

SFY25-28

Title VI Policy and Program



Regional Planning Commission
for Jefferson, Orleans, Plaquemines,
St. Bernard, St. Charles, St. John, St.
Tammany and Tangipahoa Parishes

TITLE VI PROGRAM

Updated
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Prepared by the
Regional Planning Commission
Staff

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Regional Planning Commission

Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John, St. Tammany and
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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, St. Charles, St. John the Baptist, St. Tammany, and Tangipahoa Parishes (referred to throughout as 'RPC' and 'Commission') is the recipient of federal-aid highway funds authorized under the Infrastructure Investment and Jobs Act, [Pub. L. 117-58](#). As such, The Regional Planning Commission is subject to the requirements of Title VI and the information reporting requirements established by the U.S. Department of Transportation (49 CFR, Part 21) via Federal Highway Administration (FHWA) (23 CFR Part 200, and as subrecipient to LADOTD), and the Federal Transit Administration (FTA) (FTA Circular C 4702.1B 10-01-12), and when applicable the Environmental Protection Agency (EPA) to evaluate the level of compliance.

For reporting and compliance purposes it is noted that the Regional Planning Commission as a Metropolitan Planning Organization (MPO) is not a public transit provider and owns no public transit facilities.

Figure 1 on the next page shows an overview of the RPC jurisdictional area and planning area.

