

# **BALDWIN COUNTY COMMISSION BALDWIN REGIONAL AREA TRANSIT SYSTEM**

## **TITLE VI PROGRAM**

November 16, 2021

312 Courthouse Square, Suite 12  
Bay Minette, Alabama 36507  
251-937-0264  
[www.baldwincountyal.gov](http://www.baldwincountyal.gov)

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*(All sections are required.)*

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## **I. Policy Statement**

The Baldwin County Commission and Baldwin Regional Area Transit System (BRATS) 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 access for Limited English Proficient (LEP) persons.

The purpose of this plan is to assist the Baldwin County Commission, Baldwin Regional Area Transit System in its administration and management of Title VI related activities. The Baldwin County Commission’s Title VI Coordinator for the Baldwin Regional Area Transit System is Ann Simpson, Director of Transportation. She can be contacted at 251-972-6817 and/or [ann.simpson@baldwincountyal.gov](mailto:ann.simpson@baldwincountyal.gov).

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

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

The Baldwin Regional Area Transit System has posted the Title VI Notice on the agency’s website and in public areas of the agency’s office(s) including the receptionist area and meeting rooms. The notice is also posted in all transit vehicles and at all transit stations and/or stops. 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System/Baldwin Regional Area Transit System’s website\*. Completed forms should be submitted to:

Ann Simpson  
Director of Transportation  
Baldwin County Commission  
Baldwin Regional Area Transit System  
P. O. Box 907  
Robertsdale, AL 36567  
251-972-6817  
Fax: 251-972-6841  
ann.simpson@baldwincountyal.gov

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

The Baldwin County Commission/Baldwin Regional Area Transit System has 15 business days to investigate the complaint. If more information is needed to resolve the case, the Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the involved 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 or if they demand further action, the complaint will be referred to Mr. Wayne Dyess, Baldwin County Administrator, 312 Courthouse Square, Suite 12, Bay Minette, AL 36507.

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, contact 251-972-6814.**

**\*Si se necesita información en otro idioma, el reclamante puede comunicarse al 251-972-6814.**

\*If provider meets the safe harbor threshold: At a minimum, the statement “If information is needed in another language, then contact 251-972-6814” should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

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

The Baldwin County Commission/Baldwin Regional Area Transit System 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.

There have been no Title VI transit-related investigations, complaints, or lawsuits received by the Baldwin County Commission/Baldwin Regional Area Transit System. 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System’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 Baldwin County Commission/Baldwin Regional Area Transit System’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 transit websites, in the receptionist areas, on transit vehicles, and at stations/stops.
- Utilize the media (newspaper, radio, television, mobile transit app) 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.
- Make public information available in electronically accessible formats.
- Distribute information 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 transit mobile app.
- 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 Baldwin County Commission/Baldwin Regional Area Transit System has participated in the following public outreach and involvement activities:

- Baldwin County Commission/Baldwin Regional Area Transit System staff members have participated in and supported Community-Based Transportation Programs for disadvantaged communities.
- Public Meetings have been held at convenient times and accessible locations for the LEP populations.
- Meeting notifications have been published in newspapers that service minorities.
- Baldwin County Commission/Baldwin Regional Area Transit System staff members have attended local meetings to identify community needs and to participate as a stakeholder agency.
- Baldwin County Commission/Baldwin Regional Area Transit System staff members have participated in public outreach efforts to explain specific transit proposals and to solicit comments. These outreach efforts include interactions at public open houses.
- Public notices have been posted on the transit website, in the receptionist area, on the buses, and at bus stops.

## **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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System's program. In addition to the number or proportion of LEP persons served, the analysis identified:
  1. How LEP persons interact with the Baldwin County Commission/Baldwin Regional Area Transit System;
  2. Identification of 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 Baldwin County Commission/Baldwin Regional Area Transit System due to language barriers.
- B. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:
  1. Bus and rail service users;
  2. Trips scheduled through the mobile app, websites, and over the phone;
  3. Public meeting participation;
  4. Customer service interactions;
  5. Ridership surveys; and
  6. Operator surveys.
- C. The nature and importance of the Baldwin County Commission/Baldwin Regional Area Transit System's program to people's lives.
- D. The resources available for LEP outreach and the costs associated with that outreach.

The Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System 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

*(Providers must offer written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered by their program.)*

In accordance with the Safe Harbor Provision, the Baldwin County Commission/Baldwin Regional Area Transit System has identified that 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. These language groups are also listed in Appendix D. The Baldwin County Commission/Baldwin Regional Area Transit System 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 upon request. The Baldwin County Commission/Baldwin Regional Area Transit System also provides free translation services upon request.

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

*(Minorities include American Indian & Alaska Native, Asian, Black, Hispanic or Latino, and Native Hawaiian or Other Pacific Islander.)*

The Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System has transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by the Baldwin County Commission/Baldwin Regional Area Transit System. A table depicting the racial breakdown of the membership of these committees can be found in Appendix E.

All committees actively recruit and continue to reach out to community groups to find additional diverse individuals to represent the population and help provide experience and ideas to better transit services. All committees encourage participation by posting applications and information on the Baldwin County Commission/Baldwin Regional Area Transit System's website regarding the need for additional members.

### **VIII. Guidance on Determining Site or Location of Facilities**

In the event that the Baldwin County Commission/Baldwin Regional Area Transit System decides to acquire land and/or construct facilities, the Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

The Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission originally approved the Title VI program on September 3, 2013 and then approved an updated Title VI Program on November 16, 2021. A copy of the authorizing resolution is included as Appendix H.

