



SIERRA VISTA METROPOLITAN PLANNING ORGANIZATION FY 2019 TITLE VI/EJ ANNUAL REPORT

July 23, 2019

Table of Contents

For More Information/Title VI Coordinator.....	1
Introduction.....	2
Accomplishments: Program Areas.....	2
Assessment and Analysis of Demographic Data.....	3
Sub-Recipient Reviews.....	4
Compliance Review.....	4
Title VI Training.....	4
Complaint Procedures/FY 2019 Complaints.....	6
Goals for FY 2020.....	6

For More Information about SVMPO Title VI and Environmental Justice activities, please contact the SVMPO Title VI Coordinator/SVMPO Administrator, Karen L. Lamberton, AICP. She can be reached at 520-515-8525 or Karen.Lamberton@SierraVistaAZ.gov

The current SVMPO Title VI Plan is available on the SVMPO website at www.svmpto.org

INTRODUCTION

The Sierra Vista Metropolitan Planning Organization, known as the SVMPO, is located in southeastern Arizona and is the Federal and State designated Regional Transportation Planning Organization for the southwestern portion of Cochise County, located in southeast Arizona. The SVMPO receives both Federal Highway Administration and Federal Transit Administration funds through agreements with Arizona Department of Transportation (ADOT).

The SVMPO is committed to ensuring the full participation in regional planning activities by all area residents. This agency has a nondiscrimination policy that addresses Title VI, Environmental Justice and other relevant federal and state statutes. No person, on the grounds of race, color, national origin, gender, age, disability, income status or limited English Proficiency, shall be excluded from participation in, be denied the benefits or, or be otherwise subjected to discrimination under any SVMPO sponsored program of activity. Public outreach and data analysis are two tools used to provide equal opportunity to participate and ensure that equal benefits and disproportionate burdens are assessed during project development.

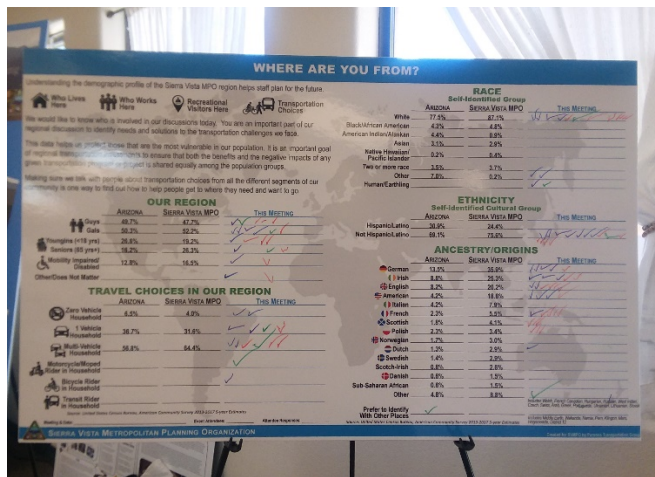
This report sets out the SVMPO activities for Fiscal Year 2019 and goals for Fiscal Year 2020 to ensure that policies and projects are in compliance with Title VI of the Civil Rights Act of 1964 and the 1994 Presidential Executive Order 12898 in accordance with 23 CFR § 200.9(b)(7)(11) and FTA C 4702.1B.

ACCOMPLISHMENTS: Program Areas

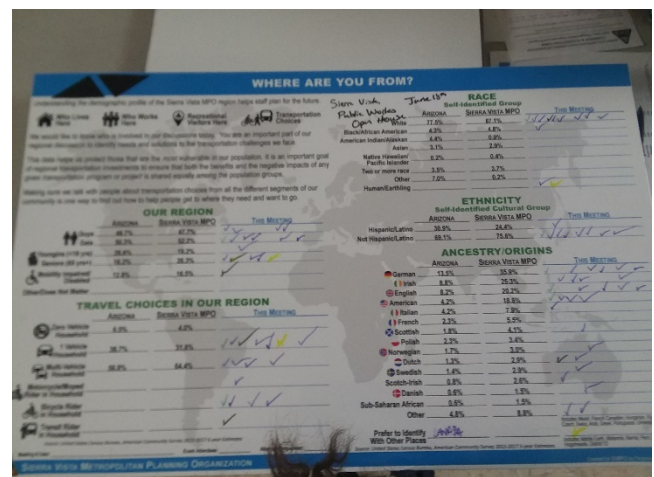
Since the last annual report SVMPO has completed the following Fiscal Year (FY) 2019 accomplishments:

