

EAST CENTRAL MENTAL HEALTH CENTER

TITLE VI PROGRAM

October 20, 2015

200 Cherry Street
Troy, Alabama 36081
334-566-6022
www.eastcentralmhc.org

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I. Policy Statement

The East Central Mental Health Center 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 East Central Mental Health Center in its administration and management of Title VI related activities. The East Central Mental Health Center's Title VI Coordinator is Don Schofield, Executive Director. He can be contacted at 334-566-6022 and/or dschofield@eastcentralmhc.org.

II. Notice to the Public

The East Central Mental Health Center has developed a Title VI Notice to provide information to the public regarding the East Central Mental Health Center'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 East Central Mental Health Center as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The East Central Mental Health Center 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. This notice will be translated into languages other than English as needed. A copy of the notice is included as Appendix A.

III. Complaint Procedures and Form

A Title VI complaint may be filed by any individual or individuals who allege that he or she has been subjected to discrimination or adverse impact under any FTA funded program or activity based on race, color, or national origin. The East Central Mental Health Center has adopted Title VI complaint procedures for investigating and tracking complaints. A formal, signed, written Title VI complaint form must be filed within 180 days of the date of the alleged act of discrimination. A copy of the complaint form is included in Appendix B. The complaint procedures and complaint form are also posted on the East Central Mental Health Center's website*. Completed forms should be submitted to:

Don Schofield
Executive Director
East Central Mental Health Center
200 Cherry Street
Troy, Alabama 36081
334-566-6022
334-566-5346 Fax
dschofield@eastcentralmhc.org

Once the complaint is received, the East Central Mental Health Center 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 East Central Mental Health Center's office. The East Central Mental Health Center will only process complaint forms that are complete.

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

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

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

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

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

*If information is needed in another language, complainant can contact 334-566-6022.

IV. Transit-Related Investigations, Complaints, and Lawsuits

The East Central Mental Health Center shall maintain a log of Title VI complaints received. The log shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken in response to the complaint. Any transit related Title VI active investigations and lawsuits shall also be included in this log. This log shall be included in the Title VI Program that is submitted to ALDOT every three years.

There have been no Title VI transit-related investigations, complaints, or lawsuits received by the East Central Mental Health Center. A copy of the Title VI Transit Investigations, Complaints, and Lawsuits Form that will be used if a complaint or lawsuit is filed can be found in Appendix C.

V. Public Participation Plan

The East Central Mental Health Center's Federal Financial Assistance as authorized under Section 5310 of the Federal Transit Act Amendments of 1991 is committed to providing opportunities for elderly individuals with special needs and individuals with disabilities participation in the transportation decision making process. Additionally, all individuals who access the transportation services are offered every opportunity to offer comments and opinions concerning the transportation program. These opportunities are open to everyone including minority, low-income, and the Limited English Proficiency (LEP) populations. The Participation Plan provides for an open exchange of information and ideas between the public and transportation decision makers. The East Central Mental Health Center's public participation program is ongoing and reviewed regularly in order to identify, meet, and serve the community's needs.

In an effort to more fully integrate the opinions of the elderly with special needs and individuals with disabilities, minority, low-income, and LEP populations into community outreach activities, the East Central Mental Health Center's public participation program will:

- Provide opportunities for public participation through means other than written communication, such as personal interviews or the use of recording devices to capture oral comments.
- Ensure that the decision making process adequately considers the issues and concerns raised by the elderly with special needs, individuals with disabilities, minority, low-income, and LEP populations.

To date, the East Central Mental Health Center has participated in public outreach and involvement activities;

- Staff members participate in programs and support community based program for the disadvantage.
- Staff picks up consumers at their homes and transports them to the center and returns them to their home.

- Public notice is posted on the East Central Mental Health website, in reception areas and on buses.

