

# Pulaski Transit System



## Title VI Plan

*Date Adopted: August 5, 2019*



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## 1.0 Title VI/Non-Discrimination Policy Statement and Management Commitment to Title VI Plan

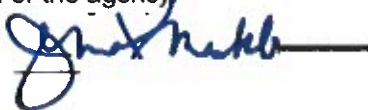
Pulaski Transit System assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit laws, 49 CFR Part 21 Unlawful Discrimination, Non-discrimination 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.

Pulaski 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 Pulaski 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: Ms. Jenna Mashburn Sole Commissioner, Pulaski County Commission Date: 8/5/2019  
Executive Director/Signatory Authority, Organization, Date: Month/Day/Year

## 2.0 Introduction & Description of Services

Pulaski 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.

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

Mrs. Laurie Oberthorn, County Clerk  
Pulaski County BOC (Sub-recipient)  
478-783-4154  
45 S. Lumpkin St.  
Hawkinsville, GA 31036

### Alternate Title VI Contact

Carla Yawn, Financial Specialist  
Middle GA. CAA, Inc. (TPO)  
478-922-4464  
121 Prince St.  
Warner Robins, GA 31093

Pulaski 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 4702.18, 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.*

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

### Current and Pending FTA Funding

1. Section 5311 Operating, 2019, \$33,145, Pending

### Current and Pending GDOT Funding

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

### Current and Pending Federal Funding (non-FTA)

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

### Current and Pending State Funding (non-GDOT)

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

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

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

### Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on date. The Plan was approved and adopted by Pulaski Transit System's Board of Directors during a meeting held on date. A copy of the meeting minutes and

*FTA Circular 4702.18, 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.*

GDOT concurrence letter is included in Appendix C of this Plan.



### 3.0 Title VI Notice to the Public

*FTA Circular 4702.18, 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. For more information on Pulaski County Transit System's civil rights program, and the procedures to file a complaint, refer to Section 2.0 - Introduction.

#### 3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Pulaski 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 Pulaski Transit System's office(s) including the reception desk and meeting rooms, and on the Pulaski Transit System's website at [www.pulaskico.com](http://www.pulaskico.com). Additionally, Pulaski Transit System will post the notice at stations, stops, and on transit vehicles.

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

## 4.0 Title VI Procedures and Compliance

*FTA Circular 4702.18, 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 Pulaski Transit System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Pulaski Transit System investigates complaints received no more than 180 days after the alleged incident. Pulaski Transit System will process complaints that are complete.

Once the complaint is received, Pulaski 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.

Pulaski Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Pulaski 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, Pulaski 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 Pulaski Transit System's website (<http://www.pulaskico.com/>).

### 4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Pulaski Transit System's website (<http://www.pulaskico.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. Pulaski 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

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

### 4.5 Sub recipients and Subcontractors

Pulaski 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. Pulaski Transit System, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

#### **Nondiscrimination Clauses**

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Pulaski 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 Pulaski 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, Pulaski 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. Pulaski 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 Pulaski 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 Pulaski Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or

providing services pursuant to work for Pulaski 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 Pulaski Transit System.

## 5.0 Title VI Investigations, Complaints, and Lawsuits

*FTA Circular 4702.18, 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), Pulaski 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 Pulaski 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 and/or other primary recipient.

Pulaski 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 4702.18, 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 Pulaski 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 Pulaski 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 Pulaski 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

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

- Each year during Grant Application, Pulaski 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 4702.18, 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).*

Pulaski Transit System operates a transit system within Pulaski County. The Language Assistance Plan (LAP) has been prepared to address Pulaski 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 Pulaski Transit System service area, there are 169 residents or 1.5% who describe themselves as not able to communicate in English very well (Source: US Census). Pulaski 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. Pulaski 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 4702.18, 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.*

Pulaski 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.B: 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, Pulaski Transit System will ensure the following:

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

Pulaski Transit System has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Pulaski Transit System does not have any Title VI Equity Analysis reports to submit with this Plan. Pulaski Transit System will utilize the demographic maps included in Appendix I or 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.*

Pulaski Transit System is not a fixed route service provider.

