

Tangipahoa Parish, La.  
Transit Title VI Program  
2019-2021

Tangipahoa Parish Government  
P.O. Box 215  
Amite, La. 70422-0215  
Phone (985) 748-3211  
Website: [www.tangipahoa.org](http://www.tangipahoa.org)

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## Introduction

In compliance with Title VI of the Civil Rights Act of 1964, the Tangipahoa Parish Government, doing business as Tangipahoa Parish Government, operating its transit program with a third-party non-profit organization, administers all of its programs and provides public transportation services without regard to race, color, or national origin. Tangipahoa Parish is committed to providing non-discriminatory service that is open to the general public. Tangipahoa Parish is committed to ensuring that no person is excluded from access to its transit services on the basis of race, color, or national origin. This document was developed to guide Tangipahoa Parish in the administration and management of its Title VI program. For more information, please contact Tangipahoa Parish Government at (985) 748-3211 or email: [personnel@tangipahoa.org](mailto:personnel@tangipahoa.org).

## Signed Policy Statement

A policy statement signed by the Parish President, assuring Tangipahoa Parish is in compliance with Title VI of the Civil Rights Act of 1964 can be found attached hereto.

## Title VI Complaint Procedures

Tangipahoa Parish has a standard process for investigation of all complaints. Anyone who believes that they have been subject to an unlawful discriminatory practice by Tangipahoa Parish Government has the right to file a complaint with the Parish of Tangipahoa. Anyone who has a discrimination complaint should call Tangipahoa Parish at (985) 748-3211 or email: [vbaker@tangipahoa.org](mailto:vbaker@tangipahoa.org) to explain the concern, using the appropriate forms provided by the Parish. Tangipahoa Parish's appropriate Title VI official will respond and request additional information with the goal of obtaining an appropriate resolution to the issue.

Members of the public may file a signed, written complaint within 180 days from the date of the alleged discrimination. At a minimum, the complaint should include the following information:

- Name, mailing address, and contact information (i.e., telephone number, email address, etc.)
- How, when, where, and why complainant alleges they were discriminated against.
- Names and contact information of any witnesses.
- Any other significant information.

Formal complaints shall be mailed to the attention of the person named below with the Parish of Tangipahoa, and at the following address:

Virginia Baker, Personnel Director  
Tangipahoa Parish Government  
P.O. Box 215  
Amite, La. 70422-0215

Full procedures for filing a complaint or allegation and a written complaint form, and Tangipahoa Parish's procedures for investigating complaints, can be found in Attachment B, included hereto.

## Record of Title VI Investigations, Complaints, or Lawsuits

Tangipahoa Parish has not received any formal Title VI complaints during the current reporting period and is not aware of an active investigations, lawsuits, or complaints naming Tangipahoa Parish or its sub-recipients that allege discrimination on the basis of race, color, or national origin.

## Tangipahoa Parish Transit Limited English Proficiency (LEP) Plan

A full copy of Tangipahoa Parish Transit’s outreach plan for individuals with limited English proficiency can be found in Attachment C, attached hereto.

## Notification of Tangipahoa Parish Transit Title VI Obligations

Tangipahoa Parish Transit publicizes its Title VI program by posting its commitment on its website and in its headquarters public building, with its commitment to providing services without regard to race, color, or national origin. The Tangipahoa Parish Title VI Public Notice, shown below, is posted in all Tangipahoa Parish public transit buses and Tangipahoa Parish Transit facilities (operated by a third party).

**Tangipahoa Parish Government**  
**Title VI Public Notice (shown in Spanish and in English)**

In compliance with Title VI of the Civil Rights Act of 1964, Tangipahoa Parish operates all of its programs and provides public transportation services without regard to race, color, or national origin. Tangipahoa Parish is committed to providing non-discriminatory service that is open to the general public.

Anyone who believes that they have been subject to an unlawful discriminatory practice by Tangipahoa Parish, or its contracted third-party operators, has the right to file a complaint with the Parish of Tangipahoa. Anyone who has a discrimination complaint should call the Tangipahoa Parish Personnel Director at (985) 748-3211. Tangipahoa Parish will respond and request additional information with the goal of obtaining an appropriate resolution. Formal complaints should be in writing and mailed to: Virginia Baker, Personnel Director, P. O. Box 215, Amite, La. 70422-0215.

