

Exhibit A

Title VI Plan

Prepared by
LAFAYETTE CONSOLIDATED GOVERNMENT

**705 West University Ave Division 1211
PO Box 4017-C
Lafayette, LA 70502**



Ph: 337-291-8410
Fx: 337-291-8415
<http://lafayettela.gov/>



DR

Mayor-President Joel Robideaux	Chief Transportation Engineer Warren Abadie	PZD Director Danielle Breaux
Chief Administrative Officer Lowell Duhon	Transit Manager Mike Mitchell	Planning Manager Cathie Gilbert
Title VI/ADA Coordinator Shaun Williams	Transit Planner Terry Hurd	Planner II Kirk Trahan

Lafayette City-Parish Consolidated Government

Title VI/ADA Compliance Policy

Statement

Lafayette Consolidated Government, in its administration of government functions, shall actively ensure nondiscrimination under Title VI of the Civil Rights Act of 1964. Title VI states “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Additionally, assurances within Title VI also include gender and physical handicap in the characteristics protected against discrimination. The responsibility to ensure compliance shall be vested with the Chief Administrative Officer (CAO), all Directors, and employees of LCG. The CAO has specifically identified LCG’s ADA/Title VI Coordinator to be responsible in monitoring and initiating actions to ensure compliance with these Federal regulations.

Executive Order 12898, issued in 1994, further amplifies Title VI requiring “Environmental Justice” as part of its mission “by identifying and addressing, as appropriate, disproportionately high or adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Further, planning regulations 23 CFR 450.316 (a)(1)(vii) require the needs of those traditionally underserved by existing transportation services, such as low-income and minority households that may face challenges accessing employment and other services, be sought out and considered.

LCG’s ADA/Title VI Coordinator shall be responsible for assembling required reports and implementing the plans described in Exhibit A (ADA Action Plan to implement Self-Evaluation and Transition Plans) and Exhibit B (Title VI Plan).

LCG’s ADA/Title VI Coordinator, through the CAO’s office, shall comply with the tasks, reports, and related tasks identified within Exhibit A and Exhibit B (which are included as attachments). Each Director, if contacted by the ADA/Title VI Coordinator, shall cooperate and assist with efforts identified by the Coordinator in addition to establishing new procedures of processes consistent with the requirements identified in Exhibit A and Exhibit B.

Shaun Williams is the designated ADA/Title VI Coordinator and is vested with the responsibility and authority for the implementation and enforcement of the policy with Department Heads sharing this responsibility.

Mr. Lowell Duhon, CAO

Date

TABLE OF CONTENTS

CHAPTER 1

- 1.0 Title VI Policy Statement and Authorities
 - 1.1 Policy Statement
 - 1.2 Authorities

CHAPTER 2

- 2.0 What is the Lafayette Consolidated Government?
 - 2.1 Lafayette City-Parish Council

CHAPTER 3

- 3.0 Purpose of This Document
 - 3.1 Objectives

CHAPTER 4

- 4.0 Organization and Staffing of LCG

CHAPTER 5

- 5.0 General Responsibilities of the Title VI Coordinator under Title VI
 - 5.1 General Title VI Program Responsibilities
 - 5.1.1 Data collection
 - 5.1.2 Developing and Submitting Title VI Program
 - 5.1.3 Annual Title VI Report
 - 5.1.4 Annual Review of Title VI Program
 - 5.1.5 Dissemination of Information Related to the Title VI Program
 - 5.1.6 Assist DOTD with Resolution of Complaints
 - 5.2 General Responsibilities of the Title VI Coordinator

CHAPTER 6

- 6.0 Program Area Responsibilities
 - 6.1 Communications & Public Participation
 - 6.1.1 Operational Guidelines
 - 6.1.2 Principles of LCG's Communications
 - 6.1.3 Elements of LCG's Communications
 - 6.1.3.1 Web Sites
 - 6.1.3.2 Civic Functions and Information Request
 - 6.1.3.3 Opportunities for Public Comments
 - 6.1.3.4 Strategies for Engaging Title VI Protected Groups
 - 6.1.3.5 Limited English Proficiency and Language Distribution
 - 6.1.4 Responsibilities of the Title VI Coordinator
 - 6.2 Council Process
 - 6.2.1 Key Planning and Programming Activities
 - 6.2.2 Major Programs
 - 6.2.2.1 General Council Agenda Items
 - 6.2.2.2 Annual Budget Preparation
 - 6.2.2.3 Policy, Plan, and Project Review

- 6.2.2.4 Technical Services and Regional System Data
- 6.2.2.5 Communications and Information Services
- 6
- 6.2.3 Title VI Coordinator's Responsibilities for Transportation Planning
- 6.3 Environmental Affairs
 - 6.3.1 Title VI Coordinator's Responsibilities for Environmental Affairs
- 6.4 Consultant Contracts
 - 6.4.1 Contract Procedures
 - 6.4.2 Title VI Coordinator's Responsibilities
 - 6.4.2.1 Remedial Action Related to Consultant Reviews
- 6.5 Education & Training
 - 6.5.1 Employees Encouraged to Participate in Training
 - 6.5.2 Title VI Coordinator's Responsibilities

CHAPTER 7

7.0 Questions

APPENDICES

A.0.0 Index to Appendices

Appendix A - Title VI Methodology for Identification of Target Populations

- A.1.0 Introduction
- A.2.0 Target Groups
- A.3.0 Monitoring

Appendix B - Assurances

- B.1.0 Title VI Assurances
- B.2.0 Title VI Required Language
 - B.2.1 Part 1 - Contractual Provisions
 - B.2.2 Part 2 - Deeds
 - B.2.2.1 Granting Clause
 - B.2.2.2 Habendum Clause
 - B.2.3 Part 3 - Leases

Appendix C - Title VI Public Notice

- C.1.0 Title VI Notice to the Public
- C.2.0 Title VI Notice to the Public in Spanish

Appendix D - Policy & Plan For Engaging Individuals With Limited English

- D.1.0 Limited English Proficiency Policy
- D.2.0 Certification
- D.3.0 Limited English Proficiency Plan
 - D.3.1 Federal Guidelines
 - D.3.2 Population Analysis: The Four Factor Test
 - D.3.2.1 Number and Proportion of LEP Persons
 - D.3.2.2 Frequency of Contact with LEP individuals

- D.3.2.3 Nature and Importance of the Program
- D.3.2.4 Resources and Overall Costs
- D.4.0. Safe Harbor Stipulation
- D.5.0. Limited English Proficiency (LEP) Policy and Plan
- D.6.0 Identification of a LEP Person
- D.7.0 Language Assistance Measures
- D.8.0 Staff Training
- D.9.0 Outreach Techniques
- D.10 Monitoring and Updating the LEP Plan
- D.11 Dissemination of the LCG Limited English Proficiency Plan

Appendix E - ADA Notices

- E.1.0 Certification
- E.2.0 Modifications to Policies & Procedures
 - E.2.1 Effective Communication
 - E.2.2 ADA Notice to Be Posted At the Bottom of LCG Meeting Notices

Appendix F - DBE Policy Participation by Disadvantaged Business Enterprises

- F.1.0 DBE Clause to Be Included Within the Body of Future Contracts

Appendix H- Discrimination Complaint Process and Form Complaint Process

- H.1.0 Complaint Log
- H.2.0 Intimidation and Retaliation
- H.3.0 Time Frames
 - H.3.1 Complainant
- H.4.0 Contact Information for DOTD Title VI and ADA Compliance
- H.5.0 Title VI Discrimination Complaint Form
- H.6.0 Complaint Procedure

Appendix I - Title VI Training Opportunities

- I.1.1 One-Day Course
- I.1.2 Two-Day Course
- I.1.3 Two-Day Course
- I.1.4 Two-Day Course
- I.1.5 Two-Day Course
- I.1.6 Online Training Materials
- I.2.0 Training Completed

Appendix J - Current Staff and Organization

- J.1 Title VI & ADA Coordinator
- J.2 Supervision, Position, Race, and Gender of Staff
- J.3 DOTD Compliance Staff

Appendix K - List of Title VI Investigations, Complaints and Lawsuits

Appendix L - Demographic Profile and Data Tables

Appendix M - Demographic Profile and Data Tables for Lafayette Parish

Appendix N - Maps of the City of Lafayette and the Unincorporated Areas of the Parish

LIST OF TABLES

Table 1

Language Spoken at Home, Lafayette Parish

Table 2

Age by Language Spoken, Lafayette Parish

Table 3

Lafayette City-Parish Council Member Profile

Table 4

LCG Supervision, Position, Race, Gender and National Origin of Staff

Table 5

LCG Title VI Organizational Chart

Table 6

List of Transit Related Title VI Investigations, Complaints and Lawsuits

1.0 Title VI Policy Statement and Authorities

1.1 Policy Statement

The Lafayette Consolidated Government (LCG) 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 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs or activities, whether those programs and activities are federally funded or not (inclusive of additional Title VI Authorities and citations).

More specifically, the Lafayette Consolidated Government (LCG) assures that efforts will be made to preclude discrimination through the disparate impacts of its programs, policies, and activities on minority and low-income populations. Additionally, the LCG will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

Lafayette Consolidated Government (LCG) Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other MPO responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21. ADA and Title VI inquiries should be forwarded to the address on the title page.

This statement of policy is acknowledged by the Chief Administrative Officer (CAO) of Lafayette Consolidated Government (LCG) in the letter of transmittal from the Lafayette Consolidated Government (LCG) to the Louisiana Department of Transportation and Development (DOTD).

1.2 Authorities

Title VI of the Civil Rights Act of 1964 created a foundation for future environmental justice regulations. Since the establishment of Title VI, environmental justice has been considered in local, state and federal transportation projects. Section 42.104 of Title VI and related statutes require Federal agencies to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, national origin, income, gender, age, and disability.

The National Environmental Policy Act of 1969 (NEPA) addresses both social and economic impacts of environmental justice. NEPA accentuated the necessity of supplying safe, healthful, productive and aesthetically appealing surroundings, and provides a requirement for taking a systematic, interdisciplinary approach in considering environmental and community factors in decision making.

The Civil Rights Restoration Act of 1987 further expanded Title VI to include programs and activities of Federal aid recipients, sub-recipients and contractors whether those programs and activities are federally funded or not. On February 11, 1994, President Clinton signed Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This executive order directed Federal agencies to make Environmental Justice part of its mission by identifying and addressing programs, policies and activities that affect human health or the environment so as to identify, meliorate or circumvent disproportionately high and adverse effects on minority and low-income populations.

Rather than being reactive, Federal, State, local and tribal agencies must be proactive when it comes to determining superior methods to serve the public, who rely on transportation systems and services to augment and support their quality of life.

In April 1997, as a reinforcement to Executive Order 12898, The United States Department of Transportation (DOT) issued an Order on Environmental Justice (DOT Order 5610.2), which summarized and expanded upon the requirements of Executive Order 12898 to include policies, programs and other activities that are undertaken, funded or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) or other U.S. DOT components.

In December 1997, the FHWA issued the FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order 6640.23), which mandated the FHWA and its subsidiaries to implement the principles of Executive Order 12898 and U.S. DOT Order 5610.2 into its programs, policies and activities.

On October 7, 1999, the FHWA and the FTA issued a memorandum Implementing “Title VI Requirements in Metropolitan and Statewide Planning.” This memorandum provides clarification for field offices on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally paramount during the planning stages as it is during the project development stages.

2.0 What is the Lafayette Consolidated Government (LCG)?

The Lafayette Consolidated Government (LCG) provides government services to residents of the City of Lafayette and the unincorporated areas of Lafayette Parish. The Lafayette City-Parish Council is also the governing board of Lafayette Utilities System which provides electrical services for the City of Lafayette and very small portions of the unincorporated areas as well as parish-wide for potable water. As a local government, city-parish council provides governmental services for the City of Lafayette and the unincorporated areas of Lafayette Parish.

The Lafayette Consolidated Government (LCG) Planning Division performs planning for the city of Lafayette and the unincorporated areas. The Title VI and the ADA Coordinator works on planning issues as well.

Lafayette City-Parish Council serves as LCG’s advisory committee. It is comprised of nine elected officials.

