

***Federal Transit Administration
Title VI Program***

Hart County Transit System

November 26, 2024

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The Hart County Transit System Title VI plan includes the following elements:

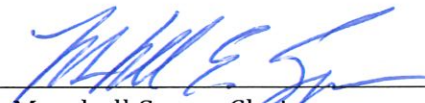
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Section 1: Title VI Plan Approval

Title VI Plan Adopted on: November 26, 2024

Adopted by: Hart County Board of Commissioners

Signature(s): 
Marshall Sayer, Chairman

Approval:

Section 2: Title VI Policy Statement

Policy Statement

Hart County Transit System, operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Georgia Department of Transportation (GDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and GDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. Hart 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.

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Hart County Transit System

- Hart 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 the Hart County Transit System.
- For more information on Hart County Transit System's civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Jean Teasley, Title VI Coordinator
706-376-2024

Email: jconwell@hartcountyga.gov

Or visit our administrative office at

800 Chandler Street, Hartwell, GA 30643

For more information, visit www.hartcountyga.gov

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
- If information is needed in another language, contact **706-376-2024**
- Si se necesita información en otro idioma, comuníquese con 706-376-2024

The **Hart County Transit System** Notice to the Public is posted in the following locations:

1. All Transit Vehicles
2. Senior Center
3. Website: www.hartcountyga.gov

Section 4: Title VI Complaint Procedure

Any person or persons who believes they have been discriminated against on the basis of race, color, or national origin by Hart County Transit System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with Hart County Transit System no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, Hart County Transit System will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Hart County Transit System has 90 days to investigate the complaint. If more information is needed to resolve the case, the Hart County Transit System may contact the complainant requesting further information. The complainant has 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 10 business days, Hart County Transit System can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) 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 letter of finding (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 it must direct the appeal back to the agency. The complainant has 7 days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). The appeal process information will be included in the letter.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

Jean Teasley, Title VI Coordinator
706-376-2024, (TTY 711)
Email: jconwell@hartcountyga.gov
Or visit our administrative office at
800 Chandler Street, Hartwell, GA 30643

For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

Or

Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **706-376-2024**

*Si necesita información en otro idioma, por favor llame **706-376-2024***

Section 5: Title VI Complaint Form

Hart County Transit System Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-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):

Title VI: ☐ Race ☐ Color ☐ National Origin

Other (specify): _____

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 Civil Rights related complaint with this agency?

Yes

No

Section V

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

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court _____

☐ State Court _____

☐ State Agency _____

☐ Local Agency _____

If marked Yes in Section V, 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:

**Hart County Transit System
Jean Teasley (Title VI Coordinator)
800 Chandler Street
Hartwell, GA 30643
706-376-2024
jconwell@hartcountyga.gov**

Section 6: List of Title VI Investigations, Complaints and Lawsuits

The Hart County Transit System maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- ☒ There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- ☐ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	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.				

Section 7: Public Participation Plan

Hart County Transit System's *Public Involvement Philosophy*

Hart County Transit System welcomes and values public involvement. GDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps Hart County Transit System better understand and reflect the full range of community values and livability standards.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- Hart County Transit System proactively addresses transportation issues.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input and information from the public of program functions,
- Implement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public transportation services.
- Foster internal communication and training to promote public transit process

Goals and Ideas Outcomes

To promote inclusive public participation, Hart County Transit System will employ the following goals and ideas, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for engagement by the public

In addition to these general goals and ideas, Hart County Transit System has also employed these specific strategies or activities:

- Distribute flyers at community government buildings, health related offices and departments, grocery stores
- Use of Social media
- Notices posted on Transit vehicles
- Use of County website promoting Transit affordability

Public Outreach Activities

The public outreach and involvement activities conducted by Hart County Transit System since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Hart County Transit System Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
			County Website	
			Social Media	
			Transit Vehicles	
			Grocery Store	
			County Buildings	

Section 8: Four Factor Analysis and LEP Data

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

Hart County Transit System will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Hart County Transit System

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

Hart County Transit System service area encompasses Hart County. Home to 24,847 people spread over 232 square miles, the service area's population speaks 7 different language groups. However, the overall numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 24,847, 412, or 1.66% of the population

of residents, report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	Hart County, Georgia	
Label	Estimate	Total in Service Area
Total:	24,847	
Speak only English	23,412	94.22%
Speak English and Spanish less than "very well"	208	0.84%
Speak English and French, Haitian or Cajun less than "very well"	0	0.00%
Speak English and German or other West Germanic languages less than "very well"	0	0.00%
Speak English and Russian, Polish or other Slavic languages less than "very well"	0	0.00%
Speak English and other Indo-European languages less than "very well"	12	0.05%
Speak English and Korean less than "very well"	66	0.27%
Speak English and Chinese Mandarin, Cantonese less than "very well"	0	0.00%
Speak English and Vietnamese less than "very well"	105	0.42%
Speak English and Tagalog incl Filipino less than "very well"	16	0.06%
Speak English and other Asian and Pacific Island languages less than "very well"	0	0.00%
Speak English and Arabic less than "very well"	0	0.00%
Speak English and other and unspecified languages less than "very well"	5	0.02%

<https://data.census.gov/cedsci/> Table C16001

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice's Safe Harbor Provision. This provision outlines circumstances that can provide a "safe harbor" for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient's written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The census data above shows all languages that have the lesser of 1,000 people, or 5% of Hart County Transit service area population that speak English "less than very well". The information from the census, out of population of 24,847, only 208, which is .84%, speak English "less than very well". There are no languages that meet the Safe Harbor Threshold.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, no languages meet the Safe Harbor Threshold in our service area. The agency is therefore not designating any vital documents at this time.

Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.

Hart County Transit System has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. Census data indicates the lack of prominent LEP group. Phone inquiries and staff survey feedback indicated that Hart County Transit System dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past ten years, Hart County Transit System has had zero requests for translated documents.

Factor Three: The Importance of the Agency's Service to People's Lives

Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations.

Hart County Transit System's services are accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that Hart County Transit System has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. In the event assistance in a rare language is needed, Hart County Transit System can reach out to free resources, including the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate with LEP citizens.

Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, Hart County Transit System is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Hart County Transit System's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Results: LEP Populations Served

Item #1 – Four Factor Analysis Results: LEP Populations Served
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The census data above shows all languages that have the lesser of 1,000 people, or 5% of Hart County Transit service area population that speak English “less than very well”. The information from the census, out of population of 24,847, only 208, which is .84%, speak English “less than very well”. There are no languages that meet the Safe Harbor Threshold.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
--

The Hart County Transit System has identified, developed, and uses the following:

- a) Dispatch and transit drivers who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services.

- b) The Hart County Transit System has access to local law enforcement, emergency services agencies, social service agencies and the use of Google Translate or other technology-based translation services that are available to assist with LEP responsibilities.
- c) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service
--

In order to ensure that LEP individuals are aware of Hart County Transit System's language assistance measures, Hart County Transit System provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.
- The website will include in English that if assistance or information is needed in another language, please call 706-376-2024.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated
--

Hart County Transit System will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Hart County Transit System service area.

Updates will continue to include 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 local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Hart County Transit System's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Hart County Transit System has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Hart County Transit System's failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons
--

The following training will be provided to Hart County Transit System staff:

- Information on the Hart County Transit System Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 10: Minority Representation Information

Hart County Transit System does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

☒ No, the agency does not have subrecipients.

Section 12: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “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. Has the agency built a facility?

☒ No, the agency has not built a facility.

Section 13: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Hart County Transit System:

☐ is a fixed route transit provider

☒ is **not** a fixed route transit provider