

# Putnam County Transit



## Title VI Plan

*Date Adopted: October 19, 2021*



## Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
12/16/2014	Adoption		Title VI Plan GDOT approval
6/20/2019	Review		Title VI Plan GDOT approval
7/5/2019	Adoption		Title VI Plan GDOT approval
9/30/2021	Review		Title VI Plan GDOT approval
10/19/2021	Adoption		Title VI Plan GDOT approval
11/4/2021	Concurrence		Title VI Plan GDOT approval

### Title VI Plan Activity Log (Continued)

[illegible]

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

*49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].*

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

Putnam County Transit further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Putnam County Transit.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

**THIS ASSURANCE** is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: Billy Webster

Printed Name: Billy Webster

Chairman, Putnam County Board of Commissioners, Date: 10-19-2021

## 2.0 Introduction & Description of Services

Putnam County Transit submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

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

### Title VI Liaison

Dianne Pounds, Transit Director  
Putnam County Board of commissioners  
706-485-6355  
117 Putnam Drive, Suite A, Eatonton, Georgia 31024

### Alternate Title VI Contact

Paul Van Haute, County Manger  
Putnam County Board of Commissioners  
709-485-5826  
117 Putnam Drive, Suite A, Eatonton, Georgia 31024

Putnam County Transit must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

## 2.1 First Time Applicant Requirements

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

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

### Current and Pending GDOT Funding

1.T006374, 7/01/20 to 6/30/21 \$382,562.00; Pending T007174, 7/01/21 to 6/3/22 \$138,650.00 and State \$5,645.55

*FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.*

During the previous three years, Georgia Department of Transportation did complete a Title VI compliance review of Putnam County Transit. Putnam County Transit has not been found to be in noncompliance with any civil rights requirements.

The following is a summary of the compliance review.

- a. Date of the compliance review  
06/20/2019
- b. The purpose or reason for the review  
FTA 5311 Program – Compliance Review
- c. Agency or organization that performed the review  
Georgia Department of Transportation's Division of Intermodal
- d. Summary of the finding and recommendations of the review  
None
- e. Report on the status of the findings and recommendations  
N/A
- f. Current status of the compliance review  
In compliance

## 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.

Putnam County Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

## 2.3 Title VI Plan Concurrence and Adoption

The most recent Title VI Plan received GDOT concurrence on November 4, 2021. The Plan was approved and adopted by Putnam County Board of Commissioners during a meeting held on October 19, 2021. A copy of the meeting minutes and GDOT concurrence letter are on the pages to follow in Appendix C.



### 3.0 Title VI Notice to the Public

#### 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.

#### 3.1 Notice Posting Locations

Notice to Public will be posted at many locations to apprise the public of Putnam County Transit obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Putnam County Transit office(s) including the reception desk and meeting rooms, and on the Putnam County Transit website at <https://www.putnamcountyga.us/transit/page/rights-under-title-vi>.

Additionally, Putnam County Transit will post the notice at stations, stops and on transit vehicles.

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

## 4.0 Title VI Procedures and Compliance

*FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.*

### 4.1 Complaint Procedure

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

Once the complaint is received, Putnam County Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Putnam County Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Putnam County Transit may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Putnam County Transit can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public (<https://www.putnamcountyga.us> ).

### 4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on <http://www.putnamcountyga.us> ).

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

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

### 4.4 Sub-recipient Assistance and Monitoring

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

### 4.5 Sub recipients and Subcontractors

Putnam County Transit is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Putnam County Transit, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

#### Nondiscrimination Clauses

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

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

subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin..

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Putnam County Transit shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Putnam County Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

### E-Verify

As a condition of your agreement with GDOT, vendors and contractors of Putnam County Transit 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 Putnam County Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Putnam County Transit 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 Putnam County Transit.

## 5.0 Title VI Investigations, Complaints, and Lawsuits

*FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.*

In accordance with 49 CFR 21.9(b), Putnam County Transit must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Putnam County Transit in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to [GDOT].

Putnam County Transit has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

**Table 1: Summary of Investigations, Lawsuits, and Complaints**

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	n/a	n/a	n/a	n/a
1.				
2.				
Lawsuits	n/a	n/a	n/a	n/a
1.				
2.				
Complaints	n/a	n/a	n/a	n/a
1.				
2.				



