Madison County - Robert "Bob" Harrison Senior Wellness & Advocacy Center

TITLE VI PROGRAM

April 22, 2015

Madison County Commission
100 Northside Square
Huntsville, AL 35801
256.532.3492

Madison County Commission - District 6 Office
3210 Hi-Lo Circle, Suite B
Huntsville, AL 35811
256.532.1505
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Robert "Bob" Harrison Senior Wellness & Advocacy Center
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I. Policy Statement

The Madison County Commission is a recipient of Federal Transit Administration (FTA) funds to support transit services at the Madison County – Robert "Bob" Harrison Senior Wellness and Advocacy Center (MC-RHSWAC). The Madison County Commission ensures compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, Part 21, and related statutes and regulations to the end that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d) including the denial of meaning access for Limited English Proficient (LEP) persons in the delivery of transit services at the MC-RHSWAC.

The purpose of this plan is to assist the MC-RHSWAC in its administration and management of Title VI related activities. The MC-RHSWAC's Title VI Coordinator is Jermie Howell, Madison County Personnel Director. He can be contacted at 256-532-3614 and/or jhowell@madisoncountyal.gov.

II. Notice to the Public

The MC-RHSWAC has developed a Title VI Notice to provide information to the public regarding the MC-RHSWAC's Title VI obligations and to inform the public of the protections against discrimination afforded to them by Title VI. The notice also includes contact information to file a discrimination complaint with the MC-RHSWAC as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The MC-RHSWAC has posted the Title VI Notice on the agency's website and in public areas of the agency's office(s) including the receptionist area and meeting rooms. The notice is also posted in all transit vehicles. This notice will be translated into languages other than English as needed. A copy of the notice is included as Appendix A.

III. Complaint Procedures and Form

A Title VI complaint may be filed by any individual or individuals who allege that he or she has been subjected to discrimination or adverse impact under any FTA funded program or activity based on race, color, or national origin. The MC-RHSWAC has adopted Title VI complaint procedures for investigating and tracking complaints. A formal, signed, written Title VI complaint form must be filed within 180 days of the date of the alleged act of discrimination. A copy of the complaint form is included in Appendix B. The complaint procedures and complaint form are also posted on the MC-RHSWAC's website at www.madisoncountyal.gov (follow the links to the District Six office). If information is needed in another language, complainant can contact 256.532.1505. Si se necesita información en otro idioma, denunciante puede contactar 256.532.1505.Completed forms should be submitted to:

Jermie Howell, Personnel Director
Madison County
100 Northside Square
Huntsville, Alabama 35801
256-532-3614 Office
256-532-3322 Fax
jhowell@madisoncountyal.gov

Once the complaint is received, the MC-RHSWAC will review it to determine who has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the MC-RHSWAC's office. The MC-RHSWAC will only process complaint forms that are complete.

In a situation where the complainant is unable or incapable of providing a written complaint, a verbal complaint of discrimination may be made to the MC-RHSWAC Under these circumstances, the complainant will be interviewed and the MC-RHSWAC will assist the complainant in converting the verbal allegations to a formal written complaint.

The MC-RHSWAC has 15 business days to investigate the complaint. If more information is needed to resolve the case, the MC-RHSWAC may contact the complainant. The complainant has 15 business days from the date of this letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, the MC-RHSWAC can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, she/he will issue one of two 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. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the accused staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the closure letter or the LOF to do so.

If the complainant is not satisfied with actions taken locally or if they demand further action, the complaint will be referred to Mr. Joe Nix, Alabama Department of Transportation, Modal Programs Bureau, 1100 John Overton Drive, Montgomery, Alabama 36110.

A person may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

IV. Transit-Related Investigations, Complaints, and Lawsuits

The MC-RHSWAC shall maintain a log of Title VI complaints received. The log shall include the date the complaint was filed, a summary of the allegations, the status of the

complaint, and actions taken in response to the complaint. Any transit related Title VI active investigations and lawsuits shall also be included in this log. This log shall be included in the Title VI Program that is submitted to ALDOT every three years.

There have been no Title VI transit-related investigations, complaints, or lawsuits received by the MC-RHSWAC. A copy of the Title VI Transit Investigations, Complaints, and Lawsuits Form that will be used if a complaint or lawsuit is filed can be found in Appendix C.

