



The Franklin Transit Authority

Title VI Plan

2026 Update

This plan was developed by The TMA Group to guide Franklin Transit in its administration and management of Title VI related activities. It is a working plan and is not codified within the City of Franklin Charter, or its ordinances.

As with any other City of Franklin activity, the public is invited to review and submit comments and suggestions at any time regarding the Title VI Program.

Comments and/or suggestions regarding this Title VI Program may be submitted to:

Franklin Transit Authority
Attn: Title VI Coordinator
708 Columbia Avenue
Franklin, TN 37064
(615) 790-4005 • www.franklintransit.org

Updated: July 2026

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Section I: Policy Statement

Franklin Transit Authority (Franklin Transit) assures that no person on the grounds of race, color, or national origin as provided by Title VI of the Civil Rights Act of 1964 be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal funding.

In the event that Franklin Transit distributes federal funds to another governmental entity or contractor, Franklin Transit will include Title VI language in all written agreements and will monitor compliance.

Franklin Transit assures that:

- No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- Franklin Transit will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulations, 49 CFR Part 21.9.
- Franklin Transit will make it known to the public that those persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation service and transit-related benefits may file a complaint with the Federal Transit Administration (FTA) and/or the U.S. Department of Transportation (USDOT).

The President and CEO for Franklin Transit shall be the Title VI Director and will have the ultimate authority and responsibility for the agency's adherence to the Title VI policy.

The Title VI Coordinator is responsible for managing and implementing all aspects of the Title VI Program.

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Transportation. (49 CFR 21.1)

Federal Circular FTA 4702.1B details the requirements necessary for compliance and administration of a Title VI Program.

Debbie Henry

Debbie Henry, President and CEO

Date: 7/2026

Mimi Lee

MiMi Lee, Title VI Coordinator

Date: 7/2026

Section II: Overview of Title VI Compliance

A. General Requirements and Guidelines

Requirements and guidelines for general reporting are contained in FTA Circular 4702.1B – Chapter III.

Requirements include:

- Title VI plan must be received and approved by FTA prior to the approval of any grant application or, at minimum, it must be updated once every three (3) years.
- Signed Department of Transportation Title VI assurances.
- List of any active lawsuits and complaints which allege discrimination.
- Description of all pending and current federal financial assistance.
- Summary of all civil rights compliance review activities conducted by FTA.
- Special requirements for federally funded construction projects.
- Information of changes in service features which affect minority communities and transit users.
- Description of methods used to inform minority communities of service changes.

B. Public Information Requirement

Franklin Transit is required to ensure that the public and any interested party is informed of our Title VI obligations. Franklin Transit must display posters and inform the public in languages other than English if necessary.

C. Complaints of Discrimination Procedure

Requirements and guidelines for developing and implementing a complaints procedure are contained in FTA Circular 4702.1B – Chapter III (7). The procedure will:

- Inform the public as to Franklin Transit's Title VI obligations.
- Inform the public how to file a complaint of discrimination.
- Implement and maintain a method for receiving, administering, investigating, and resolving complaints.

D. Record Keeping Requirements

Records must be maintained in all areas of the Title VI program. Documents must be available for compliance review audits.

E. Compliance Review / Audits

After a grant has been awarded, FTA may conduct reviews as part of its ongoing monitoring responsibilities, pursuant to its authority under 49 CFR 21.9. These reviews exist separate from and may be in addition to the Triennial Review conducted by the Tennessee Department of Transportation (TDOT) and will be conducted either as a desk audit or an on-site visit. Such reviews are at the discretion of FTA, and their scope is defined on a case-by-case basis. Franklin Transit's most recent TDOT Civil Rights Division Title VI Compliance Assessment was completed and submitted on July 2026.

Section III: General Reporting Requirements

At least once every three (3) years, Franklin Transit must submit a Title VI Program report to FTA and, annually, must complete the TDOT Civil Rights Division Title VI Compliance Assessment. The report must include:

- A copy of the agency's notice to the public that complies with Title VI and instructions to the public on how to file a discrimination complaint.
- A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin. A copy of the agency's procedures for investigating and tracking Title VI complaints must be included in the report.
- A summary of public outreach and involvement undertaken since the last report submission and a description of steps taken to ensure that minority and low-income people have meaningful access to transit programs and activities.
- A copy of the agency's plan for providing language assistance to persons with limited English proficiency (LEP), based on USDOT guidance.
- A table depicting the racial/ethnic composition of non-elected boards, councils, or committees and a description of efforts made to encourage minority participation.
- A narrative describing the agency's plan for assisting subrecipients with general reporting requirements and monitoring for compliance with USDOT Title VI regulations.

2026 Federal Funding Summary

Franklin Transit reported the following federal funding information to TDOT's Civil Rights Division as part of the 2026 Title VI Compliance Assessment:

- One award has been made in FY2026: TN-2026-017. The Franklin Transit project includes Approved Line Items (ALIs) for operating assistance, preventive maintenance, facility leasing, capital equipment, transit planning, safety, and security.
- Subrecipient Williamson County received Section 5307 federal funds to be utilized for operating assistance, mobility management, leasing, and security for its regional commuter vanpool program.
- One application is pending for FTA Section 5307 funds in the amount of \$1,158,211, with Williamson County as a subrecipient. This application includes funding for bus shelter and sidewalk improvements, preventive maintenance, and rolling stock.

2025–2026 Title VI Complaint Summary

No Title VI complaints or other civil rights lawsuits alleging discrimination on the basis of race, color, and/or national origin were filed with Franklin Transit during the 2025–2026 reporting period. See Attachment C for the current complaint log.

Section IV: Notice to Beneficiaries

Franklin Transit will distribute Title VI Program information to transit employees, contractors, subcontractors, and subrecipients as well as the public. Public dissemination will include the posting of the protections against discrimination afforded to them by Title VI. Notices will be posted throughout the Franklin Transit facilities, revenue vehicles, route map/schedule, and on the agency website, www.franklintransit.org. Title VI language will be included in all contracts.

- Triennial reports sent to FTA, Franklin Transit's Title VI Policy, and any other related information will be available to the public upon request.
- Signage shall be displayed which includes at least the following:
 - Franklin Transit operates programs and activities that are subject to the non-discrimination requirements under Title VI.
 - A summary of the requirements of Title VI.
 - An explanation that Title VI information is available from Franklin Transit.
 - A brief explanation regarding procedures for filing a complaint.

See Attachment D: Title VI Non-Discrimination Statement / Notice to the Public.

- More detailed information regarding Franklin Transit's Title VI Program and complaint procedure is available to the public upon request by contacting the Title VI Coordinator at (615) 790-4005, by email at mlee@tmagroup.org, or in person at the Franklin Transit Center, 708 Columbia Avenue, Franklin, TN 37064.
- All documents are available for translation, upon request, at no additional charge. The Franklin Transit website offers built-in translation into Spanish, Arabic, Chinese (Simplified), Dutch, French, German, Italian, Portuguese, and Russian.

Section V: Complaints of Discrimination Procedure

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Consistent with current agency practice published at franklintransit.org/civil-rights, the Title VI Discrimination Complaint Form (available in English and Spanish) and the Title VI Complaints of Discrimination Timeline and Procedures document are posted on the Franklin Transit website for public download, and complaints may also be directed to info@tmagroup.org.

Complaint Procedure

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI may file a complaint with Franklin Transit, 708 Columbia Avenue, Franklin, TN 37064, or TDOT, 312 Rosa L Parks, William R Snodgrass Tennessee Tower, 15th Floor, Nashville, TN 37243, or the Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590. A formal complaint must be filed within one hundred eighty (180) days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and, if necessary, assist the person in converting verbal complaints into writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the circumstances and facts surrounding the alleged discrimination.
4. Franklin Transit will provide the complainant or his/her representative and any respondent with a written acknowledgement, within five (5) working days of receipt, that Franklin Transit has received the complaint.
5. A copy of the complaint will be forwarded to Franklin Transit's legal counsel for review.
6. The President and CEO will assign an Investigator to the complaint.
7. The investigator will determine if the complaint has investigative merit by confirming that: it was received within 180 days of the alleged occurrence; it does not appear to be frivolous or trivial; it involves Franklin Transit or a subrecipient; and/or it involves a contractor performing work under a Franklin Transit federally funded contract.
8. The complainant will be notified of the status of the complaint within ten (10) days of receipt, by registered mail, including whether the complaint will be investigated or the reasons why it lacks investigative merit, and whether additional information is needed to assist the Investigator.
9. The complainant must submit requested information within sixty (60) working days of the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The internal investigator must, within fifteen (15) working days, supply the President and CEO with a status report of the investigation and/or resolution of the complaint.

