Federal Transit Administration Title VI Program Lafayette Council on Aging

July, 15, 2019

July 2019 Page 1 of 23

Title VI Plan Table of Contents

The Lafayette Council on Aging Title VI plan includes the following elements:

- 1. Plan Approval and Revision Log
- 2. Policy Statement
- 3. Notice to the Public
- 4. Complaint Procedure
- 5. Complaint Form
- 6. List of transit related Title VI Investigations, Complaints and Lawsuits
- 7. Public Participation Plan
- 8. Language Assistance Plan
- 9. Minority Representation Table and Description
- 10. Providing Assistance to and Monitoring Subrecipients
- 11. Title VI Equity Analysis
- 12. MPO Requirements

Section 1: Title VI Plan Approval

July 2019 Page 2 of 23

Title VI Plan Adopted on:	July 2019 July 2019
Adopted by:	Name of Board or appropriate governing entity or officials
Signature(s):	
	Adopted on: Adopted by:

Include documentation to show approval (i.e., minutes, resolutions, ordinance, etc.)

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

July 2019 Page **3** of **23**

Policy Statement

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

July 2019 Page 4 of 23

TITLE VI Notice to the Public

The Lafayette Council on Aging's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

THE Lafayette Council on Aging

- ✓ The Lafayette Council on Aging operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Lafayette Council on Aging.
- ✓ For more information on the Lafayette Council on Aging's civil rights program, the procedures to file a complaint, or to file a complaint contact 337-262-5990 TTY 800-262-5990); email coadirector@lafcoa.org. ; or visit our administrative office at 160 Industrial pkw, Lafayette, Louisiana 70508. For more information, visit www.lafa-coa.org
- ✓ A complaint may also be filed directly with the:

Louisiana Department of Transportation and Development, Attn: Jamie Ainsworth, 1201 Capitol Access Road, Baton Rouge, LA 70804 or

Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

✓ If information is needed in another language, contact XXX-XXXX.

FYI: This statement should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold

The Lafayette Council on Aging Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

July 2019 Page **5** of **23**

Notificación al público de derechos bajo el título VI

- El Lafayette Council on Aging opera sus programas y servicios sin distinction de raza, color y origen nacional, segun el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Lafayette Council on Aging.
- Para obtener más información sobre el programa de derechos civiles de Lafayette Council on Aging, o para obtener más información sobre los procedimientos para presenter una queja llame al 337-262-5990, coadirector@lafcoa.org o visite nuestra oficina administrativa en 160 Industrial Parkway, Lafayette, LA 70508.
- Un demandante puede presenter una queja directamente a la el Departmet de Transporte del estado de Louisiana, llame al (225) 379-3055. Email Jamie.ainsworth@la.gov,
- Un demandante puede presenter una queja directamente a la Administración Federal de tránsito, Oficina de Derechos Civiles, Atención: Coordinadora del Programa Título VI, edificio este, 5 piso-TCR, 1200 New Jersey Ave., se Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 337-262-5990.

July 2019 Page **6** of **23**

Section 4: Title VI / ADA Complaint Procedure

he Lafayette Council on Aging's Title VI / ADA Complaint Procedure is made available in the following location	ns:
☐ Agency website, if available: www.laf-coa.org	
☐ 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 or disability by the **Lafayette Council on Aging** may file a Title VI/ ADA complaint by completing and submitting the agency's Title VI/ ADA Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the Lafayette Council on Aging 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
- 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 Lafayette Council on Aging will review it to determine if our office has jurisdiction. (A copy of each Title VI complaint received will be forwarded to the Louisiana Department of Transportation and Development within ten (10) calendar days of receipt.) The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Lafayette Council on Aging has 45 days to investigate the complaint. If more information is needed to resolve the case, the Lafayette Council on Aging may contact the complainant.

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).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A <u>letter of finding (LOF)</u> 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 letter of finding to do so. A person may also file a complaint directly with the: Louisiana Department of Transportation, Attn: Jamie Ainsworth, 1201 Capitol Access Road, Baton Rouge, LA 70804, or Federal Transit Administration, Office of Cívil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

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.

If information is needed in another language, then contact 337-262-5990.

July 2019 Page **7** of **23**

Procedimiento de Queja Titulo VI / ADA

El fonnulario de queja del Titulo VI / ADA del Lafayette Council on Aging esta disponible en las siguientes ubicaciones:

- Pagina web de la agencia
- Copia impresa localizada en la oficina central

Cualquier individo, grupo de individuos o entidad que crea que ha sido objeto de discriminacion por motivos de raza, color, nacionalidad o discapacidad por el Lafayette Council on Aging puede presentar una queja del Titulo VI / ADA al completar y enviar el fonnulario de queja del Titulo VI / ADA correspondiente a la agencia. Este decumento debeni de ser enviado a la direccion indicada en el fonnulario de queja.

