

SCOT: SCOTTSVILLE TRANSIT



Title VI Plan

Date Adopted: 2/10/2020



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
12/13/19	Received notice from KY-OTD Plan needs revision	GD	
2/10/2020	Revised Title VI adopted by Scottsville City Council	GD	
3/16/20	Received notice from KY-OTD needs revision.	GD	
4/28/2020	Revised Title VI resubmitted in FY2021 Grant portal.	GD	

Title VI Plan Activity Log
(Continued)

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

Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan.....	1-1
2.0 Introduction & Description of Services	2-1
2.1 First Time Applicant Requirements	2-2
2.2 Annual Certifications and Assurances.....	2-2
2.3 Title VI Plan Concurrence and Adoption.....	2-2
3.0 Title VI Notice to the Public	3-1
3.1 Notice to Public.....	3-1
3.2 Notice Posting Locations.....	3-1
4.0 Title VI Procedures and Compliance	4-2
4.1 Complaint Procedure	4-2
4.2 Complaint Form	4-2
4.3 Record Retention and Reporting Policy.....	4-3
4.4 Sub-recipient Assistance and Monitoring.....	4-3
4.5 Contractors and Subcontractors.....	4-3,4-4
5.0 Title VI Investigations, Complaints, and Lawsuits	5-5
6.0 Public Participation Plan	6-6
7.0 Language Assistance Plan	7-7
8.0 Transit Planning and Advisory Bodies.....	8-7
9.0 Title VI Equity Analysis.....	9-7,10-8
10.0 System-Wide Service Standards and Service Policies	10-8
10.1 Service Standards.....	Error! Bookmark not defined.
10.2 Service Policies.....	Error! Bookmark not defined.
11.0 Appendices.....	11-9

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: SCOTTSVILLE TRANIST SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

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

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Scottsville Transit assures the Florida 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, the Civil Rights Restoration Act of 1987 and the Kentucky Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

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

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Scottsville Transit.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT 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 primary recipients (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

David Burch
Mayor, City of Scottsville
Date: 3/10/2020

2.0 Introduction & Description of Services

This is a section of the plan which covers general information about the transit agency.

Scottsville Transit submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Scottsville Transit is a sub-recipient of FTA funds and provides service in city limits of Scottsville, KY. A description of the current Scottsville Transit system is included in Appendix B.

Title VI Liaison

David Burch

Mayor

270-237-3238

201 W Main Street Ste 10 Scottsville, KY 42164

Alternate Title VI Contact

Gayle Davis

Transit Manager

270-237-3238

201 W Main Street Ste 11 Scottsville, KY 42164

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

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

2.1 First Time Applicant Requirements

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

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

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Scottsville Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by KY-OTD or other regulatory agencies.

2.3 Title VI Plan Concurrence and Adoption

The Plan was approved and adopted by City of Scottsville City Council during a meeting held on 2/10/2020. A copy of the meeting minutes and FDOT concurrence letter is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

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

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

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

The Scottsville Transit notice is included in Appendix D of this plan.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Scottsville Transit 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 Scottsville Transit office(s) including the reception desk and meeting rooms, and on the Scottsville Transit website at http://www.cityofscottsville.org/citydepartments/scottsville_transit.php Additionally, Scottsville Transit will post the notice at stations, stops and on transit vehicles.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Scottsville Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Scottsville Transit investigates complaints received no more than 180 days after the alleged incident. Scottsville Transit will process complaints that are complete.

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

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

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

The complaint procedure will be made available to the public on Scottsville Transit's website http://www.cityofscottsville.org/citydepartments/scottsville_transit.php

4.2 Complaint Form

A copy of the complaint form in English is provided in Appendix E and on Scottsville Transit's website http://www.cityofscottsville.org/citydepartments/scottsville_transit.php

4.3 Record Retention and Reporting Policy

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

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

4.4 Sub-recipient Assistance and Monitoring

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

4.5 Contractors and Subcontractors

Scottsville Transit is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Scottsville Transit, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with 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 *Kentucky Department of Transportation*, the *Federal Highway Administration*, *Federal Transit Administration*, *Federal Aviation Administration*, and/or the *Federal Motor Carrier Safety 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 *Kentucky Department of Transportation*, the *Federal Highway Administration*, *Federal Transit Administration*, *Federal Aviation Administration*, and/or the *Federal Motor Carrier Safety 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, Scottsville Transit shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
 6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Scottsville Transit, Kentucky Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a part of the Joint Participation Agreement (JPA) with FDOT, Scottsville Transit and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Scottsville Transit and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of KY-OTD-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.

