

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

**TITLE VI PROGRAM**

July 19, 2022

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

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## **I. Policy Statement**

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

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

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

The Baldwin County Commission/Baldwin Regional Area Transit System has developed a Title VI Notice to provide information to the public regarding the Baldwin County Commission/Baldwin Regional Area Transit System’s Title VI obligations and to inform the public of the protections against discrimination afforded to them by Title VI. The notice also includes contact information to file a discrimination complaint with the Baldwin County Commission/Baldwin Regional Area Transit System as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The Baldwin Regional Area Transit System has posted the Title VI Notice on the agency’s website and in public areas of the agency’s offices including the receptionist area and meeting rooms. The notice is also posted in all transit vehicles. This notice will be translated into other languages as needed. A copy of the notice is included as Appendix A.

## **III. Complaint Procedures and Form**

A Title VI complaint may be filed by any individual or individuals who allege that they have been subjected to discrimination or adverse impact under any FTA funded program or activity based on race, color, or national origin. The Baldwin County Commission/Baldwin Regional Area Transit System adopted Title VI complaint procedures to investigate and track complaints. A formal, signed, written Title VI complaint form must be filed within 180 days of the date of the alleged act of discrimination. A copy of the complaint form is included in Appendix B. The complaint procedures and complaint form are also posted on the Baldwin County Commission/Baldwin Regional Area Transit System website. If information is needed in another language, the complainant can contact 251-972-6817. The statement “If information is needed in another language, contact 251-972-6817 will

be posted with the complaint procedures in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

Completed complaint forms should be submitted to:

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

Once the complaint is received, the Baldwin County Commission/Baldwin Regional Area Transit System will review it to determine who has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Baldwin County Commission/Baldwin Regional Area Transit System's office. The Baldwin County Commission/Baldwin Regional Area Transit System will only process complaint forms that are complete and signed.

In a situation where the complainant is unable or incapable of providing a written complaint, a verbal complaint of discrimination may be made to the Baldwin County Commission/Baldwin Regional Area Transit System. Under these circumstances, the complainant will be interviewed and the Baldwin County Commission/Baldwin Regional Area Transit System will assist the complainant in converting the verbal allegations to a formal written complaint.

The Baldwin County Commission/Baldwin Regional Area Transit System has 15 business days to investigate the complaint. If more information is needed to resolve the case, the Baldwin County Commission/Baldwin Regional Area Transit System may contact the complainant. The complainant has 15 business days from the date of this letter to send requested information to the investigator assigned to the case. If the investigator does not receive the additional information from the complainant within 15 business days, the Baldwin County Commission/Baldwin Regional Area Transit System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

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

If the complainant is not satisfied with actions taken locally or if they demand further action, the complaint will be referred to:

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

A person may also file a complaint directly with the Federal Transit Administration:

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

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

The Baldwin County Commission/Baldwin Regional Area Transit System shall maintain a log of Title VI complaints received. The log shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken in response to the complaint. Active Title VI transit-related investigations and lawsuits shall also be included in this log. This log shall be included in the Title VI Program that is submitted to ALDOT every three years.

No Title VI transit-related investigations, complaints, or lawsuits have occurred since the previous submission of the Title VI Program to ALDOT. A template of the Log of Transit-Related Title VI Transit Investigations, Complaints, and Lawsuits that will be used if a complaint or lawsuit is filed can be found in Appendix C.

#### **V. Public Participation Plan**

The Baldwin County Commission/Baldwin Regional Area Transit System commits to provide early and continuous opportunities for public participation in the transit decision-making process. These opportunities are open to everyone including minority, low-income, and Limited English Proficiency (LEP) populations. The Public Participation Plan provides for an open exchange of information and ideas between the public and transit decision makers. The Baldwin County Commission/Baldwin Regional Area Transit System's Public Participation Plan is ongoing and reviewed regularly to identify, meet, and serve the community's needs.

