

Title VI Plan

Regional Planning Commission

Jefferson, Orleans, Plaquemines, St. Bernard and St. Tammany Parishes

March, 2010

TITLE VI PLAN

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*Prepared by the
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This Plan is based in part on the Title VI Plan - Seattle (Washington) Office for Civil Rights.
And the Title VI Plan - Baton Rouge Area Capital Region Planning Commission

Title VI – Nondiscrimination in Federally Assisted Programs
Civil Rights Act of 1964
42 USC 2000(d)-2000(d)(l)

General

This title declares it to be the policy of the United States that discrimination on the grounds of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy. This title is not intended to apply to foreign assistance programs.

Section 601 – states the general principle that no person in the United States shall be excluded from participation in or otherwise discriminated against on the grounds of race, color, or national origin under any program or activity receiving federal financial assistance.

Section 602 – directs each federal agency administering a program of federal financial assistance by way of grant, contract, or loan to take action pursuant to rule, regulation, or order of general applicability to effectuate the principle of section 601 in a manner consistent with the achievement of the objectives of the statute authorizing the assistance. In seeking the effect compliance with its requirements imposed under this section, an agency is authorized to terminate or to refuse to grant or to continue assistance under a program to any recipient as to whom there has been an express finding pursuant to hearing of a failure to comply with the requirements under that program, and it may also employ any other means authorized by law. However, each agency is directed first to seek compliance with its requirements by voluntary means.

Section 603 -- provides that any agency action taken pursuant to section 602 shall be subject to such judicial review as would be available for similar actions by that agency on other grounds. Where the agency action consists of terminating or refusing to grant or to continue financial assistance because of a finding of a failure of the recipient to comply with the agency's judicial review under existing law, judicial review shall nevertheless be available to any person aggrieved as provided in section 10 of the Administrative Procedure Act (5USC 1009). The section also states explicitly that in the latter situation such agency action shall not be deemed committed to unreviewable agency discretion within the meaning of section 10. The purpose of this provision is to obviate the possible argument that although section 603 provides for review in accordance with section 10, section 10 itself has an exception for action "committed to agency discretion," which might otherwise be carried over into section 603. It is not the purpose of this provision of section 603, however, otherwise to alter the scope of judicial review as presently provided in section 10(e) of the Administrative Procedure Act.

Introduction

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides 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 and program or activity receiving federal financial assistance.

The Regional Planning Commission for Jefferson, Orleans, Plaquemines, St. Bernard and St. Tammany Parishes (referred to throughout as 'RPC' and 'Commission') is the recipient of federal-aid highway funds authorized under Titles I and V of the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA), Pub. L. 102-240, 105 Stat. 1914, or Titles I, III, and V of the Transportation Equity Act for the 21st Century (TEA-21), Pub. L. 105-178, 112 Stat. 107. The Regional Planning Commission is the recipient of federal transit funds authorized by Titles I, III, V, and VI of ISTEA, Pub. L. 102-240 or by federal transit laws in Title 49, U.S. Code, or Titles I, II, and V of the TEA-21, Pub. L. 105-178. The Regional Planning Commission is the recipient of federal airport funds authorized by 49 U.S.C. 471 01, et seq.

As such, The Regional Planning Commission is subject to the requirements of Title VI and the information reporting requirements established by the Federal Transit Administration (FTA) to evaluate the level of compliance concerning the provision of transit services and related benefits.

Title VI Plan Policy Statement

The Regional Planning Commission (RPC) assures that no person shall, on the grounds of race, color, sex, age, disability, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. RPC further assures that every effort will be made to ensure nondiscrimination in all of its programs or activities, whether these programs and activities are federally funded or not.

In the event that RPC contracts to distribute federal aid funds to another entity, Title VI language will be included in all written agreements and the recipient will be monitored for compliance.

The Title VI Coordinator designated in the Plan is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.

Walter R. Brooks

Walter R. Brooks, Executive Director

Date

6/21/10

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, income, gender, age, or disability, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.0 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [2.557] March 22, 1988).

Environmental Justice (EJ) (Executive Order 12898) addresses disproportionate adverse environmental, social and economic impacts that may exist in communities, specifically minority and low-income populations.

Limited English Proficiency (LEP) (Executive Order 13166) addresses access to services for persons whose primary language is not English and who have a limited ability to read, write, speak or understand English.

Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities and transportation.

Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 324) prohibits discrimination based on handicap/disability.

Additional Authorities and Citations may be found under Table of Authorities, Title VI Legal Manual, U.S. Department of Justice, Civil Rights Division at <http://www.usdoj.gov/crt/corlcoord/vimannual.htm>.

Title VI Delegation Chart

State of Louisiana
Bobby Jindal, Governor
866-366-1121 (toll free)

Regional Planning Commission
Billy Nungesser, Chairman
Walter R. Brooks, Executive Director
504-483-8512

