



Local Agency Federal Highway Administration (FHWA) Title VI Implementation Plan

City of Santa Rosa Transportation and Public Works Department
July 2026

Prepared by: Dan Hennessey, Director

II. TITLE VI ASSURANCES

A signed **DOT 1050.2A Title VI Assurance** form is included as **Appendix A**, which affirms compliance with Title VI of the Civil Rights Act of 1964 and related statutes and provides assurance to FHWA that all federally funded programs and activities comply with non-discrimination requirements.

III. ORGANIZATION, STAFFING, AND STRUCTURE

The Director of TPW is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

Within the City of Santa Rosa, the Director of TPW is designated to perform the duties of the Title VI Coordinator and ensure implementation of agency's Title VI program. The position of Director of TPW is located within 69 Stony Circle and reports directly to the City Manager.

The Title VI Coordinator is responsible for:

- Overseeing Title VI program implementation
- Submitting a Title VI plan and annual reports on the agency's behalf
- Developing procedures for the prompt processing and disposition of complaints
- Processing complaints, compiling a complaint log, and reporting to Caltrans
- Developing procedures for the collection and analysis of statistical data
- Developing a program to conduct Title VI reviews of program areas
- Conducting annual Title VI assessments of pertinent program areas
- Developing Title VI information for dissemination
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary

The current TPW Director is Dan Hennessey. His contact information is dhennessey@srcity.org, (707) 543-3807. TPW oversees the City's Transit, Fleet Maintenance, Streets Maintenance, Parks Maintenance, Facilities Maintenance, Electrical Maintenance, Transportation Safety, Capital Projects Engineering, and Real Estate Services Divisions. The Divisions of the TPW Department that are subject to the provisions of this document are the Transportation Safety and Capital Projects Engineering Divisions. It should be noted that the City of Santa Rosa's Transit Division has a separate Title VI Implementation per Federal Transit Administration (FTA) requirements.

IV. TITLE VI NOTICE TO THE PUBLIC

The City of Santa Rosa ensures that information regarding Title VI protections is readily available to the public. The City disseminates its Title VI Notice to the Public through the following methods:

- Posting on the City of Santa Rosa's official website under the Transportation and Public Works Department page;
- Inclusion in public meeting materials and project outreach materials for federally funded transportation projects;
- Posting in public offices of the Transportation and Public Works Department;
- Distribution upon request in print or electronic format;
- Inclusion in Requests for Proposals (RFPs), contracts, and consultant agreements as applicable.

The Title VI Notice is available in English, Spanish, and Vietnamese. Translations into other languages and alternate formats (including large print and accessible electronic formats) are provided upon request at no cost to the public. The Public Notice is attached as **Appendix B**.

V. TITLE VI TRAINING

The City of Santa Rosa (City) is committed to ensuring that all employees participating in programs and projects that may receive funding from the Federal Highway Administration understand their responsibilities under Title VI of the Civil Rights Act of 1964 and related nondiscrimination statutes and regulations, including Executive Order 13166 on Limited English Proficiency (LEP).

A. Training Requirements

The City will provide Title VI training to all TPW employees whose duties involve:

- Administration of federally funded transportation programs;
- Public outreach and community engagement;
- Project planning, design, and delivery, including contract oversight;
- Complaint intake and investigation.

New employees will receive Title VI training as part of onboarding or within a reasonable period after hire. Refresher training will be provided periodically, and at minimum when significant regulatory updates occur or when directed by Caltrans.

B. Training Content

Training will include, at a minimum:

- Overview of Title VI of the Civil Rights Act of 1964;
- Overview of related nondiscrimination authorities (including protections based on sex, age, and disability);
- Responsibilities under 23 CFR Part 200 and 49 CFR Part 21;
- Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency;
- The City's Title VI Policy and Complaint Procedures;
- Public participation and equitable outreach practices;
- Environmental Justice principles;
- Prohibition of retaliation and harassment;
- Documentation and reporting requirements.

C. Delivery Methods

Training may be delivered through in-person presentation by senior TPW staff familiar with Title VI requirements.

