

Federal Transit Administration
Non-Discrimination Program
St. Mary Community Action Agency

June 30, 2022

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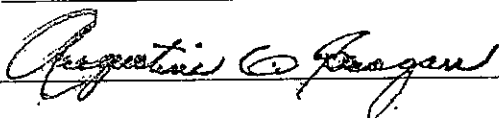
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Section 1: Title VI Plan Approval

Title VI Plan March 6, 2020

Adopted on: _____

Adopted by: St. Mary-Vermilion CAA Board of Directors

Signature(s): 

Print Name of signature above Augustine Grogan

Print Title of signature above Board President

Date SIGNED: 3-6-2020

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Title VI Policy Statement
Policy Statement

The **St. Mary-Vermilion Community Action Agency** assures that no person shall on the grounds of race, color, or national origin as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs or activities. **St. Mary-Vermilion Community Action Agency** assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not (inclusive of additional Title VI Authorities and citations).

The Civil Rights Restoration Act of 1987, broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractor/consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [S.557] March 22, 1988.)

St. Mary-Vermilion Community Action Agency will be responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 23 Code of Federal Regulation, (CFR) 200 and 49 Code of Federal Regulation 21.

Almetra J. Franklin

3-6-2020

Agency Director Name

Date

Title: Chief Executive Officer

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color or national origin by the **St. Mary-Vermilion Community Action Agency** may file a Title VI complaint by submitting the agency's Title VI / ADA Complaint Form.

For all Title VI matters, please contact:

Almetra J. Franklin

1407 Barrow St., Franklin, LA 70538

(337)828-5703, afrank6333@aol.com

TITLE VI Notice to the Public

The **St. Mary-Vermilion Community Action Agency** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

St. Mary-Vermilion Community Action Agency

- ✓ The **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** and should be filed within 180 days of date of alleged discrimination.
- ✓ For more information on the **St. Mary-Vermilion Community Action Agency** civil rights program, the procedures to file a complaint, or to file a complaint contact 337-828-5703, (TTY 800-543-2099); email afrank6333@aol.com; or visit our administrative office at 1407 Barrow St., Franklin, LA 70538.
- ✓ A complaint may also be filed directly with the:

Louisiana Department of Transportation and Development, Attn: Cynthia Douglas, 1201 Capitol Access Road, Baton Rouge, LA 70804 or (225)379-1923

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 337-828-5703.

The **St. Mary-Vermilion Community Action Agency** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

Notificación al público de derechos bajo el título VI

- El St. Mary-Vermilion Community Action Agency opera sus programas y servicios sin distinción de raza, color y origen nacional, según 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 St. Mary-Vermilion Community Action Agency.
- Para obtener más información sobre el programa de derechos civiles de St. Mary Community Action Agency/Vermilion, o para obtener más información sobre los procedimientos para presentar una queja llame al 337-828-5703, afrank6333@aol.com o visite nuestra oficina administrativa en 1407 Barrow St., Franklin, LA 70538.
- Un demandante puede presentar una queja directamente a la el Departmet de Transporte del estado de Louisiana, llame al (225) 379-1923. Email Cynthia.douglas@la.gov,
- Un demandante puede presentar 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 337-828-5703.

Section 4: Title VI / ADA Complaint Procedure

The **St. Mary-Vermillion Community Action Agency's** Title VI / ADA Complaint Procedure is made available in the following locations:

- x Agency website, if available: stmarycaa.org
- x Hard copy in the central office
- x 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 **St. Mary-Vermillion Community Action Agency** may file a Title VI/ ADA complaint by completing and submitting the agency's Title VI/ ADA Complaint Form. File initial complaint with Almetra J. Franklin, Chief Executive Officer at **St. Mary-Vermillion Community Action Agency**.

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 **St. Mary-Vermillion Community Action Agency** no later than 180 days after the following:

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

Once the complaint is received, the **St. Mary-Vermillion Community Action Agency** 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 **St. Mary-Vermillion Community Action Agency** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **St. Mary-Vermillion Community Action Agency** 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 closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 180 days after the date of the letter or the letter of finding to do so. A person may also file a complaint directly with the: Louisiana Department of Transportation, Attn: Cynthia Douglas, 1201 Capitol Access Road, Baton Rouge, LA 70804.

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 337-828-5703.

Procedimiento de Queja Titulo VI / ADA

El formulario de queja del Titulo VI / ADA del St. Mary-Vermilion Community Action Agency esta disponible en las siguientes ubicaciones:

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

Cualquier individuo, grupo de individuos o entidad que crea que ha sido objeto de discriminacion por motivos de raza, color, nacionalidad o discapacidad por el St. Mary-Vermilion Community Action Agency puede presentar una queja del Titulo VI / ADA al completar y enviar el formulario de queja del Titulo VI / ADA correspondiente a la agencia. Este documento debeni de ser enviado a la direccion indicada en el formulario de queja. Presente la queja inicial con Almetra J. Franklin, CEO en St. Mary-Vermilion Community Action Agency.