V. Public Participation Plan

The MC-RHSWAC is committed to providing early and continuous opportunities for public participation in the transportation decision making process. These opportunities are open to everyone including minority, low-income, and the Limited English Proficiency (LEP) populations. The Public Participation Plan provides for an open exchange of information and ideas between the public and transportation decision makers. The MC-RHSWAC's public participation program is ongoing and reviewed regularly in order to identify, meet, and serve the community's needs.

In an effort to more fully integrate the opinions of minority, low-income, and LEP populations into community outreach activities, the MC-RHSWAC's public participation program will:

- Continue to coordinate with community-based organizations to identify and implement strategies to reach out to members in the affected minority, low-income, and LEP communities.
- Reduce barriers to public participation from these segments of the population.
- Place public notices on its websites, in the receptionist areas, and on transit vehicles.
- Utilize the media (newspaper, radio, television, etc.) to notify the minority, low-income, and LEP populations of public involvement efforts.
- Provide opportunities for public participation through means other than written communication, such as personal interviews or the use of recording devices to capture oral comments.
- Hold public meetings in locations, facilities, and at meeting times that are convenient and accessible to the minority, low-income, and LEP populations.
- Ensure that the decision making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.
- Develop Title VI brochures in English and other languages as needed.
- Make public information available in electronically accessible formats.

To date, the MC-RHSWAC has participated in the following public outreach and

involvement activities:

- MC-RHSWAC staff members have attended local meetings to identify community needs.
- MC-RHSWAC staff members have participated in public outreach efforts. These outreach efforts include interactions at public open houses.
- MC-RHSWAC placed ads in "Speakin' Out News" a local weekly newspaper.
- MC-RHSWAC placed ads in "Valley Weekly" a local monthly newspaper.
- MC-RHSWAC maintains a monthly calendar of events, conducts social media campaigns and publishes a monthly newsletter.

VI.Limited English Proficient Plan

The Four Factor Analysis is used to identify Limited English Proficient (LEP) persons who need language assistance, outline how language assistance is provided, and describe how the MC-RHSWAC considers the needs of LEP persons. This assessment balances the following four factors:

A. The number or proportion of LEP persons eligible to be served or likely to be encountered by the MC-RHSWAC's program. In addition to the number or proportion of LEP persons served, the analysis identified:

   1. How LEP persons interact with the MC-RHSWAC
   2. Where LEP communities are located and the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
   3. The literacy skills of LEP populations in their native languages in order to determine whether document translation will be an effective practice; and
   4. Whether or not LEP persons are underserved by the MC-RHSWAC due to language barriers.

B. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:

   1. Bus Drivers;
   2. Information Line;
   3. Receptionist/Clerks;
   4. Annual Events

C. The nature and importance of the MC-RHSWAC's program to people's lives.

D. The resources available for LEP outreach and the costs associated with that outreach.

The MC-RHSWAC has developed a Limited English Proficiency Plan which is located in Appendix D. It includes:

- Results of the Four Factor Analysis, including a description of the LEP population(s) served;
- A description of how language assistance services will be provided;
- The methods used by the MC-RHSWAC to provide language assistance services;
- A description of how employees are trained to provide timely and reasonable language assistance to LEP populations;
- A description of how notice is provided to LEP persons about the availability of language assistance; and
- An explanation of how the plan is monitored, evaluated, and updated.

Safe Harbor Provision

In accordance with the Safe Harbor Provision, the MC-RHSWAC has identified that no language groups exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be served by the program. The MC-RHSWAC focuses translation efforts in Spanish which is the largest language group other than English. Vital documents such as public notices, complaint forms, and complaint procedures will be available in Spanish. The MC-RHSWAC also provides free translation services upon request.

VII. Minority Representation on Planning and Advisory Bodies

The MC-RHSWAC will not deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program on the grounds of race, color, or national origin.

The MC-RHSWAC does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by the MC-RHSWAC. If the MC-RHSWAC establishes such boards or committees, a table will be used to depict the racial breakdown of the membership of those committees and will be included in future Title VI programs (see Appendix E). In addition, a description of efforts made to encourage the participation of minorities on such committees will be included.

