



**Sun Corridor Metropolitan Planning Organization**  
211 North Florence Street, Suite 103  
Casa Grande, AZ 85122  
[www.scmpo.org](http://www.scmpo.org)

# 2026

## **TITLE VI and LEP IMPLEMENTATION PLAN**

### **Nondiscrimination in Federally Assisted Programs**

Endorsed and Approved By:  
Sun Corridor Metropolitan Planning Organization  
Executive Board  
On: July 8, 2025

Endorsed and Approved By:  
Sun Corridor Metropolitan Planning Organization  
Technical Advisory Committee  
On: June 5, 2025

As prepared by the  
Sun Corridor Metropolitan Planning Organization

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**En Español:**

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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## 1. Introduction

The **Sun Corridor Metropolitan Planning Organization (MPO)** hereby agrees that as a condition to receiving any Federal financial assistance provided by the U.S. Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, as amended, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), the Civil Rights Restoration Act of 1987 (Public Law 100-259) and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the U.S. Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, 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 the U.S. Department of Transportation, including the Federal Transit Administration (FTA), Federal Highway Administration (FHWA) and **HEREBY GIVES ASSURANCE THAT** it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a)(1) of the Regulations. The **SUBRECIPIENT** shall also incorporate and comply with the terms and conditions established in Appendix A and E.

## Title VI and Americans with Disabilities (ADA) Nondiscrimination Policy Statement

The Sun Corridor MPO is committed to ensuring that no person is discriminated against on the grounds of race, color, national origin, or disability as provided by Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration Act of 1987, Federal-Aid Highway Act of 1973, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (ADA),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 8, 2025

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

## 2. Title VI Assurances

The Sun Corridor Metropolitan Planning Organization (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);

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 "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 (MPO), in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 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.
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 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 transference 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** 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, 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** 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.

A handwritten signature in blue ink that reads "Irene Higgs".

**By:** \_\_\_\_\_ **Date:** July 8, 2025

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

## APPENDIX A

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, 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.
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 or the Federal Highway Administration 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 or the Federal Highway Administration, 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, 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 respect to any subcontract or procurement as the Recipient or the Federal Highway Administration 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 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

### CLAUSES 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 (MPO)** 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 MPO** 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 MPO** 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 MPO** 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 (MPO)** 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 MPO** 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 MPO** will there upon revert to and vest in and become the absolute property of **Sun Corridor MPO** 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

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 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).

### **3. Notice to the Public**

The following “Notice to the Public” is posted in the office of the Executive Director/Title VI Coordinator, on the “Public Notice” bulletin board that is located in the hallway of the MPO Offices and on the Sun Corridor MPO website ([www.scmpo.org](http://www.scmpo.org)).

#### ***SUN CORRIDOR METROPOLITAN PLANNING ORGANIZATION’S TITLE VI/AMERICAN WITH DISABILITIES ACT 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, Title II of the Americans Disabilities Act of 1990 (ADA), and related authorities in all of its programs and activities.

The Sun Corridor MPO’s Title VI and ADA Programs requires that no person shall, on the grounds of race, color, national origin, or disability, 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 or ADA rights have 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 PÚBLICO DE LA ORGANIZACIÓN DE PLANIFICACIÓN SUN CORRIDOR METROPOLITAN PLANNING ORGANIZATION SOBRE EL TITULO VI / DECRETO DE AMERICANOS CON DISCAPACIDADES***

La organización de planificación metropolitana Sun Corridor Metropolitan Planning Organization (Sun Corridor MPO) por este medio hace un aviso público de que la norma de la Agencia es la de asegurar el cumplimiento total con el Título VI del Decreto de los Derechos Civiles de 1964, con el Decreto de Restauración de los Derechos Civiles de 1987, con el Título II del Decreto de Americanos con Discapacidades de 1990 (ADA por sus siglas en inglés), y con las autoridades relacionadas en todos sus programas y actividades.

Los programas de Sun Corridor MPO bajo el Título VI y el decreto ADA requieren que ninguna persona deberá, basándose en su raza, color, origen nacional, o discapacidad, ser excluida de su participación en, denegada de los beneficios de, o de otra forma verse sujeta a discriminación bajo cualquier programa de Carreteras con Asistencia Federal u otra actividad para la cual Sun Corridor MPO reciba asistencia financiera federal.

Cualquier persona que crea que se han violado sus derechos bajo el Título VI o el decreto ADA, puede registrar una queja. Cualquier dicha queja debe hacerse por escrito y registrarse con la Coordinadora del Título VI de la organización Sun Corridor MPO dentro de ciento ochenta (180) días después de la fecha en la que haya ocurrido el supuesto evento discriminatorio. Las Formas de Quejas se pueden obtener en la oficina o el sitio web de la organización Sun Corridor.

Irene Higgs, Director - Title VI Coordinator 520.705.5143 <a href="mailto:ihiggs@scmpo.org">ihiggs@scmpo.org</a>	211 N. Florence Street, #103 Casa Grande, AZ 85122 <a href="http://www.scmpo.org">www.scmpo.org</a>
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## 4. Non-Discrimination Complaint Procedures

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 as they relate to any Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) funded program or activity administered by the Sun Corridor MPO, its subrecipients, consultants and contractors may file a complaint. The complaint must be (a) unequal treatment because of race, color, or national origin or (b) noncompliance with Title VI rules or guidelines adopted thereunder. The complaint form in both English and Spanish can be found at the Sun Corridor MPO website at: <http://scmpo.org/title-vi/> or as an attachment (Exhibit "A") of this document. *If information is needed in another language, please contact the Sun Corridor MPO at (520)-705-5143. Si se necesita información en Español, por favor comuníquese con la Oficina de Sun Corridor MPO al (520) 705-5143.*

Irene Higgs, Executive Director – Title VI Program Coordinator  
Sun Corridor Metropolitan Planning Organization 211 N Florence St., #103  
Casa Grande, AZ 85221  
Phone: 520.705.5143

### FHWA Title VI Complaint Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 as they relate to any FHWA program or activity administered by the Sun Corridor MPO, its subrecipients, consultants and contractors. In addition to these procedures, complainants reserve the right to file formal complaints with other state or federal agencies or take legal action for complaints alleging discrimination.

#### **Required procedures for FHWA Title VI Complaints filed against the Sun Corridor MPO, the Sun Corridor MPO's subrecipients, contractors or consultants:**

1. Any person, specific class of persons or entity that believes they have been subjected to discrimination on an FHWA-related activity or program as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, can file a formal complaint with the Sun Corridor MPO. A copy of the Complaint Form may be accessed electronically at: <http://scmpo.org/title-vi/>
2. The complaint must be filed within 180 days of the alleged discrimination and include the date the alleged discrimination became known to the complainant or the last date of the incident.
3. Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. However, the complainant may call the Sun Corridor MPO and provide the

allegations by telephone for transcription. Once transcribed the Sun Corridor MPO will send the written complaint to the complainant for correction and signature.

4. A complaint should contain at least the following information:
  - a. A written explanation of what has happened;
  - b. A way to contact the complainant;
  - c. The basis of the complaint (e.g., race, color, national origin);
  - d. The identification of a specific person/people and the respondent (e.g., Sun Corridor MPO/organization) alleged to have discriminated;
  - e. Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal Highway Administration financial assistance; and is a consultant, contractor or subrecipient of the Sun Corridor MPO and
  - f. The date(s) of the alleged discriminatory act(s).
5. Upon receipt of a complaint, the Sun Corridor MPO will forward all FHWA Title VI complaints to the Arizona Department of Transportation (ADOT) External Civil Rights (ECR) within 72 hours.
6. ADOT ECR will forward all FHWA Title VI complaints to the FHWA Division Office.
7. All Title VI complaints received by the FHWA Division Office will be forwarded to the FHWA Office of Civil Rights for processing and potential investigation.
8. If the FHWA Office of Civil Rights determines a Title VI complaint against a subrecipient can be investigated by ADOT ECR, the FHWA Office of Civil Rights may delegate the task of investigating the complaint to ADOT ECR. ADOT ECR will conduct the investigation and forward the Report of Investigation to the FHWA Office of Civil Rights for review and final disposition.
9. The disposition of all Title VI complaints will be undertaken by the FHWA Office of Civil Rights, through either (1) informal resolution or (2) issuance of a Letter of Finding of compliance or noncompliance with Title VI. A copy of the Letter of Finding will be sent to the FHWA Division Office.
10. The complainant may also file a discrimination-related complaint on an FHWA program or activity directly with ADOT or with the Federal Highway Administration by contacting the agencies at:

ADOT External Civil Rights Office 1801 W. Jefferson St. Suite 101 Phoenix, AZ 85007 602.712.8946 Email: <a href="mailto:CivilRightsOffice@azdot.gov">CivilRightsOffice@azdot.gov</a>	Federal Highway Administration U.S. Department of Transportation Office of Civil Rights 1200 New Jersey Avenue, SE 8th Floor E81-105 Washington, DC 20590 Email: <a href="mailto:CivilRights.FHWA@dot.gov">CivilRights.FHWA@dot.gov</a> 202-366-0693 202-366-1599 FAX
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## FTA Title VI Complaint Procedures

1. Any person, specific class of persons or entity that believes they have been subjected to discrimination on an FTA-related activity or program as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, can file a formal complaint with the Sun Corridor MPO. A copy of the Complaint Form may be accessed electronically at: <http://scmpo.org/title-vi/>
2. The complaint must be filed within 180 days of the alleged discrimination and include the date the alleged discrimination became known to the complainant or the last date of the incident.
3. Complaints should be in writing, signed, and may be filed by mail, in person, or e-mail. However, the complainant may call the Sun Corridor MPO and provide the allegations by telephone for transcription. Once transcribed the Sun Corridor MPO will send the written complaint to the complainant for correction and signature.
4. A complaint should contain at least the following information:
  - a. A written explanation of what has happened;
  - b. A way to contact the complainant;
  - c. The basis of the complaint (e.g., race, color, national origin);
  - d. The identification of a specific person/people and the respondent (e.g., Sun Corridor MPO/organization) alleged to have discriminated;
  - e. Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives FTA financial assistance; and is a consultant, contractor or subrecipient of the Sun Corridor MPO and
  - f. The date(s) of the alleged discriminatory act(s).
5. Upon receipt of a completed complaint, the Sun Corridor MPO will notify Arizona Department of Transportation (ADOT) External Civil Rights Office (ECR) of an FTA Title VI complaint within 72 hours of its receipt.
6. All Title VI complaints received by the Sun Corridor MPO will be reviewed for processing and potential investigation.
7. The complainant will receive a letter of finding stating that final decision.

For FTA funded programs or activities; the complainant may file a discrimination-related complaint directly with the Sun Corridor MPO or with ADOT or with the Federal Transit Administration by contacting the agencies at:

ADOT External Civil Rights Office 1801 W. Jefferson St. Suite 101 Phoenix, AZ 85007 602.712.8946 Email: <a href="mailto:CivilRightsOffice@azdot.gov">CivilRightsOffice@azdot.gov</a>	FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
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*If information is needed in another language, please contact the Sun Corridor MPO at (520)-705-5143. Si se necesita información en Español, por favor comuníquese con la Oficina de Sun Corridor MPO al (520) 705-5143.*

## 5. Limited English Proficiency (LEP)

A Limited English Proficiency (LEP) individual is an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. 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:

<u>Title VI of the Civil Rights Act of 1964</u>	<u>Limited English Proficiency Executive Order 13166</u>
<ul style="list-style-type: none"><li>• Federal law</li><li>• Enacted July 2, 1964</li><li>• Considers all persons</li><li>• Contains monitoring and oversight compliance review requirements</li><li>• Factor criteria is required, no numerical or percentage thresholds</li><li>• Provides protection on the basis of race, color, and national origin. Focuses on eliminating discrimination in federally-funded programs</li><li>• Annual Accomplishments and Upcoming Goals Report to FHWA</li><li>• Provides protection on the bases of race, color, and national origin.</li></ul>	<ul style="list-style-type: none"><li>• Federal policy</li><li>• Signed August 11, 2000</li><li>• Considers eligible population</li><li>• Contains monitoring and oversight requirements</li><li>• Factor criteria is required, no numerical or percentage thresholds</li><li>• Provides protection on the basis of national origin; focuses on providing LEP persons' federally- funded programs with meaningful access to services using factor criteria</li><li>• Annual Accomplishments and Upcoming Goals Report to FHWA</li><li>• Provides protection on the bases of national origin.</li></ul>

The Sun Corridor MPO will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of Sun Corridor MPO is to ensure meaningful communication with LEP patients/clients and their authorized representatives

involving their medical conditions and treatment. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and patients/clients and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

Sun Corridor MPO will conduct a regular review of the language access needs of our population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

### **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 websites. The Sun Corridor MPO will 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/her participation in the program or activity. Classification of a document as “vital,” depends upon the importance of the program, information, encounter, or service involved, and/or the consequence to the LEP community if the information in question is not provided in an accurate or timely manner. 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. The determination of what documents are considered “vital” is left to the discretion of individual components, which are in the best position to evaluate their circumstances, services, and resources.

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**

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.

The Sun Corridor MPO will be responsible for conducting a Four Factor Analysis and ensuring compliance with LEP requirements on a project by project basis. The project study area will be analyzed to determine if a LEP population exist, to ensure public outreach materials are made available to the LEP population.

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, 2018-2022, American Community Survey five year estimates, 9.0% or 9,858 of the Sun Corridor MPO area population is considered to be Limited English Proficient. This equates to 4,550 individuals of the population five years of age or older who report speaking English “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.

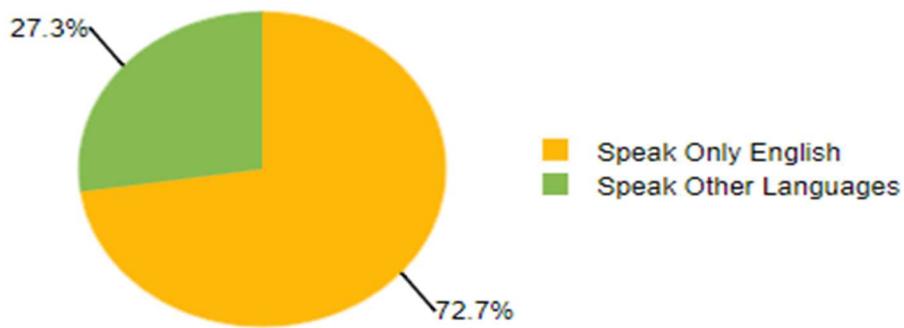
**Factor 4: Available resources, including language assistance services varying from limited to wide ranging with varying costs.**

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.

On an ongoing basis, the Sun Corridor MPO will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, The Sun Corridor MPO will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from member entities and community organizations, etc.

## American Community Survey 2019-2023 5yr Estimates

Ability to Speak English		
Population 5 years and over	119,181	
Name	Estimate	Percent
Speak Only English	82,039	72.7%
Speak Other Languages	30,850	27.3%
Speak English "very well"	21,282	N/A
Persons with Limited English Proficiency (LEP)	9,568	9.0%
Speak English "well"	4,544	N/A
Speak English "not well"	3,2234	N/A
Speak English "not at all"	1,789	N/A



Source: U.S. Census Bureau American Community Survey 2019 – 2023

LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER 2018 - 2022	Pinal County		Casa Grande City		Coolidge		Eloy	
	Estimate	%	Estimate	%	Estimate	%	Estimate	%
Total:	425,204		54,286		14,434		16,212	
<b>Speak only English</b>	343,633	81%	40,448	75%	9,990	69%	10,462	65%
<b>Spanish:</b>	67,564	16%	12,229	23%	4,103	28%	5,154	32%
Speak English "very well"	47,892	11%	8,722	16%	2,995	21%	3,268	20%
Speak English less than "very well"	19,672	5%	3,507	6%	1,108	8%	1,886	12%
<b>French, Haitian, or Cajun:</b>	544	0%	63	0%	0	0%	8	0%
Speak English "very well"	457	0%	38	0%	0	0%	8	0%
Speak English less than "very well"	87	0%	25	0%	0	0%	0	0%
<b>German or other West Germanic languages:</b>	1,095	0%	75	0%	0	0%	31	0%
Speak English "very well"	999	0%	54	0%	0	0%	31	0%
Speak English less than "very well"	96	0%	21	0%	0	0%	0	0%
<b>Russian, Polish, or other Slavic languages:</b>	979	0%	14	0%	45	0%	89	1%
Speak English "very well"	702	0%	14	0%	45	0%	89	1%
Speak English less than "very well"	277	0%	0	0%	0	0%	0	0%
<b>Other Indo-European languages:</b>	1,763	0%	409	1%	90	1%	51	0%
Speak English "very well"	1,054	0%	47	0%	90	1%	51	0%
Speak English less than "very well"	709	0%	362	1%	0	0%	0	0%
<b>Korean:</b>	257	0%	4	0%	0	0%	0	0%
Speak English "very well"	134	0%	4	0%	0	0%	0	0%
Speak English less than "very well"	123	0%	0	0%	0	0%	0	0%
<b>Chinese (incl. Mandarin, Cantonese):</b>	508	0%	5	0%	18	0%	6	0%
Speak English "very well"	336	0%	5	0%	18	0%	6	0%
Speak English less than "very well"	172	0%	0	0%	0	0%	0	0%
<b>Vietnamese:</b>	431	0%	10	0%	0	0%	0	0%
Speak English "very well"	158	0%	0	0%	0	0%	0	0%
Speak English less than "very well"	273	0%	10	0%	0	0%	0	0%
<b>Tagalog (incl. Filipino):</b>	1,638	0%	431	1%	15	0%	31	0%
Speak English "very well"	1,198	0%	329	1%	3	0%	23	0%
Speak English less than "very well"	440	0%	102	0%	12	0%	8	0%
<b>Other Asian and Pacific Island languages:</b>	2,106	0%	311	1%	0	0%	168	1%
Speak English "very well"	1,553	0%	227	0%	0	0%	105	1%
Speak English less than "very well"	553	0%	84	0%	0	0%	63	0%
<b>Arabic:</b>	201	0%	14	0%	0	0%	13	0%
Speak English "very well"	167	0%	14	0%	0	0%	13	0%
Speak English less than "very well"	34	0%	0	0%	0	0%	0	0%
<b>Other and unspecified languages:</b>	4,485	1%	273	1%	173	1%	199	1%
Speak English "very well"	3,836	1%	230	0%	152	1%	146	1%
Speak English less than "very well"	649	0%	43	0%	21	0%	53	0%

Source: U.S Census Bureau, 2019 – 2023 American Community Survey 5-Year Estimates: Extracted from Table C16001

## 7. Program Areas

### Regional Transportation Planning

- Long Range Transportation Plan
- Transportation Improvement Program (TIP)
- Air Quality Conformity
- Planning Studies (e.g. Transit, Safety, etc.)
- Public Participation Plan (PPP)
- Human Services Transportation Coordination Plan

The Title VI Coordinator provides oversight to the program areas. Annually, the Title VI Coordinator will report in the Goals and Accomplishment Report data collected throughout the year and explain the steps for each program area in order to comply with Title VI Program requirements.

