

ANTIOCH CALIFORNIA

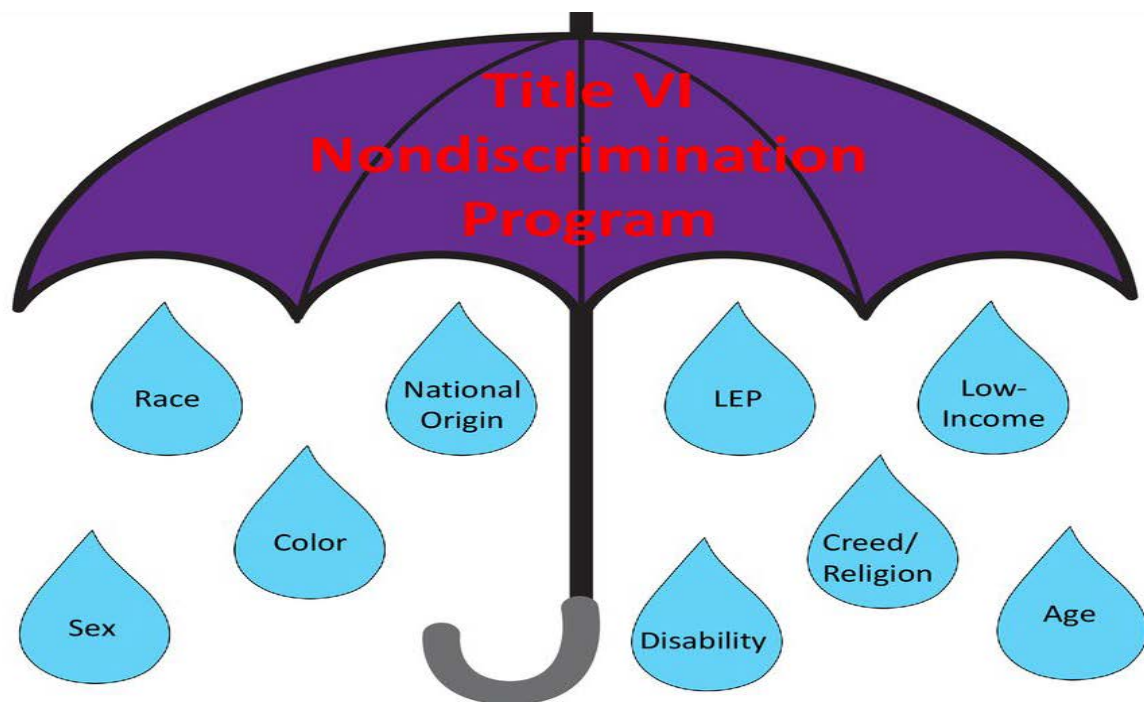
Public Works' Programs

Title VI – Civil Rights Act

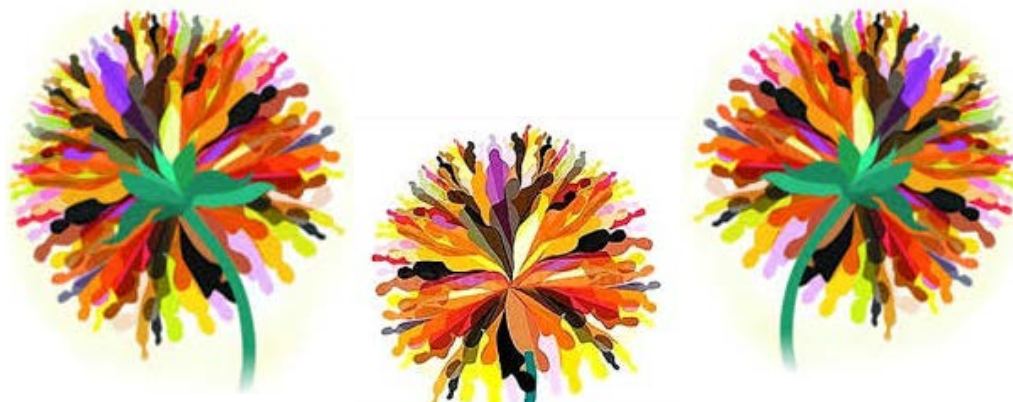
Implementation Plan

2019





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**City of Antioch
ADA/504/Title VI Coordinator
1201 W. 4th St, Antioch CA 94509
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City of Antioch Equal Opportunity Non-Discrimination Policy

It is the policy of the City of Antioch to provide equal opportunity for all qualified persons, regardless of sex, race, color, ancestry, religion, national origin, ethnicity, age (40 and over), disability, sexual orientation, marital status, medical condition, or any other category protected by state or federal employment law. Our commitment includes ensuring a non-discriminatory workplace where individuals are valued for their differences, as well as for their similarities. The City of Antioch will not retaliate against any individual or group for exercising their rights.

Responsibility for the implementation of the City's Equal Employment Opportunity Non-Discrimination Policy rests with the Director of Human Resources. However, all department heads are responsible for carrying out this policy within their department.



City of Antioch Non-Discrimination Statement

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

No person shall be excluded from participation in, or be denied the benefits of, or be subjected to, discrimination on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity, for any program, whether the program receives federal financial assistance or not. Federal financial assistance includes funding from the U.S. Department of Transportation (DOT) for Public Works Department programs, the U.S. Department of Housing and Urban Development (HUD) for Community Development Department programs, the U.S. Department of Justice (DOJ) for Antioch Police Department programs, and other federal funding sources that may be applicable now or in the future.



The City of Antioch Public Works Department is committed to complying with Title VI requirements for all programs and services delivered to the public.

Introduction

The City of Antioch, incorporated in 1872, is a municipal government agency. The City Public Works Department provides a variety of essential public services to the community, including maintenance service to Antioch's roads, parks, marina, open spaces, flood control areas, water and sewer lines as well as providing safe potable water to residents through water distribution and treatment services.

Antioch and the Public Works, Community Development, and Police Departments strive to deliver projects, programs, and services in a socially and environmentally responsible manner that promotes the long-term health, sustainability, and well-being of our community.

The City is a recipient of funding from a variety of federal funding programs, includes funding from the U.S. Department of Transportation (DOT) for Public Works Department programs, the U.S. Department of Housing and Urban Development (HUD) for Community Development Department programs, the U.S. Department of Justice (DOJ) for Antioch Police Department programs, and other federal funding sources that may be applicable now or in the future.

While the City does not provide public transportation services, the City has a Joint Powers Authority (JPA) with TriDelta Transit. The City receives federal funds for capital projects to build and maintain its infrastructure, including gas tax, Road Maintenance and Rehabilitation Program (RMRP), One Bay Area Grant (OBAG), and others. The City also is an entitlement jurisdiction for HUD Community Development Block Grant (CDBG) and other HUD funding.

As a recipient of these federal funding sources, the City is required to comply with Title VI of the Civil Rights Act of 1964 (Title VI). This Act is the focal point of nondiscrimination law, and it prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving Federal financial assistance. Through the years, the Department of Justice expanded Title VI and added the following discrimination categories: age, sex, creed,

low-income and minority communities, disadvantaged business enterprises, and limited English speakers.

The City of Antioch, including the Public Works Department, is committed to complying with Title VI requirements for all program and services delivered to the public. This implementation plan serves as a guide to, and reflection of, the City's commitment to preserving civil rights for all individuals and group benefactors of Public Works and other federally funded programs and services.

This Implementation Plan is a general overview of how the Public Works Department will:

- Handle a Title VI complaint
- Engage in public participation
- Provide services to Limited English Proficiency populations
- Train employees and managers in recognizing Title VI situations
- Increase local and small business partnerships, and more



Policies and Regulations

Title VI of the Civil Rights Act of 1964. Title VI states that:

“No person shall be excluded, on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity, from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” (42 USC 2000d, as implemented through 23 CFR 200.9 and 49 CFR 21)

The National Environmental Policy Act of 1969 (NEPA). This Act addresses both social and economic impacts of environmental justice, placing importance on providing “all Americans” with safe, healthy, and productive surroundings. The policy assures that all branches of government give prior consideration to the environment. NEPA requirements are invoked for all proposed federally funded projects and activities.

The California Environmental Quality Act of 1970 (CEQA). This Act requires state and local agencies to identify and, where feasible, avoid or mitigate the significant impacts of their actions. In addressing environmental justice, projects are to consider potentially significant environment impacts on communities already burdened with pollution.

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.). Prohibits discrimination on the basis of sex by recipients and sub-recipients of federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Prohibits discrimination on the basis of disability by recipients and sub-recipients of federal financial assistance.

The Age Discrimination Act of 1975 (Section 6101-6107, Title 42 U.S.C.). Prohibits discrimination on the basis of age by recipients and sub-recipients of federal financial assistance.

The Civil Rights Restoration Act of 1987 (Public Law 200-209). Clarifies that the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973 was to apply the non-discrimination statutes to **all** programs and activities of federal-aid recipients, sub-recipients, contractors and vendors, **whether all such programs are federally assisted or not.**

The Americans with Disabilities Act of 1990 (ADA). The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA is divided into five titles (or sections) that relate to different areas of public life.

