

BROOKS COUNTY TRANSIT SYSTEM



Title VI Plan

Date Adopted: Month/Day/Year


Preface


This template has been developed by the Georgia Department of Transportation (GDOT) Transit division in order to assist transit agencies with the development of their Title VI Plan. Although each agency is different in size, organization structure, operations, etc., minimum Title VI compliance requirements are common to all. This template document is intended to assist smaller transit agencies that often do not have adequate resources to develop a Title VI Plan in accordance with the minimum requirements of Section 49 Code of Federal Regulations, Part 21 and Federal Transit Administration (FTA) Circular 4702.1B. It should be noted that this template covers the Title VI requirements for sub-recipient transit providers that operate less than 50 vehicles in peak service and are located in urbanized areas (UZA) of less than 200,000 population and rural transit providers.


While the development, adoption, and implementation of a Title VI Plan that complies, at a minimum, with the requirements set forth by FTA Circular 4702.1B is mandatory, the agencies have the prerogative to either utilize this template or enhance their existing Title VI Plan with the information contained in this document. If an agency decides to utilize this template, they will have to customize this document to fit their agency ensuring compliance with FTA Circular 4702.1B, adopt the document, and implement and comply with the Title VI Plan.

It is important to note that the Department is not requiring transit agencies to adopt this template. Transit agencies must, however, adopt a Title VI Plan which addresses all of the requirements of FTA Circular 4702.1B which apply to their agency. The intent of the Department was to develop a document which addresses the provisions of the circular and provide it to local transit agencies as a means of helping them reduce their administrative burden in preparing or updating their Title VI Plans. We believe this document will be invaluable to you in this regard. In developing this document, it was understood that some transit agencies may elect to adopt the template document in whole with little customization. This decision is up to the local transit agency. It must be understood, however, that future compliance reviews will examine your policies and observed practices to ensure that they are consistent with the Title VI Plan you have adopted, and also compliant with FTA Circular 4702.1B.

To use this template, open the electronic file and save the file with an appropriate name (e.g. "Your Transit System Bus System Title VI Plan.doc"). You will quickly note that the Template Document has been color coded to help you distinguish between the actual requirements of FTA Circular 4702.1B, and optional language we have provided that might assist you in developing your plan, or elaborating on how your agency is addressing the requirements of FTA Circular 4702.1B.

 Text Any text highlighted in yellow color should be replaced with your agency's information.

 Text Any text highlighted in blue color are instructions for completion of the template. Please delete all blue highlighted text prior to completion of the Plan.

 Text appearing within the blue shaded boxes is informational only and may provide instructions or other information that will help you in customizing your Title VI Plan.

Text Any text appearing in green color represents optional or suggested language that may assist you in explaining or elaborating on how you are meeting the intent of the requirement.



Text appearing within the bordered boxes as well as the black text found within the section descriptions which follow, represent the actual requirements as stated in FTA Circular 4702.1B, or provides information directly related to the requirements.

Certain FTA Circular 4702.1B requirements are very prescriptive and the requirements are defined in great detail. Under these circumstances, it would be redundant to explain the requirements twice (once in the bordered box and then restate again within the general text that would follow). When such circumstances occur, it will be noted within the bordered box and the general text will be deferred to in summarizing the requirement.

Remember, in the context of FTA Circular 4702.1B, some requirements are not always prescriptive and detailed. Some portions of FTA Circular 4702.1B simply obligate the agency to define or develop a policy or procedure to explain how the agency will meet the intent of the requirement. The language the Department has developed in the **green colored text** is optional or example language crafted to assist you in these instances. *You are not required to use it.* Whether you elect to use the optional **green text** is entirely up to you, but please ensure that any green text utilized applies precisely to your agency. Regardless, your policy or procedure must comply with the requirements set forth by FTA Circular 4702.1B. Also, note that this Template is geared towards satisfying the requirements of FTA Circular 4702.1B only. You may have to incorporate additional policies and procedures to meet the requirements of other regulatory agencies, as appropriate. You can also customize the Appendices as needed to supplement the Title VI Plan. The document is provided in a format that is easily editable by the Agencies, a text formatting palette has been provided in the Appendix of the document specifying font type, text size, etc.