## 6.0 Public Participation Plan

*FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.*

The Public Participation Plan (PPP) for Putnam County Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Putnam County Transit. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Putnam County Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

### Current Outreach Efforts

Putnam County Transit is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Putnam County Transit's recent, current, and planned outreached activities.

- Distribute pamphlets at various businesses
- Spiritual wall calendar given out to the public annual
- Setup informative booths at fair (Dairy Festival)
- Bring a Friend Day for free

## 7.0 Language Assistance Plan

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

Putnam County Transit operates a transit system within Putnam County. The Language Assistance Plan (LAP) has been prepared to address Putnam County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Putnam County service area there are 380 residents or 1.8% who describe themselves as not able to communicate in English very well. Putnam County 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. Putnam County Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

## 8.0 Transit Planning and Advisory Bodies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.*

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

## 9.0 Title VI Equity Analysis

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

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

1. Putnam County Transit will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Putnam County Transit will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, Putnam County Transit will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If Putnam County Transit determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin. Putnam County Transit may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no

alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Putnam County Transit must demonstrate and document how both tests are met. Putnam County Transit will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

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

## 10.0 System-Wide Service Standards and Service Policies

*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.*

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



## 11.0 Appendices

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# **Appendix A**

## **FTA Circular 4702.1B Reporting Requirements for Transit Providers**

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

### **General Requirements**

*All recipients must submit:*

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

### **Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

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

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

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

# **Appendix B**

## **Current System Description**



### Current System Description

1. An overview of the organization including its mission, program goals and objectives.  
Putnam County Transit's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.  
Putnam County Transit is a government agency. Our organization is made up of 4 full-time employees, 1 part-time employee, and 0 volunteers. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to our County Manager. Our BOC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2011 Transit Development Plan (page 201) and 2012 Operations Handbook (page 34). We will continue to operate at previous year (2011) service hours averaging 84 total fleet service hours per day or approximately 25,200 annual service hours (assuming 300 operating days).
3. Indicate if your agency is a government authority.  
Putnam County Transit operates as a government agency.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
Putnam County Transit's manager is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheelchair lifts and securement devices. The Transportation Services Manager is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?  
Maintenance on all agency vehicles is provided by Putnam County Public Work/ Shop. Putnam County Public Work/ Shop employ only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at

our operations base located at 117 Putnam Dr. and are maintained by the Transit Director Dianne Pounds. All records are maintained and retained for a minimum of four (4) years.

6. Number of current transportation related employees

Our transportation department has a total of 5 employees that include: 3 full-time drivers, 1 part-time driver, 1 administrator and 0 support staff.

7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to general public. Our service incorporates medical, nutrition, employment, shopping, training, employment, social and recreation. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 3% of the medical trips we provide 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. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes vans, modified vans, and buses. Three of our vehicles are equipped for wheelchair service. We also have a contract provider that can supplement any services that we are unable to accommodate. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 75 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**

# PUTNAM COUNTY BOARD OF COMMISSIONERS



117 Putnam Drive, Suite A ♦ Eatonton, GA 31024

## Minutes

**Tuesday, October 19, 2021 ♦ 6:30 PM**

**Putnam County Administration Building – Room 203**

The Putnam County Board of Commissioners met on Tuesday, October 19, 2021 at approximately 6:30 PM in the Putnam County Administration Building, 117 Putnam Drive, Room 203, Eatonton, Georgia.

### ***PRESENT***

Chairman Billy Webster  
Commissioner Gary McElhenney  
Commissioner Daniel Brown  
Commissioner Bill Sharp  
Commissioner Jeff Wooten

### ***STAFF PRESENT***

County Attorney Barry Fleming  
County Manager Paul Van Haute  
County Clerk Lynn Butterworth

### **Opening**

1. Welcome - Call to Order

Chairman Webster called the meeting to order at approximately 6:32 p.m.

(Copy of agenda made a part of the minutes on minute book page \_\_\_\_\_.)

2. Approval of Agenda

**Motion to approve the Agenda.**

**Motion made by Commissioner Sharp, Seconded by Commissioner Wooten.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

3. Invocation

Pastor David Wofford, Eatonton First United Methodist Church, gave the invocation.

4. Pledge of Allegiance (staff)

County Manager Van Haute led the Pledge of Allegiance.

