

Dodge Transit System




Title VI Plan

Date Adopted: 11/16/2021



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
11/16/2021	Review/Adopted		

**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].

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

Dodge 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 Dodge 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: Conner Bearden, County Manager 11/16/2021

2.0 Introduction & Description of Services

Dodge 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.

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

Title VI Liaison

Kimberly Smith-Parkerson
Dodge County BOC (Sub recipient)
478-374-4361
P.O. Box 818
643 Pearl Bates Ave
Eastman, GA 31023

Alternate Title VI Contact

Ms. Carla Yawn, Fiscal Tech
Middle GA CAA, INC. (TPO)
478-922-4464x 1107
121 Prince Street
Warner Robins, GA 31093

Dodge 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.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

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

Complete the following list, add and remove number as necessary.

Current and Pending FTA Funding

1. Section 5311 Operating 2021, \$17,500.14 (May & June, 2021) pending.

Current and Pending GDOT Funding

Current and Pending Federal Funding (non-FTA)

Current and Pending State Funding (non-GDOT)

During the previous three years, Federal Agency or GDOT did not complete a Title VI compliance review of Dodge Transit System. Dodge Transit System 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.

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

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on 11/8/2021. The Plan was approved and adopted by Dodge Board of Commissioners during a meeting held on 11/16/2021. A copy of the meeting minutes and GDOT

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.

concurrence letter is included in Appendix C of this Plan.

Any additional text for Chapter 2 must be inserted above this point for formatting/page numbering purposes.

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 Dodge 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 Dodge Transit System's office(s) including the reception desk and meeting rooms, and on the Dodge Transit System's website at www.dodgecountyga.com. Additionally, Dodge Transit System will post the notice at stations, stops and on transit vehicles.

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

Once the complaint is received, Dodge 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.

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

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Dodge Transit System's website (www.yourcommunitytransit.com).

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. Dodge Transit System will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

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

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

List of Your Community Transit Sub-recipients

- Middle Georgia Community Action Agency, INC.

4.5 Sub recipients and Subcontractors

Dodge 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. Dodge 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, or sex 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, or sex.
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, Dodge 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 Dodge 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, Dodge 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. Dodge 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 Dodge 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 Dodge Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Dodge 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 Dodge 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), Dodge 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 Dodge 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.

Dodge 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.				
2.				
Lawsuits				
1.				
2.				
Complaints				
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 Dodge 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 Dodge 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 Dodge 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

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

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

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Dodge Transit System operates a transit system within Dodge County. The Language Assistance Plan (LAP) has been prepared to address Dodge 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 Dodge Transit System service area there are 181 residents or 0.915% who describe themselves as not able to communicate in English very well (Source: US Census). Dodge 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. Dodge 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.

Dodge Transit System does not have a transit-related committee or board; therefore, this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

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

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

Dodge Transit System 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

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.

Dodge Transit System is not a fixed route service provider.

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ☐ Title VI Complaint Form
- ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ☐ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- ☐ **A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
- ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ☐ Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.
Dodge 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.
Dodge Transit System is a non-profit organization. Our organization is made up of 4 full-time employees. We utilize the services of a Third Party Operator, who is responsible for the day to day operations of our transit system and reports to our Administrator, who is in direct contact with the Dodge County Board of Commissioners. Transportation services are provided in accordance with FTA and GDOT requirements. Our transportation system is operated eight (8) hours per day, Monday through Friday, except for holidays and inclement weather.
3. Indicate if your agency is a government authority.
Dodge County operates a non-profit County government under the authority of the State of Georgia.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?
The Dodge County Board of Commissioners is responsible for maintaining current liability insurance and vehicle registration. Our TPO 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 the on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, training on proper use of wheel chair lifts and securement devices, defensive driver training, CPR and first aid, and drug and alcohol awareness. It is the dispatcher's and Transit Coordinator's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?
Maintenance on all agency vehicles is provided by the Dodge County maintenance shop. Dodge County employs 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 112 2nd Avenue, Eastman, GA. All records are maintained and retained for a minimum of four (4) years.
6. Number of current transportation related employees
Our transportation department has a total of six (6) employees that include: Three (3) full-time drivers, two (2) part-time administrators.