This template was created by the Florida Department of Transportation, modified and adopted for use by the Georgia Department of Transportation.

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

Title VI Plan Activity Log
(Continued)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

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

Brooks County 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, 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.

Brooks County 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 Brooks County 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: _____

Justin DeVane, County Administrator, Brooks County Transit System, December ____, 2014

2.0 Introduction & Description of Services

The Brooks County Transit System 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.

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

Title VI Liaison

Justin DeVane, Administrator
Brooks County Transit System
(229) 263-5561
610 South Highland Road
Quitman, GA 31643

Alternate Title VI Contact

Patricia A. Williams, County Clerk
Brooks County Transit System
(229) 263-5561
610 South Highland Road
Quitman, GA 31643

Brooks County Transit System 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

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

Current and Pending FTA Funding

1. Agreement for Transit Operating Assistance between Department of Transportation, State of Georgia, and Brooks County Transit System, August 7, 2014, \$127,935.00, Project ID Number: T005104, Current
2. Agreement for Capitol Improvement Assistance between Department of Transportation, State of Georgia, and Brooks County Transit System, 2014, \$31,510.40, Project ID Number: T005230, Pending

Current and Pending GDOT Funding

1. Agreement for Capital Improvement Assistance between Department of Transportation, State of Georgia, and Brooks County Transit System, , \$3,938.80, Project ID Number: T005230, Pending
2. Agreement for Capital Improvement Assistance between Department of Transportation, State of Georgia, and Brooks County Transit System, Brooks County Transit System portion \$3,938.80, Project ID Number: T005230, Pending

Current and Pending Federal Funding (non-FTA)

1. Community Development Block Grant, September 28, 2012, \$482,312.00, Award No.: 12p-y-014-1-5490, Grant Period: September 28, 2012 to September 28, 2014
2. Staffing for Adequate Fire and Emergency Response Grant (SAFER), April 3, 2014, Agreement No.: EMW-2013-FH-00384, \$158,496.00, Current
3. Assistance to Firefighters (AFG), May 24, 2013 to May 23, 2014, \$265,145.00

Current and Pending State Funding (non-GDOT)

N/A

During the previous three years, Georgia Department of Transportation did not complete a Title VI compliance review of Brooks County Transit System Transit. Brooks County Transit System 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.

Brooks County Transit System will remain in compliance with this requirement by annual submission of certifications and assurances as required by Georgia Department of Transportation.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on _____. The Plan was approved and adopted by Brooks County Board of Commissioners during a meeting held on December 15, 2014. 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

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Brooks County 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 Brooks County office(s) including the reception desk and meeting rooms. Currently, Brooks County does not have a website; but is in the process of creating one. Additionally, Brooks County Transit System will post the notice 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

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

Once the complaint is received, Brooks County Transit System 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.

Brooks County Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Brooks 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, Brooks 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.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E.

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. Brooks County 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

Brooks County Transit System does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Brooks County Transit System utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Brooks 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

Brooks County annually signs/renews a contract with a Third Party Operator (TPO), MIDS, Inc. to operate and provide services of Brooks County Transit to the residents of the community. Brooks County 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. Brooks County 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, Brooks County 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 Brooks County 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, Brooks County 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. Brooks County 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 Brooks County 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 Brooks County Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Brooks County 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 Brooks County Transit System.

5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Brooks County 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 Brooks County 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 Georgia Department of Transportation.

Brooks County 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

The Public Participation Plan (PPP) for Brooks County 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 Brooks County 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 Brooks County 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

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

The Commissioners make themselves easily available to their constituents, and the County Staff is available to the citizens of Brooks County during normal business hours. The County Administrator has received numerous calls from potential users of the public transit system.

