Volunteers of America Southeast, Inc.

TITLE VI PROGRAM

Approval Dates:
December 2, 2014
Revised June 7, 2018

1204 Hillcrest Road
Mobile, AL  36695
251-300-3500
www.voasoutheast.org

This document was prepared in accordance with the FTA Circular 4702.1B, dated October 1, 2012.
## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Policy Statement</td>
<td>1</td>
</tr>
<tr>
<td>II. Notice to the Public</td>
<td>1</td>
</tr>
<tr>
<td>III. Complaint Procedures and Form</td>
<td>1</td>
</tr>
<tr>
<td>IV. Transit-Related Investigations, Complaints, and Lawsuits</td>
<td>3</td>
</tr>
<tr>
<td>V. Public Participation Plan</td>
<td>3</td>
</tr>
<tr>
<td>VI. Limited English Proficient Plan</td>
<td>4</td>
</tr>
<tr>
<td>VII. Minority Representation on Planning and Advisory Bodies</td>
<td>6</td>
</tr>
<tr>
<td>VIII. Guidance on Determining Site or Location of Facilities</td>
<td>6</td>
</tr>
<tr>
<td>IX. Additional Title VI Information</td>
<td>7</td>
</tr>
<tr>
<td>X. Board Meeting Resolution of Approved Title VI Program</td>
<td>7</td>
</tr>
</tbody>
</table>

## APPENDICES

<table>
<thead>
<tr>
<th>Appendix</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix A – Title VI Notice to the Public</td>
<td>8</td>
</tr>
<tr>
<td>Appendix B – Title VI Complaint Form</td>
<td>9</td>
</tr>
<tr>
<td>Appendix C – List of Transit-Related Investigations, Complaints, and Lawsuits</td>
<td>11</td>
</tr>
<tr>
<td>Appendix D – Limited English Proficiency Plan</td>
<td>14</td>
</tr>
<tr>
<td>Appendix E – Table Depicting Minority Representation on Planning and Advisory Bodies</td>
<td>21</td>
</tr>
<tr>
<td>Appendix F – Title VI Construction Project Analysis</td>
<td>22</td>
</tr>
<tr>
<td>Appendix G – Additional Title VI Information</td>
<td>25</td>
</tr>
<tr>
<td>Appendix H – Documentation of Title VI Authorization</td>
<td>27</td>
</tr>
</tbody>
</table>
I. Policy Statement

Volunteers of America Southeast ensures compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, Part 21, and related statutes and regulations to the end that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d) including the denial of meaning access for Limited English Proficient (LEP) persons.

The purpose of this plan is to assist Volunteers of America Southeast in its administration and management of Title VI related activities. Volunteers of America Southeast’s Title VI Coordinator is DeAnna Ferguson, Vice President of Services. She can be contacted at (251) 300-3500 and/or deanna@voase.org.

II. Notice to the Public

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

Volunteers of America Southeast has posted the Title VI Notice on the agency’s website and in public areas of the agency’s offices including the receptionist area and meeting rooms. This notice is also posted in all transit vehicles. This notice will be translated into languages other than English as needed. A copy of the notice is included as Appendix A.

III. Complaint Procedures and Form

A Title VI complaint may be filed by any individual or individuals who allege that he or she has been subjected to discrimination or adverse impact under any FTA funded program or activity based on race, color, or national origin. Volunteers of America Southeast has adopted Title VI complaint procedures for investigating and tracking complaints. A formal, signed, written Title VI complaint form must be filed within 180 days of the date of the alleged act of discrimination. A copy of the complaint form is included in Appendix B. The complaint procedures and complaint form are also posted on Volunteers of America Southeast’s website*. Completed forms should be submitted to:
DeAnna Ferguson  
Vice President of Services  
Volunteers of America Southeast  
1204 Hillcrest Road  
Mobile, AL 36693  
(251) 300-3500  
(251)666-2836 (fax)  
deanna@voase.org

Once the complaint is received, Volunteers of America Southeast will review it to determine who has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by Volunteers of America Southeast’s office. Volunteers of America Southeast will only process complaint forms that are complete.

In a situation where the complainant is unable or incapable of providing a written complaint, a verbal complaint of discrimination may be made to Volunteers of America Southeast. Under these circumstances, the complainant will be interviewed and Volunteers of America Southeast will assist the complainant in converting the verbal allegations to a formal written complaint.

