

SHELBY COUNTY

TITLE VI PLAN

March 9, 2015

**P. O. Box 467
Columbiana, AL 35051
(205) 670-6510
<http://www.shelbyal.com>**

**This document was prepared in accordance with the FTA Circular 4702.1B, dated
October 1, 2012.**

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**Shelby County
Title VI Plan**

Agency Name: Shelby County

Date Adopted: March 9, 2015

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides 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 meaningful access for Limited English Proficient (LEP) persons. See Appendix A.

Shelby County Community Services is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in The Civil Rights Act of 1964.

This plan was developed to guide Shelby County in its administration and management of Title VI-related activities.

Title VI Coordinator Contact Information:

Reginald Holloway, Manager, Community Services, 200 W. College Street, P.O. Box 467, Shelby County, Alabama 35051
Phone (205) 670-6556: Email – rholloway@shelbyAL.com.

II. Notice to the Public

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

Shelby County has posted the Title VI Notice on the County's website and in public areas of the Community Services' office(s) including the receptionist area and meeting rooms. The notice is also posted in all transit vehicles. This notice will be translated into languages other than English as needed. Please see Appendix G.

III. Covered Program

In 2002 Shelby County received a Federal grant to purchase a bus in which Shelby County's twenty percent (20%) contribution resulted in an eighty percent (80%) match. Shelby County does not receive any federal or state funds for the program it operates. The State will maintain the title to the bus until it reaches its life expectancy, at which time the title will be transferred to Shelby County.

The primary purpose for the use of the bus is centered around seniors that attend senior centers. Shelby County does not provide transportation on a daily or fee-based basis but on a requested basis for social and recreational purposes. This avoids senior citizens having to lease a bus to attend such events. As noted above, Shelby County does not charge a fare for use of the bus by Shelby County's seniors. The bus driver is a contract driver and the fuel for the bus is charged to a County department. The bus driver will be requested to read this Plan and sign the Acknowledgment set out in Appendix B. ClasTran is permitted to use the bus if they need it.

ClasTran (a non-profit Para-transit provider) is Shelby County's contracted transportation provider for its citizens to be transported within the County and to and from Jefferson County. ClasTran provides transportation to our citizens when they call in and schedule a ride. ClasTran can be reached at (205) 325-8787 or the website can be visited at <http://www.clastran.com/>

Among the seniors citizens' centers that are served are the following:

Alabaster	1097 7ths Street, SW	Alabaster, AL 35007
Calera	15863A Hwy 25	Calera, AL 35040
Chelsea	680 Hwy 36	Chelsea, AL 35043
Columbiana	194 Washington Street	Columbiana, AL 35051
Dunnavant	11690 Hwy 41	Leeds, AL 35094
Harpersville	38937 Hwy 25	Harpersville, AL 35078
Heardmont	5452 Cahaba Valley Road	Birmingham, AL 35242
Helena	222 Tucker Road	Helena, AL 35080
Montevallo	434 Vine Street	Montevallo, AL 35115
Pea Ridge	6161 Hwy 10	Montevallo, AL 35115
Pelham	50 Racquet Club Parkway	Pelham, AL 35124
Vandiver-Sterrett	12205 Hwy 43	Vandiver, AL 35147
Vincent	19 John Sparkman Court	Vincent, AL 35178
Westover	3312 Westover Road	Westover, AL 35147

IV. Subcontracts and Vendors

There are no subcontractors or vendors who receive payments from Shelby County where funding originates from any federal assistance subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

To the extent there are written contracts, they shall contain non-discrimination language.

V. Record Keeping

The Title VI Coordinator will maintain records, which include, but are not limited to, signed acknowledgements of receipt by contract drivers indicating the receipt of the Shelby County Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

VI. Title VI Complaint Procedures

How to File a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e. telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint procedures and complaint form are posted on the Shelby County's website.

The complaint may be filed in writing with Shelby County at the following address:

Reginald Holloway, Title VI Coordinator
Shelby County
c/o Community Services
200 W. College Street
P.O. Box 467
Columbiana, AL 35051

A letter acknowledging receipt of complaint will be mailed within seven days (Appendix D). Please note that in responding to any requests for additional information, a complainant has fifteen (15) business days to provide the information and failure to provide the requested information may result in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

Shelby County will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within fifteen (15) calendar days of receipt of the final written decision from Shelby County, and/or 2), if the complainant is not satisfied with the decision of Shelby County, the complaint can be referred to Mr. Joe Nix, Alabama Department of Transportation, Modal Programs Bureau, 1100 John Overton Drive, Montgomery, Alabama 36110. Lastly, the complainant can file a complaint directly with the FTA. Every effort will be made to respond to Title VI complaints within 15 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by Shelby County a written response will be drafted subject to review by its attorney.