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### **Zoning Public Hearing**

5. Request by Rick McAllister, agent for Featherfield LLC, for conditional use on Old Phoenix Road [Map 104, Parcel 002, District 3] (staff-P&D)

Mr. Rick McAllister spoke in support of the request and explained the project. The event center portion of the project needs a conditional use permit. Mrs. Louise Murphy and Mr. Rob Murphy signed up to speak but passed. No one signed in to speak against this item.

Planning and Development staff recommendation was for approval of the proposed conditional use located on Old Phoenix Road, and identified as Map 104, Part of Parcel 002 with the following conditions:

1. This conditional use approval shall be conditioned upon the resurveying and recordation in the Superior Court of Putnam County of an accurate plat within 60 days of approval by the board of commissioners. A copy of the recorded plat shall be filed with the planning and development department director. Failure to file a plat pursuant to this subsection shall have the effect of invalidating the rezoning action as stated in Section 66-165(e)(3) of the Putnam County Code of Ordinances.
2. A 25-foot undisturbed vegetated buffer must be established along Wards Chapel Road and along the property lines that abut Map 104, Parcel 001 and Map 104, Parcel 024.
3. The uses allowed under the conditional use shall be limited to those that conform with a barn style (event venue), open air chapel, parking, a residential dwelling and any other use or accessory use allowed within AG-1.
4. Hours of operation shall not exceed 11:00pm Monday-Thursday and 1:00am on the weekends.
5. Owners shall present a parking plan, prepared by a design professional which shall be approved by the Planning Director and executed prior to the issuance of a business registration.

**Motion to approve the request by Rick McAllister, agent for Featherfield LLC, for conditional use on Old Phoenix Road [Map 104, Parcel 002] subject to the following conditions:**

- 1. This conditional use approval shall be conditioned upon the resurveying and recordation in the Superior Court of Putnam County of an accurate plat within 60 days of approval by the board of commissioners. A copy of the recorded plat shall be filed with the planning and development department director. Failure to file a plat pursuant to this subsection shall have the effect of invalidating the rezoning action as stated in Section 66-165(e)(3) of the Putnam County Code of Ordinances.**
- 2. A 25-foot undisturbed vegetated buffer must be established along Wards Chapel Road and along the property lines that abut Map 104, Parcel 001 and Map 104, Parcel 024.**
- 3. The uses allowed under the conditional use shall be limited to those that conform with a barn style (event venue), open air chapel, parking, a residential dwelling and any other use or accessory use allowed within AG-1.**
- 4. Hours of operation shall not exceed 11:00pm Monday-Thursday and 1:00am on the weekends.**
- 5. Owners shall present a parking plan, prepared by a design professional which shall be approved by the Planning Director and executed prior to the issuance of a business**

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registration.

**Motion made by Commissioner Sharp, Seconded by Commissioner Wooten.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

**Regular Business Meeting**

6. Public Comments

Mr. Adam Schulze commented on a farm pond he is trying to build on his property.

Mr. Duane Gentes commented against the farm pond that Mr. Schulze is trying to build.

7. Consent Agenda

a. Approval of Minutes - October 1, 2021 Regular Meeting (staff-CC)

b. Approval of Minutes - October 1, 2021 Work Session (staff-CC)

c. Approval of Minutes - October 12, 2021 Joint Called Meeting (staff-CC)

d. Authorization for Chairman to sign GDOT Actual Cost Utility Agreement (staff-CM)

e. Authorization for Chairman to sign GDOT Title VI Plan Update for Putnam County Transit (staff-Tran)

f. Authorization for Chairman to sign GDOT 5311 Grant Application for Putnam County Transit (staff-Tran)

**Motion to approve the Consent Agenda.**

**Motion made by Commissioner McElhenney, Seconded by Commissioner Wooten.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

(Copy of documents made a part of the minutes on minute book pages \_\_\_\_\_ to \_\_\_\_\_.)

8. Authorization for Chairman to sign Letter of Support for Goodwill of Middle Georgia's American Rescue Plan Act Grant Application (staff-CM)

**Motion to authorize the Chairman to sign the Letter of Support for Goodwill of Middle Georgia's American Rescue Plan Act Grant Application.**

**Motion made by Commissioner McElhenney, Seconded by Commissioner Sharp.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

(Copy of letter made a part of the minutes on minute book page \_\_\_\_\_.)

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9. Authorization for Chairman to sign Intergovernmental Agreement with the Hospital Authority (staff-CM & Fin)

County Manager Van Haute explained that this is an Intergovernmental Agreement between Putnam County and Putnam General Hospital Authority to outline the county's allocation of money to the Hospital for premium pay and other eligible expenditures under the American Rescue Plan Act.

