

Mendocino County Department of Transportation

Title VI Implementation Plan

2025



Table of Contents

Table of Contents 1

Introduction..... 1

Title VI Coordinator 3

Title VI / Non-Discrimination Policy 4

Limited English Proficiency Plan 4

Four Factor Analysis..... 6

Language Assistance Plan..... 7

Monitoring and Updating..... 7

Dissemination of Title VI Information 7

Title VI Training for Staff..... 7

Title VI Assurances in Contract Documents and Agreements 7

Title VI Complaint Procedures 7

Title VI Data Collection.....13

Internal / External Title VI Reviews 13

Title VI Accomplishments and Goals Report / Title VI Annual Work Plan14

Appendix A. Limited English Proficiency Census Data15

Appendix B. Training Material.....18

Appendix C. Title VI Assurances in Contract Documents and Agreements20

Appendix D. Complaint Form21

Appendix E. Data Collection29

Appendix F. Annual Work Plan.....36

Introduction

This plan is part of Mendocino County Department of Transportation's (MCDOT) continual and ongoing effort to comply with civil rights regulations. This document communicates the County's intent to proactively meet and exceed minimum compliance requirements established under Title VI of the Civil Rights Act of 1964 (Title VI), 49 CFR § 26, and the related anti-discrimination statutes and regulations purported by Federal Highway Administration (FHWA) pursuant to their grants. Mendocino County strives to provide continued transparency, clarity, and technical guidance for internal and external constituents regarding its Title VI program.

Title VI Coordinator

The Title VI Coordinator and ADA Coordinator work together to oversee the coordination of Mendocino County's compliance with Title VI and Section 504 statutes, regulations, and directives. These coordinators report directly to the County Commissioners. Responsibilities include, but are not limited to:

- Implementing Mendocino County's Title VI and Americans with Disability Act (ADA) Transition Plans
- Assisting with the development of processes and procedures for the investigation of complaints filed under Title VI and ADA
- Coordinating Title VI and ADA program development with Title VI/ADA Liaisons
- Preparing required reports as necessary
- Participating in the design, development, and dissemination of Title VI and ADA information to the public; and

Mendocino County's ADA Comprehensive Access Plan and ADA Transition Plan are posted to the County Web site at <https://www.mendocinocounty.gov/government/human-resources/ada-compliance>.

Title VI/ADA Liaisons

This interdisciplinary team is composed of staff trained in the Caltrans Federal Aid Series. They are responsible for the following:

- Ensure compliance with Title VI and related nondiscrimination laws
- Remove programmatic and architectural barriers from programs and activities in accordance with relevant nondiscrimination laws
- Ensure meaningful access to County services and programs to minorities, persons with limited English proficiencies and low-income persons; and
- Provide input in the development and review of the Title VI and ADA implementation plans

Coordinator & Liaison Contact Information

All concerns should be directed to the Title VI or ADA Coordinator; however, any MCDOT assisting the public can use the plan and disseminate forms or take information for contact by appropriate staff.

Howard Dashiell
Director of Transportation
MCDOT Title VI Coordinator
340 Lake Mendocino Drive
Ukiah, CA 95482
(707) 463-4363

Cherie Johnson
Director of Human Resources
County ADA Coordinator
501 Low Gap Road, Room 1010
Ukiah, California 95482
(707) 234-6600

Title VI / Non-Discrimination Policy

Mendocino County Department of Transportation (MCDOT) values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this county. As a recipient of federal funds, MCDOT is required to conform to Title VI and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the DOT on the grounds of race, color, age, sex, disability, national origin, or income status.

MCDOT will implement compliance with Title VI 49 CFR § 26; and its related statutes and regulations to ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation (DOT) on the grounds of race, color, or national origin.



Howard Dashiell

Mendocino County Department of Transportation
Director of Transportation

Limited English Proficiency Plan

Background

On August 11, 2000, President William J. Clinton signed an executive order, *Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency*, to clarify Title VI of the Civil Rights Act of 1964. It requires that Federal agencies work to ensure that the recipients of Federal financial assistance provide meaningful access to their Limited English Proficiency (LEP) applicants and beneficiaries

Per Executive Order 13166, agencies which receive Federal funding must examine their Federally-funded services and develop and implement processes that will allow LEP persons to meaningfully access said services. Executive Order 13166 also requires that agencies receiving Federal funding must establish guidance for providing meaningful access to LEPs, prepare a plan to overcome language barriers in Federally-funded programs and activities, and ensure that stakeholders have adequate opportunity to provide input.

As such, local agencies are required to ensure that Federally-funded programs and activities normally provided in English are accessible to LEP Persons. Each local agency shall perform an annual assessment to determine if modifications are needed to their programs and activities to ensure meaningful access by LEP persons. The assessment which is referred to as a “Four-Factor” analysis is based on the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered.
2. The frequency of LEP contacts.
3. The nature and importance of the programs, services, or activities provided by Mendocino County Department of Transportation.
4. The resources available for LEP persons.

Four-Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to be encountered.

As shown in Table 1 below, Mendocino County has approximately 85,822 residents. 7,067 (8.2%) of residents in Mendocino County are considered as a part of the LEP population, with the majority of those LEP persons primarily speaking Spanish (6,067, 85.8% of the LEP community). Other Indo-European Languages account for 250 people, 8.2% of LEP persons, and Asian and Pacific Island Languages account for 745 people, 10.5% of the LEP community.