Cualquier individuo que haya presentado una queja o participle en la investigacion de alguna queja no debera ser sujeto a ninguna fonna de intimidacion o represalias. Aquel individuo que considere que ha sido sujeto de intimidacion o de represalias puede llenar un formulario de queja para represalias siguiendo el mismo procedimiento que para una queja de descriminacion.

Esta queja debera ser presentada a traves de la Oficina de Programas de Cumplimiento del Lafayette Council on Aging en un periodo de no mas de 180 dias despues de lo siguiente:

- 1.- La fecha del presunto acto de discriminacion; o
- 2.- La fecha en la que la persona (s) se percataron del presunto acto de discriminacion; o
- 3.- Cuando se ha detectado que el acto de discriminación se ha convertido en una conducta repetitiva. En estos casos se incluira la fecha del ultimo acontecimiento.

Una vez que se reciba la queja, el / la Coordinador del Titulo VI / ADA del Lafayette Council on Aging lo revisara para detenninar si nuestra oficina tiene jurisdiccion. El demandantete recibira una carta de notificacion en la cual se le hara saber si la queja sera investigada por nuestra oficina.

Ell La coordinador del Titulo VI / ADA del Lafayette Council on Aging tendra 45 dias para investigar la queja. Si se necesita mas infonnacion para resolver el caso, el (la) Coordinador (a) del Titulo VI / ADA puedria contactar al demandante.

Despues de que el la Coordinador del Titulo VI / ADA revise la queja, emitira una de dos (2) cartas al demandante; una carta de cierre o una carta de hallazgo.

- Una <u>carta de cierre</u> resumiendo las alegaciones del caso en la cual indicara que no hubo una violacion del Titulo VI / ADA y por tal motivo el caso sera cerrado.
- Una <u>carta de hallazgo</u> resumiendo las alegaciones y las entrevistas sobre el supuesto incidente en esta misma carta se le explicara al demandante si se llevara a cabo alguna accion disciplinaria, entrenamiento adicional al personal o se tomara alguna otra accion necesaria.

Si el demandante desea apelar la decision, el tendra 180 dias despues de la fecha marcada en la carta de cierre ode la carta de hallazgo para hacerlo. Ell La Coordinador, Jamie Ainsworth (225)379-3055, del Titulo VII ADA analizara los hechos del caso y emitira su conclusion al apelante en un periodo de 60 dias despues de haber recibido la apelacion.

July 2019 Page **8** of **23**

Section 5: Title VI / ADA Complaint Form

The Lafayette Council on Agir	ng's Title VI / ADA Complaint P	rocedure is ma	ade available in	the follo	owing locations:
☐ Agency website, if ava	ilable: www.laf-coa.org				
☐ Hard copy in the centra	_				
☐ Agency Title VI Plan					
Section I:	S. 1 T. L. 1 S. 1 S. 1 S. 1 S. 1			S at large	18Y-1008 4-5
Name:					
Address:					
Telephone (Home):		Telephone ((Work):		
Email Address:					
Accessible Format	Large Print		Audio Tape		1
Requirements?	TDD		Other		
Section II:		SAME.	15 525		
Are you filing this complaint on y	our own behalf?		Yes*	N	lo
*If you answered "yes" to this qu	estion, go to Section III.		71	d d	
If not, please supply the name a are complaining:	and relationship of the person	for whom you			
Please explain why you have file	ed for a third party:				
	. 30	-			
Please confirm that you have ob	tained the permission of the as	ariouad partu	Yes		No
if you are filing on behalf of a thin		gneveu party	168	- 1'	No
Section III:		10 11 11			
I believe the discrimination I exp	erienced was based on (check	all that apply):			
[] Race [] Co	·	[] National Or		[1	Disability
Date of Alleged Discrimination (N		[]	.9		2.cab.ii.y
Explain as clearly as possible wh who were involved. Include the n as well as names and contact inf	ame and contact information of	the person(s)	who discriminat	ed again	ist you (if known)
y					
Section IV					
Have you previously filed a Title	VI 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?

July 2019

[] Yes	[] No	
If yes, check all that a	pply:	
[] Federal Agency:		
[] State Court		[] Local Agency
Please provide informa	ation about a contact perso	on at the agency/court where the complaint was filed.
Name:		
Title:	U 14	
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency comp	plaint is against:	
Contact person:		
Title:		
Telephone number:		
You may attach any write		ormation that you think is relevant to your complaint.
Signature		Date

If information is needed in another language, contact 337-262-5990.

