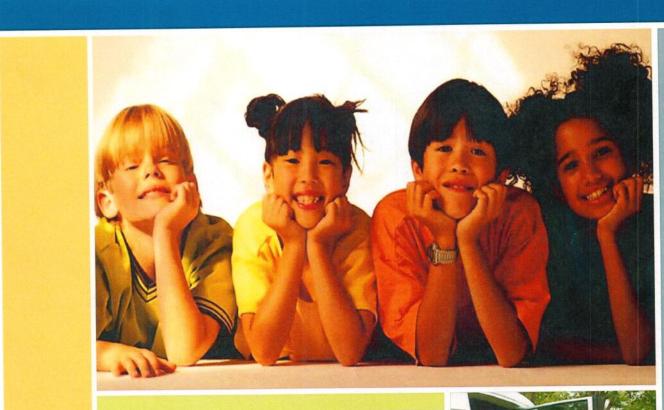
HEARD COUNTY TRANSIT



Title VI Plan

Date Adopted: January/27/2015



Preface

This template has been developed by the Heard County transit System in order to assist with the development of the Title VI Plan and 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. 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 including but not limited to minimum requirements of Section 49 Code of Federal Regulations, Part 21 and Federal Transit Administration (FTA) Circular 4702.1B.

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
1/27/2015	Adoption of Title VI		

Title VI Plan Activity Log (Continued)

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

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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].

Heard County 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.

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

- Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
- Issue a policy statement signed by the Executive Director or authorized representative, which expresses
 its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated
 throughout the Recipient's organization and to the general public. Such information shall be published
 where appropriate in language other than English.
- 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 Heard County Transit.
- 5. Participate in training offered on the Title VI and other nondiscrimination requirements.
- If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
- 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: Kee Goone

Printed Name: Lee Boone - Commission Chairman, Heard County Date: April 24, 2015

2.0 Introduction & Description of Services

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

Heard 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.

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

Title VI Liaison

Samantha McKinney – Heard County Transit Director Heard County Board of Commissioners Phone Number 706-675-1410 470 Old Field Rd. Franklin, Ga. 30217

Alternate Title VI Contact

Patty Jiles-Heard County Human Resources Director Heard County Board of Commissioners Phone Number 706-675-3821 215 E Court Square Franklin, Ga. 30217

Heard 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:

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

2.1 First Time Applicant Requirements

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

Current and Pending FTA Funding

1. 5311 2014 Operations \$75,884.18 Capital \$71,451.20, Current

Current and Pending GDOT Funding

1. 5311 2014 \$8,931.40

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

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.

Heard County Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT and any other primary recipient.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on . The Plan was approved and adopted by Heard County Board of Commissioners during a meeting held on 02/27/2015. 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 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.

3.1 Notice to Public

Heard County Transit operates programs without regard to race, color, disability, and national origin. A description of the procedures members of the public should follow or to request additional information on the grantee's nondiscrimination obligations can be found on the FTA Circular 4702.1B, Chapter 3, website — http://www.fla.dot.gov/documents/fta-title_VI-final.pdf. You can also go to google.com and type in the words Title VI and it will give you various options. In the case that a member of the public should wish to file a discrimination complaint against the grantee, the above sites could also be used. A member should contact first his/her transportation provider or your state and /or local government.

3.2 Notice Posting Locations

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

4.0 Title VI Procedures and Compliance

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

Once the complaint is received, Heard 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.

Heard County Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Heard County 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, Heard County 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 Heard County's Government website at www.heardcountyga.com under the Transit Department.

4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E and on Heard County's Government website at www.heardcountyga.com under the Transit Department.

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. Heard County 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

Heard County Transit does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Heard County 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.]

4.5 Sub recipients and Subcontractors

Heard County Transit 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. Heard County Transit and/or its subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors 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:

- 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, Heard County Transit shall impose contract sanctions as appropriate, including, but not limited to:
 - 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 Heard County Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

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

E-Verify

As a condition of your agreement with GDOT, vendors and contractors of Heard County Transit 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 Heard County Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Heard County Transit 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 Heard County Transit.

5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Heard County 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 Heard County 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.

Heard County 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				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6.0 Public Participation Plan

The Public Participation Plan (PPP) for Heard 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 Heard 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 Heard 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. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Heard County 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 Heard County Transit's recent, current, and planned outreached activities.

