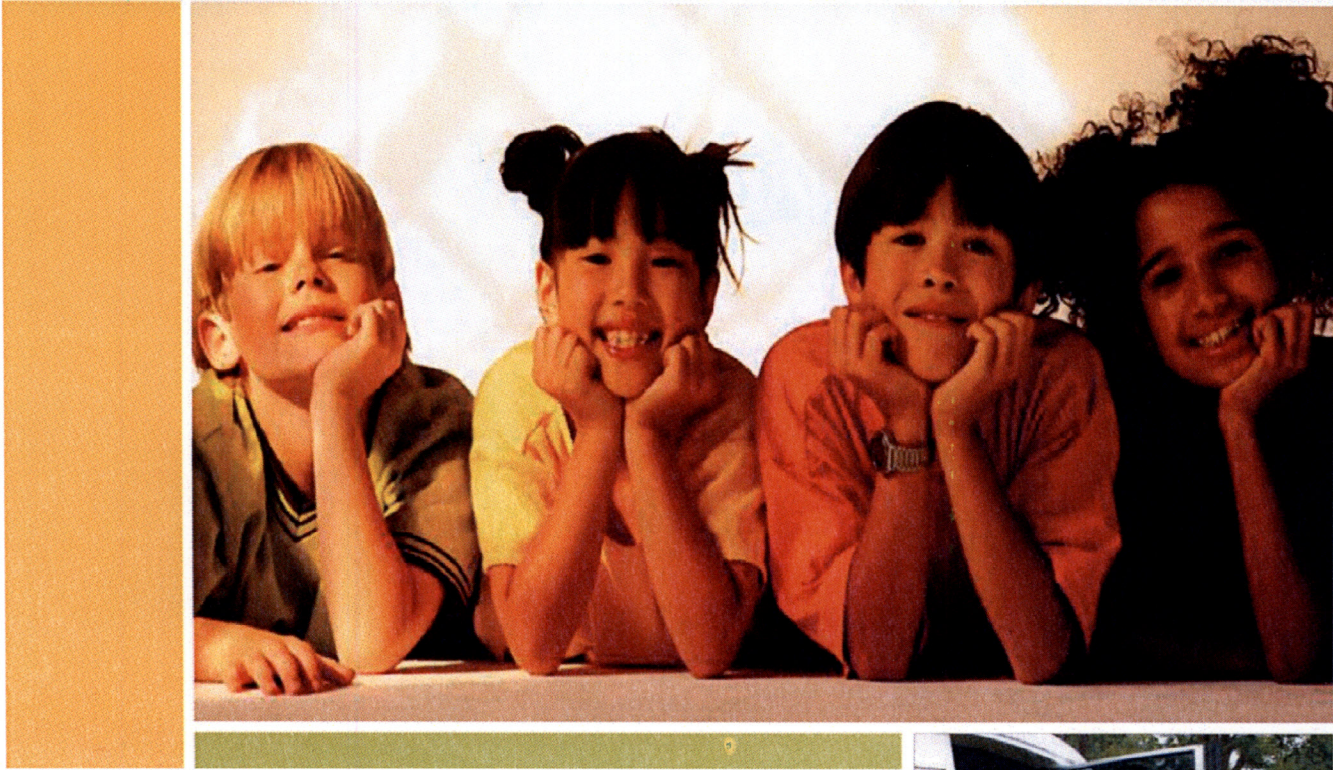


City of Valdosta Public Transit



Title VI Plan



Date Adopted: September 19, 2024

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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].

City of Valdosta Public Transit assures the Georgia Department of Transportation (GDOT) 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 Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 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.

City of Valdosta Public 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 Third Party Operator (TPO) 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 languages 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 City of Valdosta Public 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: Richard Hardy

Printed Name: Richard Hardy

City Manager, City of Valdosta, Date: Date pending - 10/10/24

2.0 Introduction & Description of Services

City of Valdosta Public 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.

City of Valdosta Public Transit is a sub-recipient of FTA funds and provides service in the following: A description of the current City of Valdosta Public Transit system is included in Appendix B.