Volunteers of America Southeast has 15 business days to investigate the complaint. If more information is needed to resolve the case, Volunteers of America Southeast may contact the complainant. The complainant has 15 business days from the date of this letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, Volunteers of America Southeast can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the accused staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the closure letter or the LOF to do so.

If the complainant is not satisfied with actions taken locally or if they demand further action, the complaint will be referred to Mr. Wiley Brooks, Alabama Department of Transportation, Bureau of Local Transportation, 1100 John Overton Drive, Montgomery, Alabama 36110.

A person may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

*If information is needed in another language, complainant can contact 251-300-3500.
IV. Transit-Related Investigations, Complaints, and Lawsuits

Volunteers of America Southeast 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 Volunteers of America Southeast. A copy of the Title VI Transit Investigations, Complaints, and Lawsuits Form that will be used if a complaint or lawsuit is filed can be found in Appendix C.

V. Public Participation Plan

Volunteers of America Southeast 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. Volunteers of America Southeast’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, Volunteers of America Southeast’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.
- Provide opportunities for public participation through means other than written communication, such as personal interviews or the use of recording devices to capture oral comments.
- Hold public meetings in locations, facilities, and at meeting times that are convenient and accessible to the minority, low-income, and LEP populations.
• Ensure that the decision-making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.

• Develop Title VI brochures in English and other languages as needed.

• Make public information available in electronically accessible formats.

• Host a table or booth at community events or piggyback engagement efforts onto regularly-scheduled community meetings.

• Consider non-traditional media outlets such as local neighborhood publications or internet outlets such as YouTube, Twitter, or Facebook.

To date, Volunteers of America Southeast has participated in the following public outreach and involvement activities:

• Volunteers of America Southeast staff members have participated in and supported Community-Based Transportation Programs for disadvantaged communities.

• Volunteers of America Southeast staff members have attended local meetings to identify community needs and to participate as a stakeholder agency.

• Volunteers of America Southeast staff members have participated in public outreach efforts to explain specific transit proposals and to solicit comments. These outreach efforts include interactions at public open houses.

• Volunteers of America Southeast staff have provided comment on past and current plans related to transportation programs.

VI. Limited English Proficient Plan

The Four Factor Analysis is used to identify Limited English Proficient (LEP) persons who need language assistance, outline how language assistance is provided, and describe how Volunteers of America Southeast considers the needs of LEP persons. This assessment balances the following four factors:

A. The number or proportion of LEP persons eligible to be served or likely to be encountered by Volunteers of America Southeast’s program. In addition to the number or proportion of LEP persons served, the analysis identified:

1. How LEP persons interact with Volunteers of America Southeast;

2. Where LEP communities are located and the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
3. The literacy skills of LEP populations in their native languages to determine whether document translation will be an effective practice; and

4. Whether (or not) LEP persons are underserved by Volunteers of America Southeast due to language barriers.

B. The frequency with which LEP persons come into contact with the program. The following contact points and frequencies have been identified

1. Bus Drivers
2. Website
3. Receptionist

C. The nature and importance of Volunteers of America Southeast's program to people's lives.

D. The resources available for LEP outreach and the costs associated with that outreach.

Volunteers of America Southeast has developed a Limited English Proficiency Plan which is located in Appendix D. It includes:

- Results of the Four Factor Analysis, including a description of the LEP population(s) served;
- A description of how language assistance services will be provided;
- The methods used by Volunteers of America Southeast to provide language assistance services;
- A description of how employees are trained to provide timely and reasonable language assistance to LEP populations;
- A description of how notice is provided to LEP persons about the availability of language assistance; and
- An explanation of how the plan is monitored, evaluated, and updated.

Safe Harbor Provision

In accordance with the Safe Harbor Provision, Volunteers of America Southeast has identified that no language groups exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be served by the program. Volunteers of America Southeast also provides free translation services upon request.

VII. Minority Representation on Planning and Advisory Bodies
Volunteers of America Southeast will not deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program on the grounds of race, color, or national origin.

Volunteers of America Southeast does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by Volunteers of America Southeast. If Volunteers of America Southeast establishes such boards or committees, a table will be used to depict the racial breakdown of the membership of those committees and will be included in future Title VI programs (see Appendix E for a sample table). In addition, a description of efforts made to encourage the participation of minorities on such committees will be included.

