



SAN GABRIEL VALLEY COUNCIL OF
GOVERNMENTS

TITLE VI IMPLEMENTATION PLAN

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1.0 POLICY STATEMENT

The following statement will be updated annually and disseminated through the San Gabriel Valley Council of Governments' website in English, Spanish, and Chinese:

The San Gabriel Valley Council of Governments, under Title VI of the Civil Rights Act of 1964, ensures “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.”

The San Gabriel Valley Council of Governments (SGVCOG) affirms its commitment to complying with Title VI requirements ensuring equitable access to all programs, activities, and services. This policy applies to all employees, contractors, consultants, and sub-recipients of federal funds.

The SGVCOG will comply with Title VI requirements for all programs and services delivered to the public. This implementation plan serves as a guide and a reflection of commitment to preserving civil rights for all individual group beneficiaries of Agency programs and services.

Title VI Coordinator Contact Information

Manager of Administrative Services

Admin@sgvcog.org

(626) 457-1800

Marisa Creter

03/31/2025

Marisa Creter
Executive Director
San Gabriel Valley Council of Governments

Date

2.0 INTRODUCTION

The San Gabriel Valley Council of Governments (SGVCOG) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program, service, or activity receiving federal financial assistance on the grounds of race, color, or national origin as required by Title VI of the Civil Rights Act of 1964. This plan outlines the Agency’s policies, procedures, and responsibilities to comply with Title VI regulations.

This implementation plan provides a general overview of how the SGVCOG will comply with Title VI, including but not limited to:

- Handling a Title VI complaint
- Engaging in public participation
- Providing services to Limited English Proficiency populations
- Training employees and managers in how to provide services and administer programs in compliance with Title VI

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy. Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d and related statutes, and the requirement of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21. This plan will be updated accordingly annually by October 1.

3.0 TITLE VI RESPONSIBILITIES

The Executive Director is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all Agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The Title VI Coordinator is responsible for implementing, monitoring, and ensuring compliance with Title VI regulations. The position of **Administrative Services Manager** is the designated Title VI Coordinator. The Title VI Coordinator works within the Administration department. The identification of this Title VI Coordinator will be disseminated to the public through the Agency website.

3.1 Title VI Implementation Assignments

Title VI Coordinator

The Title VI Coordinator is responsible for:

- Ensuring the Title VI program is current with all requirements set forth by the Federal Highway Administration (FHWA), California Department of Transportation (Caltrans), and any other applicable jurisdictions.
- Preparing and coordinating Title VI Plan and Annual Report submission.
- Developing Title VI information for dissemination to the public.
- Developing and coordinating Title VI training for managers, supervisors and staff with public contracts, on a two-year minimum basis.
- Ensuring that Title VI Assurances have been incorporated into all Federally funded Contracts and Agreements.
- Working with contractors, public stakeholders and other relevant parties to ensure that Title VI protections are maintained.

- Developing complaint procedures, complaint logs, and ensuring that all applicable staff are properly trained in the complaint reporting procedures.
- Reporting complaints through the SGVCOG complaint procedures.

Assistant Title VI Coordinator

The Assistant Title VI Coordinator is responsible for:

- Assuming the role and responsibilities of Title VI Coordinator in their absence.
- Working with Title VI Specialist to ensure program compliance is met.
- Ensuring that all applicable staff are present for Title VI training.

4.0 TITLE VI NOTICE TO THE PUBLIC

SGVCOG posts a Title VI notice to inform the public of their rights under Title VI. The notice is available in multiple languages and is posted in visible locations, including:

- SGVCOG office
- SGVCOG website (www.sgvkog.org)

5.0 COMPLAINT PROCEDURES

Individuals who believe they have been subjected to unlawful discriminatory practice under Title VI have the right to file a formal complaint. Any such complaint must be filed in writing with the SGVCOG Title VI Coordinator within 180 days following the date of the alleged discriminatory action.

Complaint forms are available at the SGVCOG office and online. Examples of the complaint form are included under Appendix B. Complaints must be filed in writing and should be directed at:

San Gabriel Valley Council of Governments
Administrative Services Department – Title VI Coordinator
1333 S. Mayflower Avenue, 360
Monrovia, CA. 91016
Website: <https://www.sgvkog.org/titlevi>

Complainants should be advised that complaints may also be submitted to an external Federal agency, such as the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). However, should a complaint be filed with SGVCOG and the Federal agency simultaneously, the Federal complaint will supersede the SGVCOG complaint and the internal complaint procedures will be suspended pending the Federal agency's findings. Every effort will be made to obtain a timely resolution of complaints.

