HUNTSVILLE TRANSIT
TITLE VI PROGRAM PLAN

Title VI Plan Update

Adopted by: Resolution No. 15-301
Dated: April 23, 2015

Title VI Program Plan Update
Updated: March 2021

J. Thomas Brown, Jr., Director

4/1/21

Date
RESOLUTION NO. 15-301

WHEREAS, the United States, through the United States Department of Transportation, Federal Transit Administration, under 49 U.S.C., Chapter 32, Title 23, United States Code and other Federal statutes administered by the Federal Transit Administration offers Section 5307 financial aid for operating and capital projects; and

WHEREAS, the City of Huntsville, Alabama, is a beneficiary of such assistance. That pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration’s Circular 4702.1B, recipients of such assistance are required to submit a Title VI Program;

NOW, THEREFORE, BE IT RESOLVED by the City Council of Huntsville, Alabama, that the Mayor, or his designee, in his official capacity, be, and he is hereby authorized and requested to submit the attached Public Transit Title VI Program, consisting of 39 pages, and an executed copy of said document will be permanently kept on file in the Office of the City Clerk of the City of Huntsville, Alabama.

ADOPTED this the 23rd day of April, 2015.

[Signature]
President of the City Council of the City of Huntsville, Alabama

APPROVED this the 23rd day of April, 2015.

[Signature]
Mayor of the City of Huntsville, Alabama
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2 TITLE VI PROGRAM INTRODUCTION

As a recipient of Federal Transit Administration funding, the City of Huntsville, Alabama, Department of Parking & Public Transit (referred to as Huntsville Transit), must comply with Title VI of the Civil Rights Acts of 1964, as amended. This report is submitted in accordance with and pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration’s Circular 4702.1B, recipients of such assistance are required to submit a Title VI Program.

Huntsville Transit establishes this Title VI Nondiscrimination Plan for the purpose of complying with Title VI of the Civil Rights Act of 1964, as required by FTA Circular 4702.1B, and related requirements outlined under Category 1.1 Standard Assurances, (f)(1) “Title VI of the Civil Rights Act of 1964 of the FTA Certifications and Assurances. This document details the nondiscrimination program, policies, and practices administered by this organization, and will be updated periodically to incorporate changes and additional responsibilities as they are made.

The City of Huntsville, Alabama, certify’s the FTA Certifications and Assurances annually. The City of Huntsville Mayor and the City Attorney certified the FTA Certifications and Assurances on March 25, 2021.

No Civil Rights Reviews were performed within the last three years. A joint FHWA/FTA Transportation Management Area (TMA) Review is currently underway. A virtual site visit is scheduled for April 13th through April 14th, 2021.

3 DESCRIPTION OF PROGRAMS AND SERVICES

The Huntsville Transit System is in the Huntsville Area MPO (also known as the Huntsville Area Transportation Study, or HATS) for the Huntsville Urbanized Area, Primary UZA 132. The Huntsville Urbanized Area has a population over 200,000. The Huntsville Transit system operates fewer than 50 Fixed Route vehicles during service. This program meets all system-wide standards and policy requirements for systems operating less than 50 fixed route vehicles. No financial assistance is extended to any sub-recipients related to Federal Transit Administration funds.

3.1 PROGRAMS AND SERVICES ADMINISTERED

Huntsville Transit provides Fixed Route (Orbit) and Paratransit (Access) transportation options to its customers within the City of Huntsville, Alabama. Huntsville Transit operates 13 buses on 10 routes Monday through Thursday, 14 buses on 11 routes on Fridays, and 10 buses on 10 routes on Saturdays. Three bus routes operate on 30-minute headways (Routes 1, 2, and 4). Two routes (Routes 5 & 6) operate on a common corridor with 30-minute headways between downtown and Airport Road in South Huntsville. Five (5) fixed routes operate on a 1-hour headway. The Friday night Route 11 Shopping Shuttle Route operates every 45 minutes. Huntsville Transit provides paratransit services utilizing 19 paratransit vehicles. Huntsville Transit services operate Monday through Friday from 6 a.m. to 9 p.m., and on Saturdays from 7 a.m. to 7 p.m. Fixed route fares are $1 for one-way fare, $0.50 half fare for seniors (65+), disabled citizens, Medicare/Medicaid card holders with valid ID, students with valid ID and children 6 and under. Transfers are free, books of 20 One-way tickets are $18 and monthly passes are $30. Paratransit (Access) fares are $2.00 for one-way fare. Real-time and scheduled next bus arrival times are available from Route Shout 2.0 for Android and Route Shout for Apple apps. Google Transit can provide the quickest bus, bike or walking route to your destination.

Huntsville Transit Access is a radio dispatched and ADA accessible service, specializing in door-to-door demand-response paratransit service. An ADA Paratransit Service Application and reservations made in advance by 5 p.m. the day before is required to schedule this service. Certified Access clients can utilize the free Amble mobile app to make reservations, track rides in real-time, and cancel reservations.
Huntsville Transit has a Director, four managers, four supervisors, three administrative staff, four dispatchers and approximately 22 paratransit drivers and 20 fixed route drivers.

### 3.2 Funding Sources / Tables

For the purpose of federally-assisted programs, "federal assistance" shall include:

- grants of Federal funds;
- the grant or donation of Federal property and interest in property; and
- any Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Each FTA Formula Grant received by our system during the past year, and whether the funds were received through ALDOT or directly from FTA, is checked below.

<table>
<thead>
<tr>
<th>Grant Title</th>
<th>ALDOT</th>
<th>FTA</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>5307 (Urbanized Area Formula)</td>
<td>☐</td>
<td>☒</td>
<td>Annual Formula</td>
</tr>
<tr>
<td>5309 (b)(2) (Fixed Guideway Modernization)</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>5310 (Transportation for Elderly Persons and Persons with Disabilities)</td>
<td>☒</td>
<td>☐</td>
<td>Application to ALDOT for funding as needed for operations or capital.</td>
</tr>
<tr>
<td>5311 (Formula Grants for Other than Urbanized Areas)</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>5311 (b)(3) (Rural Transit Assistance)</td>
<td>☐</td>
<td>☐</td>
<td></td>
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<tr>
<td>5316 (Job Access and Reverse Commute)</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>5303, 5304 and/or 5305 (Metropolitan &amp; Statewide Planning)</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>5339(a) (Bus and Bus Facilities Formula)</td>
<td>☐</td>
<td>☒</td>
<td>Annual Formula</td>
</tr>
<tr>
<td>5339(b) (Bus and Bus Facilities Discretionary)</td>
<td>☐</td>
<td>☒</td>
<td>Competitive Grant.gov grant award 2020</td>
</tr>
</tbody>
</table>

### 3.3 Decision Making Process

The Director of Parking & Public Transit provides leadership, direction, and policy to ensure compliance. The Director makes all departmental, operational, and capital decisions and approvals for plan updates and amendments for Huntsville Transit. The HATS MPO board reviews and adopts all necessary STIP inclusions for grant applications.

