

City of Roanoke

TITLE VI PROGRAM

September 12, 2022

**P.O. Box 1270
Roanoke Alabama 36274
334-863-4129
tjacobs@roanokealabama.org
Roanokealabama.org**

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

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I. Policy Statement

The City of Roanoke 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 Roanoke in its administration and management of activities related to Title VI. The City of Roanoke’s Title VI Coordinator is Tim Jacobs, Purchasing Agent, who can be contacted at 334-863-4129 and/or tjacobs@roanokealabama.org

II. Notice to the Public

The City of Roanoke has developed a Title VI Notice to provide information to the public regarding the city of Roanoke’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 Roanoke as well as information to file a complaint directly with the Federal Transit Administration (FTA).

The City of Roanoke has posted the Title VI Notice on the agency’s website and in public areas of the agency’s office 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. The City of Roanoke 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 Roanoke's website. If information is needed in another language, the complainant can contact 334-863-4129. The statement "If information is needed in another language, contact 334-863-4129 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:

**Tim Jacobs
Purchasing Agent
City of Roanoke
P.O. Box 1270
Roanoke Alabama 36274
334-863-4129
tjacobs@roanokealabama.org**

Once the complaint is received, the city of Roanoke 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 Roanoke's office. The City of Roanoke 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 City of Roanoke. Under these circumstances, the complainant will be interviewed and the City of Roanoke will assist the complainant in converting the verbal allegations to a formal written complaint.

The City of Roanoke has 15 business days to investigate the complaint. If more information is needed to resolve the case, the City of Roanoke 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 Roanoke 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 Roanoke.

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 Roanoke 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 Roanoke 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 Roanoke'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 Roanoke'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 on the City of Roanoke website, and on transit vehicles.
- Utilize the media (social media 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.
- Ensure the decision-making process adequately considers the issues and concerns raised by minority, low-income, and LEP populations.
- Develop transit and Title VI information in English and other languages as needed.
- Make public information available in electronically accessible formats.
- Host a table or booth at community events or piggyback engagement efforts onto regularly scheduled community meetings.
- Use non-traditional media outlets to solicit input, such as local neighborhood publications, and online outlets like YouTube, Twitter, Instagram, and Facebook.
- Post public participation opportunities on the City of Roanoke's social media sites. A sample template is shown below.

Join the City of Roanoke at our Public Involvement Meeting for the Title VI Program in Roanoke City Library. You will have an opportunity to share ideas about the proposed project and participate in the planning process. Meet us at **<736 College Street>** on **<DATE>** at **<TIME>**.

Public comments are also accepted via mail and e-mail. Comments must be postmarked or timestamped on or before **<DATE>**.

Please find the online comment form at **<WEBSITE>**.

Send completed comment forms to:

<E-MAIL ADDRESS>

or

<AGENCY>

Attn: **<NAME>**

<ADDRESS>

To date, the City of Roanoke has participated in the following public outreach and involvement activities:

- City of Roanoke staff members participated in and supported Community-Based Transportation Programs for disadvantaged communities.
- City of Roanoke staff members participated in public outreach efforts to explain specific transit proposals and to solicit comments.
- The City of Roanoke has partnered with the East Alabama Regional Planning and Development Commission and the local Alabama Department of Public Health to identify disadvantaged people.
- The City of Roanoke uses its website to inform the public about activities and events.
- The transit bus has the name and phone number of the City of Roanoke posted on the outside.

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 Roanoke'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 Roanoke'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 Roanoke's 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 the City of Roanoke 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 Roanoke. In addition to the number or proportion of LEP persons served, the analysis identifies:

- A. How LEP persons interact with the City of Roanoke;
 - 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 Roanoke due to language barriers.
2. The frequency with which LEP persons come into contact with the City of Roanoke'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 Roanoke to people's lives.
4. The resources available to the City of Roanoke for outreach to LEP persons and the costs associated with that outreach.

The City of Roanoke 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 Roanoke 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 Roanoke identified the following language group which exceed the threshold of 1,000 persons or 5%, whichever is less, of the total population eligible to be served by the program

VII. Minority Representation on Planning and Advisory Bodies

The City of Roanoke 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 Roanoke does not have transit-related non-elected planning boards, advisory councils, or committees that are selected by The City of Roanoke. If the City of Roanoke 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, the City of Roanoke 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 Roanoke shall comply with all Federal requirements including 49 CFR Part 21 and FTA Circular 4702.1B and subsequent provisions.

The City of Roanoke 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 Roanoke 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 Roanoke City Council approved the Title VI Program on September 12, 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

The City of Roanoke 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.

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

**City of Roanoke
809 Main Street
Roanoke, Alabama 36274
334-863-4129
tjacobs@roanokealabama.org**

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 334-863-4129. ***

Title VI Notice to the Public in Spanish

(This notice shall be posted on the agency's website and in all transit vehicles, stations, stops, receptionist areas, and/or meeting rooms if provider meets the Safe Harbor Threshold and Spanish is a language spoken by LEP populations that meet the threshold.)