5.1 Complaint Submission and Intake

Once a Title VI complaint is submitted, SGVCOG must follow a structured process to ensure compliance with federal and state regulations. The process includes intake, review, investigation (if applicable), resolution, and appeal options. The SGVCOG will adhere to the following complaint procedures:

1. **Receiving the Complaint** – Complaints must be submitted in writing using the SGVCOG

Title VI Complaint Form and include the following information:

- a. The date of the alleged act of discrimination, date when the complainant became aware of the alleged discrimination, date on which the conduct was discontinued, and the latest instance of conduct.
 - b. A detailed description of the issues, including names and job titles of those individuals perceived as parties to the discriminatory activity.
 - c. Signature of the complainant. In cases where a complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The investigator assigned will interview the complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or their representative.
2. **Acknowledgment of Complaint Receipt** – The Title VI Coordinator will acknowledge receipt of the complaint in writing within 10 business days. The acknowledgement will include an explanation of the next steps, justification review, and expected timelines.
3. **Jurisdiction Review and Determination** – The Title VI Coordinator will determine if SGVCOG has jurisdiction over the complaint by assessing:
- a. Whether the complaint alleges discrimination based on race, color, or national origin in a federally funded program, service or activity.
 - b. Whether the program, service, or activity is funded with federal financial assistance.
 - c. Whether the alleged discriminatory act involves the Agency, a sub-recipient, or a contractor under the Agency’s oversight.
 - d. Whether the location of the program falls within the Agency’s service area and scope of authority.
 - e. Whether the Agency has legal or contractual responsibility to oversee or address the matter.
4. **Non-Jurisdiction Referrals** – If the SGVCOG does **NOT** have jurisdiction, the complaint will be referred to the appropriate agency within 15 business days (e.g. Caltrans’ Office of Civil Rights, FHWA, or FTA), and the complainant will be notified in writing.
5. **Jurisdiction Investigations** – If the SGVCOG does have jurisdiction, then the complaint moves to the investigation phase.

5.1 Title VI Complaints Filed Under the FHWA

A person may also file a complaint directly with the FHWA and/or Caltrans with the following contact information:

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

California Department of Transportation Office of Civil Rights
Attention: Title VI Program Branch 1823 14th Street, MS 79
Sacramento, CA 95811

Title.VI@dot.ca.gov

6.0 PUBLIC PARTICIPATION PLAN

The San Gabriel Valley Council of Governments is committed to ensuring the public has opportunities to be involved in decisions affecting programs, services, and projects. The Agency recognizes that effective public participation is essential to equitable decision-making and ensuring that all populations, including minority, low-income, and Limited English Proficiency (LEP) communities, have meaningful access to the planning process. The SGVCOG has prepared a Public Participation Plan (PPP) to promote public involvement in the planning and decision-making process of projects, programs and services. The PPP is included under Appendix C.

7.0 LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Table: Languages spoke in the San Gabriel Valley

Language Spoken	Group Population	Group's % of the Population	Portion that speaks English very well	Portion that does not speak English very well
English only	549,184	37.16%	549,184 100%	0 0.00%
Spanish	509,631	34.49%	333,776 65.49%	175,855 34.51%
Other Indo-European Languages	27,324	1.85%	20,667 75.64%	6,657 24.36%
Asian and Pacific Island Languages	381,419	25.81%	152,984 40.11%	228,435 59.89%
Other Languages	10,161	0.69%	6,654 65.49%	3,507 34.51%
Total Population Over 5 Years	1,477,719	100%	1,063,265 71.95%	414,545 28.05%

Source for Tables: US Census: American Community Survey 2023 5-Year Estimate

<https://data.census.gov/table/ACSST5Y2023.S1601?g=060XX00US0603790810.0603793200.0603793510>

7.1 Limited English Proficiency

A Limited English Proficiency (LEP) person is a person that does not speak English as a primary language and has a limited ability to read, write, or comprehend English. Per Executive Order 13166 (Subject to the Effect of Executive Order 14224, "Designating English as the Official Language of the United States" issued on March 01, 2025), agencies which receive Federal funding must examine their Federally funded services and develop and implement processes that will allow LEP individuals 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 shown in the Table above, 28.05% of the San Gabriel Valley are considered LEP persons, with the majority of those LEP primarily speaking Spanish (34.49% of the community) and Asian and Pacific Island Languages (25.81% of the community). As outlined in the SGVCOG LEP Plan (Appendix D), the Agency has conducted a LEP Needs Assessment, using a Four Factor Analysis to identify need and provide access to the LEP community in compliance with Executive Order 13166.