2.1 LCG Lafayette City-Parish Council

As stated above, Lafayette City-Parish Council serves the advisory committee in the LCG transportation planning process. The Lafayette City-Parish plays a vital role in the community outreach and public education process.

The members of the Lafayette City-Parish Council are listed in Appendix G.

3.0 Purpose of This Document

The purpose of this document is to communicate the Lafayette Consolidated Government (LCG) plan for addressing the Federal and state non-discrimination requirements under Title VI, Federal Executive Order 12898 and other related regulations and statutes. This document has a companion document of equal importance: the LCG Citizen Information and Participation Program (CIPP). In tandem, these documents describe the LCG’s plan and approach for addressing the requirements of Title VI. Although they are separate topics, Environmental Justice and Public Participation are closely intertwined issues and complement one another in ensuring fair and equitable distribution of transportation services and facilities.

Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to ascertain the project's success. Effective public participation not only provides transportation officials with novel ideas, but it also alerts them to potential environmental justice concerns during the planning stage of a project. Perhaps the most important charge of public participation is to engender a sense of ownership among those populations directly and indirectly affected by a project.

3.1 Objectives

Below are five objectives for the Lafayette Consolidated Government (LCG) as they pertain to Title VI, environmental justice and public input.

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations.
2. Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including socio-economic effects, on minority and low-income populations.
3. Provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of the Lafayette Consolidated Government (LCG).
4. Ensure full and fair participation by potentially affected communities in the transportation decision-making process.
5. Inform and educate citizens and other interested parties about ongoing Lafayette Consolidated Government's (LCG's) planning activities and their potential role in those activities.

4.0 Organization and Staffing of LCG

The Lafayette Consolidated Government Public Works and Planning, Zoning and Codes Department are responsible for transportation planning and coordination as a subunit of the Lafayette Consolidated Government.

The Lafayette Consolidated Government has a diverse and experienced staff reflective of the diverse community in its service area.

The staff is responsible for transportation planning and coordination employees of Lafayette Consolidated Government.

The current staff is listed in Appendix J, Organization and Staffing of LCG, as of the date of this plan.

5.0 General Responsibilities of the Title VI Coordinator under Title VI

In addition to other planning responsibilities within the Lafayette Consolidated Government (LCG), the Title VI Coordinator shall act as a champion for removing obstacles both to the letter as well as to the spirit of Title VI so as to facilitate and enact substantive compliance.

The Coordinator shall advocate compliance and report on the status of that compliance to the local government department head in charge of compliance within their departments, the executive administration of the chief elected official, the Lafayette Consolidated Government (LCG), FTA, FHWA, and to the public.

5.1 General Title VI Program Responsibilities

The Title VI Coordinator is responsible for ensuring these elements of the plan are appropriately implemented, and maintained:

1. Complaint Procedures
2. Title VI Notice to the Public
3. Records of Title VI Investigations, Complaints or Lawsuits
4. Demographic Data
5. Service Standards
6. Service Policies
7. Title VI Plan
8. Title VI Triennial Update

5.1.1 Data collection

Demographic data on race, age, color, national origin, income level, language spoken, disability, and sex of the region's population is to be collected and maintained by the PZD. This demographic data will be used to develop public outreach efforts and to conduct environmental justice analyses, as needed. All demographic reports will utilize the most current version available of datasets from the American Community Survey and the U.S. Census Bureau.

5.1.2 Developing and Submitting Title VI Program

LCG through Lafayette Transit System shall develop and submit a Title VI program in accordance with FTA guidelines triennially by June 1st. The Title VI plan ensures compliance on a number of issues for the recipient, its sub recipients, and contractors, as specified in the FTA C 4702.1B. The document is to include:

- 1) Introduction
- 2) Overview of LCG's program/services
- 3) A copy of LCG's Title VI notice to the public that indicates LCG complies with Title VI. This notice is available in English and Spanish.
- 4) A copy of LCG's instructions and procedures to the public regarding how to file a Title VI discrimination complaint and including a copy of the complaint form. The forms are available in English and Spanish.
- 5) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the sub recipient since the time of the last submission.

- 6) A public Participation Plan that includes on outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts since the last Title VI Program submission.
- 7) A copy of LCG's plan for providing language assistance to persons with limited English proficiency.
- 8) LCG's transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by LCG, as well as, provide a table depicting the racial breakdown of the membership of those committees.

5.1.3 Annual Title VI Report

An Annual Title VI Report is to be submitted by the end of October each year, to DOTD's Compliance Programs Director, the Federal Highway Administration (FHWA), and the Federal Transit Authority (FTA). The document is to include:

- 1) Title VI complaint procedures (complaints will be submitted to/filed with DOTD; the LCG will not process complaints.);
- 2) Record of Title VI investigations, complaints or lawsuits (investigations will be conducted by DOTD with the LCG in a supporting role);
- 3) Plan to involve persons with Limited English Proficiency (LEP);
- 4) Title VI notice to the public; and
- 5) A summary of public outreach and involvement activities and a description of steps taken to ensure that minority and disadvantaged persons had meaningful access to these activities.

A DOTD questionnaire is sent to LCG each May and is to be submitted each year as of June 15.

5.1.4 Annual Review of Title VI Program

Each year, in preparing for the Annual Title VI Report, the Title VI Coordinator will review LCG's Title VI program to assure compliance with Title VI. In addition, the Coordinator will review agency operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate.

The Title VI Program and associated Appendices will be revised every five years or as appropriate, as policies and procedures change.

5.1.5 Dissemination of Information Related to the Title VI Program

Information on the agency's Title VI program is to be disseminated to LCG employees, contractors, and beneficiaries, as well as to the public, as described in the Program Area Responsibilities section of this document, and in other languages when required.

5.1.6 Assist DOTD with Resolution of Complaints

Any individual may exercise his or her right to file a complaint about the LCG policies, plans or practices, if that person believes that she/he or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, income, gender, age, and disability. The LCG will work diligently in a supportive role to DOTD's Title VI Compliance Team to resolve complaints using the DOTD's Complaint Processing Procedures. The Title VI complaint process and Title VI Discrimination Complaint Form are presented in Appendix H.

5.2 General Responsibilities of the Title VI Coordinator

The Title VI Coordinator is responsible for advocating the required action in implementing, monitoring, and reporting on LCG's compliance with Title VI regulations. In support of this, the Title VI Coordinator will:

- 1) Be a Title VI advocate in the identification, investigation, and elimination of discrimination when found to exist.
- 2) Investigate complainants with assistance from DOTD's Compliance team. The Coordinator will supply phone numbers and email addresses to complainants for contacting the proper DOTD authorities adhering to the timeframes in the complaint process.
- 3) Meet with other LCG staff, as needed, to train, monitor and discuss progress, implementation, and compliance issues.
- 4) Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- 5) Work with other LCG staff to develop and submit the Annual Title VI Report to DOTD, FHWA, and FTA by the end of October each year and complete a DOTD Title VI questionnaire sent in May for completion as of June 15 of each year.
- 6) Contact consultants who are under contract to LCG to report and inquire on the status of compliance with Title VI.
- 7) Identify the deficiency status and develop a remedial action plan if necessary when a consultant under contract to LCG is found to be noncompliant with Title VI.
- 8) Review important Title VI-related issues with the Lafayette City-Parish Council.
- 9) Assess communications and public involvement strategies to determine the participation of impacted Title VI protected groups and address additional language needs, as appropriate.
- 10) Identify and report on the status of communications and public participation efforts to comply with Title VI.

¹ A complaint must be filed no later than 180 days after the alleged discrimination.

6.0 Program Area Responsibilities

The Lafayette Consolidated Government (LCG) has the following program areas in which Title VI effects the delivery of public services as indexed by their major section numbers:

- 6.1 Communications & Public Participation
- 6.2 Transportation Planning & Programming of Roadways
- 6.3 Environmental Affairs
- 6.4 Consultant Contracts
- 6.5 Educational Services

6.1 Communications & Public Participation

The goal of the Lafayette Consolidated Government's (LCG's) communications and public participation program is to ensure early and continuous public notification about, and participation in, major actions and decisions by the LCG. In seeking public comment and review, the LCG makes a concerted effort to reach segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes.²

The Lafayette Consolidated Government (LCG) utilizes a broad range of public information and participation opportunities, including dissemination of proposals and alternatives, process for written comments, public meetings after effective notice, settings for open discussion, communication programs, information services, and consideration of and response to public comments.

6.1.1 Operational Guidelines

The Lafayette Consolidated Government (LCG) has a Public Participation Plan and a Limited English Proficiency (LEP) Policy which guides the implementation of the Title VI Plan.

6.1.2 Principles of LCG's Communications & Public Participation Program

The principles of the LCG's Communications & Public Participation Program can be stated as follows:

- 1) Equal access is an essential part of the public participation process.
- 2) No major public policy decision is reached or large project implemented without significantly affecting some stakeholders.
- 3) Professionals do not have a monopoly on viable solutions.
- 4) Even if a project or policy decision is sensible and beneficial, it must be arrived at in accordance with public process to be acceptable.
- 5) People are much more willing to live with a decision that affects different interests unequally if the decision-making process is transparent, objective, and equitable.
- 6) If relevant information necessary for making an informed decision is not provided, the public will rely on and trust others.

- 7) Interacting with an official representative of an organization or group is no substitute for interacting directly with the members of said organization, group, or neighborhood.
- 8) Effective public notification and participation takes time and effort, and can be expensive, yet is essential to sound decision-making and consensus building

² The Communications & Public Participation Program Area applies to and affects the LCG work program as a whole, particularly agency efforts and responsibilities related to the Planning & Programming and Environmental Affairs Program Areas. It has been treated as a separate program area for purposes of clarity. (See the LCG's Public Participation Plan for more details.)

6.1.3 Elements of LCG's Communications & Public Participation Program

This section deals with the following subsections:

- 6.1.3.1 Web Site
- 6.1.3.2 Civic Functions and Information Request
- 6.1.3.3 Opportunities for Public Comments
- 6.1.3.4 Strategies for Engaging Title VI Protected Groups
- 6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish

6.1.3.1 Web Sites

The Lafayette Consolidated Government (LCG) maintains a website³, which is updated frequently to keep the public informed. The site contains information on the agenda, membership and operation of advisory committees, as well as the LCG's Title VI Notice to the Public. The website is enabled with a Google Translator widget to translate the website's text into a variety of global languages. Additionally, the website has the following major sections:

Plans

- f. Adopted Plans
- g. Proposed Plans

Public Transit Website

- m. Accessibility Features
- n. Cyclists Information
- o. General Information and Tips
- p. Online Bus Tracking
- q. Daytime Routes
- r. Night Service

The Title VI Plan and complaint procedures (via links to DOTD) will be posted upon approval of the plan by the DOTD. The Title VI area on the LCG website will be the central location for the Title VI and ADA communications. The provisional web site address of the Title VI and ADA area is: <http://www.ridelts.com>. The user may also contact members of the staff on specific topics of interest either by phone or by email.

The notices to be posted on the website are found in Appendix C, Sections C.1.0 General Title VI Notice to the Public and C.2.0 Abbreviated Title VI Notice to the Public; and in Appendix D, Section

D.5.0 Limited English Proficiency (LEP) Policy and Plan and the French and Spanish notices listed in Section D.9.0 Outreach Techniques.

6.1.3.2 Civic Functions and Information Request

The Lafayette Consolidated Government (LCG) staff regularly answers questions and responds to requests for information from citizens, businesses, and staff from cities, agencies, and organizations throughout the rural and urbanized areas of the City of Lafayette and the unincorporated areas of Lafayette Parish .

All Lafayette City-Parish Council meetings are open to the public and follow public meeting law. Time for citizen comments is reserved at meetings and announced by the meeting chair. Meeting dates and times are posted well in advance on the LCG's website, published in official newspapers and journals of record, and communicated in frequent LCG emails to which any citizen may subscribe. The LCG also strives to accommodate persons of limited English proficiency (LEP). Appendix D contains LCG's LEP Plan and Policy.

All meeting agendas will contain the following statement upon approval of the plan by the DOTD and integrated in the clerical processes of the LCG's staff.

