



LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

**Federal Transit Administration
Title VI Program**

2026

Table of Contents

Chapter	Section	Page Number
Chapter 1:	Non-Discrimination Policy Statement	4
Chapter 2:	Overview of Transit Programs	6
Chapter 3:	Title VI Program Administration	7
Chapter 4:	Requirements to Provide Title VI Assurances	8
Chapter 5:	Title VI Notice to the Public	8
Chapter 6:	Non-Discrimination Complaint Procedures	9
Chapter 7:	Non-Discrimination Complaint Form	11
Chapter 8:	List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	16
Chapter 9:	Public Participation Plan	17
Chapter 10:	Limited English Proficiency Plan	22
Chapter 11:	Transit Planning and Advisory Bodies	28
Chapter 12:	Subrecipient Technical Assistance and Oversight	28
Chapter 13:	Title VI Equity Analysis for Construction	30
Chapter 14:	State Program Requirements	
	Demographic Profile and Analysis	30
	Disparate Impact Analysis	35
	Transportation Planning Process	40
Chapter 15:	Program Administration	
	Procedures to Pass Financial Assistance to Subrecipients	41
	Grant Application Process, Timeline, and Program of Projects Development	41
	Procedures to Provide Technical Assistance to Subrecipients	43
Exhibit 1:	LADOTD Compliance Section Organizational Chart	44



Glenn Ledet, Jr.
Secretary

Office of the Secretary
PO Box 94245 | Baton Rouge, LA 70804-9245
ph: 225-379-1200 | fx: 225-379-1851



Jeff Landry
Governor

January 30, 2026

Ms. Margaret "Peggy" Griffin, Region VI Civil Rights Officer
Federal Transit Administration
Office of Civil Rights
819 Taylor Street, Room 14A02
Fort Worth, TX 76102

Re: Louisiana Department of Transportation and Development (LADOTD) (Recipient ID# 1562)
FTA Title VI Program

Dear Ms. Griffin:

The Louisiana Department of Transportation and Development's Title VI Program is complete and being submitted to FTA as required in the Code of Federal Regulation.

Should you have any questions, please do not hesitate to contact either Paula Roddy at (225) 379-1363 or Michelle Horne at (225) 379-3057.

Sincerely,

Glenn Ledet
Secretary

Attachment (Title VI Program)

Chapter 1: Policy Statement

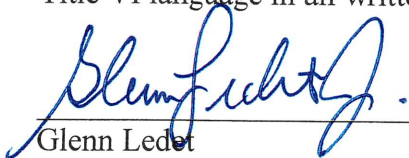
Non-Discrimination Policy Statement (Title VI / ADA / Limited English Proficiency)

The Louisiana Department of Transportation and Development (LADOTD) 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. LADOTD 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.) In addition, the LADOTD also assures efforts will be made to provide meaningful access to persons that have limited English proficiency.

LADOTD will be responsible for initiating and monitoring Title VI activities, preparing required reports and other LADOTD responsibilities as required by 23 Code of Federal Regulation, (CFR) 200 and 49 Code of Federal Regulation 21.

In the event the LADOTD distributes federal aid funds to subrecipients, the recipients will include Title VI language in all written agreements/contracts and will monitor for compliance.



Glenn Ledet
Secretary, Louisiana Department of
Transportation and Development

2/6/2024
Date

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 **Louisiana Department of Transportation and Development** may file a Title VI complaint by submitting the agency’s Title VI Complaint Form to:

Cynthia H. Douglas, Title VI/ADA Program Manager
P.O. Box 94245
Baton Rouge, LA 70804-9245

Telephone Number: (225)379-1923
Fax Number: (225)379-1865

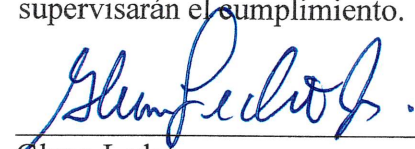
Declaración de política de no discriminación (Título VI/ADA /Dominio limitado del inglés)

El Departamento de Transporte y Desarrollo de Luisiana (LADOTD) asegura que ninguna persona por motivos de raza, color u origen nacional según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y la Ley de Restauración de Derechos Civiles de 1987 (P.L. 100.259) ser excluido de la participación en, ser negado los beneficios de, o ser sujeto de otra manera a discriminación bajo cualquier programa o actividad. LADOTD asegura que se hará todo lo posible para garantizar la no discriminación en todos sus programas y actividades, ya sea que esos programas y actividades estén financiados por el gobierno federal o no (incluidas las autoridades y citas adicionales del Título VI).

La Ley de Restauración de los Derechos Civiles de 1987 amplió el alcance de la cobertura del Título VI al expandir la definición de los términos "programas o actividades" para incluir todos los programas o actividades de los beneficiarios de ayuda federal, sub-beneficiarios y contratistas/consultores, ya sean dichos programas y las actividades cuentan con asistencia federal o no (Ley Pública 100259 [S.557] del 22 de marzo de 1988). Además, LADOTD también asegura que se hará todo lo posible para brindar un acceso significativo a las personas que tienen un dominio limitado del inglés.

LADOTD será responsable de iniciar y monitorear las actividades del Título VI, preparar los informes requeridos y otras responsabilidades de LADOTD según lo exige el Código de Regulaciones Federales 23, (CFR) 200 y 49 Código de Regulaciones Federales 21

En caso de que LADOTD distribuya fondos de ayuda federal a subbeneficiarios, los beneficiarios incluirán el lenguaje del Título VI en todos los acuerdos/contratos escritos y supervisarán el cumplimiento.



Glenn Ledet
Secretary, Louisiana Department of
Transportation and Development



Date

Cualquier individuo, grupo de individuos o entidad que crea que ha sido discriminado por motivos de raza, color u origen nacional por parte del Departamento de Transporte y Desarrollo de Louisiana puede presentar una queja del Título VI enviando el Formulario de queja del Título VI de la agencia a:

Cynthia H. Douglas, Gerente del Programa Título VI/ADA
CORREOS. Caja 94245
Baton Rouge, LA 70804-9245

Teléfono: (225)379-1923

Número de fax: (225)379-1865

Chapter 2: Overview of Transit Programs

The Governor designated LADOTD as the agency responsible for administering Federal Transit Administration (FTA) programs. The Public Transportation Section is located in the Office of Planning of the LADOTD. The mission of the Public Transportation Section is to improve public transit in all areas of the State so that Louisiana's citizens may enjoy an adequate level of personal mobility regardless of geographical location, physical limitation or economic status.

The Public Transportation Section is responsible for the overall administration of federal and state public transportation financial assistance through several grant programs:

- Metropolitan Planning Program (Section 5303)
- Statewide Planning and Research Program (Section 5304)
- Enhanced Mobility of Seniors and Persons with Disabilities Program (Section 5310)
- Formula Grants for Rural Areas Program (Section 5311)
- Bus and Bus Facilities Formula Grants (Section 5339)
- Parish Transportation Fund Program

The LADOTD Public Transportation Section does not operate any transit services. The Public Transportation Section coordinates with the LADOTD Compliance Section to ensure consistency with the LADOTD Title VI/Nondiscrimination Plan and inclusion of FTA requirements related to Title VI in the LADOTD's overall Civil Rights Programs.

The Public Transportation Regional Program Managers (RPMs) are the first point of contact for agencies to request guidance and technical assistance for Title VI Programs. The RPMs may request technical assistance from the Compliance Section contact for Title VI.

The previously updated LADOTD FTA Title VI Program was submitted to FTA Region VI, via the TrAMS system on January 31, 2023. The current LADOTD FTA Title VI Program is compliant with FTA Circular 4702.1B and will be submitted in FTA's TrAMS system on or before February 1, 2026. The updated document will be in effect for three years and will expire on March 31, 2029.

This Title VI Program update incorporates changes in policies and procedures based on the most current FTA Circular for Title VI (4702.1B), and the Public Transportation Section State Management Plan (SMP) for Sections 5310, 5311, and 5339 Grant Programs.

Chapter 3: Title VI Program Administration

The LADOTD Compliance Section oversees the development and implementation of civil rights programs for LADOTD. The Compliance Section administers the Title VI, Environmental Justice, Limited English Proficiency (LEP), Disadvantage Businesses Enterprise (DBE), Americans with Disabilities Act (ADA), Supportive Services, Contract and Labor Compliance, and On-the-Job Training compliance programs. The Compliance Section works with the other entities within the LADOTD, including the Public Transportation Section, to ensure compliance with civil rights requirements. As shown in the organization chart in Exhibit 1, the Compliance Section has the following key staff:

- The **LADOTD Compliance Program Statewide Program Manager** is responsible for supervising, monitoring and evaluating the performance and effectiveness of the various programs as well as federal compliance oversight on Federal Highway Administration (FHWA) funded construction projects and Federal Transit Administration (FTA) funded projects.
- The **Title VI / ADA Program Manager** is responsible for the development and implementation of the Title VI program. The Program Manger ensures that all entities within LADOTD are compliant with Title VI. Title VI responsibilities are as follows:
 - Process the disposition of Title VI complaints received by LADOTD.
 - Review statistical data collected (race, color, national origin, age, gender, LEP, disabilities, and income levels) of participant in, and beneficiaries of state highway programs, i.e. relocates, impacted citizens, and affected communities. Review Environmental Impact Statements for Title VI and Environmental Justice compliance.
 - Conduct and/or assist in annual Title VI process reviews of program areas, cities, parishes, consultants, contractors, suppliers, universities, planning agencies, and other sub recipients of USDOT federal funds.
 - Review state programs directives in coordination with Title VI Liaisons for program areas and include Title VI language and related requirements.
 - Conduct training programs on Title VI and related statutes for state program officers, civil rights officials, and LADOTD subrecipients of federal funds.
 - Prepare the Title VI Annual Summation Report presenting the accomplishments for the past year and goals for the next year.
 - Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
 - Conduct post-grant approval reviews of state programs and applicants for compliance with Title VI requirements; i.e. highway location, design and relocation, and persons seeking contracts with the state.
 - Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.
 - Provide technical assistance to subrecipients in the development of their Title VI Plan and assurances.

