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Approved by Public Works Director:


Carla Short, Director

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Date

PURPOSE

This procedure is designed to formalize San Francisco Public Works' policies, procedures and practices for ensuring compliance with Title VI, as well as related regulations and executive orders, such as Executive Order 13166 on Limited English Proficiency (LEP) and Executive Order 12898 on Environmental Justice. Through this procedure, San Francisco Public Works aims to advance equity and inclusivity across all its programs and activities, ensuring meaningful access and participation for all San Francisco residents.

POLICY

Nondiscrimination Policy Statement:

San Francisco Public Works plays a critical role in maintaining and improving the City's infrastructure and public spaces. As a recipient of federal financial assistance, San Francisco Public Works is committed to ensuring that its programs, services and activities comply fully with Title VI of the Civil Rights Act of 1964. This landmark legislation prohibits discrimination based on race, color or national origin in programs receiving federal funds.

San Francisco Public Works prohibits discrimination in all its programs, services and activities on the basis of race, color, national origin, sex, age, disability or income status. This policy extends to all aspects of its operations, including employment practices, public participation and the delivery of public services. This Non-discrimination Policy Statement is a cornerstone of this commitment and is publicly available on San Francisco Public Works's website (sfpublicworks.org).

United States Department of Transportation (USDOT) Standard Title VI Assurances:

San Francisco Public Works has executed the USDOT Standard Title VI Assurances, which include Appendices A–E, as required by USDOT Order 1050.2A. These assurances affirm that San Francisco Public Works will take proactive steps to prevent discrimination in any program or activity receiving federal funding.

Key provisions include:

- Requiring nondiscrimination clauses in all federally funded contracts, agreements and subcontracts.
- Monitoring subrecipients to ensure their compliance with Title VI.

- Submitting signed assurances to Caltrans annually as part of the agency's compliance reporting process.

The signed assurances are incorporated into every federally funded agreement, ensuring that San Francisco Department of Public Work's partners uphold the same nondiscrimination standards.

DISCUSSION

Title VI requires that local public agencies provide a Title VI Compliance Plan providing clear procedures that include clear definitions of roles and responsibilities for Title VI compliance, proactive public participation strategies targeting underserved populations, provisions to address annual reviews and audits to ensure compliance by San Francisco Public Works and its subrecipients and complaint-handling procedures. This procedure and its associated procedures together constitute the Public Works Title VI Compliance Plan:

- For complaint-handling procedures under Title VI to address potential discrimination, see 03-03-07 (Title-VI-of-the-Civil-Rights-Act-Processing-Discrimination-Complaints).
- For Title VI Training, see 03-05-18 (Title-VI-of-the-Civil-Rights-Act-Training-Plan).
- For demographic data collection at public meetings and hearings, see 02-02-06 (Title-VI-of-the-Civil-Rights-Act-Public-Participation-Data-Collection) with attachments.

PROCEDURE

1. The director of Public Works provides executive oversight for Title VI requirement compliance and ensures the agency's strategic alignment with Title VI requirements, signs the annual Title VI Nondiscrimination Policy Statement and oversees enforcement actions for noncompliance.
2. The Title VI coordinator (manager of the Bureau of Regulatory Compliance and Remediation (RCR)) oversees the development and implementation of the Public Works Title VI Plan, manages interactions with Caltrans and the Federal Highway Administration (FHWA) for the processing and resolution of Title VI complaints, oversees and sets requirements for recordkeeping and data storage and submits annual compliance reports for submission to Caltrans. The Title VI coordinator also establishes training plans with yearly goals for all staff executing the administrative functions of the Title VI Plan.
3. Each division deputy, or a delegee within the division designated by that division's deputy, ensures compliance within their division:
 - a. Deputy, Operations Division: Monitors equitable provision of street-environmental services, building and street-repair services, urban forestry services and code enforcement.
 - b. City engineer: Reviews delivery of infrastructure repair and maintenance to ensure no disparity based on geographic or demographic factors.
 - c. Deputy director, Support Services Division: Reviews asset management to ensure no disparity based on geographic or demographic factors; monitors demographic data to identify potential barriers to permit access.
 - d. Deputy director, Project Delivery: Ensures and documents that project managers are trained to recognize and address Title VI issues during public interactions, such as assisting Limited English Proficiency (LEP) individuals or responding to public inquiries

about service disparities; ensures contractors and subrecipients understand and fulfill their Title VI obligations, including demographic reporting and outreach compliance.