TÍTULO VI AVISO DE PROTECCIÓN CONTRA LA DISCRIMINACIÓN

Té City of Roanoke opera sus programas sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier acto ilícito práctica discriminatoria bajo el Título VI puede presentar una queja ante la City of Roanoke

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

**City of Roanoke
809 main Street
Roanoke, Alabama 3274
334-863-4129
tjacobs@roanokealabama.org**

Se puede presentar una denuncia directamente ante el Administración Federal de Tránsito poniéndose en contacto con:

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

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:

Tim Jacobs
 City of Roanoke
 P.O. Box 1270
Roanoke, Alabama 36274
tjacobs@roanokealabama.org

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 City of Roanoke 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.

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

Transit Provider:	City of Roanoke			
Date Completed:	9-2-22			
<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
5695	5,695	42	0.7%	42
Totals	5,695	42	0.7	
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

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

LANGUAGE SPOKEN AT HOME		
Note: The table shown may have been modified by user selections. Some information may be missing.		
DATA NOTES		
TABLE ID:	S1601	
SURVEY/PROGRAM:	American Community Survey	
VINTAGE:	2020	
DATASET:	ACSST5Y2020	
PRODUCT:	ACS 5-Year Estimates Subject Tables	
UNIVERSE:	None	
FTP URL:	None	
API URL:	https://api.census.gov/data/2020/acs/acs5/subject	
USER SELECTIONS		
GEOS	Roanoke city, Alabama	
TOPICS	Language Spoken at Home	
EXCLUDED COLUMNS		
	Roanoke city, Alabama!!Total!!Margin of Error	
	Roanoke city, Alabama!!Percent!!Margin of Error	
	Roanoke city, Alabama!!Percent of specified language speakers!!Speak English only or speak English "very well"!!Margin of Error	

	Roanoke city, Alabama!!Percent of specified language speakers!!Percent speak English only or speak English "very well"!!Margin of Error
	Roanoke city, Alabama!!Percent of specified language speakers!!Speak English less than "very well"!!Margin of Error
	Roanoke city, Alabama!!Percent of specified language speakers!!Percent speak English less than "very well"!!Margin of Error
APPLIED FILTERS	None

APPLIED SORTS	None
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PIVOT & GROUPING	None
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WEB ADDRESS	https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&g=1600000U0165040&tid=ACST5Y2020.S1601&moe=false
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TABLE NOTES	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2020, the 2020 Census provides the official counts of the population and housing units for the nation, states, counties, cities, and towns. For 2016 to 2019, the Population Estimates Program provides estimates of the population for the nation, states, counties, cities, and towns and intercensal housing unit estimates for the nation, states, and counties.
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	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.
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	Source: U.S. Census Bureau, 2016-2020 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.
	The 2016-2020 American Community Survey (ACS) data generally reflect the September 2018 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.

	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.
	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.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.

COLUMN NOTES	None
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Roanoke 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	5,695	(X)	5,653	99.3%	42	0.7%
Speak only English	5,653	99.3%	(X)	(X)	(X)	(X)
Speak a language other than English	42	0.7%	0	0.0%	42	100.0%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	42	0.7%	0	0.0%	42	100.0%
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	42	0.7%	0	0.0%	42	100.0%
65 years old and over	0	0.0%	0	-	0	-
Other Indo-European languages	0	0.0%	0	-	0	-
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	0	0.0%	0	-	0	-
Asian and Pacific Island languages	0	0.0%	0	-	0	-
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	0	0.0%	0	-	0	-
Other languages	0	0.0%	0	-	0	-
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	0	0.0%	0	-	0	-
65 years old and over	0	0.0%	0	-	0	-
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	4,750	(X)	4,750	100.0%	0	0.0%
Speak only English	4,750	100.0%	(X)	(X)	(X)	(X)
Speak a language other than English	0	0.0%	0	-	0	-
Spanish	0	0.0%	0	-	0	-
Other languages	0	0.0%	0	-	0	-

LIMITED ENGLISH PROFICIENCY PLAN

City of Roanoke
P.O. Box 1270
Roanoke, Alabama 36274
334-963-4129
tjacobs@roanokealabama.org
Roanokealabama.org

Introduction

This Limited English Proficiency Plan was prepared to address the City of Roanoke'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 Roanoke 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 Roanoke. 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 Roanoke 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 Roanoke 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 Roanoke
2. The frequency with which LEP persons come into contact with the City of Roanoke's programs, activities, or services
3. The nature and importance of programs, activities, or services provided by the City of Roanoke to people's lives
4. The resources available to the City of Roanoke 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 Roanoke.**

The City of Roanoke reviewed the 2020 U.S. Census Report and determined that the total population for **Roanoke** is 5,695. Of those persons, 42, (0.7%) residents report speaking English less than very well. Those persons with limited English proficiency speak the following languages at home: 42 speak Spanish. The most popular language spoken at home (other than English) is Spanish. The City of Roanoke 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 Roanoke programs, activities, or services

The City of Roanoke 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 (<i>Low, Medium, or High</i>)
Drivers – Fixed Route	Low
Drivers – Demand Response	
Information Line	
Dispatchers	Low
Route Guides	
Reservationist	
Website	Low
Social Media	Low
Receptionist	
Field Supervisors	
Annual Programs, Activities, and Events	Low

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

The largest geographic concentration of LEP individuals in the City of Roanoke’s service area communicates by speaking Spanish. These individuals are often dependent upon our specialized transportation services. It is also likely that the City of Roanoke will encounter LEP individuals where tickets are sold and at community outreach events.

