



TITLE VI

PROGRAM 2024

(337) 806-9368

Planacadiana.org

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Lafayette, LA 70501

Acadiana Metropolitan Planning Organization

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UPDATED:

PREPARED BY THE ACADIANA PLANNING COMMISSION

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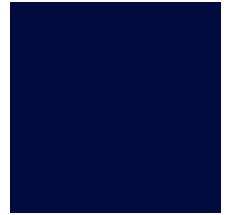


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I. Title VI Plan Policy Statement & Authorities

Statement

The Acadiana Metropolitan Planning Organization (MPO) assures that no person shall, on the grounds of race, color, national origin, income, gender, age, and disability, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

More specifically, the Acadiana MPO assures that efforts will be made to preclude discrimination through the disparate impacts of its programs, policies, and activities on minority and low-income populations. Additionally, the Acadiana MPO will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

Acadiana MPO's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other MPO responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21. ADA and Title VI inquiries should be forwarded to the address on the title page.

This statement of policy is acknowledged by the presiding officer of the Acadiana MPO Policy Board in the letter of transmittal from the Acadiana MPO to the Louisiana Department of Transportation and Development (DOTD).

Sara Fawcett-Gary
Cheif Executive Officer
Acadiana Planning Commission

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 National Environmental Policy Act of 1969 (NEPA) addresses both social and economic impacts of environmental justice. NEPA accentuated the necessity of supplying safe, healthful, productive and aesthetically appealing surroundings, and provides a requirement for taking a systematic, interdisciplinary approach in considering environmental and community factors in decision making.

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.

FHWA issued the FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order 6640.23), which mandated the FHWA and all its subsidiaries to implement the principles of Executive Order 12898 and U.S. DOT Order 5610.2 into all of its programs, policies and activities.



On October 7, 1999, the FHWA and the FTA issued a memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning. This memorandum provides clarification for field offices on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was to help planning officials to understand that environmental justice is equally important during the planning stages as it is during the projects development stages.

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>.

II. What is APC?

About the Acadiana Planning Commission

The Acadiana Planning Commission (APC) — Louisiana Planning District 4 — serves the public sector in the planning and implementation of economic, community, and transportation development throughout the region known as Acadiana, including the Louisiana Parishes of Acadia, Evangeline, Iberia, Lafayette, St. Landry, St. Martin, and Vermilion.

Our goal is to forge a space for creative solutions through collaborations and core values to implement development at the highest level possible. Community and economic development go hand-in-hand; through intentional, catalytic processes, we can change conversations, foster change, and advance Acadiana together.



III. Introduction and Purpose

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 any program or activity receiving federal financial assistance.

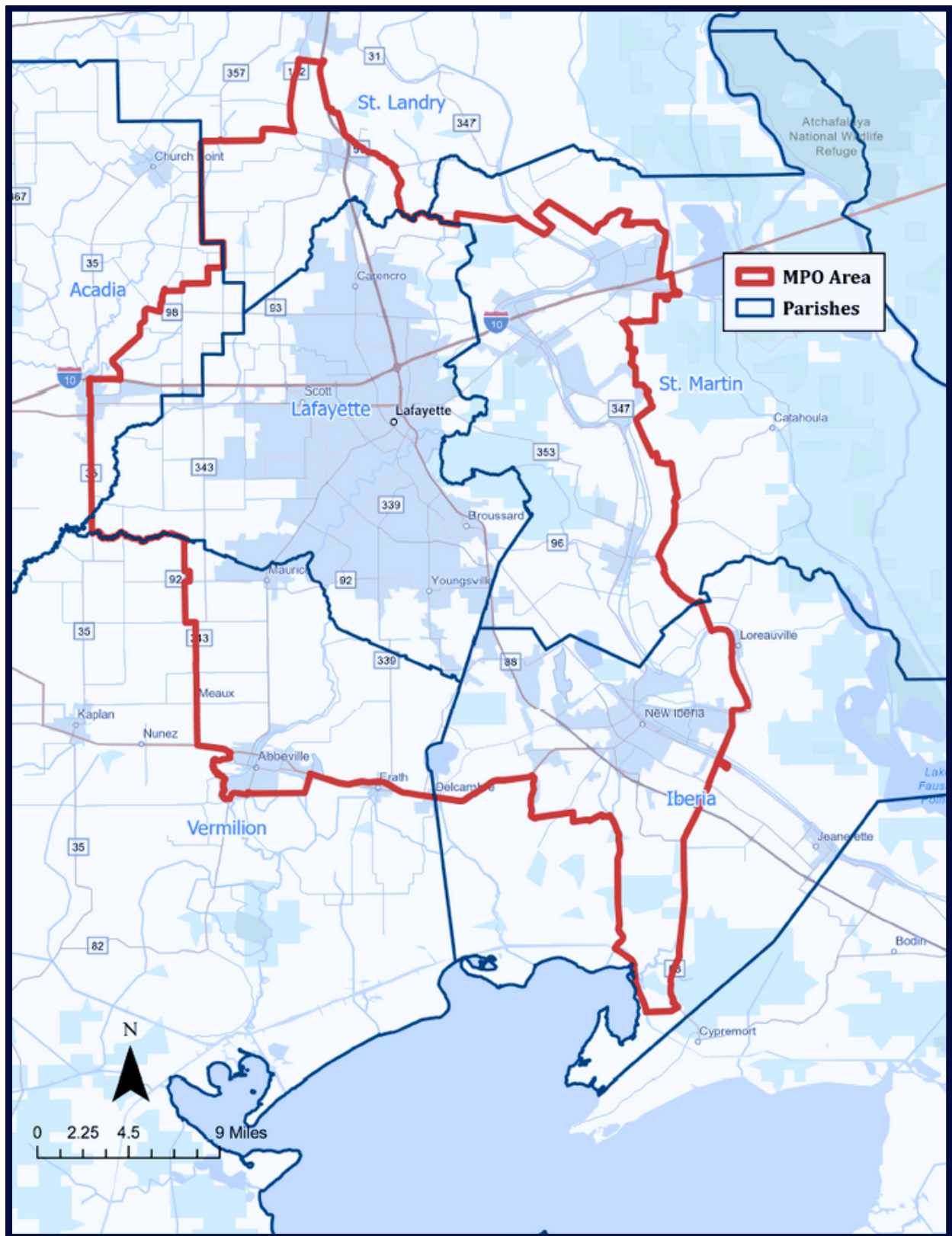
The Acadiana Planning Commission is subject to the requirements of Title VI and the information reporting requirements established by the Federal Transit Administration (FTA) to evaluate the level of compliance concerning the provision of transit services and related benefits. The Acadiana Planning Commission as a Metropolitan Planning Organization (MPO) is not a public transit provider and owns no public transit facilities.

Purpose

The purpose of this document is to communicate the Acadiana MPO plan for addressing the Federal and state non-discrimination requirements under Title VI, Federal Executive Order 12898 and other related regulations and statutes. This document has a companion document of equal importance: the Acadiana MPO's Public Participation Plan. In tandem, these documents describe the Acadiana MPO's plan and approach for addressing the requirements of Title VI. Although they are separate topics, Environmental Justice and Public Participation are closely intertwined issues and complement one another in ensuring fair and equitable distribution of transportation services and facilities.

Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to ascertain the project's success. Effective public participation not only provides transportation officials with novel ideas, but it also alerts them to potential environmental justice concerns during the planning stage of a project. Perhaps the most important charge of public participation is to engender a sense of ownership among those populations directly and indirectly affected by a project.

The Acadiana Metropolitan Planning Organization (MPO) is a subsidiary function of the Acadiana Planning Commission, responsible for planning transportation facilities and services in Lafayette Parish and portions of the Acadia, Vermilion, Iberia, and Saint Martin Parishes. The following page shows a map illustrating the geographic extent of the MPO's boundary.



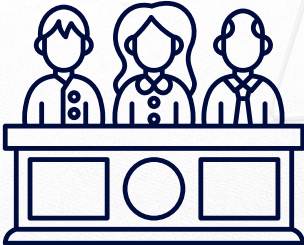
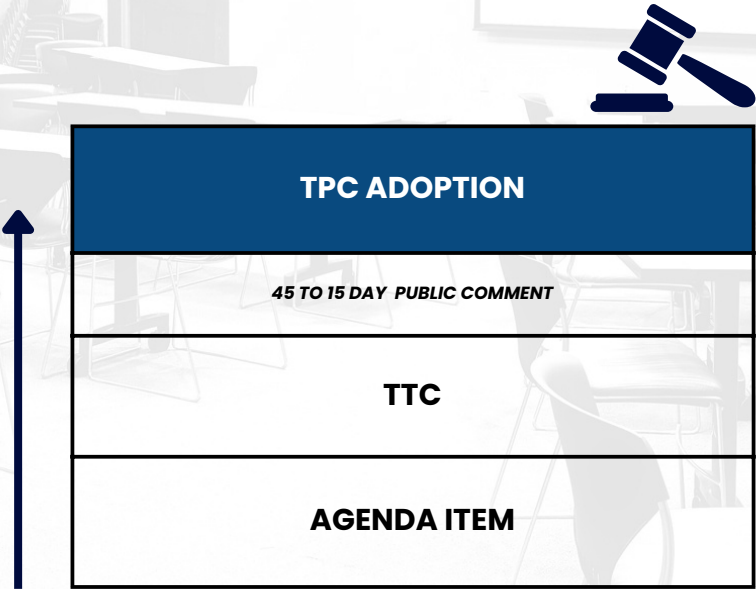
Map 1. MPO Urbanized and Planning Area based on the 2020 Census. Red indicates the MPO planning boundary, blue is parish perimeters, while the lighter gray indicates the Urbanized Area.

IV. Acadiana MPO Planning Process

Through its professional staff of planners, engineers, and mapping specialists, the Acadiana MPO provides planning services pertaining to several integrated program areas:

- 1). Communications & Public Participation
- 2). Transportation Planning & Programming of Roadways
- 3). Environmental Affairs
- 4). Consultant Contracts
- 5). Education and Training

The Acadiana MPO has two seated advisory committees. Transportation Technical Committee (TTC), comprised of professional transportation planners, engineers, and budgetary specialists. The TTC reports to the Transportation Policy Committee (TPC), which is seated by elected officials or their designees.



MPO Planning Committees

Each committee plays a vital role in the community outreach and public education process.

These two committees are: Transportation Technical Committee (TTC) for transportation professionals selected based on their positions in local and state government; and Transportation Policy Committee (TPC) for elected officials or their designees.