Title I – Employment - Helps people with disabilities access the same employment opportunities and benefits available to people without disabilities; applies to employers with 15 or more employees; requires employers to provide reasonable accommodations to qualified applicants or employees. A “reasonable accommodation” is a change that accommodates employees with disabilities so they can do the job without causing the employer “undue hardship” (too much difficulty or expense); defines disability, establishes guidelines for the reasonable accommodation process, and addresses medical examinations and inquiries; Regulated and enforced by the U.S. Equal Employment Opportunity Commission. <http://www.eeoc.gov/laws/types/disability.cfm>(link is external)

Title II - Public Services: State and Local Government - Prohibits discrimination on the basis of disability by “public entities” such as state and local government agencies; requires public entities to make their programs, services and activities accessible to individuals with disabilities; outlines requirements for self-evaluation and planning; making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination; identifying architectural barriers; and communicating effectively with people with hearing, vision and speech disabilities; regulated and enforced by the U.S. Department of Justice. <http://www.ada.gov>(link is external)

Title III - Public Accommodations and Services Operated by Private Entities - Prohibits places of public accommodation from discriminating against individuals with disabilities. Public accommodations include privately owned, leased or operated facilities like hotels, restaurants, retail merchants, doctor’s offices, golf courses, private schools, day care centers, health clubs, sports stadiums, movie theaters, and so on; sets the minimum standards for accessibility for alterations and new construction of commercial facilities and privately owned public accommodations. It also requires public accommodations to remove barriers in existing buildings where it is easy to do so without much difficulty or expense; directs businesses to make “reasonable modifications” to their usual ways of doing things when serving people with disabilities; requires that businesses take steps necessary to communicate effectively with customers with vision, hearing, and speech disabilities; regulated and enforced by the U.S. Department of Justice. <http://www.ada.gov>(link is external)

Title IV – Telecommunications - Requires telephone and Internet companies to provide a nationwide system of interstate and intrastate telecommunications relay services that allows individuals with hearing or speech disabilities to communicate over the telephone. Requires closed captioning of federally funded public service announcements; Regulated by the Federal Communication Commission. <http://www.fcc.gov>(link is external)

Title V - Miscellaneous Provisions - Contains a variety of provisions relating to the ADA as a whole, including its relationship to other laws, state immunity, its impact on insurance providers and benefits, prohibition against retaliation and coercion, illegal use of drugs, and attorney’s fees; provides a list of certain conditions that are not considered disabilities.

Transportation - Public Transportation offered by a state or local government is covered by Title II of the ADA. Publicly funded transportation includes, but is not limited to, bus and passenger train (rail) service. Rail service includes subways (rapid rail), light rail, commuter rail, and Amtrak. If transportation is offered by a private company, it is covered by Title III. Privately funded transportation includes, but is not limited to, taxicabs, airport shuttles, intercity bus companies, such as Greyhound, and hotel-provided transportation. The U.S. Department of Transportation, Federal Transit Administration releases information, guidance and regulations on transportation and the ADA. <http://www.fta.dot.gov/ada>

Executive Order 12898 (issued February 11, 1994). Addresses Environmental Justice regarding minority and low-income populations and requires agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

Department of Transportation Order 5610.2(a) (issued April 15, 1997). Expands Executive Order 12898 to include all policies, programs and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Federal Aviation Administration (FAA) or other Department of Transportation (DOT) components.

Executive Order 13166 (issued August 16, 2000). Addresses improved access to services for persons with limited English proficiency. Agencies are directed to evaluate services provided and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the services provided consistent with, and without unduly burdening, the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to program, services, and information to their LEP applicants and beneficiaries **free of charge**.

Title 49 Code of Federal Regulations Part 23. Includes requirements for preventing discrimination in the award and performance of any concession agreement, management contract or subcontract, purchase or lease agreement, or other agreement covered herein.

Title 49 Code of Federal Regulations Part 26. Addresses the participation of Disadvantaged Business Enterprises (DBEs) in DOT Financial Assistance Programs by: 1) ensuring nondiscrimination in the award and administration of DOT contracts; 2) creating a level playing field for DBEs to compete fairly for contracts; 3) ensuring that the DOT DBE program is tailored according to applicable law; 4) ensure that only DBE firms fully meeting eligibility standards are eligible to participate; 5) helping remove barriers for DBE participation in DOT-assisted contracts; 6) promoting the use of DBEs in all types of federally assisted contracts and procurement activities; 7) assisting the development of firms that can compete successfully outside of the DBE program; and 8) providing appropriate flexibility in

creating and providing opportunities for DBEs, for those receiving federal financial assistance.

The broader application of nondiscrimination law is also found in other statutes, regulations and Executive Orders. Section 324 of the Federal-Aid Highway Act of 1973 prohibits discrimination based on sex. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 prohibits unfair and inequitable treatment of persons as a result of projects that are undertaken with Federal financial assistance. The list above is not, by any means, a comprehensive list of all federal and state actions that affect the civil rights of all residents.

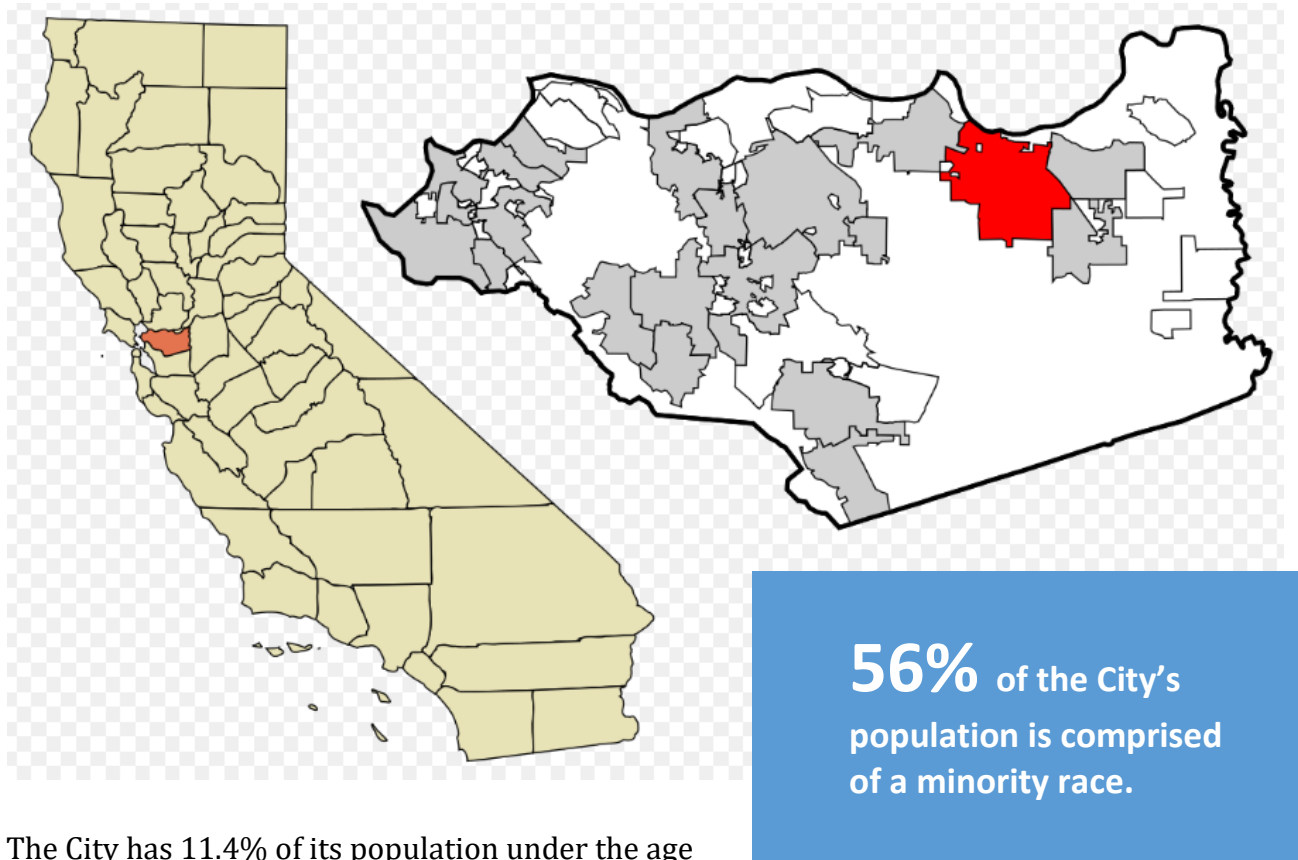
Title VI and the above-mentioned laws, regulations and orders have broad applicability and reach. The City understands that issues Title VI, ADA, and other equity issues may arise during any phase of a Federal-aid program with potentially far-reaching consequences, and decisions can affect the lives of our community.

In addition to this Title VI Implementation Plan, the City of Antioch has a Citizen Participation Plan, Language Assistance Plan, and Residential Anti-Displacement and Relocation Assistance Plan which is updated every 2.5 years and was last approved by City Council in July 2017.



City Overview and Demographics

The City of Antioch is located in East Contra Costa County and is the second largest city in the County. Antioch is located in the East Bay region of the San Francisco Bay Area, with a city population of slightly over 110,000 people. The City is situated along the San Joaquin-Sacramento River Delta at the north.



The City has 11.4% of its population under the age of 65 having a disability, which is significantly higher than the County at 7.5%, and the USA at 8.7%. The City also has a higher percentage of persons living below the federal poverty line, with 14.6% in poverty compared to 9.10% in Contra Costa County and 12.3% in the USA.

