

LEE-RUSSELL COUNCIL OF GOVERNMENTS

TITLE VI PROGRAM

DATE COMPLETED: March 31, 2013
UPDATED: September 2016, September 2019
February 2022, February 2023,
November 7, 2024

**2207 GATEWAY DRIVE
OPELIKA, ALABAMA 36801
334-749-5264
www.lrcog.com**

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

Title VI Policy Statement

The **Lee-Russell Council of Governments** 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 shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin.

Title VI Notice to the Public

The **Lee-Russell Council of Governments** has developed a Title VI Notice to provide information to the public regarding the **Lee-Russell Council of Governments** Title VI obligations and to inform the public of the protections against discrimination afforded to them by Title VI.

The **Lee-Russell Council of Governments** 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 buses, stations, and/or bus stops. The notice is included as Attachment 1.

Title VI Assurances

The **Lee-Russell Council of Governments** fulfills this requirement by submitting its annual Title VI assurances as part of its annual Certification and Assurance submission to ALDOT.

Title VI Complaint Procedures

A Title VI complaint may be filed by any individual or individuals who allege they have been subjected to discrimination or adverse impact under any FTA funded program or activity based on race, color, or national origin.

The **Lee-Russell Council of Governments** has adopted Title VI complaints procedures for investigating and tracking complaints. The Title VI complaint procedures can be found on the agency's website and in Attachment 2.

Title VI Complaint Form

The Title VI Complaint Form is included in Attachment 3.

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

All providers 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.

Since the submission of the last Title VI Program information to the ALDOT, there have been no Title VI investigations, complaints, or lawsuits received by the **Lee-Russell Council of Governments** related to transit. A copy of the Title VI Investigations,

Complaints and Lawsuit Form that will be used if a complaint or lawsuit is filed can be found in Attachment 4.

Public Participation Plan

The **Lee-Russell Council of Governments** is committed to a public participation process that will provide for early and continuous opportunities for participation in the transportation decision making process by everyone including minority, low-income, and the Limited English Proficiency (LEP) population. The Public Participation plan provides for an open exchange of information and ideas between the public and transportation decision makers. The **Lee-Russell Council of Governments** public participation program is ongoing and reviewed regularly in order to identify, meet, and serve the LEP community needs.

In an effort to more fully integrate into community outreach activities, the opinions of minority, low-income and LEP populations, the **Lee-Russell Council of Governments** 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.
- Place public notices on transit website, in the receptionist area, on the buses, and at bus stops.
- Utilize the media (newspaper, radio, television, etc.) to target the minority, low-income and LEP populations in 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.
- Develop Title VI brochures in English and make available in other languages as needed.
- Make public information available in electronically accessible formats.
- Host a table or booth at community event or piggyback an engagement effort onto a regularly scheduled community meeting.
- Utilize interactive and collaborative online technologies, such as social networking, blogs, video sharing and wikis.
- Develop signs, fliers or other materials to mail or to post and distribute to the general public and place in libraries, community centers, etc.
- Consider non-traditional media outlets, such as local, neighborhood publications, or internet outlets, such as YouTube, Twitter, or Facebook.

Summary of public outreach and involvement activities performed (examples)

- **Lee-Russell Council of Governments** staff has 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.
- Utilized the newspapers for publishing meetings and in newspapers that service minorities.
- Staff attends local meetings to identify community needs and participates as a stakeholder agency.
- Staff participates in public outreach efforts to explain specific transit proposals and solicit comments. These outreach efforts include interactions at public open houses.
- Public notices are on the transit website, in the receptionist area, on the buses, and at bus stops.
- Title VI brochures have been developed in English and Spanish.

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 needs of LEP persons.

All subrecipients must address the Four Factor Analysis in the LEP Plan. The Limited English Proficiency Plan can be found in Attachment 5.

- (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 agency.
 - (b) Identification of LEP communities, and assessing 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, 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) Use of bus and rail service;
 - (b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
 - (c) Participation in public meetings;
 - (d) Customer service interactions;
 - (e) Ridership surveys;
 - (f) Operator surveys.
- (3) **The nature and importance of the program, activity, or service provided by the program to people's lives.** Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. An MPO's regional planning activities will impact every person in a region. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. Transit providers, States, and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.
- (4) **The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the 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.

