

Bartow County Public Transportation System

Title VI Plan



Adopted 3-11-2015

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INTRODUCTION

Bartow County, Georgia 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.

The following sections provide a summary of the County's activities relating to those requirements.

As a sub-recipient of Federal Transit Administration (FTA) funds, providing public transit services to the incorporated and unincorporated areas of Bartow County, the Bartow County Commissioner is required to submit a Title VI compliance report to the FTA Region office every three years. This document highlights the County's efforts with regards to the Title VI compliance for its transit service. Annual updates are required by the FTA.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. Presidential Order 12898 addresses environmental justice in minority and low-income populations. To address these federal requirements, Bartow County has developed a Title VI Plan and will take reasonable steps to provide Limited English Proficiency (LEP) persons with meaningful access to services and programs that is not unreasonably restricted, inferior or substantially delayed as compared to others. At such time as it is determined that a person using any service or program provided by the County is an LEP customer, the County will make every reasonable effort to obtain an interpreter either live or via telephone for that person.

In accordance 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, Bartow County is required to 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 the Title VI requirements;
- Attend training on the Title VI and other non-discrimination 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 the 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.

Bartow County Title VI Liaison:

Ms. Sandra Southern

Bartow County Human Resources Department

135 W. Cherokee Avenue, Ste. 217-B

Cartersville, GA 30120

Bartow County Alternate Title VI Liaison:

Ms. Marla Coggins

Bartow County Human Resources Department

135 W. Cherokee Avenue, Ste. 217-B

Cartersville, GA 30120

NOTICE TO THE PUBLIC – POLICY STATEMENT

Bartow County assures that no person shall, on the grounds of race, color, national origin or gender as provided by 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, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity of Bartow County Government, whether or not those programs and activities are federally funded.

Bartow County's goal is not to discriminate against any person with respect to any County transit program or service. This commitment is incorporated into all public outreach efforts to engage in all segments of the population in the transportation planning process. Bartow County actively provides information regarding its Title VI obligations to the public using a variety of methods. Information, such as references to FTA and the Bartow County Title VI and LEP programs and complaint procedure is available upon request at the Transit office, the Bartow County Commissioner's office and on the website. The Bartow County Notice of Non-Discrimination Policy is included in all transit contracts, public meetings and bid advertisements.

Bartow County staff are educated on the Title VI requirements, including how to assist a person who has limited English proficiency. The FTA non-discrimination clauses are included in all consultant contracts and sub-grantee agreements. The Title VI Notice is shown in Appendix A and posted at the Frank Moore Administration and Judicial Center, on the website, at the Transit Office and on all County transit buses.

TITLE VI COMPLAINT PROCESS AND PROCEDURES

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Bartow County Government may file a Title VI complaint by completing and submitting a Title VI Complaint Form (Appendix B). The County investigates complaints received no more than 180 days after the alleged incident. The County will process complaints that are complete. Once the complaint is received, the County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by our office.

The County has 10 business days to investigate the complaint. If more information is needed to resolve the case, the County may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the County 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, he/she 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 no Title VI violation found and that the case will be closed. An LOF summarizes the allegations and any interviews conducted regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member or other action will be taken. The complainant has thirty (30) days after the date of the Letter of Finding to appeal the decision.

A complaint may also be filed directly to the Federal Transit Administration, FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

Bartow County maintains a file for all Title VI complaints, investigations and lawsuits. Bartow County further concludes that there have been no known investigations, complaints or lawsuits filed against the County in the last five years.

Record of Title VI Complaints, Lawsuits and Investigations				
Case #	Date Received	Complaint	Status	Summary of Review and Action Taken
Complaints				
1)				
2)				
Lawsuits				
1)				
2)				
Investigations				

1)
2)

PUBLIC PARTICIPATION

Bartow County seeks out and considers viewpoints of all persons, including low-income, minority, elderly, disabled, Limited English Proficiency (LEP), ethnic and religious groups in the course of conducting public outreach and involvement activities in regards to transit activities. The County utilizes the County organ and the County website to achieve this objective. The County has no plans to pursue social media as a means to expand its public outreach efforts at this time.

Public Outreach methods or activities include:

Website: Bartow County includes information on its website regarding transit activities and the Title VI Plan.

Public Meetings and Hearings: Public meetings and hearings are advertised in an appropriate amount of time through the County organ, the website and public postings to provide citizens an opportunity to participate. All notices include Title VI information and includes contact information for those requesting assistance under the provisions of the Title VI Plan.

County Organ: Notices of public meetings and hearing, as well as other activities and services provided by Bartow County are publicized in the County organ.

Surveys: In an effort to determine how to better serve the overall needs of the public, the Bartow County Transit System conducts in-house surveys of riders of the transit system, using data provided through the transit system passenger trip logs. Special needs of all passengers are considered and every effort is made to accommodate the passengers within the guidelines of the Transit System Policies and Procedures.

SUMMARY OF OUTREACH EFFORTS

Throughout the year we transport elderly citizens to the Senior Center so they can participate in many different types of health education, exercise activities and hobbies.

The Bartow County Transit System provides meal delivery and transportation services to and from the Bartow County Senior Center to low income elderly citizens, delivering approximately 1,200 meals each month.

In the event that the Transit System should make any changes to its operating schedule or service areas, a notice will be provided to the public through local media outreach.

LANGUAGE ASSISTANCE PLAN

In an effort to provide access to the County's transit programs and services to citizens with language barriers, Bartow County utilizes a Language Assistance Plan (LAP). The Bartow County Language Assistance Plan serves as a guide for staff on how to recognize individuals who may need language assistance and how to provide that assistance. The Plan, attached hereto as Exhibit C, was developed pursuant to guidelines provided by the Georgia Department of Transportation.

MEMBERSHIP OF NON-ELECTED COMMITTEES & COUNCILS

Bartow County has no transit related committees. All decisions relating to the Transit Service are made by the Sole Commissioner of Bartow County.

MONITORING OF SUBRECIPIENTS

Bartow County does not have any sub-recipients of Transit Services.

Should the County have sub-recipients, the following monitoring mechanisms would apply:

- Yearly service surveys of riders/customers
- Periodic unannounced inspections/visits of the system routes and facilities
- A review of the contractors published Title VI policy
- Bartow County will review any complaint made by a citizen against the sub-recipient to ensure necessary and appropriate action is taken

To ensure these tasks are completed, a log will be maintained and made available upon request.

DETERMINATION OF SITE OR LOCATION OF FACILITIES

Bartow County has not constructed any transit related facilities with FTA funding.