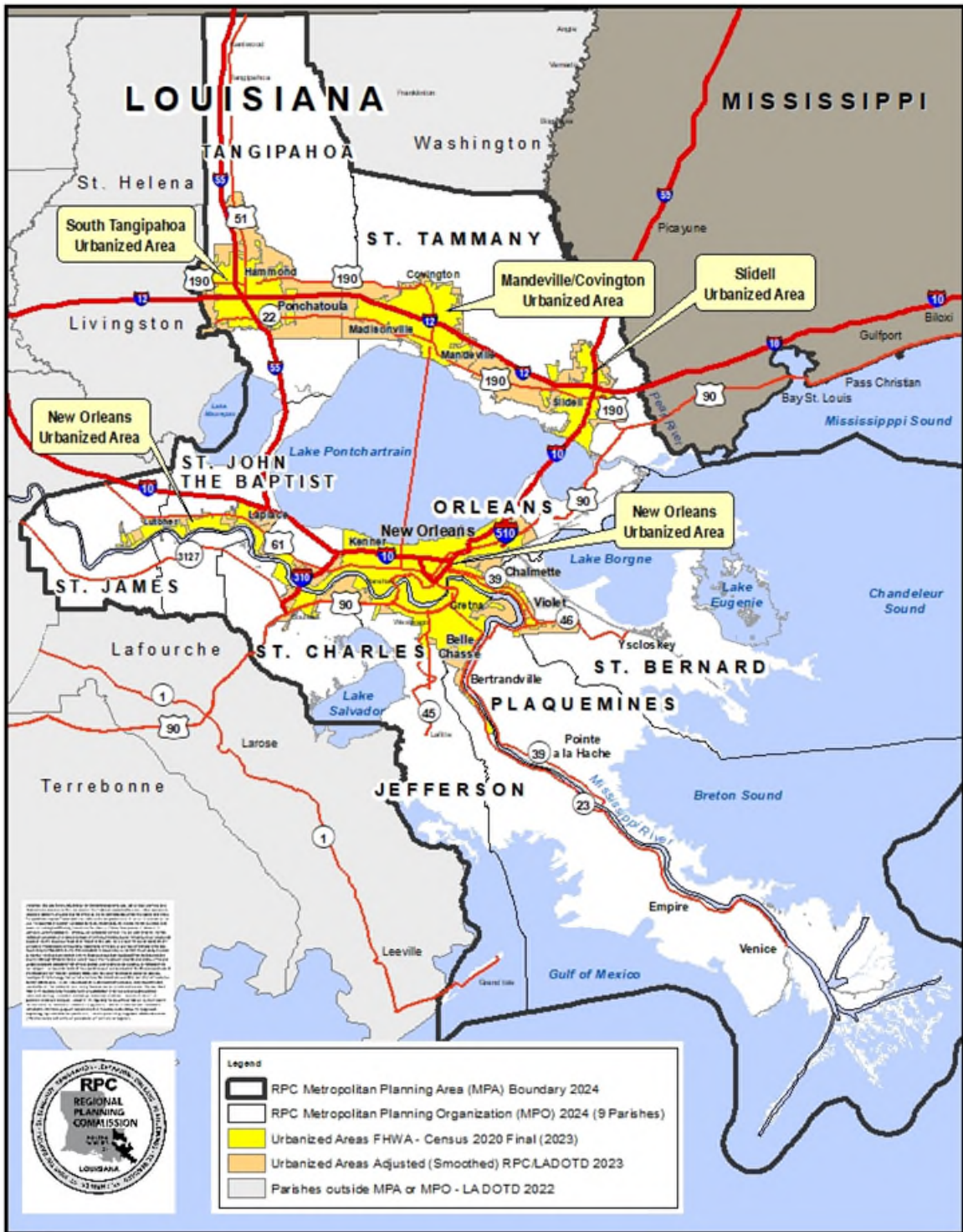


Figure 1

Title VI Plan Policy Statement

The New Orleans 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.


Jeffrey Roesel, Executive Director

Date

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. (DOT 5610.2B)

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 <https://www.justice.gov/crt/book/file/1388766/dl?inline>

Title VI Delegation Chart

U.S. Department of Justice
Civil Rights Division
Federal Coordination and Compliance Section,

Federal Highway Administration
Office of Civil Rights

Federal Transit Administration
Office of Civil Rights

State of Louisiana – Department of Transportation &
Development
Joe Donahue, Secretary

State of Louisiana – Department of Transportation &
Development
Division of Administration – Compliance Programs
Cynthia H Douglas
Title VI/ADA Compliance Manager

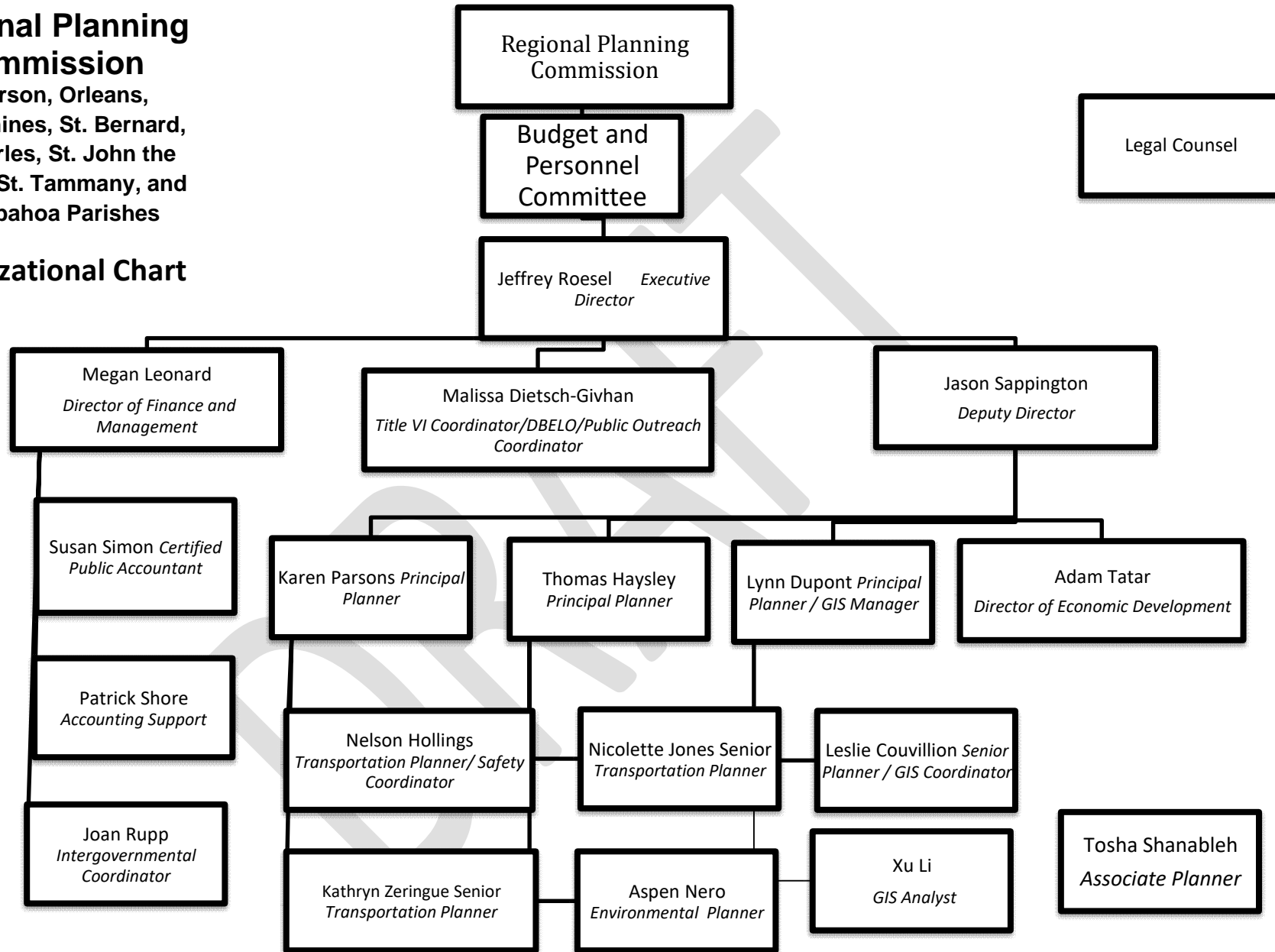
Regional Planning Commission
Jeffrey Roesel, Executive Director