All subrecipients have considerable flexibility in developing a Language Assistance Plan, or LEP Plan. **An LEP Plan shall, at a minimum:**

- (a) Include the results of the Four Factor Analysis, including a description of the LEP population(s) served.
- (b) Describe how the recipient provides language assistance services by language;

- (c) Describe how the recipient provides notice to LEP persons about the availability of language assistance.
- (d) Describe how the recipient monitors, evaluates, and updates the language access plan; and
- (e) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

Safe Harbor Provision

In accordance with the Safe Harbor Provision, the **Lee-Russell Council of Governments** has analyzed which language groups exceed the 1,000 persons or five percent threshold. These language groups are listed in Attachment 5. The **Lee-Russell Council of Governments** provides free translation services.

Minority Representation on Planning and Advisory Bodies

The **Lee-Russell Council of Governments** will not on the grounds of race, color, or national origin 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.

The **Lee-Russell Council of Governments** has transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by **Lee-Russell Council of Governments**. A table depicting the racial breakdown of the membership of these committees can be found in Attachment 6.

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 improve transit services. All committees encourage participation by posting applications and information on the Lee-Russell Council of Governments website regarding the need for additional members.

Guidance on Determining Site or Location of Facilities (Construction)

In the event that the **Lee-Russell Council of Governments** decides to acquire land and/or construct facilities the **Lee-Russell Council of Governments** 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 **Lee-Russell Council of Governments** shall comply with all federal requirements including 49 CFR part 21 and FTA Circular 4702.1B and all subsequent provisions.

A copy of the Title VI Construction Project Analysis that will be used to determine equality impacts can be found in Attachment 7.

Additional Fixed Route Requirements

- The Lee-Russell Council of Governments provides fixed route public transportation services that receive Federal financial assistance and will comply with the requirements in Chapter IV of FTA Circular 4702. 1B dated October 1, 2012.
- The Lee-Russell Council of Governments provides service in a small, urbanized area (UZA) and operates fewer than 50 fixed-route vehicles in peak service. The Lee-Russell Council of Governments has set system-wide standards and policies that can be found in Attachment 8.

Additional Title VI Information

Additional Title VI information is included in Attachment 9.

Board Meeting Resolutions of Approved Title VI Program

The **Lee-Russell Council of Governments** board of directors approved the Title VI program on November 7, 2024. A copy of the **authorizing resolution** is included as Attachment 10.

Attachment 1

Lee-Russell Public Transit (LRPT)/Phenix City Express (PEX) Title VI Notice to Public

The Lee-Russell Public Transit/Phenix City Express hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding Lee-Russell Public Transit/Phenix City Express programs has a right to file a formal complaint with Lee-Russell Public Transit/Phenix City Express. Any such complaint must be in writing and submitted to the Transit Director within one hundred eighty (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

Transit Director
2207 Gateway Drive
Opelika, Alabama 36801
334-749-5264 Ext 240

TÍTULO VI AVISO DE PROTECCIÓN CONTRA LA DISCRIMINACIÓN

Lee-Russell Public Transit (LRPT)/Phenix City Express (PEX) opera sus programas sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier acto ilícito práctica discriminatoria bajo el Título VI puede presentar una queja ante la LRPT/PEX.

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

LRPT/PEX
2207 Gateway Drive
Opelika, Alabama, 36801
334-749-9092
bcoulter@lrcog.com

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

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

Attachment 2

Transit Title VI Complaint Procedures (Notice to the Public provided on request)

During the normal course of providing service to the community, it is possible that passengers and/or members of the public will desire to lodge complaints about the quality of transit service offered or the manner in which transit service is delivered. Every effort will be made to handle these issues quickly, courteously, and fairly. All employees are reminded that everyone in the community has the right to express concerns about transit operations. One should also remember that the mere allegation of impropriety, however, does not establish proof that a violation has occurred. Every effort will be made to address and resolve customer complaints as quickly as possible but certainly within ten days.

Specifically, a "complaint" is an allegation by a member of the public that there has been a specific violation, misinterpretation, or inappropriate act by a member of Lee-Russell Public Transit/Phenix City Express. Vague or general charges of "unfairness" that are not substantiated by facts will not be processed through the dispute resolution system.