RESOLUTION FOR APPROVAL OF TITLE VI PLAN

Attached as Appendix D is a copy of the executed Resolution of the Bartow County Commissioner adopting the County's Title VI Plan.

SERVICE STANDARDS (FOR SYSTEMS UNDER 50 VEHICLES)

A. List of types of vehicles (non-fixed route).

Vehicle Type	Quantity	# of Wheel Chairs	# of Seats
Goshen E 350 Series	5	5	10
Goshen E 350 Series	4	0	13
Town and Country Van	1		5
Ford Econoline Van	1		7

B. Vehicle Headway Standards

The Bartow County Transit Service operates throughout the County starting at 7:00 a.m. until 4:30 p.m., Monday through Friday. Demand response service operates based upon the scheduling of trips based upon rider need.

Scheduling involves at least a 24-hour notice, must be a County resident and within our hours of operation.

C. On-time Performance Standards

The on-time performance objective of the Bartow County Transit Service for demand response service is 95% or greater. A Transit vehicle is considered on time if it departs for a scheduled trip no more than five (5) minutes late or departs from a scheduled timepoint no more than five (5) minutes late.

Monitoring of standards is performed through the monthly operation report prepared by the Transit Operator.

D. Service Availability Standards (for each mode)

Bartow County’s service availability for demand response service is determined by Federal Regulations.

Bartow County will distribute its transit service to all residents in the County.

Service Policies (for Systems Under 50 Vehicles)

A. Vehicle Assignment for Each Mode

Bartow County does not assign vehicles to routes or types of service based upon vehicle age or other factors. The assignment is made based upon ridership demands. Demand response vehicles are assigned by the size of the vehicle for the services needed.

TITLE VI
APPENDIX A
NOTICE TO THE PUBLIC

TITLE VI – NOTICE TO THE PUBLIC

Bartow County operates its programs and services without regard to race, color, national origin, age, sex, religion, disability, familial or income status. Any person who believes he or she has been subjected to any unlawful discriminatory practice under Title VI may file a complaint with the Bartow Transit Director or the Bartow County Human Resources Director.

Any person who believes that he or she has been subjected to discrimination or retaliation from Bartow County's administration of federally funded programs may file a written complaint. Note: If the person filing a complaint believes he or she has been discriminated against by any other branch of Bartow County Government, they are directed to contact the Bartow County Human Resources Department at 770-387-5020. All written complaints received by the County are referred immediately to the GDOT's Title VI Coordinator for processing in accordance with approved State procedures.

Written complaints or questions may be sent to:

Bartow County Human Resources
135 W. Cherokee Avenue
Suite 217-B
Cartersville, Georgia 30120

If information is needed in another language or accessible in another required format, please contact us at the above phone number and assistance will be provided.

Si necesita informacion en otro idioma o accesibles en otro format requerido, por favor contacte con nosotros en el numero de telefono arriba y se prestara asistencia.

TITLE VI APPENDIX B

COMPLAINT FORM

BARTOW COUNTY 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 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

TITLE VI APPENDIX C

LANGUAGE ASSISTANCE PLAN

BARTOW COUNTY



LANGUAGE ASSISTANCE PLAN

BARTOW COUNTY HUMAN RESOURCES

135 W. CHEROKEE AVENUE

SUITE 217-B

CARTERSVILLE, GEORGIA 30120

Phone: (770) 387-5020

Fax: (770) 387-5019

www.bartowga.org

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Dissemination of the County's LEP Plan

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LAP APPENDIX C Discrimination Complaint Procedure

LAP APPENDIX D Notice to Grant and Program Recipients

Introduction

Bartow County Government operates a Transit System within both the incorporated and unincorporated areas of Bartow County. The Language Assistance Plan (LAP) has been prepared to address Bartow County Transit System'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 classified as LEP. In the Bartow County Transit System service area there are approximately 3,268 individuals or 47.3% of the County's population of individuals that speak a language other than English, who describe themselves as ***not*** able to communicate in English "very well" (Source: US Census data). The Bartow County Transit System is federally mandated under Executive Order # 13166 to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Bartow County Transit System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The purpose of this limited English Proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. The Plan was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et. seq.** The implementing regulations of the Plan provide that no person shall be subjected to discrimination on the basis of race, color or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency", reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the County, private and non-profit entities and sub-recipients.

Plan Summary

Bartow County has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to County programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English.

The plan details the procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future plan updates.

In developing the plan, while determining the County's extent of obligation to provide LEP services, the County considered the following data: 1) The number or proportion of LEP persons eligible in the County to be served or likely to encounter a County program, activity or service; 2) the frequency with which LEP individuals come in contact with a County program; 3) the nature and importance of the program, activity or service provided by the County to the LEP population; and 4) the resources available to the County and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

1. The number or proportion of LEP persons eligible to be served or likely to encounter a County program, activity or service.

The County examined the US Census Bureau's 2008-2012 American Community Survey (ACS) data and was able to determine that approximately 6.9% or 6,988 of the Bartow County population age 5 and older spoke a language other than English at home.

As the ACS survey indicates 6.0% or 5,661 of Bartow County's population speak Spanish or Spanish Creole, 0.6% or 531 speak other Indo-European languages, 0.2% or 226 speak Asian and Pacific Island languages and 0.1% or 69 speak Other languages.

Of the 6.0% of the persons that speak Spanish or Spanish Creole, approximately 50.1% speak English "very well" and 49.9% speak English less than "very well".

2. The frequency with which LEP individuals come in contact with a County program, activity or service.

The County documents the frequency at which staff has contact with LEP persons. This includes phone inquiries and public meetings attendees. Since the last update, the County has recorded no requests for an interpreter in any language and no requests for translated County documents.

3. The nature and importance of the program, activity or service provided by the Recipient to People’s lives.

With a moderate concentration of Spanish speaking persons in Bartow County, efforts will be made to evaluate the need for any formal outreach efforts to identify County programs that would be of importance to a Spanish-speaking LEP person.

If the County so determines a need to evaluate further outreach efforts, an on-board passenger survey will be conducted to collect data on usage of and access to the Bartow County Transit system.