The Title VI Coordinator is responsible for overseeing the preparation and execution of all planning study contracts for consultants to ensure Title VI compliance.

FHWA Funded Contracts will be reviewed for the following:

- Include the most recently signed assurances;
- Include subrecipient signed assurances; and
- Ensure the consultant is complying with Title VI Assurances.

The following matrix outlines the program areas, a general description of each program, review procedures, and non-compliance procedures:

Program Area	General Description	Program Review Procedures	Non-Compliance
<b>Regional Transportation Planning:</b> Regional Transportation Plan Transportation Improvement Program Air Quality Conformity Other Planning Studies (e.g. transit, safety, etc.)	<p>The RTP addresses the mobility needs of people of all ages, incomes and abilities. It identifies the desired vision for the region's transportation system in which funding is unconstrained.</p> <p>The fiscally constrained RTP addresses federal requirements for the process of developing, and the content to be included within, a long-range transportation plan. Specifically, it defines transportation elements and services to be provided over the next 20 years based on reasonably expected revenues.</p> <p>Transportation Improvement Program (TIP) identifies all federally funded transportation projects to be completed in the Sun Corridor MPO region over a four-year period.</p> <p>Under the Clean Air Act, SCMPO has responsibilities to ensure its transportation plans and programs support air quality goals and contribute to meeting air quality standards.</p>	<p>All Board and committee meetings are open to the public. Public comment is always included as an agenda item for all Executive Board and Technical Advisory Committee meetings.</p> <p>Self-Identification Surveys in both English and Spanish are made available at each Executive Board and Technical Advisory Committee meeting. The data collected from these surveys allows for the analysis to ensure that all persons have an equal opportunity to benefit from or have access to the activities of the MPO and to avoid any disproportionate impacts from those activities.</p> <p>All planning studies are made available to the public for a minimum of 30-day review and comment period.</p> <p>As part of the public outreach process, surveys are made available to the public either on-line and/or in hard copy to collect a variety of data for planning studies. Statistical data such as race, color, and national origin are captured during these public surveys. The data collected from these surveys allows for the analysis to determine if Title VI neighborhoods are receiving equal benefit and not a disproportionate burden.</p> <p>The Limited English Proficiency (LEP) Four Factor Analyses are conducted on the planning study area to determine if study documents need to be provided in both English and Spanish.</p>	<p>See Section 13. Compliance, Monitoring, and Non-Compliance for details on how the Sun Corridor MPO ensures compliance, monitoring, and handles non-compliance with MPO Staff, subrecipients, and consultants.</p>

Program Area	General Description	Program Review Procedures	Non-Compliance
Public Participation Plan	<p>The purpose of a public participation plan is to ensure a proactive public involvement procedure that allows the public to be involved in all phases of the planning process by providing complete information, timely public notice, opportunities for making comments, full access to key decisions, and early and continuing involvement in developing transportation plans and programs.</p>	<p>The Public Participation Plan is made available to the public for a 45-day comment/review period. Public Notices are made available in both English and Spanish.</p> <p>Individuals who are not able to attend meetings may make a request for the information at Sun Corridor MPO offices for delivery of materials to their homes. Public meetings are held in facilities that are compliant with the Americans with Disabilities Act (ADA); and, arrange for reasonable accessibility and accommodation to persons with disabilities. Further, to provide equally effective communication, Sun Corridor MPO will make due preparation, when appropriate, for persons requiring assistance, such as the hearing or visually impaired, upon request.</p>	<p>See Section 13. Compliance, Monitoring, and Non-Compliance for details on how the Sun Corridor MPO ensures compliance, monitoring, and handles non-compliance with MPO Staff, subrecipients, and consultants.</p>

Program Area	General Description	Program Review Procedures	Non-Compliance
Human Services Transportation Coordination Plan	<p>This plan identifies the transportation needs of individuals with disabilities, older adults and people with low incomes, provide strategies from meeting these needs and prioritize transportation services for funding and implementation.</p>	<p>Demographic information from the US Census is used to provide a better understanding and a more complete picture of the population in the CAG/SCMPO Region, and in particular persons with disabilities, older adults, and low-income individuals and households.</p> <p>Coordination with 5310 and 5311 transit agencies for Title VI outreach during any transit-oriented planning activities. Rely on transit agencies for on-board surveys on ridership demographics. Data collected from the survey determines transit needs/service gaps and to establish priorities.</p> <p>The Plan is made available to the public for a minimum of 30-day review and comment period.</p>	<p>See Section 13. Compliance, Monitoring, and Non-Compliance for details on how the Sun Corridor MPO ensures compliance, monitoring, and handles non-compliance with MPO Staff, subrecipients, and consultants.</p>

## 8. Data Collection and Analysis

The Sun Corridor MPO is required by federal regulations to collect statistical data on the race, color, and national origin of participants in its programs. Data is collected from the U.S. Census Bureau, Executive Board and Technical Advisory Committee meetings, public meetings, planning study surveys, and procurement contracts. Data collection efforts specific to each program area are described on an annual basis in the Sun Corridor MPO Title VI Implementation Plan. Annually, the data collection findings from each program area are reported in the Sun Corridor MPO Goals and Accomplishment Report. The data will be maintained for the purpose of planning projects and programs. Demographic Maps can be viewed as an attachment (Exhibit "B") of this document.

**Executive Board & Technical Advisory Committee Meetings** – Self-Identification Surveys in both English and Spanish are made available at each Executive Board and Technical Advisory Committee meeting. The data collected from these surveys allows for the analysis to ensure that all persons have an equal opportunity to benefit from or have access to the activities of the MPO and to avoid any disproportionate impacts from those activities.

**Public Meetings** - Self-Identification Surveys in both English and Spanish are made available at each Public meeting. Public involvement materials including meeting notices, project fact sheets and/or flyers and other documents are made available in both English and Spanish to ensure LEP requirements are being met. The data collected from the surveys allows for the analysis to determine if Title VI neighborhoods are receiving equal benefit and not a disproportionate burden.

**Planning Studies** – As part of the public outreach process, surveys are made available to the public either on-line and/or in hard copy to collect a variety of data for planning studies. Statistical data such as race, color, and national origin are captured during these surveys. The data collected from these surveys allows for the analysis to determine if Title VI neighborhoods are receiving equal benefit and not a disproportionate burden. The Limited English Proficiency (LEP) Four Factor Analyses are conducted on the planning study area to determine if study documents need to be provided in both English and Spanish.

**Procurement** – AZ UTRACS is utilized to collect race and sex of all bidders and contract awardees, to ensure DBE compliance.

## Sun Corridor Metropolitan Planning Organization Report

Topic	Estimate	Percent
<b>Gender and Age</b>		
<b>Total Population</b>		
	<b>119,181</b>	-
<b>Gender</b>		
Male	63,748	53.5%
Female	55,432	46.5%
<b>Age</b>		
<b>Select Age Groups</b>		
18 years and over	93,292	78.3%
21 years and over	88,753	74.5%
62 years and over	27,899	23.4%
65 years and over	23,616	19.8%
<b>Race and Ethnicity</b>		
<b>Total Population</b>		
	<b>119,181</b>	-
Hispanic	51,678	43.4%
<b>Non-Hispanic</b>		
White, Non-Hispanic	52,046	43.7%
Black, Non-Hispanic	5,285	4.4%
Native American, Non-Hispanic	3,440	2.9%
Asian, Non-Hispanic	1,360	1.1%
Pacific Islander, Non-Hispanic	430	0.4%
Other, Non-Hispanic	399	0.3%
Two or More, Non-Hispanic	4,542	3.8%
Minority	67,134	56.3%
<b>Ability to Speak English</b>		
<b>Population 5 years and over</b>		
	<b>112,889</b>	-
Speak Only English	82,039	72.7%
Speak Other Languages	30,850	27.3%
Speak English "very well"	21,282	-
Persons with Limited English Proficiency (LEP)	9,568	-
Speak English "well"	4,544	-
Speak English "not well"	3,234	-
Speak English "not at all"	1,789	-
<b>Poverty Status in the Past 12 Months</b>		
<b>Persons for whom poverty status is determined</b>		
	<b>112,931</b>	-
Persons with income below poverty level	17,444	15.4%
<b>Poverty Status for Families in the Past 12 Months</b>		
<b>Total Families</b>		
	<b>28,658</b>	-
Families with income below poverty level	3,263	11.4%

Source: United States Census Bureau, American Community Survey 2019-2023 5yr

Casa Grande Report			
Topic	Estimate	Percent	
<b>Gender and Age</b>			
<b>Total Population</b>			
Gender			
Male	29,415	51.1%	
Female	28,175	48.9%	
<b>Age</b>			
<b>Select Age Groups</b>			
18 years and over	44,206	76.8%	
21 years and over	41,954	72.8%	
62 years and over	13,499	23.4%	
65 years and over	11,693	20.3%	
<b>Race and Ethnicity</b>			
<b>Total Population</b>			
Hispanic	24,839	43.1%	
<b>Non-Hispanic</b>			
White, Non-Hispanic	24,980	43.4%	
Black, Non-Hispanic	2,569	4.5%	
Native American, Non-Hispanic	1,310	2.3%	
Asian, Non-Hispanic	970	1.7%	
Pacific Islander, Non-Hispanic	146	0.3%	
Other, Non-Hispanic	213	0.4%	
Two or More, Non-Hispanic	2,563	4.5%	
Minority	32,610	56.6%	
<b>Ability to Speak English</b>			
<b>Population 5 years and over</b>			
Speak Only English	40,448	74.5%	
Speak Other Languages	13,838	25.5%	
Speak English "very well"	9,684	-	
Persons with Limited English Proficiency (LEP)	4,154	-	
Speak English "well"	2,242	-	
Speak English "not well"	1,514	-	
Speak English "not at all"	398	-	
<b>Poverty Status in the Past 12 Months</b>			
<b>Persons for whom poverty status is determined</b>			
Persons with income below poverty level	8,076	14.1%	
<b>Poverty Status for Families in the Past 12 Months</b>			
<b>Total Families</b>			
Families with income below poverty level	1,543	10.6%	

Source: United States Census Bureau, American Community Survey 2019-2023 5yr Estimates

## Coolidge Report

Topic	Estimate	Percent
<b>Gender and Age</b>		
<b>Total Population</b>	<b>15,300</b>	-
<b>Gender</b>		
Male	6,854	44.8%
Female	8,446	55.2%
<b>Age</b>		
<b>Select Age Groups</b>		
18 years and over	11,224	73.4%
21 years and over	10,674	69.8%
62 years and over	2,443	16.0%
65 years and over	2,173	14.2%
<b>Race and Ethnicity</b>		
<b>Total Population</b>	<b>15,300</b>	-
Hispanic	8,272	54.1%
<b>Non-Hispanic</b>		
White, Non-Hispanic	4,897	32.0%
Black, Non-Hispanic	810	5.3%
Native American, Non-Hispanic	809	5.3%
Asian, Non-Hispanic	74	0.5%
Pacific Islander, Non-Hispanic	13	0.1%
Other, Non-Hispanic	30	0.2%
Two or More, Non-Hispanic	395	2.6%
Minority	10,403	68.0%
<b>Ability to Speak English</b>		
<b>Population 5 years and over</b>	<b>14,434</b>	-
Speak Only English	9,990	69.2%
Speak Other Languages	4,444	30.8%
Speak English "very well"	3,303	-
Persons with Limited English Proficiency (LE)	1,141	-
Speak English "well"	533	-
Speak English "not well"	359	-
Speak English "not at all"	249	-
<b>Poverty Status in the Past 12 Months</b>		
<b>Persons for whom poverty status is determined</b>	<b>15,265</b>	-
Persons with income below poverty level	3,384	22.2%
<b>Poverty Status for Families in the Past 12 Months</b>		
<b>Total Families</b>	<b>3,315</b>	-
Families with income below poverty level	602	18.2%

Source: United States Census Bureau, American Community Survey 2019-2023 5yr Estimates

Eloy Report			
Topic	Estimate	Percent	
Gender and Age			
<b>Total Population</b>	<b>16,671</b>		-
<b>Gender</b>			
Male	11,418	68.5%	
Female	5,253	31.5%	
<b>Age</b>			
<b>Select Age Groups</b>			
18 years and over	14,432	86.6%	
21 years and over	13,908	83.4%	
62 years and over	3,927	23.6%	
65 years and over	3,122	18.7%	
<b>Race and Ethnicity</b>			
<b>Total Population</b>	<b>16,671</b>		-
Hispanic	7,909	47.4%	
<b>Non-Hispanic</b>			
White, Non-Hispanic	5,801	34.8%	
Black, Non-Hispanic	1,315	7.9%	
Native American, Non-Hispanic	770	4.6%	
Asian, Non-Hispanic	148	0.9%	
Pacific Islander, Non-Hispanic	253	1.5%	
Other, Non-Hispanic	45	0.3%	
Two or More, Non-Hispanic	430	2.6%	
Minority	10,870	65.2%	
<b>Ability to Speak English</b>			
<b>Population 5 years and over</b>	<b>16,212</b>		-
Speak Only English	10,462	64.5%	
Speak Other Languages	5,750	35.5%	
Speak English "very well"	3,740	-	
Persons with Limited English Proficiency (LEP)	2,010	-	
Speak English "well"	749	-	
Speak English "not well"	688	-	
Speak English "not at all"	573	-	
<b>Poverty Status in the Past 12 Months</b>			
<b>Persons for whom poverty status is determined</b>	<b>11,153</b>		-
Persons with income below poverty level	2,374	21.3%	
<b>Poverty Status for Families in the Past 12 Months</b>			
<b>Total Families</b>	<b>3,207</b>		-
Families with income below poverty level	574	17.9%	

Source: United States Census Bureau, American Community Survey 2019-2023 5yr Estimates

Pinal County Report			
Topic	Estimate	Percent	
<b>Gender and Age</b>			
<i>Total Population</i>	<b>449,219</b>	-	
<b>Gender</b>			
Male	233,422	52.0%	
Female	215,797	48.0%	
<b>Age</b>			
<b>Select Age Groups</b>			
18 years and over	351,626	78.3%	
21 years and over	336,985	75.0%	
62 years and over	112,059	24.9%	
65 years and over	95,754	21.3%	
<b>Race and Ethnicity</b>			
<i>Total Population</i>	<b>449,219</b>	-	
Hispanic	131,771	29.3%	
<b>Non-Hispanic</b>			
White, Non-Hispanic	251,010	55.9%	
Black, Non-Hispanic	21,823	4.9%	
Native American, Non-Hispanic	16,900	3.8%	
Asian, Non-Hispanic	7,037	1.6%	
Pacific Islander, Non-Hispanic	1,572	0.3%	
Other, Non-Hispanic	1,701	0.4%	
Two or More, Non-Hispanic	17,405	3.9%	
Minority	198,209	44.1%	
<b>Ability to Speak English</b>			
<i>Population 5 years and over</i>	<b>425,204</b>	-	
Speak Only English	343,633	80.8%	
Speak Other Languages	81,571	19.2%	
Speak English "very well"	58,486	-	
Persons with Limited English Proficiency (LE)	23,085	-	
Speak English "well"	12,457	-	
Speak English "not well"	7,440	-	
Speak English "not at all"	3,188	-	
<b>Poverty Status in the Past 12 Months</b>			
<i>Persons for whom poverty status is determined</i>	<b>429,221</b>	-	
Persons with income below poverty level	46,664	10.9%	
<b>Poverty Status for Families in the Past 12 Months</b>			
<i>Total Families</i>	<b>113,297</b>	-	
Families with income below poverty level	8,867	7.8%	

Source: United States Census Bureau, American Community Survey 2019-2023 5yr Estimates

## 9. 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, 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 <https://scmpo.org/wp-content/uploads/2020/09/FINAL-SCMPO-PPP-2021-09082020.pdf>.

