



LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT

**Federal Transit Administration  
Title VI Program**

**2023**

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Office of the Secretary  
PO Box 94245 | Baton Rouge, LA 70804-9245  
ph: 225-379-1200 | fx: 225-379-1851

John Bel Edwards, Governor  
Shawn D. Wilson, Ph.D., Secretary

January 31, 2023

Ms. Marisa Appleton, Region VI Civil Rights Officer  
Federal Transit Administration  
Office of Civil Rights  
819 Taylor Street, Room 14A02  
Fort Worth, TX 76102

Re: Louisiana Department of Transportation and Development (LADOTD) (Recipient ID# 1562)  
FTA Title VI Program

Dear Ms. Appleton:

The Louisiana Department of Transportation and Development's Title VI Program is complete and being submitted to FTA as required in the Code of Federal Regulation.

Should you have any questions, please do not hesitate to contact either Paula Roddy at (225) 379-1363 or Michelle Horne at (225) 379-3057.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shawn D. Wilson", with a long horizontal flourish extending to the right.

Shawn D. Wilson, Ph.D.  
Secretary

Attachment (Title VI Program)

## Chapter 1: Policy Statement

### Non-Discrimination Policy Statement (Title VI / ADA / Limited English Proficiency)

The Louisiana Department of Transportation and Development (LADOTD) assures that no person shall on the grounds of race, color, or national origin as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs or activities. LADOTD assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not (inclusive of additional Title VI Authorities and citations).

The Civil Rights Restoration Act of 1987, broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients, and contractor/consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [S.557] March 22, 1988.) In addition, the LADOTD also assures every effort will be made to provide meaningful access to persons that have limited English proficiency, in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

LADOTD will be responsible for initiating and monitoring Title VI activities, preparing required reports and other LADOTD responsibilities as required by 23 Code of Federal Regulation, (CFR) 200 and 49 Code of Federal Regulation 21.

In the event the LADOTD distributes federal aid funds to subrecipients, the recipients will include Title VI language in all written agreements/contracts and will monitor for compliance.



Shawn D. Wilson, Ph.D.  
Secretary, Louisiana Department of  
Transportation and Development

1 / 30 / 23

Date

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **Louisiana Department of Transportation and Development** may file a Title VI complaint by submitting the agency’s Title VI Complaint Form to:

Cynthia H. Douglas, Title VI/ADA Program Manager  
P.O. Box 94245  
Baton Rouge, LA 70804-9245

Telephone Number: (225)379-1923  
Fax Number: (225)379-1865




**Declaración de política de no discriminación (Título VI/ADA /Dominio limitado del inglés)**

El Departamento de Transporte y Desarrollo de Luisiana (LADOTD) asegura que ninguna persona por motivos de raza, color u origen nacional según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y la Ley de Restauración de Derechos Civiles de 1987 (P.L. 100.259 ) ser excluido de la participación en, ser negado los beneficios de, o ser sujeto de otra manera a discriminación bajo cualquier programa o actividad. LADOTD asegura que se hará todo lo posible para garantizar la no discriminación en todos sus programas y actividades, ya sea que esos programas y actividades estén financiados por el gobierno federal o no (incluidas las autoridades y citas adicionales del Título VI).

La Ley de Restauración de los Derechos Civiles de 1987 amplió el alcance de la cobertura del Título VI al expandir la definición de los términos "programas o actividades" para incluir todos los programas o actividades de los beneficiarios de ayuda federal, sub-beneficiarios y contratistas/consultores, ya sean dichos programas y las actividades cuentan con asistencia federal o no (Ley Pública 100259 [S.557] del 22 de marzo de 1988). Además, LADOTD también asegura que se hará todo lo posible para brindar un acceso significativo a las personas que tienen un dominio limitado del inglés, de conformidad con la Orden Ejecutiva 13166, Mejora del acceso a los servicios para personas con dominio limitado del inglés.

LADOTD será responsable de iniciar y monitorear las actividades del Título VI, preparar los informes requeridos y otras responsabilidades de LADOTD según lo exige el Código de Regulaciones Federales 23, (CFR) 200 y 49 Código de Regulaciones Federales 21

En caso de que LADOTD distribuya fondos de ayuda federal a subbeneficiarios, los beneficiarios incluirán el lenguaje del Título VI en todos los acuerdos/contratos escritos y supervisarán el cumplimiento.

  
\_\_\_\_\_  
Shawn D. Wilson, Ph.D.  
Secretary, Louisiana Department of  
Transportation and Development

1/30/23  
\_\_\_\_\_  
Date

Cualquier individuo, grupo de individuos o entidad que crea que ha sido discriminado por motivos de raza, color u origen nacional por parte del Departamento de Transporte y Desarrollo de Louisiana puede presentar una queja del Título VI enviando el Formulario de queja del Título VI de la agencia a:

Cynthia H. Douglas, Gerente del Programa Título VI/ADA  
CORREOS. Caja 94245  
Baton Rouge, LA 70804-9245

Teléfono: (225)379-1923  
Número de fax: (225)379-1865

## **Chapter 2: Overview of Transit Programs**

The Governor designated LADOTD as the agency responsible for administering Federal Transit Administration (FTA) programs. The Public Transportation Section is located in the Office of Planning of the LADOTD. The mission of the Public Transportation Section is to improve public transit in all areas of the State so that Louisiana's citizens may enjoy an adequate level of personal mobility regardless of geographical location, physical limitation or economic status.

The Public Transportation Section is responsible for the overall administration of federal and state public transportation financial assistance through several grant programs:

- Metropolitan Planning Program (Section 5303)
- Statewide Planning and Research Program (Section 5304)
- Enhanced Mobility of Seniors and Persons with Disabilities Program (Section 5310)
- Formula Grants for Rural Areas Program (Section 5311)
- Job Access and Reverse Commute Program (Section 5316)
- Bus and Bus Facilities Formula Grants (Section 5339)
- Parish Transportation Fund Program

The LADOTD Public Transportation Section does not operate any transit services. The Public Transportation Section coordinates with the LADOTD Compliance Section to ensure consistency with the LADOTD Title VI/Nondiscrimination Plan and inclusion of FTA requirements related to Title VI in the LADOTD's overall Civil Rights Programs.

The Public Transportation Regional Program Managers (RPMs) are the first point of contact for agencies to request guidance and technical assistance for Title VI Programs. The RPMs may request technical assistance from the Compliance Section contact for Title VI.

The previously updated LADOTD FTA Title VI Program was submitted to FTA Region VI, via the TrAMS system on January 28, 2020. The document, which is compliant with FTA Circular 4702.1B, was reviewed and comments provided. Comments have been addressed in this update to the current plan that expires March 31, 2023.

The current LADOTD FTA Title VI Program is compliant with FTA Circular 4702.1B and will be submitted in FTA's TrAMS system on or before February 1, 2023. The updated document will be in effect for three years and will expire on March 31, 2023.

This Title VI Program update incorporates changes in policies and procedures based on the most current FTA Circular for Title VI (4702.1B), and the Public Transportation Section State Management Plan (SMP) for Sections 5310, 5311, 5316, and 5339 Grant Programs.

### Chapter 3: Title VI Program Administration

The LADOTD Compliance Section oversees the development and implementation of civil rights programs for LADOTD. The Compliance Section administers the Title VI, Environmental Justice, Limited English Proficiency (LEP), Disadvantage Businesses Enterprise (DBE), Americans with Disabilities Act (ADA), Supportive Services, Contract and Labor Compliance, and On-the-Job Training compliance programs. The Compliance Section works with the other entities within the LADOTD, including the Public Transportation Section, to ensure compliance with civil rights requirements. As shown in the organization chart in Exhibit 1, the Compliance Section has the following key staff:

- The **LADOTD Compliance Program Director** is responsible for supervising, monitoring and evaluating the performance and effectiveness of the various programs as well as federal compliance oversight on Federal Highway Administration (FHWA) funded construction projects and FTA funded projects.
- The **Title VI / ADA Program Manager** is responsible for the development and implementation of the Title VI program. The Program Manger ensures that all entities within LADOTD are compliant with Title VI. Title VI responsibilities are as follows:
  - Process the disposition of Title VI complaints received by LADOTD.
  - Review statistical data collected (race, color, national origin, age, gender, LEP, disabilities, and income levels) of participant in, and beneficiaries of state highway programs, i.e. relocates, impacted citizens, and affected communities. Review Environmental Impact Statements for Title VI and Environmental Justice compliance.
  - Conduct and/or assist in annual Title VI process reviews of program areas, cities, parishes, consultants, contractors, suppliers, universities, planning agencies, and other sub recipients of USDOT federal funds.
  - Review state programs directives in coordination with Title VI Liaisons for program areas and include Title VI language and related requirements.
  - Conduct training programs on Title VI and related statutes for state program officers, civil rights officials, and LADOTD subrecipients of federal funds.
  - Prepare the Title VI Annual Summation Report presenting the accomplishments for the past year and goals for the next year.
  - Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
  - Conduct post-grant approval reviews of state programs and applicants for compliance with Title VI requirements; i.e. highway location, design and relocation, and persons seeking contracts with the state.
  - Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.
  - Provide technical assistance to subrecipients in the development of their Title VI Plan and assurances.

## Chapter 4: Requirement to Provide Title VI Assurances

The Public Transportation Section submitted the FTA Certifications and Assurances in TrAMS on the following dates:

- FY 2020 submitted August 28, 2020
- FY 2021 submitted January 28, 2021
- FY 2022 submitted March 9, 2022

The Public Transportation Section collects Certifications and Assurances (C&A) from sub recipients on an annual basis and are kept in the application file within the Public Transportation Section.

Fiscal Year 2023 C&A have not been released by FTA. Once released, the Public Transportation Section will submit the C&A via TrAMS, FTA's web portal and sub recipient C&As will be collected and filed with the application.

## Chapter 5: Title VI Notice to the Public

For its transit-related programs, LADOTD notifies the public of its rights under Title VI by posting the **Notifying the Public of Rights under Title VI** in English and Spanish. The Title VI Notice to the Public is posted on LADOTD's website, at LADOTD Headquarters, and in subrecipient transit vehicles.