4. The resources available to the County and overall costs.

Bartow County Transit System assessed its available resources that could be used for Providing LEP assistance to its public transportation users if the need is determined:

- | | | |
|---|---|---|
| 1. Language Line Interpreter Services for other than English speaking individuals | - | Approximately \$3.95 per minute
Language Line 800-752-6096 |
| 2. “I Speak” Cards | - | No cost (access on-line) |
| 3. Access to a Spanish Speaking Interpreter | - | When needed, \$20/hour |

Element 1: Identifying LEP Individuals who Need Language Assistance

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and event to anticipate the possible need for assistance at upcoming meetings;
- Having Census Bureau Language Identification flashcards available at Bartow County Transit system office. This will assist Bartow County in identifying language assistance needs for future events and meetings.
- Having Census Bureau language identification flashcards on all transit vehicles to assist operators to identify specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Bartow County Transit system management to follow up.
- 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.

Element 2: Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. If the required language is not available or if a formal interpretation is required, staff shall use the telephone interpreter service, Language Line, at 1-800-752-6096, said service is available 24 hours a day, 7 days a week. The following County documents are currently available in Spanish: the Title VI Discrimination Complaint Form.

Element 3: Training Staff

All Bartow County Transit staff will be provided a copy of the LEP Plan and will be educated on procedures and services available. This information will also be a part of the County staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities;
- Use of LEP “I Speak” cards;
- How to access an interpreter (in person or via telephone);
- Documentation of language assistance requests;
- How to handle a complaint

Element 4: Providing Notice of Available Language Service to LEP Persons

Bartow County has provided a language translator tool on its website and will post appropriate signage that language assistance is available in County buildings, transit vehicles and other public places.

Outreach Techniques:

- If staff knows they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, have meeting notices printed in an alternative language, such as Spanish.
- When running a general public meeting notice, staff should insert the clause, “**Un traductor del idioma español estara disponible**”. This means “A Spanish translator will be available”. Or if not sure of the need, staff should insert this clause, “**Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la Catoosa County al telefono 706-965-2500, cuando menos 48 horas antes de la junta,**” which asks persons who need Spanish language assistance to make arrangements with the County within two days of the publication notice.

Element 5: Monitoring and Updating the LEP Plan

The Plan will be reviewed and updated on an ongoing basis. At a minimum, the County will follow the Title VI Program update schedule for the LEP Plan. Updates will consider the following:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Bartow County?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified County programs? Are there other programs that should be included?
- Have the County’s available resources, such as technology, staff and financial costs changed and are they sufficient to fund the language assistance resources needed?
- Were any complaints received?

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.

The Bartow County Transit System recognizes that there are LEP groups within the Bartow County service area that qualify for the Safe Harbor Provision and will take the necessary steps to provide translation material to LEP language groups as deemed necessary and appropriate.

Dissemination of the County Limited English Proficiency Plan

The County will post the LEP Plan on its website at www.bartowga.org. Additionally, the Policy Statement and Complaint Procedure will be posted at the Bartow County Transit Office, the Senior Centers, the Bartow County Human Resources Office and the Bartow County Commissioner’s Office. The Complaint Policy Statement and Complaint Procedure are also included in the Transit vehicles.

Any person, including social services, non-profit organizations, law enforcement agencies and other community partners with internet access will be able to access the Plan. For those without personal internet service, the Bartow County Library offers free internet access. All Transit employees will also be educated on the importance of providing language assistance. LEP persons may obtain copies of the Plan upon request.

Any questions or comments regarding this Plan should be directed to the County’s Title VI Specialist:

Bartow County Human Resources Office
135 W. Cherokee Avenue, Suite 251
Cartersville, Georgia 30120
Phone: (770) 387-5020
Fax: (770) 387-5019
Email: southerns@bartowga.org

LAP APPENDIX A

POPULATION & DEMOGRAPHIC MAPS

5.6 District 6

District 6 is composed of 18 counties located in the northwest corner of Georgia. Four counties in District 6 are under the purview of a metropolitan planning organization and therefore not included in the rural STIP study area, leaving 12 in this assessment. Using 2010 Census data, District 6 contains 111 census tracts of which 12 are over the Minority EJ threshold, 40 are over the Hispanic EJ threshold and 43 are over the Elderly EJ threshold. Using ACS 2006-2010 estimate data, 36 tracts are above the low-income EJ threshold and 43 tracts are above the LEP EJ threshold. Figure 38, below, is a map of the counties located in District 6.

