

# **Limestone County Commission**

## **TITLE VI PROGRAM**

February 17, 2015

310 West Washington Street  
Athens, AL 35611  
256-233-6400  
[www.limestonecounty-al.gov](http://www.limestonecounty-al.gov)

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## **I. Policy Statement**

The Limestone 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.

The purpose of this plan is to assist the Limestone County Commission in its administration and management of Title VI related activities. The Limestone County Commission’s Title VI Coordinator is Sonya Anthony, Grant Coordinator. She can be contacted at 256-233-6400 and/or [sonya.anthony@limestonecounty-al.gov](mailto:sonya.anthony@limestonecounty-al.gov).

## **II. Notice to the Public**

The Limestone County Commission has developed a Title VI Notice to provide information to the public regarding the Limestone County Commission’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 Limestone County Commission as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The Limestone County Commission 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 Limestone County Commission 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 Limestone County Commission’s website\*. Completed forms should be submitted to:

Sonya Anthony  
Grant Coordinator  
Limestone County Commission  
310 West Washington Street  
Athens, AL 35611  
256-233-6400  
256-233-6403 Fax  
sonya.anthony@limestonecounty-al.gov

Once the complaint is received, the Limestone County Commission 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 Limestone County Commission's office. The Limestone County Commission 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 Limestone County Commission. Under these circumstances, the complainant will be interviewed and the Limestone County Commission will assist the complainant in converting the verbal allegations to a formal written complaint.

The Limestone County Commission has 15 business days to investigate the complaint. If more information is needed to resolve the case, the Limestone County Commission 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 Limestone County Commission 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.

\*If information is needed in another language, complainant can contact 256-233-6400.

#### **IV. Transit-Related Investigations, Complaints, and Lawsuits**

The Limestone County Commission 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 Limestone County Commission. 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 Limestone County Commission 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 Limestone County Commission'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 Limestone County Commission's public participation program will:

- 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 the County website, in the County receptionist area, on Kidney transportation vehicle, and at Dialysis facilities.
- Utilize the media (newspaper) to notify the minority, low-income, and LEP populations of public involvement efforts.

- 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 Limestone County Commission has participated in the following public outreach and involvement activities:

- Public notices have been posted on the County website, in the County receptionist area, on the Kidney van, and at Dialysis facilities.
- Title VI brochures have been developed in English.

## **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 Limestone County Commission 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 Limestone County Commission's program. In addition to the number or proportion of LEP persons served, the analysis identified:
  1. How LEP persons interact with the Limestone County Commission;
  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 Limestone County Commission due to language barriers.
- B. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:
  1. Kidney Van Driver
  2. Information Line (Dialysis Facility)

3. Dispatchers (Dialysis Facility and Hospital)
  4. Reservationist (Dialysis Facility)
  5. Receptionist (Dialysis Facility and Limestone County Commission)
- C. The nature and importance of the Limestone County Commission's program to people's lives.
- D. The resources available for LEP outreach and the costs associated with that outreach.

The Limestone County Commission 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 Limestone County Commission 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.

In accordance with the Safe Harbor Provision, the Limestone County Commission has identified that the 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

## **VII. Minority Representation on Planning and Advisory Bodies**

The Limestone County Commission 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 Limestone County Commission does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by the Limestone County Commission. If the Limestone County Commission 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 Limestone County Commission has no construction projects scheduled. In the event that the Limestone County Commission decides to acquire land and/or construct facilities, the Limestone County Commission 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 Limestone County Commission shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

The Limestone County Commission 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 Limestone County Commission 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 Limestone County Commission Board of Directors approved the Title VI program on February 17, 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**

Limestone County Commission 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 Limestone County Commission.

