

California Department of Transportation

DIVISION OF LOCAL ASSISTANCE
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December 9, 2025

Dan Hennessey
Transportation and Public Works Director
City of Santa Rosa
69 Stony Circle
Santa Rosa, CA 95401

THIS CORRESPONDENCE IS SENT ELECTRONICALLY AND VIA U.S. MAIL

Dear Dan Hennessey:

The California Department of Transportation (Caltrans), Division of Local Assistance (DLA), Office of Local Civil Compliance (LCC) finalized the Federal Highway Administration (FHWA) Title VI program assessment of the City of Santa Rosa (City) conducted in December 2025. The LCC has reviewed the Title VI Program Assessment Online Form responses provided by your agency and has deemed the City **non-compliant with findings/recommendations** with the FHWA Title VI program requirements. Please see the attached report for findings/recommendations. The DLA team will reach out to schedule a follow-up meeting to discuss the findings in more detail and explore how we can work together to strengthen the City's Title VI program.

With this letter, Caltrans is closing out this program assessment. Caltrans will verify the corrective items (1 through 11) in the next program assessment scheduled for **December 2026**. Please note that although there may be recommendations in the report, all findings listed under the "Findings" section above must be corrected to comply with FHWA Title VI requirements.

Once all findings are corrected, please complete the [Title VI Program Assessment Online Form](#) by **November 30, 2026**, to provide Caltrans with the corrected items and to ensure Caltrans has the latest submittal to perform a Title VI Program Assessment.

Note: In Federal Fiscal Year 2026, Caltrans is expected to be audited by FHWA for Title VI compliance, including Caltrans' oversight responsibilities of Local Public Agencies (LPAs) and LPAs' Title VI compliance. LPAs failing to correct the corrective items may result in a breach of the *Master Agreement – Administering Agency-State Agreement for Federal-Aid Projects* with Caltrans or be deemed non-compliant with

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the FHWA Title VI program requirements, where current and future funds may be jeopardized.

Please note that there have been changes to the FHWA Title VI requirements recently. Visit the [FHWA Title VI Local Agency Requirements](#) webpage to learn about FHWA's requirements.

We want to thank you for contributing to this program assessment and allowing Caltrans to conduct a successful assessment. Please visit the [LCC Title VI](#) webpage for Title VI resources. If there are any questions or concerns, please contact Loi Tran, Local Title VI Coordinator, at (916) 628-7499 or dla.titlevi@dof.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Catubig".

Aaron Catubig
Chief, Data & Oversight Branch



**Caltrans Division of Local Assistance
Federal Highway Administration (FHWA)
Title VI Program Assessment Report**

Local Public Agency (LPA): 5028 - Santa Rosa

Date of Submission: 03/19/25

Overall Compliance Status: Non - Compliant with findings/recommendations

Assessed By:	<i>Loi Tran</i>	Loi Tran	Local Title VI Coordinator	12/9/25
	Signature	Name	Title	Date
Approved By:	<i>Aaron Catubig</i>	Aaron Catubig	Chief, Data & Oversight	12/9/2025
	Signature	Name	Title	Date

Compliant (Y/N)

N

1. **Title VI Implementation Plan (Title VI Plan)** (28 CFR 42.415 and 23 CFR 200.9(b)(11))
 - a. LPA has a Title VI Plan
 - b. Title VI Plan is no more than three years old
 - c. Title VI Plan covers race, color, and national origin under Title VI of the Civil Rights Act of 1964
 - d. Title VI Plan includes all the items listed on this checklist
 - e. Title VI Plan posted on the LPA's website

N

2. **Title VI Coordinator** (23 CFR 200.9(b)(1))
 - a. LPA has a Title VI Coordinator
 - b. Title VI Coordinator has access to the head of the agency
 - c. Contact information made available to the public (i.e., public website, post in publicly accessible areas)

