

**Adopted 08/17/2021**  
**Baldwin County Transit**



**Title VI Plan**







Table of Contents

**1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan..... 1-1**

**2.0 Introduction & Description of Services ..... 2-1**

    2.1 First Time Applicant Requirements ..... 2-2

    2.2 Annual Certifications and Assurances..... 2-2

    2.3 Title VI Plan Concurrence and Adoption..... 2-2

**3.0 Title VI Notice to the Public ..... 3-1**

    3.1 Notice to Public..... 3-1

    3.2 Notice Posting Locations..... 3-1

**4.0 Title VI Procedures and Compliance ..... 4-2**

    4.1 Complaint Procedure ..... 4-2

    4.2 Complaint Form ..... 4-2

    4.3 Record Retention and Reporting Policy..... 4-2

    4.4 Sub-recipient Assistance and Monitoring..... 4-3

    4.5 Contractors and Subcontractors..... 4-3

**5.0 Title VI Investigations, Complaints, and Lawsuits ..... 5-5**

**6.0 Public Participation Plan ..... 6-6**

**7.0 Language Assistance Plan ..... 7-7**

**8.0 Transit Planning and Advisory Bodies..... 8-8**

**9.0 Title VI Equity Analysis..... 9-8**

**10.0 System-Wide Service Standards and Service Policies ..... 10-9**

**11.0 Appendices..... 11-1**

APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

APPENDIX B CURRENT SYSTEM DESCRIPTION

APPENDIX C TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER

APPENDIX D TITLE VI NOTICE TO PUBLIC

APPENDIX E TITLE VI COMPLAINT FORM

APPENDIX F PUBLIC PARTICIPATION PLAN

APPENDIX G LANGUAGE ASSISTANCE PLAN

APPENDIX H OPERATING AREA LANGUAGE DATA: BALDWIN COUNTY TRANSIT SERVICE AREA

APPENDIX I DEMOGRAPHIC MAPS

APPENDIX J TITLE VI EQUITY ANALYSIS

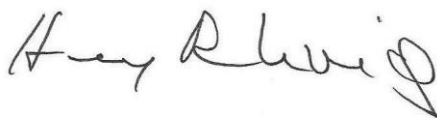
## 1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

Baldwin County Transit assures the Georgia Department of Transportation that no person shall on the basis of race, color, and 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.

Baldwin County Transit 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 Baldwin County Transit.
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: Henry Craig, Chairman

Date: 08/17/2021

## 2.0 Introduction & Description of Services

Baldwin County Transit 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.

Baldwin County Transit is a sub-recipient of FTA funds and provides service in Baldwin County, GA. A description of the current Baldwin County Transit system is included in Appendix B.

### Title VI Liaison

Tesha Dixon

Employed by Baldwin County

478-445-4791

1601 N. Columbia St, Milledgeville, GA 31061

Baldwin County Transit 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, color, 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

Baldwin County Transit is not a first-time applicant for FTA/GDOT funding. During the previous three years, FTA did complete a Title VI compliance review of Baldwin County Transit. Baldwin County Transit 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.

Baldwin County Transit 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 10/25/2021. The Plan was approved and adopted by Baldwin County Commissioners during a meeting held on 08/17/21. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

## 3.0 Title VI Notice to the Public

### 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

The notice is included in Appendix D of this Plan. The notice will 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 Baldwin County Transit 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 Baldwin County Transit's office including the reception area, meeting rooms, buses and on the Baldwin County Transit website at <https://www.baldwincountyga.com/pt/page/public-transportation>.

A version of this notice is included in Appendix D of this Plan.



## 4.0 Title VI Procedures and Compliance

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

Once the complaint is received, Baldwin County Transit 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.

Baldwin County Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Baldwin County Transit 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, Baldwin County Transit 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 Baldwin County Transit's website <http://www.baldwincountyga.com/dept-directory/public-transportation/>

### 4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E and on Baldwin County Transit's website <http://www.baldwincountyga.com/dept-directory/public-transportation/>

### 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. Baldwin County Transit 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

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

#### 4.5 Sub recipients and Subcontractors

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

## 5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Baldwin County Transit 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 Baldwin County Transit 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 FTA.

Baldwin County Transit 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

The Public Participation Plan (PPP) for Baldwin County Transit 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 Baldwin County Transit. 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 Baldwin County Transit 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

Baldwin County Transit 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 Baldwin County Transit recent, current, and planned outreach activities.

