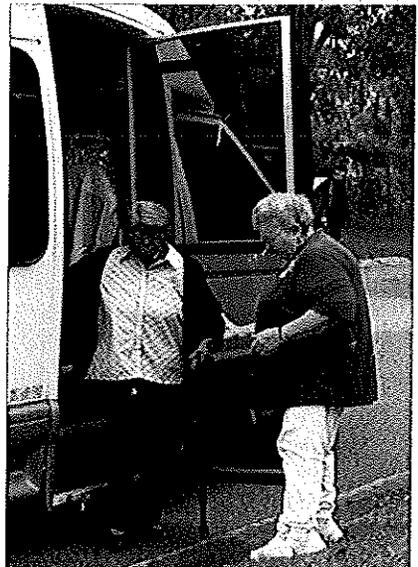


HARALSON COUNTY TRANSIT



Title VI Plan

DECEMBER 15, 2018



Preface

This template has been developed by the Georgia Department of Transportation (GDOT) Transit division in order to assist transit agencies with the development of their Title VI Plan. Although each agency is different in size, organization structure, operations, etc., minimum Title VI compliance requirements are common to all. This template document is intended to assist smaller transit agencies that often do not have adequate resources to develop a Title VI Plan in accordance with the minimum requirements of Section 49 Code of Federal Regulations, Part 21 and Federal Transit Administration (FTA) Circular 4702.1B. It should be noted that this template covers the Title VI requirements for sub-recipient transit providers that operate less than 50 vehicles in peak service and are located in urbanized areas (UZA) of less than 200,000 population and rural transit providers.

While the development, adoption, and implementation of a Title VI Plan that complies, at a minimum, with the requirements set forth by FTA Circular 4702.1B is mandatory, the agencies have the prerogative to either utilize this template or enhance their existing Title VI Plan with the information contained in this document. If an agency decides to utilize this template, they will have to customize this document to fit their agency ensuring compliance with FTA Circular 4702.1B, adopt the document, and implement and comply with the Title VI Plan.

It is important to note that the Department is not requiring transit agencies to adopt this template. Transit agencies must, however, adopt a Title VI Plan which addresses all of the requirements of FTA Circular 4702.1B which apply to their agency. The intent of the Department was to develop a document which addresses the provisions of the circular and provide it to local transit agencies as a means of helping them reduce their administrative burden in preparing or updating their Title VI Plans. We believe this document will be invaluable to you in this regard. In developing this document, it was understood that some transit agencies may elect to adopt the template document in whole with little customization. This decision is up to the local transit agency. It must be understood, however, that future compliance reviews will examine your policies and observed practices to ensure that they are consistent with the Title VI Plan you have adopted, and also compliant with FTA Circular 4702.1B.

To use this template, open the electronic file and save the file with an appropriate name (e.g. "Your Transit System Bus System Title VI Plan.doc"). You will quickly note that the Template Document has been color coded to help you distinguish between the actual requirements of FTA Circular 4702.1B, and optional language we have provided that might assist you in developing your plan, or elaborating on how your agency is addressing the requirements of FTA Circular 4702.1B.

Text Any text highlighted in yellow color should be replaced with your agency's information.

 Any text highlighted in blue color are instructions for completion of the template. Please delete all blue highlighted text prior to completion of the Plan.

 Text appearing within the blue shaded boxes is informational only and may provide instructions or other information that will help you in customizing your Title VI Plan.

Text Any text appearing in green color represents optional or suggested language that may assist you in explaining or elaborating on how you are meeting the intent of the requirement.

 Text appearing within the bordered boxes as well as the black text found within the section descriptions which follow, represent the actual requirements as stated in FTA Circular 4702.1B, or provides information directly related to the requirements.

Certain FTA Circular 4702.1B requirements are very prescriptive and the requirements are defined in great detail. Under these circumstances, it would be redundant to explain the requirements twice (once in the bordered box and then restate again within the general text that would follow). When such circumstances occur, it will be noted within the bordered box and the general text will be deferred to in summarizing the

requirement.

Remember, in the context of FTA Circular 4702.1B, some requirements are not always prescriptive and detailed. Some portions of FTA Circular 4702.1B simply obligate the agency to define or develop a policy or procedure to explain how the agency will meet the intent of the requirement. The language the Department has developed in the green colored text is optional or example language crafted to assist you in these instances. *You are not required to use it.* Whether you elect to use the optional green text is entirely up to you, but please ensure that any green text utilized applies precisely to your agency. Regardless, your policy or procedure must comply with the requirements set forth by FTA Circular 4702.1B. Also, note that this Template is geared towards satisfying the requirements of FTA Circular 4702.1B only. You may have to incorporate additional policies and procedures to meet the requirements of other regulatory agencies, as appropriate. You can also customize the Appendices as needed to supplement the Title VI Plan. The document is provided in a format that is easily editable by the Agencies, a text formatting palette has been provided in the Appendix of the document specifying font type, text size, etc.

This template was created by the Florida Department of Transportation, modified and adopted for use by the Georgia Department of Transportation.

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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

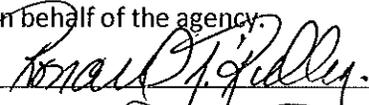
49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Haralson Transit 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.

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

1. 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.
2. 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.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Haralson County Transit.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. 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.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. 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: Ronald J. Ridley, Chairman / CEO

2.0 Introduction & Description of Services

This is a section of the plan which covers general information about the transit agency.

Haralson County Transit 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.

Haralson County Transit is a sub-recipient of FTA funds and provides service in Haralson County. A description of the current Haralson County Transit system is included in Appendix B.

