

**City of Jackson  
Title VI Program**



**Transit Services Division**

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## **INTRODUCTION**

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

“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.”

The objectives of the Title VI requirements assist FTA funding recipients to:

- 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.
- 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.
- Insert the clauses of contractor and subcontractor compliance.
- Develop a complaint process and attempt to resolve complaints of discrimination against the City of Jackson/Transit Services.
- Participate in training offered on the Title VI and other nondiscrimination requirements.
- If reviewed by the Federal Transit Administration (FTA) 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.
- Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
- Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

To fulfill this requirement, The City of Jackson, Transit Services Division has compiled this Title VI document for submission to the Federal Transit Administration (FTA), Region IV.

The City of Jackson, Transit Services Division is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

For more information contact:

**Office of Personnel Management  
1000 Metrocenter, Ste. 102  
Jackson, MS 39209**

**Telephone: 601-960-1327**

**Fax: 601-960-1187**

## **REQUIREMENT TO PROVIDE TITLE VI ASSURANCES**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA will be accompanied by an assurance that the applicant will maintain compliancy with DOT's Title VI regulations. The City of Jackson's annual and Assurances are signed/pinned in the FTA TEAM-Web system.

The City of Jackson, Transit Services Division (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act:, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Sub Title A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, 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 for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) (1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to any FTA program:

1. That the Recipient agrees that each "program" and each "facility as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all U.S. Department of Transportation Programs and, in adapted form in all proposals for negotiated agreements:

The City of Jackson, Transit Services Division, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Sub Title A, Office the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation issued pursuant to such Act, herby notifies all bidden that it will affirmatively insure that in any contact entered into

pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of **Appendix A** of this assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of **Appendix B** of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in **Appendix C** of this assurance, as a covenant running with the land, in any future deeds, lease, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under any FTA program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under any FTA program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvement thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient Department of Transportation under any Federal Transit Administration program and is binding on it, other recipients, contractors, subcontractors, transferees, successors in interest and other participants in any FTA program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

Dated \_\_\_\_\_

\_\_\_\_\_  
(Recipient)

by \_\_\_\_\_  
Tony T. Yarber, Mayor  
City of Jackson, MS

## **REQUIREMENTS FOR FIRST-TIME APPLICANTS**

The City of Jackson, Transit Services Division is not a first time applicant. This section is not applicable.

### **Title VI Notice to the Public**

It indicates that the City complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. A copy of this notice is located in **Appendix D**. Notice posts are located in but not limited to the City of Jackson’s website, public areas of Transit Services Office, Jatran facilities (e.g., headquarters, transit shelters and stations, etc.) and on transit vehicles (e.g., buses, etc.).

If any of the Limited English Proficient (LEP) populations in the City of Jackson meet the Safe Harbor threshold, then the Notice should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. At a minimum, the statement in the Notice will read – “If information is needed in another language, then contact [phone number].” This will be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

Efforts are made to engage in dialogue with minority and low-income communities: The Equal Business Officer (EBO) speaks to various minority groups as part of the division’s outreach efforts. The groups include ADA organizations and minority contractors. The City also holds Ward meetings and has a Constituent Services Department that addresses all citizens’ concerns on a continual basis. Citizens may also dial 3-1-1 for non-emergency City services or file a service request online through the City’s webpage.

#### **Introduction**

As a recipient of federal funds, The City of Jackson, Transit Services Division is required to comply with Title VI of the Civil Rights Act of 1964 and must take reasonable steps to ensure meaningful access to the information and services it provides. Title VI prohibits agencies receiving federal funds from discriminating against anyone or any group in the United States on the grounds of race, color, national origin, sex, age or disability.

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to certify Title VI of the Civil Rights Act of 1964. It was intended to improve access to federally, conducted and assisted programs for persons who are LEP by:

- Publishing guidance on how their recipients can provide access to LEP persons;
- Improving the language accessibility of their own programs;

- Breaking down language barriers by implementing consistent standards of language assistance among all recipients of federal financial assistance.