ADA Notice: For special accommodations for this meeting, contact the LCG's ADA Coordinator via ((337) 291- 8410) at least 72 hours in advance. ⁵

The Lafayette Consolidated Government (LCG) routinely provides opportunities for public comment, and continues to work to find new and innovative ways to solicit public comments and involve segments of the population within its region. Comments are accepted by phone, fax, email, US mail, Internet, and in person at any meetings. Moreover, LCG sends out direct mail to persons being affected by transportation projects and convenes meetings with stakeholders affected by projects. Civic functions such as public meetings, public hearings, workshops and forums are held as needed for large transportation projects affecting the public.

The Lafayette Consolidated Government (LCG) holds public hearings during major updates to the region's adopted transportation plans and the adopted regional growth and transportation strategy. Minor plan updates occur several times a year; major plan updates occur with less frequency. Public hearings are held when the LCG acts on LCG actions, in the form of ordinances and resolutions when policy and plans are considered for adoption. At that time, the public often comments on plans, policies and allocation of funds.

⁵ The notice will be updated with the current contact phone number from the ADA and Title VI Coordinator as listed in Appendix J of this document.

6.1.3.3 Opportunities for Public Comments

Lafayette City-Parish Council routinely offers four different means for people to comment on activities, programs, and decisions made at the agency.

- 1) Comments are accepted via phone, fax, email, U.S. mail, and in person at any board or committee meeting. Contact information for staff is provided on the agency website. The Lafayette City-Parish Council and LCG staff responds to comments received.
- 2) All Lafayette City-Parish Council meetings are open to the public and follow Louisiana public meeting law. The LCG staff attends and presents at numerous meetings per year. The meeting dates are posted well in advance on the agency's web site in compliance with requirements of state public meeting law and in the LCG's frequent emails. Time for citizen comments is allocated on meeting agendas, and the meeting chair requests citizen comments at least once in every meeting. No advance notice is required to speak during the citizen comment period at any of the meetings. Public comments and responses made during these times are kept on record in the official meeting summaries.
- 3) Formal public comment and review periods are used to solicit comments on major planning and programming activities; Generally, information is reviewed by Lafayette City-Parish Council meeting for a formal public comment period. The comment period is included in the LCG public notices of the proposed meeting agenda and on the website. Comments can be made in person at any LCG meeting, using a comment form on the agency's website, by email, by US mail, fax, or telephone. The LCG responds to comments received, and forwards comments to other agencies for a response as appropriate. Comments continue to be accepted until the close of the comment period, which is generally no less than two weeks prior to the item's schedule for action, comments and responses received throughout the comment period are reviewed and considered prior to action by the Lafayette City-Parish Council.
- 4) LCG has also established additional public participation opportunities through its Comprehensive Plan work, opportunities which are both ongoing as well episodic.

Through its neighborhood planning process, planning staff in the Planning, Zoning and Development Department has identified and works with various neighborhoods throughout the community. Certain neighborhoods have an organizational partnership between the neighborhood residents, businesses, institutions, and LCG. The organizational structure of a LCG -designated neighborhoods seeks to engage involved parties in the development of neighborhood plans that are community-lead. As outlined in the Comprehensive Plan, some neighborhood-planning goals are achieved on a parish wide basis, while other goals are achieved on a neighborhood level.

Planning staff currently work in three downtown neighborhoods that are generally minority populations with low to moderate incomes. The neighborhood planning group meets monthly and has established substantial email databases that are frequently used by staff to alert the group and interested community members about events and information. Facebook is used by some groups to publicize events and encourage participation in various meeting and public events.

In addition, LCG planning staff will extend occasions for civic participation through episodic planning events and outreach such as on the I-49 Connector Action Plan, various transportation corridor studies, and identified planning initiatives. Each of these efforts includes a public information and participation component extended to all community residents, however their durations are temporary and usually do not exceed 24 months.

6.1.3.4 Strategies for Engaging Title VI Protected Groups

The Lafayette Consolidated Government (LCG) uses postal and electronic mailing lists to disseminate information and give notice for public comment opportunities. Title VI groups are added to the agency's postal and electronic mailing lists regularly, as they are identified. Both mailing lists include community groups that represent Title VI protected groups throughout the region.

The LCG also issues press statements through ongoing relationships with the press who publish weekly and daily newspapers whose readership may include Title VI protected groups.

6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish

According to Department of Justice guidance, LCG should consider providing materials in a different language if over 5% of the affected population speaks that language at home or 1,000 speakers of languages other than English exist. The following four tables contain a discussion of the absolute number of speakers and percentage of speakers other than English. The implication of these statistics is a statement of policies outlined in Appendix D, which state that translators will be provided for French, Spanish and Vietnamese speakers who request those services. Moreover, the LCG's website is enabled with a Google Translator widget so that the website's text can be automatically translated into a variety of global languages.

As defined in this document is to provide translators for monolingual speakers of languages other than English. The Lafayette Consolidated Government has staff who can communicate effectively with speakers of Cajun French, Creole, and Standard French and renders services to speakers requesting these languages. Spanish, Vietnamese, and American Sign Language (ASL) can be requested if notice is given by the speaker or by an interested party within 24 hours of a request for public services or before a public meeting. For languages other than French, Spanish, Vietnamese and ASL, services should be requested three full days before a public meeting so that a translator in that community can be identified and their competence evaluated.

The 2010 census reported a precipitous decline of French speakers in Louisiana from the 2000 speakers. Presumably, this is a consequence of the of older, Cajun French speaking populations.

These policies and the statistical distribution of language speakers within Lafayette Parish are based on an analysis of languages speakers in Lafayette Parish.

Subject	Lafayette parish, Louisiana			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Total population	228,084	*****	228,084	(X)

Subject	Lafayette parish, Louisiana			
	Estimate	Margin of Error	Percent	Percent Margin of Error
RACE				
Total population	228,084	*****	228,084	(X)
One race	223,737	+/-778	98.1%	+/-0.3
Two or more races	4,347	+/-778	1.9%	+/-0.3
One race	223,737	+/-778	98.1%	+/-0.3
White	159,832	+/-543	70.1%	+/-0.2
Black or African American	58,715	+/-643	25.7%	+/-0.3
American Indian and Alaska Native	445	+/-126	0.2%	+/-0.1
Cherokee tribal grouping	13	+/-33	0.0%	+/-0.1
Chippewa tribal grouping	24	+/-27	0.0%	+/-0.1
Navajo tribal grouping	19	+/-32	0.0%	+/-0.1
Sioux tribal grouping	0	+/-28	0.0%	+/-0.1
Asian	3,412	+/-270	1.5%	+/-0.1
Asian Indian	512	+/-234	0.2%	+/-0.1
Chinese	721	+/-326	0.3%	+/-0.1
Filipino	223	+/-125	0.1%	+/-0.1
Japanese	31	+/-37	0.0%	+/-0.1
Korean	165	+/-98	0.1%	+/-0.1
Vietnamese	1,327	+/-426	0.6%	+/-0.2
Other Asian	433	+/-247	0.2%	+/-0.1
Native Hawaiian and Other Pacific Islander	50	+/-74	0.0%	+/-0.1
Native Hawaiian	50	+/-74	0.0%	+/-0.1
Guamanian or Chamorro	0	+/-28	0.0%	+/-0.1
Samoan	0	+/-28	0.0%	+/-0.1
Other Pacific Islander	0	+/-28	0.0%	+/-0.1
Some other race	1,283	+/-467	0.6%	+/-0.2
Two or more races	4,347	+/-778	1.9%	+/-0.3
White and Black or African American	1,617	+/-440	0.7%	+/-0.2
White and American Indian and Alaska Native	923	+/-220	0.4%	+/-0.1
White and Asian	717	+/-261	0.3%	+/-0.1
Black or African American and American Indian and Alaska Native	214	+/-139	0.1%	+/-0.1
Race alone or in combination with one or more other races				
Total population	228,084	*****	228,084	(X)
White	163,686	+/-736	71.8%	+/-0.3
Black or African American	61,047	+/-354	26.8%	+/-0.2
American Indian and Alaska Native	2,026	+/-438	0.9%	+/-0.2
Asian	4,190	+/-66	1.8%	+/-0.1
Native Hawaiian and Other Pacific Islander	146	+/-100	0.1%	+/-0.1
Some other race	1,921	+/-581	0.8%	+/-0.3
HISPANIC OR LATINO AND RACE				
Total population	228,084	*****	228,084	(X)
Hispanic or Latino (of any race)	9,449	*****	4.1%	*****
Mexican	4,323	+/-698	1.9%	+/-0.3
Puerto Rican	447	+/-201	0.2%	+/-0.1
Cuban	479	+/-243	0.2%	+/-0.1
Other Hispanic or Latino	4,200	+/-651	1.8%	+/-0.3
Not Hispanic or Latino	218,635	*****	95.9%	*****
White alone	152,624	+/-49	66.9%	+/-0.1

Subject	Lafayette parish, Louisiana			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Black or African American alone	58,216	+/-602	25.5%	+/-0.3
American Indian and Alaska Native alone	442	+/-125	0.2%	+/-0.1
Asian alone	3,412	+/-270	1.5%	+/-0.1
Native Hawaiian and Other Pacific Islander alone	50	+/-74	0.0%	+/-0.1
Some other race alone	246	+/-208	0.1%	+/-0.1
Two or more races	3,645	+/-696	1.6%	+/-0.3
Two races including Some other race	75	+/-61	0.0%	+/-0.1
Two races excluding Some other race, and Three or more races	3,570	+/-677	1.6%	+/-0.3
Total housing units	95,373	+/-245	(X)	(X)

Source: American Community Survey Aggregate Data, 5-Year Summary File, 2006-2010 and Census 2000, Summary File 3, STP 258. The above tables were accessed via the MLA Language Map Data Center: http://www.mla.org/map_data

Further discussion of language is found in Section Appendix D - Policy and Plan for Limited English Proficiency (LEP).

6.1.4 Responsibilities of the Title VI Coordinator for Public Communications

The Responsibilities of the Title VI Coordinator for Public Communications are:

- 1) Be a Title VI champion and advocate the development and distribution of information on Title VI and agency programs to the general public.
- 2) Provide information in languages other than English, as needed.
- 3) Disseminate information to minority media and ethnic/gender related organizations, to help ensure social, economic, and ethnic interest groups in the region are represented in the planning process.
- 4) Include the abbreviated Title VI Notice to the Public (see Appendix C) in press releases and on the website which includes a meeting schedule.
- 5) Notify affected, protected groups of public hearings regarding proposed actions, and make the hearings accessible to residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.

6.2 Transportation and Transit Planning & Programming

As all transit and transportation projects are funneled through the LCG Department of Public Works, Public Works is the recipient of significant federal funds. These funds are used to plan and construct roads, sidewalks, multi-use paths, bridges and highways as well as provide transit services within the city of Lafayette and the unincorporated portions of Lafayette parish. The city is a fixed route transit provider as defined in ITA C 4702.1 B.

6.2.1 Key Planning and Programming Activities

The legislative power of the City-Parish Government shall be vested in a Council consisting of nine (9) members elected from single-member districts for four (4) year terms, one from and by the qualified electors in each district as hereinafter defined.

Through this process, LCG affords all citizens the ability to participate

As part of its standard method of operation, the Council has the following obligations:

6.2.1.1 To meet at least twice monthly

6.2.1.2 Ensure that all meetings (and those of its committees) are open to the public in accordance with the provisions of state law

6.2.1.3 At all regular meetings of the Council, the Council shall operate from an agenda which shall have been published at least two (2) days, excluding Saturdays, Sundays and holidays, prior to the meeting. The agenda for special or emergency meetings shall be made available to the public as soon as practical prior to the meeting.

6.2.1.4 The Council shall provide by resolution a procedure whereby interested persons shall be given an opportunity to be heard at Council meetings on any matter relating to City-Parish Government

6.2.2 Major Programs

Under the “General Powers” Section of the LCG Charter, the City-Parish Government has all the powers, rights, privileges, immunities and authority under the laws of the state. The government shall have and exercise such other powers, rights, privileges, immunities, authority and functions not inconsistent with the charter as may be conferred on or granted to a local governmental subdivision by the constitution and general laws of the state, and more specifically, the government shall have and is hereby granted the right and authority to exercise any power and perform any function necessary, requisite or proper for the management of its affairs, not denied by this charter, or by general state law, or inconsistent with the constitution. As part of its functions, LCG has several major opportunities wherein citizens may participate in the public process: General Council Agenda Items; Annual Budget Preparation; Grant Approvals; Policy Plan Review; technical services and system data; communication and information services.