Title VI Liaison

City of Valdosta Public Transit
Larry Ogden, Public Works Director
Employed by: Subrecipient
Phone Number: (229) 259-3585
Address: P.O Box 1125
1017 Myrtle Street
Valdosta, GA 31603-1125

Alternate Title VI Contact

Alternate Title VI:
Ronald Robinette, Superintendent
Employed by Subrecipient:
Phone Number: (229) 259-3585
Address: P.O Box 1125
1017 Myrtle Street
Valdosta, GA 31603-1125

City of Valdosta Public 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.

City of Valdosta Public Transit is not a first-time applicant for FTA/GDOT funding. The following is a summary of City of Valdosta Public Transit’s current and pending federal and state funding.

Title	Contract Number	Dates	Actual Amount	Federal Funds	State Funds	Local Funds
FTA 5307 Funding	T007059	07/01/2023 06/30/2024	\$2,244,767	\$1,455,529	\$90,971	\$698,276
FTA 5307 Funding	T008424	07/01/2023 06/30/2025	\$2,395,692	\$1,470,757	\$90,971	\$833,964

During the previous three (3) years, FTA/GDOT did not complete a Title VI compliance review of City of Valdosta Public Transit. City of Valdosta Public Transit has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

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.

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.

City of Valdosta Public 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

This Title VI Plan received GDOT concurrence on **(Date pending)**. The Plan was approved and adopted by City of Valdosta Council during a meeting held on **Date pending**. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. As listed in Appendix D, the notice must include:

- A statement that the agency operates programs without regard to race, color, or 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.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of City of Valdosta Public Transit's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of City of Valdosta Public Transit's office(s) including the reception desk and meeting rooms, and on the City of Valdosta Public Transit's website (<https://www.valdostacity.com/public-works/valdosta-demand>). Additionally, City of Valdosta Public Transit will post the notice at stations, stops, and on transit vehicles.

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 City of Valdosta Public Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). City of Valdosta Public Transit investigates complaints received no more than 180 days after the alleged incident.

Once the complaint is received, City of Valdosta Public 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.

City of Valdosta Public Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, City of Valdosta Public 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, City of Valdosta Public 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, they will issue one (1) 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 LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on City of Valdosta Public Transit's website (<https://www.valdostacity.com/public-works/valdosta-demand/title-vi-complaint-procedure>).

4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E and on City of Valdosta Public Transit's website (<https://www.valdostacity.com/public-works/valdosta-demand/title-vi-complaint-procedure>).

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. The City of Valdosta Public 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 Subrecipient Assistance and Monitoring

City of Valdosta Public Transit does not have any sub-recipients to provide monitoring and assistance to. As a subrecipient to GDOT, City of Valdosta Public Transit utilizes the subrecipient assistance and monitoring provided by GDOT, as needed. In the future, if City of Valdosta Public Transit has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Third Party Operators and Subcontractors

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

Nondiscrimination Clauses

During the performance of a contract, the TPO, its assignees, and successors in interest must agree to the following clauses:

1. **Compliance with Regulations:** The TPO and Subcontractor shall comply with regulations relative to nondiscrimination in Federally assisted programs of the U.S. Department of Transportation (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 TPO and Subcontractor, regarding the work performed during the contract, shall not discriminate on the basis of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The TPO and Subcontractor 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 TPO, 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 TPO of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, or national origin.
4. **Information and Reports:** The TPO 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 GDOT and/or the FTA, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a TPO is in the exclusive possession of another who fails or refuses to furnish this information the TPO shall so certify to the GDOT, and/or the FTA, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the TPO's noncompliance with the nondiscrimination provisions of this contract, City of Valdosta Public Transit shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the TPO under the contract until the TPO complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The TPO shall include the provisions of paragraphs one (1) through six (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The TPO shall take such action with respect to any subcontract or procurement as the City of Valdosta Public Transit, GDOT, and/or the FTA, may direct as a means of enforcing such provisions including sanctions for noncompliance.

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: investigation status, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related.

In accordance with 49 CFR 21.9(b), City of Valdosta Public 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 City of Valdosta Public 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.