for Regional Planning Commission
Malissa Dietsch-Givhan
Title VI Coordinator/DBE Liason

Regional Planning Commission

Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, and Tangipahoa Parishes

Organizational Chart



Organization Structure

Agency Description

The New Orleans Regional Planning Commission (NORPC) serves as the regional planning agency for the Greater New Orleans eight (8) parish region providing a venue for collaboration between local, state, and federal agencies. The agency is comprised of two governing bodies and support staff as described below.

The Regional Planning Commission (RPC) is a board of local elected officials and citizen members from Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, and Tangipahoa Parishes. The group deliberates and collaborates on matters of regional importance, including economic development, environmental planning, and transportation.

The Transportation Policy Committee (TPC) of the RPC serves as Metropolitan Planning Organization for the Metropolitan Planning Area (MPA) consisting of four urbanized areas: New Orleans, Mandeville-Covington, Slidell, and South Tangipahoa as designated by the Federal Highway Administration(citation). The TPC is the decision-making body regarding Federal transportation planning and programming for the MPO. The TPC is made up of the membership of the RPC, plus representatives from the region's major transportation modal interests and other elected officials.

As the MPO for the region, the Transportation Policy Committee within the RPC is the federally mandated transportation-policy making organization for the region pursuant to **23 USC 134** responsible for review and adoption of the Title VI Program as well as all implementation documents.

Additionally, this policy is applicable to all other programs administered by the RPC.

For analysis purposes St. James Parish is included in all assessments due to MPA boundary updates.

Transportation Policy Committee

The Transportation Policy Committee is designated under 23 USC 134 and 49 USC 5303 as the Metropolitan Planning Organization policy board that implements Federal transportation planning process and is the final decision-making body for transportation policy and planning issues for all qualifying urbanized areas within its geographic jurisdiction.

The Transportation Policy Committee includes all the members of the Regional Planning Commission, as well as representatives from the region's major transportation modes and other elected officials.

Advisory Councils and Committees

RPC has two non-elected transportation advisory councils and committees. These councils and committees, and a description of their duties are as follows:

Technical Advisory Group

Technical Advisory Group (TAG) is a regional group of stakeholders, comprised of public works directors, planning directors, transit operators, as well as representatives from the port, bridges, airport, and railroads in the Greater New Orleans area. Other participating agencies include the U.S. Department of Housing and Urban Development, Federal Highway Administration, National Safety Council, and Federal Transit Administration. The RPC has also chosen to incorporate representatives of five select non-profit organizations with a transportation interest into the TAG to provide input into the decision-making process. The TAG meets on a quarterly basis to review various planning products, such as the UPWP and MTP; to advise RPC staff on transportation and land use issues, and to discuss projects of regional significance, and to share best practices with area parishes.