## 11.0 Appendices

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# Appendix A

## FTA Circular 4702.18 Reporting Requirements for Transit Providers

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

## General Requirements

*All recipients must submit:*

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

## Requirements of Transit Providers

*All Fixed Route Transit Providers must submit:*

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
  - o Vehicle load for each mode
  - o Vehicle headway for each mode
  - o On time performance for each mode
  - o Service availability for each mode
- ☐ Service policies
  - o Transit Amenities for each mode
  - o Vehicle Assignment for each mode



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

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

# Appendix B

## Current System Description

### Current System Description

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

Pulaski 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.

Pulaski Transit System is a non-profit organization. Our organization is made up of 2 full-time employees and 2 part-time employees. We utilize the services of a TPO, who is responsible for all of the day-to-day operations of our organization and reports to our Revenue County Clerk, who is in direct contact with our Board of County Commissioners (BCC). Transportation services are provided in accordance with the FTA and DOT requirements. Our transportation system is operated 8 hours per day, Monday through Friday except holidays or inclement weather.

3. Indicate if your agency is a government authority.

Pulaski County operates as a non-profit county government under authority of the state of Georgia.

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

Pulaski County BCC is responsible for maintaining current liability insurance and vehicle registration renewal for GDOT and County owned vehicles. 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 as part of their new hire orientation. All new employees are also required to complete on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, wheel chair lift and securement training, defensive driver training, CPR and first aid, drug and alcohol awareness, as well as current driver's license, criminal background, and MVR checks. 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.

S. Who provides vehicle maintenance and record keeping?

Maintenance on all agency vehicles is provided by ASE approved shops or dealerships. All maintenance is performed using the GDOT Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files are kept on-site at our operations site at 83 Lumpkin St., Hawkinsville, Ga. and all driver files are kept at Transit Coordinator's office at 324 Pine St., 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 4 employees that include: 1 Dispatcher, 1 full-time driver, and 2 part-time administrative.

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. None of our GDOT vehicles require a CDL license.

8. A detailed description of service routes and ridership numbers

Our service **area** includes all of Pulaski 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 Pulaski 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/deboarding and stability. Our vehicle is equipped with a wheelchair lift.

# **Appendix C**

## **Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter**

**AGENDA  
COMMISSIONER'S MEETING  
MONDAY, AUGUST 5, 2019  
10:00 A.M.**

1. Archway Report
2. Sheriff's Report
3. Public Safety Report
4. Budget Amendments 2018
5. 2019-2020 Third Party Operator Agreement for GA DOT5311
6. Transit Title VI Plan
7. Floor Comments



## Minutes of Regular Meeting

The regular meeting of the Commissioner of Pulaski County was held at 10:00 a.m., August 5, 2019 for the purpose of attending to the affairs of Pulaski County as related to the Commissioner's office.

Commissioner Mashburn led in the Pledge of Allegiance and Skip McDannald gave the invocation.

The first item of business was to hear from Archway. No one was present to give a report.

The second item of business was to hear a report from the Sheriff's Office. No one was present to give a report.

The third item of business was to hear a report from Public Safety. No one was present to give a report.

The fourth item of business was to approve the 2019-2020 Third Party Operator Agreement for GA DOT 5311 and the Title VI Plan for Transit.

The fifth item of business was for Commissioner Mashburn to approve budget amendments for 2018.

The sixth item of business was to hear floor comments. There were none.

There being no further business the meeting was adjourned

Present for this Commissioner's meeting was Ken Clark, Leslie Sewell, Skip McDannald, Shelly Berryhill, Sherrie Raleigh, Molly Teutsch, and Commissioner Mashburn.