In an effort to integrate the opinions of minority, low-income, and LEP populations into community outreach activities, the Baldwin County Commission/Baldwin Regional Area Transit System's public participation program will:

- Coordinate with community-based organizations to identify and implement strategies to reach out to members in the affected minority, low-income, and LEP communities.
- Reduce barriers to public participation from these segments of the population.
- Place public notices on transit websites, in the receptionist areas, and on transit vehicles.
- Utilize the media (social media, local newspapers, radio, television, mobile transit app) to notify minority, low-income, and LEP populations of public involvement efforts.
- Provide opportunities for public participation through means other than written communication, such as virtual meetings, personal interviews, or the use of recording devices to capture oral comments.
- Hold in-person public meetings in locations, facilities, and at meeting times that are convenient and accessible to the minority, low-income, and LEP populations.
- Ensure that the decision-making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.
- Develop transit and Title VI information in English and other languages as needed.
- Make public information available in electronically accessible formats.
- Distribute information at community events or piggyback engagement efforts onto regularly scheduled community meetings.
- Utilize interactive and collaborative online technologies, such as social media, blogs, video sharing, and transit mobile app.
- Cross-promote opportunities for public participation with municipalities, community organizations, housing authorities, apartment complexes, colleges, vocational schools, and major area employers.
- Develop signs, fliers, or other materials to mail or distribute to the general public and to post in libraries, community centers, etc.
- Use non-traditional media outlets to solicit input, such as local neighborhood publications and online outlets like YouTube, Twitter, Instagram and Facebook.
- Post public participation opportunities on the Baldwin County Commission's social media sites.

To date, the Baldwin County Commission/Baldwin Regional Area Transit System has participated in the following public outreach and involvement activities:

- Baldwin County Commission/Baldwin Regional Area Transit System staff members have participated in and supported Community-Based Transportation Programs for disadvantaged communities.

- Public Meetings have been held at convenient times and accessible locations for minority, low-income, and LEP populations.
- Meeting notifications have been published in newspapers that service minority, low-income, and LEP populations.
- Baldwin County Commission/Baldwin Regional Area Transit System staff members attended local meetings to identify community needs and to participate as a stakeholder agency.
- Baldwin County Commission/Baldwin Regional Area Transit System staff members participated in public outreach efforts to explain specific transit proposals and to solicit comments.
- Public notices were posted on the transit website, in the receptionist area, and on the transit vehicles.
- Title VI information was developed and distributed in English and Spanish.
- Notices of public participation opportunities were posted on the Baldwin County Commission social media sites.

## **VI. Limited English Proficiency Plan**

The Four Factor Analysis is used to identify Limited English Proficient (LEP) persons who need language assistance, outline how language assistance is provided, and describe how the Baldwin County Commission/Baldwin Regional Area Transit System considers the needs of LEP persons. This assessment balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Baldwin County Commission/Baldwin Regional Area Transit System's program. In addition to the number or proportion of LEP persons served, the analysis identifies:
  - A. How LEP persons interact with the Baldwin County Commission/Baldwin Regional Area Transit System;
  - B. Where LEP communities are located and the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
  - C. The literacy skills of LEP populations in their native languages to determine whether document translation will be an effective practice or whether translated auditory resources will be more effective; and
  - D. Whether or not LEP persons are underserved by the Baldwin County Commission/Baldwin Regional Area Transit System due to language

barriers.

2. The frequency with which LEP persons come into contact with the transit program, activities, or services. The following areas were evaluated:
  - A. Transit user demographics;
  - B. Trips scheduled through the mobile app, websites, and over the phone;
  - C. Public meeting participation;
  - D. Customer service interactions;
  - E. Rider surveys; and
  - F. Operator surveys.
3. The nature and importance of the Baldwin County Commission/Baldwin Regional Area Transit System's programs, activities, or services to people's lives.
4. The resources available to the Baldwin County Commission/Baldwin Regional Area Transit System for outreach to LEP persons and the costs associated with that outreach.

The Baldwin County Commission/Baldwin Regional Area Transit System developed a Limited English Proficiency Plan which is located in Appendix D. It includes:

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

#### Safe Harbor Provision

In accordance with the Safe Harbor Provision, the Baldwin County Commission/Baldwin Regional Area Transit System identified the following language group which exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be



served by the program: Spanish. This language group was identified by using the Limited English Proficiency Assessment and the Staff Survey - Limited English Proficiency Interactions. The assessment and survey are included in Appendix D along with a copy of the current census data for the Baldwin County Commission/Baldwin Regional Area Transit System's service area.

