

# WHITFIELD COUNTY TRANSPORTATION SYSTEM

## *Title VI Program*



In accordance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination laws, public participation is solicited without regard to religion, age, race, color, national origin, sex, disability, familial, or income status.

Prepared by: Whitfield County Staff

Adopted: January 16, 2015

Updated: April 12, 2021

In Cooperation with the Georgia Department of Transportation

In Cooperation with the Federal Transit Administration

## **Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan**

Whitfield County Transit System assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Whitfield County Transit System further agrees to the following responsibilities with respect to its programs and activities:

- Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
- Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
- Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
- Develop a complaint process and attempt to resolve complaints of discrimination against Whitfield County Transit System.
- Participate in training offered on the Title VI and other nondiscrimination requirements.
- If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
- Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
- Submit the information required by FTA Circular 4702.1B to the GDOT (refer to Appendix A of this plan).

**THIS ASSURANCE** is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

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

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

Chairman of the Board, Whitfield County

Date: \_\_\_\_\_

4-14-21

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## **INTRODUCTION & DESCRIPTION OF SERVICES**

Whitfield County Transit System submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Whitfield County Transit System is a sub-recipient of FTA funds and provides service in Whitfield County, Georgia. A description of the current Whitfield County Transit System is included in Appendix B.

### **Title VI Liaison**

Jacob Bearden – Title VI Liaison  
Whitfield County Board of Commissioners  
(706) 876-2592  
201 South Hamilton Street  
Dalton, GA 30720

### **Alternate Title VI Contact**

Jackie Carlo, Alternate Title VI Contact  
Whitfield County Board of Commissioners  
706-275-7512  
201 South Hamilton Street  
Dalton, GA 30720

Whitfield County Transit System must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

## **First Time Applicant Requirements**

Whitfield County Transit System is not a first-time applicant for FTA/GDOT funding. The following is a summary of Whitfield County Transit System's current and pending federal and state funding.

### **Current and Pending FTA Funding**

- 1) 5311 Rural Transportation Administrative/Operational Grant-, October 2020 to September 2021, Current \$ 98,267.87 Pending \$225,185.13
- 2) 5311 Rural Transportation Capital Grant-, October 2020 to September 2021, \$97,158.34 Pending

### **Current and Pending GDOT Funding**

- 1) 5311 Rural Transportation Administrative/Operational Grant-, October 2020 to September 2021, \$ 0.00 Pending
- 2) 5311 Rural Transportation Capital Grant-July 2018 to June 2018, \$9,794.58 Pending

### **Current and Pending Federal Funding (non-FTA)**

- 1) 5311 Rural Transportation Administrative/Operational Grant-, October 2020 to September 2021, \$0.00 Pending
- 2) 5311 Rural Transportation Capital Grant- October 2020 to September 2021, \$ 0.00 Pending

### **Current and Pending State Funding (non-GDOT)**

- 1) Department of Human Services/ - MHDD October 2020 to September 2021, Current \$43,823.00
- 2) Department of Human Services/ - MHDD October 2020 to September 2021, \$89,833.90 Pending

During the previous three years, Georgia Department of Transportation did not complete a Title VI compliance review of Whitfield County Transit System. Whitfield County Transit System has not been found to be in noncompliance with any civil rights requirements.

### **Annual Certifications and Assurances**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Whitfield County Transit System will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT and other primary recipients.

### **Title VI Plan Concurrence and Adoption**

This Title VI Plan received GDOT concurrence on **January 16, 2015**. The Plan was approved and adopted by Whitfield County Board of Commissioners during a meeting held on **January 16, 2015**. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

The Title VI Plan was updated and approved by the Whitfield County Board of Commissioners during a meeting held on **April 12, 2021**.

## **TITLE VI NOTICE TO THE PUBLIC**

### **Notice to the Public**

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin.
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations.
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee.

A sample of the notice is included in Appendix D of this Plan.

### **Notice Posting Locations**

The Notice to Public will be posted at many locations to apprise the public of Whitfield County Transit System's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Whitfield County Transit System's office(s) including the reception desk and meeting rooms, and on the Whitfield County Transit System's website at <http://www.whitfieldcountyga.com/transit.htm>. Additionally, Whitfield County Transit System will post the notice on the transit vehicles.



## **TITLE VI PROCEDURES AND COMPLIANCE**

### **Complaint Procedure**

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Whitfield County Transit System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Whitfield County Transit System investigates complaints received no more than 180 days after the alleged incident. Whitfield County Transit System will process complaints that are complete.

Once the complaint is received, Whitfield County Transit System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Whitfield County Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Whitfield County Transit System may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Whitfield County Transit System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on the Whitfield County Transit System's website: <http://www.whitfieldcountyga.com/transit.htm>.

