



**City of Flagstaff**  
**Title VI Implementation Plan**  
**Relating to U.S Department of Transportation (DOT),**  
**Federal Highway Administration (FHWA), and Federal**  
**Transit Administration (FTA) Funds**  
**2025**

**211 W. Aspen Avenue**  
**Flagstaff, AZ 86001**  
**Phone: 928-213-2078**  
**Website: [www.flagstaff.az.gov](http://www.flagstaff.az.gov)**

**FEDERAL HIGHWAY ADMINISTRATION (FHWA)/FEDERAL TRANSIT  
ADMINISTRATION (FTA) TITLE VI PLAN  
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## Executive Summary

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, subrecipients, and contractors whether those programs and activities are federally funded or not.

Recipients of public transportation funding from FHWA/FTA and the Metropolitan Washington Council of Governments ("COG") are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI. This document details how the City of Flagstaff, Arizona, incorporates nondiscrimination policies and practices in providing services to the public.

### **What type of program fund(s) did you apply for?**

- 5310
- 5311
- Other (please explain) 5305, FHWA funds

### **Type of Funding Requests? (Check all that apply)**

- Vehicle Funds
- Operating Funds
- Other (please explain) \_\_\_\_\_

### **Is your agency receiving direct funds from FHWA/FTA?**

- If yes, please attach a copy of your FHWA/FTA letter of approval of Title VI Plan.
- No

## **Title VI Policy Statement**

The City of Flagstaff, Arizona (the “City”), operates its programs and services without regard to race, color, national origin, or disability in accordance with the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). The City assures that no person shall on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives U.S. Department of Transportation (DOT) funding. Title VI also prohibits retaliation for asserting or otherwise participating in claims of discrimination.

The City further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not.

As a subrecipient of federal funding, the City is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice per 28 Code of Federal Regulations (CFR) § 42.401 et seq. and 28 CFR § 50.3. Should the City distribute federal funds to another entity/person, it will ensure all subrecipients fully comply with the City’s Title VI Nondiscrimination Policy requirements.

The City of Flagstaff Civil Rights Office will serve as the City’s Title VI Coordinator to oversee and implement non-airport-related FHWA/FTA Title VI requirements.

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Greg Clifton, City Manager

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Date

## **Notification to the Public**

Notice to the public, notifying their protection under Title VI, has been posted on the City of Flagstaff's website, [www.flagstaff.az.gov](http://www.flagstaff.az.gov), and in the City of Flagstaff Human Resources office located in City Hall at 211 W. Aspen Avenue, Flagstaff, AZ, 86001 in both English and Spanish. Copies of the notification are provided in Appendix A.

## City of Flagstaff Title VI Complaint Procedures

The following 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 Department of Transportation FHWA/FTA program or activity administered by the City of Flagstaff, 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.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been excluded from, denied the benefits of, or subjected to discrimination by the City in relation to any program or activity administered by the City or its subrecipients, consultants, or contractors on the basis of race, color, national origin, sex, age, or disability may file a written complaint with the Title VI Coordinator.

Required procedures for FHWA/FTA Title VI Complaints filed against the City of Flagstaff:

1. 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.
2. The complaint shall be in writing and signed by the complainant(s). In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the complainant or his/her representative.
3. The 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., agency/organization) alleged to have discriminated;
  - e. Sufficient information to understand the facts that led complainant to believe that discrimination occurred in a City of Flagstaff program or activity that receives Federal Highway Administration and/or Federal Transit Administration financial assistance; and
  - f. The date(s) of the alleged discriminatory act(s).
4. Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
5. A complaint must meet the following criteria for acceptance:
  - a. The complaint must be filed within 180 days of the alleged occurrence.
  - b. The allegation must involve a covered basis such as race, color, national origin, sex, age, or disability.
  - c. The allegation must involve a City of Flagstaff program or activity, as a federal aid recipient; or its subrecipient or contractor.
6. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.

- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The complainant cannot be located after reasonable attempts.
- 7. The complainant will be provided with a written acknowledgement that the City has either accepted or rejected the complaint. If accepted, the complaint will be recorded identifying: complainant's name, basis, alleged harm, race, color, sex, age, and/or disability of the complainant.
- 8. An investigative report will be conducted within 90 calendar days of the accepted complaint by the Title VI Coordinator and Legal Counsel. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
- 9. The Title VI Coordinator/Legal Counsel will make a determination on the disposition of the complaint and issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was no finding of discrimination and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member, or other action will occur.
- 10. Notice of the determination will be mailed to the complainant. The notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Notices of appeals are as follows:
  - a. The Title VI Coordinator will reconsider the determination if new facts come to light.
  - b. If complainant is dissatisfied with the determination and/or resolution set forth by the Title VI Coordinator, the same complaint may be submitted to the appropriate federal agency for investigation. Contact information including agency name, telephone number, address, and website pertaining to the appropriate federal agency will be disclosed.
- 11. A copy of the complaint and the Title VI Coordinator's investigation report and closure letter or letter of finding will be issued to ADOT and the FHWA/FTA within 120 days of the receipt of the complaint.
- 12. A summary of the complaint and its resolution will be included as part of the City of Flagstaff's Title VI annual updates.
- 13. The complainant may also file a discrimination-related complaint on an FHWA/FTA program or activity directly with ADOT or with the Federal Highway Administration/Federal Transit Administration by contacting the agencies at:

ADOT Civil Rights Office  
 206 S. 17th Avenue, Mail Drop 155-A  
 Phoenix, AZ 85007  
 602.712.8946  
 602.239.6257 FAX  
 Email [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov)

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 [CivilRights.FHWA@dot.gov](mailto:CivilRights.FHWA@dot.gov)

## City of Flagstaff Title VI Complaint Form

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape	
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other	
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <b>Section III</b>.</i>			
If not, please supply the name and relationship of the person for whom you are complaining.			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Disability
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____			
_____			
_____			
_____			
<b>Section VI:</b>			
Have you previously filed a discrimination complaint with this agency?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint.			
_____			
_____			

<b>Section V:</b>	
Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> State Court : _____	<input type="checkbox"/> Local Agency: _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
<b>Section VI:</b>	
Name of agency complaint is against:	
Name of person complaint is against:	
Title:	
Location:	
Telephone Number (if available):	

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below:

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

**Please submit this form in person at the address below, or mail this form to:**

City of Flagstaff  
 Civil Rights Office  
 211 W. Aspen Ave, Flagstaff AZ 86001  
 928-213-2078  
[chris.rhode@flagstaffaz.gov](mailto:chris.rhode@flagstaffaz.gov)

A copy of this form can be found online at <https://www.flagstaff.az.gov/>

If information is needed in another language contact: The Civil Rights Office at (928) 213-2078.

\* Para información en Español llame: 928-213-2078.

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

The City of Flagstaff has not had any ADA or Title VI Discrimination complaints, investigations, or lawsuits in 2024.

## **Public Participation Plan**

The City of Flagstaff is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

**As an agency receiving federal financial assistance, City of Flagstaff made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.**

- Posted the Nondiscrimination Public Notices to the following locations:
  - Within transportation vehicles
  - Pick up and drop off stations
  - Lobby of agency
- Added public interactive content to the agency's webpage for the public, e.g., social media, to communicate schedule changes or activities: <https://flagstaff.az.gov/2850/Civil-Rights>
- Updated agency documents/publications to make them more user-friendly, e.g., comment forms or agency brochures

**The City of Flagstaff will make the following community outreach efforts for the upcoming year:**

- Expand the distribution of agency brochures
- Post the Nondiscrimination Public Notices to the following locations:
  - Lobby of agency
- Update agency documents/publications to make them more user-friendly, e.g., comment forms or agency brochures.
- List other: Community outreach may be facilitated through handouts provided in lobbies of City facilities, brochures available in City breakrooms, notices posted in areas of reasonable foot traffic in City facilities, and through recruitment events.