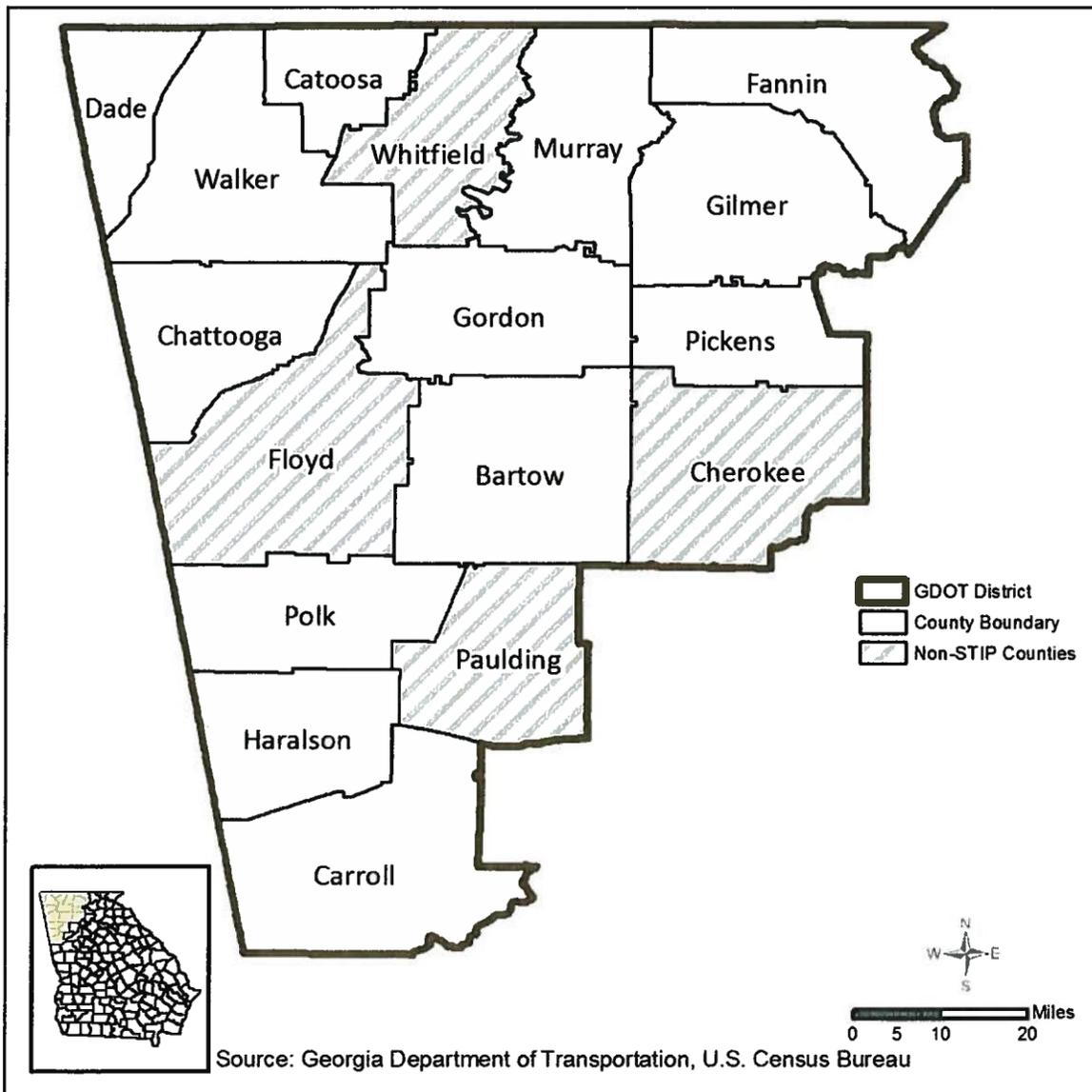
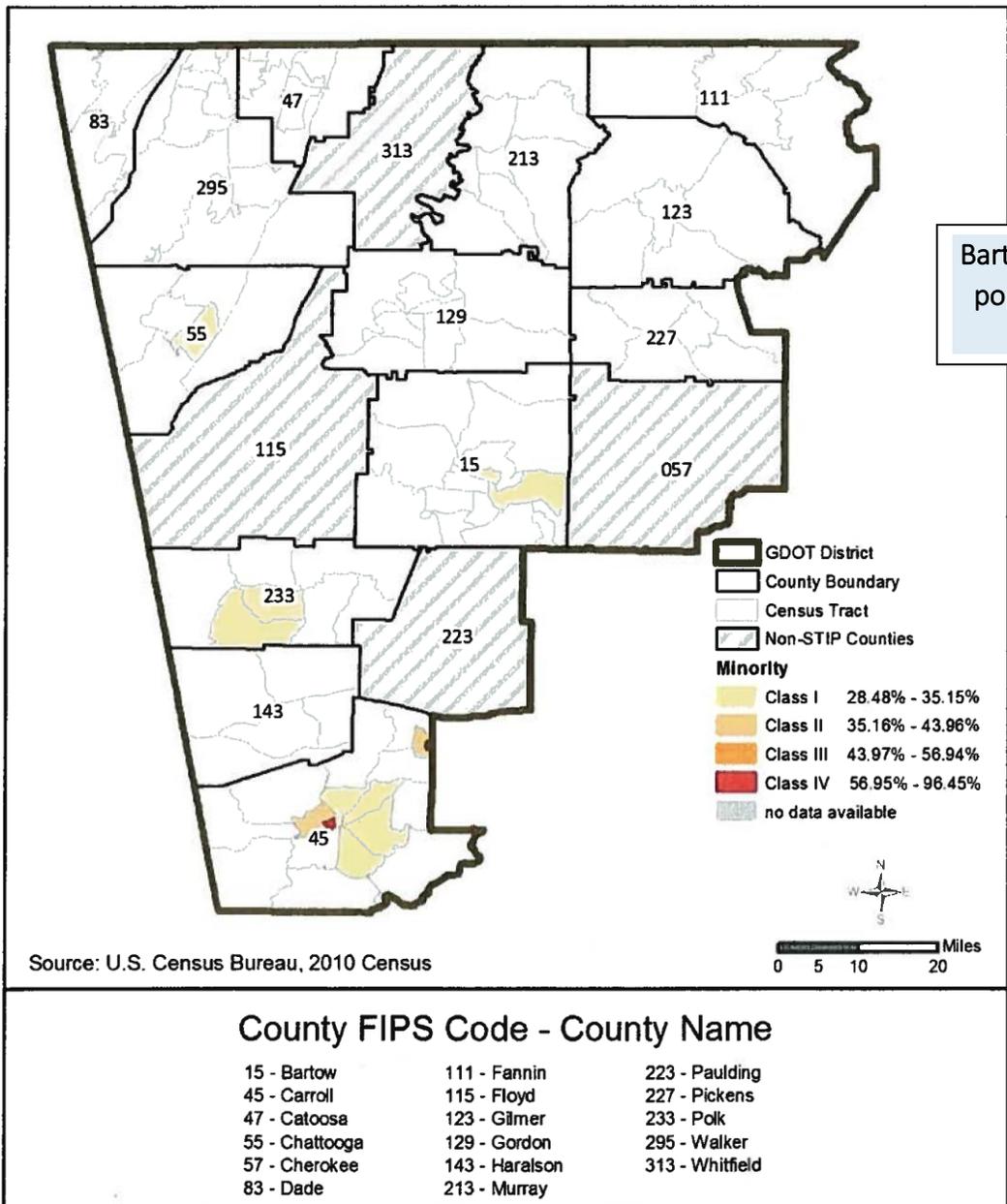


Figure 38: District 6

APPENDIX J

5.6.1 Minority EJ Population

Figure 39 is a map of the minority EJ population located in District 6. Within District 6, 11 percent of the tracts have a minority population above the minority EJ threshold. The analysis shows only one Class IV tract located Carroll County. The analysis also shows zero Class III tracts, two Class II tracts and nine Class I tracts. Tract locations can be found in Figure 39.



Bartow County has a small minority population that falls in the Class I percentages.

Figure 39: District 6 Minority EJ Population

APPENDIX J

5.6.2 Hispanic EJ Population

Figure 40 is a map of the Hispanic EJ population located in District 6. Within District 6, 36 percent of the tracts have a Hispanic population above the Hispanic EJ threshold. The analysis shows 17 Class IV tracts located in the following counties: Murray, Gilmer, Gordon, Bartow, Polk and Carroll. The analysis also shows 11 Class III tracts, seven Class II tracts and five Class I tracts. Tract locations can be found in Figure 40.