The City of Valdosta Public Transit has had zero 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 any incidents will be recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

FTA Circular 4702.1B, 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 City of Valdosta Public 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 City of Valdosta Public 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 City of Valdosta Public 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 of this Title VI Plan.

Current Outreach Efforts

The City of Valdosta Public 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 City of Valdosta Public Transit’s recent, current, and planned outreach activities.

- Press Releases – Used to announce upcoming meetings and activities and to provide information on specific issues related to transportation planning.
- Print Display Ads – Used to advertise public meetings and review and comment periods for transportation plans and projects. Display ads are published in area newspapers and distributed at public facilities throughout the City of Valdosta.
- City of Valdosta Newsletter – A quarterly publication used to provide information on transportation issues, projects, documents, contacts and resources.
- City of Valdosta Website – Used to display general information about transit, copies of major transit transportation documents, committee meeting schedules, agendas and minutes, project updates and the City’s Newsletter. The website is also used to advertise public meetings and review and comment periods for transportation plans and projects.
- Speaking Engagements – The staff shall make staff available to speak to civic groups, neighborhood associations, and other interested parties about City’s transportation planning and projects.
- 7. Area Rapid Transit Service (ARTS) Committee Meetings – The ARTS committee meetings will be a regularly-scheduled forum for the discussion of, and updates on regional transportation needs, plans, programs and activities.
- City of Valdosta Public Meetings

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).

The City of Valdosta Public Transit operates a transit system within the City of Valdosta. The Language Assistance Plan (LAP) has been prepared to address City of Valdosta Public Transit’s responsibilities as they relate to the needs of individuals with LEP. Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the City of Valdosta Public Transit service area there are 875 residents or 1.69% who describe themselves as not able to communicate in English “very well” (Source: US Census Bureau). The City of Valdosta Public 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. The City of Valdosta Public Transit has utilized the USDOT 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.

The City of Valdosta Public 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, the City of Valdosta Public Transit will ensure the following:

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

The City of Valdosta Public Transit has not constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, the City of Valdosta Public Transit does not have any Title VI Equity Analysis reports to submit with this plan. The City of Valdosta Public Transit will utilize the demographic maps included in Appendix I for future Title VI analysis.

The Title VI Equity Analysis report prepared during the planning stage is included in Appendix J of this Title VI Plan.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 4: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

The City of Valdosta Public Transit is not a fixed route service provider.

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The City of Valdosta Public Transit is an On-demand Service which does not provide a fixed route service.

10.2 Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. The City of Valdosta Public Transit has prepared the following policies for its transit system.

- a. **Distribution of Transit Amenities**
Subsidized transportation for qualifying residents shall be provided only within the service area. The City of Valdosta Public Transit may adjust allowable locations at any time during the term of the contract.
- b. **Vehicle Assignment**
The proposal recommends ramping up the fleet over the first three (3) months of service, launching with five (5) vehicles and scaling to the full fleet of seven (7) as ridership grows. The TPO proposes to launch the pilot with hybrid vehicles and incorporate fully electric vehicles after the nine (9) month pilot period. To accommodate riders in wheelchairs, one third of the fleet will be wheelchair accessible. Due to the limited supply and high upfront cost of ADA-compliant hybrid or electric Wheelchair Access Vehicles (WAVs) currently available in the United States, conventional fuel WAVs will be utilized to ensure a quicker and more cost-effective launch.

	Ambulatory Vehicles	WAV
Number of Vehicles	13	5
Vehicle Type	Minivans	Conventional fuel vehicles
Proposed Make/Model (capacity w/out driver)		5 wheelchair accessible

