

# California Department of Transportation

Caltrans Division of Local Assistance

## Title VI of the Civil Rights Act of 1964 Desk Assessment Compliance Review



In collaboration with



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## Caltrans Title VI Desk Assessment Compliance Review Executive Summary

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## Introduction

As subrecipients of federal funding, California's local agencies are required to maintain compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and related statutes. Local agencies include public entities such as cities, counties, universities and other special districts.

An assessment of selected local agencies that receive funding as a subrecipient of the California Department of Transportation (Caltrans) was performed from October of 2018 through December of 2019 and was conducted as a desk assessment. Disability Access Consultants, LLC (DAC) was contracted by the California Department of Transportation Division of Local Assistance (DLA) to conduct desk assessments of selected local Caltrans agencies to review and report compliance with Federal-aid Highway Program Funds and federal regulations including Title VI of the Civil Rights Act of 1964.

DAC is a woman founded California company established by Barbara Thorpe in 1998 to assist Title II entities to comply with civil rights and accessibility laws such as the Americans with Disabilities Act (ADA) and related standards and regulations, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and related compliance regulations such as inclusion of Disadvantaged Business Enterprise (DBE) firms on federally funded public entity projects. DAC has extensive experience in the evaluation of program and facility accessibility and provides a full continuum of Americans with Disabilities Act (ADA) and accessibility services for public entities. DAC has provided services for the past 22 years to assist public entities to comply and implement accessibility requirements in accordance with the ADA, Title 24 of the California Building Code, California Manual on Uniform Traffic Control Devices (CAMUTCD), Public Right-of-Way Accessibility Guidelines (PROWAG), Caltrans Standards and Specifications, Section 504, Title VI, DBE and related federal, state and local disability-related nondiscrimination laws and regulations.

Key DAC staff that were instrumental in providing Caltrans with an ADA desk assessment review program for local agencies were:

- Barbara Thorpe, DAC President and Project Manager
- Jennie Grover, Director of Operations

DAC reviewed local city, county and special district agencies and provided reports of compliance with Federal-aid Highway Program Funds and federal regulations including Title VI of the Civil Rights Act of 1964 to the California Department of Transportation (Caltrans). One goal of the assessments was to identify strengths and weaknesses in the processes and practices of local government agencies in accordance with nondiscrimination compliance standards and regulations as specified in Federal laws. The assessments were designed to identify local agency practices to ensure that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Assessments were performed under the following authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq)
- Section 162(a) of the Federal-Aid highway Act of 1973 (23 USC 324)
- Age Discrimination Act of 1975
- Section 504 of the Rehabilitation Act of 1973
- American with Disabilities Act of 1990
- Civil Rights Restoration Act of 1987
- 23 CFR, Subchapter C, Part 200, Section 200.9(b)(7)
- 49 CFR, Part 200, Section 200.9 (b)(7)
- Presidential Executive Order 12898 (Environmental Justice)
- Presidential Executive Order 13166 (Limited English Proficiency)
- LAPM (Local Assistance Procedure Manual), Chapter 9

The assessments focused on the local agency's compliance with the requirements of Title VI of the Civil Rights Act of 1964 and its related statutes.

## **Background**

Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

The California Department of Transportation (Caltrans) Division of Local Assistance (DLA) is responsible for funding local agency projects and programs that utilize federal funds. The DLA Title VI of the Civil Rights Act of 1964 (Title VI) Program compliance and oversight function resides in the Office of Guidance and Oversight (GO). Caltrans conducts program reviews of subrecipients of federal financial assistance to ensure compliance with Title VI requirements pursuant to 23 CFR 200.9(b)(7). Corrective action may be required, where applicable.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based upon race, color, and national origin. Specifically, 42 USC 2000d states, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

In addition to Title VI of the Civil Rights Act of 1964, other nondiscrimination statutes afford legal protection under the Federal Highway Administration's (FHWA) Title VI Program. Two Presidential Executive Orders place further emphasis on the Title VI protections of race and national origin and are included in the scope of the FHWA's Title VI Program:

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. The order is also intended to promote nondiscrimination in federal programs substantially affecting human health and the environment, and to 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.

Executive Order 13166, "Improving Access To Services For Persons With Limited English Proficiency," directs federal agencies to evaluate services provided and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the services provided, consistent with, and without unduly burdening, the fundamental mission of the local agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to programs, services, and information to their LEP applicants and beneficiaries free of charge.