The City of Antioch is very ethnically diverse with 56% of residents comprised of a minority race, compared to 34.5% minority population in Contra Costa County, and 23.5% minority population in the United States as a whole.

Antioch also continues to become more linguistically diverse with each year. Data in Table 1 shows that 21.9% of Antioch residents are foreign born persons, and almost 35% of residents speak a language other than English at home. The major language other than English spoken at home is Spanish, with 21.1% of persons speaking this language. Of the 21,324 Spanish speakers, 39.4% of 8,400 people indicate that they speak English less than “very well” and are therefore identified as being of Limited English Proficiency (LEP).

The City's Limited English Proficiency (LEP) Language Assistance Plan contains more data on this subject, and a complete demographic profile can be found in the 2020-25 Analysis of Impediments to Fair Housing Choice, the draft 2020-25 Consolidated Plan, and the 2015-20 Consolidated Plan.

According to the data, Spanish is the only language that rises to the threshold of being "frequently encountered." The City provides language assistance and translates materials into Spanish. The City also provides access to language assistance for an LEP resident that is not part of the "frequently encountered" language groups.

Table 1 – Demographic Data			
Fact	Antioch	Contra Costa County	United States
Population estimates, July 1, 2018, (V2018)	111,535	1,150,215	327,167,434
Population, Census, April 1, 2010	102,372	1,049,025	308,745,538
White alone, percent	44.00%	65.50%	76.50%
Black or African American alone, percent	20.10%	9.50%	13.40%
American Indian and Alaska Native alone, percent	0.80%	1.00%	1.30%
Asian alone, percent	10.90%	18.00%	5.90%
Native Hawaiian and Other Pacific Islander alone, percent	1.00%	0.60%	0.20%
Two or More Races, percent	9.00%	5.30%	2.70%
Hispanic or Latino, percent	33.30%	25.80%	18.30%
White alone, not Hispanic or Latino, percent	29.70%	43.20%	60.40%
Foreign born persons, percent, 2013-2017	21.90%	24.70%	13.40%
Language other than English spoken at home, percent of persons age 5 years+, 2013-2017	34.90%	34.80%	21.30%
With a disability, under age 65 years, percent, 2013-2017	11.40%	7.50%	8.70%
Persons in poverty, percent	14.60%	9.10%	12.30%

Source: U.S. Census Bureau QuickFacts, Population Estimates July 1, 2018 (V2018)

Title VI Implementation

Title VI Coordinator Responsibilities

The Public Works' Title VI Coordinator is responsible for the overall Title VI program implementation, and performs the lead role in the development and implementation of the Title VI program, coordinating across each Public Works division and throughout all City Departments. The Title VI Coordinator provides guidance and technical assistance on Title VI matters, and has overall program responsibility for preparing reports and developing program procedures, which include:

- Promptly processing and resolving Title VI complaints
- Collecting demographic data (race, ethnicity, national origin, sex, age, and disability) of participants in and beneficiaries of the Department's Federal aid programs, activities and services.
- Promptly resolving areas of deficiency
- Conducting periodic Title VI audits
- Ensuring that Title VI requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination
- Providing an annual report of Departmental Title VI accomplishments and goals.
- Coordinating Title VI information for public dissemination, where appropriate, in both English and Spanish (and other languages upon request.)

Title VI Coordinator

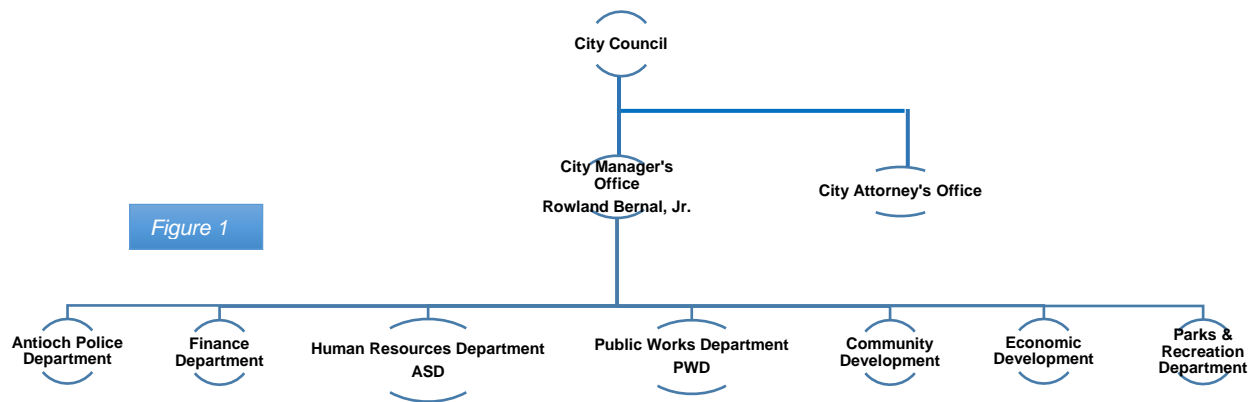
The Public Works Director/City Engineer is the ADA/504/Title VI Coordinator for the City of Antioch. Questions, concerns, complaints or requests for additional information or reasonable accommodation, and admission or access to, or operations of its programs, services, or activities at City facilities or rights-of-way may be forwarded to the City's ADA/504/Title VI Coordinator.

City of Antioch
ADA/504/Title VI Coordinator
1201 W. 4th St, Antioch CA 94509
Voice/ Teléfono: (925) 779-6950 TTY: 711
Email/ Correo electrónico: publicworks@ci.antioch.ca.us

Nickie Mastay, Administrative Services Director, handles all employment related Title VI issues. Any employee or applicant for employment who believes s/he has been aggrieved by any unlawful discriminatory practice or adverse impact under Title VI may file a complaint with the ADA/504/Title VI Coordinator, or with:

City of Antioch
Nickie Mastay, Administrative Services Director (ASD)
P.O. Box 5007, Antioch, CA 94531
Voice/ Teléfono: (925) 779-7020
Email/ Correo electrónico: nmastay@ci.antioch.ca.us

Both the ADA/504/Title VI Coordinator and Administrative Services Director have easy access to the head of the agency, Rowland Bernal, Jr., City Manager for the City of Antioch. Organization chart depicted in Figure 1:



Title VI Requirements

The City and Public Works department has a range of procedures to meet the general requirements of Title VI. They include the following:

- Posting Title VI notifications at public counters, on the City's website, and at other locations as identified in both English and Spanish.
- Publishing brochures in both English and Spanish
- Addressing and filing Title VI discrimination complaints when they occur
- Training staff on Title VI, Section 504, and ADA law and requirements
- Providing access to LEP populations
- Providing information and outreach to obtain involvement from Disadvantaged Business Enterprises.
- Meeting environmental justice regulations
- Adhering to service standards.

Notice of Rights

The City and Public Works will display the "Notice of Rights" for public view at Public Works Department headquarters located at 1201 West 4th Street, at the CIP office located in City

Hall at 200 H. St., and on the City's website for the Public Works Department. The notice states that Public Works will comply with Title VI and ensures that no person on the grounds of race, color, age, disability, gender, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs, activities or services. Examples of Public Works' Notice to the Public are in Appendix A.

Complaint Procedures

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI has a right to file a formal complaint. Any such complaint must be filed in writing with the Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory action. The law prohibits intimidation or retaliation of any kind.

Complaint forms are available at Public Works public counters and online. Example of the complaint form is included under Appendix B. Complaints must be filed in writing and should be directed to:

City of Antioch
ADA/504/Title VI Coordinator
1201 W. 4th St, Antioch CA 94509
Voice/ Teléfono: (925) 779-6950 TTY: 711
Email/ Correo electrónico: publicworks@ci.antioch.ca.us

Complainants may submit their complaint form to Public Works or to an external federal agency, such as the FHWA and FTA. However, should a complaint be filed with Public Works and the federal agency simultaneously, the federal complaint will supersede Public Works' complaint and Public Works' complaint procedures will be suspended pending the federal agency's findings. Every effort will be made to obtain a timely resolution of complaints.

External federal agencies with which a complaint can be filed include (but not limited to):

Caltrans Office of Business and Economic Opportunity
1823 14th Street, Sacramento, CA 95811 (916) 324-8379

Federal Transit Administration Civil Rights Division
1200 New Jersey Avenue SE, Washington, DC 20590.

Federal Highway Administration Civil Rights Division
1200 New Jersey Avenue, S.E., 8th Floor E81-314 Washington, DC 20590

The following procedures will be followed to investigate formal Title VI complaints:

1. The Complaints must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where complainant is unable or incapable of providing written statement, a verbal

complaint may be made. The investigator assigned to the case will interview the complainant and assist the person in converting verbal complaints into writing. All complaints must, however, be signed by the complainant or his/her representative.