6.2.2.1 General Council Agenda Items:

The LCG Council meets the first and third Tuesday of each month. Citizens are afforded the opportunity to participate in these proceedings with the only pretext being commentary is limited to items germane to the agenda. However, opportunity is provided for commentary to be made on non-agenda items.

As the Council must approve all grants and applications to both State and Federal entities, it is necessary for these such items to go through this process.

All proceedings are open to the public.

6.2.2.2 Annual Budget Preparation:

In the latter part, as part of its annual budget process, the LCG Administration submits to the Council a proposed budget for its consideration. Through the month of August, the Council holds budget review meetings open to the public. This process is finalized by a public hearing held in the latter part of August.

All proceedings are open to the public.

6.2.2.3 Policy, Plan, and Project Review

The Lafayette City-Parish Council strives to ensure that policy, plan, and project review efforts in the City of Lafayette and the unincorporated of Lafayette Parish are compatible with those of other local governments as well as the State of Louisiana

All proceedings are open to the public, unless otherwise signified

6.2.2.4 Technical Services and Parish Data

Lafayette Consolidated Government provides demographic, economic, travel, and geographic data to member jurisdictions, other agencies, businesses, and the public; assists in planning activities of member jurisdictions; collects, analyzes, maintains, and improves datasets; and identifies, monitors, and forecasts trends. The demographic, economic, and transportation network are modeled to provide prediction on the capacity and demand for future roadways.

6.2.2.5 Communications and Information Services

The Lafayette Consolidated Government develops and provides informational materials on LCG activities and services, and will also assist LCG staff in reaching out to, involving, and meeting the needs of other agencies, businesses, community organizations, and the public.

6.2.3 Title VI Coordinator's Responsibilities for Transportation Planning

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's planning process. In addition, the Coordinator seeks to:

- 1) Be a Title VI champion and advocate the identification of Title VI issues involved in the planning and programming process.
- 2) Report on the status Title VI issues involved in the planning and programming process.
- 3) Prepare and update a demographic profile of the region using the current and appropriate statistical information available on race, income, and other pertinent data. 6
- 4) Develop a process for assessing the distributional effects of transportation investments in the region as part of actions on plan and programming documents.

6.3.1 Title VI Coordinator's Responsibilities for Environmental Affairs

The Title VI Coordinator is responsible for Title VI environmental justice compliance in aspects of LCG's work that triggers environmental review requirements. The Coordinator seeks to:

1) Be a Title VI champion and advocate the identification and report on the status Title VI issues involved in the environmental planning process.

2) Participate in the drafting of Title VI environmental justice compliance of Environmental Impact Statements (EIS) and Environmental Assessments (EA) prepared by LCG and/or LCG consultants.

⁶ The coordinator makes the document available to the public and member agencies on LCG's website and in the Information Center. Appendix A contains an abbreviated Environmental Justice demographic profile for the region.

3) Participate in the analysis of transportation projects regarding the population affected by the action.

4) Participate in the analysis of transportation projects regarding the impacts on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.

5) Disseminate information to the public in accordance with agency public participation procedures. This includes the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

6.4 Consultant Contracts

The Lafayette Consolidated Government (LCG) is responsible for selection, negotiation, and administration of its consultant contracts. The MPO operates under its internal contract procedures and relevant federal and state laws.

6.4.1 Contract Procedures

The Lafayette Consolidated Government (LCG) seeks to follow the following procedures:

1) Title VI text is included in LCG Requests for Proposals (RFP) and contracts.

2) The Disadvantaged Business Enterprises (DBE) Program is referenced in contract documents.

3) The Lafayette Consolidated Government includes DBE text in RFPs and contracts with consultants and notes its DBE policy on the LCG website.

4) The Lafayette Consolidated Government (LCG) provides links to DOTD's list of certified DBEs on its website.

6.4.2 Title VI Coordinator's Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's consultant contracts process. The Coordinator seeks to include Title VI language in contracts and Requests for Proposals (RFP) so as to:

1) Be a Title VI champion and advocate compliance with Title VI guidelines and collaborate with the agencies and individuals responsible for the inclusion of the appropriate text in Appendix B and F in agency contracts.

- 2) Notify contractors that the text in Appendix B and F should be included in subcontracts.
- 3) Advocate and report on the status of the inclusion of the Title VI Notice to the Public included in LCG RFPs.
- 4) Advocate and report on the status of the inclusion of the abbreviated Title VI Notice to the Public in published announcements of the Lafayette Consolidated Government's (LCG) RFPs (such as those published in newspapers).
- 5) Advocate and report on the status of the inclusion of the Title VI Assurances (Appendix B) in LCG RFPs.

6.4.2.1 Remedial Action Related to Consultant Reviews

The Lafayette Consolidated Government (LCG) actively pursues the prevention of Title VI deficiencies and violations and takes the necessary steps to ensure compliance with this Title VI program, both within LCG and with LCG's contractors. In conducting reviews of sub-recipients, if a sub-recipient is found to be noncompliant with Title VI, the Title VI Coordinator will work with the sub-recipient to resolve the identified issues.

If the issues cannot be resolved, the Lafayette Consolidated Government (LCG) will issue a notification of deficiency status and remedial action for the sub-recipient, as agreed upon by the LCG and DOTD, within a period not to exceed 90 calendar days. The LCG will seek the cooperation of the sub-recipient in correcting deficiencies, and will provide the technical assistance and guidance needed for the sub-recipient to comply voluntarily. Sub-recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 calendar days after receipt of the deficiency letter and remedial action, to voluntarily correct deficiencies. If a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the LCG will submit to DOTD, FHWA, and FTA two copies of the case file and a recommendation that the sub-recipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ensure the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the MPO may with DOTD's, FHWA's, and FTA's concurrence initiate sanctions per 49 CFR 21. 7

⁷ Part 21 -- Nondiscrimination In Federally-Assisted Programs of The Department of Transportation -- Effectuation of Title Vi of The Civil Rights Act Of 1964 as posted on the website: <http://www.fhwa.dot.gov/hep/49cfr21.htm> as of the date of this plan.

6.5 Education & Training

Minorities, women, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in employment-related decisions, including opportunities for education and training. See Appendix I for examples.

6.5.1 Employees Encouraged to Participate in Training

All LCG employees are encouraged to participate in professional development and training. Materials received by the agency on training and education opportunities are made available to employees, which includes information on federally funded training, such as courses provided by the National Highway Institute (NHI), the National Transit Institute (NTI), the American Planning Institute of Certified Planner (AICP), the American Planning Association (APA), the American Institute of Architects (AIA), and the American Society of Civil Engineers (ASCE), the Department of Transportation and Development (DOTD), and the Federal Highway Administration (FHWA). In addition, the LCG provides opportunity and training with in-house power users and third party developers for training in the use of software such as ARC Map, and AutoCAD. Moreover, in an effort to encourage professional development, LCG employees participate in a series of conversations sponsored by these professional associations.

6.5.2 Title VI Coordinator's Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the education and training program. DOTD will provide information on training opportunities open to LCG staff and sub-recipients, including information on training provided by NHI and NTI. The

Coordinator seeks to:

- 1) Assist DOTD in the distribution of information to LCG staff on training programs regarding Title VI and related statutes.

- 2) Advocate equal access and participation of LCG employees and interested public participants in the planning process in courses sponsored by the National Highway Institute (NHI, National Transportation Institute (NTI), American Planning Association (APA), ethics courses sponsored by the Louisiana Chapter of the APA, and American Institute of Certified Planners (AICP).

7.0 Questions

For questions on the LCG's Title VI Plan, ADA Plan, the LEP Plan or any related policies and procedures, please contact the LCG's Title VI and ADA Coordinator using the contact information listed in Appendix J of this document.

For information on the LCG's work program or publications, including reports, data forecasting, maps, or other information available for use, contact the LCG Title VI Coordinator using the contact information listed in Appendix J of this document.

For information on any of the above, including current public comment periods and meetings open to the public, visit the LCG's website at www.lafayettela.gov.

APPENDICES

Appendix A - Title VI Methodology for Identification of Target Populations

Appendix B - Title VI Assurances

Appendix C- Title VI Public Notice

Appendix D - Policy and Plan for Limited English Proficiency (LEP)

Appendix E - ADA Notices

Appendix F - DBE Policy

Appendix G - Lafayette City-Parish Council Members

Appendix H - Discrimination Complaint Process and Form

Appendix I - Title VI Training Opportunities

Appendix J - Current Staff and Organization

Appendix K - List of Title VI Investigations, Complaints and Lawsuits

Appendix M - Demographic Profile and Data Tables

Appendix N - Maps of the City of Lafayette and the Unincorporated Areas of the Parish

APPENDIX A - TITLE VI METHODOLOGY FOR IDENTIFICATION OF TARGET POPULATIONS & SPATIAL CONCENTRATIONS OF TARGETED POPULATIONS

A.1.0 Introduction

The geographic basis for Title VI analysis is based on the latest U.S. Census data. For purposes of Title VI analysis, it is desirable to make the analysis on the smallest geographic unit for which data are obtainable for relevant groups. Census data are available at different levels, including political jurisdictions, urban area, place, census tract, block group and block. However, the Census Bureau does not calculate data for all the aforementioned geographical units. The smallest geographical unit that the Census Bureau calculates the appropriate information on each relevant group is the block group level. Therefore, the block group was selected to analyze Title VI issues.

The LCG identifies seven relevant demographic groups for Title VI analysis as described below.

- 1) Low-income;
- 2) Federal Assistance Recipients;
- 3) Minority;
- 4) Elderly;
- 5) Limited English Proficiency (LEP) or English spoken as a second language;
- 6) Disabled populations; and
- 7) Zero car households.

Following the identifications of the relevant groups for analysis, the next step undertaken is to identify the general distribution of each Title VI population group throughout the City of Lafayette and the unincorporated areas of Lafayette Parish and then define where each group is most concentrated. Demographic tables of Lafayette Parish are available in Appendix M below.

⁸ The national poverty guidelines are issued annually by the Department of Health and Human Services.

<http://aspe.hhs.gov/poverty/poverty.shtml>. National poverty guidelines vary based on family size and increases each year due to the Consumer Price Index <http://www.bls.gov/new.release/cip.toc.htm>. The Consumer Price Index is a measure of the average change over time in the prices paid by urban consumers for a market basket of consumer goods and services.

A.2.0 Target Groups

For the purposes of mapping, the following definitions are used:

Low Income - a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines. Persons living in group quarters are not included within this category. ⁸

Federal Assistance Recipients - People who receive grants or federal funds. The assistance might be in the form of public housing, food stamps, support services or persons receiving Temporary Assistance for Needy Families (TANF) funds.

Minority Populations - Persons considered being minorities are identified in the census as people of African, Hispanic, Asian, American Indian or Alaskan Native origin (U.S. Census, STF301/Tb1008 and Tb1011; 1990). Executive Order 12898 and the DOT and FHWA Orders on Environmental Justice consider minority persons as persons to any of the following groups:

Black or African-American - Persons having origins in any of the Black racial groups of Africa, per the 2010 Census Brief.

Hispanic - Persons of Mexican, Puerto Rican, Cuban Central or South American or other Spanish culture or origin, regardless of race.

Asian American - Persons having origins in the Far East, Southeast Asia or the Indian subcontinent.

American Indian and Alaskan Native - Person having origins in North America and who maintains cultural identification through tribal affiliation or community recognition.

Elderly - Persons over the age of 65.

Limited English Proficiency (LEP) - Households with a primary or home language other than English.⁹

People with Disabilities - Persons who have mobility and/or self-care limitations as defined by the Census.¹⁰

Zero car households - Carless households, or households without vehicular access.