For more information on the civil rights program and the procedures to file a complaint, contact:

**Limestone County Commission  
310 West Washington Street  
Athens, AL 35611  
256-233-6400  
[www.limestonecounty-al.gov](http://www.limestonecounty-al.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, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE  
Washington DC 20590**

**If information is needed in another language, then contact  
256-233-6400**

## Appendix B

### Title VI Complaint Form

|   |                   |    |
|---|-------------------|----|
| <b>Section I</b>  |                   |    |
| Name:   |                   |    |
| Address:  |                   |    |
| Telephone (Home):   | Telephone (Work): |    |
| Electronic Mail Address:  |                   |    |
| <b>Section II</b>   |                   |    |
| Are you filing this complaint on your own behalf? Circle  | Yes               | No |
| If you answered "yes" to this question, go to <b>Section III</b> .  |                   |    |
| 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 |
| <b>Section III</b>  |                   |    |
| 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   |                   |    |
| 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. |                   |    |
|   |                   |    |
|   |                   |    |
|   |                   |    |
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|   |                   |    |
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|   |                   |    |
|   |                   |    |

|   |     |    |
|---|-----|----|
| <b>Section IV</b>   |     |    |
| Have you previously filed a Title VI complaint with this agency? Circle   | Yes | No |
| <b>Section V</b>  |     |    |
| Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?   |     |    |
| <input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, check all that apply:<br><input type="checkbox"/> Federal Agency: _____<br><input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____<br><input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____ |     |    |
| Please provide information about a contact person at the agency/court where the complaint was filed.  |     |    |
| Name:   |     |    |
| Title:  |     |    |
| Agency:   |     |    |
| Address:  |     |    |
| Telephone:  |     |    |
| <b>Section VI</b>   |     |    |
| 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:

Sonya Anthony  
 Limestone County Commission  
 310 West Washington Street  
 Athens, AL 35611

# Appendix C

## List of Transit-Related Investigations, Complaints, and Lawsuits

|  | Investigation<br>Number | Investigation<br>Title | Status | Date |
|--|-------------------------|------------------------|--------|------|
|  |                         |                        |        |      |
|  |                         |                        |        |      |
|  |                         |                        |        |      |
|  |                         |                        |        |      |
|  |                         |                        |        |      |
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|  |                         |                        |        |      |
|  |                         |                        |        |      |
|  |                         |                        |        |      |
|  |                         |                        |        |      |

# Appendix D

## Demographics

State of Alabama  
Language Spoken At Home per County  
Speak English less than "very well"  
Based on Census 2010 Data and  
2007-2011 American Community Survey