## Analysis of Construction Projects

Tangipahoa Parish Transit has undertaken no construction projects in relation to its transit program during the current reporting period and has none planned. However, any such project to be done will have a documented Categorical Exclusions or full Environmental Review Record from the Federal Transit Administration prior to the start of construction.

When a construction project is undertaken in the future, Tangipahoa Parish will comply with the DOT Order on Environmental Justice and will incorporate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects. The environmental justice analysis will identify any low-income and/or minority populations impacted by the project, and describe all adverse and/or positive effects of the project, both during and after construction, that would affect the

identified minority and low-income population. The analysis will also include mitigation and environmental enhancement actions incorporated into the project to address any adverse effects.

## Sub-recipient Oversight

Tangipahoa Parish has a responsibility to provide contractor oversight for its service contractors to ensure compliance with FTA regulations. The Tangipahoa Parish Voluntary Council on Aging (TVCOA) is the non-profit operations service contractor for Tangipahoa Parish's transit program, though not considered a sub-recipient. Monthly oversight meetings are held between Tangipahoa Parish and the Council on Aging that include a review of any complaints (Title VI or otherwise) and/or service issues. The same Council on Aging is the contractor for Tangipahoa Parish's demand-response service. At a minimum, monthly oversight meetings are held between Tangipahoa Parish and TVCOA that include a review of any complaints (Title VI or otherwise) and/or service issues. Tangipahoa Parish uses the same TVCOA sub-recipients to provide fixed-route service.

## Summary of Public Participation Efforts

Over the last reporting period, Tangipahoa Parish conducted or will conduct, the following public outreach and involvement activities:

- Public notice in new publications about the Civil Rights Plan and inviting public review and comment
- Posting of the Civil Rights Plan on the Parish website and inviting public review and comment
- Annual public notices to increase public awareness of the Civil Rights Plan and procedures
- Keeping the Plan available to the public at Parish offices

## Public Participation Plan

To promote inclusive public participation with all Tangipahoa Parish residents, but especially minorities and lower income populations, and for public participation, the Parish has adopted a Public citizen's Participation Plan, which is available to the public upon request or through review of the Parish website at [www.tangipahoa.org](http://www.tangipahoa.org).

## Fixed Route Service Standards and Policies

Tangipahoa Parish Transit operates fixed route bus service in the Hammond urbanized area less than 200,000 in population (close to 67,000 in population) and operates with less than 5 fixed route vehicles in peak service. A copy of Tangipahoa Parish Transit's required fixed route system-wide service standards and policies can be found in **Attachment D**, attached hereto. The fixed route service can be varied depending upon the agency budget and rider demand.

## Governing Body Review and Approval Documentation

The review and approval resolution of the governing body can be found in **Attachment E**. This document was reviewed by the Parish Council in open public session, and with notification to the public inviting their participation and attendance at the public meeting.

## Attachment A

### Tangipahoa Parish Transit Title VI Non-Discrimination Policy Statement

In compliance with Title VI of the Civil Rights Act of 1964, Tangipahoa Parish Government operates all of its programs and provides public transportation services without regard to race, color, or national origin. Tangipahoa Parish is committed to providing non-discriminatory service that is open to the general public. Tangipahoa Parish is committed to ensuring that no person is excluded from access to its transit services on the basis of race, color, or national origin. Also, under the Americans with Disabilities Act of 1990, Tangipahoa Parish shall not discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

Anyone who believes that they have been subject to an unlawful discriminatory practice by Tangipahoa Parish has the right to file a complaint with the Tangipahoa Parish Government. Anyone who has a discrimination complaint should call Tangipahoa Parish at (985) 748-3211, Personnel Director. Tangipahoa Parish will respond and request additional information with the goal of obtaining an appropriate resolution. Formal complaints must be in writing and mailed or emailed to: Virginia Baker, Personnel Director, P. O. Box 215, Amite, La. 70422-0215 or [vbaker@tangipahoa.org](mailto:vbaker@tangipahoa.org).

## Attachment B

### Tangipahoa Parish Government Discrimination Complaint Procedure

In compliance with Title VI of the Civil Rights Act of 1964, Tangipahoa Parish operates all of its programs and provides public transportation services without regard to race, color, national origin. Tangipahoa Parish is committed to providing non-discriminatory service that is open to the general public. Tangipahoa Parish is committed to ensuring that no person is excluded from access to its transit services on the basis of race, color, or national origin. Also, under the Americans with Disabilities Act of 1990, Tangipahoa Parish shall not discriminate against an individual with a physical or mental disability in connection with the provision of the public transportation service, or other Title VI-Civil Rights complaints relating to the Parish government.

