

ST. TAMMANY PARISH COUNCIL

RESOLUTION

RESOLUTION COUNCIL SERIES NO: C-3647

COUNCIL SPONSOR: BINDER/BRISTER

PROVIDED BY: GRANTS

RESOLUTION TO ADOPT THE ST. TAMMANY PARISH TITLE VI PROGRAM IN COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964.

WHEREAS, Title VI of the Civil Rights Act of 1964 ("Act") is intended to provide civil rights protection against discrimination based on the grounds of race, color or national origin; and

WHEREAS, the provisions of the Act include specific compliance requirements for local government agencies that are federal grant recipients for transit programs; and

WHEREAS, St. Tammany Parish is applying for a federal grant and desires to adopt a Title VI Program.

THE PARISH OF ST. TAMMANY HEREBY RESOLVES that the St. Tammany Parish Council adopt the "Title VI Program" as attached to this Resolution as Exhibit "A".

THIS RESOLUTION HAVING BEEN SUBMITTED TO A VOTE, THE VOTE THEREON WAS AS FOLLOWS:

MOVED FOR ADOPTION BY: \_\_\_\_\_ SECONDED BY: \_\_\_\_\_

YEAS: \_\_\_\_\_

NAYS: \_\_\_\_\_

ABSTAIN: \_\_\_\_\_

ABSENT: \_\_\_\_\_

THIS RESOLUTION WAS DECLARED ADOPTED ON THE 7 DAY OF FEBRUARY, 2013, AT A REGULAR MEETING OF THE PARISH COUNCIL, A QUORUM OF THE MEMBERS BEING PRESENT AND VOTING.

\_\_\_\_\_  
JERRY BINDER, COUNCIL CHAIRMAN

ATTEST:

\_\_\_\_\_  
THERESA L. FORD, COUNCIL CLERK

#### ADMINISTRATIVE COMMENT

All Federal Transit Administration grant recipients are required to submit a Title VI Program in compliance with the Civil Rights Act of 1964. This program must be updated every three years. The program must be approved by the governing board of the recipient organization.

# **Exhibit A**

## **Title VI Program**



*Pat Brister*  
*Parish President*

# **Title VI Program**

St. Tammany Parish Government

Grants Department/goSTAT Transit Service

**TABLE OF CONTENTS**

Background Information.....Page 03  
Title VI Program Checklist.....Page 04  
Title VI Notice to the Public.....Page 05  
Title VI Complaint Procedures.....Page 06  
Title VI Complaint Form.....Page 09  
List of Any On-Going Title VI Complaints.....Page 11  
Public Participation Plan.....Page 12  
Limited English Proficiency (LEP) Plan.....Page 17  
Membership of Non-elected Officials.....Page 26  
Sub-recipient Monitoring.....Page 27  
Title VI Equity Analysis for Transit Constructed Facilities.....Page 28  
Council Resolution.....Page 29

**BACKGROUND INFORMATION:**

St. Tammany Parish Government operates a transit system called goSTAT. goSTAT is a demand/response curb to curb service. The Parish receives both 5307 Urban and 5311 Rural funding. The Rural Program began in 2009 while the Urban Program was started in 2010. The Parish issued a "request for proposal" for both services. The winner of this contract would operate on a "turn key" basis. They would provide all vehicles, drivers, maintenance, dispatch, etc. for an hourly rate. The service has been a success. The Parish received an award in both 2010 and 2011 from the Louisiana Department of Transportation and FTA Region VI for the highest percentage of growth in the state of Louisiana for its transit programs.

## TITLE VI PROGRAM CHECKLIST

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

### General Requirements

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted.
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance.
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees.
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity.