D. Documentation

The City will maintain records of all Title VI trainings conducted, including:

- Training materials and agendas;
- Attendance logs;
- Dates of training sessions.

Training documentation will be retained in accordance with applicable record retention requirements and made available to Caltrans upon request.

The Title VI Coordinator is responsible for ensuring that required training is conducted and properly documented.

VI. TITLE VI COMPLAINT PROCEDURES

A. Dissemination of Complaint Procedures

The City of Santa Rosa (City) makes its Title VI Complaint Procedures available to the public through the following methods:

- Posting on the City's official website under the Transportation and Public Works Department page;
- Availability at TPW public service counters;
- Inclusion in federally funded transportation project outreach materials upon request;
- Provision in printed or electronic format upon request.

Complaint procedures and forms are available in English, Spanish, and Vietnamese. Translations into additional languages and alternate formats (including large print and accessible electronic formats) are provided upon request at no cost. Assistance for individuals with Limited English Proficiency (LEP) is available.

B. City of Santa Rosa Title VI Complaint Policy Statement

The City of Santa Rosa, in accordance with Title VI of the Civil Rights Act of 1964, ensures that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance. Related federal statutes and authorities prohibit discrimination based on sex, age, and disability.

This prohibition applies to all programs and activities of the City, including its departments, contractors, consultants, and subrecipients.

The City will make every effort to ensure nondiscrimination in all services, programs, and activities, whether federally funded or not, and that services and benefits are fairly distributed to all persons.

C. How to File a Complaint

Any person who believes they have been discriminated against based on race, color, or national origin by the City of Santa Rosa or a subrecipient may file a Title VI complaint.

Complaints may be filed using the City's Title VI Complaint Form and submitted by mail, e-mail, in-person delivery, or online submission (if applicable).

Complaints must be filed within 180 days of the alleged discriminatory act.

The complaint should include:

- The complainant's name, address, and contact information;
- A description of the alleged discrimination (including date, location, and individuals involved);
- The basis of the complaint (race, color, national origin, etc.);
- The complainant's signature.

The City will only process complaints that are complete and signed.

D. Acknowledgment and Timeline

- The City will acknowledge receipt of a complaint within 10 business days.
- Within 15 business days, the Title VI Coordinator will conduct a preliminary review to determine jurisdiction.
- If the complaint falls under Title VI and involves a federally funded program, the complaint will be forwarded to Caltrans within one business day of receipt, consistent with FHWA guidance.
- The investigation and resolution process generally will be completed within 60 calendar days, unless circumstances require additional time.

If additional time is needed, the complainant will be notified in writing.

E. Investigation Process

If the City is authorized to investigate the complaint, the investigation may include:

- Review of relevant documents and records;
- Interviews with the complainant;
- Interviews with City staff or other involved parties;
- Review of applicable policies and procedures.

The Title VI Coordinator will ensure that the investigation is conducted in a fair, objective, and impartial manner.

F. Decision and Corrective Action

At the conclusion of the investigation, the City will issue a written determination to the complainant that includes:

- A summary of the allegations;
- A description of the investigation conducted;
- Findings of fact;

- A determination of compliance or noncompliance;
- Any corrective actions to be taken, if applicable.

If discrimination is found, the City will take appropriate corrective action to remedy the violation and prevent recurrence.

G. Appeal Process

If the complainant disagrees with the City's determination, they may submit a written appeal within 30 days of receipt of the determination. The appeal must include the basis for disagreement.

The appeal will be reviewed by an appropriate City official not directly involved in the original investigation. A final written decision will be issued to the complainant.

H. Filing Directly with State or Federal Agencies

A complainant may also file a Title VI complaint directly with:

California Department of Transportation (Caltrans)
Division of Civil Rights – Title VI Branch
P.O. Box 942874, MS 79
Sacramento, CA 94274

Or:

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE 8th Floor E81-105
Washington, DC 20590

Filing a complaint with the City of Santa Rosa does not preclude the complainant from filing with Caltrans or the Federal Highway Administration.