1. Anyone who believes that they have been subject to an unlawful discriminatory practice by Tangipahoa Parish Government has the right to file a written complaint within 180 days from the date of the alleged discrimination. Anyone who has a discrimination complaint should call Tangipahoa Parish at (985) 748-3211 and ask to speak to the Personnel Director. Tangipahoa Parish will respond and request additional information with the goal of obtaining an appropriate resolution promptly.
2. Formal complaints must be in writing, signed by the complainant and/or the complainant's representative, and mailed or emailed to the following address: Virginia Baker, Personnel Director, P. O. Box 215, Amite, La. 70422-0215; vbaker@tangipahoa.org. Complainants must describe as accurately as possible all facts and circumstances surrounding the alleged discrimination and use the Parish's complaint form provided. The complaint shall be handled according to these investigative procedures.
3. For Transit related complaints, such will be referred also to the Transit Manager (at TVCOA) for review and action. The Transit Manager will review and investigate every complaint promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The investigation will identify and review all relevant documents, practices and procedures; and identify and interview persons with knowledge of the Title VI violation (the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity; or anyone with relevant information).
4. Upon completion of the investigation, the Transit Manager will complete a final written report for the Tangipahoa Parish Personnel Director, who will also make his/her own report. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial steps or actions to address the concern. For non-transit related complaints, the Personnel Director will prepare a written report on the complaint and the findings.
5. The Transit Manager and the Parish Personnel Director shall maintain a log of Title VI complaints received from this process to include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken by Tangipahoa Parish in response to the complaint. If the Personnel Director can not resolve the complaint with the complainant, the issue can be put on the agenda of the Parish Council for discussion.
6. A summary of the complaint and resolution will be included as part of the Title VI updates to the FTA and/or any other agency or auditor requesting such information.

# Tangipahoa Parish Title VI Complaint Form

In compliance with Title VI of the Civil Rights Act of 1964, the Tangipahoa Parish Government operates all of its programs and provides public transportation and other services without regard to race, color, or national origin. Tangipahoa Parish is committed to providing non-discriminatory service that is open to the general public. Anyone who believes that they have been subject to an unlawful discriminatory practice by Tangipahoa Parish has the right to file a Title VI complaint with the Parish of Tangipahoa. The complaint must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please call (985) 748-3211. The completed form must be sent to: Personnel Director, P. O. Box 215, Amite, La. 70422-0215 or vbaker@tangipahoa.org.

### **Person Filing Complaint:**

Name: \_\_\_\_\_  
                    First Name                    MI                    Last Name

Phone: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_      Alternate Phone: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Street Address: \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code: \_\_\_\_\_

Mail Address: \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Name(s) & Contact Information for person(s) discriminated against** *(if someone other than complainant):* \_\_\_\_\_

Phone: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_      Alternate Phone: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Mail Address: \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code: \_\_\_\_\_

*Describe the alleged discrimination incident as accurately as possible, including names, dates, and times. Provide the names of all Tangipahoa Parish or transit employees involved, if available. Explain what happened and who you believe was responsible. (Please use the back of this form if additional space is required.)* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*I affirm that I have read the above charge and that it is true to the best of my knowledge.*

Complainant's Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

## Attachment C

# Tangipahoa Parish Government Limited English Proficiency (LEP) Plan

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the Parish of Tangipahoa's responsibilities as a recipient of Federal financial assistance for the operation of its public transit system, as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive Federal funds, including the Parish of Tangipahoa, or those doing business as Tangipahoa Parish Transit Program, which receives Federal assistance through the Federal Transit Administration (FTA) and Louisiana Department of Transportation (LDOT).

Tangipahoa Parish is committed to ensuring that no person is excluded from access to its transit services on the basis of race, color, or national origin. This plan was developed to guide the Parish in its administration and management of LEP related activities.

