Plumas County
Department of Public Works
Title VI and Nondiscrimination Plan

Adopted by the Plumas County Board of Supervisors

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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" (42 U.S.C. Section 2000d).

In addition to the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964, the Nondiscrimination Statutes and Authorities set forth in Appendix F (Appendix E - USA DOT Order 1050.2A) are also incorporated as part of this plan.

Every Plumas County Public Works employee and every person engaged in business with the Department of Public Works, have an on-going responsibility to create a nondiscriminatory work environment through their personal conduct.

This plan was developed to guide the Department of Public Works in its administration and management of Title VI-related activities.

Title VI Coordinator contact information:
Robert A. Perreault, Jr. - Title VI Coordinator
Plumas County Department of Public Works
1834 E. Main Street, Quincy CA 95971
Phone Number: (530) 283-6268
Email: bobperreault@countyofplumas.com

Title VI Information Dissemination
Title VI information shall be disseminated as set forth in this plan.

Notice to Public

Plumas County Department of Public Works Title VI notice to the public is included in this Plan as Appendix A. This notice informs members of the public of the protections against discrimination afforded to them by Title VI.

This notice is not required to be translated into non-English languages as the number of individuals within the jurisdiction who speak English "less than very well" are below the Safe Harbor Provision.

Plumas County's Title VI notices are provided at the following locations:

- ✓ The Plumas County Public Works Website
- ✓ The reception area of Public Works Headquarters Building

Complaint Procedure

The procedure for filing a complaint regarding discrimination on the basis of race, color, or national origin, or any of the provisions contained within Appendix F, is included in this plan as Appendix B. The Title VI Complaint Procedure will accompany the Title VI Complaint Form included in this plan as Appendix C. The complaint procedure and form are available at the following locations:

- ✓ The Plumas County Public Works Website
- ✓ The reception area of Public Works Headquarters Building

There have been no investigations, complaints or lawsuits filed since the filing of the last Title VI compliance report. (Appendix D)

Public Participation Plan

The Plumas County Department of Public Works acknowledges the importance of a public participation process that reaches out to as many population demographics as possible, including Plumas County's Limited English Proficiency (LEP) populations. The Public Participation Plan (PPP) provides a set of goals and strategies designed to engage all members of the public regardless of gender, race, color, ancestry, religion, national origin, ethnicity, age, disability, sexual orientation, marital status, medical condition, or any other category protected by state or federal law.

The PPP is included in this report as Appendix E.

Limited English Proficiency (LEP) Plan

Four Factor Analysis

In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

(1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the activities or programs of the Department of Public Works.

(2) The frequency with which LEP persons come into contact with the activities or programs.

(3) The nature and importance of the Department of Public Works activities or programs to people's lives.

(4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

FACTOR #1 – Number or proportion of LEP persons eligible to be served or likely to be served by the Plumas County Department of Public Works

The service area of Plumas County Public Works is the geographical boundary of Plumas County. No services are provided to individuals located outside of Plumas County.

The 2010 Census estimates Plumas County's population to be 20,007. The population of individuals who speak English less than "very well" is 248*. The break-down by language of these individuals is as follows:

Language	Population	% of Plumas County Population
Spanish	**193**	**0.96%**
Other Indo-European languages	**45**	**0.22%**
Asian and Pacific Islander languages	**10**	**<0.05%**

*Information obtain from 2013-2017 American Community Survey 5-Year Estimates

FACTOR #2 - The frequency with which LEP persons come into contact with Plumas County Department of Public Works activities or programs.

Plumas County's limited LEP population has not engaged in interactions with the Plumas County Department of Public Works to any significant degree.

There are no LEP communities in Plumas County. The limited LEP population is not centralized within any of Plumas County's communities.

The literacy skills of the various LEP populations are unknown, so it is uncertain whether translation of transit information or Title VI procedure and complaint forms would be effective.

Based on interview surveys of Public Works staff, including Headquarters reception staff, district supervisors and district maintenance workers, information regarding the use of various programs and activities has been able to be effectively communicated to the Spanish speaking LEP population. There have been no encounters with any of the other LEP populations.

FACTOR #3 - The nature and importance of the services to people's lives provided by the Department of Public Works.

The Department of Public Works maintains and constructs transportation infrastructure and provides updates on the condition and accessibility of County roadways. This information is important to the public utilizing the County's transportation infrastructure.

FACTOR #4 - The resources available for LEP outreach, as well as the costs associated with that outreach

The Public Works Department has one Spanish-speaking employee who is available to assist individuals with questions regarding various Department of Public Works activities and programs. No other resources are currently available to assist the LEP populations within the County.

Safe Harbor Provision

The Safe Harbor Provision 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 affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Plumas County's LEP population does not approach the thresholds established in the "Safe Harbor Provision".