All complaints will be referred to the Transit Director, and Lee-Russell Council of Governments for investigation and resolution. Complaints specifically alleging inappropriate behavior by management personnel of Lee-Russell Public Transit/Phenix City Express will be referred to the Executive director of the Lee-Russell Council of Governments. The following steps are established to provide a framework for handling these issues.

Step One – The complaint is received by Lee-Russell Public Transit/Phenix City Express. Sufficient information is collected to allow an investigation and the individual is to be thanked for bringing the matter to the attention of the Lee-Russell Public Transit/Phenix City Express. Upon receiving the complaint, we will neither be defensive nor argumentative.

Step Two – Transit Director of Lee-Russell Council of Governments will investigate the facts, as presented, develop additional facts, identify (where possible) the employee in question and determine what actually occurred.

Step Three – If the complaint has merit, the Transit Director, will counsel the appropriate employee and take the appropriate progressive disciplinary steps.

Step Four – Where applicable, the Transit Director will respond to the individual filing the complaint within fifteen business days. Depending on the desires of the individual and the nature of the complaint, this response may be either a telephone call (sufficiently documented) or a written response.

Step Five – For any egregious complaint, the Transit Director will advise the Executive Director of Lee-Russell Council of Governments. A joint decision may be made to accelerate the disciplinary process or take other extraordinary actions to resolve the complaint.

Step Six – If the member of the public is not satisfied with actions taken locally or if they

demand further action, these unresolved complaints will be referred to the Local Transportation Bureau, ALDOT in Montgomery. We will freely and promptly provide names, telephone numbers and addresses.

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

Step Seven – If the member of the public is not satisfied with actions taken by the state, they may contact the Federal Transit Administration. We will freely and promptly provide names, telephone numbers and addresses.

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

Step Eight – The Transit Director of Lee-Russell Council of Governments 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.

The entire issue of complaint resolution, whether it is one of our employees or a member of the public, is one of courtesy and common sense. We serve the public and they have a right to share their concerns with us. We will handle all complaints courteously and will not allow ourselves to “argue” about the merits of any complaint. In many instances, individuals merely want “to be heard”. We will give them that opportunity.

Procedimientos de Quejas

Una queja del Título VI puede ser presentada por cualquier individuo o individuos que aleguen que han sido objeto de discriminación o impacto adverso bajo cualquier programa o actividad financiado por FTA basado en raza, color u origen nacional. La **Lee-Russell Public Transit (LRPT) / Phenix City Express (PEX)** adoptó los procedimientos de quejas del Título VI para investigar y rastrear las quejas. Se debe presentar un formulario de queja formal, firmado y por escrito del Título VI dentro de los 180 días posteriores a la fecha del presunto acto de discriminación. Los procedimientos de quejas y el formulario de quejas también se publican en el sitio web de la **LRPT/PEX**. Si se necesita información en otro idioma, el denunciante puede comunicarse con (334).

Los formularios de queja completados deben enviarse a:

**Transit Director
LRPT/PEX
2207 Gateway Drive
Opelika, Alabama 36801
(334)749-9092
bcoulter@lrcgo.com**

Una vez recibida la denuncia, la **LRPT/PEX** la revisará para determinar quién tiene jurisdicción. El denunciante recibirá una carta de constancia de recibo informándole si la denuncia será investigada por la oficina de la **LRPT/PEX**. La **LRPT/PEX** solo procesará formularios de queja que estén completos y firmados.

En caso de que el denunciante no pueda presentar una denuncia por escrito, se puede presentar una denuncia verbal de discriminación a la **LRPT/PEX**. En estas circunstancias, se entrevistará al denunciante y la **LRPT/PEX** ayudará al denunciante a convertir las alegaciones verbales en una denuncia formal por escrito.

La **LRPT/PEX** tiene 15 días hábiles para investigar la denuncia. Si se necesita más información para resolver el caso, la **LRPT/PEX** puede comunicarse con el denunciante. El denunciante tiene 15 días hábiles a partir de la fecha de esta carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no recibe la información adicional del denunciante dentro de los 15 días hábiles, la **LRPT/PEX** puede cerrar administrativamente el caso. Un caso también se puede cerrar administrativamente si el denunciante ya no desea continuar con el caso.