| Area Name        | Population<br>6 Years<br>and Older | # Population                            |                       |              | % Speak              |                    |                           | # Speak                   |                             |                             | % Speak |                             |       |
|------------------|------------------------------------|---|-----------------------|--------------|----------------------|--------------------|---------------------------|---------------------------|-----------------------------|-----------------------------|---------|-----------------------------|-------|
|                  |                                    | Speak English<br>Less Than<br>Very Well | Speak English<br>Well | % Population | Spanish or<br>Creole | Spanish/<br>Creole | Other<br>Indo<br>European | Other<br>Indo<br>European | Asian-<br>Pacific<br>Island | Asian-<br>Pacific<br>Island | Other   | Asian-<br>Pacific<br>Island | Other |
| State of Alabama | 4,443,763                          | 105,317                                 | 2,40%                 | 78,384       | 1.80%                | 7,446              | 0.20%                     | 17,119                    | 0.40%                       | 2,358                       | 0.10%   | 0.10%                       |       |
| County           |                                    |   |                       |              |                      |                    |                           |                           |                             |                             |         |                             |       |
| Autauga          | 50,376                             | 543                                     | 1.10%                 | 333          | 0.70%                | 49                 | 0.10%                     | 144                       | 0.30%                       | 17                          | 0.00%   | 0.00%                       |       |
| Baldwin          | 185,414                            | 4,100                                   | 2.40%                 | 2,963        | 1.80%                | 445                | 0.30%                     | 639                       | 0.40%                       | 53                          | 0.00%   | 0.00%                       |       |
| Barbour          | 25,877                             | 519                                     | 0.20%                 | 387          | 1.50%                | 26                 | 0.10%                     | 96                        | 0.40%                       | -                           | 0.00%   | 0.00%                       |       |
| Bibb             | 21,439                             | 172                                     | 0.80%                 | 123          | 0.60%                | -                  | 0.00%                     | 49                        | 0.20%                       | -                           | 0.00%   | 0.00%                       |       |
| Blount           | 53,539                             | 2,243                                   | 4.20%                 | 2,143        | 4.00%                | 77                 | 0.10%                     | 23                        | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Bullock          | 10,206                             | 321                                     | 3.10%                 | 321          | 3.10%                | -                  | 0.00%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Butler           | 19,512                             | 111                                     | 0.80%                 | 51           | 0.30%                | 19                 | 0.10%                     | 41                        | 0.20%                       | -                           | 0.00%   | 0.00%                       |       |
| Calhoun          | 110,409                            | 1,902                                   | 1.70%                 | 1,516        | 1.40%                | 162                | 0.10%                     | 200                       | 0.20%                       | 24                          | 0.00%   | 0.00%                       |       |
| Chambers         | 32,366                             | 209                                     | 0.80%                 | 138          | 0.40%                | 22                 | 0.10%                     | 49                        | 0.20%                       | -                           | 0.00%   | 0.00%                       |       |
| Cherokee         | 24,515                             | 67                                      | 0.30%                 | 26           | 0.1%                 | -                  | 0.00%                     | 23                        | 0.10%                       | 18                          | 0.10%   | 0.10%                       |       |
| Chilton          | 40,445                             | 1,436                                   | 3.80%                 | 1,358        | 3.40%                | 16                 | 0.00%                     | 56                        | 0.10%                       | 6                           | 0.00%   | 0.00%                       |       |
| Choctaw          | 13,178                             | 10                                      | 0.10%                 | 10           | 0.00                 | -                  | 0.00%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Clarke           | 24,522                             | 59                                      | 0.20%                 | 24           | 0.10%                | -                  | 0.00%                     | 35                        | 0.10%                       | -                           | 0.00%   | 0.00%                       |       |
| Clay             | 13,211                             | 255                                     | 1.90%                 | 244          | 1.80%                | 11                 | 0.10%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Cleburne         | 13,942                             | 159                                     | 1.10%                 | 159          | 1.10%                | -                  | 0.00%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Coffee           | 45,929                             | 1,403                                   | 3.10%                 | 1,051        | 2.30%                | 59                 | 0.10%                     | 293                       | 0.80%                       | -                           | 0.00%   | 0.00%                       |       |
| Colbert          | 51,382                             | 640                                     | 1.20%                 | 561          | 1.10%                | 24                 | 0.00%                     | 55                        | 0.10%                       | -                           | 0.00%   | 0.00%                       |       |
| Conecuh          | 12,488                             | 51                                      | 0.40%                 | 51           | 0.40%                | -                  | 0.00%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Coosa            | 10,753                             | 57                                      | 0.50%                 | 37           | 0.30%                | 20                 | 0.20%                     | -                         | 0.00%                       | -                           | 0.00%   | 0.00%                       |       |
| Covington        | 35,464                             | 418                                     | 1.20%                 | 279          | 0.80%                | 20                 | 0.10%                     | 119                       | 0.30%                       | -                           | 0.00%   | 0.00%                       |       |
| Crenshaw         | 13,085                             | 214                                     | 1.80%                 | 108          | 0.80%                | -                  | 0.00%                     | 106                       | 0.80%                       | -                           | 0.00%   | 0.00%                       |       |
| Cullman          | 75,324                             | 1,721                                   | 2.30%                 | 1,441        | 1.90%                | 84                 | 0.10%                     | 193                       | 0.30%                       | 3                           | 0.00%   | 0.00%                       |       |
| Dale             | 46,237                             | 1,066                                   | 2.30%                 | 751          | 1.60%                | 51                 | 0.10%                     | 233                       | 0.50%                       | 31                          | 0.10%   | 0.10%                       |       |
| Dallas           | 40,663                             | 216                                     | 0.50%                 | 108          | 0.30%                | 94                 | 0.20%                     | 13                        | 0.00%                       | 3                           | 0.00%   | 0.00%                       |       |
| DeKalb           | 95,522                             | 4,260                                   | 6.50%                 | 4,193        | 6.40%                | 6                  | 0.00%                     | 4                         | 0.00%                       | 55                          | 0.10%   | 0.10%                       |       |
| Elmore           | 73,825                             | 1,210                                   | 1.60%                 | 897          | 1.20%                | 146                | 0.20%                     | 167                       | 0.20%                       | -                           | 0.00%   | 0.00%                       |       |