### Plan Summary

Tangipahoa Parish and its sub-recipient third party provider, the Tangipahoa Parish Voluntary Council on Aging (TVCOL), the public transit service provided by the Parish of Tangipahoa, has developed this LEP plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by transit agency. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. The U.S. Census shows that between 1.6% - 2.6% of the Parish-wide population speaks a language other than English, with only 1.6%, or less than 1,913 persons speaking English less than well.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan TPT undertook the FTA's four-factor LEP analysis which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to be served by TPT.
2. The frequency with which LEP persons come in contact with TPT's services.
3. The nature and importance of TPT's services to the LEP population.
4. The resources available to TPT and overall cost to provide LEP assistance.

#### Four-Factor Analysis

1. Assessing the Number and Proportion of LEP Persons Likely to be served by the Tangipahoa Parish transit system.

#### US Census Data of the Service Area

Tangipahoa Parish and its sub-recipient Council on Aging provide transit service within the Tangipahoa Parish’s southern metropolitan area, with service in and around the communities of Hammond and Ponchatoula. The metropolitan planning services are provided by the New Orleans Regional Planning Commission (RPC). US Census data from the 2013-2017 American Community Survey (ACS) 5-year estimates were used to determine the LEP population concentrations in the Tangipahoa Parish metropolitan planning area; see numbers below.

The ACS tracks information for persons speaking another language to determine how well such populations speak English. For the purpose of this analysis, the population speaking another language and speaking English less than very well is considered to be an LEP population, and the primary “other” language is Spanish.

<b>Tangipahoa Parish, Louisiana</b>			
	Total Percent of specified language speakers	Estimate – speak English very well	Estimate – Speak English less than very well (LEP)
Population 5 years and over	119,570	98.4%	1.6% (LEP)*
Speak only English	98.4%	98.4%	0
Speak a language other than English	2.6%	58.0%	42.0% of this LEP*
Spanish or Spanish Creole	4.1%	56.5%	43.5% of this LEP*
Other Indo-European languages	0.0%	70.6%	29.4% of this LEP*
Asian and Pacific Island languages	0.7%	72.0%	28.0% of this LEP*
Other languages	<0.1%	100.0%	0.0% of this LEP*

**Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-year Estimates**

#### 2. LEP Population in the Hammond Urban Area MPO

As referenced above from the U.S. Census Bureau, the LEP population in the entire Tangipahoa Parish is estimated to be 3,137. The Parish is a larger area than the larger MPO designated urbanized area however, with the urbanized area having approximately 65,000 persons over the age of 5. Using the LEP percentage of the population as 1.6%, that would provide an estimate of 1,040 persons in the designated LEP urbanized area population.

## **1. Contacts with Community Organizations that Would Likely Serve LEP Persons**

Steps were taken to identify any concentrations of LEP persons in the Tangipahoa Parish urban metropolitan area through contacts with community organizations that serve LEP persons. TP contacted the communications liaison with the area public school district, the Parish United Way, and the area Human Services Coalition to request information on any specific LEP groups that they are aware of. No known organized diversity groups with LEP are known to exist in Tangipahoa Parish, although there are pockets of LEP speakers in various parts of the Parish. This is primarily Spanish speaking farm and construction workers that live, sometimes seasonally, in the Tickfaw-Independence area of the Parish. In discussions with the Parish's Civil Rights-Communications Liaison, no instances of language barriers have occurred in the past year with any of the Parish departments. When instances do occur, individuals generally speak Spanish and they generally bring an English-speaking adult with them to discuss their issues with Parish staff. However, the Parish does have a Spanish speaking full time worker on staff available to help with translation services if needed. The Parish of Tangipahoa has not to this point tracked LEP instances due to the low number of occurrences.

Local Colleges and School Districts- Contact with the one local University (Southeastern) revealed that while international students attend those institutions, the students speak English well enough to function sufficiently within the community, as they do in the school. Contacts with the public-school district showed that none of the local schools has sufficient LEP students to warrant any programs or to provide LEP assistance in the classroom, although the LEP service is available for public school children through the CM Fagan Migrant Service Center in Natalbany in Tangipahoa Parish (specialty service center for primarily Hispanic children and their parents). (Note: providing translation services)

Tangipahoa United Way and the Human Services Authority- Tangipahoa Parish has contacted these non-profit social service organizations/human service agencies that could work with individuals that may be limited in English proficiency. The two organizations say that in our region, there is very little issue with LEP groups, and no organized effort to provide services since it is not a major service need. However, the Parish will continue to coordinate LEP outreach through the United Way or the Parish School Board staff.

