

City of Satsuma

TITLE VI PROGRAM

SEPTEMBER 15, 2015

P.O. Box 517
Satsuma, AL 36572
251-675-1440
www.cityofsatsuma.com

TABLE OF CONTENTS

	<u>Page</u>
I. Policy Statement	1
II. Notice to the Public	1
III. Complaint Procedures and Form	1
IV. Transit-Related Investigations, Complaints, and Lawsuits	2
V. Public Participation Plan	3
VI. Limited English Proficient Plan	4
VII. Minority Representation on Planning and Advisory Bodies	5
VIII. Guidance on Determining Site or Location of Facilities	5
IX. Additional Title VI Information	6
X. Board Meeting Resolution of Approved Title VI Program	6

APPENDICES

Appendix A – Title VI Notice to the Public	7
Appendix B – Title VI Complaint Form	8
Appendix C – List of Transit-Related Investigations, Complaints, and Lawsuits,	10
Appendix D – Limited English Proficiency Plan	11
Appendix E – Table Depicting Minority Representation on Planning and Advisory Bodies	20
Appendix F – Title VI Construction Project Analysis	21
Appendix G – Additional Title VI Information	24
Appendix H – Documentation of Title VI Authorization	26

I. Policy Statement

The City of Satsuma 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 City of Satsuma in its administration and management of Title VI related activities. The City of Satsuma’s Title VI Coordinator is Vicki Miller, City Clerk. She can be contacted at 251-675-1440 and/or vmiiller@cityofsatsuma.com.

II. Notice to the Public

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

The City of Satsuma has posted the Title VI Notice on the agency’s website and in public areas of the agency’s office 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 City of Satsuma 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 City of Satsuma’s website*. Completed forms should be submitted to:

Vicki Miller
City Clerk
City of Satsuma
P.O. Box 517
Satsuma, Alabama 36572

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

The City of Satsuma has 15 business days to investigate the complaint. If more information is needed to resolve the case, the City of Satsuma 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 City of Satsuma 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. 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 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 251-675-1440.

IV. Transit-Related Investigations, Complaints, and Lawsuits

The City of Satsuma 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 City of Satsuma. 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 City of Satsuma 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 City of Satsuma'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 City of Satsuma's public participation program will:

- Continue to coordinate with community-based organizations to identify and implement strategies to reach out to members in the affected minority, low-income, and LEP communities.
- Reduce barriers to public participation from these segments of the population.
- Place public notices on city website, in the receptionist areas and on transit vehicles.
- Utilize the media (newspaper, radio, television, etc.) to notify the minority, low-income, and LEP populations of public involvement efforts.
- 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 materials in English and other languages as needed.
- Make public information available in electronically accessible formats.
- Develop signs, fliers, or other materials to mail or distribute to the general public and to post in libraries, community centers, etc.

To date, the City of Satsuma has participated in the following public outreach and involvement activities:

- City of Satsuma staff members have attended local meetings to identify community needs and to participate as a stakeholder agency.
- Public notices and information have been posted on the city website, in the receptionist area and on the 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 City of Satsuma 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 City of Satsuma's program. In addition to the number or proportion of LEP persons served, the analysis identified:
 1. How LEP persons interact with the City of Satsuma;
 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 City of Satsuma due to language barriers.
- B. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:
 1. Bus users;
 2. Public Meeting Participation;
 3. Receptionist;
 4. Staff Survey; and
 5. Bus Driver
- C. The nature and importance of the City of Satsuma's program to people's lives.
- D. The resources available for LEP outreach and the costs associated with that outreach.

The City of Satsuma 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 City of Satsuma 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

The City of Satsuma does not have any language groups within the service area that exceed the Safe Harbor Threshold of 1000 persons or 5%, whichever is less, of the total population.

VII. Minority Representation on Planning and Advisory Bodies

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

The City of Satsuma 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 City of Satsuma 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 Satsuma City Council approved the Title VI program on September 15, 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

City of Satsuma 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 City of Satsuma.