VIII. Guidance on Determining Site or Location of Facilities

The MC-RHSWAC has no construction projects scheduled. In the event that the MC-RHSWAC decides to acquire land and/or construct facilities, the MC-RHSWAC shall not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any transit federally funded program based on the grounds of race, color, or national origin. The MC-RHSWAC shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

The MC-RHSWAC will complete a Title VI equity analysis during the planning state of any new facility with regard to where it is to be located or sited to ensure the location is selected without regard to race, color, or national origin. Wherever necessary, needed, and/or required, the MC-RHSWAC will engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis will compare the equity impacts of various alternatives and will occur before the selection of preferred sites. A copy of the Title VI Construction Project Analysis can be found in Appendix F.

IX. Additional Title VI Information

Additional Title VI information is included in Appendix G.

X. Board Meeting Resolution of Approved Title VI Program

The Madison County Commission approved the Title VI program for the MC-RHSWAC on April 22, 2015. A copy of the **AUTHORIZING RESOLUTION** is included as Appendix H.

Appendix A

Title VI Notice to the Public

TITLE VI NOTICE OF PROTECTION AGAINST DISCRIMINATION

MC-RHSWAC operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the MC-RHSWAC.

For more information on the civil rights program and the procedures to file a complaint, contact:
Madison County Robert "Bob" Harrison
Senior Wellness and Advocacy Center
3210 Hi-Lo Circle, Suite B, Huntsville, Alabama 35811
256-532-1505 Office
www.madisoncountyal.gov

A complaint may be filed directly with the Federal Transit Administration by contacting:
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, then contact 256-532-1505.
si se necesita información en otro idioma, póngase en contacto con 256-532-1505.

Appendix B

Title VI Complaint Form

Section I		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Section II		
Are you filing this complaint on your own behalf? Circle	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

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? Circle	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 Agency _____

[ ] State Court _____ [ ] 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:

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

Madison County Robert "Bob" Harrison Senior Wellness and Advocacy Center
3210 Hi-Lo Circle, Suite B, Huntsville, Alabama 35811

Formulario de Quejas del Título VI

Sección I:		
Nombre:		
Dirección:		
Teléfono (Casa):	**Teléfono (trabajo):**	
Dirección de correo electrónico:		
Sección II:		
¿Está usted presentando esta queja en su nombre? Círculo	Sí	No
* Si usted contestó "sí" a esta pregunta, pase a la **Sección III.**		
Si no es así, por favor proporcione el nombre y la relación de la persona a la que usted se queja:		
Por favor, explique por qué se ha declarado en una tercera parte:		
Por favor confirme que 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):		
[ ] Carrera	[ ] Color	[ ] Origen Nacional
Fecha de la discriminación alegada (Mes, Día, Año): _____		
Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya 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 se necesita más espacio, por favor use el reverso de este formulario._____		
Sección IV		

Ha previamente presentado una queja del Título VI con esta agencia? Círculo	Sí	No
Sección V		
¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal? [ ] Si [ ] No En caso afirmativo, marque todo lo que corresponda: [ ] Agencia Federal:_____ [ ] Corte Federal_____ [ ] Agencia Estatal_____ [ ] Estado Corte_____ [ ] 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 de queja es en contra:		
Persona de contacto:		
Título:		
Número de teléfono:		

Adjunte cualquier material escrito o cualquier otra información que usted considere relevante para su queja. Firma y fecha requerida abajo

_____ _____

Firma Fecha Fecha

Por favor envíe este formulario en persona en la dirección abajo, o envíe este formulario a:

Madison County Robert "Bob" Harrison Senior Wellness and Advocacy Center,
3210 Hi-Lo Circle, Suite B, Huntsville, Alabama 35811

Appendix C

List of Transit-Related Investigations, Complaints, and Lawsuits

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

Appendix D
Demographics

To obtain demographic information on persons who speak English less than well, data was obtained from the 2008-2012 American Community Survey 5-Year Estimates. An estimated 313,850 people reside in Madison County. Spanish is the primary language of persons who speak English less than well.