### **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 2<sup>nd</sup> Tuesday of every other month. The Sun Corridor MPO's Technical Advisory Committee meets the 4<sup>th</sup> Thursday of every other month. The upcoming Annual Meeting Schedule is published on the Sun Corridor MPO website in November 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 of each meeting.

The following statement is conveyed on each meeting schedule as well as on each agenda, *Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and other nondiscrimination laws and authorities, The Sun Corridor*

*Metropolitan Planning Organization (SCMPO) does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons that require reasonable accommodation based on language or disability should contact Irene Higgs, SCMPO's Title VI Coordinator at [ihiggs@scmpo.org](mailto:ihiggs@scmpo.org) or (520)705-5143. Requests should be made at least 48 hours prior to the meeting so that accommodations may be arranged.*

*En conformidad con el Título VI del Decreto de los Derechos Civiles de 1964, el Decreto de Americanos con Discapacidades (ADA por sus siglas en inglés), y otras leyes y autoridades contra la discriminación, la organización de planificación metropolitana Sun Corridor Metropolitan Planning Organization (SCMPO por sus siglas en inglés) no discrimina basándose en raza, color, origen nacional, género/sexo, edad o discapacidad. Las personas que requieran una adaptación razonable basada en idioma o discapacidad se deben comunicar con Irene Higgs, Coordinadora del Título VI de SCMPO en [ihiggs@scmpo.org](mailto:ihiggs@scmpo.org) ó llamando al (520)705-5143. Las solicitudes se deben hacer por lo menos 48 horas antes de la reunión para que se puedan organizar las adaptaciones.*

To date, no request has been made.

Public participation is promoted at each meeting and our agendas provide an opportunity for the public to make comments on any unrelated agenda topic as well as during discussion on an agenda topic.

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

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.

Just opening the process to the public is not enough. There are numerous populations that are not likely to get involved unless a special effort is made to reach out to them. In this Plan, groups that need a more focused effort to get involved are referred to as "underserved populations". These 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 rely on alternative transportation;
- People with limited English proficiency;
- Aging populations.

The Sun Corridor MPO will make every effort to hold public meetings in facilities that are compliant with the Americans with Disabilities Act (ADA); and, arrange for reasonable accessibility and accommodation to persons with disabilities. Further, to provide equally effective communication, Sun Corridor MPO will make do preparation, when appropriate, for persons requiring assistance, such as the hearing or visually impaired, upon request.

The Sun Corridor MPO will assist persons with limited English proficiency (LEP) to participate in the transportation planning process. Staff will make every effort to provide Spanish translators and document translation, where feasible, upon request. Individuals who are not able to attend meetings may make a request the information at Sun Corridor MPO offices for delivery of materials to their homes. Sun Corridor MPO staff, coordinating availability, is willing to go speak to groups to eliminate participation barriers and involve citizens in the transportation process. By making a reasonable extra effort to include these populations, the Sun Corridor MPO hopes to ensure that the interests and input of all residents are given equal consideration.

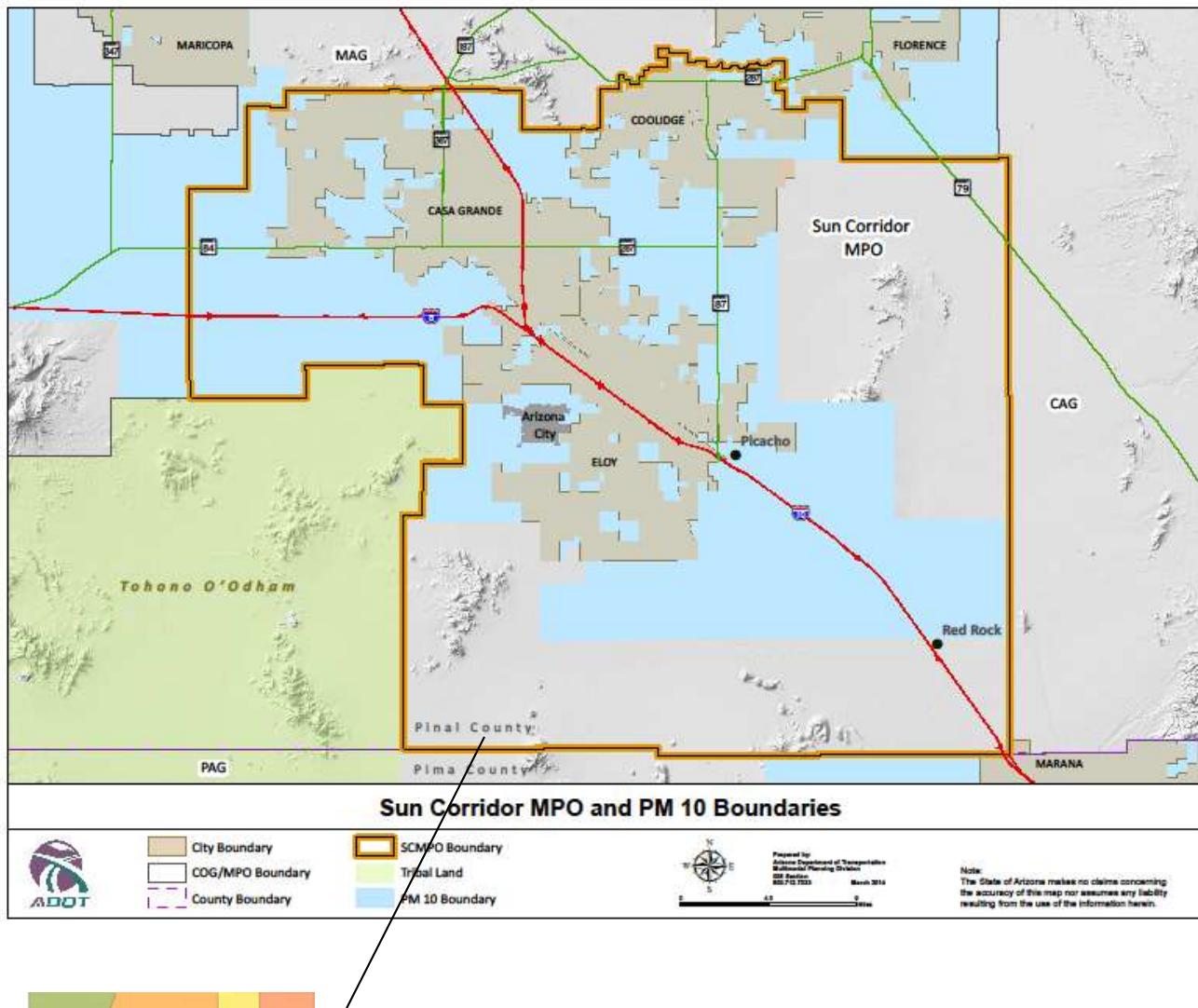
The Sun Corridor MPO has provided other means of outreach other than from the traditional methods. One method used was providing a survey in English and in Spanish to seek input on a safety study, with a chance to win a Gift Card. Surveys were available on-line and provided to the local agencies and to specific site locations that were identified having heavy foot traffic such as community centers, senior centers, libraries, after school programs, and schools. Other untraditional methods will be used pending the nature of the project to engage LEP persons.

Listed below are various outreach processes that may be used by the Sun Corridor MPO to ensure full and fair participation of minority and low income population by all potential affected populations in the transportation decision-making process:

- Translate outreach materials based on a LEP Four-Factor analysis conducted on a project-by-project basis.
- Advertise meetings, public notices, and other materials in the Tri-Valley newspapers, SCMPD and local agency websites, and other high traffic locations frequented by the public.
- Advance demographic research of potentially impacted communities for transportation-related study projects to determine the level and targeted outreach tools needed for public involvement based on LEP, EJ and Title VI Data collection.
- Include Spanish text on Sun Corridor MPO materials to the public notifying them of the opportunity to request language services, if needed.
- Forming partnerships between member entities, public and private sectors.

- Consider the proximity to public transportation routes when selecting a meeting location.
- Schedule public meetings at the appropriate time of day based on community assessments.
- Use of Title VI Self-identification cards at meetings.
- Use of various types of modes to communicate Sun Corridor MPO meetings.
- Virtual public involvement is a new opportunity for information sharing and public involvement in the transportation planning, programming, and project development process. These new opportunities include, but are not limited to techniques, such as telephone town halls and online meetings, pop-up outreach, social meetings/ meeting-in-a box kits, story maps, quick videos, crowdsourcing, survey tools, real-time polling tools, social media following, and visualization. All virtual meetings have a call-in option for those that may have limited or no access to the internet.

## 10. 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 1,155 square miles and has an estimated population of 112,011.



## 11. Sun Corridor MPO Organization

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***

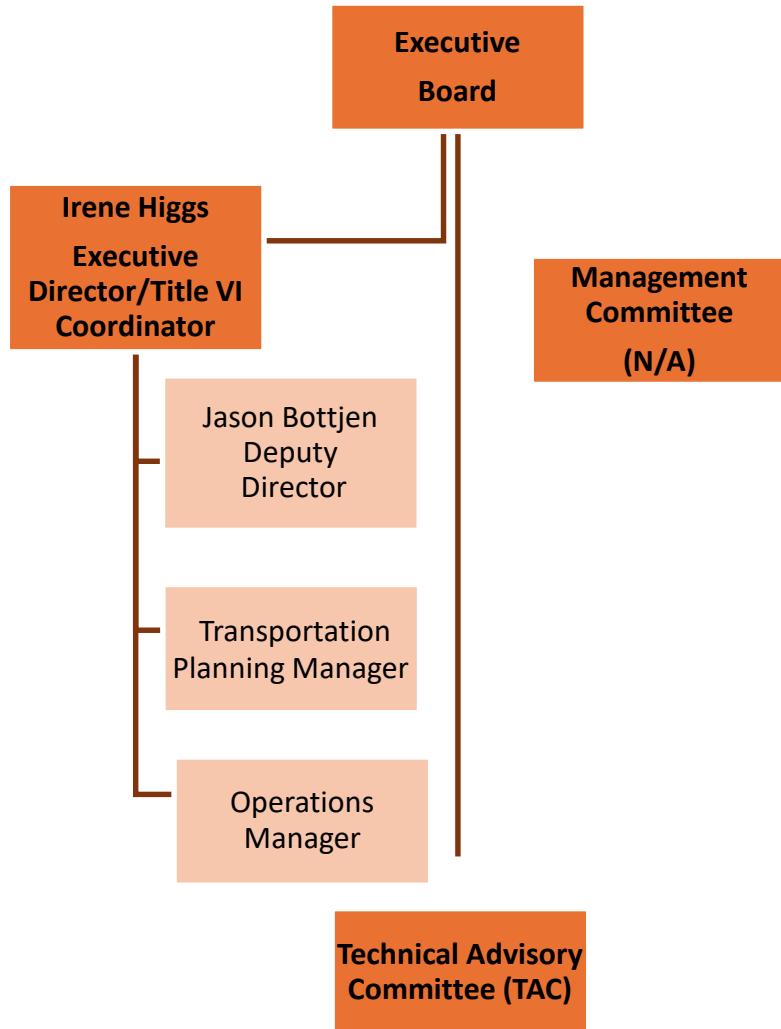
The Sun Corridor MPO was developed in 2013, and is dedicated to serving its local jurisdictions, within the cities of Casa Grande, Coolidge, Eloy and the small urban and rural portions of Pinal County. Federal regulations require that an MPO be designated to carry out a comprehensive, continuing, and 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 Executive Board for the Sun Corridor MPO is responsible for ensuring the implementation and approval of the Sun Corridor MPO Title VI Plan and 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, when available. 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  
211 N Florene St. Ste 103  
Casa Grande, Az 85122  
520-705-5143  
[ihiggs@scmpo.org](mailto:ihiggs@scmpo.org)  
[www.scmpo.org](http://www.scmpo.org)

**Sun Corridor MPO Membership**

**a. Executive Board**

As outlined in the Sun Corridor MPO Executive Board By-Laws (Adopted 05/09/17, Amended March 11, 2025), the **Executive Board** consists of elected officials from the Cities of Casa Grande, Coolidge, Eloy, and Pinal County; one member from the Arizona Department of Transportation's State Transportation Board who is appointed to the State Transportation Board by the Governor; and one ex-officio from Federal Highways Administration. 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 for the Sun Corridor MPO is responsible for ensuring the implementation and approval of the Sun Corridor MPO Title VI Plan and program.

<b>Sun Corridor MPO Executive Board Representative</b>		
City of Casa Grande	One Member	Mayor
City of Coolidge	One Member	Mayor
City of Eloy	One Member	Mayor
Pinal County District 3	One Member	Pinal County Supervisor
ADOT Board Member District 4	One Member	Appointed by Governor
FHWA Ex-Officio Region 1	One Member	Senior Planner

**b. Technical Advisory Committee**

The Sun Corridor MPO **Transportation Advisory Committee (TAC)** is the technical advisory committee to the Executive Board. The TAC is comprised of one voting member representing Pinal County, City of Casa Grande, City of Coolidge, City of Eloy, and the Arizona Department of Transportation (ADOT), as outlined in the By-Laws (Adopted 05/29/14 and amended on March 11, 2025) for the TAC. Committee representatives should have expertise in any of the following transportation subjects: highways, public works, engineering, aeronautics, transit and planning. 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.

<b>Sun Corridor MPO TAC Representative</b>		
City of Casa Grande	One Member	Deputy Public Works Director
City of Coolidge	One Member	Public Works Director
City of Eloy	One Member	Public Works Director
Pinal County	One Member	Senior Transportation Planner
ADOT MPD	One Member	Planning Program Manager

#### ***C. Minority Representation on Planning Advisory Committees***

At this time, the Sun Corridor MPO does not have any committees where members are non-elected and selected by the MPO.

In future assignments of non-elected committees selected by the Sun Corridor MPO, the Sun Corridor MPO will utilize the self-identification survey to query interested members about their racial identity and/or ethnicity to create a table depicting the racial breakdown of the committee(s), as well as document efforts to encourage participation of minorities on committee(s).

## **12. Title VI Training**

Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under the duties of the Sun Corridor MPO Executive Director – Title VI Coordinator. Annually, Title VI nondiscrimination training will be offered to the Sun Corridor MPO staff, Executive Board, Technical Advisory Committee, consultants, and subrecipients. Annual training will be reported in the Goals and Accomplishment Report.

Annual Title VI training will include the following components:

- What is Title VI
  - Applies to all Federally funded projects, programs, and activities
- Title VI Notice to the Public
  - What is the Notice to the Public
  - Where it is posted
  - How to file a complaint
- Title VI Complaint Process
  - How to file a complaint;
  - FHWA or FTA Funded Program or Activity;
  - The complaint must be filed within **180 days** of the alleged occurrence or when the alleged discrimination became known to the complainant;
  - The complaint should be in writing and signed;
  - Determining the jurisdiction, acceptability, and the need for additional information upon receipt to investigate the merit;
  - Upon receipt of a complaint, SCMPD to forward to ADOT External Civil Rights Office (ECR) within 72 hours;
  - Take final action within 60 days, and
  - Provide appeal instructions.
- Limited English Proficiency (LEP)
  - What is LEP
  - How it is implemented
    - Four Factor Analysis
    - Publishing materials in languages other than English (e.g. Spanish)
    - Multi-language public outreach materials (Newspaper, Website, Social Media, Surveys, etc.)
    - Pictograms
    - Multi-language announcements at reception areas
    - Language identification using "I Speak" cards
- Title VI Annual Report
  - Accomplishments
    - Summary of public outreach and involvement activities, and description of steps to ensure minority & low-income people had meaningful access to activities
    - List of any Title VI investigations, complaints, or lawsuits
  - Discuss the public outreach and involvement activities, and description of steps to ensure minority & low-income people had meaningful access to activities
- Non-Compliance w/ Title VI
  - Withholding of payments to the recipient under the contract until the recipient complies, and/or
  - Cancellation, termination or suspension of the contract, in whole or in part
- **Sun Corridor MPO Staff** – Sun Corridor MPO staff will attend all relevant annual training sessions hosted by ADOT. All new hires, interns, or volunteers will be given

training on this topic during their employee orientation and annually. Training will be tracked and reported annually to ADOT's Civil Rights Division. Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under the duties of the Sun Corridor MPO Executive Director – Title VI Coordinator.

- **Executive Board** - This training will occur annually and functions as part training and debriefing regarding highlights from the previous reporting year. The training portion is high-level and is tailored to identify and address major challenges and special emphasis areas findings from the Title VI Implementation Plan and Annual Goals and Accomplishment Report. Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under duties of the Sun Corridor MPO Executive Director – Title VI Coordinator.
- **Technical Advisory Committee** - This training will occur annually and functions as part of training and debriefing regarding highlights from the previous reporting year. The training portion is high-level and is tailored to identify and address major challenges and special emphasis areas. Findings from the Title VI Implementation Plan and Annual Goals and Accomplishment Report. Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under duties of the Sun Corridor MPO Executive Director – Title VI Coordinator.
- **Subrecipients** - Subrecipients contracts will be reviewed to ensure that the assurances are being followed, which will be followed by training. The content of the training is developed specifically to address the issues/challenges facing each subrecipient as communicated through the subrecipient review. At the current time, the Sun Corridor MPO does not have any subrecipients. Compliance for the Sun Corridor MPO transportation planning program is ongoing and falls under duties of the Sun Corridor MPO Executive Director – Title VI Coordinator.
- **Consultants** - A copy of the Sun Corridor MPO Title VI Training is provided to all Consultants at the execution of the signed contract.