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

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

**Regular Board Meeting Minutes
Dodge County Board of Commissioners
Tuesday, November 16, 2021**



Commissioners Present:

Dan McCranie, Chairman
Sharon Cobb Flanagan, District 1
Terry L. Niblett, Vice-Chairman, District 2
Brian Watkins, District 3
Karen Cheek, District 4

Also Present:

John P. Harrington, County Attorney
Conner Bearden, County Manager
Kimberly Smith-Parkerson, County Clerk

The Dodge County Board of Commissioners held their regular meeting at the Dodge County Pearl Bates Courthouse Annex at 6:00 p.m. on **Tuesday, November 16, 2021**. Chairman McCranie called the meeting to order and led the Pledge of Allegiance. Next, Commissioner Cheek gave a devotion entitled *A Balanced Life* from Psalm 16, and then, Commissioner Watkins gave the invocation.

Elected Officials/Department Head

A. Michael Johnson – EMS Update

EMS Director Michael Johnson reported October's cash-per-call at \$290.09; however, the latest report showed an increased cash-per-call at \$471.52.

Johnson also requested a three-year service agreement with Cardiotronix totaling \$8,943.00 to service medical equipment. County Manager Bearden reported having \$1,856,545.43 in the 2013 SPLOST for capital expenditures.

Commissioner Niblett made a motion to use the 2013 SPLOST for the three-year service agreement with Cardiotronix providing EMS Director Johnson inquired about a discount for paying in full. Commissioner Watkins seconded the motion. All voted in favor, and the motion passed.

B. Jamey Wilkinson – Fire Coordinator Update

Jamey Wilkinson reported the following:

- Total dispatched calls for October were 91, with 12 fire calls, 79 rescue calls, and 26 non-responses.
- All volunteer fire departments were in compliance with the state after getting non-compliance issues corrected.
- The Threat and Hazard Identification and Risk Assessment audit is in the final stages and is required for Dodge County to be eligible for Homeland Security grants and the Emergency Management Performance Grant, which supplements the EMA director's salary.

Approval of Minutes

November 1, 2021 – Regular Meeting

Commissioner Watkins made a motion to approve the minutes from the regular meeting on November 1, 2021, with no additions, corrections, or deletions. Commissioner Flanagan seconded. All voted in favor, and the motion passed.

Old Business

A. Title VI Adoption

Manager Bearden requested the Board adopt the Title VI plan with concurrence letter in cooperation and compliance of the Federal Transit Administration (FTA) Civil Rights Program. Commissioner Watkins made

a motion to adopt the Title VI plan and concurrence letter. Commissioner Niblett seconded the motion. All voted favorably, and the motion passed.



New Business

A. Approval of Accounts Payable

Commissioner Watkins made a motion to approve the accounts payable list totaling \$56,459.89, and Commissioner Flanagan seconded. All voted in agreement, and the motion passed to approve the accounts payable list.

B. Spriggs Group Master Architect Agreement

Manager Bearden requested approval of the Spriggs Group Master Architect Agreement. Attorney Harrington requested a strike through of item marked void on page three. Commissioner Niblett requested clarification of the HVAC Systems Demolition on page three totaling \$44,498. Attorney Harrington also requested to see Exhibit 1.

Commissioner Watkins made a motion to table the Spriggs Group Master Architect Agreement until further clarification. Commissioner Niblett seconded. All voted in favor, and the item was tabled.

C. Drug and Alcohol Policy for Transit

Manager Bearden reported Transit had an option for a second-chance drug and alcohol policy, but he recommended Dodge County keep its zero-tolerance policy. Commissioner Niblett made a motion to approve the zero-tolerance Drug and Alcohol Policy for Transit. Commissioner Watkins seconded the motion. All voted yes, and the motion passed.

D. Speed Limit on Sweet Home Church Road

Manager Bearden presented a request on behalf of Teresa Jones to reduce the speed limit to 45 mph from Milan-Chauncey Road to the curve before Sweet Home Baptist Church. Bearden confirmed he'd consulted with Sheriff Brian Robinson. After discussion among the Board, Commissioner Watkins suggested placing caution signs at the curves rather than reducing the speed limit. No motions were made.