Después de que el investigador revise la denuncia, emitirá una de dos cartas al denunciante: una carta de cierre o una carta de hallazgo (LOF por sus siglas en inglés). Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Una LOF resume las alegaciones y las entrevistas con respecto al presunto incidente y explica si se tomará alguna acción disciplinaria, capacitación adicional del miembro del personal acusado u otra acción. Si el denunciante desea apelar la decisión, tiene 15 días después de la fecha de la carta de cierre o LOF para presentar una carta de apelación a la **LRPT/PEX**.

Si el denunciante no está satisfecho con las acciones tomadas localmente o si exige una acción adicional, la denuncia se remitirá a:

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

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito:

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

Attachment 3

Title VI Complaint Form

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

Section IV		

Have you previously filed a Title VI complaint with this agency? Circle	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

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

Signature and date required below

Signature

Date

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

**Transit Director
Lee-Russell Council of Governments
2207 Gateway Drive
Opelika, Alabama 36801**

Formulario de queja del Título VI

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

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

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

Firma y fecha requeridas a continuación:

Firma

Fecha

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

TRANSIT DIRECTOR
LEE-RUSSELL PUBLIC TRANSIT(LRPT)PHENIX CITY EXPRESS(PEX)
2207 GATEWAY DRIVE
OPELIKA, ALABAMA 36801
BCOULTER@LRCOG.COM

Attachment 4

List of Transit-Related Investigations, Lawsuits and Complaints

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

Since the submission of the last Title VI Program information to the ALDOT, there have been no Title VI investigations, complaints, or lawsuits received by the Lee-Russell Council of Governments related to transit.

Attachment 5

LIMITED ENGLISH PROFICIENCY ASSESSMENT

Provider: Lee-Russell Council				
Date Completed: August 2019				
<p>1. Examine Census Data at http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t</p> <p>1) Select <i>TOPICS – PEOPLE - LANGUAGE – ENGLISH USAGE</i></p> <p>2) Select <i>GEOGRAPHIES –CENSUS TRACT</i></p> <p>3) Select the <i>STATE</i> from the drop-down menu</p> <p>4) Select the <i>COUNTY</i> from the drop-down menu</p> <p>5) Click on <i>ALL CENSUS TRACTS WITHIN . . . COUNTY</i></p> <p>6) Click <i>ADD TO YOUR SELECTIONS</i></p> <p>7) From the <i>SELECTION RESULTS</i> on the right side of the screen, check the box for the table <i>B16001 - LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER</i></p> <p>8) The table will present a breakdown of the languages spoken in Lee and Russell County population estimate that speaks the language and their ability to speak English or speak English less than “very well”.</p> <p>9) Add up all geographically the population estimates that speak English less than “very well”.</p>				
City/County	Population	Population that Speaks English Less than Very Well (Number)	Population that Speaks English Less than Very Well (as Percent of Total Population)	Language/Languages Spoken by “Speak English Less Than Very Well” Population
Lee County	153,960	4450	2.9	Spanish, Indo-European, Asian & Pacific Island, and other languages
Russell County	53,882	824	1.5	Spanish, Indo-European, Asian & Pacific Island languages
Total	207,842	5274	2.5	
1. Survey your drivers. Do they indicate that there is a need for language assistance for riders?		None needed so far		

If so, which languages?	
2. Survey your receptionist, customer service representative, and schedule/dispatcher. Do they indicate that there is a need for language assistance for riders? If so, which languages?	Usually either speak English slow enough for us to understand, or use the translation services of Auburn University.
3. Contact major employers. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Employer	Response
Auburn University	Provides translation services
Mando	Provides translation services for Korean Employees
Pharmavite	None needed
4. Contact human service agencies. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Agency	Response
Lee County DHR	Not Needed, Translation services are provided their clients
Russell County DHR	They will make reservations for clients if needed
5. Contact local towns and cities, including the police departments. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Town/City/Department	Response
City of Opelika	Not Needed
City of Auburn	Not Needed
City of Phenix City	Not Needed
Lee County Commissioners	Not Needed
Russell County Commissioners	Not Needed

6. Contact the local school systems. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
School System	Response
Opelika	Not Needed
Auburn	Not Needed
Lee County	Not Needed
Russell County	Not Needed
Phenix City	Not Needed
7. Contact the local churches. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Church	Response
St. Mary's Catholic Church, Opelika	Priest speaks fluent Spanish & translates for community
St Michael Catholic Church, Auburn	Not needed, most Spanish speakers go to Opelika
8. Inventory second languages spoken by staff.	Spanish
9. Do the responses indicate a need for language assistance for potential transit users? If so, which languages? If yes, please prepare and submit an LEP plan.	No

Limited English Proficiency (LEP) Interactions Staff Survey

Individuals with Limited English Proficiency do not speak English as their primary language, have a limited ability to read, speak, write or understand English or are native English speakers with low levels of literacy.