Revised 03/25/25



N

3. **Title VI/Non-Discrimination Policy Statement** (49 CFR 21.7(b))
- a. LPA has a Title VI/Non-Discrimination Policy Statement
 - b. Policy Statement covers race, color, and national origin under Title VI of the Civil Rights Act of 1964
 - c. Policy Statement signed by the head of the agency
 - d. Policy Statement made available to the public (i.e., public website, post in publicly accessible areas)

N

4. **Limited English Proficiency (LEP) Assessment (Four Factor Analysis)/ Language Access Plan (LAP)** (Executive Order 13166)
- a. LPA performed an LEP Assessment
 - b. LEP Assessment performed annually
 - c. LEP Assessment addressed the four factors identified in the [U.S. Department of Transportation LEP Guidance](#)
 - d. LPA developed an LAP and updated with the results of the LEP Assessment as needed
 - e. LAP made available to the public (i.e., public website, post in public accessible areas)
 - f. LPA has procedures for processing interpretation (verbal) or translation (written) requests
 - g. LPA created and maintained an LEP Log to track interpretation and translation requests received and services provided

N

5. **Dissemination of Title VI Information** (23 CFR 200.9(b)(12))
- a. LPA developed Title VI information for dissemination to the general public and, where appropriate, in languages other than English (determined by the LEP Assessment)
 - b. Title VI information made available to the public (i.e., public website, post in public accessible areas)

N

6. **Title VI Training for LPA Staff** (23 CFR 200.9(b)(9))
- a. LPA provided Title VI training for all LPA employees
 - b. LPA employees receive Title VI training every two years
 - c. Title VI training must cover what is Title VI, how the LPA implements its Title VI program to meet federal requirements, and what steps to take for handling Title VI complaints, as well as language interpretation (verbal)/translation (written) requests

Revised 03/25/25



N

7. Title VI Assurances in Contract Documents and Agreements (23 CFR 200.9(a)(1) and 49 CFR 21.7)

- a. LPA signed the Title VI assurances as part of [Exhibit 4-C, "MASTER AGREEMENT - ADMINISTERING AGENCY-STATE AGREEMENT FOR FEDERAL-AID PROJECTS"](#)
- b. LPA included required Title VI assurances (specifically, Appendices A and E of the Title VI Assurances) in all sub-contracts and sub-agreements with federal funds, where applicable.

N

8. Title VI Complaint Procedures (23 CFR 200.9(b)(3))

- a. LPA developed Title VI complaint form
- b. LPA developed Title VI complaint log
- c. LPA developed procedures for prompt processing and disposition of Title VI complaints received directly by the LPA
- d. LPA has Title VI complaint procedures including logging Title VI complaints received and determining jurisdiction, as well as for completeness
- e. LPA has Title VI complaint procedures including forwarding Title VI complaints to Caltrans for processing

N

9. Title VI Data Collection (23 CFR 200.9(b)(4))

- a. LPA developed procedures for the collection of statistical data (race, color, and national origin) of participants in, and beneficiaries of, federally funded roadway projects
- b. LPA developed procedures for analyzing the data collected to determine the effectiveness of outreach methods, and to ensure that no group is excluded during the decision-making process or is not given an opportunity to voice their opinions or concerns

N

10. Internal/External Title VI Reviews (23 CFR 200.9(a)(4), 23 CFR 200.9(b)(5), 23 CFR 200.9(b)(6), and 23 CFR 200.9(b)(7))

- a. LPA developed a program to conduct internal Title VI reviews of program areas
- b. LPA developed a program to conduct external Title VI reviews of sub-awardees

N

11. Title VI Accomplishments and Goals Report (Title VI Annual Work Plan) (23 CFR 200.9(b)(10))

- a. LPA developed a Title VI Annual Work Plan which consists of accomplishments for the past year, and goals for the next year
- b. Title VI Annual Work Plan made available to the public (i.e., public website or when requested)

Revised 03/25/25



Findings:

1a. LPA must have a Title VI Implementation (Title VI Plan) approved by the head of the agency. LPA reported an estimated date of 06/30/25 to complete a Title VI Plan. The Title VI Plan must include the following:

- Covers race, color, and national origin under Title VI of the Civil Rights Act of 1964
- Includes all the items listed in this checklist
- Posted on the LPA's website

1b. LPA's Title VI Plan must be no more than three years old. LPA must update the plan.