7.0 Language Assistance Plan

Brooks County Transit System operates a transit system within the Brooks County service area. The Language Assistance Plan (LAP) has been prepared to address Brooks County 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 Brooks County Transit System service area there are 510 residents or 3.5% who describe themselves as not able to communicate in English very well (Source: US Census). Brooks County Transit does not have a history of LEP individuals who could not use the system. It is recommended that if needed Brooks County utilize the website of the Southern Georgia Regional Commission where a Google Translator is available for potential riders to learn more about the system. Brooks County 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. Brooks County 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

Brooks County Transit System 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, Brooks County Transit System will ensure the following:

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

10.0 System-Wide Service Standards and Service Policies

Brooks County Transit System is not a fixed route service provider.

FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

Brooks County Transit System has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Appendix B

Current System Description

Current System Description

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

Brooks County Transit System is open to all residents. Many of the current riders are seniors who have some personal mobility issues. Brooks County Transit System is operated in an efficient and effective manner by the County and Third Party Operator, MIDS, Inc.

2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

Brooks County Transit System is a non-profit organization. The Brooks County Transit System is managed and operated by a third party contractor, MIDS, Inc. MIDS is made up of four (4) full-time drivers. The Director of Operations is responsible for all of the day-to-day operations of Brooks County's Transit System. MIDS, Inc. operates 10 hours per day, 5 days per week Monday thru Friday from 7:30 a.m. to 5:00 p.m. MIDS, Inc. employ and supervise drivers, dispatchers, etc., market the system to potential riders, provide liability, Workers Compensation and other insurance products as specified. Third Party Operator, MIDS, Inc., also provide fuel, maintenance, cleaning and repair of vehicles, comply with Drug and Alcohol Testing Policy, implement service expansions or improvements as agreed by TPO and Brooks County, obtain POS contracts which recover the fully allocated costs; and permit GDOT and County to inspect service, financial and data records. The contract stipulates that services to be provided are "curb-to-curb, shared ride, demand responsive transportation for residents of Brooks County....Monday thru Friday from 7:30 a.m. to 5:30 p.m."

A demand responsive service is one where a rider requests a trip with 24-hour advance notice. The contract details the requirements of dispatchers and drivers in delivering the service to riders, including licensure qualifications and training programs to be implemented by MIDS, Inc.

Brooks County Transit System is safe and secure, utilizing a proven training program for drivers and dispatchers. Brooks County and MIDS, Inc. maintain safety and driver records that provide for a safe and secure environment for the riders. Transportation services are provided in accordance with the Board of Commissioners approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP).

3. Indicate if your agency is a government authority.
Brooks County is a local government authority who contracts with MIDS, Inc. annually to operate and provide transit services to the residents of the community.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?
The Third Party Operator, MIDS, Inc., Director of Operations 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. The Director of Operations is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. TPO also provides liability and other insurance for vehicles and employees. It is the Third Party Operator's responsibility to administer all aspects of the Brooks County transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?
Maintenance on all agency vehicles is provided by TPO. TPO, MIDS, Inc., employs ASE certified technicians with experience in working on commercial passenger vehicles. All vehicles under the Agreement is maintained in safe and good mechanical condition. TPO provides the personnel, parts, equipment and supplies necessary to perform all preventive and repair maintenance to keep vehicles in good working order and maintain the continuity of services. 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 TPO operations base located at 1610 River Street, Valdosta, GA 31601 and Brooks County. All records are maintained and retained for a minimum of four (4) years.
6. Number of current transportation related employees
All employees; including, full time drivers, part-time drivers, administrators, and support staff; are employed by the TPO, MIDS, Inc.
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. TPO require all drivers to have or be able to obtain a valid Georgia Driver's License; a Class C Georgia Commercial Driver's License (CDL) is required prior to operating a vehicle that will transport more than 15 passengers. All drivers are required to carry a Commercial Driver's License. This allows coverage of all of the larger vehicles and for the opportunity for the other drivers to fill in on service routes with the larger vehicles.