- ✚ Maintained a website presence that provided information regarding any public meetings and provided access to information about Title VI and the Rights of the Public under Title VI, Environmental Justice and Americans with Disabilities Act.
- ✚ Provided access to Title VI Complaint Forms along with contacts for submitting complaints to the SVMPO, Arizona Department of Transportation (ADOT); Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).
- ✚ Held 19 Board and Committee meetings and ensured that meetings rooms were accessible and the opportunity made available for translation, or other accommodations, if needed.
- ✚ Posted the official SVMPO Title VI Notice to the Public at every scheduled meeting.
- ✚ Updated the Title VI process, Complaint Forms and Notice to the Public on the SVMPO website to be in compliance with the June 13, 2018 FHWA guidance memo and August 17, 2018 ADOT directive.
- ✚ Provided language translator option on the SVMPO Website.
- ✚ Identified meeting spaces fully accessible to those with mobility impairments.
- ✚ Obtained demographic data and maps for last year's expanded SVMPO boundaries, approved by the SVMPO Executive Board in January of 2018.

- ✚ Provided an informational bulletin board, displaying Title VI information, immediately outside the SVMPO offices.
- ✚ Engaged the Title VI liaisons with ADOT and FHWA to review and approve an updated Title VI and Public Participation Plan for the expanded SVMPO boundaries.
- ✚ Provided Spanish language materials related to Title VI Rights and provided Spanish language Complaint Forms on the SVMPO website.
- ✚ Provided additional regional funding for public outreach activities in order to encourage additional, proactive outreach to the Spanish speaking community located within the North Garden/Fry Blvd. project area.
- ✚ Conducted outreach, including surveys and formal and informal focus groups, to identify issues of concern for Title VI vulnerable population groups and included these observations in the deliberations of SVMPO committee deliberations and decisions regarding funding investments. The pictures below illustrate the SVMPO's open houses collection of Title VI demographics at both the Town of Huachuca's Library on June 11th and the City of Sierra Vista's Public Works on June 18th. In this one outreach effort, at least 35 people attended three Transportation Improvement Program Open Houses, and 71 percent filled out their responses to the demographic profile questions on these boards.



June 11th Town of Huachuca



June 18th Sierra Vista

ASSESSMENT AND ANALYSIS OF DEMOGRAPHIC DATA

The SVMPO gathers demographic data, specifically related to ethnicity/race but when appropriate also gender, age and income at meetings or public outreach events associated with SVMPO internal program areas. The SVMPO has also developed a standardized visual survey form for use. The SVMPO Title VI Coordinator routinely undertakes the following assessment steps to collect and analyze demographic data trends:

1. Using a variety of survey tools (visual, written, electronic) demographic data, is collected.

2. This data, once collected, is assessed and compared to regional and project area data.
3. An analysis of trends is then completed.
4. Outreach strategies and materials can then be adjusted, if needed, to improve outreach into protected population groups that are not being adequately reached.
5. Recommendations and revised activities/strategies are included in annual Title VI Plan updates, in amendments or updates of the SVMPO Public Participation Plan, and presented to the SVMPO Board and Committees, as relevant and needed.

SUB-RECIPIENT REVIEWS

Each program area and sub-recipient are reviewed by the City of Sierra Vista's (SVMPO's fiscal agent) staff, the SVMPO attorney and the SVMPO Administrator as contracts and planning agreements are developed. These reviews include checking that these contracts and agreements are compliant with required Title VI provisions.

There were no procurement activities and/or contracts issued by the SVMPO in FY19.