DOT has adopted Department of Justice’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. *“The ‘Safe Harbor Provision’ as defined by Department of Justice, stipulates that if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”* All language groups other than Spanish have estimated populations of less than 1,000 persons and 5% of the

total population. There are no languages that may approach the Safe Harbor Provision threshold in the foreseeable future. A further breakdown of languages spoken at home is included in Appendix A.

Table 1. Summary of Languages Spoken at Home for the Population 5 Years and Over from the 2023: ACS 5-Year Estimates (C16001). Source:

<https://data.census.gov/table/ACSDT5Y2023.C16001?t=Language+Spoken+at+Home&g=050XX00US06045>

Language Spoken	Group Population	Group's Percentage of Total Population	Portion of Group that Speak English "Very Well" (% of Group Population)	Portion of Group that Speak English Less Than "Very Well" (% of Group Population)
English Only	67,313	78.4 %	-	-
Spanish	15,785	18.4 %	9718 (61.6 %)	6067 (38.4 %)
Other Indo-European Languages	1,192	1.4 %	942 (79.0 %)	250 (21.0 %)
Asian and Pacific Island Languages	1,370	1.6 %	642 (45.6 %)	745 (54.4 %)
Other Languages	162	0.2 %	157 (96.9 %)	5 (3.0 %)
Total Other than English	18,509	21.6 %	11,442 (61.8 %)	7,067 (38.2 %)
Total	85,822	-	11,442 (13.3 %)	7,067 (8.2 %)

2. The frequency of LEP contacts.

According to Census data, the largest concentration of LEP individuals in Mendocino County is Spanish speaking. MCDOT staff does not regularly receive requests for translation through Federally funded programs/projects, though the outreach components of said programs/projects do typically have multi-lingual resources. Further, if translation services are needed, staff will provide said translation in a timely manner.

Category	Statistic
Estimated number of translation and interpretation services provided	26
Number of tele-interpret services provided	0
Number of languages interpreted to English	1

3. The nature and importance of programs, services, or activities provided by MCDOT.

All activities and programs are likely to affect some LEP individuals in Mendocino County.

4. The Resources Available for LEP persons.

MCDOT has assessed its available resources that could be used for providing LEP assistance. Interpretation and translation services in Spanish are available through certified staff. Language interpretation may be available for other languages in cooperation with other county resources and organizations such as the City of Ten Thousand Buddhas. More complex professional interpretation or translation services may be done on an as-needed basis.

Results

As of the 2023 census data, 7,067 (8.2%) of residents in Mendocino County are considered as a part of the LEP population, with the majority of those LEP persons primarily speaking Spanish (6,067, 85.8% of the LEP community). Approximately 26 translation and interpretation services were utilized. It was found that the only translation services requested were in Spanish and were able to be addressed by qualified staff. In order to address the needs seen and given the number of requests and the current resources available, MCDOT will strive to update necessary documents into Spanish. A procedure to document the LEP contacts will be developed. A more detailed overview of future goals is identified in Appendix F.

Language Assistance Plan

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to MCDOT's services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

In order to ensure compliance with Title VI, and Executive Order 13166, MCDOT will strive to offer the following measures:

Language Assistance Measures

- Non-Discrimination Policy Statement shall be printed in English and Spanish. Said statement will be posted in MCDOT lobby in a highly visible location.
- Title VI Rights Poster shall be printed in English and Spanish. Said posters will be posted in MCDOT lobby in a highly visible location, and additional copies will be available for the public to review and take.
- Title VI Complaint Form shall be in MCDOT lobby in a highly visible location.
- I Speak Cards - I Speak Cards will be produced to easily identify translation services needed for English and Spanish. Said cards will be placed at all public counters and with the other Title VI information.
- Title VI Webpage on County's Website - All of the County's Title VI resources will be posted on the County's website at the following link:
<https://www.mendocinocounty.gov/departments/transportation>
- Future Planning and Projects

- Public Works will ensure that all future projects and planning documents that are federally-funded utilize outreach methods that are compliant with Title VI and other related non-discriminatory assurances.
- Additionally, MCDOT will ensure that outreach materials are available in English and Spanish, and that translators are readily available as necessary for any LEP Persons that would like to contribute or participate.
- LEP Documentation - All MCDOT staff will fill out a form to document their experience concerning any contact with LEP persons.
- MCDOT staff will take reasonable steps to provide the opportunity for meaningful access to LEP individuals who have difficulty communicating in English.
- The Title VI Specialist will request an updated list of certified translators every six months and distribute said list to those who are likely to encounter LEP persons, such that a translator can be contacted the moment one is needed.
- The following resources will be available to accommodate LEP persons:
 - If an individual is a Spanish-speaker, interpretation and translation services are available through staff.
 - Language interpretation may be available for other languages in cooperation with Mendocino County Social Services and organizations such as the City of Ten Thousand Buddhas.

Monitoring and Updating

MCDOT's Language Assistance Plan is designed to be easily updated. At a minimum, MCDOT will follow the Title VI Program update schedule of submission every 3 years.

Each update of the LEP Plan will examine plan components including, but not limited to:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether MCDOT fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of Title VI Information

MCDOT will include the LEP Plan along with the Title VI Program on their website (<https://www.mendocinocounty.gov/departments/transportation/>). Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the Limited English Proficiency Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Title VI Training for Staff

MCDOT staff has and will continue to be trained annually on the following:

- Information on the Title VI policy and LEP responsibilities.
- The policy and procedures for interaction with LEP persons.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a Title VI/LEP complaint.