8. A detailed description of service routes and ridership numbers
Transportation services provided through our program are available to customers. Our service incorporates services. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Most of the trips provided are to medical facilities out of the county; therefore, our out of county services are directed to the nearby highway corridors that surround this community for optimum efficiency of trip duration and the most convenient route. Brooks County has four vehicles; two vehicles are equipped for wheelchair service. Brooks Transit make 41 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

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**Brooks County Transit System**

- Brooks 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 Brooks County Transit System.
- For more information on Brooks County Transit System's civil rights program, and the procedures to file a complaint, contact 229-263-5561, **TDD: 711 or 800-255-0056**; email brookscot@windstream.net or visit our administrative office at 610 South Highland Road, Quitman, GA, 31643. .
- If information is needed in another language, go to www.sgrc.us , Google Translator is available
- 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

Brooks County Transit System

Title VI Complaint Form

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> 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.			

Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<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:	
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:

Justin DeVane, Administrator
 Brooks County Transit System Title VI Liaison
 P.O. Box 272
 Quitman, GA 31643

Appendix F

Public Participation Plan (PPP)

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

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

“Some of those effective practices include:

- a. Scheduling meeting at times and locations that are convenient and accessible for minority and LEP communities.
- b. Employing different meeting sizes and formats.
- c. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- e. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral communication. “

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 Brooks County 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 Brooks County 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 Brooks County 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. Brooks County Transit System also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers,

passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Brooks County Transit System and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Brooks County Transit System will proactively reach out and engage low-income, minority, and LEP populations for the Brooks County Transit System service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Brooks County Transit System will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

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

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

The public will be invited to provide feedback on the Brooks County Transit System. The public will also be able to call the Brooks County Transit System office at 229-247-1800 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Brooks County Transit System management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the "safe harbor" criteria.

Public Hearing

The Brooks County Transit System will conduct public hearings, as appropriate, to discuss any changes to policies or services and solicit public input for consideration prior to final decision is made.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Brooks County Transit System operates a transit system within Brooks County and surrounding area. The Language Assistance Plan (LAP) has been prepared to address Brooks County 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 Brooks County Transit System service area there are 16,243 residents, it is estimated that there is a total of 510 persons, or 3.5% of the total population speaks Spanish, or who describe themselves as not able to communicate in English "very well" (Source: US Census). Brooks County 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. Brooks County Transit System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

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

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

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

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

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Brooks County Transit System staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Brooks County 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 or proportion of LEP persons eligible to be served or likely to be encountered by public transit service.
2. The frequency with which LEP persons come in contact with Brooks County Transit System programs, activities or services.
3. The nature and importance of the transit services provided by Brooks County Transit System to the LEP population.
4. The resources available to Brooks County Transit System 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 16,340 residents in the Brooks County Transit System service area 510 residents describe themselves as speaking English less than "very well". People of Hispanic descent are the primary LEP persons likely to utilize Brooks County Transit System services. For the Brooks County Transit System service area, the American Community Survey of the U.S. Census Bureau estimates that of the persons 5 years old and older in Brooks County, 325 persons are linguistically isolated, the next largest language spoken at home is Spanish in Brooks County. It is estimated there is a total of 510 persons, or 3.5% of the

total population speaks Spanish. This is significantly lower than the national percentage of persons that speak Spanish at home..

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.

Brooks County Transit System has assessed the frequency with which LEP individuals come in contact with the transit system. Brooks County Transit does not have a history of LEP individuals who could not use the system. It is recommended if needed Brooks County utilize the website of the Southern Georgia Regional Commission where a Google Translator is available for potential riders to learn more about the system.

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.

Brooks County Transit is provided as a service to riders in the County to access basic, non-emergency public transit services.