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three (3) years, on a date determined by FTA, each recipient is required to submit the following information to the FTA as part of their Title VI Program. Subrecipients shall submit the information below to their primary recipient (the entity from whom the subrecipient 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 LEP populations, as well as a summary of outreach efforts made since the last Title VI Program submission.
- LAP for providing language assistance to persons with (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 fifty (50) or more fixed route vehicles in peak service and are 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.
The City of Valdosta Public 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 launch a shared, on-demand transit service that enhances job access, creates a sustainable alternative to private vehicle use, and offers a high-quality transit experience for all residents and visitors, including seniors, low-income individuals and those with disabilities.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.
The City of Valdosta Public Transit is a Demand Response transit system. The management team consists of Larry Ogden (Public Works Director), Ronald Robinette (Operations Superintendent) and a Third Party Operator (TPO). The TPO has programmatic responsibility for the City of Valdosta Public Transit program and oversees the operation. The Public Works Director has day-to-day responsibility of the program on behalf of the City of Valdosta. The Public Works Director and his staff are located at 1017 Myrtle St Valdosta, GA. Budgeting and financial reports are the responsibilities of both the TPO General Manager and the City of Valdosta Public Works Director. Information is readily available to the Valdosta City Council. The Valdosta City Transit operation hours are from 5:30am to 9:00pm Monday thru Friday, except for County holidays. The City of Valdosta does not have any transit employees. All transit employees will be under the employment of the TPO.

Security Plan:

1. PURPOSE: To ensure all FTA funded equipment is secure at all times.
2. GENERAL: All vehicles, when not in use or under personal control must be properly secured at all times to prevent theft or destruction which could preclude mission accomplishment. At a minimum the following rules will be followed:
 - a) All equipment will be inspected upon completion of each operation or maintenance service to ensure it is turned off and properly secured.
 - b) All keys and credit cards will be secured in a key cabinet or other approved secure storage device.
 - c) All vehicles will be parked in a safe and secure area, at a city facility. Never park vehicles at a private and/or employee residence.

Safety Plan:

1. PURPOSE: To ensure a safe operating and working environment in all Transit Systems overseen by the City of Valdosta Public Transit .
2. GENERAL: All employees play a critical role in achieving a safe working environment and ensuring all equipment is in a safe operating condition. The TPO will:
 - a) Ensure all assigned operators are trained in the safe operation and preventive maintenance procedures for the equipment to be utilized.
 - b) Ensure all assigned safety equipment is on board and meets established safety standards.
 - c) Restrict use of equipment with questionable reliability or safety performance levels.
 - d) Ensure drivers are trained in proper lift operating and wheelchair securement procedures in accordance with the Passenger Service and Safety Manual
 - e) Ensure all employees receive training in the proper use of firefighting equipment and evacuation procedures.

3. RESPONSIBILITIES. Operators will complete daily Pre & Post-Trip Inspection of vehicle to include cycling the wheelchair lift. Discovered deficiencies that will affect the safe operation of the equipment will be corrected before continuing operations. Wheelchair lift failures must be repaired within five (5) days or vehicle will be taken out of service until repairs are completed.

4. SAFETY RULES. Personnel working with or operating equipment or visiting shop/maintenance facilities will adhere to the following minimum requirements:

- a) No smoking in shop areas or when operating or riding in transit vehicle.
- b) Proper storage/securement of all loose items on vehicle.
- c) Keep vehicle clean and uncluttered (i.e., no loose items on dash or around driver's seat).
- d) Always obey speed limits and all other traffic regulations.
- e) Proper evacuation procedures will be used as outlined in safety training.
- f) Drivers will use the proper lift operating and wheelchair securement procedures in accordance with the Passenger Service and Safety Manual.
- g) Drivers will assist passengers on and off vehicle as required.
- h) Always use approved cleaning compounds.
- i) No horseplay at any time.
- j) Remove all jewelry and loose-fitting clothing before inspecting or working on or around vehicles.
- k) Use of personal cell phones is prohibited while operating a transit vehicle.

3. Indicate if your agency is a government authority.

The City of Valdosta Public Transit is an FTA 5307 program. The City of Valdosta Council will have an executed contract with a TPO, GDOT, and the FTA.

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

The contracted TPO will be responsible for insurance, training and management, administration to include the Transit Drug & Alcohol Program.