Jenna S. Mashburn  
Sole Commissioner



Molly Teutsch  
County Clerk

---

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

# **Appendix D**

## **Title VI Sample Notice to Public**

## **Notifying the Public of Rights Under Title VI**

### **Pulaski County Transit System**

- Pulaski County 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 Pulaski County Transit System.
- For more information, contact 478-783-1013, email [pulaskitransit@mqcaa.org](mailto:pulaskitransit@mqcaa.org), or visit our office at 83 Lumpkin St., Hawkinsville, GA 31036. For more information, visit [www.pulaskico.com](http://www.pulaskico.com).
- If information is needed in another language, contact 478-783-1013.
- You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Ave., SE, Washington, DC 20590

# **Appendix E**

## **Title VI Complaint Form**

# Pulaski Transit System

## Title VI Complaint Form

<b>Section I:</b>			
Name:			
Address:			
Electronic Mail Address:			
Accessible Format Requirements?	Large Print TDD	Audio Tape Other	
<b>Section II:</b>			
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
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age
<input type="checkbox"/> Disability	<input type="checkbox"/> Family or Religious Status	<input type="checkbox"/> Other (explain)	
Date of Alleged Discrimination (Month, Day, Year):			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
<b>Section IV</b>			
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 Court

☐ State Agency

☐ 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. Sheena Giberson  
Pulaski Transit System  
83 Lumpkin St.  
Hawkinsville, GA 31036

**PULASKI COUNTY  
COMPLAINT FORM  
Formulario de Queja**

Nombre de la persona que presenta la queja \_\_\_\_\_

Domicilio del participante \_\_\_\_\_

Ciudad, Estado, Codigo Postal \_\_\_\_\_

Telefono de la casa \_\_\_\_\_ Telefono de trabajo \_\_\_\_\_

Direccion de correo electronico \_\_\_\_\_

Raza/grupo etnico \_\_\_\_\_ Genero ☐ F ☐ M ☐

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

Domicilio particular \_\_\_\_\_

Ciudad, Estado, Codigo Postal \_\_\_\_\_

Telefono de casa \_\_\_\_\_ Telefono de trabajo \_\_\_\_\_

1. FUNDAMENTO ESPECIFICO DE LA DISCRIMINACION (Marque los casilleros que correspondan):

Raza ☐ a ☐ Color ☐ Origen Nacional ☐ Situacion Economica ☐  
 Dominio Limitado de Ingles ☐ Discriminado de otra manera ☐

2. Fecha del presunto acto o actos de discriminacion: \_\_\_\_\_

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

Nombre \_\_\_\_\_

Puestode trabajo \_\_\_\_\_

Lugar de trabajo \_\_\_\_\_

Raz.a/grupo etnico \_\_\_\_\_

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 tribunal ante el cual presento la demanda:

Nombre \_\_\_\_\_

Domicio \_\_\_\_\_

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 PULASKI COUNTY as follows:

Pulaski County Transit System  
Attn: Sheena Giberson  
83 Lumpkin St.  
Hawkinsville, GA 31036

## **Title VI Complaint Procedures**

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

Once the complaint is received, Pulaski County 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.

Pulaski County Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Pulaski County 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, Pulaski County 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 Pulaski County's website <http://www.pulaskico.com/>.

# AppendixF

## 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. "

With these instructions in mind, please add or remove items from the template as you see fit. The majority of the plan is shown in green text to indicate the flexibility in the plan.

## Introduction

The Public Participation Plan (PPP) for Pulaski Transit System was developed to ensure that all members of the public are encouraged to participate in the decisions of Pulaski Transit System. Pulaski Transit System also recognizes the importance of many types of stakeholders in the decision-making process, including community-based organizations, major employers, general public including low-income, minority, and LEP.

## Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public to comment about Pulaski Transit System and its operations.