VIII. Guidance on Determining Site or Location of Facilities

Volunteers of America Southeast has no construction projects scheduled. In the event that Volunteers of America Southeast decides to acquire land and/or construct facilities, Volunteers of America Southeast 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. Volunteers of America Southeast shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

Volunteers of America Southeast 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, Volunteers of America Southeast will engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis will compare the equity impacts of various alternatives and will occur before the selection of preferred sites. A copy of the Title VI Construction Project Analysis can be found in Appendix F.

IX. Additional Title VI Information

Additional Title VI information is included in Appendix G.
X. Board Meeting Resolution of Approved Title VI Program

Volunteers of America Southeast Board of Directors approved the Title VI program originally on December 2, 2014 and approved revision on June 7, 2018. A copy of the Authorizing Resolution is included as Appendix H.
Appendix A

Title VI Notice to the Public

TITLE VI NOTICE OF PROTECTION AGAINST DISCRIMINATION

Volunteers of America Southeast operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Volunteers of America Southeast.

For more information on the civil rights program and the procedures to file a complaint, contact:
Volunteers of America Southeast
1204 Hillcrest Rd
Mobile, AL 36695
251-300-3500
www.voasoutheast.org

A complaint may be filed directly with the Federal Transit Administration by contacting:
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington DC 20590

If information is needed in another language, then contact 251-300-3500.
Appendix B
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:

Section III
I believe the discrimination I experienced was based on (check all that apply):
[] Race       [] Color       [] 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

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

Section V
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

[ ] Yes [ ] No

If yes, check all that apply:

[ ] Federal Agency: ____________________

[ ] Federal Court _____________________ [ ] State Agency __________

[ ] State Court _______________________ [ ] Local Agency __________

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

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:

Deanna Ferguson
Volunteers of America Southeast
1204 Hillcrest Road
Mobile, AL 36695
Appendix C

List of Transit-Related Investigations, Complaints, and Lawsuits

<table>
<thead>
<tr>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, or national origin)</th>
<th>Status Pending or Closed</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
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<tr>
<td>2.</td>
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<td></td>
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<tr>
<td>Complaints</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
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<tr>
<td>2.</td>
<td></td>
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<td></td>
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<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
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</tbody>
</table>
# Appendix D

## Demographics

**State of Alabama**

**Language Spoken At Home per County**

Speak English less than "very well"

