

ST. TAMMANY PARISH COUNCIL

RESOLUTION

RESOLUTION COUNCIL SERIES NO: C-6575

COUNCIL SPONSOR: COOPER/BINDER

PROVIDED BY: GRANTS DEPARTMENT

A RESOLUTION ADOPTING 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;

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;

NOW, THEREFORE, BE IT RESOLVED by the St. Tammany Parish Council hereby adopts 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 3 DAY OF MARCH, 2022, AT A REGULAR MEETING OF THE PARISH COUNCIL, A QUORUM OF THE MEMBERS BEING PRESENT AND VOTING.

JERRY BINDER, COUNCIL CHAIRMAN

ATTEST:

KATRINA L. BUCKLEY, COUNCIL CLERK



Title VI Program
Department of Grants/STAR Transit
May, 2022

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POLICY STATEMENT:

St Tammany Parish Government, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Louisiana Department of Transportation and Development (LADOTD), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and LADOTD Public Transportation requirements as specified in Master Grant Agreement and State Management Plan.

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 pfelarise@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, 5th 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 PROCESS

STAR Transit grants all citizens equal access to all its transportation services. It is further the intent of STAR Transit that all citizens are aware of their rights to such access. This process document is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of STAR Transit services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI

Title VI is a section of the Civil Rights Act of 1964 requiring that “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.” Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

Who are Limited English Proficient Persons?

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or “LEP.” These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

How do I file a complaint?

If you believe that you have received discriminatory treatment by STAR Transit on the basis of your race, color or national origin, you have the right to file a complaint with St. Tammany Parish Grant Project Manager-Transit. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

Methods of filing a Complaint

The preferred method is to file your complaint in the online complaint form located at <http://www.stpgov.org/files/STARTransitTitleVIComplaintForm.pdf>

You can obtain a hard copy of the Title VI Complaint Form by calling (985) 809-2989 or emailing startransit@stpgov.org.

The form can be mailed to:

**St. Tammany Department of Grants
Grants Project Manager-Transit
Post Office Box 628
Covington, LA, 70434**

In addition, a complaint can be filed with the Federal Transit Administration (FTA) by completing the FTA complaint form located at:

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Consolidated_Civil_Rights_Complaint_Form.pdf

The complaint form should be emailed to FTACivilRightsCommunications@dot.gov with “FTA complaint form” included in the subject line.

Alternatively, FTA complaints may be mailed to:

**Director, FTA Office of Civil Rights
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590**

Should a complaint be filed with STAR Transit and an external entity simultaneously, the external complaint shall supersede the STAR Transit complaint and the STAR Transit complaint procedures will be suspended pending the external entity’s findings.

Investigations

Within 10 working days of receipt of the formal complaint, the St. Tammany Parish Grants Project Manager-Transit will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 90-days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the St. Tammany Parish Grants Project Manager-Transit for submittal to the Chief Administrative Officer. The complainant will receive a letter stating that final decision by the end of the 90-day time limit.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the FTA.

If the complainant is dissatisfied with the determination and/or resolution set forth by STAR Transit, the same complaint may be submitted to the FTA for investigation.

A copy of the complaint and STAR Transit’s investigation report/letter of finding and final remedial action plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.

A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

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

The St. Tammany Parish Government maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
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 STAR Transit 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.

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 STAR Transit 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 264,570 residents in St. Tammany Parish according to the 2020 U.S. Census Bureau. 74.3 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 12.7 percent of the total population of the parish. Hispanic persons account for 5.9 percent of the population. There are also a small number of American Indian/Alaska native (0.6 percent). Persons who consider themselves to be of more than one race account for 2.0 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. STAR 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. 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.

Figure 1
St. Tammany Parish Population
(Source: 2020 US Census Bureau)

Category	Number	% of Population
Total	264,570	100.00%
White	220,122	83.2%
Black	33,600	12.7%
Hispanic	15,610	5.9%
Two or more races	5,291	2.0%
Asian	3,969	1.5%
American Indian/Alaska Native	1,587	0.6%

Low-income: In St. Tammany Parish, 11.1 percent of the population is below the local poverty level. 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 will be to ensure that agency/advocacy groups have information on STAR Transit services.