## Public Participation Method

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Pulaski Transit System. Pulaski Transit System intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The public are invited to provide feedback on the County Commission website [www.pulaskico.com](http://www.pulaskico.com) and all feedback on the site will be recorded and passed on to Pulaski Transit System management. The public will also be able to call the Pulaski Transit System office at 478-783-1013 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Pulaski Transit System management.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit.

For community meetings and other important information, Pulaski 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
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information

All information and materials communicating proposed and actual service adjustments will be provided in English and another prevalent language as requested.

**Public Hearing**

The agency is not required to perform public hearings.

**LCB Meetings**

Discuss how the agency conducts the LCB meetings in this section.

# Appendix G

## Language Assistance Plan (LAP)



## I. **Introduction**

Pulaski Transit System operates a transit system within Pulaski County. The Language Assistance Plan (LAP) has been prepared to address Pulaski Transit System's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP) (those who have a limited ability to read, write, speak or understand English). In Pulaski Transit System service area, 1.5% of residents describe themselves as "able to communicate in English "very well" (Source: US Census). Pulaski Transit System considered the following factors in evaluation of the 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 111-6 to 111-9).

## II. **Four Factor Analysis**

The **analysis** provided in this report has been developed to identify LEP population that may use Pulaski 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 Pulaski Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Pulaski Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Pulaski Transit System to the LEP population.
4. The resources available to Pulaski 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 11,000 residents in the Pulaski Transit System service area 169 residents describe themselves as speaking English less than "very well". People of Spanish descent are the primary LEP persons likely to utilize Pulaski Transit System services. For the Pulaski Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 95% speak English "very well". For groups who speak English "less than very well", 1.4% speak Spanish and .15% speak Chinese.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Pulaski 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.

Pulaski 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 Spanish speaking population would present the largest possibility of encountering LEP, but no encounters have been reported. Over the past 3 years, Pulaski 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 in Pulaski County has a strong presence. As previously stated, patrons request transportation to employment, education, nutrition, social services, shopping, medical, & recreation. Pulaski County Transit System **averages** approximately 372 passenger trips per month.

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

The County will continue to use word processing translation and local contact people to provide LEP persons access to County programs and material. Also, telephone interpreters are available for approximately \$3.00 to \$5.00 per minute. And 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.

Pulaski 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, 95% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (4.9%). Of those whose primary spoken language is Spanish, approximately 1.4% 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 .15% of the service area population.

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

1. Having Census Bureau Language Identification Flashcards available at Pulaski Transit System Meetings. This will assist Pulaski 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 Pulaski 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.

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

1. Consult with transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.

2. Provide Language Identification Flashcards onboard transit vehicles and in the Pulaski Transit System offices.
3. Include statements clarifying that being bilingual is encouraged on bus driver recruitment materials.
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 clients; (2) identifying existing staff training opportunities; and (3) providing periodic re-training for staff dealing with LEP individual needs.

The following information will be provided to staff members, such as transit drivers, customer service representatives, or other pertinent staff as identified:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

**d. Element 4: Providing Note to LEP Persons**

Pulaski 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 Pulaski Transit System office lobby, on buses, and 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 Pulaski Transit System's financial resources are sufficient to fund language assistance resources needed

#### **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.

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

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. Pulaski 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:**

### **Pulaski Transit System Service Area**

	County	
Total	11,000	
Speak only English	10,433	95
Spanish or Spanish Creole	541	4.9
Speak English "very well"	389	3.5
Speak English less than "very well"	152	1.4
French (incl. Patois, Cajun)		
Speak English "very well"		
Speak English less than "very well"		
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		
Speak English "very well"		
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	5	.0
Speak English "very well"	5	.0
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"		