**TITLE VI NOTICE TO THE PUBLIC**

**The following notice will be posted on all transit vehicles:**

**Notifying the Public of Rights Under Title VI**

**ST. TAMMANY PARISH GOVERNMENT**

- St. Tammany Parish Government 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 that he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with St. Tammany Parish Grants Department.
- For more information on the Parish's civil rights program as well as the procedures to file a complaint, please call 985-809-2989 or e-mail to [gostat@stpgov.org](mailto:gostat@stpgov.org); or visit the Parish Grants Department located at 21410 Koop Drive, Mandeville, LA 70471.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.
- If information is needed in another language, call 985-809-2989.
- Si necesita información en otro idioma, llamar al 985-809-2989



## TITLE VI COMPLAINT PROCEDURES

St Tammany Parish Transportation is committed to providing reliable, safe, and satisfying transportation options for the community. Input on our Transportation Program is a fundamental aspect of our Community and as such, their feedback is crucial to the growth and development of the agency.

The St. Tammany Parish Transportation Complaint Policy has been established to ensure that riders of the system have an easy and accessible way to provide feedback to the agency. St. Tammany Parish Transportation is open to hearing any customer feedback including complaints, comments, suggestions, or concerns.

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination based on race, color, national origin, sex, age, income, and handicap/disability, be excluded from participation or, be deemed the benefits of, or subject to discrimination under any programs and activities receiving Federal financial assistance.

### Complaints

1. Any person who believes that he/she, individually or as a member of any specific class of persons has been subjected to discrimination by the goSTAT Transportation Program or its activities on the basis of race, color, or national origin may file a complaint.
2. Any person who believes that he/she, individually or as a member of any specific class of person has a complaint or maintenance request regarding any service provided by St. Tammany Parish's transportation program may file a complaint.

### Filing a Complaint

1. Any complaint regarding goSTAT service should be sent in writing to the company providing the service within 180 days of the occurrence. If the complainant feels it inappropriate to contact the company or feels that the company is not adequately addressing the complaint, the St. Tammany Parish Transportation Administration office should be contacted.
2. Any complaints or maintenance requests regarding park and rides should be sent directly to St. Tammany Parish Transportation Administrator.
3. Complaints shall state the name and address of the person and, if applicable, the name of the representative filing on behalf of the complainant, the name and address of the entity alleged to have committed the act of discrimination, and shall set forth the particulars of that action and contain such other information as shall be required by St. Tammany Parish Government/goSTAT Transportation.
4. All complaints will include the following information:
  - Name, address, and phone number of the Complainant

- Name, address, phone number and relationship of Representative to Complainant, (if applicable)
- Basis of complaint (i.e., race, color, national origin, etc)
- Date of alleged discriminatory act(s)
- Date complaint received by St. Tammany Parish Government/goSTAT Transportation
- A statement of the complaint, including specific details, relevant facts and documentation will be filed at the St. Tammany Parish Transportation Administration

The St. Tammany Parish Government/goSTAT Transportation will maintain a Complaint Intake log establishing the race, color, or national origin or protected class of the complainant, the identity of the recipient, the nature of the complaint, the date of the investigation, lawsuit, or complaint, a summary of the allegations, the status of the investigation, lawsuit or complaint, and actions taken in response to the investigation, lawsuit or complaint.

### **Processing of Complaints**

1. Within fifteen (15) working days, the St. Tammany Parish Government/goSTAT Transportation shall confirm receipt of the complaint and inform the Complainant of the investigation process.
2. Within sixty (60) days, should the complaint have merit, the St. Tammany Parish Government/goSTAT shall commence an investigation of the allegation(s). If the complaint is regarding discrimination, an investigation will determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 has occurred. In addition, the St. Tammany Parish Transportation Administrator will render a recommendation for action in a report of findings or resolution.
3. Within ninety (90) days, the St. Tammany Parish Government/goSTAT Transportation Administrator will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. If the Complainant is dissatisfied with the final decision rendered by the Transportation Administrator, he/she may file an appeal within 10 working days with the 2<sup>nd</sup> Deputy CAO/Operations. The 2<sup>nd</sup> Deputy CAO/Operations shall have 30 days to review and render a written decision either to concur or deny the appeal.
4. If the Complainant is dissatisfied with the final decision rendered by the 2<sup>nd</sup> Deputy CAO/Operations, he/she may file an appeal within 10 working days with the St. Tammany Parish CAO office. The CAO Office shall have 30 days to review and render a written decision either to concur or deny the appeal.
5. The St. Tammany Parish Government/goSTAT Transportation will maintain a log of all complaints received.



