



# 2025 Title VI Implementation Plan

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## **I. Policy Statement**

Title VI of the 1964 Civil Rights Act requires that any federally funded Pima Association of Governments' (PAG's) planning or programming activities, such as the long-range transportation plan or the Transportation Improvement Program (TIP), be free of discrimination. Further guidance from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) incorporates the Americans with Disabilities Act (ADA) regulations in addition to Title VI into regional transportation plans. Federal transportation legislation, such as the Infrastructure Investment and Jobs Act (IIJA) ([www.fhwa.dot.gov](http://www.fhwa.dot.gov)), recognizes these non-discrimination requirements as applying to both the planning, as well as to individual project implementation by respective jurisdictions. Additionally, Title VI compliance must include both data collection and analytic methods to assess impacts to protected groups and their level of public involvement.

This plan summarizes Pima Association of Governments' (PAG's) efforts to address Title VI requirements in its planning and programming activities only. The plan highlights recently completed or upcoming activities in PAG's regional transportation planning, air quality and water management planning, and rideshare and travel demand management program areas. As a part of the Title VI Implementation Plan, PAG is required to update the plan each year, analyzing demographic data or protected populations as defined by Executive Order (EO) 12898. For all Title VI analyses, PAG also includes low-income, elderly, individuals with a disability and limited English proficiency (LEP) populations in its analysis. PAG is also required to include Title VI notices on public agendas and other products. Staff are trained in outreach as well as the Title VI complaint procedure. PAG does not discriminate within procurement processes, and staff are trained on disadvantaged business enterprise (DBE) goals. Existing policies and procedures, such as PAG's Title VI assurances and procedures, are also addressed in this plan.

PAG is committed to complying with the requirements of Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all federally funded programs and activities. PAG operates without regard to race, color or national origin, and will make every effort to address and eliminate such discrimination, if found to exist. PAG meetings are held in accessible locations (on site or virtual), and materials are provided in accessible formats or in languages other than English upon request within a reasonable advance notice period.



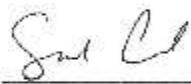
DATE: 1/21/26

(Signature of Authorized Official)  
Pima Association of Governments  
Michael J. Ortega, P.E., Executive Director



DATE: 1/21/2026

(Signature of Authorized Official)  
Tim Thomure, City Manager



DATE: 01-16-2026

(Signature of Authorized Official)  
Samuel Credia, Director of Transportation

## II. MPO Organization and Program Administration

### ***Introduction***

Under the Title VI Civil Rights Act or activities receiving federal financial assistance, PAG may not exclude persons from participating in, deny benefits to or subject anyone to discrimination based on a person's race, color, national origin or income status. This document outlines the roles, method of administration, and analysis that supports Pima Association of Governments' (PAG) regional planning activities. This program document also represents PAG's commitment, obligations and compliance regarding Title VI.

For recipients of federal funds, the External Civil Rights of the Arizona Department of Transportation (ADOT) is responsible for ensuring Title VI compliance for subrecipients, such as local governments, and Metropolitan Planning Organizations (MPOs), such as PAG, in accordance with Title 23 CFR § 200.9 and FTA Circular 4702.1B. As described on ADOT Title VI Nondiscrimination Program [web page](#), ADOT's Title VI enforcement responsibilities include conducting internal and external compliance reviews, providing technical support to subrecipients developing their Title VI Program, approving subrecipients' Title VI Policy, Assurances and Plan, and more. Approval of the Title VI plan rests with the EXTERNAL CIVIL RIGHTS (ECR) as PAG is a subrecipient of ADOT FHWA/FTA funds.

On behalf of the Federal Highway Administration and Federal Transit Administration, the ECR provides a detailed checklist to MPOs to guide the development of Title VI implementation plans. That checklist, entitled "FHWA/FTA Title VI Implementation Plan Checklist," is included in Appendix K.

This plan adheres to all ADOT Title VI requirements.

This Title VI Implementation Plan is the product of a joint effort between PAG and the ECR in fulfilling policies and regulations outlined by both FHWA and FTA. It reflects PAG's commitments to Title VI objectives through specific U.S. Department of Transportation assurances, notices to the public, ongoing collection and presentation of demographic statistics, Title VI organization and staffing, development of a Limited

English Proficiency Plan, up-to-date complaint forms and procedures, annual staff training, and general public participation efforts.

As such, the Title VI Implementation Plan acts as a generalized guide and policy directive for more specific efforts encapsulated within individual plans and programs. For specific strategies and goals on public involvement, please refer to the PAG Public Involvement Plan (PIP). Additionally, outreach efforts and robust Title VI analysis for specific plans and programs are outlined in detail within those documents, such as the TIP and the RMAP. The analysis provided within these documents, as well as the input from the communities of concern, is presented as the planning activity moves through the PAG committee process. PAG makes every effort to be compliant in all matters related to Title VI.

Finally, PAG does not deliver individual projects and does not therefore perform a Title VI analysis on individual construction projects. Each construction project sponsor is responsible for its Title VI compliance processes as part of the planning, design and construction of its individual projects. Please refer to the Title VI Implementation Plan for each project lead agency for more details.

In summary:

- The ADOT External Civil Rights (ECR) is responsible for ensuring that subrecipients of federal funds, such as local governments and MPOs, comply with Title VI, such as through site visits and document review.
- The scope and contents of PAG's Title VI Implementation Plan follows specific requirements set forth by the ECR on behalf of FHWA and FTA.
- The overall scope and contents of PAG's Title VI Implementation Plan is similar to that of other MPOs in Arizona and, based on review of a few other MPOs outside of Arizona, this document similar to those as well.
- The PAG Title VI Implementation Plan acts as a guide and policy directive for more specific efforts encapsulated within individual planning documents and programs, such as the RMAP and TIP.
- The scope of PAG's Title VI Implementation Plan does not cover Title VI compliance for individual construction projects, which are the responsibility of the respective jurisdictions.

## ***General Organization***

Pima Association of Governments (PAG) was established in Pima County in 1972 as a 501(c)4 nonprofit association and became a designated metropolitan planning organization in 1973. The organization embraces a vision which recognizes the independence of each PAG member jurisdiction and celebrates the region's diverse cultural influences. PAG's nine members include the Cities of South Tucson and Tucson, Pima County, the Towns of Marana, Oro Valley and Sahuarita, the Pascua Yaqui Tribe, Tohono O'odham Nation and Arizona Department of Transportation. 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.

Dr. Philana A. Jeremiah, PAG/RTA Transportation Planning Coordinator, has been designated as the PAG Title VI Coordinator. On matters relating to Title VI, the coordinator has direct access to the Executive Director. A PAG organizational chart is included in the Title VI Implementation Plan as Appendix H.

All PAG staff receive annual training at an all-staff meeting. The training focuses on Title VI requirements, how the organization fulfills those requirements, and the responsibilities each individual staff member has in fulfilling those requirements. Title VI training is conducted by the PAG Title VI Coordinator. An attendance log of the training is maintained to ensure that every member of staff receives the annual training. Staff members who were unable to attend the training also receive training in a group or, if necessary, one-on-one training with the Title VI Coordinator.

This annual Title VI training for staff will include the following elements:

1. A review of PAG's Title VI documents, what each one contains, and where they can be accessed and viewed.
2. Staff responsibilities for including Title VI notices on agendas and notifications.
3. Staff responsibilities for preparing for and reacting to potential LEP needs during public meetings and events.

4. Title VI complaint procedures, locations of the complaint form, and how staff are to respond if a member of the public approaches them with a complaint of discrimination.
5. Definitions of a disadvantaged business enterprise (DBE), and how the PAG procurement process responds if the state sets a DBE goal for a particular advertisement.

The PAG Title VI Implementation Plan must be approved each year by the PAG Regional Council. This will be done at the next Regional Council meeting in September 2025. The Legal Action Report for that meeting is included as Appendix J.

### ***Title VI Program Administration***

PAG engages in three broad categories of activities with Title VI implications. These activities are periodically reviewed to ensure that the way they are administered does not have a disparate impact upon minority populations. In addition, PAG has a responsibility to document the process by which these activities are administered, and to follow those processes consistently.

#### Regional Planning

PAG engages in a variety of planning activities that result in several different planning products. These products include both the Regional Mobility and Accessibility Plan (RMAP), and the biennial Transportation Improvement Program (TIP). PAG's regional planning efforts also encompass several mode-specific plans such as the Regional Pedestrian Plan and the Regional Freight Plan. Finally, PAG is the designated planning agency under section 208 of the Clean Water Act and is thus responsible for the Areawide Water Quality Management Plan (208 Plan). PAG also manages the Regional Transportation Authority, a political subdivision of the state, established in Pima County in 2004. The RTA is the fiscal administrator of the 20-year, voter-approved RTA plan and half-cent excise (sales) tax, which funds the plan.

#### Communication and Outreach

The PAG communications department engages in outreach and public involvement activities. These activities include organizing open houses for the public to review

regional plans, promoting PAG-sponsored events and activities through emails, social media and advertisements, and managing the PAG website. In all these activities, PAG staff ensures that minority populations are included in the outreach efforts, including individuals with limited English proficiency.

Since 2012, PAG has included a Title VI section on the PAG website where the public can learn about PAG's Title VI commitments, Non-Discrimination Policy, and Limited English Proficiency Plan, as well as download the Title VI complaint process and complaint form.

The Title VI webpage on the PAG website includes introductory text in both English and Spanish. A "Google Translate" button is also available on the website, including the Title VI webpage, to allow users to translate the entire PAG website into multiple languages. A link to the Title VI information in English and Spanish is available on the PAG homepage. A fillable self-identification pdf and online forms are posted on the Title VI web page and Meetings and Events page.

#### Procurement and Contracts

PAG works closely with the Arizona Department of Transportation (ADOT) to ensure the most up-to-date language and assurances are included in relevant contracts, MOUs and other agreements. Annually, PAG's Contracts Administrator and/or Finance Director review relevant contracts, MOUs and other agreements to ensure they include the most up-to-date language and assurances.

#### Subrecipient Review

PAG has no subrecipients.

In the event that PAG acquires the responsibility to monitor and review subrecipients, PAG will provide annual Title VI training for select personnel among its subrecipient agencies. That training will be identical to the training provided to PAG staff. In addition, PAG will utilize the Title VI Subrecipient Compliance Assessment Tool provided on the ADOT website. PAG will request any subrecipients to complete that questionnaire on an annual basis.

The subrecipient compliance assessment tool can be found on ADOT's website here:

<https://azdot.gov/business/civil-rightsexternal-eeo-contractor-compliance/title-vi-nondiscrimination-program/fhwa>

### III. MPO Membership

#### ***Member Agency Demographics***

Below is a table containing the demographic composition of PAG's planning area population and is taken from 2023 American Community Survey 5-year data estimates. Percentages may total more than 100% due to self-identification in more than one category. Please note that "Hispanic" is an ethnic designation rather than a racial one. Those identifying as Hispanic may also identify as any race, so table totals may sum to more than 100%.

Jurisdiction	Total Population	White Alone	Black or African American	Native American or Alaska Native	Asian	Native Hawaiian and other Pacific Islanders	Some Other Race	Hispanic	Two or More Races
<b>Pima County (PAG Planning Area)</b>	1,049,947	51.2%	3.3%	2.0%	2.9%	0.1%	0.4%	36.1%	2.9%
<b>City of Tucson</b>	543,348	43.7%	4.6%	1.4%	3.0%	0.2%	0.3%	42.7%	3.1%
<b>City of South Tucson</b>	4,601	8.4%	3.1%	12.5%	0.2%	0.0%	0.3%	74.8%	1.7%
<b>Town of Marana</b>	54,487	61.1%	3.0%	1.0%	4.2%	0.0%	0.6%	26.2%	3.2%
<b>Town of Oro Valley</b>	47,595	76.3%	1.4%	0.1%	3.6%	0.1%	0.3%	14.6%	2.5%
<b>Town of Sahuarita</b>	35,012	56.0%	2.8%	0.1%	1.0%	0.1%	0.8%	36.0%	3.4%
<b>Tohono O'odham Nation</b>	9,561	3.5%	0.2%	85.5%	0.0%	0.0%	0.0%	9.3%	1.4%
<b>Pascua Yaqui Tribe</b>	3,466	1.0%	0.2%	72.6%	0.0%	0.1%	0.1%	24.5%	1.5%
<b>Unincorporated Pima County</b>	365,904	57.9%	1.6%	3.5%	2.5%	0.0%	0.4%	30.2%	2.8%

Source: 2023 American Community Survey 5-year Estimates

## **PAG Committees**

A nine-member Regional Council is the governing body of Pima Association of Governments and includes one member from each jurisdiction, plus an Arizona State Transportation Board member for transportation issues only.

The Regional Council acts on policies, plans or reports that pertain to cross-jurisdictional issues on transportation, air quality, water quality, land use or human services. Per PAG's bylaws, the Regional Council is composed of the top elected official in each member jurisdiction, and the Pima County representative on the Arizona State Transportation Board (who is appointed by the governor).

**Regional Council**

	Race/ethnicity				
	Hispanic*	African American	Native American	Asian American	White
Number	2	0	2	0	5
Percent	22%	0%	22%	0%	56%

\* "Hispanic" is an ethnicity and not a racial category; some committee members of Hispanic ethnicity preferred reporting a designation based on race rather than ethnicity.

The RTA Citizens Advisory Committee (CAC) was established in May 2018 and dissolved in December 2023. This committee worked in collaboration with the RTA Technical Management Committee (TMC) to jointly advise on and recommend a new draft RTA plan to the RTA Board for approval and eventual voter consideration.

Applications for CAC membership were sent to PAG's mailing list, which includes organizations and agencies that represent racial and ethnic minorities in the region, such as the Tucson Hispanic Chamber of Commerce.

Membership on the CAC did not revolve or rotate. Members who were selected at the time the committee was established were expected to serve for three years during which time the committee would perform its work. Of the original 35 members, 22 continued

to serve another 3-year term. In January and March 2022, the RTA Board appointed 11 new members to the committee following an application process. PAG sent three emails to its contacts to seek people to apply, posted the application notice on social media three times, and posted the application notice online. PAG also distributed a news release about the application process to local media, including Spanish language media outlets.

Members of the CAC were selected by the RTA Board which sought to achieve diversity in geographic locations and topical expertise. When new members were appointed, CAC members received a voluntary PAG Self-Identification Survey to complete for our records.

Membership on all other public PAG committees is determined solely by the individual jurisdictions. PAG has no ability to direct membership on any committee representing member jurisdictions or agencies.

## **IV. Title VI Program Review**

### ***Planning***

#### Geographic Analysis of Underserved Populations

Staff within each PAG program area periodically perform a basic assessment to identify the location of protected Title VI in relationship to the provision of information and planning products and services. PAG's online regional data provides program staff with maps showing the location of protected Title VI within PAG's urbanized planning area. ZIP Code maps are also used to show locations of people in databases. The maps of protected populations and mailing list ZIP codes are compiled as one way to demonstrate that protected populations are being notified and/or involved. This documentation is important for demonstrating compliance with Title VI.

This assessment guides the Title VI analysis of each planning product. For PAG's long-range transportation plan, the Regional Mobility and Accessibility Plan (RMAP), an overall analysis of the cumulative effect of all the projects in the plan is conducted. The RMAP analysis assesses the impact of all the projects proposed in the region over the next 20 to 30 years.

Other planning products, such as the TIP or PAG's Long-Range Transit Plan, also follow a similar approach. These plans analyze the regional impact of the plan on protected populations.

However, PAG does not deliver individual projects and does not therefore perform a Title VI analysis on individual projects. Each project sponsor is responsible for its own and Title VI compliance processes as part of the planning, design, and construction of its individual projects.

Specific projects are expected to have appropriate public involvement and mitigation techniques applied during their design and development process. For example, a variety of state and federal rules and regulations govern "just" compensation and relocation assistance for properties that qualify due to the impacts of individual projects. These

requirements are administered by the sponsoring agency at an appropriate time during project development and right-of-way acquisition.

### Title VI Modeling in Plans and Programs

All the projects contained in the TIP must be consistent with PAG's long-range transportation plan, the RMAP. The RMAP has been analyzed and developed to provide an appropriately balanced program of transportation improvements with significant investment in transit, bicycle and pedestrian projects that benefit all individuals including those who may not own or operate a motor vehicle. Projects within the roadway component of the RMAP are distributed throughout the region to prevent disproportionate impacts on any one area or population group. This Title VI analysis is applied to the cumulative impact of all the projects in the plan. Because PAG does not deliver individual transportation projects, it does not conduct a project-by-project analysis for each individual project.