- [Activity 1] Planned Public Meeting at Heard County Public Library for 8/12/2015
- [Activity 2] Planned Public Meeting at Heard County Public Library for 11/19/2015

7.0 Language Assistance Plan

Heard County Transit operates a transit system within Heard County with travel to Carroll, Coweta, and Troup County. The Language Assistance Plan (LAP) has been prepared to address Heard 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 Heard County Transit's service area there are 10,972 residents or 0.08% who describe themselves as not able to communicate in English very well (Source: US Census). Heard 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. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

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

9.0 Title VI Equity Analysis

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

- Heard County Transit 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. Heard County Transit will engage in outreach to persons potentially impacted by the sitting of the facility. The Title VI equity analysis must compare the equity impacts of various sitting alternatives, and the analysis must occur before the selection of the preferred site.
- When evaluating locations of facilities, Heard County Transit 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 Heard County Transit determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Heard County Transit 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. Heard County Transit must demonstrate and document how both tests are met. Heard County Transit 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.

Heard County Transit has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Your Transit System does not have any Title VI Equity Analysis reports to submit with this Plan. Your 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

Heard County Transit is not a fixed route service provider.

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators.

a. Vehicle

GDOT Fleet							
Number	VIN	TYPE	YEAR	MAKE	SEATS	LIFT	TAG
3221	1FDEE3F54CDA82521	Shuttle Van	2012	Elkhart	12	No	GV2133C
3222	1FDEE3FS3CDA50806	Shuttle Van	2012	Elkhart	10	Yes	GV2132C

b. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than fifteen (15) minutes early and no more than ten (10) minutes late. The Heard County Transit on-time performance objective is 90% or greater. Heard County Transit continuously monitors on-time performance.

c. Service Availability

Heard County Transit will distribute transit service so that 100% of all residents in the service area have the opportunity to obtain ridership if at all possible. Provided the time, place and date of the appointment coincides with availability.

10.2 Service Policies

Heard County Transit will comply fully with all administrative and other requirements established by applicable federal and state laws, rules and regulations, and assumes responsibility for full compliance with all such laws, rules and regulations. It is further understood and agreed that Heard County Transit is a "covered entity" as defined by HIPPA of 1996 and the federal "Standards for Privacy of Individually Health Information" promulgated there under at 45 CFR parts 160 and 164. Heard County Transit will comply with O.C.G.A. sec. 13-10-90 et seq. regarding security and immigration compliance. Heard County Transit agrees to comply with federal and state laws, rules and regulations relative to nondiscrimination in consumer/customer/client service practices on the basis of political affiliation,

Title VI Plan

religion, race, color, sex, handicap, age, creed, veteran status, and/or national origin. Heard County Transit agrees to comply with all applicable provisions of the American with Disabilities Act (ADA) and any relevant federal and state laws, rules and regulations regarding practices toward individuals with disabilities and the availability of programs, activities, or service for the public with disabilities.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GOOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: HEARD 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
	A copy of board meeting minutes, resolution, of other appropriate documentation of the policy
	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

An overview of the organization including its mission, program goals and objectives.
 Heard County Transit'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, safety and security plan.

Heard County Transit is unit of local government organization. Our organization is made up of 2 full-time employees, and 2 part-time employees. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the approved Safety and Security Plan. We will continue to operate at previous year (2013) service hours averaging 18 total fleet service hours per day or approximately 5,400 annual service hours (assuming 300 operating days).

3. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

Heard County Transit's Director is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Transit Director is responsible for annual renewal of all liability insurance for GDOT. 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.

4. Who provides vehicle maintenance and record keeping? Maintenance on all agency vehicles is provided by Heard County Vehicle Maintenance. 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 470 Old Field Road Franklin, Ga. 30217 and are maintained by the Transit Director. All records are maintained and retained for a minimum of four (4) years. 5. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to the public. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Our fleet includes two buses one of which is equipped for wheelchair services. We prioritize grouping trips and multi-loading to the maximum extent possible. We make approximately 620 passenger trips per month and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

HEARD COUNTY BOARD OF COMMISSIONERS MEETING JANUARY 27, 2015 – 6:30 P.M.

The Heard County Board of Commissioners held a Commissioners Meeting on January 27, 2015 at 6:30 p.m. in the courtroom of the Heard County Courthouse.

In attendance at the meeting were Chairman Lee Boone, District 1 Commissioner Larry Hooks, District 2 Commissioner Keri Denney, District 3 Commissioner Gwen Caldwell, District 4 Commissioner Larry Hammond, District 5 Commissioner Joe Adams, and County Attorney Jerry Ann Conner. Chairman Boone called the meeting to order and welcomed everyone present. Chairman Boone gave the invocation and then extended a special welcome to the three new commissioners.

