

WITT O'BRIEN'S
PART OF THE **AMBIPAR** GROUP

WITH YOU WHEN IT COUNTS

Title VI Civil Rights Compliance

Training 1 of 4 | March 7, 2023



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GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR)

FEDERAL GRANT RESOURCES

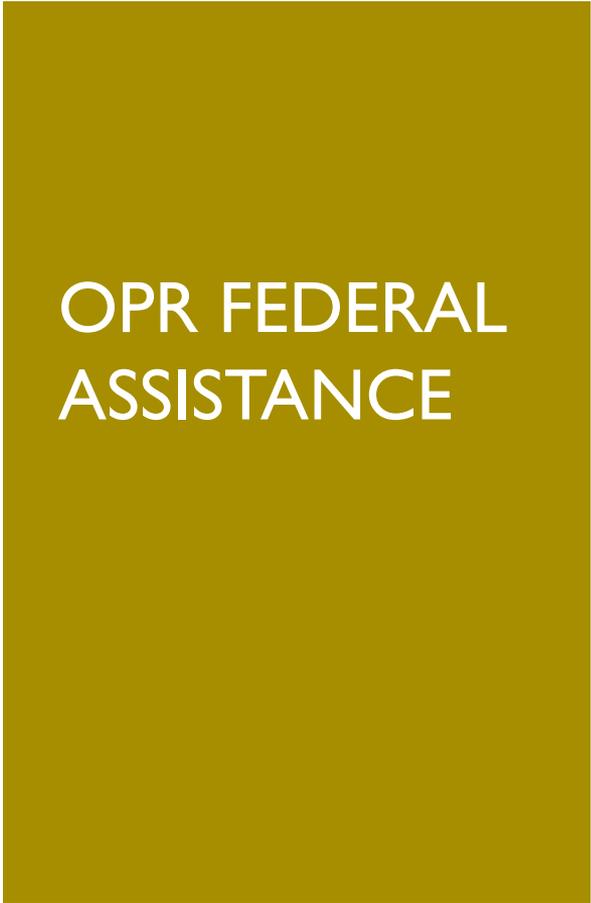




The screenshot shows the homepage of the Governor's Office of Planning and Research (OPR). The browser address bar displays <https://www.opr.ca.gov>. The navigation bar includes links for About OPR, Meetings, Publications, Partners, E-Lists, and Settings. The main header features the OPR logo and a search bar. Below the header, there are five navigation categories: CEQA & Federal Grants, Planning & Land Use, Climate & Resilience, Economic Development, and Long-Range Research. The main content area is divided into several cards:

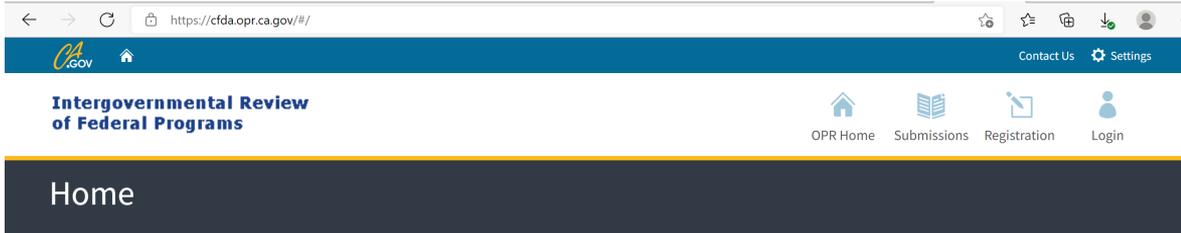
- CEQA: Getting Started**: A helpful guide for anyone who is just getting started learning about or implementing CEQA.
- State Clearinghouse**: Review of environmental documents prepared for CEQA.
- California Environmental Quality Act (CEQA)**: Reducing the potential environmental impacts of proposed projects.
- Federal Assistance**: Executive Order 12372 and federal grant resources. This card is highlighted with an orange border.
- CEQA Guidelines**: Key resources for understanding and implementing CEQA.
- Transportation SB 743**: Information on how transportation impacts are analyzed under CEQA.
- Judicial Streamlining**: Judicial streamlining for Environmental Leadership Development Projects (SB 7 and AB 900).
- Technical Advisories**: Resources to help practitioners use and comply with CEQA.

Below the cards, there is a section titled "ON THIS PAGE:" with four buttons: "What We Do", "Announcements", "Tools and Resources", and "Initiatives".



[Office of Planning and Research \(ca.gov\)](https://www.opr.ca.gov)

APPLYING FOR FEDERAL GRANTS E.O. 12372 PROCESS



The screenshot shows a web browser window with the URL <https://cfda.opr.ca.gov/#/>. The page header includes the CA.GOV logo and navigation links for "Contact Us" and "Settings". Below the header, there are four main navigation icons: "OPR Home", "Submissions", "Registration", and "Login". The main content area features a dark blue banner with the word "Home" in white text.