5.0 Title VI Investigations, Complaints, and Lawsuits

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

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

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	0	0		
1.				
2.				
Lawsuits	0	0		
1.				
2.				
Complaints	0	0		
1.				
2.				

6.0 Public Participation Plan

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

The Public Participation Plan (PPP) for Scottsville Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Scottsville Transit. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

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

- Community Needs Assessment.
- Typical day to day activities of all programs within the agency.
- Networking with social media, local radio and newspaper.
- Providing transportation for Veterans to the local VFW every 4th Monday of the month.
- Annual survey for SCOT will be performed.
- Printed information and schedules distributed at token office.

Scottsville Transit works with Life-Skills, Probation and Parole Offices, the Housing Authority, Social Services Office, and the local senior housing in attempts to insure the minority, low income, and at the risk residents of the city. Public transportation is available to the public for a very affordable price.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Scottsville Transit operates a transit system within Scottsville city limits. The Language Assistance Plan (LAP) has been prepared to address Scottsville Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Scottsville Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Scottsville Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

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

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

Scottsville Transit will make efforts to encourage minority participation on the committee. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit system.

9.0 Title VI Equity Analysis

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

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

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

Scottsville Transit has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, Your Community Transit does not have any Title VI Equity Analysis reports to submit with this Plan.

10.0 System-Wide Service Standards and Service Policies

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

Scottsville Transit is not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: SCOTTSVILLE TRANSIT SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS
APPENDIX K	TEXT FORMATTING PALETTE

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

- [1. An overview of the organization including its mission, program goals and objectives.](#)
Scottsville Transit's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
- [2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.](#)
Scottsville Transit operates under the City of Scottsville. Our department is made up of one full time transit manager, One full time assistant manager/dispatcher, one full time driver, one part time driver and one intermittent driver. The transit manager reports to the mayor. Operating hours are from 7:00 a.m. to 6:00 p.m., Monday through Friday. Fare is \$.50 per token, for a one-way trip.
- [3. Indicate if your agency is a government authority or a private non-profit agency.](#)
Scottsville Transit is operated by the City of Scottsville. The service is open to the general public with accommodations for ambulatory and non-ambulatory riders.
- [4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?](#)
Scottsville Transit's manager is responsible for training and management of our transportation program. All safety sensitive employees are required to complete KY- OTD approved safety and security training course as part of their new hire orientation. All new employees are also required to complete on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheelchair lifts and securement devices. The Scottsville Human Resource Director is responsible for annual renewal of all liability insurance for both KY-OTD owned vehicles. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
- [5. Who provides vehicle maintenance and record keeping?](#)
Regular maintenance on Scottsville Transit's vehicles is provided by Stamps Mobile Maintenance and Repair LLC. All vehicle files and driver files are kept on-site at our office located at 201 W Main street ste 11, Scottsville KY 42164. All records are maintained and retained for a minimum of four (4) years.
- [6. Number of current transportation related employees](#)
Our transit department has a total of 5 employees that include: 1 full-time driver, 1 Transit manager, 1 assistant transit manager/dispatcher, 1 part-time driver, and 1 intermittent driver.

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

Only transportation employees that have completed all of the required safety and driving training requirements will be allowed to drive the agency vehicles. All Scottsville Transit System drivers are subject to FTA drug and alcohol policies.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available the general public. Our service incorporates a deviated-fixed route with a one quarter mile deviation allowance. We provide a wide range of trip purposes that include medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use one vehicle to provide passenger services. Our fleet includes one 12x2 passenger bus. Our vehicle is equipped for wheelchair service. Scottsville Transit provides a monthly average of 387 passenger trips and travels an average of 2593 miles.

