



Sun Corridor Metropolitan Planning Organization
211 North Florence Street, Suite 103
Casa Grande, AZ 85122
www.scmpo.org

TITLE VI PLAN

Nondiscrimination in Federally Assisted Programs

Relating to

Transportation Planning and Transportation Improvements

2017 Title VI Plan Endorsed and Approved By:
Sun Corridor Metropolitan Planning Organization
Executive Board
On: July 12, 2016

2017 Title VI Plan Endorsed and Approved By:
Sun Corridor Metropolitan Planning Organization
Technical Advisory Committee
On: June 30, 2016

As prepared by the

Sun Corridor Metropolitan Planning Organization

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En Española:

Para más información, o si está interesado en participar en el planeamiento del proceso de transporte en su comunidad y necesita asistencia con el idioma, por favor comuníquese:

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Sun Corridor Metropolitan Planning Organization (MPO)

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TITLE VI PLAN

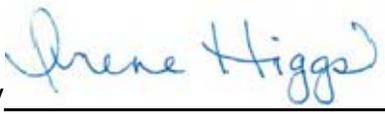
A. Introduction

The **Sun Corridor Metropolitan Planning Organization (MPO)**, as a condition to receiving Federal financing assistance from the Federal Transit Administration (FTA), Federal Highways Administration (FHWA), and Arizona Department of Transportation (ADOT) agrees to comply with the Title VI of the Civil Rights Act of 1964 and subsequent authorities.

B. Policy Statement

The Sun Corridor MPO is committed to ensuring that no person is discriminated against on the grounds of race, color, national origin, sex, age, disability, limited English proficiency, or low- income status as provided by Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (ADA), Executive Order 12898 (Environmental Justice), Executive Order 13166 (Limited Proficiency), Code of Federal Regulations 49 Part 21, Code of Federal Regulations 23 part 200, and Code of Federal Regulations Part 303.

The Sun Corridor MPO strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. As a sub-recipient of federal funding, the Sun Corridor MPO is responsible for initiating and monitoring Title VI activities, preparing required reports, technical assistance and training. The Sun Corridor MPO's contractors/consultants must also comply with this policy.

By 

Date: July 12, 2016

Irene Higgs, Executive Director – Title VI Coordinator
Sun Corridor Metropolitan Planning Organization

C. Certifications and Assurances

Sun Corridor Metropolitan Planning Organization Title VI Assurances

The **Sun Corridor Metropolitan Planning Organization (MPO)** (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Federal Highway Administration and Arizona Department of Transportation, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (*entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation--Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);
- 23 C.F.R. Part 200 Subchapter C-Civil Rights (Title VI program implementation and related statues)

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda and/or guidance, the Recipient hereby gives assurances that it will promptly take any measures necessary to ensure that:

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

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

Specific Assurances

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

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all *Federal Aid Highway Program* and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*"The **Sun Corridor Metropolitan Planning Organization**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252.42 U.S.C. §§ 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."*

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.

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4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
 5. That where the Recipient receives Federal financial assistance to a construct a facility or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
 6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
 7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project or program.
 8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
 9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official whom he/she

delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

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

By signing this ASSURANCE, **Sun Corridor Metropolitan Planning Organization (MPO)** also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing Federal Highway Administration or Arizona Department of Transportation access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration or Arizona Department of Transportation. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, Arizona Department of Transportation, or its designee in timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

Sun Corridor Metropolitan Planning Organization (MPO) gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration and Arizona Department of Transportation. This ASSURANCE is binding on Arizona, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid Highway Program the person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

By  Date: March 22, 2016
Irene Higgs, Acting Executive Director – Title VI Coordinator
Sun Corridor Metropolitan Planning Organization

Appendix A – Contractor

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, *Federal Highway Administration or the Arizona Department of Transportation*, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Nondiscrimination:** The contractor, with regard to the work performance by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient, the *Federal Highway Administration or Arizona Department of Transportation* to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient, the *Federal Highway Administration, or Arizona Department of*

Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the *Federal Highway Administration or Arizona Department of Transportation*, may determine to be appropriate, including, but not limited to:
 - a) withholding payments to the contractor under the contract until the contractor complies; and/or
 - b) cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with request to any subcontract or procurement as the Recipient, the *Federal Highway Administration, or Arizona Department of Transportation* may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Appendix B – Clauses for Deeds Transferring United States Property

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

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that **Sun Corridor Metropolitan Planning Organization** will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code the Regulations for the Administration of Federal Aid for Highways, and the policies and procedures prescribed by the Arizona Department of Transportation ,Federal Highway Administration and the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252;42 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the **Sun Corridor Metropolitan Planning Organization** all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto **Sun Corridor Metropolitan Planning Organization** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the **Sun Corridor Metropolitan Planning Organization**, its successors and assigns.