## Resolution

1. If a probable cause of a discriminatory practice based on race, color, or national origin is found to exist, the St. Tammany Parish Government/goSTAT Transportation shall eliminate said practice by means of a Remedial Action Plan.
2. The Remedial Plan shall include: a list of all corrective actions accepted by the Parish; a description of how the corrective action will be implemented; and a written assurance that the Parish will implement the accepted corrective action in the manner discussed in the plan.
3. Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA C4702.1B.

## Right to Appeal

If passenger/clients believe that he or she has been excluded, treated unfairly or received poor service, they have a Right to Appeal the decisions made by Provider. A complaint may be filed with the goSTAT Transportation Administrator, P.O Box 628, Covington, LA 70434, by telephone 985-809-2989, or by email [gostat@stpgov.org](mailto:gostat@stpgov.org). We encourage you to make your complaint in writing.

The Transportation Administrator will review and investigate every incident/complaint promptly. Reasonable measures will be taken to preserve any information that is confidential. At a minimum, the Transportation Administrator will review all relevant documentation and procedures: interview people with knowledge of the incident/violation, the complainant, or anyone with relevant information.

Upon completion of the investigation the Transportation Administrator will complete a final report for the 2<sup>nd</sup> Deputy CAO/Operations and Chief Administrative Officer. If a violation is found to exist, remedial steps as appropriate and necessary will be taking immediately. The investigation process and final report should take no longer than two weeks.

**TITLE VI COMPLAINT FORM**

St. Tammany Area Transit/goSTAT is committed to ensuring that no person is excluded from participation or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaints. If you require any assistance in completing this form, please contact St. Tammany Parish Grants Department by calling (985) 809-2989. This completed form must be returned to the St. Tammany Parish Grants Department, Transportation Administrator, Post Office Box 628, Covington, LA 70434.

|  |                       |
|--|-----------------------|
| <b>Name:</b>   | <b>Phone:</b>         |
| <b>Street Address:</b>   | <b>Alt Phone:</b>     |
| <b>City, State &amp; Zip Code</b>  | <b>Email Address:</b> |
| <b>Person(s) discriminated against ( if someone other than complainant):</b> |                       |
| <b>Name(s):</b>  |                       |
| <b>Street Address, City, State &amp; Zip:</b>                                |                       |

**Date of Incident:** \_\_\_\_\_  
**Which of the following best describes the reason for the alleged discrimination that took place? (Circle one)**

- Race
- Color
- National Origin (Limited English Proficiency)

**Please describe the alleged discrimination incident. Provide the names and title of all the goSTAT employees involved if available. Explain what happened and whom you believe was responsible.**

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

**Please use back of this form if additional space is required.**

Have you ever filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No

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

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

\_\_\_\_\_  
Complainants Signature

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Printed Name of Complainant

---

**For Office Use Only**

Date Received: \_\_\_\_\_  
Received By: \_\_\_\_\_

**LIST OF ANY ON-GOING TITLE VI COMPLAINTS**

There have been no Title VI complaints against St. Tammany Parish. The chart below will be used to list any Title VI investigations, lawsuits or complaints levied against the Parish in the future if needed.

**List of Investigations, Lawsuits and Complaints**

|                       | Date<br>(Month, Day,<br>Year) | Summary<br>(include basis of<br>complaint: race,<br>color, or national<br>origin) | Status | Action(s) Taken |
|-----------------------|-------------------------------|---|--------|-----------------|
| <b>Investigations</b> |                               |   |        |                 |
| 1.                    |                               |   |        |                 |
| 2.                    |                               |   |        |                 |
| <b>Lawsuits</b>       |                               |   |        |                 |
| 1.                    |                               |   |        |                 |
| 2.                    |                               |   |        |                 |
| <b>Complaints</b>     |                               |   |        |                 |
| 1.                    |                               |   |        |                 |
| 2.                    |                               |   |        |                 |



## **PUBLIC PARTICIPATION PLAN**

### **Purpose**

The purpose of this Public Participation Plan (PPP) is to establish procedures that allow for, encourage, and monitor participation of all citizens in the goSTAT service area, including but not limited to low income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

A notice will be posted in the local newspaper, noting the existence of this public participation plan and a copy of the public participation plan will be sent, at a minimum, to the stakeholders identified in Appendix A.