### **Notifying the Public of Rights under Title VI**

- The Louisiana Department of Transportation and Development (LADOTD) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LADOTD.
- For more information on LADOTD's Civil Rights Program and the procedures to file a complaint, please call (225)379-1923; email:Cynthia.douglas@la.gov visit our administrative office at 1201 Capitol Access Road, Baton Rouge, LA 70804. For more information, visit [www.dotd.la.gov](http://www.dotd.la.gov).
- A complainant may file a complaint directly with the Federal Transit Administration (FTA), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TRC, 1200 New Jersey Ave., SE, Washington, DC 20590. Phone: (225)366-4018.
- If information is needed in another language, please contact (225)379-3055.



### **Notificación al Público de los Derechos Garantizados por Título VI**

- El Departamento de Transporte del estado de Louisiana opera sus programas y servicios, sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja con el Departamento de Transporte de Louisiana.
- Para obtener más información sobre el programa de derechos civiles del Departamento de Transporte de Louisiana o para obtener más información sobre los procedimientos para presentar una queja, llame al (225)379-1923; email: [Cynthia.douglas@la.gov](mailto:Cynthia.douglas@la.gov), o visite nuestras oficinas administrativas en 1201 Capitol Access Road, Baton Rouge, LA 70804. Para obtener más información, visite [www.dotd.la.gov](http://www.dotd.la.gov).
- Un demandante puede presentar una queja directamente a la Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Atención: Coordinador del Programa de Título VI, East Building, 5<sup>th</sup> Floor TCR, 1200 New Jersey Ave, SE, Washington, DC 20590. Teléfono: (202)366-4018.
- Si se necesita información en otro idioma, por favor póngase en contacto con (225)379-3055.

## **Chapter 6: Non Discrimination Complaint Procedures**

The **Louisiana Department of Transportation and Development's** Non Discrimination Complaint Procedure (Title VI / ADA) is made available in the following locations:

- Agency website, if available:**
- Hard copy in the central office**
- Upon request to DOTD Title VI Coordinator in the DOTD Compliance Section.**

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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin, disability, sex, age low-income or LEP (Limited English Proficiency) by the **Louisiana Department of Transportation and Development** may file a Title VI/ ADA complaint by completing and submitting the agency's Title VI/ ADA Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the **Louisiana Department of Transportation and Development's** Compliance Programs Office no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Louisiana Department of Transportation and Development's** Title VI/ADA Coordinator will review it to determine if our office has jurisdiction. In cases where the complaint

is against one of LADOTD's subrecipients of federal highway funds or federal transit funds, the Department will assume the jurisdiction and will investigate and adjudicate the case. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Louisiana Department of Transportation and Development's** Title VI/ADA Coordinator has 45 days to investigate the complaint. If more information is needed to resolve the case, the Title VI/ADA Coordinator may contact the complainant.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 180 days after the date of the letter or the LOF to do so. The Title/ADA Coordinator will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

#### **Procedimiento de Queja Titulo VI/ADA**

El formulario de queja del Titulo VI/ADA del **Departamento de Transporte y Desarrollo de Louisiana** esta disponible en las siguientes ubicaciones:

- Pagina web de la agencia
- Copia impresa localizada en la oficina central
- Titulo IV corresponde a la agencia

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Cualquier individuo, grupo de individuos o entidad que crea que ha sido objeto de discriminacion por motivos de raza, color, origen nacional, discapacidad, sexo, edad de bajos ingresos o LEP (dominio limitado del inglés) por el del **Departamento de Transporte y Desarrollo de Louisiana** puede presentar una queja del Titulo VI/ADA al completar y enviar el formulario de queja del Titulo VI/ADA correspondiente a la agencia. Este documento debeni de ser enviado a la direccion indicada en el formulario de queja.

Cualquier individuo que haya presentado una queja o participe en la investigacion de alguna queja no debera ser sujeto a ninguna forma de intimidacion o represalias. Aquel individuo que considere que ha sido sujeto de intimidacion o de represalias puede llenar un formulario de queja para represalias siguiendo el mismo procedimiento que para una queja de discriminacion.

Esta queja debera ser presentada a traves de la Oficina de Programas de Cumplimiento del del **Departamento de Transporte y Desarrollo de Louisiana** en un periodo de no mas de 180 dias despues de lo siguiente:

- 1.- La fecha del presunto acto de discriminacion; o
- 2.- La fecha en la que la persona (s) se percataron del presunto acto de discriminacion; o
- 3.- Cuando se ha detectado que el acto de discriminacion se ha convertido en una conducta repetitiva. En estos casos se incluire la fecha del ultimo acontecimiento.

Una vez que se reciba la queja, el / la Coordinador del Titulo VI/ADA del del **Departamento de**

**Transporte y Desarrollo de Louisiana** lo revisara para detenninar si nuestra oficina tiene jurisdiccion. El demandante recibira una carta de notificacion en la cual se le hara saber si la queja sera investigada por nuestra oficina.

El/La coordinador del Titulo VI / ADA del **Departamento de Transporte y Desarrollo de Louisiana** tendra 45 dias para investigar la queja. Si se necesita mas informacion para resolver el caso, el/La Coordinador (a) del Titulo VI / ADA podria contactar al demandante.

Despues de que el/La Coordinador del Titulo VI / ADA revise la queja, emitira una de dos (2) cartas al demandante: una carta de cierre o una carta de hallazgo.

- Una carta de cierre resumiendo las alegaciones del caso en la cual indicara que no hubo una violacion del Titulo VI / ADA y por tal motivo el caso sera cerrado.
- Una carta de hallazgo resumiendo las alegaciones y las entrevistas sobre el supuesto incidente en esta misma carta se le explicara al demandante si se llevara a cabo alguna accion disciplinaria, entrenamiento adicional al personal o se tomara alguna otra accion necesaria.

Si el demandante desea apelar la decision, el tendra 180 dias despues de la fecha marcada en la carta de cierre o de la carta de hallazgo para hacerlo. El / La Coordinador (a) del Titulo VI / ADA analizara los hechos del caso y emitira su conclusion al apelante en un periodo de 60 dias despues de haber recibido la apelacion.

## **Chapter 7: Non-Discrimination Title VI / ADA Complaint Form**

The Louisiana Department of Transportation and Development's Non Discrimination (Title VI / ADA) Complaint Form is made available in the following locations:

- Agency website, if available: [www.ladotd.gov](http://www.ladotd.gov)
- Hard copy in the central office
- Upon request to DOTD Title VI Coordinator in the DOTD Compliance Section.

## Non-Discrimination Title VI / ADA Complaint Form

### Section I:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Home): \_\_\_\_\_

Telephone (Work): \_\_\_\_\_

Email Address: \_\_\_\_\_

Accessible Format Requirements?

Large Print

TDD

Audio Tape

Other

### Section II:

Are you filing this complaint on your own behalf?

Yes\*

No

\*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining: \_\_\_\_\_

Please explain why you have filed for a third party: \_\_\_\_\_

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

Yes

No

### Section III:

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

Race  Color  National Origin  Disability  Sex  Age  Income Status  JLEP

Date of Alleged Discrimination (Month, Day, Year) \_\_\_\_\_

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

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### Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

### Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes

No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Court \_\_\_\_\_

State Agency \_\_\_\_\_

Local Agency \_\_\_\_\_



Please provide information about a contact person at the agency/court where the complaint was filed.
<b>Name:</b>
<b>Title:</b>
<b>Agency:</b>
<b>Address:</b>
<b>Telephone:</b>
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below

\_\_\_\_\_

Signature Date

If information is needed in another language, contact 225-379-1923.

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

Cynthia H. Douglas, Title VI/ADA Program Manager  
P.O. Box 94245  
Baton Rouge, LA 70804-9245

Telephone Number: (225)379-1923  
Fax Number: (225)379-1865

<b>Procedimiento de Queja Titulo No Discriminacion for Department of Transportation and Development</b>	
<b>Sección I:</b>	
Nombre: _____	
Dirección: _____	
Teléfono (Casa/Celular): _____	Teléfono (Trabajo): _____
Dirección de correo electrónico: _____	



Agencia local: \_\_\_\_\_

Sírvanse proporcionar información acerca de una persona de contacto en la corte / entidad donde se prese

Nombre: \_\_\_\_\_

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

**Sección VI**

Nombre de la agencia/compañía de queja es contra: \_\_\_\_\_

Persona de contacto: \_\_\_\_\_

Título: \_\_\_\_\_

Teléfono: \_\_\_\_\_

Firma: \_\_\_\_\_

Fecha: \_\_\_\_\_

Por favor, envíe este formulario en persona en la dirección indicada más abajo:

Cynthia H. Douglas, Gerente del Programa Título VI/ADA  
CORREOS. Caja 94245  
Baton Rouge, LA 70804-9245

Teléfono: (225)379-1923  
Número de fax: (225)379-1865

**Chapter 8: List of Transit-Related Title VI Investigations, Complaints, and Lawsuits**

**Subrecipient:**  
**Louisiana Department of Transportation and Development (LADOTD)**

**Contact Person:**  
  
**Paula Roddy**  
**Compliance Programs Director**

**Contact Person:**  
  
**Michelle Horne**  
**Public Transit Director**

**Check one:**

  X   There have been no investigations, complaints and/or lawsuits filed against LADOTD during the reporting period.

There have been investigations, complaints and/or lawsuits filed against LADOTD during the reporting period. See attached list. Include additional information and documentation as needed.

Investigation/Complaint/Lawsuit	Date	Agency	Status	Resolution



## **Chapter 9: Public Participation Plan**

The Louisiana Department of Transportation and Development is responsible for maximizing the limited transportation funding by coordinating with government agencies, public bodies, transit operators, human service agencies, and the general public. LADOTD has developed a Committee to encourage diversity among DOTD personnel, partners, customers and sub-recipients. This committee has developed “Guidance for Encouraging Diverse DOTD Representation at Public Meetings” to support a vision and a business rationale for diversity and inclusion within the Department.

