

***Federal Transit Administration
Title VI Program***
UGA Transportation & Parking Services

November, 13, 2024

Expires: November, 13, 2027



Transportation & Parking Services

Auxiliary Services

UNIVERSITY OF GEORGIA

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Section 1: Title VI Plan Approval

Title VI Plan Adopted on: November 13, 2024

Adopted by: Macon Athens-Clarke Oconee
Regional Transportation Study
(MACORTS)

Signature(s): _____

Approval:

DRAFT

Section 2: Title VI Policy Statement

Policy Statement

UGA Transportation and Parking Services, operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Georgia Department of Transportation (GDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and GDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. UGA Transportation and Parking Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

UGA Transportation and Parking Services

- UGA Transportation and Parking Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the UGA Transportation and Parking Services.
- For more information on UGA Transportation and Parking Services' civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Qiana Wilson, Title VI Coordinator, UGA Equal Opportunity Office

706-542-7912, (TTY: 711)

Email: ugaeoo@uga.edu;

Or visit our administrative office at

278 Brooks Hall, 310 Herty Drive, Athens, GA, 30602

For more information, visit www.tps.uga.edu

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
 - If information is needed in another language, contact **706-542-7912**.
 - Si se necesita información en otro idioma, comuníquese con **706-542-7912**.

The **UGA Transportation and Parking Services** Notice to the Public is posted in the following locations:

1. On the UGA Transportation & Parking Services website at the following web address www.tps.uga.edu/transit/policies-documents/title-vi-notice
2. In the lobby of the UGA Transportation & Parking Services Campus Transit Facility located at 2505 Riverbend Road, Athens, GA, 30602
3. In the lobby of the UGA Transportation & Parking Services Customer Relations Office located at in Joe Frank Harris Commons, 80 Carlton Street, Athens, GA, 30602
4. In the passenger compartment of all UGA Transportation & Parking Services revenue vehicles

Sample Title VI Notice to the Public in Spanish

Notificación al Público de Derechos Bajo el Título VI

- UGA Transportation and Parking Services opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con UGA Transportation and Parking Services.
- Para obtener más información sobre el programa de derechos civiles o los obligaciones Título VI de UGA Transportation and Parking Services, o para obtener más información sobre los procedimientos para, o a presentar una queja, se pone en contacto con:

**Qiana Wilson, Title VI Coordinator, UGA Equal Opportunity Office
706-542-7912, (TTY: 711)**

Correo electrónico: ugaeoo@uga.edu;

O visite a nuestra oficina administrativa en:

278 Brooks Hall, 310 Herty Drive, Athens, GA, 30602

Para más información, visite a: www.tps.uga.edu

- Para asuntos de transporte relacionados con el Título VI, también se puede presentar una queja directamente ante la Oficina de Igualdad de Oportunidades en el Empleo (Oficina de EEO, en Inglés,) del GDOT: Title VI Liason, 600 West Peachtree Street N.W. Atlanta, Georgia 30308; vía telefónica: 404-631-1972; TTY: 711 o correo electrónico: civilrights@dot.ga.gov

o, a:

- Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Director East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con **706-542-7912**.

Section 4: Title VI Complaint Procedure

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by UGA Transportation and Parking Services may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with UGA Transportation and Parking Services no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, UGA Transportation and Parking Services will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

UGA Transportation and Parking Services has 60 days to investigate the complaint. If more information is needed to resolve the case, the UGA Transportation and Parking Services may contact the complainant requesting further information. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, UGA Transportation and Parking Services can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) 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 letter of finding (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 it must direct the appeal back to the agency. The complainant has 30 days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator. The appeal process information will be included in the letter.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

Qiana Wilson, Title VI Coordinator, UGA Equal Opportunity Office

706-542-7912, (TTY: 711)

Email: ugaeoo@uga.edu;

Or visit our administrative office at

278 Brooks Hall, 310 Herty Drive, Athens, GA, 30602

For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

Or

Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **706-542-7912**.

Sección 4b: El procedimiento de queja del Título VI

Cualquier individuo, grupo de individuos o entidad que crea que han sido discriminados en base a raza, color u origen nacional por los Servicios de Transporte y Estacionamiento de la Universidad de Georgia puede presentar una queja del Título VI por completar y presentar el formulario de queja del Título VI de la agencia.

Si el demandante no puede reducir la queja a la escritura, comuníquese con el Coordinador del Título VI utilizando la información a continuación, y un miembro del personal le ayudará a dictar la queja o proporcionará otra asistencia necesaria.