- b. Include 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, or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and State law requires complaints be filed within 180 days of the alleged incident.
2. Within 14 business days of receiving the complaint, Public Works Title VI Coordinator will determine its jurisdiction, sufficiency, need for additional information, and investigate the merit of the complaint. The complainant will receive an acknowledgement letter informing him/her whether Public Works has accepted or rejected the complaint.
3. Once Public Works Title VI Coordinator approves the complaint for investigation, the complainant will receive a complaint number and the complaint will be logged identifying: complainant's name; factual allegations; and alleged harm ; race color and national origin.
4. If more information is needed to evaluate the claim, Public Works may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Public Works Title VI Coordinator. If the coordinator is not contacted by the complainant or does not receive additional information within 10 business days, Public Works may terminate the investigation and close the complaint.
5. In cases where Public Works investigates the complaint, within 90 calendar days of the complaint, the investigator will issue either: 1) a closure letter, or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint will be closed. A LOF summarizes the allegations and informs the complainant that Public Works found the complaint to have merit and it will take appropriate corrective action to remedy the matter.
6. If the complainant is unsatisfied with the decision, he/she may file an appeal with the appropriate federal agency for their decision.
7. Public Works will maintain a list of Title VI complaints it receives.

Public Participation Plan

Public Works is committed to ensuring that projects, programs and services delivered by the Department reflect the opinions of the residents of the City. The City is sensitive to the various demographic backgrounds of those who live in Antioch. Public Works has prepared a Public Participation Plan (PPP) for use by any division in the City to promote public involvement in the planning and decision-making process of projects, programs and services. The PPP is included under Appendix C.

Limited English Proficiency Plan

To comply with federal requirements, the City developed a Limited English Proficiency (LEP) Language Assistance Plan (LAP) for use by any division to address the public's language needs. The LAP outlines how to identify reasonable steps for providing language assistance to LEP residents who wish to access services provided by Public Works and other departments in the City. The LAP also identifies language assistance needs, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The LAP is included under Appendix D.

To prepare the Plan, the City followed the Four Factor Analysis:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the programs, activities, or services.
3. The nature and importance of the program, activity, or service provided by Public Works to the LEP population.
4. The resources available to Public Works and overall cost to provide LEP assistance.

Table 2 contains data from the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (the most recent data available) which shows the languages spoken by residents of Antioch, and the level of English proficiency.

The primary language other than English spoken at home by Antioch residents is Spanish, with 21.1% of persons speaking this language. Of the 21,324 Spanish speakers, 39.4% of 8,400 people indicate that they speak English less than "very well" and are therefore identified as being of Limited English Proficiency (LEP). According to the data, Spanish is the only language that rises to the threshold of being "frequently encountered."

The City understands the demographic and language needs of its residents and businesses. City staff are available with language certification to provide translation services at the public counter, especially in the most frequently encountered language of Spanish. The City also provides access to language assistance for an LEP resident that is not part of the "frequently encountered" language groups.

Table 2 - Languages Spoken and Level of English Proficiency
In descending order by those who speak English "Less than Very Well"

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates	Antioch		Speaks English			
	Estimate	% of Total Population	Very Well	% of Language Speakers	Less than Very Well	% of Language Speakers
Total:	101,269					
Speak only English	66,878	66.0%				
Spanish or Spanish Creole	21,324	21.1%	12,924	60.6%	8,400	39.4%
Chinese	2,000	2.0%	722	36.1%	1,278	63.9%
Tagalog	4,371	4.3%	3,119	71.4%	1,252	28.6%
Persian:	881	0.9%	492	55.8%	389	44.2%
African languages	990	1.0%	686	69.3%	304	30.7%
Other Indic languages	438	0.4%	248	56.6%	190	43.4%
Vietnamese	352	0.3%	162	46.0%	190	54.0%
Hindi	621	0.6%	490	78.9%	131	21.1%
Arabic	250	0.2%	123	49.2%	127	50.8%
Other Pacific Island languages	371	0.4%	268	72.2%	103	27.8%
Japanese	207	0.2%	148	71.5%	59	28.5%
Hmong	123	0.1%	67	54.5%	56	45.5%
Gujarati	170	0.2%	120	70.6%	50	29.4%
Polish	105	0.1%	56	53.3%	49	46.7%
Other Asian languages	158	0.2%	113	71.5%	45	28.5%
Serbo-Croatian	192	0.2%	152	79.2%	40	20.8%
Korean	76	0.1%	39	51.3%	37	48.7%
Thai	91	0.1%	56	61.5%	35	38.5%
Mon-Khmer, Cambodian	45	0.0%	15	33.3%	30	66.7%
Armenian	69	0.1%	40	58.0%	29	42.0%
Italian	159	0.2%	135	84.9%	24	15.1%
Russian	242	0.2%	219	90.5%	23	9.5%
Portuguese or Portuguese Creole	182	0.2%	163	89.6%	19	10.4%
Other Indo-European languages	111	0.1%	97	87.4%	14	12.6%
French (incl. Patois, Cajun)	369	0.4%	360	97.6%	9	2.4%
German	182	0.2%	173	95.1%	9	4.9%
French Creole	40	0.0%	40	100.0%	0	0.0%
Other West Germanic languages	31	0.0%	31	100.0%	0	0.0%
Scandinavian languages	32	0.0%	32	100.0%	0	0.0%
Greek	19	0.0%	19	100.0%	0	0.0%
Urdu	114	0.1%	114	100.0%	0	0.0%
Navajo	13	0.0%	13	100.0%	0	0.0%
Hebrew	46	0.0%	46	100.0%	0	0.0%

The City's Language Assistance Plan contains more data on this subject, and a complete demographic profile can be found in the 2020-25 Analysis of Impediments to Fair Housing Choice, the draft 2020-25 Consolidated Plan, and the 2015-20 Consolidated Plan, required by the U.S. Department of Housing and Urban Development (HUD).

Training

The City and Public Works Department will provide Title VI training to employees, managers, contractors, and any individuals who come into contact with Title VI related functions and activities. These trainings are offered at minimum every two years. Trainings will be offered online or through an instructor-led class. The following components will be covered to ensure compliance:

1. Review of the Public Works' Title VI Policy, PPP and LAP Plans
2. Types of language assistance services offered to the public
3. How to handle a potential complaint
4. Where to seek assistance for Title VI questions and concerns
5. Some employees will be provided training on DBE and Americans with Disabilities Act compliance, as necessary

Additional resources are provided on Public Works' website to enhance the learning objectives, including resources located Limited English Proficiency website <https://www.lep.gov/video/video.html>. Other resources include materials on how to interact with persons who have a variety of disabilities, and how to enhance communication with persons who are of limited English proficiency. The City also uses consultant resources for additional support.

Disadvantaged Business Enterprise

The City is committed to increasing the participation of Disadvantaged Business Enterprises (DBEs) in construction projects and other procurement activities and ensuring nondiscrimination in the award and administration of contracts. Qualified DBEs are minority or women owned businesses, including firms owned by disadvantaged and disabled veterans. The City partners with Contra Costa County Public Works to share its larger listing of Small Business Enterprise (SBE), Disadvantaged Business Enterprise (DBE), Disabled Veteran Business Enterprise (DVBE), Minority Business Enterprise (MBE), and Women Business Enterprise businesses to cast a wider net when soliciting services, supplies and contracts.

A DBE is a for-profit small business which is at least 51% owned by one or more socially and economically disadvantaged individuals.

Environmental Justice

In accordance with Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”), the City and Public Works Department will identify and address the environmental effects of programs, policies, and activities on minority and low-income populations. It will consider demographic data in 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 data analysis enable the City to develop measures to mitigate any potential adverse effects on minority and low-income populations. Environmental Justice compliance is contained in the PPP under Appendix C.

Title VI Construction Contract Provisions

Public Works will include the provisions indicated in the “Administering Agency – State Agreement for Federal-Aid Projects Master Agreement (Appendix A of Exhibit B) in the Local Assistance Program Manual (LAPM) in contracts and agreements, where applicable, between the Department and contractors.

Federal aid construction contracts currently include provisions which require compliance with Title VI. The specific contract provision language is included in the FHWA Form 1273 that is physically inserted into the federal aid construction contract.

The “Local Agency Construction Contract Administration Checklist (Exhibit 15-B of the LAPM) is completed by the Resident Engineer. The checklist assists in administering federal-aid highway construction projects. It also 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. Public Works will continue to submit Exhibit 15-B, along with the Award Package, shortly after award of the construction contract (see Chapter 15, “Advertise and Award Project” of the LAPM).

Annual Work Plan

The Annual Work Plan will guide updates to the Title VI Plan, which shall be updated every three years. Public Works will produce an annual report of Title VI accomplishments and upcoming goals, including an update to the Title VI Program that reflects organization policy changes, and a Work Plan outlining Title VI monitoring and review activities planned for the upcoming City fiscal Year.

1. Discussion and attachments pertaining to general Title VI requirements.
 - a. Title VI Notice to Public
 - b. Title VI Complaint Procedures
 - c. List of Investigations, Complaints, or Lawsuits
 - d. Public Participation Plan and participation

- e. Language Assistance Plan and assistance provided
 - f. Training provided and conducted
 - g. Language translation services provided
 - h. Signage review and updates
 - i. Update of demographic and community statistics
 - j. Sub-recipient Monitoring
 - k. Construction Projects
 - l. Correspondence with federal agencies
 - m. Additional Information upon Request
2. All other required submittals.



