

Marshall County Council on Aging

Title VI Program

April 25, 2018

Revised

08/10/2022

**436 Blount Avenue
Guntersville, Alabama 35976**

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www.marshallco.org**

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I. Policy Statement

The Marshall County Council on Aging 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 Marshall County Council on Aging in its administration and management of Title VI. The Marshall County Council on Aging’s Title VI Coordinator is the Transportation Coordinator. She can be contacted at 256-571-7805.

II. Notice to the Public

The Marshall County Council on Aging has developed a Title VI Notice to provide information to the public regarding the Marshall County Council on Aging 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 Marshall County Council on Aging as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The Marshall County Council on Aging has posted the Title VI Notice on the agency’s website and in public areas of the agency’s office including the receptionist area. The notice is also posted in all transit vehicles. 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 Marshall County Council on Aging adopted Title VI complaint procedures to investigate and track 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 Marshall County Council on Aging’s website. If information is needed in another language, the complainant can contact (256)571-7805. The statement “if information is needed in another language” will be posted with the complaint procedures in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

. Completed forms should be submitted to:

**Transportation Coordinator
Marshall County Council on Aging
436 Blount Avenue
Guntersville, Alabama 35976
256-571-7805
Sandra.bishop@marshallco.org**

Once the complaint is received, the Marshall County Council on Aging 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 Marshall County Council on Aging's office. The Marshall County Council on Aging will only process complaint forms that are complete and signed.

In a situation where the complainant is unable or incapable of providing a written complaint, a verbal complaint may be made to the Marshall County Council on Aging. Under these circumstances, the complainant will be interviewed and the Marshall County Council on Aging will assist the complainant in converting the verbal allegations to a written complaint.

The Marshall County Council on Aging has 15 business days to investigate the complaint. If more information is needed to resolve the case, the Marshall County Council on Aging may contact the complainant. The complainant has 15 days from the date of this letter to send requested information to the investigator assigned to the case. If the investigator does not receive the additional information within 15 days, the Marshall County Council on Aging 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 the 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. A 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 the Marshall County Council on Aging.

If the complainant is not satisfied with actions taken locally or if they demand further action, the complaint will be referred to:

Local Transportation Bureau, Transit Section
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, AL 36110

A person may also file a complaint directly with the Federal Transit Administration:

FTA Office of Civil Rights
Attn: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue SE
Washington, DC 20590.

IV. Transit-Related Investigations, Complaints, and Lawsuits

The Marshall County Council on Aging 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.

Since the submission of the last Title VI Program to ALDOT, there have been no Title VI transit-related investigations, complaints, or lawsuits received by the Marshall County Council on Aging. 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 Marshall County Council on Aging commits to provide 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 Marshall County Council on Aging's Public Participation Plan is ongoing and reviewed regularly in order to identify, meet, and serve the community's needs.

In an effort integrate the opinions of minority, low-income, and LEP populations into community outreach activities, the Marshall County Council on Aging's Public Participation Plan will:

- Continue to coordinate with community-based organizations to identify and 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 transit websites, in the receptionist areas, 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.
- Host a table or booth at community events or piggyback engagement efforts onto regularly-scheduled community meetings.
- Utilize interactive and collaborative online technologies, such as social networking, blogs, video sharing, and wikis.
- Develop signs, fliers, or other materials to mail or distribute to the general public and to post in libraries, community centers, etc.
- Consider non-traditional media outlets such as local neighborhood publications or internet outlets such as YouTube, Twitter, or Facebook.

To date, the Marshall County Council on Aging has participated in the following public outreach and involvement activities:

- Marshall County Council on Aging staff members have participated in and supported Community-Based Transportation Programs for disadvantaged communities.
- Marshall County Council on Aging staff members have attended local meetings to identify community needs and to participate as a stakeholder agency.
- Marshall County Council on Aging staff members have participated in public outreach efforts to explain specific transit proposals and to solicit comments.
- Public notices have been posted on the transit website, in the receptionist area, and on buses.