The purpose of the **Transportation Technical Committee (TTC)** is to provide technical guidance to policy and decision makers regarding all modes of transportation in the metropolitan area. Specifically, the TTC provides technical advice to the Transportation Policy Committee (TPC) and technical guidance to the MPO and its staff. Recommendations from the TTC are sent to the Transportation Policy Committee for deliberation. The Transportation Technical Committee consists of technical professionals appointed by the member jurisdictions, professional engineers, transportation and land use planners, transit system operators, and other representatives of major modes of transportation.

The Transportation Technical Committee seats were determined by the local public agencies. Membership on these committees varies according to their role. The TTC is based on positions identified in the transportation planning process that are integral to decision making.

The chief purpose of the **Transportation Policy Committee (TPC)** is to serve as the principal body for transportation policy, plan, and program decision-making, and to provide guidance and direction for the development, coordination, and implementation of a multi-modal transportation system in the Acadiana Metropolitan Planning Area. Under agreement between the State of Louisiana and eleven (11) local governments within the Lafayette Urbanized Area, the TPC is established to provide final decisions on transportation planning and funding schedules for the Acadiana Metropolitan Planning Organization (AMPO). The Transportation Policy Committee consists of decision makers of general purpose local government (e.g. mayors, council members, police jurors, or their delegates, etc.) as well as a representative from the local transit agency, the Louisiana Department of Transportation and Development (LaDOTD), and a non-voting representative from the Federal Highway Administration (FHWA).

V. Organization and Staffing of APC

The position of the MPO staff are listed in the table below:

Name	Position
Breux, Rose	Admin. Assistant
Carney, Keefe	Transportation Planner
Czajkowski, Ron	Safety Coordinator
Fawcett-Gary, Sara	Chief Executive Officer
Moran, Ashley	MPO Manager of Policy and Planning
Wiltz, Alicia	GIS Analyst
Yin, Julie	Transportation Modeler

DOTD Compliance Staff

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Title VI/ADA Program Manager
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Title VI Unit - Room 305J
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Title VI Delegation

State of Louisiana
Jeff Landry, Governor
(844) 860-1413 (toll free)

Acadiana Planning Commission
Sara Fawcett-Gary, Chief Executive Officer
(337) 806-9378

Acadiana Planning Commission
Ashley Moran, MPO Manager
(337) 806-9364

Acadiana Planning Commission
Keefe Carney, Title VI Coordinator
(337) 806-9371



VI. General Responsibilities under Title VI

Below are seven general objectives for the MPO as they pertain to Title VI, environmental justice and public input:

- 1). Comply with the public involvement and environmental justice requirements of the Federal and State regulations.
- 2). Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including socio-economic effects, on minority and low-income populations.
- 3). Provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of the Acadiana MPO.
- 4). Ensure full and fair participation by potentially affected communities in the transportation decision making process.
- 5). Inform and educate citizens and other interested parties about ongoing MPO planning activities and their potential role in those activities.
- 6). Assist LADOTD with resolution if a complaint shall occur.
- 7). Internal review of the Acadiana MPO Title VI plan annually.

General Responsibilities of the Title VI Coordinator for the Acadiana MPO

In addition to other planning responsibilities within the MPO and the Planning Commission, the Title VI coordinator shall act as a champion for removing obstacles both to the letter as well as to the spirit of Title VI so as to facilitate and enact substantive compliance. The Coordinator shall advocate compliance and report on the status of that compliance to the local government department head in charge of compliance within their departments, the executive administration of the chief elected official, the Acadiana MPO, FTA, FHWA, and to the public.

The Title VI Coordinator is responsible for ensuring these elements of the plan are appropriately implemented, and maintained:

- 1). Complaint Procedures Revised
- 2). Title VI Notice to the Public
- 3). Records of Title VI Investigations, Complaints or Lawsuits
- 4). Demographic Data
- 5). Service Standards
- 6). Service Policies

VII. Program Area Responsibilities

Program Area 1: Transportation Planning and Programming

The Acadiana MPO is responsible for developing long- and short-range transportation plans to provide efficient transportation services to the region. A comprehensive transportation planning process is used, which entails the monitoring and collection of data related to transportation issues. The MPO coordinates with DOTD, cities, parishes, and transportation providers, seeks public participation, and provides technical support when needed.

Planning and Programming Activities

The MPO is mandated by state and federal law to maintain the region's transportation plans. The Metropolitan Transportation Plan is the long-range transportation plan and includes demographic analyses, development and maintenance of the transportation network model, evaluation of proposed transportation projects and identification of a staged improvement program. The Transportation Improvement Program (TIP) is a four-year program of federally funded projects in the region. Moreover, the Acadiana MPO conducts and supports numerous state and federal planning, compliance, and certification programs, which enable parishes, cities, a transit agency, and DOTD to obtain state and federal funding.

Major Programs

The Acadiana MPO has six major programs: Transportation Improvement Program, Transportation Management, Project Review, Technical Services, Communications and Information Services, and Safety Planning. The purpose of this plan is to establish a blueprint for integrating Title VI into all of the MPO's program areas.

Transportation Improvement Program (TIP)

The Acadiana MPO maintains a TIP that incorporates projects using federal funds, including funds managed by MPO and the state and regionally significant projects, regardless of funding source. Moreover, the MPO conducts ongoing analyses related to plan consistency and air quality, and provides training and assistance to agencies in the region.

Transportation Management Systems

The Acadiana MPO develops Travel Demand Management to monitor existing transportation system performance problems and identify potential solutions to guide decisions on use of federal transportation funds and air quality.

Policy, Plan, and Project Review

The Acadiana MPO ensures that local, regional, and state planning efforts are compatible and mutually reinforcing, working with local governments and state agencies reviewing policies, plans, and projects for consistency with state and regional planning goals.

Technical Services and Regional System Data

The Acadiana MPO provides demographic, economic, travel, and geographic data to member jurisdictions, other agencies, businesses, and the public. The MPO assists member jurisdictions in planning activities and collecting, analyzing, maintaining, and improving datasets to identify, monitor, and forecast trends.

The demographic, economic, and transportation network are modeled to provide prediction on the capacity and demand for future roadways.

Communications and Information Services

The Acadiana MPO develops and provides informational materials on agency activities and services. The agency staff facilitate community engagement and communicate the transportation priorities for the region to outside agencies, businesses, community organizations, and the public.

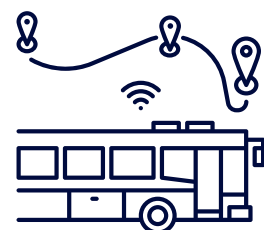
Safety Planning

The Acadiana MPO hosts a Regional Safety Coordinator on staff who works to implement the Louisiana State Highway Safety Plan for the District 03/Acadiana region. The Coordinator manages the Acadiana Transportation Safety Coalition, facilitates safety projects with stakeholders, and promotes highway safety initiatives.

Title VI Coordinator's Responsibilities for Transportation Planning

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's planning process. In addition, the Coordinator seeks to:

- 1). Be a Title VI champion and advocate the identification of Title VI issues involved in the planning and programming process.
- 2). Report on the status Title VI issues involved in the planning and programming process.
- 3). Prepare and update a demographic profile of the region using the current and appropriate statistical information available on race, income, and other pertinent data.
- 4). Develop a process for assessing the distributional effects of transportation investments in the region as part of actions on plan and programming documents.



Program Area 2: Communication and Public Participation

The goal of the Acadiana MPO's communications and public participation program is to ensure early and continuous public notification about, and participation in, major actions and decisions by the MPO. In seeking public comment and review, the MPO makes a concerted effort to reach segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes. The Acadiana MPO utilizes a broad range of public information and participation opportunities, including dissemination of proposals and alternatives, process for written comments, public meetings after effective notice, settings for open discussion, communication programs, information services, and consideration of and response to public comments.

Operational Guidelines

The Acadiana MPO has a Public Participation Plan and a Limited English Proficiency (LEP) Policy which guides the implementation of the Title VI Plan.

Principles of MPO Communications & Public Participation Program

- 1). Equal access is an essential part of the public participation process.
- 2). No major public policy decision is reached or large project implemented without significantly affecting some stakeholders.
- 3). Professionals do not have a monopoly on viable solutions.
- 4). Even if a project or policy decision is sensible and beneficial, it must be arrived at in accordance with public process to be acceptable.
- 5). People are much more willing to live with a decision that is different than their personal point of view if the decision-making process is transparent, objective, and equitable.
- 6). If relevant information necessary for making an informed decision is not provided, the public will rely on and trust others.
- 7). Interacting with an official representative of an organization or group is no substitute for interacting directly with the members of said organization, group, or neighborhood.
- 8). Effective public notification and participation takes time and effort, and can be expensive, yet is essential to sound decision-making and consensus building.

Elements of MPO's Communications & Public Participation Program

- Website
- Civic Functions and Information Request
- Opportunities for Public Comments
- Strategies for Engaging Title VI Protected Groups
- Limited English Proficiency and Language Distribution in Lafayette Parish

Website

The Acadiana MPO maintains a website, which is updated frequently to keep the public informed. The site contains information on the agenda, membership and operation of advisory committees, as well as the MPO's Title VI Notice to the Public. The website is enabled with a Google Translator widget to translate the website's text into a variety of global languages. Additionally, the website has the following major sections:

- **MPO Process**
- **MPO Study Area**
- **Unified Planning Work Program**
- **Transportation Improvement**
- **Program Project Selection Process**
- **MPO Committees**
- **Plans**
- **Technical Data**
- **Projects**

The Title VI Plan and complaint procedures (via links to DOTD) will be posted upon approval of the plan by the DOTD and relevant MPO committees. The Title VI area on the MPO website will be the central location for the Title VI and ADA communications.

The provisional web site address of the Title VI and ADA area is:

<https://www.planacadiana.org/transportation/plans-policies-and-processes>

The user may also contact members of the staff on specific topics of interest either by phone or by email.

Civic Functions and Information Request

Civic functions such as public meetings, public hearings, workshops and forums are held as needed for large transportation projects affecting the public. The Acadiana MPO holds public hearings during major updates to the region's adopted transportation plans and the adopted regional growth and transportation strategy. Minor plan updates occur several times a year; major plan updates occur with less frequency. Public hearings are held when the MPO acts on MPO actions, in the form of resolutions when policy and plans are considered for adoption. At that time, the public is requested to comment on plans, policies and allocation of funds. All MPO board and committee meetings are open to the public and follow public meeting law. Time for citizen comments is reserved at meetings and announced by the meeting chair. Meeting dates and times are posted well in advance on the MPO's website, published on social media, and communicated in frequent MPO emails to which any citizen may subscribe. The MPO also strives to accommodate persons of limited English proficiency (LEP). All meeting agendas will contain the following statement upon approval of the plan by the DOTD and integrated in the clerical processes of the MPO's staff.