TITLE VI PROGRAM  
Limestone County Commission  
02/17/2015

|            |         |        |       |        |       |       |       |       |       |     |       |
|------------|---------|--------|-------|--------|-------|-------|-------|-------|-------|-----|-------|
| Escambia   | 35,700  | 178    | 0.50% | 131    | 0.40% | 34    | 0.10% | 13    | 0.00% | -   | 0.00% |
| Etowah     | 97,988  | 1,553  | 1.60% | 1,102  | 1.10% | 120   | 0.10% | 240   | 0.20% | 91  | 0.10% |
| Fayette    | 16,414  | 87     | 0.50% | 44     | 0.30% | 19    | 0.10% | 24    | 0.10% | -   | 0.00% |
| Franklin   | 29,352  | 2,336  | 8.00% | 2,314  | 7.90% | 22    | 0.10% | -     | 0.00% | -   | 0.00% |
| Geneva     | 25,078  | 395    | 1.60% | 369    | 1.50% | -     | 0.00% | 26    | 0.10% | -   | 0.00% |
| Greene     | 8,623   | 7      | 0.10% | 7      | 0.10% | -     | 0.00% | -     | 0.00% | -   | 0.00% |
| Hale       | 15,035  | 58     | 0.40% | 13     | 0.10% | 5     | 0.00% | 20    | 0.10% | 20  | 0.10% |
| Henry      | 16,304  | 244    | 1.50% | 81     | 0.50% | 104   | 0.60% | 59    | 0.40% | -   | 0.00% |
| Houston    | 93,681  | 1,304  | 1.40% | 890    | 1.00% | 129   | 0.10% | 250   | 0.30% | 35  | 0.00% |
| Jackson    | 50,342  | 469    | 0.90% | 430    | 0.90% | -     | 0.00% | 37    | 0.10% | 2   | 0.00% |
| Jefferson  | 613,744 | 16,987 | 2.80% | 13,300 | 2.20% | 1,040 | 0.20% | 2,079 | 0.30% | 568 | 0.10% |
| Lamar      | 13,776  | 38     | 0.30% | 35     | 0.30% | -     | 0.00% | 3     | 0.02% | -   | 0.00% |
| Lauderdale | 87,144  | 1,093  | 1.30% | 816    | 0.90% | 35    | 0.00% | 214   | 0.20% | 28  | 0.00% |
| Lawrence   | 32,127  | 140    | 0.40% | 137    | 0.40% | -     | 0.00% | 3     | 0.00% | -   | 0.00% |
| Lee        | 129,482 | 4,013  | 3.10% | 1,972  | 1.50% | 406   | 0.30% | 1,524 | 1.20% | 111 | 0.10% |
| Limestone  | 75,692  | 2,110  | 2.80% | 1,818  | 2.40% | 160   | 0.20% | 132   | 0.20% | -   | 0.00% |
| Lowndes    | 10,825  | 49     | 0.50% | 35     | 0.30% | 14    | 0.10% | -     | 0.00% | -   | 0.00% |
| Macon      | 20,379  | 121    | 0.60% | 105    | 0.50% | 13    | 0.10% | 3     | 0.00% | -   | 0.00% |
| Madison    | 308,736 | 8,169  | 2.60% | 4,984  | 1.60% | 1,013 | 0.30% | 2,049 | 0.70% | 123 | 0.00% |
| Marengo    | 19,821  | 40     | 0.20% | 25     | 0.10% | 15    | 0.10% | -     | 0.00% | -   | 0.00% |
| Marion     | 28,954  | 439    | 1.50% | 414    | 1.40% | 20    | 0.10% | 5     | 0.00% | -   | 0.00% |