Chapter 4: Requirement to Provide Title VI Assurances

The Public Transportation Section submitted the FTA Certifications and Assurances in TrAMS on the following dates:

- FY 2023 submitted February 20, 2023
- FY 2024 submitted May 14, 2024
- FY 2025 submitted July 1, 2025

The Public Transportation Section collects Certifications and Assurances (C&A) from sub recipients on an annual basis and are kept in the application file within the Public Transportation Section.

Fiscal Year 2026 C&A have not been released by FTA. Once released, the Public Transportation Section will submit the C&A via TrAMS, FTA's web portal and sub recipient C&As will be collected and filed with the application.

Chapter 5: Title VI Notice to the Public

For its transit-related programs, LADOTD notifies the public of its rights under Title VI by positing the **Notifying the Public of Rights under Title VI** in English and Spanish. The Title VI Notice to the Public is posted on LADOTD's website, at LADOTD Headquarters, and in subrecipient transit vehicles.

Notifying the Public of Rights under Title VI

- The Louisiana Department of Transportation and Development (LADOTD) 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LADOTD.
- For more information on LADOTD's Civil Rights Program and the procedures to file a complaint, please call (225)379-1923; email:Cynthia.douglas@la.gov visit our administrative office at 1201 Capitol Access Road, Baton Rouge, LA 70804. For more information, visit www.LADOTD.la.gov.
- A complainant may file a complaint directly with the Federal Transit Administration (FTA), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TRC, 1200 New Jersey Ave., SE, Washington, DC 20590. Phone: (225)366-4018.
- If information is needed in another language, please contact the Louisiana Department of Transportation and Development, Public Transportation Section at (225)379-3055.

Notificación al Público de los Derechos Garantizados por Título VI

- El Departamento de Transporte del estado de Louisiana 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 Departamento de Transporte de Louisiana.
- Para obtener más información sobre el programa de derechos civiles del Departamento de Transporte de Louisiana o para obtener más información sobre los procedimientos para presentar una queja, llame al (225)379-1923; email: Cynthia.douglas@la.gov, o visite nuestras oficinas administrativas en 1201 Capitol Access Road, Baton Rouge, LA 70804. Para obtener más información, visite www.LADOTD.la.gov.
- Un demandante puede presentar una queja directamente a la Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Atención: Coordinador del Programa de Título VI, East Building, 5th Floor TCR, 1200 New Jersey Ave, SE, Washington, DC 20590. Teléfono: (202)366-4018.
- Si se necesita información en otro idioma, por favor póngase en contacto con El Departamento de Transporte del estado de Louisiana (225)379-3055.

Chapter 6: Non Discrimination Complaint Procedures

The **Louisiana Department of Transportation and Development's** Non Discrimination Complaint Procedure (Title VI / ADA) is made available in the following locations:

- Agency website, if available:**
- Hard copy in the central office**
- Upon request to LADOTD Title VI Coordinator in the LADOTD Compliance Section.**

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin, disability, sex, age low-income or LEP (Limited English Proficiency) by the **Louisiana Department of Transportation and Development** 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 **Louisiana Department of Transportation and Development's** Compliance Programs Office no later than 180 days after the following:

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

Once the complaint is received, the **Louisiana Department of Transportation and Development's** Title VI/ADA Coordinator will review it to determine if our office has jurisdiction. In cases where the complaint is against one of LADOTD's subrecipients of federal highway funds or federal transit funds, the Department will assume the jurisdiction and will investigate and adjudicate the case. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Louisiana Department of Transportation and Development's** Title VI/ADA Coordinator has 45 days to investigate the complaint. If more information is needed to resolve the case, the Title VI/ADA Coordinator 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 LOF to do so. The Title VI/ADA Coordinator will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

Procedimiento de Queja Titulo VI/ADA

El formulario de queja del Titulo VI/ADA del **Departamento de Transporte y Desarrollo de Louisiana** esta disponible en las siguientes ubicaciones:

- Pagina web de la agencia
- Copia impresa localizada en la oficina central
- Titulo IV corresponde a la agencia

Cualquier individuo, grupo de individuos o entidad que crea que ha sido objeto de discriminacion por motivos de raza, color, origen nacional, discapacidad, sexo, edad de bajos ingresos o LEP (dominio limitado del inglés) por el del **Departamento de Transporte y Desarrollo de Louisiana** 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.

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 del **Departamento de Transporte y Desarrollo de Louisiana** 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 incluira la fecha del ultimo acontecimiento.

Una vez que se reciba la queja, el / la Coordinador del Titulo VI / ADA del del **Departamento de Transporte y Desarrollo de Louisiana** 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 del **Departamento de Transporte y Desarrollo de Louisiana** 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 la carta de hallazgo para hacerlo. El / La Coordinador (a) 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.

Chapter 7: Non-Discrimination Title VI / ADA Complaint Form

The Louisiana Department of Transportation and Development's Non Discrimination (Title VI / ADA) Complaint Form is made available in the following locations:

- Agency website, if available: www.LADOTD.gov
- Hard copy in the central office
- Upon request to LADOTD Title VI Coordinator in the LADOTD Compliance Section.

Non-Discrimination Title VI / ADA Complaint Form

Section I:

Name:

Address:

Telephone (Home):

Telephone (Work):

Email Address:

Accessible

Format

Large Print

Audio Tape

Requirements?

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 Sex Age Income Status LEP

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 225-379-1923.

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

Cynthia H. Douglas, Title VI/ADA Program Manager

P.O. Box 94245

Baton Rouge, LA 70804-9245

Telephone Number: (225)379-1923

Fax Number: (225)379-1865

**Procedimiento de Queja Titulo No Discriminacion for
Department of Transportation and Development**

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 [] Discapacidad [] Sexo [] Edad [] Estado de ingresos [] LEP

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 Department of Transportation and Development?
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:

Cynthia H. Douglas, Gerente del Programa Título VI/ADA
CORREOS. Caja 94245
Baton Rouge, LA 70804-9245
Teléfono: (225)379-1923
Número de fax: (225)379-1865

Chapter 8: List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Subrecipient:
Louisiana Department of Transportation and Development (LADOTD)

Contact Person:

Paula Roddy
Compliance Programs
Statewide Program Manager

Contact Person:

Michelle Horne
Public Transit Director

Check one:

There have been no investigations, complaints and/or lawsuits filed against LADOTD during the reporting period.

There have been investigations, complaints and/or lawsuits filed against LADOTD during the reporting period. See attached list. Include additional information and documentation as needed.

Chapter 9: Public Participation Plan

The Louisiana Department of Transportation and Development is responsible for maximizing the limited transportation funding by coordinating with government agencies, public bodies, transit operators, human service agencies, and the general public.

To be successful, LADOTD must promote itself to all segments of Louisiana society- every race, every ethnicity, every cultural background, male and female, young and old. We must represent Louisiana's communities to ensure comfort and confidence in customer relations and service. Therefore, it is essential that LADOTD provide employee representation at public meetings that is responsive to the public served, to the extent practicable.

This guidance is intended to aid those LADOTD sections and individuals who plan, organize, and conduct public meetings in considering the composition of the team, including consultants, that will represent LADOTD with respect to the anticipated composition of the public that will attend the meeting

Public Meeting Planning Considerations:

- Type of Meeting
- Format of Meeting
- Subject of Meeting
- Who should attend – with specific attention to ensuring the participants are representative of the demographics on both presenters and public participants
- Audience demographics – to include census driven attention to race, ethnicity, age, language proficiency, income, education, and gender
- Meeting venue – with attention to accessibility and proximity to project area
- Date/Time of meeting to consider public availability

Guidance for Assembling an LADOTD Team for Public Engagement:

The task of the meeting organizer is to assemble a team to represent LADOTD that is reflective of the demographics of the area such that members of the audience can identify with at least one member of the team. In doing so, the following should be considered:

- Make sure the presentation format, style, and graphics are reflective of the area, or at least are neutral, such as in pictures or artist renderings of people, buildings, or

streetscapes, etc. District staff and local officials may be able to provide insight into any locally sensitive issues.

- Presenters should be well-informed employees who match the demographics of the area to the extent practicable.
- While each member of the LADOTD team does not need to be well versed in every aspect of the project, each member must be able to meaningfully participate in the public meeting. If they cannot, the public may come to the conclusion that the LADOTD staff is inexperienced or incompetent, and that would cause more harm than benefit.
- The team should include an employee from the LADOTD District Office in which the meeting is held. Headquarters staff are often not known and are considered outsiders. District staff are more likely to be considered insiders and more trustworthy.
- Presentations should be accessible and understandable to citizens of all education levels. Simplify your message.
- Arrange for an interpreter(s) if the demographics of the area indicate such services are needed. The Compliance Programs Section can assist with securing such services.