## **Limited English Proficiency Plan**

The City of Flagstaff has developed the Limited English Proficiency Plan (LEP Plan) attached as Appendix C to help identify reasonable steps to provide language assistance for Limited English Proficiency (LEP) persons seeking meaningful access to City of Flagstaff services. An LEP person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

The City's plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, and notification to LEP persons that assistance is available.

## **Non-Elected Committees Membership Table**

Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

City of Flagstaff does **not** select the membership of any transit-related committees, planning boards, or advisory councils.

## **Monitoring for Subrecipient Title VI Compliance**

Describe how you monitor your subrecipients. This can be through site visits, submissions of Title VI Plans annually, or training and surveys.

City of Flagstaff does **not** monitor subrecipients for Title VI compliance as it does not have any FTA subrecipients.

## **Title VI Equity Analysis**

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin against any person who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FHWA/FTA funds, if the subrecipient organization receives any FHWA/FTA dollars, it must comply with this requirement.

City of Flagstaff has no current or anticipated plans to develop new transit facilities covered by these requirements.

## **Fixed Route Transit Provider Analysis**

Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Federal Transit Administration (FTA) Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see FTA Title VI Circular 4702.1B, Appendix G & H, pp. 87-91)

City of Flagstaff is **not** a Fixed Route Transit Provider.

**Council Adoption of Title VI Plan**

[Resolution to be attached after adoption]

**Appendix A**  
Title VI Notice to the Public



# CITY OF FLAGSTAFF

## **City of Flagstaff Title VI Nondiscrimination Notice to the Public**

The City of Flagstaff hereby gives public notice that it is the City's policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and other related statutes and regulations including Title II of the ADA. The City of Flagstaff operates without regard to race, color, national origin, income status, sex, age, limited English proficiency (LEP), or disability and that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Any person who believes their Title VI rights have been violated, may file a complaint. Any such complaint must be in writing and filed with the City of Flagstaff's Civil Rights Office within ninety (90) days following the date of the alleged discriminatory occurrence.

For additional information about the City of Flagstaff's Civil Rights Program and the procedures to file a complaint, please visit: <https://www.flagstaff.az.gov/2850/Civil-Rights>.

## **Aviso al Público sobre la No Discriminación del Título VI de la Ciudad de Flagstaff**

La Ciudad de Flagstaff notifica públicamente que es política de la Ciudad asegurar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964 y otras leyes y reglamentos relacionados, incluyendo el Título II de la ADA. La Ciudad de Flagstaff opera sin importar raza, color, origen nacional, situación económica, sexo, edad, dominio limitado del inglés (LEP) o discapacidad, y que ninguna persona será excluida de participar, se le negarán los beneficios ni será objeto de discriminación en ningún programa o actividad.

Cualquier persona que considere que se han violado sus derechos amparados por el Título VI puede presentar una queja. Dicha queja debe presentarse por escrito ante la Oficina de Derechos Civiles de la Ciudad de Flagstaff dentro de los noventa (90) días posteriores a la fecha del presunto incidente discriminatorio.

Para obtener más información sobre el Programa de Derechos Civiles de la Ciudad de Flagstaff y los procedimientos para presentar una queja, visite: <https://www.flagstaff.az.gov/2850/Civil-Rights>.

**Appendix B**  
Signed Title VI Policy Statement

**Appendix C**  
Limited English Proficiency Plan



# CITY OF FLAGSTAFF

## Purpose

The City of Flagstaff (COF) is a recipient of federal funds, and therefore required to comply with Executive Order 13166. On August 11, 2000, [Executive Order 13166](#) was implemented to clarify existing Title VI responsibilities for entities that receive federal funds. The goal of the order is to improve access to federal programs and activities for persons who have Limited English Proficiency (LEP) due to their national origin and may be limited in their ability to speak, read, write, or understand the English language.