B16001 LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND
OVER
Universe: Population 5 years and over
2008-2012 American Community Survey 5-Year Estimates

Madison County, Alabama/Estimate Margin of Error
Total: 313,850 +/-28
Speak only English 291,722 +/-1,084

Spanish or Spanish Creole: 10,240 +/-635
Speak English "very well" 5,272 +/-548
Speak English less than "very well" 4,968 +/-575

French (incl. Patois, Cajun): 888 +/-233
Speak English "very well" 789 +/-228
Speak English less than "very well" 99 +/-46

French Creole: 127 +/-78
Speak English "very well" 108 +/-72
Speak English less than "very well" 19 +/-31

Italian: 355 +/-236
Speak English "very well" 268 +/-205
Speak English less than "very well" 87 +/-68

Portuguese or Portuguese Creole: 87 +/-70
Speak English "very well" 60 +/-56
Speak English less than "very well" 27 +/-32

German: 1,774 +/-364
Speak English "very well" 1,603 +/-336
Speak English less than "very well" 171 +/-92

Yiddish: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28

Other West Germanic languages: 111 +/-70
Speak English "very well" 81 +/-55
Speak English less than "very well" 30 +/-34

Scandinavian languages: 15 +/-22
Speak English "very well" 15 +/-22
Speak English less than "very well" 0 +/-28

Greek: 110 +/-80
Speak English "very well" 102 +/-79
Speak English less than "very well" 8 +/-12

Russian: 159 +/-91
Speak English "very well" 118 +/-73
Speak English less than "very well" 41 +/-38
Polish: 63 +/-68
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Speak English "very well" 44 +/-62
Speak English less than "very well" 19 +/-26

Serbo-Croatian: 8 +/-13
Speak English "very well" 8 +/-13
Speak English less than "very well" 0 +/-28

Other Slavic languages: 158 +/-109
Speak English "very well" 123 +/-99
Speak English less than "very well" 35 +/-33

Armenian: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28

Persian: 148 +/-107
Speak English "very well" 64 +/-47
Speak English less than "very well" 84 +/-82

Gujarati: 242 +/-134
Speak English "very well" 160 +/-108
Speak English less than "very well" 82 +/-67

Hindi: 561 +/-240
Speak English "very well" 445 +/-198
Speak English less than "very well" 116 +/-79

Urdu: 175 +/-185
Speak English "very well" 130 +/-138
Speak English less than "very well" 45 +/-50

Other Indic languages: 572 +/-212
Speak English "very well" 366 +/-151
Speak English less than "very well" 206 +/-141

Other Indo-European languages: 127 +/-98
Speak English "very well" 116 +/-96
Speak English less than "very well" 11 +/-20

Chinese: 1,245 +/-439
Speak English "very well" 639 +/-268
Speak English less than "very well" 606 +/-255

Japanese: 360 +/-221
Speak English "very well" 122 +/-87
Speak English less than "very well" 238 +/-169

Korean: 813 +/-221
Speak English "very well" 519 +/-188
Speak English less than "very well" 294 +/-99

Mon-Khmer, Cambodian: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28

Hmong: 69 +/-108
Speak English "very well" 37 +/-59
Speak English less than "very well" 32 +/-50

Thai: 139 +/-110
Speak English "very well" 44 +/-59
Speak English less than "very well" 95 +/-82

Laotian: 104 +/-104
Speak English "very well" 70 +/-66
Speak English less than "very well" 34 +/-50

Vietnamese: 719 +/-284
Speak English "very well" 307 +/-127

Speak English less than "very well" 412 +/-204

Other Asian languages: 534 +/-229
Speak English "very well" 355 +/-147
Speak English less than "very well" 179 +/-151

Tagalog: 489 +/-179
Speak English "very well" 421 +/-168
Speak English less than "very well" 68 +/-54

Other Pacific Island languages: 238 +/-117
Speak English "very well" 199 +/-116
Speak English less than "very well" 39 +/-39

Navajo: 4 +/-7
Speak English "very well" 4 +/-7
Speak English less than "very well" 0 +/-28

Other Native North American languages: 66 +/-58
Speak English "very well" 58 +/-54
Speak English less than "very well" 8 +/-11

Hungarian: 8 +/-12
Speak English "very well" 8 +/-12
Speak English less than "very well" 0 +/-28

Arabic: 673 +/-388
Speak English "very well" 499 +/-332
Speak English less than "very well" 174 +/-160

Hebrew: 24 +/-25
Speak English "very well" 24 +/-25
Speak English less than "very well" 0 +/-28

African languages: 709 +/-256
Speak English "very well" 669 +/-246
Speak English less than "very well" 40 +/-34

Other and unspecified languages: 14 +/-23
Speak English "very well" 14 +/-23
Speak English less than "very well" 0 +/-28

LIMITED ENGLISH PROFICIENCY ASSESSMENT

(Assessment provided as a tool to assist with demographics & Four Factor Analysis.)