A.3.0 Monitoring

This plan is designed to be flexible and is one that can be easily updated. At a minimum, LCG will follow the Title VI Program update schedule for the LEP Plan. The LCG Title VI Coordinator shall prepare a written report to the LCG Chief Administrative Officer at the end of each calendar year identifying LCG's progress as it relates to the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Lafayette parish?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified LCG services? Are there other programs that should be included?
- Have LCG's available resources, such as technology, staff, and financial costs changed?
- Has LCG fulfilled the goals of the LEP Plan? And
- Were any complaints received?

Appendix B - Assurances

TITLE VI ASSURANCE for LAFAYETTE CONSOLIDATED GOVERNMENT

Lafayette Consolidated Government 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, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance.

Lafayette Consolidated Government further assures every effort will be made to ensure nondiscrimination in all of its programs and planning activities, whether federally funded or not.

In the even Lafayette Consolidated Government distributes federal assistance to a consultant, contractor or subcontractor or other participants, Lafayette Consolidated Government will include Title VI language in all written agreements and will monitor the consultant, contractor or subcontractor and other participants for compliance. Lafayette Consolidated Government Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 23 CFR 200 and 49 CFR 21.

Lowell Duhon, Chief Administrative Officer

Date

Shaun Williams, Title VI Coordinator

Date

B.1-0 Title VI Assurances

The Lafayette Consolidated Government (LCG) (hereinafter referred to as the Recipient), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d – 42 USC 2000d – 4 (hereinafter referred to as the Act), and requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, income, gender, age, and disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program:

1. That the Recipient agrees that each program and each facility, as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a program) conducted or will be (with regard to a facility) operated in compliance with requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in proposals for negotiated agreements:

The Lafayette Consolidated Government (LCG), in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d – 42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, assures the following: nondiscrimination in Federally Assisted Programs of the Department of Transportation Issued Pursuant to Such Act, and hereby notifies bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, national origin, income, gender, age, and disability in consideration for an award.

3. That the Recipient shall insert the clauses of Part 1 of this Assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Part 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Part 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of, or access to space on, over, or under, real property acquired or improved under the Federal Aid Highway Program.

8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program, as are found by the State Secretary of Transportation or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance. THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

This statement of policy is acknowledged by the presiding officer of the LCG Council in the letter of transmittal from the Lafayette City-Parish Consolidated Council to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

B.2.1 Part 1 - Contractual Provisions

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

1. Compliance with Regulations

The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as DOT), Title 49, Code of

Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination

The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, income, gender, age, and disability, in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment

In solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, national origin, income, gender, age, and disability.

4. Information and Reports

The Contractor shall provide information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Lafayette Consolidated Government (LCG) or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Lafayette Consolidated Government (LCG), or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance

In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the Lafayette Consolidated Government (LCG) shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

Withholding of payments to the Contractor under the contract until the Contractor complies; and/or cancellation, termination, or suspension of the contract, in whole or in part.

6. Incorporation of Provisions

The Contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontractor or procurement as the Lafayette Consolidated Government (LCG) or the Federal Highway administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that

in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the Lafayette Consolidated Government (LCG) enter into such litigation to protect the interests of the state and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

B.2.2 Part 2 - Deeds

The following clauses shall be included in any deeds affecting or recording the transfer of real property, structures, or improvements thereon, or interest therein from the United States.

2.2.1 Granting Clause

NOW, THEREFORE, the Lafayette Consolidated Government(LCG) (LCG) – as authorized by law, and upon the condition that the state of Louisiana will accept title to the lands and maintain the project constructed thereon, in accordance with and in compliance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways; the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation; and requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252: 42 USC 2000d to 2000d-4) – does hereby remise, release, quitclaim, and convey unto the state of Louisiana the right, title, and interest of the MPO in and to said land described in Exhibit A attached hereto and made a part thereof.

B.2.2.2 Habendum Clause

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

The state of Louisiana, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree, as a covenant running with the land for itself, its successors and assigns, that (1) no person shall, on the grounds of race, color, national origin, income, gender, age, and disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed, (2) that the state of Louisiana shall use the lands, and interests in lands so conveyed, in compliance with requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination of Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended, (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the agency shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in, and become the absolute property of, LCG and its assigns as such interest existed prior to this instruction.

B.2.3 Part 3 - Leases

The following clauses shall be included in deeds, licenses, leases, permits, or similar instruments entered into by LCG pursuant to the regulations cited in this document.

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land, that in the event facilities are constructed, maintained, or otherwise operated on the said

property described in this lease, for a purpose for which a LCG program or activity is extended, or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

The following shall be included in deeds, licenses, leases, permits, or similar agreements entered into by LCG pursuant to the provisions of Assurance 7.

The LESSEE, for himself or herself, his or her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant, and agree as a covenant running with the land, that (1) no person, on the grounds of race, color, national origin, income, gender, age, and disability, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land and furnishing of services thereon, no person on the grounds of race, color, national origin, income, gender, age, and disability, shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the LESSEE shall use the premises in compliance with requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the State shall have the right to terminate the lease and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

APPENDIX C – TITLE VI PUBLIC NOTICE

The paragraph below will be inserted in significant publications that are distributed to the public, such as future versions and updates of the LCG's transportation plans and the LCG's website.

C.1.0 Title VI Notice to the Public

The Lafayette Consolidated Government (LCG) 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 LCG. For more information on LCG's Civil Rights Program and the procedures to file a complaint, please call (337)291-8410; email: swilliams2@lafayettela.gov or visit our transportation administrative office at 101 Jefferson St.; Lafayette, LA 70501. For more information, visit www.ridelts.com.

A complainant may file a complaint directly with the Federal Transit Administration (FTA), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TRC, 1200 New Jersey Ave., SE, Washington DC 20590. Phone: (202)366-4018.

If information is needed in another language, please contact (337)291-8410.

C.2.0 Notificación al Público de los Derechos Garantizados por Título VI

El Lafayette Consolidated Government (LCG) 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 Lafayette Consolidated Government. Para obtener más información sobre el programa de derechos civiles del Lafayette Consolidated Government o para obtener más información sobre los procedimientos para presentar una queja, llame al (337)291-8410. Email: swilliams2@lafayettela.gov o visite nuestra oficina administrativa de transporte en 101 Jefferson St.; Lafayette, LA 70501. Para obtener más información, visite www.ridelts.com.

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, 5th 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 (291)291-8410.

Title VI Notice to the Public is posted on LCG's website, at LCG Rosa Parks Transportation Center, and in sub-recipient transit vehicles.

APPENDIX D -- POLICY AND PLAN FOR ENGAGING INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP)

D.1.0 Limited English Proficiency Policy

The Lafayette Consolidated Government (LCG) policy for engaging individuals with limited English proficiency is to provide translation services to certain persons who request them, if reasonable accommodation can be made.

Linguistic data of populations residing in Lafayette Parish is discussed in Section 6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish. The reader is directed to the tables in that section showing the number and percentages of individuals speaking languages other than English. The tables are discussed in the following sections. Additionally maps are provided for the distribution of linguistic groups.

D.2.0 Certification

The Lafayette Consolidated Government (LCG) followed U.S. Department of Justice guidance using a four-factor analysis process to determine the number and proportion of LEP individuals in the region and how to cost effectively provide information services to these individuals. The guidance also offers a safe harbor of 5% of the affected population or 1,000 people in the affected neighborhood.

The four-factor analysis process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact with the program, the importance of the program to people's lives, and the resources available to provide translation services.¹⁴

According to the Census, the top two languages spoken at home for ages 5 years and over are French and Spanish in the Lafayette, LA core-based statistical area. Overall, French is spoken by 10.24% of the population, compared with 14.73% of the population in the 2000 Census, while Spanish is spoken at home by 2.7 %.

The frequency and extent with which LEP individuals come into contact with LCG programs is estimated to be moderate. As an association of cities, towns, parishes, and state agencies that serves as a forum for developing policies and making decisions about regional growth and transportation issues, the LCG encourages public comment on its policies, programs, and funding cycles, and therefore would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals.

¹⁴ This language was taken directly from the U.S. Government's Limited English Proficiency Web site, <http://www.lep.gov/recipbroch.html>.

The LCG remains committed to providing translation services to people who request them and have come up with creative solutions to assist LEP individuals and show the agency's interest in providing translation services.

This statement of policy is acknowledged by the Lafayette City-Parish Government in the letter of transmittal from the Lafayette Consolidated Government (LCG) to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

D.3.0 Limited English Proficiency Plan

The LEP Plan is based on federal guidelines using a four factor test to identify areas in which a language policy should be implemented.

D.3.1 Federal Guidelines

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166, "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to federal agencies and programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities, and sub recipients.

D.3.2 Population Analysis: The Four Factor Test

The Lafayette Consolidated Government (LCG) has developed a Limited English Proficiency Plan (LEP) and Methodology to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to LCG services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

- 1) The number or proportion of LEP persons eligible in the MPO service area or likely to encounter a LCG program, activity, or service;
- 2) The frequency with which LEP individuals come in contact with LCG service;
- 3) The nature and importance of the program, activity or service provided by LCG to the LEP population; and
- 4) The resources available to the LCG and overall costs to provide LEP assistance.

D.3.2.1 Number and Proportion of LEP Persons

In order to determine the number or proportion of LEP persons eligible to be served or likely to encounter a LCG program, activity, or service, the Lafayette Consolidated Government examined the US Census Bureau’s multi-year American Community Survey data for 2009-2013.

Table 5 below shows the number of language speakers over 5 years of age in the Lafayette core-based statistical area. The distribution shows that only French is higher than 5% of the population speaking another language other than French.

Table 5
Rank Order List of the Most Frequent Languages Spoken at Home
in Lafayette Parish, Ages 5 Years and Over

Language	Number of speakers	Percent Total (%)
English only	368,752	84.32
Speak a Language other than English at home	68,555	15.67
French & Related Louisiana Dialects	44,794	10.24
Spanish	12,046	2.7
Vietnamese	2,234	0.5
Arabic	697	0.15
Chinese	758	0.17
German	615	0.14
Total Population 5 Years and Over	437,307	-

Source: Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Core-Based Statistical Areas: 2009-2013. <https://www.census.gov/data/tables/2013/demo/2009-2013-lang-tables.html>

D.3.2.2 Frequency of Contact with LEP individuals

The frequency and extent with which LEP individuals come into contact with LCG programs is estimated to be moderate.

D.3.2.3 Nature and Importance of the Program

While essential to the long-term livability and economic vitality of the region, long-range transportation and growth management planning may not be as important of a service to LEP individuals as health care, employment or financial assistance. However, any opportunity to increase public comment on long-range decision-making is a worthwhile investment.

D.3.2.4 Resources and Overall Costs

The Lafayette Consolidated Government (LCG) may hire an otherwise qualified planner who may also speak a foreign language, especially French.

D.4.0 Safe Harbor Stipulation

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A “safe harbor” means that as long as a recipient (the LCG) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four factor analysis.

Evidence of compliance with the recipient’s written translation obligations under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons (whichever is less) of eligible persons served or likely to be affected. Translation can also be provided orally. This is particularly important for Louisiana French, which is mostly an unwritten language with most speakers being unable to read French.

The “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

D.5.0 Limited English Proficiency (LEP) Policy and Plan

The Lafayette Consolidated Government (LCG) has established the following policy for providing information to individuals with Limited English Proficiency (LEP):

Lafayette Consolidated Government (LCG) will obtain French, Spanish, and Vietnamese translators from within our community. Translations may be provided by the staff of the Lafayette Consolidated Government (LCG), Acadiana MPO, the University of Louisiana at Lafayette, the Diocese of Lafayette which has Spanish and Vietnamese translators, and Court Reporters possessing the needed language competencies. Translations may also be volunteers from a language community or may be a paid professional.

The Lafayette Consolidated Government (LCG) will first provide oral translations of English documents into the following languages (based upon the above statistical analysis): Vietnamese, Spanish and French.

The LCG, in order to provide a safe harbor, will also provide written translations of English documents to the persons who have previously requested oral translation in the following language (spoken by more than 5% of the population): French and its Louisiana dialects.

Notice of this service will be placed on the LCG website. Written procedures will be developed as needed to ensure consistent service delivery.

D.6.0 Identification of a LEP Person

Listed below are tools to help identify persons who may need language assistance:

- 1) Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- 2) When LCG sponsored workshops or conferences are held, a staff member greets and briefly speaks to each attendee at the sign-in sheet table. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.