In addition to the complaint process described above, a complainant may file a Title VI complaint directly with the following office:

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

VII. Language Assistance Plan

The Language Assistance Plan uses the Four Factor Analysis to identify Limited English Proficient (LEP) persons that need language assistance, outline how language assistance is available, and describes how staff considers the need of LEP persons. Limited English Proficient persons are identified using the Four Factor Analysis.” The Limited English Proficiency Plan is located by Appendix M.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. This population will be program specific. In addition to the number or proportion of LEP persons served, the recipient's analysis should, at a minimum identify:
 - a. How LEP persons interact with the recipient's office.
 - b. Identification of LEP communities, and assessing the number of 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, in order to determine whether translation of documents will be an effective practice; and
 - d. Whether LEP persons are underserved by the recipient due to language barriers.
2. The frequency with which LEP persons come into contact with the program. Recipients should survey key program areas and assess major points of contact with the public, such as:
 - a. Participation in public meetings
 - b. Customer service interactions
 - c. Online submittals from the public via website
 - d. Contract Drivers
3. The nature and importance of the program, activity or service provided by the program. The largest concentration of LEP individuals in Shelby County are Spanish speaking residents of which there is a very low percentage of those speaking Spanish only. Because the service provided is limited to periodic bus transportation provided to senior citizens and primarily those participating in activities of our senior centers, those likely to encounter LEP individuals are the contract drivers.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resources and cost issues can often be reduced by technological advances, reasonable business practices, and sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Our Limited English Proficiency Plan (LEP) contains the following:

1. Include the results of the Four Factor Analysis, including a description of the LEP population(s) served;
2. Describe how the recipient provides language assistance services by language;
3. Describe how the recipient provides notice to LEP persons about the availability of language assistance;

4. Describe how the recipient monitors, evaluates and updates the language access plan; and
5. Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

VIII. Transit-Related Investigations, Complaints, and Lawsuits

Shelby County 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 Shelby County. 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 H.

IX. Public Participation Plan

Shelby County 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. Shelby County'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, Shelby County'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, and on transit vehicles.
- Ensure that the decision making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.

Shelby County has participated in the following public outreach and involvement activities:

- Notices are posted in senior centers.
- A notice is posted on the County's website.

X. Minority Representation on Planning and Advisory Bodies

Shelby County does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by Shelby County. If Shelby County 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 I for a sample table). In addition, a description of efforts made to encourage the participation of minorities on such committees will be included.

XI. Guidance on Determining Site or Location of Facilities

Shelby County has no construction projects scheduled. In the event that Shelby County receives funding through the Federal Transit Administration to acquire land and/or construct facilities, Shelby County 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. Shelby County shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

Shelby County 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, Shelby County 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 J.

XII. Additional Title VI Information

Additional Title VI information is included in Appendix K.

XIII. Shelby County Commission Resolution of Approved Title VI Program

The Shelby County Commission approved the Title VI program on March 9, 2015. A copy of the **AUTHORIZING RESOLUTION** is included as Appendix L.

Appendix A Title VI Policy

No person shall, on the grounds 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.

All employees of Shelby County are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to *Reginald Holloway, Manager, Community Services, 200 W. College Street, P.O. Box 467, Shelby County, Alabama 35051, Phone (205) 670-6556: Email – rholloway@shelbyAL.com.*

Appendix B Acknowledgment of Receipt of Title VI Plan

I hereby acknowledge the receipt of Shelby County's Title VI Plan. I have read and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

Your signature

Print your name

Date

Appendix C TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires 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." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and sent it to:

Shelby County
c/o Community Services
200 W. College Street
P.O. Box 467
Columbiana, AL 35051

Please print clearly:

Name:

Address:

City, State, Zip Code:

Telephone Number: _____ (home) _____ (cell)
_____ (message)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

_____ race
_____ color
_____ national origin
_____ other _____

What was the date of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe the circumstances of why you believe you were discriminated against:

Please list any and all witnesses' names and phone numbers: _____

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

Reginald Holloway, Manager
c/o Community Services
200 W. College Street
P.O. Box 467
Columbiana, AL 35051
Email: rholloway@shelbyAL.com

Your Signature

Print your name

Date

Appendix D Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main Street
_____, Alabama _____

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Shelby County alleging
_____.

An investigation will begin shortly. If you have any additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (205) 670-6556.

Community Services
200 W. College Street
P.O. Box 467
Columbiana, AL 35051

Sincerely,

Reginald Holloway
Manager and Title VI Coordinator

Appendix E Letter Notifying Complainant that the Complaint is Substantiated.