11. Within sixty (60) days of receipt of the complaint, the Investigator will prepare a written report for the President and CEO that includes a description of the incident and persons/entities involved; a statement of the issues raised and the respondent's reply; a description of the investigation, including a list of people contacted and a summary of interviews conducted; and a statement of the Investigator's findings and recommendations for disposition.
12. The investigative report and findings will be sent to legal counsel for review.
13. The President and CEO shall, based on the information before him/her and in consultation with legal counsel, decide on the disposition of the complaint. Determination shall be made within ten (10) days of the President and CEO's receipt of the Investigator's report.
14. Notice of the President and CEO's determination will be mailed to all parties involved in the complaint, including information regarding appeal rights and instructions for initiating an appeal. If the complainant is dissatisfied with the determination, the complaint may be submitted to TDOT, 312 Rosa L Parks, William R Snodgrass Tennessee Tower, 15th Floor, Nashville, TN 37243, or the Federal Transit Administration for investigation (Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590, or visit www.fta.dot.gov).
15. A copy of the complaint and Franklin Transit's investigation report/letter of finding will be issued to FTA within ninety (90) days of the receipt of the complaint.
16. A summary of the complaint and its resolution must be included in the annual report to FTA.

See Attachment C: Title VI Complaint Forms and Complaint Log.

Section VI: Record Keeping Requirements

The Title VI Coordinator will ensure that all records relating to Franklin Transit's compliance with Title VI are maintained for a minimum of seven (7) years. Records may include, but are not limited to, compliance assessment surveys, documentation regarding complaints, and annual reports.

These records must be available for compliance review audits.

Copies of the following material will be kept available by the Title VI Coordinator for dissemination to the public upon request:

- Franklin Transit's Title VI Policy
- Title VI Discrimination Complaint Form
- Complaint Log with a summary of their disposition

Section VII: Public Involvement Plan (PIP) and System-Wide Service Standards and Policies

VII.A – Public Involvement Plan (PIP)

Purpose

Franklin Transit's Public Involvement Plan (PIP) establishes the framework by which Franklin Transit engages the public — with particular emphasis on minority, low-income, and Limited English Proficient (LEP) populations — in transit-related decision-making, including service and fare changes, route planning, and the development of Title VI-related policies. The PIP is designed to ensure that all persons, regardless of race, color, national origin, income, or English proficiency, have equal access and the opportunity for meaningful participation.

Goals and Objectives

- Provide meaningful opportunities for public input at convenient times and locations throughout the community.
- Proactively engage minority, low-income, LEP, elderly, and disabled populations who are traditionally underserved or underrepresented in the public process.
- Provide early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.
- Ensure that Franklin Transit's public participation process is accessible, transparent, and responsive to community feedback.

Public Participation Strategies

Franklin Transit's decision-making process will include the following strategies:

- Scheduling public meetings at varying times, dates, and locations that are convenient and accessible for LEP and minority communities, including evening and weekend options where practicable.
- Establishing relationships with community and faith-based organizations to engage in outreach strategies that reach LEP and minority communities.
- Disseminating public meeting information through local government access television, radio, local and cultural newspapers (including the Williamson Herald, La Campana, Nashville Scene, and Williamson Scene), social media, and the Franklin Transit website.
- Providing translation and interpretation services, including the Language Line Translator tool featured on the Franklin Transit website, and multilingual website navigation (Spanish, Arabic, Chinese (Simplified), Dutch, French, German, Italian, Portuguese, and Russian) upon request and at no cost to the public.
- Making meeting facilities and materials accessible to persons with disabilities in accordance with the Americans with Disabilities Act (ADA).
- Providing multiple channels for public comment, including in-person testimony, written comment, phone, email, and the online “Suggest a Stop” / rider-suggestion form at franklintransit.org.
- Documenting and retaining records of public meetings, comments received (oral or written), and Franklin Transit's response(s) and/or determination(s) for a period of three (3) years.

Public Hearing Requirements – Fare Increases and Major Service Changes

Franklin Transit Authority (“FTA”) will hold a public hearing prior to:

- Any fare increase; and/or
- A major service change, defined as: a service reduction which directly affects over ten percent (10%) or more of the number of transit hours operated within the system monthly; the elimination of a transit route; or the establishment of a new transit route.

A notice, in both English and Spanish, announcing FTA's intent to hold the public hearing regarding a proposed fare increase and/or major service change will be published in the Williamson Herald (daily newspaper in the Franklin service area) at least fifteen (15) days prior to the hearing. The notice will also be posted on the FTA website, FTA social media sites, the City of Franklin website, on FTA revenue vehicles, at the FTA Transit Center, and at Franklin City Hall at least fifteen (15) days prior to the hearing. The notice will state:

- The proposed service/fare change, including the time/location of the hearing.
- That written comments will be accepted until a specified date, for those unable to attend the hearing who wish to make a comment.
- That special services such as interpreters or translators will be made available to those requiring such a service, upon five (5) day written request to FTA, with FTA contact information provided.

Comments received during the hearing, or which are submitted to FTA by commenters in written form, will be fully evaluated by the FTA Board, TMA Director, and transit management staff. Responses will be provided to the FTA Board and to commenter questions. Alterations to FTA's proposed fare increase/major service change, based on FTA's consideration of comments received, will be made if determined to be feasible and/or appropriate. FTA will maintain written records for a period of three (3) years of: public hearing attendees, any comments received (oral or written), and FTA's response(s) and/or determination(s).

Exceptions to this public hearing policy include: (1) standard seasonal variations; (2) emergency situations, where FTA will immediately implement a service change, notify the FTA Board within five working days of implementation, and hold a public hearing on the change within sixty (60) days of implementation (unless the change is to be for 90 days or less); and (3) experimental, temporary additions or changes of less than a one-year duration.

All service changes and/or fare changes require the directive and action of the FTA Board. Proposed changes must be presented to the FTA Board at least sixty (60) days in advance of the date on which the change is proposed to take effect. The FTA Board shall either approve or disapprove the request by Board action within thirty (30) days after it receives the request. (Service Contract Section 3.2A)

VII.B – Disparate Impact and Disproportionate Burden Assessment Policy

FTA Disparate Impact Threshold: FTA will consider a disparate impact to exist if there is at least a twenty-five percent (25%) difference, plus or minus, between minority ridership and system ridership, or between the minority population of the affected service area and the entire service area population, which adversely impacts the minority population.

In addition to conducting the public participation process described above during the planning period for a fare change or a major service change, FTA will also take steps to ensure that the proposed fare/service

change does not result in disparate impacts on the basis of race, color, or national origin, or a disproportionate burden on low-income populations.

1. Fare Change

Any FTA fare increase will be made so that it results in the most equivalent percentage increases across all FTA fare types (one-way base fare, one-way half-fare senior, one-way half-fare disabled, one-way half-fare Medicare, and FTA Fast Pass).

During the fare increase planning period, FTA will conduct a comparison between the proportion of persons in the protected class (minority and/or low-income population) who are adversely affected and the percentage of persons not in the protected class who are adversely affected. This comparison will be made by analyzing the data results of a current on-board ridership survey, which will be charted to compare fare payment patterns for minority riders and low-income riders versus non-minority and higher-income riders (see Chart 1).

If a disparate impact or disproportionate burden is found based on the FTA threshold, FTA will either: modify the fare increase proposal to remove or alleviate the impact; or clearly demonstrate that FTA has a legitimate justification for the proposed fare increase and analyze alternatives to ensure that the proposed fare increase is the least discriminatory practicable alternative, including timing and mitigation of the proposed fare increase.

- Mitigation efforts: FTA will make available free (or discounted) one-way or monthly fixed route passes to non-profit, not-for-profit, and governmental agencies that assist low-income persons and families, under an FTA Community Pass Program. Qualifying agencies may provide passes received under this program to agency clients at no more than the free or discounted amount the agency was charged by FTA. FTA will maintain records of discounted and/or free passes for three years after such passes are provided.

2. Major Service Change – Route Revision or Elimination

A proposed route elimination or route change which meets the above-defined threshold will be assessed by the following methods:

- A comparison of current ridership survey data: minority ridership of the affected route(s) will be compared with the ridership of the entire system (see Chart 2).
- A comparison of current population data: U.S. Census block-level minority population along the route(s) in question will be compared with the average population in the service area of the route(s) in question, using the most current available U.S. Census data (see Chart 3).

If the proposed major service change will result in a disparate impact or disproportionate burden, FTA will review alternatives to determine if the change can be minimized, avoided, or mitigated. If FTA determines that the change cannot be minimized or avoided, FTA will analyze alternatives to determine whether the proposed service change is the least discriminatory practicable alternative and document legitimate justification for the proposed service change.

3. Addition of New Route(s)

A proposed new route will be assessed by creating a map of the existing FTA routes, as well as the proposed new route, overlaid on a map of the entire FTA service area that includes U.S. Census minority and low-

income information. New routes that extend connectivity through transfer operations will be given special consideration if they promote essential services, including but not limited to employment centers, medical services, and social services. Additional favorable consideration will be given to new routes which connect system routes and serve continued access to essential services for the population, not limited to but including employment centers, medical, and social services.

