2022

TITLE VI & NONDISCRIMINATION PLAN

11/08/2022

Liberty County Board of County Commissioners/ Liberty County Transit

Title VI and Nondiscrimination Policy and Plan
Including Limited English Proficiency (LEP)

The Liberty County Board of County Commissioners/Liberty County Transit assures the Federal Transit Administration and 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, the Florida Civil Rights Act of 1992, as well as other applicable Federal statutes, 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.

Prepared by
Monica Welles

Updated: November 11, 2022

Title VI Program Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person	Remarks
01/19/2020	Update	Monica Welles	Yearly Review/Update
02/05/2021	Update	Monica Welles	Yearly Review/Update
01/10/2022	Update	Monica Welles	Yearly Review/Update
10/7/2022	Update Census data, language, and website information	Monica Welles	Plan Review/Update
11/10/2022	Board Review	Monica Welles	Board Review

I. Title VI Policy Statement

The Liberty County Board of County Commission/Liberty County Transit's (Liberty County Transit) abides by both the Federal Transit Administration (FTA) and the Florida Department of Transportation's (FDOT) Title VI/Nondiscrimination Programs. As a result, it is the policy of this agency, under Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-Aid Highway Act of 1973; Civil Rights Restoration Act of 1987; the Florida Civil Rights Act of 1992, and related statutes and regulations, that no person in the United States shall, on the basis of race, color, national origin, sex, age, disability/handicap, or income status, family or religious status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by this agency or its sub-recipients.

II. Compliance Plan – General Requirements:

A. Title VI Notice to the Public, including a list of locations where the notice is posted:

The following is Liberty County Transit's Title VI and Non-Discrimination Notice to the Public:

Florida Law and Title VI of the Civil Rights Act of 1964 Prohibits Discrimination in:

Public accommodations on the basis of race, color, religion, sex, national origin, handicap, or of marital status.

Persons believing they have been discriminated against on these conditions may file a complaint with the Florida Commission on Human Relations at 850-488-7082 or 800-342-8170 (voice messaging).

For more information on the Liberty County Board of County Commissioners/Liberty County Transit Civil Rights program, and the procedures to file a complaint about the transportation program contact the Title Vi Liaison at:

Monica Welles
Executive Director
Liberty County Transit
(850) 643-2524

Notice to the Public is located in the following areas:

- Each Vehicle
- Drivers Office
- Dispatchers Office
- Employment Applications
- Any Bidding or Advertising
- Brochures
- County Website: www.libertycountyfl.org

B. Title VI Complaint Procedures (i.e. instructions to the public regarding how to file a Title VI discrimination complaint)

Liberty County Transit has a Complaint Procedure developed in compliance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients". This Procedure is included in Appendix A.

C. Title VI Complaint Form

Liberty County Transit has a Complaint Form developed in compliance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients". This Form is included in Appendix B.

D. List of Transit-related Title VI investigations, complaints, and lawsuits

There have not been any investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities. If there is a Title VI complaint in the future, Liberty County Transit will follow the Complaint Procedure in Appendix A. In addition, this complaint will be properly reported. This report shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

E. Public Participation Plan

(Activities are approximate over the last 3 years)

- Brochures are regularly placed at community gathering places as well as local doctors' offices and the hospital (See Appendix C).

- Healthy Start (translator) is updated with any changes affecting ridership as well as reviewing periodically our processes and placement of brochures.

- Advertisement in the Calhoun-Liberty Journal for Jobs, Activities, and Events for Transportation.

- (Monthly) Our Local radio station (WYBT/WPHK) advertises and also lists within our local grocery store, on announcements, of the activities placed in the Calhoun Liberty Journal

- Hurricane Preparedness outreach to the public, providing hurricane readiness supplies, and information.

- Department of Health public health awareness events. We provide information, give out brochures, and answer any questions.

- Community Awareness events outreach to the public, providing brochures, cards, and information.

- While Scheduling rides with passengers

- Mobility Week

- Liberty County Transits page on the county website (www.LibertyCountyFl.org)

F. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance:

Liberty County Transit's Limited English Proficiency (LEP) Plan:

In order to ensure meaningful access to our services, the following Four Factor Analysis was completed.

1. *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*

   According to the US Census Bureau 2021, (Quick facts) the total population aged 5 years and older included 7900 residents within the entire Liberty County area 5.1% speak languages other than English in the home.

2. *The frequency with which LEP persons come into contact with the program.*

   Though infrequent, LEPs contact us through the Health Start services that have a

translator on staff. Any LEP person that is having difficulty speaking or understanding is referred to the translator or the translator is contacted to reach out to the individual.

3. *The nature and importance of the program, activity, or service provided by the program to people's lives.*

   Liberty County Transit provides paratransit subscription, demand response, and reservation transportation services for all of Liberty County and its transportation-disadvantaged populations. There are no fixed routes available in Liberty County.

4. *The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

   Currently, we partner with our Healthy Start Program within the county which has a Spanish translator available to help with any Spanish-speaking needs.

If any LEP language group reaches the five percent trigger or 1,000 persons (from Census data), translated vital documents will be provided in the applicable language, and/or oral interpretation services will be provided upon request. Liberty County Transit will at that time formalize an LEP Plan as a separate document to this Title VI policy.
In the interim, Liberty County Transit staff members will continue to attend community outreach events; ensure appropriate postings in vehicles; continue coordination with operators, office staff, and drivers as they are most likely to interact with the public; continue to update/train available interpreters (Healthy Start) on services, including changes to services, etc. If any of these action items or an update in Census data reflects a change in the potential ridership that may require a more comprehensive LEP plan, Liberty County Transit will develop this plan.

G. Non-Elected Committees and Councils, broken down by race, and agency

Currently, the makeup of Liberty County is as follows (2021 data):

	RACE					ETHNICITY		SEX	
Census Area	***White Alone***	***Black/African American***	***Asian Alone***	***American Indian/ Alaskan Native***	***2 or More Races***	***Hispanic***	***Non-Hispanic***	***Male***	***Female***
Liberty	76.4%	20.1%	0.5%	1.2%	1.8%	7.3%	70.3%	62.2%	37.8%

Based on 2018 Census Data

Local Coordinating Board

Liberty County Board of County Commission/Liberty County Transit is a direct recipient of funding. The BOCC does not have a designated transportation non-elected board at this time.

H. 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

We currently do not have sub-recipients, however, if that changes, they will submit an agreement to follow the Liberty County Transit's Title VI Plan.

I. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

Liberty County Maintenance Shop. The Maintenance Shop was built on our current site location, next to our former maintenance shop so an Analysis was deemed not needed as it would not change any effects on any groups according to this plan. In addition, any future construction site related to Liberty County Transit will have an Equity Analysis if needed, to ensure the location does not disproportionally affect any group according to this Title VI plan.

J. Board Minutes, Resolution, and other appropriate documentation showing the Board of Directors reviews and approved the Title VI Program

Please see Appendix D.

Conclusion

Liberty County Transit firmly believes in the Title VI and the non-discriminatory statement "no person in the United States shall, on the ground of race, color, or national origin, age, disability, family or religious status, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Liberty County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI and the non-discrimination policy.

Appendix A

LIBERTY COUNTY BOARD OF COUNTY COMMISSIONERS/LIBERTY COUNTY TRANSIT (LIBERTY COUNTY TRANSIT) TITLE VI COMPLAINT AND NON-DISCRIMINATION POLICY

The purpose of this document is to detail specific complaint procedures for better documentation efforts regarding to Title VI and related statutes.

The Liberty County Board of County Commissioners/Liberty County Transit assures the Federal Transit Administration and 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, the Florida Civil Rights Act of 1992, as well as other applicable Federal statutes, 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.

The Liberty County Board of County Commissioners/Liberty County Transit does not condone discrimination and believes all persons should be protected based on the above listed criteria and will not be excluded from participation in, being denied benefits of, or be subject to discrimination under Liberty County Board of County Commissioners/Liberty County Transit transportation activities.

LIBERTY COUNTY TRANSIT COMPLAINT PROCEDURE

Any person who believes she or he has been discriminated on the basis of race, color, or national origin by the Liberty County Board of County Commissioners/Liberty County Transit (further referred to as Liberty County Transit) may file a complaint by completing and submitting the agency's complaint form. This form is available in our offices, can be mailed or emailed on request, and will be added to our website if we decide to develop one.

The Liberty County Transit investigates complaints received no more than 180 days after the alleged incident. The Liberty County Transit will process complaints that are complete. Once the complaint is received, the Liberty County Transit will review it to determine if the information is complete.

If more information is needed to resolve the case, the Liberty County Transit may contact the complainant. The complainant has 7 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 7 business days, the Liberty County Transit can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue a written notice to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the information 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 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

According to the 2010 Census data, our service area does not meet the Safe Harbor threshold of 5% (or over 1,000) for any LEP language group. However, if that should change in the future, we will provide the procedure and complaint form in the applicable language if needed.

Appendix B

Complaint of Discrimination

The Liberty County Board of County Commissioners/Liberty County Transit abides by both the Federal Transit Administration and the Florida Department of Transportation's Title VI/Nondiscrimination Programs. As a result, it is the policy of this agency, under ***Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-Aid Highway Act of 1973; Civil Rights Restoration Act of 1987***; ***the Florida Civil Rights Act of 1992,*** and related statutes and regulations, that no person in the United States shall, on the basis of race, color, national origin, sex, age, disability/handicap, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by this agency or its sub-recipients.

Section I:

Complainant(s) Name:			
Complainant(s) Address:			
Telephone (Home):	Telephone (Work):	Email Address:	
Accessible Format Requirements?	Large Print ☐ TDD ☐	Audio Tape ☐	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 for:	Name:	Relationship:
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):

Date of Alleged Discrimination:

☐ Race ☐ Color ☐ National Origin
☐ Sex ☐ Age ☐ Handicap/Disability
☐ Income Status ☐ Retaliation ☐ Other

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 witness. If more space is needed, please use 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?	Yes ☐	No ☐

If yes, check all that apply:

☐ Federal Agency: _____ ☐ State Agency: _____ ☐ Local Agency: _____
☐ Federal Court: _____ ☐ State Court: _____

Section VI

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

Name:	Title:

Agency:	Telephone:
Address:	
You may attach any written materials or other information that you think is relevant to your complaint.	
Complainant(s) or Complainant(s) Representatives Signature:	**Date of Signature:**

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

Liberty County Transit
Monica Welles, Title VI Coordinator
P.O. Box 399, Bristol, FL 32321
(850) 643-2524 or Fax (850) 643-5672
Libertyt@gtcom.net

Internal Use Only:	
Date Received by Staff:	**Date Investigation Completed:**

Appendix C

our MISSION

Liberty County Transit will strive to deliver coordinated transportation services in Liberty County. We shall operate as safely as possible. All personnel and contractors are charged with the safety of employees, property, passengers, and those who come in contact with the transit system.

Liberty County TRANSIT

is powered by the

Liberty County
Board of County Commissioners

in partnership with

FDOT

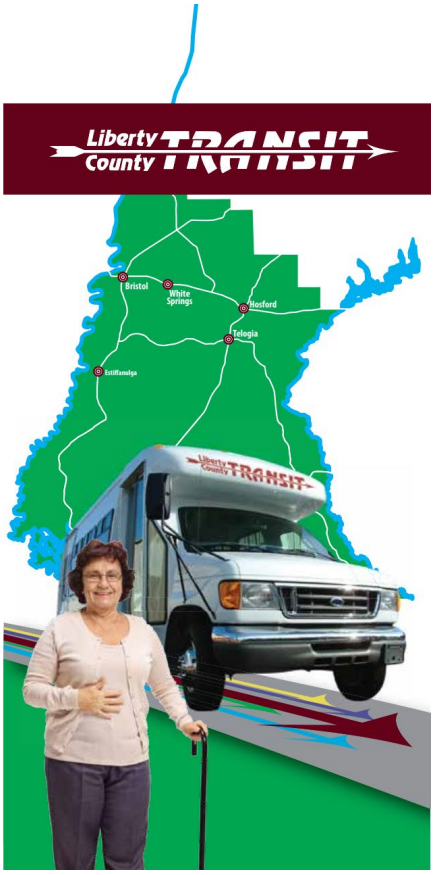
Questions?

Call Liberty County Transit at (850) 643-2524.

Florida Law and Title VI of the Civil Rights Act of 1964 prohibits discrimination in public accommodation on the basis of race, color, religion, sex, national origin, handicap, or of marital status. Persons believing they have been discriminated against on these conditions may file a complaint with the Florida Commission on Human Relations at 850-488-7082 or 800-342-8170 (voice messaging).

This brochure was developed in partnership with

COMMUTER SERVICES | of north florida
888-454-RIDE / www.commuterservices.org



Locations of Brochures:

Pan Care

Liberty Community HealthCare

Buy Rite Drugs

Liberty County EMS

Liberty County Libraries

Piggly Wiggly Board

Post Office Board

Liberty County Clerk of Court

Liberty County Tax Collectors

Liberty County Property Appraisers

Liberty County Department of Health

Liberty County Supervisors of Elections

Appendix D

Liberty County Board of County Commissioners Approved the Title VI plan at the November 2, 2022 Meeting. Minutes are available at the Liberty County Board of County Commissioners Website. A link has been provided below.

'LCBOCC' Agenda Show (towncloud.io)