

# **CITY OF FLORENCE**

## **TITLE VI PROGRAM**

8/15/2023

**2830 DARBY DR.  
FLORENCE, AL 35630  
256-760-6417  
BJORDAN@FLORENCEAL.ORG  
[HTTPS://FLORENCEAL.ORG/DEPARTMENTS/PARKS\\_&\\_RECREATION/INDEX.PHP](https://florenceal.org/departments/parks_&_recreation/index.php)**

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

## **TABLE OF CONTENTS**

	<u>Page</u>
I. Policy Statement .....	1
II. Notice to the Public .....	1
III. Complaint Procedures and Form .....	1-2
IV. Transit-Related Investigations, Complaints, and Lawsuits .....	3
V. Public Participation Plan .....	3-5
VI. Limited English Proficiency Plan .....	5-6
VII. Minority Representation on Planning and Advisory Bodies .....	6
VIII. Guidance on Determining Site or Location of Facilities .....	7
IX. Additional Title VI Information .....	7
X. Board Meeting Resolution of Approved Title VI Program .....	7

## **APPENDICES**

Appendix A – Title VI Notice to the Public .....	A-1
Appendix B – Title VI Complaint Form .....	B-1
Appendix C – Log of Transit-Related Investigations, Complaints, and Lawsuits .....	C-1
Appendix D – Public Participation Effectiveness Survey .....	D-1
Appendix E – Limited English Proficiency Assessment and Plan .....	E-1
Appendix F – Table Depicting Minority Representation on Planning and Advisory Bodies .....	F-1
Appendix G – Title VI Construction Project Analysis .....	G-1
Appendix H – Additional Title VI Information .....	H-1
Appendix I – Documentation of Title VI Authorization .....	I-1

## I. Policy Statement

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE** in its administration and management of activities related to Title VI. The **CITY OF FLORENCE**'s Title VI Coordinator is **BILL JORDAN, DIRECTOR**, who can be contacted at **256-760-6417** and/or **BJORDAN@FLORENCEAL.ORG**.

## II. Notice to the Public

The **CITY OF FLORENCE** has developed a Title VI Notice to provide information to the public regarding the **CITY OF FLORENCE**'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 **CITY OF FLORENCE** as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The **CITY OF FLORENCE** has posted the Title VI Notice on the City of Florence's website and in public areas of the City of Florence's office 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 **CITY OF FLORENCE** 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 **CITY OF FLORENCE**'s website. If information is needed in another language, the complainant can contact **256-760-6417**. The Statement “If information is needed in another language, contact **256-760-6417**” 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:

**BILL JORDAN  
DIRECTOR  
CITY OF FLORENCE  
2830 DARBY DR.  
FLORENCE, AL 35630  
256-760-6417  
BJORDAN@FLORENCEAL.ORG**

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

The **CITY OF FLORENCE** has 15 business days to investigate the complaint. If more information is needed to resolve the case, the **CITY OF FLORENCE** 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 **CITY OF FLORENCE** 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 the **CITY OF FLORENCE**.

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**

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE** 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. The **CITY OF FLORENCE**'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 **CITY OF FLORENCE**'s 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.**
- **Place public notices in transit vehicles.**
- **Ensure the decision-making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.**
- **Post public participation opportunities on the City of Florence social media sites.**

Join the **City of Florence** at our Public Involvement Meeting for the **Title VI Program in Florence, AL**. You will have an opportunity to share ideas about the proposed project and participate in the planning process. Meet us at **110 W. College Street, Room 116** on **August 15th at 4:00 p.m.**

Public comments are also accepted via mail and e-mail. Comments must be postmarked or timestamped on or before **8/11/2023**.

Send completed comment forms to:  
**bjordan@florenceal.org**

To date, the **CITY OF FLORENCE** has participated in the following public outreach and involvement activities:

- **CITY OF FLORENCE** staff members participated in and supported Community-Based Transportation Programs for disadvantaged communities.
- Public Meetings were held at convenient times and accessible locations for minority, low-income, and LEP populations.
- Meeting notifications have been published in outlets that service minority, low-income, and LEP populations.
- **CITY OF FLORENCE** staff members attended local meetings to identify community needs and to participate as a stakeholder agency.
- **CITY OF FLORENCE** staff members participated in public outreach efforts to explain specific transit proposals and to solicit comments. These outreach efforts included interactions at public open houses and virtual events.
- Public notices were posted on the **CITY OF FLORENCE**'s website, in the receptionist area, and on the transit vehicles.
- Title VI information was developed and distributed in English.
- Notices of public participation opportunities were posted on the **CITY OF FLORENCE**'s social media sites.