Training material and roster of most recent training are included in Appendix B.

Title VI Assurances in Contract Documents and Agreements

These are standard U.S. DOT assurances that outline the County’s guarantee for compliance with Title VI of the Civil Rights Act of 1964 as a recipient of federal financial assistance. The executed assurances are included in the following pages taken from the most current language of the Caltrans Local Assistance Procedures Manual (LAPM) and incorporated into all MCDOT federal participating consultant and construction contract agreements.

Title VI Assurances in Contract Documents and Agreements are included in Appendix C.

Title VI Complaint Procedures

Any person who believes that he or she has been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Mendocino County Department of Transportation (MCDOT) service, program, or activity whether federally funded or not, based on their race, color, national origin, gender, age, disability, religion, ancestry, income status, or Limited English Proficiency may file a complaint. A complainant’s representative may also file a complaint on the behalf of such a person.

It is the policy of MCDOT to conduct a prompt and impartial investigation of all allegations of discrimination and to take prompt effective corrective action when a claim of discrimination is substantiated.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because they have taken action or participated in an action to secure rights protected by the civil rights laws. Any individual alleging such harassment or intimidation may submit a complaint by following the procedure printed below.

Any individual who feels that he or she has been discriminated against may submit a written or verbal complaint. The complaint may be communicated to any department head or to the County

Title VI or ADA Coordinator. Title VI complaints should be submitted within 180 days of the alleged discrimination. ADA complaints should be filed within 60 days after alleged violation. ADA Complaint forms may be found on the County website or at MCDOT. Title VI Complaint forms may be found at MCDOT. Individuals are not required to use the County's complaint form. If necessary, the County will help an individual reduce his or her complaint to writing for his or her signature.

Generally, a complaint should include the name, address and telephone number of the complainant and a brief description of the alleged discriminatory conduct including the date of harm. An individual submitting a complaint alleging discrimination may include any relevant evidence, including the names of witnesses and supporting documentation.

Within 60 days of the receipt of the complaint the County will conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant. The County will try to obtain an informal voluntary resolution to all complaints at the lowest level possible.

A complainant's identity shall be kept confidential except to the extent necessary to conduct an investigation. All complaints shall be kept confidential.

These procedures do not deny the right of any individual to file a formal complaint with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination.

Should we receive, and vet, a complaint we would notify – within no longer than 60 days - Caltrans Local Assistance, County Counsel and County Human Resources while following the process below:

Complaint Process

MCDOT will promptly investigate all properly submitted complaints of alleged discrimination. MCDOT will also attempt to resolve such complaints and take corrective action upon a finding of a substantiated complaint. MCDOT's Complaint Form may be found in Appendix D.

Complaint Investigation Procedures

The Title VI and ADA Coordinators will make a determination to accept, reject, or refer to the appropriate agency a complaint within seven working days of its receipt. MCDOT will determine whether the person or entity purportedly engaged in the alleged discriminatory act as a sub-recipient of federal funds. If the complaint does not specifically mention that the alleged discriminatory actor is a sub-recipient of federal funds, MCDOT may presume so in deciding whether to accept the complaint for further processing.

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and its related statutes, regulations, and directives; the Americans with Disability Act of 1990, as amended; and Section 504 of the Vocational Rehabilitation Act of 1973. These procedures do not affect the right of the Complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are

part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the Complainant. MCDOT will make every effort to facilitate a voluntary early resolution of complaints at the lowest level possible. The County may exercise the option of informal resolution at any stage of the process.

Who May File a Complaint

Any person who believes that he or she has been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any MCDOT service, program, or activity whether federally funded or not, based on their race, color, national origin, gender, age, disability, religion, ancestry, income status, or Limited English Proficiency may file a complaint. A complainant's representative may also file a complaint on the behalf of such a person.

Timeliness of Complaints

For a Title VI complaint to be considered timely, it must be filed within 180 calendar days after the alleged incident has occurred – ADA complaints must be filed within 60 days. The file date of a complaint is the earlier of the postmark or date received by Mendocino County.

Location/Availability of Complaint Forms

MCDOT will make complaint forms available front counter, and sent with all property acquisition packages, and requirements included in all federal contract provisions either “Federal Super Circular” or most current standard language from the Caltrans “Local Assistance Procedures Manual” (LAPM). Additionally, persons may contact the Title VI or ADA Coordinator to request a copy of the complaint form via email, facsimile, or United States mail. Copies of complaint forms in alternative formats are available upon request.

How to File a Complaint

A complainant may file his or her complaint by mail, facsimile, or email. Any person with a disability may request to file his or her complaint using an alternative format. MCDOT will acknowledge complaints received by fax or email and will process them once the County establishes the identity of the complainant. Complainants must mail a signed, original copy of the fax or email transmittal to the County to begin the complaint process. MCDOT does not require a complainant to use the County complaint form for submitting his or her complaint.