The State Clearinghouse (SCH) serves as the state's Single Point of Contact for the submission of Federal assistance applications pursuant to [Presidential Executive Order No. 12372](#) and [SAM Section 0912](#). With the signing of [Assembly Bill 1348](#) the State Clearinghouse is responsible for reporting on all federal grants applied for and received in California regardless if they fall under Executive Order 12372. We have developed the new on-line database to assist with that reporting.

These applications must be provided to the SCH, which in turn publishes this information for review by State and local elected officials. The submittal of the SF-424 form on this website begins a 30-day review period. The SCH does not administer grant programs or offer any grant funding. Please visit [Grants.gov](#) for funding opportunities.

Federal Assistance Application

To apply for a federal assistance program, please upload a copy of your application cover form (Standard Form 424) to the SCH. DO NOT send your full application package or any other supplemental information.

In the appropriate box on Form 424, mark that the federal assistance application was made available for state review under the Executive Order 12372 process before submitting your federal assistance application to the federal funding agency.

* Organization Name

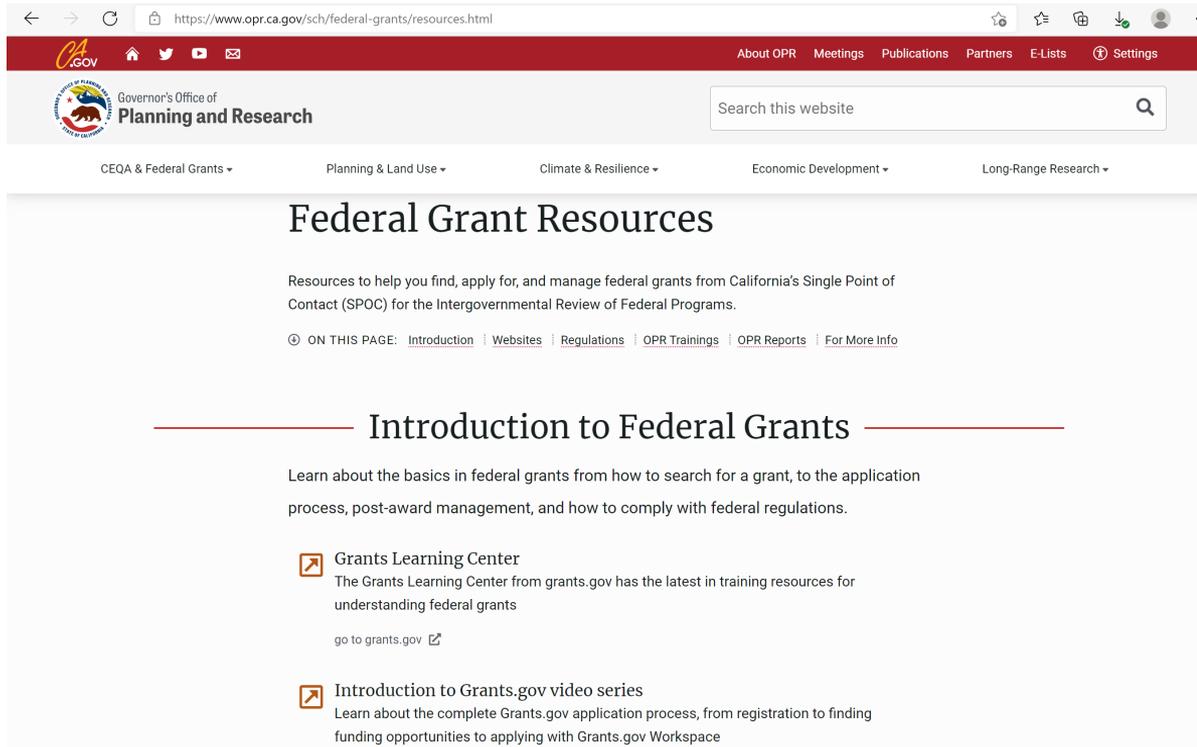
* Email Address

* Catalogue of Federal Domestic Assistance (CFDA)



[OPR Intergovernmental Review of
Federal Programs | EO 12372 |
California](#)

FEDERAL GRANT RESOURCES



The screenshot shows a web browser displaying the California Governor's Office of Planning and Research website. The page title is "Federal Grant Resources". The navigation bar includes links for "About OPR", "Meetings", "Publications", "Partners", "E-Lists", and "Settings". The main content area features a search bar and a navigation menu with categories: "CEQA & Federal Grants", "Planning & Land Use", "Climate & Resilience", "Economic Development", and "Long-Range Research". The main heading is "Federal Grant Resources", followed by a sub-heading "Introduction to Federal Grants". Below this, there is a paragraph explaining the resources and a list of links: "Introduction", "Websites", "Regulations", "OPR Trainings", "OPR Reports", and "For More Info". The "Introduction to Federal Grants" section includes a sub-heading "Introduction to Federal Grants" and a paragraph: "Learn about the basics in federal grants from how to search for a grant, to the application process, post-award management, and how to comply with federal regulations." Below this are two items: "Grants Learning Center" and "Introduction to Grants.gov video series".

https://www.opr.ca.gov/sch/federal-grants/resources.html

CA .GOV

About OPR Meetings Publications Partners E-Lists Settings

Governor's Office of Planning and Research

Search this website

CEQA & Federal Grants Planning & Land Use Climate & Resilience Economic Development Long-Range Research

Federal Grant Resources

Resources to help you find, apply for, and manage federal grants from California's Single Point of Contact (SPOC) for the Intergovernmental Review of Federal Programs.