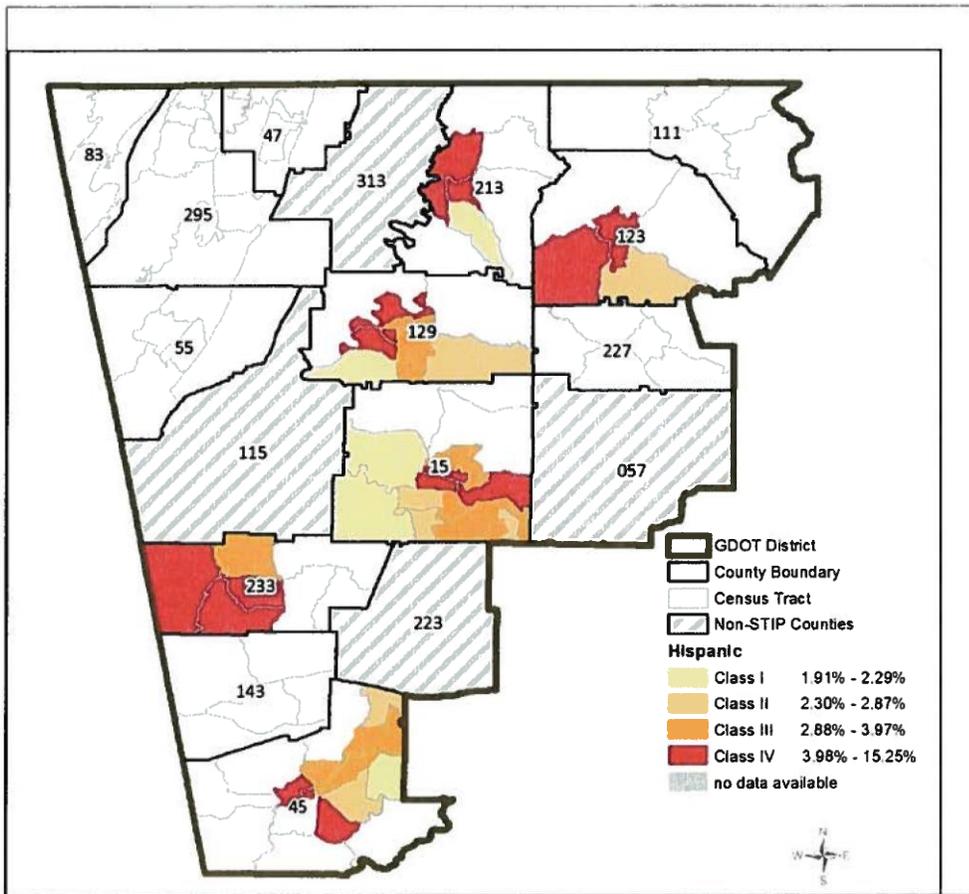


Figure 40: District 6 Hispanic EJ Population

Bartow County has areas of Hispanic population above the Hispanic EJ threshold, particularly in the southern half of the County.

APPENDIX J

5.6.3 Low-income EJ Population

Figure 41 is a map of the low-income EJ population located in District 6. Within District 6, 32 percent of the tracts have a low-income population above the low-income EJ threshold. The analysis shows three Class IV tracts located in the following counties: Murray, Polk and Carroll. The analysis also shows seven Class III tracts, ten Class II tracts and 16 Class I tracts. Tract locations can be found in Figure 41.

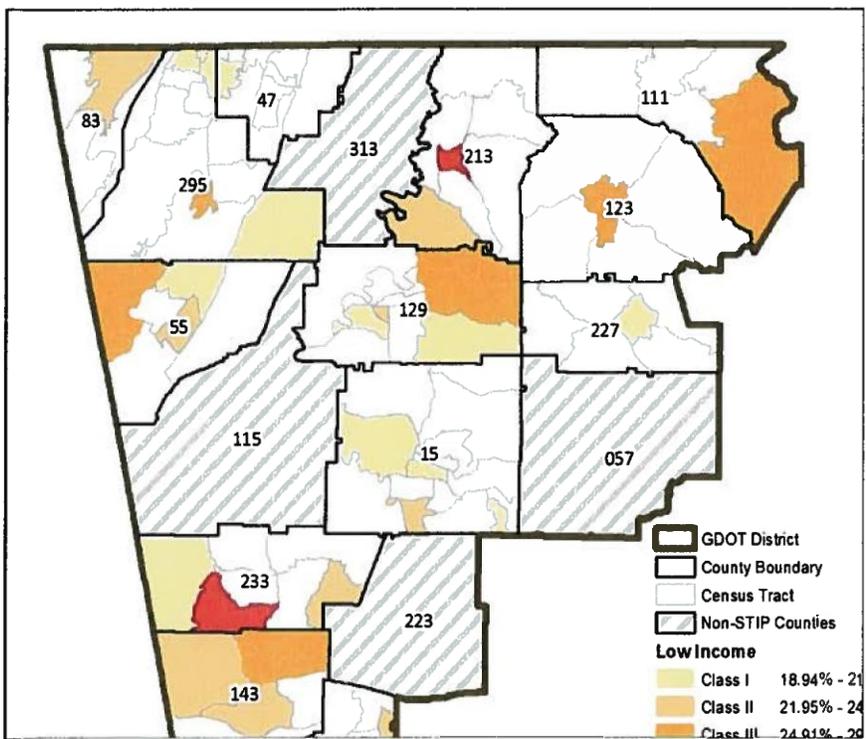


Figure 41: District 6 Low-income EJ Population

Bartow County has a small section of the county that falls into the Class I income status and a much smaller section of the county that falls into the Class II income status.