Cualquier individuo que haya presentado una queja o participe en la investigacion de alguna queja no debera ser sujeto a ninguna forma 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 St. Mary-Vermilion Community Action Agency 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 discriminacion se ha convertido en una conducta repetitiva. En estos casos se incluire la fecha del ultimo acontecimiento.

Una vez que se reciba la queja, el / la Coordinador del Titulo VI / ADA del St. Mary-Vermilion Community Action Agency lo revisara para detenninar si nuestra oficina tiene jurisdiccion. El demandante recibira una carta de notificacion en la cual se le hara saber si la queja sera investigada por nuestra oficina.

El / La coordinador del Titulo VI / ADA del St. Mary-Vermilion Community Action Agency tendra 45 dias para investigar la queja. Si se necesita mas informacion para resolver el caso, el (la) Coordinador (a) del Titulo VI / ADA podria 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 carta de cierre 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 carta de hallazgo 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 o de la carta de hallazgo para hacerlo. El / La Coordinador, Jamie Ainsworth (225)379-3055, del Titulo VI / ADA analizara los hechos del caso y emitira su conclusion al apelante en un periodo de 60 dias despues de haber recibido la apelacion.

Section 5: Title VI / ADA Complaint Form

The St. Mary-Vermilion Community Action Agency Title VI / ADA Complaint Procedure is made available in the following locations:

- ☒ Agency website, if available: stmarycaa.org
- ☒ Hard copy in the central office
- ☒ Agency Title VI Plan

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Requirements?	Format	Large Print	Audio Tape	
		TDD	Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
☐ Race ☐ Color ☐ National Origin ☐ Disability				
Date of Alleged Discrimination (Month, Day, Year) _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
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?		
☐ Yes ☐ No		
If yes, check all that apply:		
☐ Federal Agency: _____		
☐ Federal Court _____		
☐ State Court _____		
☐ State Agency _____		
☐ Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
Section VI		
Name of agency complaint is against: _____		
Contact person: _____		
Title: _____		
Telephone number: _____		

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

Signature and date required below

Signature

Date

If information is needed in another language, contact 337-828-5703.

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

St. Mary-Vermillion Community Action Agency, 1407 Barrow St., Franklin, LA 70538

Formato de Reclamo del Título VI o ADA del St. Mary-Vermilion Community Action Agency

Sección I:

Nombre: _____

Dirección: _____

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: _____

Si usted está presentando una queja de parte de otra persona, por favor, explica porqué en el siguiente espacio:

¿Se ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero: **Sí** ☐ **No** ☐

Sección III:

Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):

☐ **Raza** ☐ **Color** ☐ **Origen Nacional**

Fecha de la discriminación alegada (Mes, Día, Año): _____

Date: _____

Explique, lo más claramente posible, lo que sucedió y porqué usted cree que fue discriminado. Describe todas las personas quien estuvieron involucradas. Incluye el nombre y la información de contacto de la persona (s) que discriminó (si se conoce), así como los nombres e información de contacto de cualquier testigo. Si necesita más espacio, adjunte hojas adicionales a este formulario:

Sección IV

Ha previamente presentado una queja del Título VI con el St. Mary-Vermilion Community Action Agency
Sí ☐ No ☐

Sección V

¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal? Sí ☐ No ☐

En caso afirmativo, marque el nombre de todas las que correspondan:

- ☐ Agencia Federal: _____
- ☐ Tribunal Federal: _____
- ☐ Agencia Estatal: _____
- ☐ Tribunal Estatal: _____
- ☐ Agencia local : _____

Sírvanse 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/compañía de queja es contra: _____

Persona de contacto: _____

Título: _____

Teléfono: _____

Firma: _____

Fecha: _____

Por favor, envíe este formulario en persona en la dirección indicada más abajo:

St. Mary-Vermilion Community Action Agency
1407 Barrow St., Franklin, LA 70538
Almetra J. Franklin, CEO

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

The St. Mary-Vermilion Community Action Agency maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

☒ There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

☐ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **St. Mary-Vermilion Community Action Agency** 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.

Public Outreach Activities

The public outreach and involvement activities conducted by the **St. Mary-Vermilion Community Action Agency** since the last Title VI Program submission are summarized in the table below.