The **Sun Corridor Metropolitan Planning Organization** ,in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [.] [and]* (2) that the **Sun Corridor Metropolitan Planning Organization** will use the lands and

interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

** Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.*

Appendix C – Clause for Transfer of Real Property Acquired or Improved Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the **Sun Corridor Metropolitan Planning Organization** pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities,
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, **Sun Corridor Metropolitan Planning Organization** will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, **Sun Corridor Metropolitan Planning Organization** will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the **Sun Corridor Metropolitan Planning Organization** and its assigns*.

**Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.*

Appendix D – Clauses For Construction/Use/Access to Real Property Acquired Under The Activity, Facility or Program

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by **Sun Corridor Metropolitan Planning Organization** pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, **Sun Corridor Metropolitan Planning Organization** will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, **Sun Corridor Metropolitan Planning Organization** will there upon revert to and vest in and become the absolute property of **Sun Corridor Metropolitan Planning Organization** and its assigns.*

* *Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.*

Appendix E – Performance Of Contract

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

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing

entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;

- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1687 et seq).

D. Environmental Justice Activity

In 1994, Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued. EO 12898 emphasizes the responsibility to make environmental justice a goal by identifying and addressing the effects of programs, policies and activities on minority and low-income populations. The Sun Corridor MPO accomplishes this by considering these populations in its transportation planning process to ensure equitable and safe projects within its community.

Title VI of the Civil Rights Act of 1964 requires outreach to underserved groups.

"No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." A further 1994 Presidential directive dictates, "Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." *Executive Order 12898*

The Sun Corridor MPO will consider environmental justice through planning activity according to Federal legislation noted above. Furthermore, in order to involve and assist the underrepresented and underserved, the MPO will adhere to the Moving Ahead for Progress in the 21st Century Act or MAP-21 and the Fixing America Surface Transportation Act or FAST, within the transportation planning process. The Sun Corridor MPO will make every effort to hold public meetings in facilities that are Americans with Disabilities Act (ADA) compliant; and, arrange for reasonable accessibility and accommodation to persons with disabilities. Further, to provide equally effective communication, the Sun Corridor MPO will make due preparation for persons requiring assistance, such as the hearing or visually impaired, upon request.

The Sun Corridor MPO will assist persons with limited English proficiency to participate in the transportation planning process. Staff will provide Spanish translators and document translation, where feasible and upon request. Elderly persons or non-vehicle households who are unable to attend meetings may request information from the Sun Corridor MPO office and have the requested materials delivered to their residence. Sun Corridor MPO staff, coordinating availability, is willing to go speak to groups in an effort to eliminate participation barriers and involve citizens in the transportation process.

E. Public Participation Process

The Sun Corridor MPO recognizes the increasing importance of involving the public as they plan, organize and implement transportation projects. Engaging interested parties generally results in a more effective project overall. Taking time at the beginning to communicate with potentially affected interests, carefully explaining the proposal, and gathering input, can enhance the project and theoretically reduce the time and effort for implementation.

The goals of this public involvement are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process.
- The issues and concerns of residents are given consideration in the selection of transportation investments.
- Transportation investments do not disproportionately burden any population with adverse impacts.

The Sun Corridor MPO operates under a comprehensive Public Participation Plan (PPP). The Plan explains the agency goals for public participation, governing structure, and composition of boards, procedures for board meetings, program areas, interagency coordination, and specific procedures for public participation in the planning process, public engagement and notification methods. The full plan is available at www.scmpo.org.

Commitment to Public Involvement

The Public Participation Plan (PPP) contains background material, guidelines, and commitments that the Sun Corridor MPO is undertaking to incorporate an effective public process into future plans, projects, and programs. Specifically the Sun Corridor MPO is committed to:

- Inclusive and meaningful public involvement.
- Open and honest communications with all individuals and entities.
- Timely public notice.
- Full public access to information and key decisions.
- Creating a sense of shared responsibility and ownership for regional transportation/congestion problems and a shared sense of pride in the development of solutions to those problems.

-
- Helping form partnerships between member entities, and the private and public sectors to plan and implement transportation/congestion solutions.
 - Establishing policies and prioritizing needs based on valid data and using objective, fair and consistent processes.
 - Providing information and gathering input so that decision makers will be able to make informed decisions.

Public Meetings

The Sun Corridor MPO's Executive Board meets the 2nd Tuesday of every other month. Their Technical Advisory Committee meets the 4th Thursday of every other month. The upcoming Annual Meeting Schedule is published on the Sun Corridor MPO website in December of each year. Agendas for each meeting are posted at Sun Corridor MPO office, 211 N. Florence St., Ste. 103, Casa Grande, Arizona and online at: www.scmpo.org a minimum of 5 days in advance of each meeting.