Language Assistance Services

The Department of Public works employs a Spanish-speaking employee who is available to assist individuals with questions or complaints. A phone number will be provided that will provide access to this service. Notice of this language assistance service will be posted at the following locations:

- ✓ The Plumas County Public Works Website
- ✓ The reception area of Public Works Headquarters Building

Monitoring, Evaluation, and Updating of the LEP Plan

The LEP plan will be evaluated bi-yearly or as feedback or complaints are received. The LEP plan will be updated as needed.

Language Assistance Training

The Spanish speaking translator will be advised to respond to language assistance requests as soon as possible. In addition to providing the requested information, the translator will request feedback from the customer as to how the Department of Public Works can provide better information to the LEP population.

Notifying the Public of Rights under Title VI

Plumas County Department of Public Works

- The Plumas County Department of Public Works operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act, or any other nondiscrimination policy set forth in the Plumas County Department of Public Works Title VI and Nondiscrimination Plan. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under this plan may file a complaint with the Plumas County Department of Public Works.

- For more information on Plumas County Department of Public Works civil rights program/nondiscrimination plan, and the procedures to file a complaint, contact the Plumas County Department of Public Works at 530-283-6268; email pcpw@countyofplumas.com; or visit the Public Works Headquarters at 1834 East Main Street, Quincy, CA 95971. For more information visit the Department of public Works Webpage at http://www.countyofplumas.com

- A complainant may file a complaint directly with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Plumas County Public Works
Title VI Complaint Procedure

Any person who believes she or he has been discriminated against by the Plumas County Department of Public Works on the basis of race, color, or national origin, or any other nondiscrimination policy set forth in the Plumas County Department of Public Works Title VI Nondiscrimination Plan, may file a complaint by completing and submitting the agency's Title VI/Non Discrimination Complaint Form to the Title VI Coordinator at the following address:

Robert A. Perreault Jr., Director
Plumas County Department of Public Works
1834 East Main Street
Quincy, CA 95971
Phone Number: (530) 283-6268
Email: bobperreault@countyofplumas.com

The Title VI Coordinator will investigate complaints received no more than 180 days after the alleged incident. The Department of Public Works will process complaints that are complete.

Once the complaint is received, it will be reviewed to determine if it is within the Plumas County Public Works Department's jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated.

The Title VI Coordinator has 30 days to investigate the complaint. If more information is needed to resolve the case, the complainant will be contacted by letter. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the case may be administratively closed. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI or Nondiscrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and will indicate that appropriate disciplinary action and training will be implemented, If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Plumas County Department of Public Works
Title VI Nondiscrimination Complaint Form

Section I

Name:_____

Address:_____

Telephone Numbers: (Home)_____(Work)_____

Electronic Mail Address:_____

Accessible Format Requirements: Large Print _____ Audio tape _____ TDD _____

Other_____

Section II

Are you filing this complaint on your own behalf? Yes ____ No ____

[If you answered "yes" to this question, go to Section III.]
If not, please supply the name and relationship of the person for whom you are complaining:

_____

Please explain why you have filed for a third party.

_____

_____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes ____ No ____

Section III

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race [ ] Color [ ] National Origin [ ] Other: _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

_____

_____

Section IV

Have you previously filed a Title VI complaint with any other Federal, State or local agency, or with any Federal of State Court? Yes____ No____

If yes, check all that apply:

[ ] Federal Agency:_____

[ ] Federal Court:_____ [ ] State Agency:_____

[ ] State Court:_____ [ ] Local Agency:_____

Please provide information about the contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____ Agency: _____

Address:_____

Telephone Number:_____

Section V

Name of Agency complaint is against: _____

Contact Person: _____Title: _____

Telephone Number: _____

You may attach any written materials or other information that you believe is relevant to your complaint.

Signature and date required below:

_____ _____

Signature Date

Please submit this form to the Title VI Coordinator in person at the address below, or mail form to:

Robert A. Perreault Jr., Title VI Coordinator
Plumas County Department of Public Works
1834 East Main Street
Quincy, CA 95971

Plumas County Department of Public Works

List of Title VI/Nondiscrimination Plan

Investigations, Complaints and Lawsuits

	Date (Month, Day, Year)	**Summary** (Include basis of complaint: race, color, or national origin)	**Status**	**Action(s) Taken**
Investigations				
1.	None received			
Lawsuits				
1.	None received			
Complaints				
1.	None received			
2.				

Plumas County Department of Public Works
Public Participation Plan

The Plumas County Department of Public Works (PCDPW) acknowledges the importance of a public participation process that reaches out to as many population demographics as possible. This plan provides a set of goals and strategies designed to achieve that end.

PUBLIC PARTICIPATION GOALS & STRATEGIES

Goal 1: Provide all interested parties and agencies reasonable opportunities for involvement in the transportation planning process

Strategy 1.1
Provide adequate public notice of public participation opportunities and activities and time for public review of regionally significant plans and documents.

Strategy 1.2
Evaluate plans, programs, and projects to determine the most appropriate and effective tools and strategies for public and agency involvement and outreach.