1) In the past six months have you encountered a Limited English Proficiency (LEP) person in your work activities?

2) What language have you encountered in the past six months?

3) How many times have you encountered a LEP person speaking (language selected in Question 2) in the past six months?

4) What type of work activity were you involved in when you encountered this language?

Choose all that apply

- ◆ Outreach/Public Meeting
- ◆ E-mail
- ◆ Phone Call
- ◆ Other, please specify

5) Have you encountered additional languages in the past six months?

State of Alabama and All Counties within Alabama

Language Spoken at Home

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

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

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

LEE-RUSSELL COUNCIL OF GOVERNMENTS

Limited English Proficiency (LEP) Plan

Introduction

This Limited English Proficiency Plan (LEP) has been prepared to address **Lee-Russell Council of Governments'** 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

Lee-Russell Council of Governments has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access transit services provided by the **Lee-Russell Council of Governments**. 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 to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the **Lee-Russell Council of Governments** undertook the U.S. DOT four-factor LEP 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 **Lee-Russell Council of Governments** program, activity or service.
2. The frequency with which the LEP persons come in contact with **Lee-Russell Council of Governments** programs activities or services.
3. The nature and importance of programs, activities or services provided by **Lee-Russell Council of Governments** to the LEP population.
4. The resources available to **Lee-Russell Council of Governments** and 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 **Lee-Russell Council of Governments** program, activity or service.*

The Lee County Commission utilized the most recent American Community Survey 5-year estimates, Table S1601, for 2015-2020 for Lee and Russell Counties. Based on this data, the following language groups meet the 1,000 or 5% LEP persons threshold : Spanish and Asian & Pacific Island languages.

The total population for Lee and Russel Counties is 207,842. Of those persons, 5,274 (2.5%) reported speaking English less than very well.

1,686 people speak Spanish and speak English less than very well.

381 people speak Indo-European languages and speak English less than very well.

3,106 people speak Asian & Pacific Island languages and speak English less than very well.

The most popular languages spoken at home (other than English) are Spanish and Asian & Pacific Island languages. The **Lee-Russell Council of Governments** will likely encounter more LEP persons speaking these languages that benefit from the transit programs than any other LEP persons.

2. The frequency with which the LEP persons come in contact with Lee-Russell Council of Governments programs, activities or services.

Lee-Russell Council of Governments assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following touch points and frequencies have been identified:

CONTACT POINTS	FREQUENCY
Bus Drivers – Fixed Route	low
Bus Drivers - Demand Response	low
Information Line	low
Dispatchers	low
Reservationist	low
Web Site	low
Receptionist	very low

3. The nature and importance of programs, activities or services provided by Lee-Russell Council of Governments to the LEP population.

The Lee-Russell Public Transit System can improve people's lives by giving them the option of mobility, giving them the freedom to go anywhere they would like. Lee-Russell Transit provides a cheap or even free alternative to the costs of owning or driving a personal vehicle. Providing the option of public transit can offer options for people to be able to get out of isolation and go visit friends and family or give them the option to be able to get back and forth for employment opportunities.

The largest geographic concentration of LEP individuals in the **Lee-Russell Council of Governments** service area speak Spanish and Asian & Pacific Island languages. Services provided by the **Lee-Russell Council of Governments** that are most likely to encounter LEP individuals are the fixed route system which serves the general public and the demand response system.

4. The resources available to Lee-Russell Council of Governments and overall cost to provide LEP assistance.

The **Lee-Russell Council of Governments** assessed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise, and taking an inventory of available organizations that the **Lee-Russell Council of Governments** could partner with for outreach and translation efforts. Bilingual staff, volunteer community agencies, web based translation services are resources that can assist in reducing the cost of translation services. Auburn University has staff that could provide assistance. Furthermore, many of

the common forms used in the implementation of transit are available in multiple languages on federal websites.