Appendix C

Title VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter

**12.0 Minutes of Regular Meeting
Common Council of City of Scottsville, Kentucky
February 10, 2020
6:00 P.M.**

The Common Council of the City of Scottsville met in regular session February 10, 2020 at 6:00 p.m. at the City-County Building, Scottsville, Kentucky.

Mayor David Burch and the following members of the council were present: Dr. Mark Huntsman, Rogerlyne Briddon, Michael McGuire, Beverly Tracy Anderson, Dr. Franklin Foster and Ken Goforth.

Mayor Burch called the meeting to order and welcomed all guests. Jerry Biddle lead the Pledge of Allegiance.

Rogerlyne Briddon made motion second by Beverly Tracy Anderson to adopt the agenda. The vote was unanimous.

Heather Pierce's 10th grade student proposals were postponed until the March regular City Council meeting.

Recognition was made by Mayor David Burch to Justin Spears for being awarded 2019 Water Operator of The Year presented by the Central Kentucky Water and Wastewater Operators Association.

In updates to the Council IDA Director Johnny Hobdy gave updates on current projects. He discussed in length the TVA Invest Prep Grant that will be used to fund improvements at the new Industrial Park on Highway 231. These projects include 1250 feet of additional blacktopping into the Industrial Park, new streetlights, and new signage. Director Hobdy expressed gratitude to the City both personally and professionally pertaining to the Highway 231 sewer line project. In other updates to the Council Julie Trovillion, Partnership Specialist with the US Census Bureau, spoke on the 2020 census and the importance of participating in the census.

Rogerlyne Briddon made motion second by Dr. Mark Huntsman to approve the minutes of the January 13th Regular meeting and the January 28th Special Called meeting as presented to Council. The vote was unanimous.

Michael McGuire made motion second by Beverly Tracy Anderson to approve and authorize Mayor Burch to sign Municipal Road Aid Agreement totaling \$87,554.00 for 2020. This is an increase from the 2019 agreement totaling \$84,747.13. The vote was unanimous.

City Clerk Gayle Davis presented the Title VI Plan for Transit to City Council. Motion made by Ken Goforth second by Franklin Foster to approve and adopt Title VI Plan for Transit. The vote was unanimous.

City Clerk Gayle Davis presented the Procurement Policy for Transit to the City Council. Motion made by Franklin Foster second by Beverly Tracy Anderson to approve and adopt Procurement Policy for Transit. The vote was unanimous.

Beverly Tracy Anderson made motion second by Michael McGuire to declare obsolete computer at the Sewer Plant as surplus for disposal. The vote was unanimous.

Scottsville Police Chief Darren Tabor stated in his written report to council that there were 913 calls for service in the month of January, 15 Escorts, 23 Non-Injury Accidents, 7 Injury Accidents, 20 Alarm Calls, 10 Welfare Checks, 129 Traffic Stops, 21 Motorist Assist, 16 Lock Outs, 33 Attempts to Serve, 9 Theft Reports, 19 Domestic Calls, 23 Investigations, 8 Juvenile Complaints, 7 Mental Health Calls, 1 Suicide Calls and 180 Extra Patrols. Rogerlynn Briddon made motion second by Michael McGuire to approve the report of Chief Tabor. The vote was unanimous.

Human Resources Director Brittany Sloan gave the Treasurer's report for the month of January. Franklin Foster made motion second by Beverly Tracy Anderson to approve the Treasurer's report. The vote was unanimous.

Human Resources Director Brittany Sloan gave the overtime report for the month of January.

City Superintendent Greg Cook gave his report for the month of December. In the Water Department in the month of January there were 3 leaks repaired, 3 meters changed out and 2 taps made. In the Gas Department there were 5 gas leaks repaired and 20 gas meters changed out. 33 loads of brush and 17 loads of junk were hauled, 3 load of topsoil and 3 loads of leaves were hauled. In the Sewer Department they rodded 6 sewer lines and camera work has begun on 7 sewer lines. Additionally, city crews tore out 4 sidewalks to be replaced on North 4th Street and cleaned up the park on South 3rd Street. Mr. Cook also met with the Public Service Commission for a follow up from the November inspection and stated that all is good.