## **Complaint Form**

A copy of the complaint form in English and Spanish is provided in Appendix E and on the Whitfield County Transit System's website: <http://www.whitfieldcountyga.com/transit.htm>.

## **Record Retention and Reporting Policy**

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Whitfield County Transit System will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

## **Sub-Recipient Assistance and Monitoring**

Whitfield County Transit System does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Whitfield County Transit System utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Whitfield County Transit System has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

## **Sub-Recipients and Subcontractors**

Whitfield County Transit System is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Whitfield County Transit System, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

## **Nondiscrimination Clauses**

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

- 1) **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
- 2) **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- 3) **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to

be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

- 4) **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
- 5) **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Whitfield County Transit System shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination or suspension of the contract, in whole or in part.
- 6) **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Whitfield County Transit System, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

### **Disadvantaged Business Enterprise (DBE) Policy**

As a condition of your agreement with GDOT, Whitfield County Transit System and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Whitfield County Transit System and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

### **E-Verify**

As a condition of your agreement with GDOT, vendors and contractors of Whitfield County Transit System shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Whitfield County Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Whitfield County Transit System shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Whitfield County Transit System.

## Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Whitfield County Transit System must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Whitfield County Transit System in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT and/or other primary recipient.

Whitfield County Transit System has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	0	0	0	0
1.				
2.				
Lawsuits	0	0	0	0
1.				
2.				
Complaints	0	0	0	0
1.				
2.				

## **Public Participation Plan**

The Public Participation Plan (PPP) for Whitfield County Transit System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Whitfield County Transit System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Whitfield County Transit System services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

### **Current Outreach Efforts**

Whitfield County Transit System is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Whitfield County Transit System's recent, current, and planned outreached activities.

- Whitfield County Government submits to the Georgia Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period. Additionally, system-wide policy decisions are made by the Whitfield County Board of Commissioners during regularly scheduled board meetings which are open to the public.
- Public board meeting dates and times are advertised on the Whitfield County website, [www.whitfieldcountygga.com](http://www.whitfieldcountygga.com), in the local newspaper, and the local radio. These public meetings provide an opportunity for citizens to offer comment and input with respect all county business up for deliberation, as well as to the Whitfield County Transit System' grant applications and programs or projects. All interested citizen are invited to attend these meetings.
- Website: Whitfield County Transportation System maintains a comprehensive website, at <http://www.whitfieldcountygga.com/transit.htm>, which is updated as needed. This site includes services, schedule information, and contact information.

## **Language Assistance Plan**

Whitfield County Transit System operates a transit system within Whitfield County. The Language Assistance Plan (LAP) has been prepared to address Whitfield County Transit System's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Whitfield County Transit System service area there are 15,042 residents or 15.5% who describe themselves as not able to communicate in English very well (Source: US Census). Whitfield County Transit System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Whitfield County Transit System has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

## Transit Planning and Advisory Bodies

The Whitfield County Transit System-related, non-elected advisory committee consists of 5 members appointed by Whitfield County Human Resources.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population	60.1%	33.5%	3.7%	1.4%	0.7%	0.6%
Advisory Committee	40%	40%	20%	0%	0%	0%

## **Title VI Equity Analysis**

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Whitfield County Transit System will ensure the following:

- 1) Whitfield County Transit System will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Whitfield County Transit System will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) When evaluating locations of facilities, Whitfield County Transit System will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
- 3) If Whitfield County Transit System determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Whitfield County Transit System may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Whitfield County Transit System must demonstrate and document how both tests are met. Whitfield County Transit System will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Whitfield County Transit System has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Whitfield County Transit System does not have any Title VI Equity Analysis reports to submit with this Plan. Whitfield County Transit System will utilize the demographic maps included in Appendix I for future Title VI analysis.]



## **System-Wide Service Standards and Service Policies**

Whitfield County Transit System is not a fixed route service provider.

## **Appendices**

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: WHITFIELD COUNTY TRANSIT SYSTEM SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

# **Appendix A**

## **FTA Circular 4702.1B Reporting Requirements for Transit Providers**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

### **General Requirements**

*All recipients must submit:*

- ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ☐ Title VI Complaint Form
- ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ☐ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- ☐ **A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
- ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ☐ Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

### **Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
- ☐ Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:*

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy

Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.