## **2. Assessing the Frequency with which LEP Individuals Come into Contact with Tangipahoa Parish's transit system**

Tangipahoa Parish has held internal discussions with its transit operations personnel to help examine prior experiences with LEP persons. The following conclusions were reached:

- The van drivers have occasional contact with LEP persons, but not to the point where they cannot get passengers to their destinations. The service area for Tangipahoa transit is small and the community is small, so that passengers do not need to communicate very much with the drivers or with transit staff. When a communication barrier arises on the van that cannot be resolved, the driver will contact the transit supervisor for assistance because the supervisors have more time to communicate with the individual and understand their issue. Drivers are instructed to utilize the route maps to communicate where the passenger wants to go. The supervisors estimate that incidents of this nature occur possible once or twice per year.
- No LEP persons have contacted the Administrative transit office personnel.
- No requests have been received at the transit e-mail inbox up to this point.
- No requests have been received by attendees at public meetings held by Tangipahoa Parish.

- Although the contact with LEP persons is infrequent, Spanish is the most common language encountered. With that in mind, the Parish will begin to print more of the bus signage and written route information in both English and Spanish.

A frequent accommodation is for large-text schedules, so those are now printed on an on-going basis and made available upon request.

Based upon the above assessment, Tangipahoa Parish's transit program concludes that it may have occasional contact with LEP persons to the average of one or two encounters per month, which are usually handled easily.

### **3. Assessing the Nature and Importance of the Service to LEP Persons**

Providing updated communication regarding Tangipahoa's fixed-route service is important to LEP persons if the lack of information results in limited access to the bus service. If limited English is a barrier to using the bus system, then the consequences could be serious, including limited access to health care, education, or employment.

The Parish transit program's critical services include route and schedule information, detour information, fare and payment information, passenger information (system rules), information on how to ride, public service announcements, safety and security announcements, passenger comment cards, and transit public notices of various types.

### **4. Assessing the resources available and the cost to provide LEP assistance.**

Based on the low overall LEP population in the Tangipahoa Parish metropolitan area (1,040 est.) and the infrequent contact with LEP persons on the transit system, Tangipahoa Parish has not dedicated specific resources specifically to provide LEP assistance. As a small urban transit system with limited resources, it has not been practical to fund projects that have little demand. However, there are low-cost measures that may be available to provide LEP assistance that could be absorbed in the current operating budget.

The following steps will be considered to translate public information into Spanish and or Braille:

- **Signage-** The Parish will continue to provide appropriate translations on signage inside of transit shelters and vehicles.
- **Website-** The Parish will ensure that information posted on its website will be compatible to allow Google Translate on its pages so that customers can view the information in their language of choice. Not only would customers be allowed to translate their information but they could print a hard copy within their own preferred language. Efforts should be made to provide information in convertible formats such as html, to allow all documents to be accessible to everyone regardless of nationality or disability. Therefore, all written materials on the website (schedules, timetables, detours, alerts, what's new information, ADA applications, Title VI complaint process, etc.) would be available in alternative languages through Google Translate. Route scheduling and fare information will be provided in both English and Spanish.
- **Schedules-** The Parish transit provider provides its printed schedule in English and Spanish format, as well as on the website, and in written forms available to the public.

**Translation Service-** The Parish uses in-house staff for readily available language Spanish translation services at this time. LEP obligations under Title VI: The Louisiana DOT's contact is available to sub-recipients, such as Tangipahoa Parish, to assist in providing meaningful access to LEP persons. This service provides telephone interpreting service for many languages and is available 24/7/365. There are no start-up or maintenance fees and the cost is \$0.85 per minute on a pay as you go basis. This service would provide an immediate benefit for verbal communication with LEP persons if such is needed.

### **Limited English Proficiency (LEP) Plan**

Although the need for LEP assistance is very low in the TPT service area, the following measures can be provided at a relatively low cost to provide better access to an LEP person.

#### **Identifying LEP Persons and Language Assistance Measures**

##### **Free LEP Assistance Notice**

To inform passengers that LEP assistance is available to them free of charge a notice will be placed on TP transit's website, added to the bus schedule, and posted in appropriate locations.

**Survey LEP Persons:** Surveys will be developed for LEP persons to complete through non-profit organizations. The Parish will provide this survey to its human service agencies it works with in order to receive input from those LEP persons needing transit services throughout the Tangipahoa Parish community.