Based on Census 2010 Data and

2007-2011 American Community Survey

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<td>State of Alabama</td>
<td>4,443,763</td>
<td>105,317</td>
<td>2.40%</td>
<td>76,394</td>
<td>1.90%</td>
<td>7,446</td>
<td>0.20%</td>
<td>17,119</td>
<td>0.40%</td>
<td>2,358</td>
<td>0.10%</td>
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<tr>
<td>County</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Autauga</td>
<td>50,376</td>
<td>543</td>
<td>1.10%</td>
<td>333</td>
<td>0.70%</td>
<td>49</td>
<td>0.10%</td>
<td>144</td>
<td>0.30%</td>
<td>17</td>
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<tr>
<td>Baldwin</td>
<td>168,414</td>
<td>4,100</td>
<td>2.40%</td>
<td>2,963</td>
<td>1.80%</td>
<td>445</td>
<td>0.20%</td>
<td>639</td>
<td>0.40%</td>
<td>53</td>
<td>0.00%</td>
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<td>-</td>
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<td>Bibb</td>
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<td>172</td>
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<td>123</td>
<td>0.80%</td>
<td>-</td>
<td>0.00%</td>
<td>40</td>
<td>0.20%</td>
<td>-</td>
<td>0.00%</td>
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<tr>
<td>Blount</td>
<td>53,539</td>
<td>2,243</td>
<td>4.20%</td>
<td>2,143</td>
<td>4.00%</td>
<td>77</td>
<td>0.10%</td>
<td>23</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<tr>
<td>Bullock</td>
<td>10,206</td>
<td>321</td>
<td>3.10%</td>
<td>321</td>
<td>3.10%</td>
<td>-</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<td></td>
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<tr>
<td>Butler</td>
<td>19,612</td>
<td>111</td>
<td>0.60%</td>
<td>51</td>
<td>0.30%</td>
<td>19</td>
<td>0.10%</td>
<td>41</td>
<td>0.20%</td>
<td>-</td>
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<td>Calhoun</td>
<td>110,469</td>
<td>1,902</td>
<td>1.70%</td>
<td>1,516</td>
<td>1.40%</td>
<td>162</td>
<td>0.10%</td>
<td>200</td>
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<td>Chambers</td>
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<td>209</td>
<td>0.60%</td>
<td>138</td>
<td>0.40%</td>
<td>22</td>
<td>0.10%</td>
<td>49</td>
<td>0.20%</td>
<td>-</td>
<td>0.00%</td>
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<td>Cherokee</td>
<td>24,515</td>
<td>67</td>
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<td>26</td>
<td>0.1%</td>
<td>-</td>
<td>0.00%</td>
<td>23</td>
<td>0.10%</td>
<td>18</td>
<td>0.10%</td>
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<td>Chilton</td>
<td>40,445</td>
<td>1,436</td>
<td>3.60%</td>
<td>1,358</td>
<td>3.40%</td>
<td>16</td>
<td>0.00%</td>
<td>56</td>
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<td>0.0%</td>
<td>-</td>
<td>0.00%</td>
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<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<td>Cleburne</td>
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<td>159</td>
<td>1.10%</td>
<td>159</td>
<td>1.10%</td>
<td>-</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<td>Coffee</td>
<td>45,929</td>
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<td>1,051</td>
<td>2.30%</td>
<td>59</td>
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<td>293</td>
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<td>-</td>
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<td>561</td>
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<td>24</td>
<td>0.00%</td>
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<td>Conecuh</td>
<td>12,488</td>
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<td>0.40%</td>
<td>-</td>
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<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<tr>
<td>Coosa</td>
<td>10,753</td>
<td>57</td>
<td>0.50%</td>
<td>37</td>
<td>0.30%</td>
<td>20</td>
<td>0.20%</td>
<td>-</td>
<td>0.00%</td>
<td>-</td>
<td>0.00%</td>
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<tr>
<td>Covington</td>
<td>35,464</td>
<td>418</td>
<td>1.20%</td>
<td>279</td>
<td>0.80%</td>
<td>20</td>
<td>0.10%</td>
<td>119</td>
<td>0.30%</td>
<td>-</td>
<td>0.00%</td>
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<tr>
<td>Crenshaw</td>
<td>13,085</td>
<td>214</td>
<td>1.60%</td>
<td>106</td>
<td>0.80%</td>
<td>-</td>
<td>0.00%</td>
<td>106</td>
<td>0.80%</td>
<td>-</td>
<td>0.00%</td>
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LIMITED ENGLISH PROFICIENCY (LEP) PLAN

1204 Hillcrest Road
Mobile, AL 36695
251-300-3500
www.voasoutheast.org
Introduction

This Limited English Proficiency Plan (LEP) has been prepared to address Volunteers of America Southeast’s responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, et seq. and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Plan Summary

Volunteers of America Southeast has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access transit services provided by Volunteers of America Southeast. 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 Volunteers of America Southeast identifies a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how LEP persons are notified that assistance is available.

In order to prepare this plan, Volunteers of America Southeast undertook the U.S. DOT Four Factor Analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Volunteers of America Southeast program, activity, or service.

2. The frequency with which LEP persons come into contact with Volunteers of America Southeast's programs, activities, or services.

3. The nature and importance of programs, activities, or services provided by Volunteers of America Southeast to the LEP population.

4. The resources available to Volunteers of America Southeast and the overall cost to provide LEP assistance.
Four Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Volunteers of America Southeast program, activity, or service.