PAG has developed maps showing the concentration distribution of "protected" classes (as defined by federal regulation) within the region. These maps, along with official population statistics, current estimates and projections, and other household data in the PAG region, assist in analyzing the potential disparate impacts of the TIP on these groups.

The types of projects that appear in the TIP may include roadway improvements, bridge improvements, transit improvements, transportation enhancements, transportation planning studies, bicycle and pedestrian programs, rideshare, travel reduction, and airport improvements.

PAG has developed maps showing the concentration distribution of "protected" classes (as defined by federal regulation) within the region. These maps, along with official population statistics, current estimates and projections, and other household data in the PAG region, assist in analyzing the potential impacts of the TIP on these groups.

For this analysis, a "concentration" of a protected group has been defined as those geographic areas where the percentage of a protected population within the area exceeds the average percentage of that same population living within the county as a

whole. For example, if the county average for a protected population is 5%, an area with a population greater than 5% would be considered to have a concentration of that protected population. Also, for this analysis, Transportation Analysis Zones (TAZ) within PAG's urbanized planning area were used as the geographic boundary to identify concentrations of the protected groups.

The method used for this analysis was a computer model computation for the average travel time in the region with and without the projects identified for construction in the TIP. Additional computer runs were performed for each protected class by areas of geographic concentration and at the regional level. An analysis of model results then compared average travel times for protected populations.

The maps included in Appendix I are provided as a graphic representation of the location of the projects in comparison to the location of various concentrations of protected populations.

Because the impacts of projects are very subjective, the analysis assumes projects are equal in their benefits and burdens. The goal of this analysis is to attempt to determine if comparable numbers of people are being impacted by the project in the protected population as are being impacted in the general population. The TIP strives to provide a balance so that all groups are affected at approximately the same ratio.

It should be noted that there are several programs in the TIP that do not lend themselves to being mapped such as rideshare, systemwide technology upgrades, purchase of transit vehicles, etc. These, therefore, are not included in this analysis. For the most part, these activities are targeted toward one or more of the protected classes, or they are distributed uniformly throughout the region. It is assumed then that these activities are either neutral or would improve the observed benefits of the program for each of the protected populations.

The following tables (**Figures 1 and 2**) provide the average travel time for the whole region (labeled "all") and each protected population as found in the PAG FY 2025–/FY 2029 Transportation Improvement Program (TIP). The tables also provide the travel times for the protected populations in concentrations (labeled "protected") and for the

region as a whole. This analysis will be updated in the new TIP currently under development.

Please note that some individuals may belong to more than one protected population. For example, someone could belong to a protected ethnic population and be elderly, disabled and/or low income.

The analysis shows that, when compared to a baseline travel time of all residents in the urban portion of the county (labeled as "all"), the protected populations are expected to experience the same travel time benefits. In both analyses, the average travel time improvement with the TIP projects compared to without TIP projects was 0.1 of a minute (6 seconds). This same result was found for all protected populations and classes.

**Figure 1:** Title VI Analysis:

Modeling Results for Concentrations of Protected Populations: 2024 vs. 2029 (with TIP projects built)

Group	Travel Period	Average Travel Time 2024 (Minutes/Vehicle)	Average Travel Time 2029 with projects (Minutes/Vehicle)	Comparison between years (Minutes/Vehicle) Negative numbers indicate travel time savings
All	Peak	15.3	15.4	0.1
	Off-Peak	13.1	13.0	-0.1
African American	Peak	13.5	13.5	0.0
	Off-Peak	11.4	11.4	0.0
Asian	Peak	13.9	13.9	0.0
	Off-Peak	11.7	11.7	0.0
Disabled	Peak	15.0	15.0	0.0
	Off-Peak	12.7	12.7	0.0
Elderly (+65)	Peak	16.9	16.9	0.0
	Off-Peak	14.5	14.4	-0.1
Hispanic	Peak	14.0	14.2	0.2
	Off-Peak	12.0	12.0	0.0
Low Income	Peak	12.1	12.2	0.1
	Off-Peak	10.3	10.3	0.0
Native American	Peak	14.3	14.6	0.3
	Off-Peak	12.3	12.4	0.1
Pacific Islander	Peak	12.7	12.8	0.1
	Off-Peak	11.0	11.0	0.0

**Figure 2:** Title VI Analysis:

Modeling Results for Concentrations of Protected Populations: 2029 with no projects vs. 2029 with TIP projects built

Group	Travel Period	Average Travel Time 2029 No Build (Minutes/ Vehicle)	Average Travel Time 2029 with projects (Minutes/ Vehicle)	Comparison with and without TIP projects (Minutes/Vehicle) Negative numbers indicate travel time savings with projects
All	Peak	15.5	15.4	-0.1
	Off-Peak	13.1	13.0	-0.1
African American	Peak	13.6	13.5	-0.1
	Off-Peak	11.4	11.4	0.0
Asian	Peak	14.1	13.9	-0.2
	Off-Peak	11.7	11.7	0.0
Disabled	Peak	15.1	15.0	-0.1
	Off-Peak	12.8	12.7	-0.1
Elderly (+65)	Peak	17.0	16.9	-0.1
	Off-Peak	14.5	14.4	-0.1
Hispanic	Peak	14.3	14.2	-0.1
	Off-Peak	12.1	12.0	-0.1
Low Income	Peak	12.3	12.2	-0.1
	Off-Peak	10.4	10.3	-0.1
Native American	Peak	14.6	14.6	0.0
	Off-Peak	12.4	12.4	0.0
Pacific Islander	Peak	12.9	12.8	-0.1
	Off-Peak	11.0	11.0	0.0

### ***Communications and Outreach***

PAG's public involvement plans provide full and fair participation for all potentially affected communities and can be found on the PAG website. Identifying these communities requires close coordination between the development and implementation of the public involvement effort and the data collection and analysis phases of the planning process, all of which are subject to Title VI. The data collection phase provides information on the protected populations, which are often synonymous with the underserved/under-represented populations and, therefore, may need particular attention in the public involvement effort. The analysis phase provides information on the potential level of impact to the various populations which will need to be integrated

into those public involvement efforts seeking input on alternative development, alternative preferences, and/or mitigation.

PAG's documents, data, and information, with few exceptions, are a matter of public record. As such, any request from a member of the public for a PAG document is responded to in a timely manner. At a minimum, a written response is provided within one week of receipt of a public information request.

Strategies From the PIP:

- Make communication and information available in forms accessible to people with disabilities. Translate public information documents as needed or upon request.
- Provide bilingual staff at meetings that are intended for gathering input.
- Obtain feedback from stakeholders and the community to evaluate public participation efforts.
- Build relationships and partnerships with our members, and reach out to stakeholders and individuals in our communities to generate direct communication and input that further supports effective regional decision making. Note: all the strategies outline the potential methods, so you could include that whole section but highlight the part above regarding translation. Again, separate public participation plans are developed per plan/project in alignment with PAG's Public Involvement Policy.

Where appropriate, the following outreach and communication efforts and procedures should be followed on each project conducted by PAG. Please see the [PAG Public Involvement Policy \(PIP\)](#) for more information regarding outreach techniques and strategies.

### Exhibit 4: Levels of Public Involvement

INCREASING LEVEL OF PUBLIC IMPACT					
PUBLIC PARTICIPATION GOAL	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PROMISE TO THE PUBLIC	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
EXAMPLE TECHNIQUES	<ul style="list-style-type: none"> <li>Fact sheets</li> <li>Websites</li> <li>Open houses</li> <li>Newsletters</li> <li>Social media</li> <li>Email notices</li> <li>News releases</li> </ul>	<ul style="list-style-type: none"> <li>Public comment</li> <li>Focus groups</li> <li>Surveys</li> <li>Public meetings/hearings</li> </ul>	<ul style="list-style-type: none"> <li>Workshops</li> <li>Deliberative polling</li> </ul>	<ul style="list-style-type: none"> <li>Citizen advisory committees</li> <li>Consensus-building</li> <li>Participatory decision-making</li> </ul>	<ul style="list-style-type: none"> <li>Citizen juries</li> <li>Ballots</li> <li>Delegated decision</li> </ul>
EXAMPLE LEVELS OF PARTICIPATION	Sun Rideshare Program*	Transportation Improvement Program*	Transit Visioning Process*	2045 Regional Mobility and Accessibility Plan* Regional Transportation Authority Plan Development*	Voter-approved Regional Transportation Authority Plan*

Sources: International Association for Public Participation \* Pima Association of Governments

From our PIP page 12:

Levels of Public Involvement The levels of public involvement and methods will vary depending on the scope of a particular planning or program effort. (Exhibit 4 identifies the levels of public involvement for this PIP.)

### Stakeholder Analysis

PAG staff analyze who will be affected and/or interested in the planning issue or policy being developed. This involves identifying both internal and external stakeholders.

Internal stakeholders typically include PAG member jurisdictions and tribal nations, PAG

staff involved in related activities, and other governmental agencies with jurisdiction or interest in the activity. External stakeholders typically include those non-governmental parties who may be affected by the activities and/or have an interest in them.

Many of PAG's program areas have compiled their own lists of external stakeholders. For each new activity, or over the course of longer activities, these lists are reviewed to ensure they are up to date and reflect the broadest range of stakeholders reasonably possible. A common method for identifying additional stakeholders is to interview existing stakeholders to determine who else needs to be involved.

PAG's communications staff maintains a large database of stakeholders and members of the public identified through a variety of public involvement initiatives over the years. This database includes civic and community organizations serving Title VI, neighborhood and homeowner associations, business groups, elected officials, PAG member jurisdiction staff at various levels, and other public groups. Communications staff are available to assist other agency staff in conducting stakeholder analyses and in accessing the public participation database upon request.

PAG program staff make a deliberate effort to identify and reach stakeholders across the region, including minorities, people with disabilities, seniors, low-income earners and people who might not know they can be part of the planning process.

#### Public Notification of PAG Activities and Services

Promotion of inclusive and accessible public involvement includes regular efforts within each PAG program area to notify a wide range of stakeholders and the public regarding the information, data, funding, policy, and planning issues being addressed.

Public information is presented in formats that are accessible to the intended audiences. Communications staff are available for consultation in determining what information is appropriate to publicize and in what form.

For reaching the public, the website and media outreach (e.g., press releases, ads, social media) are encouraged. For reaching stakeholder groups, distribution of public information documents such as reports and newsletters via direct mail, email and social

media also may be an effective communication method. The use of other methods is considered to promote equal access to information for targeted audiences. In particular, efforts are made to overcome barriers to accessing information among underserved populations, youth and other individuals who may not have internet access or read newspapers.

For example, public service radio announcements on Hispanic radio outlets are one method for reaching Hispanic populations, particularly non-English speaking residents. Additionally, underserved populations are no different than other populations in that they are more likely to read information distributed through trusted and familiar communication channels. Email may be used to distribute notices to school and community-based newsletters for publication. Other distribution methods include placement of English-Spanish information in libraries, community centers, other public places, and social media.

Since early 2020, PAG has invited the public to participate in virtual meetings by visiting a YouTube livestream link to watch public meetings online. YouTube livestream links to these meetings are added to the agenda, as well as notices to invite comment submission via email prior to the meeting.

A Title VI Notice is posted on the main online Meetings and Events page, and information regarding Title VI was added to all agendas. A link to a voluntary self-identification survey (English/Spanish) also has been added to the Title VI tagline in agendas.

### Event Scheduling, Location and Access

Public events are scheduled to increase the opportunity for attendance by stakeholders and the public. This may require scheduling events during non-traditional business hours, holding more than one event at different times of the day or on different days, and checking other community activities to avoid conflicts. For example, events in Green Valley have been found to be more effective if held during daytime or business hours, due to the large concentration of retired individuals living in that area.

When hosting events for public meetings regarding regional plans, PAG tries to ensure that the majority of meeting venues are located on public transit routes, and that the host buildings are accessible for individuals with disabilities.

When a public event or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the PAG region, the event or hearing is held within that geographic area or jurisdiction. The appropriate elected officials as identified in the stakeholder analysis are consulted and/or informed of relevant outreach activities within their jurisdictions.

Traditionally, PAG hosted multiple events for public meetings or open houses regarding regional plans. At a minimum, one event was held in the northern part of the region (Marana or Oro Valley), one was held in the urban core (downtown or midtown Tucson), and one was held in the south (Sahuarita or Green Valley). Additional events were hosted in other geographic locations, as appropriate. With the success of virtual open house participation for the FY 2022–FY2026 TIP, PAG may continue to use virtual events to replace or enhance this traditional approach.

Following the arrival of the coronavirus pandemic in early 2020, PAG started conducting virtual meetings. In 2021, PAG conducted two virtual open houses to review the draft FY 2022–FY2026 Transportation Improvement Program with the public. As with an onsite event, the same level of outreach was executed with advertising promotions in English and Spanish media channels, and via news release, email and social media notifications. The Zoom webinar platform was used for early open house registration. During the virtual open house, participants were able to submit written questions through a question-and-answer tool in Zoom. PAG staff read the Title VI notice at the start of the virtual events, followed by a presentation on the TIP, and a question-and-answer session including representation from PAG member jurisdictions to help provide responses. Participants were asked to submit formal comments online through the PAG website. Spanish-speaking staff were available to answer questions.

### LEP Preparations

PAG staff are trained annually in how to prepare for potential LEP needs at outreach events or activities. Members of staff who conduct such meetings follow the established

Four Factor analysis (see below) in preparing for public meetings and will be conducted on a project-by-project basis. The languages that meet the Safe Harbor Threshold requirement in PAG Service Area as a whole are Spanish, Chinese, Vietnamese, Arabic, Russian, Korean and Tagalog. Within the City of Tucson, only Spanish meets the Safe Harbor threshold. In the smaller incorporated jurisdictions of South Tucson, Marana, Oro Valley, and Sahuarita, no single language group reaches the threshold, though Spanish is the most common LEP language. In the unincorporated areas of Pima County, Spanish also meets the Safe Harbor Threshold. This means that for countywide and regional planning , vital materials should be translated into Spanish, Chinese, Vietnamese, Arabic, Russian, Korean and Tagalog, documents while for place-specific efforts, Spanish alone generally satisfies the Safe Harbor requirement.

*Factor 1: The number or proportion of LEP persons served by the PAG service area.*

When preparing for a meeting, PAG staff are instructed to consult the LEP plan and familiarize themselves with the demographic data contained in that plan. In doing so, staff become familiar with the types and numbers of LEP needs in the PAG planning area.

*Factor 2: The frequency with which LEP individuals encounter PAG programs.*

When preparing for an event, PAG staff, in coordination with the Communications Department, consult records of past events with similar topics or conducted in similar venues. This analysis identifies any of these other meetings where LEP individuals or needs were encountered.

*Factor 3: The importance of the service provided by the PAG program*

PAG programs are of great importance to residents of the region. Where possible, PAG makes every effort to communicate information about PAG programs to all members of the region. No single PAG program is considered less important than the others.

*Factor 4: The resources available and the overall cost to PAG*

The PAG Title VI Coordinator maintains a roster of PAG employees who speak languages other than English and the degree of proficiency with which they speak those languages. If LEP needs are anticipated, PAG staff with the appropriate language skills are invited to attend the event or meeting to assist with translation.

For more information on how PAG has conducted a Four Factor analysis for general LEP purposes, or for information about LEP procedures for public outreach, please see the PAG LEP Plan.

#### LEP Translations

As indicated in PAG's Limited English Proficiency (LEP) Plan, Spanish is the predominant language spoken by those in the PAG service area who speak English "less than very well."

Public information documents written in English, including meeting notices and agendas, include a tagline affirming that PAG will make reasonable accommodations to translate any materials in Spanish, or other languages as needed. This information is also available on the public participation web page and on the Title VI web page.

As a rule, Spanish-speaking staff are on hand at public meetings intended for gathering input.

Members of the public who call PAG or its Sun Rideshare alternative transportation program hotline (884-Ride) and require over-the-phone Spanish interpretation can be directed to a Spanish-speaking PAG staff member.

Spanish translations are used for activities specifically targeted to the public even without a request. Examples of materials to be translated include meeting notifications (e.g., flyer or web posting). Additional information that is translated upon request includes any public meeting handouts, such as fact sheets, newsletters, and executive summaries of planning documents under review.

#### Data Collection and Analysis of Outreach Efforts

PAG makes available a voluntary self-identification survey at every in-person public event hosted by PAG. On an annual basis, the surveys that have been returned to PAG staff are analyzed by the Title VI Coordinator. Each survey is labeled with the name of the event to determine which meetings, if any, are lacking in minority participation. PAG maintains an inventory of the self-identification surveys and provides them to Title VI monitoring agencies upon request.

This self-identification survey is also available via an online form. Attendees of virtual meetings also have the option of downloading a fillable pdf, completing the brief questionnaire, and submitting it to PAG.