### **Goals and Objectives for the Public Participation Plan**

Goal: The goal of the PPP is to offer real opportunities for the engagement of all citizens of the goSTAT service area to participate in the transit planning process.

#### Objectives:

- To determine what non-English languages and other cultural barriers exist to public participation within St. Tammany Parish.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public.
- To provide avenues for two way flow of information and input from populations which are not likely to attend meetings.
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.
- To use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the internet.

### **Identification of Stakeholders**

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

**General Citizens:** There are 233,740 residents in St. Tammany Parish (U.S. Census, 2010). Over 94 percent of the population of the parish considers themselves to be solely of a white race.

Over 99 percent of the households have someone over the age of 14 who speaks English, with 94 percent speaking only English in the home.

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspaper, open house format public information meetings. While these techniques will continue, staff will make a greater effort to engage the general public, possibly with techniques such as, nominal group exercises, surveys, use of the local news media, etc.

**Minorities:** Minority populations make up a fairly small percentage of the population of St. Tammany Parish (See Table 1). The largest minority group is Black with 11.4 percent of the total population of the parish. Hispanic persons account for 4.7 percent of the population. There are also a small number of American Indian/Alaska native (0.5 percent). Persons who consider themselves to be of more than one race account for 1.8 percent of the population.

Engaging minority, and low-English proficiency populations can be challenging. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. goSTAT transit staff will make reasonable efforts to engage minority populations using techniques, such as including notations in public notices in appropriate non-English languages that will provide a contact where the individual can be informed of the process/project, and will have the opportunity to give input. Focus groups may also be established for the purpose of gaining input from a particular defined portion of the community. Also, advocacy groups can be a good resource for contacts and dissemination of information to minority and low-English proficiency populations. Such advocacy groups or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts or arenas for input. Contacts with local translators should also be maintained, and used as requested and needed.

**Table 1**  
**St. Tammany Parish Population**  
**(Source: US Census Bureau, 2010)**

| Category                      | Number  | % of<br>Population |
|-------------------------------|---------|--------------------|
| Total                         | 233,740 | 100.00%            |
| Total one race                | 229,493 | 98.2%              |
| White                         | 195,364 | 83.6%              |
| Black                         | 26,645  | 11.4%              |
| Hispanic                      | 10,970  | 4.7%               |
| Two or more races             | 4,247   | 1.8%               |
| Other                         | 3,259   | 1.4%               |
| Asian                         | 2,972   | 1.3%               |
| American Indian/Alaska Native | 1,160   | 0.50%              |
| Hawaiian & Pacific Islander   | 93      | 0.03%              |



**Low-income:** In St. Tammany Parish, 10.3 percent of the population is below the local poverty level, based on 2009 incomes. Low income populations of St. Tammany Parish should be given every reasonable opportunity to provide input in transportation plans and programs, to avoid disproportionate harm, or lack of benefit, of transportation programs and projects.

While low-income individuals may have access to all of the traditional means of public involvement, discussed under “general public,” they may be less likely to become involved, or offer input. Some methods of gaining input either directly or indirectly from this portion of the population include focus groups, informal interviews, and agency/advocacy group contacts.

**Public Agencies:** Public agencies can provide valuable input to the planning process, in addition to assisting in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income, and limited English proficiency households. These agencies have great insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professional dealing more distinctly with the provision of transportation services.

**Private Organizations and Businesses:** Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. For that reason, representation of private business interests will be welcomed in the planning process.