E. Courthouse Clean-Out

Manager Bearden requested to close business offices for a day to clean out the courthouse at Courthouse Circle. Bearden indicated he would confer with the departments before setting the date. No motion was made at the present meeting.

F. FY 2022 County Budget

Manager Bearden presented the Board with a proposed budget for fiscal year 2022. A public hearing for the budget is to be scheduled December 6 at 5:30 p.m.

G. Bailiff Per Diem

Manager Bearden reported the Grand Jury convened on November 4, and at that meeting, they recommended increasing the bailiffs' per diem to \$55 to compensate for payroll taxes. (Currently, the per diem is \$45.) Keith Mullis was re-appointed to the Tax Equalization Board. (Amy Taylor was re-appointed as alternate).

Commissioner Watkins made a motion to increase bailiff per diem to \$55. Commissioner Cheek seconded the motion. All voted agreeably, and the motion passed.

Commissioner Reports

Chairman McCranie and Commissioner Flanagan reported attending the ACCG Reconnect Conference. Commissioner Flanagan summarized the top four priorities, as follows:

- Expansion of sales tax to include digital goods
- Continuation of single-county TSPLOST until maximum time period is reached
- Mental health reform
- Increase tag and title fees to fund county administrative costs



County Manager Report: Conner Bearden

Manager Bearden reported Qualified Local Government (QLG) requirements had been completed as affirmed by the Department of Community Affairs (DCA).

Manager Bearden and EMS Director Johnson discussed Dodge County Hospital's new policy for covid-19 vaccinations, which had been implemented to comply with CMS (Centers for Medicare and Medicaid Services) guidelines. Although CMS guidelines do not apply to employers with less than 50 employees, Manager Bearden reported the County's EMS department will need to follow the same guidelines in order to receive transfers from the hospital.

Manager Bearden announced a ribbon cutting for the Ochise Bubbling Waters boat landing.

Public Comments

None presented.

Adjournment

With no further business to address, Commissioner Watkins made a motion to adjourn at 6:54 p.m. Commissioner Niblett seconded; all voted in favor, and the meeting adjourned.

Attested:

A handwritten signature in blue ink, reading "Kimberly Smith-Parkerson".

Kimberly Smith-Parkerson, County Clerk

Approved:

A handwritten signature in blue ink, reading "Dan McCranie".

Dan McCranie, Chairman



November 4, 2021

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

Conner Bearden
Dodge County
PO Box 818
643 Pearl Bates Avenue
Eastman, GA 31023

Dear Mr. Bearden,

The 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 Ashley Finch, Rail/Transit Planner directly at afinch@dot.ga.gov or (470) 432-1751.

Sincerely,

Patricia Smith
Transit Program Manager
Division of Intermodal

Appendix D

Title VI Notice to Public

Notifying the Public of Rights Under Title VI

Dodge Transit System

- Dodge 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 Dodge Transit System.
- Dodge Transit System opera sus programas y servicios sin importar la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por alguna práctica discriminatoria ilegal bajo el Título VI puede resenar una queja ante Dodge Transit System.
- For more information on Dodge Transit System's civil rights program, and the procedures to file a complaint, contact 478-374-2261; email dodgetransit@mgcaa.org; or visit our administrative office at 112 2nd Avenue Eastman, Ga 31023. For more information, visit www.dodgecountyga.com.
- Para obtener más información sobre el programa de derechos civiles de Dodge Transit System y los procedimientos para presentar una queja, comuníquese al 478-374-2261; correo electrónico dodgetransit@mgcaa.org; o visite nuestra oficina administrativa en 112 2nd Avenue Eastman, Ga 31023. Para obtener más información, visite www.dodgecountyga.com.
- If information is needed in another language, contact 478-374-2261.
- 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
- También puede presentar su queja directamente ante la FTA en: Oficina de Derechos Civiles de la Administración Federal de Tránsito Atención: Coordinador del Programa Título VI, Edificio Este, 5to Piso – TCR 1200 New Jersey Ave., SE, Washington, DC 20590