Per the Federal Highway Administration (FHWA) Guidance Memorandum, Processing of Title VI Complaints, dated June 13, 2018, all Title VI complaints received by a sub-recipient are to be forwarded to Caltrans to be submitted to the FHWA Division Office. Complaints will be sent within one business day of receipt via email to Title.VI@dot.ca.gov. If the Headquarters Office of Civil Rights (HCR) determines a Title VI complaint against a sub-recipient can be investigated by Caltrans, HCR may delegate the task of investigating the complaint to Caltrans.

VII. TITLE VI COMPLAINT LOG

The City of Santa Rosa (City) maintains a Title VI Complaint Log to document, track, and monitor all Title VI complaints received. The log ensures accountability, transparency, and compliance with federal nondiscrimination requirements.

The Title VI Coordinator is responsible for maintaining and updating the Complaint Log.

A. Log Contents

For each complaint received, the log includes the following information:

- Date the complaint was received;
- Complainant's name and contact information (if provided);
- Complainant's demographic information (race, color, national origin, sex, age, disability status), if voluntarily provided;
- Description and summary of the alleged discriminatory act;
- Basis of the complaint (race, color, national origin, etc.);
- Location and program/activity involved;
- Investigation status (e.g., pending, under review, referred to Caltrans, closed);
- Date of acknowledgment;
- Date forwarded to Caltrans (if applicable);
- Summary of findings;
- Resolution and/or corrective actions taken;
- Date of final determination.

B. Confidentiality

The City will maintain the confidentiality of complainants to the extent permitted by law. Personally identifiable information will be protected and disclosed only as necessary to conduct a proper investigation or as required by law.

C. Retention

Complaint records and logs will be retained in accordance with applicable federal and state record retention requirements. Records will be made available to Caltrans upon request for monitoring or compliance review purposes.

D. Reporting

The Title VI Coordinator will review the Complaint Log periodically to:

- Identify patterns or trends;
- Determine whether corrective actions are effective;
- Inform training and policy improvements.

If no Title VI complaints are received during the reporting period, the Complaint Log will reflect “No complaints received.”

VIII. PUBLIC PARTICIPATION PLAN

TPW is committed to proactive, inclusive, and meaningful public engagement in the planning and delivery of transportation programs and projects. The City ensures that all persons, including minority, low-income, and Limited English Proficient (LEP) populations, have the opportunity to participate in decision-making processes that affect them.

Public participation efforts are conducted in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

A. Public Outreach Strategies

The City utilizes a variety of engagement strategies to ensure broad and inclusive participation, including:

- Public meetings and community workshops (in-person and virtual);
- Open houses and pop-up outreach events;
- Surveys (online and paper format);
- Focus groups and stakeholder meetings;
- Presentations to neighborhood associations and community-based organizations;
- Coordination with schools, advocacy groups, and local partners;
- Project-specific email lists and notification systems.

Meetings are held at ADA-accessible facilities and scheduled at varying times (including evenings when feasible) to maximize participation.

B. Identification of Minority and Underserved Populations

The City identifies minority and low-income populations through:

- Review of U.S. Census Bureau and American Community Survey demographic data;
- Geographic Information System (GIS) mapping of demographic concentrations;
- Review of school district language data;
- Input from community-based organizations and neighborhood groups;
- Consultation with local service providers and advocacy organizations.

Demographic analysis is conducted during the early stages of federally funded transportation planning and project development to ensure outreach efforts are directed toward communities most likely to be affected.

C. Communication with Minority Populations

The City communicates with minority and underserved communities through:

- Direct outreach to neighborhood associations in affected areas;
- Partnerships with trusted community-based organizations;
- Distribution of printed flyers in community centers, libraries, and local businesses;
- Email newsletters and project updates;
- Social media platforms;
- Posting notices on the City's website;
- Targeted mailings to impacted neighborhoods.

When appropriate, the City conducts outreach in locations that are convenient and familiar to affected communities.

D. Limited English Proficiency (LEP) Outreach

The City provides meaningful access to individuals with Limited English Proficiency consistent with Executive Order 13166.

LEP outreach measures include:

- Translation of vital documents, including notices, surveys, and complaint forms, into Spanish and other languages as needed;
- Bilingual staff or contracted interpreters at public meetings upon request;
- Language identification ("I Speak") cards available at public counters;
- Telephonic interpretation services when necessary;

- Notice in outreach materials that language assistance is available at no cost.

The City monitors demographic data to determine when additional languages should be incorporated into outreach efforts.

E. Notification Methods

Public notices and outreach materials are disseminated using multiple communication channels, including:

- Posting on the City's official website;
- Social media platforms;
- Email distribution lists;
- Local newspaper publications when appropriate;
- Direct mail to affected property owners or residents;
- Physical postings at City Hall and public facilities.

All federally funded transportation projects include public notification components consistent with Title VI requirements.

F. Inclusion Measures and Targeted Outreach

To ensure inclusive participation, the City:

- Identifies potentially affected minority and low-income communities early in the planning process;
- Conducts targeted outreach in those communities;
- Provides accessible meeting formats (virtual, hybrid, in-person);
- Ensures ADA accessibility at meeting locations;
- Offers translation and interpretation services;
- Provides multiple methods for submitting comments (online, email, mail, in-person).

G. Consideration of Public Input in Decision-Making

Public input is formally documented and incorporated into project planning and decision-making processes.

The City:

- Collects and tracks comments received through meetings, surveys, and written submissions;

- Evaluates input for themes, concerns, and potential disproportionate impacts;
- Addresses community concerns in staff reports and project documentation;
- Modifies project designs where feasible to address identified issues;
- Provides follow-up communication summarizing how input was considered.

For federally funded projects, documentation of outreach activities and public comments is maintained as part of the project record and made available for compliance review.

H. Continuous Improvement

The Title VI Coordinator periodically reviews outreach practices to:

- Evaluate effectiveness in reaching minority and LEP populations;
- Identify participation gaps;
- Improve communication strategies for future projects.

IX. LIMITED ENGLISH PROFICIENCY (LEP) ASSESSMENT / LANGUAGE ASSESS PLAN (LAP)

The City of Santa Rosa (City) is committed to providing meaningful access to its federally funded programs, services, and activities for individuals with Limited English Proficiency (LEP), consistent with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

The City recognizes that failure to provide language access may constitute national origin discrimination under Title VI.

To ensure meaningful access, the City conducts a Limited English Proficiency (LEP) Needs Assessment using the Four-Factor Analysis framework and implements reasonable steps to address identified needs.

A. Four-Factor Analysis

1. The Number or Proportion of LEP Persons Served

The City evaluates demographic data from:

- U.S. Census Bureau and American Community Survey (ACS) data;
- Local school district language data;
- Community organization input;

- Project-specific outreach results.

Based on recent demographic data, Spanish is the most commonly spoken language other than English in Santa Rosa. The City monitors whether other language groups exceed the U.S. Department of Justice “safe harbor” threshold (5% or 1,000 persons, whichever is less) for translation of vital documents. Currently, Vietnamese also meets the safe harbor threshold.

Demographic data is periodically reviewed to ensure responsiveness to changing community needs.

2. Frequency of Contact with LEP Persons

The City assesses how frequently LEP individuals interact with:

- Transportation planning processes;
- Public meetings and workshops;
- Permitting and right-of-way processes;
- Construction project outreach;
- Public counters and customer service interactions.

Given the City’s diverse population and the public-facing nature of transportation and infrastructure projects, contact with LEP individuals occurs on a regular basis, particularly with Spanish-speaking residents.

3. Importance of the Program, Service, or Activity

Transportation infrastructure projects, roadway improvements, safety projects, and pedestrian facilities significantly impact residents’ mobility, safety, and quality of life.

Because these services are critical to daily living, employment access, and public safety, the City recognizes a high importance level for ensuring meaningful language access.

4. Resources Available and Cost Considerations

The City considers:

- Availability of bilingual staff;
- Use of contracted interpretation services;
- Translation service providers;
- Budget constraints;
- Availability of electronic translation tools.

The City takes reasonable steps to balance meaningful access with available resources, prioritizing translation of vital documents and interpretation for public meetings related to federally funded projects.