Coordinated Human Services Council

The primary roles and responsibilities of the Coordinated Council are to update, maintain, and determine how to best implement the Coordinated Public Transit-Human Services Transportation Plan by providing a venue for stakeholder interaction, sharing of human services transportation issues, problems, and developing solutions for further action. The Council meets quarterly.

Staff and Responsibilities

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, LEP Coordinator, and is responsible for all ADA programs. The Title VI Coordinator also serves as the DBE Liaison officer and DBE coordinator for subcontracting alongside the Intergovernmental 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.

Program Administration – General

The Title VI Coordinator, 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.

Complaint Procedures

Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the Louisiana Department of Transportation's (LADOTD) Compliance Programs Office (CPO). A formal complaint must be filed within 180 calendar days of the alleged occurrence.

Upon receipt of the complaint, the CPO will determine its jurisdiction, acceptability, need for additional information, and investigative merit of the complaint. In cases where the complaint is against one of LADOTD's sub recipients of federal highway funds, the Department will assume the jurisdiction and will investigate and adjudicate the case.

Once the CPO decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will then be logged in the CPO's records identifying the basis of the complaint; race, color, national origin, gender, age, LEP, or disability/handicap.

In cases where LADOTD assumes the investigation of the complaint, the CPO will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days to furnish the CPO his/her response to the allegations.

Within 50 calendar days of receipt of the complaint, the LADOTD's investigator will prepare an investigative report for the Compliance Programs Director. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition. *This can be the Program Area Title VI Liaison or LADOTD's Title VI Program Unit.

Once LADOTD's investigative report becomes final, the parties will be properly notified of the outcome and appeal rights.

LADOTD's investigative report and a copy of the complaint will be forwarded to FHWA, within 60 calendar days of the receipt of the complaint.

If the complainant is not satisfied with the results of the investigation, s/he shall be advised of their rights to appeal LADOTD's determination to the FHWA Louisiana Regional Office, USDOT or USDOJ. Appeals must be filed within 180 days after LADOTD's final resolution. Unless new facts not previously considered come to light,

reconsideration of LADOTD's determination will not be available.

LADOTD will serve as appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by a LADOTD sub recipient. LADOTD will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

Title VI complaint forms are made available at the Regional Transportation Management Center and on the www.norpc.org website. A copy of the complaint form can be found at the end of this document.

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 and GIS manager. The data gathering process will be reviewed annually to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

All data collected for purposes of Title VI program administration and planning can be found in appendix(X). Title VI maps and other demographic data can be found on the agency website at norpc.org/

Title VI Program Reviews

The Commission's Title VI Program reviews will be performed by the 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 coordinator will coordinate efforts to ensure equal participation in all programs and activities at all levels. The 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.

All subrecipients will be required to submit a Title VI Program for approval to the RPC on award of funds and will be required to resubmit their Title VI Program every three years, or in the event of any changes to their Title VI Program.

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.

Training Program

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

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 coordinator will be responsible for the coordination and preparation of the report.

Title VI Program Update

The Title VI Program will be reviewed and updated on a 3-year cycle. An updated version of the Title VI Program will be submitted to the Federal Transit Administration (FTA) via TRAMS every 3 years for approval, or when there are any significant changes made to the program. A copy of the program will also be sent to the Louisiana Department of Transportation and Development (LADOTD) for their review and approval on the same 3-year cycle.

Public Dissemination

The coordinator will disseminate Title VI Program information to Commission employees, subrecipient, 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 available on the RPC website, in person at the RPC office, and can be mailed out upon request.

Elimination of Discrimination

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

Remedial Action

The RPC will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program's 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 documented in the form of a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

- 1) Subrecipient 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 RPC 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.

Procedures Manual

Administration of the Title VI Program will be incorporated into the agency's Procedures Manual and Project Management Guide 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 subrecipient 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 for informing 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 Program**, including our **DBE Policy and Program (in conjunction with Deputy Director)**, **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.