The Baldwin County Commission/Baldwin Regional Area Transit System focuses translation efforts in Spanish, which is the largest language group other than English. Vital documents such as public notices, complaint forms, and complaint procedures are available in Spanish. The Baldwin County Commission/Baldwin Regional Area Transit System also provides free translation services upon request.

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

The Baldwin County Commission/Baldwin Regional Area Transit System will not deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program on the grounds of race, color, or national origin.

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

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

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

When acquiring land and/or constructing facilities, the Baldwin County Commission/Baldwin Regional Area Transit System shall not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any Federally funded transit program based on the grounds of race, color, or national origin. The Baldwin County Commission/Baldwin Regional Area Transit System shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and all subsequent provisions.

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

found in Appendix F.

### **IX. Additional Title VI Information**

Additional Title VI information is included in Appendix G.

### **X. Board Meeting Resolution of Approved Title VI Program**

The Baldwin County Commission approved the Title VI program on July 19, 2022. 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**

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

For more information on the civil rights program and the procedures to file a complaint, contact:  
**Baldwin Regional Area Transit System**  
**P. O. Box 907, 18100 County Road 54**  
**Robertsdale, AL 36567**  
**251-972-6817**  
**[www.baldwincountyal.gov](http://www.baldwincountyal.gov)**

A complaint may be filed directly with the Federal Transit Administration by contacting:  
**Office of Civil Rights**  
**Attention: Complaint Team**  
**East Building, 5<sup>th</sup> Floor-TCR**  
**1200 New Jersey Ave., SE**  
**Washington DC 20590**  
**[FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)**

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

Title VI Notice to the Public in Spanish

## **TÍTULO VI AVISO DE PROTECCIÓN CONTRA LA DISCRIMINACIÓN**

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

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

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

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, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE  
Washington DC 20590  
[FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)**



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

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

Signature and date required below

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

Please submit this form in person, by mail, or via e-mail at the contact information below:

Ann Simpson  
Baldwin Regional Area Transit System  
P. O. Box 907  
Robertsdale, AL 36567  
[ann.simpson@baldwincountyal.gov](mailto:ann.simpson@baldwincountyal.gov)

## **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 Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System. Si se necesita información en otro idioma, el denunciante puede comunicarse con 251-972-6817

Los formularios de queja completados deben enviarse a:

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

Una vez recibida la denuncia, la Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System . La Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System. En estas circunstancias, se entrevistará al denunciante y la Baldwin County Commission/Baldwin Regional Area Transit System ayudará al denunciante a convertir las alegaciones verbales en una denuncia formal por escrito.

La Baldwin County Commission/Baldwin Regional Area Transit System tiene 15 días hábiles para investigar la denuncia. Si se necesita más información para resolver el caso, la Baldwin County Commission/Baldwin Regional Area Transit System 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 Baldwin County Commission/Baldwin Regional Area Transit System 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 ingles). 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 Baldwin County Commission/Baldwin Regional Area Transit System.

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



### Formulario de queja del Título VI

<b>Sección I</b>	
Nombre:	
Dirección:	
Teléfono (Casa o móvil):	Teléfono (Oficina):
Correo Electronico:	
<b>Sección II</b>	
¿Está presentando esta queja en su propio nombre? <span style="float: right;"><input type="checkbox"/> Si <input type="checkbox"/> No</span>	
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. <span style="float: right;"><input type="checkbox"/> Sí <input type="checkbox"/> No</span>	
<b>Sección III</b>	
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.	
_____	
_____	
_____	
_____	
_____	
_____	
_____	

<b>Sección IV</b>		
¿Ha presentado previamente una queja del Título VI con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
<b>Sección V</b>		
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <span style="float: right;"><input type="checkbox"/> Sí <input type="checkbox"/> No</span>		
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: _____		
Titulo: _____		
Agencia: _____		
Dirección: _____		
Teléfono: _____		
Corro Electronico: _____		
<b>Sección VI</b>		
Nombre de la agencia en la que se presenta la queja: _____		
Persona de contacto: _____		
Titulo: _____		
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, on envíelo por correo o por correo electrónico utilizando la información de contacto a continuación:

Ann Simpson  
Baldwin Regional Area Transit System  
P. O. Box 907  
Robertsdale, AL 36567  
[ann.simpson@baldwincountyal.gov](mailto:ann.simpson@baldwincountyal.gov)