### **Public Participation Plan**

This document, upon its adoption, is to serve as the PPP for goSTAT Transit. Availability of the policy for review will be advertised in a manner reasonably expected to reach the general public, as well as minority populations, low-income persons, and other traditionally under-served populations. This could occur through contacts mentioned earlier in this document, notification of contacts available in English, Spanish, and Hmong languages, in addition to traditional public notices in local newspapers

Public involvement is important at all stages of transit planning. Opportunities for participation for both users and nonusers of goSTAT will be available. Both onboard survey and nonuser survey are scheduled for implementation throughout this process. Public are always accepted. A notice will be posted in the local newspaper.

St. Tammany Area Transit  
PO Box 628  
Covington, LA 70434  
Phone: 985-809-2989  
Fax: 985-276-6410  
Contact: Perry Felarise, Transportation Administrator, [pfelarise@stpgov.org](mailto:pfelarise@stpgov.org)

Other stages of the planning process, such as reviewing draft documents and mapping, are more conducive to other techniques. Documents are available for review at the goSTAT Office,

located at 21410 Koop Drive, Mandeville and on the goSTAT website: [www.stpgov.org/gostat.php](http://www.stpgov.org/gostat.php).

If materials are requested in Spanish, Hmong, large type and/or Braille, staff will make a reasonable attempt to accommodate those needs. Other techniques could also be determined to be useful at any particular stage of the process, and new and different techniques will be utilized as deemed appropriate.

### **Outreach Efforts**

In addition to the outreach efforts identified earlier in this policy, staff will use the following techniques during its planning processes, as deemed appropriate by transit staff:

- Presentations to professional, citizen, and student organizations.
- Articles in community newsletter.
- Press releases and meetings with local media representatives.
- Informal conversations with individuals and small groups.
- Interviews with people who are or could be affected by study recommendations.
- Presentations by experts on various transit-related subjects.
- User and non-user surveys.
- Use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the internet.

Other techniques will be examined to determine the best methods of involving all segments of the service area population in the planning process.

**Availability of Planning Documents:** Hard copies of documents, upon completion, will be available at the goSTAT Office, located at 21410 Koop Drive in Mandeville. Electronic versions of the documents will be available on the goSTAT website: [www.stpgov.org/gostat.php](http://www.stpgov.org/gostat.php).

**Methods of Addressing Comments:** Comments will be documented, presented to decision making bodies, modified in the contents of the document as necessary, and will be included in the appendices of planning products after they are approved and published. Comments received after studies and other planning products are completed and approved will be documented and referenced when amending or updating the planning products in the future.

**Responses to Information Requests and Comments:** Information can be requested from staff in person and by phone, fax, e-mail and US mail.

**Appendix A**

**Public Participation Plan Stakeholders List**

American Red Cross  
Archdiocese of New Orleans Hispanic Apostolate  
Florida Parishes Human Services  
Good Samaritan Ministry  
Lakeview Regional Medical Center  
Louisiana Department of Transportation  
Northlake Crisis Pregnancy Center  
Puetes New Orleans  
Regional Planning Commission, New Orleans  
Samaritan Food Bank  
Slidell Adult Daycare Center  
Southeastern Louisiana University-St. Tammany Center  
St. Tammany Community Health Center  
St. Tammany Parish Department of Health and Hospitals  
St. Tammany Parish School Board  
St. Tammany Parish Hospital  
STARC  
Volunteers of America



## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address St. Tammany Parish Government responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### Plan Summary

St. Tammany Parish Government receives FTA funds to run goSTAT, a demand response transit service. The Parish Government has a turn-key contract with Reliant Transportation to provide this service. St. Tammany Parish Government has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by goSTAT. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, the St. Tammany Parish Grants Department undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a goSTAT program, activity or service.
2. The frequency with which LEP persons come in contact with goSTAT programs, activities or services.
3. The nature and importance of programs, activities or services provided by goSTAT to the LEP population.
4. The resources available to goSTAT and overall cost to provide LEP assistance.

A summary of the results of the St. Tammany Parish four factor analysis is in the following section.



**Four-Factor Analysis**

1. The number or proportion of LEP persons in the service area, who may be served or are likely to encounter a goSTAT program, activity or service.