<table>
<thead>
<tr>
<th>Board or Committee Name</th>
<th>Appointed</th>
<th>Elected</th>
<th># of Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director of Parking &amp; Public Transit</td>
<td>☒</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>HATS MPO Policy Board</td>
<td>☒</td>
<td>☐</td>
<td>11</td>
</tr>
<tr>
<td>Mayor, City of Huntsville</td>
<td>☐</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>City Council, City of Huntsville</td>
<td>☐</td>
<td>☒</td>
<td>5</td>
</tr>
</tbody>
</table>
3.4 SUB-RECIPIENTS

Huntsville Transit does not have pass through funds to any other organizations or agency and, therefore, does not have any subrecipients.

4 TITLE VI POLICY STATEMENT

The City of Huntsville, Department of Parking & Public Transit, Huntsville Transit, as a federal grant recipient, is required by the Federal Transit Administration (FTA) to conform with Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with Limited English proficiency. The rights of women, the elderly and the disabled are protected under related statutes. These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI.

Huntsville Transit is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with Huntsville Transit or affected by its programs. The City of Huntsville’s commitment includes vigorously enforcing all applicable laws and regulations that affect Huntsville Transit and those organizations, both public and private, which participate and benefit through our programs.

Huntsville Transit will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate.

Huntsville Transit will convey to any sub-recipients and/or contractors that they are required to prevent discrimination and Huntsville Transit will ensure nondiscrimination in all their programs, activities, and services. Huntsville Transit has no sub-recipients currently.

The Director of Parking & Public Transit, Huntsville Transit is responsible for providing leadership, direction, and policy to ensure compliance with Title VI of the 1964 Civil Rights Act for the City of Huntsville’s Transit related functions. Any person(s) or firm(s) who feel that they have been discriminated against is encouraged to report such violations to:

J. Thomas Brown, Jr., Director
City of Huntsville, Department of Parking & Public Transit
500 B Church Street
Huntsville, AL 35801
(256) 427-6811
(256) 427-6869 (fax)

5 PUBLIC NOTIFICATION

Huntsville Transit posts a notice to the public notifying them of their rights under Title VI. At a minimum, nondiscrimination information will be disseminated on the website and on posters in conspicuous areas at our office. The notices have been verified posted at the following locations (Appendix A):

1. Front office, ticket sales area.
2. Transfer point waiting room.
3. City of Huntsville, Huntsville Transit website
6 YOUR SAFEGUARDS UNDER TITLE VI OF CIVIL RIGHTS ACT OF 1964

“No Person in the United States shall, on the grounds 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."

Under Title VI and Executive Order 13166, the Americans with Disabilities Act of 1990 and the Age Discrimination Act of 1975, The City of Huntsville, Alabama, Department of Parking & Public Transit, Huntsville Transit cannot discriminate by:

- Denying program services or benefits.
- Denying persons opportunity to participate in the program through provision of services.
- Providing a different service or benefit or providing them in a manner different from how they are provided to others.
- Subjecting a person to segregation or separate treatment in any manner related to the receipt of any services or benefits under the programs.

If you feel you have been discriminated against based on race, color, national origin (or your limited English proficiency), sex, age, or disability, we encourage you to fill out a Title VI complaint form.

The complaint procedures and complaint forms can be accessed from the City of Huntsville, Alabama, Department of Parking & Public Transit, Huntsville Transit website under FILEING A CIVIL RIGHTS COMPLAINT. Both forms are available below FILEING A CIVIL RIGHTS COMPLAINT at this link:


You can also pick one up at the Ticket Sales/Reception office on the 2nd floor of the Huntsville Transit offices located at 500 B Church Street, Huntsville, AL, 35801, or call 256-427-6811, and request one be mailed, faxed, or emailed to you.

The public Title VI Rights notification is below (Appendix B):
NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

City of Huntsville, Alabama, Huntsville Transit

- The City of Huntsville, Alabama, Huntsville Transit operates its programs and services 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 Huntsville, Alabama, Department of Parking & Public Transit.
- To file a Title VI complaint with Huntsville Transit, you can:
  1) Ask for a nondiscrimination complaint form directly from Huntsville Transit administrative office at 500 B Church Street, Huntsville, AL 35801
  2) Call 256-427-6811 office phone, TDD for the hearing impaired 800-548-2547 (voice), or 800-548-2546 (TTY)
  3) Email the director at tommy.brown@huntsvilleal.gov
  4) Go online to the City of Huntsville, Huntsville Transit Civil Rights site at https://www.huntsvilleal.gov/residents/streets/public-transportation/public-transportation-civil-rights/
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact 256-427-6811.
- Si se necesita información en otro idioma, por favor póngase en contacto con 256-427-6811.

7 TITLE VI COMPLAINT PROCEDURES

This document outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the City of Huntsville, Alabama Department of Transportation, the Secretary of the US Department of Transportation, Equal Employment Opportunity Commission (EEOC), Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance.

7.1 PROCEDURE

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the Director of Parking & Public Transit, Huntsville Transit. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.
2. The complainant may complete the fillable Title VI Complaint Form available at https://huntsvilleal.seamlessdocs.com/f/TitleVIComplaint. Please, attach any significant and related documents, pictures, or file to this form. You can find the attachment button on the upper left corner of the page. Printing the completed form is also available. Please, remember to ‘Submit & Sign’ the form from the lower right-hand corner.
3. The complainant may request the complaint form from the Huntsville Transit offices at 500 B Church Street, Huntsville, AL 35801, or call (256) 427-6811.
4. The complainant may also submit a written statement that contains all the information identified in Section 5 below:
5. The complaint will include the following information:
a. Name, address, and telephone number of the complainant.
b. The basis of the complaint, i.e., race, color, national origin, sex, elderly or disabled.
c. The date or dates on which the alleged discriminatory event or events occurred.
d. The nature of the incident that led the complainant to feel discrimination was a factor.
e. Names, addresses and telephone numbers of persons who may have knowledge of the event.
f. Other agencies or courts where complaint may have been filed and a contact name.
g. Complainant’s signature and date.
h. If the complainant is unable to write a complaint, the Huntsville Transit staff will assist the complainant.
   If requested by complainant, Huntsville Transit will provide a language or sign interpreter.