Title VI Liaison

Bruce Poteat, Transit Director
Haralson County Transit
155 Van Wert Street
Buchanan, GA 30113

Alternate Title VI Contact

Alison Palmer, Certified County Clerk
Haralson County
155 Van Wert Street
770-646-2002
770-646-2035 (FAX)

Haralson County Transit 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:

- ① Maintain knowledge of Title VI requirements.
- ① Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- ① Disseminate Title VI information to the public including in languages other than English, when necessary.
- ① 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.
- ① Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

Haralson County Transit is not a first time applicant for FTA/GDOT funding.

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

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

2.2 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.

Haralson County Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on 9/5/19. The Plan was approved and adopted by Haralson County Board of Commissioners during a meeting held on November 5, 2019. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to 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:

- ① A statement that the agency operates programs without regard to race, color and national origin
- ① A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- ① 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. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Haralson County Transit 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 Haralson County Transit's office including the reception desk and meeting rooms, and on the Haralson County Transit's website at Haralson.gov. Additionally, Haralson County Transit will post the notice on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

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

Once the complaint is received, Haralson County Transit 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.

Haralson Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Haralson Transit 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, Haralson Transit 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 Haralson Transit's website Haralson.gov.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and Haralson County Transit at www.Haralsoncountyga.gov.

4.3 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. Haralson Transit 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.

4.4 Sub-recipient Assistance and Monitoring

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

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Haralson Transit 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 Haralson Transit 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.

Haralson Transit 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	n/a			
1.				
2.				
Lawsuits	n/a			
1.				
2.				
Complaints	n/a			
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Haralson Transit 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 Haralson. 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 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

Haralson Transit 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 Haralson Transit's recent, current, and planned outreach activities.

- Transit Website lists information on Public Transportation Services

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Haralson Transit System operates a transit system within Haralson County. The Language Assistance Plan (LAP) has been prepared to address Haralson 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.

Haralson 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. Haralson 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.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Haralson County Transit System does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

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

10.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX D	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: HARALSON COUNTY TRANSIT SERVICE
AREA APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS
APPENDIX K	TEXT FORMATTING PALETTE

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

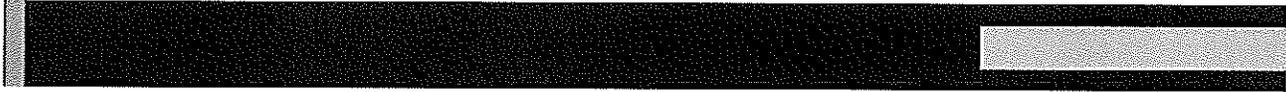
All recipients must submit:

- ❖ 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)

Appendix B

Current System Description

1. Haralson 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. Haralson County Transit System is a non-profit 501(c)(3) organization. Our organization is made up of four full-time, one part-time employees. Our Manager is responsible for all of the day-to-day operations of our organization and reports directly to Haralson County Sole Commissioner. Our Commissioner is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program.
3. Haralson County Transit is a non-profit organization. Our organization is made up of four (4) full-time employees and one (1) part-time employee. Haralson County Transit has 1 Director, 3 full-time drivers, and 1 part-time driver. Our Director is in direct contact with the Haralson County Board of Commissioner's Chairman and the Clerk. Transportation services are provided in accordance with FTA and DOT requirements. Our transportation system is operated as follows: our services are available by appointment from Monday-Thursday 7:00 a.m. – 5:30 p.m. and are available to any resident through the County. Haralson Transit currently provides four (4) buses and (1) mini-van.
4. Haralson County Transit System's manager 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 have 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 Transit Director is responsible for annual renewal of all liability insurance all transit program vehicles. It is the Transit Director's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Maintenance on all agency vehicles is provided by Haralson County Government's Fleet Maintenance. Fleet Maintenance employs only ASE certified technicians with experience in working on commercial passenger vehicles. 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 1801 Macedonia Church Road, Buchanan, GA 30119 and are maintained by the Manager. All records are maintained and retained for a minimum of four (4) years.

- 
6. Haralson Transit has a total of 7 employees that include: 3 full-time drivers, 3 part-time drivers, 1 administrator and 1 support staff.
 7. Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles.
 8. Transportation services provided through our program are available to Haralson County residents. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. The 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



Russell R. McMurry, P.E., Commissioner
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308
(404) 631-1990 Main Office

Via E-mail transmission

September 5, 2019

Ms. Allison Palmer, County Clerk
Haralson County
P.O. Box 489
Buchanan, GA 30113

Dear Ms. Palmer

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ms. Michele Nystrom, Transit Compliance and Asset Manager directly at (404) 631-1235 or at mnystrom@dot.ga.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Trainer', is written over a horizontal line.

Leigh Ann Trainer, Transit Program Manager
Division of Intermodal

cc: Michele Nystrom, Transit Compliance and Asset Manager
Patricia Smith, Program Delivery Manager
Freida Black, Assistant Program Delivery Manager, District Six



HARALSON COUNTY BOARD OF COMMISSIONERS
NOVEMBER 5, 2019
REGULAR MEETING MINUTES

Chairman Ridley called the regular meeting of the Haralson County Board of Commissioners to order. All Commissioners and County Attorney David Mecklin were present. Sandi Couch offered the Invocation and the Board led the Pledge of Allegiance.