Assistant Transit Manager Michala Thomas gave the Transit report for the month of January. Thomas reported 419 riders, 0 adolescent riders under the age of 1 year, 21 wheelchair accommodations. This is a 65-rider increase. No change in adolescent riders. A 13-wheelchair accommodation rider decrease from the month of December. Every fourth Monday veterans will be available to ride the bus to the VFW. Tokens will be held with the transit driver and paid for by the VFW.

Water Treatment Superintendent Donnie Reels reported that for the month of January the plant produced 33,032,000 gallons of water with an average daily production of 1,065,548 gallons with no violations. Reels reported to council that the plant analyzed 1,822 compliance and process control samples, including 73 distribution samples. 21 samples were pulled and sent to a certified laboratory for analysis. 11 regulatory compliance documents were sent to the EPA and Division of Water. Reels went on to report that Hach came and performed first quarter preventative maintenance and calibrations on lab instruments and inline analyzers. A1 Plumbing pumped out both sludge lagoons at the WTP. 2019 files have been sent off to generate the 2019 Consumer Confidence Report.

Dispatch Supervisor Maddie Calvert presented a written dispatch report.

Cemetery Sexton Edward Williams stated that at Crescent Hill the recent winds have blown a number of flowers off graves. The crews have picked them up and placed them by the fence. Families may go there and recover their flowers and place them back on the graves if they choose to do so. Edward reported 1 burial and no cremations for the month of January.

WWTP Supervisor Collin Keen gave his regular written report to Council. For the month of January 2020. The reports completed were Monthly Flow report, Monthly discharge report to the state, Monthly Council Report. 39,195,000 gallons of water was treated thru the plant. Rainfall recorded was 5.9 inches. There were 3 loads of dry matter pressed and hauled to the Glasgow Landfill with tonnage of 33.07. Pump checks performed at the plant were 465. 930 pump checks performed at pump stations. 1471 process control tests performed. 80 analytical tests collected sent to certified lab. It was noted that: 1. A belt was replaced on the press. 2. Youngs Electric replaced a contactor on carousel aerator. 3. C.I. Thornburg installed new dopplers on the Effluent meter at no cost.

With no further business to come before the council it was moved and unanimously carried that the meeting be adjourned.

David Burch, Mayor

Attest: _____
Gayle Davis, City Clerk

Appendix D

Title VI Sample Notice to Public

YOUR CIVIL RIGHTS UNDER TITLE VI

Scottsville Transit adheres to the Civil Rights Act of 1964 which states: "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 subjected to discrimination under any program or activity receiving Federal financial assistance." For more information on the Title VI transit obligations, please see the contact information below.

MAKING A TITLE VI COMPLAINT

Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color, or national origin, may file a complaint with the Scottsville Transit (SCOT). Such complaint must be filed in writing with SCOT no later than 180 days after the alleged discrimination. For information on how to file a complaint, contact (SCOT) as listed below.

Transit manager Gayle Davis, SCOT Scottsville Transit, 201 W Main St, Scottsville, KY 42164, (270) 239-3239 TTY or KY. Relay Number: 711

Email Address: gdavis@cityofscottsville.org

Written complaints may also be submitted to the Project Manager or Public Transit Branch Manager at the Kentucky Transportation Cabinet at (502) 564-7433.

Written complaints may also be filed with the U. S. Department of Transportation/Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination, at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

To accommodate limited English proficient individuals, oral complaints to be documented and/or translated may also be given at the above address. If information is needed in another language, contact (270) 239-3239. Jika informasi diperlukan dalam bahasa lain, silakan hubungi (270) 239-3239

HAK SIPIL ANDA DI BAWAH JUDUL VI

The Scottsville Transit menganut Civil Rights Act tahun 1964 yang menyatakan: "Tidak ada orang di Amerika Serikat, akan, atas dasar ras, warna kulit, asal kebangsaan, dikecualikan dari partisipasi dalam, be membantah bene cocok dari, atau dikenai diskriminasi berdasarkan program atau kegiatan apa pun yang menerima bantuan keuangan Federal. " Untuk informasi lebih lanjut tentang kewajiban transit Judul VI, silakan lihat informasi kontak di bawah ini.