## **13. Compliance, Monitoring, and Non-Compliance**

The Sun Corridor MPO is a recipient of federal financial assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (Title VI).

The Sun Corridor MPO, consultants, and its subrecipients of federal-aid funds must ensure that all of its programs and activities are operated in a nondiscriminatory manner. Subrecipients will provide an annual report describing Title VI data findings from the agency and subcontractors, outreach methods, Title VI implementation changes and upcoming Title VI program goals. Annual reports are analyzed and categorized based on a high/low risk assessment. Compliance reviews of program areas, subrecipients, and consultant contracts of federal financial assistance will be conducted on an annual cycle to determine level of compliance with Title VI requirements. This means that each program area will undergo a high/low risk based assessment for compliance with Title VI at least once every three years. The Title VI Coordinator will conduct compliance reviews annually to:

- Ensure compliance with Title VI;
- Provide technical assistance;
- Respond to complaints; and
- Correct deficiencies.

High/Low Risk Assessment for internal program reviews:

- Deficiencies on Reports and Title VI Meeting Summaries
- Demographic data collection and analysis
- Date of last program area training
- Complaints received

### **a. *Program Area Review***

The Title VI Coordinator will review program areas for Title VI compliance. This will be done by examining data collection methods, public notification practices, and public participation practices. If deficiencies are found, then staff will look at best practices being used by other MPO's and/or ADOT.

### **b. *Subrecipient Review***

The Title VI Coordinator is responsible for annually reviewing subrecipient contracts and planning agreements for Title VI compliance. This is accomplished through contract review, training, onsite visits and personal interviews of staff. At the current time, the Sun Corridor MPO does not have any subrecipients.

***b. Consultant Contract Review***

The Title VI Coordinator is responsible for overseeing the preparation and execution of all planning study contracts for consultants to ensure Title VI compliance.

FHWA Funded Contracts will be reviewed annually for the following:

- Include the most recently signed assurances;
- Include subrecipient signed assurances; and
- Ensure the consultant is complying with Title VI Assurances.
- The following language is included in all contracts to ensure subconsultants are complying with Title VI:
  - A copy of the Prime Contract is included as Attachment C. All portions thereof, including but not limited to Exhibit "C"-Appendix A of the Sun Corridor Metropolitan Planning Organization Title VI Plan and Exhibit "D"-Appendix E of the Sun Corridor Metropolitan Planning Organization Title VI Plan, not in conflict with any provision of this Agreement, are incorporated herein by reference.

***c. Non-Compliance***

If deficiencies are found:

MPO Staff

1. If non-compliance is found in any of the Program Areas that a MPO Staff member is responsible for, the Title VI Coordinator will issue a formal written warning to the appropriate MPO staff member. A meeting will be held with the staff member to discuss possible technical assistance, training, and an action plan towards full compliance. If non-compliance continues, further disciplinary action and/or termination of staff may occur as determined by the Executive Director/Title VI Coordinator.

Subrecipient/Consultants

1. Within 30 days of the review, deficiencies will be documented in a report provided to the subrecipient/consultant, and the ADOT External Civil Rights office.
2. All deficiencies should be corrected within 90 days of receipt of the report.
3. Within 30 days of report mailing, a meeting will be scheduled to discuss possible technical assistance and an action plan to meet full compliance.
4. Outstanding high-priority vital items will be submitted within 30 days of report mailing.
5. The subrecipient/consultant will be asked to submit a formal action plan within 45 days of report mailing.

6. Within 90 days, the subrecipient/consultant must be fully compliant on outstanding deficiencies.
7. If not compliant, the Title VI Coordinator will make a formal funding recommendation to the appropriate oversight division and/or federal authority.

The following can be outcomes of non-compliance with Title VI:

- Withholding payments to the subrecipient/consultant under the contract until compliance, and/or
- Cancellation, termination, or suspension of the contract, in whole or in part.

The Title VI Coordinator will determine if additional monitoring is needed to ensure ongoing compliance with Title VI requirements.

***d. Compliance***

If no deficiencies are found:

MPO Staff

1. No action required.

Subrecipient/Consultants

1. A formal letter of full compliance will be provided within 30 days of on-site review along with a report of findings. The report may still provide recommendations for strengthening the Title VI Program.

## Exhibit “A” - Complaint Forms and Complaint Log



## Discrimination Complaint Form

Note: *The following information is needed to assist in processing your complaint.*

Complainant's Information:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Email: \_\_\_\_\_

Home Phone Number: \_\_\_\_\_ Alternate Phone Number: \_\_\_\_\_

Person discriminated against (someone other than complainant):

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Email: \_\_\_\_\_

Home Phone Number: \_\_\_\_\_ Alternate Phone Number: \_\_\_\_\_

Which of the following best describes the reason you believe the discrimination took place?

Please be specific.

Race \_\_\_\_\_  Color \_\_\_\_\_

Disability \_\_\_\_\_  National Origin \_\_\_\_\_

On what date(s) did the alleged discrimination take place? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

What is the name and title of the person(s) who you believe discriminated against you (if known)?  
\_\_\_\_\_  
\_\_\_\_\_

Describe the alleged discrimination. Explain what happened and who you believe was responsible. (If additional space is needed, add a sheet of paper).  
\_\_\_\_\_  
\_\_\_\_\_



List names and contact information of persons who may have knowledge of the alleged discrimination.

If you have filed this complaint with any other federal, state, or local agency, or with any federal or state court, check all that apply.

Federal Agency     Federal Court     State Agency     State Court     Local Agency

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Please sign below. You may attach any written materials or other information you think is relevant to your

complaint. \_\_\_\_\_ Number of attachments: \_\_\_\_\_

Submit form and any additional information to:

## Sun Corridor MPO

ATTN: Irene Higgs, Executive Director - Title VI Program Coordinator

211 N. Florence St., Ste. 103

Casa Grande, AZ 85122

Phone: 520.705.5143

ihiggs@scmpo.org

2026 Title VI Plan

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## Forma Para Poner una Queja De Acuerdo Al ADA Y Título VI

*Nota: La siguiente información se necesita para procesar su queja.*

### Información de la persona que está poniendo la queja:

Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Código Postal \_\_\_\_\_  
Teléfono (Casa): \_\_\_\_\_ Teléfono (Trabajo): \_\_\_\_\_

### Persona A La Que Se Discriminó (alguien que no sea la persona que está poniendo la queja)

Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Código Postal \_\_\_\_\_  
Teléfono (Casa): \_\_\_\_\_ Teléfono (Trabajo): \_\_\_\_\_

### ¿Cuál de las siguientes razones describe por lo que usted siente que se le discriminó?

Raza \_\_\_\_\_  Nacionalidad (Especifique) \_\_\_\_\_  
 Color (Especifique) \_\_\_\_\_  Discapacidad (Especifique) \_\_\_\_\_

¿En qué fecha(s) sucedió la discriminación? \_\_\_\_\_

¿En dónde sucedió la discriminación? \_\_\_\_\_

¿Cuál es el nombre y título de la persona(s) que usted siente que cometió la discriminación contra usted (si lo sabe)? \_\_\_\_\_

Describa la presunta discriminación. Explique qué sucedió y quién cree usted que fue responsable (si necesita más espacio, agregue otra hoja).  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



Escriba una lista con los nombres de las personas que puedan tener conocimiento de la presunta discriminación y cómo contactarlas. \_\_\_\_\_

Si ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal, marque todas las que apliquen.

Agencia Federal  Corte Federal  Agencia Estatal  Corte Estatal  
 Agencia Local

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre:

Dirección: \_\_\_\_\_

Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Código Postal \_\_\_\_\_

Teléfono (Casa): \_\_\_\_\_ Teléfono (Trabajo): \_\_\_\_\_

Por favor firme abajo. Puede incluir cualquier material escrito u otra información que usted crea que es importante para probar su queja.

**Firma de la Persona que presenta la queja** **Fecha**

Número de anexos: \_\_\_\_\_

**Someta la forma y cualquier información adicional a:**

## Sun Corridor MPO

ATTN: Irene Higgs, Executive Director -  
Title VI Program Coordinator

211 N. Florence St., Ste. 103

Casa Grande, AZ 85122

Phone: 520.705.5143

ihiggs@scmpo.org



211 N. Florence St., Ste. 103  
Casa Grande, AZ 88122

**Annual Report Date: July 1, 2025– June 30, 2026**

### **Title VI Complaints, Investigations and Lawsuits**

Description/Name	Date Month, Day & Year	Funding Source (FHWA or FTA)	Summary (Basis of Complaint)*	Status	Actions / Final Findings
<b>Complaints</b>					
1)					
2)					
3)					
<b>Investigations</b>					
1)					
2)					
3)					
<b>Lawsuits</b>					
1)					
2)					
3)					

\*Specific category, i.e. Race, Color or National Origin

Report to be Submitted Annually to ADOT Title VI Department; a NIL Report is Required

## Exhibit “B” - Demographic Maps:

### Sun Corridor MPO Project List and Map

#### Race and Ethnicity

- Asian
- Black
- Hispanic or Latino
- Native American
- Other Race
- Pacific Islander
- Two or More Races
- White

#### Select Age Group

- 65 years and over

#### Ability to Speak English

- Percent Limited English Proficiency (LEP)

#### Poverty Status in the Past 12 Months

- Percent of Families Below Poverty Level

#### Persons - Poverty

- Persons – Percent Below Poverty Level
- Percent Persons with income below 150% of Poverty Level
- Percent Persons with income below 200% of Poverty Level

#### Vehicles Available

- Percent No Vehicles Available
- Percent One Vehicle Available
- Percent Two Vehicle Available
- Percent Three Vehicle Available

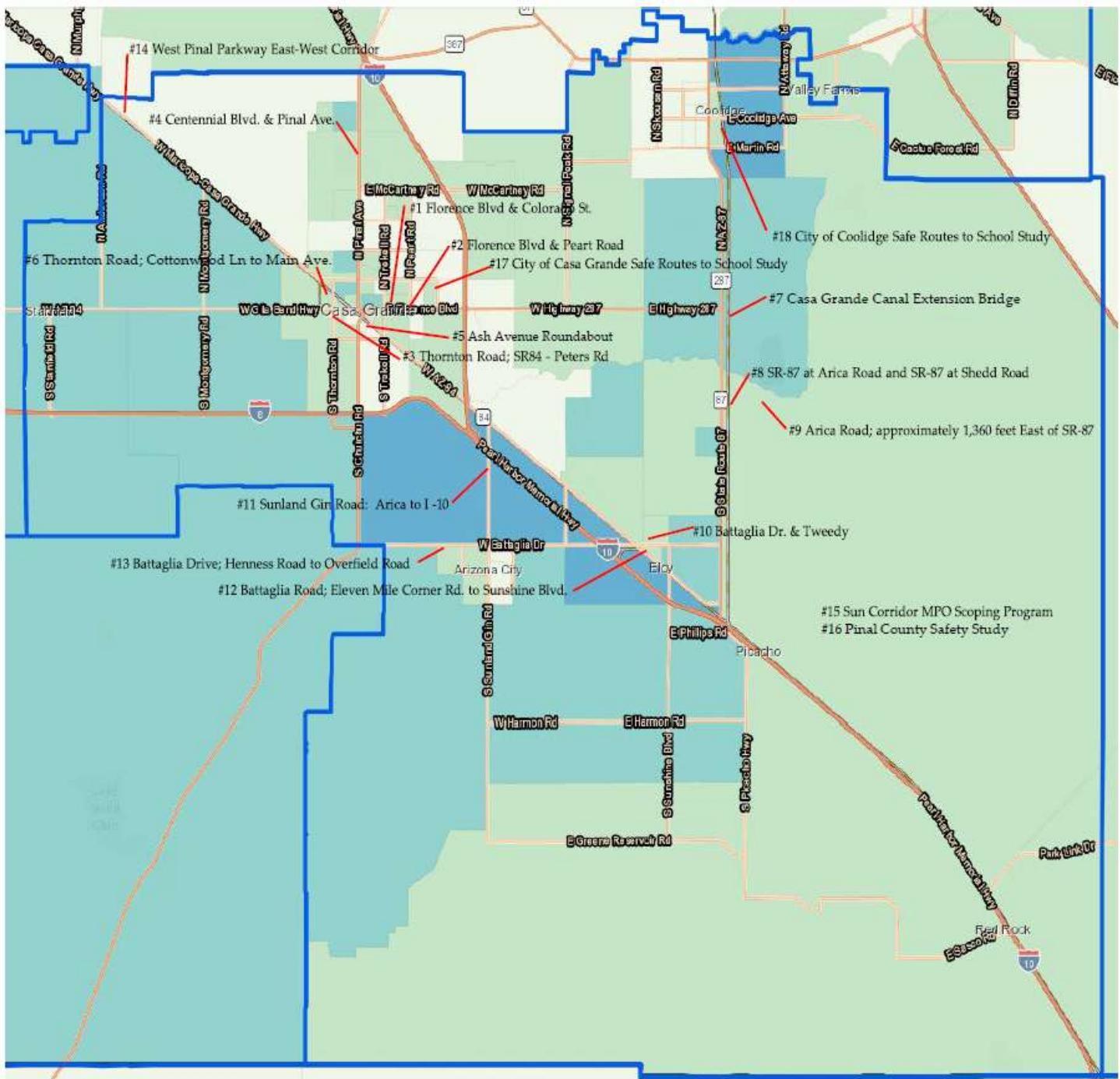
Source: United States Census Bureau, American Community Survey 2018-2022 5 Year Estimates

Below is a list of federally funded design, construction and planning projects for the Sun Corridor MPO Region Transportation Improvement Program (TIP). The corresponding map illustrates the approximate location of each project within the region.

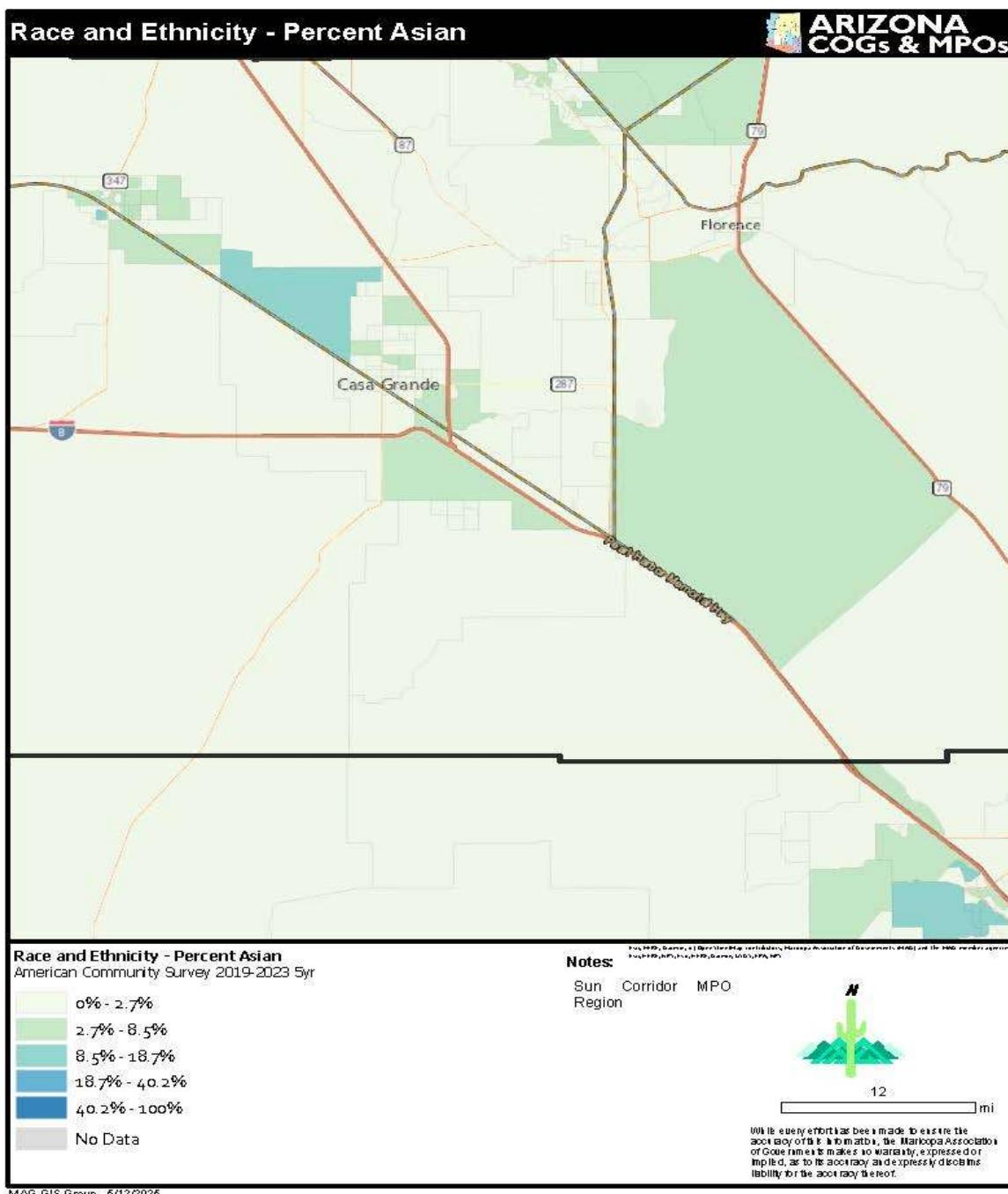
City of Casa Grande					
#	Programmed Year(s) Design/Construction	Project Name	Type of Work	Type of Funds	Total Amount
1	2024/2026	Florence Blvd & Colorado St.	Raised Median	HSIP	\$588,040
2	2024/2026	Florence Blvd & Peart Road	Removal of Median and extension of left turn lanes	HSIP	\$504,083
3	2026	Thornton Road; SR84 - Peters Rd	Construct Road Widening	Federal Earmark	\$,5,560,000
4	2025	Centennial Blvd. & Pinal Ave.	Traffic Signal	Federal Earmark	\$1,400,000
5	2025	Ash Avenue Roundabout	Construct Roundabout	Federal Earmark	\$3,470,000
6	2025	Thornton Road Widening; Cottonwood Lane to Main Ave.	Construct additional lanes	Federal Earmark	\$4,024,390
City of Coolidge					
#	Programmed Year(s) Design/Construction	Project Name	Type of Work	Type of Funds	Total Amount
7	2025/2026	Casa Grande Canal Extension Bridge	Design and Construct Bridge Replacement	ADOT Off-System Bridge Program	\$2,581,500
8	2024	SR-87 at Arica Road and SR-87 at Shedd Road	Design - intersection improvements	State	\$700,000
9	2024	Arica Road; approximately 1,360 feet East of SR-87	Construction of railroad crossing improvements	ESP	\$1,000,000
City of Eloy					