VI. Limited English Proficient Plan

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

- A. The number or proportion of LEP persons eligible to be served or likely to be encountered by the East Central Mental Health Center's program. In addition to the number or proportion of LEP persons served, the analysis identified:
 1. How LEP persons interact with the East Central Mental Health Center staff;
 2. Where LEP communities are located and the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
 3. The literacy skills of LEP populations in their native languages in order to determine whether document translation will be an effective practice; and
 4. Whether or not LEP persons are underserved by the East Central Mental Health Center due to language barriers.
- B. The frequency with which LEP persons come into contact with the program. The following areas were evaluated:
 1. Bus Drivers
 2. Bus service users
 3. Customer service interactions
 4. Receptionist
- C. The nature and importance of the East Central Mental Health Center's program to people's lives.
- D. The resources available for LEP outreach and the costs associated with that outreach.

The East Central Mental Health Center has developed a Limited English Proficiency Plan which is located in Appendix D. It includes:

- Results of the Four Factor Analysis, including a description of the LEP population(s) served;
- A description of how language assistance services will be provided;
- The methods used by the East Central Mental Health Center 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 East Central Mental Health Center has identified that no language groups exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be served by the program. The East Central Mental Health Center 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 will be available in Spanish. The East Central Mental Health Center also provides free translation services upon request.

VII. Minority Representation on Planning and Advisory Bodies

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

VIII. Guidance on Determining Site or Location of Facilities

The East Central Mental Health Center has no construction projects scheduled. In the event that the East Central Mental Health Center decides to acquire land and/or construct facilities, the East Central Mental Health Center shall not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any transit federally funded program based on the grounds of race, color, or national origin. The East Central Mental Health Center shall comply with all federal requirements including 49 CFR Part 21 and FTA Circular

4702.1B and all subsequent provisions.

The East Central Mental Health Center will complete a Title VI equity analysis during the planning state of any new facility with regard to where it is to be located or sited to ensure the location is selected without regard to race, color, or national origin. Wherever necessary, needed, and/or required, the East Central Mental Health Center will engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis will compare the equity impacts of various alternatives and will occur before the selection of preferred sites. A copy of the Title VI Construction Project Analysis can be found in Appendix F.

IX. Additional Title VI Information

Additional Title VI information is included in Appendix G.

X. Board Meeting Resolution of Approved Title VI Program

The East Central Mental Health Center Board of Directors approved the Title VI program. 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

East Central Mental Health Center 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
East Central Mental Health Center.

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

**East Central Mental Health Center
200 Cherry Street Troy AL 36081
334-566-6022**

www.eastcentralmhc.org

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

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

If information is needed in another language, then contact
334-566-6022.

Appendix B

Title VI Complaint Form

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

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

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

Signature and date required below

 Signature

 Date

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

Don Schofield, Executive Director
 East Central Mental Health Center
 200 Cherry Street Troy AL 36081

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
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				

None at this time.

Appendix D

Demographics

**State of Alabama
 Language Spoken At Home per County
 Speak English less than "very well"
 Based on Census 2010 Data and
 2007-2011 American Community Survey**