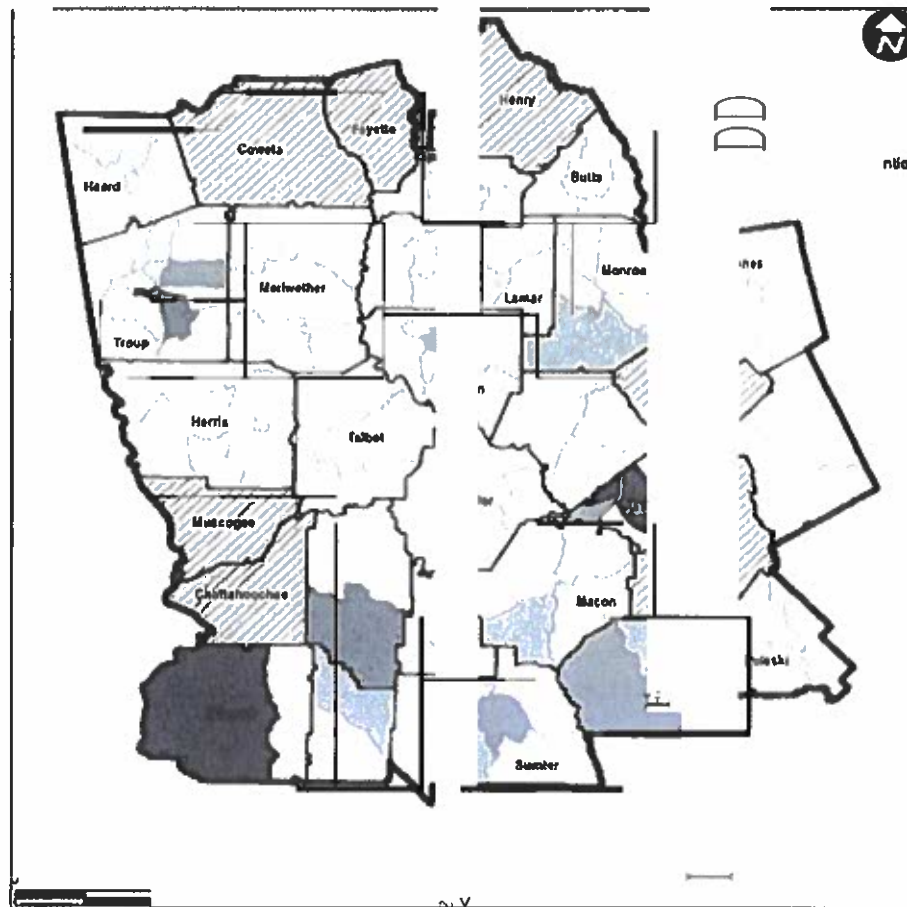
Speak English less than "very well"		
Other Slavic Languages		
Speak English "very well"		
Speak English less than "very well"		
Armenian		
Speak English "very well"		
Speak English less than "very well"		
Persian		
Speak English "very well"		
Speak English less than "very well"		
Gujarati		
Speak English "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		
Speak English "very well"		
Speak English less than "very well"		
Chinese	17	.15
Speak English "very well"		
Speak English less than "very well"	17	.15
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		