4. The commission affairs manager, or that person's delegee, monitors Title VI compliance as it relates to the hearings of the Public Works Commission.
5. The chief information officer ensures that adequate technological resources for Title VI Plan administrative support, as determined by the Title VI coordinator, are provided, including specialized software (geographic information system (GIS) software such as ArcMap/ArcGIS, statistical-analysis software such as IBM SPSS Statistics and R) and data storage and retrieval systems.
6. The manager of the Performance and Planning Office identifies staff within that office as constituting the Civil Rights Unit for Public Works for the purposes of Title VI compliance. For the purposes of Title VI compliance activities in this procedure, this unit receives direction primarily from the Public Works Title VI coordinator, and secondarily from the manager of the Performance and Planning Office. This unit executes the following administrative functions of Title VI plan implementation:
 - a. The unit conducts equity analysis by comparing collected demographic data with division-deputy and commission-affairs-manager reporting to identify and document inequities in service provision and potential barriers to access:
 - The unit collects data from the Operations Division on the monitoring of the equitable provision of street-environmental services, building and street repair services, urban forestry services and code enforcement.
 - The unit collects data from the city engineer on the delivery of infrastructure repair and maintenance to determine whether disparities exist based on geographic or demographic factors.
 - The unit collects data from the Support Services Division needed to evaluate whether there are disparities in asset management and/or potential barriers to permit access.
 - The unit collects data from the Project Delivery Division on how project managers address Title VI issues during public interactions, such as assisting individuals with LEP or responding to inquiries about service disparities, and collects information necessary to document contractor and subrecipient compliance with Title VI requirements.
 - The unit collects data from the Public Works Commission on how the commission managers address Title VI issues during public interactions, such as assisting individuals with LEP.
 - The unit conducts demographic analysis on the data gathered above to evaluate whether specific demographic groups or communities experience disproportionate reductions in access to services and to information. To support this analysis, the unit uses census data along with local, state and federal mapping and database resources. The unit incorporates into its analysis information from voluntary surveys conducted during public meetings, project consultations and service interactions to assess participation by potentially underserved populations. The unit uses IBM SPSS Statistics or the R system for statistical computation and graphics for statistical analysis and graphical display of statistical information. The unit uses GIS technology to analyze the

geographic distribution of services, for example, to identify communities that may be experiencing delays in service frequency to address disparities in resource allocation.

- b. The unit actively collects documentation from its program manager partners and maintains records of all public participation and outreach activities. The unit collects documentation of all collaborations with community organizations, and tracks participation demographics to evaluate outreach effectiveness and refine engagement strategies for underserved communities. It monitors the production of public notices, meeting materials, and service updates to ensure these materials are translated into the City's most commonly spoken languages as per the Language Access Ordinance.
- c. The unit conducts an annual Four-Factor Analysis to determine the language assistance needs of its service population. This analysis includes:
 - Identifying neighborhoods with high concentrations of non-English speakers using United States Census Bureau data and community surveys.
 - Tracking the frequency of interactions with LEP individuals in programs such as street permits and infrastructure repair consultations.
 - Assessing the nature and importance of services, prioritizing critical services like public safety notices and infrastructure updates for language translation.
 - Evaluating available resources and costs to balance language assistance needs with budgetary constraints in accordance with Executive Order 13166.
- d. The unit works collaboratively within Public Works to ensure that Title VI policy is disseminated widely through prominent placement on public notices, project materials and outreach communications.
- e. The unit verifies the availability of language assistance services, which include the translation of key documents, such as permit applications and public notices, into Spanish, Chinese and Tagalog. It ensures real-time interpretation is provided during public meetings, including virtual platforms, and operates a dedicated hotline offering live translation support.
- f. The unit organizes and provides training for subrecipients on compliance with Title VI requirements, including the inclusion of nondiscrimination clauses in contracts and the collection and reporting of demographic data as required by Caltrans Local Assistance Procedures Manual (LAPM), Chapter 9. The unit maintains attendance logs and training materials for three years.
- g. At the beginning of each fiscal quarter, the unit provides a memorandum containing a summary of all data collection and analysis results to the Title VI coordinator.
- h. By May 1 of each year, the unit submits a draft Title VI compliance report as per Caltrans LAPM, Chapter 9 for the following fiscal year for the Title VI coordinator's approval. The plan will contain corrective-action plans with established timelines to be implemented to address any deficiencies the unit has identified and verified.
- i. The unit maintains all Title VI-related records digitally to ensure audit readiness. Records include complaint logs documenting received complaints and their resolutions, training records with attendance and curriculum details and demographic analyses collected during outreach and engagement efforts.
- j. The unit coordinates with Caltrans and FHWA during compliance reviews and audits.