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 the **CITY OF FLORENCE**'s 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 the **CITY OF FLORENCE**'s 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 the **CITY OF FLORENCE**'s service area.

## **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 **CITY OF FLORENCE** 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 the **CITY OF FLORENCE**. In addition to the number or proportion of LEP persons served, the analysis identifies:
  - A. How LEP persons interact with the **CITY OF FLORENCE**;
  - 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 **CITY OF FLORENCE** due to language barriers.
2. The frequency with which LEP persons come into contact with the **CITY OF FLORENCE**'s program, activities, or services. The following areas were evaluated:
  - A. Transit user demographics;
  - B. Public meeting participation;
  - C. Customer service interactions in-person, over the phone, and online, (including e-mail and social media);

- D. Rider surveys; and
- E. Operator surveys.
- 3. The nature and importance of programs, activities, or services provided by the **CITY OF FLORENCE** to people's lives.
- 4. The resources available to the **CITY OF FLORENCE** for outreach to LEP persons and the costs associated with that outreach.

The **CITY OF FLORENCE** 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 the **CITY OF FLORENCE** 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 **CITY OF FLORENCE** identified no 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.

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

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE** does not have transit-related non-elected planning boards, advisory councils, or committees that are selected by the **CITY OF FLORENCE**.

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

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

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE** 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 **CITY OF FLORENCE City Council** approved the Title VI Program on **7/10/2023**. 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

**CITY OF FLORENCE** 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 **CITY OF FLORENCE**.

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

**CITY OF FLORENCE**  
2860 Darby Dr.  
Florence, AL 35630  
256-760-6417  
[bjordan@florenceal.org](mailto:bjordan@florenceal.org)

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 Avenue, SE  
Washington, DC 20590

[FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)

If information is needed in another language,  
contact 256-760-6417.

# Appendix B

## Title VI Complaint Form

<b>Section I</b>	
Name:	
Address:	
Phone (Home or Cell):	Phone (Work):
E-mail:	
<b>Section II</b>	
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 <b>Section III</b> .	
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	
<b>Section III</b>	
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.	
_____	
_____	
_____	
_____	
_____	
_____	
_____	
_____	

<b>Section IV</b>	
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Section V</b>	
Have you filed this complaint with any other Federal, AL, or local agency, or with any Federal or AL 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: _____
<input type="checkbox"/> Court: _____	<input type="checkbox"/> Local agency: _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Address:	
Agency:	
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 using the contact information below:

**Bill Jordan**  
**CITY OF FLORENCE**  
**2830 DARBY DR.**  
**FLORENCE, AL 35630**  
**BJORDAN@FLORENCEAL.ORG**

## Appendix C

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

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

## Appendix D

### Public Participation Effectiveness Survey

Date of Public Involvement Activity or Event:  
Transit Project:

Thank you for participating in our planning process! Your engagement helps the **CITY OF FLORENCE** 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.

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• I understand the purpose of the project.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• Everyone who wanted to speak was given time to do so.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• 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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• Resources (translation services, materials in the languages of the affected communities, etc.) were provided to persons with limited English proficiency.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• The public involvement process increased my trust of the agencies involved in the project.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• Overall, I am satisfied with this public involvement activity or event.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

LANGUAGE SPOKEN AT HOME		
<b>Note: The table shown may have been modified by user selections. Some information may be missing.</b>		
<b>DATA NOTES</b>		
TABLE ID:	S1601	
SURVEY/PROGRAM:	American Community Survey	
VINTAGE:	2021	
DATASET:	ACSST5Y2021	
PRODUCT:	ACS 5-Year Estimates Subject Tables	
UNIVERSE:	None	
FTP URL:	None	
API URL:	<a href="https://api.census.gov/data/2021/acs/acs5/subject">https://api.census.gov/data/2021/acs/acs5/subject</a>	
<b>USER SELECTIONS</b>		
GEOS	Florence city, Alabama	
TOPICS	Language Spoken at Home	
<b>EXCLUDED COLUMNS</b>		
	Florence city, Alabama!!Total!!Margin of Error	
	Florence city, Alabama!!Percent!!Margin of Error	
	Florence city, Alabama!!Percent of specified language speakers!!Speak English only or speak English "very well"!!Margin of Error	
	Florence city, Alabama!!Percent of specified language speakers!!Percent speak English only or speak English "very well"!!Margin of Error	
	Florence city, Alabama!!Percent of specified language speakers!!Speak English less than "very well"!!Margin of Error	
	Florence city, Alabama!!Percent of specified language speakers!!Percent speak English less than "very well"!!Margin of Error	
<b>APPLIED FILTERS</b>		
	None	