Direct Title VI Complaints to:
Howard Dashiell, County Engineer
MCDOT Title VI Coordinator
340 Lake Mendocino Drive
Ukiah, CA 95482
(707) 463-4363

Direct ADA Complaints to:
Cherie Johnson, Director Human Resources
County ADA Coordinator
501 Low Gap Road, Room 1010
Ukiah, California 95482
(707) 234-6600

Elements of a Complete Complaint

A complete complaint is written and signed. Verbal complaints must be reduced to writing and provided to the complainant for confirmation, review, and signature before processing. The complaint form is available in the appendix of this report and on the county website.

Additionally, a complete complaint is filed within 180 calendar days of the alleged discriminatory act(s) and includes at minimum the following information:

The full name and address of the complainant

The full name and address of the respondent, the individual, agency, department, or program that allegedly discriminated against complainant; and description of the alleged discriminatory act(s) that violated the Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, national origin, sex, age, or disability) and the date of occurrence.

The following items are not acceptable as a complete complaint:

- Anonymous complaints
- Inquiries seeking advice or information
- Newspaper articles
- Courtesy copies of court pleadings
- Courtesy copies of complaints addressed to other agencies
- Courtesy copies of internal grievances
- Oral complaints

The Title VI or ADA coordinator shall notify the complainant in writing if his or her complaint is incomplete and allot 15 calendar days for the complainant to respond and provide the supplemental information needed to complete the complaint.

Processing Complaints

The Title VI and ADA Coordinator will process all complaints and will:

- Maintain a log of all complaints
- Acknowledge receipt of a complaint and inform the complainant of the action taken or proposed action to be taken to process the complaint
- Inform respondent of allegations and request a position statement and response to all aspects of the complainant's allegations
- Coordinate investigation and assign a staff member to the case
- Contact the complainant at the conclusion of the investigation

Corrective Action

If MCDOT recommends corrective action, the County will give the respondent 30 calendar days to inform the County of the actions taken for compliance. The Title VI or ADA coordinator shall monitor the respondent's corrective action compliance.

Corrective action may include actions that the respondent will complete at a future date of the initial 30 days and must include project time in which the respondent will complete the action.

If the respondent has not taken the recommended corrective action within the 30-day period allowed, MCDOT will for the respondent to be in noncompliance with Title VI and its

implementing regulations. Noncompliance not corrected by informal means as described above may be subject to sanctions as per 49 CFR § 21.13.

Pre-Investigative/Administrative Closures

It is the general practice of MCDOT to investigate all complete complaints; however, the County may administratively close a complaint at its discretion.

The types of complaints that may be administratively closed and will not be investigated include, but are not limited to, the following:

- Complaints that fail to state a claim or provide any substantial or coherent claim
- Complaints that are outside the scope of Mendocino County's Title VI jurisdiction
- Untimely complaints filed more than 180 days after the alleged discriminatory acts
- Complaints voluntarily withdrawn by the complainant
- Complaints in which the investigation has been impaired by the County's ability to locate the complainant
- Complaints that are a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients that repeatedly have been found factually or legally unsubstantiated by Mendocino County
- Complaints containing the same allegations and issues that have been addressed in a recently closed complaint or compliance review conducted by the County
- Complaints containing allegations that are foreclosed by previous decisions by the Federal courts, Department of Justice, or County policy determinations
- Complaints filed for complainants or parties who refuse to cooperate with the investigation and whose lack of cooperation substantially impairs the completion of the investigation
- Complaints transferred to another agency for investigation; and
- Complaints where the death of a complainant makes it impossible to investigate the allegations fully MCDOT shall notify complainant in writing when a determination is made to administratively close a case without further investigation. The notification shall include an explanation of the basis for administrative close.

Confidentiality

MCDOT shall keep all complainants' identities confidential except to the extent necessary for carrying out an investigation. If an investigator determines that it is necessary to disclose the complainant's identity to the responder or a third party, the investigator must first obtain complainant's written permission.

Records

MCDOT shall maintain all records of an investigation in a confidential area for three years after the completion of the investigation.

Summary of Complaints Received

No complaints have been filed at the time of this plan.

Title VI Data Collection

Demographic and related data collected and used by County staff comes from governmental sources responsible for collecting and vetting the information for consistency and accuracy. These sources include, but are not limited to, 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, and the California Employment Development Department.

Additionally, staff may also collect project-specific demographic data utilizing data collection as appropriate through the public outreach process on Federally-funded projects. Such outreach that may give Staff the opportunity to collect demographic data may include door hangers, posters, emails, social media releases, press releases to local newspaper, public meetings, virtual meetings, and public comment through websites generated for projects.

Example surveys are attached in Appendix E.

Documenting Interactions with LEP Persons

When MCDOT staff interacts with a LEP person, they must document the encounter using the LEP Documentation Form. This will help the MCDOT track which languages may be needed in the future to assist LEP clients.

LEP Policy and Documentation Form is attached in Appendix E.

Internal / External Title VI Reviews

Internal Title VI Reviews

In order to insure the MCDOT's Title VI Compliance, at a minimum, MCDOT will follow the Title VI Program update schedule of submission every 3 years.

Each update of the Implementation Plan, MCDOT will examine plan components and MCDOT's compliance including, but not limited to:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Determine whether MCDOT fully complies with the goals of this Implementation Plan.
- MCDOT will collect and analyze demographic data to ensure nondiscrimination and assess the effectiveness of outreach methods.
- Process and investigate complaints against subrecipients.
- Conduct annual reviews and updates to the Title VI plan and procedures.

External Title VI Reviews

MCDOT is currently in the process of developing a process and procedure for external review.