7.2 Title VI Information Dissemination

To ensure that Title VI and related Civil Rights information is readily available to the public, SGVCOG will disseminate the Notice of Rights (Appendix E) through its website at <https://www.sgvco.org/titlevi>. The languages selected for the informational materials were based upon language data provided from the US Census; see Table above.

7.3 Environmental Justice

In accordance with Executive Order 12898 (Subject to the Effect of Executive Order 14148, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity" issued on January 21, 2025), SGVCOG staff will identify and address the environmental effects of programs, policies, and activities on minority and low-income populations for Federally funded projects. Staff will consider demographic data during project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public's input and demographic data analysis will enable staff to develop measures to mitigate any potential adverse effects on minority and low-income populations.

8.0 DATA COLLECTION AND ANALYSIS

8.1 Data Collection Procedures

Demographic and related data collected and used by SGVCOG 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 Statistics, 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.

8.2 Contract Documents and Agreements

The Agency's Title VI Coordinator will ensure that any Federally funded project documents contain the necessary Title VI Assurances and other languages. Such assurances include, but may not be limited to:

FHWA Form 1273 and 1391

The [FHWA Form 1273](#) is required to be included in all FHWA contracts and subcontracts of \$10,000 or more and allows the enforcement of Title VI and other non-discrimination requirements. The Agency will ensure that any contract or subcontract that is signed includes this form.

The [FHWA Form 1391](#) will be completed by the prime contractor during the last full pay period in July for all federal-aid construction contracts that are active.

Exhibit 4-C: Master Agreement

In receiving funds from FHWA, the Agency assures the full execution of the Master Agreement Administering Agency-State Agreement for Federal-Aid Projects, also known as [Exhibit 4-C](#), ensuring the compliance with Title VI. The DLAE will ensure the Agency signs the most current

version.

Exhibit 4-D: Program Supplement Agreement

The Agency assures that each project with federal funds from FHWA will include the in the Program Supplement Agreement a reaffirmation of the nondiscrimination assurances contained in the Master Agreement, as seen in [Exhibit 4-D](#).

Appendix A-E

The Agency will insert [Appendix A-E](#) (Appendix G) to each project contract with federal funds from FHWA. The Agency will continue to utilize the "Local Agency Construction Contract Administration Checklist" (Exhibit 15-A of the LAPM), which confirms that DBE and labor/Equal Employment Opportunity (EEO) compliance requirements are performed and documented in project files. Exhibit 15-A of the LAPM documents that the local Agency will meet all the requirements prior to the award of a construction contract.

The Agency will continue to utilize the "Resident Engineer’s Construction Contract Administration Checklist" (Exhibit 15-B of the LAPM) on federal-aid projects. The checklist assists in administering federal-aid highway construction projects and provides a record that the EEO/Wage Rate/False Statements posters are being posted at specific locations that employee interviews will be conducted in accordance with the Labor Compliance/EEO interview form, and that DBE requirements are met. SGVCOG staff will continue to submit Exhibit 15-B, along with the Award Package shortly after the award of a construction contract.

9.0 TITLE VI TRAINING AND COMPLIANCE MONITORING

9.1 Training

The SGVCOG will provide Title VI and related statute training to Agency managers, supervisors, and staff with frequent public contact in the administration of federal-aid programs. Training will occur at a minimum every two years, and within six months of hiring a new employee. Training will be conducted by the Title VI Coordinator, online through presentations, or through training hosted by Caltrans.

In particular, the following items will be covered in the Title VI training:

- Review of SGVCOG Title VI Implementation Plan and other relevant documents
- Language assistance services and “I Speak Cards” offered for public use
- How to handle potential complaints
- Where to seek assistance for Title VI questions and concerns

9.2 Annual Work Plan Monitoring

The Agency 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 coordinator will develop an annual Title VI Accomplishments and Goals Report which consists of accomplishments for the past year, and goals for the next year. This report will be

made available to the public upon request.

