


Covington Area Transit System
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The Covington Area Transit System has made a change to their Title VI by updating the Title VI Officer and the Senior Transportation Planner for ALDOT. No other information has been changed.



Gregory White, Chairman
Covington County Commission

Covington Area Transit System

TITLE VI PROGRAM

Date Completed: May 10, 2022

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I. Policy Statement

The Covington Area Transit System (hereafter referred to simply as CATS) 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 the CATS in its administration and management of activities related to Title VI. CATS Title VI Coordinator is Tami Baxley, Director, who can be contacted at 334-428-2667 and/or tami.baxley@covcounty.com.

II. Notice to the Public

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

CATS has posted the Title VI Notice on the agency’s website and in public areas of the agency’s office(s) including the receptionist area and meeting rooms. The notice is also posted in all transit vehicles and at all transit stations and/or stops. This notice will be translated into 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. CATS 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 Covington County Commission website (www.covcounty.com). If information is needed in another language, the complainant can contact 334-428-2667. The statement "If information is needed in another language, contact 334-428-2667 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:

Tami Baxley
Director
Covington Area Transit System
260 Hillcrest Drive Box 14
Andalusia, AL 36420
334-428-2667
tami.baxley@covcounty.com

Once the complaint is received, CATS will review it to determine who has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by CATS office. CATS 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 CATS. Under these circumstances, the complainant will be interviewed and CATS will assist the complainant in converting the verbal allegations to a formal written complaint.

CATS has 15 business days to investigate the complaint. If more information is needed to resolve the case CATS 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, CATS 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, they 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 CATS.

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, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

IV. Transit-Related Investigations, Complaints, and Lawsuits

CATS 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

CATS 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 Proficient (LEP) populations. The Public Participation Plan provides for an open exchange of information and ideas between the public and transit decision makers. CATS 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, CATS Public Participation Plan 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.
- Utilize the media (social media, local newspapers and magazines, radio, television, etc.) to notify minority, low-income, and LEP populations of public involvement efforts.
- 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.

To date, CATS has participated in the following public outreach and involvement activities:

- CATS staff members participated in and supported Community-Based Transportation Programs for disadvantaged communities.
- Meeting notifications have been published in outlets that service minority, low-income, and LEP populations.
- CATS staff members attended local meetings to identify community needs and to participate as a stakeholder agency.
- Public notices were posted on the transit website, in the receptionist area, on the transit vehicles, and at stations/stops.

The Public Participation Plan is evaluated with the assistance of the public who participate in public involvement activities and events. The Public Participation Effectiveness Survey in Appendix D is used to monitor changes in demographics and track the effectiveness of CATS public involvement activities and events held in-person and virtually. Names are not collected so responses are anonymous. The survey is available in English and languages that are commonly spoken by LEP persons in CATS service area. Participants are encouraged to request assistance from staff members as needed.

Surveys completed after in-person activities and events are deposited into drop boxes by participants. Drop boxes are positioned near exits and clearly labeled in English and languages that are commonly spoken by LEP persons in CATS service area.

The survey form is uploaded to a survey platform (Google Forms, SurveyMonkey, etc.) to collect anonymous submissions after virtual events.

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 CATS 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 a program, activity, or service sponsored by CATS. In addition to the number or proportion of LEP persons served, the analysis identifies:
 - A. How LEP persons interact with CATS.
 - 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 CATS due to language barriers.

2. The frequency with which LEP persons come into contact with CATS program, activities, or services. The following areas were evaluated:
 - A. Transit user demographics;
 - B. Ticket sales through vending machines, outlets, websites, in-person, and over the phone;
 - C. Public meeting participation;
 - D. Customer service interactions in-person, over the phone, and online, (including e-mail and social media);
 - E. Rider surveys; and
 - F. Operator surveys.
3. The nature and importance of programs, activities, or services provided by CATS to people's lives.
4. The resources available to CATS for outreach to LEP persons and the costs associated with that outreach.

CATS developed a Limited English Proficiency Plan which is located in Appendix E. 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 CATS 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, CATS identified the following language group(s) which exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be served by the program: None. This language group(s) were identified by using the Limited English Proficiency Assessment and the Staff Survey - Limited English Proficiency Interactions. The assessment and survey are included in Appendix E along with a copy of the current census data for CATS service area.

CATS focuses translation efforts in English which is (are) the largest language group(s). Vital documents such as public notices, complaint forms, and complaint procedures are available in English. CATS also provides free translation services upon request.

