



Title VI Program
Department of Grants/STAR Transit
May, 2019

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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 PROCEDURES

STAR Transit is committed to providing reliable, safe, and satisfying transportation options for the community. The Parish's transportation program is an important part of St. Tammany Parish, as such, the community's input is crucial to the growth and development of the program.

The STAR Transit Complaint Policy has been established to ensure that riders of the system have an easy and accessible way to provide feedback to the agency. STAR Transit 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 STAR Transit 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 STAR Transit services 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 Department of Grants should be contacted.
2. Any complaints or maintenance requests regarding park and rides should be sent directly to St. Tammany Parish Grants Project Manager-Transit.
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/STAR Transit.
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/STAR Transit;
- A statement of the complaint, including specific details, relevant facts and documentation will be filed at the St. Tammany Parish Department of Grants.

The St. Tammany Parish Government/STAR Transit 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/STAR Transit 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/STAR Transit 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 Grants Project Manager-Transit will render a recommendation for action in a report of findings or resolution.
3. Within ninety (90) days, the St. Tammany Parish Grants Project Manager-Transit 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 Grants Project Manager-Transit, he/she may file an appeal within 10 working days with the St. Tammany Parish Chief Administrative Officer (CAO). The St. Tammany Parish CAO 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 Parish's CAO, 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/STAR Transit 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/STAR Transit 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 STAR Transit, Grants Project Manager-Transit, P.O Box 628, Covington, LA 70434, by phone (985) 809-2989 or by email pfelarise@stpgov.org. The Parish encourages all complaints to be submitted in writing.

The Grants Project Manager-Transit will review and investigate every incident/complaint promptly. Reasonable measures will be taken to preserve any information that is confidential. At a minimum, the Grants Project Manager-Transit 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 Grants Project Manager-Transit will complete a final report for the Parish CAO. 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

STAR Transit 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 filled 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, Grants Project Manager-Transit, Post Office Box 628, Covington, LA 70434.

Name:	Phone:
Street Address:	Alt Phone:
City, State & Zip Code	Email Address:
Person(s) discriminated against (if someone other than complainant):	
Name(s):	
Street Address, City, State & Zip:	

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 STAR Transit 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

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.

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 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 256,327 residents in St. Tammany Parish according to the 2017 U.S. Census Bureau American Community Survey. 83.7 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 12.2 percent of the total population of the parish. Hispanic persons account for 5.8 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 1.9 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. 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, American Community Survey 2017)

Category	Number	% of Population
Total	256,327	100.00%
White	214,546	83.7%
Black	31,272	12.2%
Hispanic	14,867	5.8%
Two or more races	4,870	1.9%
Asian	3,845	1.5%
American Indian/Alaska Native	1,538	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 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 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, 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 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.

St. Tammany Area 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.
- Articles in community newsletters.
- 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.

Appendix A

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 2013-2017 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 219,313 or 93.6%. The total number of residents who speak a language other than English is 15,012 or 6.4%. The group with the highest number of speaking residents, other than English is Spanish. There are 8,861 or 3.8% Spanish-speaking residents. Further analysis indicates there are a total of 4,793 or 54.9% Spanish-speaking residents that speak English, "very well," while 4,068 or 45.9% speak English, "less than very well." There are 3,399 or 1.5% Other Indo-European language speaking residents in St. Tammany Parish. Of this total, 2,315 or 68.1% speak English, "very well," while 1,084 or 31.9% speak English, "less than very well." 2,322 or 1.0% of the population speaks Asian and Pacific Island languages. 1,194 speak English, "very well," while 1,128 speak English, "less than very well." There are 430 or 0.2% Other Language speaking residents in the Parish. Of this total, 262 or 60.9% speak English, "very well," while 168 or 39.1% speak English, "less than very well."