For the City of Valdosta Public Transit's on-demand rideshare project, the TPO will be required to a turnkey Transportation-as-a-Service solution, including each software capability and support service as follows:

- Vehicles and Fleet Management: Provision of high-quality, low-emission vehicles with expert fleet cleaning, maintenance, and inspection services
- Drivers and Driver Training: Qualified and courteous drivers, trained on all operational and customer service procedures.
- Customer Service, Sign-up, and Reservations: An intuitive mobile application, web portal, and phone service for booking both on-demand and pre-scheduled trips and receiving automated trip status updates.
- Required Insurances: Appropriate insurance coverage and operational practices to ensure ongoing compliance with applicable laws, regulations, and the City of Valdosta Public Transit's requirements.
- Reporting and Data: Comprehensive reports providing unparalleled visibility into pilot performance and service trends.
- Project Management and Ongoing Support: A dedicated TPO team, including a local field manager, to manage project planning, ensure efficient operational management, and provide support to the City of Valdosta Public Transit .

- Drivers: Qualified and courteous drivers, trained on all operational and customer service procedures.
- The TPO is also responsible for all administrative aspects of the program. Reports are submitted monthly to the City of Valdosta Public Transit for review and approval. The City of Valdosta Public Transit submits reports to GDOT as required.

5. Who provides vehicle maintenance and record keeping?

Maintenance on all 5307 vehicles is coordinated by the TPO and will be maintained in a first-class state of repair, ensuring each rider has a safe and enjoyable trip experience. The TPO will leverage on-the-ground support from their vehicle leasing partner, who will manage fleet provision, maintenance, and storage. All vehicles must be inspected and approved in compliance with the laws of the State of Georgia. 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 and are maintained by the TPO. All records are maintained and retained for the life of the vehicle plus three (3) years.

6. Number of current transportation related employees

The City of Valdosta Public Transit does not have any transit related employees; all transit employees are in the employment of the TPO.

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

The City of Valdosta Public Transit does not employ any drivers. Drivers are employed by TPO, all drivers are required to be trained in First Aid and attend a defensive driving course before being allowed to drive 5307 vehicles. Drivers that will be driving vehicles with the capacity to transport more than 15 passengers including driver will be required to have a CDL license.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to the entire City of Valdosta, serving an area of approximately thirty-six (36) square miles. Our service incorporates connections for commuters and job-seekers to employment centers, University student travel to/from class or between campus and Downtown Valdosta, trips to community resources, such as senior centers, doctor's appointments, and the Regional Library and daily transportation for seniors and riders with disabilities to access grocery stores and shops in Downtown Valdosta.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

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

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI**City of Valdosta Public Transit System**

- The City of Valdosta Public Transit System hereby gives public notice that it is the policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statues and regulations in all programs and activities. It is our policy that no person in the United States of America shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs or activities. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Valdosta Public Transit System.
- For more information on the City of Valdosta Public Transit System's civil rights program, and the procedures to file a complaint, contact 229-259-3585; email PublicWorksDistibution@valdostacity.com; or visit our administrative office at 1017 Myrtle Street, Valdosta GA, 31601. For more information, visit <https://www.valdostacity.com/public-works/valdosta-demand>.
- 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
- If information is needed in another language, contact 229-259-3585.

Appendix E

Title VI Complaint Form

City of Valdosta Public Transit

Title VI Complaint Form

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

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

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

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

Signature and date required below

Signature

Date

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

City of Valdosta Public Transit
 Larry Ogden, Public Works Director
 P.O Box 1125
 1017 Myrtle Street
 Valdosta, GA 31603-1125

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for City of Valdosta Public 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 City of Valdosta Public 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 the City of Valdosta Public 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 City of Valdosta Public 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 City of Valdosta Public Transit and its operations. The goals for this PPP include:

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

The City of Valdosta Public 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 City of Valdosta website (<https://www.valdostacity.com/report-a-concern>) and all feedback on the site will be recorded and passed on to City of Valdosta Public Transit management. The public will also be able to call the City of

Valdosta Public Transit office at 229-259-3585 during its hours of operation. Feedback collected over the phone will be recorded and passed on to City of Valdosta Public 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, the City of Valdosta Public 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 City Customer Service 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.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

The City of Valdosta Public Transit uses a Third Party Operator (TPO) to operate a transit system within the City of Valdosta. The Language Assistance Plan (LAP) has been prepared to address City of Valdosta Public 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 the City of Valdosta Public Transit service area there are 875 residents or 1.69 % who describe themselves as not able to communicate in English "very well" (Source: US Census Bureau). The City of Valdosta Public 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. The City of Valdosta Public Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a Four Factor Analysis to develop its LAP.