B. Language Access Services

To provide meaningful access, the City implements the following measures:

1. Translation of Vital Documents

Vital documents may include:

- Title VI Notice to the Public;
- Complaint forms and procedures;
- Public meeting notices;
- Surveys related to federally funded projects;
- Project fact sheets when appropriate.

Spanish translations are routinely provided. Additional languages are translated as needed based on demographic analysis and community requests.

2. Interpretation Services

The City provides:

- Bilingual staff support when available;
- Contracted in-person interpreters for public meetings upon request;
- Telephonic interpretation services;
- Notice in outreach materials that language assistance is available at no cost.

Requests for interpretation are accommodated when feasible and when advance notice is provided.

3. Staff Training

City employees receive Title VI and language access training that includes:

- Identification of LEP individuals;
- Procedures for accessing interpretation services;
- Proper handling of translated materials;
- Documentation of language assistance efforts.

The Title VI Coordinator ensures that relevant staff are aware of language access responsibilities.

C. Outreach Strategies for LEP Communities

The City enhances outreach to LEP populations through:

- Distribution of translated outreach materials in affected neighborhoods;
- Collaboration with community-based organizations serving LEP populations;
- Posting notices in locations frequented by LEP communities;
- Use of culturally appropriate messaging;
- Offering multilingual surveys when appropriate.

Outreach efforts are documented as part of project records for federally funded projects.

D. Monitoring and Updating the LAP

The City will:

- Periodically review demographic data;
- Monitor requests for language assistance;
- Track complaints or concerns related to language access;
- Update the LEP Assessment as needed to reflect demographic or operational changes.

The Title VI Coordinator is responsible for overseeing implementation and updates to this Language Access Plan.

E. Commitment to Meaningful Access

The City of Santa Rosa will take reasonable steps to ensure that LEP individuals have meaningful access to federally funded transportation programs and services without imposing undue financial or administrative burdens on City operations.

X. TITLE VI DATA COLLECTION

TPW collects and analyzes demographic data to ensure compliance with Title VI of the Civil Rights Act of 1964 and to prevent discrimination in its federally funded programs and activities.

The City uses data collection to evaluate whether minority and other protected populations are equitably served and whether any disproportionately high and adverse effects may result from transportation planning, construction, or right-of-way activities.

A. Sources of Demographic Data

The City utilizes the following sources of data:

- U.S. Census Bureau data;
- American Community Survey (ACS) estimates;
- Geographic Information System (GIS) mapping tools;
- Local school district language data (when relevant);
- Public meeting sign-in sheets and voluntary surveys;
- Right-of-way and relocation program records (if applicable).

These data sources help identify minority, low-income, Limited English Proficient (LEP), and other potentially underserved populations.

B. Data Collection During Public Participation

When conducting public meetings, workshops, surveys, or outreach activities related to federally funded projects, the City may collect demographic information through voluntary self-identification.

Demographic data collected may include:

- Race;
- Ethnicity;
- National origin (if voluntarily provided);
- Sex;
- Language spoken at home.

Participation in demographic surveys is voluntary, and individuals are informed that the information is collected solely for compliance and equity evaluation purposes.

The City does not deny services or benefits to individuals who decline to provide demographic information.

C. Right-of-Way and Relocation Data

When federally funded projects involve property acquisition or relocation, the City collects demographic information (when voluntarily provided) regarding affected residents or businesses. This data is used to:

- Ensure nondiscriminatory treatment;
- Monitor relocation assistance delivery;

- Identify any disproportionate impacts to minority or protected populations;
- Document compliance with federal requirements.

All demographic information collected during right-of-way processes is handled confidentially and maintained in accordance with applicable privacy laws.

D. Data Analysis and Use

The City analyzes demographic data to:

- Identify minority and underserved populations within project areas;
- Assess whether outreach efforts are effectively reaching affected communities;
- Evaluate whether transportation improvements are equitably distributed;
- Determine whether any project may result in disproportionately high and adverse effects;
- Inform mitigation strategies when necessary.