## Appendix C

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

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

## Appendix D

### Limited English Proficiency Assessment

<b>Transit Provider:</b>	BRATS			
<b>Date Completed:</b>	JUNE 15, 2022			
<p>Examine Census Data at <a href="https://data.census.gov/cedsci/advanced">https://data.census.gov/cedsci/advanced</a></p> <p>1) Select "Geography" and the location(s) to be included (Select "Place" to choose a City)                  2) Select "Topics" and then "Populations and People" and then "Language Spoken at Home"                  3) Click "Search" in the bottom-right corner                  4) Select "<b>S1601</b>   LANGUAGE SPOKEN AT HOME"</p> <p><u>Notes</u>                  The default data source will be the most recent American Community Survey 5-Year Estimates. The table will present a breakdown of the languages spoken in the selected geography and identify the population estimate that speaks the language and their ability to speak English less than "very well".                  Add up the population estimates for all geographically relevant cities, counties, and/or census tracts in the service area.</p>				
Geography (City/County/ Census Tract)	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
Baldwin County	206,329	3,733	1.8%	Spanish, Indo-European, and Asian & Pacific Island
<b>Totals</b>				
1. Survey your drivers. Do they indicate that there is a need for language assistance for riders? If so, which languages?		Yes, Occasionally Spanish. The mobile app is available in Spanish.		
2. Survey your receptionist, customer service representative, and scheduler/dispatcher. Do they indicate that there is a need for language assistance for riders? If so, which languages?		Yes, Occasionally Spanish. The mobile app is available in Spanish.		
3. Inventory languages other than English that are spoken by staff.		1 BRATS employee is bilingual, English/Spanish.		

Staff Survey - Limited English Proficiency Interactions

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) Did you encounter any LEP people in your work activities in the past six months?
  
- 2) Which language(s) did you encounter in the past six months?
  
- 3) How many times did you encounter a LEP person speaking the language selected in Question 2 in the past six months?
  
- 4) Which type of work activity were you doing when you encountered this language?  
Choose all that apply:
  - Outreach/Public Meeting
  - E-mail
  - Phone Call
  - Other, please specify: \_\_\_\_\_

## Census Data

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

TITLE VI PROGRAM  
BALDWIN COUNTY COMMISSION/BALDWIN REGIONAL AREA TRANSIT SYSTEM  
July 19, 2022

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

# LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Baldwin Regional Area Transit System  
18100 County Road 54  
Robertsdale, Al 36567  
251-972-6817  
[www.baldwincountyal.gov](http://www.baldwincountyal.gov)



## **Introduction**

This Limited English Proficiency Plan (LEP) was prepared to address the Baldwin County Commission/Baldwin Regional Area Transit System's responsibilities as a recipient of Federal financial assistance relating to the needs of individuals with limited English skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, et seq. and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

## **Plan Summary**

The Baldwin County Commission/Baldwin Regional Area Transit System developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access transit services provided by the Baldwin County Commission/Baldwin Regional Area Transit System. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and/or have limited ability to read, speak, write, or understand English.

This plan outlines how the Baldwin County Commission/Baldwin Regional Area Transit System identifies a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how LEP persons are notified that assistance is available.

As the first step in preparing this plan, the Baldwin County Commission/Baldwin Regional Area Transit System took the U.S. DOT Four Factor Analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service sponsored by the Baldwin County Commission/Baldwin Regional Area Transit System.
2. The frequency with which LEP persons come into contact with the Baldwin County Commission/Baldwin Regional Area Transit System's programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the Baldwin County Commission/Baldwin Regional Area Transit System to people's lives.
4. The resources available to the Baldwin County Commission/Baldwin Regional Area Transit System for outreach to LEP persons and the costs associated with that outreach.

**Four Factor Analysis Results**

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service sponsored by Baldwin Regional Area Transit System.***

The Baldwin County Commission/Baldwin Regional Area Transit System reviewed the 2020 U.S. Census Report and determined that the total population for Baldwin County is 206,329. Of those persons, 3,733 persons (1.8%) residents report speaking English less than very well. Those persons with limited English proficiency speak the following languages at home: 2,595 speak Spanish, 562 speak Indo-European languages, 576 speak Asian and Pacific Island languages and 0 speak other languages. The most popular language spoken at home (other than English) is Spanish. The Baldwin County Commission/Baldwin Regional Area Transit System will likely encounter more persons who speak Spanish that benefit from the transit programs than any other LEP persons.