Appendix A - Notice to the Public

Your Rights Under Title VI of the Civil Rights Act of 1964

The SGVCOG is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity sponsored or implemented by the San Gabriel Valley Council of Governments on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

Any person who believes they have been discriminated against should contact:

Title VI Coordinator
Administrative Services Department
1333 South Mayflower Avenue, Monrovia, 91016

Telephone: (626) 457-1800
Email: Admin@SGVCOG.org

Appendix B - Complaint Form

SGVCOG is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits or be subjected to discrimination under any program or activity on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

Title VI complaints must be filed within 180 days of the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact us (626) 457-1800.

Name:	Date of Incident:
Phone:	Email:
Your Street Address, City, State & Zip Code:	
Name(s) of person(s) discriminated against (other than complainant):	
Street Address, City, State & Zip Code (other than complainant):	

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

Title VI:

- Race
 Color
 National Origin

Other Non-Discrimination Protected Categories:

- Age
 Disability
 Sexual Orientation
 Gender
 Gender Identity
 Other

Date(s) that the alleged event(s) took place:

Location(s) where the alleged event(s) took place:

Please describe the alleged discrimination incident. Provide the names and titles of all employees involved, if known. Explain what happened and whom you believe is responsible. Please attach additional pages if required.

Is the alleged discrimination still ongoing?

Please list any person(s) we may contact for additional information on your complaint:

Have you filed this complaint with any other Federal agency, State agency, Federal or State court? If yes, check all that apply:

- Federal Agency Federal Court State Agency State Court

Please provide the name, phone number, and email address of the contact person at the agency/court where the complaint was filed:

By signing below, I confirm that the information on this form is true to the best of my knowledge.

Complainant Name

Complainant Signature

Date

Return this completed form to:
San Gabriel Valley Council of Governments
Title VI Coordinator
Administrative Services Department
1333 South Mayflower Avenue, Suite 360
Monrovia, CA 91016
Email: Admin@SGVCOG.org

Appendix C - Public Participation Plan (PPP)

As a recipient of Federal funding, SGVCOG adheres to Title VI of the Civil Rights Act of 19647 and has integrated this Public Participation Plan into its Title VI Program. This plan provides guidelines for involving the public to ensure that all groups are represented and their needs considered. SGVCOG is committed to ensuring it serves the residents and businesses of the San Gabriel Valley fairly, consistently, and in the most cost-efficient and appropriate manner within available resources.

Goals of Public Participation

- Engage a broad cross-section of the public, including individuals from Title VI-protected groups.
- Ensure that diverse voices and perspectives are reflected in decision-making.
- Remove barriers to participation for historically underserved communities.
- Promote transparency and build trust between the agency and the public.

Public Engagement Strategies

To achieve these goals, SGVCOG employs the following strategies:

- **Community Meetings:** Host public meetings in accessible and convenient locations, including neighborhoods with high concentrations of minority, low-income, and LEP populations. Meetings will be scheduled at various times to accommodate different schedules.
- **Translation and Interpretation Services:** Provide translation of key documents and interpretation services upon request to ensure access for LEP individuals.
- **Accessible Communication:** Ensure that all informational materials are provided in accessible formats, including large print, Braille, and digital versions upon request.
- **Outreach to Community-Based Organizations:** Partner with local advocacy groups, nonprofits, and cultural organizations to reach diverse communities and encourage their participation.
- **Online Engagement:** Utilize the agency’s website, social media, and online survey platforms to collect input from residents who may not be able to attend in-person meetings.
- **Targeted Outreach:** Focus efforts in areas identified through demographic data having high concentrations of minority and LEP populations.

Public Notice Procedures

SGVCOG will notify the public of meetings, proposed projects, and opportunities for input through multiple channels:

- Agency website
- Social media platforms
- Email distribution lists
- Flyers posted at community centers, libraries, and other public spaces

Appendix D - Limited English Proficiency Plan/Language Access Plan

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” 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.

This SGVCOG Language Access Plan (“LAP” or “Plan”) is designed to comply with the aforementioned laws and regulations, specifically regarding Limited English Proficiency (“LEP”), to inform the general public of the region of the benefits and services available to them regarding LEP with regard to translation, interpretation, outreach, and other services as they pertain to individuals who are considered LEP. The guidance within this Plan aims to improve access to activities for LEP individuals, especially those activities that are critically important to LEP individuals and activities that LEP individuals frequently contact.