VII. Minority Representation on Planning and Advisory Bodies

CATS 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.

CATS does not have transit-related non-elected planning boards, advisory councils, or committees that are selected by CATS. If CATS establishes advisory bodies, a table will be used to depict the racial breakdown of the membership and will be included in future Title VI programs. A sample table is included in Appendix F. Additionally, 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

When acquiring land and/or constructing facilities, CATS 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. CATS shall comply with all Federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and subsequent provisions.

CATS 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, CATS 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 G.

IX. Additional Title VI Information

Additional Title VI information is included in Appendix H.

X. Board Meeting Resolution of Approved Title VI Program

The Covington County Commission approved the Title VI Program on May 10, 2022. A copy of the **AUTHORIZING RESOLUTION** is included as Appendix I.

Appendix A

Title VI Notice to the Public

TITLE VI NOTICE OF PROTECTION AGAINST DISCRIMINATION

Covington 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 Covington Area Transit System.

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

Covington Area Transit System
260 Hillcrest Drive – Box 14
Andalusia, AL 36420
334-428-2667
tami.baxley@covcounty.com

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

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

If information is needed in another language,
contact 334-428-2667.

Appendix B

Title VI Complaint Form

Section I	
Name:	
Address:	
Phone (Home or Cell):	Phone (Work):
E-mail:	
Section II	
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> 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 submitting a complaint:	
Please explain why you have filed for a third party: _____	
Please confirm that you obtained the permission of the aggrieved party if you are filing on their behalf. <input type="checkbox"/> Yes <input type="checkbox"/> No	
Section III	
I believe the discrimination I experienced was based on (check all that apply):	
<input type="checkbox"/> Race	<input type="checkbox"/> Color <input type="checkbox"/> National Origin
Date of Alleged Discrimination (MM/DD/YYYY): _____	
Explain as clearly as possible what happened and why you believe you were the target of discrimination. 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, check and specify 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: _____	
Section VI	
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 using the contact information below:

Tami Baxley
 CATS
 260 Hillcrest Drive Box 14
 Andalusia, AL 36420
 tami.baxley@covcounty.com

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

Appendix C

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

	Date (MM/DD/YYYY)	Summary of Allegations (Include basis of complaint: race, color, or national origin)	Status: Pending or Closed	Action(s) Taken
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				

Appendix D

Public Participation Effectiveness Survey

Date of Public Involvement Activity or Event: <DATE>
Transit Project: <PROJECT NAME>

Thank you for participating in our planning process! Your engagement helps the <AGENCY> improve transit services for our service area. Please complete the brief survey below so we can learn how to improve our public involvement activities and events. Your feedback is anonymous.

This survey is also available in <LANGUAGE(S)>. Please inform a staff member if you need this survey in a different language or require assistance to complete it.

1. How much do you agree or disagree with each statement below?	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
• I understand the purpose of this public involvement activity or event.	○	○	○	○	○
• I understand the purpose of the project.	○	○	○	○	○
• Everyone who wanted to speak was given time to do so.	○	○	○	○	○
• This public involvement activity or event was planned in a way that those affected could participate regardless of having limited English proficiency, disabilities, lack of access, or any other barriers.	○	○	○	○	○
• Resources (translation services, materials in the languages of the affected communities, etc.) were provided to persons with limited English proficiency.	○	○	○	○	○
• The public involvement process increased my trust of the agencies involved in the project.	○	○	○	○	○
• Overall, I am satisfied with this public involvement activity or event.	○	○	○	○	○

2. How would you improve the public involvement process?

3. How did you learn about this public involvement activity or event? Please be specific.

4. Which languages do you read, write, and/or understand?

5. How well do you read English?

- Very well
- Somewhat well
- Not well

6. How well do you understand spoken English?

- Very well
- Somewhat well
- Not well

Appendix E

Limited English Proficiency Assessment
(Assessment provided as a tool to assist with demographics & Four Factor Analysis)

Transit Provider:	Covington Area Transit System			
Date Completed:	May 10, 2022			
<p>Examine Census Data at https://data.census.gov/cedsci/advanced</p> <ol style="list-style-type: none"> 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 "S1601 LANGUAGE SPOKEN AT HOME" <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
Covington	37,200			
Totals				
1. Survey your drivers. Do they indicate that there is a need for language assistance for riders? If so, which languages?				
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?				