D.7.0 Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. If LCG staff cannot provide verbal interpretation and if a formal interpretation is required, staff shall use the institutions listed in Section D.5.0 Limited English Proficiency (LEP) Policy and Plan or from a language community.

D.8.0 Staff Training

From November 14-16, 2015, three staff members of the Lafayette Consolidated Government (LCG), including the Title VI Coordinator attended the Louisiana Public Transit Association annual conference in Lake Charles where they attended sessions on Title VI training, among other topics. LCG planners regularly attend and participate in conferences and sessions held by professional associations on topics ranging from safety, Smart Growth, GIS, Title VI, etc.

All LCG staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new employees. Training questions are listed below:

- 1) What are Title VI LEP responsibilities?
- 2) What language assistance services are offered by the MPO?
- 3) How to access an interpreter?
- 4) What documentation of language assistance are required?
- 5) How does the MPO handle a LEP complaint?
- 6) How does the LCG providing Notice of Available Language Service to LEP Persons?
- 7) Where are signs posted indicating that language assistance is available?

D.9.0 Outreach Techniques

If staff know that they will be presenting a topic that could be of potential importance to a LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP

persons, the Lafayette Consolidated Government (LCG) will have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish and French. 1⁵

When running a general public meeting notice, staff should insert the Spanish clause:

Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la (337)-291-8410 al teléfono (337) 291-8410, cuando menos 72 horas antes de la junta.”

Similarly, when running a general public meeting notice, the staff should insert the French clause:

Si c'est nécessaire d'avoir quelqu'un qui parle le Français, téléphonez si vous plait à ((337)-291-8410) à téléphone ((337) 291-8410) plus que 72 heures avant le meeting.

The phrase translates generally that if it is necessary for Spanish or French language assistance, then the person should call and schedule arrangements with the LCG more than 72 hours before the meeting.

¹⁵ The current ADA and Title VI Coordinator's name will be listed as X's and the phone number as Y's in the statements in Spanish and French below. The contact information of the current ADA and Title VI Coordinator is listed in Appendix J.

D.10.0 Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, LCG will follow the Title VI Program update schedule for the LEP Plan. Each update examines the plan, and seeks to answer the following questions:

- 1) How many LEP persons were encountered?
- 2) Were their needs met?
- 3) What is the current LEP population in the parishes comprising the urbanized area?
- 4) Has there been a change in the types of languages where translation services are needed?
- 5) Is there still a need for continued language assistance for previously identified LCG services?
- 6) Are there other programs that should be included?
- 7) Have the LCG's available resources, such as technology, staff, and financial costs changed?
- 8) Has the LCG fulfilled the goals of the LEP Plan?
- 9) Were any complaints received (and forwarded/referred to DOTD)?

D.11. Dissemination of the LCG Limited English Proficiency Plan

LCG will post the LEP Plan on its website at <http://lafayettela.gov/>.

Any person, including social service, non-profit, law enforcement agencies and other community members with internet access will be able to access the plan. For those without personal internet service, parish libraries offer free internet access. Copies of the LEP Plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the LCG's Title VI Coordinator using the contact information in Appendix J.

APPENDIX E -- ADA NOTICES

NOTICE OF NONDISCRIMINATION ON THE BASIS OF DISABILITY (AMERICANS WITH DISABILITIES ACT OF 1990)

E.1.0 Certification

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the Lafayette Consolidated Government (LCG) will not discriminate in the LCG's services, programs, or activities against qualified individuals with disabilities on the basis of disability.

E.2.0 Modifications to Policies & Procedures

The Lafayette Consolidated Government will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend the LCG public meetings. For example, individuals with service animals are welcomed in LCG public meetings, even where animals are generally prohibited.

E.2.1 Effective Communication

The LCG will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the LCG's public meetings.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a LCG public meeting should contact the LCG's ADA Coordinator as soon as possible but no later than 72 hours before a scheduled meeting.

The LCG is not obligated by ADA to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. The Lafayette Consolidated Government (LCG) will strive to provide its services, programs and activities in the most accessible manner that is feasible.

Notification that a LCG meeting is not accessible to persons with disabilities should be directed to the current Title VI & ADA Coordinator listed in Appendix J.

E.2.2 ADA Notice to Be Posted At the Bottom of LCG Meeting Notices

For special accommodations for this meeting, contact our ADA Coordinator, ((337)291-8410), via phone (337-291-8410 ¹⁶at least 72 hours in advance of the meeting.

¹⁶ The current ADA and Title VI Coordinator's name will be listed as X's and the phone number as Y's. The contact information of the current ADA and Title VI Coordinator is listed in Appendix J.

APPENDIX F - DBE POLICY PARTICIPATION BY DISADVANTAGED BUSINESS ENTERPRISES IN LAFAYETTE CONSOLIDATED GOVERNMENT (LCG) PROGRAMS

It is the policy of the Lafayette Consolidated Government's (LCG) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of LCG contracts in a nondiscriminatory environment. The objectives of the LCG's Disadvantaged Business Enterprise (DBE) Program are to ensure non-discrimination in the award and administration of contracts, ensure firms fully meet eligibility standards, help remove barriers to participation, create a level playing field, assist in development of a firm so it can compete successfully outside of the program, provide flexibility, and ensure narrow tailoring of the program.

LCG, its staff, and its consultants and sub-consultants shall take necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of the Lafayette Consolidated Government (LCG) in a non-discriminatory environment.

LCG requires that its consultants not discriminate on the basis of race, color, national origin, income, gender, age, and disability in the award and performance of its contracts.

This statement of policy is acknowledged by the Lafayette City-Parish Council in the letter of transmittal from Lafayette Consolidated Government to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

F.1.0 DBE Clause to Be Included Within the Body of Future Contracts Issued by LCG

Participation By Disadvantaged Business Enterprises In Lafayette Consolidated Government (LCG) Programs - It is the policy of the Lafayette Consolidated Government (LCG) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of LCG contracts in a nondiscriminatory environment.

The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, income, gender, age, and disability in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of USDOT/FTA assisted contracts.

Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as LCG deems appropriate.

APPENDIX H -- DISCRIMINATION COMPLAINT PROCESS, COMPLAINT FORM AND COMPLAINT PROCEDURE

All written or verbal complaints of discrimination will be forwarded immediately to the Compliance Programs Office of DOTD for handling in accordance with 23 CFR 200.9 (b)(3). In cases where the Complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint complaints however must be signed by the complainant.

All Title VI and related statute complaints are considered formal as there is no informal process. Therefore, the complainant will be contacted according to DOTD's formal complaint process. Complaints filed under Title VI against sub-recipients or contractors/consultants will be investigated by LCG with the assistance of DOTD's Title VI Program Manager. The LCG shall maintain a confidential log of complaints for the purpose of assisting DOTD.

H.1.0 Complaint Log

The log will include the following information:

- a) Name of Complainant;
- b) Name of Respondent;
- c) Basis of Complaint: race, color, national origin, income, gender, age, and disability or retaliation;
- d) Date complaint received by the LCG;
- e) Date the LCG forwarded the complaint to DOTD's Title VI Program Manager;
- f) A statement of the complaint, including specific details, relevant facts and documentation; and
- g) The final disposition of the complaint.

H.2.0 Intimidation and Retaliation

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.

H.3.0 Time Frames

There are different time frames depending on the agency and complainant.

LADOTD shall respond to complaints according to the time frame delineated below:

1. 45 days to conduct an investigation;
2. 15 days to complete investigative report and submit to the administrative supervisor of DOTD Complaint Section with copies to FHWA, FTA and LCG.

The total time allotted is 60 days.

H.3.1 Complainant

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Lafayette Consolidated Government may file a Title VI Complaint by completing and LCG Title VI Complaint Form. The LCG investigates complaints received no more than 180 days after the incident was alleged to occur, and will process all complaints that are complete.

Once the LCG is in receipt of the complaint, the LCG will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Lafayette Consolidated Government has 45 days to investigate the complaint. If more information is needed to resolve the case, the LCG may contact the complainant. The complainant has 180 business days from the date of the letter to send requested information to the investigator or Title VI Coordinator processing the case. If the investigator or Coordinator is not contacted by the complainant or does not receive the supplementary information requested with the allotted number of business days, the LCG can administratively close the case. A case can also be administratively closed in the event that a complainant expresses a wish to no longer pursue the case.

Upon review of the complaint, the investigator will issue one of two letters to the complainant: a closure letter or a letter of fining (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 synopsisizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff members, or other corrective action will be required. If the complainant wishes to appeal the decision, they have 30 days after the date of the letter to do so.

A complaint must be filed 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 or the latest instance of the conduct.

H.4.0 Contact Information for DOTD Title VI and ADA Compliance

The current contact is Heather Huval. Phone: 225-379-1923. Email: heatherhuval@la.gov

H.5. Title VI Discrimination Complain Form (on the next page)

Lafayette Consolidated Government (LCG)¹⁷

Your Name	Phone	Name of Person(s) who discriminated Against You
Your Address (Street No., P.O. Box, Etc.)		Location and Position of Person (if known)
Your City, State, Zip		City, State, Zip of Alleged Incident
Discrimination occurred because of: <input type="checkbox"/> Race/Color <input type="checkbox"/> Sex <input type="checkbox"/> Disability <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Income Status <input type="checkbox"/> Retaliation		Date of Alleged Incident
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved and witnessed the discrimination. Be sure to include how other persons were treated differently than you. Attach any written material pertaining to your case.		
Section II.		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered yes to this question, skip to Section III.		
If not, please supply the name and relationship of the person for whom you are filing this complaint:		

Title VI Discrimination Complaint Form

¹⁷ This form will be printed and distributed to reflect the name and contact information of the current Title VI & ADA Coordinator as

Please explain why you are filing for a third party:

Please confirm that you have obtained the permission of the aggrieved party to file a complaint on their behalf:	Yes	No
--	-----	----

Section III

Have you previously filed a complaint with this Agency?

Have you filed this complaint with any other Federal, State, or local agency? If yes, please name said agency and briefly describe the incident.

Signature:	Date:
------------	-------

Please return this form to: Shaun P. Williams Title VI & ADA Coordinator Lafayette Consolidated Government 101 Jefferson Street Lafayette, LA 70501	Phone: 337-291-8410
--	---------------------

Accessible Format	Large Print		Audio Tape	
Requirements for this Form?	IDD		Other	

Apendice H- DISCRIMINACION QUEJA PROCESO Y FORMA DE DISCRIMINACION PROCESO

Todas las quejas verbales o en papel de quejas de discriminación van directamente al la oficina del programa de cumplimiento para encargarse el procedimiento de 23 CFR 2009 (b) (3.) En dado caso que la queja no esta disponible de entregar una queja en papel, la persona de la queja tiene que asistir la queja que tenga en forma de declaración escrita y teine que etar firmada de la persona de la queja.

Todos los titulos 6 estan en reláciando de quejas estan considerados formalmenté y no ay un proceso informal. En ese caso la persona de la queja va estar contactado por la compania de DOTD's formalmentéen en el proceso quejas que son bajo titulo 6 en contra de contratadores o consultores van estar bajo investigasion la LCG con la assistancia de DOTD's titulo 6 gente de programa. La LCG va a mantener totalmenté discreción de las quejas el propósito de ayudar asistir a DOTD.

H.1.0 Registro De Quejas

El registro contiene la información abajo.

- A. Nombre de la persona en queja
- B. Nombre de demando/ demandada
- C. Bases de la queja: Raza/color/orgen nacional/ingresos/edad/descapidad/represalias/sexo
- D. Fecha de la queja recibido por LCG
- E. Fecha de LCG adelante de la queja para DOTD's titulo le gerente del programa
- F. Declaración de queja, incluso detalles espesificimante; documentación pertineté
- G. El final queja disposición.

H.2.0 Intimidación y Represalias

Caulquier persona que esta asiendo una queja o iso alguna vez una queja no va estar comprometido a ningun sometida/sometido de ninguna forma de intimidación o represarias. Personas que pienseno sientan que an sometida/sometido de una forma de intimidación pueden aser una queja. Lo mismo de un un procedimiento de quejas de discriminación.