1c. LPA's Title VI Plan must cover race, color, and national origin under Title VI of the Civil Rights Act of 1964.

1d. LPA's Title VI Plan must cover all the items listed in the DLA FHWA Title VI Program Checklist.

1e. LPA's Title Plan must be posted on the LPA's website or be made available to the public.

2a. LPA must have a Title VI Coordinator responsible for the agency's Title VI Program. LPA reported an estimated date of to designate a Title VI Coordinator. The Title Coordinator must:

- Have access to the head of the agency
- Make contact information available to the public

2b. Title VI Coordinator must have access to the head of the agency.

2c. Title VI Coordinator's contact information must be available to the public (i.e., public website, post in publicly accessible areas). LPA reported an estimated date of to make the Title VI Coordinator's contact information available to the public.

3a. LPA must have a Title VI/Non-Discrimination Policy Statement. LPA reported an estimated date of 06/30/25 to have a Title VI/Non-Discrimination Policy Statement. The Title VI/Non-Discrimination Policy Statement must include the following:

- Covers race, color, and national origin under Title VI of the Civil Rights Act of 1964
- Signed by the head of the agency
- Make available to the public (i.e., public website, post in publicly accessible areas)

3b. LPA's Title VI/Non-Discrimination Policy Statement must cover race, color, and national origin under Title VI of the Civil Rights Act of 1964.

3c. LPA's Title VI/Non-Discrimination Policy Statement must be signed by the head of the agency. LPA reported an estimated date of to have the Title VI/Non-Discrimination Policy Statement signed by the head of the agency.

3d. LPA's Title VI/Non-Discrimination Policy Statement must be made available to the public (i.e., public website, post in publicly accessible areas).

4a. LPA must perform an LEP Assessment (Four Factor Analysis). LPA reported an estimated date of 06/30/25 to perform an LEP Assessment. The LEP Assessment must include the following:

- Covers race, color, and national origin under Title VI of the Civil Rights Act of 1964
- Signed by the head of the agency
- Make available to the public (i.e., public website, post in publicly accessible areas)

4b. LPA must perform an LEP Assessment annually.

4c. LPA must perform an LEP Assessment addressing the four factors identified in the U.S. Department of Transportation LEP Guidance.

4d. LPA must develop an LAP to ensure LEP persons have meaningful access to the LPA's program, services, and activities. LPA must update the LAP with new LEP Assessment results.

4e. LPA must make the LAP available to the public (i.e., public website, post in public accessible areas)

4f. LPA must have procedures for processing interpretation (verbal) or translation (written) requests. LPA reported an estimated date of 06/30/25 to develop procedures for processing interpretation or translation requests.

4g. LPA must have an LEP Log to track interpretation and translation services requested by the public or provided to the public.

Revised 03/25/25



Findings:

5a. LPA must develop Title VI information and disseminate to the general public and, where appropriate, in languages other than English (determined by the LEP Assessment). LPA reported an estimated date of 06/30/25 to complete Title VI materials.

5b. LPA must make Title VI information or materials to the public (i.e., public website, post in public accessible areas). LPA reported an estimated date of to distribute Title VI materials.

6a. LPA must provide Title VI training to all LPA employees every two years. LPA reported an estimated date of 09/30/25 to distribute Title VI materials. Title VI training must include the following:

- What is Title VI?
- How the LPA implements its Title VI program to meet federal requirements
- What steps to take for handling Title VI complaints, as well as language interpretation (verbal)/translation (written) requests

6b. LPA must provide Title VI training to all LPA employees every two years.