On an annual basis, the PAG Title VI Coordinator will estimate, for various public meeting sizes, the number of expected attendees from protected demographics using the ACS 5-year Estimates Data Profiles as shown in the table below for a variety of meeting sizes. Each row shows the measured ACS demographic proportion multiplied by the meeting size.

The Title VI Coordinator will conduct a visual survey of any meeting of the Regional Council, Management Committee, or other policymaking body if the number of public participants is large enough that one or more attendees of a given demographic are expected.

A visual survey is not suited for estimating members of the public who identify as "other" or as "two or more races." Therefore, any analysis of meeting participation by these populations will be based solely on submitted self ID forms, if any.

#### Expected Number of Hispanic Participants at PAG Public Meetings

Meeting Size	Expected Hispanic	Expected Hispanic (Rounded)
5	1.8	2
10	3.6	4
25	8.9	9
50	17.9	18
75	26.8	27
100	35.7	36

*Based on the regional Hispanic population of 35.7% (See table on page 13)*

Expected Number of Black, American Indian, Asian, Pacific Islander, and multiple or some other race Participants at PAG Public Meetings

Meeting Size	Expected Demographic	Expected Demographic (Rounded)
5	0.7	1
10	1.3	1
25	3.2	3
50	6.5	7
75	9.7	10
100	12.9	13

*Based on the average regional population of Black, American Indian, Asian, Pacific Islander, and multiple or some other race populations at a total of 12.9% (See table on page 13).*

At the conclusion of a meeting in which a visual survey is taken, the PAG Title VI Coordinator will analyze the demographic profile of the meeting to confirm that the participants in the meeting fall approximately close to the expected proportions in the tables above. If fewer members of the analyzed demographic were present than expected, the Title VI Coordinator will work with the PAG Director of Communications to develop a plan for increasing outreach to the demographic in question.

### ***Procurement and Contracts***

The PAG Contracts Administrator and/or Finance Director will maintain any submitted demographic data on bidders and awardees. Once a year, the Contracts Administrator and/or Finance Director will review any submitted data with the PAG Title VI Coordinator. Pursuant to state procurement laws, data will not be requested of consultants or contractors prior to the award, and post-award submittal will be voluntary.

If the number of RFPs, RFQs, or contracts issued in a fiscal year is greater than 10, the PAG Title VI Coordinator will analyze the demographic profile of the awardees and compare it to the demographic profile of ADOT's on-call list. The ADOT on-call list will

be used in this analysis to approximate the demographic profile of the universe of potential contractors and consultants.

At the end of each fiscal year, the PAG Title VI Coordinator will review PAG templates for contracts, RFPs and RFQs to ensure that they include the required assurances and appendices.

### ***Data Collection and Analysis***

The data collected from the self-ID surveys or from the visual estimate will only be used internally. At the end of every fiscal year, the Title VI Coordinator will review the data on committee attendance that has been collected over the past year and gauge the effectiveness of outreach efforts to minority communities. These numbers will provide a baseline for the setting of goals for additional outreach efforts in the coming year.

At the end of every fiscal year, the PAG Title VI Coordinator will consult with the PAG Contracts Administrator and/or Finance Director to ensure that all contracts have included the necessary assurances and other clauses. This consultation will also include a review of any demographic data relating to contract bidders and awardees that have been collected during the previous year. This review will help PAG identify if additional outreach efforts need to be made to minority-owned businesses when issuing RFPs and RFQs.

PAG will rely upon data from the American Community Survey (ACS) to create and maintain a demographic profile of the region for use in the Title VI Plan and the Limited English Proficiency Plan. The most recent dataset will be preferred, and 5-year estimates will be preferred over 1-year estimates.

### ***Compliance and Enforcement Procedures***

Each program area approaches its Title VI responsibilities in different ways, as described above. However, in general, the PAG Title VI Coordinator provides annual training to staff, so each PAG staff member understands his or her responsibilities under Title VI. Specialized training also will be provided to certain staff members, including those who prepare and set up public meetings or those who review and manage contracts.

If a PAG staff member fails to comply with Title VI responsibilities, retraining will be provided with additional spot checking of program activities in the ensuing months.

### ***Changes to the Title VI Implementation Plan***

Changes were made to the demographic data included in this year's Title VI Implementation Plan. Additional information was added to the Planning subsection of Section IV that describes the geographic boundary used for mapping Title VI. Lastly, the Notice to the Public was updated to include a URL link to PAG's Title VI webpage as a reference. Aside from minor grammatical edits, all other information in this plan has remained largely unchanged from the previous year.

## **V. Title VI Complaint Process**

Any person who believes that he or she has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 or the Rehabilitation Act of 1973 may file a Title VI discrimination complaint.

PAG maintains a Title VI complaint log and provides a Title VI complaint form on PAG's website as well as at the office front desk. PAG staff have been trained on the federal Title VI requirements and how to assist any member of the public who would like to file a Title VI complaint.

The Title VI complaint procedures described below apply to PAG and its programs, as well as to consultants and contractors funded through PAG.

Title VI complaints may be submitted to any of the contacts below.

Dr. Philana A. Jeremiah  
Title VI Coordinator  
Pima Association of Governments  
1 E. Broadway Blvd, Suite 401  
Tucson, AZ 85701  
Telephone (520) 792-1093, Fax (520) 620-6981  
[pjeremiah@pagregion.com](mailto:pjeremiah@pagregion.com)

ADOT External Civil Rights.  
1801 W Jefferson Street, Suite 101.  
Mail Drop 154A  
Phoenix, AZ 85007  
(602) 712-8946  
[titlevi@azdot.gov](mailto:titlevi@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  
(202) 366-0693  
[Civilrights.fhwa@dot.gov](mailto:Civilrights.fhwa@dot.gov)

**Required procedures for FHWA Title VI Complaints filed against PAG, PAG'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, or national origin, can file a formal complaint with PAG. A copy of the Complaint Form may be accessed electronically at:  
<https://pagregion.com/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, email or in person. However, the complainant may call PAG and provide the allegations by telephone for transcription. Once transcribed, PAG 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, or 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 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 PAG

- f) The date(s) of the alleged discriminatory act(s)
- 5. Upon receipt of a completed complaint, PAG will forward all FHWA Title VI complaints to the Arizona Department of Transportation (ADOT) External Civil Rights (ECR) within 72 hours.
- 6. The EXTERNAL CIVIL RIGHTS (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 the EXTERNAL CIVIL RIGHTS (ECR), the FHWA Office of Civil Rights may delegate the task of investigating the complaint to the EXTERNAL CIVIL RIGHTS (ECR). The EXTERNAL CIVIL RIGHTS (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 using the contact info above.

All FHWA Title VI complaints will be forwarded to ADOT within 72 hours for processing.

**Complaints regarding FTA funding and programs may be investigated by PAG, according to the following procedures:**

1. Any person who believes he and/or she has been discriminated against on the basis of race, color, or national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
2. Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
3. Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
4. Allegations received by fax or email will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
5. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
6. Once submitted, PAG will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by PAG or submitted to the state or federal authority (hereinafter "the Authority") for guidance.
7. PAG will notify the ADOT External Civil Rights of ALL Discrimination complaints within 72 hours via telephone at (602) 712-8946; or email at [titlevi@azdot.gov](mailto:titlevi@azdot.gov).
8. PAG has 60 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The

complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 60 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

9. After the investigator reviews the complaint, she/he will 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 not a Discrimination violation 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. A copy of either the closure letter or LOF also must be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hard copy or email.
11. A complainant dissatisfied with PAG's decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights:

ADOT: ATTN ADA/Title VI Program Coordinator  
1801 W. Jefferson Street, Suite 101  
Mail Drop #154,  
Phoenix, AZ 85007

FTA: Attention Title VI Program Coordinator,  
East Building, 5th Floor-TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

A copy of these procedures can be found online at: <https://pagregion.com/title-vi/>

## **VI. Title VI Complaints, Investigations or Lawsuits Filed**

No Title VI lawsuits or complaints have been filed against PAG within the last three calendar years. A copy of the complaint log is included below.

No complaints	7/31/2021 through 7/31/2024
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## **VII. Notice to the Public**

Pima Association of Governments (PAG) complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. PAG operates without regard to race, color, or national origin. PAG meetings are held in accessible locations, and materials are provided at the front desk in the lobby of our building and online on the PAG/RTA website in accessible formats or in languages other than English upon request within a reasonable advance notice period.

Any person who believes they have been discriminated against by PAG, or any of its sub-recipients or contractors, may file a written complaint with PAG and/or the ADOT External Civil Rights within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For additional information about PAG's procedure and how to file a complaint, contact PAG offices at the address listed below or visit <https://pagregion.com/title-vi>.

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La Asociación de Gobiernos de Pima (PAG) cumple con el título VI de la ley de derechos civiles de 1964 y estatutos y reglamentos relacionados en todos los programas y actividades. PAG funciona independientemente de raza, color, origen nacional, o incapacidad. Las reuniones de PAG se ocurren en lugares de acceso y materiales se proporcionan en formatos accesibles o en idiomas distintos del inglés, si se reciben una petición antes de la reunión.

Cualquier persona que crea que ha sido discriminada por PAG, o cualquiera de sus subreceptores o contratistas, puede presentar una queja por escrito ante PAG y / o a la Oficina de Derechos Civiles de ADOT dentro de los ciento ochenta (180) días siguientes a la fecha del presunto hecho discriminatorio. Para obtener información adicional sobre el procedimiento de PAG y cómo presentar una queja, comuníquese con las oficinas de PAG en la dirección que se indica a continuación, o visite <https://pagregion.com/title-vi>.

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Dr. Philana A. Jeremiah, Title VI Coordinator  
1 E. Broadway Blvd, Suite 401  
Tucson, AZ 85701  
Telephone (520) 792-1093  
Fax (520) 620-6981

## **VIII. Assurances**

Pima Association of Governments (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition of receiving any federal financial assistance from the U.S. Department of Transportation (DOT), through the 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, or 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 citations hereinafter are referred to as the "Acts" and "Regulations," respectively.

### ***General Assurance***

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 Programs* and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*"Pima Association of Governments, 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, for 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 transferee for the longer of the following periods:
  - a. the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subrecipients, subgrantees, 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, ***Pima Association of Governments*** also agrees to comply (and require any subrecipients, subgrantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing ***Federal Highway Administration*** or ***Arizona Department of Transportation*** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the ***Federal Highway Administration*** or ***Arizona Department of Transportation***. You must keep records, reports, and submit the material for review upon request to the ***Federal Highway Administration, Arizona Department of Transportation***, or its designee in a 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.

**Pima Association of Governments** 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 PAG, other recipients, subrecipients, subgrantees, 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.

Pima Association of Governments  
by 

(Signature of Authorized Official)  
Executive Director

DATED: 1/21/26

## Appendices

### Title VI Contract Language

The wording of PAG contracts will reflect the language required by ADOT and the federal government. Appendix A, B, C, D and E include the Title VI language that will be included in: A) contracts, B) deeds effecting or recording transfer of real property, structures and their improvements, and C) deeds, licenses, leases, permits or similar instruments entered into by PAG.

### Other Appendices

Appendix F contains copies of the PAG Title VI complaint procedures and complaint form.

Appendix G contains the Complaint, Lawsuits and Investigations Log.

Appendix H contains the PAG Organization Chart.

Appendix I contains the Title VI maps for the most recent Transportation Improvement Program.

Appendix J contains the Legal Action Report for the Regional Council meeting in which the PAG Title VI implementation plan was approved.

## APPENDIX A

### CLAUSES FOR PAG EXECUTED CONTRACTS

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

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

- 1. Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to non-discrimination in federally assisted programs of the U.S. Department of Transportation, *Federal Highway Administration or the Arizona Department of Transportation*, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
- 2. Non-discrimination:** The contractor, with regard to the work performance by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
- 3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and Regulations relative to non-discrimination on the grounds of race, color, or national origin.
- 4. Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient, the *Federal Highway Administration or Arizona Department of Transportation* to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient, the *Federal Highway Administration, or Arizona Department of Transportation*, as appropriate, and will set forth what efforts it has made to obtain the information.
- 5. Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the *Federal Highway Administration or Arizona Department of Transportation*, may determine to be appropriate, including, but not limited to:
  - a. withholding payments to the contractor under the contract until the contractor complies; and/or
  - b. canceling, 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, the *Federal Highway Administration, or Arizona Department of Transportation* may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

## **APPENDIX B**

### **CLAUSES FOR DEEDS TRANSFERRING U.S. PROPERTY**

The following clauses will be included in deeds affecting 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 **Pima Association of Governments** will accept title to the lands and maintain the project constructed thereon in accordance with *Title 23*, United States Code the Regulations for the Administration of *Federal Aid for Highways*, and the policies and procedures prescribed by the *Arizona Department of Transportation, Federal Highway Administration* and the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by *Title 49*, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in federally assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of *Title VI* of the Civil Rights Act of 1964 (78 Stat. 252;42 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto **Pima Association of Governments** 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 **Pima Association of Governments** 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 **Pima Association of Governments**, its successors and assigns.

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

## **APPENDIX F**

# **PIMA ASSOCIATION OF GOVERNMENTS**

*Asociación de Gobiernos de Pima*

## **COMPLAINT OF TITLE VI DISCRIMINATION**

*Formulario de Queja de Discriminación por el Título VI*

Pima Association of Governments (PAG), as a recipient of federal financial assistance, is required to ensure that its services and related benefits are distributed in a manner consistent with Title VI of the Civil Rights Acts of 1964, as amended.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination under Title VI, on the basis of race, color, or national origin, may file a written complaint with PAG.

We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know.

---

*Asociación de Gobiernos de Pima (PAG), como recipiente de ayuda financiera federal, es requerida a asegurar que sus servicios y servicios relacionados son distribuidos de una manera consistente con el título VI de los Actos de los Derechos Civiles de 1964, con sus enmendadas.*

*Si usted cree que, individualmente o como parte de una clase específica de personas, ha sido discriminado bajo el Título VI, basado en su raza, color, o nacionalidad, puede presentar una queja escrita con PAG.*

*Le pedimos la siguiente información para poder procesar su queja. Si necesita ayuda para llenar este formulario, por favor, pónganse en contacto con PAG.*

---

Submit your signed complaint and any attachments to:

*Entregue el formulario con su firma y páginas adicionales a:*

*Dr. Philana A. Jeremiah*  
PAG's Title VI Coordinator  
1 E. Broadway Blvd., Suite 401  
Tucson, AZ 85701

(520) 792-1093  
(520) 620-6981 *fax*  
[pjeremiah@pagregion.com](mailto:pjeremiah@pagregion.com)

*Para ayuda adicional en español:*

Zonia Kelley  
(520) 792-1093

**1. Complainant**

*Reclamante*

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

*Nombre:*

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

*Domicilio:*

City, State, ZIP Code: \_\_\_\_\_

*Ciudad, Estado, Código Postal:*

Telephone: \_\_\_\_\_

*Número de Teléfono:*

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

*Dirección de Correo Electrónico*

**2. Person Discriminated Against** (if someone other than the complainant)

*Persona que fue discriminada, si no es la misma que el reclamante*

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

*Nombre:*

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

*Domicilio:*

City, State, ZIP Code: \_\_\_\_\_

*Ciudad, Estado, Código Postal:*

Telephone: \_\_\_\_\_

*Número de Teléfono:*

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

*Dirección de Correo Electrónico*

3. Which of the following best describes the reason you believe the discrimination took place:

*En su opinión, ¿en qué se basaron esas acciones discriminatorias?*

		Specify / Especifique
	Race <i>Raza</i>	
	Color <i>Color</i>	
	National Origin <i>Nacionalidad</i>	

Note: The listed categories above are those that are specifically protected by federal law. PAG will consider complaints of discrimination based on other categories on a case-by-case basis.

*Nota: La categorías arriba son solo ellos que son protegidos por la ley federal. PAG considerará quejas de discriminación basadas in otras categorías caso por caso.*

4. Date of the alleged discrimination: \_\_\_\_\_

*Fecha de la supuesta discriminación:*

5. In the space below, please describe the alleged discrimination. Explain what happened and who you believe was responsible. Include names and contact information of persons who may have knowledge of the alleged discrimination.