## **TITLE VI COMPLAINT PROCEDURES**

### **Introduction**

The Title VI (and related statutes) discrimination complaint procedures are intended to provide aggrieved persons an avenue to raise complaints of discrimination regarding the City of Jackson's Transit Services Division programs, activities and services as required by statute.

### **Purpose**

The purpose of the discrimination complaint procedures is to describe the process used by the Office of Civil Rights (OCR). These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination in Employment Act of 1967, Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, Executive Order 12898 Environmental Justice, Executive Order 13166 Limited English Proficiency and applicable Department policies. Any person who feels that he or she has been subjected to discrimination on the basis of race, color national origin, gender, age, disability, or because they are low income, has the right to file a complaint with the Department's Office of Civil Rights.

Title VI complaints must be filed within 180 days of the alleged discriminatory event or practice. Complaints must be filed in person or in writing. They should be directed to:

City of Jackson  
Personnel Management  
Attn: Title VI Officer  
1000 Metrocenter, Ste. 102  
Jackson, MS 39209

Phone: 601.960.1050

### **Complaint Processing**

#### **Initial Contact**

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI of the Civil Rights Act of 1964 may file a complaint with the City of Jackson.

- All complaints, alleging a violation under Title VI will be referred to the Title VI Coordinator at 601.960.1050. Refer to **Appendix E** – Title VI Complaint Form.
  - A. The Coordinator will maintain a database for Title VI complaints to include: Contact information of the complainant;
  - B. Basis of the complaint (race, color, national origin);
  - C. Date(s) on which the alleged discriminatory event(s) occurred;
  - D. Nature of the incident that led the complainant to feel discrimination was a factor;
  - E. Contact information of persons who may have knowledge of the event;
  - F. Other agencies or courts where complaint may have been filed and contact name;
  - G. Complainants' signature and date.

### The Complaint Review Process

1. The Department of Personnel Management reviews the complaint upon receipt to ensure that relevant information is provided, the complaint is timely, and meets jurisdiction.
2. The complaint shall be investigated unless:
  - The complaint is withdrawn.
  - The complaint fails to provide required information after numerous requests
  - The complaint is not filed timely.
  - Any issues that do not involve discrimination, or are not based on a protected basis will be directed to the appropriate entity. Under no circumstance is the complaint discouraged from filing a complaint.
3. Upon determination that the complaint warrants an investigation: The complainant is sent a letter, acknowledging receipt of the complaint, the name of the investigator, and is provided with his/her rights under Title VI and related statutes.
4. The respondent is notified by mail that he/she has been named in a complaint and is provided with his/her rights under Title VI and related statutes. The letter also reveals the investigator's name and informs the respondent that he/she will be contacted for an interview.
5. A letter is sent to the appropriate manager when the complainant(s) or respondent(s) are located in a Region office. Program managers will be informed that a complaint was filed; the letter will list the names of the parties involved, the basis of the complaint and the assigned investigator.



## Investigation

### 1. **Investigation Plan**

The investigator shall prepare a written plan, which includes, but is not limited to the following:

- Names of the complainant(s) and respondent(s);
- Basis for the complaint;
- Issues, events or circumstances that cause the person to believe that he/she has been discriminated against;
- Information needed to address the issue;
- Criteria, sources necessary to obtain the information;
- Identification of key people;
- Estimated investigation time line;
- Remedy sought by complaint(s).

### 2. **Conducting the Investigation**

- The investigation will address only those issues relevant to the allegations in the complaint.
- Confidentiality will be maintained as much as possible.
- Interviews will be conducted to obtain facts and evidence regarding the allegations in the complaint. The investigator will ask questions to elicit information about aspects of the case, which the witness can provide firsthand information.
- Interviews can be tape recorded with the interviewees consent.
- A chronological contact sheet is maintained in the case file throughout the investigation.

### 3. **Investigation Reporting Progress**

- Within 30 days of receiving the complaint, the investigator prepares an investigation report and submits the report and supporting documentation to the Department of Personnel Management for review.
- The Department reviews the file and investigation report. Subsequent to the review, a final determination of “probably cause” or “no cause” is made and a final decision letter for signature is prepared.
- A written report shall be prepared outlining the following complaint details
  - (a) Date of written complaint;
  - (b) Complaint basis (race, color, national origin).