Chairman's Report

Chairman Ridley reported that Danny Crook has passed away and asked that his family be kept in everyone's thoughts and prayers. The chairman noted that the paving had started on Old Bushmill Road and said that Pope Lake Road would be next. Chairman Ridley stated that there was a miscommunication with Mrs. Brown of Animal Control. He reported that the state had come for an unexpected inspection of the Animal Control facility and they gave excellent ratings. Mrs. Brown will update at the next meeting.

Finance Director, Don Johnson, reviewed the financials for the board. Chairman Ridley followed up with the fact that the county has not had to get a Tax Anticipation Note (TAN) for two years in a row. This is the first time in 16 years that this has been the case.

Minutes

Chairman Ridley stated that the minutes from the October meetings had been sent to the board for review. He asked if there were any changes to be made. There were none. Commissioner Brown motioned to approve the minutes of the October 1, 2019 regular meeting and the October 15, 2019 Work session as written. Commissioner Budde seconded and the motion carried 5-0.

Agenda

Chairman Ridley stated he would like to add an item to the agenda. He asked to make #9 the IT Proposal and move the executive session to #10.

Commissioner Brown motioned to approve the agenda as amended. Commissioner Budde seconded and the motion carried 5-0.

Chairman Ridley stated that we had a guest. Mr. Glen Simmons had asked to address the board. Mr. Simmons stated that he wanted to publicly apologize for the statements he made

on Facebook directed at the Board of Commissioners several months ago. He asked them to forgive him. The board thanked him for the apology and told him they appreciated it.

Public Participation on Agenda Items

None

Item #1 – Honda Precision Parts-Georgia Expansion – Eric McDonald

Eric McDonald explained the expansion to the Honda Precision parts facility in Tallapoosa. He explained that they are phasing out the 6 speed transmissions and will begin manufacturing the phase two 10 speed transmissions. This will not add to the jobs, but will maintain those already there and will add to the machinery and equipment at the location. The new abatement will not incorporate any of the older ones. They will still go back on the digest as originally agreed. This is a \$41 million expansion. This was a competitive process. Haralson County beat out two other possible expansion locations.

Item #2 – DFACS Board Appointment

This appointment is to fill the unexpired term of Joyce Wilson. The term ends June 30, 2022. Commissioner Brown nominated Suzy Vines.

Chairman Ridley motioned to close nominations. Commissioner Budde seconded and the motion carried 5-0.

Commissioner Brown motioned to accept Suzy Vines appointment by acclamation. Chairman Ridley seconded and the motion carried unanimously.

Item #1 revisited

County Attorney David Mecklin stated that the board needed to go back to Item #1 and take a vote.

Chairman Ridley motioned to allow the Chairman to sign the Honda contract after it had been approved and finalized by the Board of Assessors and the Board of Education. Commissioner Tarpley seconded and the motion carried 5-0.

Commissioner Budde expressed his appreciation to Mr. McDonald for the Development Authority's work to obtain this expansion.

Item #3 – Region 1 EMS Appointment

Chairman Ridley reminded the board that there were some specific qualifications for this position and that Chief Brian Walker was currently holding the position. He nominated Brian Walker to be reappointed to this position. There were no other nominations. Chairman Ridley motioned to approve the reappointment of Brian Walker to the Region 1 EMS board.

Commissioner Budde seconded and the motion carried 5-0.

Item #4 – Codes Enforcement Mandatory Updates

County Attorney David Mecklin explained the ordinance update and explained the wording of this ordinance. He stated that the way it is worded would allow the building inspector to use the most recent updates from the state without the entire ordinance being redone in the future.

Commissioner Tarpley motioned to approve the Ordinance of Haralson County Re-Adopting Haralson County Technical Codes. Chairman Ridley seconded and the motion carried 5-0.

Item #5 – Regional Advisory Council for Behavioral Health and Developmental Disabilities Appointment

This appointment had been discussed in a couple of previous meetings. Commissioner Tarpley stated that he had a nominee in mind, but the man was unable to attend the meetings at this time due to his current job.

Commissioner Budde nominated Commissioner Jamie Brown. With no other nominations, Chairman Ridley motioned to close nominations. Commissioner Budde seconded and the motion carried unanimously.

Chairman Ridley motioned to appoint Commissioner Brown to the Regional Advisory Council for Behavioral Health and Developmental Disabilities by acclamation. Commissioner Vines seconded and the motion carried 4-0, with Commissioner Brown abstaining.

Item #6 – Title VI Plan Mandatory Update

County Clerk Alison Palmer explained that this is an update to the Civil Rights plan the county adopted pertaining to the transit program. Attorney Mecklin stated that this is mandatory if the program has funding from the state and federal government.

Commissioner Budde motioned to approve the update to the Title VI plan. Chairman Ridley seconded and the motion carried 5-0.

Item #7 – Fire Station 8 SPLOST request

Chairman Ridley stated that the new station 8 in Tallapoosa needs to have a drive paved from the road to the back of the station. The quote for cement is \$24,000. There is only \$14,000 left in the capital account for that station. They are requesting that the \$10,000 balance be paid from SPLOST. Discussion followed that included getting more than one quote, getting quotes for asphalt instead of cement, approved usages of SPLOST funds, etc. Chairman Ridley stated that his concern with using SPLOST is that it would be coming out of the unincorporated portion and it is possible for the City of Tallapoosa to take the fire department back over at a later date.

Chairman Ridley motioned to table this temporarily and get quotes for asphalt and possibly more cement quotes. Commissioner Brown seconded and the motion carried unanimously.