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

The City of Roanoke assessed its resources and determined that funds are available within the current budget for providing language assistance. The City of Roanoke 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 Roanoke 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 Roanoke'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 Roanoke 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 Roanoke. 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 Roanoke 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 Roanoke's programs and services through these organizations;
- Implementing a Hispanic Education and Outreach program;
- Posting the City of Roanoke's Title VI Notice, Complaint Procedures, Complaint Form, and Limited English Proficiency Plan on the City of Roanoke's website;
- Providing travel training to LEP persons;
- Identifying in-house staff with other language abilities to assist with translation services;
- Making public notices, publications, and other printed materials (including online content) available in other languages;

- Providing a bilingual or multilingual Community Outreach Coordinator at community events and public hearings;
- Placing statements in notices, publications, and online content to notify LEP persons that free language interpreter services are available for meetings with a seven-day advance notice;
- Providing Language Identification Flash Cards onboard the City of Roanoke's fleet, in field supervisor vehicles, at the administrative office, and at public meetings;
- Providing language translation for LEP persons in Route Guides;
- Utilizing a web-based translation service application such as Google Translate; and
- Utilizing telephone translation services.

3. Train Staff

The City of Roanoke 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 Roanoke.
- 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 Roanoke will provide notice to LEP persons in both oral and written communications by:

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

- Providing the following written communications in both English and Spanish
 - Introduction section of the City of Roanoke’s Route Guides which contains information on fares, accessibility, fare/ticket discounts, and general riding information;
 - Temporary signs at stations/stops and transit centers informing customers of any detours and route changes;
 - Fliers onboard the City of Roanoke’s fleet containing information about route changes, rider alerts, fare increases, and public meetings;
 - Signage that displays safety or system policy information;
 - Interior bus signage displaying cash fare cost of monthly discount passes and special promotions and campaigns; and
 - 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 Roanoke 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 Roanoke’s service area, and/or during the process of updating the City of Roanoke’s Title VI Program.

The City of Roanoke 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 Roanoke’s financial resources are sufficient to fund the needed language assistance efforts;

- Determining whether the City of Roanoke has fully complied with the goals of the Limited English Proficiency Plan; and
- Determining whether complaints were received concerning the City of Roanoke's failure to meet the needs of LEP individuals.

Dissemination of the City of Roanoke'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 Roanoke's 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, the City of Roanoke will accommodate such requests.
- Sharing updates to the Limited English Proficiency Plan on the City of Roanoke's 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 the City of Roanoke using the following contact information:

Tim Jacobs
P.O. Box 1270
Roanoke, Alabama 36274
334-8634129
tjacobs@roanokealabama.org
roanokealabama.org



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



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 ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ. | <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>Ukranian</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>						

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.

The City of Roanoke does not have any pending applications for financial assistance from any Federal agency.

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.)

The City of Roanoke has 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 type="checkbox"/> Black American | <input type="checkbox"/> Sub-Continent Asian-American |
| <input type="checkbox"/> Hispanic American | <input type="checkbox"/> Asian-Pacific American |
| <input type="checkbox"/> Native American | <input type="checkbox"/> Other |

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

Yes No

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

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

Native American

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.

N/A

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 1295

RESOLUTION ADOPTING A TITLE VI PROGRAM

WHEREAS, the City of Roanoke 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

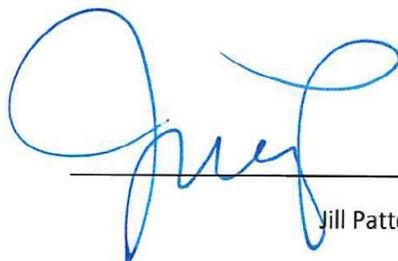
WHEREAS, the City of Roanoke commits to assure that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits of, or 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 Roanoke as follows:

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

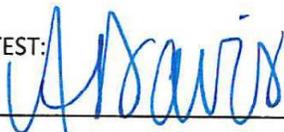
The Purchasing Agent/Zoning Administrator in their capacity, will serve as the Title VI Coordinator and is authorized to revise and update the Title VI program as necessary.

Adopted this 12th day of September, 2022.



Jill Patterson, Mayor

ATTEST:



Amanda Davis, City Clerk