5.6 4 Elderly EJ Population

APPENDIX J

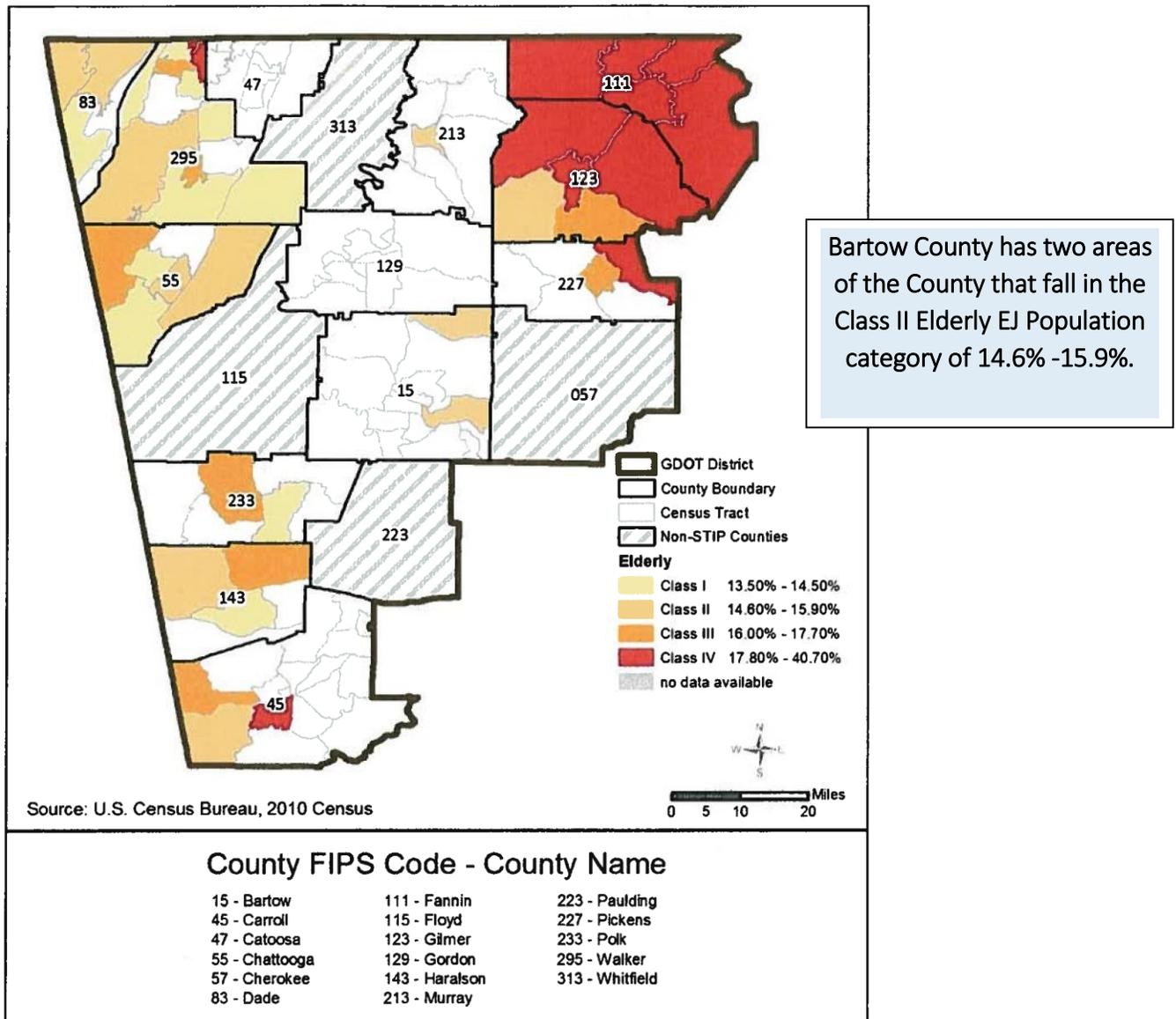


Figure 42: District 6 Elderly EJ Population

Figure 42 is a map of the elderly EJ population located in District 6. Within District 6, 39 percent of the tracts have an elderly population above the elderly EJ threshold. The analysis shows 12 Class IV tracts located in the following counties: Fannin, Gilmer, Pickens, Walker and Carroll. The analysis also shows nine Class III tracts, 11 Class II tracts and 11 Class I tracts. Tract locations can be found in Figure 42.

5.6.5 LEP EJ Population

Figure 43 is a map of the LEP EJ population located in District 6. Within District 6, 39 percent of the tracts have a LEP population above the LEP EJ threshold. The analysis shows 15 Class IV tracts located in the following counties: Murray, Gilmer, Gordon, Bartow, Polk and Carroll. The analysis also shows nine Class III tracts, ten Class II tracts and nine Class I tracts. Tract locations can be found in Figure 43.