Meeting Notifications:

- Notification and/or approval to hold a public meeting should be obtained from the Section Administrator.
- Notification of meetings should be forwarded to the Public Information/Customer Service Section for placement in a central location on the LADOTD intranet that is accessible to all employees.
- Employees and consultants that will represent LADOTD should be notified in advance of the expected audience demographics and any known locally sensitive issues or concerns.

Participation in Non-LADOTD Events:

LADOTD is often requested to participate in public meetings conducted by external parties (other state agencies, local governments, business or community organizations, etc.). When multiple LADOTD employees or consultants participate in public meetings with external partners, the team leader should consider the composition of the group to ensure Louisiana's communities are represented and to foster comfort and confidence in customer relations and service.

In addition to the LADOTD efforts, the Public Transportation Section actively participates in the development of the Human Services Transportation Coordination Plan for the state and the Statewide Transportation Plan. The development of these plans also include public participation through the development and implementation of activities.

Projects funded through FTA funds must be a product of the statewide and nonmetropolitan transportation planning process and/or the metropolitan planning process specified in the joint

Federal Highway Administration (FHWA)/FTA planning regulations at 23 CFR part 450 and 49 CFR part 613. Long range planning and goal-setting activities for the individual programs covered are carried out within these statewide, nonmetropolitan, and metropolitan planning processes, discussed further below.

Transportation Plan Concurrency

Projects awarded assistance grants must be a product of the metropolitan planning process or the statewide planning process specified in Section 5303 and Section 5304. All transit projects anticipating using Federal funding within metropolitan planning boundaries must be included in a metropolitan TIP approved by the MPO and the Governor, and in a Statewide Transportation Improvement Program (STIP) that has been approved by FTA and the Federal Highway Administration (FHWA).

Transportation Improvement Plan

The TIP is a federally-required program document, which lists all the transportation projects to be built or implemented in a metropolitan area that have secured and committed funding. The document is a short term planning guide that generally covers four years. All FTA-funded public transportation projects must be included in the appropriate TIP.

Statewide Transportation Improvement Program

The STIP is a planning document, which lists all the transportation projects to be built or implemented in the state that will utilize federal and local funding. The document must be submitted to both the FHWA and FTA at least every four years. All FTA-funded public transportation projects must be included in the appropriate STIP.

Louisiana Statewide Transportation Plan

The long-range planning goals for the state of Louisiana were outlined in the most recent update to the Statewide Transportation Plan. The goals for Louisiana's transportation system are as follows:

- ▶ To develop and maintain an innovative, balanced, safe, equitable, integrated system of transportation facilities and services.
- ▶ To provide essential passenger-transportation services at reasonable public expenses, meeting the community-based needs of the people of Louisiana regardless of their geographic location, physical condition, economic status, or service requirements.
- ▶ To provide a transportation system that fosters varied economic and job growth, international and domestic commerce, and tourism through prudent investment in facilities and services that improve mobility and access. The system should be responsive to free markets and to user needs and expectations, through flexibility and choice, in a competitive, multimodal environment.

- ▶ To provide a regulatory and comprehensive policy framework that promotes partnerships, coordination, and cooperation among transportation users and providers in a competitive multimodal environment.
- ▶ To improve safety in all transportation modes through timely maintenance of existing infrastructure, development of new infrastructure, enhancement of operational controls of both passenger and freight movements, and through expanded public education and awareness.
- ▶ To develop an efficient transportation system that improves air, water, and noise indices to acceptable levels as defined by regulatory standards; reduces dependency on foreign energy sources; preserves historic, cultural, and environmentally sensitive sites; promotes the natural beauty of the State; raises the quality of life for Louisiana's citizens; uses land resources efficiently by incorporating smart growth development principles; and promotes and implements the context sensitive design of transportation infrastructure.

The Louisiana Statewide Transportation Plan is updated periodically. Transportation system goals and focus areas may change over time, however, the overall aim is to provide a safe, efficient, and well-maintained transportation system and is anticipated to remain constant.

State Agency Coordination

The Louisiana Department of Transportation and Development actively fosters state level coordination initiatives. These initiatives are executed in the Review Committee and other inter-agency committees. LADOTD coordinates FTA funding for programmatic or public transportation operations, has developed a Statewide Human Services Transportation Plan, and is involved in regional coordination plans. LADOTD also provides coordination workshops charged with the responsibility to enhance coordination of transportation services at the regional level. Specific efforts to coordination have been undertaken through LADOTD, the MPOs and local public and private transportation providers by having quarterly regional human services transportation plan meetings. Included in these meetings are all the State Human Services Agencies that administer or fund public transportation in Louisiana. These include the following state agencies:

- ▶ Governor's Office of Elderly Affairs (GOEA);
- ▶ Department of Children and Family Services (DCFS);
- ▶ Louisiana Department of Health (LDH);
- ▶ Louisiana Workforce Commission (LWC);
- ▶ Governor's Office of Disability Affairs (GODA); and,
- ▶ Louisiana Department of Transportation and Development (LADOTD).

These state agencies are responsible for the management and administration of programs whose clients are likely to include the elderly and individuals with disabilities. Each of these agencies are represented on the Review Committee where each agency delegate has an opportunity to identify coordination issues and opportunities. LADOTD relies on the diversity of programs and groups

represented on the Review Committee to assist in coordinating the available resources and services and to ensure the maximum coordination of transportation services.

The purpose of coordination is to obtain the maximum use of transportation resources and increase the cost efficiency of providing transportation services by coordinating and consolidating administration, planning and funding of providing public and specialized transportation services.

LADOTD is responsible for providing and/or administering transportation services and resources and share a common goal of managing available transportation service funding in an accountable and cost-effective manner. The degree of success achieved by each plan however, is predicated on continuous open communication, and cooperation and coordination of resources between the respective agencies, providers and individuals.

The development of a truly coordinated human service transportation plan in Louisiana is dependent on state administered funds being coordinated to both build and maintain the system. Although federal funds administered by LADOTD are allocated by program, the state can coordinate the expenditure in such a way as to obtain optimal benefit. LADOTD intends to continue its efforts to coordinate Louisiana's publicly funded transportation systems.

State Efforts to Encourage and Enhance Project Level Coordination

The potential for coordination is enhanced through the LADOTD application process which requires applicants to notify other transportation service providers and to publish public notices about the intent and description of the proposed project. Such contacts with all parties interested in or involved with providing transportation services foster opportunities to coordinate resources and services. LADOTD's application procedures require applicants in urbanized areas to contact and coordinate efforts through metropolitan planning organizations.

LADOTD's application procedures also require applicants in rural areas to contact and coordinate efforts through the Rural Public Transit Systems.

Local Plan Coordination

The *Louisiana Administrative Handbook for Public Transportation Programs* contains a description of coordination procedures to be followed by local applicants. Applicants are responsible for coordinating with all local governing bodies, public and private transit and paratransit operators which provide service within the project area, and any other interested group or organization. The applicant is required to obtain and provide a description of all transportation services presently operating in the service area.

All FTA-funded public transportation programs must participate in the local planning process for the coordinated human service transportation plan. LADOTD has developed a *Statewide Coordinated Human Services Transportation Plan* that works to include transit providers, human services organizations, not-for-profit organizations, and other state agencies with transit needs.

All FTA public transportation program applicants are required to notify the appropriate Metropolitan Planning Organization (MPO) or Regional Planning Commission (RPC) by letter to ensure the proposed project is included in the local transportation improvement plan. The MPO or RPC

must certify to LADOTD that the proposed project is included in the local transportation improvement plan.

Public Outreach Activities previous years:

Date	Lead	Public Outreach and Involvement Activity
5/16/2023	Public Transit	2023 Director’s Meetings for all FTA Transit sub-recipients
6/1/2023	Public Transit	Public Notice open call for applications issued through newspapers throughout Louisiana
10/30/2023	Compliance Section	DBE Presentation at the 2023 Louisiana Public Transit Association Conference
4/24/2024	Public Transit	2024 Director’s Meetings for all FTA Transit sub-recipients
6/1/2024	Public Transit	Public Notice open call for applications issued through newspapers throughout Louisiana
4/29/2025	Public Transit	2025 Director’s Meetings for all FTA Transit sub-recipients
05/08/2025	Public Transit	Issued public notice to notify transit partners of LADOTD hosted DBE meetings
5/20/2025	Compliance Section & Public Transit	DBE meetings in Baton Rouge
5/22/2025	Compliance Section & Public Transit	DBE meetings in Shreveport
6/1/2025	Public Transit	Public Notice open call for applications issued through newspapers throughout Louisiana
7/28/2025	Public Transit	Application assistances at the 2025 Louisiana Public Transit Association Conference
08/07/2025	Public Transit	Application assistances at LADOTD

Chapter 10: Limited English Proficiency Plan (LEP)

FOUR FACTOR ANALYSIS

In adherence with Federal regulations, the LADOTD will make reasonable efforts to ensure its programs, services, and activities are meaningfully accessible to those who do not speak English proficiently. The Department will utilize its bilingual employees, State and Local partners, organizations, community groups, and other language services to provide oral interpretation and translation of program documents, as required. To determine if or when alternate language usage is required for meaningful access, the Department will assess the program, services, or activity using the following four factor analysis:

Factor 1 – The number or proportion of LEP persons eligible to be served or likely to be encountered by the Department’s programs, services or activities.

- The Census 2024 reports a population of 4,597,740 for Louisiana. The 2024 American Community Survey (ACS) shows that the 3 most prevalent languages spoken by individuals who are LEP in Louisiana (among the population 5 years and over who speak a language other than English) are: Spanish or Spanish Creole (5.1%); Other Indo-European (2.1%); Asian and Pacific Islander (1.3%).