Provider:	Madison County – Robert "Bob" Harrison Senior Wellness and Advocacy Center
Date Completed:	September 18, 2014

1. Examine Census Data at
http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t

1) Select *TOPICS – PEOPLE - LANGUAGE – ENGLISH USAGE*
2) Select *GEOGRAPHIES –CENSUS TRACT*
3) Select the *STATE* from the drop-down menu
4) Select the *COUNTY* from the drop-down menu
5) Click on *ALL CENSUS TRACTS WITHIN . . . COUNTY*
6) Click *ADD TO YOUR SELECTIONS*
7) From the *SELECTION RESULTS* on the right side of the screen, check the box for the table B16001 - *LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER (Use the 3 year estimate.)*
8) The table will present a breakdown of the languages spoken in the state and identify the population estimate that speaks the language and their ability to speak English or speak English less than "very well".
9) Add up all geographically relevant census tracts for the population estimates that speak English less than "very well".

City/County	Population	Population that Speaks English Less than Very Well (Number)	Population that Speaks English Less than Very Well (as Percent of Total Population)	Language/Languages Spoken by "Speak English Less Than Very Well" Population
Madison County	313,850	8,267	2.63%	Spanish (1.58%), Chinese, German, Korean, Vietnamese, French, Italian, Portuguese, Russian, Polish, Persian, Hindi, Thai, Arabic, and other languages

1. Survey your drivers. Do they indicate that there is a need for language assistance for riders? If so, which languages?	No.
2. Survey your receptionist, customer service representative, and schedule/dispatcher. Do they indicate that there is a need for language assistance for riders? If so, which languages?	No.

3. Contact major employers. Do they indicate a need for language assistance for potential transit users? If so, which languages?

Employer	Response
	MC-RHSWAC does not transport to major employers.

4. Contact human service agencies. Do they indicate a need for language assistance for potential transit users? If so, which languages?

Agency	Response
CASA of Madison County	Ann Anderson – Executive Director – No.
ARC of Madison County	Susan Klingel – Executive Director – No.
Mental Health Center of Madison County	Maxie Kirk – Recovery Services Program Manager – No.
Phoenix	Renee Pace – Case Manager – No.
Department of Human Resources	Alicia Bill – JOBS Program Supervisor – No. (DHR has FLS, Inc. on contract if needed.)
Huntsville Madison County Senior Center	Tom Glynn – Executive Director - No

5. Contact local towns and cities, including the police departments. Do they indicate a need for language assistance for potential transit users? If so, which languages?

Town/City/Department	Response
Madison County Sheriff's Office	Lt. Kerry Phillips – No.
Town of Gurley	Tawnie Bryant, City Clerk – No.
New Hope Police Department	Captain Vick – No.
Madison County Senior Rx	Jill Swinford – Project Coordinator – No.
Huntsville Transit and MARS	Kim Smith - No

6. Contact the local school systems. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
School System	**Response**
Huntsville City Schools	Ann Marie Batisita – some not a high number
Madison City Schools	Judy Warmouth - no
Madison County Schools	Sarah Threlkelv, Lead Teacher, Madison County Schools English Language Program – No issue in county. Less than ½% of the school system student population speaks English less that well.
7. Contact the local churches. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Church	**Response**
Wall Highway Baptist Church	Linda Davis – Administrative Assistant – No
Plainview Church of Christ	Rhonda Crumrine – Secretary – No
Union Hill Primitive Baptist Church	Linda Readus – Administrative Assistant - No
Locust Grove Baptist Church	Linda Hill – Secretary – contact with 3 families in last 6 months that did not speak English well, had family members who could provide language assistance.
8. Inventory second languages spoken by staff.	None
9. Do the responses indicate a need for language assistance for potential transit users? If so, which languages? If yes, please prepare and submit an LEP plan.	No.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Madison County Commission
100 Northside Square
Huntsville, AL 35801
256.532.3492