Title VI Coordinator
for Regional Planning Commission
Nik Richard
504-483-8535

Organization and Staffing – General

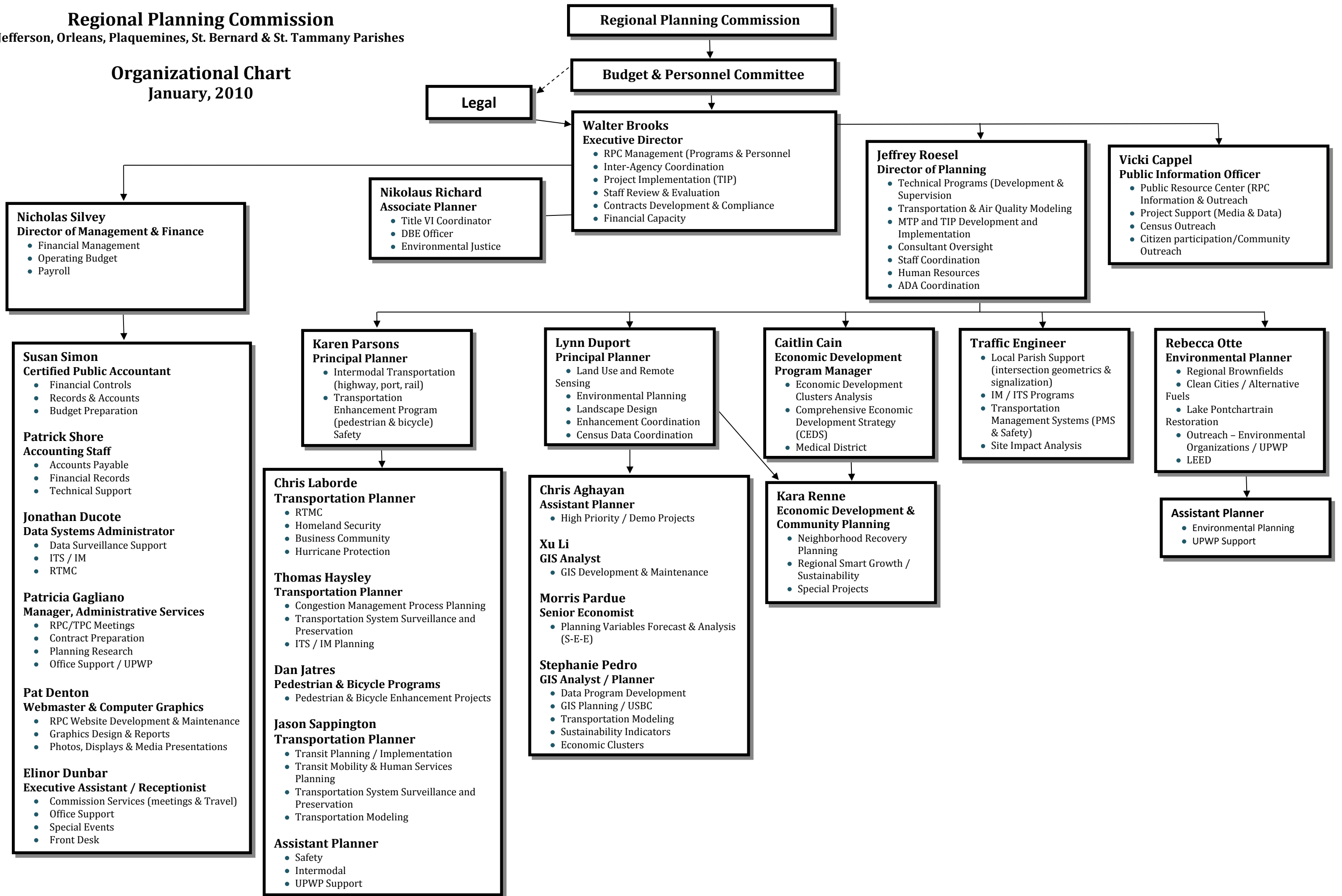
The Executive Director of the Regional Planning Commission is responsible for ensuring the implementation of the Commission’s Title VI Plan. The Title VI Coordinator, on behalf of the Executive Director, is responsible for the overall management of the Title VI programs, and serves as the Title VI Liaison Officer, DBE Liaison Officer, and LEP Coordinator. The Director of Planning is currently responsible for all ADA programs and serves as the ADA Coordinator. The day-to-day administration of the plan lies with the Title VI Coordinator (hereafter referred to as “Coordinator”) under the direct supervision of the Executive Director of the Regional Planning Commission.

As shown on the organization chart, the RPC is headed by Executive Director, Walter R. Brooks. RPC’s Nik Richard serves the role of Title VI Coordinator and assumes all Coordinator responsibilities. Jeffrey W. Roesel serves as the Director of Planning as well as the ADA Coordinator.

The staffing chart is listed on the following page.

Regional Planning Commission
Jefferson, Orleans, Plaquemines, St. Bernard & St. Tammany Parishes

Organizational Chart
January, 2010



Program Administration – General

As Title VI Liaison Officer, the Coordinator shall be responsible for coordinating the overall administration of the Title VI program, plan, and assurances. The Coordinator serves under direct supervision of the Executive Director, and is responsible for the program's day-to-day administration.

A. Complaints

If any individual believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex, disability or age, they may exercise their right to file a complaint with the Louisiana Department of Transportation. Every effort will be made to resolve complaints informally.

B. Data Collection

Statistical data on race, color, national origin and sex of participants in, and beneficiaries of federally funded programs, (e.g., impacted citizens and affected communities), will be gathered and maintained by the Coordinator. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

C. Title VI Program Reviews

The Commission's Title VI Program reviews will be performed by the Title VI Coordinator to assess the office's administrative procedures, staffing, and resources available for Title VI compliance. This is in addition to the day to day monitoring. The Title VI Coordinator will coordinate efforts to ensure equal participation in all programs and activities at all levels. The Title VI Coordinator will conduct reviews of contractors, subcontractors, consultants, suppliers and all other subrecipients of RPC's federal funds to ensure compliance with Title VI provisions.

D. Operational Guidelines/Program Directives

All operational guidelines to contractors, subrecipients, and program planning areas will be reviewed annually to include Title VI language and provisions and related requirements, where applicable.

E. Training Program

Title VI training will be made available at least annually to employees, contractors, subrecipients, and program planning area liaisons. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints. A summary of the training conducted will be reported in the annual update.

F. Annual Reports

An annual executive summary will be submitted to the Executive Director by the Coordinator. The summary will review Title VI accomplishments achieved during the year. The Title VI Coordinator will be responsible for coordination and preparation of the report.