To be successful, DOTD must promote itself to all segments of Louisiana society- every race, every ethnicity, every cultural background, male and female, young and old. We must reflect the diversity of Louisiana to establish and maintain a level of comfort and confidence in customer relations and service. Therefore, it is essential that DOTD provide diverse employee representation at public meetings to the extent practicable.

This guidance is intended to aid those DOTD sections and individuals who plan, organize, and conduct public meetings in considering the composition of the team, including consultants, that will represent DOTD with respect to the anticipated composition of the public that will attend the meeting. The purpose is twofold:

1. To the extent practicable, ensure that members of the audience can identify with at least one member of the DOTD team
2. To display the diversity of DOTD as a state agency serving all of the citizens of Louisiana.

### **Public Meeting Planning Considerations:**

- Type of Meeting
- Format of Meeting
- Subject of Meeting
- Who should attend – with specific attention to ensuring the participants are representative of the demographics on both presenters and public participants
- Audience demographics – to include census driven attention to race, ethnicity, age, language proficiency, income, education, and gender
- Meeting venue – with attention to accessibility and proximity to project area
- Date/Time of meeting to consider public availability

## **Guidance for Assembling a Diverse DOTD Team:**

The task of the meeting organizer is to assemble a team to represent DOTD that is reflective of the demographics of the area such that members of the audience can identify with at least one member of the team. In doing so, the following should be considered:

- Make sure the presentation format, style, and graphics are reflective of the area, or at least are neutral, such as in pictures or artist renderings of people, buildings, or streetscapes, etc. District staff and local officials may be able to provide insight into any locally sensitive issues.
- Presenters should be well-informed employees who match the demographics of the area to the extent practicable.
- While each member of the DOTD team does not need to be well versed in every aspect of the project, each member must be able to meaningfully participate in the public meeting. If they cannot, the public may come to the conclusion that the DOTD staff is inexperienced or incompetent, and that would cause more harm than benefit.
- The team should include an employee from the DOTD District Office in which the meeting is held. Headquarters staff are often not known and are considered outsiders. District staff are more likely to be considered insiders and more trustworthy.
- Presentations should be accessible and understandable to citizens of all education levels. Simplify your message.
- Arrange for an interpreter(s) if the demographics of the area indicate such services are needed. The Compliance Programs Section can assist with securing such services.

## **Meeting Notifications:**

- Notification and/or approval to hold a public meeting should be obtained from the Section Administrator.
- Notification of meetings should be forwarded to the Public Information/Customer Service Section for placement in a central location on the DOTD intranet that is accessible to all employees.
- Employees and consultants that will represent DOTD should be notified in advance of the expected audience demographics and any known locally sensitive issues or concerns.

## **Participation in Non-DOTD Events:**

DOTD is often requested to participate in public meetings conducted by external parties (other state agencies, local governments, business or community organizations, etc.). If more than a few DOTD employees/consultants will be participating, the organizer or leader of the DOTD team should consider the composition of the team using much of the guidance set forth in the “Guidance for Encouraging Diverse DOTD Representation at Public Meetings”.

In addition to the LADOTD efforts, the Public Transportation Section actively participates in the development of the Human Services Transportation Coordination Plan for the state and the Statewide Transportation Plan. The development of these plans also include public participation through the development and implementation of activities.

Projects funded through FTA funds must be a product of the statewide and nonmetropolitan transportation planning process and/or the metropolitan planning process specified in the joint Federal Highway Administration (FHWA)/FTA planning regulations at 23 CFR part 450 and 49 CFR part 613. Long range planning and goal-setting activities for the individual programs covered are carried out within these statewide, nonmetropolitan, and metropolitan planning processes, discussed further below.

### **Transportation Plan Concurrency**

Projects awarded assistance grants must be a product of the metropolitan planning process or the statewide planning process specified in Section 5303 and Section 5304. All transit projects anticipating using Federal funding within metropolitan planning boundaries must be included in a metropolitan TIP approved by the MPO and the Governor, and in a Statewide Transportation Improvement Program (STIP) that has been approved by FTA and the Federal Highway Administration (FHWA).

### **Transportation Improvement Plan**

The TIP is a federally-required program document, which lists all the transportation projects to be built or implemented in a metropolitan area that have secured and committed funding. The document is a short term planning guide that generally covers four years. All FTA-funded public transportation projects must be included in the appropriate TIP.

### **Statewide Transportation Improvement Program**

The STIP is a planning document, which lists all the transportation projects to be built or implemented in the state that will utilize federal and local funding. The document must be submitted to both the FHWA and FTA at least every four years. All FTA-funded public transportation projects must be included in the appropriate STIP.

### **Louisiana Statewide Transportation Plan**

The long-range planning goals for the state of Louisiana were outlined in the most recent update to the Statewide Transportation Plan. The goals for Louisiana's transportation system are as follows:

- ▶ To develop and maintain an innovative, balanced, safe, equitable, integrated system of transportation facilities and services.
- ▶ To provide essential passenger-transportation services at reasonable public expenses, meeting the diverse needs of the people of Louisiana regardless of their geographic location, physical condition, economic status, or service requirements.

- ▼ To provide a transportation system that fosters diverse economic and job growth, international and domestic commerce, and tourism through prudent investment in facilities and services that improve mobility and access. The system should be responsive to free markets and to user needs and expectations, through flexibility and choice, in a competitive, multimodal environment.
- ▼ To provide a regulatory and comprehensive policy framework that promotes partnerships, coordination, and cooperation among transportation users and providers in a competitive multimodal environment.
- ▼ To improve safety in all transportation modes through timely maintenance of existing infrastructure, development of new infrastructure, enhancement of operational controls of both passenger and freight movements, and through expanded public education and awareness.
- ▼ To develop an efficient transportation system that improves air, water, and noise indices to acceptable levels as defined by regulatory standards; reduces dependency on foreign energy sources; preserves historic, cultural, and environmentally sensitive sites; promotes the natural beauty of the State; raises the quality of life for Louisiana's citizens; uses land resources efficiently by incorporating smart growth development principles; and promotes and implements the context sensitive design of transportation infrastructure.

The Louisiana Statewide Transportation Plan is updated periodically. Transportation system goals and focus areas may change over time, however, the overall aim is to provide a safe, efficient, and well-maintained transportation system and is anticipated to remain constant.

### **State Agency Coordination**

The Department of Transportation and Development actively fosters state level coordination initiatives. These initiatives are executed in the Review Committee and other inter-agency committees. DOTD coordinates FTA funding for programmatic or public transportation operations, has developed a Statewide Human Services Transportation Plan, and is involved in regional coordination plans. DOTD also provides coordination workshops charged with the responsibility to enhance coordination of transportation services at the regional level. Specific efforts to coordination have been undertaken through DOTD, the MPOs and local public and private transportation providers by having quarterly regional human services transportation plan meetings. Included in these meetings are all the State Human Services Agencies that administer or fund public transportation in Louisiana. These include the following state agencies:

- ▼ Governor's Office of Elderly Affairs (GOEA);
- ▼ Department of Children and Family Services (DCFS);
- ▼ Louisiana Department of Health (LDH);
- ▼ Louisiana Workforce Commission (LWC);
- ▼ Governor's Office of Disability Affairs (GODA); and,
- ▼ Louisiana Department of Transportation and Development (DOTD).



These state agencies are responsible for the management and administration of programs whose clients are likely to include the elderly and individuals with disabilities. Each of these agencies are represented on the Review Committee where each agency delegate has an opportunity to identify coordination issues and opportunities. DOTD relies on the diversity of programs and groups represented on the Review Committee to assist in coordinating the available resources and services and to ensure the maximum coordination of transportation services.

The purpose of coordination is to obtain the maximum use of transportation resources and increase the cost efficiency of providing transportation services by coordinating and consolidating administration, planning and funding of providing public and specialized transportation services.

DOTD is responsible for providing and/or administering transportation services and resources and share a common goal of managing available transportation service funding in an accountable and cost-effective manner. The degree of success achieved by each plan however, is predicated on continuous open communication, and cooperation and coordination of resources between the respective agencies, providers and individuals.

The development of a truly coordinated human service transportation plan in Louisiana is dependent on state administered funds being coordinated to both build and maintain the system. Although federal funds administered by DOTD are allocated by program, the state can coordinate the expenditure in such a way as to obtain optimal benefit. DOTD intends to continue its efforts to coordinate Louisiana's publicly funded transportation systems.

### **State Efforts to Encourage and Enhance Project Level Coordination**

The potential for coordination is enhanced through the DOTD application process which requires applicants to notify other transportation service providers and to publish public notices about the intent and description of the proposed project. Such contacts with all parties interested in or involved with providing transportation services foster opportunities to coordinate resources and services. DOTD's application procedures require applicants in urbanized areas to contact and coordinate efforts through metropolitan planning organizations.

DOTD's application procedures also require applicants in rural areas to contact and coordinate efforts through the Rural Public Transit Systems.

### **Local Plan Coordination**

The *Louisiana Administrative Handbook for Public Transportation Programs* contains a description of coordination procedures to be followed by local applicants. Applicants are responsible for coordinating with all local governing bodies, public and private transit and paratransit operators which provide service within the project area, and any other interested group or organization. The applicant is required to obtain and provide a description of all transportation services presently operating in the service area.

All FTA-funded public transportation programs must participate in the local planning process for the coordinated human service transportation plan. DOTD has developed a *Statewide Coordinated*

*Human Services Transportation Plan* that works to include transit providers, human services organizations, not-for-profit organizations, and other state agencies with transit needs.

All FTA public transportation program applicants are required to notify the appropriate Metropolitan Planning Organization (MPO) or Regional Planning Commission (RPC) by letter to ensure the proposed project is included in the local transportation improvement plan. The MPO or RPC must certify to DOTD that the proposed project is included in the local transportation improvement plan.