Agenda Item #3 – Presentation of Proclamation For Georgia Day – Mrs. Carla Brown asked the Board to proclaim February 12, 2015 as Georgia Day in honor of our State's 282nd anniversary. Chairman Boone read the proclamation into the minutes. On motion (Caldwell) and second (Hammond), the Board unanimously approved the proclamation.

Agenda Item # 4 – Approval of Minutes – On motion (Caldwell) and second (Hammond), the Board voted unanimously to approve the minutes from December 18, 2014 as presented.

Agenda Item # 5 – Amend Agenda – None.

Agenda Item # 6 – New Business – a. Appoint Vice-Chairman for 2015 – On motion (Hooks) and second (Denney), the Board unanimously voted to appoint Commissioner Caldwell as Vice-Chairman for 2015.

b. Appoint County Clerk for 2015 – Chairman Boone recommended appointing Patty Jiles as County Clerk for 2015. On motion (Adams) and second (Caldwell), the Board unanimously approved this recommendation.

- c. Appoint County Attorney for 2015 Chairman Boone recommended appointing Jerry Ann Conner as County Attorney for 2015. On motion (Denney) and second (Hooks), the Board unanimously approved this recommendation.
- **d. Appoint County Auditor for 2015 -** Chairman Boone recommended appointing Mr. Kim Kimmel as County Auditor for 2015. Chairman Boone stated that Mrs. Felicia Adams, Finance Director recently spoke with Mr. Kimmel who did ask for a \$1,500.00 increase in his fees from last year for a total rate of \$22,500.00. On motion (Hammond) and second (Caldwell), the Board unanimously approved this recommendation.
- e. Set Meeting, Date, Time and Place for 2015 Commissioners Meetings On motion (Adams) and second (Denney), the Board unanimously voted for the commissioner meetings to change to the fourth Tuesday of each month at 6:30 p.m. in the courtroom of the Heard County Courthouse for 2015.
- f. Discuss Appointment to Heard County Planning Commission Chairman Boone stated there is an open position on the Planning Commission. Mr. Danny Smith term will expire on January 31, 2015 and he no longer lives in Heard County and therefore is not eligible to be reappointed to this Board. Commissioner Hooks asked if this could be postponed until the next meeting to allow him more time to speak with another Heard County resident about taking this position. All agreed.
- g. Approve Title VI Plan for Heard County Transit Chairman Boone explained that Heard County must have a Title VI Plan approved in order for Heard County Transit to continue to receive their federal and state funding. County Attorney, Jerry Ann Conner stated she had reviewed the plan and it was in order. On motion (Denney) and second (Hooks), the Board unanimously approved this recommendation.

h. Discuss Road Projects – Darold Wiggins, Public Works Director – Public Works

Director, Darold Wiggins made a presentation to the Board to discuss the process he uses to

determine which corrective action is to be taken on what road at the correct time. He presented

detailed data showing an increase in road department productivity while at the same time

showing a decrease in expenditures. Chairman Boone stated that he and Mr. Wiggins have

discussed this process and how it works and he feels as if the process allows the road

department to be much more productive now. Mr. Wiggins clarified for Commissioner Adams
that there is more work to be done on Victory Road. Commissioner Denney asked Mr. Wiggins
for a list of roads that will be worked on in 2015.

i. Request from Terri Thomaston, Knight Road – Mrs. Terri Thomaston a resident on Knight Road addressed the Board regarding a text amendment to the Zoning ordinance to allow her to build a ¼ mile go cart tract on 3 acres on Knight Road. She explained that this track would support 5 hp go carts only. After much discussion, on motion (Adams) and second (Hooks), the Board unanimously voted to refer this request to the Planning Commission.

Agenda Item #7 - Old Business - None.

Agenda Item #8 – Public Comments – Mr. Mac Walter, resident at 147 Abner Road asked the Board if the road department could look at re-directing rain water away from his house. Public Works Director, Darold Wiggins stated he would look into this for Mr. Walter. Mr. Gerald Harjo, resident at 933 Mahaley Road reported that a drain is stopped up at Mahaley Road at the church. Mr. Wiggins stated he did look at that issue already and the road department was preparing to repair this problem.

Agenda Item #8 - Executive Session - None.

There being no further business, on motion (Caldwell) and second (Hooks), the Board unanimously voted to adjourn.