**Motion to authorize the Chairman to sign the Intergovernmental Agreement with the Hospital Authority.**

**Motion made by Commissioner Brown, Seconded by Commissioner Wooten.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

(Copy of agreement made a part of the minutes on minute book pages \_\_\_\_\_ to \_\_\_\_\_.)

10. Approval of Changes to the Putnam County Financial Policy (BW and staff-Fin)

Chairman Webster reviewed the proposed changes.

**Motion to approve the changes to the Putnam County Financial Policy as presented.**

**Motion made by Commissioner Sharp, Seconded by Commissioner McElhenney.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

(Copy of changes made a part of the minutes on minute book pages \_\_\_\_\_ to \_\_\_\_\_.)

11. Discussion and possible action concerning Electric Vehicle Charging Station (BW)

Chairman Webster explained that this is to apply for State ARPA funding to allow us to install two electric charging stations in the Administration Building parking lot. He has prepared the grant application and researched the costs associated with the project. The board will need to decide whether to apply and how much, if any, matching money to include.

**Motion to submit the application to the State with a 50% match (\$40,000.00)**

**Motion made by Commissioner Sharp, Seconded by Commissioner Wooten.**

**Voting Yea: Chairman Webster, Commissioner McElhenney, Commissioner Brown, Commissioner Sharp, Commissioner Wooten**

Copy of documents made a part of the minutes on minute book pages \_\_\_\_\_ to \_\_\_\_\_.)

**Reports/Announcements**

12. County Manager Report

County Manager Van Haute reported the following:

- He and Finance Director Cook met with representatives from Waste Management and trash costs will be increasing by \$500,000.00 per year. Waste Management will be here at the next meeting to make a presentation and the board will need to take action to sign new contract with possible changes to the current program.
- He also has documents available on the history of the farm pond discussed during public comments.

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13. County Attorney Report

No report.

14. Commissioner Announcements

Commissioner McElhenney: visited the new convenience center on Sammons Parkway and was very impressed; thanked the Public Works Department and County Manager for the good job.

Commissioner Brown: none

Commissioner Sharp: none

Commissioner Wooten: thanked the Fire Department & EMS for their good work on a terrible wreck in south Putnam and said he was proud of the way they took care of business.

Chairman Webster: advised that following the October 12th joint meeting with the city, County Manager Van Haute sent an email to the Mayor and City Administrator letting them know who was on our committee and asking if they could meet Monday, October 18th at 6pm. A response was received on Friday, October 15th saying they were unable to meet on October 18th and wouldn't be able to meet for 2-3 weeks. He also advised that SWA is working on an application for State ARPA money in the amount of \$600,000.00 and would like matching money from Baldwin & Putnam Counties. He called a meeting for Monday, October 25th at 1pm for discussion and possible action on this request.

**Closing**

15. Adjournment

**Motion to adjourn the meeting.**

**Motion made by Commissioner Sharp, Seconded by Commissioner McElhenney.**

**Voting Yea: Commissioner McElhenney, Commissioner Brown, Commissioner, Sharp, Commissioner Wooten**

Meeting adjourned at approximately 7:48 p.m.

ATTEST:

Lynn Butterworth  
County Clerk

Billy Webster  
Chairman

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

November 4, 2021

Dianne Pounds  
Putnam County Transit  
117 Putnam Drive  
Eatonton, GA 31024

Dear Ms. Pounds,

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ashley Finch, Rail/Transit Planner directly at [afinch@dot.ga.gov](mailto:afinch@dot.ga.gov) or (470) 432-1751.

Sincerely,

**Patricia  
Smith**

Patricia Smith

Transit Program Manager  
Division of Intermodal

Digitally signed  
by Patricia Smith  
Date: 2021.11.06  
18:02:11 -04'00'

# **Appendix D**

## **Title VI Notice to Public**

## Notifying the Public of Rights Under Title VI

**Putnam County Transit**

- Putnam County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Putnam County Transit Director.
- For more information on Putnam County Transit's civil rights program, and the procedures to file a complaint, contact 706-485-6355, email [dpounds@putnamcountyga.us](mailto:dpounds@putnamcountyga.us) or visit our administrative office at 117 Putnam Drive, Suite A Eatonton Georgia 31024 For more information visit [www.putnamcountyga.us](http://www.putnamcountyga.us).
- If information is needed in another language, contact 706-485-6355
- Si se necesita información en otro idioma, comuníquese al 706-485-6355