# **Appendix B**

## **Current System Description**

### Current System Description

- 1) An overview of the organization including its mission, program goals and objectives.  
Whitfield County Transit System's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
- 2) Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.  
Whitfield County Transit System's is a non-profit organization. Our organization is made up of 11 full-time employees. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to the County Administrator. The Director of Transit reports directly to the Board of Commissioners. Our BOC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BOC's approved Operations Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2011 Transit Development Plan (page 201) and 2014 Operations Handbook. We will continue to operate at previous year (2020) service hours averaging 60 total fleet service hours per day or approximately 18,000 annual service hours (assuming 300 operating days).
- 3) Indicate if your agency is a government authority.  
Whitfield County Transit System operates as a non-profit government entity that operates under the Whitfield County Board of Commissioners (BOC).
- 4) Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
Whitfield County Transit System's supervisor is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Transportation Services Supervisor along with the BOC is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Supervisor's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
- 5) Who provides vehicle maintenance and record keeping?  
Maintenance on agency vehicles is provided by Whitley's Auto Service Inc., and National Bus Inc. who employs ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located

at 136 Gillespie Drive, Dalton GA 30720 and are maintained by the Diane Franklin, Transit Director. All records are maintained and retained for a minimum of four (4) years.

6) Number of current transportation related employees.

Our transportation department has a total of 11 employees that include: **ten** (7) full-time drivers, (zero) 0 part-time drivers, (one) 1 administrators and two (3) support staff.

7) Who will drive the vehicle, number of drivers, CDL certifications, etc.?

All current drivers have completed the required safety and drivers training requirements deemed necessary to be eligible to drive the agency vehicles and all the current routes within our system. All drivers are required to carry a Commercial Driver's License with Passenger Endorsement which allows coverage of all of our current fleet of buses.

8) A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to all consumers within Whitfield County. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, education, employment, social and recreation. Currently, we utilize (ten) 10 Shuttle Buses each with (sixteen) 16 passenger capacity all of which are equipped with a service lift to accommodate passengers who require wheelchair services. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 50 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.



# **Appendix C**

## **Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter**

# Agenda Item

- ☐ Work Session  
☐ Special Called Meeting  
☒ Regular Business Meeting

Meeting Date:	April 12, 2021
Subject:	Whitfield County Transit Title VI Program 2021 Update
Department:	Whitfield County Transit Service
In Budget Amount: Operating-	Capital-
Expenditure Line Item #	
Not in Budget Amount:	
Funding Source:	

Date needed:	April 12, 2021
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Whitfield County Board of Commissioners  
 301 W. Crawford Street  
 Dalton, Georgia 30720  
 Phone: 706-275-7507  
 Fax: 706-275-7540

History/Facts/Issues: This is your opportunity to explain the who, what, when, where, and why.
<p>The Whitfield County Transit Service, being federally funded, is required to update the Title VI Program on a triennial basis.</p> <p>Title VI Program at a Glance:</p> <ul style="list-style-type: none"> <li>•Identifies Whitfield County's nondiscrimination guidelines and protocols</li> <li>•Informs transit riders of the rights protected under Title VI</li> <li>•Maps out the county based on various demographics that are reported to the state</li> <li>•Details funding sources and percent allocated</li> <li>•Provides operational breakdown of personnel and equipment</li> </ul> <p>Past Title VI Updates:</p> <ul style="list-style-type: none"> <li>•First adopted in 2015</li> <li>•Updated December 2018</li> </ul> <p>2021 Changes:</p> <ul style="list-style-type: none"> <li>•Maps have been updated to reflect most recent Census data</li> <li>•Federal Fiscal Year 2021 5311 Grant Information has been included</li> <li>•Transit operational breakdown and structure has been revised</li> </ul>
Suggested Motion:
Approve the plan, as show, and submit to GDOT and FTA.

Request Made By:	Diane Franklin
County Administrator's Recommended Action:	

Clerk Use ONLY

Motion/Second:	Approved:	Date:

\*Meeting Minutes are available at <http://www.whitfieldcountyga.com/boc/minutes.htm>

# **Appendix D**

## **Title VI Sample Notice to Public**

## **Notifying the Public of Rights Under Title VI**

### **Whitfield County Transit System**

- Whitfield County Transit System 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 Whitfield County Transit System.
- For more information on Whitfield County Transit System's civil rights program, and the procedures to file a complaint, contact 706-876-2592, (TTY 706-275-7507); email [jbearden@whitfieldcountyga.com](mailto:jbearden@whitfieldcountyga.com); or visit our administrative office at 201 South Hamilton Street, Dalton, GA 30720. For more information, visit <http://www.whitfieldcountyga.com/transit.htm>.
- If information is needed in another language, contact 706-275-7507  
Si necesita información en español llame al 706-275-7507
- You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE, Washington, DC 20590