3. Contact major employers. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Employer	Response
4. Contact human service agencies. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Agency	Response
5. Contact local towns and cities, including the police departments. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Town/City/Department	Response
6. Contact the local school systems including colleges and vocational schools. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
School System	Response

7. Contact the local churches. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Church	Response
8. Inventory languages other than English that are spoken by staff.	
9. Do the responses above indicate a need for language assistance for potential transit users? If so, which languages?	

Staff Survey - Limited English Proficiency Interactions
(Survey provided as a tool to assist with Four Factor Analysis)

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

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

LIMITED ENGLISH PROFICIENCY PLAN

Covington Area Transit System

260 Hillcrest Drive Box 14

Andalusia, AL 36420

334-428-2667

tami.baxley@covcounty.com

www.covcounty.com

Introduction

This Limited English Proficiency Plan was prepared to address CATS responsibilities as a recipient of Federal financial assistance relating to the needs of individuals with limited English proficiency. This plan was 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 based on race, color, or national origin.

Plan Summary

CATS developed this Limited English Proficiency Plan to help identify reasonable steps to provide language assistance to persons with limited English proficiency who wish to access transit services provided by CATS. 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 CATS 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 CATS completed 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 CATS
2. The frequency with which LEP persons come into contact with CATS programs, activities, or services
3. The nature and importance of programs, activities, or services provided by the CATS to people's lives
4. The resources available to the CATS 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 CATS

CATS reviewed the 2020 U.S. Census Report and determined that the total population for Covington County is 37,570. Of those persons, 1.08% residents report speaking Spanish less than very well. The most popular language spoken at home (other than English) is Spanish. CATS 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 CATS programs, activities, or services

CATS 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 (Low, Medium, or High)
Drivers – Fixed Route	N/A
Drivers – Demand Response	Low
Information Line	Low
Dispatchers	Low
Route Guides	N/A
Reservationist	Low
Website	Low
Social Media	N/A
Receptionist	N/A
Field Supervisors	Low
Annual Programs, Activities, and Events	N/A

3. The nature and importance of programs, activities, or services provided by CATS to people’s lives

The largest geographic concentration of LEP individuals in CATS service area communicates by speaking Spanish. These individuals are not currently dependent upon our transportation services, but they may need our services in the future. CATS provides transportation to people who are seeking alternate, affordable modes of transportation or who may be homebound much of the time if not for this service.

4. The resources available to CATS for outreach to LEP persons and the costs associated with that outreach

CATS assessed its resources and determined that funds are available within the current budget for providing language assistance. CATS 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 CATS 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 Plan Outline

Five action items comprise CATS Limited English Proficiency Plan:

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

1. Identify Individuals Requiring Language Assistance

CATS identifies an LEP person who requires language assistance by:

- Regularly surveying drivers and other first-line staff who have direct or indirect contact with LEP individuals; and
-
- Provide Language Identification Flash Cards

2. Provide Language Assistance

CATS 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 CATS programs and services through these organizations;
- Posting CATS Title VI Notice, Complaint Procedures, Complaint Form, and Limited English Proficiency Plan on Covington County Commission website;
- Providing Language Identification Flash Cards onboard CATS fleet, in field supervisor vehicles, at the administrative office, and at public meetings;
- Utilizing a web-based translation service application such as Google Translate; and
- Utilizing telephone translation services.

3. Train Staff

CATS will train staff members on their roles and responsibilities in providing meaningful access to services for LEP persons by:

- Providing staff with a description of language assistance services offered by CATS.
- Providing staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI complaint; and
- Instructing staff on the use of Language Identification Flash Cards.

4. Provide Notice to LEP Persons

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

- Offering general information, such as hours of operation, fares, etc., on CATS customer service line in English and Spanish:

- Providing the following written communications in both English.
 - Introduction section of CATS Route Guides which contains information on fares, accessibility, fare/ticket discounts, and general riding information;
 - Interior bus signage that displays safety or system policy information;
 - Title VI Notice, Complaint Procedures, and Complaint Form.

5. Monitor and Update the Limited English Proficiency 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.

CATS 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 CATS service area, and/or during the process of updating CATS Title VI Program.

CATS 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 CATS financial resources are sufficient to fund the needed language assistance efforts;
- Determining whether CATS has fully complied with the goals of the Limited English Proficiency Plan; and
- Determining whether complaints were received concerning CATS failure to meet the needs of LEP individuals.