The St. Tammany Parish Government Office of Transportation Administration staff reviewed the 2010 U.S. Census Bureau American Community Survey data. The American Community Survey did not provide data “down” to the Parish level for the state of Louisiana; therefore, the most recent language data available is from the actual 2000 U.S. Census. In analyzing that data, the total population of the parish that speaks only English is 168,403 or 94.70%. The total number of residents who speak another language but speak English, “well,” “not well,” or “not at all” is 2,634 or 1.48%. The group with the highest number of speaking residents, other than English is Spanish. There are 4,420 or 2.49% Spanish speaking residents. Further analysis indicates that there are a total of 1,344 Spanish speaking residents that speak English, “well,” “not well,” or “not at all.” This amount represents a total of 30.41% of this group. The other group with the highest percentage residents who do not speak English is the Asian population. There are 436 Asian speaking residents that speak English, “well,” “not well,” or “not at all.” This amount represents a total of 44.54% of this group. It is important to note that all of the residents that do not speak English at all are 18 or older. All residents under the age of 18 do speak English. Please see the charts below for full information.

| St. Tammany Parish<br>Population 5 years and older spoken at home. |         |
|--|---------|
| Total:   | 177,826 |
| 5 to 17 years:   | 40,901  |
| Speak only English   | 39,357  |
| Spanish or Spanish Creole  | 829     |
| French (incl. Patois, Cajun)                                       | 259     |
| French Creole  | 0       |
| Italian  | 9       |
| Portuguese or Portuguese Creole                                    | 8       |
| German   | 58      |
| Yiddish  | 0       |
| Other West Germanic languages                                      | 45      |
| Scandinavian languages   | 0       |
| Greek  | 26      |
| Russian  | 0       |
| Polish   | 9       |
| Serbo-Croatian   | 6       |
| Other Slavic languages   | 13      |
| Armenian   | 0       |
| Persian  | 0       |
| Gujarathi  | 7       |
| Hindi  | 0       |
| Urdu   | 18      |
| Other Indic languages  | 9       |

|                                       |         |
|---------------------------------------|---------|
| Other Indo-European languages         | 22      |
| Chinese                               | 42      |
| Japanese                              | 8       |
| Korean                                | 22      |
| Mon-Khmer, Cambodian                  | 0       |
| Miao, Hmong                           | 0       |
| Thai                                  | 0       |
| Laotian                               | 0       |
| Vietnamese                            | 76      |
| Other Asian languages                 | 8       |
| Tagalog                               | 25      |
| Other Pacific Island languages        | 25      |
| Navajo                                | 0       |
| Other Native North American languages | 0       |
| Hungarian                             | 8       |
| Arabic                                | 0       |
| Hebrew                                | 0       |
| African languages                     | 0       |
| Other and unspecified languages       | 12      |
| 18 years and over:                    | 136,925 |
| Speak only English                    | 129,046 |
| Spanish or Spanish Creole             | 3,591   |
| French (incl. Patois, Cajun)          | 1,902   |
| French Creole                         | 134     |
| Italian                               | 217     |
| Portuguese or Portuguese Creole       | 63      |
| German                                | 462     |
| Yiddish                               | 0       |
| Other West Germanic languages         | 77      |
| Scandinavian languages                | 61      |
| Greek                                 | 60      |
| Russian                               | 41      |
| Polish                                | 85      |
| Serbo-Croatian                        | 44      |
| Other Slavic languages                | 40      |
| Armenian                              | 8       |
| Persian                               | 5       |
| Gujarathi                             | 15      |
| Hindi                                 | 8       |
| Urdu                                  | 27      |
| Other Indic languages                 | 19      |
| Other Indo-European languages         | 78      |
| Chinese                               | 117     |
| Japanese                              | 76      |
| Korean                                | 90      |

|                                       |     |
|---------------------------------------|-----|
| Mon-Khmer, Cambodian                  | 0   |
| Miao, Hmong                           | 0   |
| Thai                                  | 20  |
| Laotian                               | 0   |
| Vietnamese                            | 208 |
| Other Asian languages                 | 65  |
| Tagalog                               | 132 |
| Other Pacific Island languages        | 65  |
| Navajo                                | 0   |
| Other Native North American languages | 38  |
| Hungarian                             | 0   |
| Arabic                                | 105 |
| Hebrew                                | 0   |
| African languages                     | 26  |
| Other and unspecified languages       | 0   |