| Marshall   | 85,278  | 6,413  | 7.50% | 5,892  | 6.90% | 107   | 0.10% | 241   | 0.30% | 173 | 0.20% |
| Mobile     | 382,340 | 8,167  | 2.10% | 3,811  | 0.10% | 999   | 0.30% | 2,908 | 0.80% | 449 | 0.10% |
| Monroe     | 21,752  | 181    | 0.80% | 153    | 0.70% | 7     | 0.00% | 21    | 0.10% | -   | 0.00% |
| Montgomery | 213,095 | 6,125  | 2.90% | 3,616  | 1.70% | 451   | 0.20% | 1,738 | 0.80% | 320 | 0.20% |
| Morgan     | 110,957 | 4,869  | 4.40% | 4,463  | 4.00% | 122   | 0.10% | 284   | 0.30% | -   | 0.00% |
| Perry      | 9,914   | 105    | 1.10% | 90     | 0.90% | 5     | 0.10% | 10    | 0.10% | -   | 0.00% |
| Pickens    | 18,564  | 212    | 1.10% | 201    | 1.10% | 11    | 0.10% | -     | 0.00% | -   | 0.00% |
| Pike       | 30,616  | 672    | 2.20% | 269    | 0.90% | 44    | 0.10% | 359   | 1.20% | -   | 0.00% |
| Randolph   | 21,500  | 436    | 2.00% | 403    | 1.90% | 33    | 0.20% | -     | 0.00% | -   | 0.00% |
| Russell    | 48,754  | 424    | 0.90% | 321    | 0.70% | 72    | 0.10% | 31    | 0.10% | -   | 0.00% |
| St. Clair  | 76,816  | 972    | 1.30% | 625    | 0.80% | 61    | 0.10% | 286   | 0.40% | -   | 0.00% |
| Shelby     | 178,619 | 6,441  | 3.60% | 5,044  | 2.80% | 462   | 0.30% | 892   | 0.50% | 43  | 0.00% |
| Sumter     | 12,946  | 49     | 0.40% | 8      | 0.10% | 32    | 0.20% | -     | 0.00% | 9   | 0.10% |
| Talladega  | 77,297  | 812    | 1.10% | 670    | 0.90% | 20    | 0.00% | 86    | 0.10% | 36  | 0.00% |
| Tallapoosa | 39,160  | 590    | 1.50% | 510    | 1.30% | 70    | 0.20% | 10    | 0.00% | -   | 0.00% |
| Tuscaloosa | 180,060 | 4,925  | 2.70% | 3,373  | 1.90% | 428   | 0.20% | 988   | 0.50% | 136 | 0.10% |
| Walker     | 63,292  | 550    | 0.90% | 489    | 0.80% | 16    | 0.00% | 45    | 0.10% | -   | 0.00% |
| Washington | 16,522  | 58     | 0.40% | 57     | 0.30% | -     | 0.00% | 1     | 0.00% | -   | 0.00% |
| Wilcox     | 11,158  | -      | 0.00% | -      | 0.00% | -     | 0.00% | -     | 0.00% | -   | 0.00% |
| Winston    | 23,323  | 122    | 0.50% | 94     | 0.40% | 24    | 0.10% | -     | 0.00% | 4   | 0.00% |

## LIMITED ENGLISH PROFICIENCY (LEP) INTERACTIONS STAFF SURVEY

Individuals with Limited English Proficiency do not speak English as their primary language, have a limited ability to read, speak, write, or understand English or are native English speakers with low levels of literacy.