#	Programmed Year(s) Design/Construction	Project Name	Type of Work	Type of Funds	Total Amount
10	2024/2025	Battaglia Dr. & Tweedy Rd	Intersection Lighting	HSIP	\$307,749
11	2024/2025	Sunland Gin Road: Arica to I-10	Reconstruct and widening of the existing roadway	State	\$10,000,000
12	2024	Battaglia Road; Eleven Mile Corner Rd. to Sunshine Blvd.	Scoping/Design - Sidewalk, vertical curb and gutter, ADA ramps	TA	\$295,894
<b>Pinal County</b>					
13	2024/2026	Battaglia Drive; Henness Road to Overfield Road	3 miles of 5' north side & 2' south side installation of shoulders	HSIP	\$3,396,875
14	2024	West Pinal Parkway East-West Corridor	Pre- Engineering and Design	State	\$9,240,000
<b>Sun Corridor MPO</b>					
#	Programmed Year(s) Design/Construction	Project Name	Type of Work	Type of Funds	Total Amount
15	2026/2027	Sun Corridor MPO Scoping Program	Scoping	STBG	\$708,283
16	2023/2024	Pinal County Safety Study	Countywide Study	HSIP	\$306,976
17	2024	City of Casa Grande Safe Routes to School Study	Multiple Locations in Casa Grande	TA	\$433,370
18	2024	City of Coolidge Safe Routes to School Study	Multiple Locations in Coolidge	TA	\$195,545

## **Sun Corridor MPO Project List and Map**

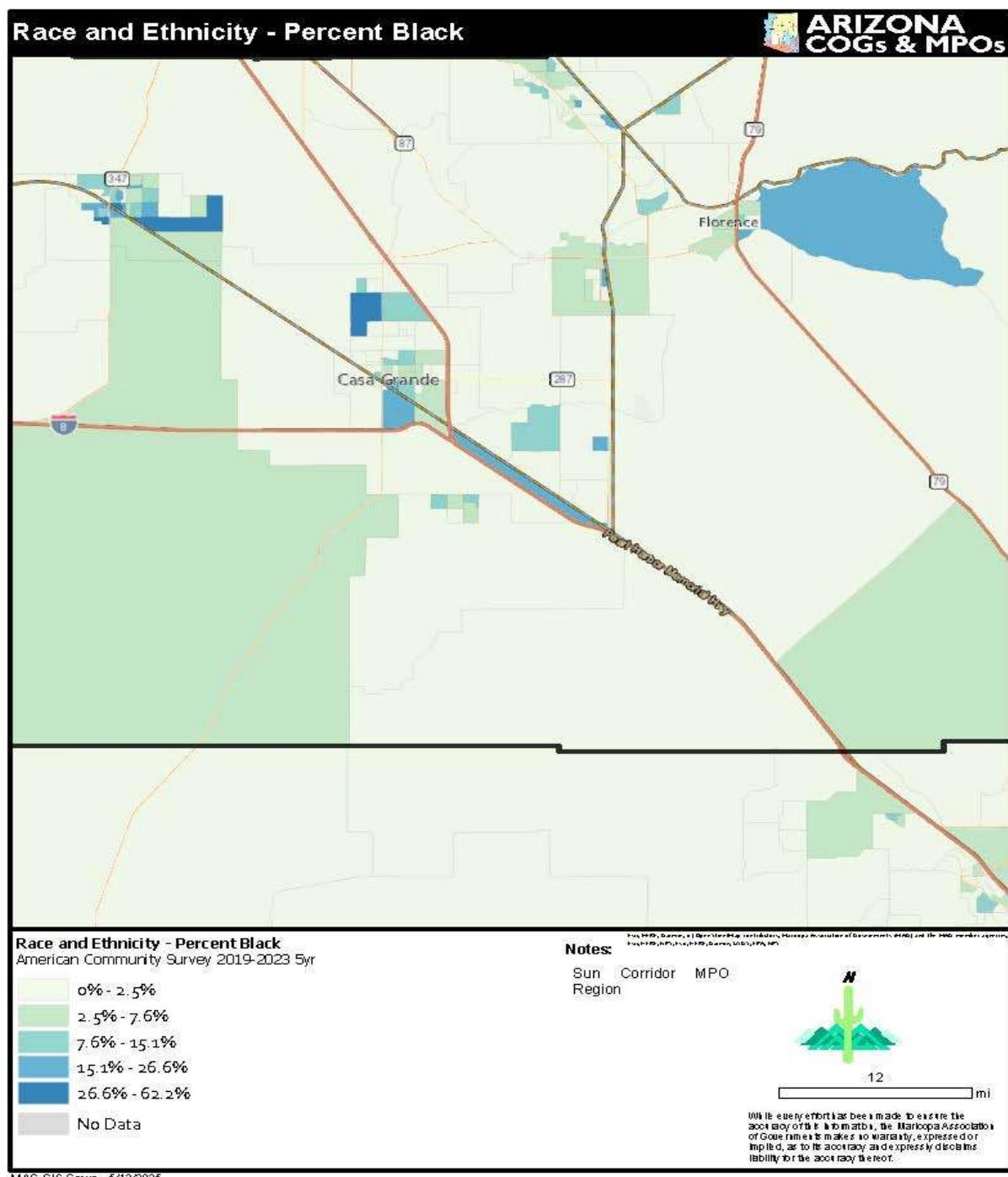


## Race and Ethnicity - Percent Asian



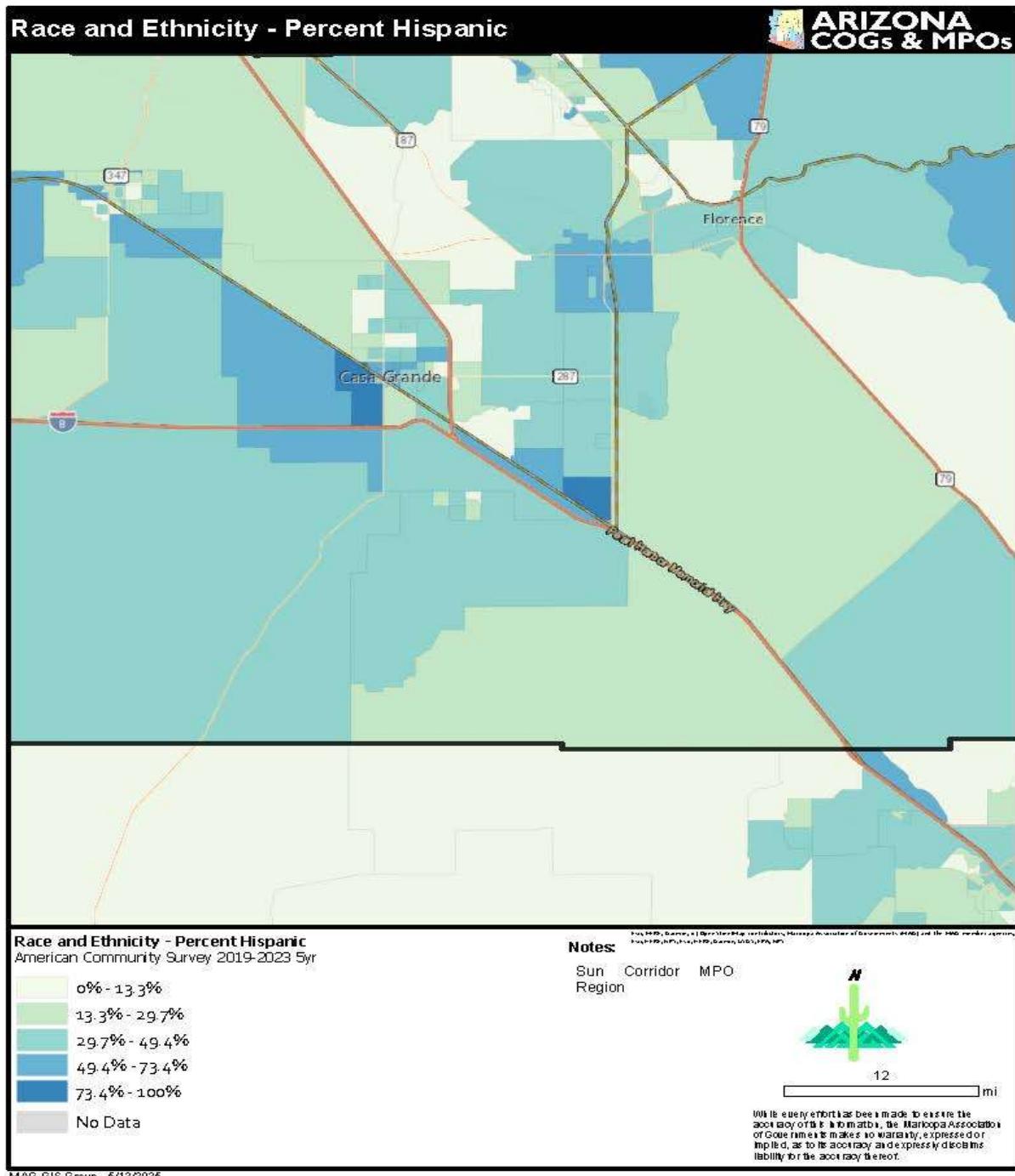
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Race and Ethnicity - Percent Black



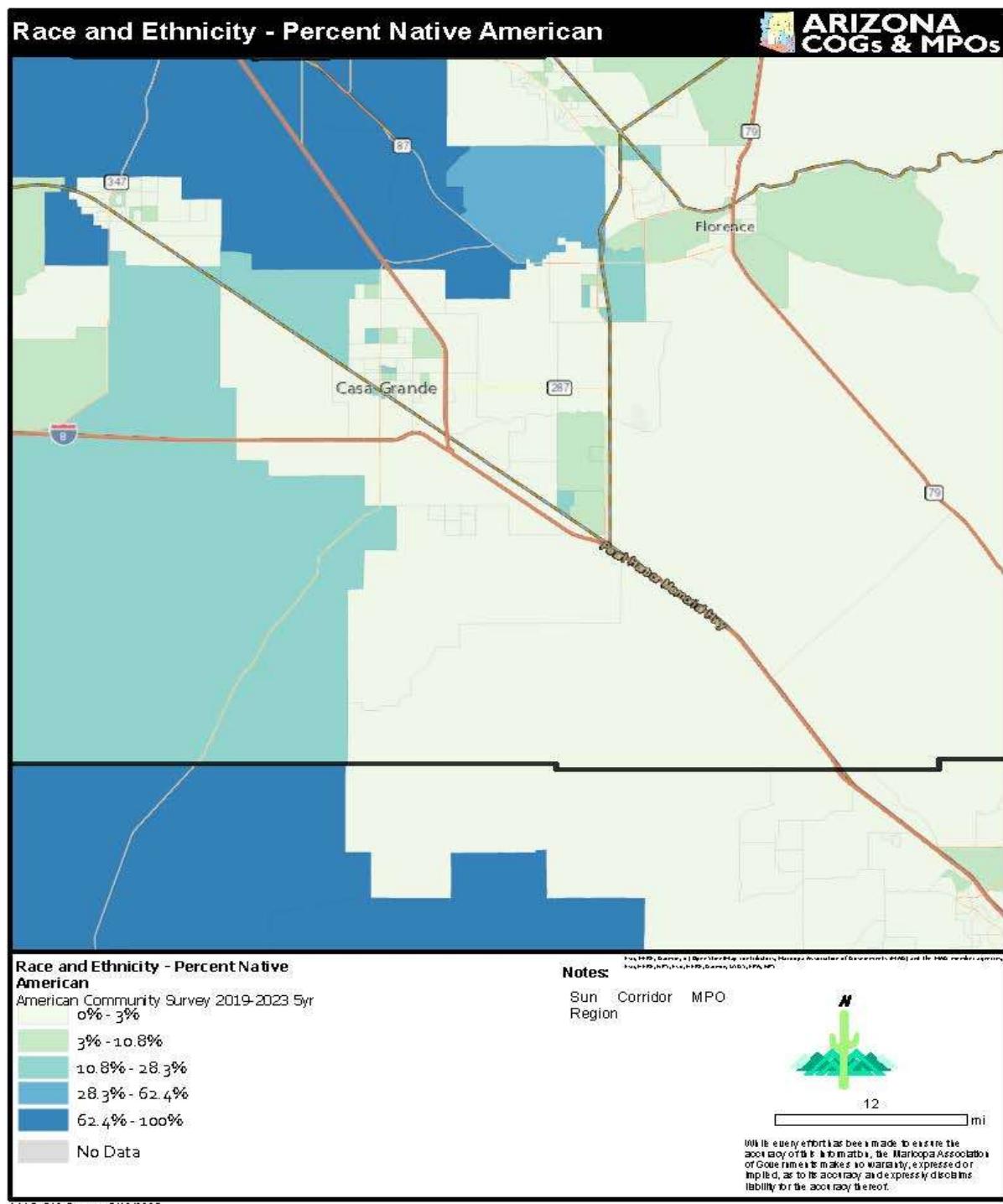
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Race and Ethnicity - Percent Hispanic



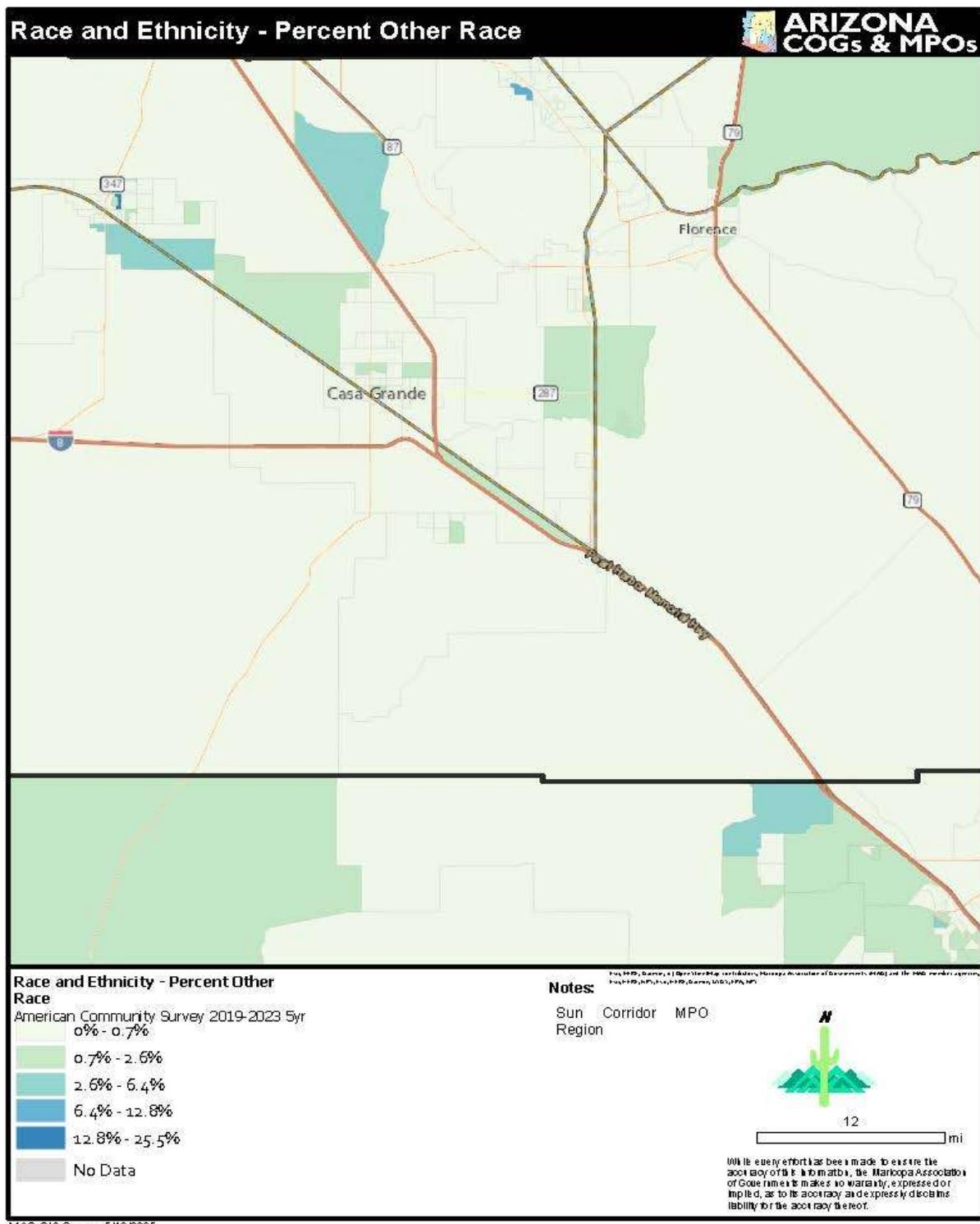
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Race and Ethnicity - Percent Native American