6. The complaint may be mailed, faxed, or emailed to the following address:

   J. Thomas Brown, Jr., Director
   City of Huntsville, Department of Parking & Public Transit
   500 B Church Street
   Huntsville, AL 35801
   (256) 427-6811
   (256) 427-6869 (fax)
   Tommy.brown@huntsvilleal.gov

7. Complainants have the right to complain directly to the appropriate federal agency however, they must do so
   within one-hundred eighty (180) calendar days of the last alleged incident.

8. Huntsville Transit will begin an investigation within fifteen (15) working days of receipt of a complaint.

9. Huntsville Transit will contact the complainant in writing no later than thirty (30) working days after receipt of
   complaint for additional information, if needed to investigate the complaint. If the complainant fails to provide
   the requested information in a timely basis, Huntsville Transit may administratively close the complaint.

10. Huntsville Transit will complete the investigation within ninety (90) days of receipt of the complaint. A written
    investigation report will be prepared by the investigator. The report shall include a summary description of the
    incident, findings, and recommendations for disposition.

11. The Director will review the report. A closing letter and exit interview will be provided to the complainant. The
    respondent will also receive a copy of the closing letter. Each will have five (5) working days from receipt of the
    report to respond. If either party responds negatively or has additional information to provide, an informal
    meeting will be arranged by the Director of Parking & Public Transit. If neither party responds, the complaint will
    be closed.

12. The investigation report with recommendations and corrective actions taken will be forwarded to the
    appropriate city, state or federal agency, the complainant, and the respondent.

13. Huntsville Transit will advise complainants of their appeal rights to the appropriate federal agency.

8 TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 states "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." Two Executive Orders extend Title VI protections to
Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information necessary to process your complaint. Assistance is available upon request.
Complete this form and mail or deliver to:

   J. Thomas Brown, Jr., Director
   City of Huntsville, Department of Parking & Public Transit
Besides the Title VI Complaint Form below, a fillable Title VI Complaint Form is available online at the City of Huntsville’s website. The site is under ‘Residents’, ‘Streets & Transportation’, ‘Public Transportation’, ‘Public Transportation Civil Rights’, FILING A CIVIL RIGHTS COMPLAINT: https://huntsvilleal.seamlesssdocs.com/f/TitleVIComplaint. The complaint form is below (Appendix C):

City of Huntsville,
Department of Parking & Public Transit
Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states "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." Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to: J. Thomas Brown, Jr., Director, City of Huntsville, Department of Parking & Public Transit, 500 B Church Street, Huntsville, AL 35801.

1. Complainant’s Name: ________________________________

2. Address: _________________________________________

3. City: ________________ State: __________ Zip Code: ________

4. Telephone No. (Home): __________________ (Business): __________________

5. Person discriminated against (if other than complainant)

   Name: ________________________________

   Address: _______________________________

   City: ________________ State: __________ Zip Code: ________

6. What was the discrimination based on? (Check all that apply):

   ______ Race/Color
   ______ National Origin
   ______ Disabili
   ______ Low Income
   ______ Limited English Proficiency

   ______ Sex
   ______ Disability
   ______ Elderly

7. Date of incident resulting in discrimination: ___________________________
8. Describe how you were discriminated against. What happened and who was responsible? For additional space, attach additional sheets of paper or use back of form.


9. Did you file this complaint with another federal, state, or local agency; or with a federal or state court? (Check appropriate space) Yes _________ No _________

If answer is yes, check each agency complaint was filed with:

Federal Agency _________ Federal Court _________ State Agency _________

State Court _________ Local Agency _________ Other _________

10. Provide contact person information for the agency you also filed the complaint with:

Name: ________________________________

Address: ________________________________

City: __________________ State: __________ Zip Code: _________

Date Filed: ________________________________

11. Sign the complaint in space below. Attach any documents you believe supports your complaint.

Complainant's Signature __________________________ Signature Date __________________________

9  TITLE VI COMPLAINT DOCUMENTATION REQUIREMENT

Recipients of Federal financial funds are required to record and report any Transit related Title VI investigations, complaints, and lawsuits.

The City of Huntsville, Alabama, Huntsville Transit will maintain a list of any Huntsville Transit related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of last program submission.

The discrimination complaints log will track a case number, complainant name, respondents name, basis, date filed, date received, actions taken, date investigation complete, and disposition. The complaint log is below (Appendix D):
DISCRIMINATION COMPLAINTS LOG

LOG YEAR(S):

<table>
<thead>
<tr>
<th>Case No.</th>
<th>Complainant Name</th>
<th>Race / Gender</th>
<th>Respondent Name</th>
<th>Basis</th>
<th>Date Filed</th>
<th>Date Received</th>
<th>Action Taken</th>
<th>Date Invest. Completed</th>
<th>Disposition</th>
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I certify to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or no complaints or lawsuits alleging discrimination, have been filed with or against Huntsville Transit, since the previous Title VI Program submission to PTA.

Signature of Title VI Coordinator or Other Authorized Official

Date

Print Name and Title of Authorized Official

At this time, there have been no complaints or lawsuits filed related to any service performed by the Huntsville Transit system of the City of Huntsville, Department of Parking & Huntsville Transit since the last program update.

10 TITLE VI TRAINING

As with the implementation of our programs in general, organization-wide compliance is required. Huntsville Transit is committed to ensuring all staff comply with Title VI requirements through training and notices. New hires, employees and staff will periodically be reminded of our Title VI nondiscrimination obligations. The statements below will be part of the new hire process and periodic training (Appendix E):

Education Form

Title VI Nondiscrimination Policy

No person shall, on the ground of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of a Federal-aid recipient.

All employees and representatives of Huntsville Transit are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct him or her to J. Thomas Brown, Jr., Director, at (256) 427-6800, 500 B Church Street, Huntsville, AL 35801.

In all dealings with the public, you may use courtesy titles (e.g., Mr., Mrs., Miss, Dr.) to address or refer to them without regard to their race, color, national origin, sex, age, or disability.
11 LIMITED ENGLISH PROFICIENCY (LEP)

11.1 INTRODUCTION
This Limited English Proficiency Plan has been prepared to address the City of Huntsville, Huntsville Transits responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all City of Huntsville departments and divisions receiving federal grant funds. Huntsville Transit receives federal assistance through the U.S. Department of Transportation [U.S. DOT].

11.2 PLAN SUMMARY
Huntsville Transit has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, Huntsville Transit coordinated with the Planning Department to establish the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Huntsville Transit program, activity, or service.
2. The frequency with which LEP persons come in contact with Huntsville Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Huntsville Transit to the LEP population.
4. The resources available to Huntsville Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

11.3 MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS
1. The number or proportion of LEP Persons in the service area who may be served or are likely to encounter a Huntsville Transit program, activity, or service.

The City of Huntsville, Planning Department staff have recorded the estimate (Percent) of population (5 Years and Over) that speaks English less than “Very Well”:

<table>
<thead>
<tr>
<th>Language</th>
<th>Huntsville (#)</th>
<th>Huntsville (%)</th>
<th>Madison Co (#)</th>
<th>Madison Co (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>4,285</td>
<td>2.3%</td>
<td>5,248</td>
<td>1.5%</td>
</tr>
<tr>
<td>Other Indo-European</td>
<td>761</td>
<td>0.04%</td>
<td>1,081</td>
<td>0.3%</td>
</tr>
<tr>
<td>Asian</td>
<td>1,180</td>
<td>0.6%</td>
<td>1,870</td>
<td>0.5%</td>
</tr>
<tr>
<td>Other</td>
<td>67</td>
<td>0%</td>
<td>81</td>
<td>0.4%</td>
</tr>
<tr>
<td>Speaks English Only</td>
<td>91.7%</td>
<td></td>
<td>93.1%</td>
<td></td>
</tr>
</tbody>
</table>
Tables: Selected Social Characteristics in the United States (DP02)
Tracts: Language spoken at home by ability to speak English for the population 5 years and over (B16001)

2. The frequency with which LEP persons come in contact with Huntsville Transit programs, activities, or services.

Huntsville Transit reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, Huntsville Transit has had no requests for interpreters and no requests for translated program documents. Staff and vehicle operators have had very little to no contact with LEP persons.

The following chart from surveys performed in early 2021 identifies the specific contacts made during service operations for transit programs:

<table>
<thead>
<tr>
<th>Program</th>
<th>Language</th>
<th>Total</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fixed Route - ORBIT</td>
<td>Spanish</td>
<td>21</td>
<td>1.0%</td>
</tr>
<tr>
<td></td>
<td>Deaf</td>
<td>1</td>
<td>0.0%</td>
</tr>
<tr>
<td></td>
<td>Asian?</td>
<td>1</td>
<td>0.0%</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>7</td>
<td>0.3%</td>
</tr>
<tr>
<td>Fixed Route - ORBIT Total</td>
<td></td>
<td>30</td>
<td>1.4%</td>
</tr>
<tr>
<td>Paratransit - ACCESS</td>
<td>Spanish</td>
<td>5</td>
<td>0.2%</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>3</td>
<td>0.1%</td>
</tr>
<tr>
<td>Paratransit - ACCESS Total</td>
<td></td>
<td>8</td>
<td>0.4%</td>
</tr>
<tr>
<td>Grand Total</td>
<td></td>
<td>38</td>
<td>1.8%</td>
</tr>
</tbody>
</table>

Average Daily Ridership: 2,126
Total Number of Contacts: 38
Percentage of Total Ridership: 1.8%

Total Spanish Speaking Contacts: 26
Percentage of Total Ridership: 1.2%

3. The nature and importance of programs, activities, or services provided by Huntsville Transit to the LEP population.

There are three (3) Census tracts where more than ten (10) percent of the population spoke English less than "very well":

1) Tract 22 (Westlawn)
2) Tract 23 (Merrimack)
3) Tract 25.01 (Brahmian Spring)

Source: US Census Bureau, 2015-2019 American Community Survey (ACS) 5-Year Estimates, Table DP02 ("Selected Social Characteristics in the United States")

The overwhelming majority of the population, 92% in Huntsville and 93.9% in Madison County, speak only English. As a result, there are few social, service, professional and leadership organizations within the Huntsville
Transit service area that focus on outreach to LEP individuals. Services provided by Huntsville Transit that are most likely to encounter LEP individuals are the fixed route [ORB] system which serves the general public and the demand response / paratransit [ACCESS] system which serves primarily senior and disabled persons.

4. The resources available to Huntsville Transit and overall cost to provide LEP assistance.

Huntsville Transit reviews its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise and taking an inventory of available organizations that could be partnered with for outreach and translation efforts. The most readily available, and most often used by our operators and supervisors, is to use the CALL 2.1.1. services. The Alabama Hispanic Association based in Huntsville can be tapped for assistance when necessary; this organization is composed of dedicated volunteers assisting in the needs of the Hispanic Community in North Alabama, not just within the City of Huntsville. There is also a Japan-American Society of Alabama (JASA) based in Birmingham, AL. In addition, the two (2) local universities have foreign or international student programs. These programs are designed to accommodate the needs of the students whose first language is not English. Alabama A & M University’s program assigns an interpreter who accompanies the foreign students when learning the fixed route system (ORB) and the layout of the City in general. The City of Huntsville, Police Departments’ Communications Division is also available as a resource for Russian, Ukrainian, Polish, Spanish, and French. The City of Huntsville, Office of Multicultural Affairs. Another resource that has become available is the Google Translate smart phone application. Our driver coordinators/supervisors now have that available on the smart phones and are available to help communicate with all our clients.

11.4 Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Huntsville Transit programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer or a message from one language into another language. Huntsville Transit will determine when interpretation and/or translation are needed and are reasonable. How the Huntsville Transit staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
2. When Huntsville Transit sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at Huntsville Transit events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
4. Have Language Identification Flashcards available at the customer service desk and easily accessible to lead drivers, supervisors, dispatchers, and schedulers as needed.
5. Post notice of LEP Plan and the availability of Language Identification Flashcards.
6. Vehicle operators and other front-line staff, like lead drivers, supervisors, dispatchers and schedulers will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
7. Utilize the Google Translate application to communicate effectively with all transit clients.
8. Utilize the Call 2.1.1. services.
11.5 LANGUAGE ASSISTANCE MEASURES
Although there is a very low percentage in Huntsville and Madison county of LEP individuals, that is, persons who speak English "not well" or "not at all", Huntsville Transit will strive to offer the following measures:

1. Huntsville Transit’s Title VI Policy and Huntsville Transit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. There are several resources available to Huntsville Transit to accommodate LEP persons.
   1) Call 211.
   2) Alabama Hispanic Association
      The Volunteer Center of Madison County
      256-457-9754
   3) Japan-American Society of Alabama (JASA)
      205-703-0960
      B’ham, AL
   4) AAMU
      Spanish Club, Advisor
      256-372-5399
   5) UAH Language and Culture Programs
      256-824-6192
   6) Google Translate app
   7) Multicultural Affairs Office
      City of Huntsville, AL
      Kenny Anderson
      256-883-3993
   8) Huntsville Police Department
      Community Resource Office
      256-746-4132, or;
   9) Non-Emergency No. 256-722-7100
3. If a client asks for language assistance and Huntsville Transit determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, Huntsville Transit will provide the language assistance in the LEP client’s preferred language. Huntsville Transit has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
4. Huntsville Transit will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
5. When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance at one or more of the available resources identified above, section 4.1) thru 9)

11.6 STAFF TRAINING
Information will be distributed to all Huntsville Transit staff and Posted on the Huntsville Transit website, http://www.huntsvilleal.gov/residents/streets/public-transportation/public-transportation-civil-rights/. The Title VI coordinator, managers, and supervisors will follow the Title VI LEP Program Plan Bullets (Appendix F).

1. Information on the Title VI Policy and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Documentation of language assistance requests.
4. How to handle a potential Title VI/LEP complaint.
11.7 TRANSLATION OF DOCUMENTS
1. Huntsville Transit weighed the cost and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of busing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in a LEP group and other relevant factors. At this time it is an unnecessary burden to have any documents translated.
2. Due to the very small local LEP population, Huntsville Transit does not have a formal outreach procedure in place, as of 2021. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, Huntsville Transit will consider the following options:
   1) When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
   2) Bus schedules, maps, and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP population is identified and requests made.

11.8 FORMAL INTERPRETERS
1. When necessary to provide meaningful access for LEP clients, Huntsville Transit will provide qualified interpreters, including any bilingual staff of the City of Huntsville, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
2. Huntsville Transit may require a formal interpreter to certify to the following:
   1) The interpreter understood the matter communicated and rendered a competent interpretation.
   2) The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
   3) Bilingual City employees, when available, can provide limited assistance to Huntsville Transit staff and LEP clients as part of their regular job duties.

11.9 INFORMAL INTERPRETERS
1. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. City staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
2. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the City. If possible, Huntsville Transit/City should accommodate an LEP client’s request to use an informal interpreter in place of a formal interpreter.
3. If an LEP client prefers an informal interpreter, after Huntsville Transit has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.

11.10 OUTSIDE RESOURCES
1. Outside resources may include community volunteers
2. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.
11.11 MONITORING

**Monitoring and Updating the LEP Plan**—Huntsville Transit will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Huntsville Transit service area. Updates will include the following:

1. The number of documented LEP person contacts encountered annually.
2. How the needs of LEP persons have been addressed.
3. Determination of the current LEP population in the service area.
4. Determination as to whether the need for translation services has changed.
5. Determine whether local language assistance programs have been effective and sufficient to meet the need.
6. Determine whether transit system’s financial resources are sufficient to fund language assistance resources needed.
7. Determine whether Huntsville Transit fully complies with the goals of this LEP Plan.
8. Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

11.12 DISSEMINATION OF THE HUNTSVILLE TRANSIT LEP PLAN

1. A link to the Huntsville Transit Title VI Plan, that includes Huntsville Transit’s LEP Plan, will be included on the City of Huntsville, Public Transit website: [https://www.huntsvilleal.gov/residents/streets/public-transportation/public-transportation-civil-rights/](https://www.huntsvilleal.gov/residents/streets/public-transportation/public-transportation-civil-rights/)

2. Any person or agency with internet access will be able to access and download the plan from the Huntsville Transit website. Alternately, any person or agency may request a copy of the plan via telephone, fax, mail, email, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Huntsville Transit will provide, if feasible.

3. Questions or comments regarding the LEP Plan may be submitted to the City of Huntsville, Department of Parking & Public Transit, Huntsville Transit, 500 B Church Street, Huntsville, AL 35801, or by phone at (256) 427-6811.

12 MPO PUBLIC PARTICIPATION PLAN

Recipients of Federal financial funds are required to perform outreach to engage minority and limited English-speaking populations and to maintain required documentation of such.

The Huntsville Area Metropolitan Planning Organization plans and administers public outreach.


Title VI language has been incorporated into the Final Year 2040 Transportation Plan and can be found at [http://www.huntsvillempo.org/20245/](http://www.huntsvillempo.org/20245/).


- Several methods used to inform minority communities of planning efforts are identified in the following:
  1) 3.2.3 Press Releases, page 34.
  2) 3.3.1 Policy 1, Objective 1.1, page 38.
3.3.4 Policy 4 Objective 4.1, Objective 4.2, and Objective 4.3, page 41.
- The Plan identifies how the needs of LEP persons and minorities are considered in Appendix C. Title VI Documentation – Limited English Proficiency Plan
  1) Chapter 2 Meaningful Access page C-3.

Public outreach, involvement, and participation activities performed are listed and summarized in the Long Range Transportation Plan (LRTP). Lists of meetings, surveys, results can be found in Chapter 10 beginning on page 121 at this site: http://www.huntsvillempo.org/wp-content/uploads/2020/06/052220-Updated-TRIP2045-Web.pdf

- In December 2020, ALDOT held a Title VI/ webinar, due to COVID-19 restrictions, training for the MPO and other agencies.

### 12.1 Representation on Boards

#### CAC Membership- Huntsville Area MPO

<table>
<thead>
<tr>
<th>Race</th>
<th>Gender</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>African-American</td>
<td>Male</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>1</td>
</tr>
<tr>
<td>Caucasian</td>
<td>Male</td>
<td>8</td>
</tr>
<tr>
<td>Hispanic</td>
<td>Male</td>
<td>1</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>12</td>
</tr>
</tbody>
</table>

#### TCC Membership- Huntsville Area MPO

<table>
<thead>
<tr>
<th>Race</th>
<th>Gender</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>African-American</td>
<td>Male</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>3</td>
</tr>
<tr>
<td>Asian</td>
<td>Female</td>
<td>1</td>
</tr>
<tr>
<td>Caucasian</td>
<td>Male</td>
<td>14</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>3</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>22</td>
</tr>
</tbody>
</table>

#### MPO Policy Board Membership- Huntsville Area MPO

<table>
<thead>
<tr>
<th>Race</th>
<th>Gender</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>African-American</td>
<td>Female</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td>7</td>
</tr>
<tr>
<td>Caucasian</td>
<td>Female</td>
<td>1</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>11</td>
</tr>
</tbody>
</table>

The Boards of the MPO consist of the MPO board, TCC board, and the CAC board. Chapter 1.2 of the PPP discusses the history and makeup of the Metropolitan Planning Board.

- MPO board is comprised of MPO urbanized area elected or executive persons.
- The TCC, Technical Coordinating Committee is comprised of technical personnel of the operating agencies on the MPO.
- The CAC, the Citizens’ Advisory Committee is the public involvement through citizen representation. This committee is composed of 16 members appointed by the officials of local governments who serve on the MPO. Public announcements, general circulation newspapers, including the local minority newspaper, Speakin’ Out News, radio and television stations are used to invite the general public to participate, not only in the decision making planning process, but to consider serving on the CAC.
12.2 Sub-Recipients
MPO LEP Plan Introduction 1.0

- The City of Huntsville, Department of Parking and Public Transit, Huntsville Transit is a direct recipient of FTA funds and as a participant of the MPO, has in place a Title VI Limited English Proficiency Plan that has been approved by the Federal Transit Administration. Huntsville Transit has NO sub-recipients.
- Madison County’s transportation service, TRAM, is a sub-recipient of FTA funds through the Alabama Department of Transportation and is a participant of the HATS-MPO. Madison County’s program has in place a Title VI Limited English Proficiency Plan and works with the Alabama Department of Transportation as the direct recipient to ensure that all requirements are met. This specific document expands upon the City of Huntsville’s and Madison County’s plan and covers the entire MPO Study Area. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

13 Title VI Equity Analysis on Site or Location of Facilities

Recipients of Federal financial funds are required to conduct a Title VI Equity Analysis when determining site or location of facilities during the planning stages to ensure the location is selected without regard to race, color, or national origin.

The City of Huntsville, Alabama, Department of Parking & Public Transit, Huntsville Transit will perform the required analysis during all anticipated projects, if applicable, when they are in the planning stages.

13.1 Transfer Station
The City of Huntsville, Huntsville Transit, has been considering and investigating the possibility of a new transfer station for many years. Huntsville Transit needed increased space to continue uninterrupted service and have the ability to expand. In March 2020, the City applied for Section 49 USC §5339(b) Buses and Bus Facilities competitive grant thru Grants.gov and was awarded funding for the first phase of a multimodal project.

The new station had multiple criteria, one being close proximity to our current operations and administration facility and be city owned property.

The property proposed and decided upon is within a half a mile of the current facility. The property formerly housed a concrete company. The structures were razed, tanks removed, and any standing facilities demolished by the company around 2015. The entire site was disturbed and is currently being used as a staging area for a construction company that has been contracted to re-route Church Street.

A Phase I Environmental Site Assessment (ESA) that was contracted by the City to be completed. The Phase I Environmental Site Assessment was completed on April 13, 2015. The property is located in a General Business C3 Zoning district and bounded by the same C3 zoning district on the north, south, east and west and a legal description of this property can be found on the Executive Summary of the assessment.

Several property alternatives were compared. The project had public outreach. It was advertised, presented and discussed at the CAC, TCC, and MPO meetings, as well as, City of Huntsville, City Council Regular Sessions.

The assessment found no disparate impact on the basis of race, color, or national origin. FTA Region IV, Environmental Specialist has determined the project as a Categorical Exclusion.

The FTA NEPA Assignment of Appropriate Level of Environmental Analysis is attached.
14 Fixed Route Transit Service Standards & System-Wide Policies

14.1 Service Standards

- Vehicle Load Standard

Huntsville Transit has identified a standard of an average load factor 1.2% for all modes of services offer, Fixed Route and Paratransit.

Huntsville Transit has not identified any ‘peak’ hours, and Huntsville Transit continues to utilize seating capacity as achievable capacity.

Huntsville Transit fleet consists of twelve (12) low floor buses with a seating capacity of 29; or 25 with 2 wheelchairs secured in the bus. The fixed route fleet also includes seven (7) older high floor buses with a seating capacity of 26; or 22 with 2 wheelchairs secured in the bus.

In March 2020 Huntsville Transit began the policy and practice of limiting the number of passengers that occupy the fixed route bus seating at one time. For the low floor buses, we bagged off some of the seats to create distance in response to the Covid-19 pandemic. On the low floor buses, this meant that approximately 10 seated with 2 standing would be the new capacity limit. For the older high floor buses, the new capacity became 9 seated with 2 standing.

Ridership decreased by approximately 40% during the pandemic, due in part to the new capacity constraints.

- Assessment: Vehicle Load service monitoring from FY 2020 data confirms that both modes are well below the standard load factor standard. For informational purposes, FY 2020 ridership decreased dramatically due to the Covid-19 pandemic.
### Vehicle Load Factor - Post COVID-19 Constraints

<table>
<thead>
<tr>
<th>MODE</th>
<th>ASSET CLASS</th>
<th>MODEL</th>
<th>Values</th>
<th>FY 2020 UPT</th>
<th>ANNUAL LOAD FACTOR</th>
</tr>
</thead>
<tbody>
<tr>
<td>DR</td>
<td>CU - Cutaway Bus</td>
<td>Starcraft Starlite</td>
<td>Count of Post Covid-Seating</td>
<td>4</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sum of Post Covid-Seating</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Starcraft Starlite Total</td>
<td></td>
<td>15</td>
<td>60</td>
</tr>
<tr>
<td></td>
<td></td>
<td>E3SE Pacer II</td>
<td></td>
<td>4</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td></td>
<td>E3SE Pacer II Total</td>
<td></td>
<td>12</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td>CU - Cutaway Bus Total</td>
<td></td>
<td></td>
<td>27</td>
<td>108</td>
</tr>
<tr>
<td>DR Total</td>
<td></td>
<td></td>
<td></td>
<td>27</td>
<td>108</td>
</tr>
<tr>
<td>MB</td>
<td>BU - Bus</td>
<td>EZ Rider II, Low Floor</td>
<td></td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td></td>
<td>EZ Rider II, Low Floor Total</td>
<td></td>
<td>12</td>
<td>120</td>
</tr>
<tr>
<td></td>
<td></td>
<td>TRANSMARK RE, High Floor</td>
<td></td>
<td>9</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>TRANSMARK RE, High Floor Total</td>
<td></td>
<td>7</td>
<td>63</td>
</tr>
<tr>
<td></td>
<td>BU - Bus Total</td>
<td></td>
<td></td>
<td>19</td>
<td>183</td>
</tr>
<tr>
<td>MB Total</td>
<td></td>
<td></td>
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<td>19</td>
<td>183</td>
</tr>
<tr>
<td>Grand Total</td>
<td></td>
<td></td>
<td></td>
<td>46</td>
<td>291</td>
</tr>
</tbody>
</table>

### Vehicle Headway Standards

Huntsville Transit operates thirteen (13) buses on ten (10) routes Monday through Thursday, fourteen (14) buses on eleven (11) routes on Fridays. On Saturday’s, Huntsville Transit runs ten (10) buses on ten (10) routes. Three bus routes operate on 30-minute headways (Routes 1, 2, and 4). Two routes (Routes 5 and 6) operate on a common corridor with 30-minute headways between downtown and Airport Road in South Huntsville. Five (5) fixed routes operate on a 1-hour headway. The Friday night Route 11 Shopping Shuttle Route operates every 45 minutes.

The routes with the 30 minute headways are the highest volume ridership.

There continues to be no data to substantiate differentiation between peak and non-peak hours.

- **Assessment:** Huntsville Transit continues to provide routes with less headways to the three (3) routes that have the highest ridership.

### ROUTES Weekdays

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Headway</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Brahan Spring, downtown</td>
<td>30 mins</td>
</tr>
<tr>
<td>2</td>
<td>Patton Road, SW Hsv</td>
<td>30 mins</td>
</tr>
<tr>
<td>3</td>
<td>Holmes Ave, UAH</td>
<td>60 mins</td>
</tr>
<tr>
<td>4</td>
<td>University Dr</td>
<td>30 mins</td>
</tr>
<tr>
<td>5</td>
<td>Byrd Spring, South Hsv</td>
<td>30/60 mins</td>
</tr>
<tr>
<td>6</td>
<td>Jones Valley, South Hsv</td>
<td>30/60 mins</td>
</tr>
<tr>
<td>7</td>
<td>Meridian Str, AAMU</td>
<td>60 mins</td>
</tr>
<tr>
<td>8</td>
<td>Blue Springs, North Hsv</td>
<td>60 mins</td>
</tr>
<tr>
<td>9</td>
<td>Oakwood Ave, North Hsv</td>
<td>60 mins</td>
</tr>
<tr>
<td>10</td>
<td>Pulaski Pike</td>
<td>60 mins</td>
</tr>
<tr>
<td>11</td>
<td>UAH Campus, Friday evenings</td>
<td>45 mins</td>
</tr>
</tbody>
</table>
• On-Time Performance Standard

Huntsville Transits’ on-time performance standard is 90% or greater. Departure on-time standard is departing a timepoint no more than 10 minutes late, never leaving early. Arrival on-time standard is arriving at a timepoint no more than 10 minutes late.

- Assessment: Huntsville Transit continues to monitor and strive for the 90% on-time performance, which can be fluid depending on construction, weather, and time of year.

• Service Availability Standard

Huntsville Transit has set a service availability standard that the majority of routes will be located within residential areas most densely populated with low-income or minority population, as well as elderly population, as determined from Census data. Huntsville Transit service will be distributed so that 90% of all residents in the service area are within 1/4 mile walk of bus service.

- Assessment: Fixed routes are designed to comply with the standard set.

14.2 System-Wide Service Policies

• Transit Amenities Policy

Huntsville Transit has set a service policy for distribution of amenities as the average number of benches and/or shelters be located along minority/poverty routes shall exceed the average number of benches and/or shelters along non-minority/non-poverty routes.

- Assessment: All shelters installed, or replaced, since the last Title VI update have been placed on routes located, per the census data, designated as low-income or minority populations, or on a route that sits at the entrance of an apartment complex that is populated by elderly/retired persons, the main patrons along that route.

• Vehicle Assignment Policy

Huntsville Transit has set a vehicle assignment policy to assign the newest buses to the fixed routes with the highest ridership and the highest number of wheelchair boardings.

- Assessment: Huntsville Transit continues to follow this policy with arrival of each new vehicle.
APPENDICES

APPENDIX A

Public notification check sheet

The notices have been verified posted at the following locations:

☐ Front office, ticket sales area.
☐ Transfer point waiting room.
☐ City of Huntsville, Huntsville Transit website

APPENDIX B

NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

City of Huntsville, Alabama, Huntsville Transit

- The City of Huntsville, Alabama, Huntsville Transit operates its programs and services 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 Huntsville, Alabama, Department of Parking & Public Transit.
- To file a Title VI complaint with Huntsville Transit, you can:
  1) Ask for a nondiscrimination complaint form directly from Huntsville Transit administrative office at 500 B Church Street, Huntsville, AL, 35801
  2) Call 256-427-6811 office phone, TDD for the hearing impaired 800-548-2547 (voice), or 800-548-2546 (TTY)
  3) Email the director at tommy.brown@huntsvilleal.gov
  4) Go online to the City of Huntsville, Huntsville Transit Civil Rights site at https://www.huntsvilleal.gov/residents/streets/public-transportation/public-transportation-civil-rights/
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact 256-427-6811.

Si se necesita información en otro idioma, por favor póngase en contacto con 256-427-6811.
APPENDIX C

City of Huntsville,
Department of Parking & Public Transit
Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states "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." Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to: J. Thomas Brown, Jr., Director, City of Huntsville, Department of Parking & Public Transit, 500 B Church Street, Huntsville, AL 35801.

1. Complainant's Name: __________________________________________

2. Address: _____________________________________________________


4. Telephone No. (Home): __________________ (Business): __________

5. Person discriminated against (if other than complainant)

Name: __________________________________________________________

Address: __________________________________________________________

City: __________________ State: ____________ Zip Code: __________

6. What was the discrimination based on? (Check all that apply):

_______ Race/Color _________ Sex

_______ National Origin _________ Disability

_______ Low Income _________ Elderly

_______ Limited English Proficiency

7. Date of incident resulting in discrimination: ______________________

8. Describe how you were discriminated against. What happened and who was responsible? For additional space, attach additional sheets of paper or use back of form.

_________________________________________________________________

_________________________________________________________________

_________________________________________________________________
9. Did you file this complaint with another federal, state, or local agency; or with a federal or state court? (Check appropriate space) Yes ______ No ______

If answer is yes, check each agency complaint was filed with:

Federal Agency ______  Federal Court ______  State Agency ______

State Court ______ Local Agency ______  Other ______

10. Provide contact person information for the agency you also filed the complaint with:

Name: ________________________________________________

Address: ________________________________________________

City: ____________________ State: __________ Zip Code: __________

Date Filed: ________________________________________________

11. Sign the complaint in space below. Attach any documents you believe supports your complaint.

__________________________  ___________________________
Complainant's Signature    Signature Date
APPENDIX D

DISCRIMINATION COMPLAINTS LOG

LOG YEAR(S):

<table>
<thead>
<tr>
<th>Plaintiff Name</th>
<th>Race / Gender</th>
<th>Respondent Name</th>
<th>Basis</th>
<th>Date Filed</th>
<th>Date Received</th>
<th>Action Taken</th>
<th>Date Invest. Completed</th>
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No Complaints or Lawsuits

I certify to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or no complaints or lawsuits alleging discrimination, have been filed with or against Huntsville Transit, since the previous Title VI Program submission to FTA.

______________________________
Signature of Title VI Coordinator or Other Authorized Official

______________________________
Date

______________________________
Print Name and Title of Authorized Official
Education Form

Title VI Nondiscrimination Policy

No person shall, on the ground of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of a Federal-aid recipient.

All employees and representatives of Huntsville Transit are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct him or her to J. Thomas Brown, Jr., Director, at (256) 427-6800, 500 B Church Street, Huntsville, AL 35801.

In all dealings with the public, you may use courtesy titles (e.g., Mr., Mrs., Miss, Dr.) to address or refer to them without regard to their race, color, national origin, sex, age, or disability.
APPENDIX F

TITLE VI LEP PROGRAM
PLAN BULLETS
For Distribution to Managers, Supervisors, Drivers, Dispatchers and Technicians

- Maintain records of all client/passenger/related people’s inquiries, requests, questions or general information gathering directly or indirectly related with or about a person who has limited English skills, oral or written.
- Each manager maintains that file until requested annually, or as necessary, by Program Fiscal Officer for Title VI updates or submission to FTA.
- Language flash card (one page from a website) available at 2nd floor front desk. Managers and supervisors should keep their own copy available. Flash card will help identify what language client is fluent in.
- For language assistance follow the procedures set out in the updated Title VI Program Plan, LEP Plan.
- A copy of the complaint procedures for all Title VI complaints will be distributed at the next scheduled staff meeting.
- Attached is copy of an informal survey for distribution. Please have all personnel fill it out now and keep managers LEP file until requested.
- At some point in the near future the director, operations manager and program fiscal officer will review the questionnaires to determine if there is a need to address LEP concerns more stringently.
I’m sure you all remember that LEP is the Limited English Proficiency Program requirement under the Federal Title VI Act. As an FTA Grantee we are required to do the following, which includes monitoring our percentage (decrease/increase) of minority passengers/clients. I passed this info out several times over the years, generally at staff meetings; it is time to address these again.

- Maintain records of all client/passenger/related people’s inquiries, requests, questions or general information gathering directly or indirectly related with or about a person who has limited English skills, oral or written.
  - This includes drivers, coordinators, front desk personnel, dispatchers, etc.
- Each manager/operations personnel maintain that file.
  - Or, submit them to me if it’s easier
- Language flash card (one page from a website) available at 2nd floor front desk. Managers and supervisors should keep their own copy available. Flash card will help identify what language client is fluent in.
  - Please confirm it is still available at front desk?
- For language assistance follow the procedures set out in LEP Plan.
- A copy of the complaint procedures for all Title VI complaints has been distributed to the staff.
  - Please make sure you have that available.
- Attached is copy of an informal survey for distribution. Please have all personnel fill it out now and submit them to me when you have collected them. They should respond to everything they remember for the last several years.

My general observations are that there has been an increase in Hispanic clients over the months/years.
TITLE VI PROGRAM
LEP PLAN SURVEY

Employee Position: ______________________  Employee Name: ______________________

1. Have you come in contact with someone who does not speak English well, or at all?

2. What type of contact was it? Did they ask for an interpreter? A bus schedule? Help with paratransit or demand response (ACCESS)? Please be as specific as possible.

3. How long ago was that?

4. How often does this happen?

5. Was it on the phone, on a vehicle, at front office, at the transfer point or a scheduled stop?

6. Do you have any idea what language the person spoke, or what nationality they were? Please list if so.

7. Is there anything, in your opinion, that Public Transit can do to help the limited English speaking population when dealing with our Fixed Route (Orbit) and paratransit (ACCESS) programs?
Resources for Communicating with Limited English Proficiency Clients

- Call 2.1.1.
- Alabama Hispanic Association
  The Volunteer Center of Madison County
  256-457-9754
- Japan-American Society of Alabama (JASA)
  205-703-0960
  B'ham, AL
- AAMU
  Spanish Club, Advisor
  256-372-5399
- UAH Language and Culture Programs
  256-824-6192
- Google Translate app
- Multicultural Affairs Office
  City of Huntsville, AL
  Kenny Anderson
  256-883-3993
- Huntsville Police Department
  Community Resource Office
  256-746-4132, or;
  Non-Emergency No. 256-722-7100