H.3.0 Marcos de Tiempo

Estos son diferentes marcos de tiempos dependiendo de la compania de quejas.

LA DOTD responde de las quejas dependiendo del marco de tiempo delineado abajo:

1. 45 dias para conducta en la investigación.
2. 15 dias para terminar el reporte de queja y enviar al gerenté de administración de DOTD
3. quejas sección con copias al FHWA, FTA y al LCG.
4. El total de asta 60 dias.

H.3.1 Quejas

Cualquier persona que siente que han sido discriminados en forma de raza, color, origen nacional de Lafayette Gobierno poner una forma de título 6 de quejas conselgado y LCG título 6 forma de quejas. El LCG investiga las quejas que son recibidas no mas de 100 dias despues del incidenté que ocurre y va a ser procedido en el proceso de las quejas cumplidas.

Cuando LCG recibe la queja, LCG va a determinar si nuestra oficina tiene jurisdicción. La persona de la queja va a recibir una letra de reconocimiento informanda a el/ella si la oficina de quejas va a investigar la queja de la persona.

Lafayette Consulado de Gobierno tiene 45 dias para investigar una queja de demanda. Si necesitan mas información para resolver el caso el LCG va a contactar a la persona que esta poniendo la queja. La persona de la queja tiene asta 180 dias de trabajo para mandar cualquier informacion que necesitan los investigadores del título 6 coordinador para el caso de investigación. Si el coordinador o investigador/ investigadora no es contactado por la persona de la queja con el numero de dias de trabajo el LCG puede cerrar el caso. El caso tambien puede ser administrativamente cerrado el caso si ya no siguen con la demanda de de queja.

Dependiendo en el caso de queja el investigados va a mandar una letra de dos letras para la persona de la queja: una letra de cierre de fin. Una letra de fin significa que las quejas no estan en violación y el caso va a estar cerrado. La otra letra significa que alegaciones del incidenté y explica si va a estar acción disciplinaria, adicional entrenar a los trabajadores o correctiva acción requerida. Si la persona quiere apelación, la decisión tiene 30 dias despues de la fecha de la letra para hacerlo.

Una queja tiene que estar archivado no mas de 180 dias despues de lo siguiente:

1. La fecha del incidenté de discriminación o;
2. La fecha del incidenté donde la persona ya sabia acto de discriminación, o;
3. End donde fue el incidenté, la fecha cuando ya no mas fue Discriminado ó un tal fecha cerca de Cuando fue la conducta

H.4.0 Información de Conducta Para DOTD Título VI y ADA Complice

El contacto corriente es Heather Huval. Telefono: 225-379-1923. Correo Electronico: heather.huval@la.gov

H.5. Título VI IA Forma De Queja de Discriminación (esta en la proxima pajina)

Lafayette Consolidated Government (LCG)¹⁷

Formulario de Queja de Discriminación del Título VI

Nombre:	Telephono:	Nombre de la Persona discriminado contra ti
Nombre de la Persona discriminado contra ti	Posición y Ubicación de la Person	
Your City, State, Zip	Cíudad y estado del incidenté (es conocida)	
Discriminación occuro porque: —Razo/Color —Sexo —Descapcidad —Anos —Origen Naci6nal —Ingresos —Represalias	Fecha del incidenté	
<p>Esplique los mas posibl6 lo que paso y claro y como fue discriminado contrai. Indicar quien estaba o testigo de la discriminaci6n. Esplique bien las cosas como otras personas fueron tratadas diferent6 de usted. Adjunto caulquier prueba que tenga, pertenecient6 a su caso.</p>		
Secci6n II.		
Siente esta queja en su propio nombre?	Si*	No
Si su repuesta era si para la pregunta, pase a la Secci6n III.		
Si la repuesta era no, por favor ponga el nombre y relaci6n de la persona de quien usted esta obra de queja:		

¹⁷ Este formulario se imprimirá y distribuirá para reflejar el nombre y la informaci6n de contacto del Coordinador actual de Título VI y ADA como se detalla en el Ap6ndice J de este plan.

Por Favor explique porque esta poniendo una presentación tercera?

Por favor confirmé que usted a obtenido el permiso de la queja de la persona de su parte:	Si	No		
Sección III				
A usted alguna vez puesto una queja con esta compania anteriormente?				
A usted puesto una queja antes en este estado o estado federal o agenciá local? So la respuesta es si, por favor idicar el nombre y describir la situacion del incidenté.				
Firma:	Fecha:			
Por favor regresé esta forma a: Shaun P. Williams Title VI & ADA Coordinator Lafayette Consolidated Government Division 1100 PO Box 4017-C Lafayette, LA 70502	Telephono: 337-291-8410			
Formato accesible Requisitos para este formulario?	Letra Grande		Audio Cinta	
	TDD		Otro	

H.6.0 Title VI Complaint Process

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by LCG or our transit service provider may file a Title VI complaint by completing and submitting the LCG's Title VI Complaint Form or by calling LCG's Title VI/ADA Coordinator. The anti-discrimination protection also extends to the activities and programs of LCG's sub-recipients. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). All complaints are logged and will be investigated according to federal standards.

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes, LCG must ensure that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged non-compliance with Title VI and related statutes with Lafayette Transit System.

To submit a complaint online, fill out the online compliant form. LCG's Title VI Complaint Form (English and Spanish) is located on the website:

www.ridelts.com

To submit a claim by mail, by phone or in person, please fill out the printable complaint form:

Lafayette Consolidated Government
101 Jefferson Street
Lafayette, LA 70501
Email: swilliams2@lafayettela.gov
Phone: (337) 291-8410
Fax: (337)291-8415

Individuals may also file complaints directly with the Federal Transit Administration (FTA) with the 180-day timeframe:

Federal Transit Administration (FTA)
Attention: Title VI Coordinator
East Building, 5th Floor – TCR 1200
New Jersey Avenue, SE
Washington, DC 20590

Complaints received by Lafayette Transit System will be assigned to the Title VI/ADA Coordinator for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, the Title VI/ADA Coordinator will respond to the complainant and, if warranted by the investigation, take appropriate action. LCG, as the designated recipient of federal funds is responsible for monitoring this process.

Note: To request information about LCG Title VI Policy, please send an e-mail to swilliams2@lafayettela.gov. To request information in alternative formats, please contact swilliams2@lafayettela.gov or phone: 337-291-8410.

LCG has 30 days to investigate each complaint. If more information is needed to resolve the case, LCG may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what the corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to LCG.

TRACKING

Complaint comes in and is logged and filed by the Title VI/ADA Coordinator.

Once complaint is received, the Title VI/ADA Coordinator will notify and send complaint to the Transit and Parking Manager within 24 hours. During the review process, the Title VI/ADA Coordinator will send out emails to Parking and Transit Manager and CAO to remind them that the complaint is not yet resolved or closed out. This process is reinitiated weekly to ensure timely compliance.

INVESTIGATING

1. Summary of the complaint, completed by the Title VI/ADA Coordinator.
2. Statement of issues. List every issue derived from the complaint summary. Include questions raised by each issue:
 1. Who?
 2. What?
 3. When?
 4. Where?
 5. How?

Add new issue that surface during investigation. The final list of issues becomes outline for investigation.

3. Respondent's replay to each issue. Obtain information from each respondent, listen to each tape, review each document. All staff will document information collected in the customer contact (respondent area). After all respondent information is documented, complete the documentation (remaining step). Determine the action taken. Follow up with the customer.

Note: "Respondent" is not confined to the transit vehicle operator. "Respondent" is defined as any source of information that can contribute to the investigation, such as:

- Operator (interview/History)
- Radio/Dispatch
- GPS tracking software and programs
- Maintenance (Staff/Records)
- City Transit Staff
- Witnesses
- Complainant (Interview/History)
- Video (camera) and/or audio recordings

Incident reports (supervisor, transit police, fare/security inspectors)
Other transit employees
Route history

4. Findings of fact. Investigate every "issue" (stated in the "statement of issues noted in step two). Separate facts from opinions.
5. Citations of pertinent regulations and rules. Develop list of all regulations, rules, policies, and procedures that apply to the investigation.

Title VI requirements

LCG's policies and service standards

6. Conclusions of law. Compare each fact from "findings of fact" to the list of regulations, rules, etc. Make decision on whether violation(s) occurred. List of violations become "conclusions of law".
7. Description of remedy for each violation. Specific corrective actions for each violation found. Include plans for follow-up checks. Don not conclude report with "no action taken". If no violations found, conclude the report in a positive manner. Review policies and procedures. Review Title VI provisions.

RESPONSE TO COMPLAINANT

Detailed summary of conversation with the complainant. Send copy of letter to complainant.

ACTION TAKEN

Must include specific corrective action for each violation found.

Include a follow-up action plan.

If no violations found, note polices procedures, etc. reviewed with operator.

H.6.1 Title VI Complaint Procedure

This section outlines LCG's Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with LCG, Federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from, be denied the benefits of or be subject to discrimination under any program or activity receiving federal financial assistance.

1. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, ancestry, handicap and familial status as noted below may file a written complaint with the LCG's Title VI/ADA Coordinator, 101 Jefferson St. Lafayette, LA, 70501. Complainants have the right to complain directly to the appropriate federal agency. Federal and State law requires complaints be filed within 180 calendar days of the alleged incident.

Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI/ADA Coordinator may be utilized for resolutions. The Title VI/ADA Coordinator will notify LCG's Chief Administrative Officer of all Title VI complaints as well as all resolutions.

2. Complaints must meet the following requirements:
 - a. The complaint must be filed within 180 days of the alleged occurrence. The allegation must involve a covered basis such as race, color, or nation origin. The allegation must involve Lafayette Transit System (LTS).
 - b. The complaint shall be in writing, signed and dated by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Executive Director or designee will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - c. The written complaint shall include the following information:
 1. Name, address, and telephone number of the complainant.
 2. The basis of the complaint (ie: race, color or nation origin).
 3. The date or dates on which the alleged discriminatory event or events occurred.
 4. The nature of the incident that led the complainant to feel discrimination was a factor.
 5. Names, addresses, and telephone numbers of persons who may have knowledge of the event, including names and job titles of those individuals received as parties in the complaint.
 6. Other agencies or courts where complaint may have been filed and a contact name.
3. Upon receipt of the complaint, the Title VI/ADA Coordinator will determine its jurisdiction, acceptability, need for additional information, and determine if the complaint merits an investigation.
4. The complaint will then be logged in a database identifying the following: Complainant's name, basis, alleged harm, race, color and national origin of the Complainant.

5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
6. In cases where the Title VI/ADA Coordinator accepts the complaint, the Title VI/ADA Coordinator shall complete an investigation within 45 days. The Human Rights Executive Director or designee will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The investigative report and its finding will be reviewed by the Lafayette Transit System Director and the CAO of LCG
8. Notice of the determinations will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notices of appeals are as follows:
 - a. LCG will reconsider this determination, if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and /or resolution set forth by LCG, the same complaint may be submitted to the Federal Transit Administration for investigation. Complainant will be advised to contact Federal Transit Administration, Office of Civil Rights, East Building 5th Floor TCR 1200 New Jersey Ave., SE, Washington, D.C., 20590. Phone: (202)366-4018..
9. A copy of the complaint and LCG's investigation report/letter of findings and the Final Remedial Action Plan, if appropriate will be issued to the Federal Transit Administration within 120 days of the receipt of the complaint.
10. A summary of the complaint and its resolution will be included as part of the Title VI updates to the Federal Transit Administration.
11. Human Rights Executive Director will ensure that all records relating to LCG's Title VI Complaint Process are maintained with departmental records. Records will be available for compliance review audits.

APPENDIX I - TITLE VI TRAINING OPPORTUNITIES

I.1.1 One-Day Course

National Title VI Forum developed by the Federal Highway Administration

http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/flyer_exp_081909.pdf

I.1.2 Two-Day Course

Civil Rights Training Symposium developed by Southern Transportation Civil Rights Executive Council

http://www.brgfl.com/BRG/Home/Entries/2009/4/20_2009_Southern_Transportation

I.1.3 Two-Day Course

Transit Equity Considerations developed by National Transit Institute

<http://www.ntionline.com/CourseInfo.aspCourseNumber=TCR07>

I.1.4 Two-Day Course

Fundamentals of Environmental Justice developed by FHWA and FTA -sponsored by National Highway Institute

http://www.nhi.fhwa.dot.gov/training/train_catalog.aspx

I.1.5 Two-Day Course

Title VI Training developed by LA Department of Transportation and Development

Contact: See the Title VI Programs Manager at DOTD as listed in Appendix H.

