

Hancock Transit System



Title VI Plan



Date Adopted: December/19/2018

Preface

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

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

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

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

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

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



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

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



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

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

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

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

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
December 2018	Adopted for 2019-2021 updates		
August 15, 2019	GDOT Concurrence Letter	Michele Nystrom	Ready for adoption

**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].

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

Hancock 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 Hancock 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: Helen G. Hudson

Executive Director/Signatory Authority, Hancock Transit System, Date: Month/Day/Year

2.0 Introduction & Description of Services

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

Hancock 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.

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

Title VI Liaison

Helen "Sistie" Hudson/Chairman
Hancock County Board of Commissioners
706-444-5746
12630 Broad Street, Sparta, Ga. 31087

Alternate Title VI Contact

Knakia Huff/Hancock County Transit Director
Hancock County Board of Commissioners
706-444-5746
12630 Broad Street, Sparta, Ga. 31087

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

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

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.

2.1 First Time Applicant Requirements

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

Current and Pending FTA Funding

1. [FTA-5311 Operating], [7/1/18-6/30/19], [49,623.00],[Current]
2. [FTA-5311 Capital], [7/1/18-6/30/19], [39,418.00],[Current]

Current and Pending Federal Funding (non-FTA)

1. [CSRA-DHS], [7/1/18-6/30/19], [10,166.00], [Current]

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.

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

The following is a summary of the compliance review.

- a. Date of the compliance review
March 26, 2018
- b. The purpose or reason for the review
To insure we are following policies and procedures
- c. Agency or organization that performed the review
GDOT
- d. Summary of the finding and recommendations of the review
No findings or recommendations
- e. Report on the status of the findings and recommendations
None
- f. Current status of the compliance review
Complete

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.

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

2.3 Title VI Plan Concurrence and Adoption

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

3.0 Title VI Notice to the Public

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

3.1 Notice to Public

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

- 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 Hancock 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 Hancock Transit System's office(s) including the reception desk and meeting rooms, and on the Hancock Transit System's website at hancockcountygga.gov. Additionally, Hancock Transit System will post the notice at stations, stops and on transit vehicles.

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

4.0 Title VI Procedures and Compliance

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

4.1 Complaint Procedure

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

Once the complaint is received, Hancock 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.

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

4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E and on Hancock Transit System's website www.hancockcountyga.gov.

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Hancock 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.

If your agency receives funding from more than one primary recipient, this paragraph should be modified to note that the Title VI Plan will be submitted to all primary recipients, as needed. 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

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

4.5 Sub recipients and Subcontractors

Hancock 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. Hancock 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, Hancock 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 Hancock Transit System, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

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

E-Verify

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

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

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

The Public Participation Plan (PPP) for Hancock 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 Hancock 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 Hancock 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

Hancock 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 Hancock Transit System's recent, current, and planned outreached activities.

- Newspapers
- Flyers

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).

Hancock County Transit System operates a transit system within Hancock County. The Language Assistance Plan (LAP) has been prepared to address Hancock County Transit System's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Hancock County Transit System service area there are 0.29% who describe themselves as not able to communicate in English very well (Source: US Census). Hancock County Transit System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Hancock Count 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.

Hancock County Transit System does not have a transit-related committee or board; therefore, all decisions relating to transit service are made by Hancock County Board of Commissioners, an elected body.

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, Hancock Transit System will ensure the following:

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

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

Hancock 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)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode
- ☐ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

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

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

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.

Hancock 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.

Hancock Transit System is a non-profit 501(c)(3) organization. Our organization is made up of 5 full-time employees, 3 part-time employees, and 0 volunteers. 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 BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2011 Transit Development Plan (page 201) and 2012 Operations Handbook (page 34). We will continue to operate at previous year (2011) service hours averaging 84 total fleet service hours per day or approximately 25,200 annual service hours (assuming 300 operating days).