GIS mapping is used, when appropriate, to overlay project boundaries with demographic data to identify impacted populations.

E. Confidentiality and Privacy

All demographic information collected by the City is:

- Voluntary when obtained from individuals;
- Used solely for Title VI compliance and equity analysis;
- Protected from unauthorized disclosure;
- Maintained in accordance with federal and state record retention requirements.

Personally identifiable information is not publicly disclosed.

F. Monitoring and Reporting

The Title VI Coordinator is responsible for:

- Reviewing demographic data collected during outreach and project implementation;
- Monitoring patterns that may indicate potential disparities;
- Ensuring documentation is maintained for compliance review;
- Providing documentation to Caltrans upon request.

If no demographic data is collected during a reporting period (e.g., no federally funded projects involving relocation), the City will document that no applicable data was generated.

XI. PRIMARY PROGRAM AREA DESCRIPTIONS & INTERNAL TITLE VI REVIEW PROCEDURES

The City of Santa Rosa Transportation and Public Works (TPW) Department administers federally funded transportation programs and projects. The Department is responsible for ensuring compliance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities across all program areas.

To ensure nondiscrimination, TPW has established internal review procedures to evaluate program implementation, outreach, decision-making, and service delivery, as shown in Table 1 on the following page.

To ensure ongoing compliance, the TPW Department has established an Internal Title VI Review Program.

A. Purpose

The purpose of internal reviews is to:

- Evaluate compliance with Title VI requirements;
- Identify potential disparities or risks;
- Improve outreach and service delivery practices;
- Ensure documentation is complete and audit-ready.

B. Frequency

Internal Title VI reviews will be conducted:

- At least once every three (3) years; or
- More frequently if required by Caltrans; or
- When significant programmatic changes occur.

Project-specific reviews may also occur during major federally funded projects.

Table 1: TPW Program Areas and Title VI Review Procedures

Program Area	General Description	Title VI / Non-Discrimination Concerns & Responsibilities	Review Procedure for Ensuring Non-Discrimination
Planning	Development of transportation plans, corridor studies, capital improvement programming, and policy documents.	Ensure equitable project selection; avoid disproportionate adverse impacts; inclusive public outreach; LEP accommodations.	Review demographic data and GIS mapping for impacted areas; document outreach to minority and LEP communities; confirm public comments are tracked and addressed; periodic internal audit by Title VI Coordinator.
Right of Way	Property acquisition, easements, relocation assistance for federally funded projects.	Risk of disproportionate impacts to minority or low-income populations; fair relocation assistance; nondiscriminatory negotiations.	Review demographic data of affected parties (voluntary); verify compliance with Uniform Relocation requirements; confirm consistent compensation procedures; maintain documentation of communications and determinations.
Environmental	Environmental review under CEQA/NEPA; impact analysis and mitigation.	Identification of disproportionately high and adverse effects; Environmental Justice considerations; meaningful public participation.	Evaluate demographic overlays during environmental review; confirm inclusion of equity analysis; verify public outreach efforts; ensure mitigation measures are documented when impacts are identified.
Design & Engineering	Design of roadway, pedestrian, bicycle, and traffic safety improvements.	Equitable distribution of infrastructure improvements; ADA accessibility compliance; safety improvements in underserved areas.	Periodic review of project distribution across geographic areas; confirm ADA standards incorporated; review prioritization criteria for equity considerations.
Construction & Project Delivery	Construction management and oversight of federally funded projects.	Nondiscriminatory contractor practices; accessibility during construction; public notification.	Include nondiscrimination clauses in contracts; monitor complaints during construction; confirm temporary access and detours consider mobility needs; document outreach efforts.
Public Outreach & Communications	Public notices, meetings, surveys, and stakeholder engagement.	Meaningful access for minority and LEP populations; nondiscriminatory communication practices.	Confirm translation of vital documents; verify availability of interpretation services; review demographic participation data; adjust outreach strategies as needed.

C. Review Components

The Title VI Coordinator will review:

- Public outreach documentation;
- Demographic data analysis for affected areas;
- Complaint records and resolution documentation;
- Right-of-way and relocation files (if applicable);
- Contract language for nondiscrimination assurances;
- LEP accommodation measures;
- ADA accessibility considerations.