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

Brooks County Transit System assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. The SGRC website at www.sgrc.us/transportation, where a Google Translator can provide for basic information on the service to LEP individuals.

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.

d. 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.

Brooks County 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, 3.5% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish. Of those whose primary spoken language is Spanish approximately 3.5% identify themselves as speaking less than "very well".

Brooks County Transit System 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. Having Census Bureau Language Identification Flashcards available at Brooks County Transit System Meetings. This will assist Brooks County Transit System in identifying language assistance needs for future events and meetings.
3. 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 Brooks County Transit System management to follow-up.
4. 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.

e. 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.

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

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the Brooks County Transit System offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. 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.

Brooks 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.

f. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Brooks County Transit System, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and [other language].

The following training will be provided to Customer Service Representative:

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

g. Element 4: Providing Note to LEP Persons

Brooks County 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 Brooks County Transit System office lobby, on buses, and handouts. 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.

h. 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 Brooks County Transit System's financial resources are sufficient to fund language assistance resources needed

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

III. 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.

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

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Brooks County 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:

Brooks County Transit System Service

Area

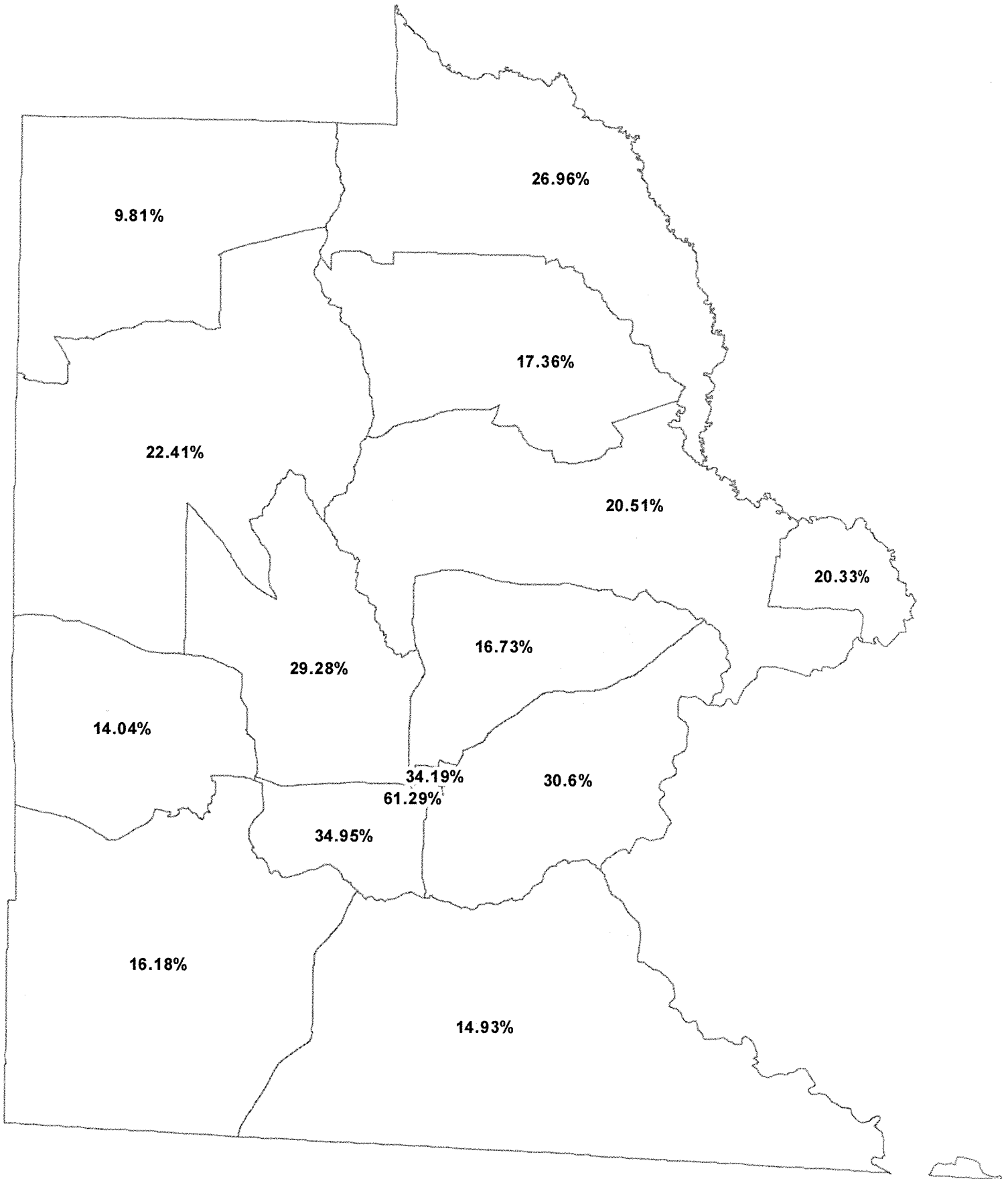
Language	County	Percent of Population
Total	14,892	100
Speak only English	13,876	
Spanish or Spanish Creole	811	3.5
Speak English "very well"	455	
Speak English less than "very well"	356	
French (incl. Patois, Cajun)	80	
Speak English "very well"	53	
Speak English less than "very well"	27	
French Creole	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Italian	7	
Speak English "very well"	7	
Speak English less than "very well"	0	
Portuguese or Portuguese Creole	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
German	45	
Speak English "very well"	33	
Speak English less than "very well"	12	
Yiddish	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other West Germanic languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Scandinavian languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Greek	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Russian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Polish	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Serbo-Croatian	0	
Speak English "very well"	0	