**Survey TPT Staff:** Tangipahoa Parish staff and COA transit staff will be surveyed for any of their alternative language skills to determine language resources available within the transit program.

**Website Translation-** The Parish will access this need with the Parish's Information Technology Consultant, in order to implement Google Translate on the transit website, if feasible. This could be available to anyone to click a drop-down button to change the language on the site to their preferred language.

#### **Staff Training**

The following training will be provided, at least annually, to TPT staff:

1. Tangipahoa Parish's Title VI Program, LEP Plan and discrimination complaint procedures will be discussed with all transit operations employees.
2. LEP awareness training will be included for any new transit or administrative employees on how the Parish hopes to communicate with the LEP population, as well as training procedures if difficulties with LEP communication arises.

#### **Outreach Techniques**

- Documents and Public Meeting Notices - When documents are prepared or public meetings are scheduled for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers will be posted and published on the Parish transit website in Spanish and English. The Parish will add to public meeting announcements that interpretive services are

available upon request if the request is provided at least 3 working days prior to the subject meeting.

- Public Service Announcements on the Local Public Access Television Channel: The Parish will examine the possibility of airing public service announcements on the local public access channel that would inform LEP individuals of how to access the Parish transit services.

### **Monitoring and Updating the LEP Plan**

The LEP Plan will be reviewed and updated each year through the coordinated Parish government and its third-party non-profit provider, in conjunction with input from human service organizations such as United Way. This process will be coordinated by the Parish Personnel department in conjunction with the Council on Aging. Updates will include the following:

- Annual number of documented LEP person contacts encountered.
- Annual use of interpretive language services.
- How the needs of LEP persons have been addressed.
- Determination if the need for services has changed.
- Determination if interpretative services have been effective and sufficient to meet the needs.
- Determine if the Parish is complying with the goals of the LEP Plan, and moving in the proper direction.
- Determine if complaints have been received from the public relating to the Parish's failure to meet the needs of LEP individuals.

### **Sub-Recipient Monitoring**

The sub-recipients operational transit program through contract with the Voluntary Council on Aging, will be monitored for LEP Civil Rights compliance by the Parish program Administrators.

### **Dissemination of the Parish's LEP Plan as part of the Civil Rights Plan**

Tangipahoa Parish's Civil Rights and LEP Plan, Title VI Program, will be available on the Parish and Council on Aging website. A summary of the information will also be made available to the public through postings at public buildings and in newspaper notices. Any person or agency may request a copy of the LEP Plan and Title VI program.

## Tangipahoa Parish Transit Fixed Route Service Standards and Policies

### Service Description

Tangipahoa Public Transportation (through TVCOA) offers fixed route and demand response transit service. Passenger trips are on a call-in, first-come, first-served basis. Subscription services may also be available. TPT will pick up passengers at a specified origination point and transport them to a specified destination point.

### Service Area

Services are provided for any person residing within the geographic area of Tangipahoa Parish. Passengers may be transported to any destination located within Parish boundaries. Specific routes and destinations outside of the Parish may be available upon request.

### Days and Hours of Operation

Office hours are 8:30 a.m. to 4:00 p.m., Monday through Friday. Contact phone number: 985-748-6016.

Vehicle operating hours are Monday through Friday from 7:00 a.m. to 5:00 p.m.

The Holidays observed are as follows: New Year's Day, Martin Luther King Day, Mardi Gras, Good Friday, Memorial Day, Fourth of July, Labor Day, Thanksgiving Day and the Friday after Thanksgiving, Christmas Eve, Christmas Day, New Year's Eve, New Year's Day. Holidays that fall on Saturday or Sunday, the previous or next day will be observed for the official holiday.

### Reservations, Scheduling and Cancellations

All trips are scheduled on a first-come, first-served, call-in basis. Requests for rides must be scheduled during regular office hours and should be scheduled no later than 12:00 noon the day prior to the requested trip.

The Transit System must be informed of each destination when appointment is scheduled. Based upon the availability, time and space of the vehicle, TPT may or may not schedule multiple trips (e.g., more than one trip per day per person). Drivers are not allowed to make any unscheduled trips or make any unscheduled stops.