The USDOT 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 the City of Valdosta Public Transit be able to communicate effectively with all of its riders. When the City of Valdosta Public 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. The City of Valdosta Public Transit is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that the City of Valdosta Public 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 City of Valdosta Public 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 the City of Valdosta Public Transit services and identify needs for language assistance. This analysis is based on the Four Factor Analysis to implement the Department of Transportation's Policy Guidance concerning Recipients' responsibilities to LEP, 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 City of Valdosta Public Transit program, activity or service.
2. The frequency with which LEP persons come in contact with City of Valdosta Public Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by City of Valdosta Public Transit to the LEP population.
4. The resources available to the City of Valdosta Public Transit and overall costs to provide LEP assistance.

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

Of the 51,748 residents in the City of Valdosta Public Transit service area 875 residents , or 1.69%, describe themselves as speaking English less than "very well"(US Census Bureau). Survey of the U.S. Census Bureau shows that among the area's LEP residents, 3.8% speak English "very well". People of Spanish descent are the primary LEP persons likely to utilize the City of Valdosta Public Transit services with 2.27% speaking English "very well" and 1.1% less than "very well".

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

The City of Valdosta Public Transit has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that Spanish speaking passengers are more likely to be LEP individuals. Phone inquiries and staff survey feedback indicated the City of Valdosta Public Transit dispatchers and drivers will interact infrequently with LEP persons. The majority of these interactions will occurred with LEP persons who mainly speak Spanish.

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.

An on-board passenger survey was conducted to collect data on usage of and access to the City of Valdosta Public Transit services. According to the survey, the most common age among all the participants in the survey was 65 or older. This supports the fact that City of Valdosta Public Transit can be considered a senior transit service as most of its patrons are over the age of 65.

To further access personal mobility options, each respondent was asked how he or she would have made the surveyed trip if the City of Valdosta Public Transit not been available. The most frequent response was “friend of family member” (40%). An additional 25% indicated they would not have made the surveyed trip if the service was not available. This data indicates that the City of Valdosta Public Transit Service is very important as a primary means of transportation for its customers.

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

The City of Valdosta Public 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 a Riders Guide and commonly used phrase translation handouts at no cost. The City of Valdosta Public Transit provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan (LAP)

In developing a LAP, FTA guidance recommends the analysis of the following five (5) 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 (5) 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 (2) factors in the Four-Factor Analysis.

The City of Valdosta Public 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, 94.51% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (3.37%). Of those whose primary spoken language is Spanish, approximately 1.1% 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 0.6% of the service area population.

The City of Valdosta Public Transit may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at City of Valdosta Public Transit Meetings. This will assist City of Valdosta Public 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 City of Valdosta Public 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.

The City of Valdosta Public 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 City of Valdosta Public 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.

The City of Valdosta Public Transit 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 the City of Valdosta Public 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

The City of Valdosta Public 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 City of Valdosta Public Transit office lobby, on Transit vehicles, and City facilities information bulletin boards. 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 City of Valdosta Public Transit's financial resources are sufficient to fund language assistance resources needed

The City of Valdosta Public 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. The City of Valdosta Public Transit is open to suggestions from all sources, including customers, City of Valdosta Public 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 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 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.

The City of Valdosta Public Transit service area does not have LEP populations which qualify for the Safe Harbor Provision.

