

**Federal Transit Administration
Non-Discrimination Program**

LARC, Inc

April 28, 2023

Non-Discrimination Plan Table of Contents


The LARC, Inc Non-Discrimination plan includes the following elements:

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Section 1: Non-Discrimination Plan Approval

Non-Discrimination Plan Adopted on: 6-22-2023

Adopted by: LARC, Inc. Board of Directors

Signature(s): 

Print Name of signature above Brian Hensgens

Print Title of signature above CEO

Date SIGNED: 6/26/23

Include documentation to show approval (i.e., minutes, resolutions, ordinance, etc.) The person given the authority to sign should be the person who actually signs the document.

Non-Discrimination Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

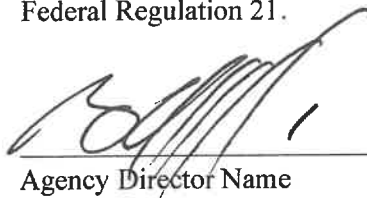
Section 2: Non-Discrimination Policy Statement

Policy Statement

The LARC, Inc 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. LARC, Inc 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.)

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



Agency Director Name

5/1/23
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 LARC, Inc may file a Non-Discrimination complaint by submitting the agency's Non-Discrimination Complaint Form.

For all Discrimination matters, please contact: Wade Vincent
303 New Hope Rd. Lafayette, La. 70506
Ph. #337-984-6110
wvincent@lafayettelarc.org



Leading the Way for Persons with Developmental Disabilities

Upon a motion by LARC Board of Directors President and a second by LARC Board of Directors' Secretary, the following policies in the Federal Transit Administration Non-Discrimination Program were approved by a vote of:

Yea: President Vice President Treasurer
Secretary Board Member Board Member
Board Member Board Member Board Member

Nay: Ø

- 1- Lobbying Policy ---Section A in Manual
- 2- Financial Policy---Section B in Manual
- 3- Preventative Maintenance Policy---Section C in Manual
- 4- Vehicle Maintenance Policy ---Section C in Manual
- 5- Wheel Chair Policy ---Section C in Manual
- 6- Non Discrimination Policy ---Will be added to Section O in Manual
- 7- ADA Policy---Section E in Manual
- 8- Hiring Process Policy ---Section F & G in Manual
- 9- School Bus Policy ---Section H in Manual
- 10- Charter Bus Policy ---Section H in Manual
- 11- Drug Free Workplace Policy ---Section I in Manual
- 12- Driver Training Policy ---Section J in Manual
- 13- SP, SSPP, CEMP Safety Policies---Section K in Manual
- 14- Accident Reporting Policy ---Section L in Manual

Date: June 22, 2023

Section 3: Notice to the Public

Non-Discrimination Notice to the Public

The LARC, Inc's Notice to the Public is as follows:

Notifying the Public of Rights Non-Discrimination

LARC, Inc

- ✓ The LARC, Inc operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with the LARC, Inc and should be filed within 180 days of date of alleged discrimination.
- ✓ For more information on the LARC, Inc's civil rights program, the procedures to file a complaint or to file a complaint contact, Wade Vincent at 337-984-6110, TTY 711 and Affiliated Blind, email wvincent@lafayettelarc.org; or visit our administrative office at 303 New Hope RD. Lafayette, La. 70506. For more information, visit www.lafayettelarc.org
- ✓ A complaint may also be filed directly with the:

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

Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 337-984-6110.
- ✓ The LARC, Inc adheres to requirements of the Americans with Disabilities Act (ADA) and makes every reasonable modification to its policies, practices and services to ensure accessibility for riders and will make reasonable modifications and/or accommodations upon request of a rider with a disability.
- ✓ For more information on reasonable accommodation please contact the LARC, Inc's civil rights program, the procedures to file a complaint or to file a complaint contact 337-984-6110, TTY 711; email wvincent@lafayettelarc.org; or visit our administrative office at 303 New Hope Rd. Lafayette, La.70506. For more information, visit www.lafayettelarc.org