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

(Lafayette Council on Aging , 160 Industrial Parkway, Lafayette, Louisiana 70508)

July 2019

Formato de Reciamo del Titulo VI delLafayetto	Council on Aging
Sección I:	
Nombre:	
Dirección:	- <u>-</u> :
Teléfono (Casa/Celular):	Teléfono (Trabajo):
Dirección de correo electrónico:	
Sección II:	
¿Está usted presentando esta queja en su propio nombre:	Sí 🗆 No 🗆
* Si usted contestó "sí" a esta pregunta, pase a la Sección III.	
Si su respuesta es "no", por favor escribe el nombre y la relación de la persona que está presentando la queja en contra:	Nombre:Relación:
siguiente espacio:	
¿Se ha obtenido el permiso de la parte perjudicada, si usted está pre tercero:	esentando en nombre de un Sí No
Sección III:	
Creo que la discriminación que experimenté fue basado en (marque ☐ Raza ☐ Color ☐ Origen Nacional	todo lo que corresponda):
Fecha de la discriminación alegada (Mes, Día, Año):	Date:
Explique, lo más claramente posible, lo que sucedió y porqué usted Describe todas las personas quien estuvieron involucradas. Incluye de contacto de la persona (s) que discriminó (si se conoce), así com de contacto de cualquier testigo. Si necesita más espacio, adjunte ho	el nombre y la información o los nombres e información

July 2019 Page **11** of **23**

Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal ederal o estatal? No II In caso afirmativo, marque el nombre de todas las que correspondan: Agencia Federal: Tribunal Federal: Tribunal Estatal: Agencia local: Firvanse proporcionar información acerca de una persona de contacto en la corte / entidad donde se presentó la queja. Nombre: Tritulo: Agencia: Dirección: Teléfono:	Ha previamente presentado una queja del Títul Aging?	lo VI con el Sí □	No 🗆	_ Lafayette Council on
in caso afirmativo, marque el nombre de todas las que correspondan: Agencia Federal:	Sección V			
Agencia Federal:	¿Ha presentado esta queja con cualquier otro t federal o estatal?	federal, estata		<u> </u>
Tribunal Federal:	En caso afirmativo, marque el nombre de todas	s las que corre	spondan:	
Agencia Estatal:	□ Agencia Federal:	2		
Tribunal Estatal:	□ Tribunal Federal:	_		
Agencia local: Sirvanse proporcionar información acerca de una persona de contacto en la corte / entidad donde se presentó la queja. Nombre: Título: Agencia: Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	∃ Agencia Estatal:			
en la corte / entidad donde se presentó la queja. Nombre: Título: Agencia: Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto:	□ Tribunal Estatal:	_		
en la corte / entidad donde se presentó la queja. Nombre: Título: Agencia: Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	□ Agencia local:			
en la corte / entidad donde se presentó la queja. Nombre: Título: Agencia: Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:		na persona de	contacto	
Agencia: Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:		•		
Dirección: Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	Título:	_		
Teléfono: Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	Agencia:	_		
Sección VI Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	Dirección:			
Nombre de la agencia/companía de queja es contra: Persona de contacto: Título:	Teléfono:	i.		
Persona de contacto:	Sección VI			
Título:	Nombre de la agencia/companía de queja es	contra:		
	Persona de contacto:			
	Título:			

July 2019 Page **12** of **23**

Firma:
Fecha:
Denferren envis esta ferrarilaria en mansana en la discoción indicada vata abaia.
Por favor, envíe este formulario en persona en la dirección indicada más abajo:
Lafayette Council on Aging Katherin Boudreaux, Executive Director
160 Industrial parkway, Lafayette, LA 70508

July 2019 Page **13** of **23**

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Lafayette Council on Aging** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check	One:
	There have been <u>no</u> investigations, complaint and/or lawsuits filed against us since the last plan submission.
	There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

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

July 2019 Page **14** of **23**

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Lafayette Council on Aging** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the **Lafayette Council on Aging** since the last Title VI Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below.

Event Date	Lafayette Council on Aging Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
	8-			

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the Lafayette Council on Aging is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The Lafayette Council on Aging's Language Assistance Plan includes the following elements:

- Item #1: The results of the Four Factor Analysis, including a description of the LEP population(s), served.
- Item #2: A description of how language assistance services are provided by language
- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the Lafayette Council on Aging has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the Lafayette Council on Aging's will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program.: Identifies and assesses the frequency Lafayette Council on Aging's staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

July 2019 Page **16** of **23**

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

This section discusses how the **Lafayette Council on Aging's** program and services impact the lives of person's within the community. The **Lafayette Council on Aging** will specify the community organizations that serve LEP persons, if available.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low cost methods the Lafayette Council on Aging uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Item #1 - Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

The Lafayette Council on Aging's staff reviewed the Census 2010 reports and determined that XXXX (XX%) persons in the *Parish* speak a language other than English. In *Parish*, of the XXXXX persons with limited English proficiency, XXXX (XX%) speak Spanish.