**Public Outreach Activities previous years:**

<b>Date</b>	<b>Lead</b>	<b>Public Outreach and Involvement Activity</b>
5/1/2019	DOTD Compliance	DBE Public Meeting in Baton Rouge
5/7/2019	DOTD Compliance	DBE Public Meeting in Shreveport
5/13/2019	Public Transit Staff	Director's Meetings for all FTA Transit sub-recipients- Held in Natchitoches
5/20/2019	Public Transit Staff	Director's Meetings for all FTA Transit sub-recipients- Held in Baton Rouge
5/21/2019	Public Transit Staff	Director's Meetings for all FTA Transit sub-recipients- Held in Baton Rouge
5/15/2019	Public Transit Staff	DBE open comment announcement issued through STTARS web based reporting system
5/28/2019	Public Transit Staff	DBE open comment extended and issued through STTARS web based reporting system
8/15/2019	Public Transit Staff	Application Training in Shreveport
8/27/2019	Public Transit Staff	Application Training in Baton Rouge
11/20-23/2019	Public Transit Staff and Louisiana Public Transit Association and FTA	State Conference held in New Orleans. Multiple topics to include Title VI/ADA/DBE presentations from FTA Region VI on ADA
2/2020	COVID changed the ability for in person and modifications began being made to fulfill outreach responsibilities.	
2020	Public Transit Staff	Director's Meetings done via email due to COVID
7/2020	Public Transit Staff	Public Notice open call for applications issued through newspapers throughout Louisiana

2/17/21	Public Transit Staff and Compliance	Advisory Committee Member's Meeting Policy and Procedures
5/6/2021	Public Transit Staff	Public Notice open call for applications issued through newspapers throughout Louisiana
11/2021	Public Transit Staff	Director's Meetings for all FTA Transit sub-recipients
5/20/2022	Public Transit Staff	Issued public notice through STTARS web based reporting system to notify transit partners of DOTD hosted DBE meetings
5/24/2022	DOTD Compliance	DBE Public Meeting in Baton Rouge
5/26/2022	DOTD Compliance	DBE Public Meeting in Shreveport
6/8/2022	Public Transit Staff and DOTD Compliance	Director's Meetings for all FTA Transit sub-recipients; DOTD Compliance presented on Title VI equality and DBE participation
6/30/2022	Public Transit Staff	Open comment for revised State Management Plan issued through STTARS web based reporting system
7/2022	Public Transit Staff	Public Notice open call for applications issued through newspapers throughout Louisiana
9/1/2022	Public Transit Staff	Open call for comments regarding updated Coordinated Human Services Plan issued through STTARS web based reporting system

## **Chapter 10: Limited English Proficiency Plan (LEP)**

### **FOUR FACTOR ANALYSIS**

In adherence with Federal regulations, the LADOTD will make reasonable efforts to ensure its programs, services, and activities are meaningfully accessible to those who do not speak English proficiently. The Department will utilize its bilingual employees, State and Local partners, organizations, community groups, and other language services to provide oral interpretation and translation of program documents, as required. To determine if or when alternate language usage is required for meaningful access, the Department will assess the program, services, or activity using the following four factor analysis:

#### **Factor 1 – The number or proportion of LEP persons eligible to be served or likely to be encountered by the Department’s programs, services or activities.**

- The Census 2020 reports a population of 4,657,757 for Louisiana. The 2020 American Community Survey (ACS) shows that the 3 most prevalent languages spoken by individuals who are LEP in Louisiana (among the population 5 years and over who speak a language other than English) are: Spanish or Spanish Creole (2.53%); Other Indo-European (5.44%); Asian and Pacific Islander (1.01%).

#### **Factor 2 – The frequency with which LEP individuals come in contact with these programs, services or activities.**

- Pre-Covid LADOTD’s transit agencies provided more than 2 million passenger trips per year. Agencies have benefited from federal relief funding to maintain systems; however, ridership has not returned to pre-Covid levels. Currently, Louisiana transit agencies are providing nearly 1 million rides and the monthly service data continues to improve. Our transit agencies have an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the LADOTD, if needed to ensure the individual receives access to the transit services.

#### **Factor 3 – The nature and importance of the programs, services, or activities to people’s lives.**

- All of LADOTD’s programs are important; however, those related to safety, public transit, ROW, environment, nondiscrimination and public involvement are among the most important. As such, publications and other material disseminated regarding these programs are routinely available in Spanish. Nevertheless, the LADOTD is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the LADOTD continually evaluates its programs services and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI brochure and LEP brochure are available in Spanish on the LADOTD website.



#### **Factor 4 – The resources available to the Department and costs.**

- The LADOTD makes every effort to make its programs, services and activities accessible to LEP individuals. In addition to documents that are routinely published in the most frequently encountered languages, the LADOTD will use available resources, both internal and external to accommodate reasonable requests for translation.

The LADOTD had identified, developed and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards are verified and distributed by the Title VI Coordinator as needed.
- b) Transit agencies providing service have been provided printable “I Speak” language cards.
- c) The LADOTD and transit agencies have developed partnerships with local agencies, organizations, law enforcement, college/universities, local school districts and social service agencies that are available to assist with its LEP responsibilities.
- d) A list of web based translation services can be provided by contacting the LADOTD Human Resources Section.

Persons requiring special language services should contact LADOTD’s Compliance Programs Office at (225) 379-1382.

#### **IMPLEMENTATION**

The DOTD Title VI Program Manager is responsible for monitoring agency programs and activities to ensure meaningful access for LEP persons. The DOTD Compliance Programs Director and DOTD Title VI Program Manager will identify language service needs and strategies for responding to those needs. The Title VI Program Manager, Cynthia H. Douglas, can be reached at 225-379-1923 or by email at [cynthia.douglas@la.gov](mailto:cynthia.douglas@la.gov) is responsible for monitoring agency programs and activities to ensure meaningful access for LEP persons. The Compliance Programs Director has designated the Title VI Program Manager as the agency’s Language Access Coordinator (LAC). The Coordinator’s duties include:

- Ensure identification and securing of existing and needed resources (in-house, new hires contract, resource sharing with other agencies, volunteers, or other) to provide oral and written language services.
- Identify and develop or recommend guidelines to implement the Plan.
- Identify criteria for designation of languages for initial round of translation, based on demographic data;
- Create systems to distribute translated documents, post electronically, and main supply;
- Identify training needs and provide for training to LEP Monitors, staff and managers needing to use language services, as well as language service providers on staff.
- Establish protocols for ensuring quality, timeliness, cost-effectiveness, and appropriate levels of confidentiality in translations, interpretation, and bilingual staff communications.
- Identify and implement a system for receiving and responding to complaints.
- Exchange promising practices information with divisions, districts, and residencies.

- Review the progress of LADOTD on an annual basis in providing meaningful access to LEP persons, develop reports, and modify LEP Guidelines as appropriate.

LEP Monitors – in addition, the Compliance Programs Director, the Title VI Program Manager and Title VI interdisciplinary Designees will serve as LEP Monitors for sections and districts. LEP Monitor duties include:

- Work with the LEP Coordinator to identify needs and strategies for meeting those needs so that staff will have access to appropriate language services.
- Ensure the facility’s compliance with the LEP Guidelines, including any implementation.
- Provide training to facility staff on implementation of LEP Guidelines.
- Establish and maintain the facility’s language assistance resources list, ensuring competency; revise the list as needed.
- Maintain data on requests from LEP persons and provide reports to management and the LEP Coordinator on an annual basis.

### Training

LADOTD subrecipients should know their obligations to provide meaningful access to information and services for LEP persons, and all persons in public contact positions should be properly trained. An effective training objective will include training to ensure that:

- LADOTD subrecipients know about LEP policies and procedures
- LADOTD subrecipients will include this training as part of the orientation provided for new employees.

Management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff. As mentioned above, training will be provided by the Title VI Program Manager and Compliance Programs Director.

### **SITUATIONAL NEEDS ASSESSMENT**

The agency will be responsive to all customer relations related to assess the need for language services on a district and/or statewide basis and make language assistance services available as deemed appropriate. In making this assessment, the agency will examine the prevalence of LEP stakeholders statewide, by district and/or by service area of program:

- The number of proportion of LEP persons served or encountered in the eligible service population
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program, activity, or service to people’s lives
- The resources available to LADOTD and costs to provide LEP services

In making this assessment, the agency will consider the following among other data sources:

- United States census results
- Data maintained by the agency
- The agency's past experience in providing services to LEP stakeholders
- Data maintained by other agencies including the Louisiana Department of Education and the Louisiana Department of Health
- Information sources maintained by private and public local entities, including community-based organizations and local social services departments need will be identified based upon the type of contract.

Contact the DOTD Compliance Programs Director or the DOTD Title VI Program Manager. They will assist in identifying the language need of the LEP person and provide them with assistance.

#### Written documents

Contact the Compliance Programs Director or the Title VI Program Manager. Electronic capability will result in the efficient return of written translated documents. The district can scan the document and email it to the Compliance Program Office, their Title VI Designee or the Title VI Program Manager. If they do not have scanning capability and the document was not received by them electronically, then they can use inter-office mail to send the document.

- a) The Title VI Program Manager will create a mix of language assistance resources appropriate to the demographics of each district.
- b) The Title VI Program Manager will evaluate language resources available in their service area including community colleges, state and private universities, and community-based organizations. (Civil Rights Managers may, with the approval of the Civil Rights Division Administrator, enter into agreements for the provision of such services with community resources.)
- c) Districts with a lower need for language services may coordinate with other districts that maintain a larger resource pool to utilize their language resource services to any extent practicable.
- d) The Title VI Program Manager will maintain a database tracking LEP contacts. District offices shall make the data available to the Title VI Program Manager as requested.
- e) The Title VI Program Manager will communicate to staff that the use of a family member or friend may only take place after informing an LEP person of his/her right to free interpreter services and will only be used as a last result because family members may not have the subject knowledge necessary to communicate the information accurately and in the best manner possible.

#### Headquarters

- a) The DOTD Title VI Program Manager will institute an LEP protocol appropriate to Headquarters.
- b) Headquarters protocol will be designed using the agency resources described in section 2 of these guidelines.