TTY/TDD: (800) 877-8339 or (800) 845-6136 (Spanish)

Appendix E

Title VI Complaint Form

Dodge 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"/> 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:

Ms. Debbie Pittman

Dodge Transit System

112 2nd Avenue

Eastman, Ga 31023

Dodge Transit System

Formulario de Queja

Nombre de la persona que presenta la queja _____

Domicilio del participante _____

Ciudad, Estado, Código Postal _____

Teléfono de la casa _____ Teléfono de trabajo _____

Dirección de correo electrónico _____

Raza/grupo étnico _____ Género F ☐ M ☐

Persona discriminada (si no es la misma que presenta la queja)

Domicilio particular _____

Ciudad, Estado, Código Postal _____

Teléfono de casa _____ Teléfono de trabajo _____

1. FUNDAMENTO ESPECÍFICO DE LA DISCRIMINACIÓN (Marque los casilleros que correspondan):

Raza ☐ Color ☐ Origen Nacional ☐ Situación Económica ☐

Dominio Limitado de Inglés ☐ Discriminado de otra manera ☐

2. Fecha del presunto acto o actos de discriminación: _____

3. DEMANDADO (persona contra la cual se presenta la queja):

Nombre _____

Puesto de trabajo _____

Lugar de trabajo _____

Raza/grupo étnico _____

4. Describa de que manera fue discriminado. Que sucedio y quienes fueron los responsables?

Si necesita mas espacio adjunte hojas adicionales, _____

5. Presento esa demanda ante otra agencia local, estatal, o federal, o ante un tribunal estatal o federal? Si ☐ No ☐

6. Si la respuesta es si, marque los casilleros ante los cuales presento la demanda:

Agencia Federal ☐ Tribunal Fedreral ☐ Agencia Estatal ☐

Tribunal Estatal ☐ Agencia Local ☐

Fecha de presentacion: _____

7. Proporcione informacion de contacto de un representante del organismo adicional (agencia o tribunalante el cual presento la demanda:

Nombre _____

Domicilio _____

Ciudad, Estado,Codigo Postal _____

Telefono _____

Firme esta demanda en el espacio que figura a continuacion.

Firma

Fecha

The complaint may be filed in writing with Dodge Transit as follows:

Ms. Debbie Pittman

Dodge Transit System

112 2nd Avenue

Eastman, Ga 31023

Appendix F

Public Participation Plan (PPP)

The Public Participation Plan (PPP) is an open ended plan which should be tailored to the needs and capabilities of your agency. The following is a rough template for a possible PPP for a typical sub-recipient transit agency. The plan should be modified to match the public participation needs of your agency with capabilities of your agency. FTA Circular 4702.1B provides little concrete guidance to the contents of the PPP. The following are instructions from FTA Circular 4702.1B with regards to the PPP:

“Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program and/or service under consideration, and the resources available.”

“Some of those effective practices include:

- a. Scheduling meeting at times and locations that are convenient and accessible for minority and LEP communities.
- b. Employing different meeting sizes and formats.
- c. 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.
- d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- e. 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 communication. “

Introduction

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

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

Dodge 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.

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, Dodge 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

Dodge County Transit has not initiated significant changes in number of vehicles, scope of service, transit policies, personnel or fare structure. Dodge County does have a public hearing prior to grant submission each year.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Dodge Transit System operates a transit system within Dodge County. The Language Assistance Plan (LAP) has been prepared to address Dodge 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 Dodge Transit System service area there are 181 residents or 0.915% who describe themselves as not able to communicate in English "very well" (Source: US Census). Dodge 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. Dodge Transit System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Dodge Transit System be able to communicate effectively with all of its riders. When Dodge Transit System is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Dodge Transit System is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Dodge Transit System undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents

- Staffing: Identifying Dodge Transit System staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Dodge Transit System services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Dodge Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Dodge Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Dodge Transit System to the LEP population.
4. The resources available to Dodge Transit System and overall costs to provide LEP assistance

a. Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Of the 19,764 residents in the Dodge Transit System service area 181 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Dodge Transit System services. For the Dodge Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 97% speak English “very well”. For groups who speak English “less than very well”, 2% speak Spanish and 1% speak other Indo-European languages.