ON THIS PAGE: [Introduction](#) | [Websites](#) | [Regulations](#) | [OPR Trainings](#) | [OPR Reports](#) | [For More Info](#)

Introduction to Federal Grants

Learn about the basics in federal grants from how to search for a grant, to the application process, post-award management, and how to comply with federal regulations.

-  **Grants Learning Center**
The Grants Learning Center from grants.gov has the latest in training resources for understanding federal grants
[go to grants.gov](#)
-  **Introduction to Grants.gov video series**
Learn about the complete Grants.gov application process, from registration to finding funding opportunities to applying with Grants.gov Workspace

[Federal Grant Resources - Office of Planning and Research \(ca.gov\)](https://www.opr.ca.gov/sch/federal-grants/resources.html)

FEDERAL GRANT EMAIL LIST



Sign up for Federal Grant Updates

Updates on federal grant opportunities, news, and trainings.

* Email

First Name

Last Name

Sign Up

By submitting this form, you are consenting to receive marketing emails from: Governor's Office of Planning and Research or California Strategic Growth Council, 1400 Tenth Street, Sacramento, CA 95814, US

You can revoke your consent to receive emails at any time by using the [SafeUnsubscribe](#) link, found at the bottom of every email.

[Emails are serviced by Constant Contact](#)

Federal Funding News

EPA Announces \$600 Million in Water Infrastructure Funding for California

The EPA announces \$609 million in funding to California from the Bipartisan Infrastructure Law to fund water infrastructure through the State Revolving Fund programs.

[Learn more](#)



USDA Awards 23 Grants to CA to Support Local and Regional Food Systems

The USDA Local Agriculture Marketing Program awards 203 grants nationwide, including 23 to California, to support farmers markets, local food promotion, and regional food systems.

[Learn more](#)



New Federal Grant Opportunities

Many more opportunities are at [grants.gov](#).



Grants for Arts Projects

To support public engagement with, and access to, various forms of art across the nation, the creation of art, learning in the arts at all stages of life, and the integration of the arts into the fabric of community life.

Due: February 10, 2022

[Learn more](#)

[Signup Form \(constantcontactpages.com\)](#)

THANK YOU

- Amy Miller
- Federal Grant Administrator
- Amy.Miller@OPR.CA.GOV
- 916-445-0614





Governor's Office of **Planning and Research**

DISCLAIMER

The information shared here does not represent legal advice or an endorsement of any organization or its commercial products by OPR but is provided as a service to the grants community.

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WITH YOU WHEN IT COUNTS

Title VI Civil Rights Compliance

Training 1 of 4 | March 7, 2023



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WELCOME! TODAY WE WILL:

- Explore Title VI requirements
- Discover resources to support the development of your organization's equity strategy and Title VI plan
- Review case studies and examples of real-world applications and equity framework trends in Notice of Funding Opportunities (NOFO)
- Understand the importance of being Title VI ready to best position your organization for the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)