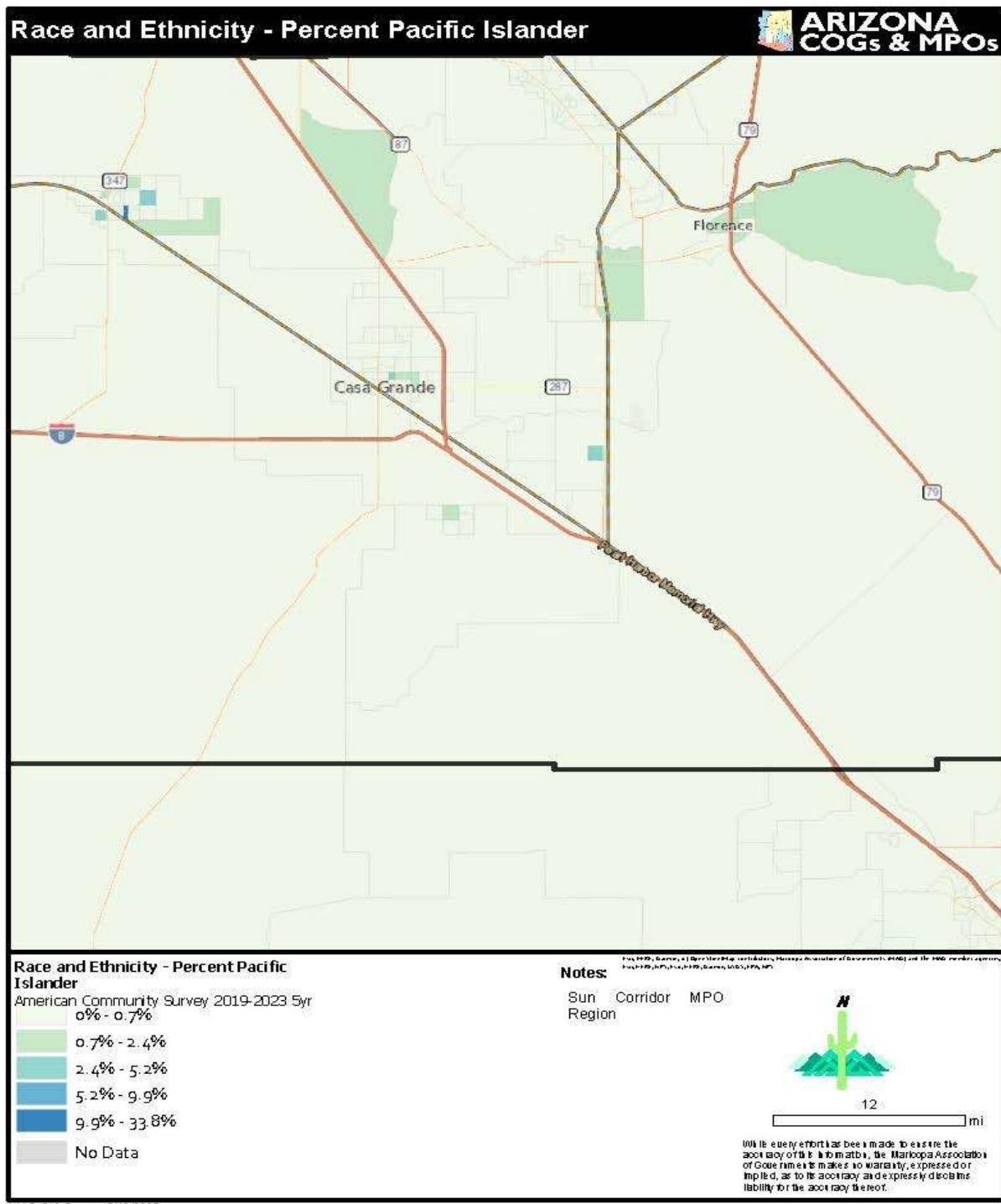
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Race and Ethnicity - Percent Other Race



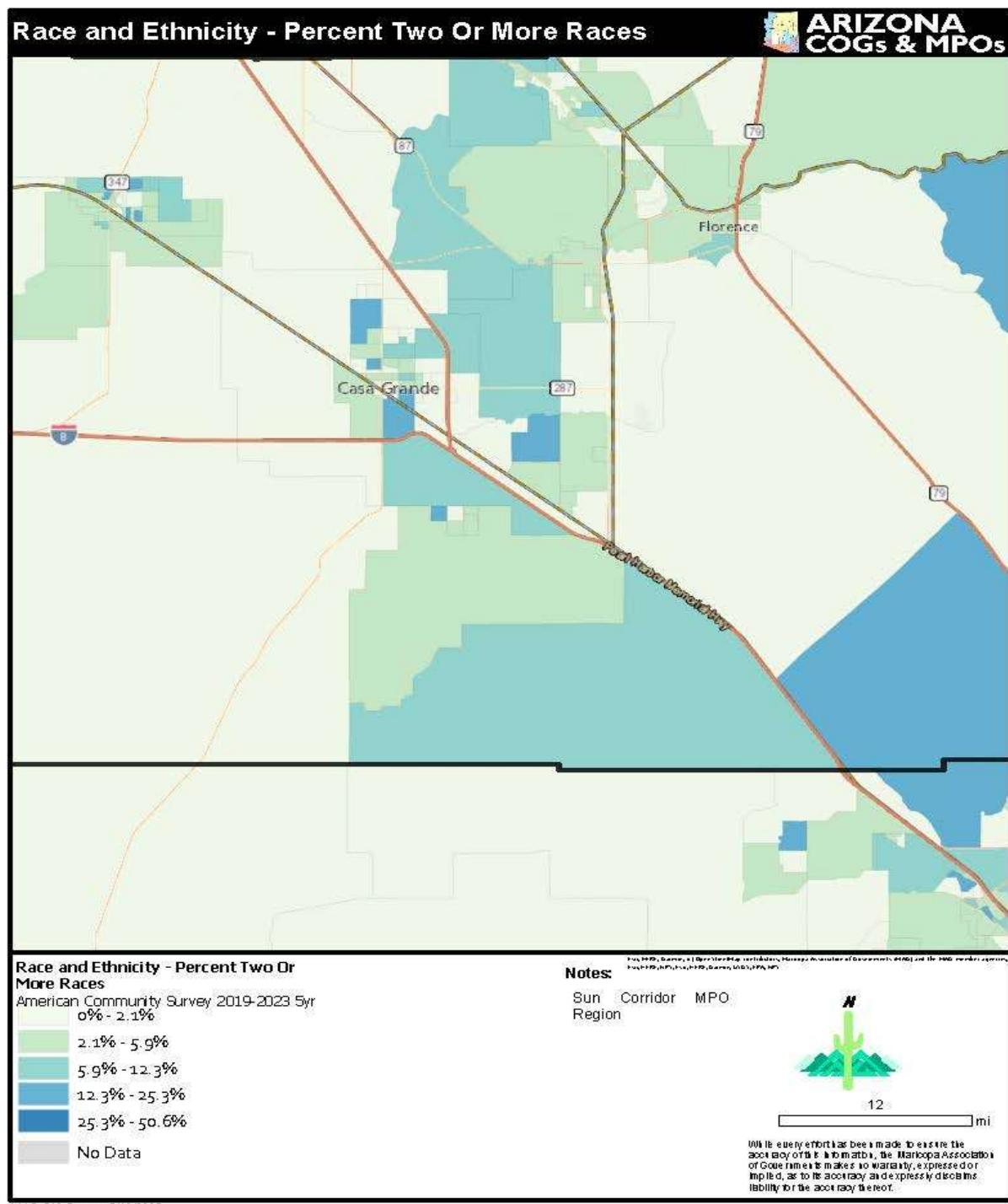
Source: United States Census Bureau, American Community Survey 2019-2023 5 Year Estimates

## Race and Ethnicity - Percent Pacific Islander



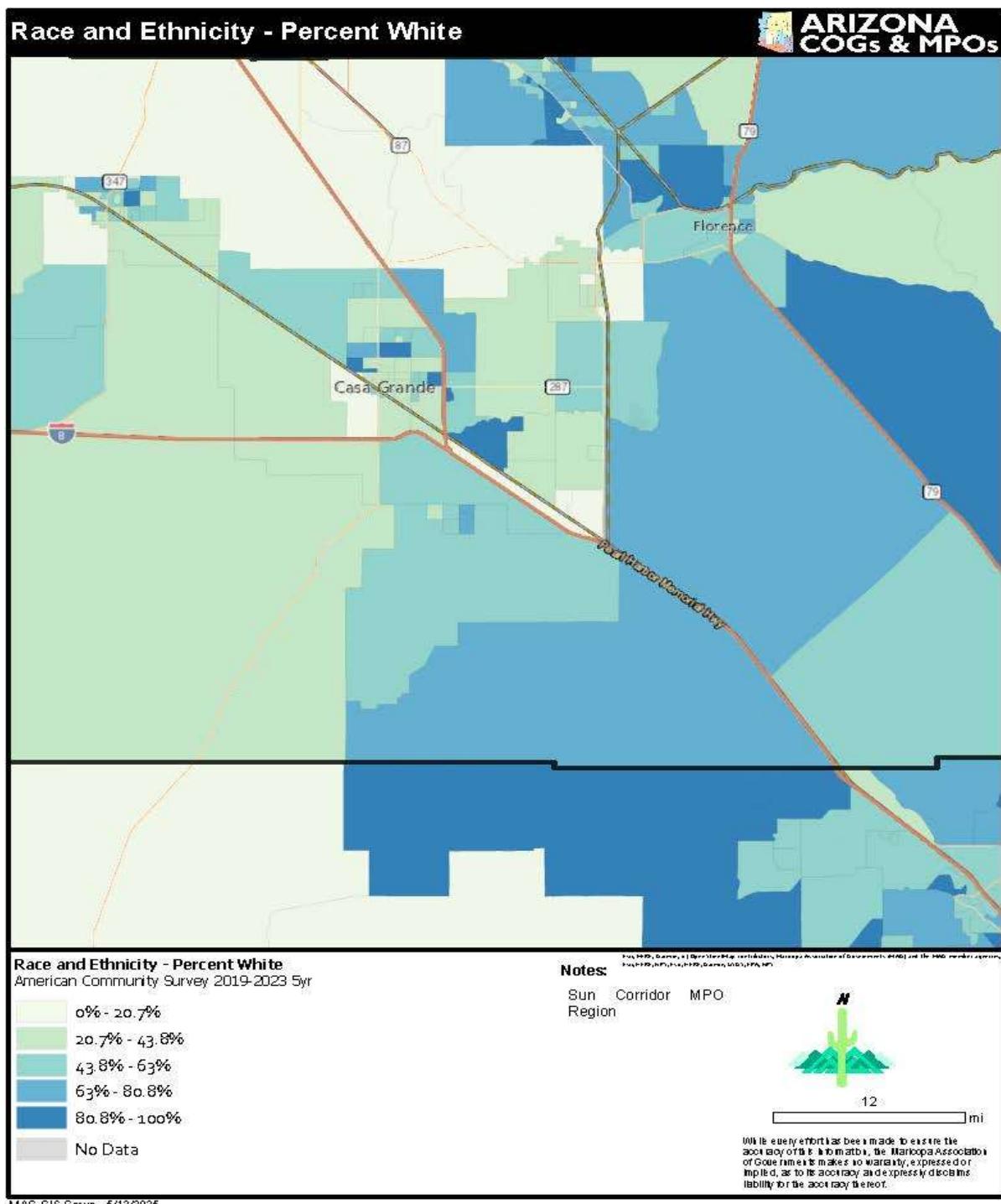
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Race and Ethnicity – Two or More Races



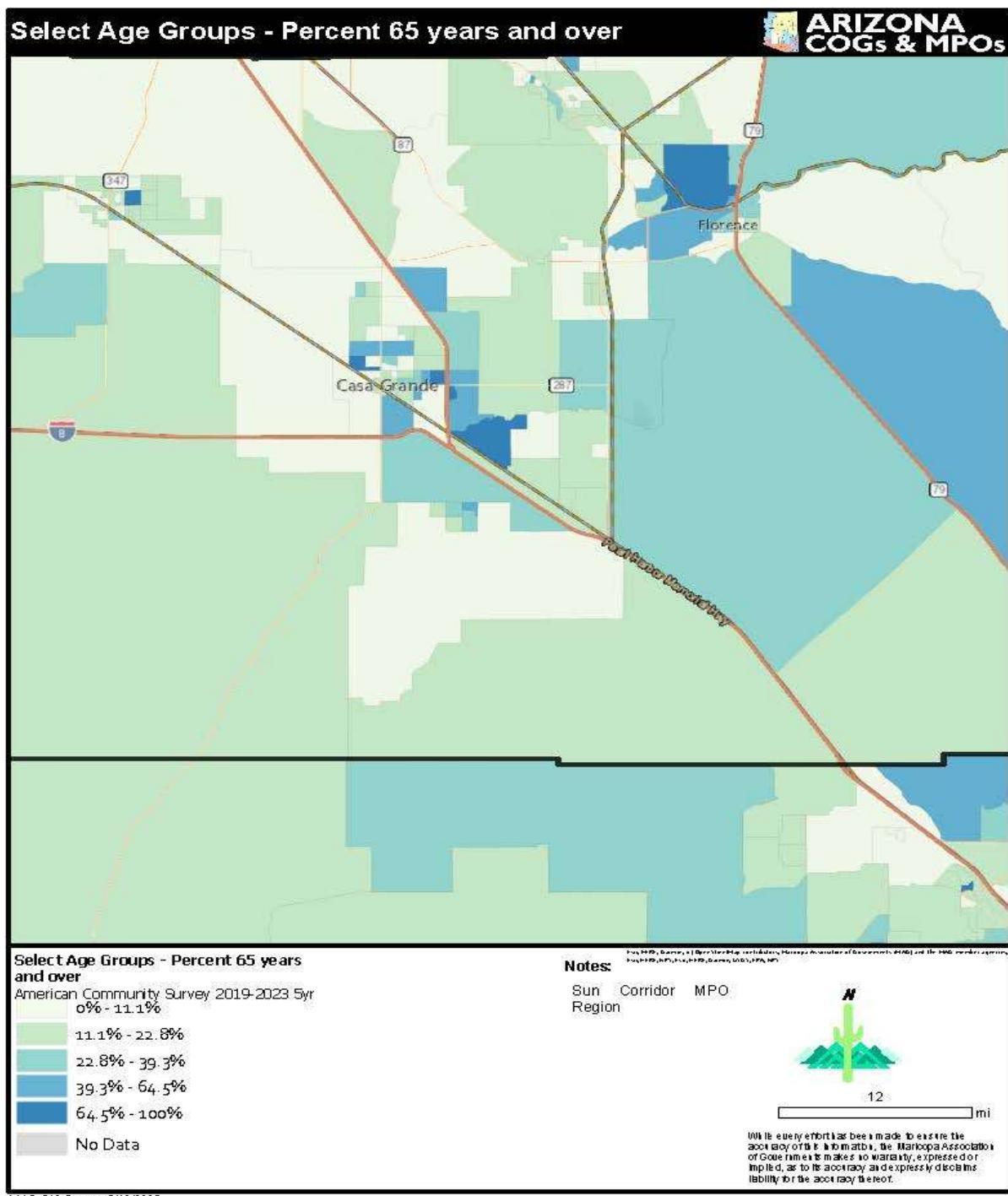
Source: United States Census Bureau, American Community Survey 2019-2023 5 Year Estimates