1) In the past six months have you encountered a Limited English Proficiency (LEP) person in your work activities?

2) What language have you encountered in the past six months?

3) How many times have you encountered a LEP person speaking (language selected in Question 2) in the past six months?

4) What type of work activity were you involved in when you encountered this language?

Choose all that apply

- ◆ Outreach/Public Meeting
- ◆ E-mail
- ◆ Phone Call
- ◆ Other, please specify

5) Have you encountered additional languages in the past six months?

# LIMITED ENGLISH PROFICIENCY (LEP) PLAN

310 West Washington Street  
Athens, AL 35611  
256-233-6400  
[www.limestonecounty-al.gov](http://www.limestonecounty-al.gov)

## **Introduction**

This Limited English Proficiency Plan (LEP) has been prepared to address the Limestone County Commission'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 Limestone County Commission 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 Limestone County Commission. 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 Limestone County Commission 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 Limestone County Commission 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 Limestone County Commission program, activity, or service.
2. The frequency with which LEP persons come into contact with the Limestone County Commission's programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the Limestone County Commission to the LEP population.
4. The resources available to the Limestone County Commission 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 Limestone County Commission program, activity, or service.***

The Limestone County Commission reviewed the 2010 U.S. Census Report and determined that the total population for Limestone County is 75,692. 2110 (2.80%) residents report speaking English less than very well. Those persons with limited English proficiency are in the following groups: 1,818 speak Spanish Creole, 160 speak Indo European languages, and 132 speak Asian-Pacific Island. The most popular language spoken at home other than English is Spanish. The Limestone County Commission will likely encounter more Spanish speaking persons that benefit from the transit programs than any other LEP persons.

**2. *The frequency with which LEP persons come into contact with the Limestone County Commission's programs, activities, or services.***

The Limestone County Commission 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   |
| Dispatchers      | Minimum   |
| Reservationist   | Minimum   |
| Receptionist     | Minimum   |

**3. *The nature and importance of programs, activities, or services provided by the Limestone County Commission to the LEP population.***

The Limestone County Commission provides transportation to kidney dialysis patients. There is one van transporting three times weekly to two dialysis facilities. This service is very important to the community, because there are residents who depend on it as their only means of transportation to dialysis.

The largest geographic concentration of LEP individuals in the Limestone County Commission's service area are Spanish speaking residents. These residents may be dependent upon our specialized transportation services.

**4. *The resources available to the Limestone County Commission and the overall cost to provide LEP assistance.***

The Limestone County Commission assessed its resources and determined that funds are available within the current budget for providing LEP assistance. The Limestone County Commission also determined which documents would be most beneficial if translated into other languages and the cost associated with this effort. An inventory of available organizations with which the Limestone County Commission 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 Limestone County Commission'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 Limestone County Commission 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 Limestone County Commission 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 Limestone County Commission 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 Limestone County Commission's programs and services through these organizations.
- Posting the Limestone County Commission'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.

- Providing a bilingual Community Outreach Coordinator at community events and public hearings when needed.
- 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 when needed.
- Providing Language Identification Flash Cards onboard the Limestone County Commission's Kidney van, in Dialysis facilities, and at the Administrative Office.
- Providing language translation for LEP persons when needed.