*En el espacio abajo, describa el supuesto acto de discriminación. Explique lo más claro posible lo que pasó y quien usted piensa es el responsable por el supuesto acto. Incluye los nombres de las personas que puedan tener conocimiento del supuesto acto y cómo contactarlas.*

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6. Have you filed a complaint of the alleged discrimination with a federal, state or local agency, or with a state or federal court?  
*¿Ha presentado usted (o la persona que fue discriminada) la queja ante una agencia del gobierno federal, estatal o local? ¿O ante la corte estatal o federal?*

Yes \_\_\_\_\_ No \_\_\_\_\_  
Sí                    No

If yes, check all that apply:

		Specify / Especifique
	Federal <i>Federal</i>	
	State <i>Estatal</i>	
	Local <i>Local</i>	
	Federal Court <i>La Corte Federal</i>	
	State Court <i>La Corte Estatal</i>	

Please provide the name of the agency where you filed your complaint.  
*¿Ante qué agencia usted presentó la queja?*

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

Contact Person at the Agency: \_\_\_\_\_  
*Nombre del investigador o representante*

7. Please sign below. You may attach any additional information you think is relevant.  
*Por favor, firme el formulario. Adjunte cualquier información adicional que usted cree es pertinente con su queja.*

---

Signature of Complainant

*Firma del reclamante*

---

Date

*Fecha*

## **APPENDIX G**

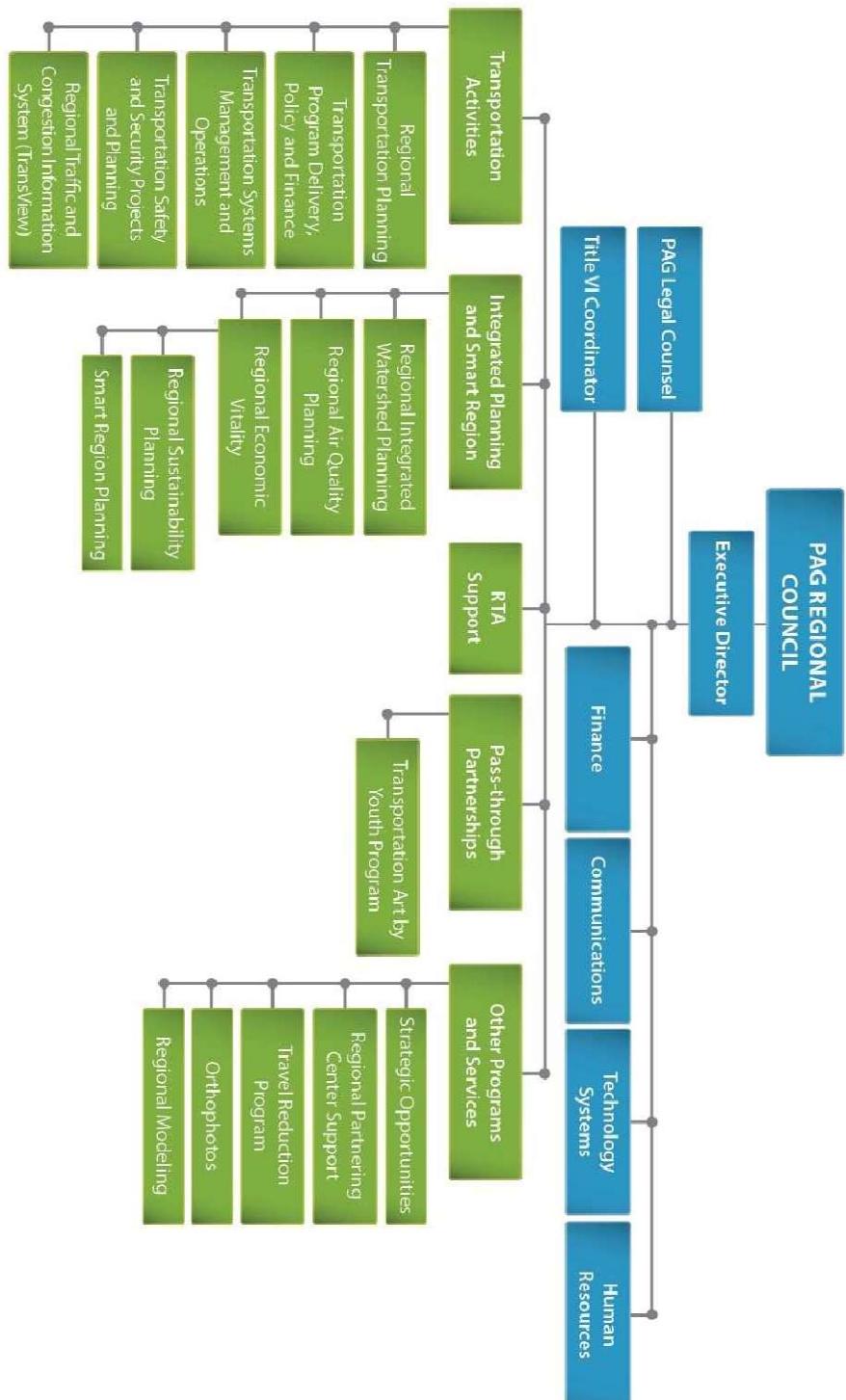
## Title VI Complaint Log

# Pima Association of Governments

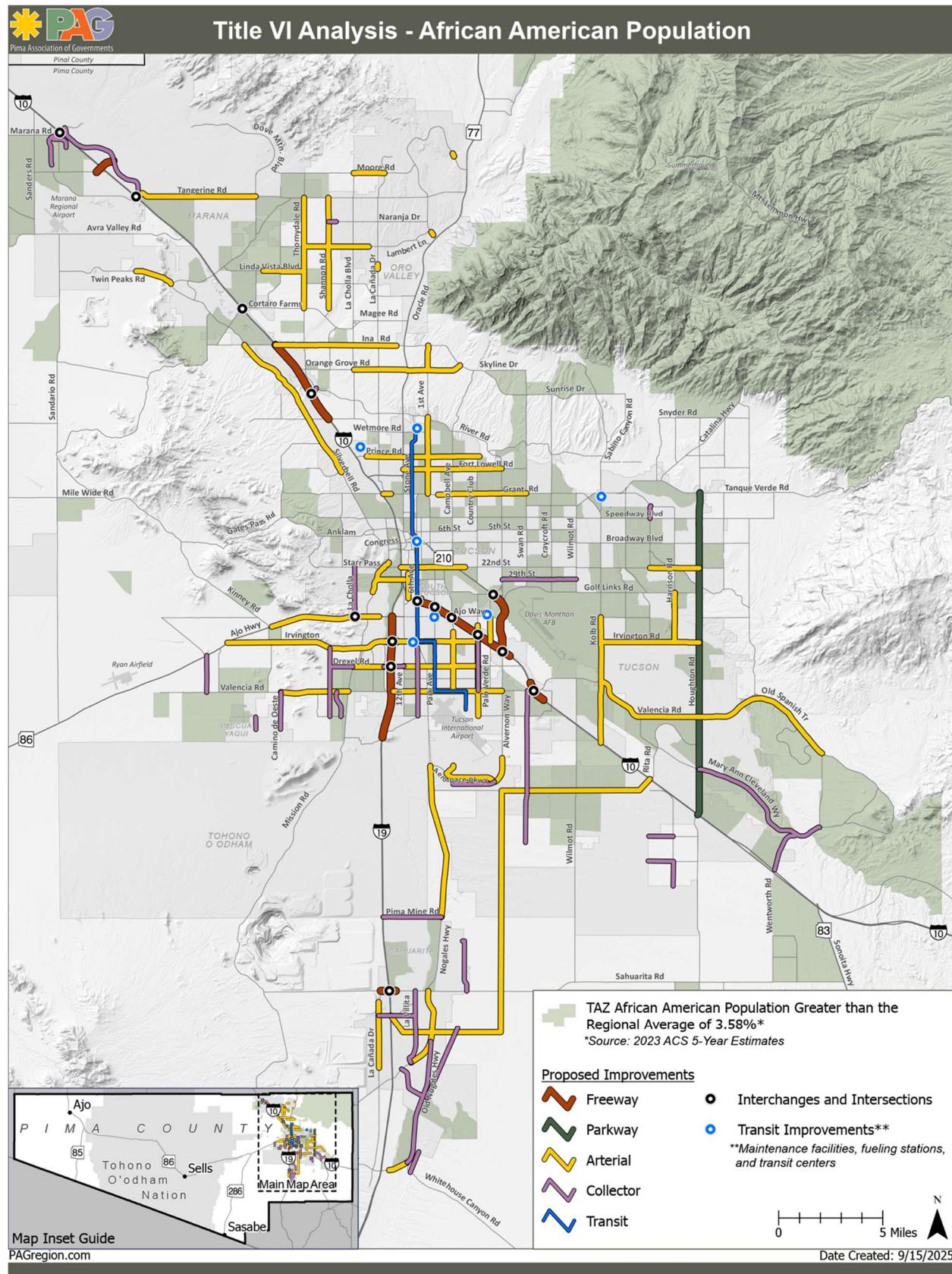
**No Title VI complaints were received between the following dates:**