- 2. The frequency with which LEP persons come into contact with the Baldwin County Commission/Baldwin Regional Area Transit System’s programs, activities, or services.***

The Baldwin County Commission/Baldwin Regional Area Transit System assessed the frequency with which staff and drivers have contact with LEP persons, both presently and in the past. The following contact points and frequencies were identified:

CONTACT POINTS	FREQUENCY
Drivers - Demand Response	Minimum
Customer Service Representatives	Minimum
Web Site	Minimum
Field Supervisors	Minimum
Transit Mobile App	Minimum

- 3. The nature and importance of programs, activities, or services provided by the Baldwin County Commission/Baldwin Regional Area Transit System to people’s lives***

Baldwin Regional Area Transit System provides door-to-door, demand-response transportation for medical appointments, employment, retail shopping, and recreational opportunities.

The largest geographic concentration of LEP individuals in the Baldwin County Commission/Baldwin Regional Area Transit System’s service area communicates by speaking Spanish. These individuals are often dependent upon our specialized transportation services. It is also likely that the Baldwin County Commission/Baldwin Regional Area Transit System will encounter LEP individuals at community outreach events.

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

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

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

Five action items comprise the Baldwin County Commission/Baldwin Regional Area Transit System's Limited English Proficiency Plan:

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

**1. Identify Individuals Requiring Language Assistance**

The Baldwin County Commission/Baldwin Regional Area Transit System identifies an LEP person who requires language assistance by:

- Examining customer service records to identify language assistance that has been received in the past at meetings, online, or over the phone to determine whether language assistance might be needed for similar situations in the future;
- Surveying drivers and other first-line staff who have direct or indirect contact with LEP individuals; and.
- Assigning a staff person to greet participants as they arrive at events sponsored by Baldwin County Commission/Baldwin Regional Area Transit System. By engaging participants in conversation, staff may informally gauge each attendee's ability to speak and understand English.

**2. Provide Language Assistance**

The Baldwin County Commission/Baldwin Regional Area Transit System assists an LEP person who requires language assistance by:

- Networking with local human service organizations that provide service to LEP individuals and seeking opportunities to provide information on the Baldwin County Commission/Baldwin Regional Area Transit System's programs and services through these organizations;
- Posting the Baldwin County Commission/Baldwin Regional Area Transit System's Title VI Notice, Complaint Procedures, Complaint Form, and Limited English Proficiency Plan on the agency's website;
- Providing travel training to LEP persons;
- Identifying in-house staff with other language abilities to assist with translation services;
- Making public notices, publications, and other printed materials (including online content) available in other languages;
- Providing language translation for LEP persons on the BRATS On Demand mobile app and the SMS text messages;
- Utilizing a web-based translation service application such as Google Translate; and.

### **3. Train Staff**

The Baldwin County Commission/Baldwin Regional Area Transit System will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Educate staff on the Title VI requirements for providing meaningful access to services for LEP persons;.
- Providing staff with a description of language assistance services offered by the Baldwin County Commission/Baldwin Regional Area Transit System;
- Providing staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI complaint; and
- Providing Conversational Spanish training classes available upon request.

### **4. Provide Notice to LEP Persons**

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

notice to LEP persons in both oral and written communications by:

- Offering general information, such as operation hours, fares, etc., on the Baldwin County Commission/Baldwin Regional Area Transit System's customer service line.
- Providing the following written communications in both English and Spanish:
  - Brochures/Flyers
  - Title VI Notice
  - Complaint Procedures
  - Complaint Form.

### **5. Monitor and Update the LEP Plan**

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

The Baldwin County Commission/Baldwin Regional Area Transit System will update the Limited English Proficiency Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the most recent U.S. Census is made available, when clear and higher concentrations of LEP individuals are present in the Baldwin County Commission/Baldwin Regional Area Transit System's service area, and/or during the process of updating the Baldwin County Commission/Baldwin Regional Area Transit System's Title VI Program.