- Website
- Facebook Posts
- Promotional Transit Flyers
- Board of Commissioner Meetings
- Press Releases

## 7.0 Language Assistance Plan

Baldwin County Transit operates a transit system within Baldwin County, Ga. The Language Assistance Plan (LAP) has been prepared to address Baldwin County Transit'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 Baldwin County Transit service area there are 1% who describe themselves as not able to communicate in English very well (Source: US Census, 2019 American Community Survey). Baldwin County Transit 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. Baldwin County Transit 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

Baldwin County Transit does not have a transit-related committee or board, therefore this requirement does not apply.

## 9.0 Title VI Equity Analysis

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, Baldwin County Transit will ensure the following:

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

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

## 10.0 System-Wide Service Standards and Service Policies

Baldwin County Transit is not a fixed route service provider.



## 11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: Baldwin County Transit SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

# Appendix A

## FTA Circular 4702.1B Reporting Requirements for Transit Providers

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

### **General Requirements**

*All recipients must submit:*

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

### **Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

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

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

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

# Appendix B

## Current System Description

### Current System Description

1. Baldwin County Transit current and long-term focus is 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 Baldwin county residents.
2. Baldwin County Transit is a government organization. Our Administrator is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners. Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. We currently have 3 part time drivers and one full time Transit employee and 2 administrative employees.
3. Baldwin County Transit is a government authority.
4. Baldwin County Transit's administrator 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 drivers are required to take a driving course every year. The Transportation Services Manager is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Administrator's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Maintenance on all agency vehicles is provided by Automotive Rentals, Inc. 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 312 Allen Memorial Drive, Milledgeville, GA 31061 and are maintained by the Administrator.
6. Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles.
7. Transportation services provided through our program are available to Baldwin County Citizens. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Two of our vehicles are equipped for wheelchair service.

# Appendix C

## **Title VI Plan Adoption 08/17/2021 Meeting Minutes and GDOT Concurrence Letter**



**Baldwin County Board of Commissioners**

1601 N. COLUMBIA STREET, SUITE 230  
MILLEDGEVILLE, GEORGIA 31061-3365  
TELEPHONE: (478) 445-4791  
FACSIMILE: (478) 445-6320  
www.baldwincountyga.com

County Manager  
CARLOS F. TOBAR

County Attorney  
DAVID McREE

Chair  
HENRY R. CRAIG, DISTRICT 4

Vice Chair  
JOHN H. WESTMORELAND, DISTRICT 5

Commissioners  
EMILY C. DAVIS, DISTRICT 1  
KENDRICK B. BUTTS, DISTRICT 2  
SAMMY HALL, DISTRICT 3

CERTIFICATION

I, Cynthia K. Cunningham, County Clerk, do hereby certify that the attached document is a true and correct copy of an excerpt from the minutes of the Baldwin County Board of Commissioners meeting held August 17, 2021.

This 23 day of August, 2021.

*Cynthia K. Cunningham*  
Cynthia K. Cunningham  
County Clerk  




EXCERPT FROM THE AUGUST 17, 2021 BOARD OF COMMISSIONERS MEETING

TITLE VI PLAN FOR BALDWIN COUNTY TRANSIT

Finance Director Jill Adams presented the Title VI Plan for the Boards consideration. She stated the Federal Transportation Authority requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to GDOT for compliance. She discussed the Title VI Nondiscrimination Policy Statement and Management Commitment to the Title VI Plan which states that the Baldwin County Transit Program assures the Georgia Department of Transportation that no person shall on the basis of race, color, and national origin, be excluded from participation in, denied benefits of, or otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency. Ms. Adams stated that 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, and this requirement shall be fulfilled when the applicant / recipient submits its annual certifications and assurances.

Vice Chairman John Westmoreland made a motion to approve the Title VI Nondiscrimination Plan as presented. Commissioner Kendrick Butts seconded the motion and it passed unanimously.



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

October 25, 2021

Carlos Tobar  
Baldwin County  
1601 N. Columbia Street Suite  
230 Milledgeville, Georgia 31061

Dear Mr. Tobar,

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](mailto:afinch@dot.ga.gov) or (470) 432-1751.