| St. Tammany Parish<br>Age by Language Spoken |         |
|--|---------|
| Total:                                       | 177,826 |
| 5 to 17 years:                               | 40,901  |
| Speak only English                           | 39,357  |
| Speak Spanish:                               | 829     |
| Speak English "very well"                    | 540     |
| Speak English "well"                         | 174     |
| Speak English "not well"                     | 115     |
| Speak English "not at all"                   | 0       |
| Speak other Indo-European languages:         | 489     |
| Speak English "very well"                    | 395     |
| Speak English "well"                         | 81      |
| Speak English "not well"                     | 13      |
| Speak English "not at all"                   | 0       |
| Speak Asian and Pacific Island languages:    | 206     |
| Speak English "very well"                    | 116     |
| Speak English "well"                         | 47      |
| Speak English "not well"                     | 43      |
| Speak English "not at all"                   | 0       |
| Speak other languages:                       | 20      |
| Speak English "very well"                    | 8       |
| Speak English "well"                         | 0       |
| Speak English "not well"                     | 12      |
| Speak English "not at all"                   | 0       |
| 18 to 64 years:                              | 117,851 |
| Speak only English                           | 111,092 |

|   |        |
|---|--------|
| Speak Spanish:                            | 3,288  |
| Speak English "very well"                 | 2,326  |
| Speak English "well"                      | 580    |
| Speak English "not well"                  | 340    |
| Speak English "not at all"                | 42     |
| Speak other Indo-European languages:      | 2,597  |
| Speak English "very well"                 | 2,140  |
| Speak English "well"                      | 314    |
| Speak English "not well"                  | 143    |
| Speak English "not at all"                | 0      |
| Speak Asian and Pacific Island languages: | 724    |
| Speak English "very well"                 | 407    |
| Speak English "well"                      | 216    |
| Speak English "not well"                  | 96     |
| Speak English "not at all"                | 5      |
| Speak other languages:                    | 150    |
| Speak English "very well"                 | 134    |
| Speak English "well"                      | 8      |
| Speak English "not well"                  | 8      |
| Speak English "not at all"                | 0      |
| 65 years and over:                        | 19,074 |
| Speak only English                        | 17,954 |
| Speak Spanish:                            | 303    |
| Speak English "very well"                 | 210    |
| Speak English "well"                      | 39     |
| Speak English "not well"                  | 39     |
| Speak English "not at all"                | 15     |
| Speak other Indo-European languages:      | 749    |
| Speak English "very well"                 | 484    |
| Speak English "well"                      | 198    |
| Speak English "not well"                  | 67     |
| Speak English "not at all"                | 0      |
| Speak Asian and Pacific Island languages: | 49     |
| Speak English "very well"                 | 20     |
| Speak English "well"                      | 9      |
| Speak English "not well"                  | 5      |
| Speak English "not at all"                | 15     |
| Speak other languages:                    | 19     |
| Speak English "very well"                 | 9      |
| Speak English "well"                      | 0      |
| Speak English "not well"                  | 10     |
| Speak English "not at all"                | 0      |

2. The frequency with which LEP persons come in contact with goSTAT programs, activities or services.

The St. Tammany Parish Grants Department assessed the frequency in which staff and drivers have or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. To date, Reliant Transportation has reported only one incident of an LEP individual attempting to make a reservation on a goSTAT vehicle.

3. The nature and importance of programs, activities or services provided by goSTAT to the LEP population.

The largest geographic concentration of LEP individuals in the goSTAT service area is Spanish; however, the percentage is a very low 0.03% of the Spanish group that does not speak English at all. The St. Tammany Parish Grants Department has looked at the Census Tracts within the parish that displays the highest levels of non English speaking residents (see attached map).

Due to the nature of the current demand response service provided by goSTAT, there is no specific area that we can concentrate our LEP efforts.