Today's Date

Ms. Jo Doe
1234 Main Street
_____, Alabama _____

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against Shelby County alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Reginald Holloway
Manager and Title VI Coordinator

Appendix F Letter Notifying Complainant that the Complaint Is Not Substantiated.

Today's Date

Ms. Jo Doe
1234 Main Street
_____, Alabama _____

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against Shelby County alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of the Title VI of the Civil Acts of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial services.

Shelby County has analyzed the materials and facts pertaining to your case for evidence of the City's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing the matter in our files.

You have the right to 1) appeal within fifteen (15) calendar days of receipt of this final written decision from Shelby County, and/or 2) file a complaint directly with the U.S. Department of Transportation and/or the Federal Transit Administration at:

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

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Reginald Holloway
Manager and Title VI Coordinator

Appendix G Title VI Public Notice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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).

Shelby County is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964. **If you feel you are being denied participation in or being denied benefits of the transit services provided by Shelby County Community Services, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Reginald Holloway, Manager
c/o Community Services
200 W. College Street
P.O. Box 467
Columbiana, AL 35051

For more information on filing a complaint, visit our website at <https://www.shelbyal.com> and go to Departments and click on Community Services.

You may also complain to the:
Federal Transit Administration Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington D.C. 20590

If you need assistance in another language call (205) 670-6556.

Appendix H

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 I Table Depicting Minority Representation of Planning and Advisory Bodies

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
Name of Committee					
Name of Committee					
Name of Committee					

Appendix J 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 K Additional Title VI Information

All sub-recipients must address each of the following:

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

None.

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

None.

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

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

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

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

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

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

- 5. Has your Title VI Coordinator/EEO Officer changed during the reporting period or since your last Title VI Plan was approved? No. 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?

Yes.

If yes, please complete the following items:

- a. Provide a brief description of these projects/service changes.

The County received a U.S. Department of Housing and Urban Development, Community Development Block Grant (CDBG) through

ADECA in 2011. The CDGB was for the building of a senior center in the community of Vandiver. A four factor analysis for Limited English Proficiency Persons was conducted for January 2012. Based on the analysis, it was determined Shelby County was not required to develop a LAP.

- 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?

The property did not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the CDBG program. All citizen participation activities are open to the general public. The ADECA website could be utilized to translate some written materials. Additionally, local volunteers were identified who could provide oral translation services at public meetings and during conversations with LEP residents during the project's implementation.

- c. What is the number of percentage of LEP or EJ populations affected by the project and/or service change? 0.62%

Resolution Adopting the Title VI Plan
RESOLUTION 15-03-09-06

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

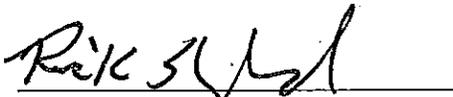
WHEREAS, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance; and

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

NOW, THEREFORE, BE IT RESOLVED, that the Shelby County Commission approves the Title VI Plan in order to comply with the Title VI federal requirements.

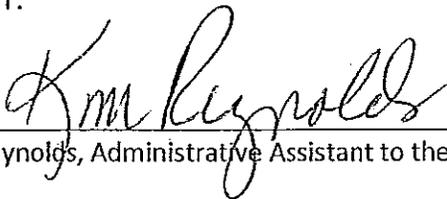
The Manager, Community Services in his capacity, will serve as the Title VI Coordinator and is authorized to revise and update the plan as necessary.

This signature shall denote that this is a certified copy of the Resolution 15-03-09 -06 approved at the Shelby County Commission meeting on March 09, 2015.



Rick Shepherd, Chairperson
Shelby County Commission, Chief Elected Official

ATTEST:



Kim Reynolds, Administrative Assistant to the County Manager

APPENDIX M: Limited English Proficiency Plan (LEP)

1. Four Factor Analysis for Limited English Proficiency Persons in Shelby County

Purpose: In compliance with Title VI of the Civil Rights Act of 1964, Shelby County has developed the following Language Access Plan (LAP) for Limited English Proficiency (LEP) persons.

History: Title VI of the Civil Rights of 1964 is a federal law which prohibits individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

Shelby County Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures Shelby County will undertake to guarantee access by LEP persons to the use of the bus Shelby County maintains primarily for use by seniors that attend senior centers in Shelby County.

1. Number or proportion of LEP persons served or encountered in the eligible service population (served or encountered includes those persons who would be served by the recipient if the person received education and outreach and the recipient provided sufficient language services).

Shelby County utilized data drawn from the U.S. Census American Fact Finder website utilizing 2012 data.

