

C/CAG

City/County Association of Governments
of San Mateo County



FEDERAL HIGHWAY ADMINISTRATION

Title VI Implementation Plan

Prepared by the City/County Association of Governments
of San Mateo County (C/CAG)
in collaboration with Evan Brooks Associates, Inc.

March 2026



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INTRODUCTION

About City/County Association of Governments of San Mateo County

City/County Association of Governments of San Mateo County (C/CAG) was founded in 1990 as a Joint Powers Authority, tasked with working on issues that affect the quality of life in San Mateo County. As the Congestion Management Agency and County Transportation Agency for San Mateo County, C/CAG oversees State and Federal transportation funds and implements the Congestion Management Program to reduce auto-related congestion. Additionally, C/CAG manages the Countywide Water Pollution Prevention Program, ensuring compliance with the Municipal Regional Permit and oversees regional stormwater projects. C/CAG also acts as the Airport Land Use Commission for the County, implementing the three compatibility plans. Furthermore, C/CAG supports energy efficiency and climate initiatives through the Energy Watch and Regionally Integrated Climate Action Planning Support programs. C/CAG member agencies include the County of San Mateo and each of its 21 cities:

Atherton
Belmont
Brisbane
Burlingame
Colma
Daly City
East Palo Alto

Foster City
Half Moon Bay
Hillsborough
Menlo Park
Millbrae
Pacifica
Portola Valley

Redwood City
San Bruno
San Carlos
San Mateo
San Mateo County
South San Francisco
Woodside



Purpose of the Title VI Plan

C/CAG is a recipient of federal-aid highway funds from the Federal Highway Administration (FHWA). As a recipient of federal funds, C/CAG is required to adhere to a range of non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (Title VI). Title VI requires that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” [42 U.S.C.§2000d]

Subsequently, various other statutes added prohibitions against discrimination based on gender, age, disability, or socioeconomic status. In addition, the Civil Rights Restoration Act of 1987 defines the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal financial assistance.

Federal statutes and regulations require recipients of federal aid programs to prepare and implement a program to clarify roles, responsibilities, and procedures to ensure compliance with Title VI and related statutes. This Title VI Implementation Plan describes elements of C/CAG’s Title VI Program and provides the policy direction necessary to ensure compliance with Title VI.



This Title VI Plan shows how C/CAG, a recipient of federal highway funds, upholds civil rights protections and prevents discrimination.

NON-DISCRIMINATION POLICY STATEMENT

It is the policy of C/CAG that no person shall, on the grounds of race, color, national origin, or other protected status, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of C/CAG as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of C/CAG, including its contractors and anyone who acts on behalf of C/CAG. This policy also applies to the operations of any department or agency to which C/CAG extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification can be a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, or other protected status include: Denial to an individual any program, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregated or separate treatment; Unequal restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

Sean Charpentier, Executive Director

Date

TITLE VI OF THE CIVIL RIGHTS ACT AND RELATED AUTHORITIES

1964

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving Federal financial assistance (as implemented through 23 CFR 200.9 and 49 CFR 21).

1973

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.) prohibits discrimination on the basis of sex by recipients and sub-recipients of Federal financial assistance.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by recipients and sub-recipients of Federal financial assistance.

1975

The Age Discrimination Act of 1975 (Section 6101-6107, Title 42 U.S.C.) prohibits discrimination on the basis of age by recipients and sub-recipients of Federal financial assistance.

1987

The Civil Rights Restoration Act of 1987 (Public Law 200-209) clarifies that the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973 was to apply the nondiscrimination statutes to all programs of Federal-aid recipients, sub-recipients, contractors and vendors, whether all such activities are federally assisted or not.

1994

Executive Order 12898 (issued February 11, 1994) addresses Environmental Justice regarding minority and low-income populations and requires agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

2000

Executive Order 13166 (issued August 16, 2000) addresses improved access to resources for persons with limited English proficiency. Agencies are directed to evaluate programs and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the resources provided consistent with, and without unduly burdening, the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to resources and information to their LEP applicants and beneficiaries free of charge.

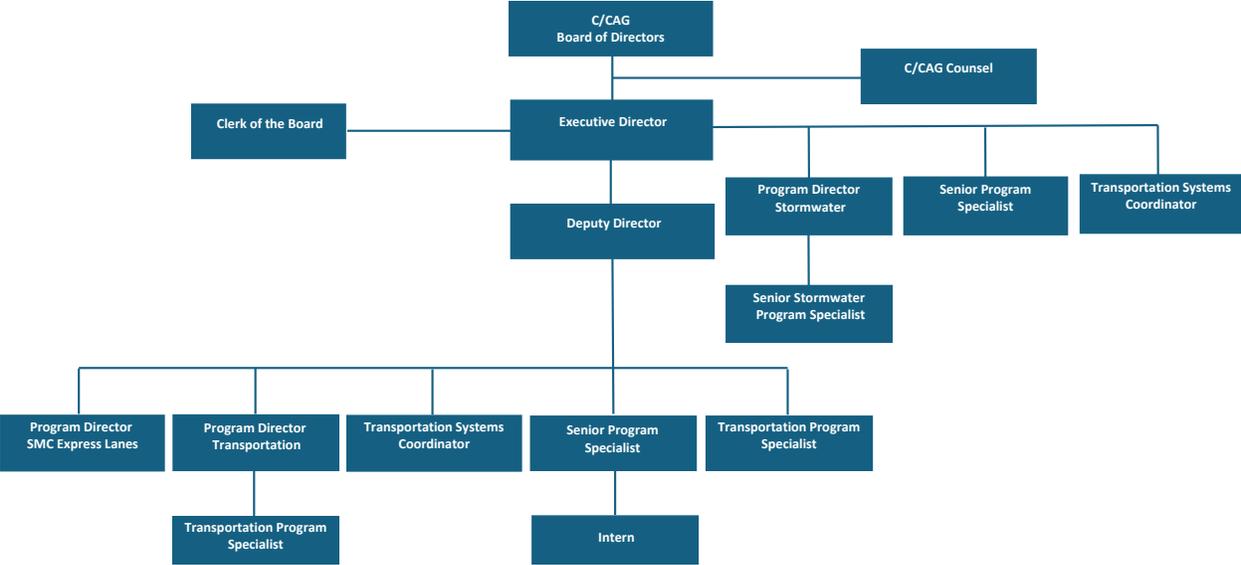
ORGANIZATION AND STAFFING

Organization

C/CAG is structured to deliver programs across transportation, stormwater management, and regional planning. **Figure 1** shows how responsibilities are distributed among the Board of Directors, executive leadership, program directors, and staff specialists to ensure coordinated decision-making and effective implementation.