4. The resources available to goSTAT and overall cost to provide LEP assistance.

The St. Tammany Parish Grants Department assessed its available resources that could be used for providing LEP assistance. This includes: determining how much a professional interpreter and translation service would cost on an as needed basis, which goSTAT documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the St. Tammany Parish Grants Department could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered.

The St. Tammany Parish Grants Department, in further developing this LEP Plan, will explore through our partnership with the Regional Planning Commission, as the Parish's MPO, additional resource capabilities for language assistance that may be offered throughout St. Tammany Parish and the New Orleans Region. The most cost effective language assistance can be provided orally through interpretation services. With such a small population of LEP individuals likely to use transit, it is initially not cost effective to engage in translating and publishing goSTAT brochures into other languages.

Based on the four-factor analysis, The St. Tammany Parish Grants Department developed its LEP Plan as outlined in the following section.



## **Limited English Proficiency (LEP) Plan**

### **Limited English Proficiency (LEP) Plan Outline**

How goSTAT staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to goSTAT sponsored events. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at goSTAT meetings. This will assist goSTAT in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language Identification Flashcards on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to goSTAT's management for follow-up.
5. Vehicle operators and other front-line staff, like dispatchers and reservationist will be surveyed on their experience concerning any contacts with goSTAT persons during the previous year.

### **Language Assistance Measures**

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which goSTAT staff responds to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on goSTAT programs and services;
- Provide a bilingual staff at community events and public hearings as well as on the goSTAT reservation phone lines.
- To the extent feasible assign bilingual drivers to vehicle runs serving groups with a high concentration of LEP riders.
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Survey bus drivers and other front-line staff, like dispatchers, and reservationist annually on their experience concerning any contacts with LEP persons during the previous year;



- Post the goSTAT Title VI Policy and LEP Plan on the Parish website, [www.stpgov.org/gostat.php](http://www.stpgov.org/gostat.php);
- Include language “Spanish a plus” on bus driver recruitment flyers and onboard recruitment posters;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. A list of volunteers will need to be developed.

### **Staff Training**

The following training will be provided to goSTAT staff:

1. Information on the goSTAT Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.
5. How to handle a potential Title VI/LEP complaint.

### **Outreach Techniques**

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

### **Monitoring and Updating the LEP Plan**

goSTAT will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when further data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the goSTAT service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually;
- How the needs of LEP persons have been addressed;
- Determination of the current LEP population in the service area;
- Determination as to whether the need for translation services has changed;

- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether goSTAT's financial resources are sufficient to fund language assistance resources needed;
- Determine whether goSTAT has fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning goSTAT's failure to meet the needs of LEP individuals.

#### **Dissemination of the goSTAT's LEP Plan**

A link to the goSTAT's LEP Plan and the Title VI Procedures is included on the St. Tammany Parish website at [www.stpgov.org/gostat.php](http://www.stpgov.org/gostat.php).

Any person or agency with internet access will be able to access and download the plan from the St. Tammany Parish goSTAT website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which St. Tammany Parish will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the St. Tammany Parish Government, Grants Department, Administrator:

St. Tammany Parish Government  
Grants Department  
21410 Koop Drive  
Mandeville, LA 70471  
Phone: 985-809-2989  
Fax: 985-276-6410  
Email: [pfelarise@stpgov.org](mailto:pfelarise@stpgov.org) (goSTAT Administrator)

**MEMBERSHIP OF NONELECTED OFFICIALS**

goSTAT transit service does not function with a transit related non-elected board. The Office of Transit is part of the St. Tammany Parish Grants Department. The publically elected St. Tammany Parish Council must approve any increase in fares for the transit services.

**SUBRECIPIENT MONITORING**

goSTAT does not have any sub-recipients of Federal Transit Administration funds.

**TITLE VI EQUITY ANALYSIS FOR TRANSIT CONSTRUCTED FACILITIES**

St. Tammany Parish will conduct the proper Title VI Equity Analysis on any transit constructed facilities during the planning phase of the project. At this time there are no projects in the initial planning phase.

**COUNCIL RESOLUTION**

(Council Resolution to be inserted upon Council approval)