#### Other Covered Entities:

Contractors, sub-contractors, MPOs, PDCs, and other entities that receive funds from LADOTD for federal projects are covered under Title VI and Executive Order 13166. LADOTD will include language in any contract or Memorandum of Understanding stating that the recipient or subrecipient is responsible for monitoring access for limited English proficiency.

## **AGENCY DOCUMENTS**

The DOTD Title VI Program Manager, Compliance Programs Director and management will, on a continuing basis, identify vital documents that are routinely provided to stakeholders that will be translated into languages other than English. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Whether or not a document is vital depends on how significant the impact on the health, safety, legal rights, or livelihood of an LEP person may be. Written documents included electronic documents and websites. Vital documents may include materials such as:

- Emergency transportation information;
- Notices of public hearings and proposed transportation plans;
- Community educational materials;
- Notices notifying LEP persons of language assistance at no cost to the LEP person;
- Written tests in a classroom;
- Markings, signs, and packaging for hazardous materials and substances;
- Signs in bus and train stations, and in airports;
- Signs in waiting rooms, reception areas, and other initial points of entry; and
- Instructions on how to participate in recipient's program.

The DOTD Title VI Program Manager will coordinate with a Language service provider to have identified documents translated accordingly.

Translated documents will be made available on the LADOTD portal for sections' and districts' access.

## **ADJUDICATION OF COMPLAINTS**

Any LEP individual has a right to file a complaint against the agency where he or she believes that the agency did not provide necessary LEP services as appropriate. These complaints include those available under Title VI of the Civil Rights Act of 1964.

All complaints, alleging a violation under Title VI will be referred to the DOTD Title VI Program Manager or Compliance Programs Director.

The DOTD Title VI Program Manager and Compliance Programs Director will take appropriate steps to resolve all complaints in accordance with the agency's discrimination complaint procedures.

The DOTD Title VI Program Manager will maintain a database tracking requests for language services. The database will include the following items:

1. Source of complaint

2. LEP request including relevant contact information
3. Nature of complaint request
4. Date complaint / request received
5. Date complaint / request resolved
6. Finding
7. Manner of resolution
8. Comments

Fact-finding procedures by the Title VI Program Manager and Compliance Programs Office will follow the investigation protocol in the Title VI Manual.

Additional resources to support language translation would be sought through universities, community colleges, catholic charities, and other interpreter services in local areas of need.

### Chapter 11: Transit Planning and Advisory Bodies

Below is a table depicting the membership of appointed committees and councils broken down by race. LADOTD will make efforts to encourage minority participation on all advisory groups and committees. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit community. LADOTD will utilize the minority population demographic maps in order to focus on the areas in which the committee/advisory group participation information is distributed.

Body	White alone	Black or African-American alone	Asian alone	American Indian and Alaska Native alone	Two or more Races	Latino
Service Area Population	57.1%	31.4%	1.9%	0.7%	5.9%	6.9%
House Transportation Committee Members	9 Males 3 Females	5 Males 1 Females				
Senate Transportation Committee Members	6 Males 0 Female	2 Males 0 Females				

## **Chapter 12: Subrecipient Technical Assistance and Oversight**

It is the responsibility of the DOTD Compliance Program Manager to develop and implement a Non-Discrimination template for FTA subrecipients to utilize in developing their own agency plan. DOTD Public Transit will monitor their sub recipients and solicit guidance from DOTD Compliance if discrimination practices are found to exist.

Procedures will be implemented by DOTD Compliance Section to identify and eliminate discrimination when found to exist, including, but not limited to issues of accessibility of National Highway Institute (NHI) training to all qualified LADOTD employees, utilization of Disadvantaged Business Enterprises (DBE) contractors, public involvement, and property acquisition.

LADOTD transit subrecipients will submit a triennial Title VI program to the DOTD Public Transit staff to assure effectiveness in their compliance of Title VI provisions. The Appointing Authority of the program area or agency will coordinate efforts to ensure the equal participation in all their programs and activities at all levels. The reviews will entail examination of the recipients' adherence to all program requirements, including DBE responsibilities.

The Title VI Unit will conduct an on-site review on the Department's program areas and subrecipients on a three-year rotational basis.

### **Remedial Action**

LADOTD will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements, both within LADOTD and its subrecipients of federal highway funds and federal transit funds. When irregularities occur in the administration of the federal-aid highway program's operation, corrective action will be taken to resolve Title VI issues. When conducting Title VI compliance reviews on its subrecipients, LADOTD will provide in writing a remedial action agreed upon by LADOTD and FTA to be necessary all within a period not to exceed 90 days.

LADOTD will seek the cooperation of the subrecipient in correcting deficiencies found during the review. LADOTD will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.

Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies.

When a sub recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the LADOTD will submit to the FTA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously



identified. If the sub recipient refuses to comply, LADOTD may, with FTA's concurrence, initiate sanction per 49 CFR 21.

### **Transit Providers**

With every grant application, the Public Transportation Section obtains:

- A nondiscrimination assurance
- A list of any active lawsuits or complaints naming the potential grantee that allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits
- A list of all pending applications for financial assistance and all financial assistance currently provided by other federal agencies
- A summary of all civil rights compliance review activities conducted during the last three years. The summary includes:
  - Purpose or reason for review
  - Name of organization performing the review
  - Summary of findings and recommendations of the review
  - Report on the findings and recommendations of the review

The Public Transportation Section includes specific language in each grant agreement which states that the grantee shall include the civil rights laws and regulations compliance in each subcontract financed in or whole or in part with federal assistance provided by FTA, modified only if necessary to identify the affected parties.

The Public Transportation Section maintains a file of all such reports and requires that the grantees have such records available for review by LADOTD or FTA.

The Public Transportation Section obtains and reviews Title VI Program Plans for each of its subrecipients every three years. To assist the subrecipients in developing the Title VI programs, the Public Transportation Section developed a plan template and provided training in plan development to subrecipients. Ongoing technical assistance is available for subrecipients.

The Public Transportation Section conducts triennial compliance reviews that address implementation of Title VI plans and compliance with Title VI requirements. The site visits enable the Region Program Manager to provide one-on-one technical assistance and provide an opportunity for determining whether subrecipients need to update the Title VI plans.

### **Chapter 13: Title VI Equity Analysis for Construction**

LADOTD and subrecipients have not constructed facilities in the last three years and do not have plans for identifying or constructing facilities in the next period. If LADOTD were to change plans the NEPA process will be utilized to determine if any adverse impacts might result from federally funded transportation projects. LADOTD will follow the appropriate Title VI Analysis on projects during the planning phase and submit to FTA.

## Chapter 14: State Program Requirements

### DEMOGRAPHIC PROFILE AND ANALYSIS

The Louisiana DOTD used demographic data from the US 2020 Decennial Census to identify minority population distribution by census tract throughout the state. This information, combined with federal funding distribution data, allows DOTD to identify any potential disparate impacts on minority populations as they relate to public transportation funding. In previous demographic and federal funding data analysis, LADOTD determined that there are no disparate impacts in FTA funding by parish from Fiscal Years 2018 through 2020. This report is an updated analysis of FY 2020-2022 funding data is needed to consider and determine disparate impact.

Several census tracts across the state may be experiencing disparate impacts related to FTA funding generally. The analysis reveals numerous census tracts in Orleans, Lafayette, and others have greater than 50 percent minority populations but receive less than \$20 of federal transit funding per capita. However, these locations are more densely populated with fixed route transit systems serving the community more efficiently. As LADOTD considers FTA funding distribution and transit support at the census tract and parish levels, it will need to evaluate areas that receive less funding per capital for public transit services and determine and determine how they can support local transit providers in order to mitigate and minimize funding gaps.

#### Minority Population

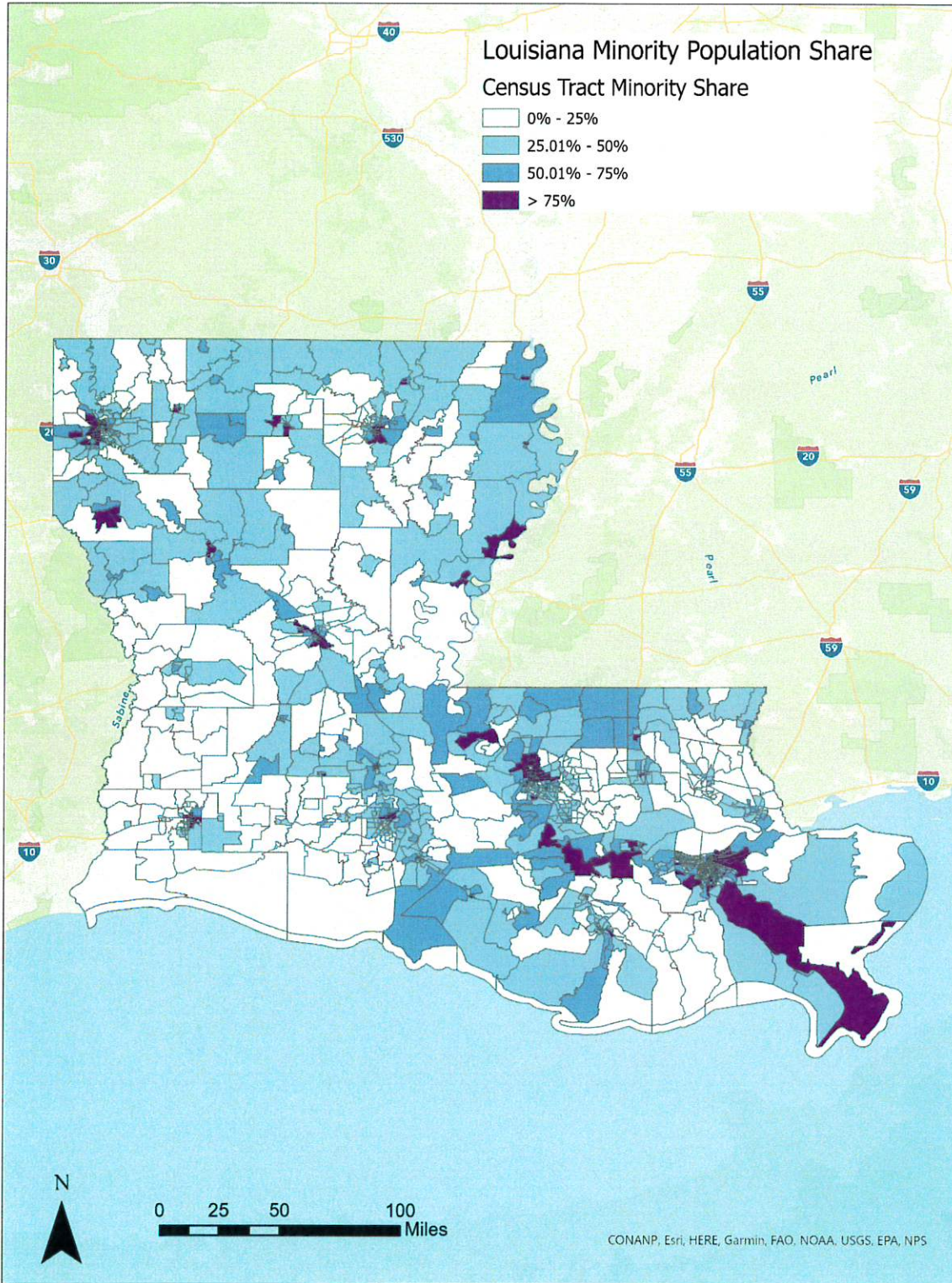
The Louisiana statewide minority population<sup>1</sup> for the 2020 Census is 44.25%. All census tracts that consist of at least 50% minority populations were identified to analyze any potential disparate impact on minority communities. Census tracts within the four most populous parishes, East Baton Rouge, Jefferson, Orleans, and Caddo account for 43.50% of the State's minority population and 32.62% of the State's total population. Census tracts with parishes that have minority population shares over 50% receive FTA funds from a variety of sources with the exception of East Carroll Parish (which has a population of less than 8,000). Parishes with the highest minority population shares include East Carroll, Madison, Tensas, St. Helena, St. John the Baptist, Orleans, Caddo, Claiborne, East Baton Rouge, Iberville, and St. James Parishes. Eight of these 12 parishes are considered rural areas by the FTA's definition. Orleans, East Baton Rouge, and Caddo contain the three largest cities/urban areas in Louisiana (New Orleans, Baton Rouge, and Shreveport).