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. The City of Valdosta Public 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:

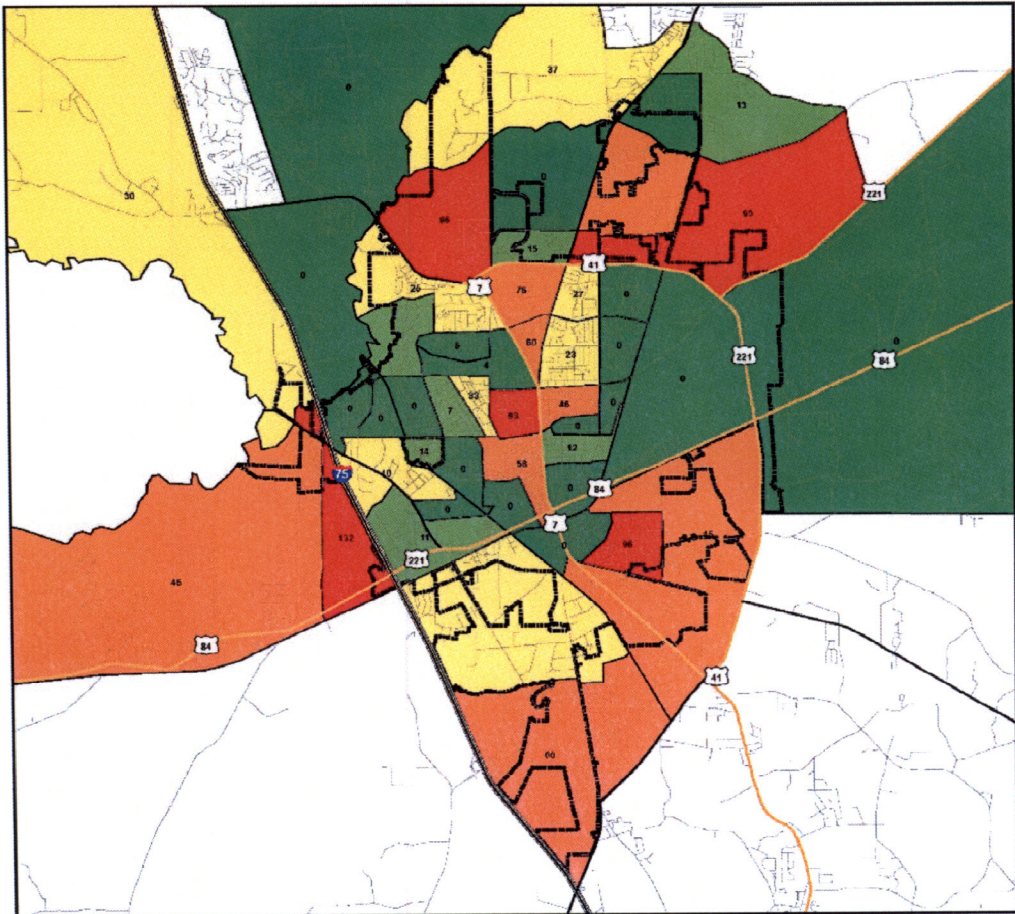
City of Valdosta Public Transit Service

Area

Valdosta, Georgia		
Label	Estimate	% of Total Population
Total:	51,748	
Speak only English	48,908	94.51%
Spanish:	1,743	3.37%
Speak English "very well"	1,176	2.27%
Speak English less than "very well"	567	1.10%
French, Haitian, or Cajun:	94	
Speak English "very well"	94	0.18%
Speak English less than "very well"	0	0.00%
German or other West Germanic languages:	139	
Speak English "very well"	139	0.27%
Speak English less than "very well"	0	0.00%
Russian, Polish, or other Slavic languages:	16	
Speak English "very well"	0	0.00%
Speak English less than "very well"	16	0.03%
Other Indo-European languages:	432	
Speak English "very well"	321	0.62%
Speak English less than "very well"	111	0.21%
Korean:	153	
Speak English "very well"	113	0.22%
Speak English less than "very well"	40	0.08%
Chinese (incl. Mandarin, Cantonese):	9	
Speak English "very well"	4	0.01%
Speak English less than "very well"	5	0.01%
Vietnamese:	0	
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Tagalog (incl. Filipino):	19	
Speak English "very well"	8	0.02%
Speak English less than "very well"	11	0.02%
Other Asian and Pacific Island languages:	113	
Speak English "very well"	39	0.08%
Speak English less than "very well"	74	0.14%
Arabic:	23	
Speak English "very well"	0	0.00%
Speak English less than "very well"	23	0.04%
Other and unspecified languages:	99	
Speak English "very well"	71	0.14%
Speak English less than "very well"	28	0.05%
Sum of: English "very well"	1,965	3.80%
Sum of: English LESS than "very well"	875	1.69%