VII.C – System-Wide Service Standards and Policies

Title VI requires that transit providers develop quantitative standards to ensure that the level and quality of transit service is provided in a nondiscriminatory manner. Franklin Transit's system-wide service standards and policies are set out below.

Vehicle Load

The number of passengers, or load, carried per hour, measures the efficiency of service. Franklin Transit's system-wide efficiency goal, or Load Standard, for buses is 6 passengers or more per trip. The Load Factor, measured as a percent of a fully seated load, varies with service type:

Service Type	Peak	Off-Peak
Major Hub Radial	120%	100%
Circular/Connector	120%	120%
Demand Response	100%	100%

To ensure service quality, any service consistently operating at more than 120% of its seating capacity (load factor) will be evaluated to reduce overcrowding.

Vehicle Headway

Routes operating in urban areas have 15- to 30-minute headways during peak periods, and one hour during non-peak periods. Franklin Transit currently operates on 30-minute headways throughout the day on its fixed routes. Planning efforts and operational changes are underway to move toward 15- to 30-minute headways system-wide.

On-Time Performance

On-time performance for Franklin Transit's fixed-route service is measured against the published schedule and actual bus arrival times at designated time points throughout the system. A bus is considered “on time” if not more than 5 minutes late at each scheduled time point. Route Match Software — a transit dispatch and automatic vehicle location (AVL) system using GPS technology — is used to determine actual arrival times. Franklin Transit is fully operational with Route Match for on-time performance tracking of its Demand Response (TODD) service, with plans to extend on-time tracking to fixed-route service. Bus on-time performance can be impacted by traffic congestion, detours, weather, higher-than-anticipated boardings, and boardings of passengers with accessibility needs. The system-wide on-time performance goal for Franklin Transit is 80%.

Service Availability

Franklin Transit has a service standard goal of locating fixed routes within ½ mile of high-density minority and low-income census tracts and connecting service corridors, giving customers access to employment, medical, retail, and social services. Franklin Transit's bus stop standard distance within densely populated census tracts and connecting employment, medical, retail, and social service areas is ¼ mile. Service standards for bus stops in other areas will be at 1 mile. Exceptions to the 1-mile standard for low-density areas will be managed on a case-by-case basis, where Franklin Transit receives a written request from the general public, public or private development, or the implementation of Express service.

Transit Amenities

Transit amenities refer to fixed items of comfort and convenience available to the general riding public, such as bus stop benches, shelters, lighting, and bike racks. Title VI requires that such amenities be distributed equitably among minority, non-minority, and low-income households.

Bus stop amenities are provided by a variety of sources including local governments, private developers, and citizens groups, as well as funds flowing to Franklin Transit; at times these facilities are placed without direction or control of the transit agency. Franklin Transit inventories existing amenities within its control and determines where new or replacement facilities should be located based on bus stop boardings, waiting times, other nearby shelters and amenities, and minority/non-minority tract distribution. It is the policy of Franklin Transit that at least 50% of shelters and amenities be located in Census Tracts on routes associated with urbanized areas, including high-density population and high-density service areas. All FTA transit amenities must meet ADA standards.

Vehicle Assignment

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits, including vehicle age and on-board amenities. Buses currently differ primarily by seat capacity and age; amenities such as air conditioning, heat, bike racks, wheelchair accessibility, and upholstery are standard across the fleet. To distribute the age of vehicles evenly, each bus line is assigned a proportional number of buses by age, which are then distributed throughout the day as maintenance and repair needs permit.

Chart 1 – FTA Fare Increase Disparate Impact Comparison (Ridership)

Fare Type	Existing	Proposed	Low-Income %	Minority %	Overall %
Base (cash)	\$1.00				
Senior	\$0.50				
Disabled	\$0.50				
Medicare	\$0.50				
Fast Pass (31-Ride)	\$25.00				
TODD (Zone 3)	\$4.00				

Note: This chart will be populated with current on-board ridership survey data at the time a fare change or major service change is proposed, consistent with the Disparate Impact and Disproportionate Burden Assessment Policy above.

Chart 2 – Route Elimination or Major Change Disparate Impact Comparison (Ridership)

Type of Service Change	Total Boardings (Affected Route)	% Minority (Route)	% Low- Income (Route)	% Minority (System)	% Low- Income (System)
Service Span / Route Change					

Section VIII: Limited English Proficiency (LEP) Plan

This Limited English Proficiency (LEP) Plan has been prepared to address Franklin Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

Franklin Transit is the provider of public transportation in the City of Franklin, TN. Franklin Transit has updated this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Franklin Transit. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance and the ways in which assistance may be provided.

To prepare this update, Franklin Transit undertook the U.S. Department of Transportation (USDOT) Four Factor Analysis, using the most recently available U.S. Census Bureau American Community Survey (ACS) 2020–2024 5-Year Estimates for the City of Franklin, TN.

Four Factor Analysis

Factor 1: The Number and Proportion of LEP Persons Eligible to Be Served or Likely to Be Encountered in the Service Area

The Franklin Transit Authority provides public transportation services within the City of Franklin, TN. Based on the U.S. Census Bureau's 2020–2024 ACS 5-Year Estimates, the City of Franklin's population is approximately 89,142 (2024 estimate; 90,226 per the 2025 estimate). Approximately 14.1% of Franklin residents age 5 and older speak a language other than English at home, and approximately 11.9% of the population is foreign-born — both figures having increased modestly since the prior (2021 5-Year Estimate) LEP Plan, which reported approximately 1,413 Spanish speakers in the City who spoke English less than “very well” (37.7% of all Spanish speakers at that time).

Spanish remains the predominant non-English language spoken in the Franklin Transit service area, with an estimated 5–6% of Franklin households speaking Spanish at home. Consistent with the 2023 analysis, Spanish continues to be the language for which Franklin Transit most frequently provides language assistance. Franklin Transit will continue to monitor updated ACS Table S1601 (Language Spoken at Home) data as it becomes available and will update the LEP population estimate accordingly with each triennial or interim plan update.

Factor 2: Frequency of Contact by LEP Persons with Franklin Transit Services

Franklin Transit staff review the frequency with which administrative staff, dispatchers, and drivers have, or could have, contact with LEP persons. Franklin Transit has contracted with Language Line Solutions since 2022 for interpreter and translation services, and the Franklin Transit website (franklintransit.org) now also features an embedded Language Line Translator video tool and multilingual site navigation (Spanish, Arabic, Chinese (Simplified), Dutch, French, German, Italian, Portuguese, and Russian).

Factor 3: Importance of the Program, Activities, or Services Provided by Franklin Transit

Franklin Transit provides a deviated fixed-route service and a paratransit (TODD On Demand) service. Paratransit provides transportation for critical needs that transcend all rider types. These rides provide critical access to medical appointments, pharmacies, health and human service organizations, employment, and educational institutions. Additionally, paratransit services provide transportation to destinations that improve quality of life, including access to friends, family, and entertainment. Because Franklin Transit service is often essential and time-sensitive (e.g., medical appointments, employment), the importance of ensuring meaningful access for LEP individuals is high.

Factor 4: Resources Available to the Recipient and Costs

Franklin Transit has contracted with Language Line Solutions for interpreter and translation services since 2022. All language assistance services are provided to the public at no cost. Franklin Transit's website also provides free, built-in machine translation into nine languages, and printed Title VI materials — including the Title VI Notice to the Public and the Title VI Discrimination Complaint Form — are available in English and Spanish. Given Franklin Transit's current budget and staffing resources, the agency has determined that continued use of a contracted telephone interpreter line, website translation tools, and translated vital documents represents a reasonable and cost-effective approach to providing meaningful access for LEP individuals.

Language Assistance Plan

Based on the Four Factor Analysis above, Franklin Transit has developed the following Language Assistance Plan.

Identifying a Person Who Needs Language Assistance

- Examine records to determine whether requests for language assistance have been received in the past, either at transit-sponsored meetings or through calls received at the transit office. This helps determine the need for language assistance at future transit-related events.
- Have staff greet and engage participants in informal conversation as they arrive at transit-sponsored activities and events.
- Maintain language identification (“I Speak”) materials at transit meetings.
- Maintain language identification materials at transit center to assist transit operators in identifying LEP passengers.

Language Assistance Measures

There are several ways in which Franklin Transit staff respond to LEP persons, whether in person, by telephone, or in writing:

- Post the Title VI Policy and LEP Plan on the transit website, www.franklintransit.org.
- Provide free, built-in website translation into Spanish, Arabic, Chinese (Simplified), Dutch, French, German, Italian, Portuguese, and Russian.
- Provide access to the Language Line Translator tool for real-time interpretation.
- Provide the Title VI Notice to the Public and Title VI Discrimination Complaint Form in English and Spanish.
- Communicate with transit operators, administrative staff, dispatchers, and supervisors regarding their experience and contact with LEP persons during the previous year.

Staff Training

The following training will be provided to transit staff:

- Information on Title VI procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of language identification materials.

Providing Notice to LEP Persons / Outreach Techniques

When transit staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternate language based on the known LEP population. Flyers will be placed at the transit station and on buses. Announcements will be posted on the Franklin Transit website, social media, and in local newspapers.

Monitoring and Updating the LEP Plan

Franklin Transit will update the LEP Plan as required by federal regulations. At minimum, the plan will be reviewed and updated when higher concentrations of LEP persons are present in the service area, and at each triennial Title VI Plan update. Updates will include:

- Determining the current LEP population in the service area using the most recent ACS data.
- Evaluating how the needs of LEP persons have been addressed.
- Determining whether the need for translation services has changed.
- Determining whether local language assistance programs have been effective and sufficient to meet the needs identified.
- Determining whether Franklin Transit has complied with the goals of this LEP Plan.
- Determining whether complaints have been received concerning Franklin Transit's failure to meet the needs of LEP persons.

Section IX: Education and Training

Transit Staff

Training will be conducted within the ninety (90) day initial review period for newly hired employees and on an annual basis for existing staff. Consistent with the 2026 TDOT Civil Rights Division Title VI Compliance Assessment, Franklin Transit's Title VI Coordinator most recently completed TDOT Title VI training on July 1, 2026. Training is provided through oral discussion, written materials, and video, and occurs at new hire orientation, quarterly safety meetings, annual staff in-service, and on a triennial basis for the Title VI Coordinator. Additional general staff meetings may be scheduled as needed when updates to Title VI requirements are issued. Training will include:

- Requirements of Title VI.
- Procedures for engaging LEP customers.
- Summary of complaint procedures.

Contractors

Training is available to contractors upon request. Training will include:

- Standard Title VI notices and information in bid packages and contracts.
- Contractor's obligations under Title VI and its application to the work necessary under the contract.
- Contractor's obligations when subcontracting work.
- Processes for identifying Title VI issues and resolution of complaints.

Section X: Program Administration

I. Title VI Director Duties

- The President and CEO shall also be the Title VI Director.
- The Title VI Director shall have the final authority and responsibility for compliance with Title VI provisions.

II. Title VI Coordinator Duties

- Gather information necessary for general reporting and report to FTA and TDOT.
- Process, record, and distribute Title VI complaints received by Franklin Transit.
- Monitor and ensure that public information is available for Franklin Transit's Title VI Program.
- Develop Title VI information for dissemination to the public and, where appropriate, in languages other than English.
- Conduct training sessions for all transit employees regarding Title VI policies and procedures.

As of this 2026 update, MiMi Lee serves as Franklin Transit's Title VI Coordinator. Mike Johnston, ADA Coordinator for Franklin Transit, The TMA Group, and VanStar, serves as the primary point of contact for ADA-related complaints and reasonable modification requests, coordinating closely with the Title VI Coordinator on matters that intersect both Title VI and ADA obligations.

Section XI: Subrecipient Assistance and Monitoring

As outlined under Title 49 CFR, Section 21.9(b) and FTA Circular 4702.1B, Chapter III, Parts 11 and 12, Franklin Transit will aid and monitor its subrecipients to ensure they are complying with Title VI regulations.

A subrecipient may opt to adopt Franklin Transit's Title VI program, which includes notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan.

See Attachment E: Subrecipient Title VI Plan – Williamson County, Tennessee.

Williamson County Government is the current subrecipient of Franklin Transit and maintains its own Title VI Plan. To ensure subrecipients remain compliant under Title VI regulations, Franklin Transit shall:

- Collect and maintain subrecipients' Title VI Program documents.
- Document that subrecipients are complying with the general requirements of Title VI.
- Conduct an on-site or desktop review to verify services are provided without regard to race, color, or national origin.
- Submit additional Title VI information to FTA as requested.

If a subrecipient is not in compliance with Title VI requirements, then Franklin Transit is not in compliance.

Section XII: Minority Representation on Boards, Planning Committees and Advisory Boards

The Franklin Transit Authority is the governing body of Franklin's transit system. Franklin Transit Authority By-Laws, Article III, Section 3, Members (1) Appointment and Term, states that the members of the Authority shall be appointed by the Mayor and confirmed by the Board of Mayor and Aldermen (BOMA) for staggered four (4)-year terms, beginning July 1 of that term. No member shall serve more than three (3) consecutive terms. At least one (1) member shall be an Alderman. All members shall be citizens of the City of Franklin, Tennessee, at all times during their tenure.

The seven-member governing body of Franklin Transit currently consists of:

- John Schroer, Chairman – term expiring July 1, 2027
- Eric McElroy – term expiring July 1, 2029
- Patrick Baggett, City of Franklin Alderman – term expiring July 1, 2029
- Doris McMillian – term expiring July 1, 2028
- Scotty Bernick – term expiring July 1, 2028
- Leya White - term expiring July 1, 2027
- Deanna Lambert - term expires July 1 2029

The Franklin Transit Board meets every other month (six regularly scheduled meetings per calendar year), with special meetings scheduled as needed. Recruitment for engaged and involved individuals to serve on Franklin Transit is ongoing, with priority given to recruiting individuals who have a genuine interest in serving to lead, champion, and enrich Franklin's public transportation system.

See Attachment B: Racial Breakdown of Franklin Transit Authority Board.

Section XIII: Title VI Equity Analysis to Determine Site or Location of Facilities

N/A – Franklin Transit Authority has had no projects requiring land acquisition or the siting of a new transit facility in the past three (3) years. Should Franklin Transit undertake a project involving the acquisition of real property or the siting of a new facility, an equity analysis will be conducted comparing the demographics of the proposed site area to the demographics of alternative sites considered, consistent with FTA Circular 4702.1B, prior to the final decision.

Section XIV: Title VI Assurance

As required by the contractual agreement, Franklin Transit Authority (FTA) will comply with the applicable laws and regulations related to nondiscrimination in federally or state assisted programs of the Tennessee Department of Transportation.

FrTA assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the Tennessee Department of Transportation (TDOT).

FrTA further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs or activities are federally funded or not.

In the event FrTA distributes federal financial assistance to a consultant, contractor, or subcontractor and other participants, FrTA will include Title VI nondiscrimination language in all written agreements and will monitor the consultant, contractor, or subcontractor and other participants for compliance. The Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by 23 CFR 200 and 49 CFR 21.

As required by the contractual agreement, FrTA will comply with the applicable laws and regulations relative to nondiscrimination in federally or state assisted programs of the Tennessee Department of Transportation (TDOT).

It is the policy of the Tennessee Department of Transportation to ensure compliance with Title VI of the Civil Rights Act of 1964; related statutes and regulations to the end that no person shall be excluded from participation in or be denied benefits of or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin.

Debbie Henry

Debbie Henry, President and CEO, Franklin Transit Authority

Date: July 2026

Attachment A: Racial and Ethnic Demographics of Franklin and the Franklin Transit Service Area

The following data reflects the U.S. Census Bureau's American Community Survey (ACS) 2020–2024 5-Year Estimates, the most current data available, for the City of Franklin, Tennessee — the primary service area for Franklin Transit's fixed-route and TODD On Demand services.

City of Franklin Population Overview

Measure	Value
Total Population (2024 estimate)	89,142
Total Population (2025 estimate)	90,226
Total Population, 2020 Census	83,454
Population Growth, 2020–2025	+8.0%
Persons under 18 years	23.4%
Persons 65 years and over	14.7%
Foreign-born persons	11.9%
Language other than English spoken at home (age 5+)	14.1%
Persons in poverty	4.6%

Racial and Ethnic Composition

Source: U.S. Census Bureau, American Community Survey (ACS) 2020–2024 5-Year Estimates.

Race / Ethnicity	% of Population	Estimated Population
White alone	75.7%	67,485
Black or African American alone	5.3%	4,725
American Indian and Alaska Native alone	0.4%	357
Asian alone	8.2%	7,310
Native Hawaiian and Other Pacific Islander alone	0.0%	<50
Two or More Races	8.5%	7,577
Hispanic or Latino (of any race)*	8.1%	7,220
White alone, not Hispanic or Latino	74.4%	66,317

**Hispanic or Latino is an ethnicity category, not a race; persons of Hispanic or Latino origin may be of any race and are also included in the applicable race categories above, consistent with U.S. Census Bureau methodology.*

Comparison to Williamson County and Franklin Transit Subrecipient Area

Franklin Transit's subrecipient, Williamson County Government, serves a broader county-wide population that is somewhat less racially diverse than the City of Franklin. Per the most recent ACS estimates, Williamson County's population is approximately 87.4% White, 4.9% Black or African American, and 3.8% Hispanic or Latino. This comparison is provided for context in evaluating the county-wide vanpool program administered by Williamson County as a Franklin Transit subrecipient.

Use of Demographic Data

Franklin Transit uses this demographic data to:

- Support the Four Factor Analysis for the Limited English Proficiency (LEP) Plan (see Section VIII).
- Support disparate impact and disproportionate burden analysis for proposed fare changes and major service changes (see Section VII.B).
- Evaluate the equitable distribution of transit amenities, vehicle assignments, and service standards system-wide (see Section VII.C).
- Assess minority representation on the Franklin Transit Authority Board (see Section XII and Attachment B).

Franklin Transit will update this demographic profile with each triennial Title VI Plan update, or sooner if significant demographic shifts are identified in the service area.

Attachment B: Racial Breakdown of Franklin Transit Authority Board

	Caucasian	African American	Latino	Asian American	Native American	Total
Population (Board Members)	6	1	0	0	0	7
Female	2	1	0	0	0	3
Male	4	0	0	0	0	4

Franklin Transit Authority's board members are appointed by the City of Franklin Mayor and confirmed by the Board of Mayor and Aldermen (BOMA). The Board currently consists of seven (7) members, with three (3) female members and four (4) male members, and includes one (1) African American member and six (6) Caucasian members.

Franklin Transit continues to encourage broad community participation in board recruitment and will consider demographic representation, alongside qualifications and community interest, as vacancies arise, consistent with the appointment authority of the City of Franklin Mayor and BOMA.

Attachment C: Title VI Discrimination Complaint Form and Complaint Log

The Title VI Discrimination Complaint Form (available in English and Spanish) is published on the Franklin Transit website at franklintransit.org/civil-rights and may also be requested by contacting the Title VI Coordinator at (615) 790-4005 or mlee@tmagroup.org. The form requests the following information:

1. Complainant's name, address, and telephone number(s).
2. Name, address, and telephone number of the person discriminated against, if other than the complainant.
3. Name and location of the person/entity believed to have discriminated.
4. Basis of the alleged discrimination (race, color, or national origin) and the date it occurred (must be within the past 180 days).
5. A narrative description, in the complainant's own words, of the alleged discrimination.
6. Whether the complainant has attempted to resolve the complaint through internal grievance procedures elsewhere.
7. Whether the complaint has been filed with any other federal, state, or local agency or court.
8. Whether the complainant intends to file the complaint with another agency.
9. Whether the complaint has been filed with Franklin Transit before.
10. Whether the complainant has filed other discrimination complaints with Franklin Transit.
11. Complainant's signature and date.

Note: We ask for this information to assist in processing complaints. If a complainant needs help completing the form, the Title VI Coordinator will assist at a mutually convenient time by calling (615) 790-4005. If Franklin Transit staff assists in completing the form, the complainant must still sign it to validate the information provided.

Complaint Log

Franklin Transit's Title VI Coordinator maintains a running complaint log recording, at minimum: case number, investigator, complainant, respondent, type of complaint, date opened, date the preliminary report was sent, date of final report, and disposition/decision. No Title VI complaints alleging discrimination on the basis of race, color, or national origin were received by Franklin Transit during the 2025–2026 reporting period.

Case No.	Investigator	Complainant	Respondent	Type of Complaint	Date Open	Final Report	Decision

Complaint Correspondence Templates

Franklin Transit maintains standard correspondence templates for: (1) a Letter Acknowledging Receipt of Complaint; (2) a Letter Notifying Complainant that a Complaint is Substantiated; and (3) a Letter Notifying Complainant that a Complaint is Not Substantiated, consistent with the procedure in Section V. These templates are available from the Title VI Coordinator.

Title VI Discrimination Complaint Form

The form below is reproduced from Franklin Transit's official complaint packet for use by complainants, Franklin Transit staff, and the Title VI Coordinator. It may be printed and completed by hand, or completed with the assistance of the Title VI Coordinator at (615) 790-4005.

Case Number

Note: We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know. If you are not able to complete the form personally, the Title VI Coordinator will assist you to do so at a mutually convenient time. Simply call (615) 790-4005 to make your request. If the Title VI Coordinator assists you in completing the form, you will still need to sign it to validate the information provided.

1. Complainant's Information

Name

Street Address

City, State and Zip Code

Telephone Number – Home

Telephone Number – Business

2. Person Discriminated Against (if someone other than the complainant)

Name

Street Address

City, State, and Zip Code

Telephone Number

Where You May File This Complaint

You may file this complaint directly with Franklin Transit, and/or with either of the following oversight agencies. Check all that apply to indicate where you are filing this complaint:

- ☐ Franklin Transit Authority – 708 Columbia Avenue, Franklin, TN 37064 – (615) 790-4005
- ☐ Federal Transit Administration (FTA), Office of Civil Rights – Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
- ☐ Tennessee Department of Transportation (TDOT), Civil Rights Division – 12 Rosa L. Parks Avenue, William R. Snodgrass Tennessee Tower, 15th Floor, Nashville, TN 37203 – (615) 741-3681

A complaint may be filed with more than one agency at the same time; filing with Franklin Transit does not affect a complainant's right to also file with FTA or TDOT, or to seek private counsel.

3. What is the name and location of the person/entity that you believe discriminated against you?

Name

Location

4. Which of the following best describes the reason you believe discrimination took place? Was it because of your:

a. Race (specify why)

b. Color (specify why)

c. National Origin (specify why)

d. Date the alleged discrimination took place (must be within the past 180 days)

5. In your own words, describe the alleged discrimination. Explain what happened, and who you believe was responsible. (Use more sheets, if needed.)

6. Have you tried to resolve this complaint through internal grievance procedures elsewhere?

☐ Yes

☐ No

If yes, what is the status of the grievance?

Name and title of the person who is managing the grievance procedure

7. 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

8. Please provide information about a contact person at the other agency/court where the complaint was filed:**Name**

Street Address

City, State, and Zip Code

Telephone Number

9. Do you intend to file this complaint with another agency?☐ Yes☐ No**If yes, when and where do you plan to file the complaint?****Date**

Agency

Street Address

City, State, and Zip Code

Telephone Number

10. Has the complaint been filed with Franklin Transit before?☐ Yes☐ No**If yes, when? Date?**

11. Have you filed any other discrimination complaints with the Franklin Transit Authority?☐ Yes☐ No**If yes, when and against whom were they filed?****Date**

Agency

Street Address

City, State, and Zip Code

Telephone Number

12. Please sign and date this form below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date

If this form was completed by someone other than the complainant, please provide information about who assisted the citizen with this document.

Name

Title

Complaint Correspondence Templates (Full Text)

The following templates are used by the Title VI Coordinator to acknowledge and resolve complaints, consistent with the procedure in Section V of this Plan.

Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe

1234 Main Street

Franklin, Tennessee 37064

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against The Franklin Transit Authority alleging _____ in the _____ program.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (615) 790-4005 or writing to me at this address: 708 Columbia Avenue, Franklin, TN 37064.

Sincerely,

MiMi Lee

Title VI Coordinator

Letter Notifying Complainant That Complaint Is Substantiated

Today's Date

Ms. Jo Doe

1234 Main Street

Franklin, Tennessee 37064

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against The Franklin Transit Authority alleging denial of participation of minorities in the _____ program has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

MiMi Lee

Title VI Coordinator

Letter Notifying Complainant That Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe

1234 Main Street

Franklin, Tennessee 37064

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against The Franklin Transit Authority alleging _____ in the program has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The President and CEO has analyzed the materials and facts pertaining to your case for evidence of The Franklin Transit Authority failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

MiMi Lee

Title VI Coordinator

Attachment D: Title VI Non-Discrimination Statement / Notice to the Public

The official Title VI Notice to the Public is posted at Franklin Transit vehicles, facilities, and the transit office in both English and Spanish. The notices as posted are reproduced below.

English



Title VI Notice to the Public

Franklin Transit Authority

Franklin Transit Authority operates its services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he/she has been subjected to discrimination may file a complaint with the Franklin Transit Authority.

For more information on the Franklin Transit Authority civil rights program and the procedures to file a complaint, contact 615.790.4005; email mlee@tmagroup.org or visit the transit office at 708 Columbia Avenue, Franklin, TN 37064. For more information, visit www.franklintransit.org

A complainant may also file a complaint directly with the Tennessee Department of Transportation (TDOT), Civil Rights Division, 12 Rosa L. Parks Avenue, William R. Snodgrass Tennessee Tower, 15th Floor, Nashville, TN 37203; phone 615.741.3681. For more information, visit www.tn.gov/tdot

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590. For more information, visit www.fta.dot.gov

Español

Aviso al público sobre el Título VI

Autoridad de Tránsito de Franklin

La Autoridad de Tránsito de Franklin (Franklin Transit Authority) presta sus servicios sin distinción de raza, color o país de origen de acuerdo con el Título VI de la Ley de Derechos Civiles. Toda persona que crea que ha sido objeto de discriminación puede presentar una queja ante la Autoridad de Tránsito de Franklin.

