City of Satsuma

TITLE VI PROGRAM

June 21, 2022

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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 activities related to Title VI. The City of Satsuma's Title VI Coordinator is Heather Davis, City Clerk, who can be contacted at (251) 675-1440 and/or hdavis@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 and at all transit stations and/or stops. This notice will be translated into other languages 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 they have 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 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 City of Satsuma's website. If information is needed in another language, the complainant can contact (251) 675-1440. The statement "If information is needed in another language, contact -(251) 675-1440 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 complaint forms should be submitted to:

Heather Davis
City Clerk
City of Satsuma
PO Box 517
Satsuma, AL 36572
(251) 675-1440
hdavis@cityofsatsuma.com

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 them 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 and signed.

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 does not receive the additional information from the complainant 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, they 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, they have 15 days after the date of the closure letter or the LOF to submit an appeal letter to the City of Satsuma.

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 Blvd
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 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. Active Title VI transit-related 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.

No Title VI transit-related investigations, complaints, or lawsuits have occurred since the previous submission of the Title VI Program to ALDOT. A template of the Log of Transit-Related Title VI Transit Investigations, Complaints, and Lawsuits 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 commits to provide early and continuous opportunities for public participation in the transit decision-making process. These opportunities are open to everyone including minority, low-income, and Limited English Proficient (LEP) populations. The Public Participation Plan provides for an open exchange of information and ideas between the public and transit decision makers. The City of Satsuma's Public Participation Plan is ongoing and reviewed regularly to identify, meet, and serve the community's needs.

In an effort to integrate the opinions of minority, low-income, and LEP populations into community outreach activities, the City of Satsuma's Public Participation Plan 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 at City of Satsuma public buildings, including the library and Senior Center.

- Utilize the media (social media, local newspapers and magazines, radio, television, etc.) to notify minority, low-income, and LEP populations of public involvement efforts.
- Provide opportunities for public participation through means other than written communication, such as virtual meetings, personal interviews, or the use of recording devices to capture oral comments.
- Hold virtual meetings that are convenient and accessible to the minority, low-income, and LEP populations. Partner with libraries to provide computers, internet access, and assistance. Provide a call-in option for those unable to attend via computer.
- Hold in-person public meetings in locations, facilities, and at meeting times that are convenient and accessible to the minority, low-income, and LEP populations.
- Ensure the decision-making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.
- Develop transit and Title VI information in English and other languages as needed.
- Make public information available in electronically accessible formats.

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

- Meeting notifications have been published in outlets that service minority, low-income, and LEP populations.
- City of Satsuma staff members attended local meetings to identify community needs and to participate as a stakeholder agency.
- City of Satsuma staff members participated in public outreach efforts to explain specific transit proposals and to solicit comments. These outreach efforts included interactions at public open houses and virtual events.
- Public notices were posted on the City of Satsuma's website.

The Public Participation Plan is evaluated with the assistance of the public who participate in public involvement activities and events. The Public Participation Effectiveness Survey in Appendix D is used to monitor changes in demographics and track the effectiveness of the City of Satsuma's public involvement activities and events held in-person and virtually. Names are not collected so responses are anonymous. The survey is available in English and languages that are commonly spoken by LEP persons in the City of Satsuma's service area. Participants are encouraged to request assistance from staff members as needed.

Surveys completed after in-person activities and events are deposited into drop boxes by participants. Drop boxes are positioned near exits and clearly labeled in English and languages that are commonly spoken by LEP persons in the City of Satsuma's service area.

The survey form is uploaded to a survey platform (Google Forms, SurveyMonkey, etc.) to collect anonymous submissions after virtual events.