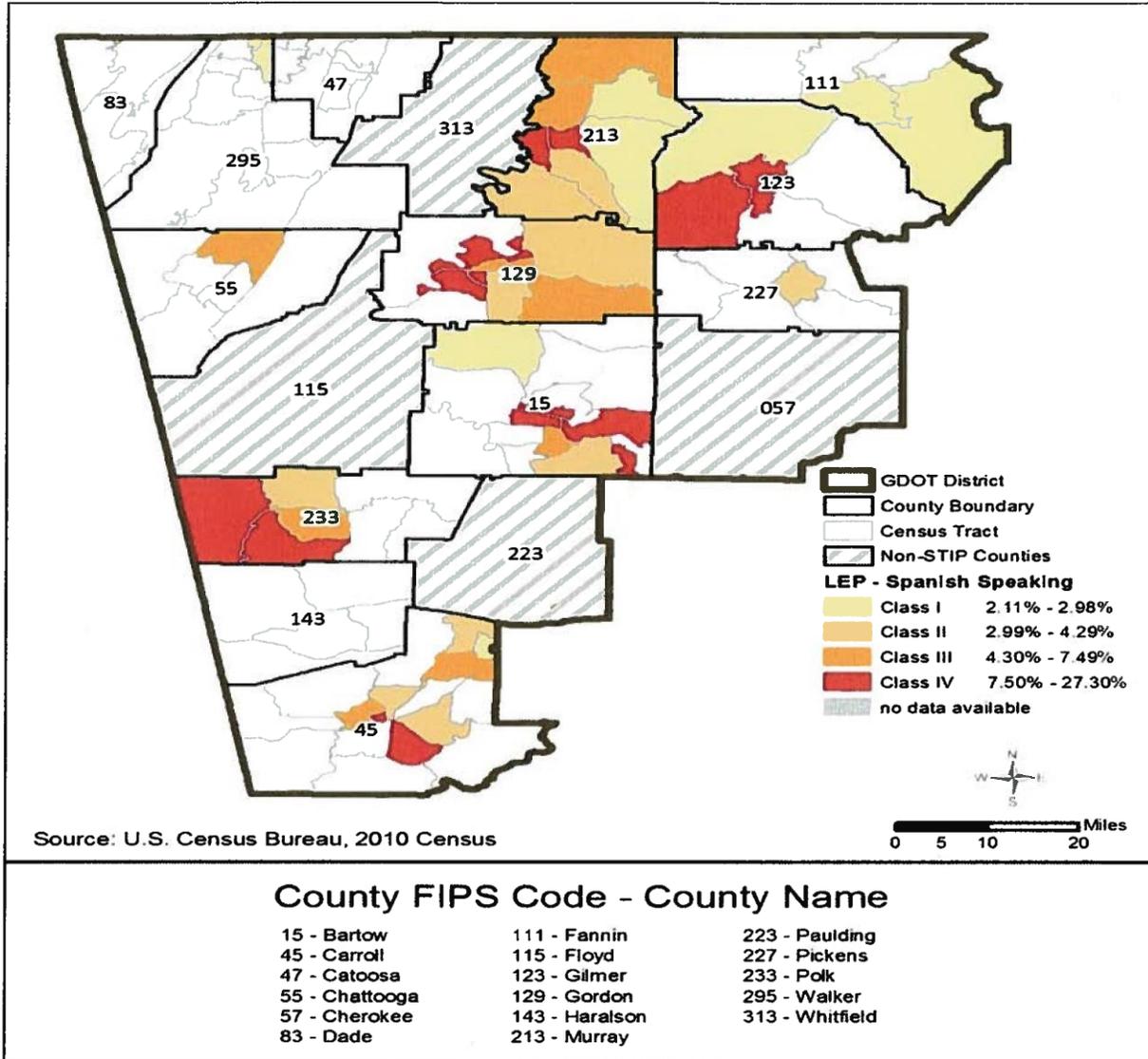
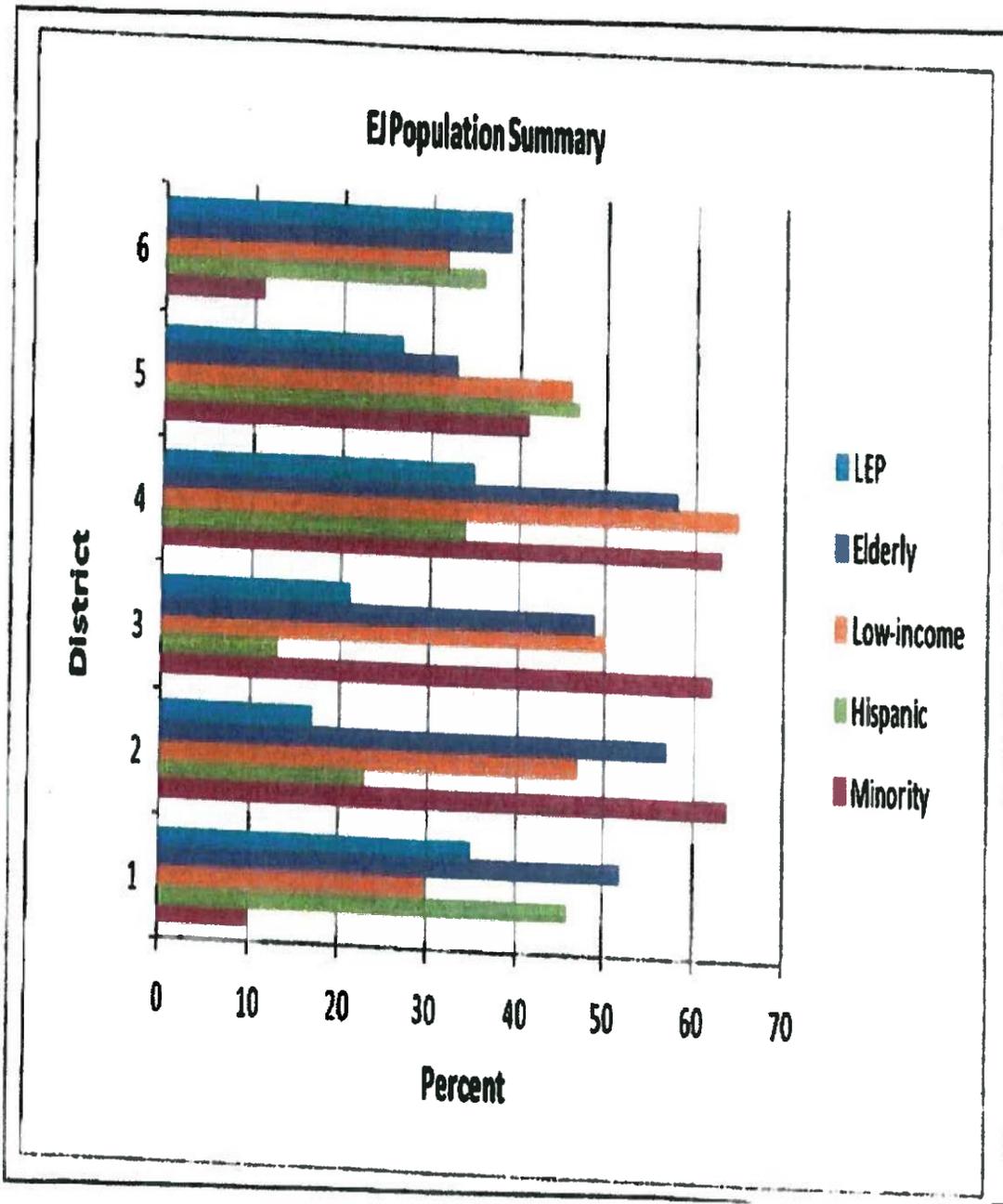


Figure 43: District 6 LEP EJ Population

Bartow County has areas of LEP Spanish Speaking Population ranging from Class I – Class IV categories.

Figure 44: EJ Summary Chart



APPENDIX J

6.0 Focus and Findings

Figure 44 provides a summary of the percent of census tracts within each District with EJ populations above the STIP threshold for each category (minority, Hispanic, low-income, elderly and LEP). This gives a visual comparison of the EJ populations in each District.

6.1 Minority Findings

Minority populations are greatest in Districts 2, 3 and 4, where greater than 60 percent of the census tracts are above the minority EJ threshold. Districts 1 and 6 have the lowest percentage of census tracts above the minority EJ threshold.

6.2 Hispanic Findings

Hispanic populations are greatest in Districts 1 and 5 where roughly 45 percent of the census tracts in the region are above the Hispanic EJ threshold. The increased percentage of Hispanic tracts in District 5 may be attributed to increased farming within the region. District 3 has the lowest percentage of census tracts above the Hispanic EJ threshold.

6.3 Low-income Findings

The percentage of low-income populations is greatest in District 4, where 65 percent of the census tracts in the region are above the low-income EJ threshold. District 4 is located in southwest Georgia and is consistently rural throughout. The lack of development within this region and the increased dependence on farming may contribute to a higher occurrence of low-income levels. Districts 1 and 6 have the lowest percentage of tracts above the low-income EJ threshold; both of these districts are located in north Georgia, a popular destination for retirees.