Public Participation (citation)

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 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
- ▶ Public Hearing Procedures
- ▶ Limited English Proficiency (LEP) Guidelines
- ▶ Americans with Disabilities Act (ADA) Procedures
- ▶ Environmental Justice Policy

Consultant Services

- ▶ 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 along with the Intergovernmental Coordinator shall monitor DBE program requirements and progress.
- ▶ The Title VI Coordinator along with the Intergovernmental Coordinator shall ensure that all federally funded consultant contracts administered by the RPC have the appropriate Title VI provisions included.
- ▶ The Title VI Coordinator shall review directives and procedures to ensure Title VI compliance during scoping, development, and implementation.
- ▶ The Title VI Coordinator shall maintain the necessary data and documentation required for completion of the department's Title VI Update Annual Report.

Consultant Contracts

The Regional Planning Commission is responsible for selection, negotiation, and administration of its consultant contracts. RPC undertakes consultant contracts consistent with the laws of the State of Louisiana and grantor guidelines

Contract Procedures

Title VI text is included in all RPC Request for Proposals (RFP), Request for Qualifications (RFQ), and other 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.

Project managers and the Title VI coordinator will work with consultants to form targeted outreach plans when necessary to ensure all have an equal opportunity to participate in planning processes. Measures are laid out in the Project Manager Guide (QCQA) and the Public Participation Plan (PPP).

Requirement to Conduct Equity Analysis to Determine Site Location of Facilities

No such projects were conducted during this reporting period.

Title VI Investigations, Complaints and Lawsuits

At the present time the RPC is not involved in any Title VI investigations, lawsuits or complaints that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and has not received any complaints since the last Title VI submission.

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 in both English and Spanish, 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 225-379-1923. 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 504-483-8513 or mgivhan@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 504-483-8513".

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 504-483-8513 or visit our website at www.norpc.org.

**REGIONAL PLANNING COMMISSION
Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St.
Tammany and Tangipahoa Parishes**

Title VI Assurances

The Regional Planning Commission for Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany and Tangipahoa Parishes (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance 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 the following: 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 be applied to all agency planning and programing.

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 persons whose signatures appear below are authorized to sign the Assurance on behalf of the Recipient.

[Redacted Signature]

Jeffrey Roesel
Executive Director
Regional Planning Commission

Date

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 for purposes of this document is block group level. RPC uses the most current ACS 5-year estimates, which is utilized in all map products and planning efforts.

The Louisiana Department of Child and Family services is available at block group level upon request to further identify vulnerable communities.

RPC has identified six relevant groups for Title VI analysis for the project as described below:

- ▶ Poverty households/population/families
- ▶ Minority/Ethnicity/National Origin
- ▶ Elderly
- ▶ Limited English Proficiency (LEP)
- ▶ 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 geographic distribution throughout the area and how they relate to RPC studies, TIP projects, obligated projects, and projects let to construction. These maps are for RPC internal use and are not made available for public use.

How Mobility Needs of Minority Populations are Identified and Considered Within the Planning Process

RPC makes every effort to ensure that the mobility needs of minority populations are identified and considered within the transportation planning process. The methods RPC utilizes to ensure this are listed below:

- ▶ RPC produces demographic census data for analysis to assist in RPC projects. Project specific boundaries determine Title VI area of analysis determined during project/study development.
- ▶ RPC has used and may undertake in the future transportation surveys or community outreach to members of the community in order to get feedback on their transportation needs. This input is used and incorporated into the development of the Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP).
- ▶ RPC staff members attend and participate in community meetings that focus on convening residents to discuss issues facing minority communities.

- ▶ RPC complies fully with Executive Order (EO) 12898 and makes sure that all citizens are given the opportunity to participate in the planning process. Environmental Justice communities are determined using collected census data and methodology constructed by the Title VI Coordinator and the GIS Manager.
- ▶ RPC ensures that all public meetings are held in areas that are frequented by all members of the community, at times that are most suitable for working citizens. Efforts are made to advertise public meetings in minority publications where available and meeting notices are posted in multiple languages when the project area affects an LEP community.
- ▶ RPC is always open to comments or suggestions via the “Get Involved” section on our website www.norpc.org, or comment sheets available at the front desk of our office at 10 Veterans Memorial Boulevard, New Orleans, LA 70124. All comments are forwarded to appropriate staff and are followed with a response in a timely manner

DRAFT

Limited English Proficiency

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.