ADA Notice: For special accommodations for this meeting, contact the MPO's ADA Coordinator via (337) 806-9370 at least 72 hours in advance.

Staff continues to work to find new and innovative ways to solicit public comments and involve segments of the population within its region. Comments are accepted by phone, fax, social media, email, US mail, Internet, and in person at any meetings.

Opportunities for Public Comments

The Acadiana MPO routinely offers three different means for people to comment on activities, programs, and decisions made at the agency.

1). Comments are accepted via phone, fax, email, U.S. mail, social media, and in person at any board or committee meeting. Contact information for staff is provided on the agency website. The Acadiana MPO policy board and the MPO staff responds to comments received.

2). All MPO board and committee meetings are open to the public and follow Louisiana public meeting law. The Acadiana MPO staff attends and presents at numerous meetings per year. The meeting dates are posted well in advance on the agency's web site in compliance with requirements of state public meeting law and in the MPO's frequent emails. Time for citizen comments is allocated on meeting agendas, and the meeting chair requests citizen comments at least once in every meeting. No advance notice is required to speak during the citizen comment period at any of the meetings. Public comments and responses made during these times are kept on record in the official meeting summaries. The MPO maintains a mailing list; anyone can request to be added to the mailing list. The MPO uses voluntary Attendance/Sign-in Forms at agency meetings open to the public.

3). Formal public comment and review periods are used to solicit comments on major planning and programming activities such as amendments to the Transportation Improvement Program (TIP), new MPO plan adoptions, and adoption and updates to the UPWP. A formal public comment period beings 14 days prior to the scheduled adoption date by the TPC. The information is reviewed by advisory committee and recommendations are provided to the TPC.

Comments can be made in person at any MPO meeting, using a comment form on the agency's website, by email, by social media, by US mail, fax, or telephone. The MPO responds to comments received, and forwards comments to other agencies for a response as appropriate. Comments continue to be accepted until the close of the comment period. Comments and responses received throughout the comment period are reviewed and considered prior to action by the MPO policy board.

Strategies for Engaging Title VI Protected Groups

The Acadiana MPO uses social media and an electronic mailing list to disseminate information and give notice for public comment opportunities. Title VI groups are added to the agency's social media and electronic mailing lists regularly, as they are identified. The social media and email list include community groups that represent Title VI protected groups throughout the region.

The MPO also issues press statements through ongoing relationships with the media whose viewership and listenership may include Title VI protected groups.


As described in the next section, the MPO routinely assesses the need for providing information in languages other than English. The MPO also evaluates the effectiveness of communications and public participation efforts and makes appropriate adjustments to its communication strategy.

Limited English Proficiency and Language Distribution in Acadiana

The 2020 census tract reported another decline of French speakers in Louisiana from the 2010 speakers. Presumably, this is a consequence of the decline of older, Cajun French speaking populations.


Table 2 below, compares the number of Spanish speakers by age to groups of languages including French, Asian, and other languages in the Acadiana MPO. Acadiana contains 2.66% Spanish speaking and 1.2% Non-English speakers from Asia or the Pacific Islands. However, Lafayette Parish does have a large population of speakers of other Indo-European languages at 5.49%. The largest proportion of these speakers are speakers of French and its Louisiana variations of Cajun, Creole, and Patois, taken together who comprise 4.81% of the total population as shown on Table 3.

Table 1 – Language Spoken at Home

Language Spoken at Home Acadiana MPO 			
	Total	Speak English "Very well"	Speak English less than "Very well"
Population 5 years and over	421,219	408,201	13018
Speak only English	380,826	380,826	-
Speak a language other than English	47,064	27,201	12,977
Speak French & Related Louisiana Dialects	20,259	16,932	3,327
Spanish	11,223	5,770	5,453
Asian and Pacific Island Languages	5,058	2,306	2,752
Other Indo-European Languages	2,219	1,166	1,053
Other languages	1,634	304	5


Source: Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over. <https://www.census.gov/>

Table 2 – Age by Language Spoken

Estimates of Age by Language Spoken Acadiana MPO 		
	Language Category	Estimate
5 TO 17 YEARS	Speak Spanish	2,644
	Speak Asian and Pacific Island languages	458
	Speak other Indo-European Languages	1,139
18 TO 64 YEARS	Speak Spanish	8,170
	Speak Asian and Pacific Island languages	4,168
	Speak other Indo-European Languages	8,827
65 YEARS & OVER	Speak Spanish	612
	Speak Asian and Pacific Island languages	568
	Speak other Indo-European Languages	13,162

Source: Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over. <https://www.census.gov>

Table 3 – Number of Speakers of Languages over 5 Years of Age

Orderered List of the Most Frequent Languages Spoken at Home Acadiana MPO 		
Language	Number Of Speakers	Percent Total (%)
English Only	380,826	90.4%
Speak a Language other than English at Home	47,064	11.1%
French & Related Louisiana Dialects	20,259	4.8%
Spanish	11,223	2.6%
Vietnamese	1967	0.4%
Arabic	709	0.17%
Chinese	675	0.16%
German	401	0.09%
Total Population 5 Years and Over	421,219	-

Source: Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over. <https://www.census.gov>

Further discussion of language is found in Section Appendix D – Limited English Proficiency (LEP) Policy and Plan.

Responsibilities of the Title VI Coordinator for Public Communications

The Responsibilities of the Title VI Coordinator for Public Communications are:

- 1). Be a Title VI champion and advocate the development and distribution of information on Title VI and agency programs to the general public.
- 2). Provide information in languages other than English, as needed.
- 3). Disseminate information to minority media and ethnic/gender related organizations, to help ensure social, economic, and ethnic interest groups in the region are represented in the planning process.
- 4). Include the abbreviated Title VI Notice to the Public in press releases and on the website which includes a meeting schedule.
- 5). Notify affected and/or protected groups of public hearings regarding proposed actions, and make the hearings accessible to residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.



Program Area 3: Consulting and Contracts

The Acadiana MPO is responsible for selection, negotiation, and administration of its consultant contracts. The MPO operates under its internal contract procedures and relevant federal and state laws.

Contract Procedures

The Acadiana MPO seeks to follow the following procedures:

- 1). Title VI text is included in MPO Requests for Proposals (RFP) and contracts.
- 2). The Disadvantaged Business Enterprises (DBE) Program is referenced in contract documents.
- 3). The Acadiana MPO includes DBE text in RFPs and contracts with consultants and notes its DBE policy on the MPO website.
- 4). The Acadiana MPO provides links to DOTD's list of certified DBEs on its website.

Remedial Action Related to Consultant Reviews

The Acadiana MPO actively pursues the prevention of Title VI deficiencies and violations and takes the necessary steps to ensure compliance with this Title VI program, both within MPO and with MPO's contractors. In conducting reviews of sub-recipients, if a sub-recipient is found to be noncompliant with Title VI, the Title VI Coordinator will work with the sub-recipient to resolve the identified issues.

If the issues cannot be resolved, the Acadiana MPO will issue a notification of deficiency status and remedial action for the sub-recipient, as agreed upon by the MPO and DOTD, within a period not to exceed 90 calendar days. The MPO will seek the cooperation of the sub-recipient in correcting deficiencies, and will provide the technical assistance and guidance needed for the sub-recipient to comply voluntarily. Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed 90 calendar days after receipt of the deficiency letter and remedial action, to voluntarily correct deficiencies. If a subrecipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the MPO will submit to DOTD, FHWA, and FTA two copies of the case file and a recommendation that the sub-recipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ensure the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the MPO may with DOTD's, FHWA's, and FTA's concurrence initiate sanctions per 49 CFR 21.

Title VI Coordinator's Consultant Contract Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's consultant contracts process. The Coordinator seeks to include Title VI language in contracts and Requests for Proposals (RFP) so as to:

- 1). Be a Title VI champion and advocate compliance with Title VI guidelines and collaborate with the agencies and individuals responsible for the inclusion of the appropriate text notices in agency contracts.
- 2). Notify contractors that the Title VI notice text should be included in subcontracts.
- 3). Advocate and report on the status of the inclusion of the Title VI Notice to the Public included in MPO RFPs.
- 4). Advocate and report on the status of the inclusion of the abbreviated Title VI Notice to the Public in published announcements of the Acadiana MPO's RFPs.
- 5). Advocate and report on the status of the inclusion of the Title VI Assurances in MPO RFPs.



Program Area 4: Environmental Affairs

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

When the MPO 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 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 federal and state requirements are met, and that the public has been involved as appropriate.

Title VI Coordinator's Responsibilities for Environmental Affairs

The Title VI Coordinator is responsible for Title VI environmental justice compliance in aspects of MPO's work that triggers environmental review requirements. The Coordinator seeks to:

- 1). Be a Title VI champion and advocate the identification and report on the status Title VI issues involved in the environmental planning process.
- 2). Participate in the drafting of Title VI environmental justice compliance of Environmental Impact Statements (EIS) and Environmental Assessments (EA) prepared by MPO and/or MPO consultants.
- 3). Participate in the analysis of transportation projects regarding the population affected by the action.
- 4). Participate in the analysis of transportation projects regarding the impacts on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.
- 5). Disseminate information to the public in accordance with agency public participation procedures. This includes the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

Program Area 5: Training and Education

Minorities, women, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in employment related decisions, including opportunities for education and training.

Employees Encouraged to Participate in Training

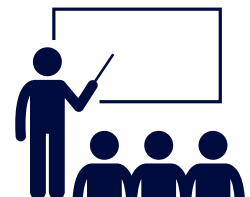
All MPO employees are encouraged to participate in professional development and training. Materials received by the agency on training and education opportunities are made available to employees, which includes information on federally funded training, such as courses provided by the National Highway Institute (NHI), the National Transit Institute (NTI), the American Planning Association (APA), the American Institute of Architects (AIA), and the American Society of Civil Engineers (ASCE), the Department of Transportation and Development (DOTD), the Association of Metropolitan Planning Organizations (AMPO) and the Federal Highway Administration (FHWA). In addition, the MPO provides opportunity and training with in-house power users and third party developers for training in the use of software such as ARC Map, and AutoCAD. MPO employees regularly participate in webinars and other educational events sponsored by these professional associations.

Title VI Coordinator's Training Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the education and training program. DOTD will provide information on training opportunities open to MPO staff and sub-recipients, including information on training provided by NHI and NTI. The Coordinator seeks to:

- 1). Assist DOTD in the distribution of information to MPO staff on training programs regarding Title VI and related statutes.

- 2). Advocate equal access and participation of MPO employees and interested public participants in the planning process in courses sponsored by the National Highway Institute (NHI, National Transportation Institute (NTI), American Planning Association (APA), ethics courses sponsored by the Louisiana Chapter of the APA, and American Institute of Certified Planners (AICP).