VI. Limited English Proficiency 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:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service sponsored by the City of Satsuma. In addition to the number or proportion of LEP persons served, the analysis identifies:

    A. How LEP persons interact with the City of Satsuma;

    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 or whether translated auditory resources will be more effective; and

    D. Whether or not LEP persons are underserved by the City of Satsuma due to language barriers.

2. The frequency with which LEP persons come into contact with the City of Satsuma's program, activities, or services. The following areas were evaluated:

    A. Transit user demographics;

    B. Public meeting participation;

    C. Customer service interactions in-person, over the phone, and online, (including e-mail and social media);

    D. Rider surveys; and

    E. Operator surveys.

3. The nature and importance of programs, activities, or services provided by the City of Satsuma to people's lives.

4. The resources available to the City of Satsuma for outreach to LEP persons and the costs associated with that outreach.

The City of Satsuma developed a Limited English Proficiency Plan which is located in Appendix E. 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

In accordance with the Safe Harbor Provision, the City of Satsuma identified the no language group exceeded 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 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 that are selected by the City of Satsuma. If the City of Satsuma establishes advisory bodies, a table will be used to depict the racial breakdown of the membership and will be included in future Title VI programs. A sample table is included in Appendix F. 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

When acquiring land and/or constructing 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 Federally funded transit 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 subsequent provisions.

The City of Satsuma will complete a Title VI equity analysis during the planning stage of any new facility related to the potential site location to ensure the location is selected without regard to race, color, or national origin. Wherever necessary and/or required, the City of Satsuma will engage in outreach to persons potentially impacted by the placement of facilities. A Title VI equity analysis will be completed before the site selection to compare the equity impacts of various alternatives. A copy of the Title VI Construction Project Analysis form that will be used to perform the equity analysis can be found in Appendix G.

IX. Additional Title VI Information

Additional Title VI information is included in Appendix H.

X. Board Meeting Resolution of Approved Title VI Program

The City of Satsuma City Council approved the Title VI Program on June 21, 2022. A copy of the Resolution is included as Appendix I.

Appendix A

Title VI Notice to the Public

(This notice shall be posted on the agency's website and in all transit vehicles, stations, stops, receptionist areas, and/or meeting rooms.)

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
PO Box 517
Satsuma, AL 36572
(251) 675-1440
hdavis@cityofsatsuma.com

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 provider meets the Safe Harbor Threshold, then the following statement should be posted in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold: "If information is needed in another language, contact <TELEPHONE NUMBER>".*

Appendix B

Title VI Complaint Form

Section I	
Name:	
Address:	
Phone (Home or Cell):	Phone (Work):
E-mail:	
Section II	
Are you filing this complaint on your own behalf?	☐ Yes ☐ No
If you answered "yes" to this question, go to **Section III**.	
If not, please supply the name and relationship of the person for whom you are submitting a complaint:	
Please explain why you have filed for a third party:	
Please confirm that you obtained the permission of the aggrieved party if you are filing on their behalf.	☐ Yes ☐ No
Section III	
I believe the discrimination I experienced was based on (check all that apply):	
☐ Race ☐ Color ☐ National Origin	
Date of Alleged Discrimination (MM/DD/YYYY): _____	
Explain as clearly as possible what happened and why you believe you were the target of discrimination. 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?	☐ Yes ☐ No
Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ☐ Yes ☐ No If yes, check and specify all that apply: ☐ Federal Agency: _____ ☐ Federal Court: _____ ☐ State Agency: _____ ☐ State Court: _____ ☐ Local Agency: _____	
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Phone:	
E-mail:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Phone:	
E-mail:	

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, by mail, or via e-mail using the contact information below:

Heather Davis
City of Satsuma
PO Box 517
Satsuma, AL 36572
hdavis@cityofsatsuma.com

Appendix C

Log of Transit-Related Title VI Investigations, Complaints, and Lawsuits

	Date (MM/DD/YYYY)	Summary of Allegations (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

Public Participation Effectiveness Survey

This is a tool to be provided in the future.