Language	County	Percent of Population
Speak English less than "very well"	0	
Other Slavic Languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Armenian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Persian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Gujarati	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hindi	45	
Speak English "very well"	29	
Speak English less than "very well"	16	
Urdu	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Indic languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Indo-European Languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Chinese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Japanese	16	
Speak English "very well"	16	
Speak English less than "very well"	0	
Korean	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Mon-Khmer, Cambodian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hmong	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Thai	0	

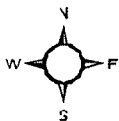
Language	County	Percent of Population
Speak English "very well"	0	
Speak English less than "very well"	0	
Laotian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Vietnamese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Asian languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Tagalog	12	
Speak English "very well"	12	
Speak English less than "very well"	0	
Other Pacific Island languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Navajo	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Native American languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hungarian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Arabic	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hebrew	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
African languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other and unspecified languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	

Appendix I

Demographic Maps

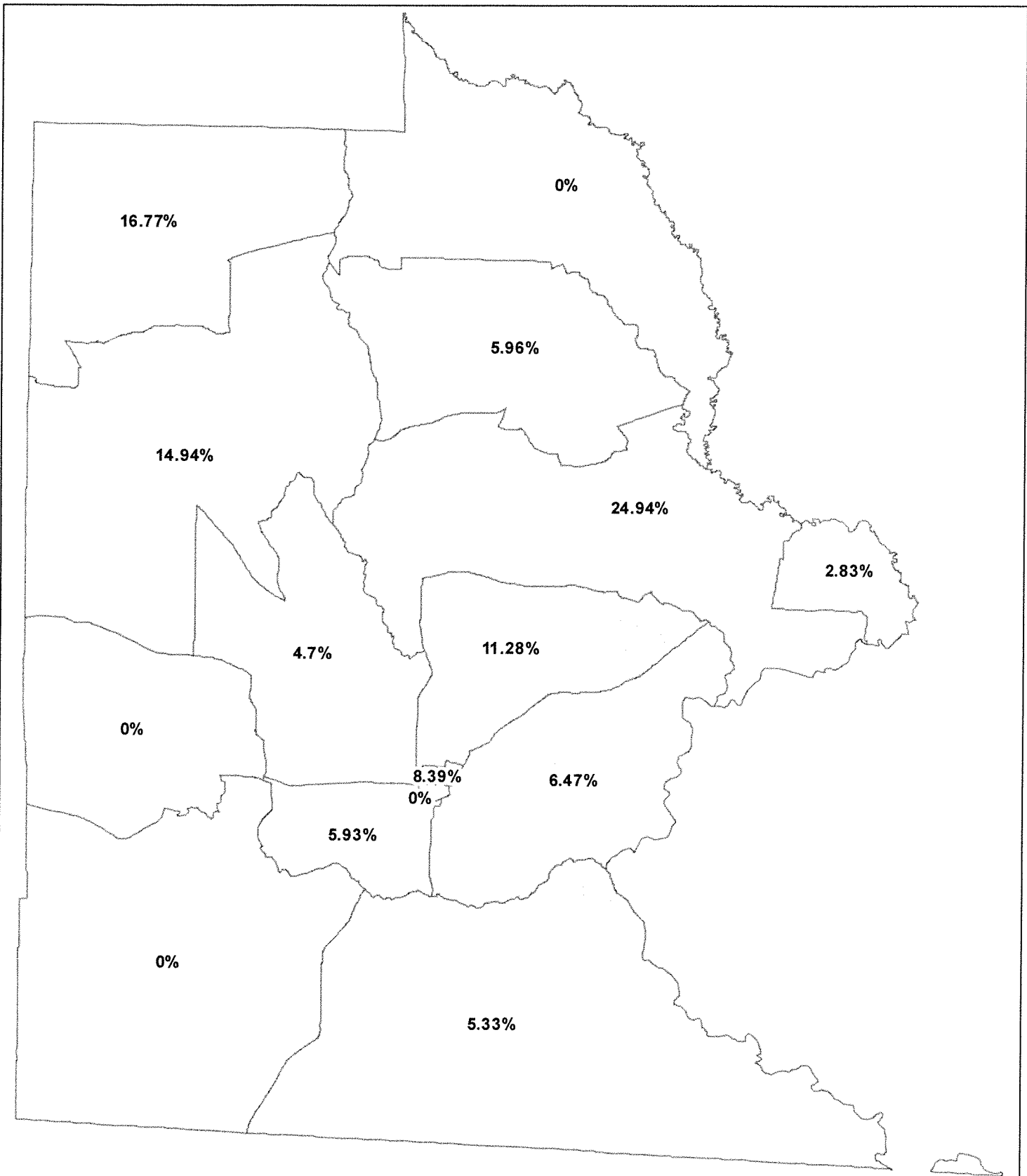


Brooks County Percent of Households Below Poverty Level by Block Groups



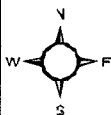
2010 Census Data

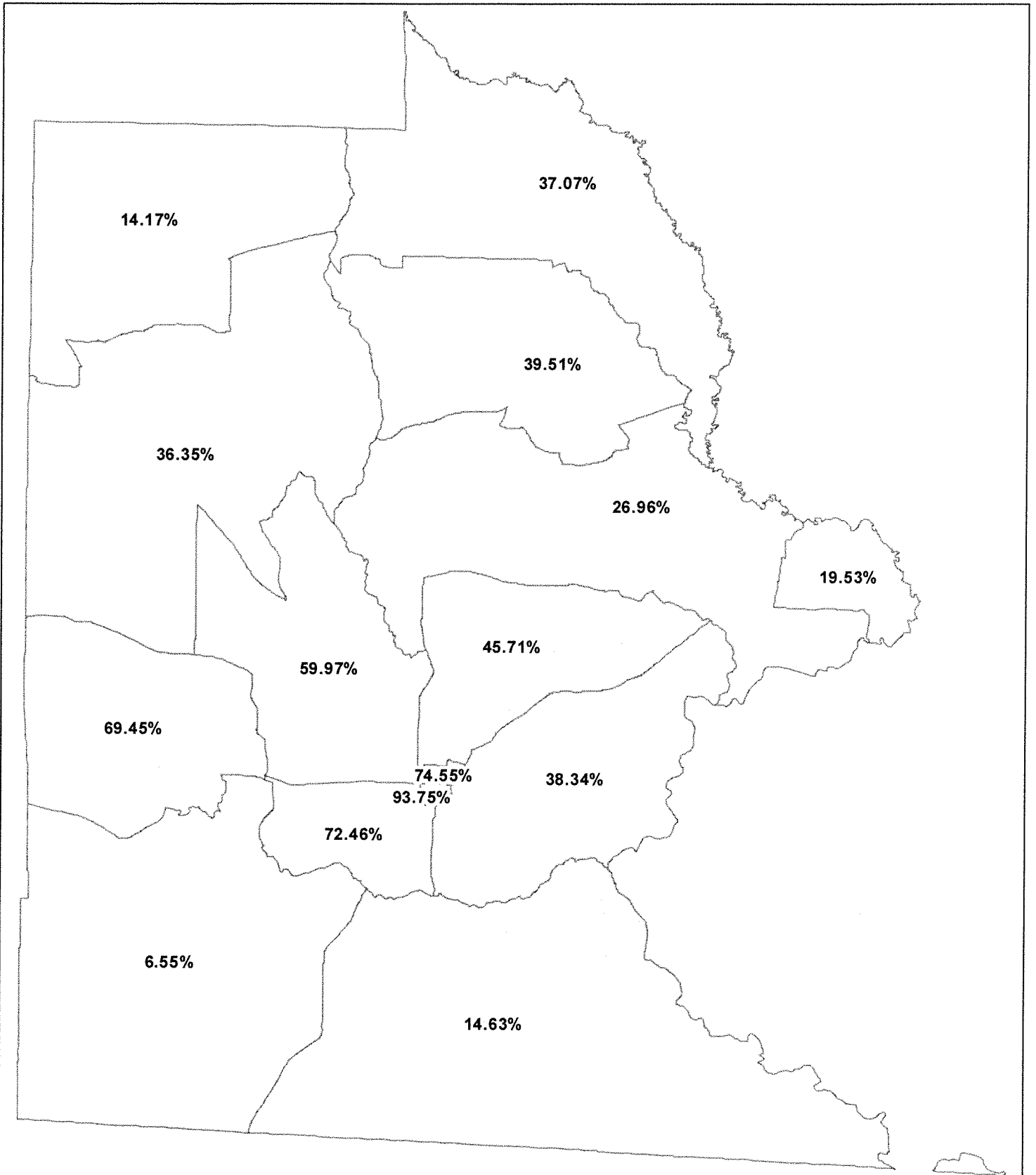




Brooks County
Percent of Households with Limited English Proficiency
by Block Groups

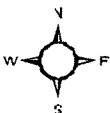
2010 Census Data





Brooks County Percent of Minority Population by Block Groups

2010 Census Data



Instructions to complete Appendix I ;

- 1. You will need ArcGIS software**
- 2. The datasets used within ArcGIS include the 2010 Census Block Group Data and the 2011 American Community Survey (ACS) data by Census Block Group**
- 3. By selecting attributes relating to the percent minority, percent of limited English proficiency, and the percent below poverty from the data sources, join the data to the census block groups and display percentages for each block group within the counties**
- 4. This should be completed for each county in your service area creating a total of 3 maps for each county (showing LEP population, minority population, and population percentage below poverty level)**

Appendix J
Title VI Equity Analysis

Brooks County Transit System has not performed a Title VI Equity Analysis. We do not have any constructed facility or current plans to construct one.