- **August 1, 2022 – July 31, 2025**

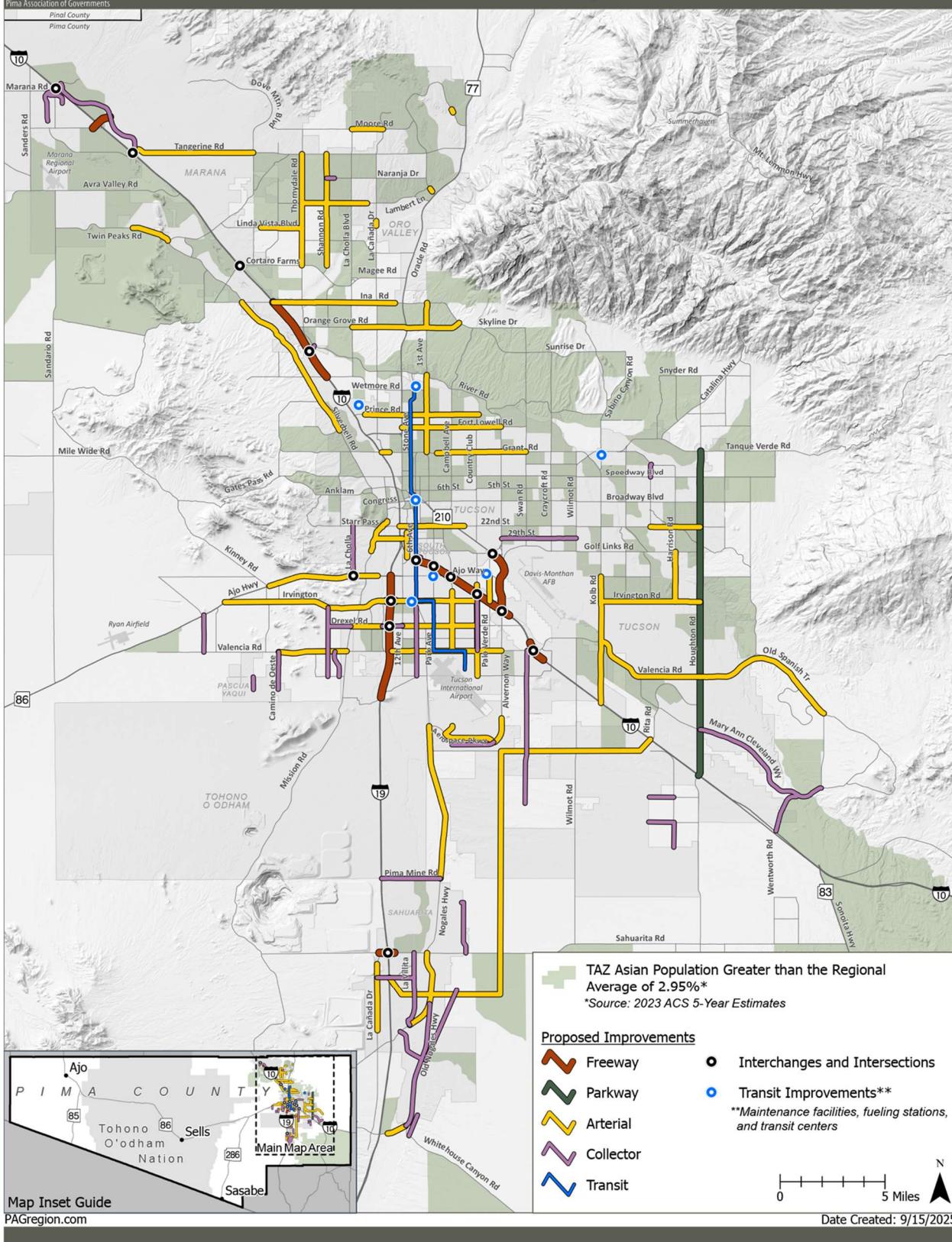
## **APPENDIX H**



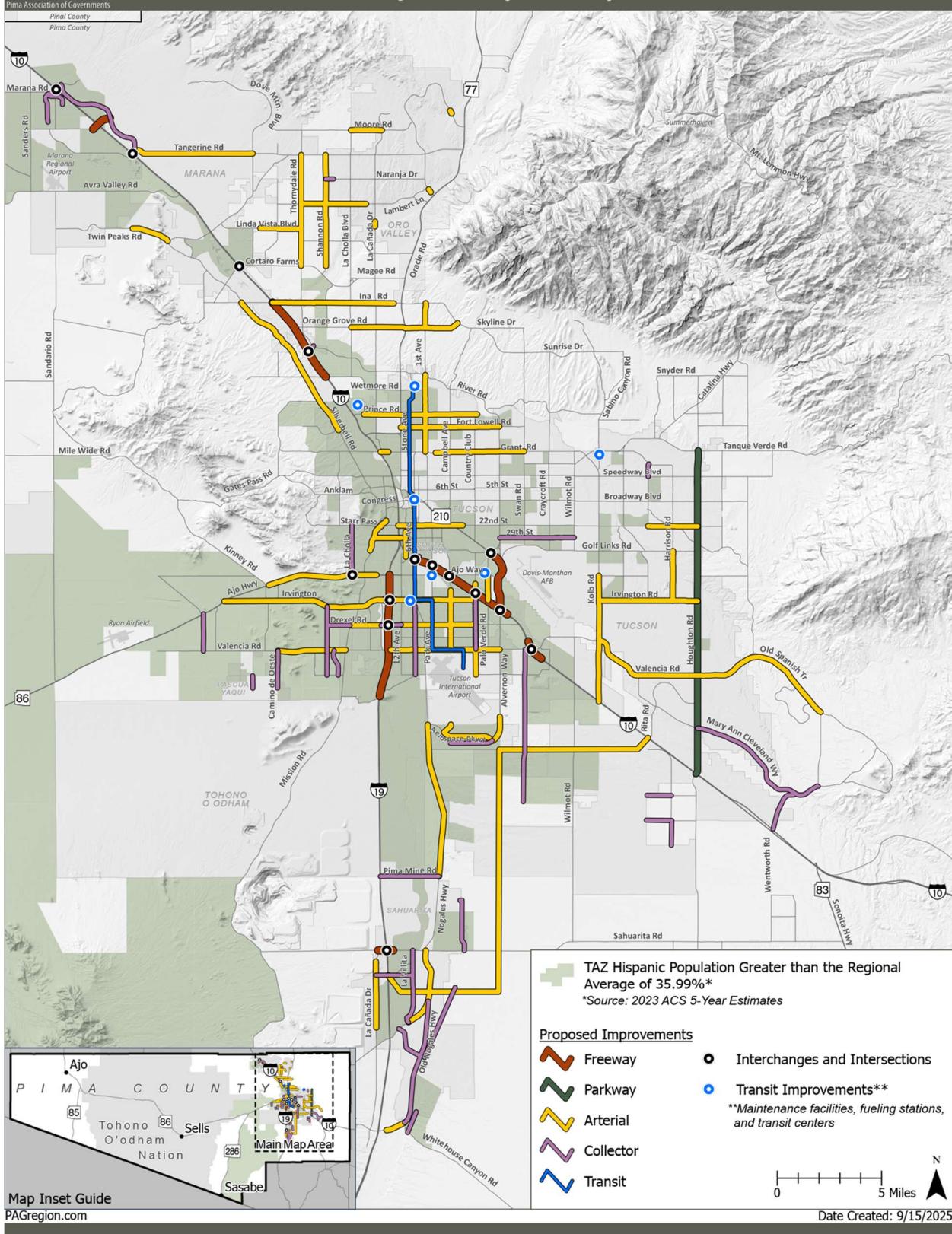
## APPENDIX I



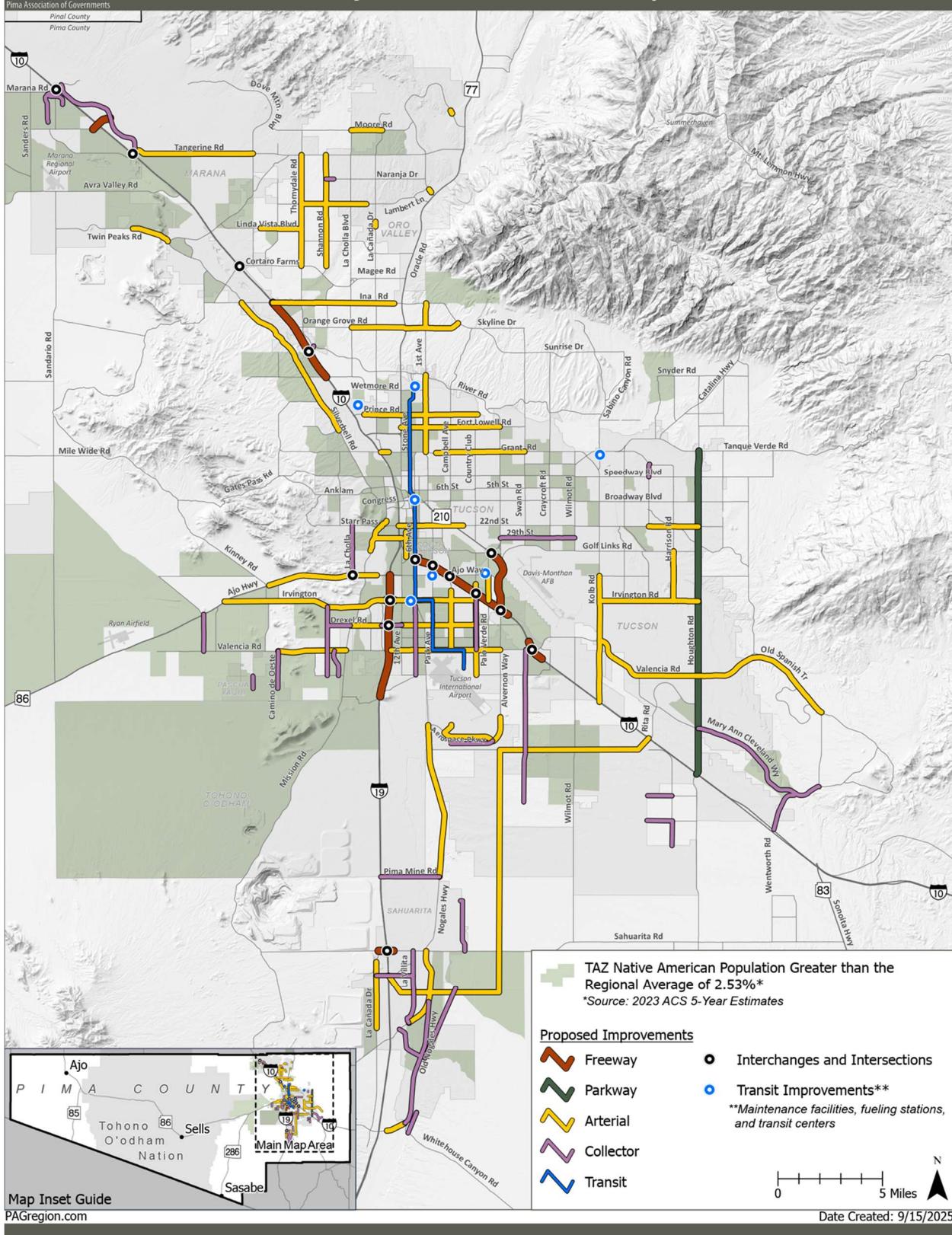
## Title VI Analysis - Asian Population

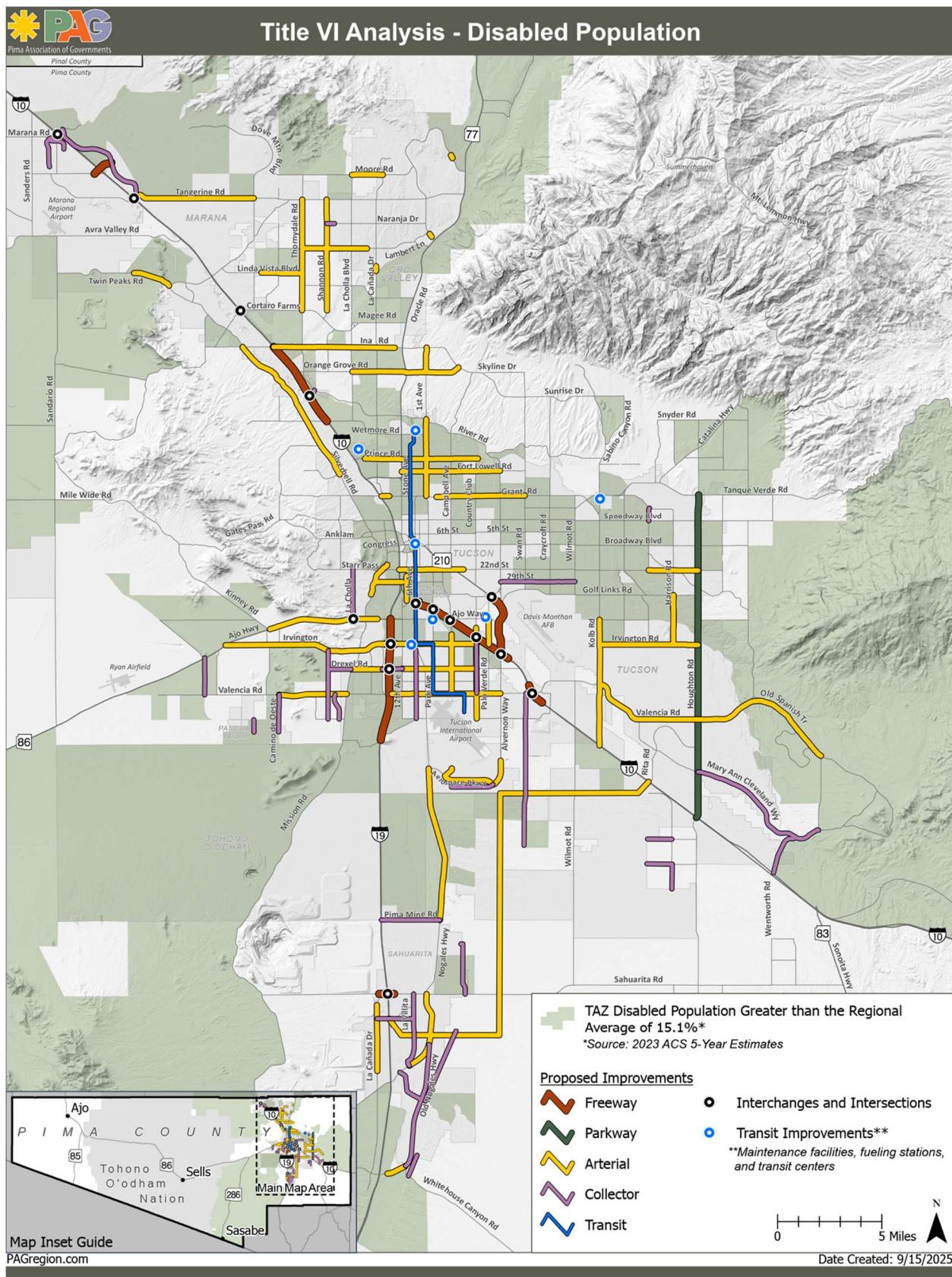


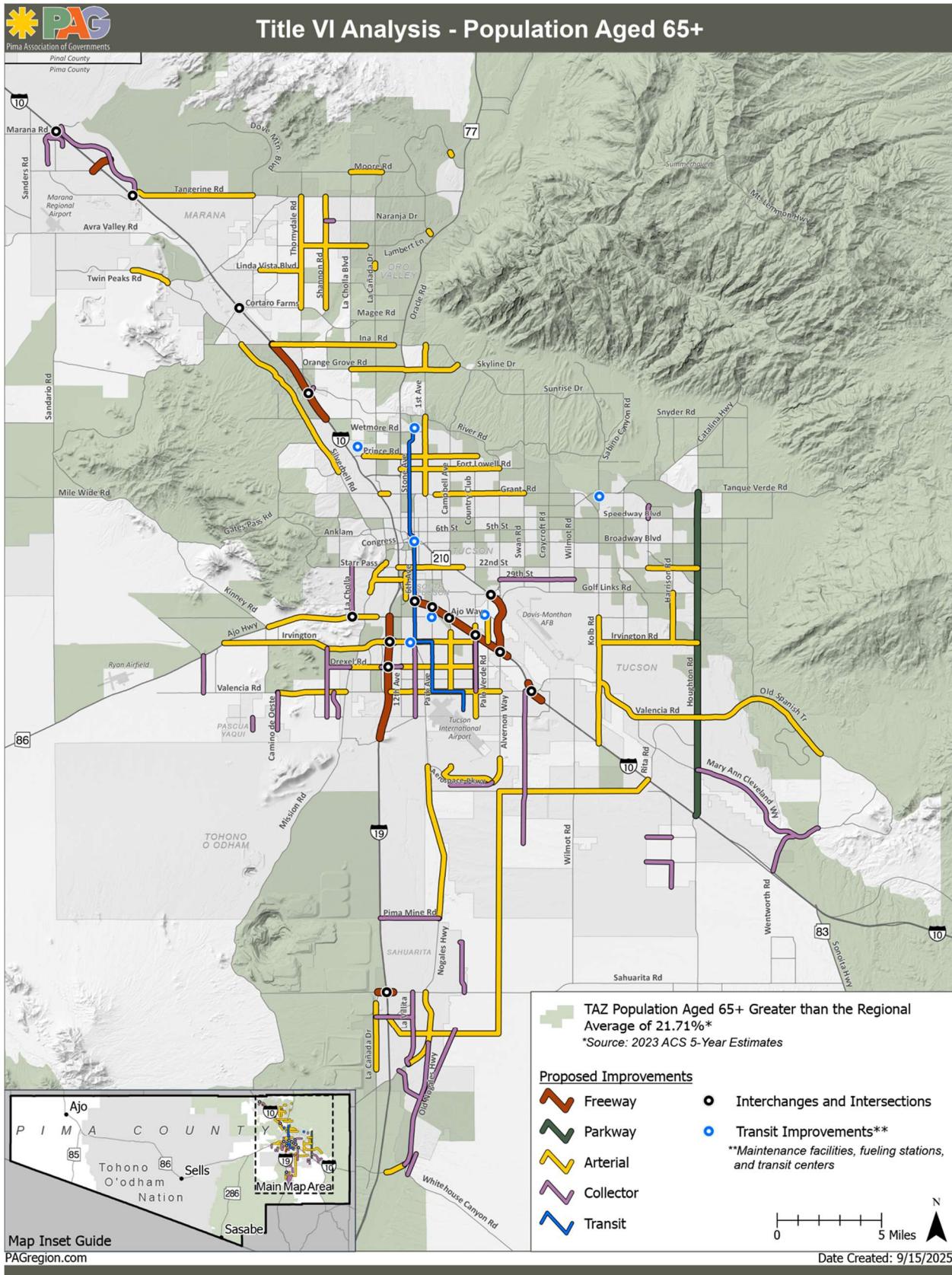
## Title VI Analysis - Hispanic Population



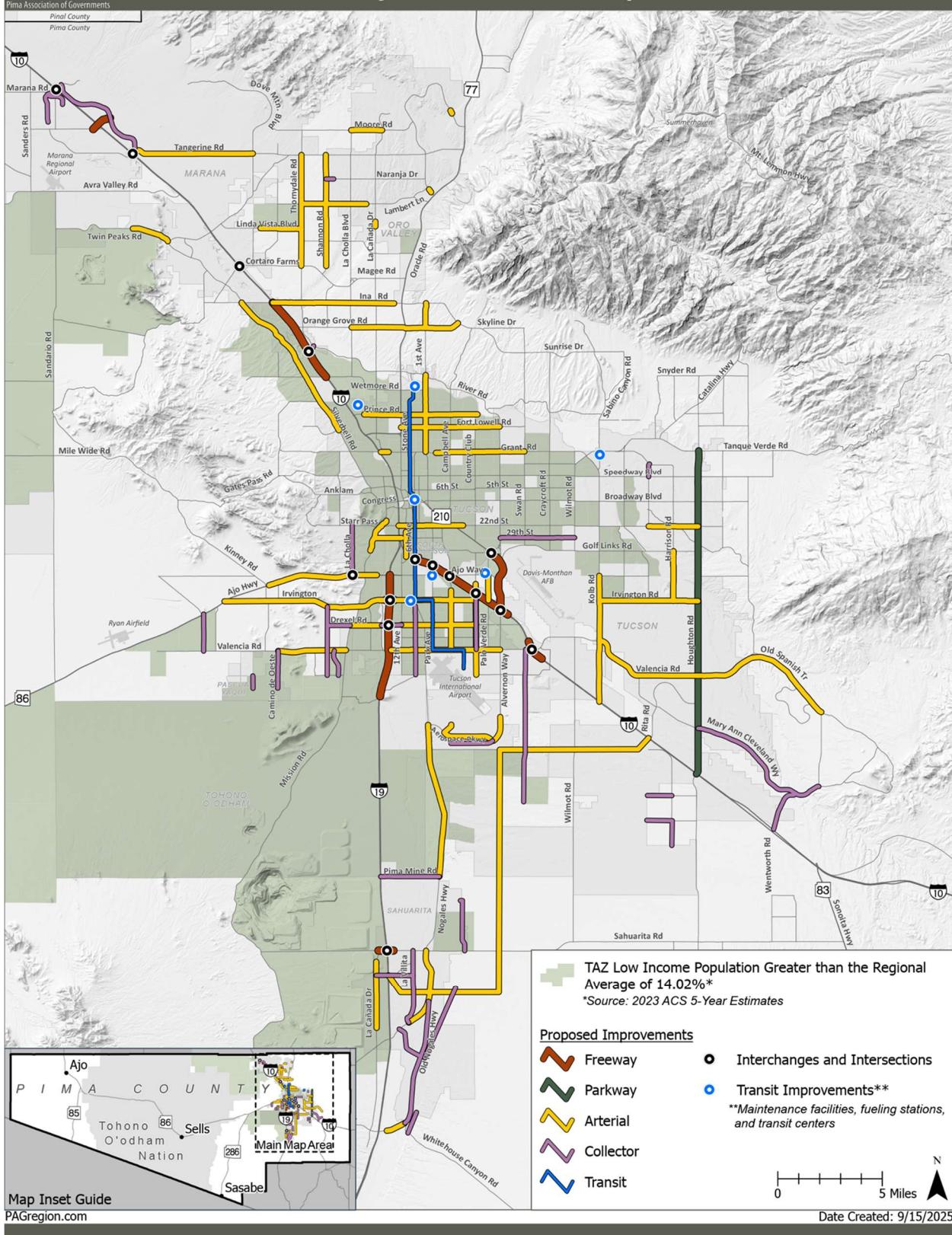
## Title VI Analysis - Native American Population







## Title VI Analysis - Low Income Population



## APPENDIX J



### Regional Council Meeting Legal Action Items

Legal Actions of Thursday, Dec. 4, 2025, meeting

Pima Association of Governments  
1 E. Broadway Blvd., Suite 401, Tucson

Meeting Audio/Presentations (if technologically available): [Recorded Meeting](#)

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*"We encourage and uphold the importance of regional collaboration as the RTA Board addresses regional priorities and pursues regional solutions."*

To view the full Regional Collaboration and Unity Pledge, visit [PAGregion.com/pledge](#)

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### AGENDA

#### 1. Call to Order

The meeting was called to order at 12:09 p.m.

#### 2. Call to the Audience (Remote Access Option)

**Speakers:**

- J.P. Salvatierra

#### 3. Meeting Summary Approvals

Motion was made by Mayor Tom Murphy, Town of Sahuarita, seconded by Mayor Joe Winfield, Town of Oro Valley, and unanimously carried that the Regional Council of Pima Association of Governments approve the Meeting Summary of Sept. 25, 2025.

#### 4. Consent Agenda Items

All items listed under the Consent Agenda are for information purposes only.

##### a. Program Highlights Report

There was no discussion on this item.

**b. Contracts and Agreements Report**

Mayor Winfield, Town of Oro Valley, asked for this item to include a brief description of each contract along with financial details.

Motion was made by Mayor Jon Post, Town of Marana, seconded by Mayor Tom Murphy, Town of Sahuarita and unanimously carried that the Regional Council of Pima Association of Governments approve the consent agenda as noted.

**5. PAG Regional Active Transportation Plan (RATP)**

PAG Planning Manager Hannah Oden provided the Regional Council with a presentation regarding the RATP which included the key elements of the plan.

PAG Executive Director Michael J. Ortega and Ms. Oden fielded questions from the Regional Council regarding plan specifics.