VIII. Public Engagement of Title VI

For questions on the MPO's Title VI Plan, ADA Plan, the LEP Plan or any related policies and procedures, please contact the MPO's Title VI and ADA Coordinator using the contact information listed in this document.

For information on the MPO's work program or publications, including reports, data forecasting, maps, or other information available for use, contact the MPO Title VI Coordinator using the contact information listed in this document.

For information on any of the above, including current public comment periods and meetings open to the public, visit the MPO's website at planacadiana.org.

Contact Us

We would love to hear from you! Please use this form to contact us at info@planacadiana.org.



Acadiana Planning Commission
101 Jefferson St., Suite 201
Lafayette, LA 70501-7007

337-806-9368 📞

337-866-7081 📠

info@planacadiana.org @



*First Name
*Last Name
*Email
Phone Number
Subject
*How Can We Help?
SEND

<https://www.planacadiana.org/about/contact-us/>



Table 4 – List of Transit-related Title VI Investigations, Complaints, & Lawsuits

	Date	Summary	Status	Action Taken
Investigations				
1).				
2).				
Lawsuits				
1).				
2).				
Complaints				
1).				
2).				

The Title VI Coordinator is responsible for receiving, reviewing, and processing all Title VI complaints in a professional and timely manner according to the Procedures delineated in the antecedent sections.

To date, the Acadiana MPO has no Title VI complaints on record. Appendix G includes a sample form for future use to document any received Title VI Complaints.

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

APC 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 APC'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 the tract level, which the APC utilizes in all map products and planning efforts. The Louisiana Department of Child and Family services is available at the tractlevel upon request to further identify vulnerable communities.

APC has identified six relevant groups for Title VI analysis as described below:

- Minority
- Ethnicity
- Elderly
- Language spoken at home, other than English
- Disabled Populations
- Zero Car Households



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

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

- APC produces demographic census data for analysis to assist in APC projects.
- APC utilizes transportation surveys and community outreach to members of the community in order to get feedback on their transportation needs. This input is used and incorporated into our Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP).
- APC staff members attend and participate in community meetings that focus on convening residents to discuss issues facing minority communities.
- APC complies fully with Executive Order (EO) 12898 and makes sure that all citizens are given the opportunity to participate in the planning process through the National Environmental Policy Act (NEPA).
- APC ensures that all public meetings are held in areas that are frequented by all members of the community, at times that are most suitable to working citizens. Effort is made to advertise public meetings in minority publications where available and meeting notices are posted in multiple languages when project area affects an LEP community.
- APC is always open to comments or suggestions via the "Contact Us" section on our website www.planacadiana.org/about/contact-us. All comments are forwarded to appropriate staff and are followed with a response in a timely manner.

Environmental Justice Policy

It is the policy of the Acadiana 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 APC identifies minority communities through the use of Census data. Low income communities are identified with Louisiana State Department of Social Services data. APC maps Census and Social Services data to more accurately locate concentrations of target populations. The APC takes a proactive approach to engage these communities and ensures their full and fair participation in the transportation decisionmaking process.

Executive Order 12898

The Acadiana 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.



Goals and Objectives

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

- 1). Protect environmental quality and human health in all conditions.
- 2). Avoid disproportionate adverse impacts on minority and low income populations.
- 3). Enhance the public involvement process and strengthen relationships with community organizations.
- 4). Provide minority and low income populations with the opportunity to learn more about the transportation planning process.
- 5). Improve the quality of transportation in their lives.
- 6). Make sure all projects go through an Environmental and Title VI checklist to insure environmental issues are considered and appropriate actions are followed.
- 7). Promote and protect community members' rights to participate meaningfully in decisions that may affect them.
- 8). Make the process of filing environmental justice complaints easy through readily available forms on the Acadiana Planning Commission website and in the APC office, and by designating an identified APC staff member as the Title VI Coordinator that citizens can easily speak with.

Filing an Environmental Justice Complaint

Any individual or community that wishes to file an environmental justice complaint or discuss concerns about the Acadiana Planning Commissions transportation planning process may contact:

Cynthia H Douglas
Title VI/ADA Program Manager
LA DOTD – Compliance Programs Section
Title VI Unit – Room 305J
P.O. Box 94245 Baton Rouge, LA 70804–9245

Phone: (225) 379–1923
Email: cynthia.douglas@la.gov

VII. Appendices

Appendix A – Title VI Methodology Identification of Target Population Demographics

Appendix B – Title VI Assurances

Appendix C – Title VI Public Notice

Appendix D – Limited English Proficiency Policy and Plan

Appendix E – ADA Notices

Appendix F – DBE Policy

Appendix G – Discrimination Complaint Process and Form

Appendix I – Title VI Training Opportunities

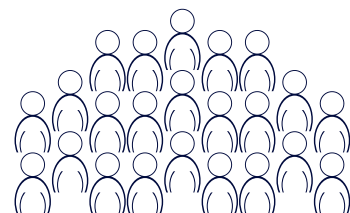
Appendix A – Title VI Methodology Identification of Target Population Demographics

The geographic basis for Title VI analysis is based on the latest U.S. Census data. For the purposes of Title VI analysis, it is desirable to make the analysis on the smallest geographic unit available for which information is obtainable for all relevant groups. Census data is available at different levels, including political jurisdictions, urban area, place, census tract, block group and block. The Census Bureau does not calculate all of its data on each of these areas. The smallest geographic area that the Census Bureau calculates the appropriate information on each relevant group is the tract level, so all products are displayed at that geographic designation.

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

- Elderly Residents 65 & Older
- Persons with Disability
- Minority Population
- Hispanic Population
- Language spoken at home, other than English
- Zero car Households
- Low Income Population

Following the identifications of the relevant groups for analysis, the next step undertaken was to identify the general distribution of each Title VI population group throughout the APC region and then define where each group is most concentrated.



Target Groups

Minority Populations

Persons considered being minorities are identified in the census as people of African, Hispanic, Asian, American Indian or Alaskan Native origin (U.S. Census, STF301/Tb1008 and Tb1011; 1990). Executive Order 12898 and the DOT and FHWA Orders on Environmental Justice consider minority persons as persons to any of the following groups:

- **Hispanic American** – a person of Mexican, Puerto Rican, Cuban Central or South American or other Spanish culture or origin, regardless of race.
- **African American** – a person having origins in any of the black racial groups of Africa.
- **Asian American** – a person having origins in the Far East, Southeast Asia or the Indian subcontinent.
- **American Indian** – a person having origins in North America and who maintains cultural identification through tribal affiliation or community recognition.

Elderly – Any persons over the age of 65.

Limited English Proficiency (LEP) – Any readily identifiable group of persons whose ability to read, write and speak English and compute and solve problems has not reached levels of proficiency necessary to function on the job and in society, to achieve one's goals and develop one's knowledge and potential. Households with a primary or home language other than English, who must, due to limited fluency in English, communicate in that primary or home language.

People with Disabilities – Persons who have mobility and/or self-care limitations as defined by the Census. The disability may be physical or mental and include people with a health condition that lasts six or more months, making it difficult to go outside the home alone or to take care of their own personal needs.

Zero car households – Households without vehicles or access to one.

Population below Poverty Level – Population whose income in the past 12 months is below the federal poverty level.

One monitoring technique used to minimize the potential adverse effects on affected populations is to identify and create demographic profile maps of elderly, low income, disabled, and minority populations for the Acadiana MPO area.

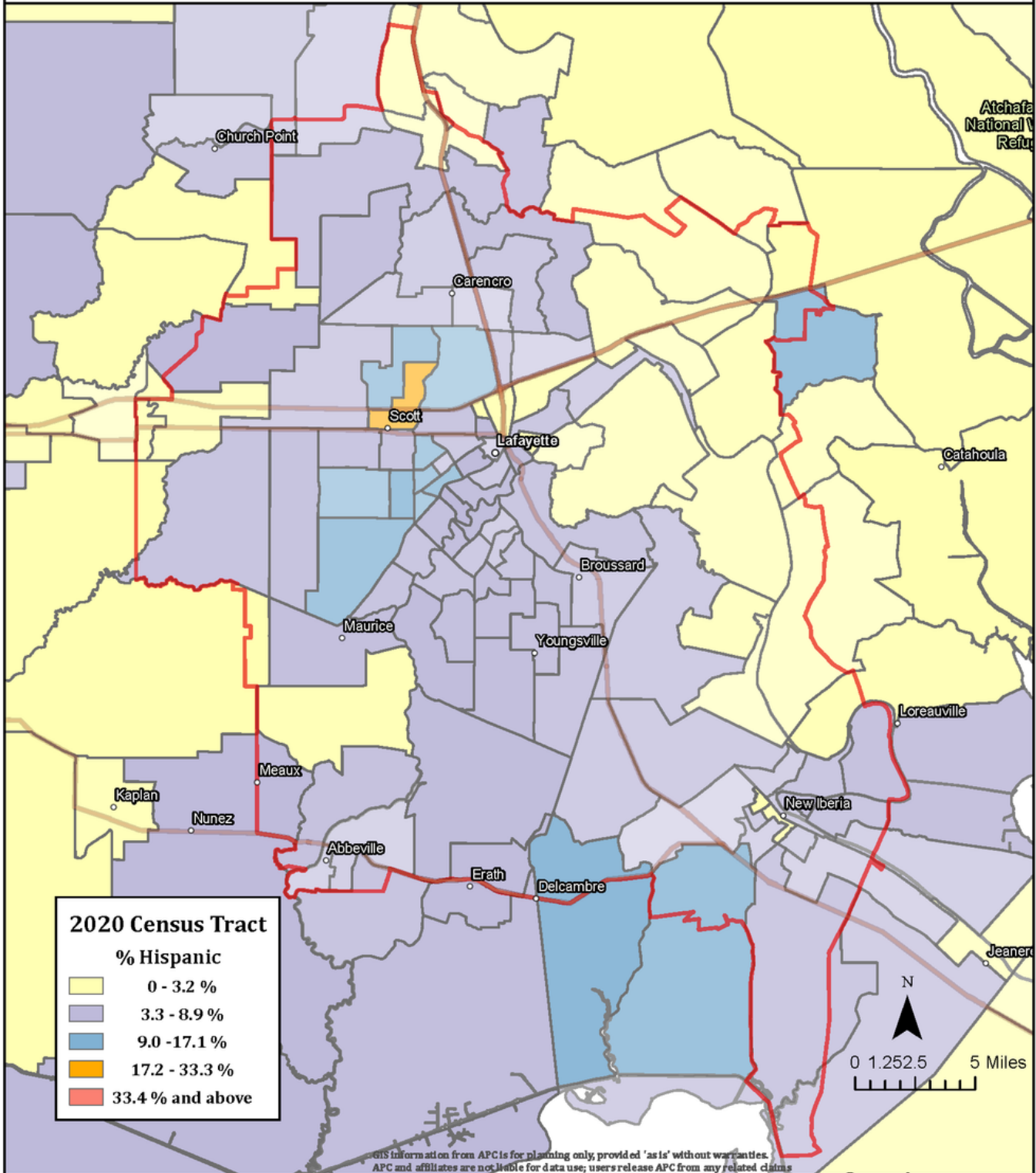
These maps aid planners in understanding which communities are prone to environmental justice infractions. Once planners have an understanding where communities are located, future transportation plans and projects can include these communities in the planning process.