D. Documentation

Each internal review will include:

- A checklist or evaluation form;
- Summary of findings;
- Identification of any corrective actions;
- Timeline for implementing corrective measures.

Review documentation will be retained and made available to Caltrans upon request.

E. Corrective Action

If a review identifies deficiencies or potential disparities:

- The TPW Department will develop a corrective action plan;
- Assign responsible staff;
- Establish a timeline for implementation;
- Monitor completion.

The Title VI Coordinator will track corrective actions to ensure timely resolution.

XII. EXTERNAL TITLE VI REVIEWS / SUBRECIPIENT MONITORING

The City may distribute federal-aid funds to subrecipients (e.g., consultants, non-profit partners, or other local agencies) for certain transportation-related programs and projects. The City is responsible for ensuring that all subrecipients

comply with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities in their federally funded programs and activities.

The City's subrecipient monitoring program is designed to ensure compliance through documentation review, periodic monitoring, technical assistance, and corrective action when necessary.

A. Subrecipient Identification and Risk Assessment

The City will maintain a list of all subrecipients receiving federal-aid funds through the City.

For each subrecipient, the City will assess risk based on:

- Size and complexity of the program or project;
- Type of federal funding received;
- History of compliance or complaints;
- Population served and potential for disproportionate impacts;
- Number of contracts or subawards.

Higher-risk subrecipients will be monitored more frequently and more intensively.

B. Annual Title VI Plan Review

The City will require each subrecipient to submit a current Title VI Plan, which includes:

- A Title VI policy statement;
- Complaint procedures and complaint log;
- Public participation plan;
- LEP plan (if applicable);
- Data collection procedures;
- Internal review procedures;

The City will review each subrecipient's Title VI Plan annually to ensure the plan is current and complete, reflects the subrecipient's current operations, and meets Title VI requirements and Caltrans expectations.

C. Desk Audits and On-Site Reviews

1. Desk Audits

The City will conduct desk audits at least annually for each subrecipient, which may include review of:

- Title VI policy statement and plan;
- Complaint log and resolution documentation;
- Public outreach documentation for federally funded projects;
- LEP materials and translation/interpretation documentation;
- Data collection and analysis records;
- Contracts and procurement documentation for nondiscrimination clauses.

2. On-Site Reviews

The City may conduct on-site reviews for subrecipients when:

- The subrecipient is identified as high-risk;
- Complaints indicate potential noncompliance;
- A desk audit indicates significant deficiencies;
- Required by Caltrans or federal guidance.

On-site reviews may include interviews with staff, review of facilities, and verification of outreach and complaint procedures.

D. Technical Assistance

The City will provide technical assistance to subrecipients to support compliance, including:

- Guidance on Title VI requirements and best practices;
- Assistance with updating Title VI Plans;
- Training on complaint procedures, LEP access, and public participation;
- Assistance with data collection and reporting.

Technical assistance will be provided upon request and when monitoring identifies gaps.

E. Findings, Corrective Actions, and Follow-Up

If a subrecipient is found to have deficiencies or noncompliance, the City will:

- Issue a written notice of findings describing the deficiency;
- Require a corrective action plan (CAP) with a timeline for completion;
- Provide technical assistance as needed;
- Monitor implementation of the CAP;
- Close the monitoring case once corrective actions are verified.

If a subrecipient fails to comply or implement corrective actions, the City may take additional actions, including:

- Suspension of federal funding pass-through;
- Termination of the subaward;
- Referral to Caltrans or federal agencies for further action.

F. Documentation and Recordkeeping

The City will maintain records of all subrecipient monitoring activities, including:

- Annual plan reviews;
- Desk audit reports;
- On-site review reports;
- Corrective action plans and documentation of completion;
- Technical assistance provided.

Records will be retained in accordance with applicable record retention requirements and made available to Caltrans upon request.