The largest minority group outside of African-Americans are Hispanics who make up 5.73% of the total population of Shelby County. Hispanics make up only 0.70% of the Shelby County population 65 and over¹. Only 3.57% of the Shelby County population speaks English "less than very well" and for those 65 or over, only 0.10 % speak English "less than very well." This translates to only 186 persons who fall into the demographic served by the transportation available through Shelby County. These low numbers indicate that Shelby County would fall within the Safe Harbor Provision related to a Limited English Proficiency (LEP) Plan. Nonetheless, Shelby County provides the resources described herein for those who need assistance.

¹ The statistics are drawn from the U.S. Census American Fact Finder website utilizing 2012 data.

2. The frequency with which LEP persons come into contact with the program.

Shelby County 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
Participation in public Meetings	Minimum
Customer service interactions	Minimum
Online submittals from the public via website	Minimum
Contract Drivers	Minimum

The primary purpose of this program is to provide use of a bus by seniors who attend senior centers in Shelby County. Shelby County does not provide transportation on a daily or fee-based basis but on a requested basis for social and recreational purposes. Shelby County does not charge a fare for use of the bus by Shelby County seniors. The fuel for the bus is charged to a County Department. The bus is driven by contract bus drivers. The persons who use the bus to travel to events arranged through senior centers or otherwise will come into direct contact with the driver. The senior centers publicize when transportation by bus is being provided to those interested in participating. In 2014 there were 20 such events. All citizen participation activities are open to the general public.

3. The nature and importance of the program, activity or service provided by the program.

This program does not provide direct assistance to individuals. It does permit seniors from Shelby County who attend senior centers to be able to ride a bus to social and recreational activities without having to lease a bus to attend such events.

4. Resources available and costs to the recipient.

We have contracted with a bilingual speaking person to provide assistance to Spanish speaking residents; a special brochure developed by our staff has been printed and available on our buses for help in understanding the service. The cost is relatively low, the bilingual contractor is not just for the LEP population but some other agencies, as well.

Shelby County has identified five elements that comprise the Shelby's LEP PLAN:

1. Shelby County will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation activities and provide Language Identification Flash Cards on the bus and will post them at senior centers. Shelby County will survey contract drivers and other customer service staff who have direct or indirect contact with LEP individuals. Shelby County will examine 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.

2. Describe how the recipient provides language assistance services by language;

The program covered by this Plan entails Shelby County providing a bus for use by seniors that attend senior centers. The County does not provide transportation daily or on fee-based basis but on a requested basis for social and recreational purposes. The bus driver is a contract driver. A participant who needs assistance with translation of English to Spanish can make a request to the driver or to the director of the senior center whose participants are utilizing the bus service. Shelby County will instruct its contract drivers and directors of its senior centers about the availability of the bi-lingual speaking person to assist Spanish speaking residents. Further, a special brochure developed by Shelby County has been printed and is available on the bus for helping understanding the service.

3. Describe how the recipient provides notices to LEP persons about the availability of language assistance;

A special brochure developed by Shelby County has been printed and is available on the bus used for this program. The brochure describes the service and how to request assistance.

4. Describe how the recipient monitors, evaluates and updates the language access plan;

On an annual basis, Shelby County will poll the contract drivers and inquire about the number of times they have come into contact with a participant who has needed bi-lingual assistance. Further, Shelby County will monitor the use of the bi-lingual services provided and finally Shelby County will review any complaints received in the course of a year regarding the lack of bi-lingual assistance.

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

5. Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP population.

Shelby County has two employees who participate in the oversight of the program. Both are equipped to arrange for language interpretation assistance to those who need it. Shelby County will provide instructions to those who assist at senior centers about the availability of bi-lingual assistance for Spanish speaking persons. Further, Shelby County will have contract bus drivers review the Title VI Plan annually and identify the person to contact if someone needs language assistance.