Developers of planning studies and TIP project developers can utilize these maps and dashboard to focus on the equitable distribution of transportation benefits and potentially adverse impacts caused by future projects.

These same demographic profile maps can also be used to verify past compliance with Title VI. Identifying prior MPO projects and mapping them against demographic profile maps will let the MPO know if fair and equitable distribution of services, facilities and resources within the MPO planning area has been met.

Percent of Hispanic

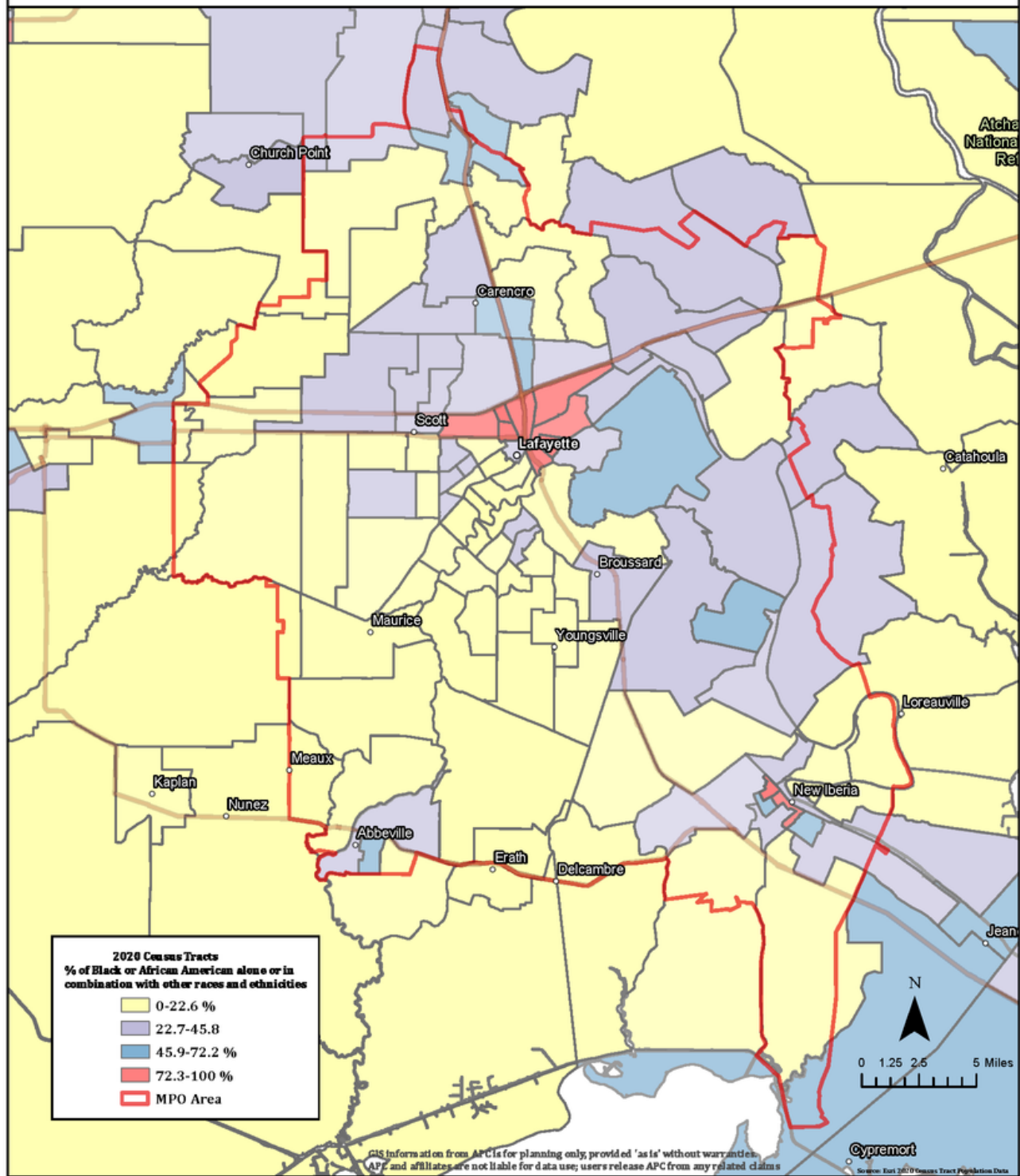
by Census Tract



Map 1. Percent of Hispanic Population by 2020 Census tract.
Red indicates the MPO planning boundary.



Percent of Black or African American or in combination with any other race and ethnicities by Census Tract

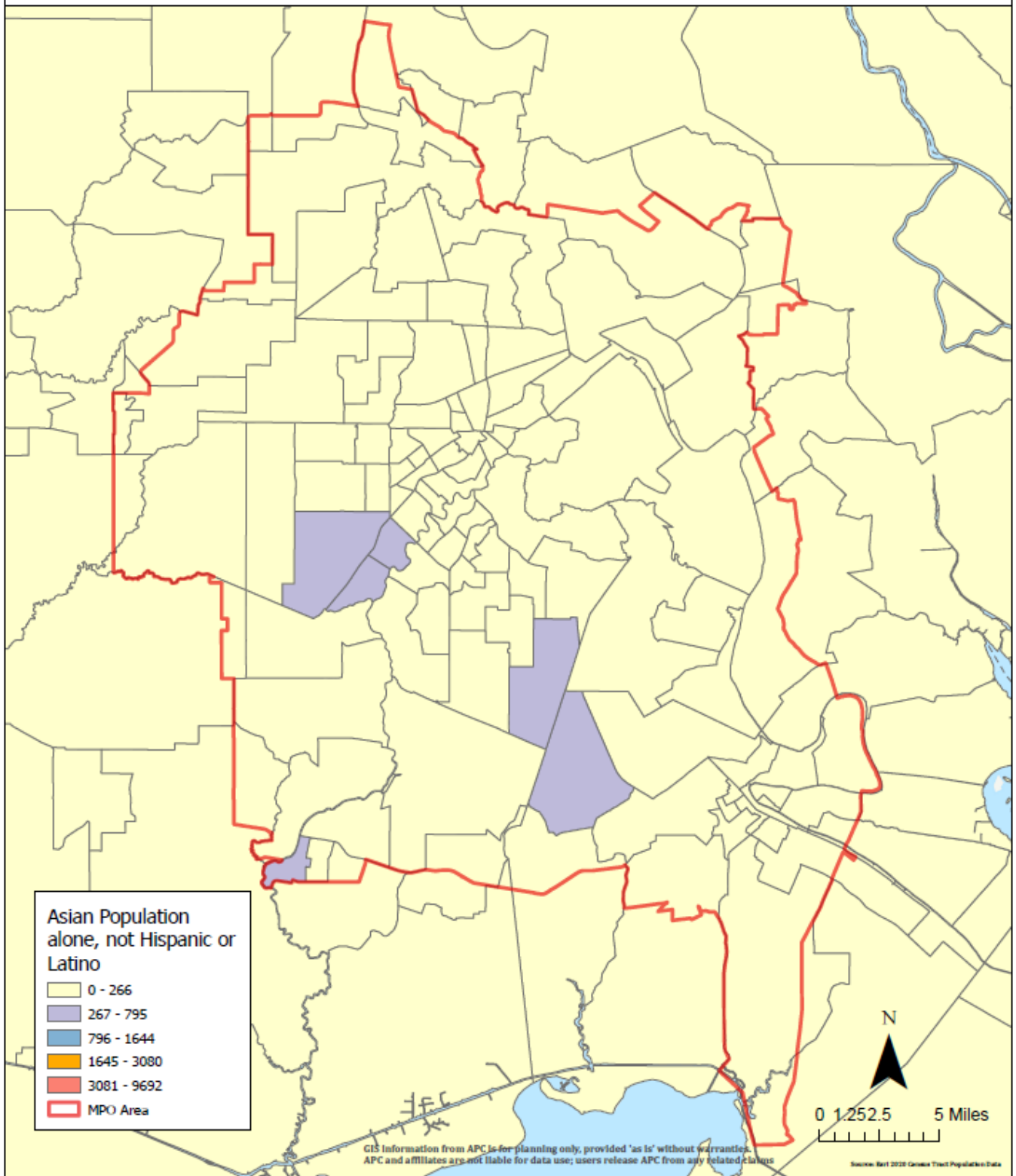


Map 2. Percent of African American Population by 2020 Census tract. Red indicates the MPO planning boundary.