Within this structure and consistent with guidance from the Federal Highway Administration (FHWA), the Title VI Coordinator is positioned within the C/CAG Program Director’s office, with dedicated responsibility for compliance and oversight. This placement ensures the Coordinator has the independence, visibility, and authority needed to monitor federally funded programs and provide agency-wide guidance on Title VI matters, while maintaining direct connection to program leadership and executive oversight.

Figure 1. Organizational Chart



Staffing

TITLE VI COORDINATOR RESPONSIBILITY

The Title VI Coordinator is responsible for implementing C/CAG's Title VI Program and coordinating C/CAG's compliance with Title VI and related statutes, regulations, and directives. General responsibilities of the Title VI Coordinator include but are not limited to the following:

- ✓ Submitting a Title VI plan and annual reports on C/CAG's behalf;
- ✓ Developing procedures for the prompt processing and disposition of complaints of discrimination based on race, color, national origin, or other protected status (i.e., Title VI complaints);
- ✓ Responding to, leading investigations of, and documenting resolutions for all Title VI complaints pursuant to the complaint procedures described in this plan. Maintaining a complaint log and reporting complaints received to state and federal agencies as appropriate and per the complaint procedures described in this plan;
- ✓ Participating in the design, development, and dissemination of Title VI information to the public;
- ✓ Coordinating Title VI program development with department directors and Title VI Liaisons;
- ✓ Supporting the development and implementation of Title VI training for C/CAG managers, supervisors, and staff; and
- ✓ Assisting program personnel to correct Title VI problems or discriminatory practices, policies, and programs found through self-monitoring and review activities.



The Title VI Coordinator manages complaints and investigations, prepares reports, leads outreach and training, and works with departments to prevent and correct discrimination.

TITLE VI NOTICE TO THE PUBLIC

To ensure that information about Title VI and related statutes is readily available to the public, C/CAG publishes informational materials, including a notice to the public, which is available in **Appendix A** of this plan. These materials are intended to communicate information about the public's rights under Title VI. These materials are available in English, Spanish, Chinese, Tagalog, and in other languages and formats upon request. The Title VI Coordinator will ensure that copies of the public notice are posted in highly visible and accessible locations within all C/CAG facilities, and in the lobby of C/CAG's Administration Building. Title VI materials are also available on C/CAG's website:

<https://ccag.ca.gov/about-us/title-vi/>



COMPLAINT PROCEDURES

Any person who believes they were subjected to discrimination by C/CAG’s programs because of their race, color, or national origin may file a written Title VI complaint with the C/CAG Title VI Coordinator within 180 days of the alleged discriminatory act(s).

How to File a Complaint

WHAT TO SUBMIT

A complaint form is available in **Appendix B** of this plan and online at <https://ccag.ca.gov/about-us/title-vi/>. C/CAG’s Title VI Coordinator will only process complaints that are complete, which include, at a minimum, the following:

- ✓ Complainant’s contact information;
- ✓ Date(s) of the alleged discriminatory act(s);
- ✓ Details of the alleged discrimination;
- ✓ Identification of the respondent (e.g., C/CAG department responsible for the alleged discrimination);
- ✓ Basis for the complaint (e.g., race, color, or national origin); and
- ✓ Signature of the complainant or complainant’s representative.

WHERE TO SUBMIT

Complaints should be signed and submitted in writing to C/CAG’s Title VI Coordinator using one of the contact methods provided in **Figure 2**. If a complaint is submitted via phone, C/CAG staff will make best efforts to transcribe the allegation on a complaint form and provide it to the complainant for confirmation or revision and signature before processing. If submitted via email, the email should include the signed and dated complaint as an attachment. Any person requiring a reasonable accommodation may contact the Title VI Coordinator to obtain assistance in filing a complaint.

Figure 2. Contact Methods



C/CAG Complaint Processing

C/CAG's Title VI Coordinator will process complaints received within 180 days of the alleged discriminatory act(s). After receiving a complaint, the Title VI Coordinator will record it in a complaint tracking log available in **Appendix C** and forward it to the Caltrans Office of Civil Rights (OCR). After receiving the complaint, OCR will determine which federal administering agency has jurisdiction to investigate/process the complaint as outlined on the next page.

TITLE VI COMPLAINTS PROCESSED UNDER THE FEDERAL HIGHWAY ADMINISTRATION (FHWA)

Per the FHWA Guidance Memorandum, Processing of Title VI Complaints, dated June 13, 2018, all Title VI complaints received by a sub-recipient (i.e., C/CAG) are to be forwarded to Caltrans to be submitted to FHWA Division Office. Complaints should be sent within one business day of receipt via email to Title.VI@dot.ca.gov. If 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.

CALTRANS OFFICE OF CIVIL RIGHTS (OCR) INVESTIGATION PROCESS

If OCR is delegated the responsibility of performing an investigation, OCR has 90 days to investigate the complaint. If additional time is needed, OCR will call the complainant and inform them.

If more information is needed to resolve the case, the OCR investigator may contact the complainant. The complainant has ten business days from the date of the letter to send the 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 ten business days, OCR can administratively close the case. A case can be administratively closed also if the Complainant no longer wishes to pursue their case.

OCR will consult with HCR regarding the disposition of the complaint. HCR will undertake disposition of the complaint 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 all parties via the FHWA Division Office.

A person may also file a complaint directly with:

Federal Highway Administration

U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-104
Washington, DC 20590

California Department of Transportation

Office of Civil Rights
Attention: Title VI Branch
PO Box 942874, MS 79
Sacramento, CA 94274
Title.VI@dot.ca.gov
(916) 639-6392

PUBLIC PARTICIPATION PLAN

Public Involvement Procedures

March 12, 2026



1. PURPOSE

The purpose of this Public Involvement Procedures document (**Appendix D**) is to outline how C/CAG will engage the public in a transparent, inclusive, and effective manner. These procedures aim to ensure that all individuals—regardless of race, color, national origin, income, English proficiency, or disability—have the opportunity to participate meaningfully in C/CAG’s programs. More details can be found in the 2023 C/CAG San Mateo County Equity Framework Report on public involvement.



2. GOALS OF PUBLIC INVOLVEMENT

C/CAG’s public involvement objectives are to:

- ✓ Promote broad participation in regional planning processes.
- ✓ Ensure early and continuous public involvement.
- ✓ Provide timely and accessible information.
- ✓ Reach underserved and underrepresented communities.
- ✓ Integrate feedback into decision-making processes.
- ✓ Comply with Title VI of the Civil Rights Act, the Americans with Disabilities Act (ADA), and other applicable federal, state, and local requirements.



3. GUIDING PRINCIPLES

- ✓ **Inclusivity:** Engage a broad cross-section of the community, including low-income, minority, disabled, and LEP populations.
- ✓ **Transparency:** Ensure public access to relevant information before decisions are made.
- ✓ **Accessibility:** Hold meetings in ADA-compliant locations and provide language resources when needed.
- ✓ **Timeliness:** Share information and provide opportunities for public comment early in the planning process.
- ✓ **Responsiveness:** Acknowledge and consider all public input received.



4. PUBLIC OUTREACH METHODS

C/CAG uses a variety of outreach methods to communicate with and engage the public:

✓ Notification Tools

- Public meeting notices
- Legal and general newspaper notices (e.g., San Mateo Daily Journal)
- Website postings on C/CAG’s website
- Social media announcements
- Flyers and brochures in English and other prevalent languages

✓ Participation Opportunities

- Public meetings, hearings, and workshops (both in-person and virtual)
- Surveys and comment forms
- Stakeholder focus groups
- Pop-up engagement at community events
- Outreach through community-based organizations

✓ Communication Materials

- Clear and concise content
- Translations of vital documents into Spanish and other languages as needed
- Materials in alternative formats for individuals with disabilities



5. PROCEDURES FOR PUBLIC MEETINGS

- ✓ **Advance Notice:** Publish notice at least 72 hours prior to meetings pursuant to The Brown Act.
- ✓ **Accessible Locations:** Host events at venues that are ADA-compliant and served by public transit.
- ✓ **Language Access:** Provide interpretation and translated materials when a significant number of participants are expected to be LEP.
- ✓ **Comment Periods:** Allow for public comment before and during a board/committee meeting, with written comment periods of at least 14 days for major planning efforts.
- ✓ **Documentation:** Record and summarize comments received and include them in decision-making reports.



6. TITLE VI AND ENVIRONMENTAL JUSTICE CONSIDERATIONS

C/CAG will make special efforts to reach populations that are traditionally underserved, including:

- ✓ Low-income and minority communities
- ✓ Limited English Proficient individuals
- ✓ Persons with disabilities

Efforts include targeted outreach, partnerships with community organizations, and translation of key documents.



7. EVALUATION AND UPDATES

C/CAG will evaluate the effectiveness of its public involvement efforts on a regular basis, using metrics such as:

- ✓ Number and diversity of participants
- ✓ Feedback received from public and stakeholders
- ✓ Engagement outcomes incorporated into plans

This Public Involvement Procedures document will be reviewed and updated at least every three years or as needed to reflect best practices and changing community needs.



8. CONTACT INFORMATION

For questions or to request accommodation and/or language assistance:

C/CAG Public Involvement Contact
City/County Association of Governments of San Mateo County
555 County Center, 5th Floor
Redwood City, CA 94063
Phone: (650) 453-0696
Email: TitleVICoordinator@smcgov.org
Website: <https://ccag.ca.gov/about-us/title-vi/>

LIMITED ENGLISH PROFICIENCY (LEP) PROGRAM

Introduction

C/CAG is committed to ensuring meaningful access to its programs for all individuals, including those with Limited English Proficiency (LEP; speaks English “less than very well”). In accordance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and Executive Order 13166, this LEP Plan outlines the policies and procedures C/CAG will implement to identify and assist LEP individuals in effectively participating in or benefitting from federally assisted programs performed by C/CAG.

Limited English Proficiency Defined

The U.S. Department of Justice’s LEP Guidance Document (released along with Executive Order 13166) states:

“*Most individuals living in the United States read, write, speak, and understand English. There are many individuals, however, for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understanding English, they are limited English proficient, or ‘LEP’.*” *“Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by Federally funded programs and activities. The Federal Government is committed to improving the accessibility of these programs and activities to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English.”*

Based on the above definition, LEP describes individuals that possess a limited ability to read, write, speak, or comprehend the English language.

The U.S. Census Bureau collects information on languages spoken at home through the American Community Survey. This data shows which languages people speak, and whether they speak English “very well” or “less than very well.” For LEP planning, individuals who speak English “less than very well” are counted as Limited English Proficient.

Four-Factor Analysis

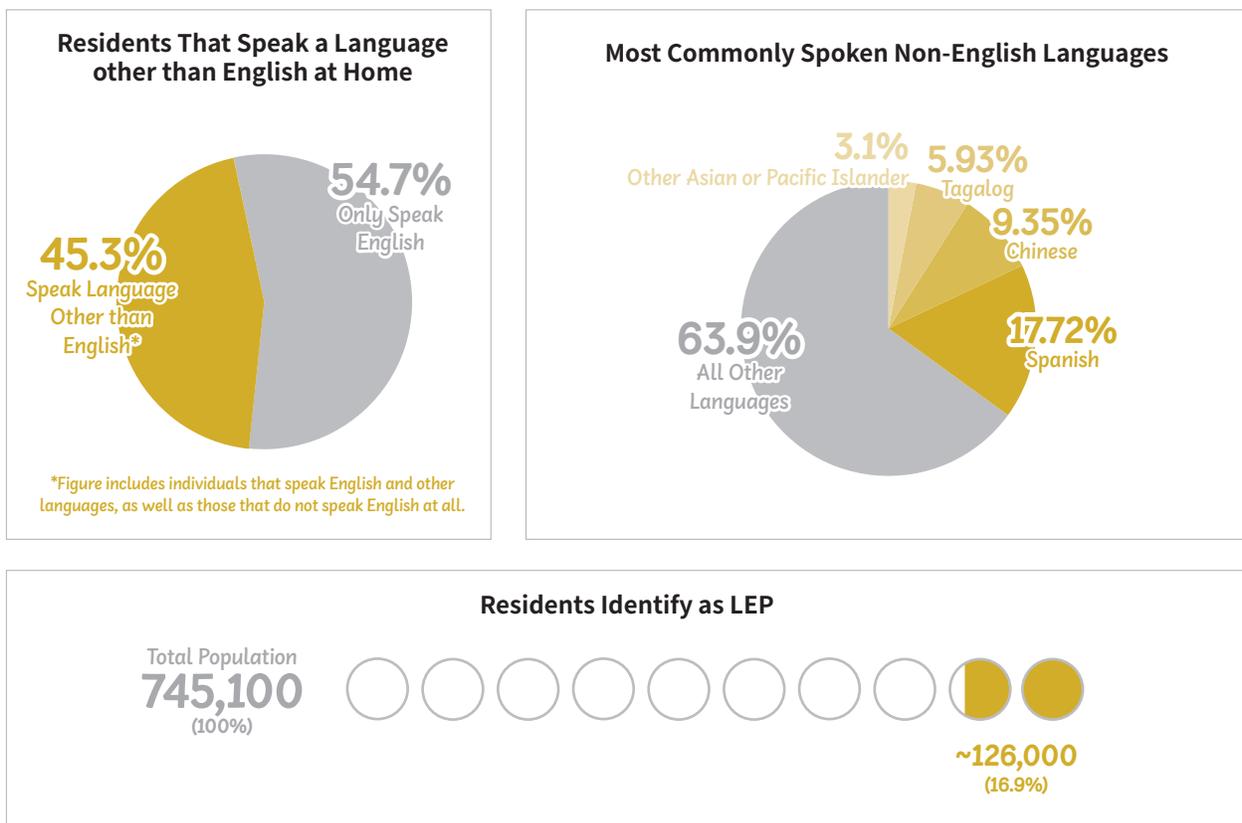
C/CAG conducted a Four-Factor Analysis to determine the level of language assistance needed to ensure meaningful access to its programs for individuals with Limited English Proficiency (LEP). This analysis helps determine which language assistance measures are appropriate and necessary based on the characteristics and needs of the populations C/CAG serves.

FACTOR 1: NUMBER OR PROPORTION OF LEP PERSONS SERVED

According to U.S. Census Bureau data (American Community Survey), a significant portion (45.3%) of San Mateo County’s population speaks a language other than English at home. The most commonly spoken non-English languages include:

- ➔ Spanish (17.72%)
- ➔ Chinese (Mandarin and Cantonese) (9.35%)
- ➔ Tagalog (5.93%)
- ➔ Other Asian or Pacific Islander (3.10%)

Figure 3. San Mateo County Languages Snapshot



SOURCE: U.S. Census Bureau's 2019-2023 American Community Survey, TABLE C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

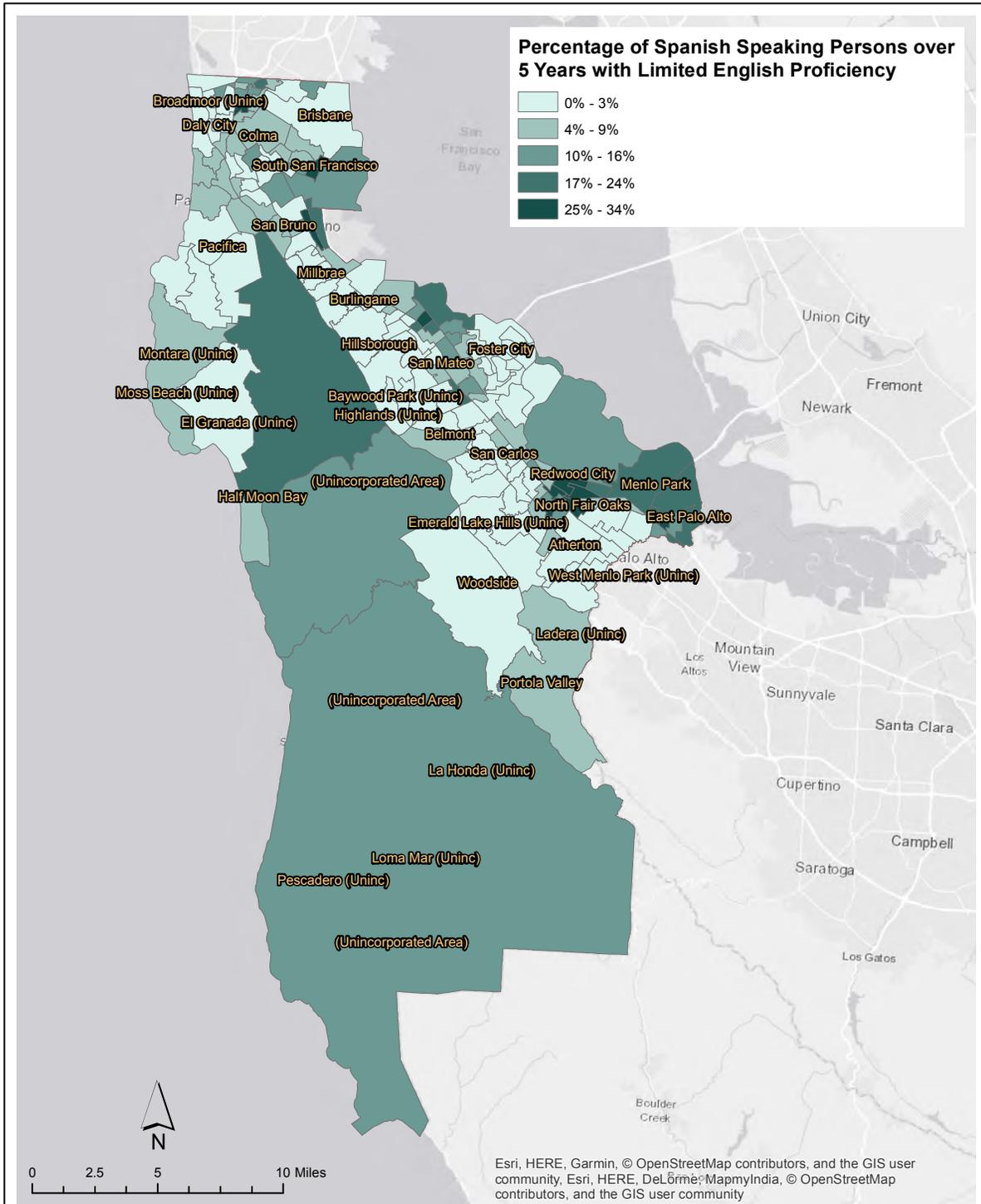
Additionally, 16.9% of San Mateo County residents (approximately 126,000 people out of about 745,000) identify as Limited English Proficient. **Figure 4** represents the number of LEP speakers disaggregated by languages spoken within the County:

Figure 4. San Mateo County Major Languages Spoken

Language	Estimate	Percentage	LEP %/Number of Speakers ¹
Speaks only English	386,575	54.73%	-
Spanish	125,135	17.72%	7.33%/51,737
Chinese (inc. Mandarin, Cantonese)	66,057	9.35%	3.96%/27,979
Tagalog (inc. Filipino)	41,878	5.93%	2.11%/14,948
Other Indo-European	28,783	4.08%	0.90%/4,547
Other Asian or Pacific Island	21,878	3.10%	1.07%/7,564
Russian, Polish, or other Slavic	11,133	1.58%	0.57%/4,046
Arabic	5,582	0.79%	0.28%/1,956
French, Haitian, or Cajun	4,615	0.65%	0.10%/686
Korean	4,547	0.64%	0.28%/1,967
Vietnamese	3,583	0.51%	0.18%/1,276
German or other West Germanic	3,408	0.48%	0.04%/307
Other	3,104	0.44%	0.09%/623

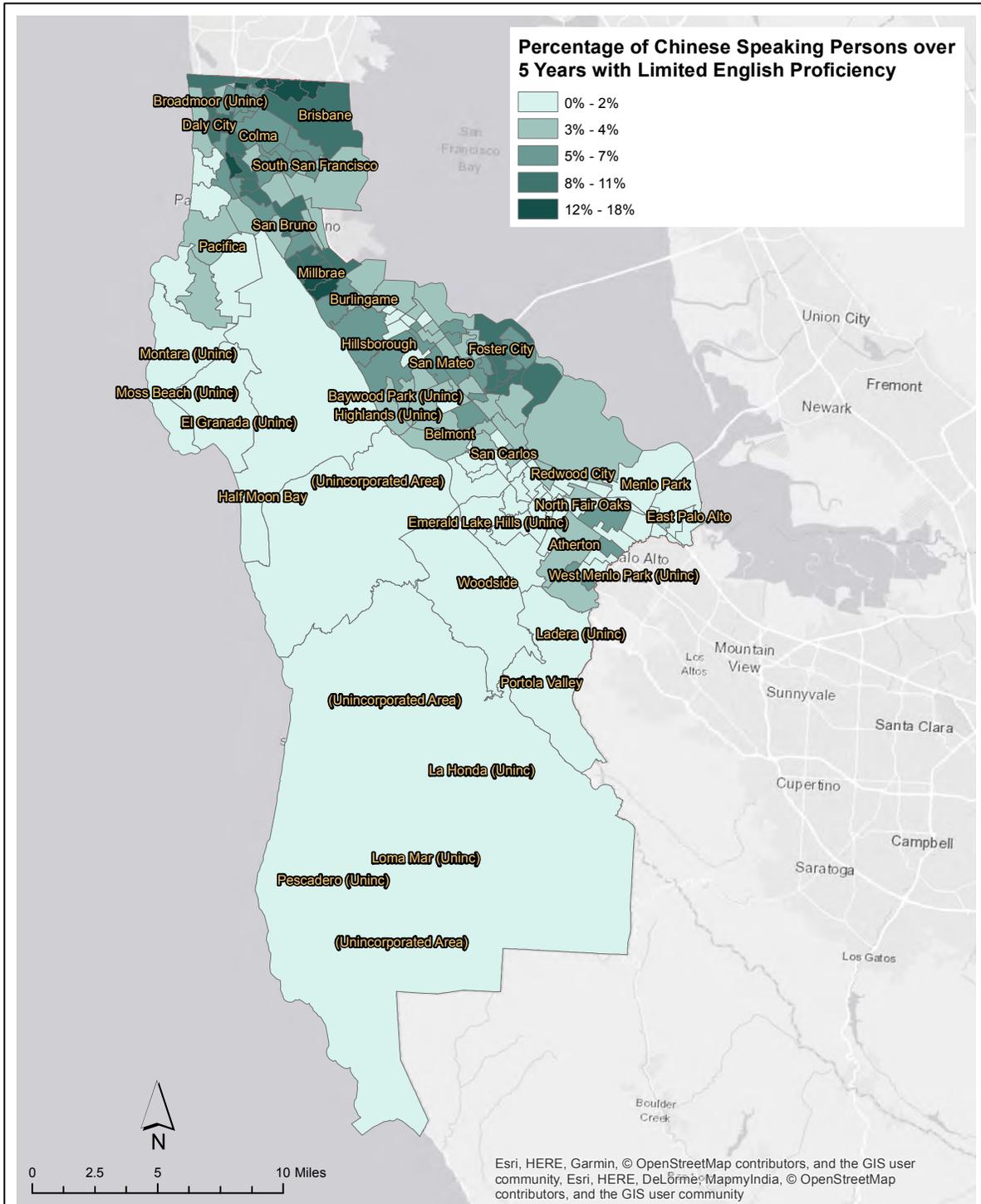
SOURCE: U.S. Census Bureau's 2019-2023 American Community Survey

¹ This means roughly 16.9% of the population in San Mateo County face challenges communicating in English, with Spanish-speaking individuals representing the largest LEP group. When evaluating which language assistance measures to implement, these figures highlight the significant need - particularly among Spanish-, Chinese-, and Tagalog-speaking communities.



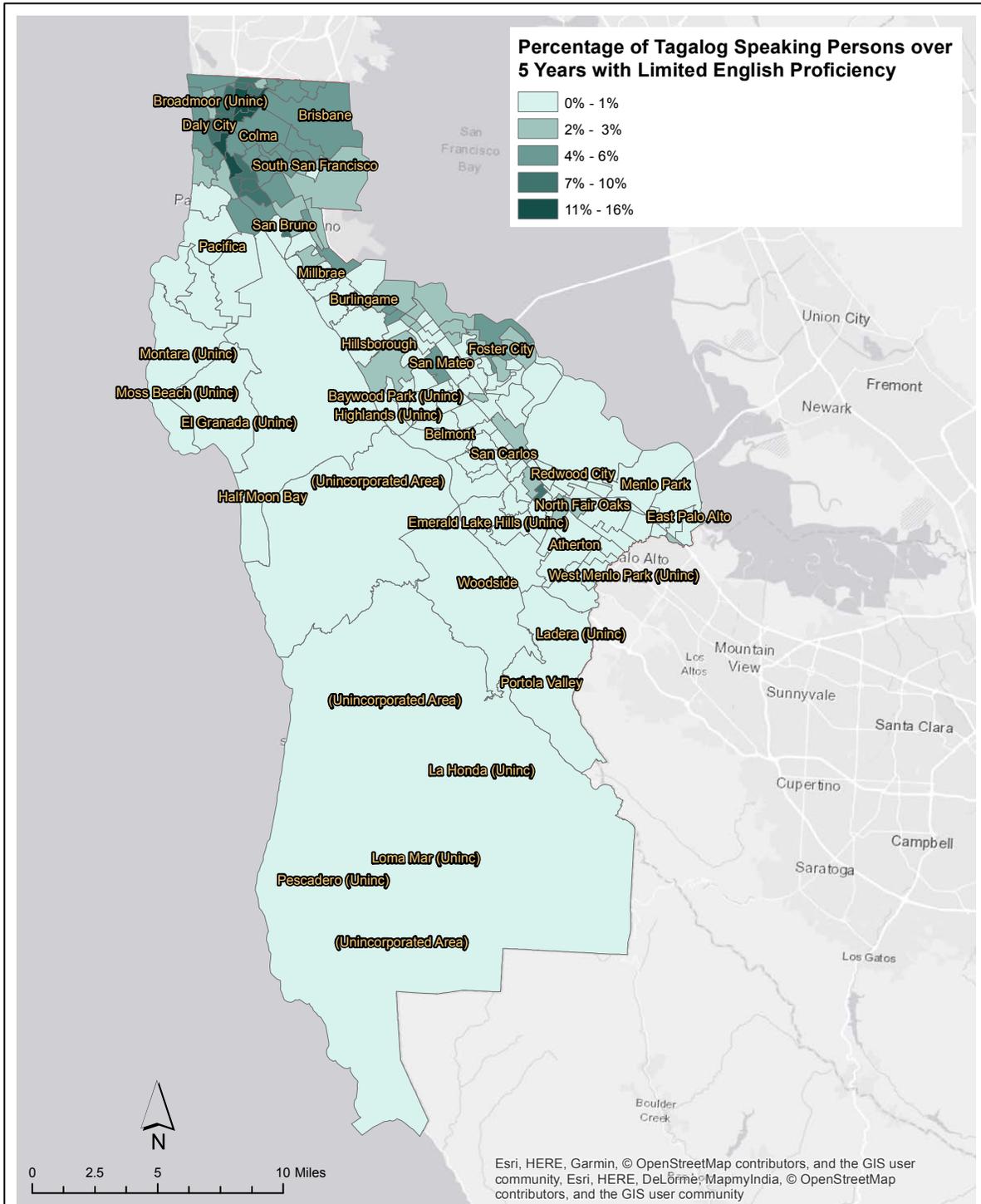
**San Mateo County
Spanish Speaking Persons with Limited English Proficiency**

Source: Table C16001, U.S. Census Bureau, 2023 American Community Survey 5-Year Estimates



**San Mateo County
Chinese Speaking Persons with Limited English Proficiency**

Source: Table C16001, U.S. Census Bureau, 2023 American Community Survey 5-Year Estimates



**San Mateo County
Tagalog Speaking Persons with Limited English Proficiency**

Source: Table C16001, U.S. Census Bureau, 2023 American Community Survey 5-Year Estimates

FACTOR 2: FREQUENCY OF CONTACT WITH LEP PERSONS

C/CAG regularly interacts with the public through transportation planning meetings, workshops, public notices, surveys, and community pop-up events in Equity Priority Communities (EPCs) such as East Palo Alto and North Fair Oaks (2023 Southeast San Mateo County Community-Based Transportation Plan).

Surveys and outreach consistently reveal strong demand for Spanish-language and other non-English support. Spanish-speaking residents are most frequently encountered among LEP populations, but high-contact communities also include Tagalog, Chinese, and Vietnamese speakers.

FACTOR 3: IMPORTANCE OF PROGRAMS

Many of C/CAG's programs—such as transportation planning, congestion management, and environmental initiatives—directly impact the public and LEP-heavy neighborhoods, such as improving commute options, transit access, and safe streets. Therefore, it is critical that all community members, including LEP individuals, understand and participate in these programs.

FACTOR 4: RESOURCES AVAILABLE AND COST

C/CAG has identified efficient and cost-effective language assistance strategies:

- ✓ **Bilingual staff and interpreters** (Spanish, Cantonese/Mandarin, Tagalog, Vietnamese) for public events.
- ✓ **Translated documents** (meeting notices, agendas, surveys) available in Spanish, Chinese, Tagalog, and Vietnamese provided upon request.
- ✓ **Telephonic interpretation**, to be contracted as resources allow, especially for less common languages.
- ✓ **Community partnerships** with local organizations to enable cost-sharing of translation, event interpretation, and outreach in priority languages.
- ✓ **Technology-assisted tools** (verified website translation resources) for key content.



Language Assistance Measures

C/CAG will provide the measures shown in **Figure 5**.

Figure 5. C/CAG Language Assistance Measures

Vital Documents Translation	Translate key documents into Spanish and other languages as deemed necessary based on the presence of large LEP populations in specific geographic areas upon request (e.g. North Fair Oaks, East Palo Alto).
Oral Interpretation Resources	Provide interpretation at public meetings upon request, with a focus on Spanish language needs. Interpretation will be provided in-person, by telephone, or virtually, depending on the format of the meeting and language requested.
Website Accessibility	Maintain translated materials functionality on C/CAG's website. Key landing pages and public-facing content will be prioritized for human translation where possible.
Signage and Notices	Include language access statements on public notices and meeting announcements. Post signage in English, Spanish, and other commonly spoken languages at public events and facilities.
Staff Trainings	Train staff on language access procedures and how to use interpretation resources. Training will include the use of "I Speak" cards and documentation protocols for LEP encounters.

Notification of LEP Resources

C/CAG will notify LEP individuals of available resources through:

- ➔ Bilingual public meeting notices
- ➔ Website postings
- ➔ Outreach materials
- ➔ Community partner organizations
- ➔ Statements in multiple languages indicating language assistance is available at no cost, including on all major public-facing documents, agendas, and feedback forms

Monitoring and Updating the LEP Plan

C/CAG will review and update this LEP Plan every three years or as needed. The review will assess:

- ✓ Changes in LEP population demographics
- ✓ Effectiveness of current language resources
- ✓ Feedback from the community and stakeholders
- ✓ Logs of interpreter requests and document translations completed to identify gaps and areas for improvement
- ✓ Recommendations from community-based organizations serving LEP populations in Equity Priority Communities

Staff Training

C/CAG will ensure that staff members understand the LEP Plan, including:

- ✓ How to access language resources
- ✓ How to respond to LEP callers and walk-ins
- ✓ How to use interpreter resources
- ✓ How to document LEP interactions
- ✓ How to identify vital documents and determine when translation or interpretation is required
- ✓ Annual refresher training and onboarding for new staff



C/CAG is committed to free language assistance, regular LEP Plan reviews, staff training, and complaint resolution.

Complaints

Individuals may file a complaint if they believe they have been denied access to C/CAG programs due to language barriers. Complaints may be submitted in writing to:

C/CAG Title VI Coordinator
City/County Association of Governments of San Mateo County
555 County Center, 5th Floor
Redwood City, CA 94063
(650) 453-0696
TitleVICoordinator@smcgov.org

Contact Information

For more information on this LEP Plan or to request language assistance, contact:

C/CAG Title VI Coordinator
Phone: (650) 453-0696
Email: TitleVICoordinator@smcgov.org
Website: <https://ccag.ca.gov/about-us/title-vi/>

ENVIRONMENTAL JUSTICE (EJ) AND EQUITY ANALYSIS

In accordance with Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), C/CAG staff will identify and address the environmental effects of federally funded policies, programs on minority and low-income populations. Staff will consider demographic data (e.g., CalEnviroScreen 4.0, ACS poverty data, mapping minority populations) during project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public's input and demographic data analysis will enable staff to develop measures to mitigate any potential adverse effects on minority and low-income populations.

DATA COLLECTION AND ANALYSIS

C/CAG staff may collect and analyze statistical demographic data of participants/beneficiaries of C/CAG’s federally-funded programs. This data comes from governmental sources responsible for collecting and vetting the information for consistency and accuracy, including the U.S. Bureau of Labor Statics, U.S. Census Bureau, U.S. Bureau of Economic Analysis, California Department of Finance, California Department of Labor, California Employment Development Department, and C/CAG, among others.

Additionally, C/CAG staff may collect project-specific demographic data through the course of conducting public outreach for C/CAG programs. This outreach may include communications to the public such as community surveys, door hangers, posters, emails, social media releases, press releases, public meetings, virtual meetings, and public comment through websites generated for projects.

Collecting and analyzing this data helps C/CAG determine the characteristics of the communities that are affected by its programs. This, in turn, helps C/CAG provide better, more equitable community engagement. For example, analyzing data from the U.S. Census Bureau’s American Community Survey helps C/CAG determine the languages spoken by the population served. This helps C/CAG align its translation resources with the needs of the public to ensure all have access to critical information.

C/CAG maintains data for the programs under its purview. Some examples of the analysis that may be derived from this data include:

- Summary of demographic characteristics of the population served;
- Distribution of benefits (dollars, facilities, systems, projects) to groups and communities;
- Projected population increases versus planned facilities and types of facilities;
- Language needs assessments; and
- Specific project impacts on different populations, such as air quality and noise impacts.

Through this analysis, C/CAG conducted a comprehensive evaluation of its core program areas, including transportation planning, project delivery, program implementation, and communications and public participation, to assess their impacts on protected populations and to ensure compliance with Title VI requirements. This evaluation encompassed a review of the geographic distribution of transportation investments, an assessment of the accessibility of public meetings and communication materials, and an analysis of the effectiveness of language assistance resources. The findings of this evaluation assist in identifying any disparate impacts or potential barriers to participation in C/CAG’s transportation decision-making processes and inform the development of targeted strategies to promote equity across all program areas.

TITLE VI TRAINING

At least every two years, C/CAG will provide Title VI training for its managers, supervisors, and staff. The training will be developed by C/CAG's Title VI Coordinator and made available online to all C/CAG employees. The Title VI training will cover at least the following areas:

- ➔ Review of C/CAG's Title VI Implementation Plan and other relevant documents;
- ➔ Language assistance resources and "I Speak Cards" offered for public use ([Appendix E](#));
- ➔ How to handle potential complaints; and
- ➔ Where to seek assistance for Title VI questions and concerns.

Additionally, links to Title VI resources from Caltrans, FHWA, and other relevant agencies will be posted on the program's website: <https://ccag.ca.gov/about-us/title-vi/>



PROGRAM REVIEW

Subrecipient Compliance

C/CAG will conduct annual performance monitoring of its subrecipients through desk reviews and/or site visits. The intent of these monitoring activities is to ensure subrecipients comply with their Title VI obligations. Through this monitoring, C/CAG will review subrecipient logs of Title VI-related complaints, investigations, and lawsuits; will verify that subrecipients have posted a Title VI Notice in transit vehicles, their websites, and other public spaces; and will check that subrecipients have met their translation requirements per their Language Assistance Plan.

C/CAG subrecipients of Federal Highway Administration (FHWA) funds will also be required to have compliant Title VI Programs prior to execution of funding agreements with C/CAG. Although the FHWA and Caltrans do not have a similar requirement, these Programs provide a built-in opportunity for C/CAG to review the Title VI policies and practices of many of its subrecipients.

TITLE VI ASSURANCES

C/CAG will ensure that contract documents and agreements for federally funded projects include the necessary Title VI assurances. These include the standard Title VI assurances and non-discrimination provisions required by the U.S. Department of Transportation (USDOT) for all federal aid contracts funded by the Federal Highway Administration (FHWA). These are also known as Appendices A through E and are attached to this plan in **Appendix F** for reference. The standard assurances are subject to change by any new implementation of policy by coordinating agencies (i.e., USDOT, FHWA, Caltrans etc.).



APPENDIX



PUBLIC NOTICE

City/County Association of Governments of San Mateo County
Title VI Implementation Plan

WHAT IS TITLE VI?

This notice is to inform you of the City/County Association of Governments of San Mateo County (C/CAG) Title VI Implementation Plan. C/CAG is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other non-discriminatory authorities, such that no person shall be discriminated on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, gender identity, or any other category protected by State or Federal law.

Any person who believes they have been discriminated against may file a Title VI complaint with C/CAG's Title VI Coordinator. The complaint must be filed within 180 days of the date of the alleged discrimination. To file a formal complaint, please complete and sign the Title VI complaint form and submit it to the C/CAG Title VI Coordinator via mail, email, or in person:

Title VI Coordinator
555 County Center, 5th Floor
Redwood City, CA 94063
TitleVICoordinator@smcgov.org
(650) 453-0696

Complainants will receive a written response acknowledging receipt of the complaint. Complaints may also be filed directly with:

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

California Department of Transportation
Office of Civil Rights
Attention: Title VI Branch
PO Box 942874, MS 79
Sacramento, CA 94274
Title.VI@dot.ca.gov
(916) 639-6392



COMPLAINT FORM

City/County Association of Governments of San Mateo County
Title VI Implementation Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. If you believe you have been treated unfairly by programs administered by the City/County Association of Governments of San Mateo County (C/CAG) because of your race, color, or national origin, you may file a complaint using this form. If you need help filling it out or have any questions, please call (650) 453-0696.

Instructions: Please complete both pages of this form. Include and label all additional pages and attachments as necessary.

Section I: Complainant Information

Full Name: _____

Address: _____

Home Phone: _____ Work Phone: _____

Email Address: _____

Section II: Complaint Details

1. Are you filing this complaint on your own behalf?

Yes No

If not, please provide the name and relationship of the person for whom you are complaining:

Please explain why you are filing on their behalf:

2. Which of the following best describes the basis of the alleged discrimination?

Check all that apply:

Race Color National Origins (e.g., ethnicity, ancestry, language)

Other: _____

3. Date of alleged discrimination: _____

4. Location of incident: _____

5. Describe the alleged discriminatory act(s):

(Include how others were treated differently, and why you believe discrimination occurred. Attach additional pages if necessary.)

Section III: Additional Information

6. Have you previously filed a Title VI complaint with this agency?

Yes No

7. Have you filed this complaint with any other agency (e.g., federal, state, or local)?

Yes No

If yes, check all that apply:

Federal Agency State Agency Local Agency

Other: _____

Agency Name: _____

Date Filed: _____

Section IV: Signature

By signing, I hereby certify that all information is true and correct to the best of my knowledge.

Signature: _____

Date: _____

Section V: Submission

Please submit this form to:

C/CAG Title VI Coordinator
City/County Association of Governments of San Mateo County
555 County Center, 5th Floor
Redwood City, CA 94063
Phone: (650) 453-0696
Email: TitleVICoordinator@smcgov.org





PUBLIC PARTICIPATION PLAN

City/County Association of Governments of San Mateo County
Title VI Implementation Plan

Public Involvement Procedures

March 12, 2026



1. PURPOSE

The purpose of this Public Involvement Procedures document is to outline how the City/County Association of Governments of San Mateo County (C/CAG) will engage the public in a transparent, inclusive, and effective manner. These procedures aim to ensure that all individuals—regardless of race, color, national origin, income, English proficiency, or disability—have the opportunity to participate meaningfully in C/CAG’s programs. More details can be found in the 2023 C/CAG San Mateo County Equity Framework Report on public involvement.



2. GOALS OF PUBLIC INVOLVEMENT

C/CAG’s public involvement objectives are to:

- ✓ Promote broad participation in regional planning processes.
- ✓ Ensure early and continuous public involvement.
- ✓ Provide timely and accessible information.
- ✓ Reach underserved and underrepresented communities.
- ✓ Integrate feedback into decision-making processes.
- ✓ Comply with Title VI of the Civil Rights Act, the Americans with Disabilities Act (ADA), and other applicable federal, state, and local requirements.



3. GUIDING PRINCIPLES

- ✓ **Inclusivity:** Engage a broad cross-section of the community, including low-income, minority, disabled, and LEP populations.
- ✓ **Transparency:** Ensure public access to relevant information before decisions are made.
- ✓ **Accessibility:** Hold meetings in ADA-compliant locations and provide language resources when needed.
- ✓ **Timeliness:** Share information and provide opportunities for public comment early in the planning process.
- ✓ **Responsiveness:** Acknowledge and consider all public input received.



4. PUBLIC OUTREACH METHODS

C/CAG uses a variety of outreach methods to communicate with and engage the public:

- ✓ **Notification Tools**
 - Public meeting notices
 - Legal and general newspaper notices (e.g., San Mateo Daily Journal)
 - Website postings on C/CAG's website
 - Social media announcements
 - Flyers and brochures in English and other prevalent languages

- ✓ **Participation Opportunities**
 - Public meetings, hearings, and workshops (both in-person and virtual)
 - Surveys and comment forms
 - Stakeholder focus groups
 - Pop-up engagement at community events
 - Outreach through community-based organizations

- ✓ **Communication Materials**
 - Clear and concise content
 - Translations of vital documents into Spanish and other languages as needed
 - Materials in alternative formats for individuals with disabilities



5. PROCEDURES FOR PUBLIC MEETINGS

- ✓ **Advance Notice:** Publish notice at least 72 hours prior to meetings pursuant to The Brown Act.
- ✓ **Accessible Locations:** Host events at venues that are ADA-compliant and served by public transit.
- ✓ **Language Access:** Provide interpretation and translated materials when a significant number of participants are expected to be LEP.
- ✓ **Comment Periods:** Allow for public comment before and during a board/committee meeting, with written comment periods of at least 14 days for major planning efforts.
- ✓ **Documentation:** Record and summarize comments received and include them in decision-making reports.



6. TITLE VI AND ENVIRONMENTAL JUSTICE CONSIDERATIONS

C/CAG will make special efforts to reach populations that are traditionally underserved, including:

- ✓ Low-income and minority communities
- ✓ Limited English Proficient individuals
- ✓ Persons with disabilities

Efforts include targeted outreach, partnerships with community organizations, and translation of key documents.



7. EVALUATION AND UPDATES

C/CAG will evaluate the effectiveness of its public involvement efforts on a regular basis, using metrics such as:

- ✓ Number and diversity of participants
- ✓ Feedback received from public and stakeholders
- ✓ Engagement outcomes incorporated into plans

This Public Involvement Procedures document will be reviewed and updated at least every three years or as needed to reflect best practices and changing community needs.



8. CONTACT INFORMATION

For questions or to request accommodation and/or language assistance:

C/CAG Public Involvement Contact
City/County Association of Governments of San Mateo County
555 County Center, 5th Floor
Redwood City, CA 94063
Phone: (650) 453-0696
Email: TitleVICoordinator@smcgov.org
Website: <https://ccag.ca.gov/about-us/title-vi/>





WE SPEAK YOUR LANGUAGE!

City/County Association of Governments of San Mateo County

I SPEAK...

ENGLISH

I speak English. I need a translator. (You have the right to use free translation resources.)

SPANISH

Hablo español. Necesito un traductor. (Tiene derecho a utilizar recursos de traducción gratuitos.)

CHINESE

我说中文。我需要翻译。（您有权使用免费的翻译资源。）

TAGALOG

Nagsasalita ako ng Tagalog. Kailangan ko ng tagasalin. (May karapatan kang gumamit ng libreng magkukunan ng pagsasalin.)



TITLE VI ASSURANCE APPENDIX A-E

City/County Association of Governments of San Mateo County

During the performance of a contract that is federally funded, 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 Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, 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 performed by it during the contract, will not discriminate on the grounds of race, color, national origin, age, sex, or disability 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. Solicitation 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 the Regulations relative to Nondiscrimination on the grounds of race, color, national origin, age, sex, or disability.

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 or the FHWA 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 or the FHWA, 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 FHWA may determine to be appropriate, including, but not limited to:

1. withholding payments to the contractor under the contract until the contractor complies; and/or
2. cancelling, 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 or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or 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.



TITLE VI ASSURANCE APPENDIX B

City/County Association of Governments of San Mateo County

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting 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 the California Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23 U.S.C., the regulations for the administration of the preceding statute, and the policies and procedures prescribed by the FHWA of 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 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the California Department of Transportation 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 the California Department of Transportation 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 the California Department of Transportation, its successors and assigns.

The California Department of Transportation, in consideration of the conveyance of said lands and interest 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 the California Department of Transportation will use the lands and interests in lands and interest 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, Nondiscrimination 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 lands, 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.)



TITLE VI ASSURANCE APPENDIX C

City/County Association of Governments of San Mateo County 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 the California Department of Transportation 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, the California Department of Transportation 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 a deed, in the event of breach of any of the above Non discrimination covenants, the California Department of Transportation 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 the California Department of Transportation 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.)



TITLE VI ASSURANCE APPENDIX D

City/County Association of Governments of San Mateo County 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 the California Department of Transportation 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 furnishings of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits or, 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, set forth in this Assurance.

B. With respect to (licenses, leases, permits, etc.) in the event of breach of any of the above of the above Non-discrimination covenants, the California Department of Transportation will have the right to terminate the (license, permits, etc., as appropriate) and to 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 Nondiscrimination covenants, the California Department of Transportation will there upon revert to and vest in and become the absolute property of the California Department of Transportation 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.)

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, 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 CR 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 U.S.C. § 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);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination of the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 - 12189) as implemented by Department of Transportation regulations 49 C.F.R. parts 37 and 38;
- 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 Low-Income Populations, which ensures discrimination against minority populations by discouraging policies and programs 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. 1681 et seq).

Report Prepared By:



In collaboration with:

evan
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