

Brunswick Area Transit

Title VI Plan

Date Adopted: Month/Day/Year

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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].

Brunswick Area Transit, operated by the City of Brunswick in coordination with Glynn County, assures the Georgia Department of Transportation (DOT) that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under Federal Transit Administration (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.

Brunswick Area 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 Brunswick Area Transit.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

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

Signature: _____

Printed Name: _____

Executive Director/Signatory Authority, Brunswick Area Transit, Date: Month/Day/Year

2.0 Introduction & Description of Services

Brunswick Area 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.

Brunswick Area Transit is a sub-recipient of FTA funds and provides service in Glynn County and the City of Brunswick, Georgia. A description of the current Brunswick Area Transit system is included in Appendix B.

Title VI Liaison

Brunswick Area Transit Liaison Name and Title

Employed by (TPO or Sub recipient)

Phone Number

Address

Alternate Title VI Contact

Alternate Title VI Contact Name and Title

Employed by (TPO or Sub recipient)

Phone Number

Address

Brunswick Area 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.

Brunswick Area Transit is a first-time applicant for FTA/GDOT funding. The following is a summary of Brunswick Area Transit's current and pending federal and state funding.

Current and Pending FTA Funding

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

Current and Pending GDOT Funding

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

Current and Pending Federal Funding (non-FTA)

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

Current and Pending State Funding (non-GDOT)

1. [Title], [Date], [Amount], [Current] or [Pending]
2. [Title], [Date], [Amount], [Current] or [Pending]

During the previous three years, Federal Transit Administration or Georgia DOT **did not** complete a Title VI compliance review of Brunswick Area Transit. Brunswick Area Transit **[has] or [has not]** been found to be in noncompliance with any civil rights requirements.

If you select "did not" this section is complete and the remainder of 2.1 should be removed.

The following is a summary of the compliance review.

- a. Date of the compliance review
Insert date of the Title VI compliance review
- b. The purpose or reason for the review
Insert purpose or reason for Title VI compliance review

- c. Agency or organization that performed the review
Insert name or agency or organization that performed the review
- d. Summary of the finding and recommendations of the review
Insert summary of the findings and recommendations from the review
- e. Report on the status of the findings and recommendations
Insert a report on the status of the findings and recommendations
- f. Current status of the compliance review
Insert the current status of the compliance review

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

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.

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.

Brunswick Area Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by Georgia DOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on date . The Plan was approved and adopted by **Brunswick Area Transit's Board of Directors** during a meeting held on date . 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. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

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

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Brunswick Area 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 Brunswick Area Transit's office(s) including the reception desk and meeting rooms, and on the Brunswick Area Transit's website at yourcommunitytransit.gov. Additionally, Brunswick Area Transit will post the notice at stations, stops and on transit vehicles.

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

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

Once the complaint is received, Brunswick Area 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.

Brunswick Area Transit has **ninety (90)** days to investigate the complaint. If more information is needed to resolve the case, Brunswick Area 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, Brunswick Area 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 on Brunswick Area Transit's website (www.yourcommunitytransit.com).

4.2 Complaint Form

A copy of the complaint form in English **and Spanish** is provided in Appendix E and on Brunswick Area Transit's website (www.yourcommunitytransit.com).

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

If your agency receives funding from more than one primary recipient, this paragraph should be modified to note that the Title VI Plan will be submitted to all primary recipients, as needed. 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

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

4.5 Sub recipients and Subcontractors

Brunswick Area 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. Brunswick Area 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, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section

- 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
 4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
 5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Brunswick Area 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 Brunswick Area Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with GDOT, Brunswick Area Transit and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Brunswick Area Transit and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

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

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

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 Brunswick Area 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 Brunswick Area Transit. It is our desire to take into consideration community sentiment and public opinion based upon well-executed outreach efforts prior to making policy and service delivery decisions. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Brunswick Area 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

Brunswick Area Transit is required to submit a summary of public outreach efforts made over the last three (3) years. As a new start-up transit service, Brunswick Area Transit will document future outreach activities in future updates to this plan. The following is a list and short description of Brunswick Area Transit's recent, current, and planned outreach activities:

- None to date

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).

Brunswick Area Transit operates a transit system within the City of Brunswick and portions of Glynn County. The Language Assistance Plan (LAP) has been prepared to address Brunswick Area 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 Brunswick Area Transit service area there are approximately 2,263 residents or 2.8% who describe themselves as not able to communicate in English very well (source: US Census; 1,609 (2.0%) speak Spanish and the balance speak other languages as listed in Appendix H). Brunswick Area 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. Brunswick Area 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.

Brunswick Area Transit is staffed, managed and operated by City of Brunswick staff and its contractors. Brunswick Area Transit serves the City of Brunswick and Glynn County and is, therefore, guided by policy decisions by an inter-governmental policy committee with input from both a technical committee and citizen committee. The three committees (policy, technical and citizen) of the Brunswick Area Transportation Study serve as these committees to Brunswick Area Transit.

The Glynn County Department of Community Development is the designated Metropolitan Planning Organization (MPO) for the Brunswick Urbanized Area. The Brunswick Area Transportation Study (BATS) is the MPO's mechanism for conducting transportation planning and adopting transportation plans and programs (including the Long-Range Transportation Plan and Transportation Improvement Program). The MPO structure includes a policy committee, technical committee and citizen committee. Adopted MPO policies detail the membership and responsibilities of these committees. The current MPO Policy Committee members include:

- Voting members
 - Chair person, Glynn County Board of Commissioners
 - Commissioner, Glynn County Board of Commissioners
 - Mayor, City of Brunswick
 - Commissioner, City of Brunswick
 - Commissioner, Georgia DOT
 - Director of Brunswick/Golden Isles Chambers of Commerce
 - Director of Glynn County Airport Commission
 - Director, Port Planning, Georgia Ports Authority
 - Director, Jekyll Island Authority
- Non-Voting Members
 - County Administrator, Glynn County
 - Glynn County Community Development Director, PC Secretary
 - Chairperson, BATS Citizens Advisory Committee
 - Representative, Federal Highway Administration

As adopted by the MPO in the *BATS Organizational Manual and By-Laws*, the MPO policy committee is responsible to appoint and periodically review membership to the technical committee and citizen committee to ensure that representation is appropriate.

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, Brunswick Area Transit will ensure the following:

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

Brunswick Area Transit has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Brunswick Area Transit does not have any Title VI Equity Analysis reports to submit with this Plan. For future Title VI analyses, Brunswick Area Transit will utilize the demographic maps included in Appendix I or updated versions as new demographic data may become available.

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.

Brunswick Area Transit is a fixed route and paratransit service provider. FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets. Brunswick Area Transit has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.

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. Brunswick Area Transit has prepared standards for mini-bus and 40' standard bus.

a. Vehicle Load

| Vehicle Type | Average Passenger Capacities | | | Maximum Load Factor |
|-------------------------|------------------------------|----------|-------|---------------------|
| | Seated | Standing | Total | |
| 15'-20' Paratransit Van | 8 | 2 | 10 | 1.2 |
| 30' Bus | 28 | 10 | 38 | 1.2 |
| 40' Bus | 39 | 14 | 53 | 1.3 |

b. Vehicle Headway

| POLICY HEADWAYS AND PERIODS OF OPERATION | | | | |
|---|------|------|---------|-------|
| WEEKDAY | Peak | Base | Evening | Night |
| Local | 30 | 60 | 60 | -- |
| Island Shuttle | 30 | 60 | 60 | -- |
| * Peak: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; "--" means no service is provided during that time period. | | | | |

| POLICY HEADWAYS AND PERIODS OF OPERATION | | | | |
|---|------|------|---------|-------|
| SATURDAY | Peak | Base | Evening | Night |
| Local | 60 | 60 | 60 | -- |
| Island Shuttle | 60 | 60 | 60 | -- |
| * Peak: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; "--" means no service is provided during that time period. | | | | |

- c. On-Time Performance
A vehicle is considered on time if it departs a scheduled time point no more than **one (1)** minute early and no more than **five (5)** minutes late. The Brunswick Area Transit on-time performance objective is **90%** or greater. Brunswick Area Transit will monitor on-time performance and system results will be published and posted as part of **annual performance reports** covering all aspects of operations.
- d. Service Availability
Brunswick Area Transit will distribute transit service so that **80%** of all residents in the service area are within a **¼ mile walk of bus service**.

10.2 Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. Brunswick Area Transit has prepared the following policies for its transit system.

- a. Distribution of Transit Amenities
Installation of transit amenities along bus routes are based on the number of passengers boarding at stops and stations along those routes.
- b. Vehicle Assignment
Bus assignments to specific routes will take into account the operating characteristics of buses, which are matched to the operating characteristics of the route. Routes with lower ridership or with physical constraints (tight turning radii, narrow streets, steep grades, etc.) may be assigned smaller buses (such as 30-foot buses) rather than the 40-foot buses.

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

Brunswick Area Transit is the public transportation provider serving the City of Brunswick and Glynn County, Georgia. Our mission is to provide safe, reliable and friendly transportation services to residents, businesses and visitors alike. Brunswick Area Transit operates two fixed transit routes, the Island Connector to St. Simons Island and demand-response (paratransit) services to qualified individuals.

Brunswick Area Transit is operated by the City of Brunswick, in close cooperation with Glynn County. In addition to transit fare revenues, costs are shared between the City of Brunswick, Glynn County, and grants from the Georgia DOT, the Federal Transit Administration, and state human services agencies.

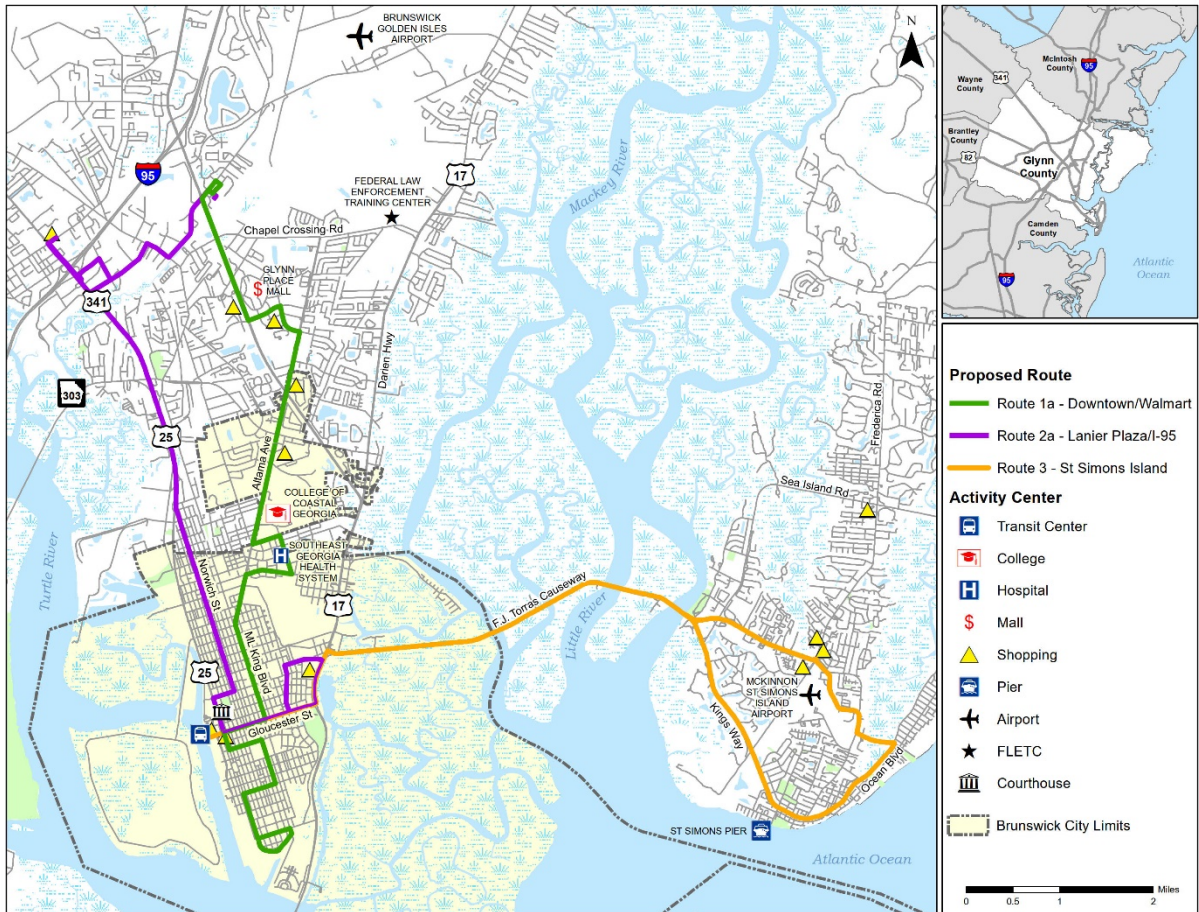
The City of Brunswick owns and maintains the fleet of transit vehicles. Brunswick Area Transit is staffed by employees of the City of Brunswick, with management and oversight both from the City and from an appointed Transit Advisory Board. Brunswick Area Transit staffing includes:

- A full-time Transit Manager, who reports to [REDACTED];
- [REDACTED] full-time or part-time administrative personnel; and
- [REDACTED] drivers and maintenance personnel.

Brunswick Area 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.

Brunswick Area Transit operates transit buses on two fixed routes connecting neighborhoods and businesses in both the City and County, plus the Island Connector between downtown Brunswick and St. Simons Island. In addition, demand-response (paratransit) service provides door-to-door transportation for qualified individuals.

Preliminary Draft Fixed Routes:



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

Brunswick Area Transit

- Brunswick Area 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 Brunswick Area Transit.
- For more information on Brunswick Area Transit's civil rights program, and the procedures to file a complaint, contact XXX-XXX-XXXX, (TTY XXX-XXX-XXXX); email xxxx.xxxx@yourcommunitytransit.gov; or visit our administrative office at 12345 Road, City, Zip Code. For more information, visit yourcommunitytransit.gov.
- If information is needed in another language, contact XXX-XXX-XXXX

The above sentence must also be provided in any language(s) spoken by the LEP population that meet the Safe Harbor threshold.

- 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

Brunswick Area 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"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____ | | | | |
| Date of Alleged Discrimination (Month, Day, Year): _____ | | | | |
| Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____ | | | | |
| Section IV | | | | |
| Have you previously filed a Title VI complaint with this agency? | | | Yes | No |

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

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

Signature and date required below

Signature Date

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

Brunswick Area Transit Title VI Liaison
12345 Address
City, FL Zip

Appendix F

Public Participation Plan (PPP)

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

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

“Some of those effective practices include:

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

With these instructions in mind, please add or remove items from the template as you see fit. The majority of the plan is shown in green text to indicate the flexibility in the plan.

Introduction

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

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

Brunswick Area 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 Brunswick Area Transit website (www.yourcommunitytransit.com) and all feedback on the site will be recorded and passed on to Brunswick Area Transit management. The public will also be able to call the Brunswick Area Transit office at XXX-XXX-XXXX during its hours of operation. Feedback collected over the phone will be recorded and passed on to Brunswick Area 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, Brunswick Area 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

If your agency is required to perform public hearings summarize them in this section. If the agency is not required to perform public hearings state that in this section.

LCB Meetings

Discuss how the agency conducts the LCB meetings in this section.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Brunswick Area Transit operates a transit system within the City of Brunswick and Glynn County. The Language Assistance Plan (LAP) has been prepared to address Brunswick Area 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 Brunswick Area Transit service area there are approximately 2,263 residents or 2.8% who describe themselves as not able to communicate in English very well (source: US Census; 1,609 (2.0%) speak Spanish and the balance speak other languages as listed in Appendix H). Brunswick Area 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. Brunswick Area 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).

It is important for Brunswick Area Transit be able to communicate effectively with all of its riders. When Brunswick Area 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. Brunswick Area 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 identifies the efforts that Brunswick Area 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 Brunswick Area 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 Brunswick Area 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 Brunswick Area Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Brunswick Area Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Brunswick Area Transit to the LEP population.
4. The resources available to Brunswick Area 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**

According to data for U.S. Census’ American Community Survey, of the 79,546 residents in Glynn County over the age of 5 years 73,816 (92.8%) speak only English and 5,730 (7.2%) speak a language other than English. Of those persons that speak a language other than English 3,467 residents (4.4%) also speak English very well whereas 2,263 residents (2.8%) describe themselves as speaking English “less than very well”. Of those who speak English “less than very well” 1,609 (2.0%) speak Spanish and the other 0.8% speak other Indo-European, Asian or Pacific Islander languages.

Outside English, Spanish is the most spoken language in the service area. Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Brunswick Area 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.

Brunswick Area Transit is beginning a new service to the public. However, based on the preliminary routes and the demographic distribution of persons in the service area, it is likely

that LEP individuals speaking Spanish will come in contact with and use the transit system. Supporting demographic maps are provided in Appendix I to support this assessment.

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

Transportation is vital for residents to access opportunities for employment, education, medical services, shopping and social activities. And, 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.

The City of Brunswick and Glynn County recognize the need for public transportation to aid in providing transportation for area residents and businesses. Those needs have been identified in prior transit feasibility studies including the 2009 Brunswick-Glynn Transit Implementation Plan, where community needs are identified including transportation for low-income, minority and seniors. Necessary access to employment opportunities and social services is also identified.

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

Insert in this section information on the language assistance resources available to your agency and their cost. Compare this to the LEP needs in your service area.

Brunswick Area 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: XXXXX, XXXX, and XXXX. Brunswick Area 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.

Brunswick Area Transit may identify language assistance need for an LEP group by:

1. Examining available demographic data such as from the U.S. Census' American Community Survey;
2. 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;
3. Having Census Bureau Language Identification Flashcards available at Brunswick Area Transit Meeting to assist Brunswick Area Transit in identifying language assistance needs for future events and meetings;
4. 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 Brunswick Area Transit management to follow-up.);
5. Surveying vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) on their experience concerning any contacts with LEP persons during the previous year.

Brunswick Area 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, 92.8% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (5.0%). Of those whose primary spoken language is Spanish, approximately 2.0% identify themselves as speaking English "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 only 0.8% of the service area population.

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.

Brunswick Area Transit will undertake the following actions to improve access to information and services for LEP individuals:

1. Make available printed transit schedules and rider information in Spanish as well as English;
2. Ensure that the Brunswick Area Transit web pages are translatable with common web browsers such as Internet Explorer or Google Chrome;
3. Provide bilingual staff (English and Spanish) at public meetings and hearings;
4. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year;

5. Provide Language Identification Flashcards on transit vehicles and in the Brunswick Area Transit offices;
6. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
7. 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.

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 Brunswick Area Transit, the most important staff training is for Customer Service Representatives and transit drivers. The following training will be provided to Customer Service Representatives and drivers:

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

Brunswick Area Transit will make Title VI information available in English and Spanish on the City of Brunswick's website. Key documents are written in English and Spanish. Notices are also posted in Brunswick Area Transit office lobby, on buses, and XXXXXX. 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 Brunswick Area Transit's financial resources are sufficient to fund language assistance resources needed

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.

Brunswick Area Transit service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish speakers qualify for the Safe Harbor Provision as the number of person which speak English "less than very well" is counted as 2.0% and 1,609 persons (which exceeds the 1,000 persons threshold).

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. Brunswick Area 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: Brunswick Area Transit Service Area

Glynn County Languages Spoken

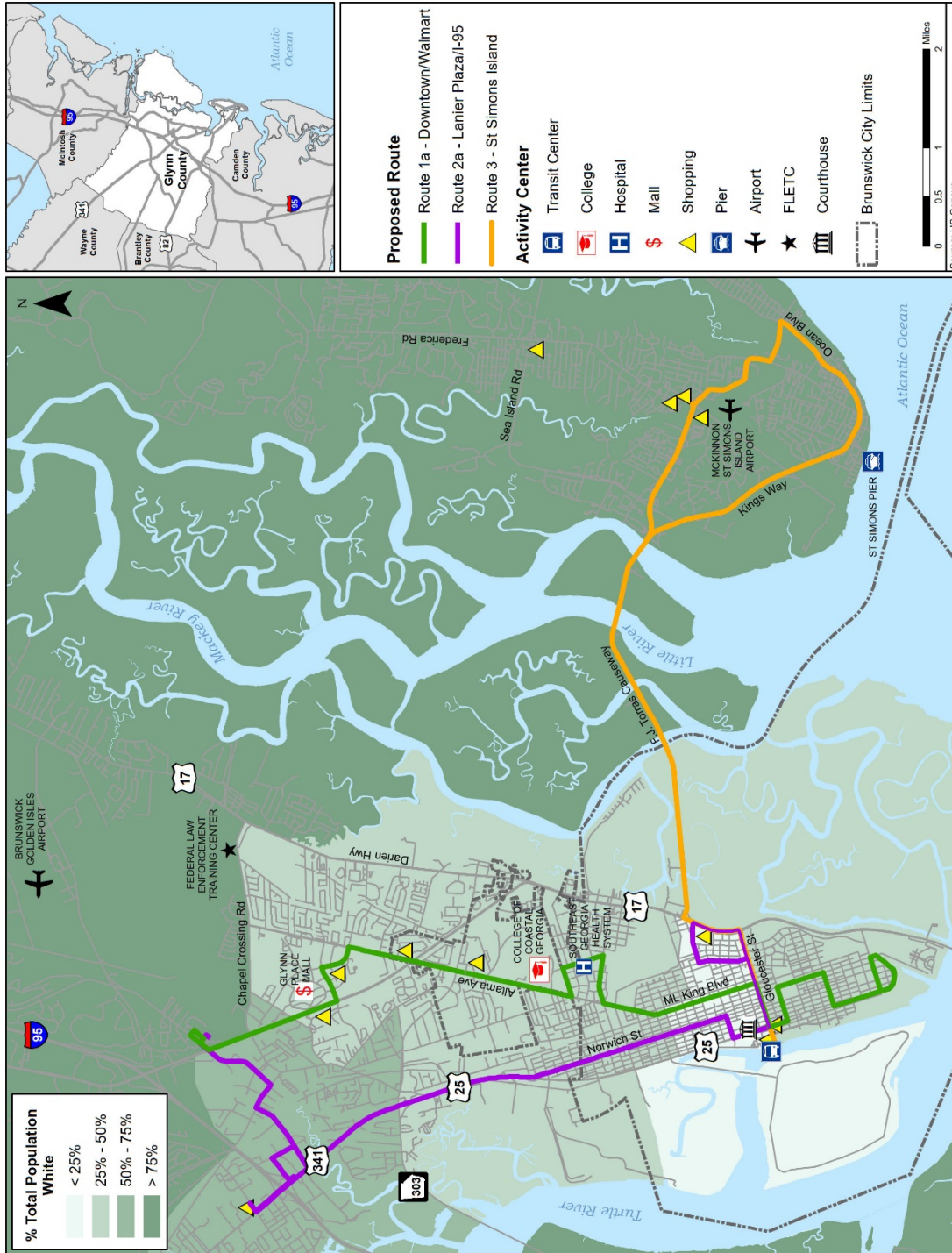
| <u>Language at home</u> | <u>Population (5 years and over)</u> | <u>Percent</u> |
|-------------------------------------|--------------------------------------|----------------|
| Total | 79,546 | 100% |
| Speak only English | 73,816 | 92.8% |
| Other than English | 5,730 | 7.2% |
| Speak English less than “very well” | 2,263 | 2.8% |
| Spanish | 3,943 | 5.0% |
| Speak English less than “very well” | 1,609 | 2.0% |
| Other Indo-European | 1,115 | 1.4% |
| Speak English less than “very well” | 376 | 0.5% |
| Asian and Pacifi Islander | 475 | 0.6% |
| Speak English less than “very well” | 240 | 0.3% |
| Other | 197 | 0.2% |
| Speak English less than “very well” | 38 | 0.0% |

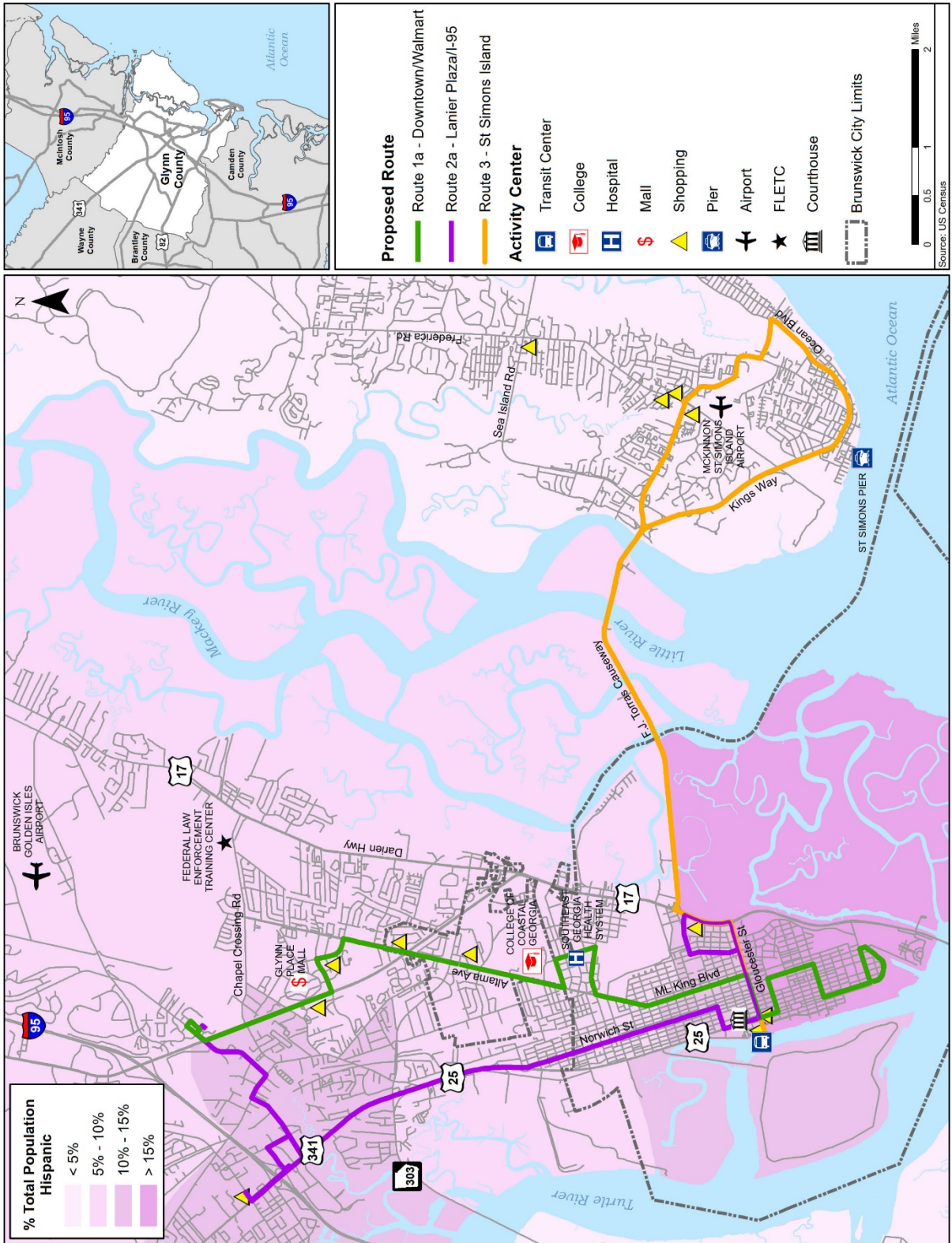
Source: US Census Bureau American Community Survey, Table DP02