The member jurisdictions (City of Sierra Vista, Town of Huachuca City and Cochise County) are responsible to monitor and comply with all sub-recipient requirements, including the non-discrimination assurances committed to by the SVMPO Board. There are no known deficiencies related to non-discrimination requirements by sub-recipients during the FY19 timeframe.

COMPLIANCE REVIEW

ADOT'S Civil Rights Division conducted a Title VI Compliance Review of the SVMPO Title VI activities on February 12, 2019. This Compliance Review focused on SVMPO policies and practices in order to ensure compliance with Title VI of the Civil Rights Act of 1964 and the 1994 Presidential Executive Order 12898 in accordance with 23 CFR § 200.9(b) (7)(11) and FTA C 4702.1B. An Action Plan, in response to recommendations of the review team was developed and transmitted by the SVMPO to ADOT on May 6, 2019. Subsequent review of revised procedures and forms, reflected in FY19 accomplishments, found that the SVMPO was in compliance with Title VI requirements.

TITLE VI TRAINING

The ADOT Title VI Liaisons notify SVMPO of various Title VI training opportunities as they become available. These opportunities are then made known to staff of the member jurisdictions and, when appropriate, to members of the public. The SVMPO Administrator completed 1.5 certification credits in FY19 related to Ethics and the Digital World that included a section on the impact both positive and negative on vulnerable population groups of conducting outreach using digital technology. She also participated in four other meetings and/or webinars on Title VI topics.

Formal Title VI training was held for the SVMPO Executive Board and both the Technical Advisory and the Bicycle and Pedestrian Advisory Committees. The audience for these trainings were regional committee members from all three member jurisdictions: a total of 23 individuals attended these five trainings.

These trainings included information about how a member of the public could formally present a complaint and what the process was to respond to such a complaint, if received. It also include

information about the adopted Title VI plans, the Census Tracts that met the thresholds for requirements related to Spanish language materials, and discussed maps illustrating demographic profiles for the SVMPO region. The final FY20 Title VI plan was provided to all committee members and made available on the SVMPO Website.

FY19 Title VI TRAINING					
Name/Title	Month, Day & Year	Type of Training	Provided By	Cost	Comments
Staff					
1) Karen Lamberton/SVMPO Administrator	12-12-2018	Webinar: Transforming Public Apathy to Revitalize Engagement	MetroQuest	-	ADOT PHX Office
2) Karen Lamberton/SVMPO Administrator	12-14-2018	COG/MPO Planners Meeting: Title VI Training: General Compliance Review	ADOT Civil Rights Dept.	-	MAG Offices/Afrika McKinnon
3) Karen Lamberton/SVMPO Administrator	11-13-2018	WebEx: FHWA/FTA Title VI Implementation Plan	ADOT Civil Rights Dept.	-	Joanna Lucero, ADOT CRO, Civil Rights Specialist
4) Caterina Porter/SVMPO Transportation Planner Intern – BYU-I	2-11-2019	New staff orientation, Review of Title VI Plan and requirements for outreach	K.Lamberton/SVMPO Administrator	-	Start date 2-11-2019
4) Karen Lamberton/SVMPO Administrator	4-27-2019	Webinar: APA Ethics and the Digital World	American Planning Association	\$30.00	1.5 Continuing Education Credits
5) Karen Lamberton/SVMPO Administrator	6-7-2019	COG/MPO Planners Meeting: Title VI Onsite Compliance Reviews – Lessons Learned	ADOT Civil Rights Dept.	-	Jose Alarcon, ADOT CRO, Title VI Program Manager
Boards & Committees					
1) Technical Advisory Committee: FY 19 Title VI Plan	11-1-2018	Discussion of FY19 Title VI Plan and expanded boundary Title VI and ADA Maps	K.Lamberton SVMPO Administrator	-	7 attendees
2) Executive Board: FY19 Title VI Plan	11-15-2018	Discussion and Adoption of FY19 Title VI Plan and expanded boundary Title VI and ADA Maps	K.Lamberton SVMPO Administrator	-	Adoption of FY19 Title VI Plan 10 attendees
3) Bicycle & Pedestrian Advisory Committee	2-25-2019	Discussion of FY19 Title VI Plan, compliance review findings and Complaint Procedure Training	K.Lamberton SVMPO Administrator	-	5 attendees
4) Technical Advisory Committee: Title VI Plan Update	3-5-2019	Discussion of the FY20 Title VI Plan update, compliance review findings and Complaint Procedure Training	K.Lamberton SVMPO Administrator	-	10 attendees
5) Executive Board: FY20 Title VI Plan	3-19-2019	Discussion and adoption of the FY20 Title VI Plan, LEP Census Tracts and Safe Harbor analysis discussed.	K.Lamberton SVMPO Administrator	-	Adoption of FY20 Title VI Plan 5 attendees
7) Executive Board: Compliance Review and Training	6-27-2019	Discussion of both the FY19 and FY20 Title VI Plan, compliance review update, training on the Complaint Procedures and collection of demographic profiles at meetings.	K.Lamberton SVMPO Administrator	-	7 attendees
Others					
1) Sierra Vista Public Works Front Desk staff	2-13-2019	Provided Title VI Complaint Forms and Complaint Procedure Information/Training to front desk receptionists	K.Lamberton SVMPO Administrator	-	