6.4 Elderly Findings

The percentage of elderly populations is greatest in Districts 1, 2 and 4, where greater than 50 percent of the census tracts are above the elderly EJ threshold. District 5 has the lowest percentage of census tracts above the elderly EJ threshold.

6.5 LEP Findings

LEP populations are greatest in Districts 1 and 6, where 35 percent and 39 percent of the census tracts are above the LEP EJ threshold, respectively. These higher concentrations of non-English speaking residents demonstrate the need for Spanish language public involvement and outreach strategies within these regions. District 2 has the lowest percentage of census tracts exceeding the LEP EJ threshold; Spanish language public involvement and outreach is not as critical in this part of the STIP study area; however, it may still be necessary.

APPENDIX B

AVAILABLE RESOURCES

LAP APPENDIX B

List of Available Resources

If the required language is not available or if a formal interpretation is required, staff shall use the telephone interpreter service.

Formal Interpreter and Translation Service:

The County will utilize the Language Line Interpreter Services at 1-800-752-6096.

APPENDIX C

DISCRIMINATION COMPLAINT PROCEDURE

LAP APPENDIX C

Bartow County Discrimination Complaint Procedure

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color and national origin for programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, Bartow County has in place a Title VI complaint procedure.

1. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation from Bartow County Government or its employees while working in their official capacity may file a written complaint. All written complaints received by the County are referred immediately to the County's Title VI Specialist, to the FTA's Title VI Coordinator for processing in accordance with approved procedures.

Written complaints may be submitted to:

Title VI Coordinator

Bartow County Human Resources Office

135 W. Cherokee Avenue, Ste. 217-B

Cartersville, GA 30120

Phone: (770) 387-5020

Email: southerns@bartowga.org

2. The County's Transit Director shall resolve verbal and non-written complaints received by the County informally. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the Complainant shall be referred to the FTA's Title VI Coordinator for processing in accordance with approved procedures.
3. The County's Transit Director will advise the FTA's Title VI Coordinator within five (5) calendar days of receipt of allegations. The following information will be included in every notification to the FTA's Title VI Coordinator:
 - a. Name, address and phone number of the Complainant;
 - b. Name and address of the County;
 - c. Basis of Complaint (i.e. race, color, national origin, sex, age, disability, religion, familial status or retaliation);
 - d. Date of alleged discrimination;
 - e. Date complaint received by the County;

- f. A statement of complaint;
 - g. If applicable, other agencies where the complaint has been filed;
 - h. An explanation of the actions the County has taken or proposed to resolve the allegation(s) raised in the complaint.
4. Within ten (10) calendar days, the County's Title VI Specialist will acknowledge receipt of the allegation(s), inform the Complainant of action taken or proposed action to process the allegation(s) and advise the Complainant of other avenues of redress available, such as the FTA's Equal Opportunity Office (EOO).
 5. Within sixty (60) calendar days, the recipients County Title VI Specialist will conduct and complete a review of the verbal or non-written allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to the County Administrator.
 6. Within ninety (90) calendar days of the verbal or non-written allegation(s) receipt, the County Administrator will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the FTA's EEO if they are dissatisfied with the final decision rendered by the County.
 7. The County's Title VI Specialist will maintain a log of all verbal and non-written complaints received by the recipient. The log will include the following information:
 - a. Name of Complainant;
 - b. Name of Respondent;
 - c. Basis of complaint (i.e. race, color, national origin, sex, age, disability, religion, familial status or retaliation);
 - d. Date verbal or non-written complaint was received by the recipient;
 - e. Date recipient notified the FTA's Title VI Coordinator of the verbal or non-written complaint; and
 - f. Explanation of the action the County has taken or proposed to resolve the issue raised in the complaint.

**TITLE VI PROGRAM AND RELATED STATUTES
DISCRIMINATION COMPLAINT AGAINST BARTOW COUNTY**

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 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
County Office/Department this complaint is against:
Name of County Staff/Employee that you believe discriminated against you:
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:

**Bartow County Human Resources
135 W. Cherokee Ave., Suite 217-B
Cartersville, Georgia 30120**

APPENDIX D

**RESOLUTION OF THE
BARTOW COUNTY COMMISSIONER**

A RESOLUTION OF THE COUNTY COMMISSIONER OF BARTOW COUNTY SITTING FOR COUNTY PURPOSES FOR THE PURPOSE OF **APPROVING THE BARTOW COUNTY TITLE VI PLAN AS AUTHORIZED BY THE FEDERAL TRANSIT ADMINISTRATION AND THE MOVING AHEAD FOR PROGRESS IN THE 21ST CENTURY (MAP-21), PUBLIC LAW 112-141** AND FOR OTHER PURPOSES AT A REGULAR PUBLIC MEETING OF THE COUNTY COMMISSIONER HELD ON MARCH 11, 2015.

WHEREAS, as the recipient of Federal Transit Administration (FTA) funding, Bartow county is required to maintain a Title I program; and

WHEREAS, the 2015 Bartow County Title VI Plan for Transit Operations was developed per FTA Circular 4702.1B to meet the new requirements as authorized in the Moving Ahead for Progress in the 21st Century Law 112-141; and

WHEREAS, FTA Circular 4702.1B requires each recipient of federal funding assistance to provide a copy of the minutes or a resolution demonstrating the County's consideration, awareness, and approval of the contents of the Title VI plan; and

WHEREAS, the Commissioner deems it to be in the best interest of the citizens of Bartow County to adopt a Title VI Plan for Transit Operations to provide fair and reasonable public transportation services to the citizens of the County.

NOW THEREFORE BE IT RESOLVED by virtue of the authority vested in the Commissioner by law, that the Commissioner hereby approves the 2015 Bartow County Title VI Plan for Transit Operations as presented, said Plan being incorporated herein by reference.

BE IT FURTHER RESOLVED that the aforementioned recitals are incorporated by reference into the body of this Resolution and such recitals are adopted as findings of fact.

BE IT FURTHER RESOLVED that said Plan shall be made effective immediately upon the execution of this Resolution.

BE IT FURTHER RESOLVED that said Plan shall be permanently filed in the office of the County Clerk of Bartow County and copies of the same shall be distributed to the Director of the Bartow County Transit Service and Human Resources Office.

SO APPROVED AND ADOPTED this 11th day of March, 2015.

ATTEST:

BARTOW COUNTY, GEORGIA

Kathy Gill, County Clerk

Steve Taylor, Sole Commissioner