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 Marshall County Council on Aging considers the needs of LEP persons. This assessment balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Marshall County Council on Aging's program, in addition to the number or proportion of LEP persons served, the analysis identified:
 - A. How LEP persons interact with the Marshall County Council on Aging;
 - B. 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;
 - C. The literacy skills of LEP populations in their native languages to determine whether document translation will be an effective practice and
 - D. Whether or not LEP persons are underserved by the Marshall County Council on Aging due to language barriers.
2. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:
 - Bus drivers; Receptionist; and Dispatcher
3. The nature and importance of the Marshall County Council on Aging's program to people's lives.
4. The resources available for LEP outreach and the costs associated with that outreach.

The Marshall County Council on Aging 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 Marshall County Council on Aging 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 Marshall County Council on Aging has identified the following 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: Spanish. This language group is also listed in Appendix D along with a copy of the current census data for the Marshall County Council on Aging's service area.

The Marshall County Council on Aging 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 Marshall County Council on Aging also provides free translation services upon request.

VII. Minority Representation on Planning and Advisory Bodies

The Marshall County Council on Aging 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 Marshall County Council on Aging does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by the Marshall County Council on Aging. If the Marshall County Council on Aging 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. The copy of the table that will be used is included in Appendix E. Additionally, 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 Marshall County Council on Aging has no construction projects scheduled. In the event that the Marshall County Council on Aging decides to acquire land and/or construct facilities, the Marshall County Council on Aging 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 Marshall County Council on Aging shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

The Marshall County Council on Aging 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 Marshall County Council on Aging will engage in outreach to persons potentially impacted by the placement of facilities. A 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 Marshall County Council on Aging's Board of Directors approved the Title VI program on 08/10/2022. 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

Marshall County Council on Aging 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 Marshall County Council on Aging.

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

**Marshall County Council on Aging
436 Blount Avenue
Guntersville, AL 35976
256-571-7805
www.marshallco.org**

A complaint may be filed directly with the Federal Transit Administration by contacting:

**Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590**

FTACivilRightsCommunications@dot.gov

If information is needed in another language, then contact

256-571-7805

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):		
<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.		

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?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <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:		
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:

Marshall County Council on Aging
 436 Blount Avenue
 Guntersville, AL 35976

Title VI Notice to the Public in Spanish

TÍTULO VI AVISO DE PROTECCIÓN CONTRA LA DISCRIMINACIÓN

Marshall County Council on Aging opera sus programas sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier acto ilícito práctica discriminatoria bajo el Título VI puede presentar una queja ante la Marhsall County Council on Aging.

Para obtener más información sobre el programa de derechos civiles y los procedimientos para presentar una queja, comuníquese con:

**Marshall County Council on Aging
436 Blount Avenue
Guntersville, AL 35976
(256)571-7805
www.marshallco.org**

Se puede presentar una denuncia directamente ante el Administración Federal de Tránsito poniéndose en contacto con:

**Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
FTACivilRightsCommunications@dot.gov**

**Title VI Complaint form in Spanish
 Formulario de queja del Título VI**

Sección I	
Nombre:	
Dirección:	
Teléfono (Casa o móvil):	Teléfono (Oficina):
Correo Electronico:	
Sección II	
¿Está presentando esta queja en su propio nombre? <input type="checkbox"/> Si <input type="checkbox"/> No	
Si respondió "Sí" a esta pregunta, pase a la Sección III.	
De lo contrario, proporcione el nombre y la relación de la persona por la que está presentando una queja:	
Explique por qué esta lleandolo a un tercero:	
Confirme que obtuvo el permiso de la parte agraviada si presenta la presentación en su nombre. <input type="checkbox"/> Sí <input type="checkbox"/> No	
Sección III	
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional	
Fecha de la supuesta discriminación (MM/DD/YYYY): _____	
Explique lo más claramente posible lo que sucedió y por qué cree que fue objeto de discriminación. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si se conocen), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.	