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

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

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Dodge Transit System has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that the Spanish speaking population would present the largest possibility of encountering LEP, but no encounters have been reported. Phone

inquiries and staff survey feedback indicated that Dodge Transit System dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past three (3) years, Dodge Transit System has had no requests for translated documents.

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

Public transportation 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.

Public transportation in Dodge County has a strong presence. As previously stated, patrons requested transportation to employment, education, nutrition, social services, shopping, medical, and recreation. Dodge Transit System average approximately 1,063 trips per month.

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

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

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

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

III. Language Assistance Plan

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

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

The five elements are addressed below.

a. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Dodge Transit System has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 97% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish 2%. Of those whose primary spoken language is Spanish, approximately 0.43% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 0.42% of the service area population.

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

1. Having Census Bureau Language Identification Flashcards available at Dodge Transit System Meetings. This will assist Dodge Transit System in identifying language assistance needs for future events and meetings.
2. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Dodge Transit System management to follow-up.
3. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

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

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Provide Language Identification Flashcards onboard transit vehicles and in the Dodge Transit System offices.
3. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
4. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

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 Dodge Transit System, 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. We have not received any requests for language assistance
4. How to handle a potential Title VI/LEP complaint:
Section 4.1 of this Title VI Plan provides specific instructions for evaluation of a complaint, and specific guidelines and time frames that specific actions must be taken.

d. Element 4: Providing Note to LEP Persons

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

e. Element 5: Monitoring and Updating the Plan

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

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

Dodge Transit System understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Dodge Transit System is open to suggestions from all sources, including customers, Dodge Transit System staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

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

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Dodge Transit System may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H

Operating Area Language Data: Dodge Transit System Service Area

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total	19764	
Speak only English	19130	96.79%
Spanish or Spanish Creole	488	2.46%
Speak English “very well”	343	1.73%
Speak English less than “very well”	145	.73%
French (incl. Patois, Cajun)	36	.18%
Speak English “very well”	18	.09%
Speak English less than “very well”	18	.09%
French Creole		
Speak English “very well”		
Speak English less than “very well”		
Italian		
Speak English “very well”		
Speak English less than “very well”		
Portuguese or Portuguese Creole		
Speak English “very well”		
Speak English less than “very well”		
German	24	.12%
Speak English “very well”	24	.12%
Speak English less than “very well”		
Yiddish		
Speak English “very well”		
Speak English less than “very well”		
Other West Germanic languages		
Speak English “very well”		
Speak English less than “very well”		
Scandinavian languages		
Speak English “very well”		
Speak English less than “very well”		
Greek		
Speak English “very well”		
Speak English less than “very well”		
Russian		
Speak English “very well”		
Speak English less than “very well”		
Polish		
Speak English “very well”		
Speak English less than “very well”		
Serbo-Croatian		
Speak English “very well”		

Language	County	Percent of Population
Speak English less than “very well”		
Other Slavic Languages		
Speak English “very well”		
Speak English less than “very well”		
Armenian		
Speak English “very well”		
Speak English less than “very well”		
Persian		
Speak English “very well”		
Speak English less than “very well”		
Gujarati		
Speak English “very well”		
Speak English less than “very well”		
Hindi		
Speak English “very well”		
Speak English less than “very well”		
Urdu		
Speak English “very well”		
Speak English less than “very well”		
Other Indic languages		
Speak English “very well”		
Speak English less than “very well”		
Other Indo-European Languages	71	.359%
Speak English “very well”	39	.197%
Speak English less than “very well”	32	.161%
Chinese	10	.05%
Speak English “very well”	10	.05%
Speak English less than “very well”		
Japanese		
Speak English “very well”		
Speak English less than “very well”		
Korean		
Speak English “very well”		
Speak English less than “very well”		
Mon-Khmer, Cambodian		
Speak English “very well”		
Speak English less than “very well”		
Hmong		
Speak English “very well”		
Speak English less than “very well”		
Thai		

