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Comment [NMV2]: Please see section 10 – Error! Bookmark not defined – please make corrections as needed.

6.0 Public Participation Plan

		posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program.
X		Ben Hill Transit System has posted its Title VI notice in the public areas of the System's offices, on board transit vehicles, and on the Ben Hill County website.
X		Has the subrecipient translated the notice into languages other than English consistent with the subrecipient's LEP program?
X		Has the subrecipient documented procedures for investigating and tracking Title VI complaints and for making such complaints available to the public?
X		If yes, does the subrecipient have a specific complaint form? <i>Recipients must develop a Title VI complaint form and the form and procedure for filing a complaint shall be available on the subrecipient's website.</i>
YES	NO	PUBLIC PARTICIPATION PLAN
	X	Has the subrecipient integrated into its established public participation and outreach processes procedures that ensure involvement and participation by minority and LEP populations?
X		Does the outreach process include elements that FTA considers "best practice?" <ul style="list-style-type: none"> Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities – YES Employing different meeting sizes and formats. – NO Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities. – A statement is made indicating that the agency will work with CBOs, but no detail is provided on which groups will be engaged or how the agency will proceed with these activities. Using radio, television, pod casts, or newspaper ads on stations and in publications that serve LEP populations. – NO Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments. – YES

Comment [NMV1]: Please fully address comments in any section where an X is checked in the "No" column. For this notation, explain in your narrative for public participation how you advertise for public hearings, how you reach out to minority populations through various means to promote a public hearing. Also, what steps you take to make reasonable accommodations for the disabled public (while ADA, you must still ensure the public meeting venue is ADA accessible).

7.0 Language Assistance Plan

YES	NO	LIMITED ENGLISH PROFICIENCY
X		Has the subrecipient appropriately applied and documented its Four Factor Analysis to ensure meaningful access to programs and activities?
X		Does the Title VI Policy include the results of the Four Factor Analysis and a description of the LEP population(s) served?
X		Does the subrecipient describe how it provides language assistance services by language?
X		Does the subrecipient describe how it provides notice to LEP persons about the availability of language assistance?
X		Does the subrecipient describe how it monitors, evaluates, and updates the language assess plan?
X		Does the subrecipient describe how it trains employees to provide timely and reasonable language assistance to LEP populations?
X		Does the client translate vital written documents into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by the subrecipient's program and services?
X		If no, was the Safe Harbor Provision appropriately implemented?
		Does the subrecipient train its new and existing employees on the Title VI Policy, and on how to provide timely and reasonable language assistance to LEP populations?
	X	Is that training program documented in the subrecipient's Title VI Plan? The LAP references topics that are part of the Title VI/LEP training for Customer Service Representatives, but no training program content is provided. This is particularly concerning since the transit services are operated by an outsourced service provider that should have standardized training curricula in place.

Comment [NMV2]: Explain what type of training is provided for dispatchers, drivers and others who interface with the public and what they should do if they have a non-English speaking customer needing assistance. Are interpreters available and how are requests handled, etc?

intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The Ben Hill 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 Ben Hill Transit System website (www.benhillcounty.com) and all feedback on the site will be recorded and passed on to The Ben Hill Transit System management. The public will also be able to call the Ben Hill Transit System office at (229) 426-5100 during its hours of operation. Feedback collected over the phone will be recorded and passed on to The Ben Hill 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, The Ben Hill 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.

Comment [BB3]: While Ben Hill Transit System has not met the Safe Harbor provision threshold, its efforts to translate Title VI notices and complaint forms into Spanish suggests that the agency sees engagement with Spanish-speaking persons as a priority for the agency. This section should provide more detail on the procedures the agency would take to engage with community groups that target LEP populations and/or the actual groups that Ben Hill Transit has worked with in the past to conduct this engagement.

The Ben Hill Transit System will assess the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment will include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that there is not a prominent LEP group that meets the Safe Harbor standard of 5% or 1,000 residents.

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

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

After commencing operations, The Ben Hill Transit System will rely on feedback from phone inquiries, staff surveys, System dispatchers, and drivers to determine the number of interactions with LEP persons and the languages they spoke. The Ben Hill Transit System currently has had no requests for translated documents.

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

The Ben Hill Transit System assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: 2 native Spanish speakers on the County staff; one with translation experience. <https://translate.google.com/> provides free basic translation of text; which can then be reviewed and edited by native speakers and focus groups. The Ben Hill Transit System provides a reasonable degree of services for LEP populations in its service area; and is prepared to exceed the Safe Harbor requirements if needed.

Comment [BB4]: What criteria did Ben Hill Transit System use to make the determination of this reasonableness? Since the Title VI Notice and complaint procedures are translated into Spanish without the agency meeting the Safe Harbor provision threshold, it suggests that Spanish-language translation is a priority for the agency. What made them go above and beyond federal requirements?

III. Language Assistance Plan

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

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

The five elements are addressed below.