Appendices

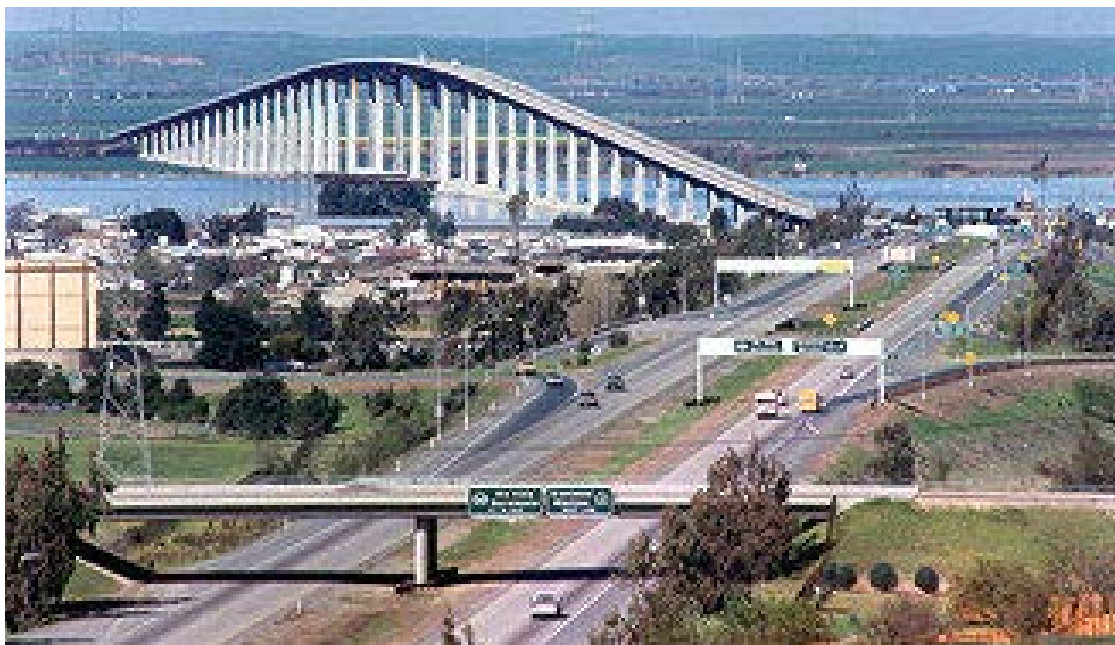
Appendix A Notice to the Public

Appendix B Complaint Form

Appendix C Public Participation Plan

Appendix D Limited English Proficiency Plan

Appendix E Additional Title VI Legislation and Regulatory Requirements



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

Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

Any person who believes that they have been excluded from, denied the benefits of, or been subjected to discrimination may file a written complaint with the City of Antioch. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident. The law prohibits intimidation or retaliation of any kind.

To request additional information on the City of Antioch's nondiscrimination obligations, to file a Title VI Complaint, or to obtain assistance in filling out the form or other reasonable accommodations, see contact information below.



For the California Relay Service, dial 7-1-1.



For individuals with sensory disabilities,
this document can be made available in alternative formats.



For individuals who speak other languages,
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To obtain a copy of this document in an alternative format, please call or write:

**City of Antioch
ADA/504/Title VI Coordinator
1201 W. 4th St, Antioch CA 94509
Voice/ Teléfono: (925) 779-6950 TTY: 711
Email/ Correo electrónico: publicworks@ci.antioch.ca.us**

Sus derechos bajo el Título VI de la Ley de Derechos Cívicos de 1964

El Título VI de la Ley de Derechos Civiles de 1964 exige que ninguna persona en los Estados Unidos, por justificación de raza, color u origen nacional, se le nieguen los beneficios de, o sea objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera. La Orden Ejecutiva Presidencial 12898 aborda la justicia ambiental en las poblaciones minoritarias y de bajos ingresos. La Orden Ejecutiva Presidencial 13166 dirige los servicios a aquellas personas con dominio limitado del inglés.

Cualquier persona que crea que ha sido excluida, negada a los beneficios de, o ha sido objeto de discriminación puede presentar una queja por escrito ante la ciudad de Antioquía. La ley federal y estatal requiere que las quejas se presenten dentro de los ciento ochenta (180) días calendario del último incidente presunto. La ley prohíbe la intimidación o represalia de cualquier tipo.

Solicitar información adicional sobre las obligaciones de no discriminación de la ciudad de Antioquía, presentar una queja del Título VI, o para obtener ayuda para llenar el formulario u otras adaptaciones razonables, consulte la información de contacto a continuación.



Para el Servicio de Retransmisión de California, marque 7-1-1



Para personas con discapacidades sensoriales,
este documento puede estar disponible en formatos alternativos.

Para las personas que hablan otros idiomas,
este documento se puede traducir.



Para obtener una copia de este documento en un formato alternativo, llame o escriba:

City of Antioch
ADA/504/Title VI Coordinator
1201 W. 4th St, Antioch CA 94509
Voice/ Teléfono: (925) 779-6950 TTY: 711
Email/ Correo electrónico: publicworks@ci.antioch.ca.us

City of Antioch Complaint / Grievance Form

Title VI and Section 504

The City of Antioch is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services based on race, color, national origin, sex, age, disability, religion, sexual orientation, gender or gender identity. If you need help in completing this form, please contact us. Copies of the form will be provided in alternative formats or translated into Spanish or other languages as needed. To request reasonable accommodation please contact us by calling **925-779-6950** or via Telecommunication Relay Service (TRS) by dialing 7-1-1, or via email at: [**publicworks@ci.antioch.ca.us**](mailto:publicworks@ci.antioch.ca.us)

The City of Antioch CA prohibits retaliation or intimidation against anyone because that individual has either taken action or participated in action to secure rights protected by policies of the City. Please inform the Title VI Coordinator if you feel you were intimidated or experience perceived retaliation in relation to filing this complaint. **NOTE: Title VI complaints must be filed within 180 days from the date of the alleged discrimination.**

Contact Information

Name:		Date of Incident:
Phone:	Alternate Phone:	
Your Street Address, City, State, & Zip Code		
Name(s) of any other persons discriminated against (other than yourself):		
Street Address, City, State & Zip Code of person(s) listed above:		

Complaint Information

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

- ☐ Race ☐ Color ☐ National Origin ☐ Age ☐ Disability ☐ Religion ☐ Gender
☐ Sexual Orientation ☐ Gender Identity ☐ Other _____

Check category that best describes your issue:

- ☐ **Program Access** – trying to get or maintain a City benefit or service because of a disability, or you asked for a reasonable modification of a policy, practice or procedure in order to obtain City benefits or services but were denied one.
- ☐ **Physical Access** –wheelchair ramp needed, braille signage missing, accessible counters are too high for wheelchair users, etc.
- ☐ **Communication Access** –need an interpreter, materials in alternative formats, or other auxiliary aids and services to have equal access to City information & communications.
- ☐ **Online Services** –City online services and websites.
- ☐ **Employment Discrimination** – applying for and accessing City jobs.

Appendix B – Complaint Form

Please check the City department this complaint involves (leave blank if unknown):

- | | | |
|--|---|---|
| <input type="checkbox"/> Administration | <input type="checkbox"/> Economic Development | <input type="checkbox"/> Police |
| <input type="checkbox"/> Animal Services | <input type="checkbox"/> Parks and Recreation | <input type="checkbox"/> Public Works |
| <input type="checkbox"/> Boards & Commissions | <input type="checkbox"/> Finance | <input type="checkbox"/> Not sure/Other _____ |
| <input type="checkbox"/> City Council | <input type="checkbox"/> Human Resources | |
| <input type="checkbox"/> Community Development | <input type="checkbox"/> Information Systems | |

Please describe the problem you encountered. You may attach additional pages:

Do you know the name or position of any of the staff you encountered?

What was the date of the most recent problem? _____

What was the location/address of the problem?

Please state what you think should be done to help in solving this problem:

Have you filed a complaint about this issue with any other federal, state, or local agencies? ☐ Yes ☐ No

If so, list agency(ies) and contact information below:

Agency:	Contact Name:
Street Address, City, State, & Zip Code:	Phone:

Complainant's Signature

Complainant's Name (print)

Date

Please return this completed form to:

City of Antioch ADA/504/Title VI Coordinator, 1201 W. 4th St, Antioch CA 94509
Voice: (925) 779-6950 Email: publicworks@ci.antioch.ca.us TTY: 711

Purpose of the Public Participation Plan (PPP)

The City of Antioch's PPP is intended to provide for and encourage participation in City planning processes by all residents of Antioch, particularly lower- and moderate-income persons, minorities, non-English speaking persons, and persons with disabilities. This plan provides guidelines for involving the public to ensure that all groups are represented, and their needs considered. The City is committed to ensuring that it serves the residents and businesses in Antioch fairly, consistently, and in the most cost-effective and appropriate manner within available resources.

As a recipient of federal funding, the City is required to adhere to Title VI of the Civil Rights Act of 1964, and to integrate the PPP into its Title VI Program. Title VI adherence and integration are required by federal funding from the Department of Transportation, Department of Housing and Urban Development, Department of Justice, and other federal funding sources. Although each funding source may have different planning and reporting requirements, the City's goals to obtain representation and participation by the breadth of its residents remains the same.