Factor 2 – The frequency with which LEP individuals come in contact with these programs, services or activities.

- Currently, Louisiana transit agencies are providing over 1 million rides annually and the monthly service data continues to improve. Our transit agencies have an open door policy and will provide rides to any person who requests a ride. 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 programs, services, or activities to people’s lives.

- All of LADOTD’s programs are important; however, those related to safety, public transit, ROW, environment, nondiscrimination and public involvement are among the most important. As such, publications and other material disseminated regarding these programs are routinely available in Spanish. Nevertheless, the LADOTD 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 LADOTD continually evaluates its programs services and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI brochure and LEP brochure are available in Spanish on the LADOTD website.

Factor 4 – The resources available to the Department and costs.

- The LADOTD makes every effort to make its programs, services and activities accessible to LEP individuals. In addition to documents that are routinely published in the most frequently encountered languages, the LADOTD will use available resources, both internal and external to accommodate reasonable requests for translation.

The LADOTD had 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 are verified and distributed by the Title VI Coordinator as needed.
- b) Transit agencies providing service have been provided printable “I Speak” language cards.
- c) The LADOTD and transit agencies have developed partnerships with local agencies, organizations, law enforcement, college/universities, local school districts and social service agencies that are available to assist with its LEP responsibilities.

- d) A list of web based translation services can be provided by contacting the LADOTD Human Resources Section.

Persons requiring special language services should contact LADOTD's Compliance Programs Office at (225) 379-1382.

IMPLEMENTATION

The LADOTD Title VI Program Manager is responsible for monitoring agency programs and activities to ensure meaningful access for LEP persons. The LADOTD Compliance Programs Statewide Program Manager and LADOTD Title VI Program Manager will identify language service needs and strategies for responding to those needs. The Title VI Program Manager, Cynthia H. Douglas, can be reached at 225-379-1923 or by email at cynthia.douglas@la.gov is responsible for monitoring agency programs and activities to ensure meaningful access for LEP persons. The Compliance Programs Statewide Program Manager has designated the Title VI Program Manager as the agency's Language Access Coordinator (LAC). The Coordinator's duties include:

- Ensure identification and securing of existing and needed resources (in-house, new hires contract, resource sharing with other agencies, volunteers, or other) to provide oral and written language services.
- Identify and develop or recommend guidelines to implement the Plan.
- Identify criteria for designation of languages for initial round of translation, based on demographic data;
- Create systems to distribute translated documents, post electronically, and main supply;
- Identify training needs and provide for training to LEP Monitors, staff and managers needing to use language services, as well as language service providers on staff.
- Establish protocols for ensuring quality, timeliness, cost-effectiveness, and appropriate levels of confidentiality in translations, interpretation, and bilingual staff communications.
- Identify and implement a system for receiving and responding to complaints.
- Exchange promising practices information with divisions, districts, and residencies.
- Review the progress of LADOTD on an annual basis in providing meaningful access to LEP persons, develop reports, and modify LEP Guidelines as appropriate.

LEP Monitors – in addition, the Compliance Programs Statewide Program Manager, the Title VI Program Manager and Title VI interdisciplinary Designees will serve as LEP Monitors for sections and districts. LEP Monitor duties include:

- Work with the LEP Coordinator to identify needs and strategies for meeting those needs so that staff will have access to appropriate language services.
- Ensure the facility's compliance with the LEP Guidelines, including any implementation.
- Provide training to facility staff on implementation of LEP Guidelines.
- Establish and maintain the facility's language assistance resources list, ensuring competency; revise the list as needed.
- Maintain data on requests from LEP persons and provide reports to management and the LEP Coordinator on an annual basis.

Training

LADOTD subrecipients should know their obligations to provide meaningful access to information and services for LEP persons, and all persons in public contact positions should be properly trained. An effective training objective will include training to ensure that:

- LADOTD subrecipients know about LEP policies and procedures
- LADOTD subrecipients will include this training as part of the orientation provided for new employees.

Management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff. As mentioned above, training will be provided by the Title VI Program Manager and Compliance Programs Statewide Program Manager.

SITUATIONAL NEEDS ASSESSMENT

The agency will be responsive to all customer relations related to assess the need for language services on a district and/or statewide basis and make language assistance services available as deemed appropriate. In making this assessment, the agency will examine the prevalence of LEP stakeholders statewide, by district and/or by service area of program:

- The number of proportion of LEP persons served or encountered in the eligible service population
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program, activity, or service to people's lives
- The resources available to LADOTD and costs to provide LEP services

In making this assessment, the agency will consider the following among other data sources:

- United States census results
- Data maintained by the agency
- The agency's past experience in providing services to LEP stakeholders
- Data maintained by other agencies including the Louisiana Department of Education and the Louisiana Department of Health
- Information sources maintained by private and public local entities, including community-based organizations and local social services departments need will be identified based upon the type of contract.

Contact the LADOTD Compliance Programs Statewide Program Manager or the LADOTD Title VI Program Manager. They will assist in identifying the language need of the LEP person and provide them with assistance.

Written documents

Contact the Compliance Programs Statewide Program Manager or the Title VI Program Manager. Electronic capability will result in the efficient return of written translated documents. The district can

scan the document and email it to the Compliance Program Office, their Title VI Designee or the Title VI Program Manager. If they do not have scanning capability and the document was not received by them electronically, then they can use inter-office mail to send the document.

- a) The Title VI Program Manager will create a mix of language assistance resources appropriate to the demographics of each district.
- b) The Title VI Program Manager will evaluate language resources available in their service area including community colleges, state and private universities, and community-based organizations. (Civil Rights Managers may, with the approval of the Civil Rights Division Administrator, enter into agreements for the provision of such services with community resources.)
- c) Districts with a lower need for language services may coordinate with other districts that maintain a larger resource pool to utilize their language resource services to any extent practicable.
- d) The Title VI Program Manager will maintain a database tracking LEP contacts. District offices shall make the data available to the Title VI Program Manager as requested.
- e) The Title VI Program Manager will communicate to staff that the use of a family member or friend may only take place after informing an LEP person of his/her right to free interpreter services and will only be used as a last result because family members may not have the subject knowledge necessary to communicate the information accurately and in the best manner possible.

Headquarters

- a) The LADOTD Title VI Program Manager will institute an LEP protocol appropriate to Headquarters.
- b) Headquarters protocol will be designed using the agency resources described in section 2 of these guidelines.

Other Covered Entities:

Contractors, sub-contractors, MPOs, PDCs, and other entities that receive funds from LADOTD for federal projects are covered under Title VI. LADOTD will include language in any contract or Memorandum of Understanding stating that the recipient or subrecipient is responsible for monitoring access for limited English proficiency.

AGENCY DOCUMENTS

The LADOTD Title VI Program Manager, Compliance Programs Statewide Program Manager and management will, on a continuing basis, identify vital documents that are routinely provided to stakeholders that will be translated into languages other than English. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Whether or not a document is vital depends on how significant the impact on the health, safety, legal rights, or livelihood of an LEP person may be. Written documents included electronic documents and websites. Vital documents may include materials such as:

- Emergency transportation information;
- Notices of public hearings and proposed transportation plans;
- Community educational materials;
- Notices notifying LEP persons of language assistance at no cost to the LEP person;
- Written tests in a classroom;
- Markings, signs, and packaging for hazardous materials and substances;
- Signs in bus and train stations, and in airports;
- Signs in waiting rooms, reception areas, and other initial points of entry; and
- Instructions on how to participate in recipient's program.

The LADOTD Title VI Program Manager will coordinate with a Language service provider to have identified documents translated accordingly.

Translated documents will be made available on the LADOTD portal for sections' and districts' access.

ADJUDICATION OF COMPLAINTS

Any LEP individual has a right to file a complaint against the agency where he or she believes that the agency did not provide necessary LEP services as appropriate. These complaints include those available under Title VI of the Civil Rights Act of 1964.

All complaints, alleging a violation under Title VI will be referred to the LADOTD Title VI Program Manager or Compliance Programs Statewide Program Manager.

The LADOTD Title VI Program Manager and Compliance Programs Statewide Program Manager will take appropriate steps to resolve all complaints in accordance with the agency's discrimination complaint procedures.

The LADOTD Title VI Program Manager will maintain a database tracking requests for language services. The database will include the following items:

1. Source of complaint
2. LEP request including relevant contact information
3. Nature of complaint request
4. Date complaint / request received
5. Date complaint / request resolved
6. Finding
7. Manner of resolution
8. Comments

Fact-finding procedures by the Title VI Program Manager and Compliance Programs Office will follow the investigation protocol in the Title VI Manual.

Additional resources to support language translation would be sought through universities, community colleges, catholic charities, and other interpreter services in local areas of need.

Chapter 11: Transit Planning and Advisory Bodies

Below is a table depicting the membership of appointed committees and councils broken down by race. LADOTD will make efforts to encourage minority participation on all advisory groups and committees. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit community. LADOTD will utilize the minority population demographic maps in order to focus on the areas in which the committee/advisory group participation information is distributed.

Body	White alone	Black or African-American alone	Asian alone	American Indian and Alaska Native alone	Two or more Races	Latino
Service Area Population	56.4%	30.4%	1.8%	0.7%	8.1%	7.8%
House Transportation Committee Members	57%	31%				
Senate Transportation Committee Members	74.3%	23%				

Chapter 12: Subrecipient Technical Assistance and Oversight

It is the responsibility of the LADOTD Compliance Program Statewide Program Manager to develop and implement a Non-Discrimination template for FTA subrecipients to utilize in developing their own agency plan. LADOTD Public Transit will monitor their subrecipients and solicit guidance from LADOTD Compliance if discrimination practices are found to exist.