<b>APPLIED SORTS</b>	None
<b>PIVOT &amp; GROUPING</b>	
PIVOT COLUMNS	None
PIVOT MODE	Off
ROW GROUPS	None
VALUE COLUMNS	None
<b>WEB ADDRESS</b>	<a href="https://data.census.gov/table?t=Language+Spoken+at+Home&amp;g=1600000US0126896&amp;tid=ACST5Y2021.S1601&amp;moe=false">https://data.census.gov/table?t=Language+Spoken+at+Home&amp;g=1600000US0126896&amp;tid=ACST5Y2021.S1601&amp;moe=false</a>
<b>TABLE NOTES</b>	
	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.
	Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.  Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.
	Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates
	Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.

	<p>The 2017-2021 American Community Survey (ACS) data generally reflect the March 2020 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.</p>
	<p>Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.</p>
	<p>Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution. For a 5-year median estimate, the margin of error associated with a median was larger than the median itself. N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available. median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-") median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+"). ** The margin of error could not be computed because there were an insufficient number of sample observations. *** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution. ***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.</p>
<p><b>COLUMN NOTES</b></p>	<p>None</p>

Florence city, Alabama						
	Total	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over	37,581	(X)	36,295	96.6%	1,286	3.4%
Speak only English	35,124	93.5%	(X)	(X)	(X)	(X)
Speak a language other than English	2,457	6.5%	1,171	47.7%	1,286	52.3%
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>						
Spanish	1,600	4.3%	758	47.4%	842	52.6%
5 to 17 years old	491	1.3%	332	67.6%	159	32.4%
18 to 64 years old	1,049	2.8%	385	36.7%	664	63.3%
65 years old and over	60	0.2%	41	68.3%	19	31.7%
Other Indo-European languages	347	0.9%	229	66.0%	118	34.0%
5 to 17 years old	36	0.1%	24	66.7%	12	33.3%
18 to 64 years old	237	0.6%	131	55.3%	106	44.7%
65 years old and over	74	0.2%	74	100.0%	0	0.0%
Asian and Pacific Island languages	418	1.1%	106	25.4%	312	74.6%
5 to 17 years old	69	0.2%	12	17.4%	57	82.6%
18 to 64 years old	334	0.9%	94	28.1%	240	71.9%
65 years old and over	15	0.0%	0	0.0%	15	100.0%
Other languages	92	0.2%	78	84.8%	14	15.2%
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	85	0.2%	71	83.5%	14	16.5%
65 years old and over	7	0.0%	7	100.0%	0	0.0%
<b>CITIZENS 18 YEARS AND OVER</b>						
All citizens 18 years old and over	30,965	(X)	30,605	98.8%	360	1.2%
Speak only English	30,009	96.9%	(X)	(X)	(X)	(X)
Speak a language other than English	956	3.1%	596	62.3%	360	37.7%
Spanish	659	2.1%	384	58.3%	275	41.7%
Other languages	297	1.0%	212	71.4%	85	28.6%

# LIMITED ENGLISH PROFICIENCY PLAN

## CITY OF FLORENCE

2830 DARBY DR.  
FLORENCE, AL 35630  
256-760-6417

[BJORDAN@FLORENCEAL.ORG](mailto:BJORDAN@FLORENCEAL.ORG)

[HTTPS://FLORENCEAL.ORG/DEPARTMENTS/PARKS\\_&\\_RECREATION/INDEX.PHP](https://florenceal.org/departments/parks_&_recreation/index.php)

## **Introduction**

This Limited English Proficiency Plan was prepared to address the **CITY OF FLORENCE**'s 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**

The **CITY OF FLORENCE** 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 the **CITY OF FLORENCE**. 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 **CITY OF FLORENCE** 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 **CITY OF FLORENCE** 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 the **CITY OF FLORENCE**
2. The frequency with which LEP persons come into contact with the **CITY OF FLORENCE**'s programs, activities, or services
3. The nature and importance of programs, activities, or services provided by the **CITY OF FLORENCE** to people's lives
4. The resources available to the **CITY OF FLORENCE** 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 the CITY OF FLORENCE**