Cualquier individuo que haya presentado una queja o haya participado en la investigación de una queja no será objeto de ninguna forma de intimidación o represalia. Las personas que tienen motivos para pensar que han sido objeto de intimidación o represalias pueden presentar una queja de represalia siguiendo el mismo procedimiento para presentar una queja de discriminación.

Se debe presentar una queja ante los Servicios de Transporte y Estacionamiento de la Universidad de Georgia a más tardar 180 días después de lo siguiente:

1. La fecha del presunto acto de discriminación; o
2. La fecha en que la(s) persona(s) tuvo(ieron) conocimiento(s) de la supuesta discriminación; o
3. En caso de que haya habido una conducta continuada, la fecha en que se haya interrumpido esa conducta de la última instancia de la conducta.

Una vez recibida la queja, los Servicios de Transporte y Estacionamiento de la Universidad de Georgia la revisará para determinar si nuestra oficina tiene jurisdicción. Una copia de cada queja del Título VI recibida será enviada al Coordinador del Título VI de la agencia. El demandante recibirá una carta de reconocimiento informándole si la queja será investigada por nuestra oficina.

Los Servicios de Transporte y Estacionamiento de la Universidad de Georgia tienen 60 días para investigar la queja. Si se necesita más información para resolver el caso, los Servicios de Transporte y Estacionamiento de la Universidad de Georgia pueden contactar al demandante solicitando más información. El denunciante tiene 10 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de 10 días de negocios, los Servicios de Transporte y Estacionamiento de la Universidad de Georgia pueden cerrar administrativamente el caso.

Después de que el investigador revise la queja, la agencia emitirá una de dos (2) cartas al denunciante: una carta de cierre o una carta de determinación (LOF¹).

¹ Nota de traducción: Letter of Finding (LOF)= carta de determinación

- ✓ Una carta de cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará.
- ✓ Una carta de determinación (LOF) resume las acusaciones y las entrevistas con respecto al supuesto incidente, y explica si se producirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción.

Si el demandante desea apelar la decisión, debe dirigir la apelación de nuevo a la agencia. El demandante tiene 30 días después de la recepción de la carta de cierre o de la carta de determinación para hacerlo. La apelación será investigada y decidida por una parte separada del Coordinador del Título VI. La información del proceso de apelación se incluirá en la carta.

Las quejas escritas del Título VI, o cualquier pregunta relacionada con las protecciones del Título VI, deben enviarse a:

**Qiana Wilson, Coordinador de Título VI, Oficina de Igualdad de Oportunidades de la
Universidad de Georgia**

706-542-7912, (TTY: 711)

Correo electrónico: ugaeoo@uga.edu;

o visite nuestra oficina administrativa en:

278 Brooks Hall, 310 Herty Drive, Athens, GA, 30602

Para asuntos relacionados con el Título VI, una queja también puede ser presentada directamente con la Oficina de Igualdad de Oportunidades de Empleo de GDOT: Enlace del Título VI, 600 West Peachtree Street N.W. Atlanta, GA 30308; por teléfono: 404-631-1972; TTY: 711 o correo electrónico: civilrights-dot.ga.gov

o

Administración Federal de Tránsito, Oficina de Derechos Civiles, Director
East Building, 5th floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Si necesita información en otro idioma, por favor llame **706-542-7912**.

Section 5a: Title VI Complaint Form

**UGA Transportation and Parking Services
Title VI Complaint Form**

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-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):
Title VI: Race Color National Origin
Other (specify): _____
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 Civil Rights related complaint with this agency?	Yes	No
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Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
 Yes No
If yes, check all that apply:
 Federal Agency: _____
 Federal Court _____ State Agency _____
 State Court _____ Local Agency _____

If marked Yes in Section V, 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:

**UGA Transportation & Parking Services
 ATTN: Qiana Wilson, Title VI Coordinator
 278 Brooks Hall
 310 Herty Drive
 Athens, Georgia, 30602
 706-542-7912
 ugaeeo@uga.edu**

Section 5b: Title VI Complaint Form (Spanish)

Servicios de Transporte y Estacionamiento de la Universidad de Georgia

Formulario de queja del Título VI

Sección I:				
Nombre y apellido:				
Dirección:				
Teléfono (Hogar):			Teléfono (Trabajo):	
Correo Electrónico:				
¿Requisitos de formato accesible?	Letra grande		Grabación de audio	
	TDD ²		Otro	
Sección II:				
¿Está presentando esta queja en su propio nombre?			Sí*	No
*Si respondió "sí" a esta pregunta, pase a la Sección III.				
De lo contrario, proporcione el nombre y la relación de la persona por la que presenta la queja:				
Explique por qué ha solicitado a un tercero:				
Confirme que ha obtenido el permiso de la parte agraviada si presenta la solicitud en nombre de un tercero.			Sí	No

² ** Nota de traducción: Dispositivo de telecomunicación para personas sordas.