The following statement is conveyed on each meeting schedule as well as on each agenda, *"Anyone needing accommodations, please contact Irene Higgs at (520) 705-5134 48 hours prior to the meeting.* To date, no request has been made.

Public participation is promoted at each meeting and our agendas give opportunity to call upon the public to make comment on any unrelated agenda topic as well as during discussion on an agenda topic.

In the event of a cancellation, notice will be posted on web site a minimum of 48 hours in advance as well as email notification sent to regular meeting participants.

Notice to the Public

The following "Notice to the Public" is posted in the Sun Corridor MPO office and on the on the Sun Corridor MPO website (www.scmpo.org).

SUN CORRIDOR METROPOLITAN PLANNING ORGANIZATION'S TITLE VI NOTICE TO THE PUBLIC

The Sun Corridor Metropolitan Planning Organization (Sun Corridor MPO) hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related authorities in all of its programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, national origin, age, disability, limited English proficiency or low-income be excluded from the participation in, be denied the

benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which Sun Corridor MPO receives Federal financial assistance.

Any person, who believes his/her Title VI protection has been violated, may file a complaint. Any such complaint must be in writing and filed with the Sun Corridor MPO, Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the Sun Corridor MPO Office or website.

AVISO PUBLICO DE LA ORGANIZACION DE PLANIFICACION METROPOLITANA DEL CORREDOR DEL SOL SOBRE EL TITULO VI

La Organización de Planificación Metropolitana del Corredor del Sol da aviso al publico que es la norma de esta agencia asegurar cumplimiento total con el Título VI de la Ley de los Derechos Civiles de 1964, la Ley de Restauración de 1987, y autoridades relacionadas en todos sus programas y actividades. El Título VI requiere que ninguna persona sea discriminada por razón de raza, color, país de origen, sexo, edad, discapacidad, bajos recursos o reducida destreza en el idioma ingles; sea negada participar, servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

Cualquier persona que crea que se ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito con la Organización de Planificación Metropolitana del Corredor del Sol dentro de los ciento ochenta (180) días de la fecha en que se alega que la discriminación ocurrió. Para recibir formularios de reclamo por favor póngase en contacto con la oficina La Organización de Planificación Metropolitana del Corredor del Sol.

F. 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, sex, age, disability, low-income and limited English proficiency or (b) noncompliance with Title VI rules or guidelines adopted thereunder. The complaint form can be found at the Sun Corridor MPO website at: <http://scmpo.org/title-vi/>

The Arizona Department of Transportation (ADOT) has the principal responsibility for processing, investigating, and resolving complaints arising as a result of operations related to federal highway aid projects of its sub-recipients including the Sun Corridor MPO. Sun Corridor MPO will be responsible for processing, investigating and resolving complaints of discrimination by its member agencies. Complaints will be filed through the Sun Corridor MPO, in writing to:

**Irene Higgs, Executive Director – Title VI Program Coordinator
Sun Corridor Metropolitan Planning Organization
211 N Florence St., #103
Casa Grande, AZ 85221**

Complaints against the Sun Corridor MPO must be filed in writing to:

**ADOT Civil Rights Office
206 S. 17th Ave., Room 183
MD155A
Phoenix, AZ 85007**

Complaints received by the Sun Corridor MPO will be forwarded to the ADOT 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 49 CFR 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 Program Manager or a liaison will assist the complainant with documenting the issues if necessary.
- b. Present 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 (ies) 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 the Civil Rights Office (CRO) 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 the CRO for processing.

f. Within 45 calendar days of the acceptance of the complaint, the ADOT investigator will prepare a draft investigative report for the review of the ADOT CRO Deputy Administrator. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

g. ADOT's final investigative report with the preliminary findings and a copy of the complaint will be forwarded by certified mail to either 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.

G. Limited English Proficiency (LEP)

Limited English Proficiency (LEP) is a term used to describe individuals who are not proficient in the English language. Arizona's diverse population makes it critically important the Sun Corridor MPO be innovative and proactive in engaging individuals from different cultures, backgrounds and businesses in planning, project development and other program areas.

Laws and Policy

Executive Order (EO) 13166 - *Improving Access to Services for Persons with Limited English Proficiency* is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are LEP. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

The following matrix illustrates legal and policy considerations:

Title VI of the Civil Rights Act of 1964

Federal law
Enacted July 2, 1964
Considers all persons
Contains monitoring and oversight
Compliance review requirements
Factor criteria is required, no numerical
or percentage thresholds

**Limited English Proficiency
Executive Order 13166**

Federal policy
Signed August 11, 2000
Considers eligible population
Contains monitoring and oversight
Requirements
Factor criteria is required, no
numerical or percentage thresholds

Program Responsibility

Executive Order (EO) 13166 directs recipients of Federal financial assistance to take reasonable steps to provide limited English proficient individuals with meaningful access to their programs, activities and services.