The **CITY OF FLORENCE** reviewed the 2021 U.S. Census Report and determined that the total population for **FLORENCE** is **37,581**. Of those persons, **1256** (3.4%) residents report speaking English less than very well. Those persons with limited English proficiency speak the following languages at home: **842** speak Spanish, **118** speak other Indo-European languages, **312** speak Asian and Pacific Island languages, and **14** speak other languages. The most popular language spoken at home (other than English) is **Spanish**. The **CITY OF FLORENCE** 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 CITY OF FLORENCE’s programs, activities, or services**

The **CITY OF FLORENCE** 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:

<b>Contact Points</b>	<b>Frequency (Low, Medium, or High)</b>
Transit user demographics	<b>H</b>
Public meeting participation	<b>M</b>
Customer service interactions in-person, over the phone, and online, (including e-mail and social media)	<b>L</b>
Rider surveys	<b>L</b>
Operator surveys	<b>L</b>
Transit user demographics	<b>NA</b>
Website	<b>NA</b>
Social Media	<b>NA</b>
Receptionist	<b>NA</b>
Field Supervisors	<b>NA</b>
Annual Programs, Activities, and Events	<b>NA</b>

**3. The nature and importance of programs, activities, or services provided by the CITY OF FLORENCE to people’s lives**

The Title VI programs, activities, and services provided by the City of Florence are an important asset to the citizens we serve. The transportation services are used to serve meals and provide a reliable mode of transportation to the citizens of Florence. It is very important that the City of Florence offer the Title IV program to the citizens who will most likely benefit from the program.

**4. The resources available to the CITY OF FLORENCE for outreach to LEP persons and the costs associated with that outreach**

The **CITY OF FLORENCE** assessed its resources and determined that funds are available within the current budget for providing language assistance. The **CITY OF FLORENCE** 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 **CITY OF FLORENCE** 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 the **CITY OF FLORENCE**'s 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**

The **CITY OF FLORENCE** identifies an LEP person who requires language assistance by:

- Examining customer service records to identify language assistance that was 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;
- Regularly 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 the **CITY OF FLORENCE**. By engaging participants in conversation, staff may informally gauge each attendee's ability to speak and understand English.

#### **2. Provide Language Assistance**

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE**'s programs and services through these organizations; and
- Providing Language Identification information onboard the **CITY OF FLORENCE**'s fleet, in field supervisor vehicles, at the administrative office, and at public meetings.

### 3. Train Staff

The **CITY OF FLORENCE** will train staff members on their roles and responsibilities in providing meaningful access to services for LEP persons by:

- Developing a curriculum and corresponding presentation 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 **CITY OF FLORENCE**;
- 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

The **CITY OF FLORENCE** will provide notice to LEP persons in both oral and written communications by:

- Providing the following written communications in both English and **Spanish**:
  - Introduction section of the **CITY OF FLORENCE**'s general riding information;
  - Fliers onboard the **CITY OF FLORENCE**'s fleet containing information about special promotions and campaigns;
  - 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.

The **CITY OF FLORENCE** 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 **CITY OF FLORENCE**'s service area, and/or during the process of updating the **CITY OF FLORENCE**'s Title VI Program.

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

#### **Dissemination of the CITY OF FLORENCE's 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 City of **CITY OF FLORENCE**'s website so that any person or City of Florence 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, the **CITY OF FLORENCE** 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 **CITY OF FLORENCE** using the following contact information:

**Bill Jordan**  
**2830 DARBY DR.**  
**FLORENCE, AL 35630**  
**256-760-6417**  
**BJORDAN@FLORENCEAL.ORG**  
**[HTTPS://FLORENCEAL.ORG/DEPARTMENTS/PARKS & RECREATION/INDEX.PHP](https://florenceal.org/departments/parks_%20recreation/index.php)**



---

---

---

---

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. **NA**
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.)  
**NA**

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

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

- |  |   |
|--|---|
| <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. **NA**

- |  |   |
|--|---|
| <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.

Bill Jordan 2830 Darby Dr. Florence, AL 35630 256-760-6417

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: **NA**

- 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?

# Appendix I

## Documentation of Title VI Authorization

### RESOLUTION ADOPTING A TITLE VI PROGRAM

**WHEREAS**, the CITY OF FLORENCE 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 CITY OF FLORENCE 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 CITY COUNCIL of the CITY OF FLORENCE as follows:

The COUNCIL approves the proposed Title VI Program in order to comply with the Title VI Federal requirements.

The **Director of Parks & Recreation**, 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 15<sup>th</sup> day of **August, 2023**.

Signature: \_\_\_\_\_

Attest: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title \_\_\_\_\_