In order to provide the most cost-effective service, pick-up times for each appointment are determined by the system's needs. When the passenger schedules a trip, he or she will be given an *approximate* pick-up time. (The pick-up time may be as much as 2-hours prior to the scheduled appointment time.) The driver may arrive at a passenger's residence up to 15 minutes before or 15 minutes after the scheduled pick-up time.

The passenger should be prepared to board upon arrival of the vehicle. After arriving at a passenger's pick-up location, the driver will wait no longer than 5 minutes for the passenger to board. (*Assistance will be available, if needed. See "Passenger Assistance" section below.*)

### Fare Policy

Fares are based upon units of one-way trips. A trip is counted each time the passenger boards the vehicle. The cost for a one-way fare must be paid upon boarding the vehicle. The exact amount for the scheduled trip must be paid. The driver cannot make change. The driver will put the amount received for the scheduled trip into a locked cash box. No credit or refund will be given, if amount paid is more than the cost of the trip.

### Passenger Assistance

Passengers are responsible for getting to and from the vehicle. Drivers are required to provide only minimal assistance to passengers boarding a vehicle. Minimal assistance is defined as bracing, holding a passenger's arm, or assisting a wheelchair bound passenger on and off the lift. Drivers will not cross the threshold of any residence. Drivers are responsible for making sure that the wheelchairs/scooters are secured.

Passengers who require additional assistance must have an escort to accompany them on trips. TPT will determine if an escort is necessary. If it is determined that an escort is required due to a passenger's disability, the escort can ride at no charge. All escorts should be capable and must provide appropriate assistance to the passenger. Escorts are not allowed to secure wheelchairs/scooters, etc. Drivers will not wheel in or assist any passenger into any building or medical facility. Children under 17 years of age cannot act as escorts. Passengers requiring escorts are responsible for obtaining their own escorts.

Passengers must provide their own mobility device, etc., walker, cane, wheelchair, etc., and mobility devices(s) should be in safe, good working condition. The driver will make the determination as to whether the mobility equipment is in safe working and/or operating condition. TPT will make every effort to accommodate and secure all mobility devices currently in use. Passengers requiring the use of a wheelchair must have a ramp at their residence. If a ramp is not available, the passenger must provide his/her own assistance in exiting the dwelling. Drivers will not make any on-board transfers (wheelchair to seat) or physically lift any passengers.

Upon request, drivers shall ask, but not require, passengers to yield priority seating at the front of the vehicle to persons with disabilities and seniors.

Mobility device securement areas on vehicles are reserved. Passengers using common mobility devices shall be boarded, if the securement areas are not otherwise occupied by a mobility device, regardless of the number of passengers on the vehicle. Drivers are required to ask passengers sitting in securement areas to move to other available seats.

A "common wheelchair" does not exceed 30 inches in width and 8 inches in length, measured 2 inches above the ground, and does not weigh more than 600 pounds when occupied.

Vehicles may not be able to accommodate mobility device exceeding the above-mentioned standards. Reasonable efforts shall be made to transport persons in oversized mobility device; however, transportation cannot always be guaranteed to a person in an oversized mobility device, and suggestions for alternative transportation shall be provided upon request.

Because some scooters are not designed or cannot safely be secured for transport with a 4-point securement system with a lap & shoulder belt, drivers will use their best efforts to secure this mobility device. In the interest of safety, it may be necessary to request a passenger to transfer to a stationary seat.

As a safety precaution, the driver has the authority to turn off the power switch for any powered mobility device, while loading onto and unloading from the lift platform.

Passengers who are not able to sit upright and stationary in the wheelchair while being transported, must wear an upper posterior belt. Upper posterior belt will not be provided by the transit system.

The maximum load capacity for the lift apparatus is 600 lbs. which includes the weight of the mobility device.

Service animals are allowed to ride the vehicle, in order to provide assistance to visually impaired passengers. All service animals must be leashed and secured with the passenger at all times during transport.

Passengers who require portable oxygen devices are allowed to travel, but the device must be properly secured and not obstruct the aisle. It is recommended that the passenger using oxygen have a spare tank, in the event of unanticipated delays by either the medical facility or transit pick-up.

It is the responsibility of the passengers to make sure all packages, assistive devices, or other items are secure. Drivers will not unload or carry any packages, groceries, commodities, etc. for any passenger into any place of residence or other building.

An adult must accompany all children under the age of 13 years. Children under age 5 are required to use child restraint seats. Child restraint systems are required at all times when transporting children. There are a limited number of restraints on each vehicle.