3. Indicate if your agency is a government authority.

Hancock Transit System operates as a non-profit 501(c)(3) with a CTC agreement with the BCC. We have an executed CTC agreement dated [date].

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

Hancock Transit System's manager is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Transportation Services Manager is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager'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 Hancock County Road Department and/or Ford Dealership. Hancock County Road Department and/or Ford Dealership employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines

document. All vehicle files and driver files are kept on-site at our operations base located at 330 Water Works Rd. Sparta, GA. 31087 and are maintained by the Transit Director. All records are maintained and retained for a minimum of four (4) years.

6. Number of current transportation related employees

Our transportation department has a total of 8 employees that include: 3 full-time drivers, 3 part-time drivers, 1 administrators and 1 support 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.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to [Hancock County citizens]. Our service incorporates a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 95% of the medical trips we provide are to medical facilities out of the county; therefore, our out of county services are directed to the nearby highway corridors that surround this community for optimum efficiency of trip duration and the most convenient route. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes vans, modified vans, and buses. Two (2) of our vehicles are equipped for wheelchair service. We also have a contract provider that can supplement any services that we are unable to accommodate. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 68 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

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

Board Meeting is scheduled for December 19, 2018

Appendix D

Title VI Sample Notice to Public

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

- Hancock 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 Hancock Transit System.
- For more information on Hancock Transit System's civil rights program, and the procedures to file a complaint, contact 706-444-7767, (TTY 1-800-225-0135); email hillcentertransit@yahoo.com; or visit our administrative office at 330 Water Works Road, Sparta, Ga. 31087. For more information, visit hancockcountyga.gov.
- If information is needed in another language, contact 706-444-7767
- 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

Hancock Transit System

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age				
<input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____				
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.				
_____ _____				
Section IV				
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 your complaint.

Signature and date required below

Signature

Date

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

Hancock County Transit System
12630 Broad Street
Sparta, GA 31087

Appendix F

Public Participation Plan (PPP)

Introduction

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

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

Hancock 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 Hancock Transit System website (www.hancockcountygga.gov) and all feedback on the site will be recorded and passed on to Hancock Transit System management. The public will also be able to call the Hancock Transit System office at 706-444-7767 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Hancock 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, Hancock Transit System will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- 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

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

LCB Meetings

Hancock County Transit System is not required to perform LCB meetings.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Hancock County Transit System service area does not have LEP populations which qualify for Language Assistance Plan. [As shown in Appendix H, Hancock County Transit System does not have LEP groups which speak English less than “very well” which exceed either 5.0% or 1,000 person.]

II. 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.

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

Appendix H

Operating Area Language Data:

Hancock Transit System Service Area

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total	8,458	
Speak only English	8,157	96.44%
Spanish or Spanish Creole	203	2.40%
Speak English "very well"	152	1.79%
Speak English less than "very well"	51	0.60%
French (incl. Patois, Cajun)	31	0.33%
Speak English "very well"	31	0.33%
Speak English less than "very well"	0	
French Creole	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Italian	2	0.02%
Speak English "very well"	2	0.02%
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	26	0.30%
Speak English "very well"	12	0.14%
Speak English less than "very well"	14	0.16%
Yiddish	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other West Germanic languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Scandinavian languages	0	
Speak English "very well"	0	
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	5	0.05%
Speak English "very well"	5	0.05%
Speak English less than "very well"	0	
Other Indo-European Languages	1	0.01%
Speak English "very well"	1	0.01%
Speak English less than "very well"	0	
Chinese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Japanese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Korean	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
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	27	0.31%
Speak English “very well”	9	0.1%
Speak English less than “very well”	18	0.21%
Other Pacific Island languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Navajo	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Other Native American languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Hungarian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Arabic	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Hebrew	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
African languages	6	
Speak English “very well”	6	
Speak English less than “very well”	0	
Other and unspecified languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	