Sincerely,

**Patricia  
Smith**

Patricia Smith  
Transit Program Manager  
Division of Intermodal

Digitally signed by  
Patricia Smith  
Date: 2021.10.27  
16:58:38 -04'00'

# Appendix D

## Title VI Sample Notice to Public

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

**Baldwin County Transit**

- Baldwin County Transit 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 Baldwin County Transit.
- For more information on Baldwin County Transit civil rights program, and the procedures to file a complaint, contact 478-445-4791 or email [mking@baldwincountyga.com](mailto:mking@baldwincountyga.com); or visit our government office at 1601 N. Columbia Street, Milledgeville, Ga 31061. For more information, visit <http://www.baldwincountyga.com/>
- If information is needed in another language, contact 478-445-4791
- 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

# Baldwin County

## Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		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 _____				
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

<b>Section V</b>	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
<b>Section VI</b>	
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:

Tesha Dixon, Human Resources  
1601 N. Columbia St, Suite 230  
Milledgeville, Ga 31061

# Appendix F

## Public Participation Plan (PPP)



## Introduction

The Public Participation Plan (PPP) for Baldwin County Transit 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 Baldwin County Transit. 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 Baldwin County Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Baldwin County Transit 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 Baldwin County Transit and its operations. The goals for this PPP include:

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

Baldwin County Transit will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Baldwin County Transit website ([www.baldwincountyga.com](http://www.baldwincountyga.com)) and all feedback on the site will be recorded and passed on to Baldwin County Transit management. The public will also be able to call the Baldwin County Transit office at 478-445-4421 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Baldwin County Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Baldwin County Transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- 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 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.

# Appendix G

## Language Assistance Plan (LAP)

## I. Introduction

Baldwin County Transit operates a transit system within Baldwin County, GA. The Language Assistance Plan (LAP) has been prepared to address Baldwin County Transit’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 Baldwin County Transit service area there are 1% who describe themselves as not able to communicate in English “very well” (Source: US Census, 2019 American Community Survey). Baldwin County Transit 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. Baldwin County Transit 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 Baldwin County Transit be able to communicate effectively with all of its riders. When Baldwin County Transit 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. Baldwin County Transit 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 Baldwin County Transit 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 Baldwin County Transit 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 Baldwin County Transit 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 Baldwin County Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Baldwin County Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Baldwin County Transit to the LEP population.
4. The resources available to Baldwin County Transit and overall costs to provide LEP assistance

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

Of the 42,895 residents in the Baldwin County Transit service area 537 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Baldwin County Transit services area. (US Census, 2019; from

<https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&g=0500000U S13009&tid=ACSST5Y2019.S1601>.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Baldwin County Transit service area (US Census, 2019; from

<https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&g=0500000U S13009&tid=ACSST5Y2019.S1601>.

**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.

Baldwin County Transit 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 and requests for translated documents. Phone inquiries indicated that Baldwin County Transit 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 20 years, Baldwin County Transit has had 0 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.

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

Baldwin County Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: availability of documents to be translated, and a Spanish-speaking county employee. Baldwin County Transit provides a reasonable degree of services for LEP populations in its service area.

### **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.

Baldwin County Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 95.8% of the service area population speaks English only. (US Census 2019) The largest non-English spoken language in the service area is Spanish. Of those who primary spoken language is

Spanish approximately 1% identify themselves as speaking less than “very well” (US Census, 2019). Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 0% of the service area population (US Census 2019).

Baldwin County Transit may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will notify management 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.

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

1. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
2. When an interpreter is needed in person or on the telephone, staff will contact Baldwin County Spanish-speaking staff.

Baldwin County Transit System will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

#### **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 Spanish-speaking county staff that can provide translation services.

In the case of Baldwin County Transit, 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. Contact information of Spanish-speaking county employees.
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

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

Baldwin County Transit will make Title VI information available in English upon request. Key documents are written in English. Notices are also posted in Baldwin County Transit office lobby, and on buses. 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 Baldwin County Transit financial resources are sufficient to fund language assistance resources needed

Baldwin County Transit 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. Baldwin County Transit is open to suggestions from all sources, including customers, Baldwin County Transit 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.