Goals and Objectives

The goal of the Public Works Public Participation Plan is to provide a variety of opportunities for the public to engage in planning and decision-making activities. The objectives of the plan are as follows:

1. To plan for meaningful public communication by collecting data and understanding language and other barriers that Antioch residents with limited English proficiency and those with disabilities may face as they attempt to engage City services, including planning activities.
2. To provide general notification for meetings to gather public input in a manner that is understandable to all populations.
3. To hold meetings in locations that are accessible and reasonably welcoming to all residents, including but not limited to those who are minorities, those who have limited proficiency in English language, and those who are of lower income.
4. To utilize a variety of communication methods to capture public input from populations that are not likely to attend or engage in public meetings. This includes taking reasonable steps to provide language assistance to ensure meaningful access to participation by non-English speaking residents of the community.
5. To provide reasonable efforts to ensure continuity of involvement of citizens or citizen organizations throughout all stages of the Programs, including program performance; and
6. To conduct meetings and respond to information requests in a manner consistent with the Ralph M. Brown Act and California Public Records Act.

Identification of Stakeholders

Stakeholders are those individuals who are either directly or indirectly impacted by City plans, programs or projects, especially those that are partially or wholly federally funded. Those individuals who may be adversely affected or who may be denied the benefit of a plan's recommendations are of interest in the identification of specific stakeholders. The City will work to identify stakeholders early in the planning processes to conduct targeted outreach and obtain participation.

Minority Populations

The City of Antioch has a population of over 110,000. Over the past twenty years it has become increasingly ethnically diverse, with 56% of residents comprised of a minority race, compared to 34.5% minority population in Contra Costa County, and 23.5% minority population in the United States as a whole.

Persons under the age of 65 who have a disability comprises 11.4% of Antioch's population, which is significantly higher than the County at 7.5%, and the USA at 8.7%. The City also has a higher percentage of persons living below the federal poverty line, with 14.6% in poverty compared to 9.10% in Contra Costa County and 12.3% in the USA.

Antioch also continues to become more linguistically diverse with each year. Data in Table 1 shows that 21.9% of Antioch residents are foreign born persons, and almost 35% of residents speak a language other than English at home. The major language other than English spoken at home is Spanish, with 21.1% of persons speaking this language. Of the 21,324 Spanish speakers, 39.4% of 8,400 people indicate that they speak English less than "very well" and are therefore identified as being of Limited English Proficiency (LEP).

The City's Limited English Proficiency (LEP) Language Assistance Plan contains more data on this subject, and a complete demographic profile can be found in the 2020-25 Analysis of Impediments to Fair Housing Choice, the draft 2020-25 Consolidated Plan, and the 2015-20 Consolidated Plan.

According to the data, Spanish is the only language that rises to the threshold of being "frequently encountered." The City provides language assistance and translates materials into Spanish. The City also provides access to language assistance for an LEP resident that is not part of the "frequently encountered" language groups.

The City of Antioch will be mindful of the diversity of the City when conducting outreach and public planning processes.

Table 1 – Demographic Data

Fact	Antioch	Contra Costa Cty	United States
Population estimates, July 1, 2018, (V2018)	111,535	1,150,215	327,167,434
Population, Census, April 1, 2010	102,372	1,049,025	308,745,538
White alone, percent	44.00%	65.50%	76.50%
Black or African American alone, percent	20.10%	9.50%	13.40%
American Indian and Alaska Native alone, percent	0.80%	1.00%	1.30%
Asian alone, percent	10.90%	18.00%	5.90%
Native Hawaiian and Other Pacific Islander alone, percent	1.00%	0.60%	0.20%
Two or More Races, percent	9.00%	5.30%	2.70%
Hispanic or Latino, percent	33.30%	25.80%	18.30%
White alone, not Hispanic or Latino, percent	29.70%	43.20%	60.40%
Foreign born persons, percent, 2013-2017	21.90%	24.70%	13.40%
Language other than English spoken at home, percent of persons age 5 years+, 2013-2017	34.90%	34.80%	21.30%
With a disability, under age 65 years, percent, 2013-2017	11.40%	7.50%	8.70%
Persons in poverty, percent	14.60%	9.10%	12.30%

Source: U.S. Census Bureau QuickFacts, Population Estimates July 1, 2018 (V2018)

Limited English Proficiency (LEP) Populations

A person with limited English proficiency is a person who does not speak English as their primary language and has a limited ability to read, write, speak or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). As seen in Table 2, the primary language other than English spoken at home by Antioch residents is Spanish, with 21.1% of persons speaking this language. Of the 21,324 Spanish speakers, 39.4% of 8,400 people indicate that they speak English less than “very well” and are therefore identified as being of Limited English Proficiency.

To help ensure meaningful access to LEP populations and comply with federal requirements, the City developed a Limited English Proficiency Language Assistance Plan (Plan) using the Four Factor Analysis, for use by any division to address the public’s language needs. The Plan outlines how to identify reasonable steps for providing language assistance to LEP residents who wish to access services provided by Public Works and other departments in the City. The Plan also identifies language assistance needs, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

According to the data, Spanish is the only language that rises to the threshold of being “frequently encountered.” The City provides language assistance and translates materials into Spanish. The City also provides access to language assistance for an LEP resident that is not part of the “frequently encountered” language groups.

Table 2 below contains data from the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (the most recent data available) which shows the languages spoken by residents of Antioch, and the level of English proficiency.

Table 2 - Languages Spoken and Level of English Proficiency In descending order by those who speak English "Less than Very Well"						
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates	Antioch		Speaks English			
	Estimate	% of Total Population	Very Well	% of Language Speakers	Less than Very Well	% of Language Speakers
Total:	101,269					
Speak only English	66,878	66.0%				
Spanish or Spanish Creole	21,324	21.1%	12,924	60.6%	8,400	39.4%
Chinese	2,000	2.0%	722	36.1%	1,278	63.9%
Tagalog	4,371	4.3%	3,119	71.4%	1,252	28.6%

The City understands the demographic and specific language needs of the City's residents and businesses. Reasonable efforts will be made to engage LEP populations. This includes such steps as making public notices in Spanish, and other languages upon request, that will provide contact information where individuals can be informed of the affected project or services to provide input and comments. City staff are also available with language certification to provide translation services at the public counter, especially in the most frequently encountered language of Spanish.

The City's Language Assistance Plan contains more data on this subject, and a complete demographic profile can be found in the 2020-25 Analysis of Impediments to Fair Housing Choice, the draft 2020-25 Consolidated Plan, and the 2015-20 Consolidated Plan.

Lower Income Populations

The low-income threshold is defined as households with a per capita income of 80% or less of the area median income. The City annually identifies and maps all lower income census tracts and block groups that meet the low-income threshold issued by the U.S. Department of Housing and Urban Development (HUD). These maps and lists are distributed to relevant City Departments (including Public Works Department) to identify potential impacts to lower income populations when considering projects and programs. See Exhibit A, Maps and Tables.

Lower income populations, especially those residing in lower income areas, will be given reasonable opportunity to provide input on plans and programs to avoid disproportionate harm or lack of benefit.

Environmental Justice

To comply with Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”), Public Works is required to assess the environmental impacts of projects on the community. By factoring in data on demographics, minority, LEP and low-income populations, Public Works can develop measures to mitigate potential adverse effects on these populations.

Public Comment Process

The public has a right and is encouraged to comment and express their opinions during regular City Council meetings held on the first and third Tuesday evenings starting at 7:00 p.m. (see City Calendar for details, as Council is dark at least one meeting in July and December.) The meetings are held at the Council Chambers located at City Hall, 200 H. St., Antioch CA. Council Chambers are handicapped accessible and have assistive devices for those with hearing impairment. For other reasonable accommodations, please contact the City of Antioch ADA/504/Title VI Coordinator, 1201 W. 4th St, Antioch CA 94509, Voice: (925) 779-6950 Email: publicworks@ci.antioch.ca.us TTY: 711.

Outreach Efforts

The City Public Works Department will also provide the public with opportunity to comment at community meetings and through online platforms. Public Work’s staff and/or a contracted Spanish interpreter will attend community meetings to inform residents of Public Works services and provide them with an opportunity to express their input in a language in which they are proficient.

Public Works will engage the community through a variety of potential outreach efforts best targeted to the population to be reached. These may include but are not limited to:

- City website
- City Manager Weekly Newsletter
- Next Door email blasts
- Neighborhood Watch groups
- Social Media, City FaceBook
- Info in Antioch Chamber eblast
- Posting at City Hall
- Advertisement in local newspaper
- Posting in community facilities
- Posters/brochures placed in City departments (i.e. Parks & Recreation
- Advertisement in Senior Center bi-monthly newsletter
- Advertisement in quarterly Recreation Guide
- Posters/brochures placed throughout community
- Posting & partnership with First 5
- Posting & partnership with Libraries in City of Antioch
- Outreach to local communities of faith
- Postings at ethnic markets, businesses

Contact CDBG Administrator for updated mailing and contact lists and ideas.

Complaint Procedures

Any person who believes that they have been excluded from, denied the benefits of, or been subjected to discrimination may file a written complaint with the City of Antioch. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident. The law prohibits intimidation or retaliation of any kind.