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Speak English “very well”		
Speak English less than “very well”		
Laotian		
Speak English “very well”		
Speak English less than “very well”		
Vietnamese	5	.025%
Speak English “very well”		
Speak English less than “very well”	5	.025%
Other Asian languages		
Speak English “very well”		
Speak English less than “very well”		
Tagalog		
Speak English “very well”		
Speak English less than “very well”		
Other Pacific Island languages		
Speak English “very well”		
Speak English less than “very well”		
Navajo		
Speak English “very well”		
Speak English less than “very well”		
Other Native American languages		
Speak English “very well”		
Speak English less than “very well”		
Hungarian		
Speak English “very well”		
Speak English less than “very well”		
Arabic		
Speak English “very well”		
Speak English less than “very well”		
Hebrew		
Speak English “very well”		
Speak English less than “very well”		
African languages		
Speak English “very well”		
Speak English less than “very well”		
Other and unspecified languages		
Speak English “very well”		
Speak English less than “very well”		

Appendix I

Demographic Maps

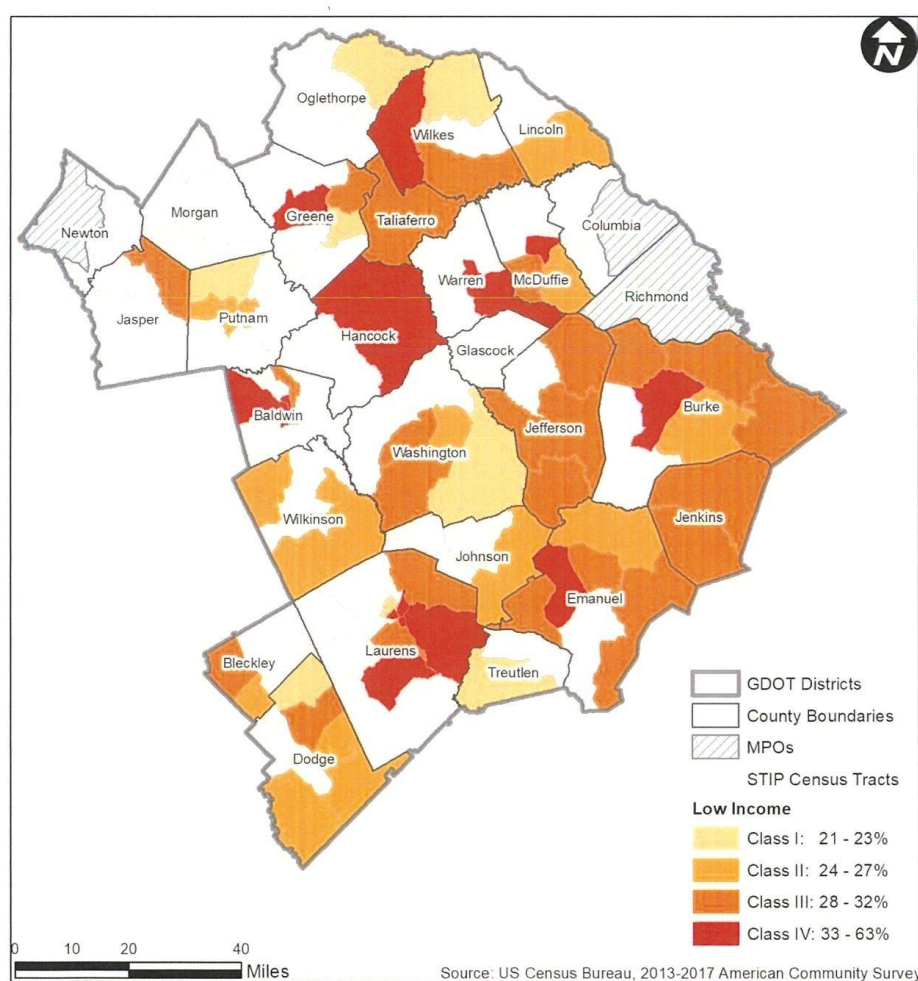


Environmental Justice Identification & Proposed Outreach Report

5.2.2 Low-income EJ Population

Figure 16 is a map of the low-income EJ population located in District 2. Within District 2, 55 percent of the tracts have a low-income population above the minority EJ threshold. The analysis shows 16 Class IV tracts located in the following counties: Baldwin, Burke, Emmanuel, Greene, Hancock, Laurens, McDuffie, Warren, and Wilkes. The analysis also shows 23 Class III tracts, 15 Class II tracts, and 8 Class I tracts. Tract locations can be found in Figure 16.