Limited English Proficiency (LEP) Plan Outline

There are five (5) areas that comprise the **Lee-Russell Council of Governments** LEP PLAN:

1. Identifying LEP individuals who need language assistance
2. Providing Language assistance Measures
3. Training Staff
4. Providing Notice to LEP persons
5. Monitoring and Updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How the **Lee-Russell Council of Governments** may identify an LEP person who needs language assistance:

- Examine customer service records for language assistance that has been received in the past, either at meetings or over the phone, to be determined whether language assistance might be needed for future events;
- As needed survey drivers and other first line staff that have direct or indirect contact with LEP individuals.
- When **Lee-Russell Council of Governments** sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation, it is possible to informally gauge each attendee's ability to speak and understand English.
- Provide Language Identification Flash Cards at public meetings.

2. Language Assistance Measures

How the **Lee-Russell Council of Governments** will assist LEP person who needs language assistance:

- Network with local human service organizations that provide service to LEP individuals and seek opportunities to provide information on **Lee-Russell Council of Governments** programs and services;
- Implement a Hispanic Education and Outreach program;
- Post **Lee-Russell Council of Governments** Title VI Notice, Complaint Procedures, Complaint Form, and LEP Plan on the agency website;
- Provide travel training to LEP persons;
- Identify in-house staff with other language abilities to assist with translation services;
- Public notice, publications, and other printed material, including webpage content, may be made available in other languages.
- Provide a bilingual Community Outreach Coordinator at community events and public hearings;

- Placement of statements in notices and publications that interpreter services are available for meetings, with a seven day advance notice free of charge in other languages;
- Provide Language Identification Flash Cards onboard the **Lee-Russell Council of Governments** fleet, in Field Supervisor vehicles and at the Administrative Office;
- Provide language for LEP persons in Route Guides;
- Utilize a web-based translation service application such as Google Translate
<http://translate.google.com/> ;
- Utilize telephone translation services

3. Staff Training

How the **Lee-Russell Council of Governments** will train staff on its role and responsibilities in providing meaningful access to services for LEP persons:

- Find educational materials and train staff on the Title VI requirements for providing meaningful access to services for LEP persons;
- Provide staff with a description of language assistance services offered by the **Lee-Russell Council of Governments**
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI / LEP complaint;
- Instruct staff on the use of Language Identification Flash Cards

4. Providing Notice to LEP Persons

How the **Lee-Russell Council of Governments** will provide Notice to LEP persons, both oral and written communications:

- Offer general information, such as operation hours, fares, etc., on the **Lee-Russell Council of Governments** customer service line in multiple languages.
- Implement the use of an automated greeting in both Spanish and English, directing callers to select which language they prefer.

PROVIDE THE FOLLOWING WRITTEN COMMUNICATIONS IN BOTH ENGLISH AND Spanish

- Introduction section of the **Lee-Russell Council of Governments** Route Guides which contains information on fares, accessibility, fare / ticket discount information and general riding information;
- Temporary signs at bus stops and transit centers informing customers of any detours and route changes;

- Onboard flyers containing information about route changes, rider alerts, fare increases and public hearings;
- Interior bus signage at transit center that display safety or system policy information;
- Interior bus signage displaying cash fare cost of monthly discount passes and special promotions / campaigns.
- 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 need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services.

Lee-Russell Council of Governments will update the LEP as required by 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, or when clear and higher concentrations of LEP individuals are present in the **Lee-Russell Council of Governments** service area and/or during the process of updating Title VI Program.

How the Lee-Russell Council of Governments will examine and update its LEP PLAN:

- Determine how the needs of LEP persons have been addressed;
- Determine the current LEP population in the service area and whether the need for translation services has changed;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether transit systems financial resources are sufficient to fund language assistance resources needed;
- Determine whether the **Lee-Russell Council of Governments** has fully complied with the goals of the LEP Plan
- Determine whether complaints have been received concerning the company's failure to meet the needs of the LEP individuals.

Dissemination of the Lee-Russell Council of Governments LEP Plan

How the LEP Plan will be disseminated to customers and the community:

- The LEP Plan and the Title VI Plan will be available at the **Lee-Russell Council of Governments** Transit Department, therefore; any person or agency with internet access will be able to access and download the plan. Alternatively, any person or agency may also request a copy of the plan via telephone, fax, and mail or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request that plans are translated in various languages which the **Lee-Russell Council of Governments** will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the **Lee-Russell Council of Governments** at the following: Transit Director, 2207 Gateway Drive, Opelika, AL 36801, 334-749-9092.