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 and cliental is of critical concern to private sector employers.

Public Participation Plan

This document, upon its adoption, is to serve as the PPP for STAR 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.

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

STAR Transit
PO Box 628
Covington, LA 70434
Phone: 985-809-2989
Contact: Perry Felarise, Grants Project Manager-Transit, 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 St. Tammany Parish Department of Grants Office, located at 21454 Koop Drive, Room 327, Mandeville, and on the STAR Transit website: www.stpgov.org/residents/transportation.

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.
- Information on the Parish's social media platforms.
- 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 STAR Transit Office, located at 21410 Koop Drive in Mandeville. Electronic versions of the documents will be available on the STAR Transit website: www.stpgov.org/residents/transportation.

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.

Public Participation Plan Stakeholders List

American Red Cross
Archdiocese of New Orleans Hispanic Apostolate
Florida Parishes Human Services Authority
Good Samaritan Ministry
Lakeview Regional Medical Center
Louisiana Department of Transportation
Northlake Crisis Pregnancy Center
Puentes New Orleans
Regional Planning Commission, New Orleans
The Samaritan Center
Slidell Adult Daycare Inc.
St. Tammany Parish School Board
St. Tammany Parish Hospital
STARC of Louisiana, Inc.
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 operate STAR Transit, a demand response transit service. The Parish Government has a contract with the St. Tammany Council on Aging (COAST) 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 STAR Transit. 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 STAR Transit program, activity or service.
2. The frequency with which LEP persons come in contact with STAR Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by STAR Transit to the LEP population.
4. The resources available to STAR Transit 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 STAR Transit program, activity or service.

The St. Tammany Parish Government Department of Grants staff reviewed the 2015-2019 U.S. Census Bureau American Community Survey 5 Year Estimates data. In analyzing the data, the total population of the parish (Ages 5 years and older) that speaks only English is 224,028 or 93.4%. The total number of residents who speak a language other than English is 15,814 or 6.6%. The group with the highest number of speaking residents, other than English is Spanish. There are 9,568 or 4.0% Spanish-speaking residents. Further analysis indicates there are a total of 5,051 or 52.8% Spanish-speaking residents that speak English, “very well,” while 4,517 or 47.2% speak English, “less than very well.” There are 3,455 or 1.4% Other Indo-European language speaking residents in St. Tammany Parish. Of this total, 2,377 or 68.8% speak English, “very well,” while 1,078 or 45.4% speak English, “less than very well.” 2,173 or 0.9% of the population speaks Asian and Pacific Island languages. 1,054 speak English, “very well,” while 1,119 speak English, “less than very well.” There are 618 or 0.3% Other Language speaking residents in the Parish. Of this total, 554 or 89.6% speak English, “very well,” while 64 or 10.4% speak English, “less than very well.” (see Figure 2)

FIGURE 2
ST TAMMANY PARISH

Label	Estimate	Margin of Error
Total:	239,842	±70
5 to 17 years:	46,139	±69
Speak only English	43,294	±503
Speak Spanish:	1,837	±431
Speak English "very well"	1,083	±297
Speak English "well"	437	±202
Speak English "not well"	317	±188
Speak English "not at all"	0	±30
Speak other Indo-European languages:	568	±202
Speak English "very well"	472	±187
Speak English "well"	25	±27
Speak English "not well"	71	±73
Speak English "not at all"	0	±30
Speak Asian and Pacific Island languages:	300	±125
Speak English "very well"	204	±117
Speak English "well"	80	±72
Speak English "not well"	16	±28
Speak English "not at all"	0	±30
Speak other languages:	140	±132
Speak English "very well"	140	±132
Speak English "well"	0	±30
Speak English "not well"	0	±30
Speak English "not at all"	0	±30
18 to 64 years:	151,880	±130
Speak only English	140,826	±933
Speak Spanish:	6,773	±711
Speak English "very well"	3,416	±516
Speak English "well"	1,055	±341
Speak English "not well"	1,727	±418
Speak English "not at all"	575	±260
Speak other Indo-European languages:	2,157	±373
Speak English "very well"	1,434	±309
Speak English "well"	348	±164
Speak English "not well"	375	±171
Speak English "not at all"	0	±30
Speak Asian and Pacific Island languages:	1,726	±466
Speak English "very well"	797	±247
Speak English "well"	370	±177
Speak English "not well"	394	±179
Speak English "not at all"	165	±150
Speak other languages:	398	±136
Speak English "very well"	366	±142
Speak English "well"	32	±53
Speak English "not well"	0	±30
Speak English "not at all"	0	±30
65 years and over:	41,823	±130
Speak only English	39,908	±287
Speak Spanish:	958	±176
Speak English "very well"	552	±155
Speak English "well"	195	±105
Speak English "not well"	46	±37
Speak English "not at all"	165	±136
Speak other Indo-European languages:	730	±236
Speak English "very well"	471	±140
Speak English "well"	177	±174
Speak English "not well"	56	±46
Speak English "not at all"	26	±43
Speak Asian and Pacific Island languages:	147	±119
Speak English "very well"	53	±59
Speak English "well"	17	±29
Speak English "not well"	77	±93
Speak English "not at all"	0	±30
Speak other languages:	80	±62
Speak English "very well"	48	±47
Speak English "well"	0	±30
Speak English "not well"	32	±36
Speak English "not at all"	0	±30