Procedures will be implemented by LADOTD Compliance Section to identify and eliminate discrimination when found to exist, including, but not limited to issues of accessibility of National Highway Institute (NHI) training to all qualified LADOTD employees, utilization of Disadvantaged Business Enterprises (DBE) contractors, public involvement, and property acquisition.

LADOTD transit subrecipients will submit a triennial Title VI program to the LADOTD Public Transit staff to assure effectiveness in their compliance of Title VI provisions. The Appointing Authority of the program area or agency will coordinate efforts to ensure the equal participation in all their programs and activities at all levels. The reviews will entail examination of the recipients' adherence to all program requirements, including DBE responsibilities.

The Title VI Unit will conduct an on-site review on the Department's program areas and subrecipients on a three-year rotational basis.

Remedial Action

LADOTD will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements, both within LADOTD and its subrecipients of federal highway funds and federal transit funds. When irregularities occur in the administration of the federal-aid highway program's operation, corrective action will be taken to resolve Title VI issues. When conducting Title VI compliance reviews on its subrecipients, LADOTD will provide in writing a remedial action agreed upon by LADOTD and FTA to be necessary all within a period not to exceed 90 days.

LADOTD will seek the cooperation of the subrecipient in correcting deficiencies found during the review. LADOTD will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.

Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies.

When a sub recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the LADOTD will submit to the FTA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.

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

Transit Providers

With every grant application, the Public Transportation Section obtains:

- A nondiscrimination assurance
- A list of any active lawsuits or complaints naming the potential grantee that allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits
- A list of all pending applications for financial assistance and all financial assistance currently provided by other federal agencies
- A summary of all civil rights compliance review activities conducted during the last three years.

The summary includes:

- Purpose or reason for review
- Name of organization performing the review
- Summary of findings and recommendations of the review
- Report on the findings and recommendations of the review

The Public Transportation Section includes specific language in each grant agreement which states that the grantee shall include the civil rights laws and regulations compliance in each subcontract financed in or whole or in part with federal assistance provided by FTA, modified only if necessary to identify the affected parties.

The Public Transportation Section maintains a file of all such reports and requires that the grantees have such records available for review by LADOTD or FTA.

The Public Transportation Section obtains and reviews Title VI Program Plans for each of its subrecipients every three years. To assist the subrecipients in developing the Title VI programs, the Public Transportation Section developed a plan template and provided training in plan development to subrecipients. Ongoing technical assistance is available for subrecipients.

The Public Transportation Section conducts triennial compliance reviews that address implementation of Title VI plans and compliance with Title VI requirements. The site visits enable the Region Program Manager to provide one-on-one technical assistance and provide an opportunity for determining whether subrecipients need to update the Title VI plans.

Chapter 13: Title VI Equity Analysis for Construction

LADOTD and subrecipients have not constructed transit facilities in the last three years and do not have plans for identifying or constructing facilities in the next period. If LADOTD were to change plans the NEPA process will be utilized to determine if any adverse impacts might result from federally funded transportation projects. LADOTD will follow the appropriate Title VI Analysis on projects during the planning phase and submit to FTA.

Chapter 14: State Program Requirements

LADOTD uses updated U.S. Census Bureau data to identify the distribution of minority populations across the state and combines it with updated FTA funding allocations to identify potential disparate transportation funding impacts statewide.¹ The following analysis updates the 2022 report which found that several census tracts may experience a disparate impact, with several census tracts with over 50% minority populations receiving less than \$20 of FTA funding per capita. Several of the identified census tracts are located in rural parishes that receive little or no federal transit funding, often due to limited local and parish matching resources required to access FTA programs.

This updated analysis identified 116 census tracts out of 1,366 total² as potentially experiencing a disparate funding impact, based on minority population of over 50% and receiving less than \$20 in FTA funding per capita. These tracts are distributed across the state, but parishes experiencing the greatest potential disparate impact include St. Landry, St. Mary, Iberia, Caddo, and East Baton Rouge. As LADOTD evaluates FTA funding distribution and transit support statewide, data at the

¹ *Minority population refers to the population identifying themselves as either "Hispanic or Latino" or any race other than "White alone"*

² *Water-only census tracts were excluded from this analysis.*

census tract and parish levels will direct them to areas receiving lower per-capita transit funding. This data allows them to work with these areas to identify ways to mitigate and reduce these gaps through supporting growth in local transit programs.

Minority Population

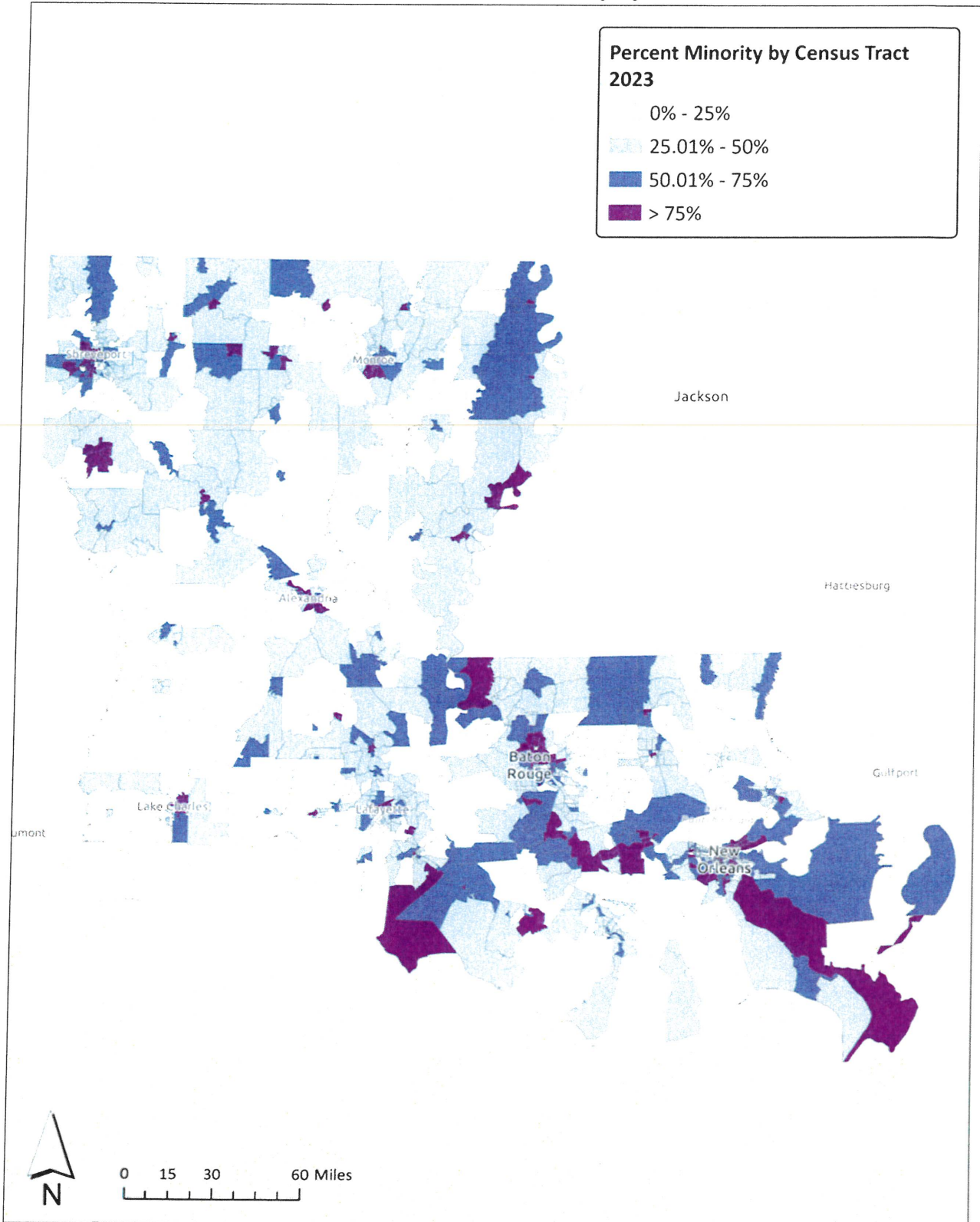
The Louisiana statewide minority population is 43.77%, out of a statewide total estimate of 4,619,080 people.³ This analysis identified 543 census tracts with a minority population of over 50% to gauge the distribution of funds in these areas. Census tracts within the three most populous parishes (East Baton Rouge, Jefferson, and Orleans) account for 37% of Louisiana’s minority population but only 16% of the State’s total population.

Parishes with the highest percent minority population include the following: East Carroll, Orleans, St. John the Baptist, Madison, Tensas, East Baton Rouge, Caddo, St. Helena, Claiborne, Iberville, Morehouse, Jefferson, and St. James, all with 50% or more minority populations. Of these parishes, all but East Carroll, Tensas, and Morehouse received federal funding, although both East Carroll and Tensas have populations below 8,000 people.⁴ Figure 1 shows the percentage of minority population by census tract in Louisiana.

³ U.S. Census Bureau (2023), ACS 5-Year Estimates: Detailed Tables, Table B03002.

⁴ Some agencies listed as receiving no funding may still receive limited support through agencies that primarily serve one parish but also provide services in others. As a result, federal estimates shown as zero may not fully capture all minor or indirect funding.