This section identifies the ways in which SGVCOG implements its Language Access Plan (LAP). The core methods used to implement the LAP include:

- Identifying LEP Individuals
- Language Assistance Services
- Staff Training
- Data and Tracking

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

1. The number or proportion of LEP people 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 the Agency.
4. The resources that are available for LEP people.

The San Gabriel Valley has a population of approximately 1,477,719 based on the three charts below (US Census: American Community Survey 2023 5-Year Estimate). Of these residents, majority speak Asian and Pacific Island languages and Spanish. Based on the large Chinese population in the SGV (https://ajsocal.org/wp-content/uploads/2021/05/A_Community_of_Contrasts_SGV_2018.pdf) it is assumed that the primary language of the Asian and Pacific Island Languages listed in the Census is Chinese.

SGVCOG procedure for processing interpretation (verbal) or translation (written) requests is as follows:

1. Public submits the request.
2. SGVCOG Title VI Coordinator Reviews and Forward the requests to Appropriate

Manager.

3. Appropriate Manager fulfills or denies the request.

Four-Factor Analysis

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

As shown in Tables 1-3 below, the San Gabriel Valley has approximately 1,477,719 residents. 23.9% of residents in the East SGV 37.4% of residents in the Southwest SGV, and 30.8% of residents in the Upper SGV are considered LEP persons, with the majority of those LEP persons primarily speaking Asian and Pacific Island Languages in all three. Spanish speakers also had a high percentage. As stated, it is assumed that Chinese is the primary language of the former mentioned category.

Table 1: Languages Spoken in the East San Gabriel Valley

Language Spoken	Group Population	Group % of Population	Portion that Speaks English Very Well	Portion that Does Not Speak English Very Well
English only	362,197	41.2%	362,197 (100%)	0 (0%)
Spanish	325,744	37.1%	215,668 (66.2%)	110,076 (33.8%)
Other Indo-European	14,962	1.7%	11,241 (75.1%)	3,721 (24.9%)
Asian & Pacific Island	167,990	19.1%	74,176 (44.2%)	93,814 (55.8%)
Other	7,513	0.9%	4,965 (66.1%)	2,548 (33.9%)
Total Population Over 5 Years	878,406	100%	668,247 (76.1%)	210,159 (23.9%)

Table 2: Languages Spoken in the Southwest San Gabriel Valley

Language Spoken	Group Population	Group % of Population	Portion that Speaks English Very Well	Portion that Does Not Speak English Very Well
English only	83,131	27.9%	83,131 (100%)	0 (0%)
Spanish	82,470	27.7%	55,893 (67.8%)	26,577 (32.2%)
Other Indo-European	5,562	1.9%	4,187 (75.3%)	1,375 (24.7%)
Asian & Pacific Island	125,772	42.2%	42,423 (33.7%)	83,349 (66.3%)
Other	1,084	0.4%	886 (81.7%)	198 (18.3)
Total Population Over 5 Years	298,019	100%	186,520 (62.6%)	111,499 (37.4%)

Table 3: Languages Spoken in the Upper San Gabriel Valley

Language Spoken	Group Population	Group % of Population	Portion that Speaks English Very Well	Portion that Does Not Speak English Very Well
English only	103,856	34.5%	103,856 (100%)	0 (0%)
Spanish	101,417	33.7%	62,215 (61.3%)	39,202 (38.7%)
Other Indo-European	6,800	2.3%	5,239 (77%)	1,561 (23%)
Asian & Pacific Island	87,657	29.1%	36,385 (41.5%)	51,272 (58.5%)
Other	1,564	0.5%	803 (51.3%)	761 (48.7%)
Total Population Over 5 Years	301,294	100%	208,498 (69.2%)	92,796 (30.8%)

Source for Tables 1-3: US Census: American Community Survey 2023 5-Year Estimate
<https://data.census.gov/table/ACSST5Y2023.S1601?g=060XX00US0603790810.0603793200.0603793510>

2) The frequency of LEP contacts.

No data has been collected regarding the frequency of contact with LEP people at the Agency. Most interactions with LEP people occur at outreach events for the ACE Project. The frequency of interactions with LEP people will need to be recorded.

Agency 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 (English and Spanish). Further, if translation services are needed, staff will provide the said translation in a timely manner.