Appendix I

Demographic Maps

Figure 15: District 2 Minority EJ Population

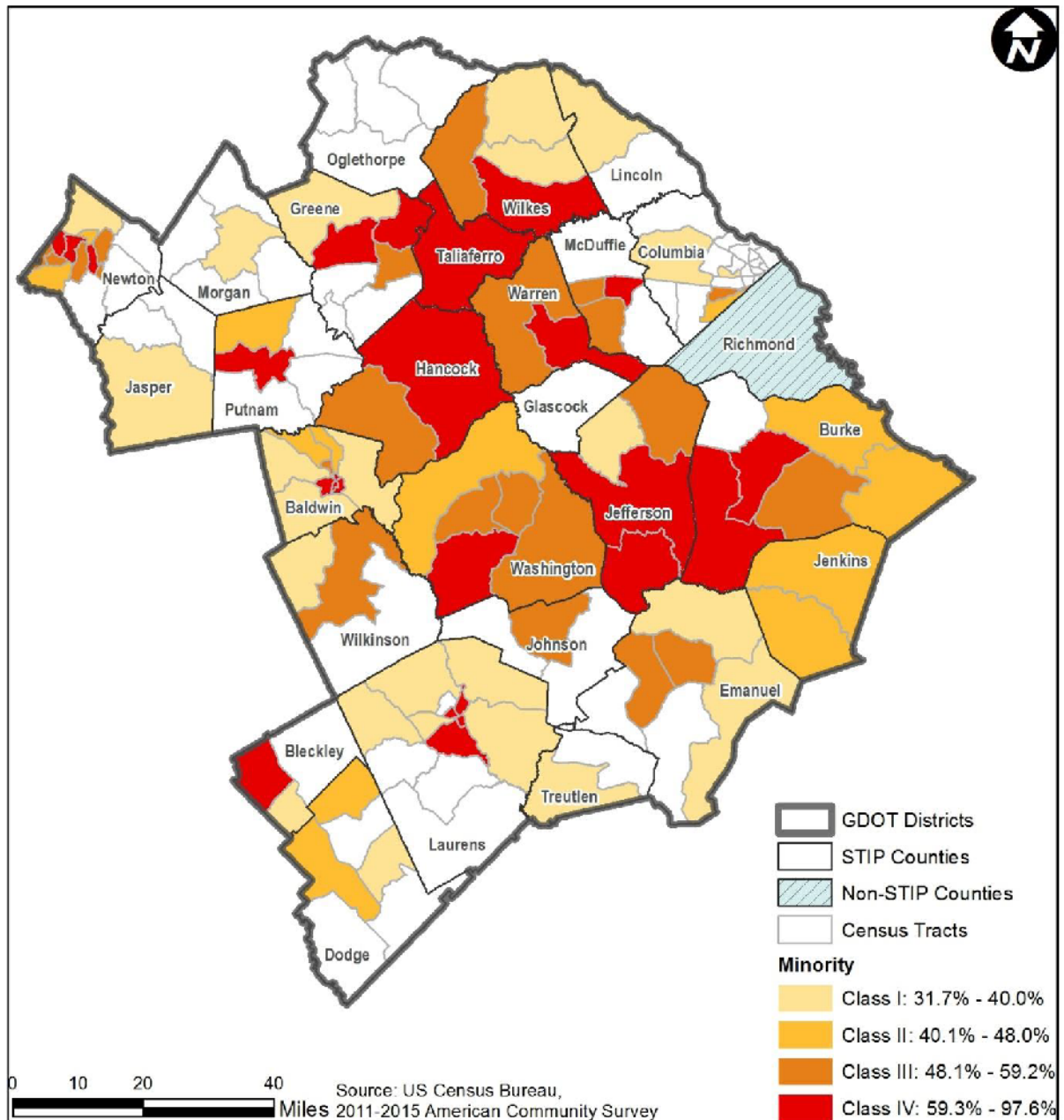


Figure 17: District 2 Low-income EJ Population