## Race and Ethnicity – White



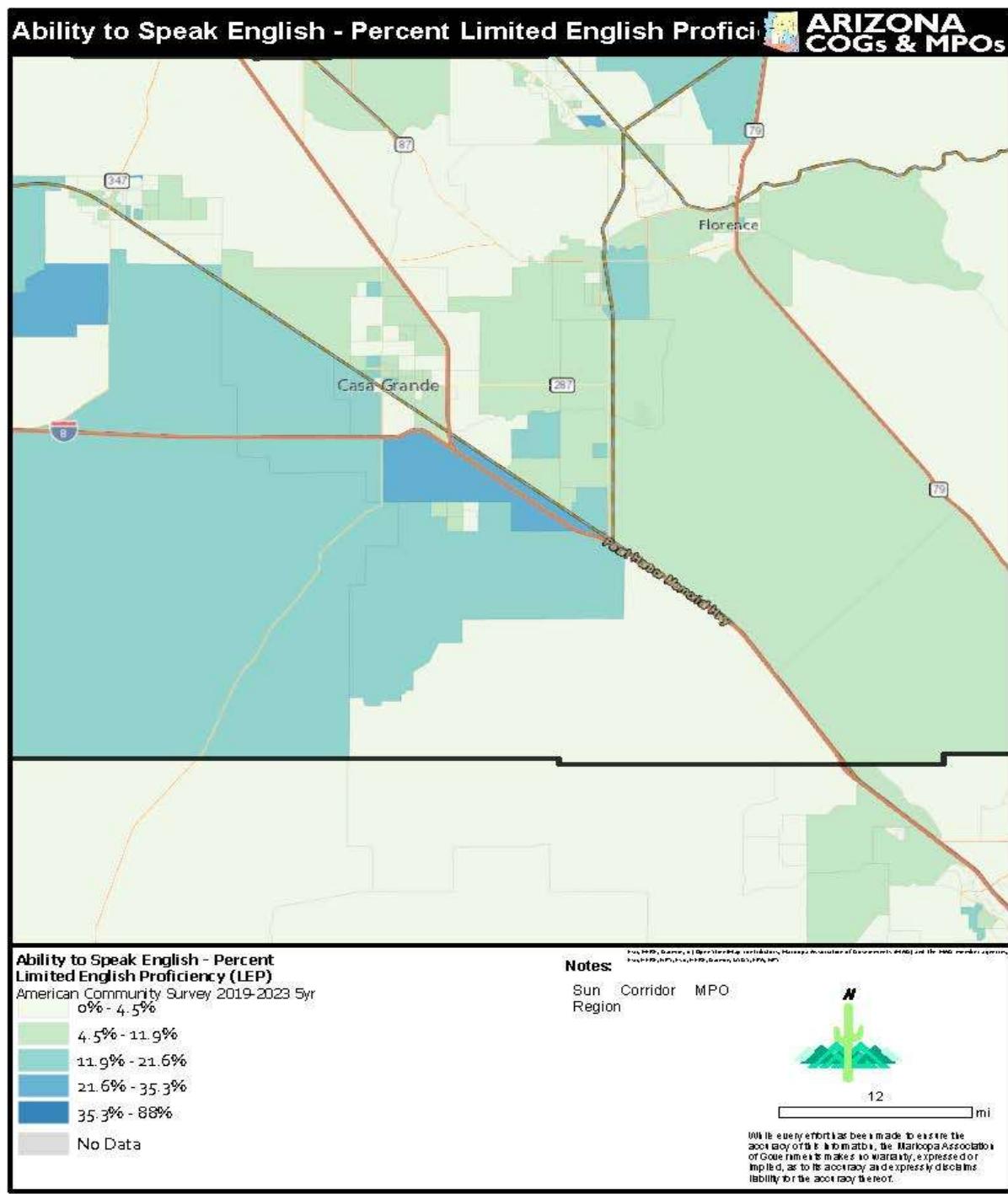
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Select Age Group – Percent 65 years and over



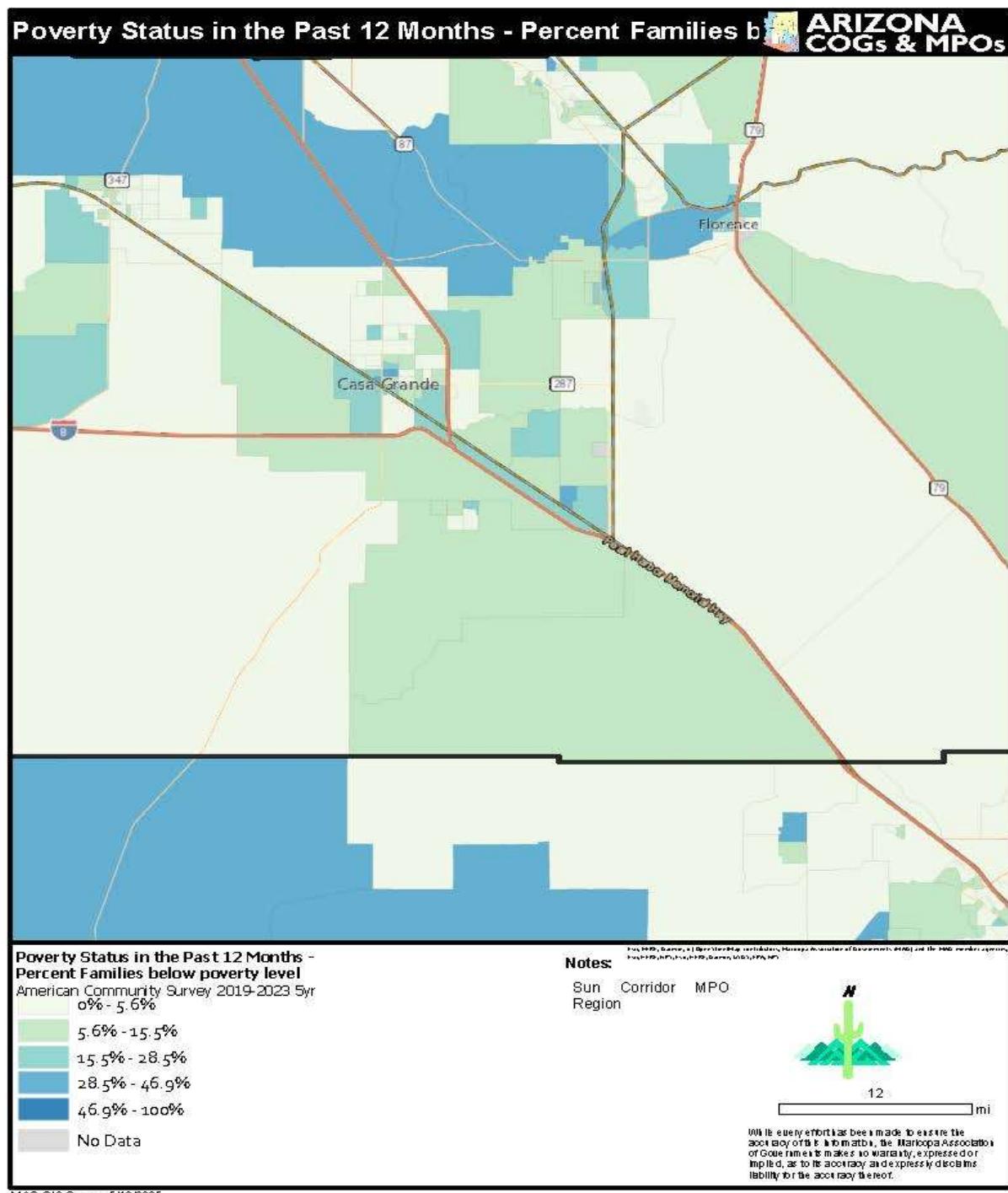
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Ability to Speak English – Percent of Limited English Proficiency (LEP)



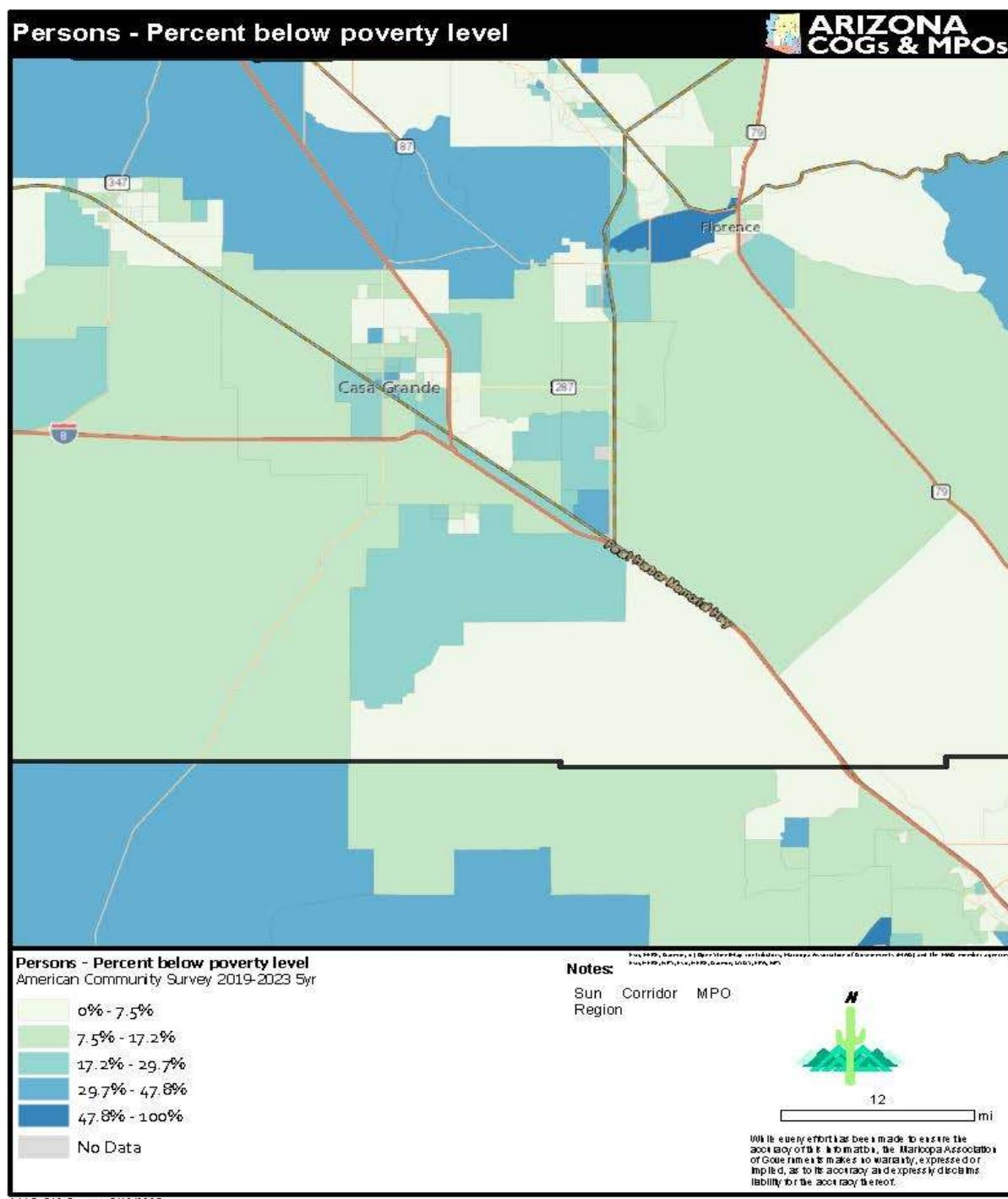
Source: United States Census Bureau, American Community Survey 2019-2023 5 Year Estimates

## Poverty Status in the Past 12 Months – Percent of Families Below Poverty Level



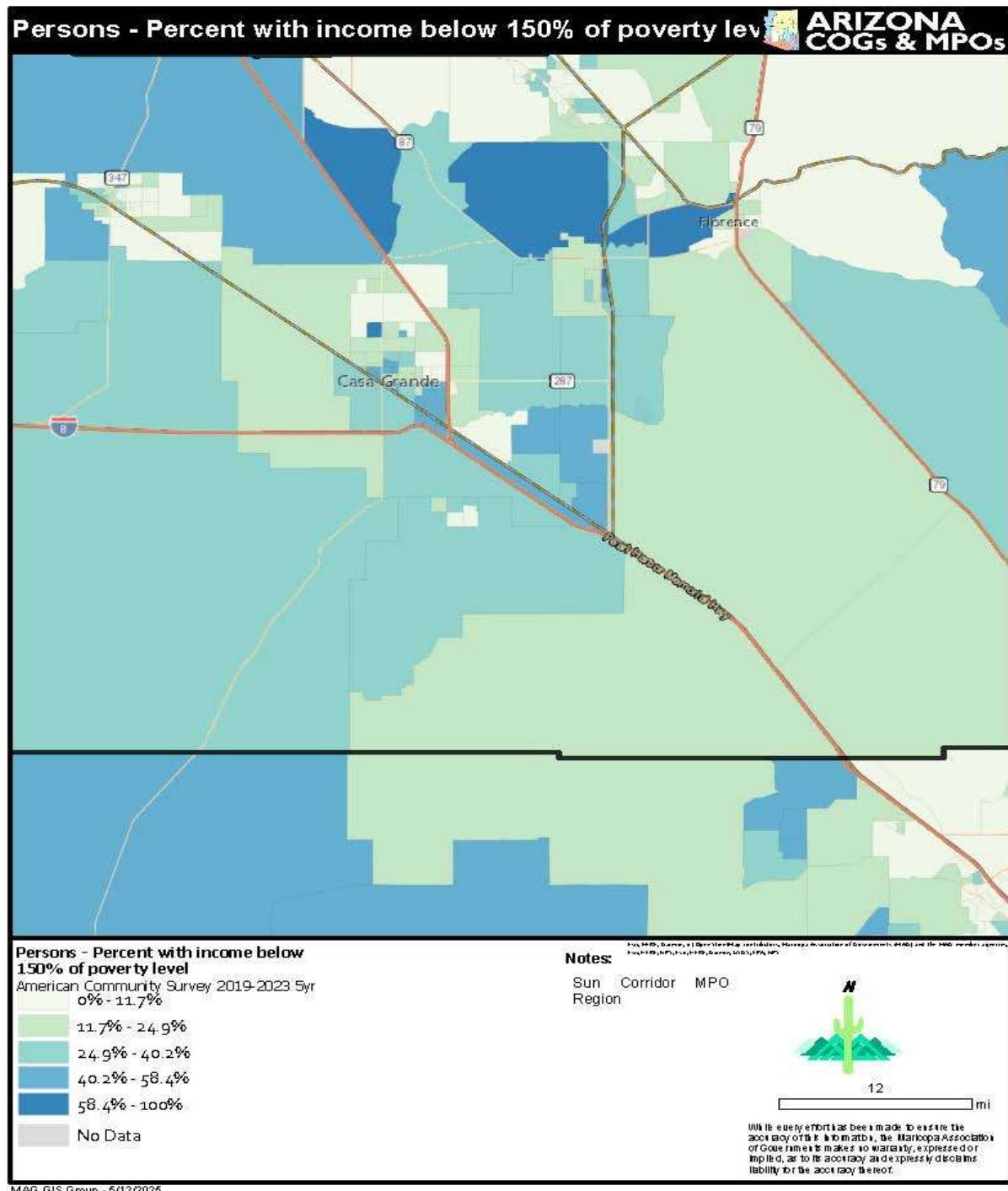
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Persons – Percent Below Poverty Level



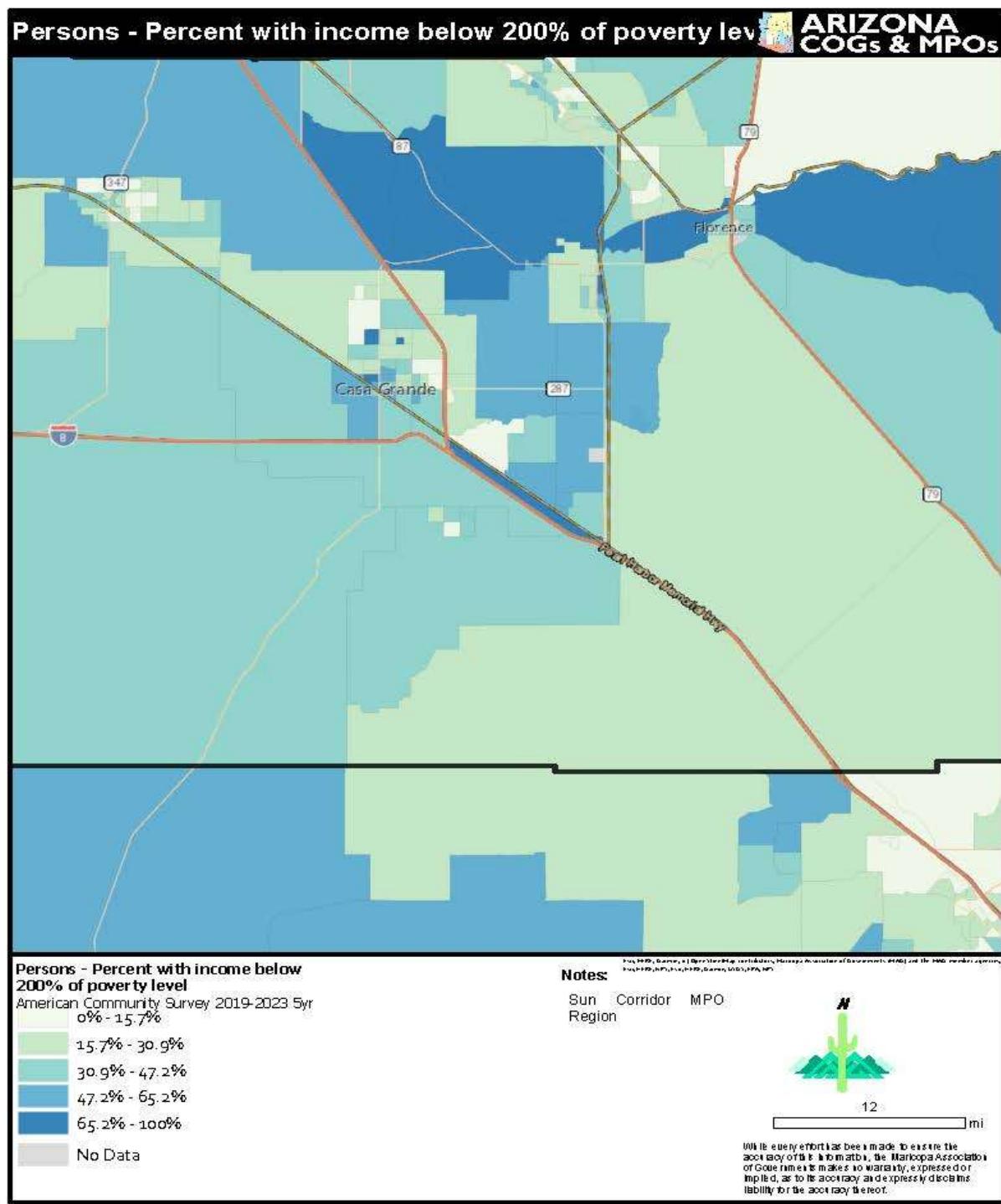
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Persons – Percent with Income Below 150% of Poverty Level