G. Title VI Plan Update

A Title VI Plan Update will be submitted to the Louisiana Department of Transportation and Development (LDOTD) by October 1 of each year. The update will report on accomplishments and changes to the program occurring during the preceding year, and will also include goals and objectives for the upcoming year.

H. Public Dissemination

The Title VI Coordinator will disseminate Title VI Program information to Commission employees, subrecipients, contractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation in the vicinity of proposed projects and announcements of hearings and meetings in minority publications.

The Title VI Plan is easily available on the RPC website, in person at the RPC office, and can be mailed out upon request.

I. Post-grant Reviews

Review post-grant approval procedures (e.g. highway location design, relocation and individuals seeking contracts, etc.) to ensure compliance with Title VI requirements.

J. Elimination of Discrimination

Implement procedures to identify and eliminate discrimination when found to exist, related to Minority/Women Disadvantage Business Enterprises (DBE) contractors, and public involvement.

K. Remedial Action

The Commission will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. Should irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and such actions will be reduced to writing in the form of a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

- 1) Subrecipients placed in a deficiency status will be given a reasonable time, (not to exceed 90 days after receipt of the deficiency letter), to voluntarily correct deficiencies.
- 2) The Commission will seek the cooperation of the subrecipient in correcting deficiencies found during the review. The Commission will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.
- 3) When a subrecipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the Commission will submit to LDOTD's External Civil Rights Office or the FHWA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.
- 4) A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

L. Procedures Manual

Administration of the Title VI Program will be incorporated in a Procedures Manual that will be updated regularly to incorporate changes and additional responsibilities.

Title VI Coordinator Responsibilities

The Title VI Coordinator is charged with the responsibility for implementing, monitoring and ensuring the Commission's compliance with Title VI Regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received by the Commission.
2. Conduct annual Title VI reviews to determine the effectiveness of program activities at all levels.
3. Conduct Title VI reviews of consultant contractors, suppliers, and other recipients of federal-aid contracts administered through the Commission.
4. Prepare a yearly report of Title VI accomplishments and goals, as required.
5. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
6. Identify and eliminate discrimination.
7. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.
8. Conduct annual reviews of all subrecipients and consultants to make sure they maintain compliance with Title VI.
9. Meet with other RPC staff, as needed, to train, monitor and discuss progress, implementation, and compliance issues.
10. Process all Title VI complaints made in person at the RPC office or online on the RPC website.
11. Review important Title VI-related issues with the Executive Director of RPC, as needed.

Title VI Responsibilities for the Agency's Program Areas

Planning

- ▶ Ensure that all aspects of the planning process operation comply with Title VI.
- ▶ Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic gender related organizations and participating in roundtable meetings in predominantly minority communities.
- ▶ Assist the Title VI Coordinator in gathering and organizing the Annual Title VI Update Report.
- ▶ Review the department work program and other directives to ensure compliance with Title VI program requirements.

- ▶ Visit public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.

Education and Training

The Title VI Coordinator will seek all opportunities to participate in education and training outside of the RPC office. All Title VI conferences, seminars, trainings and classes presented by FHWA, FTA, and LADOTD will be considered for staff attendance.

The Title VI Coordinator will be responsible to inform all staff members and consultants of all federal Title VI policies including any changes and updates. The Coordinator will also be responsible to inform all staff members and consultants of the RPC **Title VI Plan**, including our **DBE Policy and Program, LEP Plan, Public Involvement Plan, Environmental Justice Policy, and ADA Policy**, as well as any updates and changes.

Education and Training may also consist of the Regional Traffic Management Center (RPC office) hosting training seminars related to all Title VI issues and inviting all interested and pertaining parties to attend.

- ▶ The Title VI Coordinator will monitor the selection of participants interested in taking part in the National Highway Institute Training workshops. The monitoring will consist of making sure ethnicity is used in the selection process.
- ▶ The Title VI Coordinator will be briefed when training for the National Highway Institute courses or workshops becomes available for Commission employees. For the purpose of fairness in the selection process, the Title VI Coordinator will review on a case by case basis, if equal opportunity was used in the selection of individuals referred for training.
- ▶ In conjunction with managers and executives, ensures that all employees have equal access to training.
- ▶ Ensures accessibility to Minority/Women Disadvantage Business Enterprise consulting/training firms to compete for training contracts.
- ▶ Maintain program administration documentation and data necessary for preparation of Annual Title VI Update.
- ▶ Reviews directives and manuals to ensure adherence with Title VI requirements.

Consultant Services

- ▶ The Policy and Personnel Committee of the Regional Planning Commission, in consultation with the Executive Director, is responsible for setting policy and establishing procedures for consultant selection, negotiation, and administration of consultant contracts for the Commission.
- ▶ The Title VI Coordinator shall monitor DBE program requirements.
- ▶ The Title VI Coordinator shall ensure that all federally funded consultant contracts administered by the Commission have the appropriate Title VI provisions included.
- ▶ The Title VI Coordinator shall review directives and procedures to ensure Title VI compliance.
- ▶ The Title VI Coordinator shall maintain necessary data and documentation required for completion of the department's Title VI Update Annual Report.

Public Participation

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

The RPC has an official **Public Involvement Plan** which is easily available on RPC's website or in person at the RPC office.

The plan includes:

- ▶ Public Involvement Policy
- ▶ Public Involvement Planning Goals
- ▶ Public Outreach Activities
- ▶ Public Meetings Procedures
- ▶ Limited English Proficiency (LEP) Guidelines
- ▶ Americans with Disabilities Act (ADA) Procedures
- ▶ Environmental Justice Policy

RPC has also developed a user friendly **Citizen's Guide To Transportation Planning** which is passed out at all public meetings and made available on RPC's website and in person at the RPC office. The guide provides a brief explanation of transportation planning and what role RPC plays in that process.