Taken together, these requirements define an over-arching Title VI nondiscrimination program. Title VI and the additional nondiscrimination requirements are applicable to all programs and activities administered by a recipient, in addition to programs receiving federal financial assistance, due to the Civil Rights Restoration Act of 1987. Nondiscrimination provisions apply to all programs and activities of federal-aid recipients, sub-recipients, and contractors, regardless of tier (49 CFR 21).

## **Desk Assessment Objectives**

The California Department of Transportation Division of Local Assistance contracted services to conduct desk assessments in 2018 and 2019 focused on the local agency's compliance with the requirements of Title VI of the Civil Rights Act of 1964.

The overall objective of the desk assessment project is to evaluate the existing levels of compliance with the requirements of Title VI of the Civil Rights Act of 1964 for each of the local agencies. The

assessment is designed to identify the areas and levels of compliance support needed by subrecipients from the Caltrans Division of Local Assistance (DLA). The results of the assessment will assist Caltrans to develop effective monitoring and training programs, as well as guidance materials that will be offered to the local agencies to support their compliance efforts.

To prepare the executive summary in a condensed format, the compliance areas examined were compiled into seven (7) general compliance areas for reporting purposes:

1. Title VI Coordinator
2. Title VI Staff Training
3. Title VI Implementation Plan
4. Dissemination of Title VI Information to the Public
5. Complaint Procedure
6. Data Collection
7. Limited English Proficiency Plan

Detailed response information captured from the review of each agency's returned questionnaire and attachments were provided to Caltrans in comprehensive project workbooks that were used to compose the Executive Summary.

### **Approach and Methodology**

DAC worked with the Caltrans DLA to compile the list of agencies that would be included in the 2018-2019 assessment project. A selection of agencies was made from each of the twelve (12) Caltrans Districts to ensure a broad and inclusive assessment sample. The agencies selected were designed to be a representative sample from each District and do not include all Caltrans subrecipient agencies from each District. A monthly schedule was developed for each District's agencies to be contacted over the course of approximately eight (8) months.

To collect the information needed to assemble the compliance report, a questionnaire comprised of approximately twenty-three (23) questions and requests for documents was developed by Caltrans and provided to Disability Access Consultants, LLC (DAC) to be sent to each subrecipient agency. The questionnaire was designed to ensure that details for specific compliance topics were requested. In addition to providing a text response for each question, agencies were also asked to provide attachments that verified responses to selected questions, such as including a copy of the Title VI Implementation Plan document, examples of public notices in languages other than English and the procedure for processing complaints.

An initial goal was the identification of the Title VI Coordinator for each agency as a list was not available. Several methods were initiated to determine if agencies had identified a Title VI Coordinator. DAC made phone calls to the agencies, sent emails to executive management and searched the agency's websites.

Using an established schedule, each agency received an initial notice letter from DAC describing DAC's consultant relationship with Caltrans and the purpose for the Desk Compliance Review Project. The letter also included a summary of the compliance requirements of Caltrans subrecipients and the purpose of the desk assessment project. The initial notice letters were provided to the agency approximately one month in advance of the response questionnaire being sent. The method for sending the initial notice letter and questionnaire was by email when the contact information for the Title VI Coordinator was known, or by mail when the direct contact information could not be confirmed.

Following the notice letters about the upcoming desk assessment, letters requesting information (questionnaires) were sent to the agencies selected for the desk assessment. The transmittal letters

that were sent to the agencies along with the questionnaire included options for returning the responses to DAC. Although completed questionnaires and attachments were requested to be directed to DAC, a few agencies provided the response packet directly to Caltrans. The responding agencies used a variety of methods to provide documents and files including:

- Emailing documents to DAC or Caltrans
- Uploading documents to DAC’s online file sharing account
- Granting DAC temporary access to the agency’s FTP site
- Providing links to agency website locations where documents are stored or otherwise available
- Mailing flash drives with documents and files to DAC or Caltrans
- Mailing hard copies and binders with documents and files to DAC or Caltrans

### Caltrans Districts

Statewide, Caltrans is comprised of twelve (12) service areas or Districts, each with its own District Office to support the region’s cities, towns, counties and special districts (agencies). A District map and information on the city or county governments that comprise each District is included as Appendix A. A list of agencies from each District that responded to the assessment information request is also included in Appendix A.