Title VI Accomplishments and Goals Report / Title VI Annual Work Plan

The Mendocino County Department of Transportation will annually establish and monitor program goals and accomplishments. The Title VI Coordinator will ensure that employee training is conducted, language translation services continue to be available, public participation is optimal, and appropriate Title VI signage is posted. This also includes updating community statistics and corresponding with state and federal agencies as necessary.

The current annual work plan is included in Appendix F.

Appendix A.
Limited English Proficiency Census Data

Table: ACSDT5Y2023.C16001

	Mendocino County, California	
Label	Estimate	Margin of Error
Total:	85,822	±78
Speak only English	67,313	±1,069
Spanish:	15,785	±925
Speak English "very well"	9,718	±723
Speak English less than "very well"	6,067	±740
French, Haitian, or Cajun:	321	±126
Speak English "very well"	268	±122
Speak English less than "very well"	53	±51
German or other West Germanic languages:	202	±137
Speak English "very well"	202	±137
Speak English less than "very well"	0	±32
Russian, Polish, or other Slavic languages:	99	±76
Speak English "very well"	65	±73
Speak English less than "very well"	34	±40
Other Indo-European languages:	570	±281
Speak English "very well"	407	±222
Speak English less than "very well"	163	±121
Korean:	46	±51
Speak English "very well"	14	±23
Speak English less than "very well"	32	±51
Chinese (incl. Mandarin, Cantonese):	583	±249

Table: ACSDT5Y2023.C16001

	Mendocino County, California	
Label	Estimate	Margin of Error
Speak English "very well"	209	±114
Speak English less than "very well"	374	±210
Vietnamese:	235	±172
Speak English "very well"	63	±62
Speak English less than "very well"	172	±129
Tagalog (incl. Filipino):	275	±142
Speak English "very well"	238	±131
Speak English less than "very well"	37	±49
Other Asian and Pacific Island languages:	231	±111
Speak English "very well"	101	±83
Speak English less than "very well"	130	±71
Arabic:	22	±33
Speak English "very well"	20	±33
Speak English less than "very well"	2	±4
Other and unspecified languages:	140	±93
Speak English "very well"	137	±93
Speak English less than "very well"	3	±5

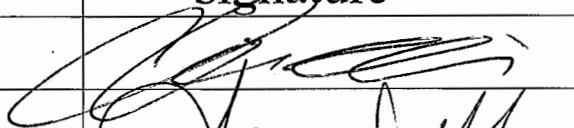
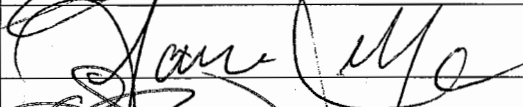
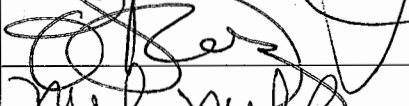

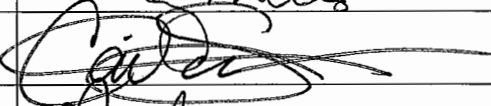
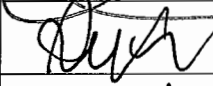
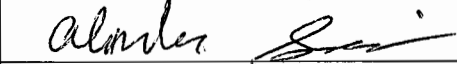
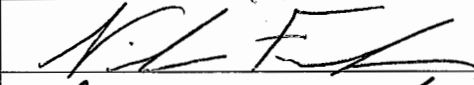
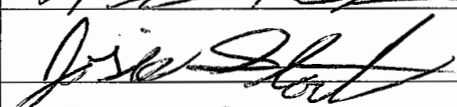

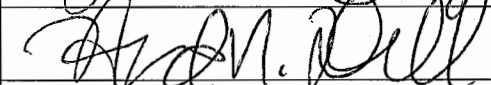
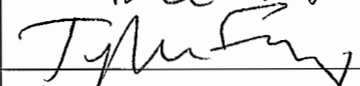
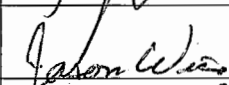

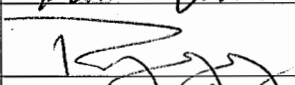
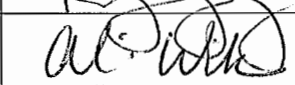
Appendix B. Training Material

See Other Attachment for Training Material

• Mendocino County Department of Transportation

Title VI Training

3/31/2025

Name	Signature
CHRIS GIALDINI	
APRIN GORDON	
Edith Fuentes-Ruiz	
Melany Mello	
Caitlin Schafer	
Sebastian Rolfe	
Alexander Sequeira	
Nicole French	
Josie Slout	
Jannaliese Blundell	
Howard N. Dashiell	
TYLER FRANZ	
Jason Wise	
James Linderman	
RIGG LARSEN	
ALICIA WINOKUR	

Appendix C.

Title VI Assurances in Contract Documents and Agreements

See Other Attachment

Appendix D.
Complaint Form

NON-DISCRIMINATION - TITLE VI COMPLAINT FORM PROCEDURE

The purpose of this form is to help any person interested in filing a discrimination complaint with Mendocino County. You are not required to use this form. You may write a letter with the same information, sign it, and return it to the address below. All bold items must be completed for your complaint to be investigated. Failure to provide complete information may impair the investigation of your complaint.