Subject	St. Tammany Parish, Louisiana													
	Total		Percent		Percent of specified language speakers									
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"			
Population 5 years and over	234,385	+/-73	(X)	(X)	227,937	+/-813	97.2%	+/-0.3	6,448	+/-796	2.8%	+/-0.3		
Speak only English	219,373	+/-1,065	93.6%	+/-0.4	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)		
Speak a language other than English	15,012	+/-1,054	6.4%	+/-0.4	8,584	+/-699	57.0%	+/-3.7	6,448	+/-796	43.0%	+/-3.7		
SPEAK A LANGUAGE OTHER THAN ENGLISH														
Spanish	8,861	+/-859	3.8%	+/-0.4	4,793	+/-626	54.1%	+/-5.7	4,068	+/-689	45.9%	+/-5.7		
5 to 17 years old	1,547	+/-378	0.7%	+/-0.2	1,078	+/-313	69.7%	+/-11.8	469	+/-219	30.3%	+/-11.8		
18 to 64 years old	6,612	+/-620	2.8%	+/-0.3	3,340	+/-460	50.5%	+/-6.2	3,272	+/-552	49.5%	+/-6.2		
65 years old and over	702	+/-117	0.3%	+/-0.1	375	+/-113	53.4%	+/-13.5	327	+/-109	46.6%	+/-13.5		
Other Indo-European languages	3,399	+/-618	1.5%	+/-0.3	2,315	+/-429	68.1%	+/-6.0	1,084	+/-310	31.9%	+/-6.0		
5 to 17 years old	322	+/-143	0.1%	+/-0.1	245	+/-127	76.1%	+/-19.4	77	+/-69	23.9%	+/-19.4		
18 to 64 years old	2,256	+/-439	1.0%	+/-0.2	1,553	+/-330	68.8%	+/-7.8	703	+/-234	31.2%	+/-7.8		
65 years old and over	821	+/-284	0.4%	+/-0.1	517	+/-180	63.0%	+/-17.7	304	+/-202	37.0%	+/-17.7		
Asian and Pacific Island languages	2,322	+/-399	1.0%	+/-0.2	1,194	+/-266	51.4%	+/-9.1	1,128	+/-307	48.6%	+/-9.1		
5 to 17 years old	462	+/-153	0.2%	+/-0.1	289	+/-134	62.6%	+/-19.4	173	+/-101	37.4%	+/-19.4		
18 to 64 years old	1,431	+/-249	0.6%	+/-0.1	792	+/-190	55.3%	+/-10.3	639	+/-195	44.7%	+/-10.3		
65 years old and over	429	+/-159	0.2%	+/-0.1	113	+/-79	26.3%	+/-20.6	316	+/-167	73.7%	+/-20.6		
Other languages	430	+/-218	0.2%	+/-0.1	262	+/-151	60.9%	+/-26.2	168	+/-161	39.1%	+/-26.2		
5 to 17 years old	41	+/-45	0.0%	+/-0.1	41	+/-45	100.0%	+/-48.1	0	+/-29	0.0%	+/-48.1		
18 to 64 years old	382	+/-198	0.2%	+/-0.1	214	+/-118	56.0%	+/-28.8	168	+/-161	44.0%	+/-28.8		
65 years old and over	7	+/-11	0.0%	+/-0.1	7	+/-11	100.0%	+/-100.0	0	+/-29	0.0%	+/-100.0		
CITIZENS 18 YEARS AND OVER														
All citizens 18 years old and over	184,173	+/-662	(X)	(X)	180,787	+/-766	98.2%	+/-0.3	3,386	+/-511	1.8%	+/-0.3		
Speak only English	174,927	+/-670	95.0%	+/-0.4	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)		
Speak a language other than English	9,246	+/-786	5.0%	+/-0.4	5,860	+/-570	63.4%	+/-4.1	3,386	+/-511	36.6%	+/-4.1		
Spanish	5,120	+/-588	2.8%	+/-0.3	3,264	+/-468	63.8%	+/-5.9	1,896	+/-378	36.3%	+/-5.9		
Other languages	4,126	+/-515	2.2%	+/-0.3	2,596	+/-374	62.9%	+/-5.0	1,530	+/-290	37.1%	+/-5.0		

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 inquires 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 or Spanish Creole. 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, Administrator:

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: C-6112

COUNCIL SPONSOR: BRISTER/LORINO PROVIDED BY: GRANTS DEPARTMENT

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; 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 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: MR. BELLISARIO SECONDED BY: MR. STEFANCIK

YEAS: DEAN, FITZGERALD, LORINO, TOLEDANO, TANNER, GROBY, BELLISARIO, O'BRIEN, STEFANCIK, BINDER, BLANCHARD, SMITH (12)

NAYS: (0)

ABSTAIN: (0)

ABSENT: THOMPSON, CANULETTE (2)

THIS RESOLUTION WAS DECLARED ADOPTED ON THE 2 DAY OF MAY, 2019, AT A REGULAR MEETING OF THE PARISH COUNCIL, A QUORUM OF THE MEMBERS BEING PRESENT AND VOTING.


MICHAEL R. LORINO, JR., COUNCIL CHAIRMAN

ATTEST:

THERESA L. FORD, COUNCIL CLERK