Report to be Submitted Annually to ADOT Title VI Department

COMPLAINT PROCEDURES/FY19 Complaints

Complaint Forms in both English and Spanish, along with the Complaint Procedures, Title VI Coordinator contact information and the Title VI Notice to the Public are available at the SVMPO offices and the SVMPO website.

During FY19, no formal Title VI or Environmental Justice complaints were filed with the SVMPO.

Title VI Complaints, Investigations and Lawsuits: FY 19 Log					
Description/Name	Date Month, Day & Year	Funding Source (FHWA or FTA)	Summary (Basis of Complaint)*	Status	Actions / Final Findings
Complaints					
1)					
2)					
Investigations					
1)					
2)					
Lawsuits					
1)					
2)					

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

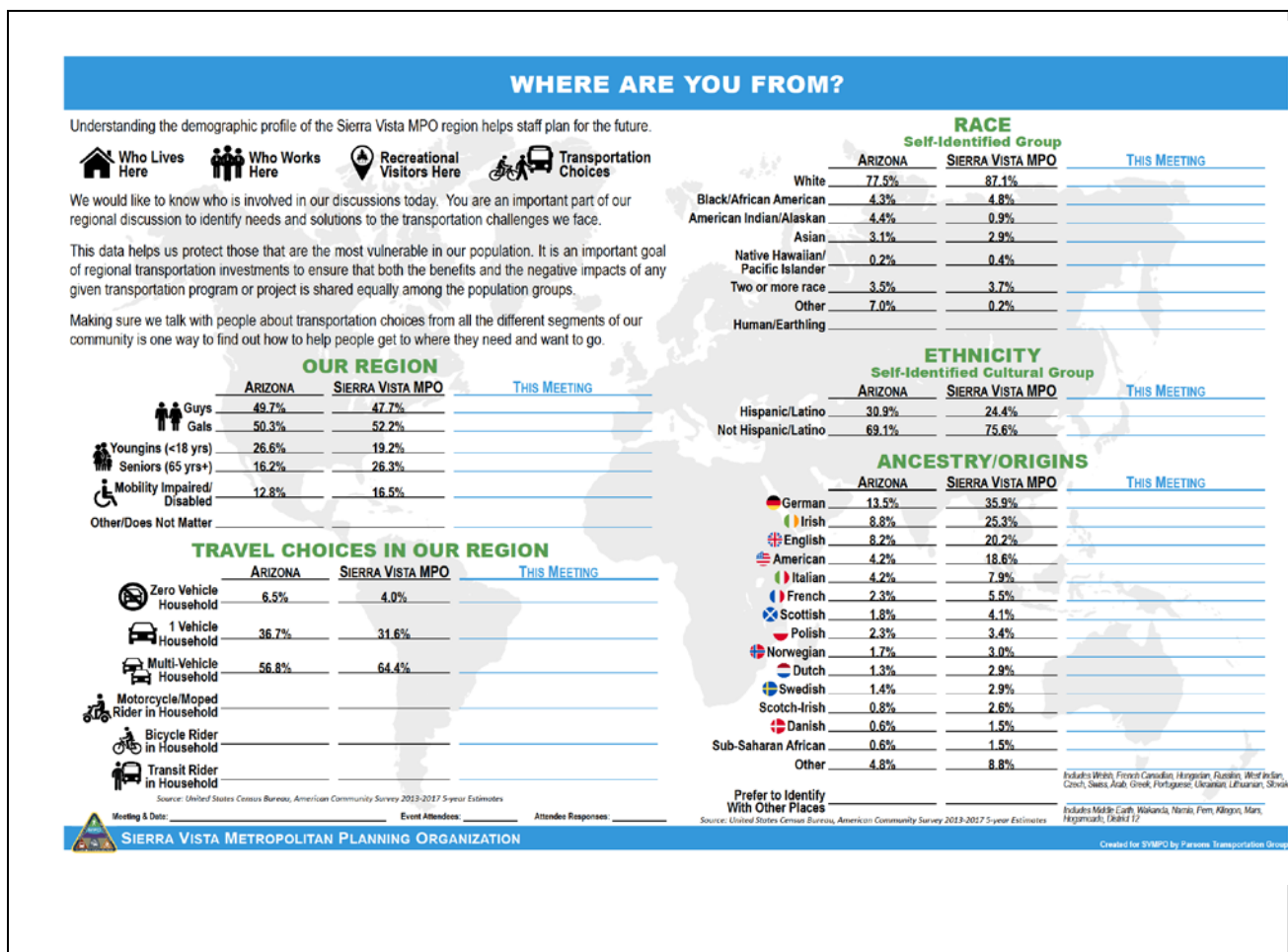
Report to be Submitted Annually to ADOT Title VI Department; a NIL Report is Required