Date of Public Involvement Activity or Event: <**DATE**>
Transit Project: <**PROJECT NAME**>

Thank you for participating in our planning process! Your engagement helps the City of Satsuma improve transit services for our service area. Please complete the brief survey below so we can learn how to improve our public involvement activities and events. Your feedback is anonymous.

Please inform a staff member if you need this survey in a different language or require assistance to complete it.

1. How much do you agree or disagree with each statement below?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
• I understand the purpose of this public involvement activity or event.	○	○	○	○	○
• I understand the purpose of the project.	○	○	○	○	○
• Everyone who wanted to speak was given time to do so.	○	○	○	○	○
• This public involvement activity or event was planned in a way that those affected could participate regardless of having limited English proficiency, disabilities, lack of access, or any other barriers.	○	○	○	○	○
• Resources (translation services, materials in the languages of the affected communities, etc.) were provided to persons with limited English proficiency.	○	○	○	○	○
• The public involvement process increased my trust of the agencies involved in the project.	○	○	○	○	○
	○	○	○	○	○

- Overall, I am satisfied with this public involvement activity or event.

2. How would you improve the public involvement process?

3. How did you learn about this public involvement activity or event? Please be specific.

4. Which languages do you read, write, and/or understand?

5. How well do you read English?
   - ○ Very well
   - ○ Somewhat well
   - ○ Not well

6. How well do you understand spoken English?
   - ○ Very well
   - ○ Somewhat well
   - ○ Not well

Appendix E

Census Data

Table: ACSST5Y2020.S1601

LANGUAGE SPOKEN AT HOME	
Note: The table shown may have been modified by user selections. Some information may be missing.	
DATA NOTES	
TABLE ID:	S1601
SURVEY/PROGRAM:	American Community Survey
VINTAGE:	2020
DATASET:	ACSST5Y2020
PRODUCT:	ACS 5-Year Estimates Subject Tables
UNIVERSE:	None
FTP URL:	None
API URL:	https://api.census.gov/data/2020/acs/acs5/subject
USER SELECTIONS	
GEOS	Satsuma city, Alabama
TOPICS	Language Spoken at Home
EXCLUDED COLUMNS	Satsuma city, Alabama!!Total!!Margin of Error
	Satsuma city, Alabama!!Percent!!Margin of Error
	Satsuma city, Alabama!!Percent of specified language speakers!!Speak English only or speak English "very well"!!Margin of Error
	Satsuma city, Alabama!!Percent of specified language speakers!!Percent speak English only or speak English "very well"!!Margin of Error
	Satsuma city, Alabama!!Percent of specified language speakers!!Speak English less than "very well"!!Margin of Error
	Satsuma city, Alabama!!Percent of specified language speakers!!Percent speak English less than "very well"!!Margin of Error
APPLIED FILTERS	None

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Table: ACSST5Y2020.S1601

APPLIED SORTS	None
PIVOT & GROUPING	None
WEB ADDRESS	https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&g=1600000US0168352&tid=ACSST5Y2020.S1601&moe=false
TABLE NOTES	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2020, the 2020 Census provides the official counts of the population and housing units for the nation, states, counties, cities, and towns. For 2016 to 2019, the Population Estimates Program provides estimates of the population for the nation, states, counties, cities, and towns and intercensal housing unit estimates for the nation, states, and counties.
	Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section. Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.
	Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates
	Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.
	The 2016-2020 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.

Table: ACSST5Y2020.S1601

	Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.
	Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution.N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available.median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-")median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+").** The margin of error could not be computed because there were an insufficient number of sample observations.*** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution.***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.
COLUMN NOTES	None