- *Notify LEP customers of the availability of language assistance services*
LEP persons have the right to language assistance at no cost to them in their spoken language. Language identification cards or posting signs in public areas are methods that can be used to provide notice of the service.
- *Translation of vital documents in languages other than English*
It is appropriate to have written materials that have been historically provided in English to applicants, customers and the general public translated into languages that are regularly encountered. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Written materials include electronic documents and web-sites. The Sun Corridor MPO with indicate on its web site and newspaper publications that translation can be provided, with appropriate notice.

Vital Documents are documents that convey information that critically affects the ability of the recipient/customer to make decisions about his/or her participation in the program or activity. Examples of vital documents include, but are not limited to applications, public notices, consent forms, letters containing important information regarding participation in a program, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, notices advising of the availability of language assistance and outreach and community

education materials. It is recommended that divisions/programs develop criteria for deciding which documents are vital thereby subject to translation.

Translating documents for LEP to a fourth (4th) grade literacy level ensures the targeted audience understands the information. Community based organizations or focus groups can assist with testing translations for language and literacy level appropriateness.

The Department of Transportation Policy Guidelines give recipients of federal funds substantial flexibility in determining what language assistance is appropriate based upon a local assessment. Due to current financial constraints, translation of large plan documents and maps are considered not warranted at this time. The Sun Corridor MPO will provide translation services, if requested, with 10-days' notice prior to when the services are needed.

Sun Corridor MPO LEP Four Factor Analysis

Persons with Limited English Proficiency (LEP)	Estimate	% of Persons 5 Yrs. & Under	% of Persons 5 Yrs. & Over With LEP
Total Persons 5 years & Over	100,163	100.0%	---
English Speaking Only	70,513	70.4%	---
Limited English Proficiency	8,794	8.8%	100.0%
Spanish with LEP	7,679	7.7%	87.3%
Other Indo-European languages with LEP	228	0.2%	2.6%
Asian & Pacific Island languages with LEP	524	0.5%	6.0%
Other Languages with LEP	363	0.4%	4.1%

Source: U.S. Census Bureau, 2010-2014 American Community Survey (ACS) 5-year estimates
ACS data are based on a sample and are subject to sampling variability.

a Limited English Proficient (LEP) persons refers to persons age 5 years and over for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the Census that they speak English less than very well, not well, or not at all

Section Five of the US Department of Transportation guidance on LEP requires a four-factor analysis to determine the need for translation services in order to ensure LEP populations are able to receive information about and can participate in the planning process in the language they best understand.

Based on the four—factor analysis, the Sun Corridor MPO will continue to provide public notices in English and Spanish. Translation and interpretation services will be

provided through public online translation sites, bilingual community members and, if not cost prohibit and funds permit, through a language interpretation and translation service. The goal of the Sun Corridor MPO is to engage all community members in the planning process.

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

According to the U.S. Census Bureau, 2010-2014, American Community Survey five year estimates, 8.8% of the Sun Corridor MPO area population is considered to be Limited English Proficient. This equates to 8,794 individuals or 8.8% of the population five years of age or older who report speaking English less than “very well”. The predominate language spoken by these individuals is Spanish. Under the Department of Justice’s (DOJ) Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than “very well”.

Factor 2: The Frequency in which LEP Persons Encounter Sun Corridor MPO Programs

Some government offices provide materials in English and Spanish but, because the general public comes in contact with the Sun Corridor MPO on an infrequent basis, only public notices and certain vital materials are available in both English and Spanish.

Factor 3: The Importance of Services Provided by Sun Corridor MPO Programs

Transportation planning is an important facet of the community and affects all residents. All residents are encouraged to participate in public meetings.

Factor 4: Available resources, including language assistance services varying from limited to wide ranging with varying costs.

Due to fiscal constraints and limited resources and small staff, interpretation and translation services are not available without advance notice; however, public notices are available in English and Spanish.

Program Areas

- Long Range Transportation Plan (2040 Plan)
- Transportation Improvement Program (TIP)

- Public Involvement Plan (PIP)
- Coordinated Public Transit-Human Services Transportation Plan
- Unified Planning Work Program

All persons living, working, conducting business and visiting the region are beneficiaries of the planning, coordination, and construction activities of the Sun Corridor MPO. The Sun Corridor MPO does not construct projects; albeit, this activity is accorded to member agencies. The safe movement of goods and people is supported by providing and maintaining a transportation network and facilities.

The Title VI Coordinator provides oversight to the program areas through contract reviews and personal interaction in an effort to ensure their compliance with Title VI and other nondiscrimination related authorities.