Sección III:		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):		
Título VI: <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad		
Otros (especifique): _____		
Fecha de la supuesta discriminación (mes, día, año): _____		
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si se conocen), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.		

Section IV		
¿Ha presentado previamente una queja del Título VI con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Section V		
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No		
En caso afirmativo, marque todo lo que corresponda:		
<input type="checkbox"/> Agencia Federal: _____		
<input type="checkbox"/> Corte Federal: _____	<input type="checkbox"/> Agencia Estatal: _____	
<input type="checkbox"/> Corte Estatal: _____	<input type="checkbox"/> Agencia Local: _____	
Proporcione información sobre una persona de contacto en la agencia/corte donde se presentó la queja.		
Nombre y apellido:		
Título:		
Agencia:		

Dirección:
Teléfono:
Sección VI
Nombre de la agencia contra la que se presenta la queja:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Se requieren la firma y la fecha a continuación

Firma

Fecha

Favor de entregar este formulario en persona o a través del correo a la dirección a continuación:

**UGA Transportation & Parking Services
ATTN: Qiana Wilson, Title VI Coordinator
278 Brooks Hall
310 Herty Drive
Athens, Georgia, 30602
706-542-7912
ugaeo@uga.edu**

Section 6: List of Title VI Investigations, Complaints and Lawsuits

The UGA Transportation and Parking Services maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.		Nothing to Report		
2.				
Lawsuits				
1.		Nothing to Report		
2.				
Complaints				
1.		Nothing to Report		
2.				

Section 7: Public Participation Plan

UGA Transportation and Parking Services' Public Involvement Philosophy

UGA Transportation and Parking Services welcomes and values public involvement. GDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps UGA Transportation and Parking Services better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- UGA Transportation and Parking Services proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Implement a public involvement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Strategies and Desired Outcomes

To promote inclusive public participation, UGA Transportation and Parking Services will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement

- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, UGA Transportation and Parking Services has also employed these specific strategies or activities:

- Direct engagement with the UGA Student Government Association (SGA) to review service needs and student requirements.
- Coordination with UGA Multicultural Services and Programs to guide outreach to multicultural student organizations.
- Coordination with the UGA Disability Resource Center to assist in outreach to students with disabilities.
- Transportation & Parking Services staff participate in Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) advisory committee meetings where the public attends and provides feedback.

Public Outreach Activities

UGA Transportation & Parking Services staff regularly participate in a variety of community outreach activities. This includes attending orientation sessions for new students, campus events, and community functions upon request.

UGA Transportation & Parking Services also maintains a robust online presence as a means of soliciting public feedback. Service notifications are posted to the UGA Transportation & Parking Services website www.tps.uga.edu as well as on various social media platforms. Additionally, written feedback is collected using a web-based service management ticket system to track public comments and direct them to the appropriate staff member.

Section 8: Four Factor Analysis and LEP Data

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

UGA Transportation and Parking Services will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by UGA Transportation and Parking Services

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

UGA Transportation and Parking Services service area encompasses the Athens Census County Division (CCD). Home to 91,615 people spread over 63.6 square miles, the service area's population speaks 11 different language groups. However, the overall numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 91,615, 3,129, or 3.42% of the population of residents, report speaking English

less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	Athens CCD, Clarke County, Georgia	
Label	Estimate	Percentage
Total:	91,615	
Speak only English	78,658	85.86%
Speak Spanish, and English less than "very well"	1,658	1.81%
Speak French, Haitian, or Cajun and English less than "very well"	99	0.11%
Speak German or other West Germanic languages, and English less than "very well"	19	0.02%
Speak Russian, Polish, or other Slavic, and English less than "very well"	155	0.17%
Speak Other Indo-European, and English less than "very well"	155	0.17%
Speak Korean , and English less than "very well"	144	0.16%
Speak Chinese (incl. Mandarin, Cantonese), and English less than "very well"	288	0.31%
Speak Vietnamese, and English less than "very well"	4	0.00%
Speak Tagalog (incl. Filipino), and English less than "very well"	0	0.00%
Speak Other Asian and Pacific Island languages, and English less than "very well"	465	0.51%
Speak Arabic, and English less than "very well"	142	0.15%
Speak Other and unspecified languages, and English less than "very well"	0	0.00%

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice's Safe Harbor Provision. This provision outlines circumstances that can provide a "safe harbor" for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient's written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Athens-Clarke County is home to 1,658 people (1.81% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, UGA Transportation and Parking Services designates the following as Vital Documents which be translated to Spanish. Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Complaint Form, Reasonable Modification Request Form and, Paratransit Eligibility Form.

Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.

UGA Transportation and Parking Services recognizes the importance of taking measures to gauge LEP needs. Front-line staff are instructed to report to dispatchers or supervisors any instances of interactions with individuals who speak English less than well and require translation assistance. Administrative staff will log these interactions to gauge the frequency of interactions with LEP individuals.

UGA Transportation & Parking Services reports approximately one (1) interaction per month with an individual who requires language assistance.

Factor Three: The Importance of the Agency's Service to People's Lives

UGA Transportation and Parking Services delivers services which likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations. Some LEP persons are immigrants with no legal way to access a driver's license at this time. Additionally, our services provide access to campus services and parking, reducing congestion and traffic on the UGA Campus and in Downtown Athens.

Finally, UGA Transportation and Parking Services' planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that UGA Transportation and Parking Services has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, UGA Transportation and Parking Services staff members who speak Spanish or any other foreign languages can be consulted or utilized for translation or interpretation in informal or emergency situations. In the event assistance in a rare language is needed, UGA

Transportation and Parking Services utilizes the services of the UGA Franklin College of Arts and Sciences Foreign Language Departments to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning an interpreter is needed.

Finally, UGA Transportation and Parking Services will pay for document translation services when needed, which generally costs about \$25-\$35 per page. For example, the Spanish translation of vital documents included in this Program were completed by a paid professional.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, UGA Transportation and Parking Services is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **UGA Transportation and Parking Services'** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Results: LEP Populations Served

Item #1 – Four Factor Analysis Results: LEP Populations Served

	Athens CCD, Clarke County, Georgia	
Label	Estimate	Percentage
Total:	91,615	
Speak only English	78,658	85.86%
Speak Spanish, and English less than "very well"	1,658	1.81%
Speak French, Haitian, or Cajun and English less than "very well"	99	0.11%
Speak German or other West Germanic languages, and English less than "very well"	19	0.02%
Speak Russian, Polish, or other Slavic, and English less than "very well"	155	0.17%
Speak Other Indo-European, and English less than "very well"	155	0.17%
Speak Korean , and English less than "very well"	144	0.16%
Speak Chinese (incl. Mandarin, Cantonese), and English less than "very well"	288	0.31%
Speak Vietnamese, and English less than "very well"	4	0.00%
Speak Tagalog (incl. Filipino), and English less than "very well"	0	0.00%
Speak Other Asian and Pacific Island languages, and English less than "very well"	465	0.51%
Speak Arabic, and English less than "very well"	142	0.15%
Speak Other and unspecified languages, and English less than "very well"	0	0.00%

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The UGA Transportation and Parking Services has identified, developed, and uses the following:

- a) The Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Complaint Form, Reasonable Modification Request Form and, Paratransit Eligibility Form are designated as vital documents and are translated into Spanish.
- b) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- c) The UGA Transportation and Parking Services has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- d) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of UGA Transportation and Parking Services’ language assistance measures, UGA Transportation and Parking Services provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.
- The agency’s website includes language stating, “If you need assistance or information in another language, please contact 706-542-7912.” This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

UGA Transportation and Parking Services will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and

updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the UGA Transportation and Parking Services service area.

Updates will continue to include 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 local language assistance programs have been effective and sufficient to meet the need.
- Determine whether UGA Transportation and Parking Services' financial resources are sufficient to fund language assistance resources needed.
- Determine whether UGA Transportation and Parking Services has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning UGA Transportation and Parking Services' failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will be provided to UGA Transportation and Parking Services staff:

- Information on the UGA Transportation and Parking Services Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

“I Speak” Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyè vò bieát ñoïc vaø noui ñõõic Vieät Ngöõ.	Vietnamese
	당신이 한국어 말할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i> Nothing	Service Requested to	Follow Up Required Report	Staff Member Providing Assistance	Notes

DRAFT

Section 10: Minority Representation Information

UGA Transportation and Parking Services does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

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Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names.

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Section 12: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “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. Has the agency built a facility?

- No, the agency has not built a facility.