## **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**

**Baldwin County Commission, Baldwin Regional Area Transit System 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 Baldwin County Commission, Baldwin Regional Area Transit System.**

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

**Baldwin Regional Area Transit System  
P. O. Box 907, 18100 County Road 54  
Robertsdale, AL 36567  
251-972-6817  
[www.baldwincountyal.gov](http://www.baldwincountyal.gov)**

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

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

**If information is needed in another language, then contact 251-972-6817.**  
**Si sen necesita informacion en otro idioma, comuniquese al 251-972-6817.**

*If provider meets the Safe Harbor Threshold, then the following statement at a minimum 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, then contact <TELEPHONE NUMBER>".*

## Appendix B

### Title VI Complaint Form

<b>Section I</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
<b>Section II</b>		
Are you filing this complaint on your own behalf? Circle	Yes	No
If you answered "yes" to this question, go to <b>Section III</b> .		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party: _____		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
<b>Section III</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency? Circle	Yes	No
<b>Section V</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No 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: _____		
<b>Section VI</b>		
Name of agency complaint is against: _____		
Contact person: _____		
Title: _____		
Telephone number: _____		

Attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

Ann Simpson  
Director of Transportation  
Baldwin Regional Area Transit System  
P. O. Box 907  
Robertsdale, AL 36567

*If provider meets the Safe Harbor Threshold, then this form must be provided in English and any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.*

## Appendix C

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

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status Pending or Closed</b>	<b>Action(s) Taken</b>
<b>Investigations</b>	<b>NONE</b>			
<b>1.</b>				
<b>2.</b>				
<b>Complaints</b>	<b>NONE</b>			
<b>1.</b>				
<b>2.</b>				
<b>Lawsuits</b>	<b>NONE</b>			
<b>1.</b>				
<b>2.</b>				

## **Appendix D**

# **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Baldwin Regional Area Transit System  
18100 County Road 54  
Robertsdale, Alabama 36567  
251-972-6814  
[www.baldwincountyal.gov](http://www.baldwincountyal.gov)

## **Introduction**

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

The Baldwin County Commission/Baldwin Regional Area Transit System reviewed the 2010 U.S. Census Report and determined that the total population for Baldwin County is 160,414 and 4,100 persons (2.4%) speak a language other than English. Of those persons, 4,100 (2.4%) residents report speaking English less than very well. Those persons with limited English proficiency are in the following groups: 2,963 speak Spanish, 445 speak Indo-European languages, 639 speak Asian and Pacific Island languages and 53 speak other languages. The most popular language spoken at home (other than English) is Spanish. The Baldwin County Commission/Baldwin Regional Area Transit System 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 <AGENCY>'s programs, activities, or services.***

The Baldwin County Commission/Baldwin Regional Area Transit System 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 - Demand Response	Minimum
Reservationist	Minimum
Web Site	Minimum
Field Supervisors	Minimum

3. ***The nature and importance of programs, activities, or services provided by the Baldwin County Commission/Baldwin Regional Area Transit System to the LEP population.***

The largest geographic concentration of LEP individuals in the Baldwin County Commission/Baldwin Regional Area Transit System's service area are Spanish speaking residents. Baldwin Regional Area Transit System operates a demand-response system and services Spanish speaking passengers. It is also likely that the Baldwin County Commission/Baldwin Regional Area Transit System will encounter LEP individuals at community outreach events.

4. ***The resources available to the Baldwin County Commission/Baldwin Regional Area Transit System and the overall cost to provide LEP assistance.***

The Baldwin County Commission/Baldwin Regional Area Transit System assessed its resources that could be used for providing LEP assistance. The Baldwin County

Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System'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 Baldwin County Commission/Baldwin Regional Area Transit System 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.
- Survey 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 Baldwin County Commission/Baldwin Regional Area Transit System sponsored events. By engaging participants in conversation, it is possible to informally gauge each attendee's ability to speak and understand English.
- Providing Language Identification Flash Cards at public meetings.

#### **2. Providing Language Assistance**

The Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System's programs and services

through these organizations.

- Implementing a Hispanic Education and Outreach program.
- Posting the Baldwin County Commission/Baldwin Regional Area Transit System'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.
- Offer Language Identification Flash Cards upon request.
- Providing language translation for LEP persons on the BRATS On Demand mobile app.
- Utilizing a web-based translation service application such as Google Translate.
- Utilizing telephone translation services.

### **3. Training Staff**

The Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System.
- 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 Baldwin County Commission/Baldwin Regional Area Transit System will provide notice to LEP persons in both oral and written communications by:

- Offering general information, such as operation hours, fares, etc., on the Baldwin County Commission/Baldwin Regional Area Transit System's customer service line.
- Implementing the use of an automated greeting in both <LANGUAGE> and English, directing callers to select which language they prefer.
- Providing the following written communications in both English and Spanish:
  - Brochures/Flyers
  - 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System's service area, and/or during the process of updating Title VI Program.

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

**Dissemination of the Baldwin County Commission/Baldwin Regional Area Transit System'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 Baldwin County Commission/Baldwin Regional Area Transit System's website so that any person or agency with internet access can view and download these plans. Alternatively, any person or agency may also request a copy of the plan at no cost via telephone, fax, mail, or in person. LEP individuals may request that these plans be translated into various languages. If feasible, the Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System at the following address:

**Ann Simpson  
Director of Transportation  
P. O. Box 907  
Robertsdale, Alabama 36567  
251-972-6817  
[www.baldwincountyal.gov](http://www.baldwincountyal.gov)**

## Appendix E

Table Depicting Minority Representation on Planning and Advisory Bodies

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
Name of Committee					
Steering Committee	4	1	1		
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.

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

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

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

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

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

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

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

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

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## Appendix G

### Additional Title VI Information

All subrecipients must address each of the following:

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

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 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

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.

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

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

*(Provide Title VI Authorizing Resolution, Minutes, or Similar Documentation)*