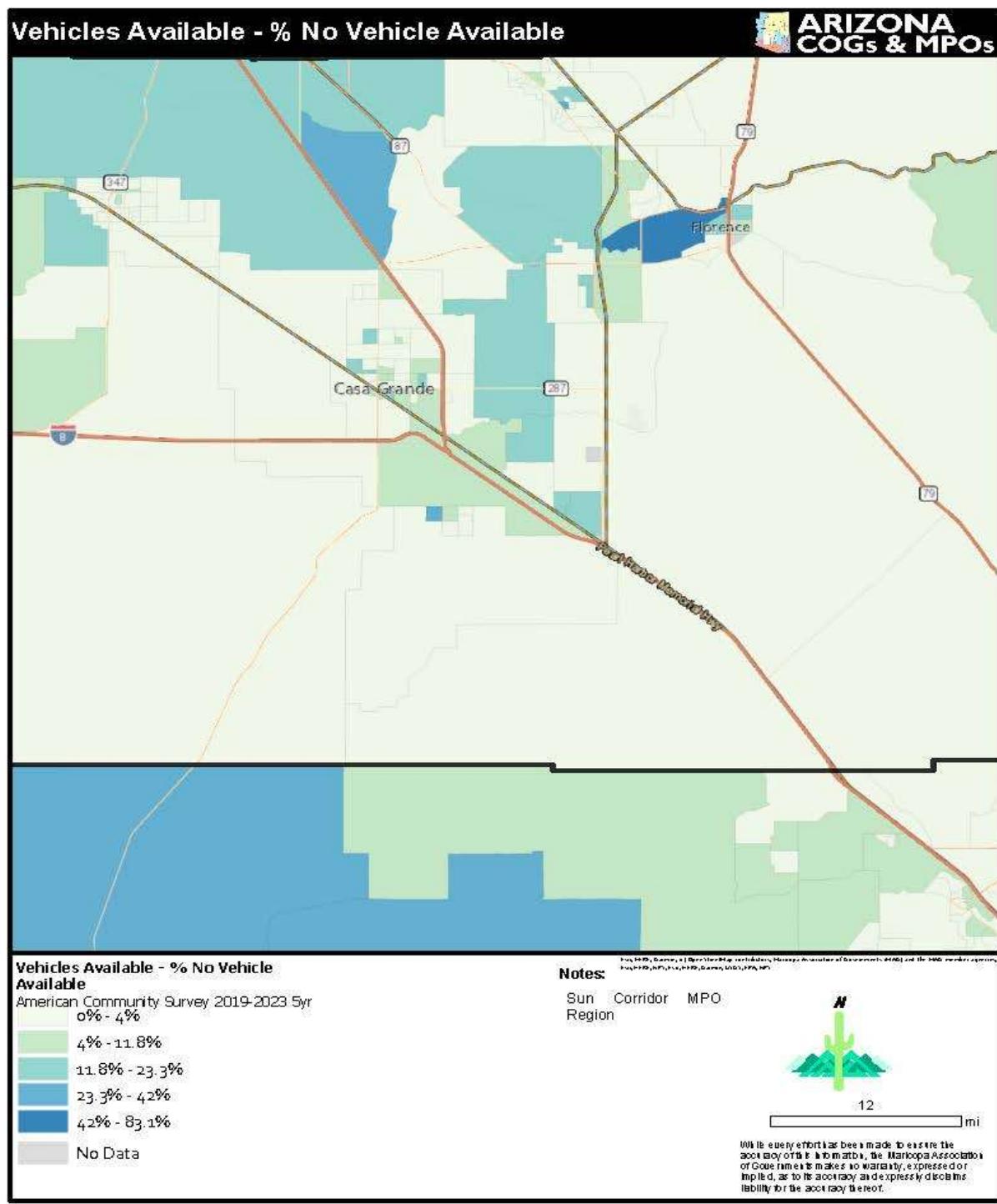
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Persons – Percent with Income Below 200% of Poverty Level



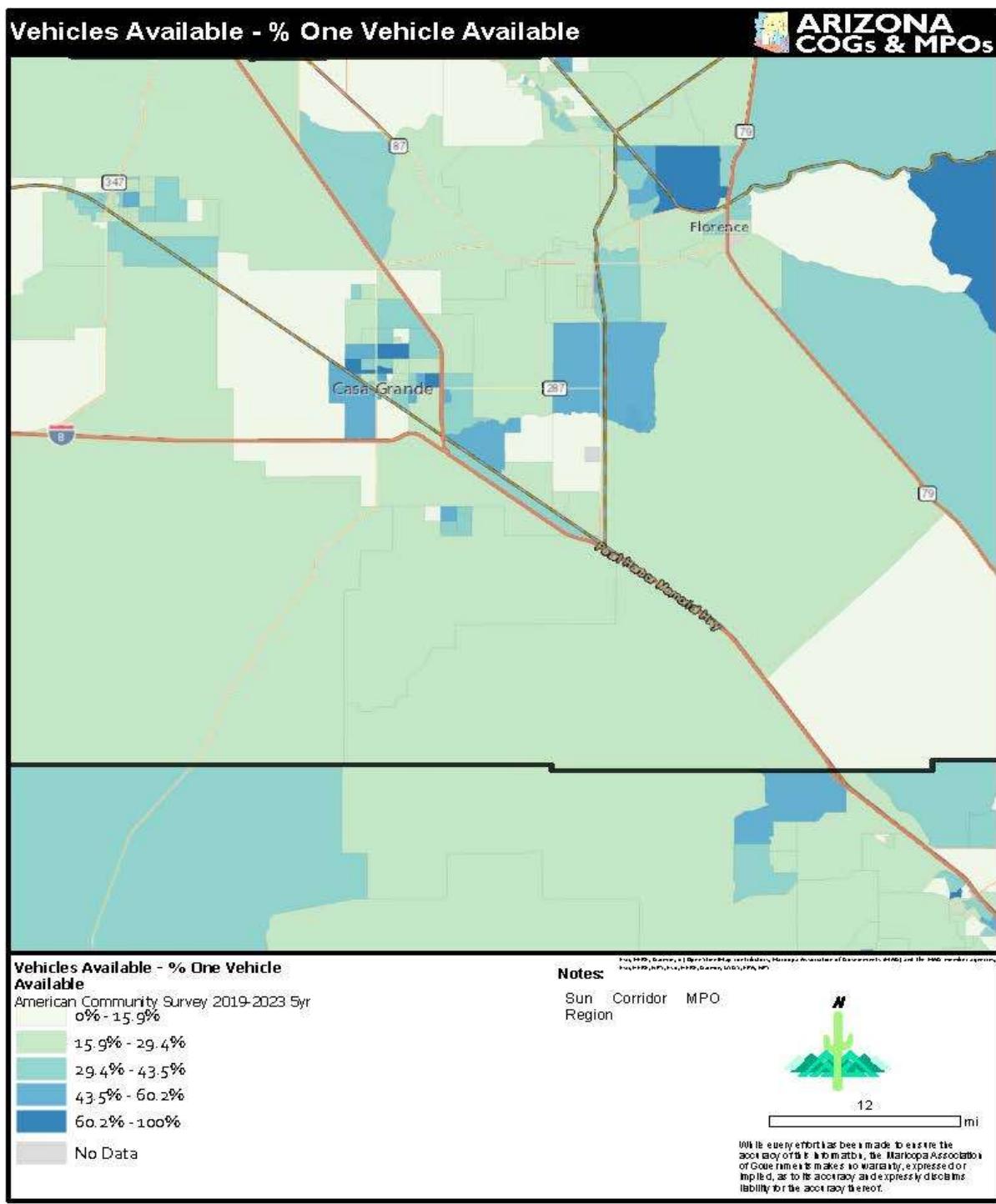
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Vehicles Available – Percent No Vehicle Available



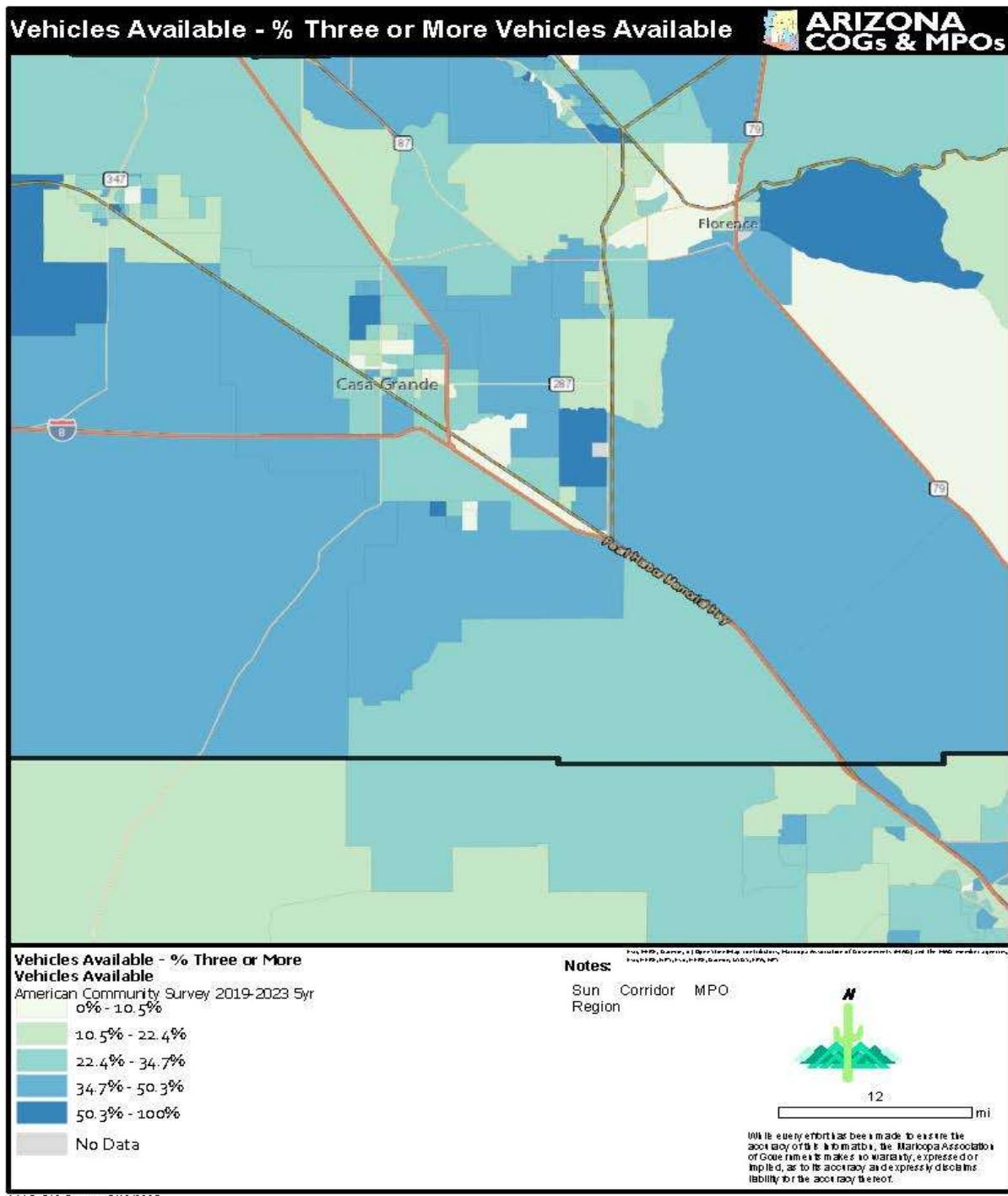
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Vehicles Available – Percent One Vehicle Available



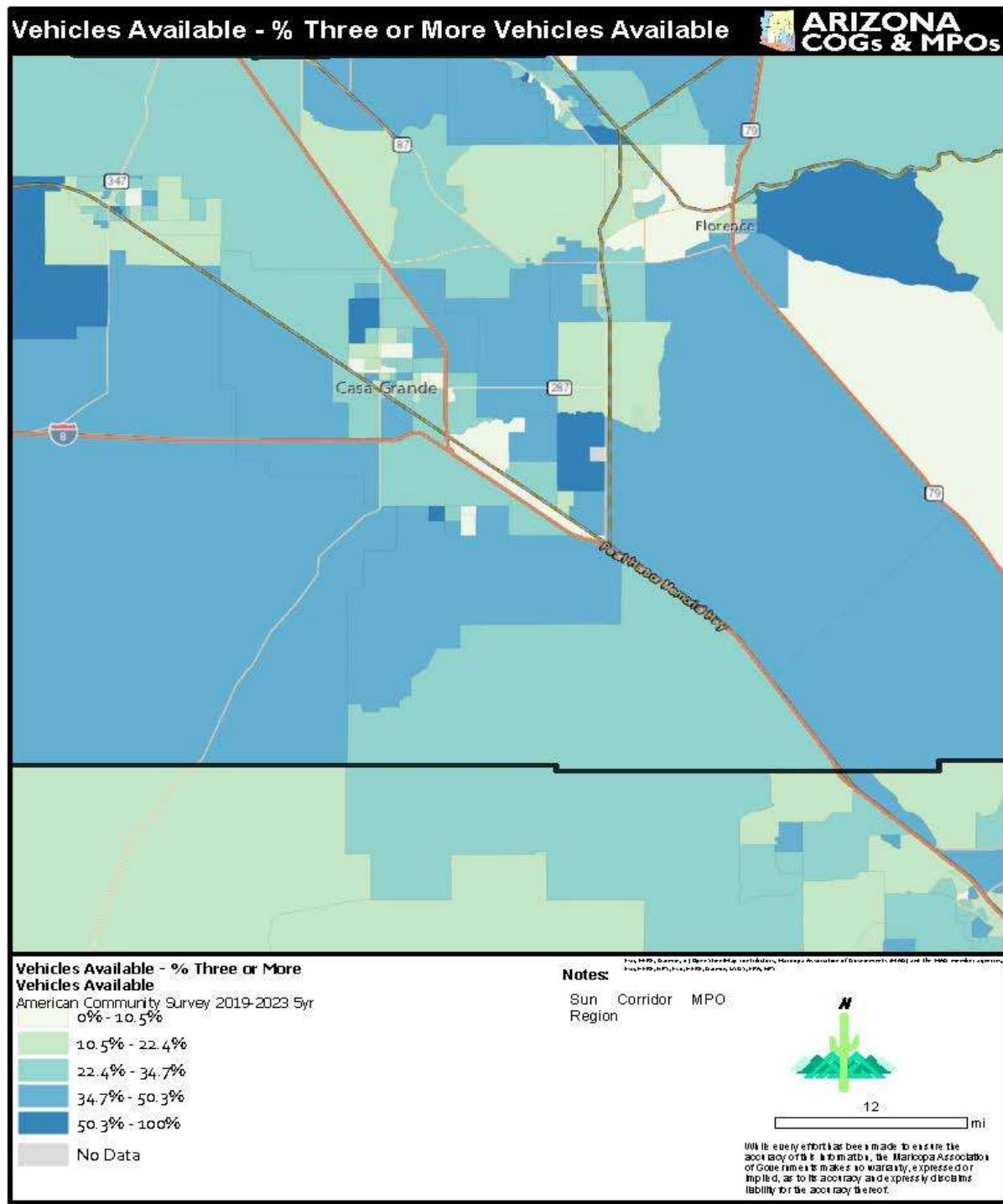
Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Vehicles Available – Percent Two Vehicle Available



Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## Vehicles Available – Percent Three or More Vehicle Available



Source: United States Census Bureau, American Community Survey 2019 -2023 5 Year Estimates

## **Exhibit “C” - Sun Corridor MPO Resolution 2025-02 Approving Plan**