MEMBUAT PENGADUAN JUDUL VI

Siapa pun yang percaya bahwa ia telah mengalami diskriminasi dalam pengiriman atau akses ke layanan transportasi umum berdasarkan ras, warna kulit, atau asal kebangsaan, dapat mengajukan keluhan dengan Scottsville Transit (SCOT). Keluhan tersebut harus fi memimpin secara tertulis dengan (SCOT) paling lambat 180 hari setelah dugaan diskriminasi. Untuk informasi tentang cara mengajukan keluhan, hubungi (SCOT) sebagaimana tercantum di bawah ini.

Transit Manajer , Gayle Davis, 201 W Main St, Scottsville , KY 42164 STE 11 , (270) 239 - 3239 TTY atau Ky Relay Nomor: 711

Alamat Email : gdavis@cityofscottsville.org Situs web : http://www.cityofscottsville.org/citydepartments/scottsville_transit.php

Keluhan tertulis mungkin juga su bmitted kepada Manajer Proyek o r P u blic Transit Branch Manager di Kabinet Transportasi Kentucky di (502) 564-7433.

Keluhan tertulis juga dapat diajukan ke Departemen Transportasi / Administrasi Transit Federal AS (FTA) selambat-lambatnya 180 hari setelah tanggal semua diskriminasi, di alamat berikut: Kantor Hak Sipil, Perhatian: Koordinator Program Gelar VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20.590.

Untuk mengakomodasi individu dengan kemampuan berbahasa Inggris yang terbatas, keluhan lisan untuk didokumentasikan dan / atau diterjemahkan juga dapat diberikan pada alamat di atas. Jika informasi diperlukan dalam bahasa lain, hubungi (270) 239 - 3239 . Si se necesita información en otro idioma , con comuníquese: (270) 239-323 9 .

Appendix E

Title VI Complaint Form

Scottsville Transit

Title VI Complaint Form

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

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

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

Signature and date required below

Signature Date

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

Gayle Davis
Transit Manager
201 W Main St ste 11
Scottsville, KY 42164

Formulir Keluhan Judul VI

Bagian I:			
Nama:			
Alamat:			
Telepon (Rumah):		Telepon (Bekerja):	
Alamat Surat Elektronik:			
Persyaratan Format yang Dapat Diakses?	Cetak Besar		Pita Audio
	TDD		Lain
Bagian II:			
Apakah Anda mengajukan keluhan ini atas nama Anda sendiri?		Iya*	Tidak
* Jika Anda menjawab "ya" untuk pertanyaan ini, buka Bagian III.			
Jika tidak, berikan nama dan hubungan orang yang Anda keluhkan:			
Tolong jelaskan mengapa Anda mengajukan pihak ketiga:			

Harap konfirmasi bahwa Anda telah memperoleh izin dari pihak yang dirugikan jika Anda mengajukan atas nama pihak ketiga.		Iya	Tidak
Bagian III:			
Saya percaya diskriminasi yang saya alami didasarkan pada (periksa semua yang berlaku):			
<input type="checkbox"/> Ras <input type="checkbox"/> Warna <input type="checkbox"/> Asal Nasional <input type="checkbox"/> Usia <input type="checkbox"/> Ketidakmampuan <input type="checkbox"/> Status Keluarga atau Agama <input type="checkbox"/> Lainnya (jelaskan) _____			
Tanggal Diduga Diskriminasi (Bulan, Hari, Tahun): _____			
Jelaskan se jelas mungkin apa yang terjadi dan mengapa Anda yakin Anda didiskriminasi. Jelaskan semua orang yang terlibat. Sertakan nama dan informasi kontak orang yang mendiskriminasi Anda (jika diketahui) serta nama dan informasi kontak saksi mana pun. Jika lebih banyak ruang diperlukan, silakan gunakan bagian belakang formulir ini.			