Motion was made by Mayor Tom Murphy, Town of Sahuarita, seconded by Mayor Jon Post, Town of Marana, and unanimously carried that the Regional Council of Pima Association of Governments approve the Regional Active Transportation Plan (RATP).

**6. Dial-a-Ride and Microtransit Service Area Analysis**

PAG Planning Manager Hannah Oden and Mobility Manager Preston McLaughlin provided the Regional Council with the findings and results of the Dial-a-Ride and Microtransit Service Area Analysis and related key elements.

Ms. Oden, Mr. McLaughlin and Maribeth Echewerry (Kimley-Horn) fielded questions from the Regional Council regarding plan specifics.

This is an information item; no action taken.

**7. PAG Social Services Planning Subcommittee – Social Services Block Grant**

PAG Transportation Mobility and Accessibility Program Manager Genine Sullivan reported on this item including SFY27 Federal Social Services Block Grant allocations for the PAG region.

Motion was made by Mayor Joe Winfield, Town of Oro Valley, seconded by Mayor Tom Murphy, Town of Sahuarita, and unanimously carried that the Regional Council of Pima Association of Governments approve the recommended funding allocations for the Federal Social Services Block Grant.

(SSBG) SFY27 to the Arizona Department of Economic Security (DES) as presented. Staff will also request additional funding for additional services and categories.

**8. 2025 PAG Title VI Implementation Plan**

Mobility Manager Preston McLaughlin provided the Regional Council with a report on PAG's Title VI Implementation Plan which is updated annually to meet requirements established by the Arizona Department of Transportation, which oversees PAG's designation as a metropolitan planning organization.

The Regional Council provided comments regarding the 2025 plan and future plans.

Motion was made by Mayor Joe Winfield, Town of Oro Valley, seconded by Mayor Tom Murphy, Town of Sahuarita, and unanimously carried that the Regional Council of Pima Association of Governments adopt the 2025 PAG Title VI Implementation Plan as presented.

**9. Executive Director's Employment Agreement**

Lisa Anne Smith, Legal Counsel, noted that based on the input from the Board at the last meeting, a new form of contract was prepared for the Executive Director. The primary change is that it's a term contract through the end of December 2026 subject to annual renewal thereafter.

Motion was made by Mayor Joe Winfield, Town of Oro Valley, seconded by Mayor Jon Post, Town of Marana, and unanimously carried that the Regional Council of Pima Association of Governments approve the contract for the Executive Director of Pima Association of Governments (PAG) and the Regional Transportation Authority (RTA) of Pima County.

**10. Request Future Agenda Items**

- Request to discuss the role PAG serves in providing planning support for traffic safety regionwide. Including improving safety for our most vulnerable users of the transportation system, people walking and biking.
- Request to discuss the possibility of expanding membership to include transit dedicated individuals.

**11. Executive Session**

Pursuant to A.R.S. § 38-491.03 (A)(3) (discussion or consultation for legal advice with the attorney or attorneys of the public body) and (A)(4) (discussion or

consultation with the attorneys of the public body in order to consider its position and instruct its attorneys regarding the public body's position regarding contracts that are the subject of negotiations, in pending or contemplated litigation or in settlement discussions conducted in order to avoid or resolve litigation), the Regional Council met in a joint executive session with the RTA Board of Directors for legal advice and possible instructions regarding a Notice of Claim from the former executive director and related matters.

**1:19 p.m.:** Motion was made by Mayor Jon Post, Town of Marana, seconded by Mayor Tom Murphy, Town of Sahuarita, and unanimously carried that the Regional Council of Pima Association of Governments recess the PAG Regional Council meeting. The Regional Council will reconvene with the RTA Board of Directors in closed Executive Session at the end of the RTA Board Meeting.

**2:04 p.m.:** The Regional Council reconvened in closed Executive Session.

**3:35 p.m.:** Motion was made by Mayor Joe Winfield, Town of Oro Valley, seconded by Mayor Regina Romero, City of Tucson, and unanimously carried that the Regional Council of Pima Association of Governments and Regional Transportation Authority (RTA) Board of Directors instruct Counsel and the Executive Director to proceed as discussed in Executive Session.

**12. Adjournment**

The meeting was adjourned at 3:38 p.m.

## Regional Council Meeting Summary

Meeting Summary of Thursday, December 4, 2025

Full Video Recording (YouTube): [YouTube Recorded Meeting](#)

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*"We encourage and uphold the importance of regional collaboration as the Regional Council addresses regional priorities and pursues regional solutions."*

To view the full Regional Collaboration and Unity Pledge, visit [PAGregion.com/pledge](#)

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**Regional Council Members Present:** Mayor Jon Post  
General Ted Maxwell  
Mayor Tom Murphy  
Supervisor Matt Heinz  
Mayor Roxanna Valenzuela  
Mayor Joe Winfield  
Chairman Verlon Jose  
Chairman Julian Hernandez  
Mayor Regina Romero

**Regional Council Members Absent:** None

**Staff Lead:** Michael J. Ortega, P.E., Executive Director

The following is an audio-to-text transcription of the Regional Council Meeting held on Thursday, Dec. 4, 2025, and is being used as the written summary of the discussion. Minor changes were made to the transcription to include grammar or formatting for clarity, YouTube links/time stamps, spelling corrections and the addition of the agenda number or items based on the posted agenda.

## Agenda

### 1. Call to Order (12:09 p.m.)

#### [Item #1 Video Link](#)

**Mayor Romero:** Good afternoon, everyone. Thank you so much for waiting for me. I was having lunch because I was starving. But thank you for joining us. Do we have anyone with us online? OK, so we will call this meeting to order. I think we have to do roll call first, correct? Roll call.

#### **MEMBERS PRESENT AT ROLL CALL:**

- Mayor Joe Winfield
- Mayor Tom Murphy
- Mayor Roxanna Valenzuela
- Chairman Julian Hernandez
- General Ted Maxwell
- Mayor Jon Post
- Mayor Regina Romero

**Mayor Romero:** Please join me for the Pledge of Allegiance.

**All:** I pledge allegiance to the flag of the United States of America and to the Republic for which it stands, one nation under God, indivisible, with liberty and justice for all.

**Mayor Romero:** Thank you so much. Really appreciated. Item number 2 is call to the audience. Do we have any people waiting for a call to the audience?

### 2. Call to the Audience (Remote Access Option)

#### [Item #2 Video Link](#)

**Adam Ledford:** Madam Chair, we do have a speaker today. As a reminder, speakers are limited to a three-minute oral presentation and may submit written comments of any length for the council's files. Calls to the audience are limited to 30 minutes. Individual council members may respond to criticism made by those individuals who have addressed the council. However, the council will not discuss or take action on a matter raised during a call to the audience that is not

already on the agenda. And today we have Mr. J.P. Salvatierra. Thank you, Mr. Salvatierra. You are now in front of the Regional Council. If you would start your comments by stating your name on the record and, after that, you'll have 3 minutes to address the PAG Regional Council. At the two-minute mark, I'll politely hold up a finger to let you know you have 1 minute remaining.

**Speakers List (with audio links):**

- [J.P. Salvatierra](#)

**Adam Ledford:** Thank you, Speaker. Madam Chair, at this time, that's all the speakers that we have.

**Mayor Romero:** Thank you so much, Mr. Ledford. And we move on to item 3, meeting summary approvals.

**3. Meeting Summary Approvals**

[Item #3 Video Link](#)

**Mayor Murphy:** Move to approve.

**Mayor Romero:** There's a motion to approve. May I have a second?

**Mayor Winfield:** Second.

**Mayor Romero:** There's a motion and a second. Any further discussion on this motion? Hearing none, all those in favor please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries. And I just want to let the record show that Regional Council Member Heinz and Regional Council Member Jose have joined us at the table. Thank you so much for joining us. Appreciate you two. We move on to item 4, consent agenda items.

**4. Consent Agenda Items**

[Item #4 Video Link](#)

**Mayor Post:** Move to approve.

**Madam Chair:** There is a motion to approve, and may I have a second.

**Mayor Murphy:** Second?

**Mayor Romero:** A motion and a second. Any further discussion?

**Mayor Winfield:** Madam Chair.

**Mayor Romero:** Yes, Council Member Winfield.

**Mayor Winfield:** So, just one comment on item B. The Oro Valley or Town of Oro Valley would like to request that a sentence or two be added that just gives a brief explanation as to what the contract is and some brief financial information that's related to those contracts that would facilitate the review of those. So, again, we're just asking for a sentence or two, and then financial summary information. Thank you.

**Mayor Romero:** So, that is just additional language.

**Mayor Winfield:** Yes.

**Mayor Romero:** OK. Perfect. Any further discussion on this item? Hearing none, all those in favor, please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries. Item 5, PAG Regional Active Transportation Plan. I know that PAG staff has a prepared presentation. Ms. Hannah Oden is at the podium to give us a presentation. Ms. Oden?

## 5. PAG Regional Active Transportation Plan (RATP)

### [Item #5 Video Link](#)

*PAG Planning Manager Hannah Oden provided the Regional Council with a presentation regarding the RATP which included the key elements of the plan. Links to the YouTube Recording and presentation slides are below.*

- [Staff Presentation to Regional Council - Item #5](#)

- [Item-5-Final-Draft-RATP-Plan-Presentation.pdf](#)

Following the presentation, the Regional Council continued discussion.

**Mayor Romero:** May I have a motion please to approve the RATP?

**Mayor Murphy:** Move to approve.

**Mayor Romero:** There's a motion, is there a second on the motion?

**Mayor Post:** Second.

**Mayor Romero:** Any discussion? I do have some commentary. I think that now having this information with us to be able to put it to work is going to be key. I think that we've all seen the stories in the paper, right? The pedestrian and bicycle crashes and the lack of safety on our streets for pedestrians and bicyclists, and so I'm glad that there's a lot of examples of how we can create more safety. The safety of people walking and biking is a huge problem and it's not just happening here in Pima County or in Arizona, it's happening throughout the country. And I don't know if you all read the story in the Arizona Daily Star, it was a front-page article talking about the problems regarding the safety of pedestrians and bicyclists throughout the country. And it is a huge issue that we really do have to tackle together. I did bring a memo, but that's going to be later on in the meeting, requesting that we, as Pima Association of Governments, take a look at how to make pedestrian and bicycle safety that much better as a region. I think we need to tackle this. I'm happy that PAG is taking an active role in creating a plan within the regional active transportation system, and I think that moving forward our role as Pima Association of Governments and a planning organization, this piece will be super important for us to tackle: pedestrian and bicycle safety. I also understand that Pima County, together with the City of Tucson, was successful in being selected for Safe Streets for All, a grant, and we are collaborating and putting together an action plan. I don't want us to do work that is already being done, so it might be a good idea to have Pima County present, maybe present to staff at PAG and see how we can further collaborate with pedestrian and bike safety in our community. So I just wanted to add that. I don't know if any others have some questions or comments.

**Mayor Winfield:** Miss Oden, the Town of Oro Valley is working on a similar effort that parallels this nicely, and I know our staff has been working with you. When our plan is completed, is there a process so that the information in the Town of

Oro Valley plan, that's not reflected in this, can be integrated or incorporated? Is there a process to do that?

**Hannah Oden:** Madam Chair, Mayor Winfield, I could think that maybe information efforts could go into the next RMAP cycle. It's also our long-range transportation plan.

**Mayor Winfield:** And that cycle is what?

**Hannah Oden:** So, it was just approved earlier this year, so in another, it'll be four years from now, roughly.

**Mayor Winfield:** Thank you.

**Mayor Murphy:** I'd just be interested when you do have that presentation by the County, I'm not clear if it's just working with the City on those proposals or working with all the municipalities. We all participated recently on an economic development plan the County's working on, so I'll just be curious to make sure that it's all inclusive with all of our –

**Mayor Romero:** And it might be, it might be a council member, it might be a good conversation to have at the table.

**Mayor Murphy:** Right.

**Mayor Romero:** With all of us so that we can, the issue is not having to do the same work.

**Mayor Murphy:** Multiple times.

**Mayor Romero:** Multiple times. Maybe it's an opportunity to include your town's input into what's happening with the Safe Streets for All action plan. We can talk further in terms of how to itemize it at the next PAG meeting, but it might be a really good conversation for all of us to have at this table.

**Mayor Murphy:** Thanks.

**Mayor Romero:** All righty. So, there's a motion and a second. Any further discussion or comments?

**Michael J. Ortega:** Madam Chair, I just wanted to point out the RTA Next plan has \$254.6 million for safety and active transportation. The idea is this will set some of the framework for that. The conversations that happen can already basically be guided by what you've seen. So, I think it's important to mention that there's already a plan for investment, assuming that RTA Next is successful in March. But I wanted to point that out and remind you that that's already included. Thank you.

**Mayor Romero:** Yeah, that's a great point. Council Member Maxwell.

**General Maxwell:** Madam Chair, since the Executive Director brought it up, I think it's really important to remember that often these plans are great, but if they don't have funding behind them, it becomes a challenge, so we have to think about that. And it's not just the \$254 million that's in the safety for an active transportation category that makes these types of improvements. Every single road project that is in there will also have both the safety and the active transportation aspects built into the project so when you look at it's a lot more than \$254 million in the RTA Next. It's probably closer to \$1.4 billion or 1.5 billion when you add up the different areas that all contribute to that safety and back to transportation.

**Mayor Romero:** That's right. Council Member.

**Mayor Murphy:** Can I just piggyback off of that? The other advantage is if it does pass, when it passes, it also frees up the PAG money that's been dedicated. So, it compounds. It's the road projects, it's the dedicated funding, and also as those needs become apparent as we move forward, that those PAG monies are also available, which we've used over the years before. We were sweeping them to try to continue our commitment to RTA 1.

**Mayor Romero:** So, it further highlights that the need to have this conversation as a Regional Council. Councilmember Jose.

**Chairman Jose:** Good day to everyone, Madam Chair, Honorable Board Members. All I have to say is as long as South Tucson, Pascua Yaqui and Tohono O'odham Nation are not forgotten and pushed to the wayside. Thank you.

**Mayor Romero:** Absolutely. Absolutely agree. Council Member Heinz.

**Supervisor Heinz:** Thank you. I understand that earlier on with regard to the methodology here, I know City of Tucson staff and Pima County staff as well as I believe Town of Marana staff had some concerns about specifics of the methodology and how this was conducted. So can we just clarify, for me, for the group here, what we're approving, like prescriptive dollars will go in these buckets kind of thing, or is this more of a guide? Because I'm just trying to figure out what is going to be happening because of this plan specifically and what does this vote exactly mean?

**Michael J. Ortega:** Madam Chair, I'll take a stab at that. I think that question did come up actually at the TMC as well. And the concern was the prescriptiveness or is this a prescriptive recipe if you will for how these dollars would be expended? The short answer is no. This is a guide in terms of what the region's priorities are today, right this minute, but it obviously has opportunity, particularly when we start getting into the detail of the RTA Next investments, as well as the regional fund investments down the road, there is flexibility. So, this is intended to be the guide for the region in terms of the information that we gathered, but it is not intended to be prescriptive and said we can only stay within this plan. That is not the intent.

**Mayor Romero:** Any others? All righty, if no other points of discussion, all those in favor of the motion please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries. Item 6. When I find it, is Dial-a-Ride Microtransit Service Area Analysis. Miss Oden and Mr. Preston McLaughlin are going to present on this, too.

## 6. Dial-a-Ride and Microtransit Service Area Analysis

### Item #5 Video Link

*PAG Planning Manager Hannah Oden and Transportation Mobility Manager Preston McLaughlin provided the Regional Council with a presentation detailing the Dial-a-Ride and Microtransit Service Area Analysis. Links to the YouTube Recording and presentation slides are below.*

- [Staff Presentation to Regional Council - Item #6](#)
- [Item-6-Dial-a-Ride-and-Microtransit-Final-Report.pdf](#)

**Following the presentation, the Regional Council continued discussion.**

**Mayor Romero:** Any questions?

**Mayor Murphy:** Madam Chair.

**Mayor Romero:** Council Member Murphy.

**Mayor Murphy:** Well, one, I'm personally pretty excited about this. I've been following the microtransit movement, across the country and it seems like it's more personalized, more effective, more flexible, so I'm happy to see we're moving in this direction personally. I do have a question though for other areas of unincorporated Pima County, what does it take to actually qualify because of my previous life doing some other things. I think of Amado, Aravaca, Elephant Head, and Three Points, some of those areas that really have a struggling demographic. And transportation is usually the linchpin from it. So I'm just curious on where you have to get to to actually be included, I know we're beginning on this, but the smaller areas, how do we help meet their needs in the future?