2. The frequency with which LEP persons encounter STAR Transit 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, COAST has not reported any incidents of an LEP individual attempting to make a reservation on a STAR Transit vehicle.

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

The largest geographic concentration of LEP individuals in the STAR Transit service area is Spanish. The St. Tammany Parish Grants Department has looked at the Census Tracts within the parish that display the highest levels of non-English speaking residents; however, due to the nature of the demand response service provided by STAR Transit, there are no specific areas in which staff can concentrate our LEP efforts.

4. The resources available to STAR Transit 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 STAR Transit 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 STAR Transit 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 STAR Transit 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 STAR Transit 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 STAR Transit meetings. This will assist STAR Transit 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 STAR Transit'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 STAR Transit 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 STAR Transit 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 STAR Transit programs and services;
- Provide a bilingual staff at community events and public hearings as well as on the STAR Transit 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 STAR Transit Title VI Policy and LEP Plan on the Parish website, www.stpgov.org/resident/transportation.
- 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 STAR Transit staff:

1. Information on the STAR Transit 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

STAR Transit will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when further data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the STAR Transit 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 STAR Transit's financial resources are sufficient to fund language assistance resources needed;
- Determine whether STAR Transit has fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning STAR Transit's failure to meet the needs of LEP individuals.

Dissemination of the STAR Transit's LEP Plan

A link to the STAR Transit's LEP Plan and the Title VI Procedures is included on the St. Tammany Parish website at www.stpgov.org/resident/transportation.

Any person or agency with internet access will be able to access and download the plan from the St. Tammany Parish STAR Transit 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

St. Tammany Parish Government
Grants Department
21454 Koop Drive, Room 327
Mandeville, LA 70471
Phone: 985-809-2989
Email: pfelarise@stpgov.org (Grants Project Manager-Transit)

MEMBERSHIP OF NONELECTED OFFICIALS

STAR Transit service does not function with a transit related non-elected board. The Parish's transit staff are 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

STAR Transit 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

ST. TAMMANY PARISH COUNCIL
RESOLUTION

RESOLUTION COUNCIL SERIES NO. _____

COUNCIL SPONSOR: COOPER/BINDER PROVIDED BY: GRANTS DEPARTMENT

A RESOLUTION ADOPTING 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;

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;

NOW, THEREFORE, BE IT RESOLVED by the St. Tammany Parish Council hereby adopts 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 _____ DAY OF _____ 2022 AT A REGULAR MEETING OF THE PARISH COUNCIL, A QUORUM OF THE MEMBERS BEING PRESENT AND VOTING.

JERRY BINDER, COUNCIL CHAIRMAN

ATTEST:

KATRINA BUCKLEY, COUNCIL CLERK

ADMINISTRATIVE COMMENT

The Federal Transit Administration requires each recipient of transit funds to have a Title VI Program. The Title VI Program ensures that the Parish operates its transit services without regards to race, color or national origin in accordance with Title VI of the Civil Rights Act. The Parish's current plan is set to expire in July, 2022.