### Summary of Responses by District

This assessment of Caltrans subrecipient agencies included a selected list for review to represent a sample of cities, counties and special districts within each Caltrans District and is not a comprehensive review of all Caltrans subrecipient agencies. The assessment included a selected list of two hundred and fifty-three (253) local agencies across all twelve Caltrans Districts. Of the agencies contacted, one hundred and four (104) responses were received.

The following chart indicates the number of agencies contacted and the number of agencies that responded, followed by the calculated percentage of the responding agencies.

<b>Summary of Agency Responses</b>			
	Number of Agencies Contacted from the Caltrans Representative Sample List for Each District	Number of Agencies that Responded	Response Percentage
District 1	15	7	47
District 2	17	8	47
District 3	22	11	50
District 4	53	20	38
District 5	14	5	36
District 6	31	11	35
District 7	28	13	46
District 8	24	7	29
District 9	3	3	100
District 10	24	8	33
District 11	13	9	69
District 12	9	2	22
<b>TOTALS</b>	<b>253</b>	<b>104</b>	<b>41</b>

## Analysis of Responses

The analysis of the data collection and assessment for compliance described key areas of compliance and deficiencies or noncompliance by District.

A detailed matrix of the levels of compliance for agencies in each District is included as Appendix B. A summary matrix of all agencies reviewed is included as Appendix C. Detailed information from the questionnaires and documents sent by each agency was used for the analysis of strength and weaknesses related to Title VI compliance.

### District Average Areas of Compliance

In a review of the responses provided by each agency, as well as review of additional relevant information that is publicly available, review of agency websites and other search tools, the following percentages of all agencies reviewed were found to be compliant for specific selected criteria.

Title VI Coordinator.....	33%
Title VI Staff Training.....	16%
Title VI Implementation Plan.....	29%
Dissemination of Title VI Information to the Public.....	38%
Complaint Procedure.....	36%
Data Collection.....	20%
LEP.....	41%

### General Discussion of Findings and Trends

The majority of the responding agencies, eighty percent (80%), indicated that a Title VI Coordinator had been appointed. Of those agencies, however, only thirty-three percent (33%) were also able to provide public notices that showed the identity and contact information for the Title VI Coordinator. Forty-seven percent (47%) of responding agencies that stated a Title VI Coordinator was appointed but did not have the identity and contact information for the Title VI Coordinator publicly available. Although other areas of noncompliance existed, the most frequent areas of deficiency and noncompliance included:

1. Lack of a formal procedure to provide Title VI training to staff. Providing training to staff regarding nondiscrimination under Title VI in programs and services offered to the public was found to be weak. Only sixteen percent (16%) of responding agencies were able to provide confirmation that staff receive training on Title VI nondiscrimination to their program participants. Forty-eight percent (48%) of agencies responded that training is provided regarding nondiscrimination in the workplace, or stated they provide training but did not include a description the curriculum to verify that training is for services to the public and not only in the workplace. Thirty-seven percent (37%) responded that there was no established training program.
2. Lack of a Title VI Implementation Plan. Only twenty-nine percent (29%) of responding agencies were able to provide a complete Title VI Implementation Plan for the agency's programs and services. An additional twenty-four percent (24%) provided a plan that was developed and written for a specific division, such as transit or housing, or had started to develop a plan that was not completed and implemented at the time of the analysis. Forty-seven percent (47%) of agencies did not have any records of a Title VI Implementation Plan.
3. Lack of dissemination of Title VI information to the public in languages other than English. While sixty-seven percent (67%) of responding agencies were able to provide examples of Title VI nondiscrimination statements, only thirty-eight percent (38%) had examples of the notices in English and languages other than English.

4. Lack of Title VI complaint procedure for program participants. Most of the responding agencies, seventy-one percent (71%), provided a complaint procedure. Of those, thirty-six percent (36%) had a detailed procedure specifically for resolving Title VI complaints filed by the public. Another thirty-six percent (36%) provided a procedure that was incomplete or was composed for use by staff to file a workplace discrimination complaint.
5. Lack of procedures for statistical data collection. An area that is shown to need improvement is the collection of statistical data for the agency's program participants. Only twenty percent (20%) of responding agencies responded with a formal process to collect information on their program participants to help ensure that the agency's programs are effectively serving its beneficiaries without negatively affecting segments of its population.
6. Lack of a Limited English Proficiency (LEP). Forty-one percent (41%) of responding agencies had a formal Limited English Proficiency (LEP) language assistance plan based in part on a four-factor analysis needs assessment. Although fifty percent (50%) of responding agencies did not have a written LEP plan, informal procedures for providing services in languages other than English to program participants were evident. Agencies without a formal LEP plan provided employment agreements for bilingual staff positions and also offered examples of public notices translated into languages other than English.