Environmental Justice

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on the minority and low-income population groups. Within the context of regional transportation planning, environmental justice considers the relative distribution of cost and benefits from transportation investment strategies and policies among different segments of society.

When RPC adopts new planning documents, or substantively amends existing documents, the agency is required to comply with federal environmental justice requirements. When this occurs, a systematic process is used to study and evaluate all necessary environmental aspects of the proposed action(s). Depending on the scope, complexity, and impacts of the project, the agency's Title VI Coordinator oversees the process, and ensures all federal and state requirements are met, and that the public has been invited to participate.

Consultant Contracts

The Regional Planning Commission is responsible for selection, negotiation, and administration of its consultant contracts. RPC operates under its internal contract procedures and all relevant federal and state laws.

Contract Procedures

Title VI text is included in all RPC Request for Proposals (RFP) and contracts.

Disadvantaged Business Enterprise (DBE) Program

RPC includes DBE text in all RFPs and contracts with consultants and notes its DBE policy on the RPC website. RPC provides a list of all LADOTD's certified DBEs in its DBE Policy and Procedures which can be accessed on RPC's website.

Consultant Reviews

The RPC is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's consultant contracts process. All consultants will be made aware that as subrecipients of federal funds they are required to adhere to our agency's Title VI Plan, DBE Policy and Procedures, and LEP Plan. To ensure their compliance, the RPC will issue an Annual Title VI Review for Subrecipients and Consultants once a year to all subrecipients who have been awarded RPC contracts within that year.

In conducting reviews of subrecipients, if a subrecipient is found to not be in compliance with our Title VI policies, the Title VI coordinator will work with the subrecipient to resolve the identified issues. RPC will seek the cooperation of the subrecipient in correcting deficiencies, and will provide the technical assistance and guidance needed for the subrecipient to comply voluntarily.

If a consultant is found to not be in compliance, a follow-up review will be conducted within 180 days of the initial review to ensure the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If subrecipients refuse to comply then RPC will determine further action to be taken.

A copy of the **Annual Title VI Review for Subrecipients and Consultants** can be found at the end of this document.

Questions

For any questions regarding the RPC's Title VI Plan or any related policies and procedures please contact RPC's Title VI Coordinator at 504-483-8535 or visit our website at www.norpc.org.

**REGIONAL PLANNING COMMISSION
JEFFERSON, ORLEANS, PLAQUEMINES, ST. BERNARD AND ST. TAMMANY PARISHES**

Title VI Assurances

The Regional Planning Commission for Jefferson, Orleans, Plaquemines, St Bernard and St. Tammany Parishes (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d-42 USC 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), , and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by, Subsection 21. 7 (a) (I) of the Regulations.

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

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

The Regional Planning Commission in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252,42 USC 2000d-d4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders and proposers that it will affirmatively ensure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids, proposals or statements of qualification in response to this invitation and will not be discriminated against on the grounds of race, color, sex, or national origin in consideration for an award.

3. That the Recipient shall insert the necessary clauses of this Assurance in every contract subject to the Act and the Regulations.

4. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
5. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom s/he delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
6. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign the Assurance on behalf of the Recipient.

Walter R. Brooks

Walter R. Brooks
Executive Director
Regional Planning Commission

Date *6/21/10*

Title VI Methodology for Identification of Target Populations (Demographics) & Spatial Concentrations of Targeted Populations

RPC utilizes the latest U.S. Census data, American Community Survey data, and Louisiana Department of Social Services data to identify target populations. To form the most accurate profile of these populations it is in RPC's best interest to use the smallest geographic unit available for which information is obtainable for all relevant groups. The smallest geographic area that the Census Bureau calculates the appropriate information on each relevant group is block group level, which the RPC utilizes in all map products and planning efforts. The Louisiana Department of Social Services Data is available by point data and then is agglomerated into block level data for privacy issues. American Community Survey data is available for the New Orleans Metropolitan Region.

RPC has identified seven relevant groups for Title VI analysis as described below:

- ▶ Low Income
- ▶ Federal Assistance Recipients
- ▶ Minority
- ▶ Elderly
- ▶ Limited English Proficiency (LEP) or English spoken as a second language
- ▶ Disabled Populations
- ▶ Zero Car Households

Once the RPC has identified target populations for Title VI consideration, the next step is to produce maps that show their distribution throughout the area and how they relate to RPC studies, TIP projects, and projects let to construction. These maps are for RPC internal use and are not made available for public use. Following is our methodology for producing maps products.

RPC Choosing Demographic Data

ESRI demographic data and GIS software are utilized by the US Military, US Federal Government, the State of Louisiana, and most parishes encompassing the Regional Planning Commission. ESRI deployed a team to the FEMA headquarters in Baton Rouge following Hurricanes Katrina and Rita and worked first hand with the datasets produced by FEMA and the Red Cross. The Regional Planning Commission employs ESRI software as well as other software for cartography and spatial analysis purposes. The RPC has had experience working with ESRI and their products for over a decade and this was a contributing factor in choosing the ESRI data.

Background Information for Title VI Map Products

Estimating Race Begins with a Population Estimate – Population Data Background

- Originator of population data used for Household Population= ESRI, Inc. (Environmental Systems Research institute, Inc.) founded in 1969 – the leading GIS software producer
- Data from 2008
- Spatial Distribution by Census block
- Methodology from ESRI: Population forecasts are prepared initially for counties and block groups. From the block group database, forecasts are then retrieved for census tracts and census blocks. “Changes in the total population is a function of changes in household

population and the population in group quarters which are subject to different trends” (ESRI Demographic Update Methodology: 2008/2013).

- Therefore, household population and group quarters population projections are separated. We are using both of these data sets for the race information.

Group Quarters Population

The group quarters population represents the Census 2000 count of group quarters, as well as the Census Bureau’s Count Question Resolution (CQR) revisions and updates gathered from a variety of federal, state, and local sources.