Bagian IV			
Pernahkah Anda mengajukan keluhan Judul VI dengan agen ini?		Iya	Tidak

Bagian V
Sudahkah Anda mengajukan keluhan ini ke Federal, Negara Bagian, atau lembaga lokal lain, atau dengan pengadilan Federal atau Negara Bagian?
<input type="checkbox"/> Ya <input type="checkbox"/> Tidak
Jika ya, periksa semua yang berlaku:
<input type="checkbox"/> Badan Federal: _____
<input type="checkbox"/> Pengadilan Federal <input type="checkbox"/> Lembaga Negara _____
<input type="checkbox"/> Pengadilan Negeri <input type="checkbox"/> Badan Setempat _____
Harap berikan informasi tentang penghubung di lembaga / pengadilan tempat pengaduan diajukan.
Nama:
Judul:
Agen:
Alamat:
Telepon:
Bagian VI
Nama pengaduan agen menentang:
Orang yang dapat dihubungi:
Judul:
Nomor telepon:

Anda dapat melampirkan materi tertulis apa pun atau informasi lain yang menurut Anda relevan dengan keluhan Anda.

Tanda tangan dan tanggal diperlukan di bawah ini

Tanggal Tanda Tangan

Silakan kirimkan formulir ini secara langsung ke alamat di bawah ini, atau kirimkan formulir ini ke:

Gayle Davis
 Manajer Transit
 201 W Main St ste 11
 Scottsville, KY 42164

Appendix F

Public Participation Plan (PPP)

Introduction

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

Public Participation Goals

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

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

- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

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

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

The public will be invited to provide feedback on the Scottsville Transit website http://www.cityofscottsville.org/citydepartments/scottsville_transit.php and all feedback on the site will be recorded and passed on to Scottsvikmanagement. The public will also be able to call the Scottsville Transit office at 270-239-3239 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Scottsville Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population

- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information

- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

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

Public Hearing

Scottsville Transit has yearly coordination meetings in conjunction with the BRADD Office. We have no major reduction in stops so therefore we have had no public meeting since our initial public meeting to prepare our initial application.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Scottsville Transit operates a transit system within City limits of Scottsville. The Language Assistance Plan (LAP) has been prepared to address Scottsville Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Scottsville Transit service area there are 67 residents or 3.8% who describe themselves as not able to communicate in English "very well" (Source: US Census). Scottsville Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Scottsville Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

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

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

For many LEP individuals, public transit is the principal transportation mode available. It is important for Scottsville Transit be able to communicate effectively with all of its riders. When Scottsville Transit is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Scottsville Transit is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Scottsville Transit undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services

- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Scottsville Transit staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

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

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Scottsville Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Scottsville Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Scottsville Transit to the LEP population.
4. The resources available to Scottsville Transit and overall costs to provide LEP assistance
 - a. **Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 4,144 residents in the Scottsville Transit service area 67 residents describe themselves as speaking English less than “very well”. People of Other Indo-European descent are the primary LEP persons likely to utilize Scottsville Transit services. For the Scottsville Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 100% speak English “very well”.

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

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

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

Scottsville Transit has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that very few LEP individuals in the Scottsville Transit

area. Phone inquiries and staff survey feedback indicated that Scottsville Transit dispatchers and drivers interact very infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Other Indo-European. Over the past few months Scottsville Transit 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.

Scottsville Transit services the government housing areas on its route which house senior residents and low income residents. Many of these residents depend on Scottsville Transit as their primary mode of transportation, and many have expressed to the transit manager their gratitude for having Scottsville Transit at their disposal, because without it they would be “home bound”. This data indicates that Scottsville Transit is very important as a primary means of transportation for its customers.

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

Scottsville Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following Scottsville Police Department/911 Services. Scottsville Transit provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

a. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Scottsville Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 95.1%

of the service area population speaks English only. The largest non-English spoken language in the service area is Other Indo-European (4.9%). Of those whose primary spoken language is Other Indo-European, approximately 0% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Indo-European and who identify themselves as speaking English less than “very well” account for 0% of the service area population.