Madison County Commission - District 6 Office
3210 Hi-Lo Circle, Suite B
Huntsville, AL 35811
256.532.1505
www.madisoncountyal.gov

Robert "Bob" Harrison Senior Wellness & Advocacy Center
6156 Pulaski Pike
Huntsville, AL 35811
256.519.2040

Introduction

This Limited English Proficiency Plan (LEP) has been prepared to address the MC-RHSWAC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, et seq. and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Plan Summary

The MC-RHSWAC has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access transit services provided by the MC-RHSWAC. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how the MC-RHSWAC identifies a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how LEP persons are notified that assistance is available.

In order to prepare this plan, the MC-RHSWAC undertook the U.S. DOT Four Factor Analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a MC-RHSWAC program, activity, or service.

2. The frequency with which LEP persons come into contact with the MC-RHSWAC's programs, activities, or services.

3. The nature and importance of programs, activities, or services provided by the MC-RHSWAC to the LEP population.

4. The resources available to the MC-RHSWAC and the overall cost to provide LEP assistance.

Four Factor Analysis

1. ***The number or proportion of LEP persons in the service area who may be served or are likely to encounter a MC-RHSWAC program, activity, or service.***

   The MC-RHSWAC reviewed the 2008-2012 American Community Survey (U.S. Census) and determined that the total population for Madison County is 313,850 and 22,128 persons (7%) speak a language other than English. Of those persons, 8,267

(2.6%) residents report speaking English less than very well. Those persons with limited English proficiency are in the following groups: 4,968 speak Spanish or Spanish-Creole, 606 speak Chinese, and 2,693 speak other languages. The most popular language spoken at home is Spanish. The MC-RHSWAC will likely encounter more Spanish speaking persons that benefit from its programs than any other LEP persons.

2. ***The frequency with which LEP persons come into contact with the MC-RHSWAC's programs, activities, or services.***

The MC-RHSWAC assessed the frequency with which staff and drivers have contact with LEP persons, both presently and in the past. The following contact points and frequencies have been identified:

CONTACT POINTS	FREQUENCY
Bus Drivers	Minimum
Information Line	Minimum
Receptionist/Clerks	Minimum
Annual Events	Minimum

3. ***The nature and importance of programs, activities, or services provided by the MC-RHSWAC to the LEP population.***

The Harrison Center (Center) serves the seniors of Madison County. The free ride to and from the Center provides many of them access to a hot, nutritious reduced cost meal served daily at the Center. The vehicles are maintained by the county which makes them safe and reliable at no additional expense to the seniors. About ¾ of the seniors who ride the vehicles do not have a car and this is their only way to the Center. The Harrison Center focuses on fitness of body and mind with an emphasis on fun. Features Olympic-size swimming pool, hot tub, indoor rubberized track and exercise equipment and much more.

The largest geographic concentration of LEP individuals in the MC-RHSWAC's service area is Spanish speaking residents. These residents are often dependent upon our specialized transportation services. It is also likely that the MC-RHSWAC will encounter LEP individuals at community outreach events.

4. ***The resources available to the MC-RHSWAC and the overall cost to provide LEP assistance.***

The MC-RHSWAC assessed and identified resources that could be used for providing LEP assistance and which documents would be most valuable if translated into other languages and the cost associated with this effort. An inventory of available organizations with which the MC-RHSWAC could partner for outreach and translation efforts was also identified. In addition, bilingual staff, volunteer community agencies, and web based translation services were identified as ways to reduce the cost of translation services.

Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise the MC-RHSWAC's LEP PLAN:

1. Identifying LEP Individuals Requiring Language Assistance
2. Providing Language Assistance
3. Training Staff
4. Providing Notice to LEP Persons
5. Monitoring and Updating the LEP Plan

1. Identifying LEP Individuals Requiring Language Assistance

The MC-RHSWAC identifies an LEP person who requires language assistance by:

- Examining customer service records to identify language assistance that has been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed for similar future situations.