Strategy 1.3
Provide the opportunity to comment on draft planning documents to affected federal, state, and local agencies.

Strategy 1.4
Make information available for viewing on the PCDPW website. Regionally significant documents shall also be made available at key locations throughout the county, such as libraries and other public gathering places.

Strategy 1.5
In developing draft planning documents, the PCDPW will consult with federal, state, local agencies, and officials that may be affected by proposed plans or projects.

Strategy 1.6
Prior to adoption, provide opportunity for public and agency review and comment, as appropriate.

Strategy 1.7
During the planning process, PCDPW and its advisory bodies shall conduct open public meetings in accordance with the Brown Act (CGC Sec. 54950 et seq).

Goal 2: Increase public awareness and understanding of the planning process in Plumas County.

Strategy 2.1
Provide information on regionally significant plans and projects to the local media for inclusion in their publications.

Strategy 2.2
Maintain the PCDPW website with current planning activities, including reports and plans, as well as agendas and minutes for stakeholder and community meetings.

Strategy 2.3

When appropriate, present information about specific plans and projects at public forums, such as City Council and Board of Supervisors meetings for increased public and governmental awareness.

Goal 3: Ensure accessibility to the planning process and information for all members of the community.

Strategy 3.1

Hold public meetings at locations that are convenient and accessible to the public.

Strategy 3.2

Select meeting locations for community outreach activities with priority to locations that are accessible by means of public transportation.

Strategy 3.3

Make planning documents available for viewing on the PCDPW website. Regionally significant documents shall also be made available at key locations throughout the County.

Strategy 3.4

Make every effort to accommodate requests for accessibility opportunities, including physical accessibility to public meetings as well as accessibility to information.

Goal 4: Maintain contact with interested individuals and agencies throughout the process of developing plans and projects.

Strategy 4.1

Encourage early involvement in the planning process by providing timely notification and access to information regarding the development of plans and projects.

Strategy 4.2

Utilize citizen and agency advisory groups as a means of providing input to the planning process.

Strategy 4.3

Maintain a contact list of agencies and individuals that may be interested in a specific project or plan.

Strategy 4.4

Identify key individuals and organizations, including small community organizations that may be interested in or affected by a plan or program.

Goal 5: Increase opportunities for those traditionally under-served, including the elderly, students, low income, disabled, and minority households, to participate in the planning process.

Strategy 5.1

Offer key information, as appropriate, such as notices and announcements, in alternative languages when appropriate or requested.

Strategy 5.2

Provide the opportunity for alternative forms of public input (website, email, etc.) for individuals who are unable to be physically present at public meetings or workshops.

Strategy 5.3

Advertise the availability of an interpreter when appropriate or requested.

Goal 6: Consider public and agency input and comments as an integral part of PCDPW's decision making process.

Strategy 6.1

Utilize citizen and agency advisory groups as a means of providing input to the planning process.

Strategy 6.2

Conduct public opinion surveys to help identify the needs, interests, and concerns of the population when appropriate.

Strategy 6.3

Consider the input of federal, state, and local agencies during the decision making process.

Strategy 6.4

As appropriate, incorporate concerns, issues, and suggestions of the public and agencies when developing plans and projects.

Goal 7: Consult with tribal governments within Plumas County and provide opportunities for tribal government input into the planning process.

Strategy 7.1

Provide early notice of the development of plans and programs to all tribal governments within Plumas County.

Strategy 7.2

Provide the opportunity for direct consultation with tribal councils and/or administrators as part of the planning process.

PUBLIC PARTICIPATION TOOLS

Contact Lists/Direct mailing: PCDPW staff will maintain a mailing list of interested persons who desire to be kept informed about the progress of various planning documents.

Public Notices: When posting notices for public meetings, a notice shall be posted at the County Courthouse, Public Works office and local newspaper. All notices of public meetings or hearings will include date, time, and place of public meeting/hearing, and a general description of the matter to be considered.

Public Hearings: Public hearings will be held, as appropriate, prior to the adoption of planning documents. Public hearings will be held prior to a decision point as a formal means to gather citizen comments and positions from all interested parties for public record and input into the decision making process.

News Releases: If requested, the PCDPW will provide news releases to provide public information and insight about PCDPW plans, programs, or projects.

Posters and Flyers: When feasible, flyers and/or posters will be used to encourage involvement of the under-served and transit-dependent citizens.

Other Relevant Public Involvement Measures: The PCDPW will continue to comply with all State and Federal requirements regarding public participation, including those not explicitly provided for in this document. The PCDPW will periodically review the public involvement procedures and implementation measures relative to their effectiveness in assuring that the process provides full and open access to all citizens of Plumas County. When needed, the public involvement procedures will be updated or revised.

APPENDIX F

(Appendix E of the Title VI Assurances US DOT Order 1050.2A)

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following nondiscrimination statutes and authorities; including but not limited to:

Pertinent Nondiscrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 U.S.C. § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, subrecipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;

- The Federal Aviation Administration's Nondiscrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).