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

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Scottsville Transit Meetings. This will assist Scottsville Transit in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Scottsville Transit management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

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

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

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

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the Scottsville Transit offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

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

c. Element 3: Training Staff

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

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

In the case of Scottsville Transit , the most important staff training is for Customer Service Representatives and transit drivers. Other Indo-European lessons will be offered to 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

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

e. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated 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 Scottsville Transit financial resources are sufficient to fund language assistance resources needed

Scottville Transit understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Scottsville Transit is open to suggestions from all sources, including customers, Scottsville Transit staff, other transportation agencies with similar experiences

with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

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

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

Appendix H

Operating Area Language Data:

Scottsville Transit Service Area

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total		
Speak only English	3942	
Spanish or Spanish Creole		
Speak English “very well”		
Speak English less than “very well”		
French (incl. Patois, Cajun)		
Speak English “very well”		
Speak English less than “very well”		
French Creole		
Speak English “very well”		
Speak English less than “very well”		
Italian		
Speak English “very well”		
Speak English less than “very well”		
Portuguese or Portuguese Creole		
Speak English “very well”		
Speak English less than “very well”		
German		
Speak English “very well”		
Speak English less than “very well”		
Yiddish		
Speak English “very well”		
Speak English less than “very well”		
Other West Germanic languages		
Speak English “very well”		
Speak English less than “very well”		
Scandinavian languages		
Speak English “very well”		
Speak English less than “very well”		
Greek		
Speak English “very well”		
Speak English less than “very well”		
Russian		
Speak English “very well”		
Speak English less than “very well”		
Polish		
Speak English “very well”		
Speak English less than “very well”		
Serbo-Croatian		
Speak English “very well”		

Language	County	Percent of Population
Speak English less than “very well”		
Other Slavic Languages		
Speak English “very well”		
Speak English less than “very well”		
Armenian		
Speak English “very well”		
Speak English less than “very well”		
Persian		
Speak English “very well”		
Speak English less than “very well”		
Gujarati		
Speak English “very well”		
Speak English less than “very well”		
Hindi		
Speak English “very well”		
Speak English less than “very well”		
Urdu		
Speak English “very well”		
Speak English less than “very well”		
Other Indic languages		
Speak English “very well”		
Speak English less than “very well”		
Other Indo-European Languages	202	
Speak English “very well”	202	
Speak English less than “very well”	0	
Chinese		
Speak English “very well”		
Speak English less than “very well”		
Japanese		
Speak English “very well”		
Speak English less than “very well”		
Korean		
Speak English “very well”		
Speak English less than “very well”		
Mon-Khmer, Cambodian		
Speak English “very well”		
Speak English less than “very well”		
Hmong		
Speak English “very well”		
Speak English less than “very well”		
Thai		

<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Speak English “very well”		
Speak English less than “very well”		
Laotian		
Speak English “very well”		
Speak English less than “very well”		
Vietnamese		
Speak English “very well”		
Speak English less than “very well”		
Other Asian languages		
Speak English “very well”		
Speak English less than “very well”		
Tagalog		
Speak English “very well”		
Speak English less than “very well”		
Other Pacific Island languages		
Speak English “very well”		
Speak English less than “very well”		
Navajo		
Speak English “very well”		
Speak English less than “very well”		
Other Native American languages		
Speak English “very well”		
Speak English less than “very well”		
Hungarian		
Speak English “very well”		
Speak English less than “very well”		
Arabic		
Speak English “very well”		
Speak English less than “very well”		
Hebrew		
Speak English “very well”		
Speak English less than “very well”		
African languages		
Speak English “very well”		
Speak English less than “very well”		
Other and unspecified languages		
Speak English “very well”		
Speak English less than “very well”		

Appendix I

Demographic Maps

Scottsville Transit has not performed Title VI Analysis.

Appendix J

Title VI Equity Analysis

Scottsville Transit has no recent construction project.



Doreen Joyner-Howard, AICP
District Modal Development Manager
Florida Department of Transportation
2198 Edison Avenue, MS 2806
Jacksonville, FL 32204-2730
Phone: (904) 360-5650
Email: doreen.joynerhoward@dot.state.fl.us

Consultant: HDR Engineering, Inc.