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PRESENTERS



MITZI MCMAHAN
WITT O'BRIEN'S



DEMITRA KOURTZIDIS
WITT O'BRIEN'S

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AGENDA

Title VI Overview

Components of a Title VI Plan

**How Title VI Readiness
Creates Funding Opportunities**

Q&A

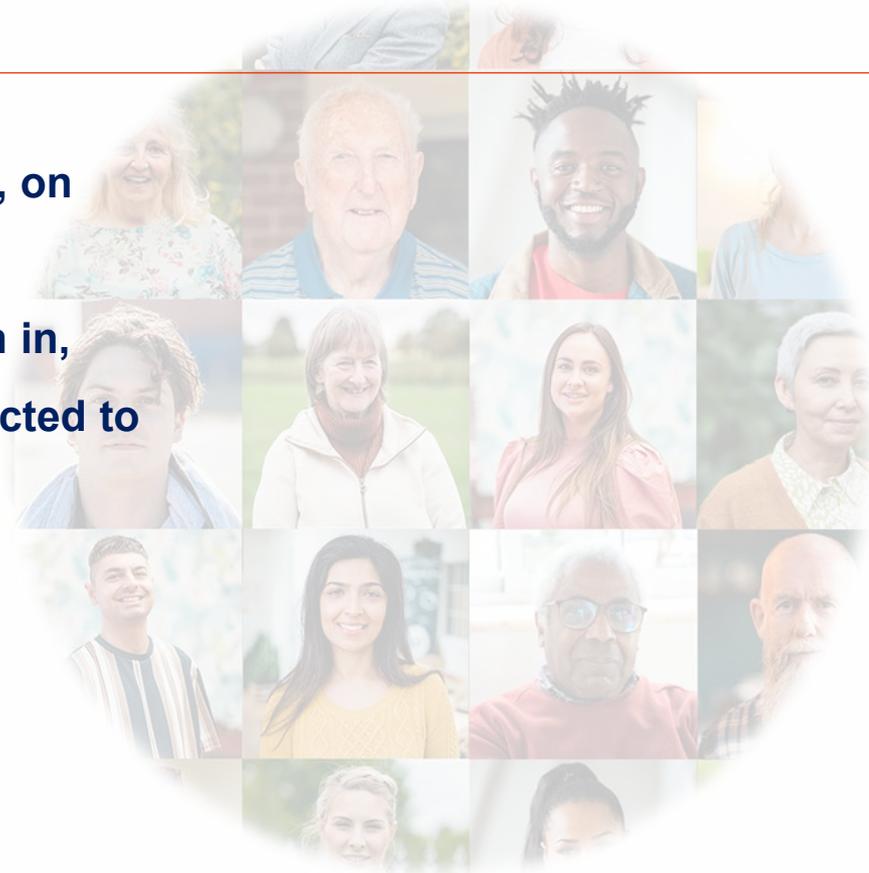
A grid of diverse people's faces in the background, representing various ages, ethnicities, and genders. The faces are arranged in a grid pattern, with some individuals appearing more prominently than others. The overall tone is positive and inclusive.

Title VI Overview

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

42 U.S.C. § 2000d, et. Seq.

“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.”





TITLE VI IN ACTION

- Seek feedback and ideas from all members of community and include people with Limited English Proficiency (LEP)
- Consider how programs and projects will impact historically underserved communities (economically, environmentally, socially, etc.)
- Document how to ensure non-discrimination in programs and services
- Create a Title VI-positive culture and educate employees

TITLE VI IS FAR REACHING

- Any entity that receives federal financial assistance shall comply with Title VI in all its programs and activities
- To be compliant, you must have written policies and procedures aligning with the federal requirements
- Many requirements are evolving, but the basics for planning are available

DEFINITION OF IMPORTANCE

“Program or activity” means all the operations—any part of which is extended Federal financial assistance—of:

- A department, agency, special purpose district, or other instrumentality of a State or of a local government; or
- The entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local governmental of the operations of any entity”

[FOR MORE INFORMATION SEE FEDERAL REGISTER NOTICE](#)



Components of a Title VI Plan

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KNOW YOUR FEDERAL FUNDING SOURCES AND HAVE A TITLE VI ROLE

Know your organization's federal funders

- Look to your federal funders for specific guidance on requirements

To help facilitate this work (and as part of your data collection)

- Designate a person to have responsibility for implementation and compliance across your organization, staff, and, if applicable, sub-recipients
- Provide access to the lead decision-maker in the organization

And be sure to **document, document, and document** some more!

DOCUMENTING YOUR TITLE VI EFFORTS

1. Data Collection
2. Notices of Rights and Complaints
3. Language Access for Limited English Proficiency | [Executive Order 13166](#)
4. Public Participation
5. Employee & Subrecipient Training

DATA COLLECTION – GATHER ACCURATE & TIMELY DEMOGRAPHIC DATA

- Look for existing data sources as a starting point
- The demographic data should help describe the communities you serve - collect data that include participants' race, color, national origin, primary language and income, among other data considerations
- Data collection should happen through all points of your process
- *Example:* Any calls for information challenged by language barriers are documented and used to inform future Title VI planning

NOTICE OF RIGHTS – ENSURE THE PUBLIC IS AWARE OF THEIR RIGHTS

Post Notice of Rights/Notice of Nondiscrimination signage

- Where the public interacts with your organization
- On your website

metro.net

Metro Notice of Civil Rights

The Los Angeles County Metropolitan Transportation Authority (Metro) operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI, Metro also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status, sexual orientation or any other protected classes as described in State or Federal laws. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with Metro. For more information on Metro's civil rights program and the procedure to file a complaint, please contact Metro using the information listed below.

Aviso de Metro sobre derechos civiles
 La Autoridad de Transportación Metropolitana del Condado de Los Angeles (Metro) opera sus programas y servicios sin consideración de raza, color u origen nacional, de acuerdo al Título VI del Acta de Derechos Civiles. En adición al Título VI, Metro también prohíbe la discriminación basada en el sexo, edad, discapacidad, religión, condición médica, estado civil, orientación sexual, o cualquier otra categoría protegida, como se describe en las leyes federales o estatales. Cualquier persona que cree que ha sido víctima de alguna práctica discriminatoria puede presentar una queja con Metro. Para más información acerca del programa de derechos civiles de Metro y del procedimiento para presentar una queja, por favor contacte a Metro usando la información proporcionada adentro.