Volunteers of America Southeast reviewed the 2010 U.S. Census Report and determined that the total population for Mobile County is 382,340 and 8,167 persons (2.10%) residents report speaking English less than very well. Other languages speakers who classify as not very well include Spanish/ Spanish Creole .10%, Indo European .30%, Pacific Islander .80%, speak another language is .10%. The most popular language spoken at home (other than English) is Spanish. According to 2010 U.S. Census Report Data for Montgomery County shows a total population of 213,095 and 6,125 (2.90%) residents report speaking English less than very well. Other languages speakers who classify as not very well include Spanish/Spanish Creole 1.70%, Indo European .20%, Pacific Islander .80%, speak another language is .20%. Volunteers of America Southeast will likely encounter more Spanish speaking persons that benefit from the transit programs than any other LEP persons. Volunteers of America Southeast reviewed the 2010 U.S. Census Report and determined that the total population for Escambia County is 35,700 and 178 persons (0.50%) residents report speaking English less than very well. Other languages speakers who classify as not very well include Spanish/Spanish Creole .40%, and Indo European .10%. Volunteers of America Southeast reviewed the 2010 U.S. Census Report and determined that the total population for Baldwin County is 168,414 and 4,100 persons (2.40%) residents report speaking English less than very well. Other languages speakers who classify as not very well include Spanish/Spanish Creole 1.80%, Indo European .30%, Pacific Islander .40%. Volunteers of America Southeast will likely encounter more Spanish speaking persons that benefit from the transit programs than any other LEP persons.

2. The frequency with which LEP persons come into contact with Volunteers of America Southeast’s programs, activities, or services.

Volunteers of America Southeast 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:

<table>
<thead>
<tr>
<th>CONTACT POINTS</th>
<th>FREQUENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bus Drivers</td>
<td>Minimum</td>
</tr>
<tr>
<td>Web Site</td>
<td>Minimum</td>
</tr>
<tr>
<td>Receptionist</td>
<td>Minimum</td>
</tr>
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3. The nature and importance of programs, activities, or services provided by Volunteers of America Southeast to the LEP population.

Our program serves individuals within our programs, with clientele limited to seniors, individuals with developmental disabilities and comorbid physical disabilities. We
currently operate nine vehicles in our service area of Mobile and Montgomery. Residents in our supported living developments are our ridership.

The largest geographic concentration of LEP individuals in Volunteers of America Southeast’s service area are Spanish speaking residents. These residents are rarely dependent upon our specialized transportation services. It is also likely that Volunteers of America Southeast will encounter LEP individuals at the South Mobile County at community outreach events.

4. **The resources available to Volunteers of America Southeast and the overall cost to provide LEP assistance.**

Volunteers of America Southeast assessed its resources and determined that funds are available within the current budget for providing LEP assistance. Volunteers of America Southeast also determined which documents would be most beneficial if translated into other languages and the cost associated with this effort. An inventory of available organizations with which Volunteers of America Southeast could partner for outreach and translation efforts was also identified. In addition, bilingual staff, volunteer community agencies, and web based translation services were identified as ways to reduce the cost of translation services.

**Limited English Proficiency (LEP) Plan Outline**

There are five areas that comprise Volunteers of America Southeast’s LEP PLAN:

1. Identifying LEP Individuals Requiring Language Assistance
2. Providing Language Assistance
3. Training Staff
4. Providing Notice to LEP Persons
5. Monitoring and Updating the LEP Plan

1. **Identifying LEP Individuals Requiring Language Assistance**

Volunteers of America Southeast identifies an LEP person who requires language assistance by:

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

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

- Assigning a staff person to greet participants as they arrive at Volunteers of America Southeast sponsored events. By engaging participants in conversation, it
is possible to informally gauge each attendee’s ability to speak and understand English.

- Providing Language Identification Flash Cards at public meetings.

2. Providing Language Assistance

Volunteers of America Southeast assists an LEP person who requires language assistance by:

- Networking with local human service organizations that provide service to LEP individuals and seeking opportunities to provide information on Volunteers of America Southeast’s programs and services through these organizations.

- Posting Volunteers of America Southeast’s Title VI Notice, Complaint Procedures, Complaint Form, and LEP Plan on the agency’s website.

- Identifying in-house staff with other language abilities to assist with translation services.

- Making public notices, publications, and other printed materials (including webpage content) available in other languages.

- Placing statements in notices and publications to notify LEP persons that free language interpreter services are available for meetings with a seven-day advance notice.

- Providing Language Identification Flash Cards onboard Volunteers of America Southeast’s fleet, in Field Supervisor vehicles, and at the Administrative Office.

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

- Utilizing telephone translation services.

3. Training Staff

Volunteers of America Southeast will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Developing a curriculum and corresponding PowerPoint to educate staff on the Title VI requirements for providing meaningful access to services for LEP persons.
• Providing staff with a description of language assistance services offered by Volunteers of America Southeast.