Population Asian American

by Census Tract

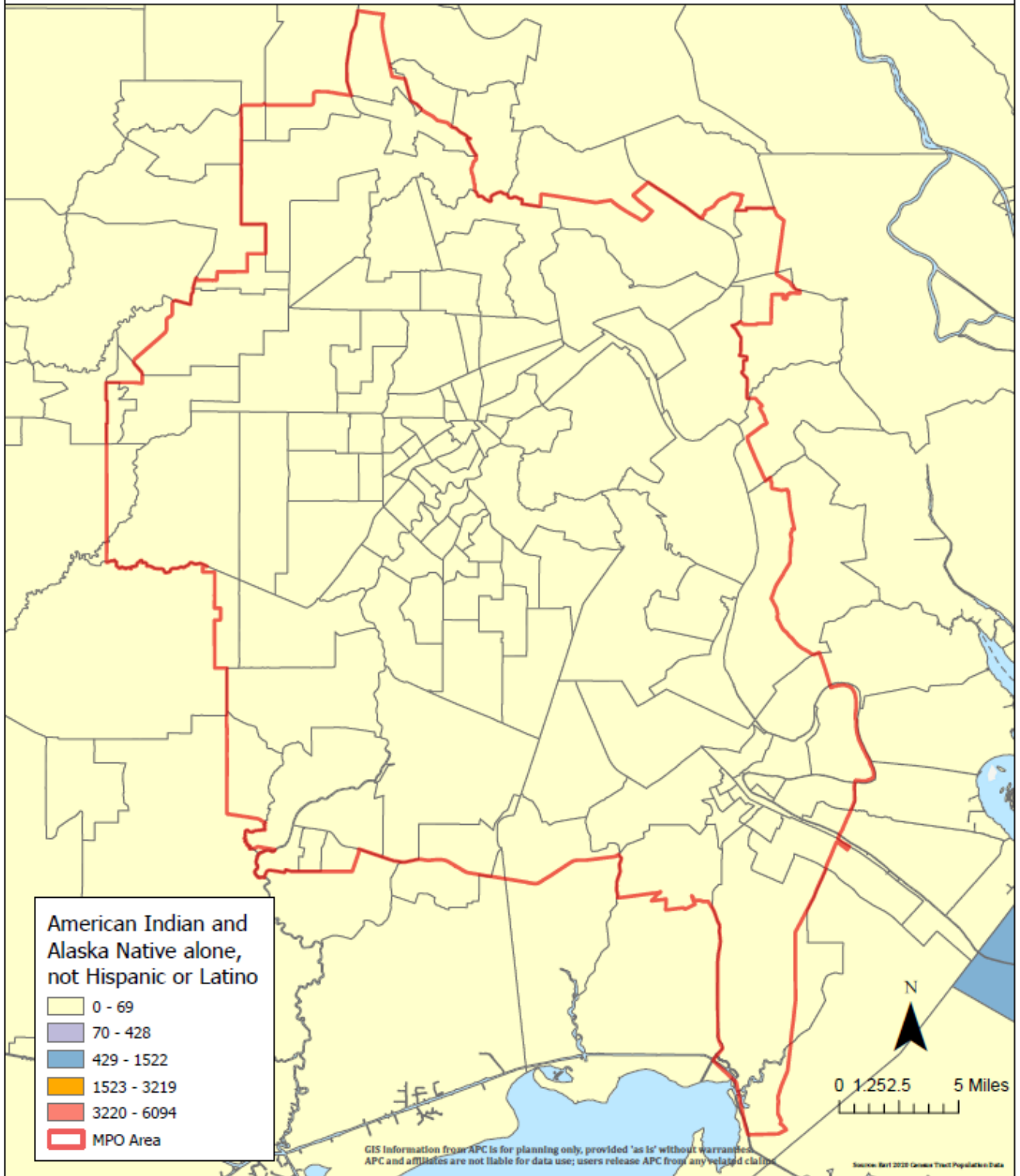


Map 3. Percent of Asian American Population by 2020 Census tract. Red indicates the MPO planning boundary.



Native American Population

by Census Tract

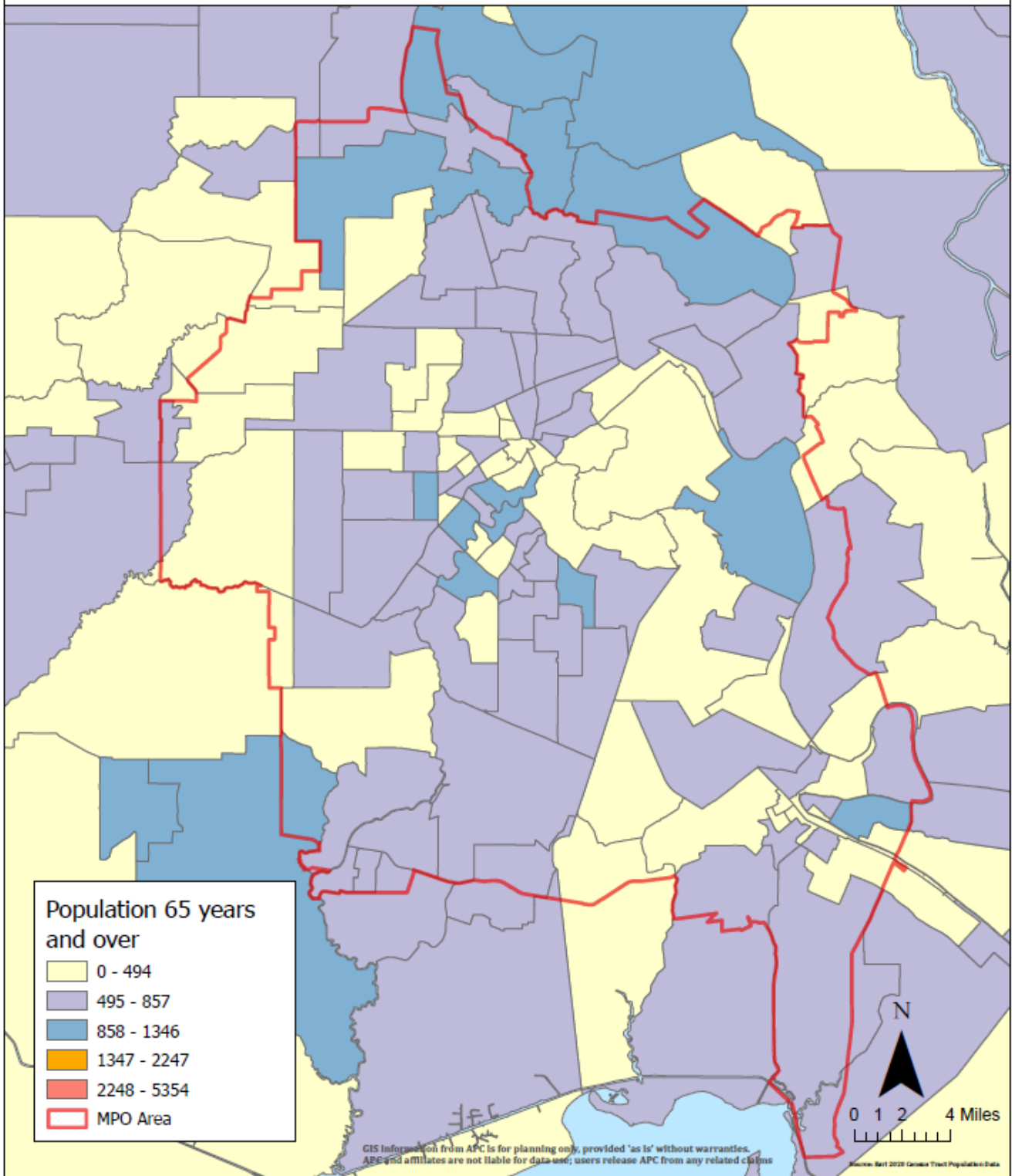


Map 4. Percent of American Indian Population by 2020 Census tract.
Red indicates the MPO planning boundary.



Elderly Population (Over 65)

by Census Tract

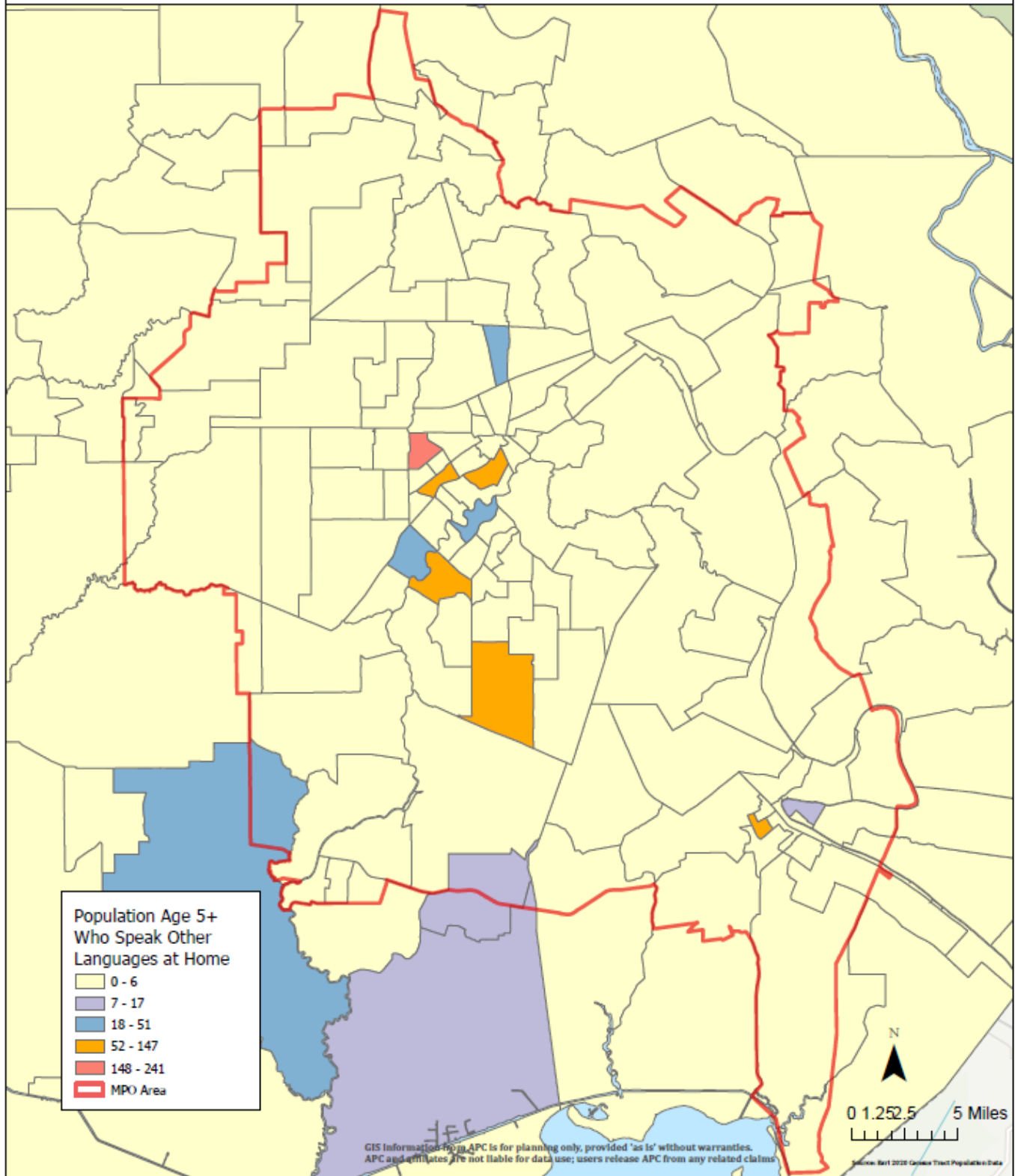


Map 5. Population 65 years and over by 2020 Census tract. Red indicates the MPO planning boundary.