Area Name	Population 5 Years and Older	# Population		# Speak Spanish or Spanish/ Creole		# Speak Other Indo European		# Speak Other Indo European Island		# Speak Other Asian- Pacific Island	
		Speak English Less Than Very Well	% Population Speak English Less Than Very Well	Speak English Less Than Very Well	% Speak Spanish or Spanish/ Creole Less Than Very Well	Speak English Less Than Very Well	% Speak Other Indo European Less Than Very Well	Speak English Less Than Very Well	% Speak Other Indo European Island Less Than Very Well	Speak English Less Than Very Well	% Speak Other Asian- Pacific Island Less Than Very Well
State of Alabama	4,443,763	105,317	2.40%	78,394	1.80%	7,446	0.20%	17,119	0.40%	2,358	0.10%
County											
Autauga	50,376	543	1.10%	333	0.70%	49	0.10%	144	0.30%	17	0.00%
Baldwin	168,414	4,100	2.40%	2,963	1.80%	445	0.30%	639	0.40%	53	0.00%
Barbour	25,877	519	0.20%	397	1.50%	26	0.10%	96	0.40%	-	0.00%
Bibb	21,439	172	0.80%	123	0.60%	-	0.00%	49	0.20%	-	0.00%
Blount	53,539	2,243	4.20%	2,143	4.00%	77	0.10%	23	0.00%	-	0.00%
Bullock	10,206	321	3.10%	321	3.10%	-	0.00%	-	0.00%	-	0.00%
Butler	19,512	111	0.60%	51	0.30%	19	0.10%	41	0.20%	-	0.00%
Calhoun	110,409	1,902	1.70%	1,516	1.40%	162	0.10%	200	0.20%	24	0.00%
Chambers	32,366	209	0.60%	138	0.40%	22	0.10%	49	0.20%	-	0.00%
Cherokee	24,515	67	0.30%	26	0.1%	-	0.00%	23	0.10%	18	0.10%
Chilton	40,445	1,436	3.60%	1,358	3.40%	16	0.00%	56	0.10%	6	0.00%
Choctaw	13,178	10	0.10%	10	0.00	-	0.00%	-	0.00%	-	0.00%
Clarke	24,522	59	0.20%	24	0.10%	-	0.00%	35	0.10%	-	0.00%
Clay	13,211	255	1.90%	244	1.80%	11	0.10%	-	0.00%	-	0.00%
Cleburne	13,942	159	1.10%	159	1.10%	-	0.00%	-	0.00%	-	0.00%
Coffee	45,929	1,403	3.10%	1,051	2.30%	59	0.10%	293	0.60%	-	0.00%
Colbert	51,362	640	1.20%	561	1.10%	24	0.00%	55	0.10%	-	0.00%
Conecuh	12,488	51	0.40%	51	0.40%	-	0.00%	-	0.00%	-	0.00%
Coosa	10,753	57	0.50%	37	0.30%	20	0.20%	-	0.00%	-	0.00%
Covington	35,464	418	1.20%	279	0.80%	20	0.10%	119	0.30%	-	0.00%
Crenshaw	13,085	214	1.60%	108	0.80%	-	0.00%	106	0.80%	-	0.00%
Cullman	75,324	1,721	2.30%	1,441	1.90%	84	0.10%	193	0.30%	3	0.00%
Dale	46,237	1,066	2.30%	751	1.60%	51	0.10%	233	0.50%	31	0.10%
Dallas	40,663	218	0.50%	108	0.30%	94	0.20%	13	0.00%	3	0.00%
DeKalb	65,522	4,260	6.50%	4,193	6.40%	8	0.00%	4	0.00%	55	0.10%
Elmore	73,825	1,210	1.60%	897	1.20%	146	0.20%	167	0.20%	-	0.00%