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

**City of Satsuma
P.O. Box 517, Satsuma, AL 36572
251-675-1440
www.cityofsatsuma.com**

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

**Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington DC 20590**

**If information is needed in another language, then contact
251-675-1440.**

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:

Vicki Miller
 City of Satsuma
 P.O. Box 517
 Satsuma, AL 36572

Appendix C

List of Transit-Related Investigations, Complaints, and Lawsuits

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

Appendix D

Demographics

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 6 Years and Older	# Population			% Population			# Speak			% Speak			# Speak			% Speak		
		Speak English Less Than Very Well																	
State of Alabama	4,443,763	105,317	2.40%	78,394	1.80%	7,446	0.20%	17,119	0.40%	2,358	0.10%	17	0.00%	53	0.00%	17	0.00%		
County																			
Autauga	50,376	543	1.10%	333	0.70%	49	0.10%	144	0.30%	17	0.00%	17	0.00%	53	0.00%	17	0.00%		
Baldwin	168,414	4,100	2.40%	2,963	1.80%	445	0.30%	639	0.40%	53	0.00%	53	0.00%	-	0.00%	-	0.00%		
Barbour	25,877	519	0.20%	397	1.50%	26	0.10%	96	0.40%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Bibb	21,439	172	0.80%	123	0.60%	-	0.00%	49	0.20%	-	0.00%	-	0.00%	-	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%	-	0.00%	-	0.00%		
Bullock	10,206	321	3.10%	321	3.10%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Butler	19,512	111	0.60%	51	0.30%	19	0.10%	41	0.20%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Calhoun	110,409	1,902	1.70%	1,516	1.40%	162	0.10%	200	0.20%	24	0.00%	24	0.00%	-	0.00%	-	0.00%		
Chambers	32,366	209	0.60%	138	0.40%	22	0.10%	49	0.20%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Cherokee	24,515	67	0.30%	26	0.1%	-	0.00%	23	0.10%	18	0.10%	18	0.10%	-	0.00%	-	0.00%		
Chilton	40,445	1,436	3.60%	1,358	3.40%	16	0.00%	56	0.10%	6	0.00%	6	0.00%	-	0.00%	-	0.00%		
Choctaw	13,178	10	0.10%	10	0.00	-	0.00%	-	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%	-	0.00%	-	0.00%		
Clay	13,211	255	1.90%	244	1.80%	11	0.10%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Cleburne	13,942	159	1.10%	159	1.10%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Coffee	45,929	1,403	3.10%	1,051	2.30%	59	0.10%	293	0.60%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Colbert	51,382	640	1.20%	561	1.10%	24	0.00%	55	0.10%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Conecuh	12,488	51	0.40%	51	0.40%	-	0.00%	-	0.00%	-	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%	-	0.00%	-	0.00%		
Covington	35,464	418	1.20%	279	0.80%	20	0.10%	119	0.30%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Crenshaw	13,085	214	1.60%	108	0.80%	-	0.00%	106	0.80%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		
Cullman	75,324	1,721	2.30%	1,441	1.90%	84	0.10%	193	0.30%	3	0.00%	3	0.00%	-	0.00%	-	0.00%		
Dale	46,237	1,066	2.30%	751	1.60%	51	0.10%	233	0.50%	31	0.10%	31	0.10%	-	0.00%	-	0.00%		
Dallas	40,663	218	0.50%	108	0.30%	94	0.20%	13	0.00%	3	0.00%	3	0.00%	-	0.00%	-	0.00%		
DeKalb	65,522	4,260	6.50%	4,193	6.40%	8	0.00%	4	0.00%	55	0.10%	55	0.10%	-	0.00%	-	0.00%		
Elmore	73,825	1,210	1.60%	897	1.20%	146	0.20%	167	0.20%	-	0.00%	-	0.00%	-	0.00%	-	0.00%		

TITLE VI PROGRAM
CITY OF SATSUMA
September 15, 2015

Escambia	35,700	178	0.50%	131	0.40%	34	0.10%	13	0.00%	-	0.00%
Etowah	97,968	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%
Tallahassee	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

