

Donna Prather

From: stevetomlinson0365@gmail.com
Sent: Tuesday, January 18, 2022 10:48 AM
To: Donna Prather
Cc: Algenia Skinner
Subject: EXTERNAL: Title VI Complaint Form
Attachments: Ben Hill Title VI Plan June 2021 Markup 8.5.21.docx; Ben Hill Title VI Plan RLS Comments 1-17-22.docx

Importance: High

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Donna,

Attached is the Title VI Plan I have made the changes requested by RLS . Please review and sign the Activity Log and submit to RLS . Please copy Algenia and me.

Bethany A. Renner | Associate

3131 S. Dixie Hwy. Suite 545, Dayton, OH 45439
330.704.3405 cell | 937.299.5007 office | www.rlsandassoc.com

Thank you

Steve Tomlinson
Director of Compliance
Resource Management System Inc.
229-834-9225
stevetomlinson136@windstream.net
stevetomlinson0365@gmail.com

Ben Hill Transit System



Title VI Plan



Date Adopted: Month/Day/Year

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
12/04/2018	Prepare first draft for review by DOT	Michael Dinnerman	
3/21/19	Addresses Bronner's comments of the Title VI Review		
6/1/2021	Triannual Update submitted to DOT		
1/17/22	Addressed RLS Comments	Michael Dinnerman	

SUBRECIPIENT TITLE VI POLICY REVIEW

SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

Subrecipient Agency Name: Ben Hill

RLS Reviewer Name: Bethany Renner

Date of Policy:

Date of Desk Review #1: 8/6/21

Date of Desk Review #2:

Title VI Reviewer Checklist

YES	No	PUBLIC NOTICE ELEMENTS
Yes		A statement that the agency operates programs without regard to race, color, and national origin.
Yes		A description of the procedures that members of the public should follow in order to request additional information on the subrecipient's nondiscrimination obligations.
Yes		A description of the procedures that members of the public should follow in order to file a discrimination complaint against the subrecipient. The public should be allowed to contact the subrecipient directly or the FTA Civil Rights Office.
		How has the subrecipient disseminated this notice? <i>Agencies shall inform the public of their rights under Title VI through such measures as 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.</i>
Yes		Has the subrecipient translated the notice into languages other than English consistent with the subrecipient's LEP program?
Yes		Has the subrecipient posted the Title VI notice on the website? Website looks good, just will need to update documents based on this review Is the translated version available on the website?
Yes		Has the subrecipient documented procedures for investigating and tracking Title VI complaints and for making such complaints available to the public?
Yes		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
Yes		Has the subrecipient integrated into its established public participation and outreach processes procedures that ensure involvement and participation by minority and LEP populations?
		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 • Employing different meeting sizes and formats. • 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. • Using radio, television, pod casts, or newspaper ads on stations and in publications that serve LEP populations. • 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	NO	LIMITED ENGLISH PROFICIENCY
Yes		Has the subrecipient appropriately applied and documented its Four Factor Analysis to ensure meaningful access to programs and activities?
Yes		Does the Title VI Policy include the results of the Four Factor Analysis and a description of the LEP population(s) served?
Yes		Does the subrecipient describe how it provides language assistance services by language?
Yes		Does the subrecipient describe how it provides notice to LEP persons about the availability of language assistance?
Yes		Does the subrecipient describe how it monitors, evaluates, and updates the language assess plan?
Yes		Does the subrecipient describe how it trains employees to provide timely and reasonable language assistance to LEP populations?
Yes		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?
Yes		If no, was the Safe Harbor Provision appropriately implemented?
Yes		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? Is that training program documented in the subrecipient's Title VI Plan?

Corrective Actions Notes for the Subrecipient:

Title VI Requirements for Subrecipients	Description of Deficiencies	Corrective Action(s)	Response Due Date	Date Closed
1. Title VI Notice to Beneficiaries	Additional identifiers included in Plan acknowledging more than Title VI recognizes as protected classes which are race, color and national origin.	Race, color and national origin are the only identifiers included in Title VI. Please remove age, disability, family or religious status	8/23/21	Changed to include only race, color

		<p>and ensure it is removed in all additional documents.</p> <p>If you choose to include the categories of age, disability, and family or religious status you must remove them from this sentence (as done in the edit) and add a sentence after each mention, stating that age, disability, family or religious protections are also provided under nondiscrimination laws and executive orders that cover these members. Those nondiscrimination laws include: Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act; Age Discrimination Act of 1975</p>		and national origin.
2. Title VI Complaint Procedures	Additional identifiers included with Complaint Form	Update form to remove the additional protected classes. Only include race, color and national origin or see notes re: a combined complaint form.	8/23/21	Form changed from Title VI Complaint form to Discrimination complaint form to include only race, color and national origin.
3. Record of Title VI Investigations, Complaints, and Lawsuits	No deficiencies.	None.		

4. Public Participation Plan	No deficiencies.	None.		
5. Language Assistance Plan based on LEP	No deficiencies.	None.		
6. Table Depicting Racial Breakdown of the Transit-Related, Non-Elected Planning Boards, Advisory Councils or Committees, or Similar Bodies	No deficiencies.	None.		
7. Policy Format: Footer should have the subrecipient's name. Date on front cover should be updated. Any other formatting issues	No deficiencies.	None.		

Donna Prather

From: Park, Jihyun <JPark@dot.ga.gov>
Sent: Thursday, January 20, 2022 1:34 PM
To: Donna Prather
Cc: Smith, Patricia A; Skinner, Paula A
Subject: EXTERNAL: Title VI Plan Concurrence Letter
Attachments: Ben Hill County Title VI Concurrence Letter FY21.pdf

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Good afternoon,

Attached is your Title VI Plan Concurrence Letter from GDOT. **Please submit a single PDF to GDOT with your final, locally adopted Title VI Plan and minutes from your Board meeting approving the Title VI Plan and this Concurrence letter as an Appendix.**

Thank you.

Jihyun Park, MBA, PMP

Transit Compliance and Asset Management Manager



Division of Intermodal
600 West Peachtree Street NW
6th Floor
Atlanta, GA 30308
404-631-1235 office
678-206-5589 cell

Georgia is a state of natural beauty. And it's a state that spends millions each year cleaning up litter that not only mars that beauty, but also affects road safety, the environment and the economy. Do your part – don't litter. How can you play an active role in protecting the splendor of the Peach State? Find out at <http://keepgaclean.com/>.



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

January 19, 2022

Donna R. Prather
County Clerk
Ben Hill County Commission
402 A East Pine Street
Fitzgerald, GA 31750

Dear Ms. Prather,

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

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

Sincerely,

**Patricia
Smith**

Patricia Smith
Transit Program Manager
Division of Intermodal

Digitally signed by
Patricia Smith
Date: 2022.01.19
11:00:43 -05'00'