## **Notificando al Público de Derechos Bajo el Título VI**

### **Servicios de Tránsito del Condado de Whitfield**

- El Condado de Whitfield opera sus programas y servicios, sin distinción de raza, color, y origen nacional, de acuerdo con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que ella o él ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Condado de Whitfield.
- Para obtener más información sobre el programa de derechos civiles del Condado de Whitfield, y los procedimientos para presentar una queja, comuníquese al 706-275-7507, correo electrónico [jbearden@whitfieldcountyga.com](mailto:jbearden@whitfieldcountyga.com) o visite nuestra oficina administrativa en el 201 South Hamilton Street, Dalton, GA 30720. Para obtener más información, visite nuestra página de internet, <http://www.whitfieldcountyga.com/transit.htm>.
- Si necesita información en otro idioma, contacte 706-275-7507.
- También puede presentar su queja directamente con el Oficina de Administración Federal de Tránsito, Oficina de Derechos Civiles:  
Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator,  
East Building, 5th Floor - TCR  
1200 New Jersey Ave. SE, Washington, DC 20590

# **Appendix E**

## **Title VI Complaint Form**

# Whitfield County Transit System

## Title VI Complaint Form

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

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

You may attach any written materials or other information that you think is relevant to your complaint.  
Signature and date required below

\_\_\_\_\_  
Signature Date

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

Jacob Bearden – Title VI Liaison  
(706) 876-2592  
201 South Hamilton Street  
Dalton, Georgia 30720

# Sistema de Transportacion de el Condado de Whitfield

## Documento Titulo VI

<b>Sección I:</b>				
<b>Nombre:</b>				
<b>Dirección:</b>				
<b>Teléfono (Casa):</b>			<b>Teléfono (Trabajo):</b>	
Correo electrónico :				
Formato Accesible Requerido?	Impresiones Grande		<b>Cinta de audio</b>	
	TDD		<b>Otro</b>	
<b>Sección II:</b>				
¿Está presentando esta queja en su propio nombre?			Si*	No
*Si usted contestó "Si" a esta pregunta, pase a la Sección III.				
Si no es así, por favor indique el nombre y la relación de la persona para la cual se está quejando:				
Por favor, explique por qué usted se ha presentado para un tercero:				
Por favor, confirme que ha obtenido el permiso de la persona perjudicada, si usted está presentando en nombre de un tercero.			Si	No
<b>Sección III:</b>				
Creo que la discriminación que experimenté fue basado en (Marque todo lo que corresponda):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional <input type="checkbox"/> Edad <input type="checkbox"/> Discapacidad <input type="checkbox"/> Estado Familiar o Religiosa <input type="checkbox"/> Otra (Explique) _____				
Fecha de la discriminación Presunta (Mes, Día, año): _____				
Explique lo más claramente posible lo que paso y por qué cree que fue discriminado. Describa todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discriminaron es su contra (si se conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, por favor utilice el reverso de este formulario.				
_____ _____				
<b>Sección IV</b>				
¿Ha presentado previamente una queja del Título VI con esta agencia?			Si	No
<b>Sección V</b>				



¿Ha presentado esta queja ante cualquier otra agencia Federal, Estatal o local, o con cualquier corte Federal o Estatal?

☐ Si ☐ No

En caso afirmativo, marque lo que corresponda:

☐ Agencia Federal: \_\_\_\_\_

☐ Corte Federal \_\_\_\_\_

☐ Agencia Estatal \_\_\_\_\_

☐ Corte Estatal \_\_\_\_\_

☐ Agencia Local \_\_\_\_\_

Por favor proporcione información sobre una persona de contacto en la agencia/corte donde se presentó la queja.

**Nombre:**

**Titule:**

**Agencia:**

**Dirección:**

**Teléfono:**

#### **Sección VI**

Nombre de la agencia que la queja es en contra:

Persona de Contacto:

Título:

Numero de Teléfono:

Usted puede adjuntar cualquier material escrito o cualquier otra información que usted piense que es relevante para su queja.

Firma y Fecha se requiere abajo

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor entregue este formulario en persona a la dirección abajo, o envíe este formulario a:

Jacob Bearden – Title VI Liaison  
201 South Hamilton Street  
Dalton, Georgia 30720

# **Appendix F**

## **Public Participation Plan (PPP)**

## Introduction

The Public Participation Plan (PPP) for Whitfield County Transit System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Whitfield County Transit System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Whitfield County Transit System services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Whitfield County Transit System also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, and community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

## Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Whitfield County Transit System and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Whitfield County Transit System will proactively reach out and engage low-income, minority, and LEP populations for the Whitfield County Transit System service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Whitfield County Transit System will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

## Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Whitfield County Transit System. Whitfield County Transit System intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Whitfield County Transit System will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Whitfield County Transit System website (<http://www.whitfieldcountygga.com/transit>) and all feedback on the site will be recorded and passed on to

Whitfield County Transit System management. The public will also be able to call the Whitfield County Transit System office at 706-278-3606 during its hours of operation. Feedback collected over the phone will be recorded and passed on to the Transit System management group. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Whitfield County Transit System will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

### Public Hearing

Whitfield County Transit System is not required to perform public hearings.