Para obtener más información del programa de derechos civiles de la Autoridad de Tránsito de Franklin y los procedimientos para presentar una queja, comuníquese llamando al 615.790.4005; enviando un correo electrónico en mlee@tmagroup.org o visitando la oficina de tránsito en 708 Columbia Avenue, Franklin, TN 37064. Para obtener más información, visite www.franklintransit.org

Un demandante también puede presentar una queja directamente ante el Departamento de Transporte de Tennessee (TDOT), División de Derechos Civiles, 12 Rosa L. Parks Avenue, William R. Snodgrass Tennessee Tower, piso 15, Nashville, TN 37203; teléfono 615.741.3681. Para obtener más información, visite www.tn.gov/tdot

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentándola ante la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590. Para obtener más información, visite www.fta.dot.gov

Attachment E: Subrecipient Title VI Plan – Williamson County, Tennessee

Williamson County Government is a subrecipient of Franklin Transit federal funding, administering Section 5307 funds for its regional commuter vanpool program (operating assistance, mobility management, leasing, and security). Williamson County maintains its own Title VI Program, documentation for which is published by Williamson County's Human Resources Department. This attachment reflects the current documents obtained directly from Williamson County in connection with this 2026 update, superseding the county's prior (2005-signed) Title VI Plan previously on file.

E.1 – Title VI Coordinator and Contact Information

Williamson County Government's current, general (county-wide) Title VI Coordinator, as published on the county's Human Resources and Title VI webpages, is:

Title VI Coordinator, Williamson County Government

Leisa.Niemotka@williamsoncounty-tn.gov

Mailing Address

1320 West Main Street, Suite 112, Franklin, TN 37064

Telephone

(615) 591-8509

Williamson County Juvenile Court maintains a separate, court-specific Title VI/Title IX Coordinator for matters arising within Juvenile Services:

Title VI Coordinator, Williamson County Juvenile Court

Chris Holz – Chris.holz@williamsoncounty-tn.gov

The Juvenile Court process is broader in scope than federal Title VI — it also addresses Title IX (sex/gender) and other discrimination grounds — and is specific to Juvenile Services matters. It is not the process applicable to Franklin Transit's vanpool subrecipient relationship, which falls under the general Williamson County Government Title VI Coordinator (Karla Roos) referenced above. It is included here for completeness, since Franklin Transit's monitoring file for this subrecipient captures the full scope of Williamson County's current Title VI program.

E.2 – Title VI Nondiscrimination Statement

Williamson County Government publishes the following Title VI Nondiscrimination Statement, in English and Spanish, consistent with its obligations as a recipient of USDOT federal financial assistance:

English

Williamson County Government ensures compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, Part 21; related statutes and regulations, to the end that no person shall be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin. Any person who believes he or she has been discriminated against may file a complaint with the appropriate agency.

Español

Williamson County Government asegura el cumplimiento del Título VI del Acto de Derechos Civiles de 1964; 49 CFR, Parte 21, y las leyes y normas relacionadas, para asegurar que ninguna persona sea excluida de la participación en, o se le nieguen los beneficios de, o sea objeto de discriminación bajo ningún programa o actividad que reciba asistencia financiera federal del Departamento de Transporte de los Estados Unidos, por motivos de raza, color u origen nacional. Cualquier persona que crea que ha sido objeto de discriminación puede presentar una queja ante la agencia correspondiente.

Referral agencies published on the Nondiscrimination Statement include:

- Williamson County Government – Title VI Coordinator: 1320 West Main Street, Franklin, TN 37064; (615) 591-8509
- TN Department of Transportation: 12 Rosa L. Parks Avenue, William R. Snodgrass Tennessee Tower, 15th Floor, Nashville, TN 37203; (615) 741-3681 / Fax: (629) 265-7330
- TN Human Rights Commission: William R. Snodgrass BLD/TN Towers, 312 Rosa Parks Ave., 23rd Floor, Nashville, TN 37243; (800) 251-3589
- FHWA Office of Civil Rights: 1200 New Jersey Ave., S.E., 8th Floor E81-314, Washington, DC 20591; (202) 366-0693
- FTA Office of Civil Rights – Title VI Coordinator: East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, DC 20590; (888) 446-4511

E.3 – Title VI Complaint Procedure

Williamson County's Title VI Complaint Procedure (published in Spanish as “Procedimiento de Quejas del Título VI”, with the same substantive steps published in English) is unchanged in substance from the procedure previously on file, and proceeds as follows:

1. The complainant calls or comes in with a complaint. The complaint must include the complainant's name, address, telephone number, and signature. A formal complaint must describe in detail the alleged discriminatory act that violates Title VI, and must be filed within one hundred eighty (180) calendar days of the alleged incident.
2. Complaints filed against Williamson County: logged and forwarded to the Tennessee Department of Transportation (TDOT) or the agency having jurisdiction within three (3) business days.
3. Complaints filed against a contractor or subcontractor of Williamson County will be processed and investigated by Williamson County.
4. Williamson County will maintain a log of all complaints and appeals, and will forward an initial report to TDOT within seven (7) business days.
5. A copy of the complaint will also be forwarded to the alleged discriminating contractor or subcontractor, including the name and telephone number of the Title VI officer assigned to investigate the complaint.
6. The investigating officer will initiate the investigation and first contact the complainant by telephone within three (3) business days of receiving the assignment, to schedule an interview. The complainant will be informed of the right to have a witness or representative present, and may submit any documentation considered relevant to the complaint.
7. The alleged discriminating contractor or subcontractor will have the opportunity to respond to the complainant's allegations.
8. The investigating officer will determine, based on relevance or duplication of evidence, which witnesses will be contacted and questioned.
9. The investigating officer will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and will give the complainant an opportunity to provide a rebuttal statement.
10. The investigation will be completed and a final report sent to TDOT, the alleged discriminating contractor or subcontractor, and the complainant within sixty (60) calendar days of the date the complaint was received. The final report will include: the written complaint containing the allegation, basis, and filing date; summarized witness statements; findings of fact; an opinion (based on all evidence in the record) as to whether the incident is substantiated or not substantiated; and corrective measures in substantiated cases.
11. If corrective measures are recommended, the alleged discriminating contractor or subcontractor will have thirty (30) calendar days to inform the Title VI Officer of the actions taken to come into compliance.
12. Corrective actions may take the form of actions to be completed on a future date beyond the initial thirty (30) days, with projected timeframes; all corrective actions must be completed within sixty (60) days of the date the recommendation is made.
13. If recommended corrective measures are not taken within the thirty (30)-day period allowed, the contractor or subcontractor will be found in noncompliance with Title VI implementing rules and regulations, and a referral will be made to TDOT for enforcement action.

14. Appeal procedures: the complainant has the right to appeal any written findings to TDOT. The appeal must be made in writing to the TDOT Title VI Director within fourteen (14) days of receipt of Williamson County's final report, and must specifically cite the finding(s) with which the complainant disagrees and the reasons for disagreement. The TDOT Title VI Director will forward the appeal within seven (7) days to the TDOT Title VI Advisory Board for review, which will be based on the complete record. The Board must complete its review within thirty (30) calendar days of receipt of the appeal, and will send its written findings to the complainant and the TDOT Commissioner.

Source: Williamson County, Tennessee, "Procedimiento de Quejas del Título VI" (Title VI Complaint Procedure), obtained from Williamson County Human Resources, October 2025.

E.4 – Title VI Complaint Forms

Williamson County Government publishes a general Title VI Discrimination Complaint Form, available in English and Spanish, for complaints against the county government generally (including its subrecipient functions, such as the vanpool program relevant to Franklin Transit). The form requests the following information:

English – “Discrimination Complaint Form: Title VI”

1. Section I: Complainant's name, address, home/work telephone numbers, and email address; accessible format requirements (Large Print, Audio Tape, TDD, or Other).
2. Section II: Whether the complainant is filing on their own behalf or on behalf of a third party (with confirmation that permission of the aggrieved party has been obtained).
3. Section III: The basis of the alleged discrimination (Race, Color, and/or National Origin), the date of the alleged discrimination, and a narrative description of what happened, including names and contact information of those involved and any witnesses.
4. Section IV: Whether a Discrimination Complaint has previously been filed with the agency.
5. Section V: Whether the complaint has been filed with any other federal, state, or local agency or court, with contact information for that agency/court.
6. Section VI: The name of the agency and/or person the complaint is against, their title, location, and telephone number, followed by the complainant's signature and date.

Submission address: Williamson County Government, Title VI Coordinator, 1320 W. Main St., Suite 112, Franklin, TN 37064; (615) 591-8509. The form is also available online at williamsoncounty-tn.gov/121/Human-Resources.

Español – “Título VI – Formulario de Queja” (Revised 6/18/21)

The Spanish-language complaint form (a more detailed 7-part version, last revised June 18, 2021) requests: (1) the basis of the alleged discrimination (race/color, ethnic origin/national origin, or other); (2) the date(s) of the alleged discrimination; (3) the complainant's contact information; (4) the name of the agency, department, or program alleged to have discriminated; (5) a narrative description of the alleged discrimination; (6) names and contact information of any witnesses; and (7) whether the complaint has been filed with any other federal, state, or local agency or court. The form must be signed and dated, and may be submitted with supporting materials to the same Title VI Coordinator address above.