Thông báo của Metro về Dân Quyền
 Cơ Quan Vận Chuyển Đô Thị Quận Hạt Los Angeles (Los Angeles County Metropolitan Transportation Authority - Metro) điều hành các chương trình và dịch vụ của cơ quan mà không phân biệt sắc tộc, màu da, và nguồn gốc quốc gia theo Tiêu đề VI của Đạo Luật Dân Quyền. Ngoài Tiêu đề VI, Metro cũng nghiêm cấm phân biệt đối xử dựa trên giới tính, tuổi, tình trạng khuyết tật, tôn giáo, tình trạng bệnh tật, tình trạng hôn nhân, xu hướng tính dục hay những phân loại khác được bảo vệ theo như mô tả trong luật Tiểu Bang hay Liên Bang. Bất kỳ ai tin rằng mình bị phân biệt đối xử bất hợp pháp đều có thể khiếu nại với Metro. Để biết thêm thông tin về chương trình dân quyền của Metro và thủ tục khiếu nại, vui lòng liên lạc với Metro qua những cách dưới đây.

洛杉磯大都會交通局公民權利通告
 洛杉磯大都會交通局 (Metro)之營運計劃與服務，依照《民權法案》第六條之規定，不得種族、膚色及籍貫而有所區別。除第六條之外，Metro亦禁止基于性別、年齡、殘障、宗教等任何受保護類別之歧視。任何人士如受到非法歧視的侵害，請使用以下聯絡資料向Metro 投訴。

ԱՅՏԻՆ-ի Շմանցումը Քաղաքացիական Իրավունքների Վերաբերյալ
 Լոս Անջելես քաղաքի մետրոպոլիտան տրանսպորտի վարչությունը (Metro) իրացնում է իր ծրագրերը և ծախսաբյուջաները առանց առանձնապես մարզի ցեղիկ եւ ազգային խոսքերի կարգադրության: Այդպես կարգադրվում է Քաղաքացիական Իրավունքների մասին օրենքի մասին VI-ի: Իրացում է նաև սարքավորված է խտրաբարությունը սեռի, տարիքի, խաչմուխի, անասունի վնասված, անասունների կարգադրության, սեռական կարգադրության կամ ցեղական ուղղությունների գրանցվածքների հիման վրա: Այդպես թա կարծիք է նախադրել կամ զրկելովն օրենքներով նախատեսված, ուղղությունը և որ կարգադրվել է սարքավորված խտրաբարության, կարող է բացարձակապես Metro-ին: Metro-ի քաղաքացիական Իրավունքների ծրագրերի մասին և բացարձակապես կարգադրության ծրագրի մասին կարող եք կապվել հետևյալ ինֆորմացիայի մեջ: Metro-ի քաղաքացիական Իրավունքների մասին կարող եք կապվել հետևյալ ինֆորմացիայի մեջ: Metro-ի քաղաքացիական Իրավունքների մասին կարող եք կապվել հետևյալ ինֆորմացիայի մեջ:

• **Հարգանքներ Metro-ին** [\(English\)](#)

메트로 Metro의 공민권 통지서
 로스앤젤레스 카운티 도시교통국 (Metro)은 국민권장 제6조에 관하여 인종, 피부색 및 출신국에 상관없이 모든 국민 및 서비스를 운영합니다. 또한 메트로에는 공민권장 제 4조에 추가해서 성별, 연령, 장애, 종교, 의료 상태, 결혼 여부, 성적 성향 또는 다른 법령에서 규정하는 다른 보호 등급에 근거한 차별 대우를 금지합니다. 법외적인 차별 대우로 인해 괴리를 경험하고 싶지 않는 사람은 누구나 Metro에 상하로 고소할 수 있습니다. Metro에 불만을 표출하는 모든 시민은 불만 제기 절차에 대한 상세한 정보도 알고자하면, 정보에 이용해서 Metro에 연락하십시오.

Metroからの公民権に関するお知らせ
 ロサンゼルス郡運輸局(Metro)は、公権法第6条に定めて人種、皮膚の色、出身国に拘わらずに事業を行っています。タイトルVIに加え、Metroは性別、年齢、障害、宗教、医療的な状態、結婚状態、性的指向、あるいは州法または連邦法に定められたその他の「プロテクテッドクラス (protected classes)」に基づく差別を禁止しています。不正な差別待遇を受けたいと思う人は、誰でも Metroに對して苦情を提出することができます。Metroの公民権プログラムと苦情提出手順書に関する詳細は、以下の方法で Metroまでお問い合わせください。

Уведомление Metro о гражданских правах
 Транспортное управление округа Лос-Анджелес (Metro) реализует свои программы и предоставляет услуги независимо от расы, цвета кожи и национального происхождения в соответствии с Разделом VI Закона о гражданских правах

COMPLAINT PROCEDURES – DEFINE AND MAKE THE PROCESS READILY AVAILABLE

- Have a procedure for filing complaints, a procedure for investigating complaints, and a Title VI complaint form
- Post the procedures, form, and point of contact on your website and translate each into the top languages used in your community
- Consider formats for community members that might not have access to technology

8. Explain the events that took place and why you believe you or another person was subject to a discriminating, intimidating or retaliating act(s). For example, indicate who was involved and how another person treated you differently than others. (Attach additional sheets, if necessary. Attach a copy of written materials that support your complaint.)