I.1.6 Online Training Materials

US Department of Justice Civil Rights Division

<http://www.usdoj.gov/crt/cor/coord/train.php>

FHWA Resource Center for Training

<http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/index.cfm>

I.2.0 Training Completed

In November 2016, Lafayette Consolidated Government (LCG) staff members attended

Department of Transportation and Development (DOTD) sponsored Louisiana Public Transit Conference informational meeting on Title VI of the Civil Rights Act of 1964 for all of the planning commissions and their staffs.

Shaun Williams, LCG Title VI Coordinator, attended a Title VI workshop in Washington D.C. in September of 2014 sponsored by the Federal Transit Administration titled "Title VI and Public Transit". This training was hosted by the National Transit Institute.

Shaun Williams, LCG's Title VI Coordinator as of this writing, attended the Louisiana Public Transportation Conference in Lake Charles from November 14-16, 2016, including workshops on Title VI.

Shaun Williams, participated in an ADA seminar sponsored by the Association of Pedestrian and Bicycle Professionals titled, "Designing Pedestrians Facilities for Accessibility". This training was hosted by Louisiana Department of Transportation and Development in 2014.

Shaun Williams, LCG's Title VI Coordinator, participated in a Title VI Webinar sponsored by the Federal Transit Administration titled "Proposed Revisions Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients" in 2011.

In the 2008, 2009, 2010 and 2011, the Louisiana Chapter of the American Planning association held mandatory meetings for members of the planning staff and for members of planning commissions. The meeting agendas covered ethical principles involved in the planning process. Among the material covered were three requirements from the Statement of Principles:

1. Strive to increase the opportunities for women and members of recognized minorities to become professional planners.
2. Respect the rights of all persons and do not discriminate against or harass others based on characteristics that are protected under civil rights laws and regulations.
3. Recognize the rights of citizens to participate in planning decisions.

APPENDIX J - CURRENT STAFF AND ORGANIZATION

The staff and organization of the Lafayette Consolidated Government (LCG) may change from time to time as need arises and personnel changes occur in order to respond to the needs of the service area population. In addition, DOTD may change the contact information for the Compliance Programs Section as shown in Section J-3-0.

The contact information for DOTD Compliance staff is listed in Section J-3 below.

J-1.0 Title VI & ADA Coordinator

Shaun Williams
 Title VI & ADA Coordinator, Division 1211
 Lafayette Consolidated Government
 PO Box 4017-C
 Lafayette, LA 70501
 Ph: 337-291-8410
 Fx: 337-291-8415
 Email: swilliams2@lafayettela.gov

J-2.0 Supervision, Position, Race, and Gender of Staff

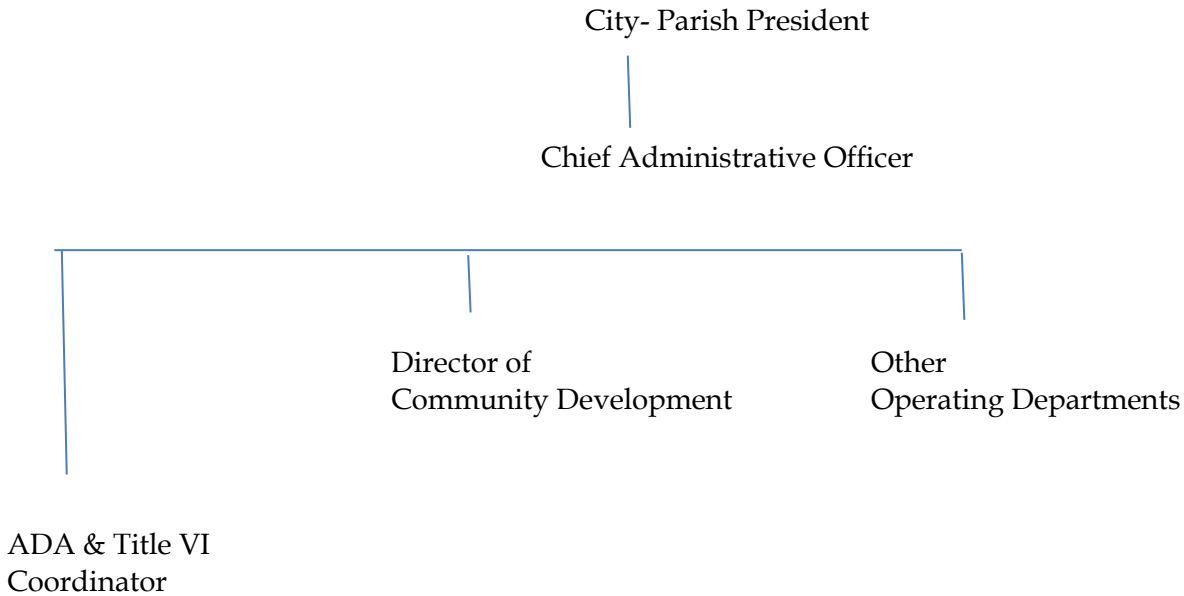
Shaun Williams is the Title VI/ADA Coordinator. His responsibilities include Title VI, ADA and Disadvantaged Business Enterprise (DBE) Coordinator. He reports directly to Shanea Nelson, the Director of Community Development (CD), who is in charge of a multifaceted organization providing direct services in the form of Neighborhood Pride Program, Senior Centers, Drug Treatment and Counseling, Housing Rehabilitation, Probation and other services. Shaun Williams also reports to Lowell Duhon, the Chief Administrative Officer (CAO). Mr. Duhon administers the relationship between the operating divisions of LCG and the City-Parish President, Joel Robideaux.

Table J-2				
Lafayette Consolidated Government				
Full Name	Position	Race	Gender	National
Shaun Williams	Title VI/ADA Coordinator	Black	Male	Afro-Am
Lowell Duhon	Chief Administrative Officer	White	Male	Anglo-Am
Shanea Nelson	Director of Community Development	White	Female	Afro-Am
Joel Robideaux.	City-Parish President	White	Male	Anglo-Am
Warren Abadie	Parish Engineer	White	Male	Anglo-Am
Mike Mitchell	Transit Manager	Black	Male	Afro-Am
Terry Hurd	Transit Planner	White	Male	Anglo-Am
Danielle Breaux	PZD Director	White	Female	Anglo-Am
Cathie Gilbert	Planning Manager	White	Female	Anglo-Am
Kirk Trahan	Planner II	White	Male	Anglo-Am

Organization Chart

J-2

Positions in Lafayette Consolidated Government
Related to ADA & Title VI Coordinator



J-3-0 DOTD Compliance Staff

Heather Huval
Title VI/ADA Program Manager
LA DOTD - Compliance Programs Section Title VI Unit - Room 305J
P.O. Box 94245
Baton Rouge, LA 70804-9245
Phone: 225-379-1923

Email: heather.huval@la.gov

Appendix K

List of Transit-related Title VI Investigations, Complaints, and Lawsuits

	Date	Summary	Status	Actions Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

The Title VI Coordinator is responsible for receiving, reviewing, and processing all Title VI complaints in a professional and timely manner according to the Procedures delineated in the antecedent sections. To date, Lafayette Consolidated Government (LCG) has no Title VI complaints on record at this time. Consequently, Appendix K includes a sample form for future use to document any received Title VI Complaints.

Appendix M - Demographic Profile and Data Tables for Lafayette Parish

The LCG Title VI Plan utilizes various data sources to support Title VI in the following:

- Compile key demographic data on minority and low-income populations in Lafayette Parish, as well as other populations of interest, for environmental justice consideration in conducting regional transportation, economic development, growth management planning, program activities and public outreach.
- Identify the locations of communities within the region with significant minority and low-income populations in order to facilitate and enhance environmental justice analyses, outreach, and other planning activities.

Appendix M contains tabulated demographic profile for Lafayette Parish. These statistics indicate that certain populations within Lafayette Parish and the unincorporated areas should be monitored for Title VI equity.

A Note on Data Sources

All data are sourced from the American Community Survey's 5-year estimates of the Census Bureau, which publishes the data with the following caveat:

"Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

"Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

"Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties."

Table 9
Race
Lafayette Parish

	Estimate	Percent
Total Population	224,719	(X)
One Race	220,275	98%
Two or more races	4,444	2%
White	157,557	70.1%
Black	57,251	25.5%
American Indian	634	0.3%
Asian	3,267	1.5%
Native Hawaiian and Other Pacific	70	0.0%

Source: 2009-2013 American Community Survey, 5-Year Estimate Source Table: DP05

Table 10
Commuting to work
Mode split
Lafayette Parish

	Estimate	Percent
Workers 16 and over	110,016	
Car, truck, or van - drove alone	91,558	83.3%
Car, truck, or van - carpooled	11,184	10.2%
Public Transportation (excluding taxis)	796	0.7%
Walked	1,835	1.7%
Other	1,997	1.8%
Worked at home	2,646	2.4%

Source: 2009-2013 American Community Survey, 5-Year Estimate. Source Table: DP03

**Poverty Status in the Past 12 Months
Lafayette Parish**

	Total	Below Poverty Level: Estimate	Percent Below Poverty
Poverty Population Determined	219,808	36,600	16.7%
Under 18 Years of Age	54,028	11,124	20.6%
18-64 years	143,131	22,600	15.8%
65 and over	22,649	2,876	12.7%

Source: 2009-2013 American Community Survey, 5-Year Estimate. Source Table: S1701

**Table 12
Disability Status of the Civilian Population
Lafayette Parish**

	Estimate	Percent
Total Civilian Non- institutionalized Population	222,220	(X)
Total Civilian Non- institutionalized Population with Disability	25,383	11.4%
Total Population Under 18 Years	54,468	(X)
Total Population Under 18 Years With a Disability	2,400	4.4%
Total Population 18- 64 Years	145,103	(X)
Total Population 18- 64 Years With a Disability	14,357	9.9%
65 Years and Over	22,649	(X)
65 Years and Over with a Disability	8,626	38.1%

Source: 2009-2013 American Community Survey, 5-Year Estimate. Source Table: DP02
For a definition of the Disability as it is used by the U.S. Census, please refer to the follow page:
<http://www.census.gov/people/disability/>

**Tenure by Vehicle
Lafayette Parish**

	Estimate
Total:	88,611
Owner occupied:	55,562
No vehicle available:	1,526
Householder 15 to 34 years	0
Householder 35 to 64 years	737
Householder 65 years and over	789
1 or more vehicles available:	54,036
Householder 15 to 34 years	9,584
Householder 35 to 64 years	31,629
Householder 65 years and over	12,823
Renter occupied:	33,049
No vehicle available:	4,314
Householder 15 to 34 years	1,141
Householder 35 to 64 years	1,953
Householder 65 years and over	1,220
1 or more vehicles available:	28,735
Householder 15 to 34 years	14,006
Householder 35 to 64 years	12,639
Householder 65 years and over	2,090

Source: 2014 American Community Survey, 1-Year Estimate. Source Table: B25045

Appendix N - Maps of the City of Lafayette and the Unincorporated Areas of the Parish

The following map series illustrates demographic variables pertaining to Title VI: public transit mode split, rates of disability, income, poverty rates, language use, food stamps, age and race. These maps were created in ArcGIS from the American Community Survey 5-Year Estimates, 2009-2013. All data are mapped at the block group level with the exception of public transportation use, which is so low in the city of Lafayette and the unincorporated areas of the Parish.

Map 1

Number of Riders by Zip Code of Residence

Map 2

English Only Household Map

Map 3

Hispanic Map

Map 4

Disability Map

Map 5

Food Stamps Map

Map 6

Limited English Spanish Speaking Households

Map 7

Number of Riders by Zip Code of Residence

Map 8

Per Capita Income by Block Group -

Map 9

Households in Poverty by Block Group

Map 10

Black Race by Block Group

Map 11

Median Age by Block Group