# **Appendix G**

## **Language Assistance Plan (LAP)**

## **I. Introduction**

Whitfield County Transit System operates a transit system within Whitfield County area. The Language Assistance Plan (LAP) has been prepared to address Whitfield County Transit System’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Whitfield County Transit System service area there are 15,042 residents or 14.4% who describe themselves as not able to communicate in English “very well” (Source: US Census). Whitfield County Transit System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Whitfield County Transit System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) “ (hereinafter “Handbook”), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Whitfield County Transit System be able to communicate effectively with all of its riders. When Whitfield County Transit System is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Whitfield County Transit System is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency’s services in accordance with Title VI.

This plan will demonstrate the efforts that Whitfield County Transit System undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

Identification: Identifying LEP populations in service areas

Notification: Providing notice to LEP individuals about their right to language services

Interpretation: Offering timely interpretation to LEP individuals upon request

Translation: Providing timely translation of important documents

Staffing: Identifying Whitfield County Transit System staff to assist LEP customers

Training: Providing training on LAP to responsible employees.

## **II. Four Factor Analysis**

The analysis provided in this report has been developed to identify LEP population that may use Whitfield County Transit System services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Whitfield County Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Whitfield County Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Whitfield County Transit System to the LEP population.
4. The resources available to Whitfield County Transit System and overall costs to provide LEP assistance

**a. Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 104,658 residents in the Whitfield County Transit System service area 15,042 residents describe themselves as speaking English less than “very well”. People of hispanic descent are the primary LEP persons likely to utilize Whitfield County Transit System services. For the Whitfield County Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 50.4% speak English “very well”. For groups who speak English “less than very well”, 13.5% speak [Spanish] and 0.01% speak [All Other].

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Whitfield County Transit System service area.

**b. Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Whitfield County Transit System has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that the Spanish speaking population is the most prominent in the serviced area. Phone inquiries and staff survey feedback indicated that Whitfield County Transit System dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past six years, Whitfield County Transit System has had zero requests for translated documents.

c. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People's Lives**

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board passenger survey was conducted to collect data on usage of and access to the Whitfield County Transit Service. According to the survey, the most common age among all the participants in the survey was 65 or older. This supports the fact that Whitfield County Transit Service can be considered a senior transit service as most of its patrons are over the age of 65.

Whitfield County Transit System operates only a Demand Response service for Whitfield County residents.

d. **Element 4: Providing Note to LEP Persons**

Whitfield County Transit System will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Whitfield County Transit System office lobby, and on the buses. Additionally, 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.

e. **Element 5: Monitoring and Updating the Plan**

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Whitfield County Transit System financial resources are sufficient to fund language assistance resources needed

Whitfield County Transit System understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Whitfield County Transit System is open to suggestions from all sources, including customers, Whitfield County Transit System staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

### **III. Safe Harbor Provision**

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population.



The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Whitfield County Transit System service area does have LEP populations which qualify for the Safe Harbor Provision. The Spanish LEP population is 15.5%.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Whitfield County Transit System may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