Figure 1 represents the share of minority population by census tract in Louisiana. Louisiana has 530 census tracts with populations that are 50 percent minority or higher, out of 1,388 tracts in the state. Many of these census tracts 369 are concentrated in parishes that are largely urban, such as Orleans, East Baton Rouge, and Caddo. However, there are 161 census tracts located in rural parishes with more than 50 percent minority population shares.

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<sup>1</sup> For the purpose of this analysis, the minority population is the population identifying themselves as either "Hispanic or Latino" in the ethnicity category and all other races other than "White alone".

**Figure 1. Minority Population Share by Census Tract in Louisiana**



Source: Alliance Transportation Group, 2022, U.S. Census Bureau 2020 Decennial Census

### **Federal Funding Distribution**

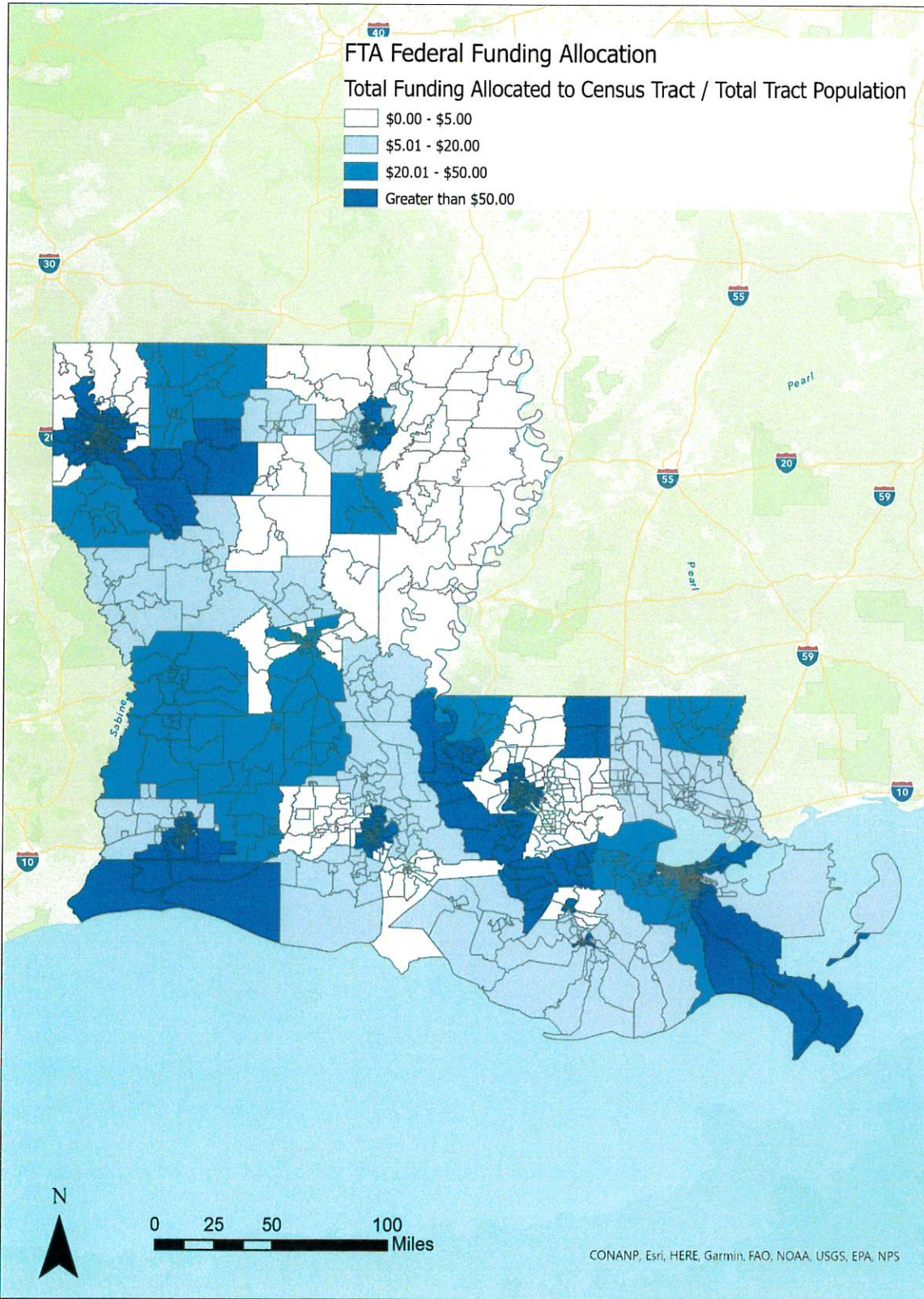
DOTD FTA federal transit funding distribution per census tract per person appears to be concentrated in urban parishes, such as Orleans and Caddo. 241 census tracts out of 1,388 tracts in Louisiana receive less than \$5 per census tract per person in funding. Another 314 census tracts receive less than \$20 per census tract per person in FTA transit funding. In general, rural parishes appear to receive less federal transit funding compared to parishes with greater resources and matching funds. As rural parishes may have greater difficulty in obtaining resources and matching funds for FTA transit funding, DOTD will make efforts to provide support to provide increased transit service and funding to these census tracts.

In Louisiana, all parishes received FTA funding except for Concordia, East Carroll, Franklin, Jackson, Morehouse, Richland, Tensas, and Union Parishes for the Fiscal Years 2020-2022.

Figure 2 displays FTA Federal transit funding allocation per census tract per person in Louisiana.



**Figure 2. FTA Federal Funding Allocation per Census Tract per Person**



Source: Alliance Transportation Group, 2022; United States Census Bureau 2020 Decennial Census

## Disparate Impacts Analysis

Of the 530 census tracts considered minority, there are 107 that are also located in areas where less than \$20 per capita for the years indicated. However, it is noted that of these 107, six census tracts in St. Bernard and East Baton Rouge Parishes are in urban areas where fixed route transit service is able to provide transit service more efficiently to the population. The remaining 101 census tracts, listed in Table 1 below have been identified as experiencing potential disparate impacts, in that they receive low levels of FTA funds.

Several census tracts in the state do contain disparate impact in terms of federal transit funding distribution. Census tracts in some rural parishes do not receive federal transit funding due to lack of parish and local matching resources and funds. While these disparities may not be a result of LADOTD policy; rather due to local resource challenges and implementation difficulties, LADOTD can prioritize projects that will close the funding gap when local partners bring forth projects to provide public transit services and funding to these areas. Parishes in northeast and south Louisiana, such as East Carroll and Catahoula Parishes, contain census tracts that receive little to no funding per person. There may be additional opportunities for LADOTD to bring partners together to develop resources in these parts of the state through the human services coordination process or through funding coordinator positions in these areas. For example, a pilot demand response program could be implemented in tracts with little to no transit funding to cover public service gaps across the state.

Figure 3 displays the total federal transit funding per person in each census tract compared to the minority share of the census tract population.

