

# Agency Name: BLECKLEY TRANSIT SYSTEM



## Title VI Plan

*Date Adopted: 12/16/2021*



Title VI Plan Activity Log

<b>Date</b>	<b>Activity (Review/Update/Addendum/ Adoption/Distribution)</b>	<b>Concerned Person (Signature)</b>	<b>Remarks</b>

## Table of Contents

<b>1.0</b>	<b>Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan .....</b>	<b>1-1</b>
<b>2.0</b>	<b>Introduction &amp; Description of Services .....</b>	<b>2-1</b>
2.1	First Time Applicant Requirements .....	2-2
2.2	Annual Certifications and Assurances .....	2-3
2.3	Title VI Plan Concurrence and Adoption .....	2-3
<b>3.0</b>	<b>Title VI Notice to the Public .....</b>	<b>3-1</b>
3.1	Notice to Public .....	3-1
3.2	Notice Posting Locations .....	3-1
<b>4.0</b>	<b>Title VI Procedures and Compliance.....</b>	<b>4-2</b>
4.1	Complaint Procedure.....	4-2
4.2	Complaint Form.....	4-2
4.3	Record Retention and Reporting Policy .....	4-3
4.4	Sub-recipient Assistance and Monitoring .....	4-3
4.5	Contractors and Subcontractors .....	4-3
<b>5.0</b>	<b>Title VI Investigations, Complaints, and Lawsuits .....</b>	<b>5-6</b>
<b>6.0</b>	<b>Public Participation Plan.....</b>	<b>6-7</b>
<b>7.0</b>	<b>Language Assistance Plan .....</b>	<b>7-1</b>
<b>8.0</b>	<b>Transit Planning and Advisory Bodies .....</b>	<b>8-2</b>
<b>9.0</b>	<b>Title VI Equity Analysis .....</b>	<b>9-1</b>
<b>10.0</b>	<b>System-Wide Service Standards and Service Policies.....</b>	<b>10-2</b>
<b>11.0</b>	<b>Appendices .....</b>	<b>11-3</b>
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 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: BLECKLEY TRANSIT SYSTEM SERVICE AREA	
APPENDIX I	DEMOGRAPHIC MAPS	
APPENDIX J	TITLE VI EQUITY ANALYSIS	

**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].*

Bleckley Transit System assures the Georgia Department of Transportation that no person shall on the basis of race, color, or national origin 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.

Bleckley Transit System 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 Bleckley Transit System.
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: Mr. Mike Davis, Sole Commissioner, Bleckley County Commission DATE: \_\_\_\_\_  
Executive Director/Signatory Authority, Bleckley Transit System, Date: Month/Day/Year

## 2.0 Introduction & Description of Services

Bleckley 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.

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

### **Title VI Liaison**

Bleckley Transit System Liaison – Ms. Cindy Newman, Finance  
Bleckley County BOC (Sub recipient)  
478-934-3200  
112 N. Second St.  
Cochran, GA 31014

### **Alternate Title VI Contact**

Alternate Title VI Contact – Ms. Carla D. Yawn, Fiscal Tech  
Middle GA CAA, Inc.(TPO)  
478-922-4464 x-1107  
121 Prince St.  
Warner Robins, GA 31093

Bleckley 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 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.

## 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.*


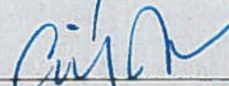

Bleckley Transit System is not a first time applicant for FTA/GDOT funding. The following is a summary of Bleckley Transit System's current and pending federal and state funding.

### Current and Pending FTA Funding

1. Section 5311 Operating, 2021, \$4,561 (March & April, 2021), Pending

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

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
12/10/21	Updated Title VI Policy		
12/10/21	<del>Approved</del> & Presented Approved in a mtg <sup>12/16</sup>		
1/20/22	minutes added to Concurrence letter		

## 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.

Bleckley Transit System will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT and/or FTA.

## 2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on \_\_\_\_\_. The Plan was approved and adopted by Bleckley Transit System's Board of Directors during a meeting held on 12/16/2021. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

*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.*



### 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:

- 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. 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 Bleckley 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 Bleckley Transit System's office(s) including the reception desk and meeting rooms, and on the Bleckley Transit System's website at [bleckley.org](http://bleckley.org). Additionally, Bleckley Transit System will post the notice at stations, stops and on transit vehicles.

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

The public notice must be provided in any other language which meets the Safe Harbor threshold (See Appendix G).

## 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 Bleckley Transit System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Bleckley Transit System investigates complaints received no more than 180 days after the alleged incident. Bleckley Transit System will process complaints that are complete.

Once the complaint is received, Bleckley 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.

Bleckley Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Bleckley 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, Bleckley 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 Bleckley Transit System's website ([www.bleckley.org](http://www.bleckley.org)).

### 4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Bleckley Transit System's website [www.bleckley.org](http://www.bleckley.org).

### 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. Bleckley 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.

### 4.4 Sub-recipient Assistance and Monitoring

Bleckley Transit System has one sub-recipient listed below. Bleckley Community Transit is required by FTA to ensure that the sub-recipient of federal funds comply with all Title VI requirements. To meet this mandate, Bleckley Transit System monitoring consists of collecting data through site visits, day-to-day technical assistance, and reports/forms. Bleckley Transit System uses reports and site visits to determine if the sub-recipient are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan.

Title VI Complaint procedures, Title VI Complaint Form, and a sample Title VI Notice have been developed and distributed by Bleckley Transit System to its sub-recipient. Bleckley Transit System also assists the sub-recipient with demographic maps for Title VI purposes upon request.

Bleckley Transit System Sub-recipient

- Middle Georgia Community Action Agency, Inc.

### 4.5 Sub-recipients and Subcontractors

Bleckley 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. Bleckley 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, Bleckley 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 Bleckley 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 Bleckley agreement with GDOT, Bleckley 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. Bleckley 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 Bleckley County's agreement with GDOT, vendors and contractors of Bleckley 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 Bleckley Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Bleckley 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 Bleckley Transit System.

## 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), Bleckley 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 Bleckley 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.

Bleckley 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
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
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 Bleckley 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 Bleckley 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 Bleckley 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**

Bleckley 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 Bleckley Transit System's recent, current, and planned outreach activities.

- Each year during Grant Application, Bleckley County must place an ad in the County's legal organ to solicit public comment and/or participation in planning/development of the transit system.

## 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).*

Bleckley Transit System operates a transit system within Bleckley County. The Language Assistance Plan (LAP) has been prepared to address Bleckley 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 Bleckley Transit System service area there are approximately 256 residents or 2.0% who describe themselves as not able to communicate in English very well (Source: US Census, 2019 American Community Survey). Bleckley 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. Bleckley 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.*

Bleckley 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.*

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, Bleckley Transit System will ensure the following:

1. Bleckley 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. Bleckley 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, Bleckley 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 Bleckley Transit System determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Bleckley 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. Bleckley Transit System must demonstrate and document how both tests are met. Bleckley 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.

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

## 10.0 System-Wide Service Standards and Service Policies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

Bleckley Transit System is not a fixed route service provider.

## 11.0 Appendices

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# **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**



### Current System Description

1. An overview of the organization including its mission, program goals and objectives.  
Bleckley 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.  
Bleckley Transit System is a non-profit organization. Our organization is made up of 4 full-time employees, 2 part-time administrative employees. We utilize the services of a TPO, who is responsible for all of the day-to-day operations of our organization and reports to our County Clerk, who is in direct contact with our Board of County Commissioners (BCC). Transportation services are provided in accordance with the FTA and DOT requirements. Our transportation system is operated 8 hours per day, Monday through Friday except for holidays and inclement weather.
3. Indicate if Bleckley agency is a government authority.  
Bleckley County operates a non-profit County government under the authority of the State of Georgia.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
Bleckley County BCC is responsible for maintaining current liability insurance and vehicle registration renewal for GDOT and County-owned vehicles. Our TPO is responsible for training and management of our transportation program. All safety-sensitive employees are required to completed GDOT approved safety and security training as part of their new hire orientation. All new employees are also required to complete the on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, wheel chair lift and securement training, defensive driver training, CPR and first aid, drug and alcohol awareness, as well as current driver's license, criminal background, and MVR checks. It is the Dispatcher's and Transit Coordinator'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 all agency vehicles is provided by ASE approved shops or dealerships. All maintenance is performed using the GDOT Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files are kept on-site at our operations site at 242 East Dykes St., Cochran, GA. All driver files are kept at the Transit Coordinator's office at 324 Pine St., Eastman, GA. 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 6 employees that include: 1 Dispatcher, 3 full-time drivers, and 2 part-time administrative staff.

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

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. None of our GDOT vehicles require a CDL license.

8. A detailed description of service routes and ridership numbers

Our service area includes all of Bleckley County. Limited service is provided out of county, usually for available medical service and educational purposes. Appointments and schedules are coordinated to maximize van usage and ridership. Any resident of Bleckley County can request service with our transit system for purposes such as employment, nutrition, social services, shopping, and recreation. Usually we use the shuttle van body style for ease of boarding/de-boarding and stability. Two of our vehicles are equipped with a wheelchair lift.

# **Appendix C**

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

**Bleckley County Commissioner Meeting – Regular Meeting  
December 16, 2021**

Present: Commissioner Mike Davis, Cindy Newman, Staley Bell, Brian Arnold, Kris Coody, Ronnie Smith, Paige Baggs, Carolyn Martin, Jonathan Fordham, Freida Dykes

Commissioner Mike Davis opened and welcomed everyone to the meeting.

All attendees received a copy of the Minutes from the County Commissioner's Meeting on November 18 2021. There were no corrections or additions. Minutes approved.

**Topics discussed in today's meeting**

- A Resolution was presented by County Attorney Brian Arnold regarding moving the final due date for payment of the County Ad Valorem Taxes back to December 20<sup>th</sup>. Commissioner Davis signed the Resolution.
- County Attorney Brian Arnold presented a Resolution abolishing the requirement of the Tax Commissioner's Office to issue mobile home decals. The Ad Valorem Taxes on mobile homes still remain. Commissioner Davis signed the Resolution.
- Commissioner Davis adopted the updated Title VI policy per GDOT requirements.
- Cindy Newman presented the budget with all in attendance. The budget was open for discussion. County Attorney Brian Arnold asked a question regarding the Insurance Premium Tax. Commissioner Davis stated this is a tax the county receives from insurance policies. With no further questions or discussions the 2022 Budget was accepted.
- Robert Hogan presented the Building Report for November 2021. There was a monthly collection of \$ 3,310 and 17 permits issued with the construction cost of \$901,916.
- Commissioner Davis signed a letter re- appointing Mrs. Doris Harris to serve on the Board of Health. Mrs. Harris' term will expire on 12-31-26. The County is currently looking for another member to serve on this board.

**Officials, Directors and Citizen Input**

- Tax Commissioner Paige Baggs stated they had a busy month collecting over 2.7 million in property taxes and \$194,000 in motor vehicle taxes.
- Probate Judge Jonathan Fordham stated court is completed for the year and next year court will be scheduled twice a month. He will also be working on the upcoming election for 2022.
- Sheriff Kris Coody stated the Sheriff's Office had a good year working with other offices and is looking forward to continuing working together in 2022.
- Road Supervisor Ronnie Smith stated Daisy Adams Road and Walker School Road should be paved by the end of the year. The County has also received notice of approval for the Local Maintenance Improvement Grant for the year 2022.
- IDA Director Andy Lucas shared information with all present. He stated Havenwood Apartments will open the end of February and appointments will be scheduled for those who apply. The BCHS Youth Leadership group from the high school visited Robins Air Force Base to view aspects of the Electronic Engineering Program. He stated the last 60 days the IDA contracted with Ky

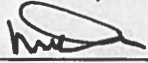
Dykes and David Shepard to mulch and clear up 60 acres of the 272 acres the IDA owns on Jac-Arts Road. He also commended Ronnie Smith and his road crew for the work they assisted in on the front three acres of the land. The IDA is still working with EMC on the removal of old poles on the property. The last IDA meeting of 2021 will be Tuesday December 21<sup>st</sup> and will have a busy 2022 working to get closer to having some needed utilities on the property, and solicit employers to consider our community for expansion. IDA Director Andy Lucas closed by wishing all a safe holiday.

- Commissioner Davis introduced Staley Bell, Director of the Chamber of Commerce to all present. She stated she is reworking the Chamber of Commerce Facebook page, adding a new Instagram page and is working on the Bleckley Buzz newsletter. She shared some events that are scheduled. The DDA and Chamber of Commerce scheduled a local band to play in the auditorium on January 15<sup>th</sup>. All profits from the sale of tickets will go toward the city auditorium for improvements. The Chamber of Commerce Annual Banquet is scheduled for February 4<sup>th</sup>.

Citizen Input: None

With no further comments or questions, the meeting was adjourned.

Approved on: 1/20/22

Approved by: 

Mike Davis  
Bleckley County Commissioner



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

December 28, 2021

Cindy Newman  
112 North Second Street  
Cochran, GA 31014

Dear Ms. Newman,

The Georgia Department of Transportation (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 Jihyun Park, Transit Compliance and Asset Manager at [jpark@dot.ga.gov](mailto:jpark@dot.ga.gov) or (404)-631-1235.

Sincerely,

**Patricia  
Smith**

Patricia Smith  
Transit Program Manager  
Division of Intermodal

Digitally signed by  
Patricia Smith  
Date: 2022.01.07  
18:00:45 -05'00'

Insert a copy of the Title VI Plan adoption meeting minutes and the GDOT concurrence letter.

# **Appendix D**

## **Title VI Notice to Public**



**Notifying the Public of Rights Under Title VI****Bleckley Transit System**

- Bleckley 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 Bleckley Transit System.
- For more information on Bleckley Transit System's civil rights program, and the procedures to file a complaint, contact 478-934-3835, (TTY XXX-XXX-XXXX); email [bleckleytransit@mgcaa.org](mailto:bleckleytransit@mgcaa.org); or visit our administrative office at 111 Beech St., Suite 3, Cochran, GA 31014. For more information, visit [www.bleckley.org](http://www.bleckley.org).
- If information is needed in another language, contact 478-934-3835.
- You may also file Bleckley 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**

# Bleckley Transit System

## Title VI Complaint Form

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on Bleckley 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"/> 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

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes  No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Agency \_\_\_\_\_

State Court \_\_\_\_\_

Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

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 Bleckley complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

Bleckley Transit System Title VI Liaison  
 Ms. Chasity Basley  
 Bleckley Transit System  
 111 Beech St., Suite 3  
 Cochran, GA 31014

# **Appendix F**

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

## Introduction

The Public Participation Plan (PPP) for Bleckley 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 Bleckley 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 Bleckley 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. Bleckley Transit System also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, 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 Bleckley Transit System and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Bleckley Transit System will proactively reach out and engage low-income, minority, and LEP populations for the Bleckley 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:** Bleckley 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 Bleckley Transit System. Bleckley Transit System intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Bleckley 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 Bleckley Transit System website [www.Bleckley.org](http://www.Bleckley.org) and all feedback on the site will be recorded and passed on to Bleckley Transit System management. The public will also be able to call the Bleckley Transit System office at 478-934-3835 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Bleckley Transit System 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.

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, Bleckley 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
- Flyers and information distribution through various libraries, doctor's offices, grocery stores, restaurants, banks, apartments, utilities, day care, post office, churches, and other local establishments
- We want to access public service announcements on TV, radio, and other public media
- Ensure practices are in place to allow issues and concerns of low-income and minority populations are appropriately considered
- Track evidence of issues and concerns raised by minority, LEP, and low-income populations

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

Bleckley Transit System has not initiated significant changes in number of vehicles, scope of service, transit policies, personnel, or fare structure. Therefore, the agency has not been required to perform public hearings.



# **Appendix G**

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

## I. Introduction

Bleckley Transit System operates a transit system within Bleckley County. The Language Assistance Plan (LAP) has been prepared to address Bleckley 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 Bleckley Transit System service area there are 256 residents or 2.0% who describe themselves as not able to communicate in English "very well" (Source: US Census, 2019 American Community Survey). Bleckley 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. Bleckley 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 Bleckley Transit System be able to communicate effectively with all of its riders. When Bleckley 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. Bleckley 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 Bleckley 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 Bleckley 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 Bleckley 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 Bleckley Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Bleckley Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Bleckley Transit System to the LEP population.
4. The resources available to Bleckley 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 12,807 residents in the Bleckley Transit System service area 256 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Bleckley Transit System services. For the Bleckley Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 98% speak English “very well”. For groups who speak English “less than very well”, 2.0% speak Spanish and .01% speak Tagalog.

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

b. **Factor 2: The Frequency with which LEP Individuals Come into Contact with Bleckley 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.

Bleckley 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 Spanish speaking population would present

the largest possibility of encountering LEP, but no encounters have been reported. Phone inquiries and staff survey feedback indicated that Bleckley 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 3 years, Bleckley 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 in Bleckley County has a strong presence. As previously stated, patrons requested transportation to employment, education, nutrition, social services, shopping, medical, and recreation. Bleckley Transit System averages approximately 825 passenger trips per month.

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

To further access personal mobility options, each respondent was asked how he or she would have made the surveyed trip had Bleckley Transit System not been available. The most frequent response was "friend of family member" (40 percent). An additional 25 percent indicated they would not have made the surveyed trip if the service was not available. This data indicates that the Bleckley Transit System Service is very important as a primary means of transportation for its customers.

d. **Factor 4: The Resources Available to the Recipient and Costs**

Bleckley County will continue to use word processing translation and local contact people to provide LEP persons access to County programs and materials. Also, telephone interpreters are available for approximately \$3.00 to \$5.00 per minutes. Electronic verbal and written interpreters are available for approximately \$200 to \$500 each.

### **III. 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.

Bleckley Transit System has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 98% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (2.0%). Of those whose primary spoken language is Spanish, approximately 2.0% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 0.1% of the service area population.

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

1. Having Census Bureau Language Identification Flashcards available at Bleckley Transit System Meetings. This will assist Bleckley Transit System in identifying language assistance needs for future events and meetings.
2. 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 Bleckley Transit System management to follow-up.
3. 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.

Bleckley Transit System has undertaken the following actions to improve access to information and services for LEP individuals:

1. Consult with transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
2. Provide Language Identification Flashcards onboard transit vehicles and in the Bleckley Transit System offices.
3. Include statements clarifying that being bilingual is encouraged on bus driver recruitment materials.
4. 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.

Bleckley 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; and, (3) providing regular re-training for staff dealing with LEP individual needs.

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities as established in this plan.
2. Use of Language Identification Flashcards.
3. Documentation of language assistance requests: We have not received any requests for language assistance.
4. How to handle a potential Title VI/LEP complaint:  
Section 4.1 of this Title VI Plan provides specific instructions for evaluation of a complaint, and specific guidelines and time frames that specific actions must be taken.

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

Bleckley 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 Bleckley Transit System office lobby, on buses, and on County office lobby. 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 Bleckley Transit System's financial resources are sufficient to fund language assistance resources needed

Bleckley 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. Bleckley Transit System is open to suggestions from all sources, including customers, Bleckley 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.

#### **IV. 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.

Bleckley Transit System service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Bleckley Transit System does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person.

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. Bleckley 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:**

**Bleckley Transit System Service Area**



Language	County	Percent of Population
Total	12807	
Speak only English	11808	98
Spanish or Spanish Creole	245	2
Speak English "very well"	165	1
Speak English less than "very well"	80	1
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"		

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		

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	10	.1
Speak English "very well"		
Speak English less than "very well"	10	.1
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**







**Appendix J**  
**Title VI Equity Analysis**



**Bleckley Transit System has not constructed any facilities. Therefore, a Title VI Equity Analysis is not required.**