The Spanish-language form lists an expanded set of referral agencies beyond those on the Nondiscrimination Statement, including the TDOT Civil Rights Division, TN Human Rights Commission, the Tennessee Equal Employment Opportunity Commission, FHWA Office of Civil Rights, FTA Office of Civil Rights, the FAA Office of Civil Rights, and the U.S. Department of Justice Civil Rights Division — reflecting that Title VI complaints may be routed to whichever federal modal agency or state civil rights body has jurisdiction over the underlying program.

E.5 – Williamson County Juvenile Services Title VI/IX Complaint Process (Reference Only)

For completeness, Williamson County Juvenile Court/Juvenile Services maintains its own “Title VI/IX Complaint” form, distinct from the general county government form above. It is broader than federal Title VI alone — covering race/color/national origin as well as gender (Title IX) and other grounds — and applies specifically to Juvenile Services matters, not to Franklin Transit's vanpool subrecipient relationship. Its complaint form requests:

1. Complainant's name, address, and home/business telephone number(s).
2. The person discriminated against, if other than the complainant.
3. The name, address, and telephone number of the institution, office, or agency believed to have discriminated, and the names of the person(s) believed responsible.
4. The basis of the alleged discrimination: Race/Color/National Origin, Gender, or Other (specify).
5. The date the alleged discrimination took place.
6. A narrative description, in the complainant's own words, of the alleged discrimination.
7. Whether the complainant has attempted resolution through the institution's employee grievance procedure, and its status.
8. Whether the complaint has been filed with any other federal, state, or local agency or court, and contact information for that body.
9. Whether the complainant intends to file with another agency.
10. Whether the complaint has been filed with the agency before.
11. The complainant's signature.

Williamson County Juvenile Court Title VI Coordinator: Chris Holz – Chris.holz@williamsoncounty-tn.gov. This process is retained in Franklin Transit's subrecipient monitoring file for reference only and does not govern complaints related to Franklin Transit funding.

Attachment F: Photographic Documentation of Posted Notices

The photographs below document Franklin Transit's current, in-service compliance with the posting and notice requirements described in Section IV (Notice to Beneficiaries) and Section VIII (Limited English Proficiency Plan) of this Title VI Plan. Photographs were taken on board a Franklin Transit revenue vehicle and at the Franklin Transit Center public service counter.

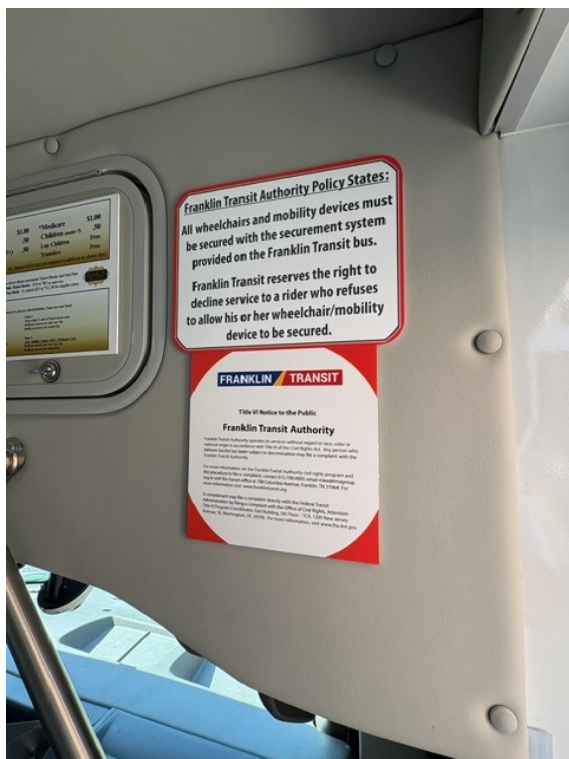
On-Board Signage

[Photograph placeholder – Franklin Transit to insert] Interior of a Franklin Transit revenue vehicle, showing the posted wheelchair and mobility device securement policy alongside the Title VI Notice to the Public. Both notices are mounted together and are visible to riders during boarding.

Public Area Signage

[Photograph placeholder – Franklin Transit to insert] Franklin Transit Center service counter, showing the posted Interpretation Services Available notice (language assistance) alongside additional public notices in the customer-facing lobby area, consistent with the LEP Plan's notice and outreach requirements.

These postings satisfy the requirement in Section IV that notices be displayed throughout Franklin Transit facilities and revenue vehicles, and the requirement in Section VIII that language assistance be identified and made known to riders at points of contact. Franklin Transit will periodically re-photograph and update this attachment to confirm postings remain current, legible, and properly located as vehicles and signage are replaced.



Attachment G: Franklin Transit Authority Bylaws

The Franklin Transit Authority Bylaws, as amended June 18, 2024 and executed by the Authority's Secretary and Chairperson, are reproduced below in full.

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FRANKLIN TRANSIT AUTHORITY BYLAWS

Amended June 18, 2024

ARTICLE I.

Organization, Powers and Responsibilities

The conduct, operation, supervision, control, regulation, and jurisdiction of public mass transit in the area of Franklin, Williamson County, Tennessee, is vested in the Franklin Transit Authority by resolution of the Board of Mayor and Aldermen on May 5, 2003. Said Resolution defines the powers and the responsibility of the Authority and pursuant to Section 3 the Authority is required to create these bylaws. Any provision herein which may be deemed contrary to the charter, Resolution or T.C.A. § 7-56-101 is void. The exclusive management, control, and regulation of the operation of the public transportation system of the City of Franklin, Tennessee, is vested in the Franklin Transit Authority, which has the authority to delegate to management such power and authority as it may deem necessary and proper.

ARTICLE II.

Meetings

Section 1. Definitions.

1. **The Authority** – means the Franklin Transit Authority of the City of Franklin, Tennessee. For purposes of organization, the designation “Franklin Transit Authority” shall, unless use or context otherwise require, be construed to mean and shall refer to the legally constituted authority of seven members including the Chairperson.
2. **BOMA** – means the Board of Mayor and Aldermen of the City of Franklin, Tennessee.

Law Dept approved 06.11.24

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FRANKLIN TRANSIT AUTHORITY BYLAWS

3. **Executive Director** – shall be the chief administrative and chief executive officer of the Authority appointed by the Authority either through competitive bid or separate vote in the absence of a vendor selected through a competitive bid.
4. **Meeting** – means the convening of the Authority or a public body for which a quorum is required to make a decision or to deliberate toward a decision on any matter. Meeting may include any on-site inspection of any project or program only when the Authority will deliberate upon a decision, in which case the Open Meetings Act requirements shall apply.
5. **Member** – one who is appointed by the Board of Mayor and Aldermen of the City of Franklin, Tennessee, to the governing body, including the Chairperson.
6. **Open Meeting** – all meetings of the Authority are declared to be public meetings open to the public at all times except as provided by Tennessee law.
7. **Secretary of the Authority** – means the Assistant City Administrator, Community Development, or his/her designee.
8. **Chance Meeting** – nothing in this section shall prohibit the chance meeting of two or more members of the Authority. Such chance meetings shall not be used to decide or deliberate public business.

Section 2. Business Transactions.

1. At the regular meeting, the Authority may transact any business within its authority that it deems to be the proper concern of the Authority.
2. At special meetings, only such business may be transacted as is included in the call.
3. All regular or special meetings shall be open to the public to the extent required by the “Open Meetings” Law of the State of Tennessee (T.C.A. § 8-44-102 *et seq.*), as it now exists or may in the future be amended.

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FRANKLIN TRANSIT AUTHORITY BYLAWS

4. At all meetings four (4) members of the Authority shall constitute a quorum for the transaction of business and all questions before the Authority at the meeting shall be determined by a majority vote of these present, except as may be required by *Robert's Rules of Order Newly Revised* or as may otherwise be required by law.
5. No Member shall have an interest, whether direct or indirect, in any business that may come before the Authority.

Section 3. Officer's Duties.

1. The Chairperson shall preside at all meetings of the Authority. If the Chairperson is not present and a quorum is present, the Vice-Chairperson shall preside. If the Vice-Chairperson is not present, the members shall elect an acting Chairperson to preside at any such meeting.
2. The Secretary of the Authority shall, by virtue of the office, be secretary at all meetings. In the absence of the Secretary, an acting Secretary may be appointed by the presiding officer, and the person so appointed shall perform all the usual and customary duties of the Secretary. The appointment of the acting Secretary shall be noted in the minutes.
3. The minutes of all meetings of the Authority shall be accurately kept by the Secretary and shall be verified and signed by the Chairperson of the meeting upon the Authority's approval. The minutes of all Authority meetings shall be kept in permanent volumes at the principal offices of the Authority, well bound, and shall constitute a permanent record of the official action of the Authority.