Figure 1: Louisiana Percent Minority by Census Tract



Source: U.S. Census Bureau (2023), ACS 5-Year Estimates: Detailed Tables, Table B03002. DCCM (2025).

Federal Funding Distribution

This analysis includes FTA funding allocations across Louisiana from 2023-2025. Funding includes Sections 5307, 5310, 5311, and 5316 program funds, as well as capital program funding.^{5,6}

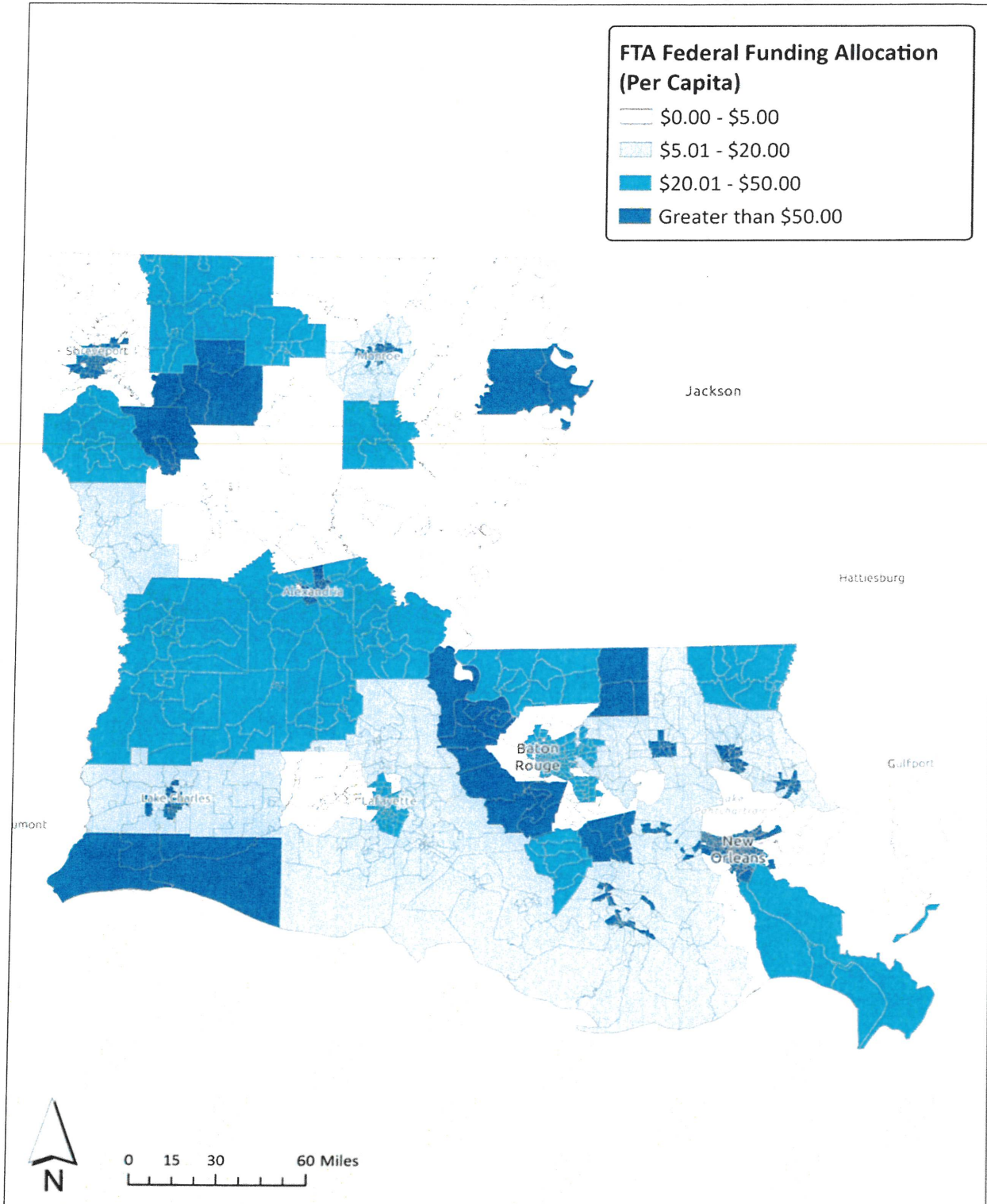
Figure 2 shows the estimated FTA funding allocation per census tract per capita. Overall, rural parishes tend to receive less federal transit funding compared to parishes with greater local resources and matching fund capacity. While most parishes received some level of FTA funding during the analysis period, the following parishes did not receive federal funding: Acadia, Catahoula, Concordia, East Carroll, Franklin, Grant, Jackson, LaSalle, Morehouse, Natchitoches, Richland, Tensas, Union, West Carroll, or Winn Parish.⁷

⁵ Section 5307 apportionments from the National Transit Database were available for the partial year for 2025. Urbanized Area Formula Grants - 5307 | FTA

⁶ Total funding includes distributions from 2023–2025. With the exception of Section 5307 funds, program and capital funding were attributed at the parish level to estimate agency service areas. For multi-parish providers (River Parishes Transit Authority and ARC of Greater New Orleans), funding was divided by population of served parishes. Section 5307 Urbanized Area funds were allocated by population across census tracts to best estimate areas within respective UZA boundaries. Total estimated funding per census tract was divided by 2023 population estimates to calculate per capita values.

⁷ Some agencies listed as receiving no funding may still receive limited support through agencies that primarily serve one parish but also provide services in others. As a result, federal estimates shown as zero may not fully capture all minor or indirect funding.

Figure 2: FTA Federal Funding by Census Tract (Per Capita)



Source: U.S. Census Bureau (2023), ACS 5-Year Estimates: Detailed Tables, Table B03002; LADOTD (2023-2025) capital program funding, 5311, 5316, and 5310 program funding; National Transit Database (2023-2024, 2025 partial year), 5307 Apportionments. DCCM (2025).

Disparate Impacts Analysis

Of the 543 census tracts with minority populations exceeding 50%, 116 were estimated to receive less than \$20 in FTA funding per capita during the 2023–2025 period. This is an increase from the 101 tracts identified in the previous 2020-2022 analysis. These census tracts, listed in Table 1, have been identified as experiencing a potential disparate impact due to the per capita federal funding received.

Several of the identified census tracts are located in rural parishes that receive little or no federal transit funding, often due to limited local and parish matching resources required to access FTA programs. While these funding patterns may reflect local capacity constraints rather than LADOTD policy decisions, they highlight geographic areas with limited access to transit investment. When local partners propose projects to provide public transit services in these areas, LADOTD can prioritize those projects to help close identified funding gaps.

Census tracts within urbanized areas generally receive higher levels of transit funding through Section 5307 Urbanized Area apportionments. For areas with little federal funding that may be due to low population, LADOTD may have additional opportunities to coordinate with partners to develop resources through the human services coordination process or by establishing funding coordinator positions in these areas. This distinction between urban and rural funding availability contributes to observed differences in per capita funding and provides important context for interpreting the results of the disparate impact analysis.

Figure 3 shows the census tracts identified as potentially experiencing a disparate impact based on percent minority population and per capita federal funding.

Table 1: Census Tracts with Greater than 50% Minority Population and Less than \$20 Funding per Capita