Drivers will inform passengers of current routes and locations. Each destination will be announced upon arrival at that location.

### Passenger Conduct and Responsibilities

Passengers are expected to behave in a courteous, respectful and polite manner to the driver and other passengers. The driver is responsible for behavior on the vehicle and is authorized to maintain a safe, pleasant atmosphere for all passengers.

1. Passengers must schedule trips in advance, as previously stated in this Policy.
2. Passengers must notify TPT of any cancellations, at least 3 hours prior to the scheduled pick-up time.
3. Passengers are responsible for any items brought or left on a vehicle.
4. Passengers must follow the requirements and guidelines published in this service policy.

The following are inappropriate behaviors and are prohibited:

1. Use of any tobacco products (this includes chewing tobacco)
2. Eating or drinking (except for medical reasons)
3. Foul or offensive language
4. Lack of personal hygiene
5. Bothering other passengers
6. Possessing weapons
7. Fighting
8. Possession of alcohol in an open container
9. Possession of any illegal substance

10. Non-compliance with the transportation policy
11. Refusal to secure carry-on items
12. Inappropriate attire, shoes, shirt, etc.
13. Refusal to use seat belts or securement devices
14. Refusal to follow driver instructions

TPT reserves the right to refuse any passenger services, if the passenger violates any of the above standards.

#### Transit System Responsibilities

TPT is responsible for providing safe, clean, reliable and efficient service. TPT complies with all applicable federal, state and local regulations and laws.

TPT is committed to keeping all vehicles and equipment properly maintained and in safe working order. The system is responsible to provide services as detailed in this policy.

#### Non-Discrimination Service Delivery

TPT will not directly, nor through contractual or other arrangements, discriminate on the basis of race, LEP, color, national origin, gender, or disability, in the provision of services or any other non-merit factor.

#### Contact Information

TPT welcomes any comments or questions concerning the services provided. If you have questions or comments, call 985-748-6016, during system operating hours or write to the following address:

Tangipahoa Public Transit (TVCOA)  
ATTN: Transportation Coordinator  
106 North Bay Street  
Amite, LA 70422

Attachment E

Governing Body Review and Approval Documentation

T.P. Resolution No. R19-01

RESOLUTION OF THE TANGIPAHOA PARISH COUNCIL FOR  
ENDORSEMENT-SUPPORT OF TITLE VI PLAN

WHEREAS, the Parish of Tangipahoa has requested assistance from the Federal Transit Administration (FTA) for programming and funding of the urbanized passenger transit system (south end of the Parish); and

WHEREAS, the Parish is required to maintain and endorse a Civil Rights Plan that can be used for many of its needs, in addition to federal grants programs; and that the Parish already has many existing civil rights and equal opportunity policies; and

WHEREAS, any existing and new policies can be brought together into an overall Civil Rights Plan that provides for complaint procedures, non-exclusive access to facilities and services, etc. and assuring that the Parish is in compliance with Title VI of the Civil Rights Act of 1964 as amended, and that the Parish Government and any of its sub-contractors are committed to providing non-discriminatory programs and services (such as public transit), that are available to the general public;

THEN, THEREFORE BE IT RESOLVED, that the Parish of Tangipahoa Council hereby resolves that the proposed Civil Rights Plan for the Parish is hereby endorsed and adopted, and that the Parish President is given authority to sign the Plan and non-discrimination policy included in the Plan.

On motion by Mr. Wells and seconded by Mr. Vial,  
the foregoing resolution was hereby declared adopted on this the 14<sup>th</sup> Day of January, 2019  
by the following roll-call vote:

YEAS: 10 (Forrest, Bailey, Joseph, Bruno, Ridgel, Mayeaux, Wells,  
Vial, Lavine, Cortez)

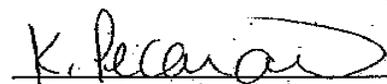
NAYS: 0

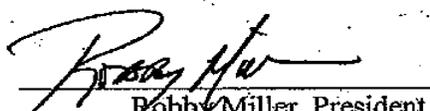
ABSENT: 0

NOT VOTING: 0

ATTEST:

  
Bobby Cortez, Chairman  
Tangipahoa Parish Council

  
Kristen Pecararo, Clerk  
Tangipahoa Parish Council

  
Bobby Miller, President  
Tangipahoa Parish