Appendix D Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Heard County Transit

- Heard County Transit operates its programs and services without regard to race, color, and
 national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she
 or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a
 complaint with Heard County Transit.
- For more information on Heard County Transit's civil rights program, and the procedures to file a complaint, contact 706-675-1410, or send an email to transit@heardcountyga.com. You may also send a letter to Heard County Transit at 470 Old Field Rd Franklin, Ga. 30217.
- If information is needed in another language, contact 706-675-1410
- 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

HEARD COUNTY TRANSIT

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Work)	:	
Electronic Mail Addr	ess:			
Accessible Format	Large Print		Audio Tape	
Requirements?	TDD		Other	
Section II:				
Are you filing this co	mplaint on your own behalf?		Yes*	No
*If you answered "ye	es" to this question, go to Section III.			
If not, please supply you are complaining	the name and relationship of the perso	on for whom		
, , ,				
Dlooso ovalaja why v	ou have filed for a third party:	•		
Please explain why y	you have filed for a third party:			
Please explain why y	ou have filed for a third party:			
	you have filed for a third party: you have obtained the permission of th	ne aggrieved	Yes	No
Please confirm that		ne aggrieved	Yes	No
Please confirm that	you have obtained the permission of th	ne aggrieved	Yes	No
Please confirm that party if you are filing	you have obtained the permission of th		Yes	No
Please confirm that party if you are filing	you have obtained the permission of thg on behalf of a third party.		Yes	
Please confirm that party if you are filing Section III: I believe the discrim	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (ch	eck all that apply): [] National Origin	[]	
Please confirm that party if you are filing Section III: I believe the discrim [] Race [] Disability	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (cheese and continued in the continue	eck all that apply): [] National Origin [] Other (explain) _	[]	
Please confirm that party if you are filing Section III: I believe the discrim [] Race [] Disability Date of Alleged Disc	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (chee) [] Color [] Family or Religious Status erimination (Month, Day, Year):	eck all that apply): [] National Origin [] Other (explain) _	[]A	Age
Please confirm that party if you are filing Section III: I believe the discrim [] Race [] Disability Date of Alleged Disc Explain as clearly as	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (chee) [] Color [] Family or Religious Status crimination (Month, Day, Year):	eck all that apply): [] National Origin [] Other (explain) _ believe you were discri	[] A	age t. Describe all
Please confirm that y party if you are filing Section III: I believe the discrim [] Race [] Disability Date of Alleged Disc Explain as clearly as persons who were in	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (chee [] Color [] Family or Religious Status erimination (Month, Day, Year):	eck all that apply): [] National Origin [] Other (explain) _ believe you were discrint information of the per	[] A minated agains son(s) who disc	t. Describe all
Please confirm that y party if you are filing Section III: I believe the discrim [] Race [] Disability Date of Alleged Disc Explain as clearly as persons who were in	you have obtained the permission of the gon behalf of a third party. ination I experienced was based on (chee) [] Color [] Family or Religious Status crimination (Month, Day, Year):	eck all that apply): [] National Origin [] Other (explain) _ believe you were discrint information of the per	[] A minated agains son(s) who disc	t. Describe all

		-				
			/ 8		_	_
	- 7 ^			_	-	-
Tit	-		_			

Have you previously filed a Title VI complaint with this agen	cy?	Yes	No
Section V			
Have you filed this complaint with any other Federal, State,	or local agency, or wit	h any Federal	or State cour
[] 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 ag	ency/court where the	complaint wa	s filed.
Name:	66 06ts	V-5	
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 informations of the signature and date required below	tion that you think i	s relevant to	your compla
Signature	Da	ate	
Please submit this form in person at the address below	, or mail this form to	o:	
Heard County Transit Samantha McKinney			

Your Transit System E-2

470 Old Field Road Franklin, Ga. 30217

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Heard 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 Heard 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 Heard 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. Heard County Transit 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 Heard County Transit and its operations. The goals for this PPP include:

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

Heard County Transit 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 to Heard County Transit by sending an email to heardcountyga.com. The public will also be able to call the Heard County Transit office at 706-675-1410 during its hours of operation. Feedback collected over the phone will be recorded and passed on to the Heard County Transit Director. 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, Heard County transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials

Other methods required by local or state laws or agreements

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

Public Hearing

Heard County Transit is not required to perform public hearings, however Heard County Transit provides public information regarding changes, events, performances, activities, and/or any other federal or state regulated dicission, and the public can request a public hearing.

No public hearings have been requested at this time.

LCB Meetings

Heard County transit operates under Heard County Board of Commissioners and they conduct monthly board meetings to discuss policies, RFP's, contracts, ect...