- Regularly surveying drivers and other first line staff who have direct or indirect contact with LEP individuals.

- Assigning a staff person to greet participants as they arrive at MC-RHSWAC sponsored events. By engaging participants in conversation, it is possible to informally gauge each attendee's ability to speak and understand English.

- Providing Language Identification Flash Cards at public meetings.

2. Providing Language Assistance

The MC-RHSWAC assists an LEP person who requires language assistance by:

- Networking with local human service organizations that provide service to LEP individuals and seeking opportunities to provide information on the MC-RHSWAC's programs and services through these organizations.

- Posting the MC-RHSWAC's Title VI Notice, Complaint Procedures, Complaint Form, and LEP Plan on the agency's website.

- Identifying in-house staff with other language abilities to assist with translation services.

- Public notices, publications, and other printed materials (including webpage content) may be made available in other languages if requested.

- Placing statements in notices and publications to notify LEP persons that free language interpreter services are available for meetings with a seven day advance notice.

- Providing Language Identification Flash Cards onboard the MC-RHSWAC's fleet and at the Administrative Office.

- Utilizing a web-based translation service application such as Google Translate.

3. Training Staff

The MC-RHSWAC will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Providing staff with a description of language assistance services offered by the MC-RHSWAC.

- Providing staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI / LEP complaint.

- Instructing staff on the use of Language Identification Flash Cards.

4. Providing Notice to LEP Persons

The MC-RHSWAC will provide notice to LEP persons in both oral and written communications by:

- Offering general information on the MC-RHSWAC's website.

- Providing the following written communications in both English and Spanish:

  - Onboard fliers containing information about route changes, rider alerts, fare increases, and public hearings;

  - Title VI Notice, Complaint Procedures, and Complaint Form.

5. Monitoring and Updating the LEP Plan

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services should be made accessible for LEP persons and to monitor changes in demographics and types of services.

The MC-RHSWAC will update the LEP Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the most recent U.S.

Census is made available, when clear and higher concentrations of LEP individuals are present in the MC-RHSWAC's service area, and/or during the process of updating Title VI Program.

The MC-RHSWAC will monitor and update its LEP Plan by:

- Determining how the needs of LEP persons have been addressed.
- Determining the current LEP population in the service area and whether the need for translation services has changed.
- Determining whether local language assistance programs have been effective and sufficient to meet the need.
- Determining whether the MC-RHSWAC's financial resources are sufficient to fund the needed language assistance efforts.
- Determining whether the MC-RHSWAC has fully complied with the goals of the LEP Plan.
- Determining whether complaints have been received concerning the MC-RHSWAC's failure to meet the needs of LEP individuals.

Dissemination of the MC-RHSWAC's LEP Plan

The LEP Plan will be disseminated to customers and the community by:

- Publishing the LEP Plan and the Title VI Plan on the MC-RHSWAC's website so that any person or agency with internet access can view and download these plans. Alternatively, any person or agency may also request a copy of the plan at no cost via telephone, fax, mail, or in person. LEP individuals may request that these plans be translated into various languages. If feasible, the MC-RHSWAC will accommodate such requests.
- Distributing the LEP Plan to human service organizations in the service area.

Questions or comments regarding the LEP Plan may be submitted to the MC-RHSWAC at the following address:

Madison County Commission - District 6 Office
3210 Hi-Lo Circle, Suite B
Huntsville, AL 35811
256.532.1505
www.madisoncountyal.gov

Robert "Bob" Harrison Senior Wellness & Advocacy Center
6156 Pulaski Pike
Huntsville, AL 35811
256.519.2040

Appendix E

Table Depicting Minority Representation on Planning and Advisory Bodies

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
Name of Committee					
Name of Committee					
Name of Committee					

Appendix F

Title VI Construction Project Analysis

Name of Agency:_____
Contact Person:_____
Mailing Address:_____
City/State/Zip Code:_____
Contact Person:_____Title_____
Phone: _____ Fax _____
E-Mail Address: _____

1. Describe the low-income and minority populations within the area affected by the construction project and the method used to identify these populations.

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

2. Describe the adverse effects of the project both during and after construction that would affect the identified minority and low-income populations and minority-owned businesses.