Appendix I

Demographic Maps



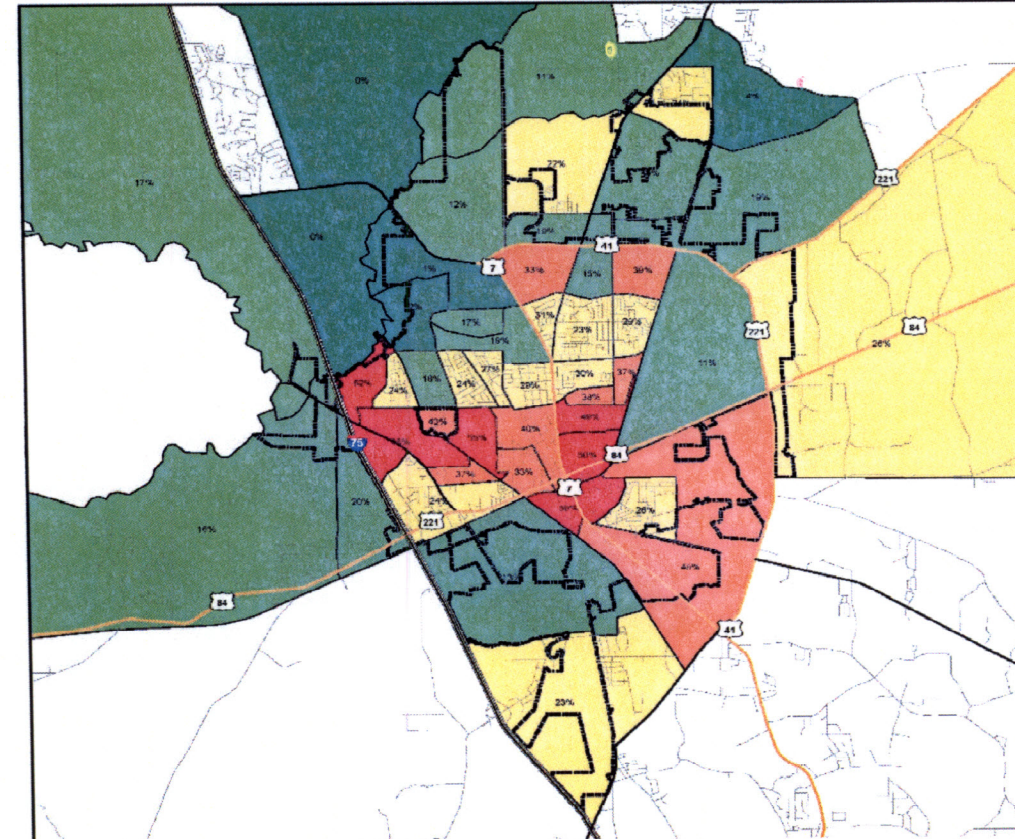
Map Legend

Interstates	Limited English Proficiency
State Routes	0 - 5
US Highways	6 - 15
Roads	16 - 40
City of Valdosta	41 - 75
	77+

* Limited English Proficiency using American Community Survey 2019 5-year data

City of Valdosta 2020 Transit Program Limited English Proficiency

Map created January 2021 for general planning purposes only. Refer to questions on data accuracy and availability to the Southern Georgia Regional Commission.



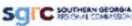
Map Legend

Interstates	Poverty Percentages
State Routes	0% - 4%
US Highways	5% - 20%
Roads	21% - 31%
City of Valdosta	32% - 40%
	40% - 60%

* Poverty Percentages based on population in poverty divided by population whose poverty status has been determined using American Community Survey 2019 5-year data.

City of Valdosta 2020 Transit Program Poverty Percentages

Map created January 2021 for general planning purposes only. Refer to questions on data accuracy and availability to the Southern Georgia Regional Commission.



Appendix J

Title VI Equity Analysis

The City of Valdosta Public Transit has not performed Title VI Equity Analysis.

The City of Valdosta has not recently constructed nor is there a transit facility planned.