The Baldwin County Commission/Baldwin Regional Area Transit System will monitor and update its Limited English Proficiency Plan by:

- Determining how the needs of LEP persons are addressed;
- Determining the current LEP population in the service area and whether the need for translation services has changed;
- Determining whether local language assistance programs are effective and sufficient to meet the need;
- Determining whether the Baldwin County Commission/Baldwin Regional Area Transit System's financial resources are sufficient to fund the needed language assistance efforts;
- Determining whether the Baldwin County Commission/Baldwin Regional Area Transit System has fully complied with the goals of the Limited English Proficiency Plan;

- Determining whether complaints have been received concerning the Baldwin County Commission/Baldwin Regional Area Transit System's failure to meet the needs of LEP individuals.

**Dissemination of the Baldwin County Commission/Baldwin Regional Area Transit System's LEP Plan**

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

- Publishing the LEP Plan and the Title VI Plan on the Baldwin County Commission/Baldwin Regional Area Transit System's website so that any person or agency with internet access can view and download these documents. Alternatively, any person or agency may also request a copy of the plan at no cost via telephone, e-mail, mail, or in-person. LEP individuals may request that these plans be translated into various languages. If feasible, the Baldwin County Commission/Baldwin Regional Area Transit System will accommodate such requests.
- Distributing the Limited English Proficiency Plan to human service organizations in the service area.

Questions or comments regarding the Limited English Proficiency Plan may be submitted to the Baldwin County Commission/Baldwin Regional Area Transit System using the following contact information:

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

## Appendix E

Table Depicting Minority Representation on Planning and Advisory Bodies

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian</b>	<b>Native American</b>	<b>Other</b>
<b>Population</b>	<b>82.9%</b>	<b>4.6%</b>	<b>8.7%</b>	<b>.9%</b>	<b>.6%</b>	<b>2.2%</b>
<b>Baldwin Regional Area Transit System Steering Committee</b>	<b>92%</b>	<b>0%</b>	<b>8%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
<b>Eastern Shore MPO Technical Advisory Committee</b>	<b>87.5%</b>	<b>0%</b>	<b>12.5%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
<b>Name of Committee</b>						





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

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

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

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

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

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9. Provide a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation and environmental enhancement actions implemented in predominantly non-low-income and non-minority areas if the project traverses these different areas. If there is no basis for such a comparison, describe why that is so.

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## Appendix G

### Additional Title VI Information

All subrecipients must address each of the following:

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

5307 Urban Transportation Funding  
5311 Urban Transportation Funding

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.)

The Alabama Department of Transportation, Office of Public Transportation conducted a management review including civil rights compliance review in January 2022. There were no civil rights compliance findings.

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

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

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

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

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

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

5. Has your Title VI Coordinator/EEO Officer changed during the reporting period or since your last Title VI Plan was approved? If yes, please provide the name and contact information for the new coordinator/EEO Office.

Yes, Ron Cink, Interim County Administrator 251-580-1646  
[rcink@baldwincountyal.gov](mailto:rcink@baldwincountyal.gov)

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.

N/A

- 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?

N/A

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

N/A

## **Appendix H**

### Documentation of Title VI Authorization

**RESOLUTION NUMBER 2022-114**

**RESOLUTION ADOPTING A TITLE VI PROGRAM**

**WHEREAS**, the Baldwin County Commission is a direct recipient of Federal financial assistance from the Federal Transit Administration and a sub-recipient from the Alabama Department of Transportation in support of transit services which imposes certain obligations upon the recipient, including complying with the Title VI Federal requirements; and

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

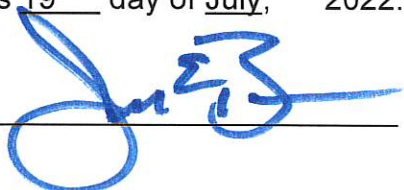
**WHEREAS**, the Baldwin County Commission commits to assure that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits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

**NOW, THEREFORE**, be it resolved by the Baldwin County Commission on behalf of the Baldwin Regional Area Transit System as follows:

The Baldwin County Commission approves the proposed Title VI Program in order to comply with the Title VI Federal requirements.


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

Adopted this 19<sup>th</sup> day of July, 2022.

Signature: 

Printed Name: James E. Ball

Title: Chairman

Attest: 

Printed Name: Ronald J. Cink

Title: Interim County Administrator

