

Ware County Transit



Title VI Plan



Date Adopted: 2/09/2015

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
1/8/15	Review	Elizabeth Hope	

Title VI Plan Activity Log
(Continued)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

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

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

Ware County Transit System 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 Ware County Transit System.
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: Jimmy Brown, Chairman, Ware County Transit

Date:

2.0 Introduction & Description of Services

Ware County Transit System 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.

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

Title VI Liaison

Paul Smith, County Manager
Employed by Sub recipient-Ware County
912-287-4300
800 Church St, Ste 223 Waycross, GA 31501

Alternate Title VI Contact

Elizabeth Hope, Accounting Specialist
Employed by Sub recipient-Ware County
912-287-4300
800 Church St, Ste 223 Waycross, GA 31501

Ware County Transit System 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

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

Current and Pending FTA Funding

1. FTA Section 5311, July 1, 2014, \$125,403.00, Current
2. FTA Section 5311-Captial Contract, May 16, 2014, \$35,060.00, Current

Current and Pending GDOT Funding

1. GDOT Operating Assistance, July 1, 2014, \$125,403.00, Current
2. GDOT Capital Contract, May 16, 2014, \$4,382.00, Current

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

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.

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

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan GDOT concurrence is pending GDOT corrections. The Plan was approved and adopted by Ware County's Board of Commissioners during a meeting held on February 9, 2015. 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

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

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Ware County Transit System'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 Ware County Transit System's office(s) including the reception desk and meeting rooms, and on the Ware County Government website at www.warecounty.com. Additionally, Ware County Transit System will post the notice at stations, stops and on transit vehicles.

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

4.0 Title VI Procedures and Compliance

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

Once the complaint is received, Ware County Transit System 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.

Ware County Transit System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Ware County Transit System 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, Ware County Transit System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

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

The complaint procedure will be made available to the public on the Ware County Government website www.warecounty.com

4.2 Complaint Form

A copy of the complaint form is provided in Appendix E and on Ware County Government's website www.warecounty.com

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Ware County Transit System will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

4.4 Sub-recipient Assistance and Monitoring

Ware County Transit System has one sub-recipient listed below. Ware County Transit System is required by FTA to ensure that sub-recipients of federal funds comply with all Title VI requirements. To meet this mandate, Ware County Transit System's monitoring consists of collecting data through site visits, day-to-day technical assistance, and reports/forms. Ware County Transit System will use reports and site visits to determine if the sub-recipients are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan.

Title VI Complaint procedures, Title VI Complaint Form, and a sample Title VI Notice have been developed and distributed by Ware County Transit System to its sub-recipients. Ware County Transit System also assists the sub-recipients with demographic maps for Title VI purposes upon request.

List of Your Community Transit Sub-recipients

- MIDS, Inc.

4.5 Sub recipients and Subcontractors

Ware County Transit System 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. Ware County Transit System, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, Ware County Transit System 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 Ware County Transit System, 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, Ware County Transit System 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. Ware County Transit System 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 the Ware County Transit System 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 the Ware County Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for the Ware County Transit System 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 the Ware County Transit System.

5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), the Ware County Transit System 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 the Ware County Transit System in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT.

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

The Public Participation Plan (PPP) for the Ware County Transit System 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 the Ware County Transit Systems. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Ware County Transit System 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 the Ware County Transit System's recent, current, and planned outreach activities.

- Ware County holds a number of meetings and other events designed to gather public input on projects.
- Ware County Employees attend and participate in other community events to promote its services to the public.
- Future plans include on-board surveys to be completed by transit patrons and gathering feedback from transit drivers who have daily contact with patrons.

7.0 Language Assistance Plan

Ware County Transit System operates a transit system within Ware County. The Language Assistance Plan (LAP) has been prepared to address Ware 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 LEP. In Ware County's Transit System service area there are 618 residents or 1.60% who describe themselves as not able to communicate in English very well (Source: US Census). Ware County Transit System 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. Ware County Transit System 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

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

9.0 Title VI Equity Analysis

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” 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, Ware County Transit System will ensure the following:

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

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

10.0 System-Wide Service Standards and Service Policies

Ware County Transit System is not a fixed route service provider

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

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

General Requirements

All recipients must submit:

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

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

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

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

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

Appendix B

Current System Description

Current System Description

Ware County Transit System's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

Ware County Transit System is a local government entity. Our organization is made up of over 300 full-time employees and over 100 part-time employees. Our County Manager is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program.

Ware County Transit System's Third Party Operator, MIDS, Inc., is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Ware County Clerk 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 Third Party Operator's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

Maintenance on all agency vehicles is provided by MIDS, Inc. MIDS, Inc., employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 1610 River Street Valdosta, GA and are maintained by the Operations Manager. All records are maintained and retained for a minimum of four (4) years.

Our transportation department has a total of 10 employees that include: 5 full-time drivers, 0 part-time drivers, 2 administrators and 3 support staff.

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

Ware County Transit provides a demand/response system. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes vans and modified vans. Three of our vehicles are equipped for wheelchair service. We prioritize

grouping trips and multi-loading to the maximum extent possible. We make over 350 passenger trips per month 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

Pending

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

Appendix D

Title VI Sample Notice to Public

Title VI of the Civil Rights Act, 1964

As a recipient of federal financial assistance under the Georgia Department of Transportation (GDOT), Ware County hereby gives public notice that it is our policy to assure compliance with Title VI of the Civil Rights Act of 1965, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities.