CITY OF SATSUMA

P.O. Box 517
Satsuma, AL 36572
251-675-1440
www.cityofsatsuma.com

Introduction

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

The City of Satsuma reviewed the 2010 U.S. Census Report and determined that the total population for the Mobile County is 382,340 and 8167 (2.10%) residents

report speaking English less than very well. Those persons with limited English proficiency are in the following groups: 3811 speak Spanish/Creole, 999 speak Indo-European languages, 2908 speak Asian/Pacific Island language, and 449 speak other languages. The most popular language spoken at home other than English is Spanish. The City of Satsuma 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 City of Satsuma’s programs, activities, or services.

The City of Satsuma 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 User	Minimum
Public Meeting Participation	Minimum
Receptionist	Minimum
Bus Driver	Minimum
Staff Survey	Minimum

3. The nature and importance of programs, activities, or services provided by the City of Satsuma to the LEP population.

The City of Satsuma utilizes the buses to provide necessary transportation to the elderly community living within the City of Satsuma and its corresponding police jurisdiction. The objective of the Senior Program is to enable seniors to remain independent in their own homes by providing transportation. Rides are provided to medical appointments, group meal locations, shopping and grocery store and other locations as necessary.

The largest geographic concentration of LEP individuals in the City of Satsuma’s service area are Spanish speaking residents. These residents could be dependent upon our specialized transportation services

4. The resources available to the City of Satsuma and the overall cost to provide LEP assistance.

The City of Satsuma assessed its resources and determined that funds could be made available within the current budget for providing LEP assistance if needed. The City of Satsuma also determined which documents would be most beneficial if translated into other languages. An inventory of available organizations with which the City of Satsuma 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 City of Satsuma'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 City of Satsuma identifies an LEP person who requires language assistance by:

- Interviewing receptionist 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 board the bus. 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 City of Satsuma assists an LEP person who requires language assistance by:

- Networking with local community organizations that provide service to LEP individuals and seeking opportunities to provide information on the City of Satsuma's programs and services through these organizations.
- Posting the City of Satsuma's Title VI Notice, Complaint Procedures, and Complaint Form on the agency's website.
- 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 as needed.
- Providing Language Identification Flash Cards onboard the City of Satsuma's fleet, in Field Supervisor vehicles, and at the Administrative Office.

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

3. Training Staff

The City of Satsuma will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Providing staff with a description of language assistance services offered by the City of Satsuma.
- 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 City of Satsuma will provide notice to LEP persons in both oral and written communications by:

- Providing the following written communications in both English and other languages as needed:
 - Interior bus signage that displays safety or system policy information and
 - 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 City of Satsuma 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 City of Satsuma's service area, and/or during the process of updating Title VI Program.

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

Dissemination of the City of Satsuma's LEP Plan

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

- Any person or agency may 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 City of Satsuma will accommodate such requests.

Questions or comments regarding the LEP Plan may be submitted to the City of Satsuma at the following address:

Vicki Miller
P.O. Box 517, Satsuma, AL 36572
251-675-1440
www.cityofsatsuma.com

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 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 checked="" 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. **N/A**

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

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 2015-09-03 ADOPTING A TITLE VI PLAN

WHEREAS, the City of Satsuma 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

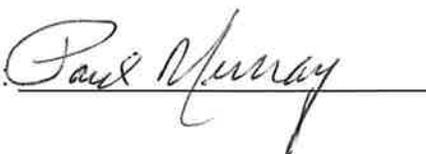
WHEREAS, the City of Satsuma commits to assure that no person shall, on the grounds of race, color, national origin, or sex; as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity regardless of the funding source;

NOW, THEREFORE, be it resolved by the City Council of the City of Satsuma as follows:

The Council approves the proposed Title VI Program in order to comply with the Title VI federal requirements.

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

Adopted this 15th day of September, 2015.

Signature: 

Typed Name: Paul Murray

Title: Mayor

Attest: 

Typed Name: Vicki Miller

Title: City Clerk