LANGUAGE ACCESS – UNDERSTAND NEEDS AND HAVE A PLAN TO ADDRESS THEM

Language Access Plan - a document that outlines how to provide services to individuals who are non-English speaking or have limited English proficiency (LEP)

- Should be tailored to individual organizations, but may include similar sections, such as a needs assessment, language services offered, notices, training for staff, and evaluation
- Will vary based on community demographics

I Speak Chinese.

I need assistance and have the right to receive assistance in my spoken language. Please provide me with an interpreter and note my spoken language in your permanent records. Thank you.

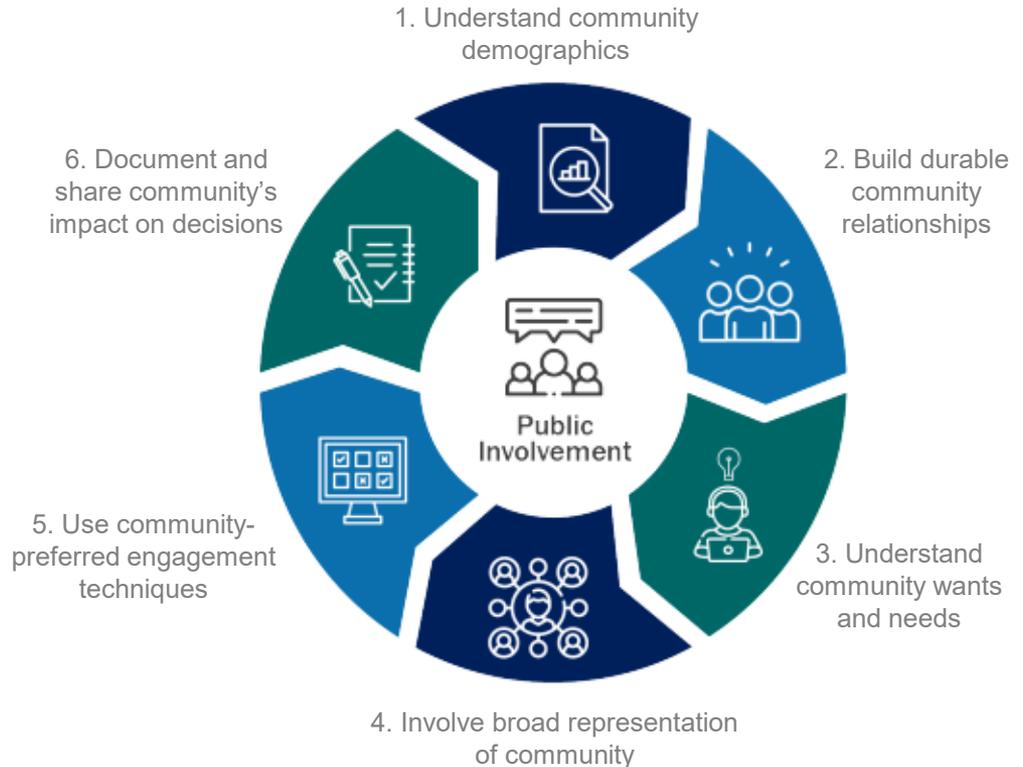
我说的是汉语普通话。

在口述交流过程中，我有需要并且有权利接受帮助。请为我配备一位译员并在记录中说明在日后的交流中我将使用汉语普通话。



PUBLIC PARTICIPATION – DEVELOP A PLAN

Create a plan tailored to your community that demonstrates a commitment to meaningful public participation.



PUBLIC PARTICIPATION - ENCOURAGE TRANSPARENT & MEANINGFUL COMMUNICATION

Some useful tactics:

- Develop a toolkit of options with diverse outreach tools and inclusive communications strategies
- Cultivate relationships with community-based organizations
- Consider how programs or activities will potentially impact communities and have a forum for feedback
- Ensure diverse views are considered throughout all stages of the consultation, planning, and decision-making processes
- Leverage various channels of communication (Social media, relationships with community organizations, staff associations, etc.)