Sección IV	
¿Ha presentado previamente una queja del Título VI con esta agencia?	<input type="checkbox"/> Sí <input type="checkbox"/> No
Sección V	
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?	<input type="checkbox"/> Sí <input type="checkbox"/> No
En caso afirmativo, marque y especifique todo lo que corresponda:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> State Court: _____	<input type="checkbox"/> Local Agency: _____
Proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Correo Electronico:	
Sección VI	
Nombre de la agencia en la que se presenta la queja:	
Persona de contacto:	
Título:	
Teléfono:	
Correo Electronico:	

Adjunte cualquier material escrito u otra información que considere relevante para su queja.

Firma y fecha requeridas a continuación:

 Firma

 Fecha

Por favor entregue este formulario en persona, o envíelo por correo o por correo electrónico utilizando la información de contacto a continuación:

Marshall County Council on Aging
 436 Blount Avenue
 Guntersville, AL 35976

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.				

State of Alabama and All Counties within Alabama
 Language Spoken at Home

Based on Census 2020 Data and 2015-2020 American Community Survey

Area Name	Population 5 Years and Over	# Population Speak English Less Than Very Well	% Population Speak English Less Than Very Well	# Speak Spanish and Speak English Less Than Very Well	# Speak Other Indo-European Languages and Speak English Less Than Very Well	# Speak Asian and Pacific Island Languages and Speak English Less Than Very Well	# Speak Other Languages and Speak English Less Than Very Well
Alabama	4,599,254	96,598	2.1%	65,217	8,460	19,539	3,382
County							
Autauga	52,404	668	1.3%	273	57	203	135
Baldwin	206,329	3,733	1.8%	2,595	562	576	0
Barbour	23,694	667	2.8%	482	56	39	90
Bibb	21,121	306	1.4%	306	0	0	0
Blount	54,250	1,799	3.3%	1,756	15	14	14
Bullock	9,579	242	2.5%	228	14	0	0
Butler	18,565	141	0.8%	48	34	59	0
Calhoun	107,662	1,473	1.4%	1,099	45	329	0
Chambers	31,443	410	1.3%	190	51	159	10
Cherokee	24,907	392	1.6%	369	12	11	0
Chilton	41,400	1,444	3.5%	1,335	65	44	0
Choctaw	12,084	41	0.3%	25	16	0	0
Clarke	22,516	66	0.3%	23	6	37	0
Clay	12,563	12	0.1%	12	0	0	0
Cleburne	14,064	145	1.0%	145	0	0	0
Coffee	49,013	1,285	2.6%	834	4	440	7
Colbert	51,868	573	1.1%	366	128	79	0
Conecuh	11,765	0	0.0%	0	0	0	0
Coosa	10,232	54	0.5%	54	0	0	0
Covington	34,957	112	0.3%	47	15	50	0
Crenshaw	13,090	161	1.2%	41	5	115	0
Cullman	78,182	1,111	1.4%	1,000	8	103	0
Dale	46,033	1,013	2.2%	682	122	209	0
Dallas	35,798	106	0.3%	3	10	93	0
DeKalb	67,152	3,538	5.3%	3,538	0	0	0
Elmore	76,825	1,238	1.6%	914	222	95	7
Escambia	34,645	283	0.8%	169	15	90	9
Etowah	96,739	1,879	1.9%	1,352	293	173	61
Fayette	15,484	34	0.2%	11	22	1	0
Franklin	29,292	2,745	9.4%	2,454	0	206	85

TITLE VI PROGRAM
 Marshall County Council on Aging
 04/25/2018
 Revised 08/10/2022