Table: ACSST5Y2020.S1601

	Satsuma city, Alabama					
	Total	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over	5,752	(X)	5,698	99.1%	54	0.9%
Speak only English	5,679	98.7%	(X)	(X)	(X)	(X)
Speak a language other than English	73	1.3%	19	26.0%	54	74.0%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	54	0.9%	0	0.0%	54	100.0%
5 to 17 years old	24	0.4%	0	0.0%	24	100.0%
18 to 64 years old	30	0.5%	0	0.0%	30	100.0%
65 years old and over	0	0.0%	0	-	0	-
Other Indo-European languages	0	0.0%	0	-	0	-
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	0	0.0%	0	-	0	-
Asian and Pacific Island languages	0	0.0%	0	-	0	-
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	0	0.0%	0	-	0	-
Other languages	19	0.3%	19	100.0%	0	0.0%
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	19	0.3%	19	100.0%	0	0.0%
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	4,879	(X)	4,849	99.4%	30	0.6%
Speak only English	4,830	99.0%	(X)	(X)	(X)	(X)
Speak a language other than English	49	1.0%	19	38.8%	30	61.2%
Spanish	30	0.6%	0	0.0%	30	100.0%
Other languages	19	0.4%	19	100.0%	0	0.0%

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LIMITED ENGLISH PROFICIENCY PLAN

City of Satsuma
PO Box 517
Satsuma, AL 36572
(251) 675-1440
hdavis@cityofsatsuma.com
www.cityofsatsuma.com

Introduction

This Limited English Proficiency Plan was prepared to address the City of Satsuma's responsibilities as a recipient of Federal financial assistance relating to the needs of individuals with limited English proficiency. This plan was 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 based on race, color, or national origin.

Plan Summary

The City of Satsuma developed this Limited English Proficiency Plan to help identify reasonable steps to provide 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/or 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.

As the first step in preparing this plan, the City of Satsuma completed the U.S. DOT Four Factor Analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service sponsored by the City of Satsuma

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 people's lives

4. The resources available to the City of Satsuma for outreach to LEP persons and the costs associated with that outreach.

Four Factor Analysis Results

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service sponsored by the City of Satsuma

The City of Satsuma reviewed the 2020 U.S. Census Report and determined that the total population for City of Satsuma is 5752. Of those persons, 54 (0.9%) residents report speaking English less than very well. Those persons with limited English proficiency speak the following languages at home: 54 speak Spanish, 0 speak other Indo-European languages, 0 speak Asian and Pacific Island languages, and 0 speak other languages. The most popular language spoken at home (other than English) is Spanish. The City of Satsuma 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 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 were identified:

Contact Points	Frequency *(Low, Medium, or High)*
Drivers – Fixed Route	N/A
Drivers – Demand Response	Low
Information Line	N/A
Dispatchers	Low
Route Guides	Low
Reservationist	Low
Website	Low
Social Media	Low
Receptionist	Low
Field Supervisors	N/A
Annual Programs, Activities, and Events	N/A

3. The nature and importance of programs, activities, or services provided by the City of Satsuma to people's lives

Since 2011, the City of Satsuma has been providing transportation to the City's elderly and disabled population. When this program began, City leaders underestimated the impact of this program. This year, hundreds of rides are provided to the City's senior and disabled residents. Many folks have come to depend on this service as they have no other means of transportation. The bus takes seniors and disabled residents to doctor's appointments, physical therapy, dialysis, grocery shopping, and to the drug store to name a few. All of the residents are extremely grateful for this service as they wouldn't have any other means of transportation.

The transportation service is available by reservation on Monday through Friday. A user requests service within 24 hours. Based on the number of calls, a route map will be developed for the week. These maps will be kept on file and reviewed periodically to make sure the program is being run as efficient as possible. The Senior Services Coordinator schedules the transportation with the client and works with the drivers to make sure all the transportation services are met. She strives to make sure everyone who calls is served and provided transportation. Information on the program can be

found on the City's website www.cityofsatsuma.com.