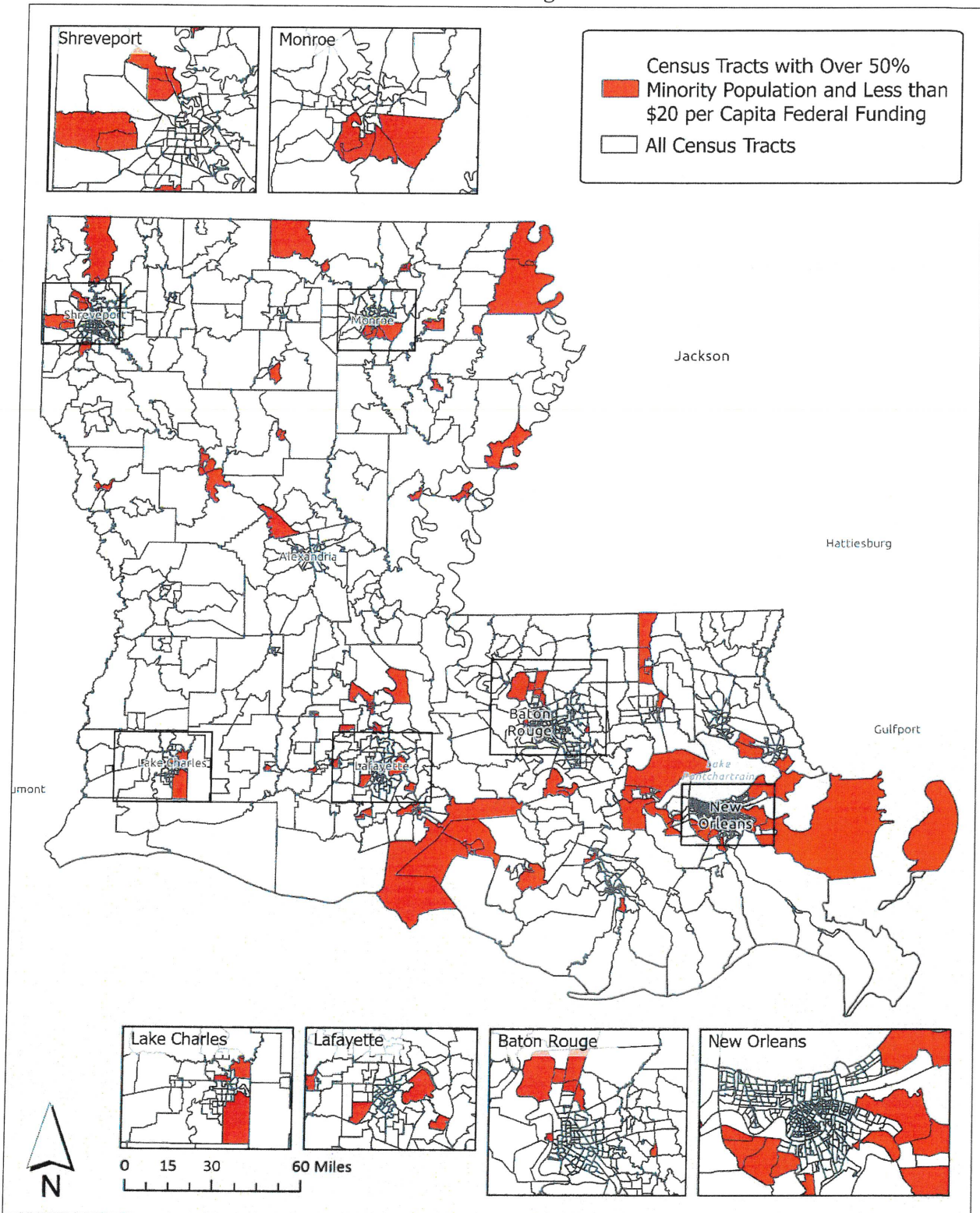
2023 Louisiana Census Tract	Parish	Population	Minority Population	% Minority	Funding per Capita
Census Tract 9601.02	Acadia	2523	1618	64.13%	\$0.00
Census Tract 9607	Acadia	3677	2301	62.58%	\$0.00
Census Tract 9609.02	Acadia	1045	806	77.13%	\$0.00
Census Tract 309	Ascension	4189	3296	78.68%	\$1.96
Census Tract 310.02	Ascension	3213	2670	83.10%	\$1.96
Census Tract 310.01	Ascension	2037	1130	55.47%	\$1.96
Census Tract 112.01	Bossier	4033	2165	53.68%	\$0.48
Census Tract 111.07	Bossier	2181	1210	55.48%	\$0.48
Census Tract 243.06	Caddo	3360	2744	81.67%	\$0.00
Census Tract 243.05	Caddo	2335	1524	65.27%	\$0.00
Census Tract 245.03	Caddo	4980	2586	51.93%	\$0.00
Census Tract 241.02	Caddo	3505	1810	51.64%	\$0.00
Census Tract 246.01	Caddo	5408	4737	87.59%	\$0.00
Census Tract 247	Caddo	1706	929	54.45%	\$0.00
Census Tract 14.01	Calcasieu	3097	2633	85.02%	\$9.88
Census Tract 2	Calcasieu	1170	1112	95.04%	\$9.88
Census Tract 17	Calcasieu	12059	7043	58.40%	\$9.88
Census Tract 2	Catahoula	1809	1293	71.48%	\$0.00
Census Tract 2.02	Concordia	2716	2068	76.14%	\$0.00
Census Tract 2.01	Concordia	2641	1604	60.73%	\$0.00
Census Tract 46.03	East Baton Rouge	6259	3776	60.33%	\$0.00
Census Tract 32.02	East Baton Rouge	3178	2591	81.53%	\$0.00
Census Tract 42.04	East Baton Rouge	4425	3500	79.10%	\$0.00
Census Tract 46.02	East Baton Rouge	6966	4117	59.10%	\$0.00
Census Tract 46.06	East Baton Rouge	6340	3241	51.12%	\$0.00
Census Tract 2	East Carroll	2743	1609	58.66%	\$0.00
Census Tract 3	East Carroll	2348	2325	99.02%	\$0.00
Census Tract 1	East Carroll	2104	1172	55.70%	\$0.00
Census Tract 9503	Franklin	5150	2856	55.46%	\$0.00
Census Tract 203	Grant	2679	1499	55.95%	\$0.00
Census Tract 304.02	Iberia	2963	1596	53.86%	\$11.71
Census Tract 301.01	Iberia	4422	3049	68.95%	\$11.71
Census Tract 311.01	Iberia	3748	2564	68.41%	\$11.71
Census Tract 308	Iberia	1356	1345	99.19%	\$11.71
Census Tract 310	Iberia	2091	1914	91.54%	\$11.71
Census Tract 309	Iberia	3230	2424	75.05%	\$11.71
Census Tract 305	Iberia	4450	2327	52.29%	\$11.71
Census Tract 316	Iberia	2226	1688	75.83%	\$11.71
Census Tract 9704	Jackson	2758	1678	60.84%	\$0.00

2023 Louisiana Census Tract	Parish	Population	Minority Population	% Minority	Funding per Capita
Census Tract 278.19	Jefferson	3037	1819	59.89%	\$0.52
Census Tract 277.01	Jefferson	5375	5075	94.42%	\$0.52
Census Tract 275.02	Jefferson	4332	4296	99.17%	\$0.52
Census Tract 276.01	Jefferson	5525	3357	60.76%	\$0.52
Census Tract 276.02	Jefferson	3051	2786	91.31%	\$0.52
Census Tract 6	Jefferson Davis	2603	1345	51.67%	\$16.57
Census Tract 19.05	Lafayette	5506	2964	53.83%	\$2.83
Census Tract 408.13	Livingston	5414	3284	60.66%	\$9.16
Census Tract 9505	Morehouse	3907	2887	73.89%	\$0.00
Census Tract 9504	Morehouse	2593	2176	83.92%	\$0.00
Census Tract 9508	Morehouse	3757	3337	88.82%	\$0.00
Census Tract 9.01	Natchitoches	2537	1298	51.16%	\$0.00
Census Tract 6.01	Natchitoches	4526	3209	70.90%	\$0.00
Census Tract 6.02	Natchitoches	4281	2441	57.02%	\$0.00
Census Tract 4	Natchitoches	3821	3134	82.02%	\$0.00
Census Tract 7	Natchitoches	3173	2291	72.20%	\$0.00
Census Tract 17.58	Orleans	1752	1113	63.53%	\$1.57
Census Tract 6.17	Orleans	3464	3231	93.27%	\$1.57
Census Tract 6.12	Orleans	1500	913	60.87%	\$1.57
Census Tract 106.06	Ouachita	945	531	56.19%	\$6.98
Census Tract 106.05	Ouachita	4897	4242	86.62%	\$6.98
Census Tract 110	Ouachita	4841	4650	96.05%	\$6.98
Census Tract 111	Ouachita	3210	2448	76.26%	\$6.98
Census Tract 9701	Richland	2593	1537	59.27%	\$0.00
Census Tract 9705	Richland	4311	3226	74.83%	\$0.00
Census Tract 3	Sabine	2181	1466	67.22%	\$11.98
Census Tract 302.04	St. Bernard	3602	2626	72.90%	\$0.52
Census Tract 301.05	St. Bernard	100	52	52.00%	\$0.52
Census Tract 622	St. Charles	2454	1755	71.52%	\$13.84
Census Tract 627	St. Charles	4475	2493	55.71%	\$13.84
Census Tract 628	St. Charles	6193	3436	55.48%	\$13.84
Census Tract 706	St. John the Baptist	2216	1266	57.13%	\$19.62
Census Tract 701	St. John the Baptist	2615	1454	55.60%	\$19.62
Census Tract 711	St. John the Baptist	3175	2735	86.14%	\$19.62
Census Tract 705	St. John the Baptist	6440	5714	88.73%	\$19.62
Census Tract 9619	St. Landry	2748	1455	52.95%	\$13.27
Census Tract 9603	St. Landry	3517	1821	51.78%	\$13.27
Census Tract 9606.01	St. Landry	4324	3066	70.91%	\$13.27
Census Tract 9609.02	St. Landry	2436	1801	73.93%	\$13.27
Census Tract 9613.01	St. Landry	2227	1917	86.08%	\$13.27
Census Tract 9613.02	St. Landry	2845	2542	89.35%	\$13.27
Census Tract 9614.01	St. Landry	2121	1706	80.43%	\$13.27
Census Tract 9615.02	St. Landry	3142	1834	58.37%	\$13.27
Census Tract 9616.02	St. Landry	1465	1289	87.99%	\$13.27