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**



# Putnam County Transit

## Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____ _____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No

**Section V**

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

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: \_\_\_\_\_

☐ Federal Court \_\_\_\_\_

☐ State Agency \_\_\_\_\_

☐ State Court \_\_\_\_\_

☐ Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:

Dianne Pounds, Transit Director  
117 Putnam Drive, Suite A  
Eatonton, GA 31024

# **Appendix F**

## **Public Participation Plan (PPP)**

## Introduction

The Public Participation Plan (PPP) for Putnam County Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Putnam County Transit. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Putnam County Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Putnam County Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

## Public Participation Goals

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

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

## Public Participation Methods

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

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

The public will be invited to provide feedback on the Putnam County Transit website (<https://www.putnamcountyga.us>) and all feedback on the site will be recorded and passed on to Putnam County Transit management. The public will also be able to call the Putnam County Transit office at 706-485-6355 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Putnam County Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

- In-vehicle advertisement
- 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 agency is not required to perform public hearings.

LCB Meetings

# **Appendix G**

## **Language Assistance Plan (LAP)**



## I. Introduction

Putnam County Transit operates a transit system within Putnam County. The Language Assistance Plan (LAP) has been prepared to address Putnam County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Putnam County service area there are 3801148 residents or 1.656% who describe themselves as not able to communicate in English "very well" (Source: US Census 2019 American Community Survey) (Source: US Census 2019 American Community Survey). Putnam County Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Putnam County Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

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

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

For many LEP individuals, public transit is the principal transportation mode available. It is important for Putnam County Transit be able to communicate effectively with all of its riders. When Putnam County Transit is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Putnam County 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 Putnam County Transit undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

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

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

## II. Four Factor Analysis

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

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

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

Of the 20,705 residents in the Putnam County service area 380 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Putnam County services. For the Putnam County Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 94% speak English “very well”. For groups who speak English, 1.65% speak, less than 1% speak “less than very well” and and speak Spanish.

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

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

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

Putnam County 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. Phone inquiries and staff survey feedback indicated that dispatchers and drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who

mainly spoke Spanish. Over the past 3 years, Putnam County Transit has had 2 requests for translated documents.

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

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

We will reach out to the LEP riders, using a Language Line Interpreter Service for other than English and Spanish individual.

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

Putnam County Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: Language Line Personal Interpreter Service for the cost of \$3.95 a minute, Brochures and Flyers: \$55.00. Putnam County Transit provides a reasonable degree of services for LEP populations in its service area.

**III. Language Assistance Plan**

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

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

The five elements are addressed below.

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

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

Putnam County Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 948.2% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (4.1%4.1%). Of those whose primary spoken language is Spanish, approximately 0.70.7% identify themselves as speaking less than "very well". Those residents

whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for less than 1% of the service area population.

Putnam County 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 Putnam County Transit Meetings. This will assist Putnam County Transit 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 Putnam County Transit 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.

**b. Element 2: Language Assistance Measures**

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

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

Putnam County Transit 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 Putnam County Transit 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.

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



**c. Element 3: Training Staff**

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

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying 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 Putnam County Transit the most important staff training is for Customer Service Representatives and transit drivers.

The following training will be provided to Customer Service Representative:

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

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

Putnam County Transit 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 Putnam County Transit office lobby, on buses, and public places. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

**e. Element 5: Monitoring and Updating the Plan**

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

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

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

#### **IV. Safe Harbor Provision**

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

Putnam County Transit service area does not have LEP populations which qualify for the Safe Harbor Provision. [As shown in Appendix H, Your 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. Putnam County Transit 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:**

### **Putnam County Transit Service Area**



<u>Language</u>	<u>County</u>	<u>Percent of Total County Population</u>
Total	Putnam County	20,705
Speak only English	9,380	94%
Spanish	859	4%
Speak English "very well"	709	3.4%
Speak English less than "very well"	150	0.6%
Other Indo-European languages	331	1.5%
Speak English "very well"	130	0.5%
Speak English less than "very well"	201	1%
Asian and Pacific Island languages	102	0.5%
Speak English "very well"	73	0.4%
Speak English less than "very well"	29	0.05%
Other languages	33	0
Speak English "very well"	33	0
Speak English less than "very well"	0	0