Attachment 6

Table Depicting Minority Representation on Planning and Advisory Bodies

Body	Caucasian	Latino	African American	Asian American	Native American
Population	72%	3.7	24	4.2	.08
Name of Committee BOARD	70%		30%		
Name of Committee					
Name of Committee					

Attachment 7

ALABAMA DEPARTMENT OF TRANSPORTATION 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.

Attachment 8

Additional Fixed Route Requirements

Vehicle Load Standards

The average of all loads during the peak operating period does not exceed vehicles' achievable capacities, which are 25 passengers for our 25 pass standard buses.

Vehicle Headway Standards

Service operates on Urban Radial lines every 60 minutes or better from 8am to 4pm, 5 days a week. On weekdays, 60 minute or better service should begin no later than 8:00 a.m. and continue until 4:00 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the *Regional Transportation Plan*, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-Time Performance Standards

Ninety-five (95) percent of the Lee-Russell Council of Governments transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.

Vehicle Assignment Policy

Vehicles will be assigned to the South and North Routes such that the average age of the fleet serving each depot does not exceed "5" years announcement systems.

Service Availability Standards

Service availability is a general measure of the distribution of routes or stops within a transit provider's service area. These standards serve as inputs or considerations taken into account to make decisions about service productivity to make sure routes are serving citizens to the maximum efficiency. These services could vary by the local population density or the local businesses in any given area. Routes are set up to best accommodate the public for residential and commercial areas.

Transit Amenities Policy

Transit amenities refer to items of comfort, convenience, and safety that are available to the public. LRPT/PEX does have priority seating signs on every bus for the first available row of seating closest to the passengers door. LRPT/PEX buses are equipped with wheelchair lifts in order to be able to offer transportation to anyone who may need access to public transit. The PEX system has a fixed route system with a supplemental demand response available to anyone who can not access the fixed route stops easily.

Attachment 9

Additional Title VI Information

All subrecipients must address each of the following:

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

None

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

None

3. Is your agency considered a minority organization: ____Yes XXNo

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

____ Black American
____ Hispanic American
____ Native American

____ Sub-Continent Asian-American
____ Asian-Pacific American
____ Other

4. Does your agency provide transportation services to minority communities?
XYes ____ No

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

X Black American
X Hispanic American
____ Native American

X Sub-Continent Asian-American
X Asian-Pacific American
X Other

5. List the date of the most recent signing of the Annual Certification and Assurances.

6. 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.

No

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

No

If yes, please complete the following items:

- a. Provide a brief description of these projects/service changes.
- b. What did you do to ensure that populations affected by the project and/or service change had meaningful access to and involvement in the development process?
- c. What is the number of percentage of LEP or EJ populations affected by the project and/or service change?

ALDOT/FTA may request at its discretion, information other than that required by the FTA Circular: FTA C 4702.1B, from a subrecipient in order for ALDOT/FTA to investigate complaints of discrimination or resolve concerns about possible noncompliance with DOT Title VI regulations.

Attachment 10

**Authorizing resolution will be approved on
November 7, 2024.**



August 12, 2024

Mr. Bradley B. Lindsey, P.E.
State Local Transportation Engineer
Bureau of Local Transportation
1409 Coliseum Boulevard. Admin 110
Montgomery, Alabama 36110

Dear Mr. Lindsey:

Lee-Russell Council Of Governments 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 which prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

The Lee-Russell Council of Governments ensures compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, part 21, and related statutes and regulations by developing and approving the Lee-Russell Council of Governments Title VI Plan. We will formally approve the 2024 Title VI Plan at our next Board of Directors meeting on November 7, 2024.

Until we can have the plan approved by the Board of Directors, I approve the submitted Title VI Program on behalf of our agency in order to be in compliance with the Title VI federal requirements and the Transit Director, in his/her capacity, will serve as the Title VI officer and is authorized to revise and update the plan, as necessary.

Sincerely,

Lisa Sandt

Lisa Sandt
Executive Director

Mayor Gary Fuller, Chairman **Lisa Sandt**, Executive Director

2207 Gateway Drive • Opelika, Alabama 36801-6834 • 334.749.5264 • Fax 334.749.6582 • www.lrcog.com