3) The nature and importance of programs, services, or activities provided by the San Gabriel Valley Council of Governments.

As stated above, the Agency does not frequently receive requests for translations for their programs, services, or activities which are Federally funded. The federally recognized ACE Project, which purpose is to implement a construction program intended to mitigate the vehicle delays and collisions at rail-roadway crossings resulting from growing freight rail traffic in the San Gabriel Valley, is an important initiative for the region.

Though the Agency has received very few requests for translation services on Federally- funded projects, programs and services, staff is aware of the LEP residents and therefore it is highly likely that LEP residents will be stakeholder in any of the said projects, programs and services. As such, when staff encounter the need for translation services, staff have provided the services readily.

4) Resources Available for LEP people.

The Agency will implement the action plan listed in the next section.

Action Plan

To ensure compliance with Title VI, and Executive Order 13166 the following publications and services will be made available for LEP person use:

- a. Non-Discrimination Policy Statement
 - i. Statement shall be posted on the SGVCOG website in English, Spanish and Chinese.

- b. Title VI Rights Poster
 - i. Posters shall be posted on the SGVCOG website in English, Spanish and Chinese.

- c. Title VI Complaint Form
 - i. Complaint forms shall be posted on the SGVCOG website in English, Spanish and Chinese.

- d. Future Planning and Projects
 - i. SGVCOG 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.
 - ii. Additionally, the Agency will ensure that outreach materials are available in English, Spanish, and Chinese, and that translators are readily available as necessary for any LEP Persons that would like to contribute or participate.

Lastly, to ensure continuous compliance, the Agency will review the Title VI Implementation Plan and Limited English Proficiency Plan regularly, but at a minimum, as new data from the US Census becomes available. As new regulations are created, the Agency will act promptly to update the existing plans and relevant resources.

Four-Factor Analysis

To prepare this LEP Plan, SGVCOG referenced the U.S. Department of Transportation's (US DOT) four-factor LEP analysis, which considers the following factors:

1. The number and proportion of LEP people served or encountered in the eligible service population.
2. The frequency with which LEP people encounter SGVCOG programs, activities, or services.
3. The nature and importance of services provided by SGVCOG to the LEP population.
4. The resources that are available to SGVCOG to provide LEP assistance.

Based on the four-factor analysis, SGVCOG developed its LEP Plan as outlined in the following section.

Limited English Proficiency Plan Outline

How SGVCOG staff may identify a LEP person who needs language assistance:

1. Collect and examine records of language assistance requests (such as call logs from the public). to predict the need for language assistance at future events or meetings.
2. Collect demographic data to determine LEP assistance in our service areas.
3. Survey employees and contractors to record the frequency and type of language assistance requests made by residents or businesses.

SGVCOG will modify outreach strategies based on information gathered and survey results.

Language Assistance Measures

SGVCOG has numerous language assistance options available to LEP people, including both oral and written language services. There are also various ways in which SGVCOG staff and contractor staff respond to LEP people, whether in person, by telephone, or in writing, including:

- Printed brochures, service notices, and other vital documents in languages as needed.
- Bilingual staff that can assist clients in languages other than English.
- Assistance to LEP people at community events as needed.

Staff Training

The following training is provided for SGVCOG staff:

1. Overview of Title VI Policy and LEP Plan.
2. Review of language assistance services offered to the public.
3. Review of how to document language assistance requests.
4. Review of how to handle potential Title VI/LEP complaints.

Outreach Techniques

When staff prepare materials or schedule meetings, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the identified LEP population. Interpreters will be available on request.

Monitoring and Updating the LEP Plan

SGVCOG will update the LEP Plan as changes are required. SGVCOG will review and update the LEP Plan every three years or when higher concentrations of LEP individuals are present in a particular SGVCOG service area

Dissemination of the SGVCOG Title VI Policy and Limited English Proficiency Plan

The SGVCOG website includes its Title VI Policy, complaint form, and Limited English Proficiency Plan at <https://www.sgvco.org/titlevi>. A copy of the documents may be requested by any person or agency via telephone, email, mail, or in person and will be provided by the SGVCOG at no cost.

The frequency of LEP contacts

No data has been collected regarding the frequency of contact with LEP people at SGVCOG. Most interactions with LEP individuals occur at outreach events for the ACE Project. The frequency of interactions with LEP people will need to be recorded.