Section 13: Fixed Route Transit Providers Service Standards and 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.

UGA Transportation and Parking Services:

is a fixed route transit provider

is **not** a fixed route transit provider

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:

UGA Transportation and Parking Services has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. UGA Transportation and Parking Services has prepared standards for fixed-route bus service.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
15' Mini-Bus	14	0	14	1.0
30-35' Cut-Away Bus	29	5	34	1.1
40' Low Floor Bus	35	45	80	2.2
40' Low Floor Electric Bus	38	27	65	1.7

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION						
Service Type	Peak	Base	Evening	Night	Weekend	Reduced
Circulator	12	10	20	--	--	30
Commuter	15	25	30	--	--	30
Night & Weekend	--	--	20	25	25	--
Peak Period Only	15	--	--	--	--	--

Service Types are defined in sub-part c.

** Peak: 7-9:30 am and 2:30-6 pm; Base 9am – 2:30pm; Evening: 4-9:30 pm; Night: 9:30pm-3:30am; Weekend: Saturday/Sunday; Reduced: Periods of Reduced Campus Activity*

"--" means no service is provided during that time period.

c. Service Types

- 1. Circulator:** Route that operates primarily within the confines of the UGA Main Campus. These routes connect major activity centers on campus. These routes provide baseline service on the University of Georgia campus. Circulator routes operate on an interval headway system. *UGA Transit Circulator Routes include: Bulldog Housing, Cross Campus Connector, Central Loop, East Campus Shuttle, Milledge Avenue, North South Connector, and West Campus Shuttle.*
- 2. Commuter:** Routes that connect regional destinations to activity hubs on main campus. These may include Park & Ride Lots, Satellite Campuses/Facilities within the Greater Athens region, or Student Housing Complexes. Commuter routes may operate on a fixed-schedule. *UGA Transit Commuter Routes include: Health Sciences, Riverbend Connector, Park & Ride, and Vet Med.*

3. **Night & Weekend:** Routes that provide coverage service during lower ridership hours. These routes connect university housing and dining facilities as well as other hubs of campus activity. These routes operate on a fixed-schedule. *UGA Transit Night/Weekend Routes include: Night Campus, Prince-Milledge, and Weekender.*
4. **Peak Period Only:** Routes that operate limited trips, only during peak demand times, typically in the morning and afternoon periods. These services connect Main Campus to off-campus Park & Ride Lots. *UGA Transit Peak Period Routes: UGA Transportation & Parking Services does not currently operate any Peak Period Service.*

d. On-Time Performance

UGA Transportation and Parking Services utilizes two methods to measure on time performance depending on the type of service. For interval-based services, a vehicle is considered on time if it is within a three (3) minutes in either direction from the pre-determined headway based on the number of buses in service at a given time. Routes using this system maintain a service interval of eight (8) minutes or less during the service day. For schedule-based services, a vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. UGA Transportation and Parking Services' on-time performance objective is 75% or greater. UGA Transportation and Parking Services continuously monitors on-time performance and system results are compiled in monthly performance reports covering all aspects of operations.

e. Service Availability

UGA Transportation and Parking Services will distribute transit service so that 85% of all residents in the service area are within a ¼ mile walk of bus service.

Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. UGA Transportation and Parking Services has prepared the following policies for its transit system.

a. Major Service Changes

Major service changes may occur up to three times per year and will be scheduled to coincide with the start of the Fall, Spring, or Summer academic semesters. UGA Transportation & Parking Services staff will conduct formal outreach in conjunction with the UGA Student Government Association prior to the implementation of any major service change. This will include the substantive realignment of routes, addition of bus stops, or significant changes to service hours.

b. Minor Service Changes

Minor adjustments occur as needed and should only be used to correct unexpected problems. For minor changes notices will be placed on board all buses as needed.

c. Distribution of Transit Amenities

Installation of transit amenities along bus and rail routes are based on the number of passengers boarding at stops and stations along those routes.

d. Vehicle Assignment

UGA Transportation & Parking Services regularly replaces revenue vehicles such that the average age of the fleet does not exceed “14” years. All 40-foot buses are low-floor buses and are deployed on all services which support the use of a full-size bus. All buses are also equipped with air conditioning and automated stop announcement systems.

Bus assignments take into account the operating characteristics of buses of various lengths and propulsion types, which are matched to the operating characteristics of the route. Routes with lower ridership may be assigned 30-foot or 35-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 15-foot rather than 40-foot buses. Circulator routes are typically assigned 40-foot low floor electric buses to better match run length with range characteristics.