EMPLOYEE & SUBRECIPIENT TRAINING

- Design training to develop awareness and sensitivity in carrying out federally funded programs
- Include information on accessing language assistance tools
- Periodically host Title VI training seminars particularly for those individuals responsible for monitoring sub-recipients for Title VI compliance
- Provide new employees a copy of the Title VI plan as part of the onboarding and orientation process

FOR YOUR TITLE VI PLANNING, CONSIDER

- Minority Representation on Boards/Committees
- Environmental Justice ([Executive Order 12898](#))
- Compliance and Monitoring
- Any Federal Funding Agency Specifics



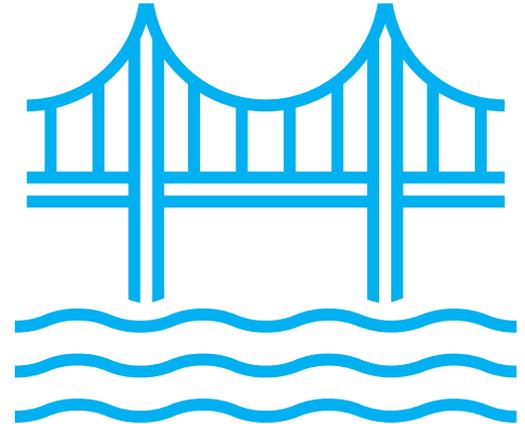
Title VI Readiness is a Part of Your Equity Strategy and Paves the Way for Funding

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AN EFFECTIVE TITLE VI PLAN CAN HELP YOU WIN COMPETITIVE FUNDING

- An equity strategy for your agency should include Title VI.
- Having a Title VI plan and equity strategy will help inform your planning and funding strategies.
- Through the Justice40 Initiative (Executive Order 14008), the federal government aims to direct 40% of the benefits of certain Federal investments to disadvantaged communities.
- The incoming federal infrastructure awards will go to jurisdictions that can demonstrate a commitment to equity and environmental justice.



CONSIDERING ENVIRONMENTAL JUSTICE

Environmental Justice considerations for impacts on underserved communities (minority and low-income) must be considered in all stages of the project/program development process through closeout/completion ([EO 12898](#), [EO 14008](#), [EO 13985](#)).

Applications for many federal grants will be more competitive if they:

- Contribute to environmental justice for communities that disproportionately experience the negative impacts of climate change.
- Target at least 40% of resources and benefits towards low-income, historically disadvantaged, underserved, or overburdened communities.

For more information, see the Administration's [Justice40 Initiative](#).

EXAMPLE FROM THE USDOT'S SMART GRANTS PROGRAM NOFO

The Department seeks to award projects that address environmental justice.

As part of its implementation of Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, the Department:

Seeks to fund projects that, to the extent possible, ***target at least 40 percent of resources and benefits towards low-income communities, disadvantaged communities, communities underserved by affordable transportation, or overburdened communities.***

Projects that have not sufficiently considered climate change and environmental justice in their planning will be required to do so before receiving funds.

FEDERAL AGENCY EQUITY ACTION PLANS

- Federal agencies have drafted equity action plans ([Advancing an equitable government | Performance.gov](#)).
- Consider the agencies that fund your organization. Review the Equity Action Plans and any other associated guidance for updates and ideas for your plans and communities.

TIMELINE OF USDOT ACTIONS

Reinvigorate USDOT's programmatic enforcement of Title VI of the Civil Rights Act of 1964, the National Environmental Policy Act of 1969, the American with Disabilities Act, Section 504 of the Rehabilitation Act, and the Air Carrier Access Act.

JUN 2021

Conduct assessment of MPO and State DOT inclusion of quantitative equity screenings and meaningful and representative public participation in STIPs and TIPs.

JUN 2022

Issue guidance for USDOT funding recipients to meet the requirements of meaningful public participation under Title VI, NEPA, and other existing requirements, with accompanying best practices and trainings.

MAR 2023

Establish Department-wide monitoring of USDOT funding recipient compliance with their meaningful public participation obligations.

SEPT 2023

THE IMPACTS OF NON-COMPLIANCE

Ensuring that your organization is compliant is critical to your success and resiliency – and your ability to continue to receive federal funding.

Civil Rights Complaint Filed Against TxDOT for Ongoing Discrimination Against Houston Residents Adversely Affected by the North Houston Highway Improvement Project

This additional complaint is necessary because TxDOT has continued to discriminate on the basis of race, color, and national origin – even after FHWA initiated a Title VI investigation – and has retaliated against persons and groups for filing previous civil rights complaints by threatening to remove funding from the Houston-Galveston region altogether if the agency is not allowed to construct its preferred version of the NHHIP.

EVERY JOURNEY STARTS WITH A STEP OR AN IDEA



- Review your existing policies, procedures, and practices
- Take stock of what you already have in place (data collection, training, public engagement, language access planning, complaint procedures, etc.)
- Ask questions of your team, professional organizations, industry leaders, and your federal partners

ADDITIONAL RESOURCES

California Civil Rights: <https://calcivilrights.ca.gov/>

Federal Highway Administration (FHWA):

