



Staff Report

City Council

Item No. 3.E

Meeting Date: March 26, 2025

From: John A. Corella, Director of Public Works

Title: Adopt the Public Works Title VI Implementation Plan to Comply with Updated Caltrans Local Assistance Procedures Manual (LAPM) Requirements.

RECOMMENDATION:

To adopt the Public Works Department Title VI Implementation Plan in compliance with Caltrans Local Assistance Procedures (LAPM) requirements; appoint the Public Works Director as the Title VI Coordinator; and authorize the Public Works Director to execute the Public Works Nondiscrimination Policy Statement included in the Public Works Department Title VI Implementation Plan.

BACKGROUND:

Title VI of the Civil Rights Act of 1964 provides that no person in the United States 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. Title VI prohibits recipients of federal funding, either directly or through subcontracts, from these forms of discrimination.

In November 2024, the California Department of Transportation (Caltrans) issued Office Bulletin #24-06, which was subsequently incorporated into Chapter 9 of the Caltrans Local Assistance Procedures Manual (LAPM) in January 2025. The changes outlined in this bulletin reflect updated procedures and guidelines that are now integral to the processes described within the LAPM. Bulletin #24-06 is attached to this staff report.

The updates to LAPM Sections 9.1 and 9.2 are designed to assist local public agencies (LPAs) in better developing their Title VI Programs to ensure compliance with federal laws and regulations. These updates require LPAs to either develop or re-evaluate their Title VI program, providing clearer guidance on the necessary steps to achieve and maintain compliance. Additionally, the newly introduced Section 9.2.6 of the LAPM outlines the required documents and reports that LPAs must adhere to. One key requirement is the completion of the Title VI program assessment online form, which must be submitted biennially to ensure ongoing compliance.

DISCUSSION:

As a recipient of federal aid, the Public Works Department is required by Caltrans to develop and implement a program that clearly defines roles, responsibilities, and procedures to ensure compliance with Title VI and related statutes. This program guarantees that no individual is excluded from or denied the benefits of Public Works programs and activities based on race, color, national origin, or any other category protected by State or Federal law.

The Public Works Department Title VI implementation plan outlines the key components of the Title VI program and provides the necessary policy direction to ensure ongoing compliance with Title VI requirements.

Title VI Program Requirements:

- Develop a Title VI Implementation Plan, to be updated annually
 - Includes appointing a Title VI Coordinator
- Schedule Title VI Training for Public Works staff (required every 2 years)
- Update Title VI/Nondiscrimination Policy Statement annually
- Complete a Limited English Proficiency (LEP) Assessment annually
- Prepare a Language Access Plan (LAP)
- Implement public dissemination of Title VI Information
 - Public program website
 - Notices to the Public
- Develop Title VI Complaint Procedures
- Develop a Title VI Complaint Form
- Prepare a Title VI Accomplishment and Goals Report
- Submit the Title VI Program Assessment Online Form every two years

Further details on how the Public Works Department will implement the program requirements outlined above are included in the Public Works Department Title VI Implementation Plan, which is attached to this staff report. Additionally, a dedicated webpage on the Cathedral City website has been drafted and will be published upon the adoption of this Implementation Plan. The webpage will feature program details, including key information and contact details as specified in the Public Works Department Title VI Implementation Plan.

The Title VI Program Assessment Online Form must be submitted to Caltrans by March 31, 2025, in accordance with the updated timeline provided to the city by Caltrans Division of Local Assistance on January 24, 2025. The questions in this assessment are designed to assess compliance with Title VI and the Federal Highway Administration (FHWA)'s Title VI Program requirements, as outlined in the Code of Federal Regulations (23 CFR Part 200). Caltrans will utilize this assessment tool to evaluate the LPAs compliance with Title VI regulations. Successfully completing this assessment is essential to ensure compliance with FHWA regulations and maintain eligibility for federal funding.

The City of Cathedral City has established a Title VI compliance policy under Section 204 of the Personnel Rules Handbook. This policy includes guidelines for complaint procedures, training requirements, policies and procedures, and necessary documentation. While these anti-discrimination and anti-harassment policies align substantially with the Public Works Title VI Implementation Plan and Program outlined in this staff report, the Public Works Department proposes adopting a department-specific Title VI Implementation Plan and

formal Public Works Title VI Program. This proposal aims to better align with the enhanced requirements set by Caltrans and the Federal Highway Administration (FHWA), ensuring continued eligibility for federal funding for department-specific programs and activities.

Staff is recommending that City Council adopt the Public Works Department Title VI Implementation Plan in compliance with Caltrans LAPM requirements; appoint the Public Works Director as the Title VI Coordinator; and authorize the Public Works Director to execute the Public Works Nondiscrimination Policy Statement included in the Public Works Department Title VI Implementation Plan.

FISCAL IMPACT:

There is no fiscal impact associated with the adoption of the Public Works Title VI Implementation Plan or the development of a formal Public Works Title VI Program. The adoption of this Plan and Program ensures compliance with Caltrans requirements and maintains eligibility for federal funding for Public Works programs and activities.

FIVE-YEAR STRATEGIC PLAN:

Goal A: Serve the Community with Pride and Dedication

Objective: Through diversity, equity, and inclusion driven employee programs and experiences, Cathedral City is the employer of choice with a workforce that is engaged, motivated, and respected public stewards.

ATTACHMENTS:

- 1- Caltrans Office Bulletin 24-06
- 2- Public Works Department Title VI Implementation Plan