**Table 1. 2020 Census Tracts with Greater than 50% Minority Populations and lower FTA Funding Levels.**

2020 Louisiana Census Tract	Parish	Population	Minority Population	Minority Share	Funding per capita
Census Tract 9609.01	Acadia	3189	1855	58.17%	\$0.79
Census Tract 9609.02	Acadia	1183	845	71.43%	\$0.79
Census Tract 304.04	Ascension	2955	1561	52.83%	\$0.89
Census Tract 304.05	Ascension	4911	3461	70.47%	\$0.89
Census Tract 304.06	Ascension	4245	3021	71.17%	\$0.89
Census Tract 309	Ascension	3906	3027	77.50%	\$3.05
Census Tract 310.01	Ascension	2304	1436	62.33%	\$3.05
Census Tract 310.02	Ascension	3527	2897	82.14%	\$3.05
Census Tract 304.02	Avoyelles	2863	1799	62.84%	\$17.73
Census Tract 306	Avoyelles	4509	2569	56.97%	\$17.73
Census Tract 307.01	Avoyelles	4152	2618	63.05%	\$17.73
Census Tract 2	Catahoula	2106	1502	71.32%	\$0.00
Census Tract 2.01	Concordia	2360	1806	76.53%	\$0.00
Census Tract 2.02	Concordia	2755	2218	80.51%	\$0.00
Census Tract 46.02	East Baton Rouge	6500	3904	60.06%	\$3.08

<b>2020 Louisiana Census Tract</b>	<b>Parish</b>	<b>Population</b>	<b>Minority Population</b>	<b>Minority Share</b>	<b>Funding per capita</b>
<b>Census Tract 46.03</b>	East Baton Rouge	6383	4012	62.85%	\$3.08
<b>Census Tract 1</b>	East Carroll	2532	1697	67.02%	\$4.46
<b>Census Tract 2</b>	East Carroll	2752	1588	57.70%	\$0.00
<b>Census Tract 3</b>	East Carroll	2175	2140	98.39%	\$4.46
<b>Census Tract 9513</b>	East Feliciana	2670	1398	52.36%	\$1.65
<b>Census Tract 9514</b>	East Feliciana	3462	1811	52.31%	\$1.65
<b>Census Tract 9503</b>	Franklin	5286	3887	73.53%	\$0.00
<b>Census Tract 203</b>	Grant	2510	1374	54.74%	\$8.04
<b>Census Tract 301.01</b>	Iberia	4286	2820	65.80%	\$4.20
<b>Census Tract 304.02</b>	Iberia	3305	1899	57.46%	\$4.20
<b>Census Tract 308</b>	Iberia	1819	1747	96.04%	\$4.20
<b>Census Tract 309</b>	Iberia	3278	2448	74.68%	\$4.20
<b>Census Tract 310</b>	Iberia	3009	2599	86.37%	\$4.20
<b>Census Tract 311.01</b>	Iberia	3307	2247	67.95%	\$4.20
<b>Census Tract 316</b>	Iberia	3046	2165	71.08%	\$4.20
<b>Census Tract 9704</b>	Jackson	3001	1926	64.18%	\$0.00
<b>Census Tract 209</b>	Lafourche	2034	1036	50.93%	\$4.76
<b>Census Tract 9603</b>	Lincoln	5574	5265	94.46%	\$16.37
<b>Census Tract 9608</b>	Lincoln	3902	3024	77.50%	\$16.37
<b>Census Tract 9609</b>	Lincoln	2369	2026	85.52%	\$16.37
<b>Census Tract 9603</b>	Madison	2335	2103	90.06%	\$4.46
<b>Census Tract 9604</b>	Madison	1437	1398	97.29%	\$4.46
<b>Census Tract 9605</b>	Madison	2065	1496	72.45%	\$4.46
<b>Census Tract 9504</b>	Morehouse	2895	2619	90.47%	\$0.00
<b>Census Tract 9505</b>	Morehouse	4243	2845	67.05%	\$0.00
<b>Census Tract 9508</b>	Morehouse	3120	2860	91.67%	\$0.00
<b>Census Tract 4</b>	Natchitoches	3529	3047	86.34%	\$8.04
<b>Census Tract 6.01</b>	Natchitoches	4653	3244	69.72%	\$8.04
<b>Census Tract 6.02</b>	Natchitoches	4341	2751	63.37%	\$8.04
<b>Census Tract 7</b>	Natchitoches	2785	2203	79.10%	\$8.04
<b>Census Tract 9.01</b>	Natchitoches	2635	1569	59.54%	\$8.04
<b>Census Tract 55</b>	Ouachita	3196	1915	59.92%	\$15.67
<b>Census Tract 102.04</b>	Ouachita	3690	2614	70.84%	\$11.21
<b>Census Tract 111</b>	Ouachita	3041	2249	73.96%	\$15.67
<b>Census Tract 9701</b>	Richland	2813	1945	69.14%	\$4.46
<b>Census Tract 9705</b>	Richland	4628	3370	72.82%	\$4.46
<b>Census Tract 3</b>	Sabine	1868	1278	68.42%	\$14.14
<b>Census Tract 5</b>	Sabine	3174	1732	54.57%	\$14.14
<b>Census Tract 9606.01</b>	Saint Landry	4653	3427	73.65%	\$5.88
<b>Census Tract 9609.02</b>	Saint Landry	1991	1507	75.69%	\$5.88
<b>Census Tract 9612</b>	Saint Landry	6072	3174	52.27%	\$5.88
<b>Census Tract 9613.01</b>	Saint Landry	2158	1928	89.34%	\$5.88
<b>Census Tract 9613.02</b>	Saint Landry	2810	2498	88.90%	\$5.88
<b>Census Tract 9614.01</b>	Saint Landry	1905	1446	75.91%	\$5.88