Population Age 5+ Who Speak Other Languages at Home

by Census Tract

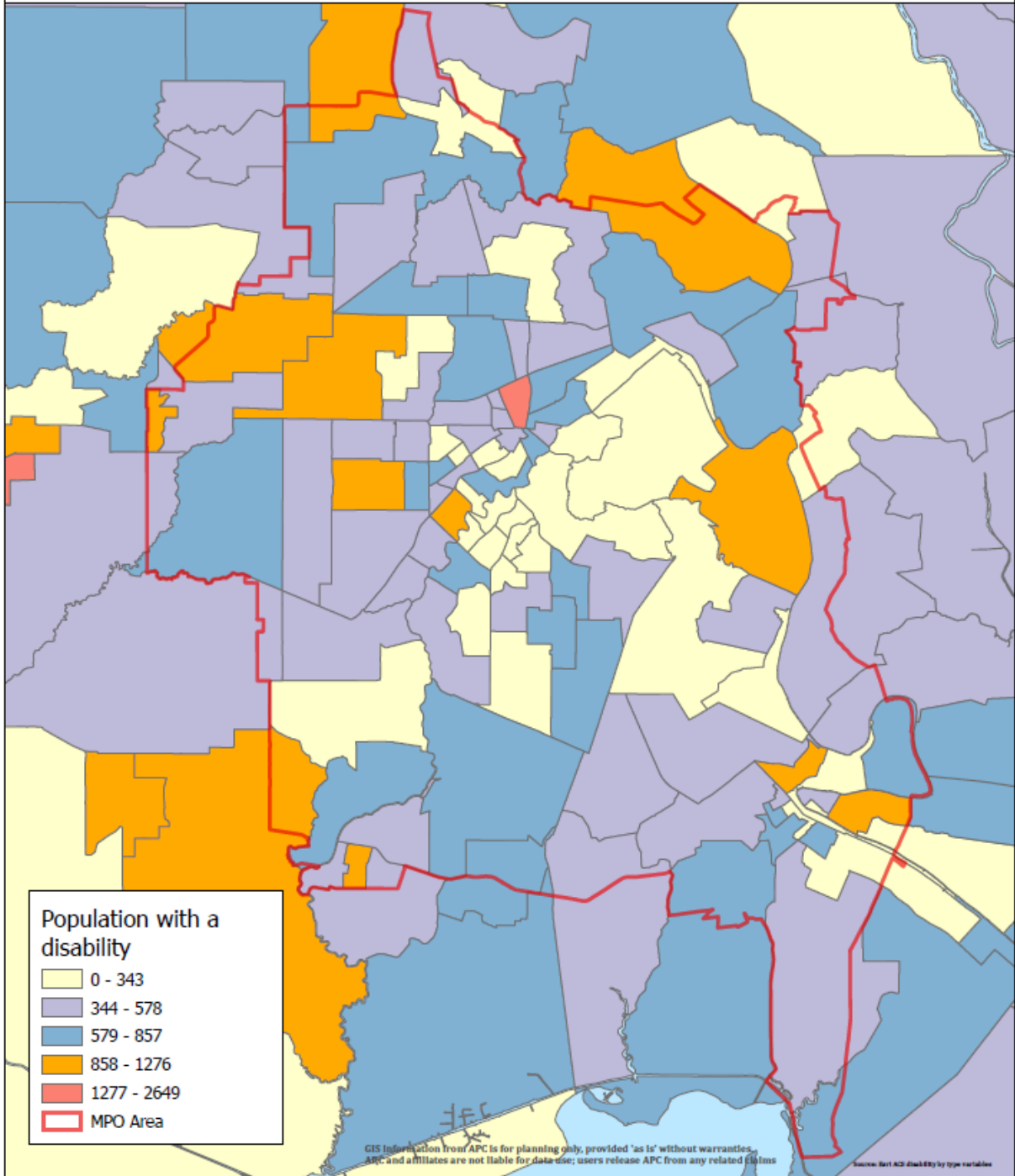


Map 6. Population who speak Other Languages at Home by 2020 Census tract. Red indicates the MPO planning boundary.



Disability Population

by Census Tract

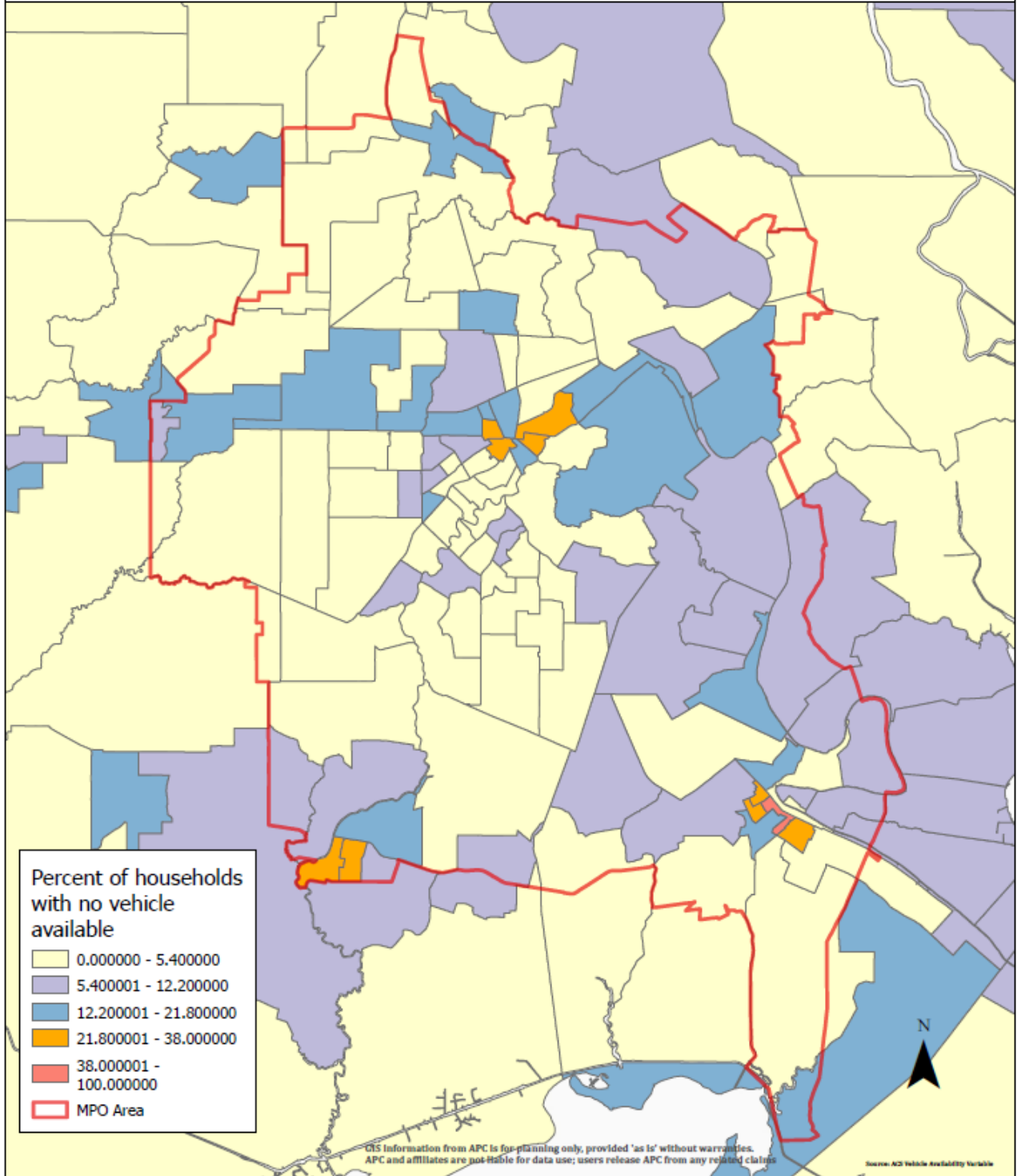


Map 7. Population with a Disability by 2020 Census tract.
Red indicates the MPO planning boundary.



Zero Car Households

by Census Tract

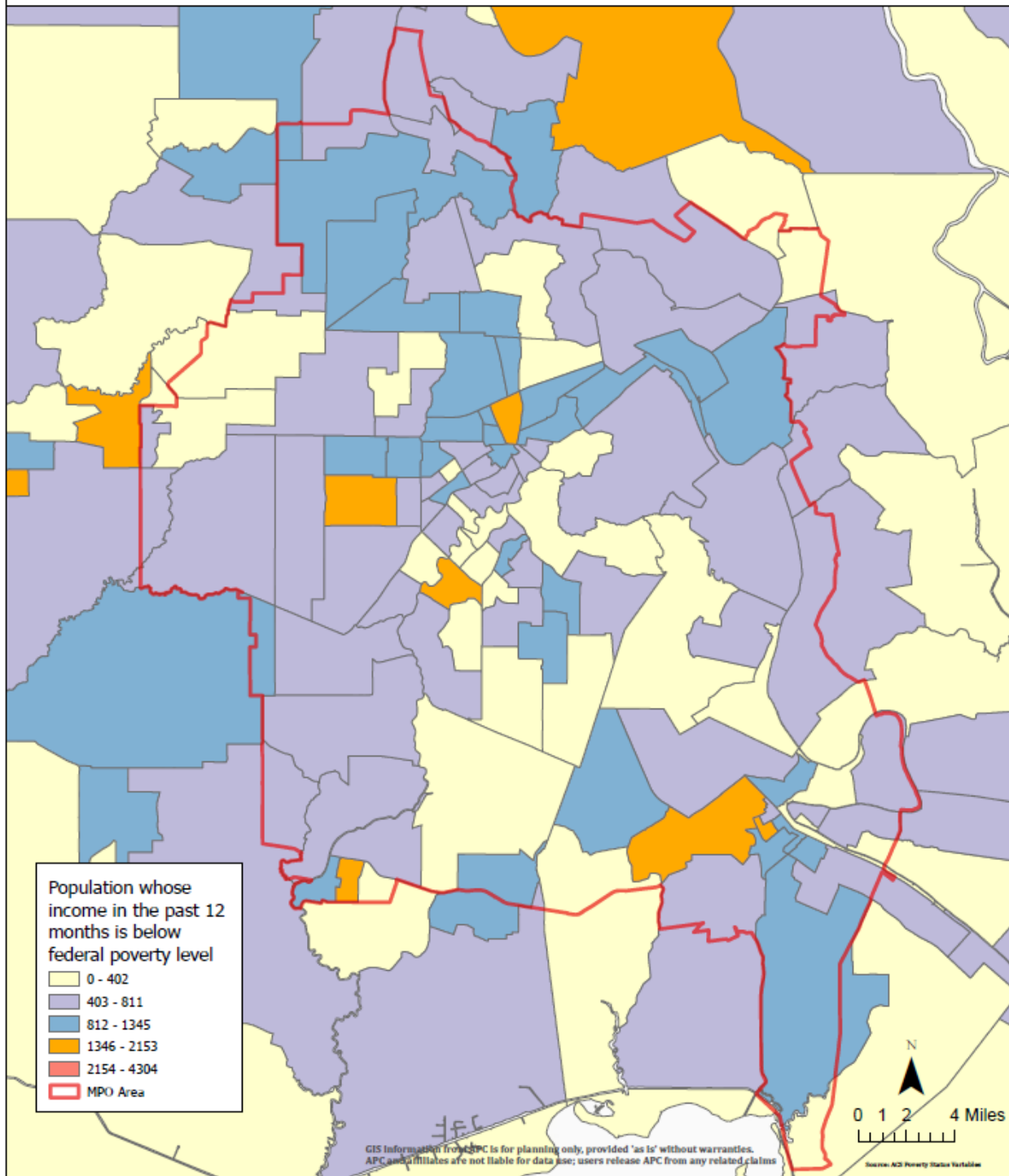


Map 8. Percent of Households with No Vehicle Available by 2020 Census tract. Red indicates the MPO planning boundary.