Figure 16: District 2 Low-income EJ Population



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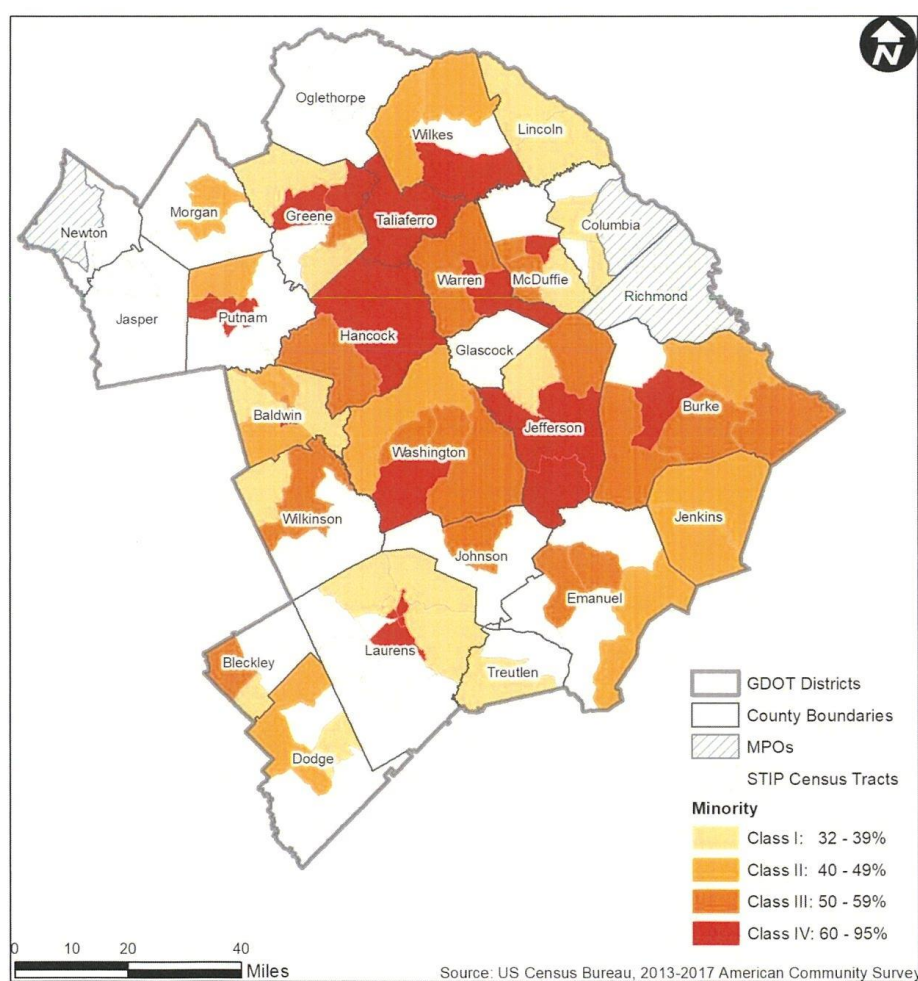


Environmental Justice Identification & Proposed Outreach Report

5.2.1 Minority EJ Population

Figure 15 is a map of the minority EJ population located in District 2. Within District 2, 63 percent of the tracts have a minority population above the minority EJ threshold. The analysis shows 19 Class IV tracts located in the following counties: Baldwin, Burke, Greene, Hancock, Jefferson, Laurens, McDuffie, Putnam, Taliaferro, Warren, Washington and Wilkes. The analysis also shows 19 Class III tracts, 14 Class II tracts, and 18 Class I tracts. Tract locations can be found in Figure 15.