Dissemination of CATS Limited English Proficiency Plan

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

- Publishing the Limited English Proficiency Plan and the Title VI Program on the Covington County Commission website so that any person or agency with internet access can view and download these documents. Alternatively, any person or agency may request a copy of the documents 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, CATS will accommodate such requests.
- Sharing updates to the Limited English Proficiency Plan on CATS social media sites.
- 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 CATS using the following contact information:

Tami Baxley
260 Hillcrest Drive Box 14
Andalusia, AL 36420
334-428-2667
tami.baxley@covcounty.com
www.covcounty.com



- | | | |
|--------------------------|--|---------------------|
| <input type="checkbox"/> | Mark this box if you read or speak English. | English |
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | Arabic |
| <input type="checkbox"/> | Խնդրում ենք նշում կատարել այս քառակուսում,
եթե խոսում կամ կարդում եք հայերեն: | Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | Bengali |
| <input type="checkbox"/> | ល្អប្រសើរណាស់ប្រសិនបើ ប្រើអ្នកអាច ប្តូរិយាយភាសា ខ្មែរ ។ | Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | Dutch |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | Farsi |
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français. | French |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | German |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | Greek |
| <input type="checkbox"/> | Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen. | Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | Hindi |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | Hmong |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet. | Hungarian |



Alabama Department of Transportation
Card 2 of 2

Language Identification Cards

Instructions: Place a check by the language spoken.

- | | |
|---|-------------------|
| <input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | <i>Ilocano</i> |
| <input type="checkbox"/> Marchi questa casella se legge o parla italiano. | <i>Italian</i> |
| <input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。 | <i>Japanese</i> |
| <input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | <i>Korean</i> |
| <input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືຢາກພາສາລາວ. | <i>Laotian</i> |
| <input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | <i>Polish</i> |
| <input type="checkbox"/> Assinale este quadrado se você lê ou fala português. | <i>Portuguese</i> |
| <input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți românește. | <i>Romanian</i> |
| <input type="checkbox"/> Пометьте этот квадратик, если вы читаете или говорите по-русски. | <i>Russian</i> |
| <input type="checkbox"/> Обележите овај квадратик уколико читате или говорите српски језик. | <i>Serbian</i> |
| <input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | <i>Slovak</i> |
| <input type="checkbox"/> Marque esta casilla si lee o habla español. | <i>Spanish</i> |
| <input type="checkbox"/> Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | <i>Tagalog</i> |
| <input type="checkbox"/> ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย. | <i>Thai</i> |
| <input type="checkbox"/> Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | <i>Tongan</i> |
| <input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | <i>Ukrainian</i> |
| <input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | <i>Urdu</i> |
| <input type="checkbox"/> Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | <i>Vietnamese</i> |
| <input type="checkbox"/> באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | <i>Yiddish</i> |

Appendix F

Table Depicting Minority Representation on Planning and Advisory Bodies

Number of People Represented on the Committee						
	Caucasian	Hispanic or Latino	African American	Asian American	Native American	Other: _____
Population						
<Name of Committee>						
<Name of Committee>						
<Name of Committee>						

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

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

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.

6. For each of the identified low-income and/or minority communities and minority-owned businesses, describe the potential 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. 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.

Appendix H

Additional Title VI Information

All ALDOT subrecipients must address each of the following:

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

NONE

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

No civil rights compliance reviews have been conducted.

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

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

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

4. Does your agency provide transportation services to minority communities?

Yes No

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

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

5. Did your Title VI Coordinator/EEO Officer change 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 Title VI Coordinator/EEO Officer.

**Tami Baxley, Director
Covington Area Transit System, CATS
260 Hillcrest Drive Box 14
Andalusia, AL 36420
334-428-2667
tami.baxley@covcounty.com**

6. Did your organization's projects and/or services that have Title VI, Limited English Proficiency, or Environmental Justice impacts change?

Yes 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 percentage of LEP populations and/or populations impacted by environmental injustice were affected by the project and/or service change?

**Resolution 22-05-10-01
Appendix I**

Documentation of Title VI Authorization

RESOLUTION ADOPTING A TITLE VI PROGRAM

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

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

WHEREAS, Covington 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 **Covington County Commission** as follows:

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

The **Director** 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 10 day of May, 2022.

Signature: 

Printed Name: Greg White

Title: Covington County Chairman

Attest: 

Printed Name: Karen L. Sowell

Title: Covington County Administrator