Event Date	St. Mary-Vermilion Community Action Agency Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
10-24-2019	Delores Stewart	Resource Fair	Social Media, Flyers	
	Andrea Broussard			
	Tishoma Loston			

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus service;
- (b) Participation in public meetings;
- (c) Customer service interactions;
- (d) Ridership surveys;

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 **St. Mary-Vermilion Community Action Agency** program and services impact the lives of person's within the community. The **St. Mary-Vermilion Community Action Agency** 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 **St. Mary-Vermilion Community Action Agency** 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 St. Mary-Vermilion Agency's staff reviewed the American Community Survey data <https://www.census.gov/programs-surveys/acs> and determined that 7462 (17.1%) of the persons in the **Vermilion Parish** speak a language other than English. In **Vermilion Parish**, of the 7462 (17.1%) persons with limited English proficiency, 718 (2.1%) speak Spanish
https://data.census.gov/cedsci/table?q=United%20States&table=DP05&tid=ACSST1Y2017.S1602&g=0100000US_0400000US22.050000&lastDisplayedRow=29&vintage=2017&layer=state&cid=DP05_0001E&t=Language%20Spoken%20at%20Home&hidePreview=true

Label	Vermilion Parish,	Vermilion Parish	Vermilion Parish	Vermilion Parish / Percent of specified language
	Total / Estimate	Total / Margin of Error	Percent / Estimate	speakers Speak English only or speak English "very well" / Estimate
Population 5 years and over	55761	91	(X)	(x)
Speak only English	46203	578	82.9	(X)
Speak a language other than English	9558	579	17.1	7462
SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	1150	288	2.1	718
5 to 17 years old	250	115	0.4	250
18 to 64 years old	821	245	1.5	426
65 years old and over	79	53	0.1	42
Other Indo-European languages	7209	518	12.9	6358
5 to 17 years old	73	78	0.1	73
18 to 64 years old	3263	417	5.9	2976

65 years old and over	3873	289	6.9	3309
Asian and Pacific Island languages	1167	125	2.1	354
5 to 17 years old	164	74	0.3	107
18 to 64 years old	808	84	1.4	216
65 years old and over	195	62	0.3	31
Other languages	32	43	0.1	32
5 to 17 years old	0	29	0	0
18 to 64 years old	32	43	0.1	32
65 years old and over	0	29	0	0
CITIZENS 18 YEARS AND OVER				
All citizens 18 years old and over	43568	267	(X)	42163
Speak only English	35284	550	81	(X)
Speak a language other than English	8284	580	19	6879
Spanish	537	183	1.2	404
Other languages	7747	544	17.8	6475

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

St. Mary-Vermilion Community Action Agency assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. St. Mary-Vermilion Community Action Agency provides approximately 5793 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 St. Mary-Vermilion Action Agency's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The St. Mary-Vermilion Community Action Agency 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 St. Mary-Vermilion Community Action Agency will strive to provide alternative but meaningfully accessibility. Moreover, the St. Mary-Vermilion Community Action Agency 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.

The St. Mary-Vermilion Community Action Agency makes every effort to make its programs, services, and activities, accessible to LEP individuals. The St. Mary-Vermilion Community Action Agency 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 St. Mary-Vermilion Community Action Agency 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 St. Mary-Vermilion Community Action Agency 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.

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 St. Mary-Vermilion Community Action Agency's language assistance measures, St. Mary-Vermilion Community Action Agency provides the following:

- Title VI Program including the Language Assistance Plan is made available in the 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

St. Mary-Vermilion Community Action Agency 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 St. Mary-Vermilion Community Action Agency 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 St. Mary-Vermilion Community Action Agency's financial resources are sufficient to fund language assistance resources needed.
- Determine whether St. Mary-Vermilion Community Action Agency has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning St. Mary-Vermilion Community Action Agency'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 St. Mary-Vermilion Community Action Agency's staff:

- Information on the St. Mary-Vermilion Community Action Agency's 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.
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

St. Mary-Vermilion Community Action Agency 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 Language Line Solutions (1-888-808-9008) to obtain translators. The agency will also utilize web based translator programs if available.

If you need help with English, please call 337-828-5703.

St. Mary-Vermilion Community Action Agency 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 337-828-5703.

***"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 ñaunh daáu vaø oã naøy neáu quyù vô bieát ñoïc vaø noùi ñoõic Vieät Ngõõ.	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 चिह्नित 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

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	4		17			

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, the St. Mary-Vermilion Community Action Agency will make every effort to encourage minority participation on the board. St. Mary-Vermilion Community Action Agency recruits members of diversity by putting out flyers in the minority communities.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

☒ No, the agency does not have subrecipients.

☐ Yes. If yes, list the subrecipient names: (list other agency names here)

St. Mary-Vermilion Community Action Agency monitors subrecipients using the following process:

1. St. Mary-Vermilion Community Action Agency uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA C4702.1B: (document the process here)
2. St. Mary-Vermilion Community Action Agency collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 11: Title VI Equity Analysis

1. Has the agency built a facility? (check a response below)

☒ No, the agency has not built a facility.

☐ Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the TVI plan a copy of the Title VI equity analysis.)

Section 12: Requirements for Metropolitan Planning Organizations (MPOs)

☒ NA

All MPOs must complete Part Three; in addition to the requirements specified in Part One.

1. Did the

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	☐ Y ☐ N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	☐ Y ☐ N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	☐ Y ☐ N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	☐ Y ☐ N
Comments:	