A copy of the complaint, together with a copy of the report of investigation, is forwarded to the appropriate federal agency Federal Transit Authority (FTA) within 60 days of the date the

complaint was received. Records shall be kept for three years internally then archived for a period of ten years.

## **RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITES**

There have been no investigations, complaints nor lawsuits filed since the time of the last Title VI submission.

## **MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

Not applicable.

## **PROVIDING ASSISTANCE TO SUBRECIPIENTS**

As the primary recipient, the City of Jackson will provide the following information, at minimum to JATRAM:

- Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.
- Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
- Any other recipient-generated or obtained data, such as travel patterns, surveys, etc., that will assist subrecipients in complying with the Title VI.

## **MONITORING SUBRECIPIENTS**

As the primary recipient, the City of Jackson will monitor subrecipients by:

1. Documenting its process for ensuring that all subrecipients are complying with the general reporting requirements of the circular, as well as other requirements that apply

to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.

2. Review Title VI Programs to ensure subrecipients are in compliance.

### **Contractors and Subcontractors**

The City of Jackson, Transit Services 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. The City of Jackson, Transit Services, 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 nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

### **DETERMINATION OF SITE OR LOCATION OF FACILITIES**

For future projects, The City of Jackson/JATRAN will give attention to site selection of facilities to make sure the location is selected without regard to race, color, or national origin. If the City of Jackson/JATRAN determines that the location of the project will result in a disparate impact on the basis of race, color or national origin, the City/JATRAN will only locate the project in that location if there is a substantial legitimate justification for locating the project there.

### **REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST**

The City of Jackson/JATRAN will comply by providing FTA with information as requested.

### **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 the City of Jackson, Transit Services was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations are encouraged to participate in the decision making process for the City of Jackson. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The information provided in the PPP is designed to provide the public with convenient methods for receiving and considering public comment. The PPP is included as **Appendix F** to the Title VI Plan.

### **Current Outreach Efforts**

The City of Jackson, Transit Services is required to submit a summary of public outreach efforts made over the last three (3) years. There have been no outreach efforts in the past three years, however, the City of Jackson; Transit Services plan to participate in outreach efforts in the near future.

## **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).

The City of Jackson, Transit Services operates a transit system within the Hinds County Metro Area. The Language Assistance Plan (LAP) has been prepared to address the City of Jackson, Transit Services 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 the City of Jackson's service area there are 4,224 residents or 2.44% who describe themselves as not able to communicate in English very well (Source: US Census). The City of Jackson 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. The City of Jackson 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**.

## **SYSTEM-WIDE SERVICE STANDARDS AND POLICIES** **PTM of Jackson Doing Business As JATRAM**

To comply with FTA regulations in adopting system-wide services standards and policies to guard against any services design or operational decision that may have a disproportionate impact on minority or low-income populations. JATRAM/City of Jackson has implemented the following service standards and policies as described in Chapter IV-4 of the FTA's Title VI Circular 4702.1B for the fixed route services.

## System-Wide Service Standards

### Vehicle Load Standards

Vehicle load is generally expressed as the ration of passengers on board to the number of seats on a vehicle. The average of all loads during the peak operating period should not exceed vehicles' achievable capacities. When maximum load factors are reported as being exceeded, the ridership will be monitored to determine if the load factor is being exceeded on a regular basis. If load factors are exceeded regularly, JATRAN/City of Jackson will evaluate whether frequency on that route should be adjusted within the confines of the expected funding levels. Then determine to either substitute a larger vehicle or minor modification to routes or schedules in order to bring the service within the vehicle load standards.

| <b>Vehicle Load Standards</b> |                        |                          |                       |                            |
|-------------------------------|------------------------|--------------------------|-----------------------|----------------------------|
| <b>Vehicle Type</b>           | <b>Seated Capacity</b> | <b>Standing Capacity</b> | <b>Total Capacity</b> | <b>Maximum Load Factor</b> |
| 40' Low Floor Bus             | 44                     | 12                       | 56                    | 1.3                        |
| 35' Low Floor Bus             | 38                     | 10                       | 48                    | 1.3                        |
| 29' Low Floor Bus             | 32                     | 9                        | 41                    | 1.3                        |

### Vehicle Headway Standards

Vehicle Headways is the amount of scheduled time between buses passing a given point is determined primarily be the time of day, passenger loads and by the service area characteristics such as population density, income and auto ownership. Headways shall be at their maximum when minimum service is provided during off-peak periods. JATRAN/City of Jackson has established the following headways where economically feasible, weekday peak headway shall not exceed 45 minutes express service will include a minimum of four (4) morning and four (4) afternoon trips will be offered in the peak travel direction on routes with higher utilizations. On weekends, 45 minutes or better service headways should begin by 6:45 a.m. and continue until 6:43 p.m.

### On-Time Performance Standards

A bus is determined to be late if it departs it's scheduled "time point" more than five minutes later than the published time. Buses are considered early if they depart from a published "time point" any time prior to the scheduled departure. JATRAN/City of Jackson strives to meet an on-time performance objective of 90% or greater every trip. JATRAN/City of Jackson continuously

monitors on –time performance and system results and published and posted as part of monthly performance reports covering all aspects of operations.

### **Service Availability Standards**

JATRAN/City of Jackson’s goal is to ensure that 90 percent of all residents within the service area are within a ¼ mile walk of bus service. JATRAN/City of Jackson service is particularly strong in communities with significant minority, low-income and limited LEP populations.

### **System-Wide Service Policies**

JATRAN/City of Jackson’s system-wide policies differ from service standards in that they are not necessarily based on meeting a quantitative threshold, but rather qualitative evaluation results. The following represents policies for Vehicle Assignment and Transit Amenities.

#### **Transit Amenities**

Fixed route transit providers must set policy to ensure equitable distribution of transit amenities across the system. Transit amenities may include: seating (benches, seat at stops/stations), bus shelters; printed information (signs, systems maps, schedules); waste receptacles including trash and recycling. There are about 495 bus stops in the City of Jackson. Bus shelters are installed at about 43 bus stops and 51 equipped with free- standing benches. Other passenger amenities included litter receptacles, printed route signage and schedule information. Placement of transit amenities are currently dictated by:

- Ensure that all JATRAN vehicles are low-floor, accessible buses.
- Improve bus stops to ensure they meet ADA requirements of path of travel.
- Install or upgrade bus shelters at stops where ridership and other factors warrant improvements.
- Improve Customer and Community awareness.

#### **Vehicle Assignment**

The vehicle assignments take into account the operating characteristics of 40’, 35’ & 29’ bus lengths, which are matched to the operating characteristics of the route. All buses have the same amenities available to all riders. Every bus is low-floor with a ramp accessible for persons with disabilities. Routes with higher ridership and/or during peak periods are assigned 40’ buses and the remaining vehicles are utilized throughout the service area. The majority of the routes have multiple communities and diverse populations. JATRAN/City of Jackson observes strict standards with respect to adherence to preventive maintenance schedules. The oldest buses in the JATRAN/City of Jackson fleet entered into service in August, 2006.

## **OTHER IMPORTANT DOCUMENTS**

Please see **Appendices H & I.**

## **APPENDICES**

|                    |   |
|--------------------|---|
| APPENDIX A, B, & C | Assurance Clauses                           |
| APPENDIX D         | Title VI Notice to the Public               |
| APPENDIX E         | Title VI Complaint Form                     |
| APPENDIX F         | Public Participation Plan                   |
| APPENDIX G         | Language Assistance Plan (LAP)              |
| APPENDIX H         | FTA Circular 4702.1B Reporting Requirements |
| APPENDIX I         | Nondiscrimination Policy                    |



## APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “contractor”) agrees as follows:

- (1) Compliance with Regulations:** The contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, “DOT”) 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 contract.
- (2) Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin 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 either by competitive bidding or negotiation made by the contractor 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 contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
- (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 City of Jackson or the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so notify to the City of Jackson, or the Federal Transit Administration as appropriate, and shall set forth what efforts it has made to obtain the information.
- (5) Sanctions for Noncompliance:** In the event of the contractor’s noncompliance with the nondiscrimination provisions of this contract, the City of Jackson shall impose such contract sanctions as it or the Federal Transit Administration may determine to be 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 procurements 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 subcontractor procurement as the City of Jackson or the Federal Transit Administration may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the City of Jackson to enter into such litigation to protect the interests of the City of Jackson, and, in addition, the contractor may request the United States to enter into such litigation to protect the interest of the United States.

## APPENDIX B

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

### **(GRANTING CLAUSE)**

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the City of Jackson will accept Title to the lands and maintain the project constructed thereon, in accordance with Title VI of the 1964 Civil Rights Act, The Regulations for the Administration of Federal Transit Administration's programs and the policies and procedures prescribed by the Federal Transit Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, SubTitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the City of Jackson all the right, Title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

### **(HABENDUM CLAUSE)**

TO HAVE AND TO HOLD said lands and interests therein unto the City of Jackson and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the City of Jackson, its successors and assigns.

The City of Jackson, in consideration or the conveyance of said lands and interest in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person 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 with regard to any facility located wholly or in part on over or under such lands hereby conveyed (,) (and)(2) that the City of Jackson shall use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, SubTitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation- Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended (,) and (3) that in the event of breach of any of the above- mentioned

nondiscrimination conditions, the Department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.\*

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

## APPENDIX C

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the City of Jackson pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add 'as a covenant running with the land'] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, SubTitle A., office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation- Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]\*

That in the event of breach of any of the above nondiscrimination covenants, City of Jackson shall have the right to reenter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of City of Jackson and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by City of Jackson pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add “as a covenant running with the land”) that (1) no person on the ground of race, color, or national origin shall be excluded from participation in, denied the benefits of, or he otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of, race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations. Department of Transportation, SubTitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation- Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]\*

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

That in the event of breach of any of the above nondiscrimination covenants, the City of Jackson shall have the right to terminate the [license, lease, permit, etc.] and to reenter and repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

[Include in deeds]\*

That in the event of breach of any of the above nondiscrimination covenants, the City of Jackson shall have the right to reenter said land and facilities there-on, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the City of Jackson and its assigns.

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

## APPENDIX D

### Notifying the Public of Rights Under Title VI

#### The City of Jackson Transit Services

- The City of Jackson operates its programs and services without regard to race, color, or 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 City of Jackson.
- For more information on the City of Jackson's civil rights program, and the procedures to file a complaint, contact 601-960-1327; email [dellis@city.jackson.ms.us](mailto:dellis@city.jackson.ms.us) ; or visit our administrative office at 1000 Metrocenter, Ste 102, Jackson, MS 39209. For more information, visit [www.jacksonms.gov](http://www.jacksonms.gov).
- If information is needed in another language, contact 601-960-1100

## APPENDIX E

|   |             |                   |            |
|---|-------------|-------------------|------------|
| <b>Section I:</b>   |             |                   |            |
| Name:   |             |                   |            |
| Address:  |             |                   |            |
| Telephone (Home):   |             | Telephone (Work): |            |
| Email Address:  |             |                   |            |
| Accessible Format Requirements:   | Large Print |                   | Audio Tape |
|   | TDD         |                   | Other      |
| <b>Section II:</b>  |             |                   |            |
| 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 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         |
| <b>Section III:</b>   |             |                   |            |
| 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   |             |                   |            |
| 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 witness. If more space is needed, please use the back of this form. |             |                   |            |
| _____   |             |                   |            |
| _____   |             |                   |            |
| <b>Section IV:</b>  |             |                   |            |
| 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: \_\_\_\_\_

Federal Court: \_\_\_\_\_                     Local Agency: \_\_\_\_\_

State Court: \_\_\_\_\_

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:

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:

City of Jackson  
Personnel Management  
Attn: Title VI Officer  
1000 Metrocenter, Ste. 102  
Jackson, MS 39209

# APPENDIX F

## PUBLIC PARTICIPATION PLAN

### Introduction

The Public Participation Plan (PPP) for the City of Jackson (COJ), Transit Services was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for the City of Jackson. 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 the City of Jackson’s services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The City of Jackson 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 the COJ and its operations. The goals for this PPP include:

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

JATTRAN 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. The public will also be able to call the JATTRAN's office at 601-948-3840 OR 601-948-7140 during its hours of operation. Feedback collected over the phone will be recorded and passed on to JATTRAN 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, JATTRAN 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

Public hearings are not required.

# APPENDIX G

## LANGUAGE ASSISTANCE PLAN (LAP)

The intent of this Limited English Proficiency (LEP) Plan is to ensure access to the planning process and information published by the City of Jackson’s, Transit Services Division, whether it is determined that a substantial number of residents do not speak or read English proficiently. This LEP Plan will serve as a guide for staff in identifying reasonable procedures in providing language assistance during the transportation planning process. It will detail procedures on how to identify persons who may need language assistance, the way in which assistance may be provided, the training of staff and how to notify LEP persons that assistance is available.

### WHO IS CONSIDERED AN LEP?

Individuals with a limited ability to read, write, speak or understand English are limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing public services and benefits- including public transit services.

### THE “FOUR FACTOR ANALYSIS”

The DOT guidance outlines “four factors” recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP services. Through conducting the “Four Factor Analysis,” Transit Services is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to request for LEP assistance from constituents. The four factors are as follows:

1. The number of proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people’s lives;
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

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

The first step is to collect demographic data on the number of LEP persons in the Hinds County Metro Area who are eligible to be served, likely to be served, or likely to be encountered by public transportation (JATRAN) through participation in the transportation planning process. It should be noted that for planning purposes, people that speak English “less than very well” are

included in the analysis. Further, only the top language group other than English will be examined to decide who utilizes transportation services as well as staff insight.

**Table 1** is derived from the U.S. Census Bureau, American Fact Finder. It covers “language spoken at home for the population 5 years and over” and includes population 5 years and over for 2010-2012 American Community Survey 3-Year Estimates.

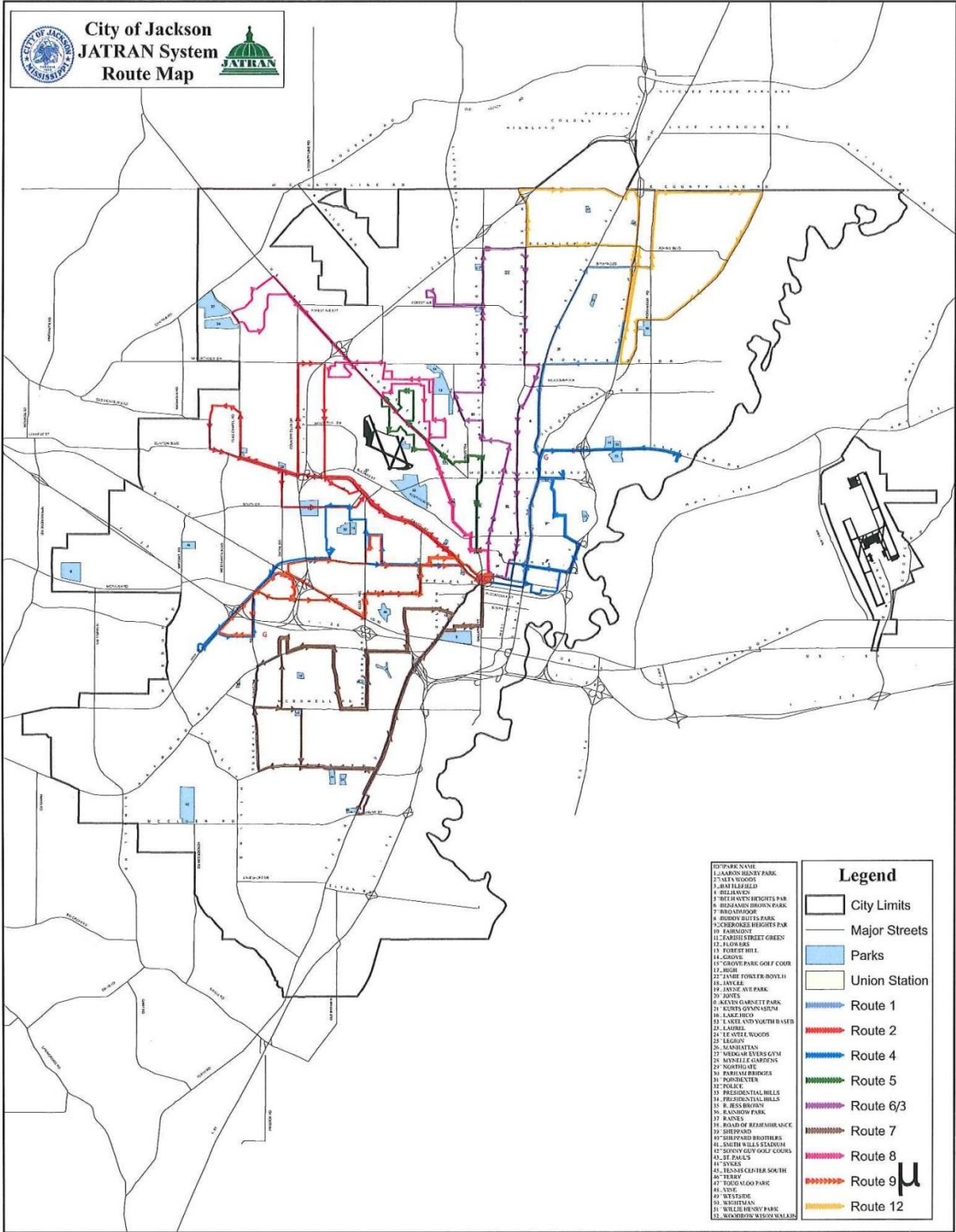
|  | <b>Hinds County, Mississippi</b> |                        |
|--|----------------------------------|------------------------|
|  | <b>Estimate</b>                  | <b>Margin of Error</b> |
| Total:                                   | 229,779                          | +/-110                 |
| Speak only English                       | 221,903                          | +/-1,158               |
| Spanish or Spanish Creole                | 4,224                            | +/-841                 |
| French (including Patois, Creole, Cajun) | 820                              | +/-349                 |
| German or other West Germanic languages  | 43                               | +/-39                  |
| Slavic languages                         | 120                              | +/-110                 |
| Other Indo-European languages            | 772                              | +/-342                 |
| Korean                                   | 38                               | +/-38                  |
| Chinese                                  | 475                              | +/-240                 |
| Vietnamese                               | 72                               | +/-93                  |
| Tagalog                                  | 169                              | +/-169                 |
| Other Asian and Pacific Island languages | 489                              | +/-375                 |
| Other and unspecified languages          | 654                              | +/-354                 |

**Safe Harbor Provisions**

Publications will be provided in Spanish due to LEP findings in factor (one) 1 of the four factor analysis to better serve the LEP population.

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with great certainty. A “safe harbor” means that as long as a recipient (The City of Jackson) has created a plan for the provision of written translation under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

Evidence of compliance with the recipient’s written translation obligation under the “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation can also be provided orally.



| Legend |               |
|--------|---------------|
|        | City Limits   |
|        | Major Streets |
|        | Parks         |
|        | Union Station |
|        | Route 1       |
|        | Route 2       |
|        | Route 4       |
|        | Route 5       |
|        | Route 6/3     |
|        | Route 7       |
|        | Route 8       |
|        | Route 9       |
|        | Route 12      |

- ED/PARK NAME**  
 1. LAMON HENRY PARK  
 2. MET WOODS  
 3. BIRCHFIELD  
 4. BELLAIR  
 5. BELLAIR HEIGHTS PARK  
 6. BRIDGESIDE PARK  
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**Factor 2: The frequency with which LEP persons come into contact with the program.**

The four-factor analysis identified Spanish as the most significant language spoken by the LEP population in the Hinds County Metro Area. The LEP population will likely continue to increase and, as a result, the probability of increased future contact with JATRAN. To date, JATRAN has not received any formal requests by LEP individuals for language translation of any document or any requests for an interpreter at any public activity.

If need arises, LEP services can be provided in two ways: verbal interpretation and written translation of vital documents.

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

For many to fully participate in society, access to public transportation is critical. Riders use services for their multiple travel needs within the community, including trips to work, school, job interviews, shopping, medical visits and much more.

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

Transit Services annual operating budget generally has funds for advertising and outreach. As funding allows, Transit Services intend to utilize funds as needed. There are \$683 proposed dollars available for advertising and \$4,000 proposed for supplies and materials. Transit Services will continually evaluate its programs, services and activities to ensure that persons who may be LEP are always provided with meaningful access. Verbal and written translation will be provided, if requested within a reasonable time frame and if within available resources.

**Element 1: Identifying LEP individuals who need language assistance**

- 1. Census Data:** As discussed above, Census 2010 data indicates that Spanish-speaking LEP persons are the primary group requiring language assistance in Transit Services area. Transit Services will continue monitoring and using Census data releases to identify and locate significant and emerging LEP populations.
- 2. Documenting Staff Encounters with LEP Persons:** Staff members will document encounters with individuals who are LEP.

**Element 2: Providing Language Assistance Measures**

- 1. Tools for LEP aid:** Provide LEP persons with needed assistance such as (maps, bus schedules and notices in their language. If needed, electronic devices or an interpreter are provided to assist LEP persons.



**2. Assisting LEP Persons on-board Buses:** If an LEP passenger needs assistance while on-board a bus, recommended approaches to understand and appropriately respond to the passenger's needs and situations are as follows:

- The bus operator may inquire if another passenger can serve as a translator.
- More difficult or emergency situations may necessitate contacting JATRAN Supervisors or Dispatch for additional help and phone access to language line interpreters.

### **Element 3: Training Staff and Outreach Efforts**

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public will be trained on the LEP plan for providing language assistance.

Recommended training efforts include the following:

- Executive staff should be familiarized with the LEP plan to reinforce its importance and ensure its implementation.
- Any new staff should receive information on how to accommodate LEP individuals.
- Dispatch and bus operators will receive training on how to properly assist LEP individuals.
- Identify agencies in the region that may serve LEP populations.
- Provide information on services to those agencies, as appropriate.
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings as appropriate.

### **Element 4: Providing Notice to LEP Persons of Availability of Language Assistance**

JATRAN'S current and planned measures to inform LEP persons of the availability of language assistance avenues includes, but is not limited, to the following:

1. Proper signage on buses as well as bus stop areas;
2. Utilize local newspapers;
3. Direct engagement with LEP populations and community organizations through working with various community organizations, JATRAN will seek to identify and engage LEP populations in the community and inform them of available public transportation services and related language assistance mediums.

## **Element 5: Monitoring and Updating the LEP Plan**

JATRAN will routinely review and update its LEP Plan as necessary. JATRAN will pay particular attention to demographic changes in the area, as well as, any LEP related complaints received.

### **DISSEMINATION OF JATRAN'S LEP PLAN**

The LEP Plan can be obtained from JATRAN'S office or the JATRAN's website ([www.jatran.com](http://www.jatran.com)). Alternatively, any person or agency may request a copy of the plan via telephone, email, fax, mail or in person and shall be provided a copy of the plan at no cost. Request for copies of the LEP Plan and questions or comments about the plan should be directed to the following:

**JATRAN  
1025 Terry Rd,  
Jackson, MS 39204**

**Phone: 601-948-3840  
601-948-7140**

# APPENDIX H

## 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 standards
  - 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.

(The Urbanized Area (UZA) is not applicable to the City of Jackson because the population is 172,638 and Jatran has 45 revenue vehicles [25 fixed routes and 20 paratransit] in its entire fleet.)

## **APPENDIX I**

### **Nondiscrimination Policy**

We are committed to operating our programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint by contacting the Executive Director at the telephone number listed on the outside of this vehicle.

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A complaint may file a complaint directly with the Federal Transit Administration at the Office of Civil Rights, Attention; Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590