### **3. Training Staff**

The Limestone County Commission will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Developing a curriculum and corresponding PowerPoint to educate staff on the Title VI requirements for providing meaningful access to services for LEP persons.
- Providing staff with a description of language assistance services offered by the Limestone County Commission.
- 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 Limestone County Commission will provide notice to LEP persons in both oral and written communications by:

- Offering general information, such as operation hours on the Limestone County Commission's Kidney van in other languages when needed.
- Providing the following written communications in both English and other languages when needed:
  - Onboard fliers containing information about route changes, rider alerts, and public hearings;
  - Interior bus signage that displays safety or system policy information;

- 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 Limestone County Commission 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 Limestone County Commission's service area, and/or during the process of updating Title VI Program.

The Limestone County Commission 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 Limestone County Commission's financial resources are sufficient to fund the needed language assistance efforts.
- Determining whether the Limestone County Commission has fully complied with the goals of the LEP Plan.
- Determining whether complaints have been received concerning the Limestone County Commission's failure to meet the needs of LEP individuals.

### **Dissemination of the Limestone County Commission'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 Limestone County Commission'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 Limestone County Commission 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 Limestone County Commission at the following address:

Sonya Anthony  
310 West Washington Street  
Athens, AL 35611  
256-233-6400  
[www.limestonecounty-al.gov](http://www.limestonecounty-al.gov)

## Appendix E

Table Depicting Minority Representation on Planning and Advisory Bodies

| Entity  | Board of Commissioners | County Board of Health | County Board of Education | County Board of Mental Health | County Board of Economic Development |
|---|------------------------|------------------------|---------------------------|-------------------------------|--------------------------------------|
| City of Limestone                               |                        |                        |                           |                               |                                      |
| City of Wetumpka                                |                        |                        |                           |                               |                                      |
| City of Wetumpka Neighborhood Council           |                        |                        |                           |                               |                                      |
| City of Wetumpka Planning and Zoning Commission |                        |                        |                           |                               |                                      |
| City of Wetumpka Planning Board                 |                        |                        |                           |                               |                                      |

# 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.

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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.

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

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

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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.

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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.

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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.

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

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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.

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## 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.

No applications are pending.

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.)

Community Development Block Grant – ADECA  
ADECA performed the review, and found no issues.

Recreational Trails Program – ADECA  
No issues found.

3. Is your agency considered a minority organization:  Yes  No

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

|  |   |
|--|---|
| <input type="checkbox"/> Black American    | <input type="checkbox"/> Sub-Continent Asian-American |
| <input type="checkbox"/> Hispanic American | <input type="checkbox"/> Asian-Pacific American       |
| <input type="checkbox"/> Native American   | <input type="checkbox"/> Other                        |

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

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

|   |  |
|---|--|
| <input checked="" type="checkbox"/> Black American    | <input checked="" type="checkbox"/> Sub-Continent Asian-American |
| <input checked="" type="checkbox"/> Hispanic American | <input checked="" type="checkbox"/> Asian-Pacific American       |
| <input checked="" type="checkbox"/> Native American   | <input type="checkbox"/> Other                                   |



## Appendix H

### Documentation of Title VI Authorization

#### RESOLUTION ADOPTING A TITLE VI PLAN

**WHEREAS**, the Limestone County Commission is a recipient of federal financial assistance from the Alabama Department of Transportation in support of transit services which imposes certain obligations upon the recipient, including complying with the Title VI federal requirements; 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

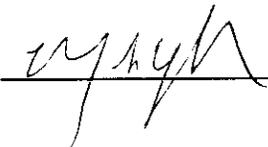
**WHEREAS**, the Limestone County Commission commits to assure that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the 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 Commissioners of the Limestone County Commission as follows:

The Limestone County Commission approves the proposed Title VI Program in order to comply with the Title VI federal requirements.

The Grant Coordinator, in his/her capacity, will serve as the Title VI Officer and is authorized to revise and update the plan as necessary.

Adopted this 17<sup>th</sup> day of February, 2015.

Signature: 

Typed Name: Mark Yarbrough

Title: Chairman,  
Limestone County Commission

Attest: 

Typed Name: Pam Ball

Title: County Administrator,  
Limestone County Commission