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.

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 LEP Plan 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 2015-2019, 5-year estimates, American Community Survey data for the 6-south shore MPO parishes and the 2-north shore MPO parishes that make up the New Orleans and Mandeville-Slidell-Covington urbanized areas and found that 88% of the population reported English as their only language. Of the remaining 12% of the population that reported speaking a language other than English, 8% reported Spanish as language spoken, with 45% of those individuals indicating that they speak English less than “very well.” Also, 2% reported Asian and Pacific Island languages as language spoken, which include Vietnamese, with 53% of those individuals indicating that they speak English less than “very well.” The remaining 2% who speak a language other than English reported Indo-European and “other languages” as their language spoken. American Community Survey data was determined to be the most accurate data available for determining LEP individuals. (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. This information is determined by the GIS mapping of demographic data. Consequently, RPC is cognizant of

the need to translate documents or work with interpreters as necessary when interacting 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 formal requests for interpreters and no requests for translated RPC documents. Staff have had limited contact with LEP persons; however, the RPC has been proactive in identifying LEP communities and translating important documents while also having translators and interpreters present during active outreach such as tabling, community meetings, surveying, etc. Based on the percentage and number of LEP individuals who reported Spanish or Vietnamese as a primary language, the RPC has made portions of its Title VI plan 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. When working in areas identified to have higher percentages of LEP persons the RPC has been proactive in translating outreach material and resources needed to ensure full participation.

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 eastern New Orleans. 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, and consists of primarily of two national origins Mexico, and Honduras. RPC has established a relationship with LatiNOLA in Kenner, Louisiana where a large concentration of Hispanic of Mexican origins are concentrated, and Puentes a Hispanic civic group serving all Hispanic communities of various national origin concentrated in New Orleans East, to help identify the community's LEP needs. The Title VI Coordinator also makes every attempt to attend monthly meetings of the Latino Forum, a metro-wide group of community leaders who meet to discuss the needs of the Latino community and has attended Language Access Coalition meetings in an effort to reach out to non-English speaking and non-literate members of the community. 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 based on most up to date ACS block group data. 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 but makes every effort to translate vital documents and accommodate translation and interpreter requests. *The Title VI policy statement, complaint form, and other important Title VI documents have been translated and will be updated as necessary.*

All oral and written 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 - update

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 is 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 is trained to identify non-verbal clues that a person may have Limited English Deficiency, such as reluctance to fill out surveys or sign-in at public meetings.
- ❖ Staff examines Census Bureau demographic numbers by races 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.
- ❖ Staff maintains ongoing communication with LEP community leaders such as Mary Queen of Vietnam Community Development Center and LatinOLA, as well as seek to establish new relationships.

- ❖ Staff strives to attend various Language Access Coalition meetings as ways to remain engaged with LEP community leaders and disseminate important project information to LEP communities.

Implementing Language Assistance Measures

- ❖ Based on Census Bureau data, RPC will evaluate all documents, and translate those documents deemed most widely accessed, into any language other than English that is spoken less than well by more than 5% of the population or by more than 1,000 people per concentrated area.
- ❖ The RPC has translated Pedestrian and Bicycle Safety into Spanish. The Title VI Plan has been made available on RPC's website.
- ❖ The RPC will continue to search for 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 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 RPC projects and study areas are assessed on a case-by-case basis for LEP needs. 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 and produce a language access plan.**

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 new ACS information 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:

Malissa Dietsch-Givhan

Title VI Coordinator

504-483-8513

mgivhan@norpc.org

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 (504-483-8513), at least one week in advance.
- ❖ RPC will include language in all of our contracts to ensure nondiscrimination of all persons with disabilities

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 an RPC meeting is not accessible to persons with disabilities should be directed to:

Malissa Dietsch-Givhan
Title VI Coordinator /ADA Coordinator
504-483-8513
mgivhan@norpc.org

Environmental Justice

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

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 a neighborhood or community composed predominantly of persons of color and/or a substantial proportion of persons and households below the poverty line.