**Preston McLaughlin:** Thank you for that question, Mayor Murphy. So first and foremost, the microtransit zones and the eligibility criteria, at least for what we're envisioning, it would be similar to our general public Dial-a-Ride services where everyone, you don't have to qualify per se. The only qualification would be if you live, not even if you live, if your origin and destination are both within the service area boundary, then you're able to take it. So, there isn't any sort of eligibility. Anyone can theoretically be provided with these services in the future if we decide to move forward and implement them. In terms of other unincorporated areas of the County that could potentially benefit from microtransit service, I know and maybe Kimley-Horn, staff from Kimley-Horn or Hannah could add to this, but I believe we looked at the county as a whole, and at least at this point in time, in terms of the demographics, the population, urban density, so on and so forth. These 13 zones were the zones that made the most sense and where transit service isn't really available, and the gap would be filled with the microtransit service typically in the suburban rural areas. I would say, if population continues to increase in these communities, then we can reassess and determine if microtransit is a good fit for those communities. I think at this point, they weren't targeted and picked out. But that doesn't mean in the future if demographics change and population increases and the need is there, we can

always reassess, reevaluate and run a similar type of analysis to determine if it makes sense.

**Mayor Murphy:** Right. I know this is the beginning of it. So, I appreciate that. But of course, keeping the whole County in mind as we move forward.

**Preston McLaughlin:** Absolutely.

**Mayor Romero:** Council Member Jose.

**Chairman Jose:** Thank you for the presentation. What would be some of the restrictions or unallowable services provided? Is there anything that you would say, I'm just trying to think. I don't know of any. I'm just asking if there's anything that you know that would not be allowable or would not restrict someone from utilizing the services.

**Preston McLaughlin:** Thank you for the question, Council Member Jose. No, in theory, this service should be available to everyone. Again, the only parameters would be that where they're going and where they're being picked up need to be within the service area boundary unless, I guess the caveat is there are certain nodes outside of the service area that are considered key destinations like hospitals and major shopping centers where they could theoretically go outside that boundary. But in terms of who is eligible, everyone should be eligible. Obviously, there's going to be rules and policies for the riders. And if they are unruly or prevent some sort of safety hazard for other riders or drivers, then there could be suspension. And those individuals probably couldn't utilize the service but other than that, the service should be available for everybody.

**Chairman Jose:** Thank you for that. You're going to need a really big truck to come to my house. Thank you.

**Mayor Romero:** Chairman, I mean Council Member.

**Mayor Winfield:** Oro Valley was illustrated in your presentation as a successful Dial-a-Ride and growing program. Is the vision or intent of the microtransit, let's say in relation to the Oro Valley area, that this would be an additional alternative or option for our residents, the microtransit, and not replace the Dial-a-Ride?

**Preston McLaughlin:** Yeah, so, I believe the intent would be to replace the existing Dial-a-Ride with the microtransit model, where it's basically the same

thing. The only main difference I would say is that instead of booking 24 hours in advance, residents of Oro Valley could just book at that moment and be picked up within a 30-minute window. But the operational aspect of things shouldn't deviate very much from the actual Dial-a-Ride service being provided in your community right now. So, it would only be an enhancement. It would cost a little extra, obviously, but it would be a lot more convenient for riders to get on an app, book a trip, and then be picked up in 30 minutes versus having to call in 24 hours, at least 24 hours, in advance to book that trip.

**Mayor Winfield:** Thank you.

**General Maxwell:** Council Member Maxwell.

**General Maxwell:** Thank you, Madam Chair and Mayor Winfield. You set up my question perfectly. So you had the numbers up there, I think \$12 million annually, and you threw out a number to get all the financials. So there's the financials. Does that, the cost of actually running it, what it's up and running, and what kind of savings does it get us from what we're currently expending if it's going to be replacement? So, we're not looking at that, or is that the differential?

**Preston McLaughlin:** It's my understanding that these numbers do account for the replacing of the existing services. So that would be the net increase to provide all of those services. That doesn't mean we need to provide all 13. That would be in the scenario if we did provide all 13 services. That's how much it would cost on an annual basis to provide transit service to all of those zones. You can, mix and match and pick.

**General Maxwell:** And clarify that includes the funding that like Oro Valley's already receiving for their Dial-a-Ride. That would be in addition to the Oro Valley line up there.

**Preston McLaughlin:** Yeah, so the cost of service to run the Oro Valley Dial-a-Ride was subtracted from this total calculation, and then the Oro Valley microtransit option was then added. So, it does cover the difference and it would be more, it would just be the increase when you subtract what they're currently paying to operate their Dial-A-Ride. And then just on top of that, Mariate or Hanna, is that accurate, just to confirm.

**Mariate Echeverry:** Yes. This is the net cost. But the cost that is the operational cost is currently taken into consideration.

**General Maxwell:** Yeah, I'm purely just trying to get if that's additional to what we're currently spending or it is. So that's an additional amount of money we'd have to come up with every year on top of what we're currently spending for Dial-a-Ride and other services.

**Mariate Echeverry:** Yeah, it will be additional. Yes.

**General Maxwell:** OK. Thank you. Thank you, Madam Chair.

**Mayor Romero:** Any others? And this is for information only. All righty. If there's no additional questions or comments, we're going to move on to our next item.

**Preston McLaughlin:** Thank you.

**Mayor Romero:** All righty. We're moving on to item 7, Social Services Planning Subcommittee - Social services Block Grant. Our presentation will be given by Genine Sullivan. Thank you, Ms. Sullivan.

**7. PAG Social Services Planning Subcommittee – Social Services Block Grant**

**Item #7 Video Link**

*PAG Transportation Mobility and Accessibility Program Manager Genine Sullivan provided a report on the Social Services Block Grant for State Fiscal Year 2027. Link to the YouTube Recording is below.*

- **Staff Presentation to Regional Council - Item #7**

Following the presentation, the Regional Council continued discussion.

**Mayor Romero:** Thank you so much for the presentation. May I have a motion to approve the recommendations in the report?

**Mayor Winfield:** I move to approve.

**Mayor Romero:** OK, there is a motion to approve the recommendations in the report.

**Mayor Murphy:** Second.

**Mayor Romero:** A second. And any discussion or questions on this item?  
**Council Member Maxwell.**

**General Maxwell:** I just have one question. So the total was \$1.4 million and that's because that's what's we typically receive. Is it a competitive process up there? I mean, do we give up money by not applying for more or is it already how it's split up between the different counties or the different municipalities or the different MPOs? Is that already predetermined?

**Genine Sullivan:** That's a great question. Thank you for asking. The Department of Economic Security, they provide us the funding and service intents for the respective state fiscal year. We don't really have any input on that. And then through this process, we provide recommendations to you, the council. And then with your approval, it gets submitted to Department of Economic Security. The committee can provide additional insights in terms of what they would like to see the funding increase to or how monies could potentially move from one division to another. But that's the extent of our input. And with that feedback, the Department of Economic Security and through their process, they would decide what shifts need to be made with regard to the different funding levels for our region or any other region. But just to point as an example, based on the recommendations that the committee provided when we were doing this process for state fiscal year 2026, they took that input and actually made shifts in the funding amounts that resulted here, that you're seeing in the funding allocations for state fiscal year 2027.

**General Maxwell:** OK. I appreciate that and I guess, yeah it's a good answer because as long as we're not saying OK, this is what we normally get. So, this is what will fill because I'll tell you from being on the State Transportation Board, if all the municipalities did that, a lot of them would get nothing. So, you don't get what you don't ask for. So, if there's a need in the community, I'd suggest that we sometimes push the number a little bit because ultimately, I understand it's out of our control. DES is gonna be the deciding factor. But those who speak the loudest often get what they need, and so I just don't want to make sure we're not just settling and saying OK we know this is we're going to get \$1.4 million. This is how we'll do it, this is how if we've got a greater need we've got to be willing to step forward and ask.

**Genine Sullivan:** Thank you, Chair.

**General Maxwell:** They can always say no.

**Mayor Romero:** Well, and Council Member Maxwell, I was thinking the same thing, right? Is there any possibility of with our motion to approve, is there a possibility of being able to ask for more money, right? The needs are great. And then my question was going to be, is there a possibility of expanding the uses based on the needs? In other words, we are seeing a huge need in mental behavioral health. We are seeing a huge need in substance use disorders. How can we request additional support and funds from the state to be able to serve, un-sheltered homelessness is a huge issue throughout Pima County. So how do we ask for more and for additional categories?

**Genine Sullivan:** Thank you, Mayor Romero, and thank you Council Member Maxwell. I appreciate your questions. Mayor Romero, to address your question, I wrote some notes down based on what you shared, and I think what might be appropriate to do is go ahead and reach out to the Department of Economic Security to the appropriate contacts and ask for what is the methodology to provide that feedback and see what the next steps would be.

**Mayor Romero:** Would you want us to add to our motion to approve an additional caveat of requesting additional funds for additional uses? Would that be appropriate?

**Genine Sullivan:** I'm happy to submit that as part of our process –

**Mayor Romero:** Mr. Ortega is shouting over there "yes" and I see Council Member Valenzuela also nodding her head. Councilmember Jose.

**Chairman Jose:** Thank you for the information. I mean that should be part of our regular practice all the time. What I heard you say is do you want to make the most noise? Not all the time, but if we remain silent, then we'll never get it. We'll just remain status quo. And there is a need out there. We see it all the way around us. And we should be able to, in our respective positions, to also advocate on behalf of this project, so forth. So I think it should kind of be always that motive that we need additional more, but we need to be careful because when we do get it, we need to make sure that we're expanding it for its purposes, because if we're not and we're asking for more, and if I was the funding agency, I'll say, "Well, look, you got this, but you didn't do that." And either, I don't think there's something that's too much money. There's either not enough, not enough to do the things you want to do, and you have to kind of piecemeal it together. But there's always going to be a need. It's around us. And the challenges of

yesterday are different today and will be different tomorrow. So, we should always be thinking that way, forward thinking about, it doesn't take put a whole report together because if we just look at our communities, the challenges. Every community is different, and it makes me really sad, when I see these challenges when I drive down the streets. So, there's no reason why we shouldn't be continuously advocating for additional funding, additional services and so forth. But we also have that plan in order to deliver that with the funding that's available. Those are my thoughts. Respectfully, and if that's in someone's motion, then increase it. I know she said something about with no changes, but I think that just approving as it is. And if there's an opportunity, go back to DES. What do we need to do? I heard her say something about, there's some discussion before that. I think each one of us sitting around this table can also advocate in the right times in the right places. Hey, take a look at this. My thoughts respectfully. Thank you.

**Mayor Romero:** Thank you, Council Member. Will the motion maker consider an addition to the motion?

**Mayor Winfield:** Yes, I'd certainly welcome the amendment. I appreciate Council Member Maxwell getting this discussion started but would certainly amend the motion to include directing staff to request additional funding and services as related to this item.

**Mayor Murphy:** I agree as well.

**Mayor Romero:** Seconder will agree and Councilman Jose doubles the second. Thank you Councilmember Maxwell and Valenzuela for encouraging this discussion and some of the additional possibilities of adding additional categories as well if that's OK. All righty, so there's a motion, a second, any further discussion on this item? Hearing none, all those in favor please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries. Right. Thank you.

**Mayor Winfield:** I don't know if we need to, we lost Supervisor Heinz. I don't know if it's gone permanently –

**Mayor Romero:** I'm not sure, where, oh, there he is. OK. We have him here with us. And so, we'll note that he also voted for this item as well. OK. Perfect. I've got a thumbs up over there. Item 8 is the 2025 PAG Title VI Implementation Plan, and we are going to receive a presentation by Preston McLaughlin.

8. 2025 PAG Title VI Implementation Plan

**Item #8 Video Link**

*Transportation Mobility Manager Preston McLaughlin reported on this item on behalf of Philana Jeremiah who is PAG's Title VI Coordinator. Link to the YouTube Recording is below.*

- **Staff Presentation to Regional Council - Item #8**

Following the presentation, the Regional Council continued discussion.

**Mayor Romero:** Any questions or comments. Actually, I think you need an approval, correct?

**Preston McLaughlin:** Yes.

**Mayor Romero:** OK.

**Mayor Winfield:** I move to approve

**Mayor Murphy:** Second.

**Mayor Romero:** There is a motion to approve in a second. Any discussion on this item? I am going to add some discussion to this item because this is an item that I have been really taking a look at since I first got here. So Mr. Ortega, if you allow me to give some input. I think that the document is written well and it's been getting better and better every year that we discuss this. We need to make sure that we, PAG, emphasize our commitment for continuous improvement of the Title VI Plan and that we get better and better every year. I believe that highlighting PAG's focus on reaching underserved and historically marginalized populations, improving our data collection, improving our outreach methods and engagement strategies to ensure all voices are meaningfully included in this plan as we move forward is very, very important especially the hard to reach elderly, our relatives, and the indigenous nations within our community, in rural areas of

our community that have great need. And of course, historically marginalized populations really need to, the Title VI report really needs to reflect that work. And how we are going to address those needs from those populations through our planning, both transit and transportation and other issues that we should be talking about at this table. The Title VI Plan needs to go into detail in terms of how we're going to reach, but how we're going to correct the needs of those communities through funds from both PAG and as a consequence RTA as well. I think we need to underscore the importance of more clearly demonstrating our planning efforts, how we're going to deliver additional funds to make sure that we're addressing the inequities that really have been historically, through generations and decades, been existing for a long time. And then finally, affirm that the Title VI Plan should tell a more complete and transparent story of our progress. So these are our needs. This is how we're going to attend to them and this is the progress that we are making with our Title VI planning. Where we're doing well, where we're not doing great, where we need to improve, and how we will measure the success moving forward. I think that's my input in terms of how we make this report better and more meaningful. But other than that, I think this report has been getting better and better every year.

**Michael J. Ortega:** Thank you, Mayor.

**Mayor Romero:** Other than that, any other questions, observations, comments? Hearing none? All those in favor of the motion, please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries. And we move on to item 9, Executive Director's Employment Agreement. Ms. Lisa Anne Smith will give us a report.

#### 9. Executive Director's Employment Agreement

[Item #9 Video Link](#)

**Lisa Anne Smith:** Thank you, Madam Chair. I prepared a new form of contract for the Executive Director based on the input from the board at the last meeting. The primary change is that it is a term contract through the end of December 2026 subject to annual renewal thereafter. If you have any questions, I'd be happy to answer them.

**Mayor Romero:** Any questions, comments?

**Mayor Winfield:** Move to approve.

**Mayor Post:** Second.

**Mayor Romero:** There is a motion to approve in a couple of seconds. Any additional questions or comments? Discussion? Hearing none, all those in favor of the motion, please signify by saying aye.

**Members:** Aye.

**Mayor Romero:** Any against? Motion carries unanimously. Thank you so much. We're moving on to item 10, Request for Future Agenda Items.

**10. Request for Future Agenda Items**

**Item #10 Video Link**

**Mayor Romero:** All right, so this is a new item that we've just currently added to this particular meeting. One of the reasons that Council Member Post and I really wanted to add this item to the agenda is to be able to have some preliminary, not discussion, but an advance of future items and give the opportunity to any of the Council members at this table to add items that you wish to discuss at our next meeting. I know that Council Member Heinz was thinking of adding something, but I wanted to, as I gave you the preview beforehand, that I would like to add an item to our following meeting to discuss the role PAG serves in providing planning support for traffic safety region-wide. In particular, I'm interested in improving safety for our most vulnerable users of the transportation system, those that are walking and biking. Far too many people have died on our roads and it's not particular to Tucson right? It's happening throughout Pima County. And I would like to be able to have a conversation about how we work together to make sure that we are putting together an action plan. As I said previously, Pima County and the City of Tucson received a grant to put an action plan together for bike and peds. If it's possible that we merge these efforts or at least have PAG collaborate and give input to that process, that would be wonderful. So, I'll give you all a memo and if there's any other of my colleagues, Council Member Maxwell.

**General Maxwell:** Thank you, Madam Chair. I think these are the kind of topics that you know too often when we get wrapped up and are trying to get to the next

thing that we have to get across the line, we forget about going back and taking a look at this. What I would ask to really highlight, that if it's something I don't know if I've really seen it, that's a single document that shows us where are the most areas that need most emphasis throughout the entire County. So, we can take a look at just the sheer numbers where they're happening. You can't address the problem unless you really understand it. So, we've got to know where the challenges are and then what's leading to those areas being challenges because sometimes we think the solution may be one and it's really something else that will stop the deaths and accidents from happening. So I appreciate you bringing that up.