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Heard County Transit operates a transit system within Heard County Georgia. The Language Assistance Plan (LAP) has been prepared to address Heard 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 Heard County Transit service area there are 10,972 residents and 0.08% who describe themselves as <u>not</u> able to communicate in English "very well". Heard 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. Heard 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 Heard County Transit be able to communicate effectively with all of its riders. When Heard 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. Heard 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 Heard 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:

- 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 Heard County Transit staff to assist LEP customers

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Heard County Transit 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 Heard County Transit program, activity or service.
- 2. The frequency with which LEP persons come in contact with Heard County Transit programs, activities or services.
- 3. The nature and importance of programs, activities or services provided by Heard County Transit to the LEP population.
- 4. The resources available to Heard County Transit and overall costs to provide LEP assistance

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

Of the 10,972 residents in the Heard County Transit service area 0.08 % of residents describe themselves as speaking English less than "very well". People of French descent are the primary LEP persons likely to utilize Heard County Transit services. For the Heard County Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 99.92% speak English "very well". For groups who speak English "less than very well", 0.07% speak French and 0.01% speak Tagalog.

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

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.

Heard County transit 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. Phone inquiries and staff survey feedback indicate that Heard County Transit dispatchers and drivers interact infrequently with LEP persons.

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 Responsibilites to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board passenger survey was conducted to collect data on usage of and access to the Your Transit System services.

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
- 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.

Heard County Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 99.92% of the service area population speaks English only. The largest non-English spoken language in the service area is French (0.07%).

Heard County Transit may identify language assistance need for an LEP group by:

 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.

- Having Census Bureau Language Identification Flashcards available at Heard County Transit Meetings. This will assist Heard county Transit in identifying language assistance needs for future events and meetings.
- 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 Heard County Transit Director to follow-up.
- 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.

Heard County transit has undertaken the following actions to improve access to information and services for LEP individuals:

- 1. Survey 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 Sheet onboard transit vehicles and in the Heard County Transit offices.
- 3. 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.

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 Heard County Transit, 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

Heard County Transit will make Title VI information available in English on the Agency's website. Key documents are written in English. Notices are also posted in Heard County Transit office and on buses. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

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

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

Heard County Transit 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. Heard County Transit is open to suggestions from all sources, including customers, Heard County Transit 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.

Heard County Transit service area does not have LEP populations which qualify for the Safe Harbor Provision.

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. Heard County Transit 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: Heard County Transit Service Area

Language	<u>Estimate</u>	学生学生
Total	10,972	
Speak only English	10,925	
Spanish or Spanish Creole	19	
Speak English "very well"	<mark>19</mark>	
Speak English less than "very well"	0	
French (incl. Patois, Cajun)	<mark>7</mark>	
Speak English "very well"	0	
Speak English less than "very well"	<mark>7</mark>	
French Creole	0	
Speak English "very well"	0	
Speak English less than "very well"	O	
Italian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Portuguese or Portuguese Creole	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
German	<mark>2</mark>	
Speak English "very well"	2	
Speak English less than "very well"	0	
Yiddish	0	
Speak English "very well"	<mark>О</mark>	
Speak English less than "very well"	0	
Other West Germanic languages	<mark>0</mark>	
Speak English "very well"	0	
Speak English less than "very well"	0	
Scandinavian languages	0	
Speak English "very well"	0	

Language	Estimate	
Speak English less than "very well"	0	•
Greek	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Russian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Polish	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Serbo-Croatian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Slavic Languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Armenian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Persian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Gujarati	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hindi	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Urdu	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Indic languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Indo-European Languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Chinese	0	
Speak English "very well"	0	7
Speak English less than "very well"	0	
Japanese	2	

Language	<u>Estimate</u>	
Speak English "very well"	2	
Speak English less than "very well"	0	
Korean	0	
Speak English "very well"	0	
Speak English less than "very well"	<mark>0</mark>	
Mon-Khmer, Cambodian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hmong	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Thai	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Laotian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Vietnamese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Asian languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Tagalog	17	
Speak English "very well"	<mark>15</mark>	
Speak English less than "very well"	2	
Other Pacific Island languages	0	
Speak English "very well"	0	
Speak English less than "very well"	<mark>0</mark>	
Navajo	0	
Speak English "very well"	<u>0</u>	
Speak English less than "very well"	0	
Other Native American languages	<mark>0</mark>	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hungarian	0	
Speak English "very well"	<u>0</u>	
Speak English less than "very well"	<mark>0</mark>	
Arabic	<mark>0</mark>	
Speak English "very well"	0	
Speak English less than "very well"	0	