Factor 2: The frequency with which LEP persons come into contact with the program.

Lafayette Council on Aging assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Lafayette Council on Aging provides approximately XXXXXXX passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the LADOTD, if needed, to ensure the individual receives access to the transit services.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

All of Lafayette Council on Aging's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Lafayette Council on Aging is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the Lafayette Council on Aging will strive to provide alternative but meaningfully accessibility. Moreover, the Lafayette Council on Aging continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

July 2019 Page **17** of **23**

The Lafayette Council on Aging makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Lafayette Council on Aging will use available resources, both internal and external to accommodate reasonable requests for translations.

Item #2 – Description of how Language Assistance Services are Provided, by Language

The Lafayette Council on Aging has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The Lafayette Council on Aging has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- A list of web based translation services can be provided by contracting the Human Resources
 Department.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Lafayette Council on Aging's language assistance measures.

Lafayette Council on Aging provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.

Item # 4 - Description of how the Language Assistance Plan is Monitored and Updated

Lafayette Council on Aging will continue to update the LEP plan as required by U.S. DOT. At a minimum, the plan

will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the 2020 U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the Lafayette Council on Aging service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Lafayette Council on Aging's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Lafayette Council on Aging has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Lafayette Council on Aging's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Lafayette Council on Aging staff:

- Information on the Lafayette Council on Aging Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Lafayette Council on Aging shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with XXX to obtain translators. The agency will also utilize web based translator programs if available.

If you need help with English, please call xxx-xxx-xxxx.

Lafayette Council on Aging proporcionará comunicación para jinetes competentes inglés limitados para asegurarles igualdad de oportunidades para beneficiarse de los servicios. Miembros de la familia o amigos de jinetes habilidades inglesas limitadas no se utilizará como traductores a menos que pedido específicamente por ese individuo. Han establecido acuerdos con la Agencia para obtener traductores. La agencia también utiliza programas de traductor basado en web si está disponible.

Si usted necesita ayuda con el inglés, por favor llame 337-262-5990

July 2019 Page **19** of **23**

"I Speak" Language Identification Card

Mark this Box if you speak	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果 说中 国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
=	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिहिनत करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website http://www.lep.gov/ISpeakCards2004.pdf

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Guidance: Elected transit-related board, committee, or council, do not need to complete the table below blank, and in section B write that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population						

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, the XXXXXXX will make every effort to encourage minority participation on the boards)

July 2019 Page **21** of **23**

Section 10: Providing Assistance to and Monitoring Subrecipients

 $\ensuremath{\boxtimes}$ No, the agency does not have subrecipients.

1. Does agency provide funding to subrecipients?

	Lafayette Council on Aging monitors subrecipients using the following process:	
	 Lafayette Council on Aging uses the following process for ensuring all subrec complying with the general reporting requirements of FTA C4702.1B: (doc process here) 	
	Lafayette Council on Aging collects Title VI programs from the subrecipients li and reviews programs for compliance by (list the process here)	sted above
tion 11: Tit	le VI Equity Analysis	
1. Has th	ne agency built a facility? (check a response below)	
⊠ No, the	e agency has not built a facility.	
various sit	e agency has built a facility and completed a Title VI equity analysis to compare the equity ing alternatives, and the analysis must occur before the selection of the preferred site. the TVI plan a copy of the Title VI equity analysis.)	-
	1	
tion 12: Re	quirements for Metropolitan Planning Organizations (MPOs)	
	quirements for Metropolitan Planning Organizations (MPOs)	
	quirements for Metropolitan Planning Organizations (MPOs) NA complete Part Three; in addition to the requirements specified in Part One.	
MPOs must 1. Did th	quirements for Metropolitan Planning Organizations (MPOs) NA complete Part Three; in addition to the requirements specified in Part One.	Status
MPOs must 1. Did th	quirements for Metropolitan Planning Organizations (MPOs) NA complete Part Three; in addition to the requirements specified in Part One.	Status
MPOs must 1. Did th	quirements for Metropolitan Planning Organizations (MPOs) NA complete Part Three; in addition to the requirements specified in Part One. e rements (Ref: FTA Circular 4702.18 Chapter VI) Does the plan contain a demographic profile of the metropolitan area that includes	
MPOs must 1. Did th MPO Requir 1)	quirements for Metropolitan Planning Organizations (MPOs) NA complete Part Three; in addition to the requirements specified in Part One. e rements (Ref: FTA Circular 4702.18 Chapter VI) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate? A description of the procedures by which the mobility needs of minority populations are	□Y □N

July 2019 Page **22** of **23**

July 2019 Page **23** of **23**