The **Insert LARC, Inc** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

Notificación al público de derechos bajo el no discriminación

- El LARC, Inc opera sus programas y servicios sin distinción de raza, color y origen nacional, según el no discriminación. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI o no discriminación puede presentar una queja con el LARC, Inc.
- Para obtener más información sobre el programa de derechos civiles de LARC, Inc, o para obtener más información sobre los procedimientos para presentar una queja llame al 337-984-6110, wvincent@lafayettelarc.org o visite nuestra oficina administrativa en 303 New Hope Rd. Lafayette, La.70506.
- Un demandante puede presentar una queja directamente a la el Departmet de Transporte del estado de Louisiana, llame al (225) 379-1923. Email Cynthia.douglas@la.gov,
- Un demandante puede presentar una queja directamente a la Administración Federal de tránsito, Oficina de Derechos Civiles, Atención: Coordinadora del Programa Título VI, edificio este, 5 piso-TCR, 1200 New Jersey Ave., se Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 337-984-6110.
- El LARC, Inc se adhiere a los requisitos de la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) y realiza todas las modificaciones razonables a sus políticas, prácticas y servicios para garantizar la accesibilidad de los pasajeros y realizará modificaciones y/o adaptaciones razonables a pedido de un pasajero con una discapacidad.
- Para obtener más información sobre adaptaciones razonables, comuníquese con el programa de derechos civiles de Nombre de la agencia, los procedimientos para presentar una queja o para presentar una queja comuníquese con 337-984-6110, TTY 711; correo electrónico wvincent@lafayettelarc.org; o visite nuestra oficina administrativa en 303 New Hope Rd. Lafayette, La. 70506. Para obtener más información, visite www.lafayettelarc.org

Section 4: Non-Discrimination Complaint Procedure

The LARC, Inc's Non-Discrimination Complaint Procedure is made available in the following locations:

Wade Vincent

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

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin or disability by the LARC, Inc may file a non-discrimination complaint by completing and submitting the agency's non-discrimination Complaint Form. File initial complaint with Wade Vincent at LARC, Inc

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 LARC, Inc 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 LARC, Inc will review it to determine if our office has jurisdiction. (A copy of each non-discrimination complaint received will be forwarded to the Louisiana Department of Transportation and Development within ten (10) calendar days of receipt.) The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The LARC, Inc has 45 days to investigate the complaint. If more information is needed to resolve the case, the LARC, Inc 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 or other discriminatory violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

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

LADOTD will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

If information is needed in another language, contact 337-984-6110.
LARC, Inc, 303 New Hope Rd. Lafayette, La. 70506.
Wade Vincent, Human Resource Manager

Procedimiento de Queja sin discriminación

El Formulario de queja por discriminación del LARC, Inc

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

Cualquier persona, grupo de individuos o entidad que crea haber sido objeto de discriminación por motivos de raza, color, nacionalidad o discapacidad por el LARC, Inc puede presentar la queja llenando y enviando este formulario de queja por discriminación a la agencia correspondiente. (Este documento debe ser enviado a la dirección. Presente la queja inicial con Wade Vincent, Human Resource Manager en LARC, Inc.)

Cualquier individuo que haya presentado o participado en la investigación de alguna queja no debe ser sujeto a ninguna forma de intimidación o represalia. Aquel individuo que considere que haya sido sujeto a intimidación o represalias puede llenar un formulario de queja para represalias siguiendo este mismo procedimiento.

Esta queja deberá ser presentada a la Oficina de Programas de Cumplimiento del LARC, Inc en un periodo de no mas de 180 días después de lo siguiente:

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

Una vez que se reciba la queja, la oficina de LARC, Inc lo revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de notificación comunicando si la queja será investigada por nuestra oficina.

El/La coordinadora de la oficina de LARC, Inc tendrá 45 días para investigar la queja. Si se necesita más información para resolver el caso, el (la) Coordinador (a) podría contactar al demandante.

Después de que el (la) Coordinador revise la queja, emitirá una de dos (2) cartas al demandante

- Una carta de cierre resumiendo las alegaciones del caso en la cual indicará que no hubo una violación de discriminación y por tal motivo el caso será cerrado.
- Una carta de hallazgo resumiendo las alegaciones y las entrevistas sobre el supuesto incidente en esta misma carta se le explicará al demandante si se llevara a cabo alguna acción disciplinaria, entrenamiento adicional al personal o se tomara alguna otra acción necesaria.