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

## Appendix H

# Operating Area Language Data: Baldwin County Transit Service Area

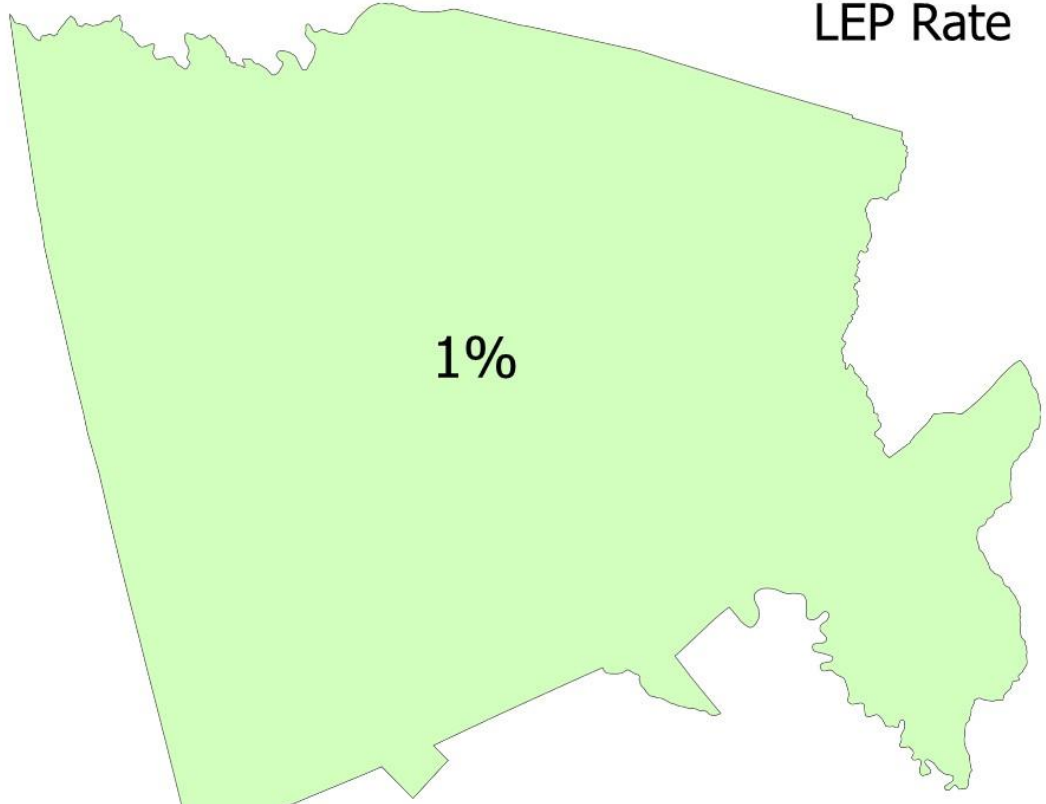


# Appendix I

## Demographic Maps



# Baldwin County LEP Rate

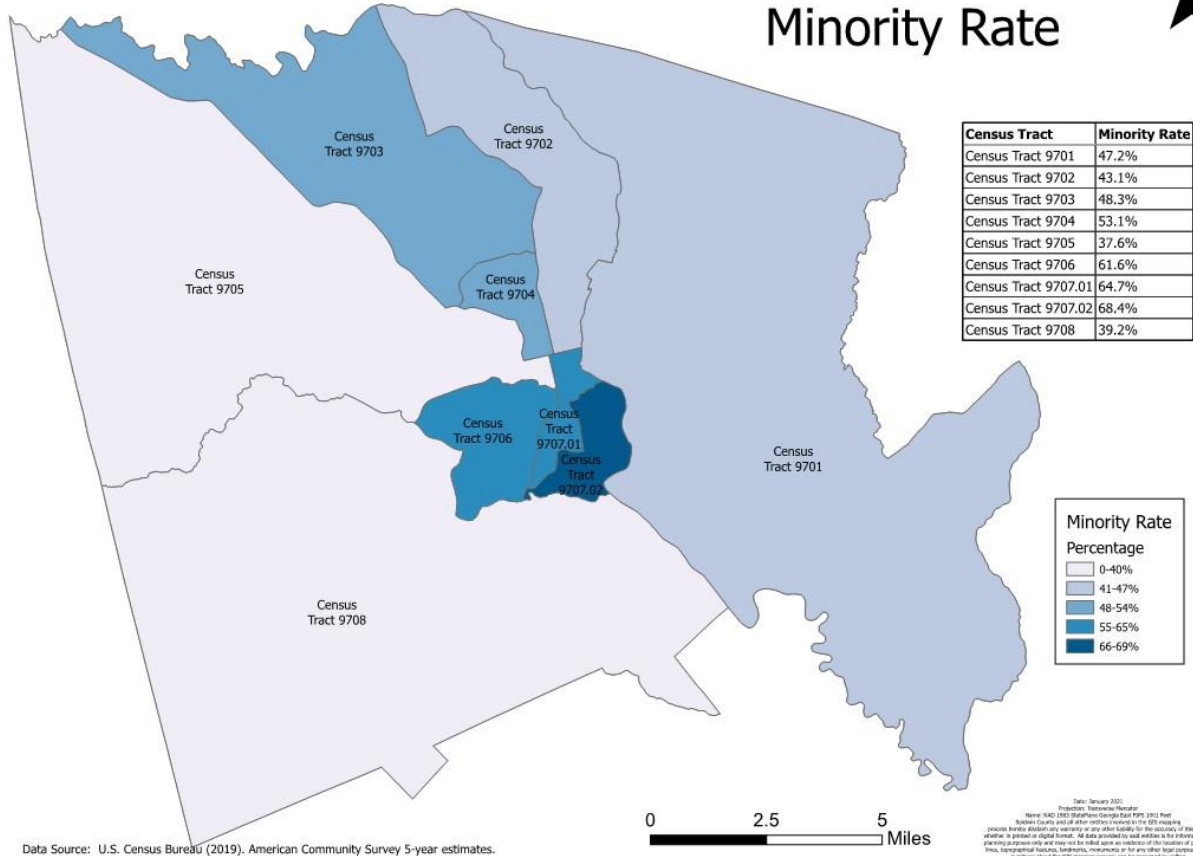


Data Source: U.S. Census Bureau (2019). American Community Survey 5-year estimates.