H. Population and Demographic Profile

2010 Census		
	SCMPO MPO Area	% of Total
Total Population	106,485	100%
White	48,619	45.7%
Hispanic/Latino	44,727	42.0%
African American/Black	5,295	5.0%
Asian	1,758	1.7%
Am. Indian/Alaskan Native	3,187	3.0%
Native Hawaiian other Pacific Islander	1,046	1.0%
Other Races	148	0.1%
2 or More Races	1,705	1.6%

Source: U.S. Census Bureau, 2010 Census - Demographic data obtained from the Census Bureau is analyzed and will be used to ensure minority, disabled and low income populations are considered in the planning process.

2010-2014 Area Estimates Population By Race and Ethnicity				
	Casa Grande	Coolidge	Eloy	Pinal County
Population	50,316	12,058	17,062	375,770
Hispanic/Latino	19,308	4,558	11,315	106,977
White	40,040	10,043	11,643	272,013
African American/Black	2,553	775	1,349	17,215
Asian	1,453	141	500	6,492
Am. Indian/Alaskan Native	1,711	769	526	20,949
Native Hawaiian other Pacific Islander	0	0	378	1,565
Other Ethnicities	4,434	767	3,050	43,213

2 or More Races	1,358	269	165	14,323
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Source: U.S. Census Bureau, ALRIS, American Fact Finder - Demographic data obtained from the Census Bureau is analyzed and will be used to ensure minority, disabled and low income populations are considered in the planning process.

2010 – 2014 Estimates						
Category	Population and Households		Census Tracts ^g			
	Total	Percent	Number of tracts >= MPO Percentage ^d	% Tracts	Affected ^e Population	% of Affected Population Captured in Census Tracts
Population Base (Defined Census geography)	106,485	100.0%	23	100%	-----	-----
Minority ^a	57,866	53.3%	9	39.1%	29,226	50.5%
Age 60+ ^a	20,345	19.1%	11	47.8%	11,442	56.2%
Age 65+ ^a	14,239	13.4%	10	43.5%	8,273	58.1%
Age 75+ ^a	5,353	5.0%	12	52.2%	3,580	66.9%
Below Poverty Level ^b	21,137	21.2%	11	47.8%	14,177	67.1%
Population with a disability ^c	12,994	12.9%	10	43.5%	7,098	54.6%
Limited English Proficient (LEP) Persons ^f	8,794	8.8%	16	69.6%	7,644	86.9%

Sources: U.S. Census Bureau, 2010-2014 American Community Survey (ACS) 5-Year estimates and 2010 Decennial Census ACS data are based on a sample and are subject to sampling variability

^a Minority includes total population less White (Non-Hispanic). Data for minority and population groups by age are from 2010 Census data.

^b Percent of the population for whom poverty status is determined does not include institutionalized persons or persons under 5 years of age. Total population in the Census defined MPO area for whom poverty status is determined is 99,671. Data from 2014 ACS 5-Year estimates (Table B17001)

^c Disability status from the 2014 ACS 5-year estimates. All percentages are based on Census Tracts that match as close as possible to the MPO area, see note 'g'. Disability status is determined for the civilian noninstitutionalized population based on six types of difficulty: hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty. (Table B18101)

^d For Limited English Proficient (LEP) persons, the Federal guidance (Federal Transit Administration Circular 4702.1B) notes that DOT has adopted the DOJ's Safe Harbor Provision. This Provision

stipulates that the targeted minimum number of recipients regarding the translation of written materials for LEP populations is five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served. Thus for determining the number of affected Census Tracts and affected population, 5% is used as the guideline rather than the MPO percentage.

e Affected population is the total of people that fall into the specified category for all Census tracts that have greater than or equal to the percentage for (as defined by the Census geography, see note h the MPO area) or as designated for LEP populations (see note e).

f The guidance for Limited English Proficiency (LEP) for DOT recipients refers to persons age 5 years and over who speak English less than "very well." See http://www.lep.gov/guidance/guidance_Fed_Guidance.html Data from 2014 ACS 5-Year estimates (Table B16005). 2014 estimate of total persons age 5 years and over for the defined Census geography is 100,163.

f The guidance for Limited English Proficiency (LEP) for DOT recipients refers to persons age 5 years and over who speak English less than "very well." See http://www.lep.gov/guidance/guidance_Fed_Guidance.html Data from 2014 ACS 5-Year estimates (Table B16005). 2014 estimate of total persons age 5 years and over for the defined Census geography is 51,366.

g The Census Tracts used in this analysis include the best match using full Census Tracts where the majority of the population or the tract centroid is within the MPO boundary. The base numbers for all values in this table are for this Census-based defined area.

I. Public Participation Process – Public Participation Plan (PPP)

The Sun Corridor MPO operates under a comprehensive Public Participation Plan (PPP). The Plan explains the agency goals for public participation, governing structure, composition of boards, procedures for board meetings, program areas, interagency coordination, specific procedures for public participation in the planning process, public engagement and notification methods. The full plan is available at www.scmpo.org.

In an effort to keep the Title VI Plan a reasonable size, the section of the PPP specifically relevant to Title VI is included below.