Si el demandante desea apelar la decisión, el tendrá 180 días después de la fecha marcada en la carta de cierre o de la carta de hallazgo para hacerlo. El/La Coordinador, Cynthia Douglas (225) 379-1923

Título VI / ADA analizará los hechos del caso y emitirá su conclusión al apelante en un periodo de 60 días después de haber recibido la apelación.

Si necesita información en otro idioma, póngase en contacto con 337-984-6110.
LARC, Inc 303 New Hope Rd. Lafayette, La. 70506
Wade Vincent, Human Resource Manager

Section 6: List of Transit Related Non-Discrimination Investigations, Complaints and Lawsuits

The LARC, Inc maintains a list or log of all non-discrimination investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One

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

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

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

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

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

Public Outreach Activities

The public outreach and involvement activities conducted by the LARC, Inc since the last Non-Discrimination Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below.

Event Date	LARC, Inc Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
Nov. 30 th - Dec. 23 rd	Karen Davis Volunteers	Noel Acadien Aue Village	Social Media, Radio, Television and Posters	Yearly function
Mardi Gras Day and throughout the year	Nicole Buller	Mardi Gras Bead Collection	Social Media, Radio, Television and posters	Yearly function

Section 8: Language Assistance Plan

Plan Components

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

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

The LARC, Inc's Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

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

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

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

Factor 2: The frequency with which LEP persons come into contact with the program. Identifies and assesses the frequency LARC, Inc's staff comes into contact with LEP persons. Examples of contact could include:

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

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

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

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

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

Item #1 – Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i>

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

The LARC, Inc's staff reviewed the American Community Survey data <https://www.census.gov/programs-surveys/acs> and determined that 5,795 (11.3%) persons in *Lafayette Parish* speak a language other than English. In *Lafayette Parish*, of the 890 persons with limited English proficiency, 497 (28.2%) speak Spanish.

Lafayette, Louisiana				
	Total	Percent	Limited English-speaking households	Percent limited English-speaking households
Label				
All households	51,150	(X)	890	1.7%
Households speaking --				
Spanish	1,762	3.4%	497	28.2%
Other Indo-European languages	2,781	5.4%	265	9.5%
Asian and Pacific Island languages	712	1.4%	128	18.0%
Other languages	540	1.1%	0	0.0%

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

LARC, Inc assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. LARC, Inc provides approximately 26,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the LADOTD, if needed, to ensure the individual receives access to the transit services.

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

All of LARC, Inc's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The LARC, Inc 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 LARC, Inc will strive to provide alternative but meaningfully accessibility. Moreover, the LARC, Inc continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

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

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

The LARC, Inc has identified, developed, and uses the following:

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

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

In order to ensure that LEP individuals are aware of LARC, Inc's language assistance measures, LARC, Inc provides the following:

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

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

LARC, Inc will continue to update the LEP plan as required by U.S. DOT. At a minimum, the plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the 2020 U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the LARC, Inc service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.

- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether LARC, Inc's financial resources are sufficient to fund language assistance resources needed.
- Determine whether LARC, Inc has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning LARC, Inc's failure to meet the needs of LEP individuals

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

The following training will continue to be provided to LARC, Inc staff:

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

Limited English Proficient (LEP) Resource Materials:

LEP Policy

LARC, Inc shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Local Government and school districts to obtain translators. The agency will also utilize web based translator programs if available.

If you need help with English, please call 337-984-6110.

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

Si usted necesita ayuda con el inglés, por favor llame 337-984-6110.

“I Speak” Language Identification Card

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

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

Log of LEP Encounters

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

Section 9: Minority Representation Information

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

A. Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	13		1			

B. Efforts to Encourage Minority Participation

The current Board members are encouraged to solicit members during open elections, including minority members. Additionally we encourage anyone interested in becoming Board members to inform LARC of their interest, minority members are always welcomed.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other LARC, Incs here)

LARC, Inc monitors subrecipients using the following process:

1. LARC, Inc uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA C4702.1B: (document the process here)
2. LARC, Inc collects non-discriminations programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 11: Equity Analysis

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

No, the agency has not built a facility.

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

Section 12: Requirements for Metropolitan Planning Organizations (MPOs)

NA

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

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