Title VI of the Civil Rights Act of 1964, as amended and its related statutes and regulations (Title VI) prohibit discrimination on the basis of race, color, national origin, sex, age, disability/handicap, or income status in connection with programs or activities receiving federal financial assistance for the United States Department of Transportation, Federal Highway Administration, and/or Federal Transit Administration. These prohibitions extend to MCDOT as a sub-recipient of federal financial assistance.

Upon request, assistance will be provided if you are an individual with a disability or have limited English proficiency. Complaints may also be filed using alternative formats such as computer disk, audiotape, or Braille.

You also have the right to file a complaint with other state or federal agencies that provide federal financial assistance to Mendocino County. Additionally, you have the right to seek private counsel.

MCDOT is prohibited from retaliating against any individual because he or she opposed an unlawful policy or practice, filed charges, testified, or participated in any complaint action under Title VI or other nondiscrimination authorities.

Please make a copy of your complaint form for your personal records. Do not send your original documents as they will not be returned. Mail the original complaint form along with any copies of documents or records relevant to your complaint to the address below.

Title VI Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

****Your complaint cannot be processed without your signature.**

Direct Title VI Complaints to:

Howard Dashiell, County Engineer
MCDOT Title VI Coordinator
340 Lake Mendocino Drive
Ukiah, CA 95482
dashielh@mendocinocounty.gov
(707) 463-4363
FAX (707) 463-5474

Available in alternative format upon request

Non-Discrimination - Title VI Complaint Form

COMPLAINANT INFORMATION		
Name <i>(first, middle, last)</i>		
Address <i>(number and street, city, state, ZIP code)</i>		
Home telephone number () -	Work telephone number () -	Cellular telephone number () -

PERSON / DEPARTMENT YOU BELIEVE DISCRIMINATED AGAINST YOU		
Name <i>(first, middle, last)</i>	Title	
Name of department		
Address <i>(number and street, city, state, ZIP code)</i>		
Home telephone number () -	Work telephone number () -	Cellular telephone number () -
When was the last alleged discriminatory act? <i>(month, day, year)</i>		
Complaints of discrimination must be filed within 180 days of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.		
The alleged discrimination was based on:		
Race	Color	Age
Disability	Ancestry	Retaliation
		Gender
		Religious Affiliation
		National Origin

Describe the alleged act(s) of discrimination. *(Use additional pages, if necessary)*

--

Provide the names of any individuals with additional information regarding your complaint:

Name of witness 1 <i>(first, middle, last)</i>		Title
Name of company		
Address <i>(number and street, city, state, ZIP code)</i>		
Home telephone number () -	Work telephone number () -	Cellular telephone number () -
Include a brief description of the relevant information the witness may provide to support your complain of discrimination:		

Name of witness 2 (<i>first, middle, last</i>)		Title
Name of company		
Address (<i>number and street, city, state, ZIP code</i>)		
Home telephone number () -	Work telephone number () -	Cellular telephone number () -
Include a brief description of the relevant information the witness may provide to support your complain of discrimination:		

Name of witness 3 (<i>first, middle, last</i>)		Title
Name of company		
Address (<i>number and street, city, state, ZIP code</i>)		
Home telephone number () -	Work telephone number () -	Cellular telephone number () -
Include a brief description of the relevant information the witness may provide to support your complain of discrimination:		

COUNTY OF MENDOCINO
ADA Complaint Resolution Procedure

It is Mendocino County's intent to accommodate participation in County government by citizens with disabilities and to reasonably accommodate employees who are disabled. This Complaint Resolution Procedure is established to meet the requirements of the Americans with Disabilities Act (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability with regard to employment practices and policies or the provision of services, activities, programs, or benefits by the County of Mendocino.

Procedure Steps

- Step 1. **Submit an ADA Complaint Resolution Form.** The grievant and/or his/her designee should fill out an ADA Complaint Resolution Form as soon as possible, but no later than sixty (60) calendar days after the alleged violation. To pick up and submit a form, contact the Human Resources Department at 501 Low Gap Road – Room 1326, Ukiah, and telephone (707) 234-6600, or access it on the County's website at www.mendocinocounty.org/hr/ada.
- Step 2. **Initial County Response to Complaint.** As soon as possible, but not later than thirty (30) calendar days after receipt of a complaint, the ADA Coordinator or a designee will meet with the complainant to discuss the complaint and possible resolution(s). Follow up meetings may also be put in place to clarify concerns and/or discuss possible accommodation. Within thirty (30) calendar days after the last meeting, the ADA Coordinator will respond in writing and, where appropriate, in a format accessible to the complainant (for example, large print Braille or audiotape). The response will explain the position of the County of Mendocino and offer appropriate options for substantive resolution of the complaint.
- Step 3. **Appeal of County Response.** If the response from the ADA Coordinator or designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may, within fifteen (15) calendar days after the receipt of the response, appeal the decision of the ADA Coordinator to the Chief Executive Officer or his/her designee.
- Step 4. **County Response to Appeal.** Within fifteen (15) calendar days after receipt of the appeal, the Chief Executive Officer or his/her designee will meet with the complainant to discuss the complaint and possible resolution(s).
- Step 5. **Resolution.** Within fifteen (15) calendar days after the meeting, the Chief Executive Officer or his/her designee will respond in writing and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. If the ADA complaint is not resolved by the above internal process, the complainant will be referred to the appropriate federal agency for assistance.