4. The resources available to the City of Satsuma for outreach to LEP persons and the costs associated with that outreach

The City of Satsuma assessed its resources and determined that funds are available within the current budget for providing language assistance. The City of Satsuma 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 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 Plan Outline

Five action items comprise the City of Satsuma's Limited English Proficiency Plan:

1. Identify Individuals Requiring Language Assistance
2. Provide Language Assistance
3. Train Staff
4. Provide Notice to LEP Persons
5. Monitor and Update the Limited English Proficiency Plan

1. Identify Individuals Requiring Language Assistance

The City of Satsuma identifies an LEP person who requires language assistance by:

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

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

- Assigning a staff person to greet participants as they arrive at events sponsored by the City of Satsuma. By engaging participants in conversation, staff may informally gauge each attendee's ability to speak and understand English.

2. Provide Language Assistance

The City of Satsuma 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 City of Satsuma's programs and services through these organizations;

- Posting the City of Satsuma's Title VI Notice, Complaint Procedures, Complaint Form, and Limited English Proficiency Plan on the City of Satsuma'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 online content) available in other languages;

- Providing a bilingual or multilingual Community Outreach Coordinator at community events and public hearings;

- Placing statements in notices, publications, and online content 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 City of Satsuma's fleet, in field supervisor vehicles, at the administrative office, and at public meetings;

- Utilizing telephone translation services.

3. Train Staff

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

- Developing a curriculum and corresponding presentation 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 City of Satsuma;

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

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

4. Provide Notice to LEP Persons

The City of Satsuma will provide notice to LEP persons in both oral and written communications by:

- Offering general information, such as hours of operation, fares, etc., on the City of Satsuma's customer service line in multiple languages;

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

- Providing the following written communications in English;

    - Introduction section of the City of Satsuma's Route Guides which contains information on fares, accessibility, fare/ticket discounts, and general riding information;

    - Temporary signs at stations/stops and transit centers informing customers of any detours and route changes;

    - Fliers onboard the City of Satsuma's fleet containing information about route changes, rider alerts, fare increases, and public meetings;

    - Signage that displays safety or system policy information;

    - Interior bus signage displaying cash fare cost of monthly discount passes and special promotions and campaigns; and

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

5. Monitor and Update the Limited English Proficiency 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 Limited English Proficiency 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 the City of Satsuma's Title VI Program.

The City of Satsuma will monitor and update its Limited English Proficiency Plan by:

- Determining how the needs of LEP persons are 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 are 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 Limited English Proficiency Plan; and

- Determining whether complaints were received concerning the City of Satsuma's failure to meet the needs of LEP individuals.

Dissemination of the City of Satsuma's Limited English Proficiency Plan

The Limited English Proficiency Plan will be disseminated to customers and the community by:

- Publishing the Limited English Proficiency Plan and the Title VI Program on the City of Satsuma's website so that any person or agency with internet access can view and download these documents. Alternatively, any person or agency may request a copy of the documents 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 City of Satsuma will accommodate such requests.

- Sharing updates to the Limited English Proficiency Plan on the City of Satsuma's social media sites.

- Distributing the Limited English Proficiency Plan to human service organizations in the service area.

Questions or comments regarding the Limited English Proficiency Plan may be submitted to the City of Satsuma using the following contact information:

Heather Davis, City Clerk
PO Box 517
Satsuma, AL 36572
(251) 675-1440
hdavis@cityofsatsuma.com
www.cityofsatsuma.com

Alabama Department of Transportation **Language Identification Cards**

Card 1 of 2 *Instructions: Place a check by the language spoken.* ☑

☐ Mark this box if you read or speak English.	*English*
☐ ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	*Arabic*
☐ Խնդրում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	*Armenian*
☐ যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	*Bengali*
☐ ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	*Cambodian*
☐ Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	*Chamorro*
☐ 如果你能读中文或讲中文，请选择此框。	*Simplified Chinese*
☐ 如果你能讀中文或講中文，請選擇此框。	*Traditional Chinese*
☐ Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	*Croatian*
☐ Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	*Czech*
☐ Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	*Dutch*
☐ اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	*Farsi*
☐ Cocher ici si vous lisez ou parlez le français.	*French*
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	*German*
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	*Greek*
☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	*Haitian Creole*
☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	*Hindi*
☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	*Hmong*
☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	*Hungarian*