Household Population Background Information

To update household population, ESRI begins the changing of numbers at the county level using several sources of data. ESRI employs a time series of the U.S. Census Bureau Population Division that utilizes county estimates through 2006. Accuracy is improved by employing a time series of building permits and housing starts, and residential postal delivery counts. “Local data sources that tested well against Census 2000 are also reviewed” (ESRI Demographic Update Methodology: 2008/2013).

At the block group level, “ESRI models the change in households from three primary sources—the **InfoBase database** from Axiom Corporation, residential delivery statistics from the **U.S. Postal Service**, and residential construction data **from Hanley Wood Market Intelligence**—in addition to several ancillary sources” (ESRI Demographic Update Methodology: 2008/2013). “Discrepant trends are checked extensively against independent sources” and all tests are benchmarked against Census 2000 data (ESRI Demographic Update Methodology: 2008/2013). “Totals for block groups are controlled to the county totals” (*more information is available to track population change by county than by household*) (ESRI Demographic Update Methodology: 2008/2013).

Race Distribution From Population Estimate

Methodology: ESRI’s race database is supplemented with a **diversity index** which summarizes racial and ethnic diversity (ESRI Demographic Update Methodology: 2008/2013).

- “The index shows the likelihood that two persons, chosen at random from the same area, belong to different races or ethnic groups. The index ranges from 0 (no diversity) to 100 (complete diversity). The U.S. diversity index currently stands at 60, an increase of 1 percent annually since 2000” (ESRI Demographic Update Methodology: 2008/2013).
- “Historical trends in race and Hispanic origin play an important role in the analysis and forecasting process”, as do the American Community Survey 2006 race and Hispanic origin data by county (ESRI Demographic Update Methodology: 2008/2013).
- “Survey data is analyzed in conjunction with ESRI’s estimate of change from 1990 to 2000 by race and Hispanic origin to establish county population by race and Hispanic origin. Forecasts by block groups combine local changes in the distributions by race and projected change for counties. The last step controls block group distributions to county projections” (ESRI Demographic Update Methodology: 2008/2013).

Hurricane's Effect on Population

- These data were built on ESRI's 2005 demographic estimates following Hurricanes Katrina and Rita, and were then supplemented with Red Cross housing unit damage data from fieldwork and FEMA damage polygons compiled from fieldwork and aerial photographs of damaged areas. FEMA applications for assistance, and the USPS' National Change of Address (NCOA) file were used for estimating outmigration. ESRI methodology assumed that most communities would recover by 2011, except for Orleans and St. Bernard Parishes.

Median Income

- Median Income Data from ESRI 2008 which is based upon Census 2000, the annual Current Population Survey (CPS) & American Community Survey (ACS) 2005-2007 personal and disposable income tax data & the Census of Employment and Wages from the Bureau of Labor Statistics employment and wage data
- Originator of income data used for Household Population= ESRI, Inc. (Environmental Systems Research institute, Inc.) founded in 1969 – the leading GIS software producer
- Data from 2008
- Spatial Distribution by Census tract
- Differences in survey methodology between ESRI and Census create differences between the decennial census and the Census Current Population Survey (CPS)
- ESRI focuses upon the rates of change to capture current trends and seasonal patterns to produce accurate civilian labor force forecasts. “ESRI's 2008 estimates represent income received in calendar year 2007” (ESRI Demographic Update Methodology: 2008/2013).
- “ESRI's projection base is the income that was reported in Census 2000. Federal statistical surveys are the principal sources of labor force trends” (ESRI Demographic Update Methodology: 2008/2013).
- Several federal data sources include the Census Current Population Survey (CPS), the American Community Survey (ACS), personal and per capita after-tax (disposable) income data, and the Census of Employment and Wages from the Bureau of Labor Statistics. A time series data from household surveys was used to track income and establish a base trend line.
- “Current trends in wage inflation and other economic shocks are evaluated as well. State income distributions are forecasted first, then counties, tracts, and block groups. Differentiators of income growth such as local variation, changes in income inequality, and urbanity are designed in the forecast. Household characteristics at the block group geography are correlated with changes in income derived from national surveys. Median income is calculated from the distributions using linear interpolation.” (ESRI Demographic Update Methodology: 2008/2013).

Source:

ESRI Demographic Update Methodology: 2008/2013. An ESRI White Paper, July 2008.

Title VI Public Notice

The paragraph below is to be inserted in all significant publications that are distributed to the public, such as future versions and updates of the *Metropolitan Transportation Plan*; and *Transportation Improvement Program* for the RPC region. The text will remain permanently on the agency's website, www.norpc.org, and available to all employees. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

Title VI Notice: The Regional Planning Commission (RPC) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in all programs and activities. RPC operates without regard to race, color, national origin, income, gender, age, and disability. Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the Louisiana Department of Transportation (LaDOTD). LaDOTD Title VI Program Manager may be reached via phone at 225-379-1361. A complaint must be filed no later than 180 days after the date of the alleged discrimination.

RPC meetings are conducted in accessible locations and materials can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact the Title VI Coordinator at RPC at 504-483-8535 or nrichard@norpc.org. If you wish to attend a RPC function and require special accommodations, please give RPC one week's notice in advance.

The following shortened version of the above paragraph can be used in publications where space or cost is an issue as in classified newspaper announcements.

RPC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Complaint Form, see www.norpc.org or call our Title VI Coordinator at 504-483-8535.

Limited English Proficiency

Limited English Proficiency Policy

The Regional Planning Commission (RPC) follows Executive Order 13166 in identifying and engaging Limited English Proficiency (LEP) populations to ensure their involvement and knowledge of transportation planning and projects in and around their communities. A LEP person is defined as one who does not speak English as his or her primary language and has a limited ability to read, write, or understand English.