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

County	Population 6 Years and Older	# Population Speak English less than "Very well"		% Population Speak English less than "Very well"		# Speak Spanish or Creole	% Speak Spanish or Creole	# Speak Other Indo European	% Speak Other Indo European	# Speak Asian-Pacific Island	% Speak Asian-Pacific Island	# Speak Other	% Speak Other
		Less Than Very Well	Very Well	Less Than Very Well	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%		
Autauga	50,376	543	1,10%	333	0,70%	49	0,10%	144	0,30%	17	0,00%		
Baldwin	168,414	4,100	2,40%	2,963	1,80%	445	0,30%	639	0,40%	53	0,00%		
Barbour	25,877	519	0,20%	397	1,50%	26	0,10%	96	0,40%	-	0,00%		
Bibb	21,439	172	0,80%	123	0,60%	-	0,00%	49	0,20%	-	0,00%		
Blount	53,539	2,243	4,20%	2,143	4,00%	77	0,10%	23	0,00%	-	0,00%		
Bullock	10,206	321	3,10%	321	3,10%	-	0,00%	-	0,00%	-	0,00%		
Butler	19,512	111	0,60%	51	0,30%	19	0,10%	41	0,20%	-	0,00%		
Calthoun	110,409	1,902	1,70%	1,516	1,40%	162	0,10%	200	0,20%	24	0,00%		
Chambers	32,366	209	0,60%	138	0,40%	22	0,10%	49	0,20%	-	0,00%		
Cherokee	24,515	67	0,30%	26	0,1%	-	0,00%	23	0,10%	18	0,10%		
Chilton	40,445	1,436	3,60%	1,358	3,40%	16	0,00%	56	0,10%	6	0,00%		
Choctaw	13,178	10	0,10%	10	0,00	-	0,00%	-	0,00%	-	0,00%		
Clarke	24,522	59	0,20%	24	0,10%	-	0,00%	35	0,10%	-	0,00%		
Clay	13,211	255	1,90%	244	1,80%	11	0,10%	-	0,00%	-	0,00%		
Cleburne	13,942	159	1,10%	159	1,10%	-	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%		
Colbert	51,382	640	1,20%	561	1,10%	24	0,00%	55	0,10%	-	0,00%		
Conecuh	12,488	51	0,40%	51	0,40%	-	0,00%	-	0,00%	-	0,00%		
Coosa	10,753	57	0,50%	37	0,30%	20	0,20%	-	0,00%	-	0,00%		
Covington	35,464	418	1,20%	279	0,80%	20	0,10%	119	0,30%	-	0,00%		
Crenshaw	13,085	214	1,60%	108	0,80%	-	0,00%	106	0,80%	-	0,00%		
Cullman	75,324	1,721	2,30%	1,441	1,90%	84	0,10%	193	0,30%	3	0,00%		
Dale	46,237	1,066	2,30%	751	1,60%	51	0,10%	233	0,50%	31	0,10%		
Dallas	40,663	218	0,50%	108	0,30%	94	0,20%	13	0,00%	3	0,00%		
DeKalb	65,522	4,260	6,50%	4,193	6,40%	8	0,00%	4	0,00%	55	0,10%		
Elmore	73,825	1,210	1,60%	897	1,20%	146	0,20%	167	0,20%	-	0,00%		

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%	-	0.10%
Fayette	16,414	87	0.50%	44	0.30%	19	0.10%	24	0.10%	91	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	0.70%	999	0.30%	2,908	0.80%	449	0.10%
Monte	21,752	181	0.80%	153	0.70%	7	0.00%	21	0.10%	-	0.00%
Montgomery	213,095	6,125	2.90%	3,616	1.70%	451	0.20%	1,738	0.80%	320	0.20%
Morgan	110,957	4,869	4.40%	4,463	4.00%	122	0.10%	284	0.30%	-	0.00%
Perry	9,914	105	1.10%	90	0.90%	5	0.10%	10	0.10%	-	0.00%
Pickens	18,564	212	1.10%	201	1.10%	11	0.10%	-	0.00%	-	0.00%
Pike	30,616	672	2.20%	269	0.90%	44	0.10%	359	1.20%	-	0.00%
Randolph	21,500	436	2.00%	403	1.90%	33	0.20%	-	0.00%	-	0.00%
Russell	48,754	424	0.90%	321	0.70%	72	0.10%	31	0.10%	-	0.00%
St. Clair	76,816	972	1.30%	625	0.80%	61	0.10%	286	0.40%	-	0.00%
Shelby	178,619	6,441	3.60%	5,044	2.80%	462	0.30%	892	0.50%	43	0.00%
Sumter	12,946	49	0.40%	8	0.10%	32	0.20%	-	0.00%	9	0.10%
Talladega	77,297	812	1.10%	670	0.90%	20	0.00%	86	0.10%	36	0.00%
Tallapoosa	39,160	590	1.50%	510	1.30%	70	0.20%	10	0.00%	-	0.00%
Tuscaloosa	180,060	4,925	2.70%	3,373	1.90%	428	0.20%	988	0.50%	136	0.10%
Walker	63,292	550	0.90%	489	0.80%	16	0.00%	45	0.10%	-	0.00%
Washington	16,522	58	0.40%	57	0.30%	-	0.00%	1	0.00%	-	0.00%
Wilcox	11,158	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%
Winston	23,323	122	0.50%	94	0.40%	24	0.10%	-	0.00%	4	0.00%