SGVCOG 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 (English, Spanish and Chinese). If translation services are needed, staff will provide translated materials in a timely manner.

The nature and importance of programs, services, or activities provided by the San Gabriel Valley Council of Governments.

The SGVCOG does not frequently receive requests for translations for their programs, services, or activities which are Federally funded. The federally recognized ACE Project, whose purpose is to implement a construction program intended to mitigate the vehicle delays and collisions at rail-roadway crossings resulting from growing freight rail traffic in the San Gabriel Valley, is an important initiative for the region.

Resources Available for LEP People

The SGVCOG will implement the action plan listed in the next section.

Appendix E – Website Notice

San Gabriel Valley Council of Governments Title VI Nondiscrimination Statement

The SGVCOG ensures compliance with Title VI of the Civil Rights Act of 1964, as amended to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

Any person who believes they have been discriminated against should contact:

San Gabriel Valley Council of Governments
Administrative Services Department
Title VI Coordinator
1333 South Mayflower Avenue, Suite 360
Monrovia, CA 91016
Telephone: (626) 457-1800

Appendix F – Website Complaint Process and Form

REPORTING DISCRIMINATION

You have a right to file a complaint if you believe that SGVCOG or one of its contractors has discriminated against you. To report your complaint, please complete the [Title VI Complaint Form](#) and mail or email to the contact below:

Mailing Address:

San Gabriel Valley Council of Governments
Administrative Services Department
Title VI Coordinator
1333 South Mayflower Avenue, suite 360
Monrovia, CA 91016

Email: Admin@SGVCOG.org

You may also file a complaint directly with the following state and federal agencies:

California Department of Transportation (Caltrans)

Title VI Liaison, District 7
100 S. Main Street, 12th Floor
Los Angeles, CA 90012

Federal Transit Administration

U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-102
Washington, DC 20590

By email: CivilRights.FHWA@dot.gov or FHWA.TitleVIcomplaints@dot.gov

Your Title VI complaint must be filed in writing within 180 days of the alleged discrimination date. SGVCOG will endeavor to complete an investigation within 90 days. If more information is needed to evaluate the complaint, Title VI staff will contact you.

Appendix G - U.S. Department of Transportation Title VI Assurances A-E

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees as follows:

- 1. Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

- 2. Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, age, sex, or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.

- 3. Solicitation for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor’s obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, national origin, age, sex, or disability.

- 4. Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.

- 5. Sanctions for Noncompliance:** In the event of a contractor’s noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 1. withholding payments to the contractor under the contract until the contractor complies; and/or
 2. cancelling, terminating, or suspending a contract, in whole or in part.

- 6. Incorporation of Provisions:** The contractor will include the provisions of paragraphs

one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided that if the contractor becomes involved in, or threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the California Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23 U.S.C., the regulations for the administration of the preceding statute, and the policies and procedures prescribed by the FHWA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the California Department of Transportation all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the California Department of Transportation and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the California Department of Transportation, its successors and assigns.

The California Department of Transportation, in consideration of the conveyance of said lands and interest in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or

under such lands hereby conveyed [,] [and]* (2) that the California Department of Transportation will use the lands and interests in lands and interest in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said lands, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(* Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the California Department of Transportation pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
 - 2. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non- discrimination covenants, the California Department of Transportation will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- B. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the California Department of Transportation will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the California Department of Transportation and its assigns.*

(* Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE.ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the California Department of Transportation pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, “as a covenant running with the land”) that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishings of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits or, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.) in the event of breach of any of the above of the above Non-discrimination covenants, the California Department of Transportation will have the right to terminate the (license, permits, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Nondiscrimination covenants, the California Department of Transportation will there upon revert to and vest in and become the absolute property of the California Department of Transportation and its assigns.

(* Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities, including, but not limited to: Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), prohibits discrimination

on the basis of sex;

- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 U.S.C. § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination of the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 – 12189) as implemented by Department of Transportation regulations 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging 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).

Appendix F - Title VI Annual Work Plan and Internal Review Program

The Title VI Coordinator will conduct an annual assessment of the accomplishments of the Title VI Implementation Plan and establish goals for next year. The assessment shall consist of an evaluation of the Title VI efforts utilizing the implementation plan and the Title VI Implementation Plan Checklist. The Title VI reviews of program areas and sub-awardees will be conducted annually.