The RPC using ArcGIS produces an Environmental Justice Awareness layer mapped at the block group level that symbolizes the specific block groups that follow the environmental justice criteria for those areas that are either Minority or Hispanic/Latino (over the parish threshold) and are also below the poverty level. RPC researched solutions from other agencies within the U.S. using varying data sets. RPC determined to use the most inclusive method by intersecting block groups flagged by any of the three poverty determinations (household, population, and family) with those block groups over the parish threshold for minority or Hispanic/Latino.

The RPC takes a proactive approach to engage these communities and ensures their full and fair participation in the transportation decision-making process.

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 and participate more about the transportation planning process
- ❖ Make sure all projects go through an Environmental and Title VI checklist to ensure 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.
- ❖ Ensure equal distribution of the benefits of the transportation planning process and project distribution

Filing an 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, St. Charles, St. John the Baptist, St. Tammany and
Tangipahoa 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, St. Charles, St. John the Baptist, 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.

Malissa Dietsch-Givhan has been delegated as the DBE Liaison Officer. In that capacity, she is responsible for implementing all aspects of the DBE program. Implementation of the DBE program is accorded with 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.

Jeffrey Roesel, Executive Director

Date

Louisiana Department of Transportation

Non-Discrimination Complaint Procedure

The **Louisiana Department of Transportation and Development's** Non-Discrimination Complaint Procedure is made available in the following locations:

-
- Agency website
 - Hard copy in the central office
 - Agency Title VI Plan

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin, disability, sex, age low-income or LEP (Limited English Proficiency) by the **Louisiana Department of Transportation and Development (LADOTD)** may file a Non-Discrimination complaint by completing and submitting the agency's Non-Discrimination Complaint Form.

A complaint must be filed with the **Louisiana Department of Transportation and Development** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Louisiana Department of Transportation and Development** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Louisiana Department of Transportation and Development** has 45 days to investigate the complaint.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant:

a closure letter or a letter of finding (LOF).

- o A closure letter summarizes the allegations and states that there was not a discrimination violation and that the case will be closed.
- o A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 180 days after the date of the letter or the LOF to do so. LADOTD will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

LADOTD maintains a Non-Discrimination Complaint Log for internal tracking purposes. All information contained within the complaint log is kept confidential.

Non-Discrimination Complaint Form

The **Louisiana Department of Transportation and Development** Non-Discrimination Complaint Procedure is made available in the following locations:

- Agency website
- Hard copy in the central office
- Agency Title VI Plan

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible	Format	Large Print	Audio Tape
		TDD	Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Sex <input type="checkbox"/> Age <input type="checkbox"/> Income Status [
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form or a separate sheet of paper.			
Section IV			
Have you previously filed a complaint with this agency?		Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Court	<input type="checkbox"/> State Agency
<input type="checkbox"/> State Court	<input type="checkbox"/> Local Agency
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Louisiana Department of Transportation and Development

Cynthia Harvey Douglas

Compliance Programs-Title VI/ADA

PO Box 94245

1201 Capitol Access Road

Baton Rouge, LA 70804-9245

Phone: 225-379-1923

cynthia.douglas@la.gov



New Orleans Regional Planning Commission

Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany and Tangipahoa 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 mgivhan@norpc.org

NUMBER _____
RESOLUTION

REGIONAL PLANNING COMMISSION FOR

Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany and
Tangipahoa Parishes
RPC Title VI Program

Introduced by _____

Seconded by _____,

On the _____ day of _____, 2025.

WHEREAS, the Regional Planning Commission (RPC) Title VI Program will update the policy of nondiscrimination as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), for the eight parish planning area as described; and

WHEREAS, the Program will ensure that no person within the jurisdiction of the Regional Planning Commission 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; and

WHEREAS, the Title VI Coordinator shall be responsible for coordinating the overall administration of the Title VI program, plan, and assurances; and

NOW, THEREFORE, BE IT RESOLVED, that the Regional Planning Commission hereby adopts the updated RPC Title VI Program, and will furnish copies to member parishes for their use and further consideration.

Whereupon, after discussion, the question was called and resulted in the following:

AYES: _____ NAYS: _____ ABSTENTIONS: _____

And the Chairman declared the Resolution duly carried.

Cynthia Lee Sheng
CHAIRMAN

Matt Jewell
SECRETARY

DRAFT