Area Name	Population 5 Years and Over	# Population Speak English Less Than Very Well	% Population Speak English Less Than Very Well	# Speak Spanish and Speak English Less Than Very Well	# Speak Other Indo-European Languages and Speak English Less Than Very Well	# Speak Asian and Pacific Island Languages and Speak English Less Than Very Well	# Speak Other Languages and Speak English Less Than Very Well
Geneva	24,935	165	0.7%	128	0	37	0
Greene	7,725	46	0.6%	46	0	0	0
Hale	13,768	60	0.4%	52	0	8	0
Henry	16,258	122	0.8%	97	25	0	0
Houston	98,813	957	1.0%	544	145	251	17
Jackson	49,112	424	0.9%	321	11	92	0
Jefferson	616,321	14,530	2.4%	10,582	1,399	2,014	535
Lamar	13,058	19	0.1%	15	0	4	0
Lauderdale	88,122	1,296	1.5%	929	77	239	51
Lawrence	31,194	348	1.1%	336	0	7	5
Lee	153,960	4,450	2.9%	1,061	339	2,949	101
Limestone	91,525	1,946	2.1%	1,351	347	213	35
Lowndes	9,329	3	0.0%	3	0	0	0
Macon	17,557	19	0.1%	17	2	0	0
Madison	346,126	8,826	2.5%	5,408	942	2,345	131
Marengo	17,897	91	0.5%	17	66	0	8
Marion	28,291	350	1.2%	175	25	54	96
Marshall	89,412	6,456	7.2%	5,637	601	147	71
Mobile	386,795	5,764	1.5%	2,367	574	2,336	487
Monroe	19,936	37	0.2%	8	9	20	0
Montgomery	211,104	5,681	2.7%	2,479	560	2,285	357
Morgan	112,101	4,023	3.6%	3,573	66	138	246
Perry	8,602	0	0.0%	0	0	0	0
Pickens	19,011	570	3.0%	554	8	8	0
Pike	31,489	922	2.9%	146	202	574	0
Randolph	21,418	177	0.8%	113	64	0	0
Russell	53,882	824	1.5%	625	42	157	0
St. Clair	83,709	873	1.0%	757	0	116	0
Shelby	203,949	5,288	2.6%	3,244	483	1,122	439
Sumter	11,875	303	2.6%	140	140	105	58
Talladega	75,955	1,022	1.3%	693	143	80	106
Tallahassee	38,254	366	1.0%	337	15	14	0
Tuscaloosa	196,347	3,918	2.0%	2,258	536	956	168
Walker	59,904	662	1.1%	543	0	119	0
Washington	15,518	36	0.2%	22	0	14	0
Wilcox	9,873	77	0.8%	24	0	0	53
Winston	22,473	276	1.2%	264	2	10	0

Marshall County Council on Aging					
	Marshall	Total		5% of Total Pop.	
Population 5 Years & Over	89412	89412		4471	Use 1000
# Speak English Less Than Very Well	6456	6456			
% Speak English Less Than Very Well	7.2	7.2			
# Speak Spanish & Speak English Less Than Very Well	5637	5637			
# Speak Indo-European Languages & Speak English Less Than Very Well	601	601			
# Speak Asian & Pacific Island Languages & Speak English Less Than Very Well	147	147			
# Speak Other Languages & Speak English Less Than Very Well	71	71			

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Marshall County Council on Aging
436 Blount Avenue
Guntersville, AL 35976
(256)571-7805
Sandra.bishop@marshallco.org
www.marshallco.org

Introduction

This Limited English Proficiency Plan (LEP) has been prepared to address the Marshall County Council on Aging's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. 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 Marshall County Council on Aging 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 Marshall County Council on Aging. 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 Marshall County Council on Aging 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 Marshall County Council on Aging 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 Marshall County Council on Aging program, activity, or service.
2. The frequency with which LEP persons come into contact with the Marshall County Council on Aging's programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the Marshall County Council on Aging to the LEP population.
4. The resources available to the Marshall County Council on Aging 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 Marshall County Council on Aging program, activity, or service.***

The Marshall County Council on Aging reviewed the 2020 U.S. Census Report and determined that the population for Marshall County is 89,412 and 6,456 persons (7.2%) residents report speaking English less than very well. Those with limited English proficiency are in the following groups: 5637 speak Spanish, 601 speak Indo-European languages, 147 speak Asian/Pacific Island languages and 71 speak other languages. The most popular language spoken at home other than English is Spanish. The Marshall County Council on Aging will likely encounter more persons who speak Spanish that benefit from the transit programs than any other LEP persons.