# **Appendix I**

## **Demographic Maps**

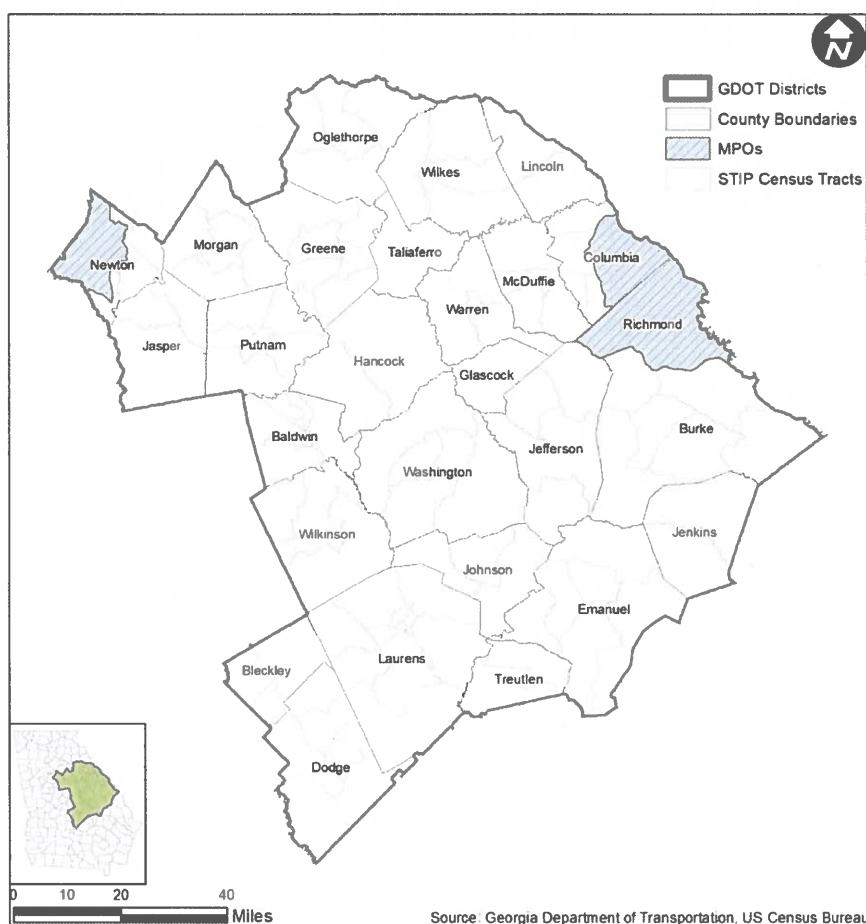


## Environmental Justice Identification & Proposed Outreach Report

### 5.2 District 2

District 2 consists of 27 counties to the southeast of the Atlanta metro area, stretching to the South Carolina border. The study area consists of census tracts in 26 counties, and does not include any tracts from the single county in District 2 that is completely under the authority of the MPO. District 2 contains 112 census tracts of which 70 are over the minority EJ threshold, 63 are over the Elderly EJ threshold, 62 tracts are above the low-income EJ threshold and 26 tracts are above the LEP EJ threshold. Figure 14, below, is a map of the counties located in District 2.