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Census Tracts and Block Groups
City of Antioch • Contra Costa County

City Boundary
City of Antioch
City of Pittsburg
City of Brentwood
City of Oakley

Census Tracts
Census Block Groups

Low Income Block Groups
50% or greater low/mod
40% - 50% low/mod
40% - 50% low/mod
40% - 50% low/mod

Scale: 0 10 20 Miles

North Arrow

Block Groups with % of Lower Income (LowMod) Residents, Color Coded to Map

ACS 2015 Block Groups, Released 2/19/19 Sorted in Ascending Order by CT/BG #				
Census Tract	Block Group	Low Mod	Low Mod Univ	Low Mod %
302009	1	1295	3010	43.02%
302009	2	1530	3995	38.30%
303201	1	1805	3600	50.14%
303201	2	1375	3090	44.50%
303201	3	815	4410	18.48%
303203	1	2455	9365	26.21%
305000	1	1040	1495	69.57%
305000	2	940	1085	86.64%
305000	3	220	565	38.94%
305000	4	1375	1820	75.55%
305000	5	1540	1670	92.22%
306002	1	585	1265	46.25%
306002	2	1170	1740	67.24%
306003	1	1065	1505	70.76%
306003	2	840	1970	42.64%
306003	3	1010	1455	69.42%
306004	1	1445	2150	67.21%
306004	2	730	1175	62.13%
307101	1	1300	1955	66.50%
307101	2	600	1230	48.78%
307101	3	325	1165	27.90%
307102	1	975	1090	89.45%
307102	2	1295	1390	93.17%
307102	3	1315	1380	95.29%
307102	4	1160	1520	76.32%
307201	1	1110	1795	61.84%
307201	2	1270	1440	88.19%
307202	1	1420	1595	89.03%
307202	2	535	590	90.68%
307202	3	1880	2020	93.07%
307204	1	665	1205	55.19%
307204	2	625	715	87.41%
307204	3	1290	2230	57.85%
307205	1	680	820	82.93%
307205	2	1865	2600	71.73%
307205	3	470	1145	41.05%

307205	4	895	1725	51.88%
308001	1	765	1395	54.84%
308001	2	1435	2800	51.25%
308001	3	860	1515	56.77%
308001	4	475	1050	45.24%
308002	1	760	2955	25.72%
308002	2	460	1385	33.21%
309000	2	225	600	37.50%
313102	1	1265	2150	58.84%
313102	2	575	1675	34.33%
313103	1	1630	5240	31.11%
355107	1	1410	3755	37.55%
355107	2	450	1335	33.71%
355108	1	1940	4710	41.19%
355108	2	1535	4630	33.15%
355108	3	1890	4040	46.78%
355109	1	1180	3960	29.80%
355109	2	335	540	62.04%
355109	3	1240	3275	37.86%
355110	1	400	2025	19.75%
355110	2	655	1735	37.75%
355111	1	1460	4495	32.48%
355111	2	780	2250	34.67%

Appendix C - Public Participation Plan

ACS 2015 Block Groups, Released 2/19/19 Sorted Descending Order by % Low/Mod				
Census Tract	Block Group	Low Mod	Low Mod Univ	Low Mod %
307102	3	1315	1380	95.29%
307102	2	1295	1390	93.17%
307202	3	1880	2020	93.07%
305000	5	1540	1670	92.22%
307202	2	535	590	90.68%
307102	1	975	1090	89.45%
307202	1	1420	1595	89.03%
307201	2	1270	1440	88.19%
307204	2	625	715	87.41%
305000	2	940	1085	86.64%
307205	1	680	820	82.93%
307102	4	1160	1520	76.32%
305000	4	1375	1820	75.55%
307205	2	1865	2600	71.73%
306003	1	1065	1505	70.76%
305000	1	1040	1495	69.57%
306003	3	1010	1455	69.42%
306002	2	1170	1740	67.24%
306004	1	1445	2150	67.21%
307101	1	1300	1955	66.50%
306004	2	730	1175	62.13%
355109	2	335	540	62.04%
307201	1	1110	1795	61.84%
313102	1	1265	2150	58.84%
307204	3	1290	2230	57.85%
308001	3	860	1515	56.77%
307204	1	665	1205	55.19%
308001	1	765	1395	54.84%
307205	4	895	1725	51.88%
308001	2	1435	2800	51.25%
303201	1	1805	3600	50.14%
307101	2	600	1230	48.78%
355108	3	1890	4040	46.78%
306002	1	585	1265	46.25%
308001	4	475	1050	45.24%
303201	2	1375	3090	44.50%

302009	1	1295	3010	43.02%
306003	2	840	1970	42.64%
355108	1	1940	4710	41.19%
307205	3	470	1145	41.05%
305000	3	220	565	38.94%
302009	2	1530	3995	38.30%
355109	3	1240	3275	37.86%
355110	2	655	1735	37.75%
355107	1	1410	3755	37.55%
309000	2	225	600	37.50%
355111	2	780	2250	34.67%
313102	2	575	1675	34.33%
355107	2	450	1335	33.71%
308002	2	460	1385	33.21%
355108	2	1535	4630	33.15%
355111	1	1460	4495	32.48%
313103	1	1630	5240	31.11%
355109	1	1180	3960	29.80%
307101	3	325	1165	27.90%
303203	1	2455	9365	26.21%
308002	1	760	2955	25.72%
355110	1	400	2025	19.75%
303201	3	815	4410	18.48%

Introduction

In order to better serve Antioch residents, the City of Antioch has developed a Language Assistance Plan (LAP) for use by any division to address the public's language needs. The implementation of the LAP is consistent with Executive Order 13166 (August 11, 2000) to ensure that programs receiving federal financial assistance provide meaningful access to Limited English Proficiency (LEP) persons. Failure to ensure that LEP persons can effectively participate in or benefit from federally assisted programs may violate Title VI of the Civil Rights Act of 1964 that prohibits discrimination based on national origin.

The LAP outlines how to identify reasonable steps for providing language assistance to LEP residents who wish to access services provided by Public Works and other departments in the City. The LAP also identifies language assistance needs, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. Implementation of the LAP enables Antioch to better serve its residents by ensuring access to language assistance for City programs funded with federal funds. Although Antioch may have limited resources at a given time, the LAP ensures that access to language assistance for LEP residents will be provided in some form.

Goals of the LAP

The three major goals of the Antioch LAP are as follows:

1. To provide meaningful access for Antioch's LEP residents through the provision of free language assistance for the CDBG program;
2. To provide an appropriate means to ensure the involvement of LEP residents that are most likely to be affected by the programs and to ensure the continuity of their involvement;
3. To ensure that the City's CDBG staff will assist the City's LEP population in obtaining the necessary services and/or assistance requested.

Four Factor Analysis

To prepare the Plan, the City followed the Four Factor Analysis, which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the programs, activities, or services.
3. The nature and importance of the program, activity, or service provided by Public Works to the LEP population.
4. The resources available to Public Works and overall cost to provide LEP assistance.

Identification of LEP Populations

Table 2 - Languages Spoken and Level of English Proficiency						
In descending order by those who speak English "Less than Very Well"						
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates	Antioch		Speaks English			
	Estimate	% of Total Population	Very Well	% of Language Speakers	Less than Very Well	% of Language Speakers
Total:	101,269					
Speak only English	66,878	66.0%				
Spanish or Spanish Creole	21,324	21.1%	12,924	60.6%	8,400	39.4%
Chinese	2,000	2.0%	722	36.1%	1,278	63.9%
Tagalog	4,371	4.3%	3,119	71.4%	1,252	28.6%
Persian:	881	0.9%	492	55.8%	389	44.2%
African languages	990	1.0%	686	69.3%	304	30.7%
Other Indic languages	438	0.4%	248	56.6%	190	43.4%
Vietnamese	352	0.3%	162	46.0%	190	54.0%
Hindi	621	0.6%	490	78.9%	131	21.1%
Arabic	250	0.2%	123	49.2%	127	50.8%
Other Pacific Island languages	371	0.4%	268	72.2%	103	27.8%
Japanese	207	0.2%	148	71.5%	59	28.5%
Hmong	123	0.1%	67	54.5%	56	45.5%
Gujarati	170	0.2%	120	70.6%	50	29.4%
Polish	105	0.1%	56	53.3%	49	46.7%
Other Asian languages	158	0.2%	113	71.5%	45	28.5%
Serbo-Croatian	192	0.2%	152	79.2%	40	20.8%
Korean	76	0.1%	39	51.3%	37	48.7%
Thai	91	0.1%	56	61.5%	35	38.5%
Mon-Khmer, Cambodian	45	0.0%	15	33.3%	30	66.7%
Armenian	69	0.1%	40	58.0%	29	42.0%
Italian	159	0.2%	135	84.9%	24	15.1%
Russian	242	0.2%	219	90.5%	23	9.5%
Portuguese or Portuguese Creole	182	0.2%	163	89.6%	19	10.4%
Other Indo-European languages	111	0.1%	97	87.4%	14	12.6%
French (incl. Patois, Cajun)	369	0.4%	360	97.6%	9	2.4%
German	182	0.2%	173	95.1%	9	4.9%
French Creole	40	0.0%	40	100.0%	0	0.0%
Other West Germanic languages	31	0.0%	31	100.0%	0	0.0%
Scandinavian languages	32	0.0%	32	100.0%	0	0.0%
Greek	19	0.0%	19	100.0%	0	0.0%
Urdu	114	0.1%	114	100.0%	0	0.0%
Navajo	13	0.0%	13	100.0%	0	0.0%
Hebrew	46	0.0%	46	100.0%	0	0.0%

Table 2 above contains data from the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (the most recent data available) which shows the languages spoken by residents of Antioch, and the level of English proficiency. A complete demographic profile can be found in the 2020-25 Analysis of Impediments to Fair Housing Choice, the draft 2020-25 Consolidated Plan, and the 2015-20 Consolidated Plan.