**Mayor Romero:** Thank you so much, Council Member Heinz.

**Supervisor Heinz:** Thank you, Chair. I would like to add on a future meeting, which does this just go to the next one, like Jan. 29, or is it? OK. The discussion of expanding the membership of this body. So, I think it makes a lot of sense in other similar entities and other jurisdictions, for example, they have like a transit dedicated person. So like the City of Tucson obviously would, I think, benefit from having a transit member. And like the University of Arizona clearly runs a transit program as well, and they are a population of 50,000 by themselves. I don't need to get into all the details of the item but I think we can talk about just kind of in terms of best practices other similar regional councils have additional membership and my reading of the statute, and I was a legislator for 4 years, so that just makes me really dangerous. But I believe, and our council can do a thorough review of this and tell us next time, I believe it's some simple majority vote of this group. I don't think it has to go to the voters. I don't think that we need the statutes, the statutes changed or anything like that. And also the inclusion of transit members, and we can talk about like airport authority and stuff like that too. But in the inclusion of transit members I believe is actually in the state handbook governing these entities. So, this is definitely a best practice that we should consider doing.

**Mayor Romero:** Will we expect a memo requesting the item? Awesome.

**Supervisor Heinz:** Yes, I'll do that for the January meeting.

**Mayor Romero:** Excellent. Thank you so much. All right. Any others? OK. Then we move on to item 11, which is an Executive Session.

11. Executive Session

[Item #11 Video Link](#)

**Mayor Romero:** Do I need to read the Pursuant to ARS language?

**Lisa Anne Smith:** Yes, my suggestion is that you read the language and get a motion to convene an executive session at the end of the RTA meeting and to recess this meeting until then and then have the executive session jointly with the RTA board.

**Mayor Romero:** OK. Pursuant to A.R.S. § 38-431.03 (A)(3) (discussion or consultation for legal advice with the attorney or attorneys of the public body) and (A)(4) (discussion or consultation with the attorneys of the public body in order to consider its position and instruct its attorneys regarding the public body's position regarding contracts that are the subject of negotiations, in pending or contemplated litigation or in settlement discussions conducted in order to avoid or resolve litigation), the Regional Council meet in a joint executive session with the RTA Board of Directors for legal advice and possible instructions regarding a Notice of Claim from the former executive director and related matters. May I have a motion to proceed into an executive session at the end of the RTA meeting.

**1:19 p.m.:** Motion was made by Mayor Jon Post, Town of Marana, seconded by Mayor Tom Murphy, Town of Sahuarita, and unanimously carried that the Regional Council of Pima Association of Governments recess the PAG Regional Council meeting. The Regional Council will reconvene with the RTA Board of Directors in closed Executive Session at the end of the RTA Board Meeting.

**2:04 p.m.:** The Regional Council reconvened in closed Executive Session.

**3:35 p.m.:** Motion was made by Mayor Joe Winfield, Town of Oro Valley, seconded by Mayor Regina Romero, City of Tucson, and unanimously carried that the Regional Council of Pima Association of Governments and Regional Transportation Authority (RTA) Board of Directors instruct Counsel and the Executive Director to proceed as discussed in Executive Session.

## 12. Adjournment

The meeting was adjourned at 3:36 p.m.

### CERTIFICATION

I hereby certify that the foregoing is a meeting summary of the Pima Association of Governments (PAG) Regional Council meeting held on Dec. 4, 2025. This summary is not intended to be verbatim. It serves as the summary of action items taken at the meeting upon approval by the PAG Regional Council. An audio recording is available upon request and serves as the official minutes. I further certify that a quorum was present.



\_\_\_\_\_  
Michael J. Ortega, P.E.  
Executive Director

*In compliance with the Arizona Open Meeting Law, the PAG Regional Council legal actions and this meeting summary are posted online, and an audio recording which serves as the official minutes of the meeting is available upon request. In addition, a meeting video is also available at: [YouTube Recorded Video](#)*



December 4, 2025

Dear Board Colleagues,

I am pleased to see the Regional Active Transportation Plan included in our December 4 meeting material. Traffic safety was highlighted in the media during the month of November 2025 and not just because of the deeply tragic deaths of three University of Arizona students at 2<sup>nd</sup> St-Euclid Ave. An article published in the Arizona Daily Star on November 23, 2025<sup>1</sup> highlighted US DOT's National Highway Traffic Safety Administration statistics that across the US, "traffic deaths are up 20% from a decade ago, from 32,744 in 2014 to 39,345 in 2024." Pew Research Center data referenced, which was published last year, indicate that Americans are "driving more dangerously." Additionally, "out of 29 high-income countries, America ranks at the bottom of road safety... this spike is not... a global trend. The U.S. is an outlier."

I respectfully request a future agenda item to further discuss the role PAG serves in providing planning support for traffic safety, regionwide. In particular, I'm interested in improving safety for our most vulnerable users of the transportation system, people walking and biking. Far too many people have died on our roads, and together we can have an impact on improving safety for all users of the regional transportation network.

In Community,

Regina Romero  
City of Tucson Mayor and PAG Chair

CC:  
Michael Ortega, Interim Executive Director of the Regional Transportation Authority

## APPENDIX K – FHWA/FTA TITLE VI IMPLEMENTATION PLAN CHECKLIST



1801 W. Jefferson St.  
Phoenix, AZ 85007

KATIE HOBBS  
GOVERNOR

JENNIFER TOTH  
DIRECTOR

### FHWA/FTA Title VI Implementation Plan Checklist

This checklist details the FHWA/FTA Title VI requirements for a Title VI Nondiscrimination Plan for ADOT subrecipients.

COG/MPO Title VI Requirements for Title VI Nondiscrimination Plan	Yes	No	Comments
<b>1. POLICY STATEMENT:</b> <ul style="list-style-type: none"><li>The policy statement should be signed by the Chief Manager, Chief Executive Officer, or Director of Transportation.</li><li>Includes basis of Title VI (race, color, national origin)</li></ul>			
<b>2. STANDARD DOT ASSURANCES:</b> <ul style="list-style-type: none"><li>Signed by head of the Agency: Executive Director, Transportation Director, or Head of the Operating Administration</li><li>Include Assurances A, B, C, D, E</li><li>Include the Agency's name in the Assurances</li></ul> <p><a href="#">23 CFR 200.9(a)(1), 49 CFR 21.7 and USDOT Order 1050.2A</a></p>			
<b>3. NOTICE TO THE PUBLIC:</b> <ul style="list-style-type: none"><li>Include the name and contact information of the Title VI Coordinator</li><li>Indicate where in the office the notice(s) of the public is located. Example: front desk, lobby, etc.</li><li>Includes basis of Title VI (race, color, national origin)</li><li>Includes information on filing a Title VI complaint</li></ul> <p><a href="#">FTA Title VI C 4702.1B Appendix B</a></p>			
<b>4. DISSEMINATION OF TITLE VI INFORMATION: PUBLIC OUTREACH</b> <ul style="list-style-type: none"><li>Describe your Agency's processes to inform the public of Title VI information, include any tools, techniques, or strategies used to involve and educate the public of the project or Title VI information:<ul style="list-style-type: none"><li>informing the public of the protected basis under Title VI and in turn for the project utilizing the FHWA funds.</li><li>Information on how to file a Title VI complaint against a project</li></ul></li><li>Notice to the Public<ul style="list-style-type: none"><li>Include the name and contact information of the Title VI Coordinator</li></ul></li></ul>			

<ul style="list-style-type: none"> <li>○ Indicate where in the office the notice(s) of the public is located. Example: front desk, lobby, etc.</li> <li>○ Include bases of Title VI (race, color, national origin)</li> <li>○ Include information on filing a Title VI complaint</li> <li>● VIRTUAL PUBLIC INVOLVEMENT (VPI) <ul style="list-style-type: none"> <li>○ Describe how your Agency conducts Title VI compliance in virtual public outreach</li> </ul> </li> </ul> <p><b>LANGUAGE ASSISTANCE</b></p> <ul style="list-style-type: none"> <li>● Include a statement in the Title VI plan stating that "a Four Factor Analysis will be conducted on a project by project basis"</li> <li>● Conduct a Four Factor Analysis for the Agency's boundaries. Languages can be gathered using the U.S. Census Bureau table C16001: <a href="https://data.census.gov/">https://data.census.gov/</a>. <ul style="list-style-type: none"> <li>○ This data should be renewed annually and should include the most recent available data.</li> <li>○ Take note of any languages that meet the "Safe Harbor Threshold."</li> </ul> </li> <li>● For languages that include "unspecified" languages, you can include the Agency's data if you are aware of what these specific languages are.</li> <li>● Indicate how the agency informs the public that translation and interpretation services can be available.</li> <li>● There should be no indications that language assistance will only be available if requested within a specified time frame. Language services should be available, if requested.</li> </ul> <p>23 CFR 200.9(b)(12)</p>			
<p>5. <b>DEMOGRAPHIC PROFILE:</b></p> <ul style="list-style-type: none"> <li>● A demographic profile of the metropolitan area</li> </ul> <p>FTA Title VI C 4702.1B Chapter VI-1, Appendix I</p>			
<p>6. <b>ORGANIZATION &amp; STAFFING:</b></p> <ul style="list-style-type: none"> <li>● Identify the Title VI Coordinator</li> <li>● Show how the Title VI Coordinator has direct access to the head of the agency</li> <li>● Include an Organizational chart that shows the placement of the Title VI Coordinator position/title.</li> </ul> <p>23 CFR 200.9(b)(1)&amp;(2)</p>			
<p>7. <b>EXECUTIVE BOARD REVIEW APPROVAL:</b></p> <ul style="list-style-type: none"> <li>● Include a statement that the Executive Board or Regional Council will review and approve the Title VI Implementation Plan</li> </ul>			

<ul style="list-style-type: none"> <li>Include a copy of the minutes indicating such approval</li> </ul>		
FTA Title VI C 4702.1B Chapter III-2, IV-12, Appendix F		
8. <b>COMMITTEE MEMBERSHIP:</b> <ul style="list-style-type: none"> <li>List all committees and councils.</li> <li>Describe the functions on the committee</li> <li>Include the manner that committee members are selected to the committee.</li> <li>If your Agency selects the committee members: <ul style="list-style-type: none"> <li>include a table of all committee and council members, broken down by race</li> <li>Include a description of the process used to encourage the participation of minorities on its committees</li> </ul> </li> <li>If your Agency does not select the committee members: <ul style="list-style-type: none"> <li>The Agency does not need to provide a table including race and the description of the participation process of minorities</li> </ul> </li> </ul>		
FTA Title VI C 4702.1B Chapter III-2-3, III-9, Appendix F		
9. <b>DEMOGRAPHIC MAPS:</b> Show the impacts of the State and Federal funds for public transportation projects. Include at least one of the following: <ul style="list-style-type: none"> <li>Maps that show the locations of the distributed funds during the previous year</li> <li>Maps that show the locations of the distributed funds for the current or upcoming year.</li> </ul>		
FTA Title VI C 4702.1B Chapter V-1-2, VI-1-2-3, Appendix I		
10. <b>DATA COLLECTION/REPORTING/ANALYSIS:</b> <p><b>Data Collection</b></p> <ul style="list-style-type: none"> <li>Describe how the agency collects Title VI data for any/all program areas in the Agency's FHWA/FTA Title VI program</li> <li>Detail what data is collected from each program area</li> </ul> <p><b>Data Analysis</b></p> <ul style="list-style-type: none"> <li>Describe how and when the data is analyzed <ul style="list-style-type: none"> <li>Title VI analysis involves pairing Demographics + Impact or Benefit</li> </ul> </li> </ul> <p><b>Note:</b> Include the demographic data collected on bidder awardees and analyze to determine trends of awardees based</p>		

<p>on race, color, or national origin. Describe the identified trends in the annual Goals and Accomplishments Report.  <b>23 CFR 200.9(b)(4)</b></p>			
<p><b>11. PUBLIC PARTICIPATION PLAN:</b></p> <ul style="list-style-type: none"> <li>• Link to your Agency's public participation plan</li> <li>• Include the sections from your Agency's Public Participation Plan that discuss outreach methods in additional languages, as needed</li> <li>• Summary of outreach efforts</li> </ul> <p><b><u>VIRTUAL PUBLIC INVOLVEMENT (VPI):</u></b></p> <ul style="list-style-type: none"> <li>• Describe how your Agency conducts Title VI compliance in virtual public participation</li> </ul> <p><b>FTA Title VI C 4702.1B Chapter III-2&amp;3</b></p>			
<p><b>12. TITLE VI COMPLAINT FORM AND PROCEDURES</b></p> <ul style="list-style-type: none"> <li>• Complaint must be filed within 180 days of the alleged discriminatory actions</li> <li>• Complaints should be in writing and signed; they may be filed by mail, fax, in person, or e-mail</li> <li>• Include the agency phone number for complainant to call agency to have the complaint allegations transcribed and then send a written complaint to complainant for a signature</li> <li>• Include the FHWA, FTA, Agency, and ECR contact information</li> <li>• A complaint form should contain at least the following information: <ul style="list-style-type: none"> <li>◦ A written explanation of what has happened</li> <li>◦ A way to contact the complainant</li> <li>◦ The basis of the complaint (e.g., race, color, national origin)</li> <li>◦ The identification of a specific person/people and the respondent (e.g., agency/organization) alleged to have discriminated</li> <li>◦ Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives FHWA funds, FTA financial assistance; a consultant, contractor or sub-recipient of Agency</li> <li>◦ The date(s) of the alleged discriminatory act(s) became known to the complainant or the last date of the incident</li> </ul> </li> </ul>			

<ul style="list-style-type: none"> <li>• Attach a sample log that will be used to log and track transit related Title VI investigations, complaints, and lawsuits over the past three years.</li> </ul> <p><b>FHWA COMPLAINT PROCEDURES:</b></p> <ul style="list-style-type: none"> <li>• Agency must forward all FHWA Title VI complaints to ECR within 72 hours of receipt</li> </ul> <p><b>FTA COMPLAINT PROCEDURES:</b></p> <ul style="list-style-type: none"> <li>• Agencies must establish and detail the procedures for investigating the complaint and tracking its status: <ul style="list-style-type: none"> <li>◦ The jurisdiction of a received complaint</li> <li>◦ If Agency will accept</li> <li>◦ If further information is needed from the complainant</li> </ul> </li> <li>• Once the determination has been for the Agency to accept the complaint for investigation, ECR should be notified within 72 hours.</li> <li>• Include a complaint form in any language that meets the Safe Harbor Threshold for the Agency</li> <li>• Agency will make a prompt investigation upon receipt of a complaint</li> </ul> <p><b>General Note:</b> FHWA retention for Title VI discrimination investigative case files and complaint logs is 4 (four) years.  <b>23 CFR 200.9(b)(3) and FTA Title VI C 4702.1B C III-4-5, Appendix C, D, E</b></p>			
<p>13. <b>TITLE VI TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Include the topics in the Title VI training, frequency of training to all pertinent Agency staff, and include who is responsible for facilitating the training</li> <li>• Include the Title VI training processes for new employees, if any</li> <li>• Describe how consultants are informed of the Agency's Title VI processes</li> </ul> <p><b>23 CFR 200.9(b)(9)</b></p>			
<p>14. <b>COMPLIANCE AND ENFORCEMENT PROCEDURES:</b></p> <ul style="list-style-type: none"> <li>• Describe how the Agency identifies the trends and patterns of discrimination.</li> <li>• Describe how the Agency will address deficiencies when noncompliance is determined.</li> </ul> <p><b>23 CFR 200.9(b)(14) &amp; (15)</b></p>			
<p>15. <b>PROGRAM AREA REVIEW PROCEDURES:</b></p> <ul style="list-style-type: none"> <li>• Describe each program area in the Agency's FHWA/FTA Title VI program</li> </ul>			

<ul style="list-style-type: none"> <li>• Describe how each program will be reviewed for effectiveness with Title VI.</li> <li>• Describe the steps/process in a transportation-related program review. <ul style="list-style-type: none"> <li>◦ Include the activities reviewed for the program</li> </ul> </li> <li>• Include any program reviews conducted for the TIP, PIP, or any other transportation plans.</li> <li>• Include when the program review will be conducted, how often, and by whom.</li> </ul> <p>23 CFR 200.9(b)(5),(6) &amp; (13) and 23 CFR 200.9(a)(4)</p>			
<p>16. <b><u>SUBRECIPIENT REVIEW:</u></b></p> <ul style="list-style-type: none"> <li>• List all FHWA and FTA subrecipients.</li> <li>• Include how often subrecipients are reviewed.</li> <li>• Describe the types of reviews and its purpose.</li> <li>• Describe the activities reviewed.</li> <li>• Describe how and when subrecipients will receive Title VI training from the Agency</li> </ul> <p>23 CFR 200.9(b)(7)</p>			