2. *The frequency with which LEP persons come into contact with the Marshall County Council on Aging’s programs, activities, or services.*

The Marshall County Council on Aging 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	Moderate
Dispatchers	Minimum
Receptionist	Moderate

3. *The nature and importance of programs, activities, or services provided by the Marshall County Council on Aging to the LEP population.*

Transit vehicles provides transportation to and from Senior Centers and short trips. Keeping seniors active means a longer life and they remain healthy. Hot meals are important to them. Being with peers is important to keeping their mind sharp. All activities are all about them, short trips, speakers and many fun activities each day.

The largest geographic concentration of LEP individuals in the Marshall County Council on Aging’s service area communicates by speaking Spanish. These individuals are often dependent upon our specialized transportation services. It is also likely that the Marshall County Council on Aging will encounter LEP individuals where tickets are sold and at community outreach events.

4. The resources available to the Marshall County Council on Aging and the overall cost to provide LEP assistance.

The Marshall County Council on Aging assessed its resources and determined that funds are available within the current budget for providing LEP assistance. The Marshall County Council on Aging 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 Marshall County Council on Aging 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

Five action items comprise the Marshall County Council on Aging'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 Marshall County Council on Aging 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 Marshall County Council on Aging sponsored events. By engaging participants in conversation, staff may informally gauge each attendee's ability to speak and understand English.

2. Providing Language Assistance

The Marshall County Council on Aging 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 Marshall County Council on Aging's programs and services through these organizations.
- Implementing a Hispanic Education and Outreach program.
- Posting the Marshall County Council on Aging's Title VI Notice, Complaint Procedures, Complaint Form, and LEP Plan on the agency's website.
- Providing travel training to LEP persons.
- Identifying in-house staff with other language abilities to assist with translation services.

- Making public notices, publications, and other printed materials (including webpage content) available in other languages.
- Providing a bilingual Community Outreach Coordinator at community events and public hearings.
- 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 Marshall County Council on Aging's fleet, in Field Supervisor vehicles, and at the Administrative Office.
- Providing language translation for LEP persons in Route Guides.
- Utilizing a web-based translation service application such as Google Translate.
- Utilizing telephone translation services.

3. Train Staff

The Marshall County Council on Aging 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 Marshall County Council on Aging.
- 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 Marshall County Council on Aging will provide notice to LEP persons in both oral and written communications as needed by:

- Offering general information, such as operation hours, etc., on the Marshall County Council on Aging's customer service line in multiple languages.

- Implementing the use of an automated greeting in both Spanish and English, directing callers to select which language they prefer.

- Providing the following written communications in both English and Spanish as 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 Marshall County Council on Aging 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 Marshall County Council on Aging's service area, and/or during the process of updating Title VI Program.

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

Dissemination of the Marshall County Council on Aging'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 Marshall County Council on Aging'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, e-mail, mail, or in person. LEP individuals may request that these plans be translated into various languages. If feasible, the Marshall County Council on Aging 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 Marshall County Council on Aging at the following address:

**Marshall County Council on Aging
436 Blount Avenue
Guntersville, AL 35976
Sandra.bishop@marshallco.org
(256)571-7805
www.marshallco.org**

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. None
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 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 type="checkbox"/> Sub-Continent Asian-American |
| <input checked="" type="checkbox"/> Hispanic American | <input type="checkbox"/> Asian-Pacific American |
| <input type="checkbox"/> Native American | <input type="checkbox"/> 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.
Sandra Bishop
256-571-7805

6. Did your organization's projects and/or services that have Title VI, Limited English Proficiency, or Environmental Justice impacts change?
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

Documentation of Title VI Authorization

RESOLUTION ADOPTING A TITLE VI PLAN

WHEREAS, the Marshall County Council on Aging 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 Marshall County Council on Aging 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;

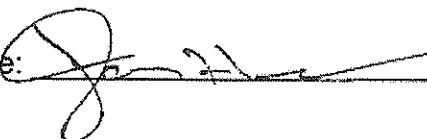
NOW, THEREFORE, be it resolved by the Marshall County Commission as follows:


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

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

The plan was revised because new census data was released, not because of ALDOT changes.

Adopted this 10th day of August, 2022.

Signature: 

Attest: 

Typed Name: James Hutcheson

Typed Name: Ashleigh Bubbet

Title: Chairman

Title: County Administrator