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Escambia	35,700	178	0.50%	131	0.40%	34	0.10%	13	0.00%	-	0.00%
Etowah	97,968	1,553	1.60%	1,102	1.10%	120	0.10%	240	0.20%	91	0.10%
Fayette	16,414	87	0.50%	44	0.30%	19	0.10%	24	0.10%	-	0.00%
Franklin	29,352	2,336	8.00%	2,314	7.90%	22	0.10%	-	0.00%	-	0.00%
Geneva	25,078	395	1.60%	369	1.50%	-	0.00%	26	0.10%	-	0.00%
Greene	8,623	7	0.10%	7	0.10%	-	0.00%	-	0.00%	-	0.00%
Hale	15,035	58	0.40%	13	0.10%	5	0.00%	20	0.10%	20	0.10%
Henry	16,304	244	1.50%	81	0.50%	104	0.60%	59	0.40%	-	0.00%
Houston	93,681	1,304	1.40%	890	1.00%	129	0.10%	250	0.30%	35	0.00%
Jackson	50,342	469	0.90%	430	0.90%	-	0.00%	37	0.10%	2	0.00%
Jefferson	613,744	16,987	2.80%	13,300	2.20%	1,040	0.20%	2,079	0.30%	568	0.10%
Lamar	13,776	38	0.30%	35	0.30%	-	0.00%	3	0.02%	-	0.00%
Lauderdale	87,144	1,093	1.30%	816	0.90%	35	0.00%	214	0.20%	28	0.00%
Lawrence	32,127	140	0.40%	137	0.40%	-	0.00%	3	0.00%	-	0.00%
Lee	129,482	4,013	3.10%	1,972	1.50%	406	0.30%	1,524	1.20%	111	0.10%
Limestone	75,692	2,110	2.80%	1,818	2.40%	160	0.20%	132	0.20%	-	0.00%
Lowndes	10,825	49	0.50%	35	0.30%	14	0.10%	-	0.00%	-	0.00%
Macon	20,379	121	0.60%	105	0.50%	13	0.10%	3	0.00%	-	0.00%
Madison	308,736	8,169	2.60%	4,984	1.60%	1,013	0.30%	2,049	0.70%	123	0.00%
Marengo	19,821	40	0.20%	25	0.10%	15	0.10%	-	0.00%	-	0.00%
Marion	28,954	439	1.50%	414	1.40%	20	0.10%	5	0.00%	-	0.00%
Marshall	85,278	6,413	7.50%	5,892	6.90%	107	0.10%	241	0.30%	173	0.20%
Mobile	382,340	8,167	2.10%	3,811	0.10%	999	0.30%	2,908	0.80%	449	0.10%
Monroe	21,752	181	0.80%	153	0.70%	7	0.00%	21	0.10%	-	0.00%
Montgomery	213,095	6,125	2.90%	3,616	1.70%	451	0.20%	1,738	0.80%	320	0.20%
Morgan	110,957	4,869	4.40%	4,463	4.00%	122	0.10%	284	0.30%	-	0.00%
Perry	9,914	105	1.10%	90	0.90%	5	0.10%	10	0.10%	-	0.00%
Pickens	18,564	212	1.10%	201	1.10%	11	0.10%	-	0.00%	-	0.00%
Pike	30,616	672	2.20%	269	0.90%	44	0.10%	359	1.20%	-	0.00%
Randolph	21,500	436	2.00%	403	1.90%	33	0.20%	-	0.00%	-	0.00%
Russell	48,754	424	0.90%	321	0.70%	72	0.10%	31	0.10%	-	0.00%
St. Clair	76,816	972	1.30%	625	0.80%	61	0.10%	286	0.40%	-	0.00%
Shelby	178,619	6,441	3.60%	5,044	2.80%	462	0.30%	892	0.50%	43	0.00%
Sumter	12,946	49	0.40%	8	0.10%	32	0.20%	-	0.00%	9	0.10%
Talladega	77,297	812	1.10%	670	0.90%	20	0.00%	86	0.10%	36	0.00%
Tallapoosa	39,160	590	1.50%	510	1.30%	70	0.20%	10	0.00%	-	0.00%
Tuscaloosa	180,060	4,925	2.70%	3,373	1.90%	428	0.20%	988	0.50%	136	0.10%
Walker	63,292	550	0.90%	489	0.80%	16	0.00%	45	0.10%	-	0.00%
Washington	16,522	58	0.40%	57	0.30%	-	0.00%	1	0.00%	-	0.00%
Wilcox	11,158	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%
Winston	23,323	122	0.50%	94	0.40%	24	0.10%	-	0.00%	4	0.00%

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

200 Cherry Street
Troy, Alabama 36081
334-566-6022
www.eastcentralmhc.org

Introduction

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

Plan Summary

The East Central Mental Health Center has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access transit services provided by the East Central Mental Health Center. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how the East Central Mental Health Center identifies a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how LEP persons are notified that assistance is available.

In order to prepare this plan, the East Central Mental Health Center undertook the U.S. DOT Four Factor Analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a East Central Mental Health Center program, activity, or service.
2. The frequency with which LEP persons come into contact with the East Central Mental Health Center's programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the East Central Mental Health Center to the LEP population.
4. The resources available to the East Central Mental Health Center and the overall cost to provide LEP assistance.