• Providing staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI / LEP complaint.

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

4. Providing Notice to LEP Persons

Volunteers of America Southeast will provide notice to LEP persons in both oral and written communications by:

• Offering general information, such as operation hours, on Volunteers of America Southeast’s website in Spanish.

• Providing the following written communications in both English and Spanish:
  
  – Title VI Notice, Complaint Procedures, and Complaint Form.

5. Monitoring and Updating the LEP Plan

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services should be made accessible for LEP persons and to monitor changes in demographics and types of services.

Volunteers of America Southeast will update the LEP Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the most recent U.S. Census is made available, when clear and higher concentrations of LEP individuals are present in Volunteers of America Southeast’s service area, and/or during the process of updating Title VI Program.

Volunteers of America Southeast will monitor and update its LEP Plan by:

• Determining how the needs of LEP persons have been addressed.

• Determining the current LEP population in the service area and whether the need for translation services has changed.

• Determining whether local language assistance programs have been effective and sufficient to meet the need.
• Determining whether Volunteers of America Southeast’s financial resources are sufficient to fund the needed language assistance efforts.

• Determining whether Volunteers of America Southeast has fully complied with the goals of the LEP Plan.

• Determining whether complaints have been received concerning Volunteers of America Southeast’s failure to meet the needs of LEP individuals.

**Dissemination of Volunteers of America Southeast’s LEP Plan**

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

• Publishing the LEP Plan and the Title VI Plan on Volunteers of America Southeast’s website so that any person or agency with internet access can view and download these plans. Alternatively, any person or agency may also request a copy of the plan at no cost via telephone, fax, mail, or in person. LEP individuals may request that these plans be translated into various languages. If feasible, Volunteers of America Southeast will accommodate such requests.

• Distributing the LEP Plan to human service organizations in the service area.

Questions or comments regarding the LEP Plan may be submitted to Volunteers of America Southeast at the following address:

DeAnna Ferguson  
1204 Hillcrest Road  
Mobile, AL 36695  
251-300-3500  
www.voasoutheast.org
# Appendix E

Table Depicting Minority Representation on Planning and Advisory Bodies

<table>
<thead>
<tr>
<th>Body</th>
<th>Caucasian</th>
<th>Latino</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
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<tbody>
<tr>
<td>Population</td>
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<td>Name of Committee</td>
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<td>Name of Committee</td>
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<td>Name of Committee</td>
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Appendix F

Title VI Construction Project Analysis

Name of Agency: ____________________________
Contact Person: ____________________________
Mailing Address: ____________________________
City/State/Zip Code: _________________________
Contact Person: ____________________________ Title ________________________
Phone: ____________________________ Fax ________________________
E-Mail Address: ____________________________

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

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

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

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

7. Describe all mitigation and environment enhancement actions incorporated into the project to address the adverse effects, including any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and replacement of community resources destroyed by the project.
8. Describe the remaining effects, if any, and why further mitigation is not proposed.

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

All subrecipients must address each of the following:

1. Describe all pending applications for financial assistance currently provided by other Federal agencies to the applicant. None

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

none

3. Is your agency considered a minority organization: _____Yes  ____No

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

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

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

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

____x Black American  ____ Sub-Continent Asian-American
____ Hispanic American  ____ Asian-Pacific American
____ Native American   ____ Other
5. Has your Title VI Coordinator/EEO Officer changed during the reporting period or since your last Title VI Plan was approved? If yes, please provide the name and contact information for the new coordinator/EEO Office. No

6. 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?
Appendix H

Documentation of Title VI Authorization

RESOLUTION ADOPTING A TITLE VI PLAN

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

NOW, THEREFORE, be it resolved by the Board of Directors of Volunteers of America Southeast as follows:

The Board of Directors previously approved the Title VI Program on December 2, 2014 in order to comply with the Title VI federal requirements.

The Board appoints the Vice President of Services, in his/her capacity, will serve as the Title VI Officer and is authorized to revise and update the plan as necessary.

Adopted this 7th day of June, 2018.

Signature: Wallace T. Davis

Attest: Sherry Atchison

Typed Name: Wallace T. Davis

Typed Name: Sherry Atchison

Title: President/CEO

Title: Director Project Development