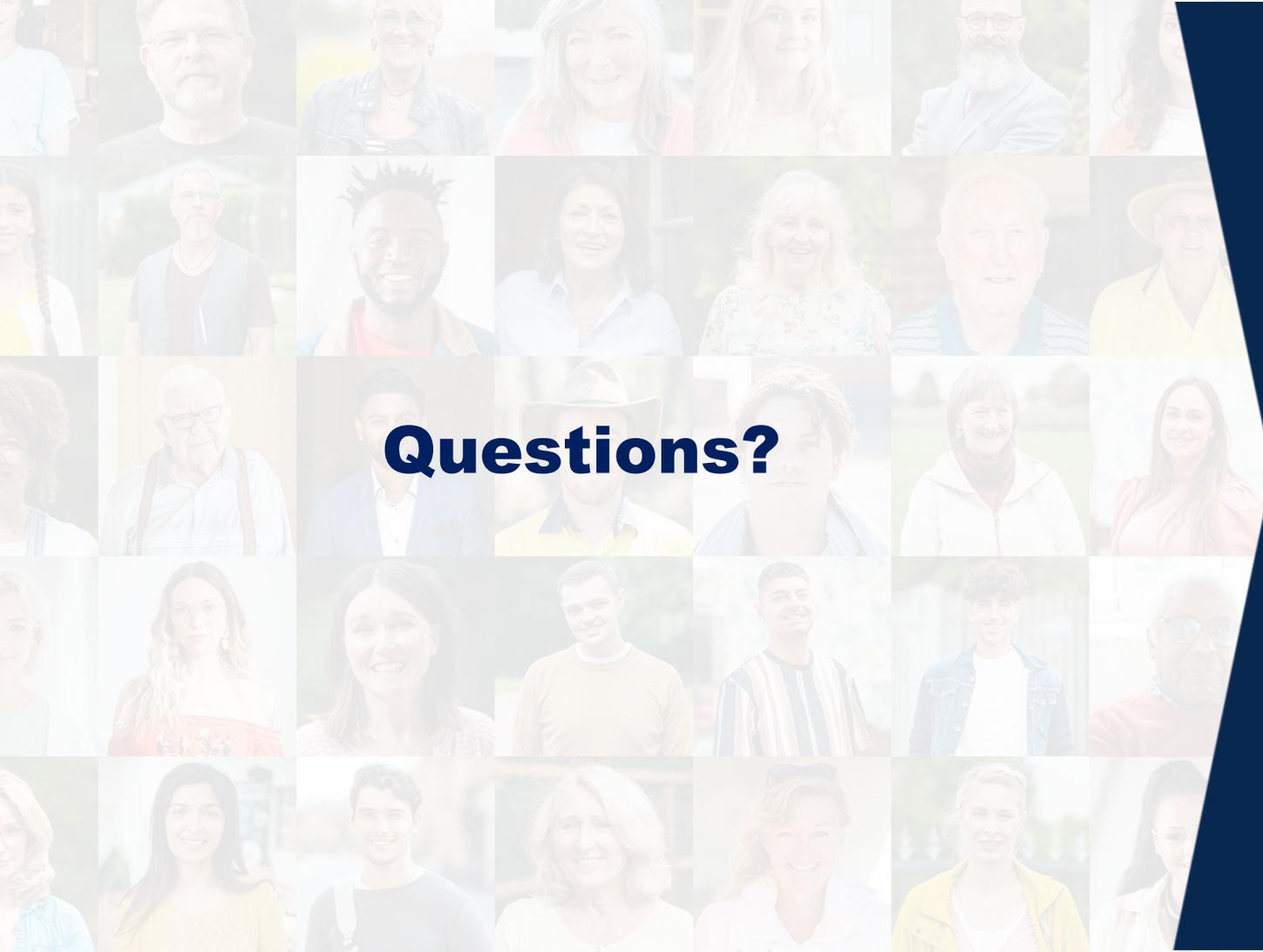
- Civil Rights Toolkit: https://www.fhwa.dot.gov/civilrights/programs/title_vi/toolkit.cfm
- Filing a complaint: <https://www.fhwa.dot.gov/civilrights/file/>
- Office of Tribal Transportation: <https://highways.dot.gov/federal-lands/programs-tribal>

US Department of Health and Human Services (HHS): [OCR Home | HHS.gov](#)

US Department of Homeland Security (DHS): <https://www.dhs.gov/topics/civil-rights-and-civil-liberties>

California Department of Transportation (Caltrans): <https://dot.ca.gov/programs/local-assistance/guidance-and-oversight/title-vi>

Language Access Planning: [Welcome to LEP.gov](#)



Questions?

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THANK YOU FOR YOUR TIME

Following today's training, the following will be sent to you:

- Post-training survey
- Resource Guide – Title VI Self-Assessment

We will see you at the next training!

CAL OPR TRAINING SERIES

MARCH 14TH / 12-1 PM / PST

MAXIMIZING FEDERAL FUNDS – ARPA AND BIL

MARCH 21ST / 12-1 PM / PST

**ARPA GRANT IMPLEMENTATION: ADMINISTRATIVE, INDIRECT,
AND DIRECT COSTS**

MARCH 28TH / 12-1 PM / PST

ARPA COMPLIANCE SUPPLEMENT ADDENDUM

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