Figure 14: District 2



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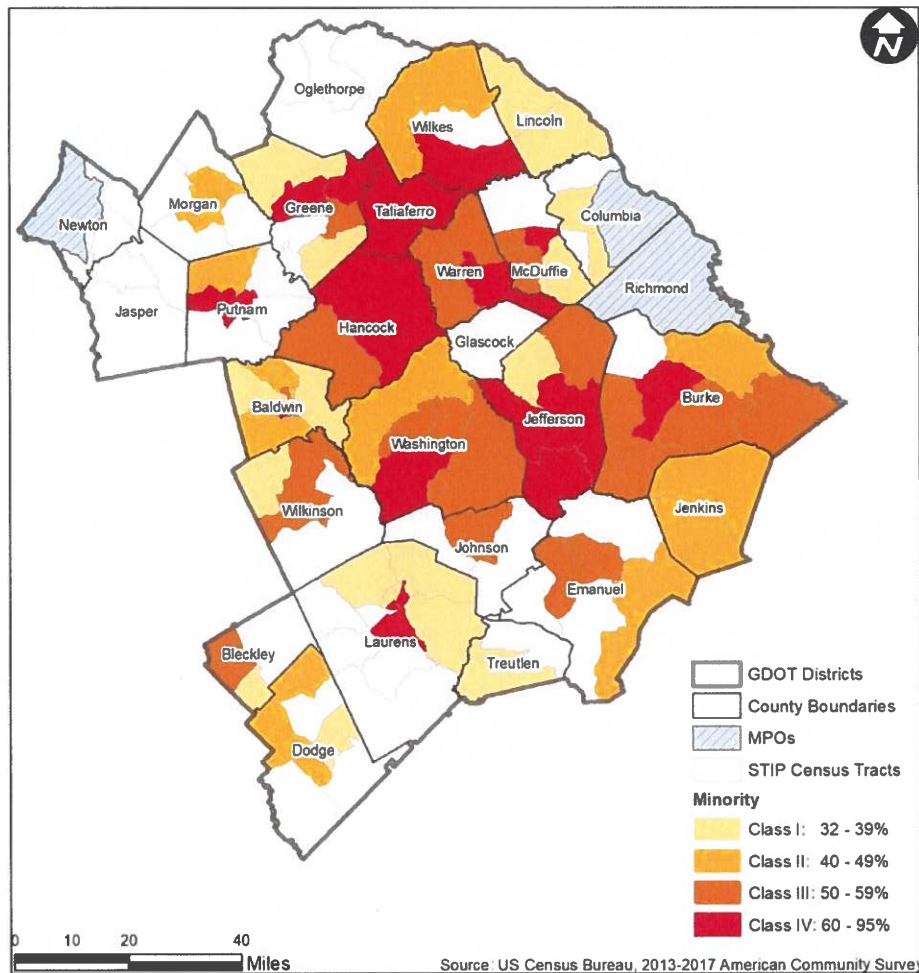


Environmental Justice Identification & Proposed Outreach Report

### 5.2.1 Minority EJ Population

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

**Figure 15: District 2 Minority EJ Population**



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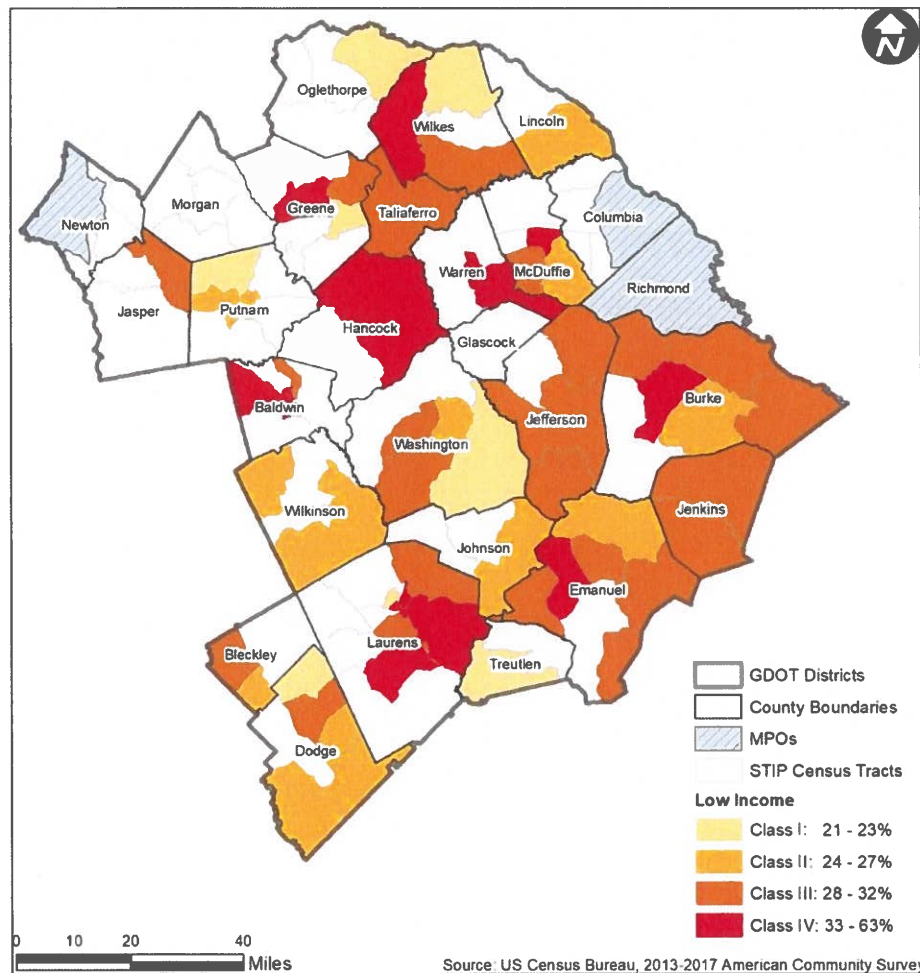