RPC's policy for engaging individuals with Limited English Proficiency is to provide translation services to individuals who request them, if reasonable accommodations can be made. In addition, the RPC proactively identifies communities with high concentrations of LEP persons and employs tactics and strategies to effectively engage them in the planning process. The RPC trains staff to recognize individuals in community meetings and forums who may show difficulty or inability to read or write English, and to assist them accordingly.

Executive Order 13166

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

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

Four Factor Analysis

The RPC follows the U.S. Department of Justice's guidelines using the "four-factor analysis" process to determine the number and proportion of LEP individuals in the region. This information aids the RPC in planning how to cost effectively provide information services to LEP individuals. FHWA guidelines offer a safe harbor of 5% of the effected population or 1,000 people in the effected neighborhood. A "safe harbor," in the context of this guidance, means that the recipient has undertaken efforts to comply with the needed translation of vital written materials. If a recipient conducts the four-factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the recipient provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance.

The "four-factor analysis" process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact

with the program, the importance of the program to people's lives, and the resources available to provide translation services. The four factor analysis is as follows:

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

The RPC reviewed 2008 American Community Survey data for the New Orleans Metropolitan area, which is the most accurate data available, and found that 90% of the population reported English as a primary language. Of the remaining 10% of the population, 5.23% reported Spanish as a primary language (55,501 people) and 1.51% reported Vietnamese (16,078 people). The remaining 3.26% reported French, Chinese, German, Korean and other languages as their primary language. (see table in appendix)

RPC has determined that Spanish and Vietnamese speaking individuals make up the majority of the region's LEP population. Although Vietnamese is spoken by less than 5% of the population their density exceeds 1,000 people per effected neighborhood. Consequently, RPC is cognizant of the need to translate documents or work with interpreters as necessary when working with members of these communities.

2. The frequency with which LEP persons come into contact with RPC programs, activities or services.

To date, the RPC has had no request for interpreters and no requests for translated RPC documents. Staff has had very limited contact with LEP persons; however the RPC has been proactive in identifying LEP communities and translating important documents. Based on the percentage and number of LEP individuals who reported Spanish or Vietnamese as a primary language, the RPC has made both its Title VI Plan and Transportation Improvement Program available in Spanish and Vietnamese and posted these documents on our website, and has also translated its Enforcement for Pedestrian and Bicycle Safety into Spanish and distributed it at community meetings and to local law enforcement.

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

The RPC has identified a significant population of Vietnamese residents in New Orleans East. The RPC maintains communication with leaders of the Vietnamese community, particularly Mary Queen of Vietnam Community Development Center, to gain the input of LEP individuals. The Hispanic community is larger, therefore less concentrated than the Vietnamese community, but RPC has established a relationship with LatiNOLA, a Hispanic civic group, to help identify the community's LEP needs. Through these channels of communication the RPC is able to stay informed about these community's needs and has a means of informing them of upcoming RPC projects.

The RPC has also taken initiative and mapped general locations of these individuals. The RPC will take appropriate action such as hiring an oral translator and translating all necessary documents whenever significant populations of LEP persons are impacted. In addition, the RPC is working with Public Outreach Liaisons to garner input from this target population in the transportation planning process.

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

The RPC has limited resources to pursue written and oral translation services. All translation service needs will be addressed on a case by case basis and services will be provided wherever

deemed necessary. The RPC is open to all translation suggestions and is committed to providing translation needs wherever feasible when requested. RPC maintains an active list of interpreters should the need arise.

Limited English Proficiency Plan

How The RPC Identifies LEP Persons Who May Need Assistance

- ❖ Examine requests for language assistance from past meetings and events to anticipate the potential need for assistance at upcoming meetings.
- ❖ A staff member will be placed at the entrance to public meetings to greet and briefly engage with attendees during sign-in to informally gauge each attendee's ability to write, speak and understand English.
- ❖ Staff will be trained to identify non-verbal clues that a person may have Limited English Proficiency, such as reluctance to fill out surveys or sign-in at public meetings.
- ❖ Examine Census Bureau population numbers of those who report a primary language other than English and compare that to Census block data and map communities accordingly to determine high concentrations of LEP populations.
- ❖ Maintain a stream of communication with LEP community leaders such as Mary Queen of Vietnam Community Development Center and LatiNOLA, as well as seek to establish new relationships.

Implementing Language Assistance Measures

- ❖ Based on Census Bureau data, RPC will evaluate all documents, and translate those deemed most widely accessed, into any language other than English that is spoken by more than 5% of the population or by more than 1,000 people per neighborhood.
- ❖ The RPC has already translated its Transportation Improvement Program and Title VI Plan into Vietnamese and Spanish, as well as translated its Enforcement for Pedestrian and Bicycle Safety into Spanish. The translated TIP and Title VI Plan have been made available on RPC's website and the Enforcement for Pedestrian and Bicycle Safety has been distributed at community meetings and to local police departments.
- ❖ The RPC will continue to search out venues that have been found to be frequented by LEP individuals and make information available at these locations in the most appropriate format and language.
- ❖ Utilizing trusted leaders and community organizations in the Hispanic and Vietnamese communities, such as Mary Queen of Vietnam Community Development Center, to continually identify the needs of LEP individuals and provide necessary oral and written translations.
- ❖ The RPC takes a proactive approach in identifying LEP communities and will continue to host meetings in close proximity to these communities to distribute all necessary translated materials and documents.

- ❖ The RPC remains committed to providing oral and written translation services upon request. RPC maintains an active list of interpreters and translators to accommodate LEP individuals.
- ❖ All projects falling within a RPC LEP area are reviewed on a case by case basis. If the nature and importance of the program, activity, and service is deemed significant then the RPC and all entities conducting business on our behalf will follow these same LEP guidelines.