Source: *Language Identification Flashcard - 2004 Census Test*
U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce
www.lep.gov/ISpeakCards2004.pdf

AWI / OCR
9/15/2005

Alabama Department of Transportation **Language Identification Cards**

Card 2 of 2 *Instructions: Place a check by the language spoken.* ☑

☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	*Ilocano*
☐ Marchi questa casella se legge o parla italiano.	*Italian*
☐ 日本語を読んだり、話せる場合はここに印を付けてください。	*Japanese*
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	*Korean*
☐ ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	*Laotian*
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	*Polish*
☐ Assinale este quadrado se você lê ou fala português.	*Portuguese*
☐ Însemnaţi această căsuţă dacă citiţi sau vorbiţi româneşte.	*Romanian*
☐ Пометьте этот квадратик, если вы читаете или говорите по-русски.	*Russian*
☐ Обележите овај квадратић уколико читате или говорите српски језик.	*Serbian*
☐ Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	*Slovak*
☐ Marque esta casilla si lee o habla español.	*Spanish*
☐ Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	*Tagalog*
☐ ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	*Thai*
☐ Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	*Tongan*
☐ Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	*Ukranian*
☐ اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	*Urdu*
☐ Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	*Vietnamese*
☐ באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	*Yiddish*

Source: *Language Identification Flashcard - 2004 Census Test*
U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce
www.lep.gov/ISpeakCards2004.pdf

AWI / OCR
9/15/2005

Appendix F

Table Depicting Minority Representation on Planning and Advisory Bodies

	Number of People Represented on the Committee					
	Caucasian	**Hispanic or Latino**	**African American**	**Asian American**	**Native American**	**Other: _____**
Population						
<Name of Committee>						
<Name of Committee>						
<Name of Committee>						

Appendix G

Title VI Construction Project Analysis

Name of Agency:_____

Contact Person:_____ Title: _____

Mailing Address: _____

City/State/ZIP: _____

Phone: _____ E-mail: _____

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

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

2. Describe the adverse effects the project would have on the groups identified above both during and after construction.

_____
_____
_____
_____
_____
_____
_____
_____
_____

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, and water pollution.

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

6. For each of the identified low-income and/or minority communities and minority-owned businesses, describe the potential 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. Provide a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation and environmental enhancement actions implemented in predominantly non-low-income and non-minority areas if the project traverses these different areas. If there is no basis for such a comparison, describe why that is so.

Appendix H

Additional Title VI Information

All ALDOT subrecipients must address each of the following:

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

   None at this time.

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

   None at this time.

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

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

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

4. Does your agency provide transportation services to minority communities?

   X Yes ☐ No

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

   X Black American ☐ Sub-Continent Asian-American
   X Hispanic American ☐ Asian-Pacific American
   X Native American ☐ Other

5. Did your Title VI Coordinator/EEO Officer change 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 Title VI Coordinator/EEO Officer.

   Heather Davis, City Clerk
   PO Box 517
   Satsuma, AL 36572
   (251) 675-1440
   hdavis@cityofsatsuma.com

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

   ☐ Yes X 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 percentage of LEP populations and/or populations impacted by environmental injustice were affected by the project and/or service change?

Appendix I

Documentation of Title VI Authorization

RESOLUTION 2202-06-03

ADOPTING A TITLE VI PROGRAM

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 City Council approves the proposed Title VI Program in order to comply with the Title VI Federal requirements.

The City Clerk in their capacity, will serve as the Title VI Coordinator and is authorized to revise and update the Title VI Program as necessary.

Adopted this 21st day of June, 2022.

Signature: Mark Barlow

Attest: Heather Davis

Printed Name: Mark Barlow

Printed Name: Heather Davis

Title: Mayor

Title: City Clerk