Title VI Plan

<u>Language</u>	<u>Estimate</u>	
Hebrew	O	
Speak English "very well"	0	
Speak English less than "very well"	0	
African languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other and unspecified languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	

E # 1 1

Appendix I Demographic Maps



Figure 20: District 3

5.3.1 Minority EJ Population

Figure 21 is a map of the minority EJ population located in District 3. Within District 3, 62 percent of the tracts have a minority population above the minority EJ threshold. The analysis shows 20 Class IV tracts located in the following counties: Spalding, Troup, Talbot, Stewart, Marion, Sumter, Macon and Peach. The analysis also shows 21 Class III tracts, 16 Class II tracts and 11 Class I tracts. Tract locations can be found in Figure 21.

5.3.3 Low-income EJ Population

Figure 23 is a map of the low-income EJ population located in District 3. Within District 3, 50 percent of the tracts have a low-income population above the low-income EJ threshold. The analysis shows 14 Class IV tracts located in the following counties: Spalding, Upson, Crawford, Taylor, Peach, Dooly and Sumter. The analysis also shows 17 Class III tracts, 10 Class II tracts and 13 Class I tracts. Tract locations can be found in Figure 23.

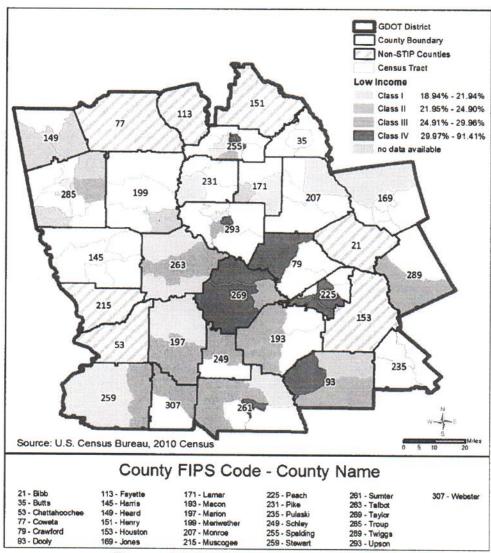


Figure 23: District 3 Low-income EJ Population

Figure 25 is a map of the LEP EJ population located in District 3. Within District 3, 21 percent of the tracts have a LEP population above the LEP EJ threshold. The analysis shows only 1 Class IV tract located in Peach County. The analysis also shows eight Class III tracts, seven Class II tracts and seven Class I tracts. Tract locations can be found in Figure 25.

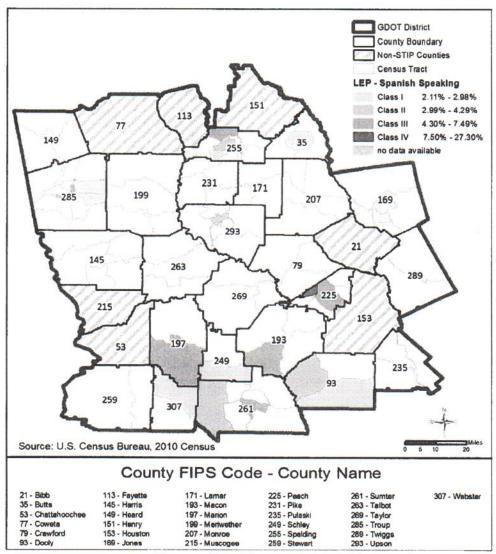


Figure 25: District 3 LEP EJ Population

Appendix J Title VI Equity Analysis

Heard County transit has not preformed Title VI Equity Analysis.

Appendix K Text Formatting Palette

Formatting/Styles

Report margins:

Top margin = 1"

Bottom margin = 1"

Left margin = 1.25"

Right margin = .75"

Heading levels:

Heading One

Calibri 14 pt bold; left-aligned; paragraph spacing = 10 pt after; line spacing multiple 1.15

Heading 2

Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

Body Text: Calibri 11; fully-justified text; line spacing-multiple 1.15; 10 pt. after.

Bulleted List: Calibri 10 pt; line spacing-multiple 1.15; paragraph spacing = 10 pt after

General Instructions

How to Update Table of Contents:

Right click on table of contents and choose *update field*—you will then have the option of updating the entire table of contents or just the page numbers.

How to Add New Section:

Under *Page Layout Menu*, choose *Breaks*, then *Section Break*, then *Next Page*. Heading numbers should update automatically in new section.