All written complaints received by the ADA Coordinator, appeals to the Chief Executive Officer or his/her designee, and responses from the ADA Coordinator and the County Administrative Officer and his/her designee will be kept on file with the County of Mendocino Human Resources Department for a period not less than three (3) years.

COUNTY OF MENDOCINO
ADA Complaint Resolution Form

This form is to be used by employees and members of the public to request that the County of Mendocino provide an accommodation to a disability. For example, such a reasonable accommodation would assist a member of the public to participate in County Government or to receive services or, in the case of an employee, enable the employee to perform essential job functions.

I. CONTACT INFORMATION

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Phone Number: _____ TDD Number: _____
E-mail: _____

Name, address, and telephone number of representative filing this complaint on complainant's behalf:

II. DESCRIPTION OF COMPLAINT

Date of event: _____ Time of event: _____

Location of event: _____

Describe the complaint:

Name(s) of alleged offender(s): _____

Name(s) of witnesses, if any: _____

Describe desired remedy/remedies:

Submitted by: (signature)

Date

Received by: (signature)

Date

Submit your completed form to Mendocino County Human Resources Department located at 501 Low Gap Road, Room 1326, Ukiah, CA 95482, or by email to hr@mendocinocounty.org

Appendix E.
Data Collection
and LEP
Procedure

Caltrans Public Participation Survey

Participating Agency: Mendocino County Department of Transportation

The following information is being collected by the California Department of Transportation (Caltrans) in order to comply with Title VI of the Civil Rights Act of 1964, *Nondiscrimination in Federally Assisted Programs*. Please take a few moments to complete the following questions. The data you provide will enable Caltrans to identify residents and communities impacted by federally funded projects/or activities. Please check the appropriate boxes with an "X" that best describes you and return the completed survey to the event coordinator. Submittal of this information is *voluntary*.

Sex

Male Female

Ethnicity

Hispanic or Latino Not Hispanic or Latino

Race

- American Indian or Alaska Native
- Black or African American
- Native Hawaiian or other Pacific Islander
- Asian
- White
- Other: _____

Disability

Yes No

Age

Under 40 Over 40

Income

- \$22,050 or Less
- Over \$22,051

Language

What language is primarily spoken in your household? _____

Categories and Definitions

The minimum categories for data on race and ethnicity for federal statistics, program administrative reporting, and civil rights compliance reporting are defined as follows:

- a. **American Indian or Alaska Native:** A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
- b. **Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- c. **Black or African American:** A person having origins in any of the black racial groups of Africa.
- d. **Hispanic or Latino:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- e. **Native Hawaiian or other Pacific Islander:** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- f. **White:** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Caltrans Encuesta de Participación Pública

Agencia participante: Mendocino County Department of Transportation

La siguiente información está siendo recopilada por el Departamento de Transporte de California (Caltrans) con el fin de cumplir con el Título VI del Acta de Derechos Civiles de 1964, No discriminación en los programas de asistencia federal. Por favor tómese unos minutos para completar las siguientes preguntas. Los datos que proporcione permitirá Caltrans para identificar los residentes y las comunidades afectadas por los proyectos financiados por el gobierno federal / o actividades. Por favor, marque las casillas correspondientes wiht una "X" que mejor te describes y devuelva la encuesta completada a la coordinadora del evento. La presentación de esta información es voluntario.

Sexo

Hombre Mujer

Etnicidad

Hispano or Latino No Hispano or Latino

Raza

- Indio Americano o Nativo de Alaska
- Americano Negro o Africano
- Hawaiano Nativo o otra Isla del Pacifico
- Asiático
- Blanco
- Otro: _____

Discapacidad

Sí No

Edad

Menos de 40 Más de 40

Ingresos

- \$22.050 o Menos
- Más de \$22.051

Idioma

¿Qué idioma se habla principalmente en su hogar? _____

Categorías y Definiciones

Las categorías mínimas para datos de raza y origen étnico de las estadísticas federales, informes administrativos del programa, y los informes de cumplimiento de los derechos civiles se definen como sigue:

- a. **Indio Americano o Nativo de Alaska:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Norte y Sudamérica (incluyendo América Central), y que mantiene una afiliación tribal o de comunidad.
- b. **Asiático:** Una persona que tiene orígenes en cualquiera de los pueblos originales del Lejano Oriente, Sureste de Asia o el subcontinente indio, incluyendo, por ejemplo, Camboya, China, India, Japón, Corea, Malasia, Pakistán, las Filipinas, Tailandia y Vietnam.
- c. **Americano Negro o Africano:** Una persona que tiene orígenes en cualquiera de los grupos raciales negros de África.
- d. **Hispano or Latino:** Una persona de origen Cubano, Mexicano, Puertorriqueño, Centro o Sudamericano o de otra cultura u origen Español, sin importar la raza.
- e. **Hawaiano Nativo o otra Isla del Pacífico:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Hawai, Guam, Samoa u otras Islas del Pacífico.
- f. **Blanco:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Europa, el Medio Oriente o África del Norte.

POLICY AND PROCEDURES FOR INTERACTIONS WITH LEP PERSONS

POLICY:

Mendocino County Department of Transportation (MCDOT) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of MCDOT is to ensure meaningful communication with LEP clients and their representatives. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff and arrangements with local organizations providing interpretation or translation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

Mendocino County Department of Transportation will promptly attempt to identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (the "I Speak" cards). In addition, when records are kept of past interactions with clients the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTERPRETER

MCDOT staff is responsible for maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual resources (including staff). Staff is also responsible for contacting the appropriate bilingual resource to interpret, in the event that an interpreter is needed;

If the LEP person's native language is not English, and a qualified staff interpreter is not available, contact the Mendocino County Social Services for available resources. If no resources are available, document the interaction so that resources for the particular language will be available in the future.