**Appendix H**

**Operating Area Language Data:**

**Whitfield County Transit System Service**

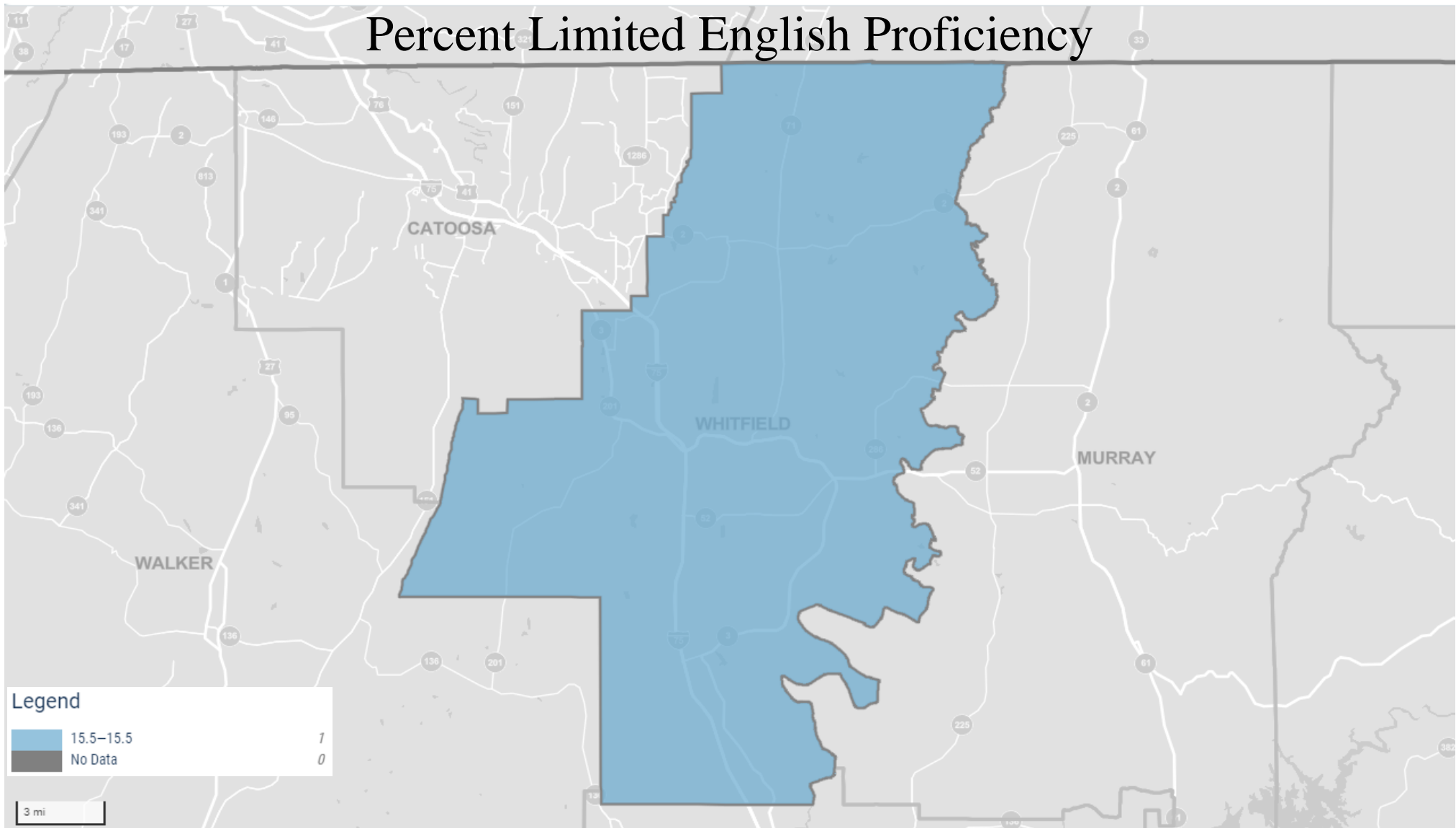
**Area**

	Whitfield County, Georgia											
	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	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	97,286	±46	(X)	(X)	82,244	±966	84.5%	±1.0	15,042	±963	15.5%	±1.0
Speak only English	66,953	±1,250	68.8%	±1.3	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	30,333	±1,253	31.2%	±1.3	15,291	±1,072	50.4%	±2.6	15,042	±963	49.6%	±2.6
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	28,553	±1,281	29.3%	±1.3	14,477	±1,061	50.7%	±2.8	14,076	±969	49.3%	±2.8
5 to 17 years old	8,496	±631	8.7%	±0.6	6,832	±687	80.4%	±5.7	1,664	±511	19.6%	±5.7
18 to 64 years old	18,997	±819	19.5%	±0.8	7,607	±750	40.0%	±3.2	11,390	±690	60.0%	±3.2
65 years old and over	1,060	±82	1.1%	±0.1	38	±32	3.6%	±3.0	1,022	±87	96.4%	±3.0
Other Indo-European languages	974	±283	1.0%	±0.3	498	±152	51.1%	±18.2	476	±265	48.9%	±18.2
5 to 17 years old	100	±69	0.1%	±0.1	66	±61	66.0%	±47.3	34	±53	34.0%	±47.3
18 to 64 years old	730	±220	0.8%	±0.2	332	±151	45.5%	±24.2	398	±242	54.5%	±24.2
65 years old and over	144	±85	0.1%	±0.1	100	±80	69.4%	±35.1	44	±55	30.6%	±35.1
Asian and Pacific Island languages	562	±221	0.6%	±0.2	223	±120	39.7%	±11.8	339	±135	60.3%	±11.8
5 to 17 years old	76	±60	0.1%	±0.1	49	±45	64.5%	±31.5	27	±31	35.5%	±31.5
18 to 64 years old	346	±158	0.4%	±0.2	116	±79	33.5%	±13.7	230	±104	66.5%	±13.7
65 years old and over	140	±92	0.1%	±0.1	58	±56	41.4%	±27.8	82	±60	58.6%	±27.8
Other languages	244	±264	0.3%	±0.3	93	±130	38.1%	±48.6	151	±217	61.9%	±48.6
5 to 17 years old	141	±170	0.1%	±0.2	40	±61	28.4%	±48.5	101	±154	71.6%	±48.5
18 to 64 years old	97	±99	0.1%	±0.1	47	±69	48.5%	±49.9	50	±65	51.5%	±49.9
65 years old and over	6	±10	0.0%	±0.1	6	±10	100.0%	±100.0	0	±31	0.0%	±100.0
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	63,531	±812	(X)	(X)	60,508	±692	95.2%	±0.7	3,023	±443	4.8%	±0.7
Speak only English	54,189	±636	85.3%	±1.2	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	9,342	±843	14.7%	±1.2	6,319	±678	67.6%	±3.8	3,023	±443	32.4%	±3.8
Spanish	8,430	±842	13.3%	±1.2	5,782	±697	68.6%	±4.2	2,648	±430	31.4%	±4.2
Other languages	912	±199	1.4%	±0.3	537	±190	58.9%	±16.5	375	±164	41.1%	±16.5

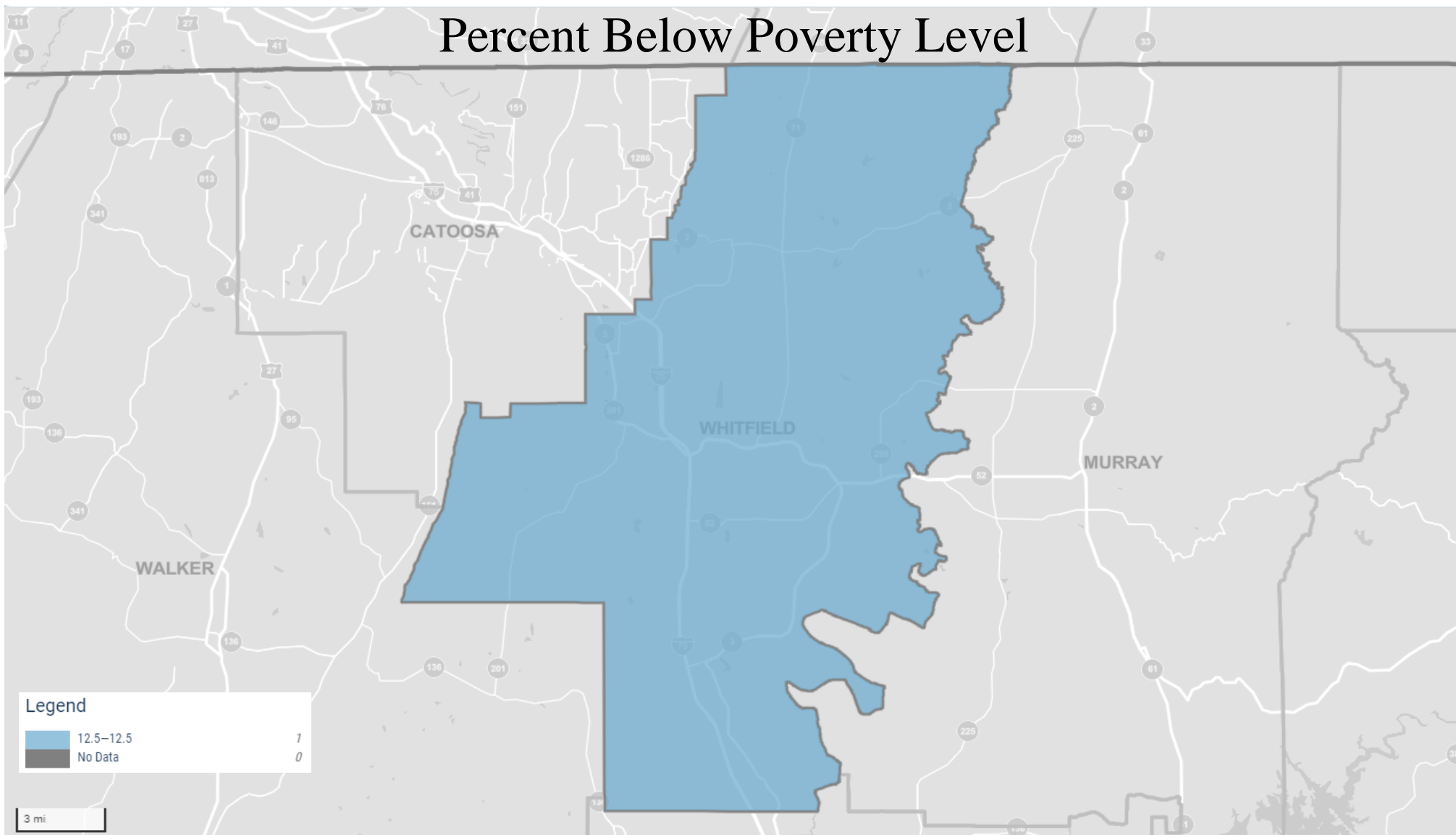
# **Appendix I**

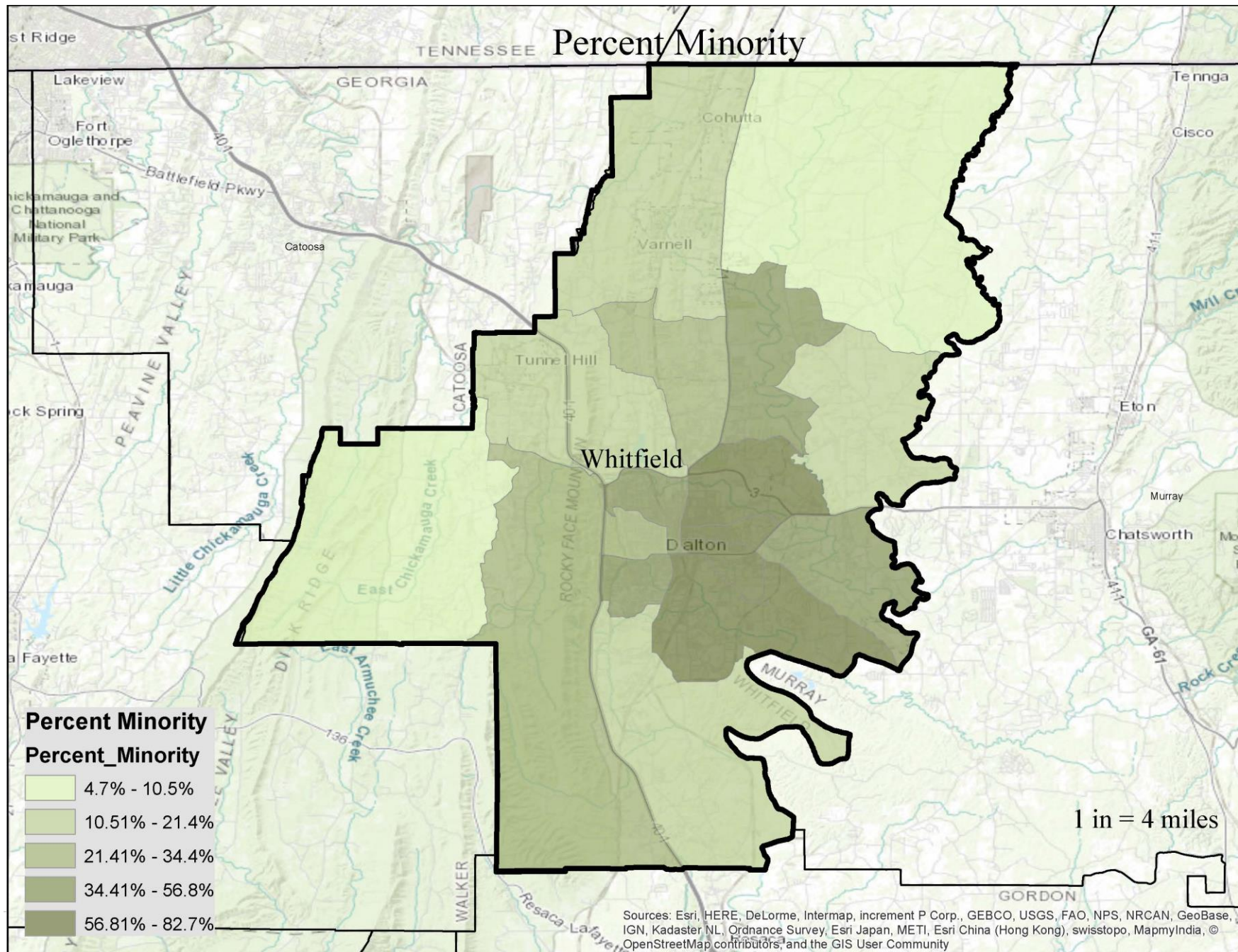
## **Demographic Maps**

# Percent Limited English Proficiency



# Percent Below Poverty Level





# **Appendix J**

## **Title VI Equity Analysis**



Whitfield County Transit System has not performed Title VI Equity Analysis. WCTS is committed to public outreach and maintaining good public relations. Prior to any change in rate, the public shall be notified and allowed sufficient time to provide comments and/or concerns. All comments and/or concerns will be reviewed and evaluated by the Transit Advisory Committee prior to any action being taken by the Whitfield County Board of Commissioners. If Whitfield Transit is considering a service or fare change, the public outreach must take place to ensure that minority or low-income populations are not adversely affected by proposed changes.