Excerpts from the Public Participation Plan

Public participation implies an open process. This means that anyone who is potentially affected, or is just interested in the process, is welcome to participate. Some of the reasons for encouraging this openness are:

1. Project leaders may gain new information;
2. Participants, who want a project to be completed, can provide additional resources in the form of assistance, goods, or services;
3. Public participation can be a forum for dispute resolution;
4. Progress can be made and implementation occur because;
 - The project itself will be better designed with public input;
 - The community better understands what the project is about;
5. Input can be a warning mechanism for potential problems.
6. Participant comments help the project leaders understand areas where additional people may have concerns or misunderstandings. This can be used to provide better information to others who are not participating.

The goals of the Sun Corridor MPO public participation plan are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process.
- The issues and concerns of residents are given consideration in the selection of transportation investments.
- Transportation investments do not disproportionately burden any population with adverse impacts.

The Sun Corridor MPO PPP outlines the importance of, and specific guidelines for, involving community members, organizations, governments, transportation professionals and others in ongoing and future Sun Corridor MPO projects, plans and programs. Included is information about the value of public participation, how it will be accomplished, and what will be done with the results.

The PPP contains background material, guidelines, and commitments that the Sun Corridor MPO is undertaking to incorporate an effective public process into future plans, projects, and programs. Specifically Sun Corridor MPO is committed to:

- Inclusive and meaningful public involvement.

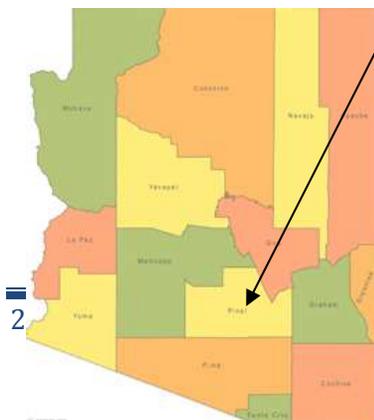
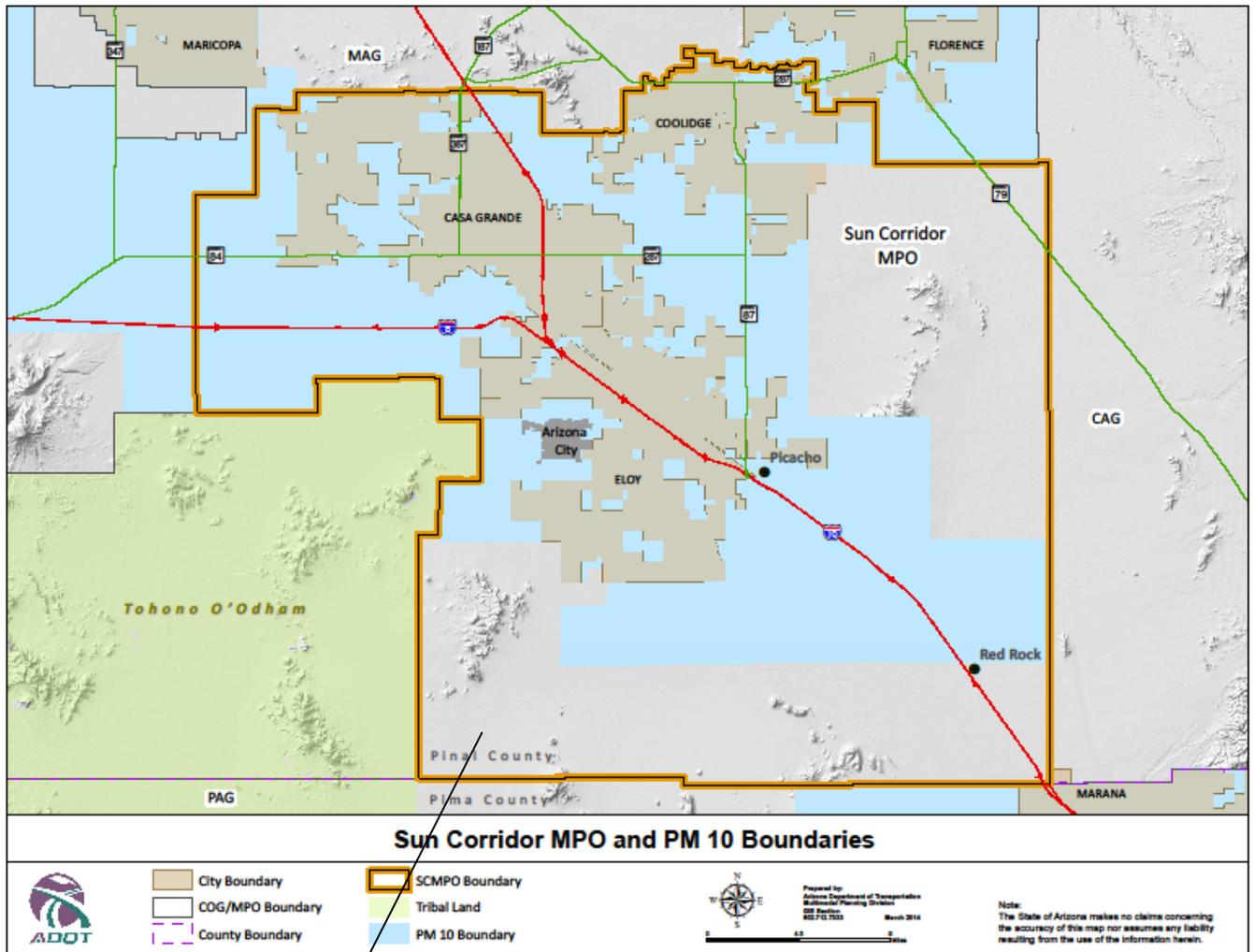
-
- Open and honest communications with all individuals and entities.
 - Timely public notice.
 - Full public access to information and key decisions.
 - Creating a sense of shared responsibility and ownership for regional transportation/congestion problems and a shared sense of pride in the development of solutions to those problems.
 - Helping form partnerships between member entities, and the private and public sectors to plan and implement transportation/congestion solutions.
 - Establishing policies and prioritizing needs based on valid data and using objective, fair and consistent processes.
 - Providing information and gathering input so that decision makers will be able to make informed decisions.