Four Factor Analysis

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an East Central Mental Health Center program, activity, or service.***

The East Central Mental Health Center reviewed the 2010 U.S. Census Report and determined that the total population for Bullock County is 10,206 and 321 (3.10%) residents report speaking English less than very well. Those persons with limited English proficiency are in the following group: 321 speak Spanish or Spanish Creole and 0 speak other languages. The most popular language spoken at home other than English is Spanish. The East Central Mental Health Center 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 the East Central Mental Health Center's programs, activities, or services.***

The East Central Mental Health Center assessed the frequency with which staff and drivers have contact with LEP persons, both presently and in the past. The following contact points and frequencies have been identified:

CONTACT POINTS	FREQUENCY
Bus Drivers	Minimum
Bus service users	Minimum
Customer service interactions	Minimum
Receptionist	Minimum

- 3. The nature and importance of programs, activities, or services provided by the East Central Mental Health Center to the LEP population.***

East Central Mental Health Center operates under Section 5310 of the Federal Transit Act Amendments of 1991 to provide transportation services to meet the needs of elderly individuals and individuals with disabilities.

The largest geographic concentration of LEP individuals in the East Central Mental Health Center's service area are Spanish speaking residents. These residents are often dependent upon our specialized transportation services.

- 4. The resources available to the East Central Mental Health Center and the overall cost to provide LEP assistance.***

The East Central Mental Health Center assessed its resources and determined that funds are available within the current budget for providing LEP assistance. The East Central Mental Health Center 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 East Central Mental Health

Center could partner for outreach and translation efforts was also identified. In addition, bilingual staff, volunteer community agencies, and web based translation services were identified as ways to reduce the cost of translation services.

Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise the East Central Mental Health Center's LEP PLAN:

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

1. Identifying LEP Individuals Requiring Language Assistance

The East Central Mental Health Center identifies an LEP person who requires language assistance by:

- Examining customer service records to identify language assistance that has been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed for similar future situations.
- Regularly surveying drivers and other first line staff who have direct or indirect contact with LEP individuals.
- Assigning a staff person to greet participants as they arrive at East Central Mental Health Center sponsored events. By engaging participants in conversation, it is possible to informally gauge each attendee's ability to speak and understand English.
- Using the Language Identification Flash Card.

2. Providing Language Assistance

The East Central Mental Health Center 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 East Central Mental Health Center's programs and services through these organizations.
- Posting the East Central Mental Health Center's Title VI Notice, Complaint Procedures, Complaint Form, and LEP Plan on the agency's website.
- Identifying in-house staff with other language abilities to assist with translation services.

- Making public notices, publications, and other printed materials (including webpage content) available in other languages.
- Providing a bilingual Community Outreach Coordinator at community events and public hearings.
- Placing statements in notices and publications to notify LEP persons that free language interpreter services are available for meetings with a seven day advance notice.
- Providing language translation for LEP persons in Route Guides.
- Utilizing a web-based translation service application such as Google Translate.
- Utilizing telephone translation services.

3. Training Staff

The East Central Mental Health Center will train staff members on their role and responsibilities in providing meaningful access to services for LEP persons by:

- Developing a curriculum and corresponding PowerPoint to educate staff on the Title VI requirements for providing meaningful access to services for LEP persons.
- Providing staff with a description of language assistance services offered by the East Central Mental Health Center.
- Providing staff with specific procedures to be followed when encountering a LEP person, including how to handle a potential Title VI / LEP complaint.
- Instructing staff on the use of Language Identification Flash Cards.

4. Providing Notice to LEP Persons

The East Central Mental Health Center will provide notice to LEP persons in both oral and written communications by:

- Offering general information, such as operation hours, fares, etc., on the East Central Mental Health Center's customer service line in multiple languages.
- Implementing the use of an automated greeting in both Spanish and English, directing callers to select which language they prefer.

- Providing the following written communications in both English and Spanish:
 - Introduction section of the East Central Mental Health Center's Route Guides which contain information on accessibility and general riding information;
 - Onboard fliers containing information about route changes and rider alerts;
 - Interior bus signage that displays safety or system policy information;
 - Title VI Notice, Complaint Procedures, and Complaint Form.