The primary language other than English spoken at home by Antioch residents is Spanish, with 21.1% of persons speaking this language. Of the 21,324 Spanish speakers, 39.4% of 8,400 people indicate that they speak English less than “very well” and are therefore identified as being of Limited English Proficiency (LEP).

According to the data, Spanish is the only language that rises to the threshold of being “frequently encountered.” The City provides language assistance and translates materials into Spanish. The City also provides access to language assistance for an LEP resident that is not part of the “frequently encountered” language groups.

Language Assistance Measures

Antioch must provide access to language assistance at no charge to the LEP resident. Depending on the language and nature or importance of a program, service, or activity, the City shall provide access to oral interpretation, written translation, or in some cases, access to both. The City will ensure that access is provided but not limited to the following ways:

- Hiring or providing bilingual staff;
- Contracting with language assistance agencies;
- Accessing language assistance telephone lines; and
- Utilizing community volunteers from community-based organizations.

Critical programs: Provision of Oral Interpretation and Written Translation

Certain programs, services, or activities deemed “critical” warrant the need to provide both oral interpretation and written translation. Each Department must determine which programs are critical and which documents are vital. In most cases, housing and housing related complementary services, including services to homeless populations are viewed as critical programs as they are essential to maintaining quality of life.

All of Antioch’s CDBG subrecipients provide non-housing related programs, services, or activities, as housing activities are funded with Antioch Development Agency (ADA) funds. In most of these cases, subrecipients providing non-housing related programs will not be required to provide the same level of interpretive services as housing or housing-related programs. At the very least, subrecipients of non-housing related programs must provide access to language assistance in some form. The subrecipients’ access to LEP services will be monitored as part of the Consortium’s overall monitoring program of a fiscal year.

Oral Interpretation Assistance: Face-to-Face and Telephone Communication

Face-to-face contact or telephone contact is the most frequent mode of contact with the public or beneficiaries of a program. In most of these cases oral interpretation will be the mode most likely to take place to assist an LEP resident.

In face-to-face contact, staff should follow the following steps to ensure access to language assistance:

- Staff shall notify the LEP resident, to the best of their ability, that language assistance is available to them free of charge and can be arranged for them. A notice stating that free language assistance is available from the City will be posted in the lobby of the Community Development department division lobby in the most “frequently encountered” language of Spanish.
- If the LEP resident is not in any of the “frequently encountered” language groups, the provision of “I Speak” cards shall be presented to the LEP resident to determine what language is appropriate.
- Once the language is determined, staff will arrange language assistance for the LEP person with bilingual staff, language assistance telephone lines, language assistance agencies, or community staff, depending on the nature of assistance needed.

The assistance from a family member or friend is discouraged; however, if the LEP person has a family member or friend that they would like to utilize and they have been notified that there is free assistance available to them, staff must document that free language assistance was offered but the LEP resident elected to utilize a family member or friend.

In situations where precise, complete, and accurate translations of information are critical (i.e. lease agreements, loan documents, legal documents, etc.), the City reserves the right to use a professional interpreter, regardless of whether the LEP individual provides his/her interpreter.

To respond to LEP telephone calls, staff should follow these steps to ensure access to language assistance:

- Staff must, to the best of their ability, try to ascertain the language of the LEP caller. At the very least, staff must ask a “do you speak...” question. Staff should start with the most frequently encountered languages (e.g. “Do you speak Spanish?”).
- If the language can be determined and there is bilingual staff available to assist the caller, staff must inform the LEP caller that there will be an attempt to transfer the call to the bilingual staff and also give the phone number of the bilingual staff member to the LEP resident. If there is knowledge that the bilingual staff member is on leave/vacation, staff shall try to obtain the phone number of the LEP person for the bilingual staff member to call back, or get assistance from an outside interpreter (i.e. language assistance line, existing contract with a language assistance agency, etc.) to assist the LEP caller.

- If there is no bilingual person on staff that can assist the LEP person, staff shall contact an outside language assistance interpreter that the City may have available (i.e. language assistance phone line, interpreter from a language assistance agency on retainer, etc.) and work with the outside interpreter and assist the LEP caller.

Oral Interpretation Assistance: Public Meetings/Hearings

If a significant number of LEP residents are expected to attend a public meeting/hearing, the City shall provide oral interpretation assistance for the meeting. To determine if written translated materials (if any) are also required for the meeting, see section on “Safe Harbor” Threshold below.

Written Translation Assistance of Vital Documents

Vital documents are paper or electronic written materials that contain information that is critical for accessing City programs, services, benefits, or activities; those materials that are directly and substantially related to public safety; or materials that are required by law.

The City shall provide access to written translation of vital documents in City programs. Depending on the nature and importance of the document, it is encouraged that vital documents be translated by a highly competent professional translator as many vital documents contain legal and/or technical concepts. Vital documents include but not limited to:

- Legal or binding documents that participants must execute (i.e. sidewalk repair or grant agreements, loan documents for homeownership, housing applications, rental agreements)
- Information and Outreach materials for City programs, especially housing and housing-related programs, public safety, bicycle safety programs, public health related information (heat or cold weather related shelters, lead-based paint warnings, etc.
- Public Notices of public meetings/hearings*

Note: Not all public notices may warrant written translation. For example. Public Works public notices about projects or programs affecting a targeted area that is home to many people of limited English proficiency should be translated into Spanish. In addition, notices requesting resident input or participation (i.e. Public Works planning meetings, Community Development 5-year Consolidated Plan meetings) should be translated in the most frequently encountered language of Spanish, and the notice should also state that if a resident requires language assistance in the form of oral interpretation, the resident shall notify the City within 72 hours of the meeting/hearing.

“Safe Harbor” Threshold and Written Translation Assistance

In any case in which a language population exceeds 5% of a target population for a program or exceeds 1,000 persons for one language involved in a program, the City shall provide written translation of program materials regardless of the type or nature of the

program. These materials also include public notices of public hearings/ meetings in regards to the specific program, service, or activity.

Training Staff to Provide Access to LEP residents

City staff shall be trained and knowledgeable of the resources available to LEP residents of Antioch. As part of an orientation, new staff shall be instructed of all the necessary steps of providing meaningful access to LEP residents. Staff shall be re-trained on the necessary steps at a minimum of every two years. If there are new requirements or new procedures, staff shall be informed and trained on the new requirements or procedures as soon as possible, but no later than 14 days of the receipt of the new requirements or procedures. All staff having contact with the public shall be trained effectively to work with in-person and/or telephone interpreters.

Providing Notice to LEP Persons

Signage and Outreach - The City's various Developments which receive federal funding, including the Public Works and Community Development departments, shall post signs stating that free language assistance is available from the City. This includes signage in the Community Development lobby on the 2nd floor at 3rd and H Streets, as well as the Public Works 1201 W. 4th Street, Antioch, as these are common areas for public transactions. The signs shall be translated in the most frequently encountered language of Spanish. All outreach materials of the CDBG program shall state that free language assistance services are available. The statement shall be translated in the most frequently encountered language of Spanish.

Newspapers - Depending on the nature and/or importance of the notice and the population of the target audience, notices in local non-English newspapers shall be posted. Unfortunately, Contra Costa has been without a Spanish language newspaper for many years. As this status may change, the City will search for resources to reach Spanish Speaking residents annually. The Hispanic Chamber of Commerce, Contra Costa County is currently active, and may be an effective way to reach minority businesses in the City. For more information, see <http://h5c.org/> or call 415.572.3568 or email info@h5c.org.

Television - Any notice or information televised on local access television shall also state that free language assistance is available in the frequently encountered languages of Spanish. A notice requesting resident input shall be translated in the most frequently encountered language of Spanish and the notice shall also state that if a resident requires language assistance in the form of oral interpretation, the resident shall notify the City within 72 hours of the meeting/hearing.

Other – Spanish speaking residents may more effectively be reached through the following means:

- Social Media – Spanish and English language messages through Next Door notification system has proven effective in the City, as have postings from the City's Facebook and other social media pages.

- Local Spanish Speaking Churches – mail posters and flyers, staff tables
- Antioch public libraries - post information in Spanish, collaborate on hosting meetings
- First Five Centers – post information in Spanish, collaborate on hosting meetings
- Local Spanish language radio station – submit public service announcements
- Schools – partner with them to distribute important notices in English and Spanish

For an updated list of contacts and strategies, contact the CDBG administrator in the Community Development Department.

Monitoring and Updating the LAP

Given that the demographics and the needs of Antioch residents change, the City will periodically monitor and update the LAP. In order to consider changes to demographics, types of services, or other needs, the evaluation of the LAP shall be conducted annually in conjunction with the development of the City's Consolidated Annual Performance and Evaluation Report (CAPER) of the CDBG program. In addition, the LAP shall be updated in conjunction with the development of the HUD-mandated CDBG 5-year Consolidated Plan.

Areas that shall be considered during the evaluation and assessment of the LAP shall include:

- Current LEP populations in the geographic area or population affected/encountered;
- Frequency of encounters with LEP language groups;
- The nature and importance of activities/services/programs to LEP persons;
- The availability of resources, including technological advances and sources of additional resources, and the costs imposed;
- Whether existing assistance is meeting the needs of LEP persons;
- Whether staff knows and understands the LAP and how to implement it; and
- Whether identified sources for assistance are still available and viable.