The Sun Corridor MPO is committed to providing the public 30 – calendar days to review the following:

1. Regional Transportation Plan (RTP) – when amended or updates are performed,
2. Transportation Improvement Program (TIP) Projects – when any changes or updates are prepared; and,
3. Public Participation Plan (PPP) – when major changes are made to the Plan.

The above documents are available on the Sun Corridor MPO web site www.scmpo.org or at the Sun Corridor MPO location, 211 N. Florence St., Ste. 103, Casa Grande, AZ. A notice shall be placed on the Sun Corridor MPO web site and publicized in the Casa Grande Tri-Valley and the Arizona City Independent inviting public comment when the documents are being amended.

J. Sun Corridor Regional Boundaries



The Sun Corridor MPO provides transportation planning services to the cities of Casa Grande, Coolidge, Eloy, and the small urban and rural portions of Pinal County.

It encompasses 1,115 square miles, and has an estimated population of 118,503.

K. Sun Corridor MPO's Organization and Planning Administration

Sun Corridor MPO's transportation planning area covers 1,155 square miles within Pinal County. Within the Sun Corridor MPO region, there are three incorporated communities, unincorporated rural Pinal County areas, and two Native American Tribes (who are not members of the Sun Corridor MPO).

Sun Corridor MPO is charged with providing technical assistance to all the entities within the region, for transportation planning, project management, transit programs and activities, and other related programs.

a. General Organization

The Sun Corridor MPO was developed in 2013, and is dedicated to serving its local jurisdictions, within the cities of Casa Grande, Coolidge, Eloy and the small urban and rural portions of Pinal County. Federal regulations require that an MPO be designated to carry out a comprehensive, continuing, and coordinated transportation planning process for urbanized areas with a population of 50,000 or more. The City of Casa Grande is the fiscal and administrative agent for the Sun Corridor MPO.

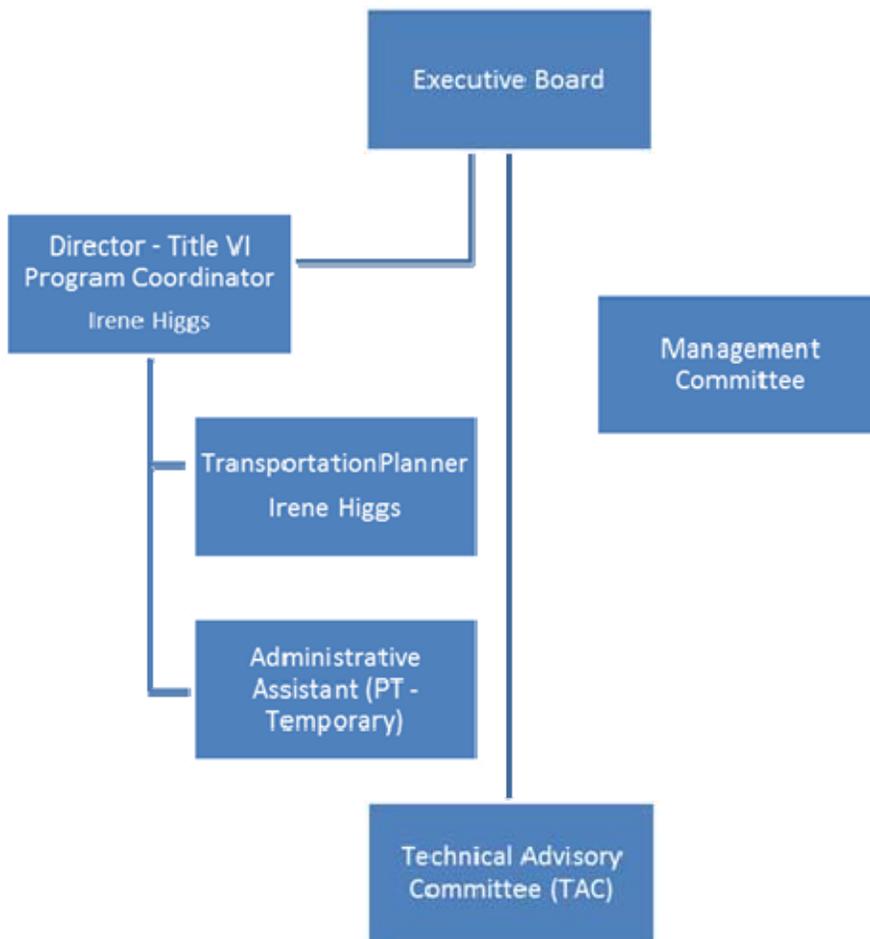
b. Sun Corridor MPO Title VI Program Coordination and Administration