Population below Poverty Level

by Census Tract



Map 9. Population whose income is below the federal poverty level by 2020 Census tract. Red indicates the MPO planning boundary.

Appendix B - Title VI Assurances

The Acadiana Planning Commission for St. Landry, Acadia, Lafayette, St. Martin, Iberia, and Vermillion 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) (1) 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 Acadiana 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.

Sara Fawcett-Gary
Chief Executive Officer
Acadiana Planning Commission

Date

Appendix C – Title VI Public Notice

The paragraph below will be inserted in all significant publications that are distributed to the public, such as future versions and updates of the Metropolitan Transportation Plan; and Regional Transportation Improvement Program for the APC region. The text will remain permanently on the agency’s website, www.planacadiana.org and intranet (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 Acadiana Planning Commission (APC) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in all programs and activities. APC 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 and Development (LADOTD). LADOTD’s 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.

APC 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 APC Title VI Coordinator at 337 - 806-9371. If you wish to attend an APC function and require special accommodation, please give APC one week’s notice in advance.

Abbreviated Title VI Notice to the Public

The following shortened version of the above paragraph can be used in publications and in classified newspaper announcements:

APC 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.planacadiana.org or call our Title VI Coordinator at (337) 806-9371.



Appendix D – Policy and Plan for Engaging Individuals with Limited English Proficiency (LEP)

Limited English Proficiency Policy

The Acadiana Planning Commission (APC) 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. APC’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 APC proactively identifies communities with high concentrations of LEP persons and employs tactics and strategies to effectively engage them in the planning process. The APC 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.

Sara Fawcett-Gary
Chief Executive Officer
Acadiana Planning Commission

Date

Limited English Proficiency and Language Distribution Plan in Acadiana

The Acadiana MPO has developed this Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Acadiana MPO services as required by Executive Order 13166. Limited English Proficiency individuals are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English as a result of their national origin.

Summary

According to Department of Justice guidance, the MPO should consider providing materials in a different language if over 5% of the affected population speaks that language at home or 1,000 speakers of languages other than English exist. Moreover, the MPO's website is enabled with a Google Translator widget so that the website's text can be automatically translated into a variety of global languages as required.

Nature and Importance of the Program

While essential to the long-term livability and economic vitality of the region, long-range transportation and growth management planning may not be as important of a service to LEP individuals as health care, employment or financial assistance. However, any opportunity to increase public comment on long-range decision-making is a worthwhile investment.

Safe Harbor Stipulation

Federal law provides a "safe harbor" stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A "safe harbor" means that as long as a recipient (the MPO) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI. However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four factor analysis. Evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons (whichever is less) of eligible persons served or likely to be affected. Translation can also be provided orally. This is particularly important for Louisiana French, which is a specific dialect

The “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

The Four Factor Analyses

The Acadiana Metropolitan Planning Organization (MPO) has developed a Limited English Proficiency Plan (LEP) and Methodology to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

For languages other than French, Spanish, and Chinese, services should be requested three full days before a public meeting so that a translator in that community can be identified and their competence evaluated. Electronic means of translation can also be utilized through cellphone apps if there is not enough time to obtain a translator like Google translator services.

These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. In developing the plan, while determining the Acadiana MPO’s extent of obligation to provide LEP services, the Acadiana MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

1). The number or proportion of LEP individuals eligible to be served or likely encountered by the Acadiana MPO program, activity or service: In order to determine the number or proportion of LEP persons eligible to be served or likely to encounter a MPO program, activity, or service, the Acadiana MPO examined the US Census Bureau’s multi-year American Community Survey data for 2020.

The Acadiana MPO staff reviewed the 2020 U.S. Census Report and determined that 47,064 persons in the Acadiana MPO area [11.1% of the population above the age of 5] speak a language other than English. Of those 47,064 persons 11,223 speak Spanish, 20,259 persons speak French, Cajun, or Haitian, 2,219 speak other Indo-European, 5,058 speak Asian or Pacific Islander Languages, 401 speak German, 215 speak Russian, 709 speak Arabic, and 309 speak other languages. Of the population speaking languages other than English, only 3% of the MPO area population have limited English ability.

The table below shows the number of language speakers over 5 years of age in the Acadiana MPO planning area. The distribution shows that although French is close at 4.8%, no other language is higher than the 5% threshold.

Rank Order List of the Most Frequent Languages Spoken at Home in Acadiana MPO, Ages 5 Years and Over		
Language	Number Of Speakers	Percent Total (%)
English Only	380,826	90.4%
Speak a Language other than English at Home	47,064	11.1%
Population with Limited English Ability	13,018	3%
French & Related Louisiana Dialects	20,259	4.8%
Spanish	11,223	2.6%
Vietnamese	1,967	0.4%
Arabic	709	0.17%
Chinese	675	0.16%
German	401	0.09%
Total Population 5 Years and Over	421,219	-

Source: Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over . <https://www.census.gov>

2). The frequency with which LEP individuals come in contact with the Acadiana MPO program, activity or service: The frequency and extent with which LEP individuals come into contact with MPO programs is estimated to be minimal to moderate. Over the past ten years, Acadiana MPO has had no service requests for interpreters and no requests for translated program documents.

3). The nature and importance of the program, activity or service provided by the Acadiana MPO: While essential to the long-term livability and economic vitality of the region, long-range transportation and growth management planning may not be as important of a service to LEP individuals as health care, employment or financial assistance. However, any opportunity to increase public comment on long-range decision-making is a worthwhile investment.

4). The resources available to the Acadiana MPO and overall costs. The Acadiana MPO reviewed its available resources that could be used for providing LEP assistance. Currently, we have a qualified diverse staff team with language capabilities in French, Spanish, and Chinese. Digital products such as Google Translate and Apple Translate can be quickly utilized to provide assistance if a qualified translator is not immediately available.

Monitoring and Updating the LEP Plan

This plan is designed to be dynamic and easily updated. At a minimum, APC will follow the Title VI Program update schedule for the LEP Plan. Each update examines all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the parishes comprising the urbanized area?
- Has there been a change in the types of languages where translation services are needed?
- Has APC fulfilled the goals of the LEP Plan?
- Were any complaints received, forwarded or referred to LADOTD?

LEP persons may obtain copies or translations of the plan upon request. Any questions or comments regarding this plan should be directed to the APC Title VI Coordinator.



Appendix E – ADA Notices

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 Acadiana Planning Commission (APC) will not discriminate against qualified individuals with disabilities on the basis of disability in APC’s services, programs or activities.

APC’s ADA Commitment

- 1). APC will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend all APC public meetings.
- 2). APC will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in APC’s public meetings.
- 3). APC will post the following ADA notice at the bottom of all APC meeting notices:

ADA NOTICE: For information on the Meeting or Recommendations contact 337-806-9368 at least one week in advance.

- 4). APC will include language in all of our contracts to ensure nondiscrimination of all persons with disability.

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

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

Keefe Carney
Title VI Coordinator /ADA Coordinator
(337) 806-9371
kcarney@planacadiana.org



Appendix F – DBE Policy

DBE Policy – Participation by Disadvantaged Business Enterprises In Acadiana Planning Commission Programs – It is the policy of The Acadiana Planning Commission (APC) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of APC contracts in a nondiscriminatory environment. The objectives of APC’s Disadvantaged Business Enterprise (DBE) Program are to ensure non-discrimination in the award and administration of contracts, ensure firms fully meet eligibility standards, help remove barriers to participation, create a level playing field, assist in development of a firm so it can compete successfully outside of the program, provide flexibility, and ensure narrow tailoring of the program.

The Acadiana Planning Commission, and its consultants and sub consultants shall take all necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of The Acadiana Planning Commission in a non-discriminatory environment. The Acadiana Planning Commission requires from its consultants, non-discrimination on the basis of race, color, national origin, income, gender, age, and disability in the award and performance of its contracts.

DBE Clause to Be Included Within the Body of All Future Contracts Issued by APC Participation By Disadvantaged Business Enterprises In Acadiana Planning Commission Programs – It is the policy of The Acadiana Planning Commission (APC) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of APC contracts in a nondiscriminatory environment.

The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, income, gender, age, and disability in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of USDOT/FTA assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as APC deems appropriate.

Sara Fawcett-Gary
Chief Executive Officer
Acadiana Planning Commission

Date

Appendix G – Discrimination Complaint Process and Form

Acadiana Metropolitan Planning Organization (MPO) Title VI Discrimination Complaint Form		
Your Name:	Phone:	Name of Person(s) who discriminated Against You:
Your Address (Street No., P.O. Box, Etc.):		Location and Position of Person (if known):
Your City, State, Zip:		City, State, Zip of Alleged Incident:
Discrimination occurred because of (Circle all that apply): Race/Color Sex Disability Age National Origin Income Status 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):		
Section II.		
Are you filing this complaint on your own behalf?	Yes	No
*If you answered yes to this question, skip to Section III.		
If not, please supply the name and relationship of the person for whom you are filing this complaint:		

Please explain why you are filing for a third party:				
Please confirm that you have obtained the permission of the aggrieved party to file a complaint on their behalf:		Yes	No	
Section III.				
Have you previously filed a complaint with this Agency?:				
Have you filed this complaint with any other Federal, State, or local agency? If yes, please name said agency and briefly describe the incident:				
Signature:			Date:	
Please return this form to: Keefe P. Carney Title VI & ADA Coordinator Acadiana Metropolitan Planning Organization 101 Jefferson Street Lafayette, LA 70501			Phone: 337-806-9371	
Accessible Format Requirements for this Form?	Large Print		Audio Tape	
	TDD		Other	

This form will be printed and distributed to reflect the name and contact information of the current Title VI & ADA Coordinator.

Appendix H – Title VI Training Opportunities

Training Completed

FTA Training Presentations:

Title VI Overview

Service Equity

Fare Equity



