAGO public participation activities.
- 6.** Implement the use and availability of the Census Language Identification Flashcard to identify potential LEP language barriers.
- 7.** Update SEAGO procurement and contract templates to ensure that all sub-recipient contracts utilizing FHWA funds will include FHWA Title VI Assurance language.

Title VI Complaints, Investigations and Lawsuits

Description/Name	Date Month, Day & Year	Summary (Basis of Complaint)*	Status	Actions / Final Findings
Complaints				
1)				
2)				
3)				
Investigations				
1)				
2)				
3)				
Lawsuits				
1)				
2)				
3)				

No Complaints Received

Cladish
7/22/20

Include basis of complaint.

Report to be Submitted Annually to ADOT Title VI Department