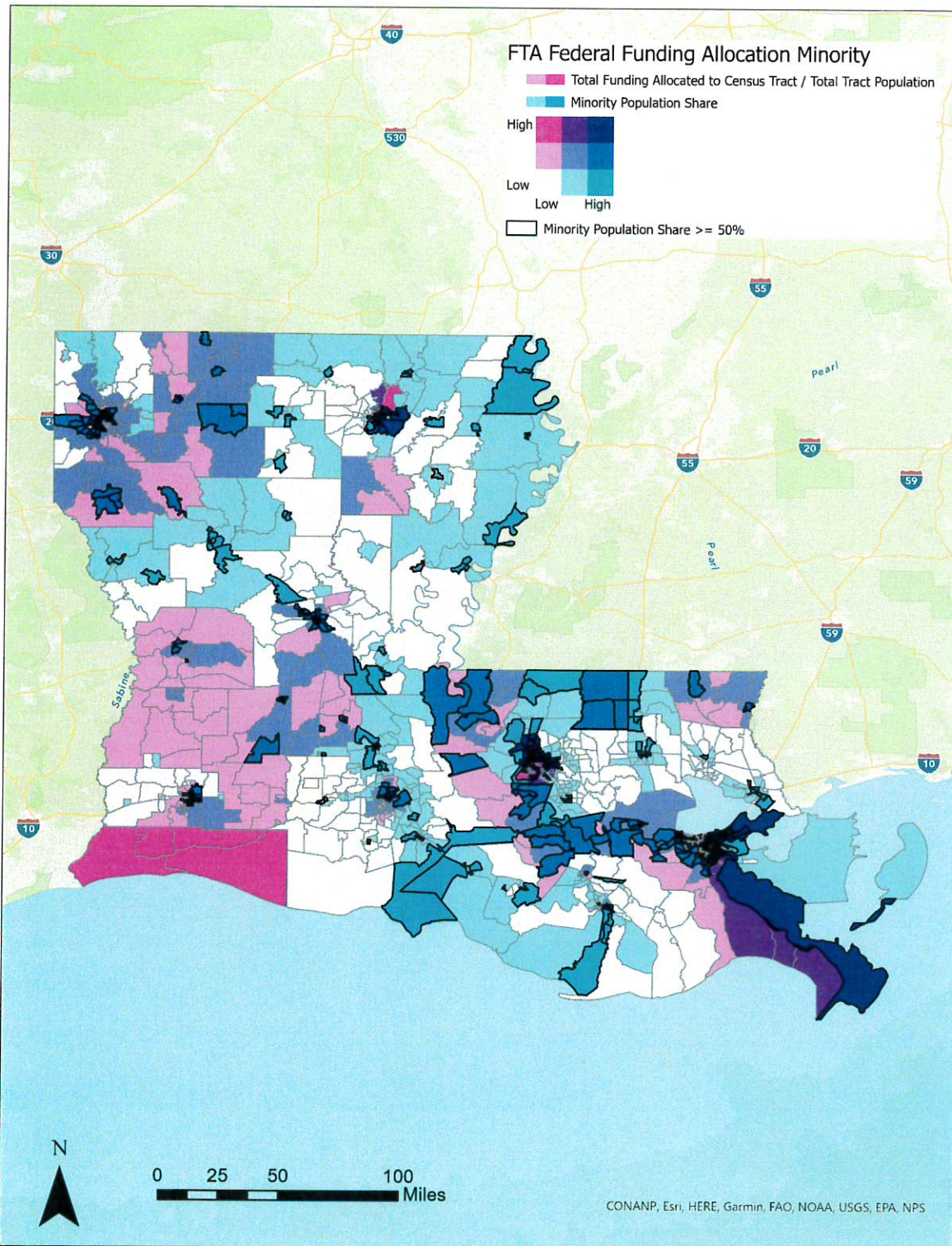


2020 Louisiana Census Tract	Parish	Population	Minority Population	Minority Share	Funding per capita
Census Tract 9614.02	Saint Landry	1299	1223	94.15%	\$5.88
Census Tract 9615.01	Saint Landry	1785	1698	95.13%	\$5.88
Census Tract 9616.01	Saint Landry	2009	1704	84.82%	\$5.88
Census Tract 9616.02	Saint Landry	1640	1558	95.00%	\$5.88
Census Tract 9619	Saint Landry	3206	1788	55.77%	\$5.88
Census Tract 206.02	Saint Martin	2917	2176	74.60%	\$17.31
Census Tract 401	Saint Mary	2565	1857	72.40%	\$16.76
Census Tract 403	Saint Mary	2912	1742	59.82%	\$16.76
Census Tract 407	Saint Mary	3633	2206	60.72%	\$16.76
Census Tract 411	Saint Mary	1478	1057	71.52%	\$16.76
Census Tract 412	Saint Mary	1546	1107	71.60%	\$16.76
Census Tract 414	Saint Mary	3142	2006	63.84%	\$16.76
Census Tract 416	Saint Mary	1683	1433	85.15%	\$16.76
Census Tract 405.01	Saint Tammany	4035	2079	51.52%	\$5.52
Census Tract 407.11	Saint Tammany	3960	1992	50.30%	\$5.52
Census Tract 408.06	Saint Tammany	6945	4906	70.64%	\$5.52
Census Tract 408.07	Saint Tammany	5249	3164	60.28%	\$5.52
Census Tract 409	Saint Tammany	3535	2120	59.97%	\$5.52
Census Tract 411.03	Saint Tammany	3457	1864	53.92%	\$5.52
Census Tract 411.05	Saint Tammany	5659	2910	51.42%	\$5.52
Census Tract 9533	Tangipahoa	3786	2664	70.36%	\$11.20
Census Tract 9534.01	Tangipahoa	2974	2006	67.45%	\$11.20
Census Tract 9536.01	Tangipahoa	2044	1728	84.54%	\$11.20
Census Tract 9536.02	Tangipahoa	3485	2495	71.59%	\$11.20
Census Tract 9539.01	Tangipahoa	4703	2462	52.35%	\$11.20
Census Tract 9540.04	Tangipahoa	3276	1767	53.94%	\$11.20
Census Tract 9541.04	Tangipahoa	1719	1015	59.05%	\$11.20
Census Tract 9543	Tangipahoa	3782	2951	78.03%	\$11.20
Census Tract 9544	Tangipahoa	3696	2114	57.20%	\$11.20
Census Tract 9545.06	Tangipahoa	2059	1074	52.16%	\$11.20
Census Tract 3	Tensas	1670	1349	80.78%	\$0.00
Census Tract 6.02	Terrebonne	3092	1897	61.35%	\$19.33
Census Tract 13.01	Terrebonne	3017	2017	66.85%	\$19.33
Census Tract 13.02	Terrebonne	1325	698	52.68%	\$19.33
Census Tract 13.03	Terrebonne	2722	1456	53.49%	\$19.33
Census Tract 9604	Union	3327	2318	69.67%	\$0.00
Census Tract 9508	Vermillion	4570	3237	70.83%	\$12.20
Census Tract 201	West Baton Rouge	3979	2516	63.23%	\$2.22
Census Tract 202	West Baton Rouge	3337	2221	66.56%	\$2.22

<b>2020 Louisiana Census Tract</b>	<b>Parish</b>	<b>Population</b>	<b>Minority Population</b>	<b>Minority Share</b>	<b>Funding per capita</b>
<b>Census Tract 204.01</b>	West Baton Rouge	5195	2634	50.70%	\$2.22
<b>Census Tract 9603</b>	Winn	2377	1364	57.38%	\$2.44
<b>Census Tract 9604</b>	Winn	2110	1350	63.98%	\$2.44

*Source: 2020 Decennial Census and FTA Funding information for years 2020-2022 for 5310 and 5311 Programs. The most recent 5307 Program Funding available was downloaded from National Transit Database for 2016, 2017, and 2018.*

**Figure 3. FTA Federal Transit Funding Allocation per person for each Census Tract compared the Minority Population Share (2020 US Census)**



Source: Alliance Transportation Group, 2022; United States Census Bureau 2020 Decennial Census

## **Transportation Planning Process**

As part of the statewide transportation planning process, DOTD identifies the transportation needs of minority populations by providing these groups with full opportunities to become engaged at all points of the planning process. In order to engage minority communities in the current update to the Statewide Transportation Plan, DOTD has implemented a robust Public Involvement Plan designed to make certain that the outcomes of the Plan reflect the needs of all Louisiana residents, including members of minority communities. This has involved a series of public outreach meetings conducted in geographically diverse locations throughout the state that are designed to inform the public of the planning process, to receive input on the specific needs of various groups, and to validate the recommendations included in the plan. With the understanding that there are often times mobility, language, or other obstacles that make attending public meetings difficult, DOTD has also collected public input through phone interviews and a comment form available on the DOTD website.

In addition to public outreach, DOTD relies on input from the Community Development and Enhancement Advisory Council to ensure that the transportation needs of minority communities are being identified as part of the statewide planning process. This diverse group of public and private stakeholders was formed to provide technical input and to review Plan findings and recommendations through the lens of community development and enhancement, issues that can be especially relevant to minority communities.

FTA regulations governing Section 5310 funds (elderly and disabled transportation), Section 5311 funds (non-urban transportation) require that the state management plan include:

- A description of the process by which the state develops the annual program of project submitted to FTA as part of its Section 5311 grant application, especially the method used to ensure fair and equitable distribution of funds, including to Native American tribes where present.
- A description of the state's efforts to assist sub-recipients in applying for Section 5311 funds, especially any efforts made to assist minority applicants.
- A description of the state's criteria for selecting transit providers to participate in the program, especially its efforts to include sub-recipients serving significant minority populations.
- A description of the state's ongoing process to monitor sub-recipient's compliance with Title VI, such as ongoing site visits to each sub-recipient, review checklists, etc.

In addition, in order for LADOTD to assess compliance requirements, applicants must provide the following information in their application:

- A description of how the transportation needs of minorities will be served if the proposed project is approved for funding.
- A description of the special efforts taken to serve minority communities and address minority transit needs.
- The percentage of minorities in service area population and the percentage of minority users of the agency's transportation system.

Each applicant must provide the total population of the service area, the percentage which are minority, a map of the service area and special efforts taken to serve minority communities and address minority transit needs.

## **Chapter 15: Program Administration**

### **Procedures to Pass Financial Assistance to Subrecipients**

In order for FTA and DOTD to assess compliance requirements, applicants must provide the following information in their Application.

1. A description of how the transportation needs of minorities will be served if the proposed project is approved for funding.
2. A description of the special efforts taken to serve minority communities and address minority transit needs.
3. The percentage of minorities in service area population and the percentage of minority users of the agency's transportation system.

Each applicant must provide the total population of the service area, the percentage which are minority, a map of the service area and special efforts taken to serve minority communities and address minority transit needs.

### **Grant Application Process, Timeline, and Program of Projects Development**

#### **Sections 5310, 5311, and 5316 Programs**

The Louisiana Transit Electronic Awards Management (LA-TEAM) system is an online tool incorporated with the Statewide Transit Tracking and Reporting System (STTARS) for applicants applying for Sections 5310, 5311 and 5316 Programs. Help features are provided within the application.

This process operates as follows:

1. In July each year, DOTD Public Transit releases the online application. Statewide public notice is issued by DOTD announcing the funding opportunity, announced Coordination meetings, in areas of the state where there are no existing providers, eligible applicants which have formally indicated an interest in the program are

notified of program opportunities and the potential availability of funding. All minority transit organizations that meet the eligibility criteria listed in State Management Plans are encouraged to apply and DOTD assistance is available upon request. Such new requests are treated in accordance with the established priority system.

2. Existing and prospective new applicants prepare and submit complete applications through STTARS. State program personnel are available to provide assistance and advice to interested program participants.
3. Applications are submitted to DOTD no later than November 1st in order to allow adequate processing time.
4. Pre-award accounting system surveys for any new applicants will be performed to ensure adequate financial and managerial capability. Based upon Federal funding levels and utilizing the most current Federal and State auditing requirements, DOTD obtains an appropriate audit from all existing providers on an annual or biennial basis.
5. New Start Site Visits will be conducted prior to the approval of the application for any new applicants.
6. DOTD Public Transportation Section program staff begin technical review and evaluation of applications as they are received. Recommendations for any necessary project revisions are completed together with proposed budget allocations for each project.
7. Applicants are required to publish public notices on proposed operating and/or capital project applications. The notices invite any interested public or private transit or paratransit operator within the service area to comment.
8. DOTD submits a listing of projects and of all public and private transportation providers within each project service area to the U.S. Department of Labor for the Section 5311 applicants.
9. DOTD finalizes its proposed Program of Projects and submits it to FTA by March 31.
10. FTA reviews and approves applications and awards grants by the end of July.
11. During the FTA review and approval process, DOTD initiates and completes necessary contract agreements with applicants identified in the Program of Projects. Agreements become effective upon FTA approval.
12. For capital grant requests, DOTD reviews and updates as needed the vehicle specifications. The Division of Administration initiates the procurement processes



and DOTD participates by attending pre-bid conferences.

13. Following issuance of bid awards by the Division of Administration, vehicles are ordered. Delivery of all vehicles is made to DOTD for inspection and to insure conformance with vehicle specifications.
14. Prior to issuance, recipients provide DOTD personnel with proof of insurance and submit payments for applicable title/handling fees. The face of each title is stamped to indicate that vehicles were purchased with Federal funds, and a restriction on the transfer of title without DOTD concurrence is filed with the Louisiana Department of Public Safety and Corrections.

#### Section 5303/5304

FTA Section 5303 funds are distributed by formula to each of the MPOs annually once the apportionment is made to LADOTD via the Federal Register. Section 5304 funds are used by the Public Transportation Section.

#### Section 5339

LADOTD uses the statewide distribution to support small and large urban transit systems. The application is open to small and large urban programs for eligible bus and bus facility programs.

### **Procedures to Provide Technical Assistance to Subrecipients**

The LADOTD Public Transportation Staff are available throughout the year to provide information to interested parties on procedures for participating in the program; technical advice and planning assistance on structuring individual project applications or budgets; and assistance in interpreting and complying with applicable regulatory provisions which pertain to any aspect of the program. Application assistance workshops are conducted each year at the Louisiana Public Transit Conference.

All minority transit organizations that meet the eligibility criteria listed the application are encourage to apply and LADOTD assistance is available upon request.

LADOTD develops model policies and templates to assist subrecipients with compliance with FTA requirements, including a Title VI plan template; drug and alcohol testing policy, Safety, Security and Emergency Preparedness Plans.

LADOTD's Public Transportation Section utilizes Rural Transportation Assistance Program (RTAP) funding to provide training, technical assistance, research and support services related to public transportation in non-urbanized areas. The State RTAP Advisory Committee will provide recommendations to DOTD on how best these funds may be put to use by the State. A periodic needs survey will be conducted, generally during the Annual Public Transportation Conference, of the current providers to ensure that training and technical assistance is provided which address provider needs.

Section 5304 funds are available to MPOs for transit planning studies. LADOTD developed public transit human services transportation coordination plans for each MPO to assist in the developing the appropriate level of service in accordance with the demographic needs for each region.



# Exhibit 1: LADOTD Compliance Section Organization Chart