The chairperson of the Board for the Sun Corridor MPO is responsible for ensuring the implementation of the Sun Corridor MPO Title VI program. The Executive Director of the Sun Corridor MPO, on behalf of the Executive Board, is responsible for the overall management of the Title VI program, and serves as the Title VI Program Coordinator.

Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under duties of the Sun Corridor MPO Executive Director which includes, but is not limited to, activities such as; project reporting, data collection, technical assistance and training. Civil Rights training is provided to the Planning Manager who ensures staff understand Title VI and can assist with complaints. Disadvantaged populations, to include individuals with Limited English

Proficiency (LEP), are provided equal opportunity to participate in transportation planning through the Sun Corridor MPO Transportation Advisory Committee (TAC) member in their community. The day-to-day administration of the transportation programs lies with the Sun Corridor MPO Executive Director, located in Casa Grande Arizona.

Sun Corridor MPO Organizational Chart



c. Sun Corridor MPO Title VI Program Coordinator Contact Information

Irene Higgs, Executive Director/Title VI Coordinator
520-705-5143
ihiggs@scmpo.org
www.scmpo.org

Sun Corridor MPO Membership

a. Executive Board

The member agencies of the Sun Corridor MPO are represented on the **Executive Board** by elected officials, and the resident ADOT Transportation Board Member. It is the function of the Executive Board to act as a policy body, coordinating transportation planning and related implementation activities within the Sun Corridor MPO transportation region. The Board must approve all agreements and contracts, and the Chairman must sign all appropriate documents related to contracts and agreements. The Executive Board consists of elected officials from the below communities.

Sun Corridor MPO Executive Board Representative
City of Casa Grande – One Member
City of Coolidge – One Member
City of Eloy – One Member
Pinal County District 3 – One Member
ADOT Board Member – One Member

a. Technical Advisory Committee

The Sun Corridor MPO **Transportation Advisory Committee (TAC)** is the technical advisory committee to the Executive Board. The voting member TAC is comprised of an appointed representative from each public works department of each member entity, and an ADOT representative. The committee has the authority, and primary responsibility to conduct technical reviews regarding all work activities of the Unified Planning Work Program; to recommend project awards; and to advise the Executive Board on appropriate actions to be taken for the overall planning direction of the region.

Sun Corridor MPO TAC Representative
Casa Grande – One Member
Coolidge – One Member
Eloy – One Member
Pinal County – One Member
ADOT – One Member

b. Race and Gender Statistical for Sun Corridor MPO TAC:

Committees	RACE			GENDER	
	White	Hispanic	Am. Indian	Male	Female
Transportation Advisory Committee	4	1		2	3

L. Investigations, Lawsuits and Complaints

No investigations, lawsuits or complaints have been filed against the Sun Corridor MPO or its member agencies during the past three years. A copy of the Complaint Log is included as an attachment.

M. Compliance and Enforcement

a. Compliance

Sun Corridor MPO is committed to Title VI and related authorities and will make every effort to identify, address and eliminate discrimination if it is found to exist in any of its programs and activities.

b. Subrecipient Review Procedures

The Title VI Coordinator is responsible for reviewing subrecipients for Title VI Compliance through review of training, onsite visits and personal interviews of staff. The Title VI Coordinator will also ensure its subrecipients receive Title VI training. At the current time, the Sun Corridor MPO does not have any subrecipients.

N. Exhibit “A” – Title VI Complaint Log

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)				

Include basis of complaint.

Report to be Submitted Annually to ADOT Title VI Department