5. Monitoring and Updating the LEP Plan

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

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

The East Central Mental Health Center will monitor and update its LEP Plan by:

- Determining how the needs of LEP persons have been addressed.
- Determining the current LEP population in the service area and whether the need for translation services has changed.
- Determining whether local language assistance programs have been effective and sufficient to meet the need.
- Determining whether the East Central Mental Health Center's financial resources are sufficient to fund the needed language assistance efforts.
- Determining whether the East Central Mental Health Center has fully complied with the goals of the LEP Plan.
- Determining whether complaints have been received concerning the East Central Mental Health Center's failure to meet the needs of LEP individuals.

Dissemination of the East Central Mental Health Center's LEP Plan

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

- Publishing the LEP Plan and the Title VI Plan on the East Central Mental Health Center's website so that any person or agency with internet access can view and download these plans. Alternatively, any person or agency may also request a copy of the plan at no cost via telephone, fax, mail, or in person. LEP individuals may request that these plans be translated into various languages. If feasible, the East Central Mental Health Center will accommodate such requests.
- Distributing the LEP Plan to human service organizations in the service area.

Questions or comments regarding the LEP Plan may be submitted to the East Central Mental Health Center at the following address:

Don Schofield
200 Cherry Street Troy AL 36081
334-566-6022
www.eastcentralmhc.org

Table Depicting Minority Representation on Planning and Advisory Bodies

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

Appendix E

Appendix F

Title VI Construction Project Analysis

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

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

2. Describe the adverse effects of the project both during and after construction that would affect the identified minority and low-income populations and minority-owned businesses.

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

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

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

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

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

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

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

Appendix 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.

We do not have pending applications.

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.)

We have not had any civil rights compliance reviews in the last three years.

3. Is your agency considered a minority organization: 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 checked="" type="checkbox"/> Other - All centers of this service area

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 checked="" type="checkbox"/> Other – Caucasian

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

No

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

No

If yes, please complete the following items:

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

- b. What did you do to ensure that populations affected by the project and/or service change had meaningful access to and involvement in the development process?

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

Appendix H

Documentation of Title VI Authorization

RESOLUTION ADOPTING A TITLE VI PLAN

WHEREAS, the East Central Mental Health Center is a recipient of federal financial assistance from the Alabama Department of Transportation in support of transit services which imposes certain obligations upon the recipient, including complying with the Title VI federal requirements; and

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

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

NOW, THEREFORE, be it resolved by the Board of Directors of the East Central Mental Health Center as follows:

The Board of Directors approves the proposed Title VI Program in order to comply with the Title VI federal requirements.

The Executive Director, in his capacity, will serve as the Title VI Officer and is authorized to revise and update the plan as necessary.

Adopted this 20th day of October, 2015.

Signature: _____

Attest: _____

Typed Name: _____

Typed Name: _____

Title: _____

Title: _____

Appendix H

Documentation of Title VI Authorization

RESOLUTION ADOPTING A TITLE VI PLAN

WHEREAS, the East Central Mental Health Center is a recipient of federal financial assistance from the Alabama Department of Transportation in support of transit services which imposes certain obligations upon the recipient, including complying with the Title VI federal requirements; and

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

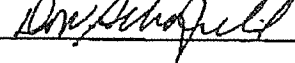
WHEREAS, the East Central Mental Health Center commits to assure that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the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

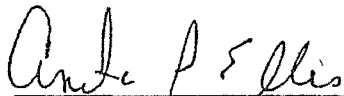
NOW, THEREFORE, be it resolved by the Board of Directors of the East Central Mental Health Center as follows:

The Board of Directors approves the proposed Title VI Program in order to comply with the Title VI federal requirements.

The Executive Director, in his capacity, will serve as the Title VI Officer and is authorized to revise and update the plan as necessary.

Adopted this 20th day of October, 2015.

Signature: 

Attest: 

Typed Name: Don Schofield

Typed Name: Anita S. Ellis

Title: Executive Director

Title: Executive Secretary