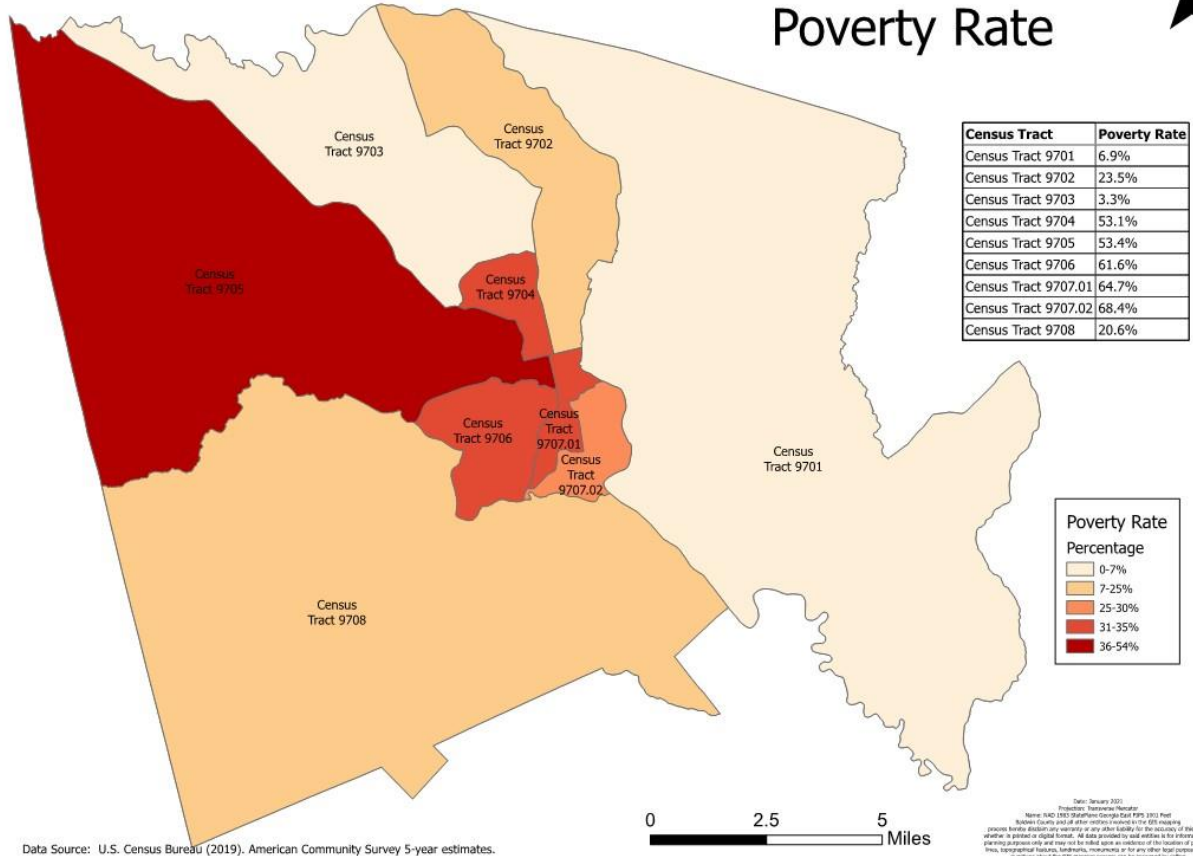


Date: January 2022  
Project: Transportation Blueprint  
Map: Baldwin County LEP Rate  
Baldwin County, and all other entities involved in the GIS mapping process hereby disclaim any warranty or any other liability for the accuracy or use of this data, whether in printed or digital format. All data provided by and/or derived from the information / planning processes only and are not to be used for any other purpose. Any questions about this GIS mapping project can be answered by calling Baldwin County GIS at 910-712-1235.

# Baldwin County Minority Rate



# Baldwin County Poverty Rate



**Appendix J**  
**Title VI Equity Analysis**



Baldwin County Transit has not performed Title VI Equity Analysis.