Item #8 – Fire Personal Protection Equipment Bid Award (Paid with Assistance for Firefighters Grant)

Chief Walker stated that the county had been awarded a grant for \$97,000 for turnout gear. An RFP was put out and 4 bids were received ranging from \$95,000 to \$126,000. Fuller Fire had the \$95,000 bid. Firemaster is in the county but their bid was more than 7% more than Fuller. Commissioner Tarpley asked if there were any matching fund requirements. Chief Walker stated that it is 10%, which would come out of SPLOST. Commissioner Budde commended the Chief for getting this grant.

Commissioner Budde motioned to award the Fire Personal Protection Equipment Bid to Fuller Fire. Chairman Ridley seconded and the motion carried 5-0.

Item #9 – IT Proposals

Chairman Ridley stated that we had received four proposals to the IT RFP. One was only the phone and one was \$377,000 and required changing out all of the computers and phones throughout the county. He asked County Clerk, Alison Palmer, to review the RFPs received. Mrs. Palmer reiterated that there were four proposals received and questions from several other companies. One was for phone and internet only, not the whole RFP. One was very high and would require changing all the computers to Chromebooks and an entire new phone system. That narrowed it down to two proposals. One was from Transamerica and one from the current provider, Digital Agent. Mrs. Palmer stated that all four bids were reviewed by the chairman and the entire staff at the commission office.

Chairman Ridley added that we were still continuing to get clarification on one quote late this afternoon. One major concern was that the Transamerica bid only included 40 hours of support each month and all hours over that would be \$120 each. Alison had asked the current provider how many hours a month we usually need, without explaining why she was asking. They stated 60 was an average month.

After comparing the quotes, Transamerica would be \$125,000 per year with just 40 hours of support monthly and Digital Agent would be \$129,000 without a limit put on support. If you used the 60 month average, the Transamerica bill would end up being approximately \$156,000.

Questions from the board and the audience were answered regarding numerous items such as cyber security, comfort level of the elected officials with the current company, security training, location of these companies, was this RFP put on the state website, etc.

Chairman Ridley motioned to accept the Digital Agent Proposal. Commissioner Vines seconded and the motion carried unanimously.

County Attorney David Mecklin asked that the motion and vote be redone to include attorney's review of the contract.

Chairman Ridley motioned to accept the Digital Agent proposal and authorize the Chairman to sign the contract, subject to review by legal counsel. Commissioner Vines seconded and the motion carried 5-0.

Public Participation on Non Agenda Items

Chairman Ridley motioned to amend the agenda and hear public participation prior to Item #10 Executive Session. Commissioner Vines seconded and the motion carried unanimously.

Jay Smith asked if the Board of Commissioners and the Board of Education meet or talk on any kind of regular basis. Various commissioners responded to Mr. Smith, with the main response being that the Board of Education is not interested in meeting with us.

Item #10 – Executive Session

Chairman Ridley motioned to go into Executive session to discuss possible land acquisition and personnel matters. Commissioner Vines seconded and the motion carried 5-0.

Upon return, Commissioner Budde motioned to reconvene the regular meeting. Commissioner Brown seconded and the motion carried 5-0.

Chairman Ridley stated that there is action to be taken from the Executive session.

Chairman Ridley motioned to appoint Glenda Wade as the Permits/Zoning Director. Commissioner Budde seconded and the motion carried 5-0.

Chairman Ridley motioned to appoint Terry Edwards as the Public Works Director. Commissioner Brown seconded and the motion carried 5-0.

Commissioner Budde motioned to adjourn. Commissioner Brown seconded and the motion carried 5-0.

Submitted by Alison Palmer
Certified County Clerk

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Haralson County Transit

- Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on 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.” (42 U.S.C. Section 2000d).
- The Civil Rights Restoration Act of 1987 clarified the broad, Institution-wide application of Title VI. Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded. The term “program or activity: means all of the operations of a department, agency, special purpose district, or government; or the entity of such State or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a State or Local government.
- Haralson County Transit operates under the authority of Haralson County Government and is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI I Federal Transit Administration (FTA) Circular 4702.1B adopted October1, 2012.
- This plan serves as a guide to Haralson County Government in its administration and management of Title VI transportation related activities.
- For more information on Haralson County Transit’s civil rights program, and the procedures to file a complaint, contact Bruce Poteat at 770-891—4903 ,(Fax: 770-646-2035); email: bpoteat@Haralsoncountyga.gov or visit our administrative office at 155 Van Wert St, Buchanan, GA 30113. For more information, visit our website www.Haralsoncountyga.gov if more information is needed in another language, contact 770-443-8873.
- 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

Appendix E

Title VI Complaint Form

Haralson County Transit

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race				
<input type="checkbox"/> Color				
<input type="checkbox"/> National Origin				
<input type="checkbox"/> Age				
<input type="checkbox"/> Disability				
<input type="checkbox"/> Family or Religious Status				
<input type="checkbox"/> Other (explain) _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV				

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Haralson County Transit 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 Haralson County Transit. 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 Haralson County Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Haralson County Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, 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 Haralson County Transit and its operations. The goals for this PPP include:

- ① **Inclusion and Diversity** Haralson County Transit will proactively reach out and engage low-income, minority, and LEP populations for the Haralson County Transit service area so these groups will have an opportunity to participate.
- ① **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.
- ① **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 services will be described in language that is clear and easy to understand.
- ① **Responsive:** Haralson County Transit will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- ① **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- ① **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 Haralson County. Haralson County Transit intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The public will be invited to provide feedback on the Haralson County Transit website (www.Haralsoncountyga.gov) and all feedback on the site will be recorded and passed on to Haralson County Transit management. The public will also be able to call the Haralson County Transit office at during its hours of operation. Feedback collected over the phone will be recorded and passed on to Haralson County Transit management. 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.

Haralson County Transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- ① In-vehicle advertisement
- ① Posters or flyers in transit center
- ① Posting information on website
- ① Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- ① Communications to relevant elected officials
- ① 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.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Haralson County Transit operates a transit system within Haralson County. The Language Assistance Plan (LAP) has been prepared to address Haralson County Transit'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 Haralson County Transit service area there are about 1,000 residents or 5% who describe themselves as not able to communicate in English "very well" (Source: US Census). Haralson County Transit 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. Haralson County Transit 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 Haralson County Transit be able to communicate effectively with all of its riders. When Haralson County Transit 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. Haralson County Transit 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 Haralson County Transit 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:

- ④ Identification: Identifying LEP populations in service areas
- ④ Interpretation: Offering timely interpretation to LEP individuals upon request
- ④ Translation: Providing timely translation of important documents
- ④ Staffing: Identifying Haralson County Transit staff to assist LEP customers
- ④ Training: Providing training on LAP to responsible employees.

I. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Haralson 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 Haralson County Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Haralson Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Haralson Transit System to the LEP population.
4. The resources available to Haralson Transit System and overall costs to provide LEP assistance
 - a. **Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population**

Of the 28,780 residents in the Haralson County Transit System service area 28,384 residents describe themselves as speaking English less than "very well". People of Hispanic descent are the primary LEP persons likely to utilize Haralson Transit System services. For the Haralson Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 98.6% speak English "very well". For groups who speak English "less than very well", 1.1% speak Spanish.

- 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.

Haralson 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 there are no prominent LEP groups meeting the Safe Harbor requirement. Phone inquiries and staff survey feedback indicated that Haralson 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 three years, Haralson Transit System has had no 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.

Haralson County provides Dial-A-Ride demand response service to county residents.

Factor 4: The Resources Available to the Recipient and Costs

Haralson Transit System does not have significant non-english speaking populations which would require translated services. The public notice contains an email and contact information for anyone requesting these services.

II. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

a. **Element 1: Identifying LEP Individuals Who Need Language Assistance**

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Haralson Transit System may identify language assistance need for an LEP group by:

1. Examining 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 or meetings.
2. Having Census Bureau Language Identification Flashcards available at Your Transit System Meetings. This will assist Your Transit System in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Your Transit System management to follow-up.

Title VI Plan

4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

As needed, Haralson Transit System will undertake the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the Your Transit System offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Haralson Transit System will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

c. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff. In the case of Haralson Transit System, the most important staff training is for Customer Service Representatives and transit drivers.

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Note to LEP Persons

Title VI Plan

Haralson Transit System will make Title VI information available in English on the Agency's website. Key documents are written in English. Notices are also posted in Haralson Transit System office lobby, on buses, and website. 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 Haralson Transit System's financial resources are sufficient to fund language assistance resources needed

Haralson 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. Haralson Transit System is open to suggestions from all sources, including customers, Haralson 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%) or 1,000 persons, whichever is less, 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.

Haralson Transit System service area does not have LEP populations which qualify for the Safe Harbor Provision. (See Appendix H)

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. Your 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:
Haralson Transit System Service Area

Title VI Plan

Language	County	Percent of Population
Total	28,780	
Speak only English	28,384	98.6
Spanish or Spanish Creole	318	1.1
Speak English "very well"		
Speak English less than "very well"		
French (incl. Patois, Cajun)		
Speak English "very well"		
Speak English less than "very well"		
French Creole		
Speak English "very well"		
Speak English less than "very well"		
Italian		
Speak English "very well"		
Speak English less than "very well"		
Portuguese or Portuguese Creole		
Speak English "very well"		
Speak English less than "very well"		
German		
Speak English "very well"		
Speak English less than "very well"		
Yiddish		
Speak English "very well"		
Speak English less than "very well"		
Other West Germanic languages		
Speak English "very well"		
Speak English less than "very well"		
Scandinavian languages		
Speak English "very well"		
Speak English less than "very well"		
Greek		
Speak English "very well"		
Speak English less than "very well"		
Russian		
Speak English "very well"		
Speak English less than "very well"		
Polish		
Speak English "very well"		
Speak English less than "very well"		
Serbo-Croatian		
Speak English "very well"		

Title VI Plan

Language	County	Percent of Population
Speak English less than "very well"		
Other Slavic Languages		
Speak English "very well"		
Speak English less than "very well"		
Armenian		
Speak English "very well"		
Speak English less than "very well"		
Persian		
Speak English "very well"		
Speak English less than "very well"		
Gujarati		
Speak English "very well"		
Speak English less than "very well"		
Hindi		
Speak English "very well"		
Speak English less than "very well"		
Urdu		
Speak English "very well"		
Speak English less than "very well"		
Other Indic languages		
Speak English "very well"		
Speak English less than "very well"		
Other Indo-European Languages		
Speak English "very well"		
Speak English less than "very well"		
Chinese		
Speak English "very well"		
Speak English less than "very well"		
Japanese		
Speak English "very well"		
Speak English less than "very well"		
Korean		
Speak English "very well"		
Speak English less than "very well"		
Mon-Khmer, Cambodian		
Speak English "very well"		
Speak English less than "very well"		
Hmong		
Speak English "very well"		
Speak English less than "very well"		
Thai		

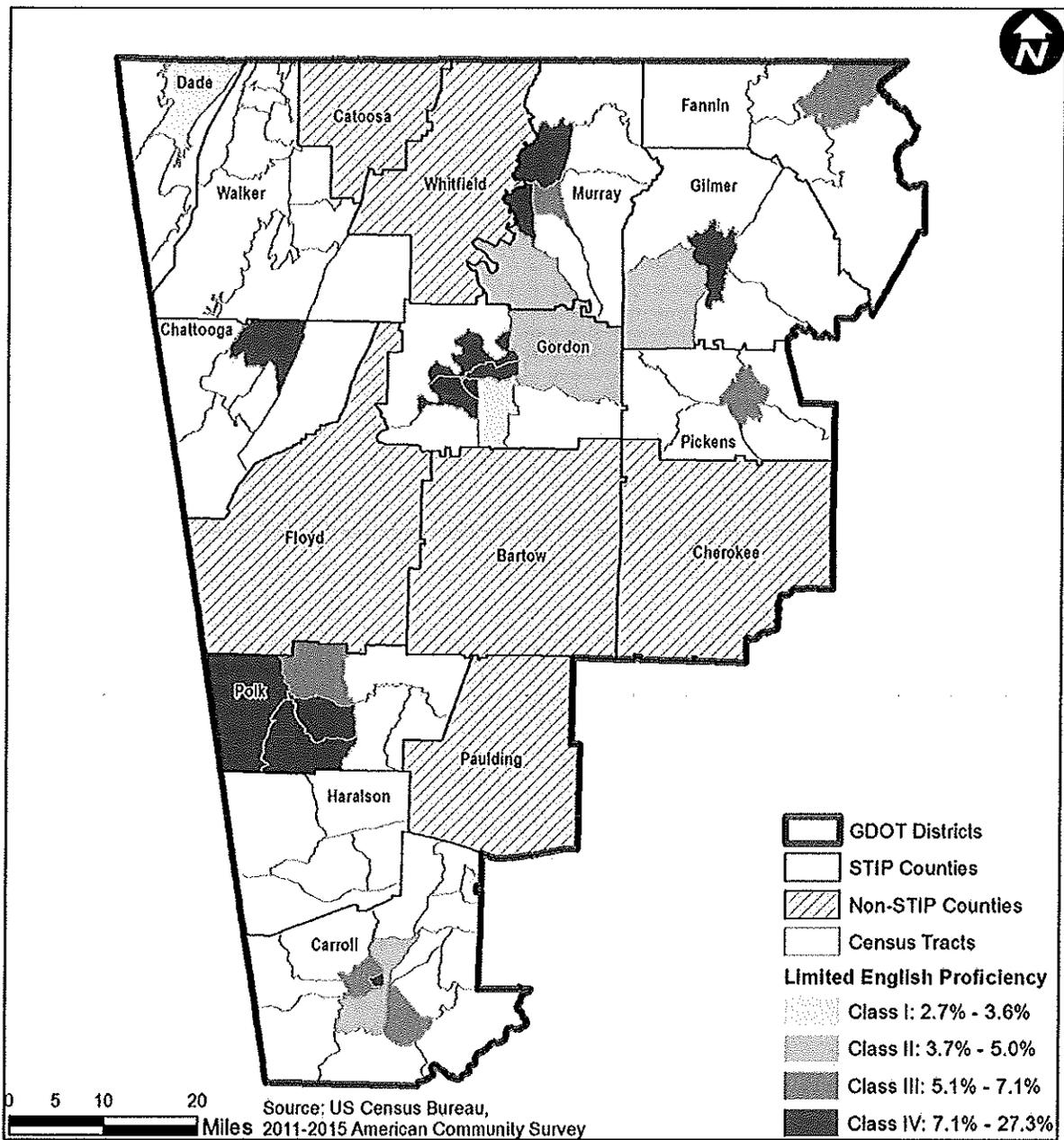
Title VI Plan

Language	County	Percent of Population
Speak English "very well"		
Speak English less than "very well"		
Laotian		
Speak English "very well"		
Speak English less than "very well"		
Vietnamese		
Speak English "very well"		
Speak English less than "very well"		
Other Asian languages		
Speak English "very well"		
Speak English less than "very well"		
Tagalog		
Speak English "very well"		
Speak English less than "very well"		
Other Pacific Island languages		
Speak English "very well"		
Speak English less than "very well"		
Navajo		
Speak English "very well"		
Speak English less than "very well"		
Other Native American languages		
Speak English "very well"		
Speak English less than "very well"		
Hungarian		
Speak English "very well"		
Speak English less than "very well"		
Arabic		
Speak English "very well"		
Speak English less than "very well"		
Hebrew		
Speak English "very well"		
Speak English less than "very well"		
African languages		
Speak English "very well"		
Speak English less than "very well"		
Other and unspecified languages		
Speak English "very well"		
Speak English less than "very well"		

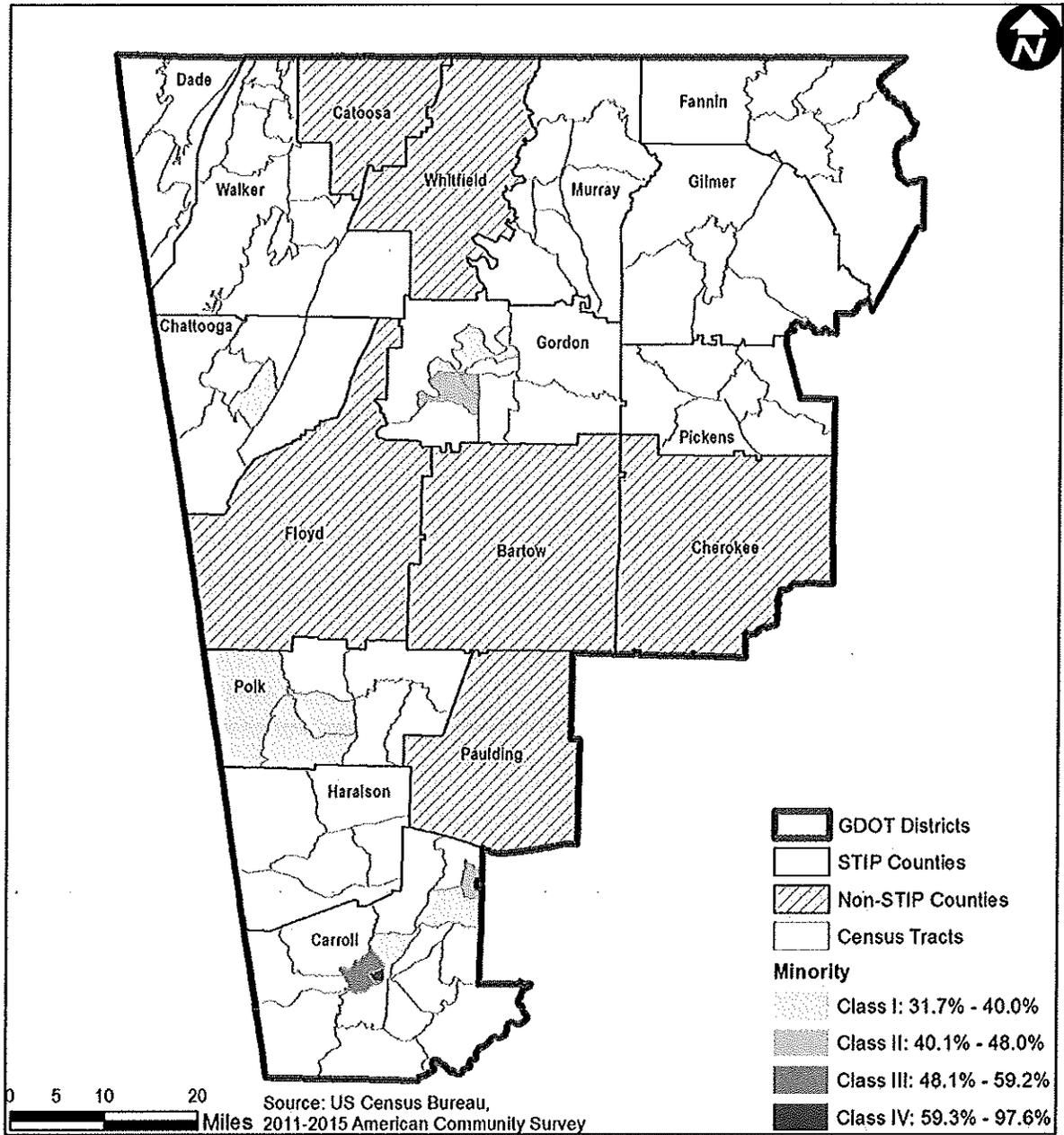
Appendix I

Demographic Maps

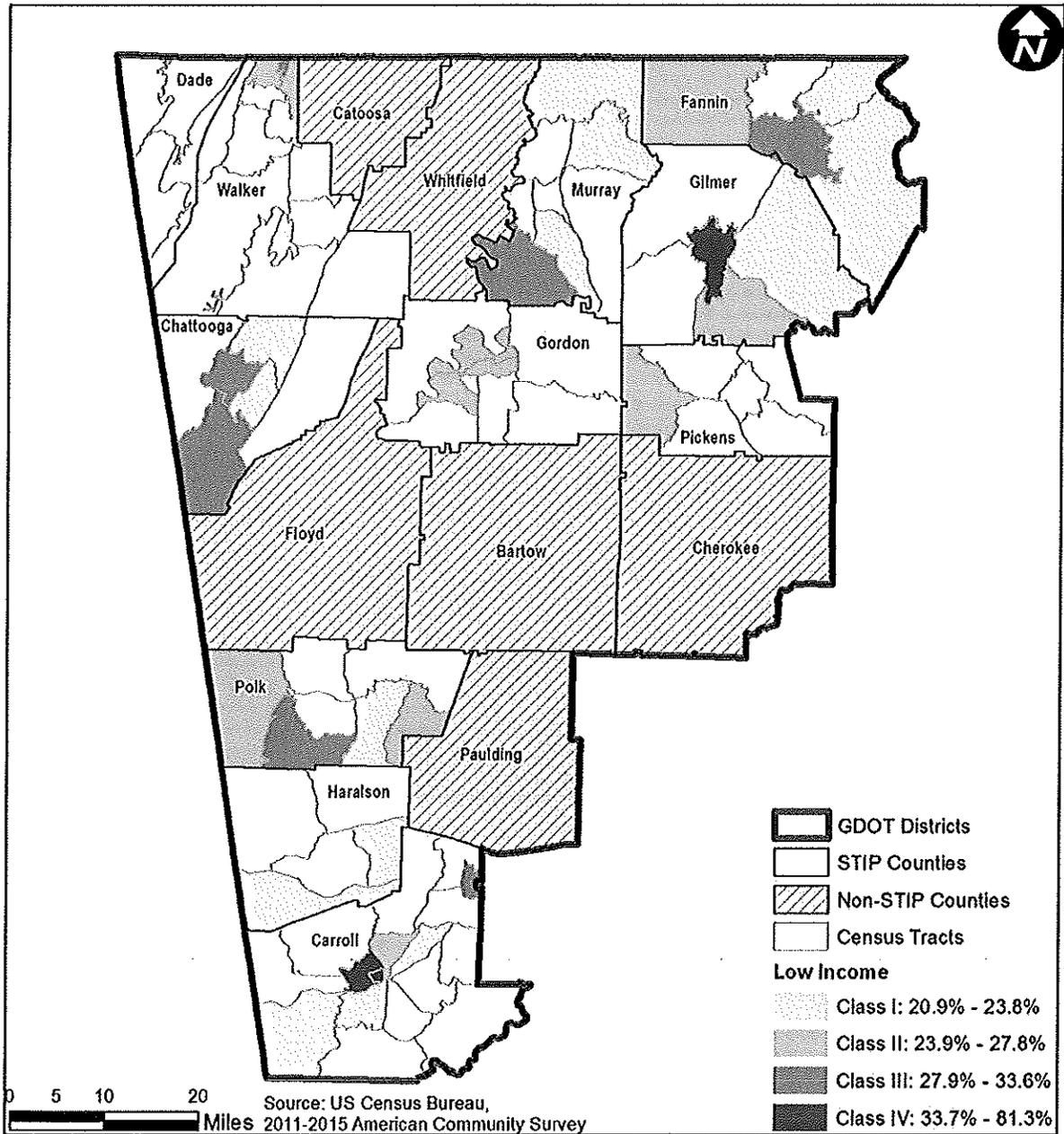
Limited English Proficiency in Region 6:



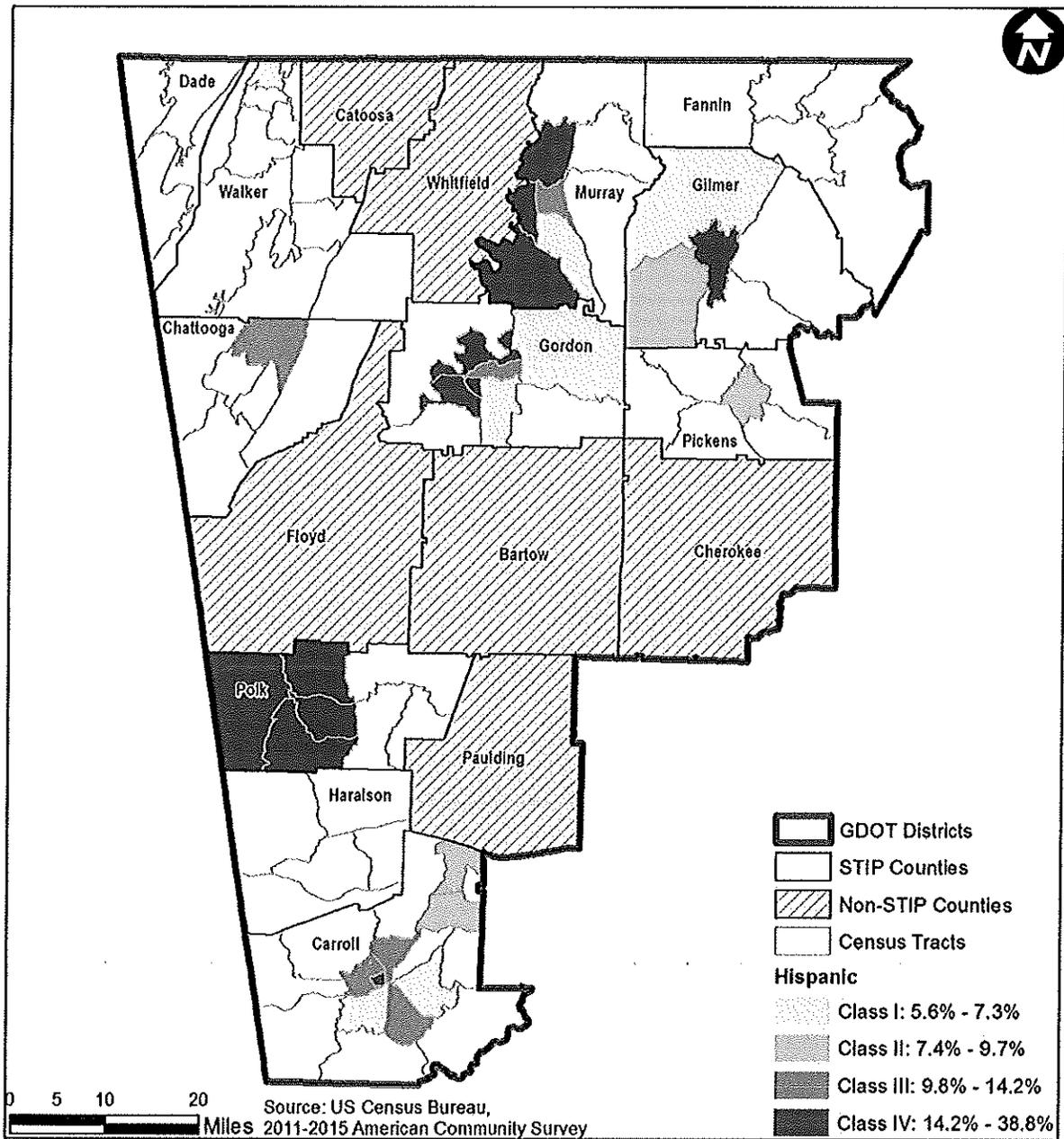
Minority Population in Region 6:



Low-income Population in Region 6:



Hispanic Population in Region 6:



Appendix J

Title VI Equity Analysis

Haralson Transit does not have any transit facility construction, fare increases or changes to current service area planned at this time.