3. DOCUMENTING INTERACTIONS WITH LEP PERSONS

When MCDOT staff interacts with a LEP person, they must document the encounter using the LEP Documentation Form. This will help the MCDOT track which languages may be needed in the future to assist LEP clients.

LEP DOCUMENTATION FORM

Date of Contact: _____

Location of Contact: _____

Name of staff member filling out form: _____

Indicate language of LEP person: SPANISH Other: _____

How were the LEP language needs met? _____

Please describe the nature of the LEP person's visit:

Were their needs met by the end of the visit? Yes No

Appendix F.
Annual Work Plan

Mendocino County Department of Transportation
Title VI Accomplishments and Goals Report
Annual Work Plan for Federal Fiscal Year 2024-2025



Date: March 31, 2025

I. Introduction

The Mendocino County Department of Transportation (MCDOT) is dedicated to awareness, eliminating discrimination, and increasing inclusion of all customers in the transportation system. This Title VI Goals & Accomplishments Report documents MCDOT’s progress in Title VI compliance. This report highlights all of the accomplishments that MCDOT has achieved in the area of Title VI during the 2024-2025 Federal Fiscal Year (FFY), as of March 31, 2025, and the Goals section of the report explains what MCDOT plans to accomplish in the upcoming 2025-26 Federal Fiscal Year in relation to the Department’s Title VI program.

II. Title VI Data

a. Title VI Trainings

Title VI Training has been conducted for the MCDOT Engineering & Environmental, Land Improvement (LI), and Administration staff. Other MCDOT staff will receive Title VI training later this fiscal year. Applicable Engineering, including Environmental, staff will receive any Title VI and Labor Compliance trainings offered by Caltrans and/or FHWA as they are available.

	Title	Date	Attendees	Audience
1.	Title VI Mandated Training	3/31/2025	16	Engineering, Land Imp., Admin staff
2.	Title VI Mandated Training	Ongoing	63	All MCDOT staff
3.	Caltrans Title VI Training	As available	TBD	Engineering
4.	Caltrans Labor Compliance Training	As available	TBD	Engineering

b. Limited English Proficiency (LEP)

The following table depicts MCDOT’s LEP Data for FFY 2024/25 as of 3/31/2025.

Category	Statistic
Percentage of population that does not speak English proficiently	8.2%
Percentage of LEP persons primarily speaking Spanish	85.8%
Estimated number of interpretation services provided (Spanish)	30
Estimated number of translation services provided (Spanish)	10
Number of tele-interpreter services provided	0
Number of languages interpreted to English	1

c. Complaints

No complaints have been filed during FFY 2024/25 as of 3/31/2025.

III. Organization Structure

The Title VI Coordinator and ADA Coordinator work together to oversee the coordination of Mendocino County’s compliance with Title VI and Section 504 statutes, regulations, and directives. These coordinators report directly to the County Commissioners.

IV. Accomplishments for FFY 24/25 from 10/1/25 – 3/31/25

- Performed internal Title VI Review, verifying MCDOT was in compliance with all Title VI requirements
- Developed Title VI Implementation Plan and LEP Analysis
- Updated procedure for processing interpretation and interpretation requests
- Updated Title VI Complaint Procedure and Log
- Reviewed Complaint Log for previous year
- Verified Title VI brochures are available in the public lobby
- Verified Title VI posters are posted in the public lobby
- Posted Title VI information on website
- Conducted Title VI training for MCDOT Engineering, Environmental, Administration, and Land Improvement staff
- Updated procedure for Title VI data collection and analysis
- Updated procedure for External Title VI Review
- Verified Title VI assurances were included in all construction contracts and consultant agreements

V. Goals for FFY 24/25 from 4/1/25 – 9/30/25

- Update Annual Work Plan for FFY 2024/25
- Perform Title VI External Reviews
- Annual training for all MCDOT staff
- Develop log of interpretation and translation services and track LEP services
- Send applicable staff to any Title VI and Labor Compliance trainings offered by Caltrans and/or FHWA
- Review Complaint Log for entire year
- Perform Internal Title VI Review
- Ensure new staff are given Title VI Training
- Ensured outreach materials for projects were available in English and Spanish
- Verify clauses from Appendix B to Exhibit B of Caltrans LAPM Exhibit 4-C is included in any and all deeds effecting or recording the transfer of PROJECT real proepert
- During Construction pre-job meetings, Labor Compliance staff reviewed Title VI requirements with contractors
- Translate all applicable Title VI documents to Spanish
- Translate to Spanish and make available additional documents within the Department that may be utilized by LEP's

VI. Goals for FFY 25/26

- Perform Title VI External Reviews
- Annual training for all MCDOT staff
- Send applicable staff to any Title VI and Labor Compliance trainings offered by Caltrans and/or FHWA
- Review Complaint Log for previous year

- Perform Internal Title VI Review
- Ensure new staff are given Title VI Training
- Translate all applicable Title VI documents to Spanish
- Translate to Spanish and make available additional documents within the Department that may be utilized by LEP's