GOALS FOR FY 2020

The SVMPO has identified the following goals to ensure compliance with Title VI, Environmental Justice and related authorities in FY20. These goals were developed by the Title VI Coordinator/SVMPO Administrator and reviewed by ADOT's Civil Rights Office.

- ✚ Document and address any submitted complaints received and promptly notify ADOT, and as appropriate, FHWA and FTA Civil Rights Offices, of the received complaint and any resolution reached.
- ✚ Fully and effectively respond to any requests for Limited English Proficiency services, translation requests, and special accommodations needed to engage communities of concern in the SVMPO's regional planning area.
- ✚ During any update or amendment of the adopted Unified Work Program, review program areas for compliance with applicable Title VI requirements.
- ✚ The SVMPO Administrator will make reasonable efforts to attend Title VI, Environmental Justice and ADA subject matter trainings and share those opportunities, and information learned, with member jurisdiction staff and committee members.
- ✚ The SVMPO Administrator will provide Title VI training opportunities to any staff hired for the SVMPO, and to external partners, either during regularly scheduled meetings or through conferences, seminars or other opportunities to enhance regional knowledge on Title VI requirements and best practices.
- ✚ The SVMPO will complete the development of standard templates for all SVMPO procurement activities, ensuring the documentation of non-discrimination policies in the solicitation, selection and contracting for professional services and vendors.

- ✚ Continue to research best practices on conducting public outreach to protected population groups and develop innovative ways to identify profiles of public meeting attendees.
- ✚ Develop targeted strategies for outreach to protected groups for the FY20/FY21 Long-Range Transportation Plan process, ensure inclusion of outreach activities in consultant contract(s) and adequately fund these strategies, as reasonable and appropriate.
- ✚ Update and transmit a SVMPO Executive Board adopted FY21 Title VI and EJ Report to ADOT Civil Rights Division by June 20, 2020.
- ✚ Provide an FY20 Annual Title VI report to ADOT Civil Rights Division by August 1st, 2020.



Example of a Demographic Profile Outreach Tool with State and SVMPO Region Data

Developed June 2019