Figure 15: District 2 Minority EJ Population



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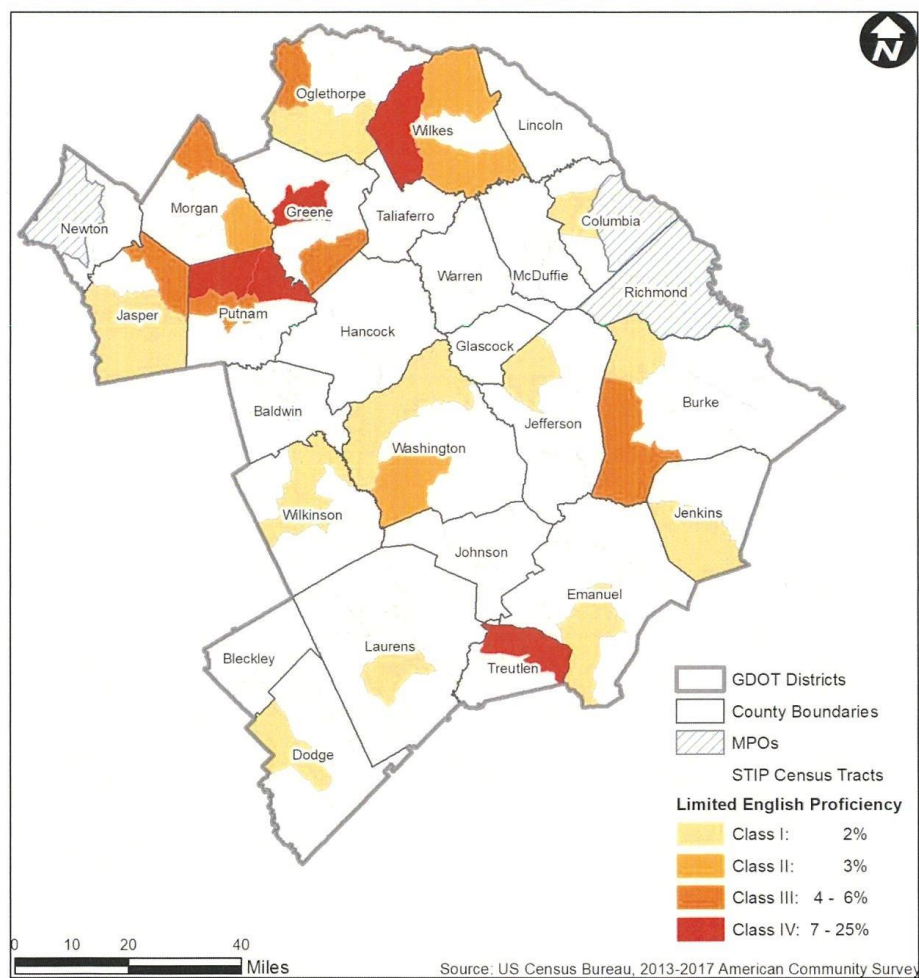


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5.2.4 LEP EJ Population

Figure 18 is a map of the LEP EJ population located in District 2. Within District 2, 23 percent of the tracts have a LEP population above the LEP EJ threshold. The analysis shows 5 Class IV tracts located in the following counties: Greene, Putnam, Treutlen, and Wilkes. The analysis also shows 6 Class III tracts, 4 Class II tracts, and 11 Class I tracts. Tract locations can be found in Figure 18.

Figure 18: District 2 LEP EJ Population



Appendix J

Title VI Equity Analysis

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



"I SPEAK" FLASHCARD

- | | | |
|--------------------------|---|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Խոսողո՞ւմ ե՞սք նշում կատարե՞ք այս բառակոստում, եթե խոսում կամ կարդում եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | ឈ្មូចបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin untungnu' manaitai pat untungnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

- | | | |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această căsuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратик уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้ทำเครื่องหมายลงในช่องว่างที่ว่างหรือพูดภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> | Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | 37. Vietnamese |
| <input type="checkbox"/> | באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |