

Dawson County Board of Commissioners



Title VI Plan

Date Adopted: December 16, 2021



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
05/16/2018	Update	D. Yarbrough	
07/03/2018	Adoption	Dawson Co. BOC	
02/05/2015	Adoption	Dawson Co. BOC	
09/02/2019	Update and Adoption	Dawson Co. BOC	
12/16/2021	Update and Adoption	Dawson Co. BOC	

Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan	1-1
2.0 Introduction & Description of Services	2-1
2.1 First Time Applicant Requirements	2-2
2.2 Annual Certifications and Assurances	2-3
2.3 Title VI Plan Concurrence and Adoption	2-3
3.0 Title VI Notice to the Public	3-1
3.1 Notice to Public	3-1
3.2 Notice Posting Locations	3-1
4.0 Title VI Procedures and Compliance	4-1
4.1 Complaint Procedure	4-1
4.2 Complaint Form	4-1
4.3 Record Retention and Reporting Policy	4-2
4.4 Sub-recipient Assistance and Monitoring	4-2
4.5 Sub recipients and Subcontractors	4-2
5.0 Title VI Investigations, Complaints, and Lawsuits	5-1
6.0 Public Participation Plan	5-1
7.0 Language Assistance Plan	7-1
8.0 Transit Planning and Advisory Bodies	8-1
9.0 Title VI Equity Analysis	9-1
10.0 System-Wide Service Standards and Service Policies	10-1
11.0 Appendices	11-1
APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: DAWSON COUNTY TRANSIT SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

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].

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

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

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

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

Signature:  _____

Printed Name: Billy Thurmond, Dawson County, December 16, 2021
 Executive Director/Signatory Authority, Your Transit System, Date: Month/Day/Year

2.0 Introduction & Description of Services

Dawson County 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.

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

Title VI Liaison

Dawn Johnson- Dawson County Transit Director
Dawson County Board of Commissioners
706-344-3700
201 Recreation Rd.
Dawsonville, GA 30534

Alternate Title VI Contact

Director of Human Resources
Dawson County Board of Commissioners
706-344-3501
25 Justice Way, Suite 2233
Dawsonville, GA 30534

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

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

2.1 First Time Applicant Requirements

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

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

Current and Pending FTA Funding

None

Current and Pending GDOT Funding

1. FY 2022 GDOT 5311 Program, 07/01/2021-06/30/2022, \$132,747.00

Current and Pending Federal Funding (non-FTA)

None

Current and Pending State Funding (non-GDOT)

1. Deanna Specialty Transportation Inc. – FY 2022 Coordinating Transportation, 07/01/2021-06/30/2022- reimbursement basis (budgeted approximately \$50,000), current

GDOT conducted a Risk Assessment of Dawson County within the last three years and no deficiencies were found in the Dawson County VI Program.

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

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

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on February 1, 2022. The Plan was approved and adopted by the Dawson County Board of Commissioners during a meeting held on December 16, 2021. 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 Dawson County 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 Dawson County Transit's office(s) including the reception desk and meeting rooms, and on the Dawson County Government website at www.dawsoncounty.org. Additionally, Dawson County Transit will post the notice at stations, stops and on transit vehicles.

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

4.0 Title VI Procedures and Compliance

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

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

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

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

The complaint procedure will be made available to the public the Dawson County Government website www.dawsoncounty.org

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Dawson County Government's website (www.dawsoncounty.org).

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

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

4.4 Sub-recipient Assistance and Monitoring

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

4.5 Sub recipients and Subcontractors

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

Nondiscrimination Clauses

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

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

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

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with GDOT, Dawson County 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. Dawson County 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 Dawson County Transit shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Dawson County Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Dawson County Transit shall likewise utilize the U.S. Department

of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Dawson County Transit.

5.0 Title VI Investigations, Complaints, and Lawsuits

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

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

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

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

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

Current Outreach Efforts

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

- Dawson County Transit developed a brochure in both English and Spanish that described the system's policies, procedures, and fares.
- Dawson County Transit will continue to speak to civic and community groups in reference to the Transit Department. Transit brochures are left at local health departments and doctor offices. Information is posted on county websites and Facebook.

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).

Dawson County Transit operates a transit system within Dawson County. The Language Assistance Plan (LAP) has been prepared to address Dawson County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Dawson County Transit's service area, there are 363 residents or 1.6% who describe themselves as not able to communicate in English very well (Source: US Census, American Community Survey). Dawson County Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Dawson County Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

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

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

9.0 Title VI Equity Analysis

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

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

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

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

10.0 System-Wide Service Standards and Service Policies

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

Dawson County Transit is not a fixed route service provider, therefore, are not required to provide system-wide service standards and paratransit policies.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
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APPENDIX D	TITLE VI NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: DAWSON COUNTY TRANSIT SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

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

General Requirements

All recipients must submit:

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

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

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

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

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

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.
Dawson County's main goal is to provide public transportation and make sure that each Dawson County Transit Client is served in a timely manner and receives a professional experience. Our department strives to be one of the best coordinated transportation systems in our area.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.
Dawson County Transit is a government agency. Our organization is made up of 5 full-time employees and 3 part-time employees. Our Transit Coordinator is responsible for all of the day-to-day operations of our organization and reports directly to the Transit Director. The Transit Director reports to the County Manager who then reports to the Board of Commissioners. The service hours of operation of the system are Monday through Friday, 8:00 a.m. to 4:00 p.m.
3. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?
Dawson County's Transit Director and Coordinator are responsible for training and management of our transportation program. All safety sensitive employees are required to complete a GDOT approved safety and security training course as part of their new hire orientation. All new employees are required to complete the GDOT PASS training. Dawson County's Board of Commissioners 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 Transit Director's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
4. Who provides vehicle maintenance and record keeping?
Maintenance on all agency vehicles is provided by Dawson County Fleet Maintenance, Chestatee Ford, Hamby's Garage, and National Bus Sales. 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 s document. All vehicle files and driver files are kept on-site at our operations base located at 201 Recreation Road or at the Dawson County Human Resources Office in the Dawson County Government Center, and are maintained by the Dawson County Transit Coordinator. All records are maintained and retained for a minimum of four (4) years.
5. Number of current transportation related employees
Our transportation department has a total of 8 employees that include 5 full-time drivers and 3 part-time drivers. Our safety sensitive maintenance employees include 2 full-time individuals that are assigned to Fleet Maintenance.
6. Who will drive the vehicle, number of drivers, CDL certifications, etc.?
Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All of our drivers have completed GDOT PASS Training.
7. A detailed description of service routes and ridership numbers
Transportation services provided through our program are available to all Dawson County residents. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 25% of the medical trips we provide are to medical facilities out of the county; therefore, our out-of-county services are directed to the nearby

highway corridors that surround this community for optimum efficiency of trip duration and the convenient route. Currently, we use a variety of vehicles to provide passenger services. Our fleet included 4-10 passenger buses with life capability. Four of our vehicles are equipped for wheelchair service. We prioritize grouping trips and multi-loading to the maximum extent possible. We make approximately 50 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

**DAWSON COUNTY BOARD OF COMMISSIONERS
VOTING SESSION MINUTES – DECEMBER 16, 2021
DAWSON COUNTY GOVERNMENT CENTER ASSEMBLY ROOM
25 JUSTICE WAY, DAWSONVILLE, GEORGIA 30534
6:00 PM**

Motion passed 4-0 to come out of Executive Session. Satterfield/Fausett

ROLL CALL: Those present were Chairman Billy Thurmond; Commissioner Sharon Fausett, District 1; Commissioner Chris Gaines, District 2; Commissioner Tim Satterfield, District 3; Commissioner Emory Dooley, District 4; County Manager David Headley; County Attorney Molly Esswein; County Clerk Kristen Cloud; and interested citizens of Dawson County.

INVOCATION: Chairman Thurmond

PLEDGE OF ALLEGIANCE: Chairman Thurmond

ANNOUNCEMENTS:

Chairman Thurmond announced that county offices would be closed December 24 and 27, 2021, for the Christmas holidays and December 31, 2021, for the New Year's holiday.

Chairman Thurmond announced that the next Board of Commissioners meeting would be held January 20, 2022; and, starting in 2022, work and voting sessions will run consecutively, with work sessions beginning at 4 p.m.

Public Affairs Officer Laura Fulcher introduced and displayed a new Dawson County "Connect with Us!" social media outreach card that she said would be made available to the public through numerous community partners.

APPROVAL OF MINUTES:

Motion passed 4-0 to approve an Amendment to the Minutes of the Voting Session held on November 4, 2021. Dooley/Fausett

Motion passed 4-0 to approve the Minutes of the Work Session held on December 2, 2021. Satterfield/Gaines

Motion passed 4-0 to approve the Minutes of the Voting Session held on December 2, 2021. Fausett/Dooley

APPROVAL OF AGENDA:

Motion passed 4-0 to approve the agenda with the following change:

- Addition of another name for consideration for item **c. Tax Assessors** below No. 7 Board Appointments under New Business:
 - Roxanne Howard- *appointment* (Term: January 2022 through December 2026)
- Addition of letters d. and e. below No. 7 Board Appointments under New Business:
 - **d. Industrial Building Authority**
 - i. Gary Coates- *reappointment* (Term: January 2022 through December 2025)

- ii. Brian Trapnell- *reappointment* (Term: January 2022 through December 2025)
- o **e. Planning Commission**
 - i. Jason Hamby- *District 1 reappointment* (Term: January 2022 through December 2022)
 - ii. Seth Stowers- *District 1 Alternate reappointment* (Term: January 2022 through December 2022)
 - iii. Tim Bennett- *District 3 reappointment* (Term: January 2022 through December 2022)
 - iv. Jean Maryanski- *District 3 Alternate reappointment* (Term: January 2022 through December 2022)
- Addition of Nos. 9, 10, 11 and 12 under New Business:
 - 9. Family Connection 2022 Fiscal Agent Request
 - 10. Contract #386-21 – Design Build Services for Two Artificial In-Filled Grass Surfaces Change Order
 - 11. Title and Grade Change for Two Information Technology Employees
 - 12. Updated Title VI Plan and Georgia Department of Transportation Drug and Alcohol Policy for 2022

Fausett/Satterfield

PUBLIC COMMENT:

Jane Graves, Dawsonville, Georgia, said, “As a lake resident, I would highly recommend and ask and plead that you go ahead this evening and vote for a short-term rental agreement. As you well know, a lot of the lake residences are on very small plots of land. We’re exceedingly close together. Our land is about 100 feet by 200 feet so our neighbors are exceedingly close. A lot of our subdivisions are, in fact, older. They have no HOAs. They have no covenants, and so we literally have no protections from whoever decided to invest and rent these properties.” Graves said the county also could lose a large tax base if residents choose to move. “There’s also issues regarding blight, especially with some of the older properties,” she added. “Properties around the lake vary. They aren’t all ‘McMansions.’ Some of them are small residences and they’re not suitable for large parties.” Additionally, she said, “...When you are licensing and enforcing, it’s really important that [it] is done well and promptly because a lot of things get licensed and then they’re not checked on. So, when they are licensed, please take a look at the fact that some of these properties have shared driveways and so they go over other people’s land. There’s a lot of easements.” Graves also noted how busy the lake is, especially in the summer. “I haven’t looked at the statistics for accidents, but I’m sure they’re there,” she said. “If it’s going to turn into a holiday camp out there...you’re going to have a lot more accidents on the lake and a lot more busyness there.”

ALCOHOL:

New Alcohol License (Retail Package Sale of Beer and Wine) – E-Z Buy Kwik Mart
 Motion passed 4-0 to approve a New Alcohol License (*Retail Package Sale of Beer and Wine*) – E-Z Buy Kwik Mart. Dooley/Gaines

ZONINGS:

Chairman Thurmond announced that if anyone contributed more than \$250 to the commissioners or chairman in the past two years and wished to speak they would have to fill out a disclosure

form, which would be made available to them. Under normal program, 10 minutes is given to those who wish to speak in favor of or opposition to with some redirect, time permitting.

ZA 21-21 - Jim King requests to rezone TMP 098-015, 098-016-001 and 098-016-002 from RA (Residential Agriculture) to RS3 (Residential Suburban 3) for the purpose of developing a 379-lot subdivision (Highway 9 South / Goodson Road).

VR 21-08 - Jim King requests a variance to the Dawson County Subdivision Regulations Article X Section 1003.D minimum lot width reduction - TMP 098-015, 098-016-001 and 098-016-002. (Postponed from the November 18, 2021, Voting Session)
(APPLICANT HAS REQUESTED TO WITHDRAW THE APPLICATION.)

Planning & Development Director Sharon Farrell said the applicant requests to withdraw the application.

Motion passed 4-0 to accept a withdrawal request for ZA 21-21 and VR 21-08. Fausett/Dooley

SU 21-07 - Greg Spence on behalf of Verizon Wireless requests a special use of TMP 049-001 for the purpose of placing a telecommunications tower (Highway 52 East).

VR 21-19 - Greg Spence on behalf of Verizon Wireless requests a variance to the Dawson County Land Use Resolution Article IV Section 410 F.4.

Planning & Development Director Sharon Farrell said the applicant reports that the variance is no longer needed as part of the application. "They were able to adjust the location on the property," she said. Farrell said the Planning Commission recommended denial of the application. She noted that a balloon test was conducted on November 1, 2021.

Attorney David Kirk, partner at Troutman Pepper, Atlanta, Georgia, provided telecommunication statistics and presented a PowerPoint presentation. "...Verizon Wireless is proposing a telecommunication tower that's capable of hosting four carriers, as your ordinance requires," he said. "It's located on a 59-acre portion of a 98-acre tract on Highway 52 East near Wesley Chapel Road, and it's intended to improve the service in that vicinity. We've asked for a special use permit for the tower itself. At the Planning Commission, there was a lot of discussion about the location of the tower, and we were requested by folks who were there to see if we could move it further back into the site. We've been able to do that and...with the removal of that variance requirement, we meet all the requirements that are in your ordinance." Kirk added, "...I think we've demonstrated through the materials we've provided tonight and submitted for the record that this site will significantly improve coverage and enhance the quality of service to folks who rely on their wireless devices for business. It will help first responders. It will help the general public in the area as well as residents. We've moved that tower back that 300 feet...in a good-faith effort to respond to the concerns of the community, and we now fully meet all your ordinance requirements."

Applicant Greg Spence discussed the balloon test. "The requirement is for a single hour," he said. "That's what's required by your ordinance, but we left it up for longer while we were going around and taking the photo simulations and everything else...but the zoning ordinance calls for a single hour."

Chairman Thurmond opened the hearing by asking if there was anyone present who wished to speak either for or against the application.

None spoke in favor of the application.

The following spoke in opposition of the application:

- Joel Crotzer, Dawsonville, Georgia
- Larry Kollar, Dawsonville, Georgia
- Patricia Bearden, Dawsonville, Georgia
- Shane Turner, Dawsonville, Georgia

Chairman Thurmond asked if there was anyone else present who wished to speak on the application and, hearing none, closed the hearing.

Motion was made by Commissioner Satterfield to deny the application, but the motion died for lack of a second.

Motion passed 3-1 to table SU 21-07 and VR 21-19 until February 3, 2022, and until such time the applicant performs a balloon test for a minimum of four hours and provides notification to the Board of Commissioners to allow the board to physically be on site to see the balloon, as well as to allow concerned area residents to see the balloon. Gaines/Fausett- Commissioner Satterfield opposed the motion

ZA 21-22 - Redo Properties LLC requests to rezone TMP 094-044 from RSR (Residential Sub-Rural) to RMF (Residential Multi-Family) for the purpose of bringing a non-conforming use into zoning compliance (Reeves Road).

Planning & Development Director Sharon Farrell said the nearly 9-acre parcel is just off Highway 9. "It's been out there since the late '80s," she said. "It is basically multi-family housing and it's being rezoned to bring it into compliance from a zoning standpoint. Farrell said the Planning Commission recommended approval of the application.

Rex Gravitt said he is a managing member of Redo Properties and that he has owned the property for several years. He said the housing was built "before there were any zoning regulations, and I really didn't even realize it wasn't zoned until I was trying to refinance the property and the mortgage company said they did a Phase 1 study on it and they came back and said the property wasn't zoned. ...So, basically, I'm just trying to re-zone it to protect my investment." Gravitt said he does not intend to expand the 27-unit residential property.

Chairman Thurmond opened the hearing by asking if there was anyone present who wished to speak either for or against the application and, hearing none, closed the hearing.

Motion passed 4-0 to approve ZA 21-22. Satterfield/Gaines

UNFINISHED BUSINESS:

Consideration of a Proposed Short-Term Rental / Bed and Breakfast Establishment Ordinance (Tabled from the December 2, 2021, Voting Session, at which time a public hearing was held)

Motion passed 4-0 to approve a Proposed Short-Term Rental / Bed and Breakfast Establishment Ordinance, with some revisions discussed during the meeting. Fausett/Gaines

NEW BUSINESS:

Consideration to Move Forward to a Public Hearing for an Ordinance Amending Chapter 30 of the Code of Dawson County to Establish a Mechanism Whereby County Residents May Petition the Board of Commissioners for the Creation of Special Tax Districts to Fund Capital Improvement Projects

Motion passed 4-0 to approve to Move Forward to a Public Hearing for an Ordinance Amending Chapter 30 of the Code of Dawson County to Establish a Mechanism Whereby County Residents May Petition the Board of Commissioners for the Creation of Special Tax Districts to Fund Capital Improvement Projects. Satterfield/Fausett

Consideration of New Agreement with Professional Probation Services Inc.

Motion passed 4-0 to approve a New Agreement with Professional Probation Services Inc. Dooley/Gaines

Consideration of Compensation of Court Bailiffs

Motion passed 4-0 to approve Compensation of Court Bailiffs (funds budgeted in the FY 2022 budget). Satterfield/Gaines

Consideration of Request for Approval of FY 2022 State Public Defender Contract

Motion passed 4-0 to approve a Request for Approval of a FY 2022 State Public Defender Contract. Fausett/Dooley

Consideration of Request for Approval of FY 2022 Public Defender Intergovernmental Agreement Between Dawson and Hall Counties

Motion passed 4-0 to approve a Request for Approval of a FY 2022 Public Defender Intergovernmental Agreement Between Dawson and Hall Counties. Satterfield/Gaines

Consideration of Request to Apply for Grant for Generator at Rock Creek Park

Motion passed 4-0 to approve a Request to Apply for a Grant for a Generator at Rock Creek Park. Gaines/Fausett

Consideration of Board Appointments:

- **Joint Development Authority and Development Authority of Dawson County**
 - Carroll Turner- replacing Betsy McGriff and Calvin Byrd, respectively (Terms: January 2022 through December 2022)

Motion passed 4-0 to approve the appointment of Carroll Tuner to the Joint Development Authority and the Development Authority of Dawson County for terms of January 2022 through December 2022. Gaines/Satterfield

- **Parks & Recreation**

- Christopher Conowal- reappointment (Term: January 2022 through December 2025)

Motion passed 4-0 to approve the reappointment of Christopher Conowal to the Parks & Recreation board for a term of January 2022 through December 2025. Dooley/Fausett

- **Tax Assessors**

- Andrea McKenzie- reappointment; or Roxanne Howard- appointment (Term: January 2022 through December 2026)

Motion passed 4-0 to approve the appointment of Roxanne Howard to the Tax Assessors board for a term of January 2022 through December 2026. Fausett/Satterfield

- **Industrial Building Authority**

- Gary Coates- reappointment (Term: January 2022 through December 2025)
- Brian Trapnell- reappointment (Term: January 2022 through December 2025)

Motion passed 4-0 to approve the reappointments of Gary Coates and Brian Trapnell to the Industrial Building Authority for terms of January 2022 through December 2025. Gaines/Dooley

- **Planning Commission**

- Jason Hamby- District 1 reappointment (Term: January 2022 through December 2022)
- Seth Stowers- District 1 Alternate reappointment (Term: January 2022 through December 2022)
- Tim Bennett- District 3 reappointment (Term: January 2022 through December 2022)
- Jean Maryanski- District 3 Alternate reappointment (Term: January 2022 through December 2022)

Motion passed 4-0 to approve the reappointment of the following to the Planning Commission for terms of January 2022 through December 2022: Jason Hamby, District 1; Seth Stowers, District 1 Alternate; Tim Bennett, District 3; and Jean Maryanski, District 3 Alternate. Dooley/Satterfield

Consideration of 2022 Board of Commissioners Vice Chair Appointment

Motion passed 4-0 to approve the reappointment of District 4 Commissioner Emory Dooley as the 2022 Board of Commissioners Vice Chair. Gaines/Fausett

Family Connection 2022 Fiscal Agent Request

Motion passed 4-0 to approve a Family Connection 2022 Fiscal Agent Request. Fausett/Gaines

Contract #386-21 – Design Build Services for Two Artificial In-Filled Grass Surfaces Change Order

Motion passed 4-0 to approve Contract #386-21 – Design Build Services for Two Artificial In-Filled Grass Surfaces Change Order; to approve a not to exceed amount of \$369,061 for additional work required for the project. Funds will come from impact fees. Gaines/Satterfield

Title and Grade Change for Two Information Technology Employees

Motion passed 4-0 to approve a Title and Grade Change for Two Information Technology (IT) Employees; Will Shattuck will become assistant IT director and Cameron Burt will become senior network engineer, and pay grade adjustments totaling \$17,268.54 will come from General Fund's fund balance. Satterfield/Fausett

Updated Title VI Plan and Georgia Department of Transportation Drug and Alcohol Policy for 2022

Motion passed 4-0 to approve an Updated Title VI Plan and Georgia Department of Transportation Drug and Alcohol Policy for 2022. Dooley/Gaines

PUBLIC COMMENT:

None

ADJOURNMENT:

APPROVE:

ATTEST:

Billy Thurmond, Chairman

Kristen Cloud, County Clerk



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

February 1, 2022

Lee Adkins
Dawson County
201 Recreation Rd
Dawsonville, GA 30534

Dear Mr. Atkins,

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

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Jihyun Park, Transit Compliance and Asset Manager at jpark@dot.ga.gov or (404)-631-1235.

Sincerely,

**Patricia
Smith**

Digitally signed by
Patricia Smith
Date: 2022.02.04
10:19:20 -05'00'

Patricia Smith
Transit Program Manager
Division of Intermodal

Appendix D

Title VI Notice to Public

Notifying the Public of Rights Under Title VI**Dawson County Transit**

- Dawson County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Dawson County Transit.
- For more information on the Dawson County Transit Civil rights program, and the procedures to file a complaint, contact 706-344-3700, email djohnson@dawsoncounty.org, or visit our administrative office at 25 Justice Way, Dawsonville, GA 30534. For more information, visit www.dawsoncounty.org
- If information is needed in another language contact 1-800-752-6096.
- Dial **7-1-1** or **1-800-255-0056** to reach Georgia Relay for TTY Assistance.
- Si se necesita información en otro idioma, comuníquese al 706-344-3501
- 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



DAWSON COUNTY BOARD OF COMMISSIONERS

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to Dawson County Human Resources, 25 Justice Way, Suite 2233, Dawsonville, GA 30534.

1. Complainant’s Name: _____

2. Address: _____

3. City, State and Zip Code: _____

4. Telephone Number (home): _____ (other): _____

5. Person discriminated against (if someone other than the complainant)

Name: _____

Address: _____

City, State, and Zip Code: _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

a. Race/Color

b. National Origin

c. Other

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes No

If yes, check all that apply:

- Federal Agency Federal Court State Agency State Court
- Local Agency

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

Name: _____

Address: _____

City, State & Zip Code: _____

Telephone Number: _____

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

Complainant's Signature

Date _____

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

Dawn Johnson, Dawson County Title VI Liaison
201 Recreation Rd.
Dawsonville, GA 30534

Complaint Form in Spanish



JUNTA DE COMISIONADOS DEL CONDADO DE DAWSON

Formulario de queja del Título VI

El Título VI de la Ley de Derechos Civiles de 1964 exige que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de la participación, se le nieguen los beneficios o sea objeto de discriminación en virtud de cualquier programa o actividad que recibe asistencia financiera federal".

Nota: La siguiente información es necesaria para ayudarnos a procesar su reclamo. Si necesita ayuda para completar este formulario, háganoslo saber.

Complete y envíe este formulario a Dawson County Human Resources, 25 Justice Way, Suite 2233, Dawsonville, GA 30534.

1. Nombre del demandante: _____

2. Dirección: _____

3. Ciudad, estado y código postal: _____

4. Número de teléfono (casa): (otro): _____

5. Persona discriminada (si alguien más que el demandante)

Nombre: _____

Dirección: _____

Ciudad, estado y código postal: _____

6. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación? Fue por tu:

a. Carrera / Color

b. Origen nacional

c..Otro

7. ¿En qué fecha tuvo lugar la supuesta discriminación? _____

8. En sus propias palabras, describa la supuesta discriminación. Explica qué sucedió y quién crees que fue el responsable. Utilice el reverso de este formulario si necesita espacio adicional.

9. ¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local? o con cualquier tribunal federal o estatal? Si _____ No _____

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal

Corte Federal

Agencia Estatal

Tribunal Estatal

Agencia local

10. Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre: _____

Dirección: _____

Ciudad (*): Estado (*): Código postal: _____

Número de teléfono: _____

11. Por favor firme abajo. Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo.

Firma del demandante

Fecha

Appendix F

Public Participation Plan (PPP)

Introduction

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

Public Participation Goals

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

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

Public Participation Methods

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

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

The public will be invited to provide feedback on the Dawson County website (www.dawsoncounty.org) and all feedback on the site will be recorded and passed on to Dawson County Transit management. The public will also be able to call the Dawson County Transit office at 706-344-3603 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Dawson County Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

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

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

Public Hearing

Our agency is required to hold public hearings when applicable.

LEP Meetings

Dawson County Transit will conduct LEP meetings as appropriate with passengers, employers, organizations, and committees as needed. Included in these meetings will be discussion and public input on service quality, the distribution of information, and any proposed changes. The public will be asked to provide feedback to Dawson County Transit on ways to improve communication problems and public awareness. Any meetings will be held at a facility that is accessible for persons with disabilities and served by Dawson County Transit.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Dawson County Transit operates a transit system within Dawson County, Georgia. The Language Assistance Plan (LAP) has been prepared to address Dawson County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Dawson County Transit's service area there are 363 residents or 1.6% who describe themselves as not able to communicate in English "very well" (Source: US Census). Dawson County Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Dawson County Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

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

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

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

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

- Translation: Providing timely translation of important documents
- Staffing: Identifying Dawson County Transit staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

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

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

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

Of the 23,221 residents in the Dawson County Transit service area 363 residents describe themselves as speaking English less than “very well”. People of Hispanic or Latino descent are the primary LEP persons likely to utilize Dawson County Transit services. For the Dawson County Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 98.4% speak English “very well”. For groups who speak English “less than very well”, 1.08% speak Spanish and 0.17% speak Russian, Polish, or an other Slavic language.

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

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

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

Dawson County 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 the Dawson County Transit Service Area has a lack of a prominent LEP group. Phone inquiries and staff survey feedback indicated that Dawson County Transit dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 10 years, Dawson County Transit has had 0 requests for translated documents.

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

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

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

Dawson County Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. Dawson County will make use of language resources at the point in time when surveys, census data, or service requested identify LEP populations wishing to access Transit services.

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.

Dawson County Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 98.4% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (3.69%). Of those whose primary spoken language is Spanish, approximately 1.08% 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 0.52% of the service area population.

Dawson County Transit may identify language assistance need for an LEP group in the future 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 Dawson County Transit Meetings. This will assist Dawson County Transit in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Dawson County Transit management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

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

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

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

1. Verbally survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
2. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

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

c. Element 3: Training Staff

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

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

In the case of Dawson County Transit, the most important staff training is for Customer Service Representatives and transit drivers.

The following training will be provided to Customer Service Representative:

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

d. Element 4: Providing Note to LEP Persons

Dawson County Transit will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Dawson County Transit's office lobby, and buses. 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 annually as needed. 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 Dawson County Transit's financial resources are sufficient to fund language assistance resources needed
- New census data
- Customer and dispatch surveys
- Change in conditions
- Additional Outreach Measures

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

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such

action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Dawson County Transit's 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. Dawson County Transit may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H

Operating Area Language Data:

Dawson County Transit Service Area

Language	County	Percent of Population
Total	23,221	
Speak only English	22,059	.9590
Spanish or Spanish Creole	857	.0320
Speak English "very well"	605	.0225
Speak English less than "very well"	252	.0095
French (incl. Patois, Cajun)		
Speak English "very well"		
Speak English less than "very well"		
French Creole		
Speak English "very well"		
Speak English less than "very well"		
Italian		
Speak English "very well"		
Speak English less than "very well"		
Portuguese or Portuguese Creole		
Speak English "very well"		
Speak English less than "very well"		
German		
Speak English "very well"		
Speak English less than "very well"		
Yiddish		
Speak English "very well"		
Speak English less than "very well"		
Other West Germanic languages		
Speak English "very well"		
Speak English less than "very well"		
Scandinavian languages		
Speak English "very well"		
Speak English less than "very well"		
Greek		
Speak English "very well"		
Speak English less than "very well"		
Russian		
Speak English "very well"		
Speak English less than "very well"		
Polish		
Speak English "very well"		
Speak English less than "very well"		
Serbo-Croatian		
Speak English "very well"		