

Policy of Nondiscrimination and Compliance with Federal Civil Rights Laws

I. PURPOSE

As a recipient of Federal Financial Assistance from the U.S. Department of Homeland Security (DHS) and other applicable Federal Administrations, this policy is to affirm that the Port of New Orleans (Port NOLA) complies with Federal Civil Rights Laws and is committed to providing its programs and services without discrimination, specifically in accordance with:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including language).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Educations Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.
- U.S. Department of Homeland Security regulations 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.

Copies of this policy will be posted on the Port NOLA website where employees, members of the public, clients, customers, and program participants will have access.

II. APPLICABILITY

This policy applies to all programs and services of the Port of New Orleans.

III. POLICY STATEMENT

In conjunction with other equal opportunity and nondiscrimination policies, Port NOLA firmly believes in, and is committed to the principles and practices of equal opportunity and nondiscrimination in regards to race, color, national origin (including language), disability, sex, age, or religion. Accountability in achieving the objectives of the Policy will be shared by all Port NOLA management.

IV. RESPONSIBILITY

Responsibility for administering this policy and processing discrimination complaints will be with the Chief People & Culture Officer. Administering duties shall include, but not be limited to, the following:

- Develop and update nondiscrimination and Civil Rights policies and procedures.
- Distribution of this policy.
- Receiving, addressing, and monitoring complaints.
- Reporting as required, and as needed for the overall policy and program maintenance and efficacy.

V. TITLE VI COMPLAINT PROCESS

A Title VI complaint may be filed by any individual (employee, member of the public, client, customer, program participant) who believes he or she has been subjected to discrimination based on race, color, national origin, disability, age, sex or religion. A formal, signed, written Title VI complaint form must be filed within 180 days of the alleged act of discrimination. A copy of this policy and a copy of the complaint form can be found on the Port NOLA website, www.portnola.com. The complaint should be submitted to:

Chief People & Culture Officer, Garri Brown
garri.brown@portnola.com
P.O. Box 60046
New Orleans, LA 70160

Complaints can also be filed with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties at e-mail: CRCLCompliance@hq.dhs.gov, which is the fastest method, or FAX: 202-401-4708, or mail: U.S. Dept. of Homeland Security, Office for Civil Rights and Civil Liberties Compliance Branch, 245 Murray Lane, SW, Building 410, Mail Stop #0190, Washington, D.C. 20528. For additional information visit: www.dhs.gov/crcl or call [202-401-1474](tel:202-401-1474) or toll-free 1-866-644-8360.

Upon the receipt of a complaint or a report of alleged discrimination, a prompt and thorough investigation shall be conducted, adhering to the terms of this policy, and the complainant will be kept informed if additional information is needed, how the investigation is progressing, and the results of the investigation. All investigations will be logged by the Chief People & Culture Officer, documenting the name and address of the complainant, nature of the complaint, date of submission and results of the investigation. Port NOLA's goal is to address complaints within 90 days of receipt, though the time to carefully investigate complaints may be longer depending on the nature of the complaint, date of submission and results of the investigation.

In the event there is a determination that discrimination has occurred, Port NOLA will assess what remedial steps are required to address and correct the discriminatory conduct.

Port NOLA recognizes that confidentiality is important to all parties involved in a discrimination investigation. Confidentiality will be maintained to the extent possible; however, it cannot be guaranteed.

Port NOLA will not tolerate retaliation for initiating, pursuing, or assisting with a complaint of alleged discrimination to Port NOLA or to any government agency.

VI. LANGUAGE ACCESS POLICY (LAP)

The Port of New Orleans has developed this LAP to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. The Port of New Orleans' jurisdiction, which includes Jefferson, Orleans and St. Bernard Parishes, is comprised of a diverse multicultural

population whose prominent secondary languages include Spanish and Vietnamese, as evidenced by 126,000 Spanish and 18,500 Vietnamese speaking individuals within the region. To date, Port NOLA has had no requests for interpreters and no requests for translated program documents. A person who does not speak English as his/her primary language and who has a limited ability to read, write, speak or understand English may be entitled to language assistance with respect to Port NOLA programs and services. These services can include interpretation (oral or spoken transfer of a message from one language into another) and/ or translation (the written transfer of a message from one language into another language). Port NOLA will determine when interpretation and/or translation services are needed and reasonable. Port NOLA will strive to offer the following measures:

1. Port NOLA will take reasonable steps to provide the opportunity for meaningful access to LEP persons who have difficulty communicating in English.
2. If an individual asks for language assistance and Port NOLA staff determines that the individual is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. Port NOLA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
3. Port NOLA will periodically assess needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the individual.
4. When an interpreter is needed, Port NOLA will attempt to determine what specific language assistance is required:
 - Formal Interpreters – when necessary to provide meaningful access for LEP persons, Port NOLA will provide qualified interpreters.
 - Informal Interpreters - These include the family members, friends, legal guardians, service representatives or advocates of the LEP individual who may be used if deemed competent to provide these services. If an LEP individual wants to use his/her own informal interpreter, the LEP individual and interpreter may be required to sign a waiver of free interpreter services. Port NOLA reserves the right to also have a formal interpreter present.
5. Port NOLA has weighed the cost and benefits of regularly translating documents for potential LEP groups. Considering the expense of translating the documents, the barriers to meaningful translation, the frequent changes in documents, and the frequency of such requests, Port NOLA has determined that it is an unnecessary burden to have any documents translated. Port NOLA will monitor such requests to determine whether the need for document translation has changed.

If LEP services are required, please contact: Chief People & Culture Officer, Garri Brown, garri.brown@portnola.com (504) 528-3268. Requests should be made at least 72 hours prior to the need for the services. All requests for LEP services will be evaluated by the Chief People & Culture Officer and the requestor will be notified if LEP assistance will be provided. All requests will be logged by the Chief People & Culture Officer, documenting the number and type of requests received annually, the number of such requests that were denied, including reasons, and the types of alternate accommodations provided.

VII. Reasonable Accommodation

Port NOLA is committed to providing access to its programs and services without discrimination based on disability. Port NOLA will not:

- Deny a qualified person, on the basis of disability, the opportunity to participate in and benefit from programs and services.
- Impose eligibility criteria that screen out individuals on the basis of disability from participating in any program or service, unless the criteria are necessary for the provision of the program or service.

Upon request, Port NOLA will take the appropriate steps to provide assistance and services necessary to ensure effective communication for qualified people with disabilities, unless doing so would cause an undue burden or fundamental alteration for the Port. Examples of such services include sign language interpreters and written information in large text to communicate effectively to persons with disabilities.

If disability accommodation services are required, please contact: Chief People & Culture Officer, Garri Brown, garri.brown@portnola.com (504) 528-3268. Requests should be made at least 72 hours prior to the need for the services. All requests for accommodation services will be evaluated by the Chief People & Culture Officer and the requestor will be notified if accommodation services will be provided. All requests will be logged by the Chief People & Culture Officer, documenting the number and type of requests received annually, the number of such requests that were denied, including reasons, and the types of alternate accommodations provided

VIII. RELATED DOCUMENTS

- Title VI & ADA Complaint Form

IX. DOCUMENT REVIEW

Review every two years or as required by Federal Grant.

AUTHORIZATION:



Ronald Wendel Jr.
President and CEO

11/18/24

Date

Document History:

Date	Responsible Party	Summary
November 18, 2024	Ronald Wendel	Final Policy



**PORT OF NEW ORLEANS
TITLE VI AND ADA COMPLAINT FORM**

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
E-Mail Address:					
Accessible Format Requirements?	Large Print		Audio Tape		
	TDD		Other		
Section II:					
Are you filing this complaint on your own behalf?				Yes*	No
* If you answered "yes" to this question, go to Section III.					
If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for a third party:					
Please confirm that you have obtained 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):					
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Sex <input type="checkbox"/> Religion					
Date of Alleged Discrimination (Month, Day, Year): _____					
<p>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 back of this form.</p>					



Section IV:

Have you previously filed a Title VI complaint with this agency?	Yes	No
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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 _____ | () State Agency _____ |
| () Federal Court _____ | () Local Agency _____ |
| () State Court _____ | |

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 _____

Please submit this form to:
 Chief People & Culture Officer
 P.O. Box 60046
 New Orleans, LA 70160
 or
 human.resources@portnola.com