XIII. TITLE VI ANNUAL WORK PLAN (TITLE VI ACCOMPLISHMENTS AND GOALS REPORT)

The City will develop and maintain an annual Title VI report that documents accomplishments, identifies areas for improvement, and outlines goals and planned activities for the upcoming fiscal year. The report will serve as a tool to ensure continuous Title VI compliance and to demonstrate ongoing progress in nondiscrimination efforts.

The Title VI Annual Report will be developed by the Title VI Coordinator and submitted to Caltrans as required. The report will be retained in accordance with applicable record retention requirements and made available upon request.

A. Title VI Annual Accomplishments Report

The City will document the following items for the reporting period:

- Title VI training conducted, including dates, topics, and number of staff trained
- Title VI complaints received, including summaries, findings, and resolutions
- Public outreach activities, including projects and events where Title VI outreach was conducted for federally-funded programs and projects
- LEP accommodations provided, including translation and interpretation services
- Internal Title VI reviews completed, including findings and corrective actions
- Subrecipient monitoring activities, if applicable
- Updates to Title VI policies and procedures, if any
- Data collection and analysis activities, including demographic mapping or surveys
- Other accomplishments related to equity, accessibility, and nondiscrimination

The Annual Accomplishments Report will include documentation of major Title VI milestones and examples of completed activities, such as meeting summaries, outreach materials, training sign-in sheets, and complaint log excerpts (with personal information redacted).

B. Title VI Goals and Planned Activities

The Annual Report will identify goals and planned Title VI activities for the upcoming fiscal year, including but not limited to:

- Updating the Title VI Program and supporting plans to reflect organizational or regulatory changes
- Expanding outreach to minority and LEP communities
- Enhancing training programs for staff and contractors
- Conducting internal Title VI reviews of program areas
- Completing subrecipient monitoring and external reviews (if applicable)
- Improving data collection and analysis procedures
- Increasing accessibility of public participation and complaint processes
- Incorporating environmental justice and equity considerations into project planning

C. Title VI Work Plan for the Upcoming Fiscal Year

The City will develop a Title VI Work Plan that outlines monitoring and review activities planned for the upcoming fiscal year. The Work Plan will include:

- Scheduled internal reviews (program areas and/or projects)
- Scheduled subrecipient monitoring activities (if applicable)
- Planned training sessions and refresher trainings
- Planned updates to policies and procedures
- Planned outreach activities for federally funded projects
- Planned updates to LEP and Public Participation plans
- Any additional Title VI compliance activities

The Work Plan will specify the responsible staff or departments and expected completion dates for each activity.

D. Reporting and Accountability

The Title VI Coordinator is responsible for:

- Preparing the annual report and work plan
- Coordinating data collection and documentation
- Ensuring review and approval by appropriate City leadership
- Submitting the report to Caltrans as required
- Monitoring progress on planned activities and updating the work plan as needed

E. Availability of the Annual Report

The City will make the annual Title VI accomplishments and goals report available to the public upon request. The report will be provided in alternate formats and languages as needed.

APPENDIX A – 1050.2A TITLE VI ASSURANCE FORM

APPENDIX B – TITLE VI PUBLIC NOTICE

The Public Notice is as follows:

Your Rights Under Title VI of the Civil Rights Act of 1964

The City of Santa Rosa operates its programs and services without regard to race, color, national origin, sex, age, or disability, in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities.

Any person who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City of Santa Rosa program or activity based on race, color, national origin, sex, age, or disability may file a discrimination complaint.

A complaint may be filed with the City of Santa Rosa or directly with the California Department of Transportation (Caltrans).

How to File a Complaint

To file a Title VI discrimination complaint with the City of Santa Rosa, contact:

Title VI Coordinator
Dan Hennessey, City Engineer
Transportation and Public Works Department
City of Santa Rosa
69 Stony Circle
Santa Rosa, CA 95401
Phone: (707) 543-3807
Email: dhennessey@srcity.org

Complaints must be filed within 180 days of the alleged discriminatory act. Complaint forms are available on the City's website and at City Hall upon request.

A complaint may also be filed directly with:

California Department of Transportation (Caltrans)
Division of Civil Rights
1823 14th Street
Sacramento, CA 95811