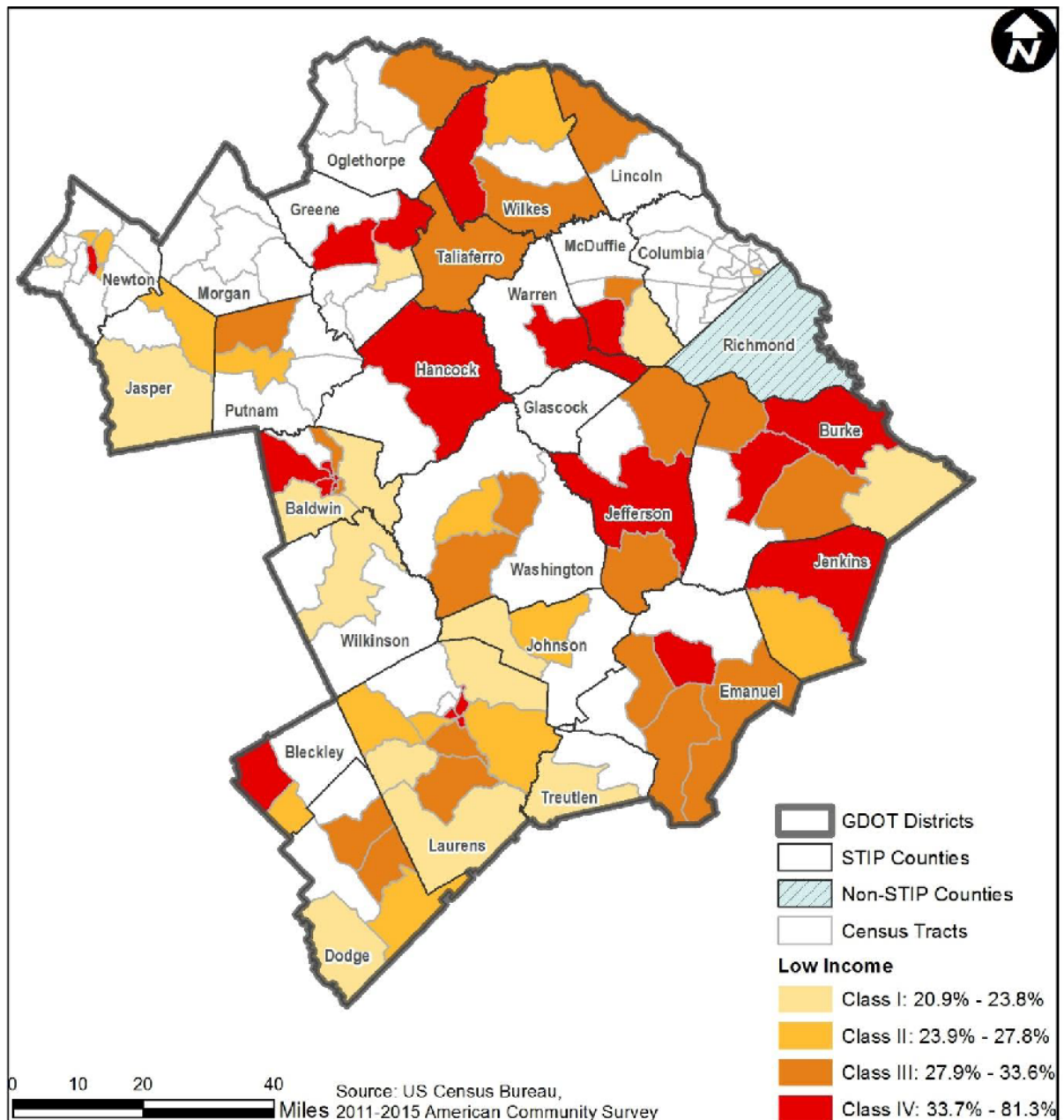
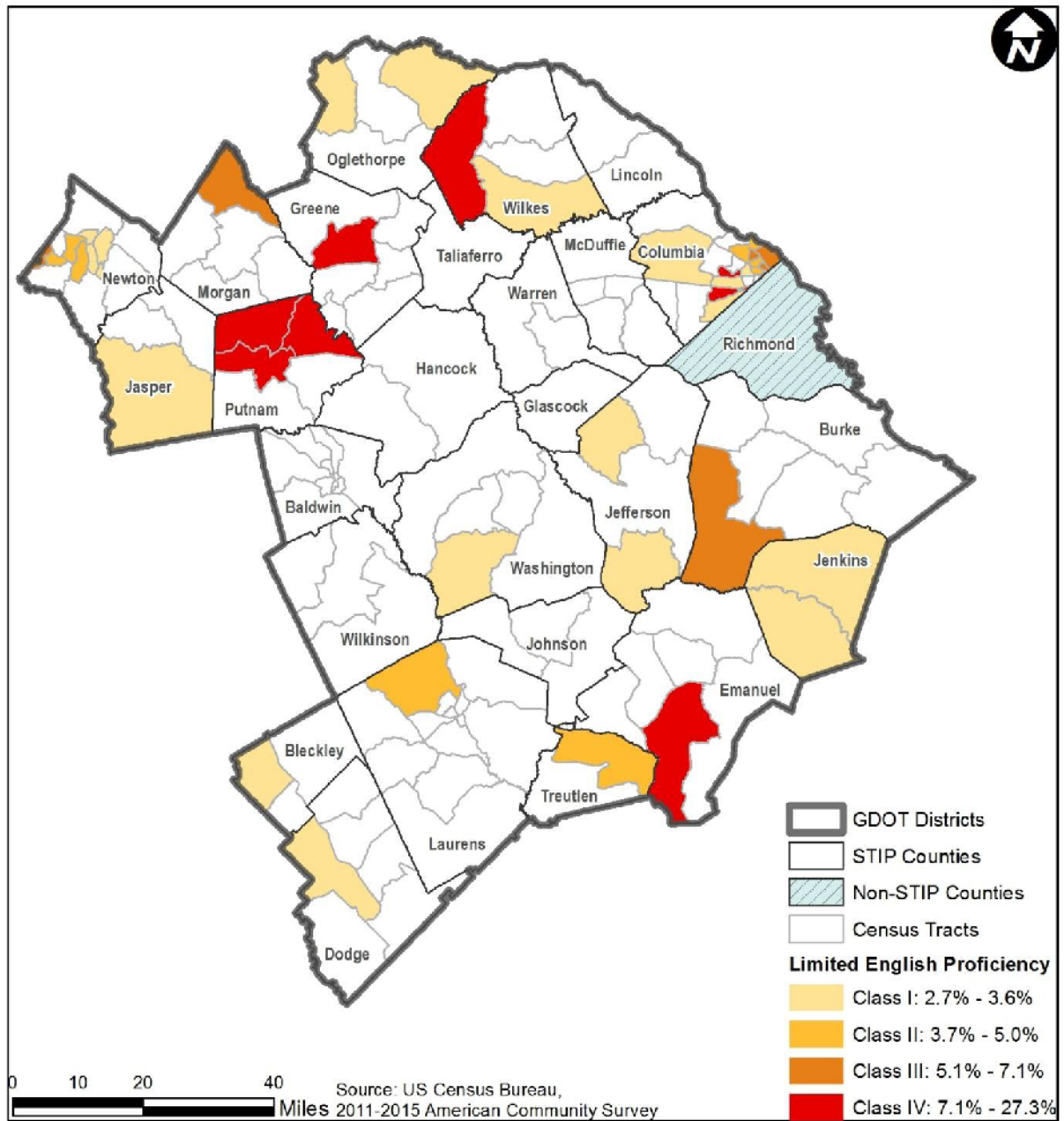


Figure 19: District 2 LEP EJ Population



Appendix J

Title VI Equity Analysis

Hancock County Transit System is not required to perform a Title VI Equity Analysis.

Hancock County Transit has not constructed any transit-related facilities with FTA funding.