Staff Training

All RPC staff will be provided with the LEP plan and will be educated on procedures and services available. All training topics are listed below:

- ❖ Understanding the Title VI LEP responsibilities
- ❖ What language assistance services RPC offers
- ❖ How to identify LEP individuals in public meetings
- ❖ How to access an interpreter
- ❖ Documentation of language assistance requests
- ❖ How to handle a complaint

Monitoring and Updating the LEP Plan

This plan is dynamic and may be updated as more effective means of communication are developed. At a minimum, RPC follows the Title VI Program update schedule for the LEP plan. The RPC will update its LEP Plan as 2010 Census data becomes available.

Dissemination of the RPC Limited English Proficiency Plan

The RPC will post the LEP Plan on its website at www.norpc.org. The LEP Plan can also be found in RPC's Public Involvement Plan.

Any person, including social service, non-profit, law enforcement agencies and other community members with internet access will be able to access the plan. For those without personal internet service, all parish libraries offer free internet access. A hard copy of the LEP Plan will be provided to any person or agency upon request. Persons with Limited English Proficiency may also obtain translations of this plan upon request.

Any questions or comments regarding this plan should be directed to the RPC Title VI Coordinator.

Requesting Translation Services

Any individuals who wish to request oral or written translation services can do so through RPC's website at www.norpc.org or by contacting RPC's Title VI Coordinator:

Nik Richard
Title VI Coordinator
504-483-8535
nrichard@norpc.org

Language Spoken At Home For The Population 5 Years Of Age And Over 2008 American Community Survey

	New Orleans-Metairie-Kenner, LA Metro Area	
	Estimate	Margin of Error
Total:	1,060,746	+/-822
Speak only English	959,366	+/-5,645
Spanish or Spanish Creole	55,501	+/-3,629
French (including Patois, Creole, Cajun)	12,632	+/-2,181
German or other West Germanic languages	1,493	+/-710
Slavic languages	1,947	+/-1,193
Other Indo-European languages	3,907	+/-1,478
Korean	649	+/-467
Chinese	2,561	+/-1,557
Vietnamese	16,076	+/-2,396
Tagalog	815	+/-587
Other Asian or Pacific Island languages	2,525	+/-1,128
Other and unspecified languages	3,274	+/-1,965

Source: U.S. Census Bureau, 2008 American Community Survey

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see [Accuracy of the Data](#)). The effect of nonsampling error is not represented in these tables.

Americans with Disability Act (ADA) Notices

ADA Policy

Title II of the Americans with Disabilities Act of 1990 prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. In accordance with these requirements the Regional Planning Commission (RPC) will not discriminate against qualified individuals with disabilities on the basis of disability in RPC's services, programs or activities.

RPC's Commitment

- ❖ RPC will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend all RPC public meetings.
- ❖ RPC will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in RPC's public meetings.
- ❖ RPC will post the following ADA notice at the bottom of all RPC meeting notices:
ADA NOTICE: For special accommodations for this meeting, please contact our ADA Coordinator by telephone (504-483-8528), at least one week in advance.
- ❖ The RPC is housed at the Regional Transportation Management Center (RTMC) located at 10 Veterans Memorial Blvd. in New Orleans, Louisiana. The RTMC building is handicapped accessible.
- ❖ RPC will include language in all of our contracts to ensure nondiscrimination of all persons with disability.

The ADA does not require the RPC to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. RPC will strive to provide its services, programs and activities in the most accessible manner feasible.

Notification that a RPC meeting is not accessible to persons with disabilities should be directed to:

Jeffrey W. Roesel, AICP
Director of Planning /ADA Coordinator
504-483-8528
jroesel@norpc.org

Environmental Justice

Environmental Justice Policy

It is the policy of the Regional Planning Commission to ensure that all of its programs, policies, and other activities do not have disproportionate adverse effects on minority and low income populations. The RPC identifies minority communities through the use of Census data. Low income communities are identified with Louisiana State Department of Social Services data. RPC maps Census and Social Services data to more accurately locate concentrations of target populations. The RPC takes a proactive approach to engage these communities and ensures their full and fair participation in the transportation decision-making process.

Executive Order 12898

The Regional Planning Commission follows Executive Order (EO) 12898 which outlines;

Each Federal agency must make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health, environmental, economic and social effects of its programs, policies, and activities on minority and low-income populations, particularly when such analysis is required by NEPA. The EO emphasizes the importance of NEPA's public participation process, directing that each Federal agency shall provide opportunities for community input in the NEPA process. Agencies are further directed to identify potential effects and mitigation measures in consultation with affected communities.

The EO requires agencies to work to ensure effective public participation and access to information. Thus within its NEPA process and through other appropriate mechanisms, each federal agency should translate crucial public documents, notices and hearings, relating to human health or the environment for limited English speaking populations when it is practical and appropriate.¹

Goals and Objectives

The RPC is committed to the following goals and objectives for achieving environmental justice:

- ❖ Protect environmental quality and human health in all conditions
- ❖ Avoid disproportionate adverse impacts on minority and low income populations
- ❖ Enhance the public involvement process and strengthen relationships with community organizations
- ❖ Provide minority and low income populations with the opportunity to learn more about the transportation planning process
- ❖ Improve the quality of transportation in their lives

¹ Taken directly from <http://www.fema.gov/plan/ehp/ehplaws/ejeo.shtm>

- ❖ Make sure all projects go through an Environmental and Title VI checklist to insure environmental issues are considered and appropriate actions are followed
- ❖ Promote and protect community members' rights to participate meaningfully in decisions that may affect them
- ❖ Make the process of filing environmental justice complaints easy through readily available forms on the Regional Planning Commission website and in the RPC office, and by designating an identified RPC staff member as the Title VI Coordinator that citizens can easily speak with.