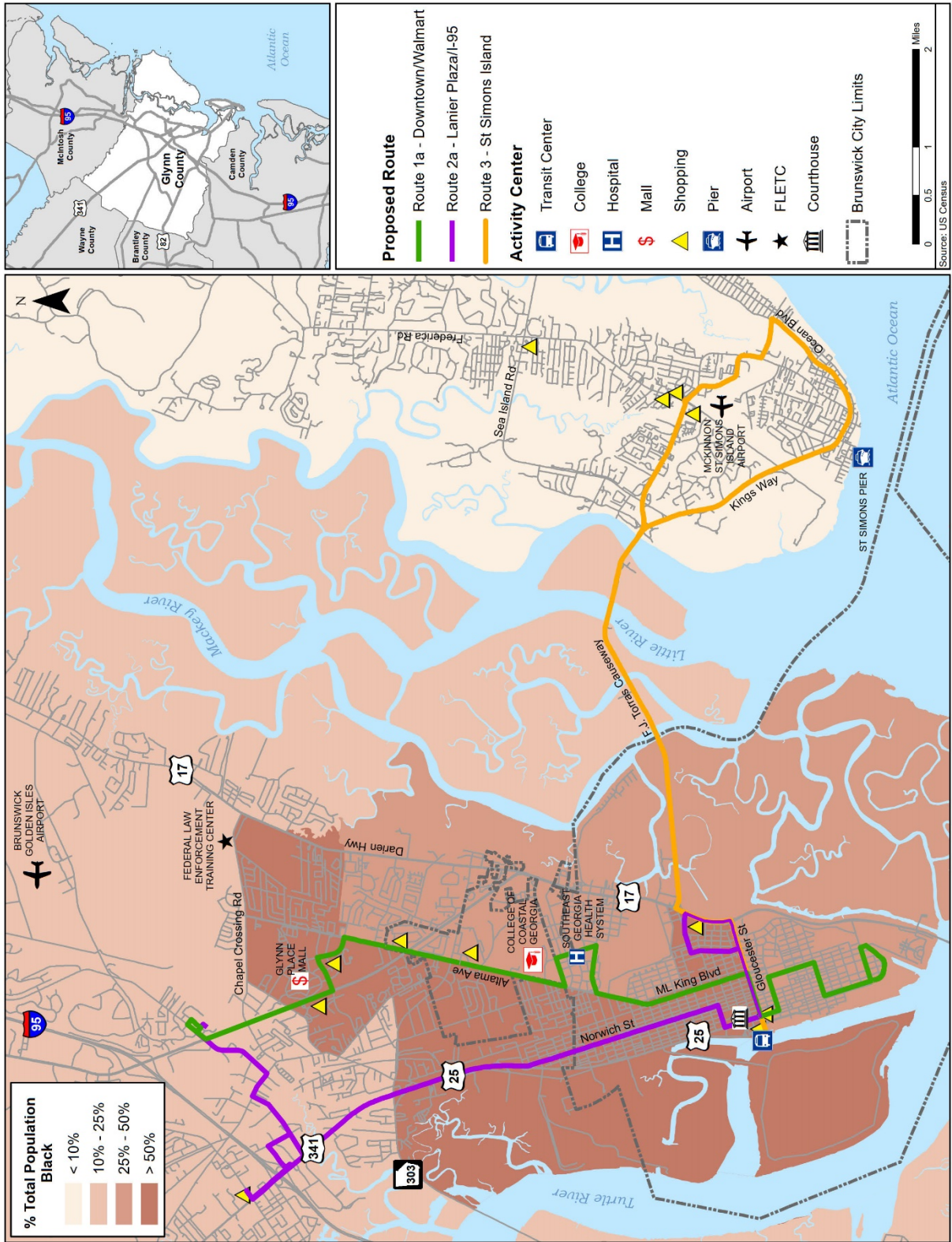
Appendix I

Demographic Maps

Note: Census data for persons with Limited English Proficiency (LEP) in Glynn County is not available for any geography smaller than countywide due to the small size of the survey data. Therefore, the LEP data presented tabularly in this report is not presented on the following demographic maps. The following maps show the spatial distribution of persons by race including % white, % hispanic and % black.







Appendix J

Title VI Equity Analysis

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” Brunswick Area Transit has undertaken any projects requiring land acquisition and the displacement of persons, and has not performed a Title VI Equity Analysis to date.