Environmental Justice Identification & Proposed Outreach Report

### 5.2.2 Low-income EJ Population

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

Figure 16: District 2 Low-income EJ Population





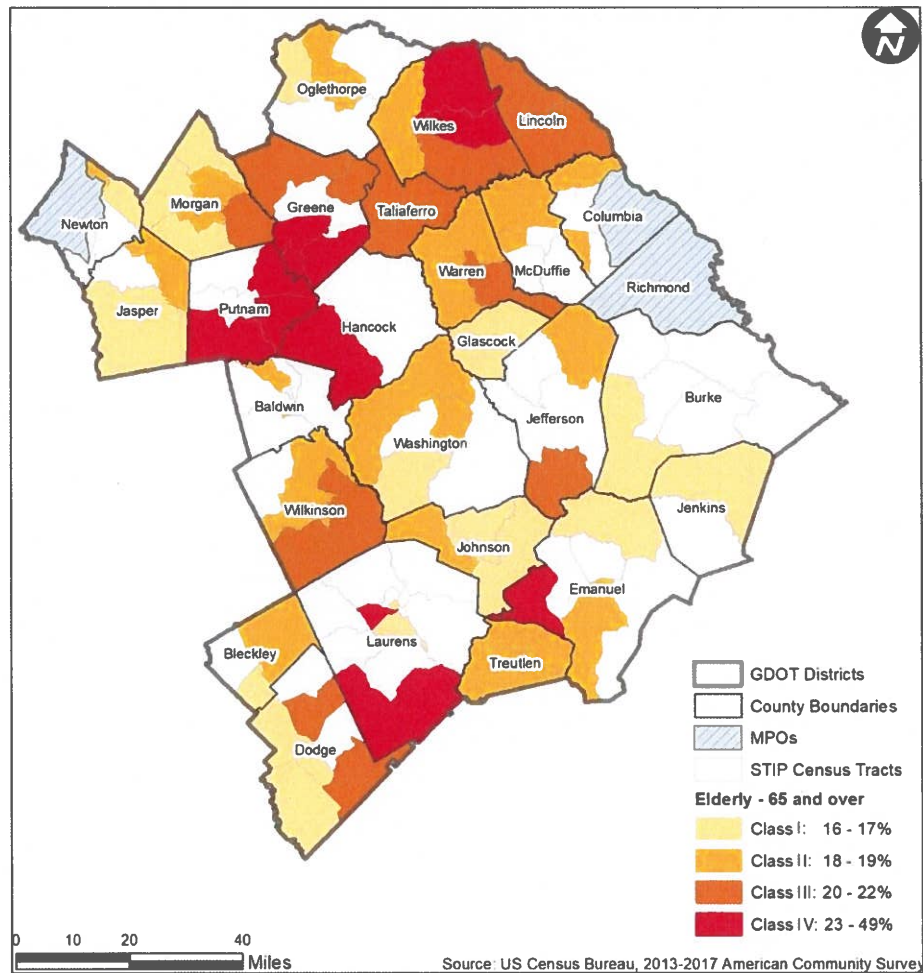


Environmental Justice Identification & Proposed Outreach Report

### 5.2.3 Elderly EJ Population

Figure 17 is a map of the minority EJ population located in District 2. Within District 2, 56 percent of the tracts have an elderly population above the elderly EJ threshold. The analysis shows 12 Class IV tracts located in the following counties: Emanuel, Greene, Hancock, Laurens, Putnam and Wilkes. The analysis also shows 12 Class III tracts, 21 Class II tracts, and 18 Class I tracts. Tract locations can be found in Figure 17.

Figure 17: District 2 Elderly EJ Population



# **Appendix J**

## **Title VI Equity Analysis**

Putnam County Transit does not have any recently constructed or planned facilities and have not performed Title VI Equity Analysis.