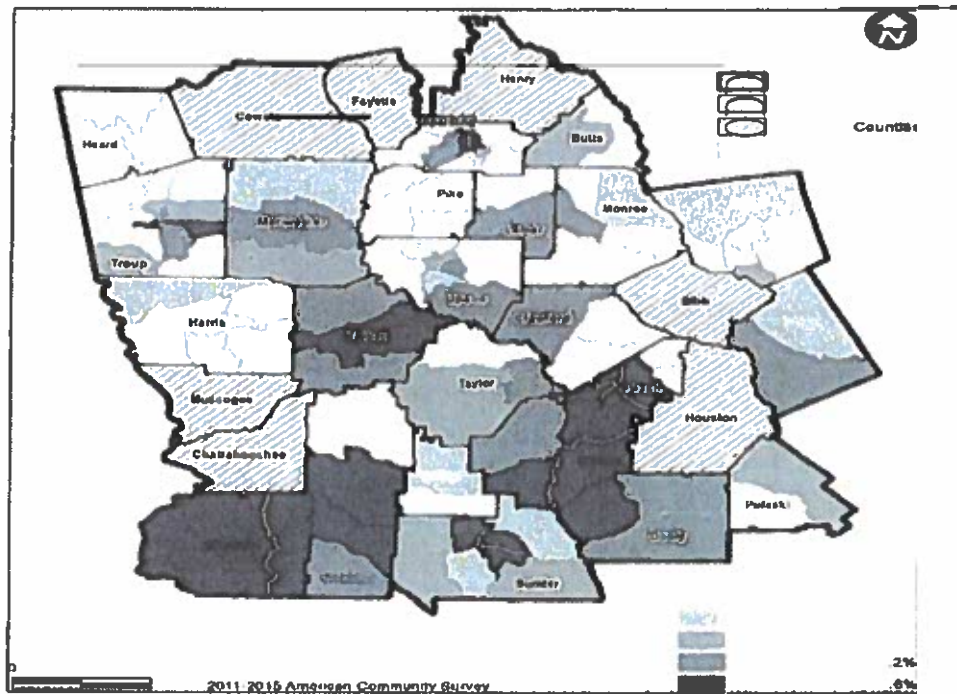


Language		
Speak English "very well"		
Speak English less than "very well"		
Laotian		
Speak English "very well"		
Speak English less than "very well"		
Vietnamese		
Speak English "very well"		
Speak English less than "very well"		
Other Asian languages		
Speak English "very well"		
Speak English less 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"		

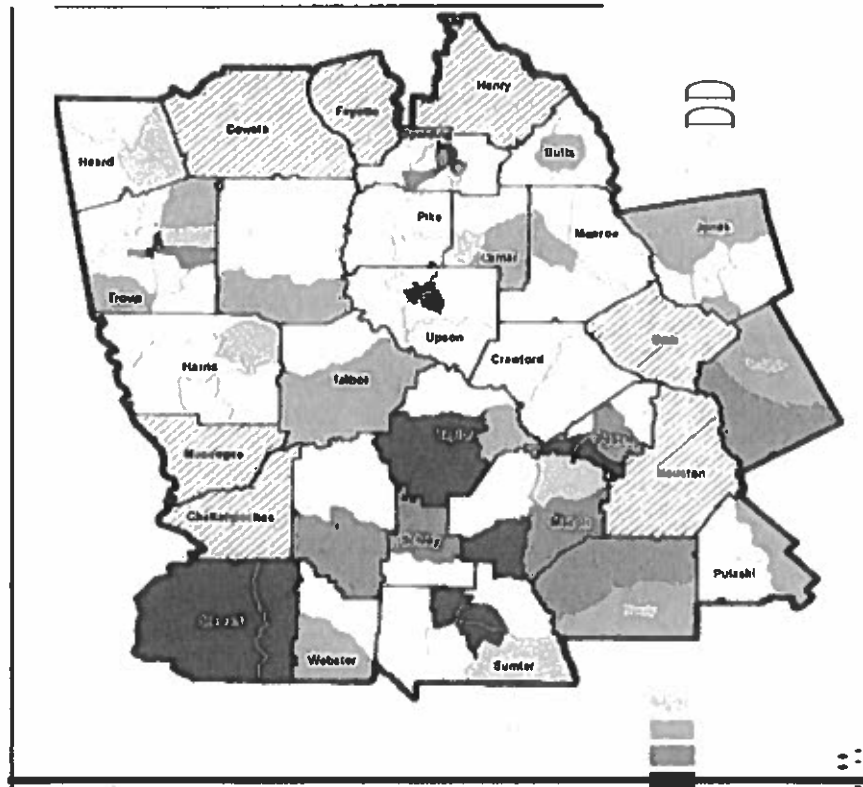
# Appendix I

## Demographic Maps





SELECTION  
TRANSITATION  
PROGRAM  
PULASKI COUNTY  
JULY 2001



# **Appendix**

## **Title VI Equity Analysis**

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