## Recommendations to Improve Compliance

### 1. Staff Training

Training and support are indicated as a need to assist the agencies with achieving and maintaining full compliance with all Title VI laws and regulations. Training and informational packets or modules will assist with understanding the Title reporting and implementation requirements and methods and strategies to achieve and maintain compliance.

- a. Compliance requirements for Title VI
- b. Strategies to achieve compliance with Title VI
- c. Implementation and documentation of the Title VI Implementation Plan
- d. Reporting strategies and methods

### 2. Development of an assistance packet of materials

- a. Sample policies and forms:
  - i. Provide sample complaint policies, forms and logs
  - ii. Nondiscrimination policies and statements, in languages other than English when appropriate
  - iii. Methods for collecting participant statistical data
  - iv. System for regular updates
- b. Sample notices and postings
  - i. Notice of nondiscrimination for the participation in the programs, services or benefits of the agency on the basis of race, color, national origin, age, sex or disability
  - ii. Identity of the Title VI Coordinator
  - iii. Posting requirements for Title VI information
- c. Limited English Proficiency Plan
  - i. Four factor analysis to help ensure meaningful access to an agency's programs by LEP persons
  - ii. Development of a formal language assistance program to include procedures for providing written translation and oral interpretation services

### 3. Ongoing and available assistance

Methods to provide ongoing assistance should be developed and assistance provided.

#### **4. Regular schedule of desk and onsite assessments to monitor compliance**

Assessments should be regularly scheduled to monitor compliance followed by a prescribed support system based on the results of the desk and onsite assessments. Compliant and noncompliant trends should be tracked, and the remediation methods reviewed to determine if the methods improved compliance. A long-term compliance, monitoring and training program should be developed and implemented.

#### **Conclusion**

While the majority of the responding agencies lack formal processes and procedures for full compliance with Title VI requirements for subrecipients of Federal-aid Highway funds, there is evidence of informal practices to ensure meaningful access for the program beneficiaries of many of the agencies reviewed.

Several responding agencies were able to provide notices and documents in languages other than English while responding that the agency does not have an implemented Title VI and LEP plan. Many agencies also provided a description of translation and interpreter services that are routinely provided to community members, while not having a formal language assistance plan.

The reviews also did not reveal policies or procedures that were found to have unintentional discriminatory text or directives. There were also very few records of complaints reported by any of the responding agencies that had been filed for alleged Title VI discrimination.

The largest benefit to the Caltrans subrecipient agencies would be training on the requirements to have formal written procedures for their nondiscrimination policies and practices, as well as guidance on the routine data collection and reporting obligations of subrecipient entities.

The Caltrans Division of Local Assistance will hereafter be responsible for follow up with subrecipient agencies to provide training and technical assistance regarding compliance with Title VI requirements.

## Appendix A – Caltrans District Map and List of Responding Agencies

Caltrans Districts are defined by inclusion of the agencies within the following Counties:

District 1	Del Norte, Humboldt, Lake and Mendocino
District 2	Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehama and Trinity
District 3	Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo and Yuba
District 4	Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma
District 5	Santa Barbara, San Luis Obispo, Monterey, San Benito and Santa Cruz
District 6	Fresno, Kern, Kings, Madera and Tulare
District 7	Los Angeles and Ventura
District 8	Riverside and San Bernardino
District 9	Inyo, Mono and Eastern Kern
District 10	Alpine, Amador, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus and Tuolumne
District 11	San Diego and Imperial
District 12	Orange



## Responding Agencies from Each District

The following is the list of the agencies that provided responses to the information request and is reported by District.

### District 1

Includes agencies within the Counties of Del Norte, Humboldt, Lake and Mendocino

- City of Crescent City
- County of Del Norte
- City of Fort Bragg
- City of Fortuna
- County of Lake
- City of Lakeport
- County of Mendocino

### District 2

Includes agencies within the Counties of Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehama and Trinity

- City of Alturas
- City of Anderson
- City of Dorris
- City of Portola
- City of Redding
- County of Siskiyou
- City of Tehama
- City of Yreka

### District 3

Includes agencies within the Counties of Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo and Yuba

- City of Chico
- City of Citrus Heights
- County of El Dorado
- City of Lincoln
- City of Placerville
- City of Rancho Cordova
- City of Roseville
- County of Sierra
- Tahoe Transportation District
- Town of Truckee
- County of Yolo

### District 4

Includes agencies within the Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma

- City of Antioch
- County of Contra Costa
- City of Cotati
- Town of Danville
- City of El Cerrito
- City of Healdsburg

- County of Marin
- City of Mill Valley
- City of Petaluma
- City of Pittsburg
- City of Pleasanton
- City of Redwood City
- City of Richmond
- City of San Carlos
- City of San Leandro
- City of San Rafael
- City of Santa Rosa
- County of Sonoma
- City of Vacaville
- Town of Windsor

#### **District 5**

Includes agencies within the Counties of Santa Barbara, San Luis Obispo, Monterey, San Benito and Santa Cruz

- City of Atascadero
- City of Monterey
- San Luis Obispo Council of Governments
- County of Santa Cruz
- City of Santa Maria

#### **District 6**

Includes agencies within the Counties of Fresno, Kern, Kings, Madera and Tulare

- City of Arvin
- City of Farmersville
- City of Firebaugh
- City of Fresno
- County of Fresno
- County of Kings
- City of Kingsburg
- City of Madera
- City of Taft
- City of Tulare
- County of Tulare

#### **District 7**

Includes agencies within the Counties of Los Angeles and Ventura

- City of Bellflower
- City of Beverly Hills
- City of Burbank
- City of Commerce
- City of Gardena
- City of Lancaster
- City of Los Angeles
- City of Monterey Park

- City of Oxnard
- City of Palmdale
- City of Pasadena
- City of San Buenaventura
- City of Simi Valley

#### **District 8**

Includes agencies within the Counties of Riverside and San Bernardino

- City of Chino Hills
- City of Corona
- City of Lake Elsinore
- City of Riverside
- County of San Bernardino
- City of Yucaipa
- Town of Yucca Valley

#### **District 9**

Includes agencies within the Counties of Inyo, Mono and Eastern Kern

- City of California City
- City of Ridgecrest
- City of Tehachapi

#### **District 10**

Includes agencies within the Counties of Alpine, Amador, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus and Tuolumne

- City of Livingston
- City of Merced
- County of Merced
- City of Plymouth
- City of Ripon
- City of Sonora
- County of Stanislaus
- City of Turlock

#### **District 11**

Includes agencies within the Counties of San Diego and Imperial

- City of Chula Vista
- City of El Cajon
- City of Encinitas
- City of Escondido
- City of San Diego
- San Diego Unified Port District
- City of San Marcos
- City of Santee
- City of Westmorland

#### **District 12**

Includes agencies within the County of Orange

- City of Newport Beach
- City of Placentia

## Appendix B – Matrix of Compliance by District

The following matrix summarizes the levels of compliance with Title VI requirements of responding agencies from each District. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from each District that were found to be at the indicated level compared to the other agencies within the same District.

To create the summary rating, a numeric value was assigned to the level of compliance for each agency within each District. The rating summarized the compilation of compliance levels by each agency that were compiled to provide an overall percentage level of compliance for all responding agencies for the entire District, with a percentage rating score out of a possible 100%.

### Level of Compliance Legend:

Compliant - items met compliance requirements

Partially Compliant - some met compliance

Not Compliant - did not meet compliance requirements or were not submitted

The areas of review represent a condensed version of the specific topic in the questionnaire. Depending upon the level of detail, the agency may be determined to be partially compliant (PC) for that specific area of review.

Numbers reported are percentages.

Area of Review	Level of Compliance			Summary Percentage
	Compliant	Partially Compliant	Not Compliant	
<b>District 1</b>				
Title VI Coordinator	57	0	43	57
Title VI Staff Training	14	0	86	14
Title VI Implementation Plan	0	29	71	14
Dissemination of Title VI Information	14	43	43	36
Complaint Procedure	29	29	43	43
Data Collection	0	43	57	21
LEP	14	0	86	14
<b>District 2</b>				
Title VI Coordinator	38	63	0	69
Title VI Staff Training	25	38	38	44
Title VI Implementation Plan	25	0	75	25
Dissemination of Title VI Information	25	25	50	38
Complaint Procedure	50	25	25	63
Data Collection	13	38	50	31
LEP	25	13	63	31
<b>District 3</b>				
Title VI Coordinator	36	55	9	64
Title VI Staff Training	9	45	45	32
Title VI Implementation Plan	36	18	45	45
Dissemination of Title VI Information	45	45	9	68
Complaint Procedure	36	55	9	64
Data Collection	18	27	55	32
LEP	45	18	36	55

<b>District 4</b>				
Title VI Coordinator	30	40	30	50
Title VI Staff Training	10	50	40	35
Title VI Implementation Plan	15	30	55	30
Dissemination of Title VI Information	25	35	40	43
Complaint Procedure	25	40	35	45
Data Collection	15	25	60	28
LEP	30	10	60	35
<b>District 5</b>				
Title VI Coordinator	60	40	0	80
Title VI Staff Training	0	80	20	40
Title VI Implementation Plan	60	20	20	70
Dissemination of Title VI Information	60	20	20	70
Complaint Procedure	40	60	0	70
Data Collection	20	80	0	60
LEP	60	20	20	70
<b>District 6</b>				
Title VI Coordinator	36	45	18	59
Title VI Staff Training	18	55	27	45
Title VI Implementation Plan	9	64	27	41
Dissemination of Title VI Information	45	27	27	59
Complaint Procedure	36	45	18	59
Data Collection	18	45	36	41
LEP	45	9	45	50
<b>District 7</b>				
Title VI Coordinator	31	54	15	58
Title VI Staff Training	23	54	23	50
Title VI Implementation Plan	31	46	23	54
Dissemination of Title VI Information	54	31	15	69
Complaint Procedure	31	54	15	58
Data Collection	31	31	38	46
LEP	62	0	38	62
<b>District 8</b>				
Title VI Coordinator	43	43	14	64
Title VI Staff Training	29	43	29	50
Title VI Implementation Plan	29	43	29	50
Dissemination of Title VI Information	29	57	14	57
Complaint Procedure	43	29	29	57
Data Collection	57	14	29	64
LEP	57	0	43	57
<b>District 9</b>				
Title VI Coordinator	0	67	33	22
Title VI Staff Training	0	67	33	22
Title VI Implementation Plan	67	33	0	56
Dissemination of Title VI Information	100	0	0	67
Complaint Procedure	67	33	0	56
Data Collection	33	67	0	44
LEP	100	0	0	67

<b>District 10</b>				
Title VI Coordinator	38	50	13	63
Title VI Staff Training	38	38	25	56
Title VI Implementation Plan	50	0	50	50
Dissemination of Title VI Information	25	50	25	50
Complaint Procedure	25	38	38	44
Data Collection	38	25	38	50
LEP	25	13	63	31
<b>District 11</b>				
Title VI Coordinator	33	56	11	61
Title VI Staff Training	22	56	22	50
Title VI Implementation Plan	22	11	67	28
Dissemination of Title VI Information	33	11	56	39
Complaint Procedure	44	22	33	56
Data Collection	0	67	33	33
LEP	22	33	44	39
<b>District 12</b>				
Title VI Coordinator	0	50	50	25
Title VI Staff Training	0	50	50	25
Title VI Implementation Plan	0	0	100	0
Dissemination of Title VI Information	0	0	100	0
Complaint Procedure	0	0	100	0
Data Collection	0	0	100	0
LEP	0	0	100	0

## Appendix C – Summary Matrix of All Districts

The following matrix summarizes the levels of compliance with Title VI requirements of responding agencies from all Districts. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from all Districts that were found to be at the indicated level.

To create the summary rating, a numeric value was assigned to the level of compliance for each agency. The rating summarizes the overall level of compliance for all responding agencies from all Districts, with a percentage rating score out of a possible 100%.

### Level of Compliance Legend:

Compliant - items met compliance requirements

Partially Compliant - some met compliance

Not Compliant - did not meet compliance requirements or were not submitted

Numbers reported are percentages.

Area of Review	Level of Compliance			Summary Percentage
	Compliant	Partially Compliant	Not Compliant	
<b>Summary of all Districts</b>				
Title VI Coordinator	33	47	20	56
Title VI Staff Training	16	48	37	39
Title VI Implementation Plan	29	24	47	39
Dissemination of Title VI Information	38	29	33	50
Complaint Procedure	36	36	29	51
Data Collection	20	38	41	38
LEP	41	10	50	43