Filing and Environmental Justice Complaint

Any individual or community that wishes to file an environmental justice complaint or discuss concerns about the RPC's transportation planning process may contact:

Louisiana Department of Transportation
Title VI Programs Manager
225-379-1361

**Regional Planning Commission for
Jefferson, Orleans, Plaquemines, St. Bernard, and St. Tammany Parishes
Disadvantaged Business Enterprise Program
In Compliance with 49 CFR PART 26**

DBE POLICY STATEMENT

Section 26.1, 26.23

Objectives/Policy Statement

The Regional Planning Commission for Jefferson, Orleans, Plaquemines, St. Bernard, and St. Tammany Parishes (RPC) has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. RPC has received Federal financial assistance from the Department of Transportation, and as a condition of receiving this assistance, has signed assurances that it will comply with 49 CFR Part 26.

It is the policy of the Regional Planning Commission to ensure that DBEs as defined in Part 26, have an equal opportunity to receive and participate in DOT-assisted contracts. It is also the policy of RPC:

1. To ensure nondiscrimination in the award and administration of DOT-assisted contracts;
2. To create a level playing field on which DBEs can compete fairly for DOT-assisted contracts;
3. To ensure that the DBE Program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as DBEs;
5. To help remove barriers to the participation of DBEs in DOT assisted contracts;
6. To assist the development of firms that can compete successfully in the market place outside the DBE Program.

Nikolaus Richard has been delegated as the DBE Liaison Officer. In that capacity, he is responsible for implementing all aspects of the DBE program. Implementation of the DBE program is accorded the same priority as compliance with all other legal obligations incurred by the Regional Planning Commission in its financial assistance agreements with the Department of Transportation.

The Regional Planning Commission has disseminated this policy statement to the members of the Commission and all the components of the organization. RPC has distributed this statement to DBE and non-DBE business communities that perform work for RPC on DOT-assisted contracts. All consultants who have performed work for RPC in the past five years were mailed a copy of the Policy Statement. In addition, all qualified DBE firms on a list maintained by the Louisiana Department of Transportation and Development (LaDOTD) under its Unified Certification Program that perform Architectural Engineering (C04), Management (C10), Planning (C11), Transportation Planning (C14), Research Surveys (C15), Supportive Services (C17), Marketing (C36), and Public Relations (C47) were mailed a copy of the Policy Statement.

Walter R. Brooks

Walter R. Brooks, Executive Director

Date

6/21/10

Louisiana Department of Transportation

Title VI Discrimination Complaint Form

Name	Phone	Name of Person(s) Who Discriminated Against you.	
Address (Street No., P.O. Box, Etc.)		Location and Position of Person (If known)	
City, State, Zip		City, State, Zip	
Discrimination Because Of: <input type="checkbox"/> Race/Color <input type="checkbox"/> Sex <input type="checkbox"/> Disability <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Income Status or Retaliation			Date of Alleged Incident
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved and witnessed the discrimination. Be sure to include how other persons were treated differently than you. Attach any written material pertaining to your case.			
Signature			Date

Please return this form to: **Compliance Programs Officer**
 P.O. Box 94245
 Baton Rouge, LA 70804

Telephone Number : (225) 379-1361
Fax Number : (225) 379-1865



New Orleans Regional Planning Commission
For Jefferson, Orleans, St. Bernard, St. Tammany and Plaquemines Parishes

As a subrecipient of federal funds you are aware that your agency is required to comply with all federal regulations regarding Title VI laws. In accordance with Title VI of the Civil Rights Act of 1967 and 49 CFR 21, this is the **Annual Title VI Review for Subrecipients and Consultants** to be issued once a year to all agencies awarded contracts by the Regional Planning Commission within the past year. Please provide yes/no answers with a brief explanation.

Name of Subrecipient/Consultant: _____

Date of Contract Awarded: _____

Contract Number: _____

Questionnaire

I. Complaint Process

1. Has your firm made itself aware of all federal Title VI rules and regulations as it applies to all subrecipients of federal funds? This information is easily accessible to all consultants via the RPC offices and/or website.
2. Does your firm have a formal Title VI policy?
3. Does your firm have a formal Title VI complaint process? If so provide a brief explanation of that process.
4. Has your firm received any Title VI or Environmental Justice complaints within the last year? If so what were the issues involved and what were the outcomes?
5. Has your firm processed any Title VI lawsuits within the past year? If so what were the issues involved and what were the outcomes?
6. Has any member of your firm had any formal Title VI training sponsored by LaDOTD, FHWA, or any other agency in the past year? If so please explain.

II. Public Involvement – Meetings and Hearings

7. Does your firm hold public meetings in areas that are easily accessible to all members of the community and comply with the Regional Planning Commission's **Americans with Disabilities Act (ADA) Plan**? If not, are there plans to do so in the future?

8. Has your firm made itself aware of Regional Planning Commission's **Limited English Proficiency (LEP) Plan**? This information is easily accessible to all consultants via the RPC offices and/or website.
9. Has your firm had any public request for translations services written or oral? If so what were the outcomes of these request?

III. Advertisements and Procurements of Contracts

10. Have any subcontracts been awarded within the past year that utilizes federal funds?
11. If subcontracts are awarded are all Title VI assurances and provisions included in advertisements and contracts?
12. Has your firm made itself aware of Regional Planning Commission's **DBE Policy and Program**? This information is easily accessible to all staff members via the RPC office and/or website.
13. Is the awarding of any subcontracts non-discriminatory and does it comply with RPC's DBE Policy?

Certifying Officer

Date

Upon receiving this questionnaire you have 30 days to provide all necessary information and mail to: **Regional Planning Commission, 10 Veterans Memorial Blvd. New Orleans, LA 70124**
Or electronically to nrichard@norpc.org

Regional Planning Commission

10 Veterans Memorial Boulevard
New Orleans, Louisiana 70124

504-483-8500