COF is committed to reducing barriers and ensuring equal opportunity for all persons who apply for any program or activity administered by the section. [Title VI, 42 U.S.C. § 2000d, of the 1964 Civil Rights Act](#) specifies that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Additionally, the City of Flagstaff’s City Code Chapter 14-02 states that it is unlawful for any public accommodation, employer, or labor organization to discriminate against someone “because of race, color, religion, sex, age, disability, veteran’s status, national origin, sexual orientation, or gender identity or expression.”

Executive Order 13166 applies to all COF programs and activities which receive funding through federal grants. This Language Access Plan (LAP) outlines the reasonable steps the COF will take to provide meaningful access to all programs and activities for LEP persons, in accordance with Executive Order 13166.

## Four-Factor Analysis

To identify the extent and adequacy of assistance a LEP person will receive, this plan was developed using the four factors recommended by the Department of Homeland Security in its guidance to assess language needs:

Factor 1: Number of LEP Persons Likely to be Served by the Program

Factor 2: Frequency of Contact with Programs

Factor 3: Importance of the Program

Factor 4: Resources and Cost

The United States Census Bureau indicates 4.0% of Flagstaff residents speak English less than “very well,” with the largest single incidence being 2.2% (1,534 persons) among those who speak Spanish (2020 Selected Social Characteristics, American Community Survey).



# CITY OF FLAGSTAFF

The COF administers a variety of programs through many divisions and sections of its organization. These range from street safety and repair to sustainability initiatives, to parks and recreation programs. The frequency of contact for these programs varies but it can be regularly.

## **Procedures**

Through the administration of some of its programs and services program, COF staff work directly with subrecipients, who are also responsible for complying with Executive Order 13166. Procedures

The following measures will be utilized to identify LEP persons:

- All applications for COF programs and activities include a question to determine if the client is LEP and needs additional interpretive services and Prior to any COF-sponsored public meetings, workshops, or conferences, staff will advertise that LEP accommodations are available given reasonable notice.
- Advertisements, fliers, notices, and announcements will contain a notice stating that persons requiring language, hearing, visual, mobility, or other accommodations may contact the COF and will provide an appropriate contact to make special arrangements for services.
- [Language Identification and I Speak Cards](#) will be utilized as necessary to identify an LEP person's primary language.

COF is committed to providing reasonable interpretation and translation services at no cost to LEP persons.

COF staff will ensure that all subrecipients comply with Executive Order 13166. Specifically, subrecipients must have an LEP language access plan to provide meaningful access to services.

The following services are available to LEP persons through the COF:

- Bilingual staff
  - The City of Flagstaff has multiple employees who are bilingual in English/Spanish, and English/Navajo, who can be utilized based on availability.
- Written language services
  - The City of Flagstaff website, which provides information about the COF programs, is compatible with a universal translator.
  - Vital documents will be translated to Spanish by request. All documents will contain the wording, "This translation is provided as a service required under Executive Order 13166. The English version is the official, legal-binding document. This translated document is not an official document."
- Community volunteers



# CITY OF FLAGSTAFF

- To the extent possible, with consent from the LEP person and as agreed by the COF, friends and family of the LEP person may be utilized to provide interpretation and translation.

## Staff Training

All public-facing COF staff will be trained on Executive Order 13166 and this LEP. The training will consist of:

- An overview of Title VI of the 1964 Civil Rights Act;
- Accessing and utilizing [language identification and I Speak cards](#);
- Language measures provided by the COF;
- How to access a staff interpreter;
- How to access the on-call interpreter service;
- Documentation of language assistance requests

## Providing Notice to LEP Persons

The following measures will be taken to provide notice to LEP persons of the language services available to them:

- This LAP will be posted on the City of Flagstaff [webpage](#) and shall be made available by request to any entity or individual.
- COF will ensure community partners who perform contracted services in the Flagstaff community comply with Executive Order 13166.

Digitally signed by Greg  
Clifton  
Date: 2024.11.19  
10:45:39 -07'00'

Greg Clifton  
City Manager  
City of Flagstaff