_____
_____
_____
_____
_____
_____
_____
_____
_____

3. Provide a detailed list of all minority-owned businesses and households that will be affected by the construction project.

_____
_____
_____
_____
_____
_____

4. Describe the potential negative environmental impact, such as noise, air, or water pollution.

5. Describe the relocation program and/or other measures adopted by the subrecipient that will be used to mitigate any identified adverse social, economic, or environmental effect of the proposed construction project.

6. For each of the identified low income or minority communities, discuss the positive effects such as an improvement in transit service, mobility, or accessibility.

7. Describe all mitigation and environment enhancement actions incorporated into the project to address the adverse effects, including any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and replacement of community resources destroyed by the project.

8. Describe the remaining effects, if any, and why further mitigation is not proposed.

9. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, provide a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. If there is no basis for such a comparison, describe why that is so.

Appendix G

Additional Title VI Information

All subrecipients must address each of the following:

1. Describe all pending applications for financial assistance currently provided by other Federal agencies to the applicant.

   U. S. Department of Agriculture through the Alabama Department of Education; U. S. Department of Justice through the Alabama Department of Economic and Community Affairs; U. S. Election Assistance Commission through the State of Alabama Secretary of State; and U. S. Department of Homeland Security through the Alabama Department of Homeland Security.

2. Summarize all civil rights compliance reviews conducted by other local, state or federal agencies during the last three years. (Include the reason for review, name of agency performed the review, and report on the status of findings or recommendations.)

   None

3. Is your agency considered a minority organization: ____Yes ___x_No

   If yes, check the category(ies) that apply.

   ___ Black American
   ___ Hispanic American
   ___ Native American
   ___ Sub-Continent Asian-American
   ___ Asian-Pacific American
   ___ Other

4. Does your agency provide transportation services to minority communities?
   _x__Yes ___ No

   If yes, check the category(ies) that apply.

   _x__ Black American
   _x_ Hispanic American
   _x__ Native American
   _x__ Sub-Continent Asian-American
   _x_ Asian-Pacific American
   __x_ Other

5. Has your Title VI Coordinator/EEO Officer changed during the reporting period or since your last Title VI Plan was approved? If yes, please provide the name and contact information for the new coordinator/EEO Office.

   Jermie Howell, Personnel Director
   Madison County
   100 Northside Square
   Huntsville, AL 35801
   256.532.3614
   personnel@madisoncountyal.gov

6. Has your organization had any projects and/or service changes that have Title VI, Limited English Proficiency (LEP), or Environmental Justice (EJ) impacts?

   NO

   If yes, please complete the following items:

   a. Provide a brief description of these projects/service changes.

   b. What did you do to ensure that populations affected by the project and/or service change had meaningful access to and involvement in the development process?

   c. What is the number of percentage of LEP or EJ populations affected by the project and/or service change?

Appendix H

RESOLUTION ADOPTING A TITLE VI PLAN

STATE OF ALABAMA

MADISON COUNTY

RESOLUTION OF THE MADISON COUNTY COMMISSION

WHEREAS, Madison County, Alabama, is a recipient of federal financial assistance from the Alabama Department of Transportation in support of transit services at the Madison County Robert "Bob" Harrison Senior Wellness and Advocacy Center (the "Center"); and

WHEREAS, the receipt of federal financial assistance imposes certain obligations upon Madison County, including complying with Title VI of the Civil Rights Act of 1964; and

WHEREAS, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving federal financial assistance; and

WHEREAS, Madison County commits to assure that no person shall, on the basis 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 (PL 100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity regardless of the funding source.

NOW, THEREFORE, BE IT RESOLVED BY THE MADISON COUNTY COMMISSION as follows:

1. In furtherance of Madison County's commitment to comply with the requirements of Title VI of the Civil Rights Act of 1964, the Madison County Commission adopts and approves the Title VI Program for the Center attached hereto as Exhibit "A;" and

2. The Madison County Personnel Director, in his capacity, shall serve as the Title VI Officer and is authorized to revise and update the plan as necessary.

DONE this 22nd day of April, 2015.

MADISON COUNTY COMMISSION

Dale W. Strong
Chairman

ATTEST:

Kevin Jones
County Administrator