6c. LPA must provide Title VI training to all LPA employees. Title VI training must include the following:

- What is Title VI?
- How the LPA implements its Title VI program to meet federal requirements
- What steps to take for handling Title VI complaints, as well as language interpretation (verbal)/translation (written) requests

7a. LPA must sign the latest Master Agreement - Administering Agency-State Agreement for Federal-aid Projects (Exhibit 4-C), which includes the Title VI Assurances (Exhibit B of the Master Agreement). LPA reported an estimated date of 06/30/25 to sign the updated Master Agreement.

7b. LPA must include required Title VI assurances (specifically, Appendices A and E of the Title VI Assurances) in all sub-contracts and sub-agreements with federal funds. LPA reported an estimated date of 06/30/25 to sign the updated Master Agreement.

8a. LPA must develop a Title VI complaint form and make it available to the public. LPA reported an estimated date of 06/30/25 to develop the Title VI complaint form and make it available to the public.

8b. LPA must develop a Title VI complaint log and make it available to the public. LPA reported an estimated date of 06/30/25 to develop a Title VI complaint log to log Title VI complaints received from the public.

8c. LPA must develop procedures for prompt processing and disposition of Title VI complaints received directly by the agency. LPA reported an estimated date of 06/30/25 to develop Title VI complaint procedures.

8d. LPA must have Title VI complaint procedures that include logging Title VI complaints received and determining jurisdiction, as well as for completeness. LPA reported an estimated date of 06/30/25 to update the Title VI complaint procedures with the additional procedures.

8e. LPA must have Title VI complaint procedures that include forwarding Title VI complaints to Caltrans for processing. LPA reported an estimated date of 06/30/25 to update the Title VI complaint procedures with the additional procedures.

Revised 03/25/25



Findings:

9a. LPA must have procedures for the collection of statistical data (race, color, and national origin) of participants in, and beneficiaries of, federally funded roadway projects. LPA reported an estimated date of 06/30/25 to develop Title VI data collection procedures.

9b. LPA must have Title VI data collection procedures that include procedures for analyzing the data collected to determine the effectiveness of outreach methods, and to ensure that no group is excluded during the decision-making process or is not given an opportunity to voice their opinions or concerns. LPA reported an estimated date of 06/30/25 to develop Title VI data collection procedures.

10a. LPA must have a program to conduct internal Title VI reviews of program areas to ensure compliance with FHWA Title VI requirements. LPA reported an estimated date of 06/30/25 to develop internal Title VI review procedures.

10b. LPA must have a program to conduct external Title VI reviews of sub-awardees to ensure compliance with FHWA Title VI requirements. LPA reported an estimated date of 06/30/25 to develop external Title VI review procedures.

11a. LPA must have a Title VI Annual Work Plan which consists of accomplishments for the past year, and goals for the next year. LPA reported an estimated date of 06/30/25 to develop a Title VI Annual Work Plan.

11b. LPA must make the Title VI Annual Work Plan available to the public (i.e., public website or when requested). LPA reported an estimated date of to post the Title VI Annual Work Plan on its website or make it available by other means.

Revised 03/25/25

Please check next page for recommendations



Recommendations:

** Please note that although there are recommendations in this report, all findings listed under the "Findings" section above must be corrected to comply with FHWA Title VI requirements. **

2a. - 2c. Although the LPA answered that the LPA has a Title VI Coordinator who has access to the head of the agency, and the Title VI Coordinator's contact information is made available to the public, Caltrans is unable to verify whether the Title VI Coordinator handles FHWA Title VI compliance for the LPA since a Title VI Plan was not submitted. Therefore, item 2 is marked non-compliant.

Revised 03/25/25








FFY 2026 Caltrans Local Assistance Title VI Program Assessment Closeout Letter - City of Santa Rosa

Final Audit Report

2025-12-09

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