Any person who believes they have been subject to unlawful discriminatory practices under Title VI has the right to file a formal complaint.

If you believe that you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under any Ware County Transit service, program or activity, you may file an official Title VI complaint with Ware County. We encourage you to make your complaint in writing. Ware County Complaint Procedures and Complaint Form can be obtained by calling 912-287-4300. Notices are posted at the Ware County Courthouse, www.warecounty.com and in all Ware County Transit vans.

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

For additional information on Ware County Transit's nondiscrimination obligations, please contact Ware County by mail or phone using the information below.

Ware County Board of Commissioners
800 Church Street, Suite 223
Waycross, GA 31501
912-287-4300



Appendix E

Ware 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 I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____				

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

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

Signature and date required below

_____ Date _____
 Signature

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

Ware Transit System Title VI Liaison
 Attn: Paul Smith
 800 Church St, Ste 223
 Waycross, GA 31501

Appendix F

Public Participation Plan (PPP)

Introduction

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

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

Ware County Transit System 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 Ware County Transit System website (www.warecounty.com) and all feedback on the site will be recorded and passed on to Ware County Transit System management. The public will also be able to call the Ware County Transit System office at 912-287-4300 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Ware County Transit System 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, Ware County Transit System 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

Opportunities for at least one Public Hearing regarding transit is offered by Ware County annually. Since the inception of the transit program, no request for a Public Hearing has been made.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Ware County Transit System operates a transit system within Ware County, GA. The Language Assistance Plan (LAP) has been prepared to address Ware 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 LEP. In Ware County Transit System's service area there are 618 residents or 1.60% who describe themselves as not able to communicate in English "very well" (Source: US Census). Ware County Transit System 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. Ware 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 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 Ware County Transit System be able to communicate effectively with all of its riders. When Ware County Transit System 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. Ware County Transit System 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 Ware County Transit System will undertake 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 assistance to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Ware County Transit System 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 Ware Transit System 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 Ware County Transit System program, activity or service.
2. The frequency with which LEP persons come in contact with Ware County Transit System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Ware Transit System to the LEP population.
4. The resources available to Ware County Transit System 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 33,238 residents in the Ware County Transit System service area 618 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Ware County Transit System’s services. For the Ware County Transit System service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 95.9% speak English “very well”. For groups who speak English “less than very well”, 1.6% speak Spanish, .1% speak Other Indo-European languages and .1% speak Other Pacific Island languages.

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

Ware County Transit System 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 there is a lack of a prominent LEP group. Phone inquiries and staff survey feedback indicated that Ware County Transit System 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 7 years, Ware County Transit System has had zero (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.

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.

Ware County Transit is provided as a service to riders in the County to access basic, non-emergency public transit services.

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

Ware County Transit System assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. The SGRC website at www.sgrc.us/transportation, where a Google Translator can provide for basic information on the service to LEP individuals.

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.

Ware County Transit System has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 95.9% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (3.10%). Of those whose primary spoken language is Spanish, approximately 1.6% 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 .2% of the service area population.

Ware County Transit System may identify language assistance need for an LEP group by:

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

Ware County Transit System will undertake the following actions to improve access to information and services for LEP individuals:

1. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.

2. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
3. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

c. Element 3: Training Staff

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

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

In the case of Ware County Transit System, the most important staff training is for Customer Service Representatives and transit drivers. The following training will be provided to Customer Service Representative:

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

d. Element 4: Providing Note to LEP Persons

Ware County Transit System will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices will also be posted in Ware County Transit System's office lobby, on buses, and County Administration Building. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

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

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

Ware County Transit System 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. Ware County Transit System is open to suggestions from all sources, including customers, Ware County Transit System 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.

Ware County Transit System service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Ware County Transit System does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Ware County Transit System 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:

Ware County Transit System Service Area

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total	33,238	100.00
Speak only English	31,866	95.90
Spanish or Spanish Creole	1,025	3.10
Speak English “very well”		
Speak English less than “very well”	534	1.60
French (incl. Patois, Cajun)	0	0
Speak English “very well”	0	0
Speak English less than “very well”	0	0
French Creole	0	0
Speak English “very well”	0	
Speak English less than “very well”	0	
Italian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Portuguese or Portuguese Creole	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
German	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Yiddish	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Other West Germanic languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Scandinavian languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Greek	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Russian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Polish	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Serbo-Croatian	0	
Speak English “very well”	0	

Language	County	Percent of Population
Speak English less than “very well”	0	
Other Slavic Languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Armenian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Persian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Gujarati	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Hindi	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Urdu	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Other Indic languages	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Other Indo-European Languages	234	.70
Speak English “very well”		
Speak English less than “very well”	42	.10
Chinese	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Japanese	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Korean	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Mon-Khmer, Cambodian	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Hmong	0	
Speak English “very well”	0	
Speak English less than “very well”	0	
Thai	0	

Language	County	Percent of Population
Speak English "very well"	0	
Speak English less than "very well"	0	
Laotian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Vietnamese	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Asian languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Tagalog	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Pacific Island languages	57	.20
Speak English "very well"		
Speak English less than "very well"	42	.10
Navajo	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other Native American languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hungarian	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Arabic	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Hebrew	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
African languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
Other and unspecified languages	0	
Speak English "very well"	0	
Speak English less than "very well"	0	

Appendix I

Demographic Maps

Not Required at this time

Appendix J

Title VI Equity Analysis

Ware County Transit System has not performed Title VI Equity Analysis