2023 Louisiana Census Tract	Parish	Population	Minority Population	% Minority	Funding per Capita
Census Tract 9614.02	St. Landry	1130	1049	92.83%	\$13.27
Census Tract 9616.01	St. Landry	2275	2109	92.70%	\$13.27
Census Tract 9615.01	St. Landry	1854	1775	95.74%	\$13.27
Census Tract 205.04	St. Martin	2990	1843	61.64%	\$9.79
Census Tract 206.02	St. Martin	2317	1768	76.31%	\$9.79
Census Tract 413	St. Mary	2118	1171	55.29%	\$12.07
Census Tract 414	St. Mary	2601	1657	63.71%	\$12.07
Census Tract 416	St. Mary	1938	1353	69.81%	\$12.07
Census Tract 403	St. Mary	2611	1322	50.63%	\$12.07
Census Tract 411	St. Mary	1166	815	69.90%	\$12.07
Census Tract 401	St. Mary	2760	2211	80.11%	\$12.07
Census Tract 410	St. Mary	3252	1750	53.81%	\$12.07
Census Tract 407	St. Mary	3310	1921	58.04%	\$12.07
Census Tract 412	St. Mary	1570	1215	77.39%	\$12.07
Census Tract 408.07	St. Tammany	6728	4000	59.45%	\$8.83
Census Tract 412.13	St. Tammany	5564	3152	56.65%	\$8.83
Census Tract 412.02	St. Tammany	1735	985	56.77%	\$8.83
Census Tract 9534.01	Tangipahoa	2844	1892	66.53%	\$11.70
Census Tract 9536.02	Tangipahoa	3377	2321	68.73%	\$11.70
Census Tract 9536.01	Tangipahoa	1957	1928	98.52%	\$11.70
Census Tract 9540.04	Tangipahoa	4455	2678	60.11%	\$11.70
Census Tract 9533	Tangipahoa	3653	2494	68.27%	\$11.70
Census Tract 3	Tensas	1490	1200	80.54%	\$0.00
Census Tract 13.01	Terrebonne	3455	1834	53.08%	\$13.60
Census Tract 1.04	Terrebonne	2379	1226	51.53%	\$13.60
Census Tract 9604	Union	3177	2390	75.23%	\$0.00
Census Tract 9602	Union	3320	1970	59.34%	\$0.00
Census Tract 9509.03	Vermilion	3457	1765	51.06%	\$5.43
Census Tract 9508	Vermilion	4172	2694	64.57%	\$5.43
Census Tract 9507	Vermilion	3248	2082	64.10%	\$5.43
Census Tract 201	West Baton Rouge	3978	2129	53.52%	\$0.00
Census Tract 9603	Winn	2177	1464	67.25%	\$0.00
Census Tract 9604	Winn	2280	1645	72.15%	\$0.00

Source: U.S. Census Bureau (2023), ACS 5-Year Estimates: Detailed Tables, Table B03002; LADOTD (2023-2025) capital program funding, 5311, 5316, and 5310 program funding; National Transit Database (2023-2024, 2025 partial year), 5307 Apportionments. DCCM (2025).

Figure 3: Census Tracts with Over 50% Minority Population and Less than \$20 per Capita Federal Funding



Source: U.S. Census Bureau (2023), ACS 5-Year Estimates: Detailed Tables, Table B03002; LADOTD (2023-2025) capital program funding, 5311, 5316, and 5310 program funding; National Transit Database (2023-2024, 2025 partial year), 5307 Apportionments. DCCM (2025).

Transportation Planning Process

As part of the statewide transportation planning process, LADOTD identifies the transportation needs of minority populations by providing these groups with full opportunities to become engaged at all points of the planning process. In order to engage minority communities in the current update to the Statewide Transportation Plan, LADOTD has implemented a robust Public Involvement Plan designed to make certain that the outcomes of the Plan reflect the needs of all Louisiana residents, including members of minority communities. This has involved a series of public outreach meetings conducted in geographically locations throughout the state that are designed to inform the public of the planning process, to receive input on the specific needs of various groups, and to validate the recommendations included in the plan. With the understanding that there are often times mobility, language, or other obstacles that make attending public meetings difficult, LADOTD has also collected public input through phone interviews and a comment form available on the LADOTD website.

In addition to public outreach, LADOTD relies on input from the Community Development and Enhancement Advisory Council to ensure that the transportation needs of minority communities are being identified as part of the statewide planning process. This group of public and private stakeholders was formed to provide technical input and to review Plan findings and recommendations through the lens of community development and enhancement, issues that can be especially relevant to minority communities.

FTA regulations governing Section 5310 funds (elderly and disabled transportation), Section 5311 funds (non-urban transportation) require that the state management plan include:

- A description of the process by which the state develops the annual program of project submitted to FTA as part of its Section 5311 grant application, especially the method used to ensure fair and equitable distribution of funds, including to Native American tribes where present.
- A description of the state's efforts to assist sub-recipients in applying for Section 5311 funds, especially any efforts made to assist minority applicants.
- A description of the state's criteria for selecting transit providers to participate in the program, especially its efforts to include sub-recipients serving significant minority populations.
- A description of the state's ongoing process to monitor sub-recipient's compliance with Title VI, such as ongoing site visits to each sub-recipient, review checklists, etc.

In addition, in order for LADOTD to assess compliance requirements, applicants must provide the following information in their application:

- A description of how the transportation needs of minorities will be served if the proposed project is approved for funding.
- A description of the special efforts taken to serve minority communities and address minority transit needs.
- The percentage of minorities in service area population and the percentage of minority users of the agency's transportation system.

Each applicant must provide the total population of the service area, the percentage which are minority, a map of the service area and special efforts taken to serve minority communities and address minority transit needs.

Chapter 15: Program Administration

Procedures to Pass Financial Assistance to Subrecipients

In order for FTA and LADOTD to assess compliance requirements, applicants must provide the following information in their Application.

1. A description of how the transportation needs of minorities will be served if the proposed project is approved for funding.
2. A description of the special efforts taken to serve minority communities and address minority transit needs.
3. The percentage of minorities in service area population and the percentage of minority users of the agency's transportation system.

Each applicant must provide the total population of the service area, the percentage which are minority, a map of the service area and special efforts taken to serve minority communities and address minority transit needs.

Grant Application Process, Timeline, and Program of Projects Development

Sections 5310 and 5311 Programs

The Louisiana Transit Electronic Awards Management (LA-TEAM) system is an online tool incorporated with the Statewide Transit Tracking and Reporting System (STTARS) for applicants applying for Sections 5310 and 5311 Programs. Help features are provided within the application.

This process operates as follows:

1. In July each year, LADOTD Public Transit releases the online application. Statewide public notice is issued by LADOTD announcing the funding opportunity, announced Coordination meetings, in areas of the state where there are no existing providers, eligible applicants which have formally indicated an interest in the program are notified of program opportunities and the potential availability of funding. All minority transit organizations that meet the eligibility criteria listed in State Management Plans are encouraged to apply and LADOTD assistance is available upon request. Such new requests are treated in accordance with the established priority system.

2. Existing and prospective new applicants prepare and submit complete applications through STTARS. State program personnel are available to provide assistance and advice to interested program participants.
3. Applications are submitted to LADOTD no later than November 1st in order to allow adequate processing time.
4. Pre-award accounting system surveys for any new applicants will be performed to ensure adequate financial and managerial capability. Based upon Federal funding levels and utilizing the most current Federal and State auditing requirements, LADOTD obtains an appropriate audit from all existing providers on an annual or biennial basis.
5. New Start Site Visits will be conducted prior to the approval of the application for any new applicants.
6. LADOTD Public Transportation Section program staff begin technical review and evaluation of applications as they are received. Recommendations for any necessary project revisions are completed together with proposed budget allocations for each project.
7. Applicants are required to publish public notices on proposed operating and/or capital project applications. The notices invite any interested public or private transit or paratransit operator within the service area to comment.
8. LADOTD submits a listing of projects and of all public and private transportation providers within each project service area to the U.S. Department of Labor for the Section 5311 applicants.
9. LADOTD finalizes its proposed Program of Projects and submits it to FTA by March 31.
10. FTA reviews and approves applications and awards grants by the end of July.
11. During the FTA review and approval process, LADOTD initiates and completes necessary contract agreements with applicants identified in the Program of Projects. Agreements become effective upon FTA approval.
12. For capital grant requests, LADOTD reviews and updates as needed the vehicle specifications. The Division of Administration initiates the procurement processes and LADOTD participates by attending pre-bid conferences.
13. Following issuance of bid awards by the Division of Administration, vehicles are ordered. Delivery of all vehicles is made to LADOTD for inspection and to insure conformance with vehicle specifications.

14. Prior to issuance, recipients provide LADOTD personnel with proof of insurance and submit payments for applicable title/handling fees. The face of each title is stamped to indicate that vehicles were purchased with Federal funds, and a restriction on the transfer of title without LADOTD concurrence is filed with the Louisiana Department of Public Safety and Corrections.

Section 5303/5304

FTA Section 5303 funds are distributed by formula to each of the MPOs annually once the apportionment is made to LADOTD via the Federal Register. Section 5304 funds are used by the Public Transportation Section.

Section 5339

LADOTD uses the statewide distribution to support small and large urban transit systems. The application is open to small and large urban programs for eligible bus and bus facility programs.

Procedures to Provide Technical Assistance to Subrecipients

The LADOTD Public Transportation Staff are available throughout the year to provide information to interested parties on procedures for participating in the program; technical advice and planning assistance on structuring individual project applications or budgets; and assistance in interpreting and complying with applicable regulatory provisions which pertain to any aspect of the program. Application assistance workshops are conducted each year at the Louisiana Public Transit Conference.

All minority transit organizations that meet the eligibility criteria listed the application are encourage to apply and LADOTD assistance is available upon request.

LADOTD develops model policies and templates to assist subrecipients with compliance with FTA requirements, including a Title VI plan template; drug and alcohol testing policy, Safety, Security and Emergency Preparedness Plans.

LADOTD's Public Transportation Section utilizes Rural Transportation Assistance Program (RTAP) funding to provide training, technical assistance, research and support services related to public transportation in non-urbanized areas. The State RTAP Advisory Committee will provide recommendations to LADOTD on how best these funds may be put to use by the State. A periodic needs survey will be conducted, generally during the Annual Public Transportation Conference, of the current providers to ensure that training and technical assistance is provided which address provider needs.

Section 5304 funds are available to MPOs for transit planning studies. LADOTD developed public transit human services transportation coordination plans for each MPO to assist in the developing the appropriate level of service in accordance with the demographic needs for each region.

Exhibit 1: LADOTD Compliance Section Organization Chart