Section 4. Meetings and Notices.

1. **Regular Meetings**

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FRANKLIN TRANSIT AUTHORITY BYLAWS

Regular meetings of the Authority may be held monthly on the first Tuesday every even month at 4:00 p.m. but shall meet at least quarterly, in the Board Room of the City Hall of Franklin, Tennessee, or such other public location as the Authority may determine from time to time. The Authority shall notice the meetings as required by state law. The notice shall be published within a reasonable time before the meeting. If another location is subsequently selected by necessity, notice shall be given by posting the new location on the Board Room door.

2. Special Meetings

- a) The Authority may hold Special Meetings as may be necessary and may conduct such business as may be designated by notice and agenda of such meeting to the members of the Authority.
- b) A Special Meeting may be called at any time by the Chairperson by notice to the members. The notice shall contain a statement of the purpose of the meeting, an agenda of business to be transacted, and the location, date and time of the meeting. No other business shall be considered at the Special Meeting.
- c) Notice of the Special Meeting shall be given to the Members electronically, and/or by United States Postal Service first class mail, and/or hand-delivered by Authority staff not less than three (3) days prior to the meeting, unless exceptional circumstances of an emergency nature exist.
- d) A Meeting may also be called by written petition by any four (4) Authority members to the Chairperson with a copy to the Executive Director, whereupon the Chairperson shall not fail or refuse to call the Special Meeting. Should the Chairperson be unavailable, the Vice-Chairperson shall call the Special Meeting. Notice of such meeting and the business that

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may be transacted shall conform in all respects to Special Meetings called by the Chairperson. The Secretary shall provide all notices required herein immediately upon receipt of the petition.

- e) Notice of Special Meetings describing the time, date, and location of regular meetings of the Authority shall be provided pursuant to state law and City policy.

3. Additional Notice.

A copy of all Meeting notices shall be posted at the offices of the Authority and information concerning each meeting shall be freely available to the public for inspection and copying.

ARTICLE III.

Officers, Members, Committees and Administrators.

Section 1. Officers.

1. A Chairperson of the Authority shall be elected by and from a majority of the members of the Authority, taking office July 1 of the same year. The Chairperson shall make such reports as to the discharge of his/her duties and the conduct of the business as may be prescribed by the Authority from time-to-time. The Chairperson shall sign all agreements for contracts, transfers and conveyances as required by law or as may be authorized by the Authority, except to the extent that such responsibility is or may be delegated to the Secretary by law or by appropriate action by the Authority. He/she shall be authorized to sign checks and vouchers drawn on the funds of the Authority.
2. A Vice-Chairperson shall be elected by and from the members of the Authority in the same manner as the Chairperson, taking office July 1 of the same year. The Vice-Chairperson shall exercise all powers and responsibilities of the Chairperson when the latter is not

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FRANKLIN TRANSIT AUTHORITY BYLAWS

available to act and discharge the duties of the office, including presiding as an ex-officio member of any committee or other administrative group appointed by the Authority.

3. A Secretary shall be appointed by the Chairperson and shall serve at the pleasure of the Authority, taking office July 1 of the same year. The duties and term of the Secretary of the Authority shall be fixed by the Authority and may be changed from time-to-time. The Secretary shall be responsible for ensuring that accurate records are kept of all Authority actions and shall be responsible for attesting to Authority contracts and other documents. It shall be the Secretary's duty to issue proper public notice of all meetings and that all resolutions or orders of the Authority are properly executed.

Section 3. Members.

1. Appointment and Term

The Members of the Authority shall be appointed by the Mayor and confirmed by the BOMA for staggered four (4)-year terms, beginning July 1 of that term. No Member shall serve more than 3 consecutive terms. At least one (1) Member shall be an Alderman. All members shall be citizens of the City of Franklin, Tennessee, at all times during their tenure.

2. Absences, Resignation and Vacancies

Any Member absent more than three (3) consecutive meetings without prior approval of the Authority shall be considered to have vacated the position. Any Member desiring to resign from the Authority shall give written notice to the Chairperson and Executive Director. The Executive Director shall give notice of resignations and vacancies shall be given to the Authority. At its next regular meeting, BOMA shall then appoint a new member to fill the remainder of the term.

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FRANKLIN TRANSIT AUTHORITY BYLAWS

3. Removal from office

A Member can only be removed a two-thirds vote of the entire governing body.

Section 4. Committees.

1. The Chairperson of the Authority, in addition to those duties prescribed by law, shall preside at all meetings of the Authority and shall be an ex-officio member of any committee or other administrative group that may be appointed by the Authority from time-to-time.
2. The Authority may appoint ad hoc committees on an as-needed basis. Such committees shall have the power to investigate, deliberate, and report or recommend to the Authority such action it deems in the best interests of the Authority and the City of Franklin, Tennessee. Upon issuing a final report or recommendation, an ad hoc committee shall automatically be dissolved without further action by the Authority. The membership and Chairperson of an Ad Hoc Committee shall be appointed by the Chairperson of the Authority and approved by the members of the Authority. The Chairperson of the Authority shall be an ex-officio member of all Ad Hoc committees.

Section 5. Administrators.

1. The Authority may appoint a vendor on a contractual basis to serve the Authority. Additionally, an employee of the vendor shall act as Executive Director who shall be appointed by the Authority and shall be accountable to the Authority. To avoid a conflict of interest during contract negotiations for the position of Executive Director, an Assistant City Administrator shall act as the Executive Director only with respect to those negotiations, through and including contract execution and any subsequent amendment. In the absence of a vendor, an Assistant City Administrator shall act as the Executive Director until one can be appointed by the Authority.

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2. The Executive Director shall be the chief administrative and chief executive officer of the Authority, subject to the supervision and control of the Authority as these bylaws prescribe. The Executive Director shall have charge of the immediate management and operation of the public mass transit system and properties and operations of the Authority and shall be directly charged with the enforcement and execution of all rules, regulations, programs, plans and decisions of the Authority.
3. Subject to the supervision of the Authority and the City of Franklin, Tennessee, and, on the limits of the provisions of law and the resolutions and orders of the Authority, the Executive Director shall be charged with and shall have control over the conduct and operation of public transportation.
4. Financial matters of the Authority shall be managed by the City of Franklin, Tennessee. When necessary, the Executive Director shall be authorized to sign checks or vouchers drawn on the funds of the Authority and shall be responsible for the filing of all reports required to be prepared, furnished, or filed for or on behalf of the Authority. The Executive Director shall receive and be custodian of all funds payable to the Authority by reason of the operation and conduct of its business and shall be charged with the responsibility therefore, the safekeeping thereof, and the deposit in conformity with the provisions of the law and the orders and resolutions of the Authority.
5. The Executive Director shall be responsible for the inauguration and maintenance of the proper and efficient accounting system acceptable to the City of Franklin's Finance Director, and shall keep, or provide and have kept under his/her authority and direction, a full and complete set of books and records of business of the Authority. The Executive Director shall be responsible for keeping the Authority apprised of local, state and federal

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governing authorities' actions relating to transportation issues affecting the Authority. He/she shall be familiar with all relevant emergency preparedness plans and implement necessary training programs.

ARTICLE IV.

GENERAL PROVISIONS

Section 1. Duties, Powers and Compensation.

1. All officers, members, committees and administrators shall perform the duties as prescribed by these bylaws, consistent with the Authority's powers and as prescribed by the parliamentary authority as adopted by the Authority. All officers, members and committees shall serve without compensation, except for reimbursement for actual expenses related to the performance of Authority duties outside of Regular or Special Meetings.

Section 2. Budgets, Contracts and Finance.

1. The proposed budgets to cover the next succeeding fiscal year shall be submitted to the Authority at a meeting prior to April 1. The Executive Director shall propose to the Authority and the Authority shall recommend to BOMA a budget for the next succeeding fiscal year. A budget, once adopted by BOMA, may be amended by the Authority as may be necessary from time-to-time, except that no transfers between functional areas (i.e., personnel, operations and capital) shall be permitted without BOMA approval. Any reallocations greater than \$10,000.00 must be separately approved by BOMA.
2. All contracts, agreements, transfers and conveyances shall be made and all property shall be acquired, held, owned, and transferred in the name of the City of Franklin, Tennessee, by and through its agent, the Franklin Transit Authority, and all such contracts, agreements,

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transfers, and conveyances shall be signed by the Chairperson of the Authority and attested by the Secretary and approved as to form by the City Attorney or his/her designee.

3. All bills, notes, bonds, mortgages, and other charges placed upon the Authority in order to be valid shall be signed by the Chairperson of the Authority and the Mayor upon approval by BOMA and attested by the Secretary.
4. Checks, bills, notes, and other evidences of indebtedness due the Authority may be payable to the “Franklin Transit Authority” and all such bills, notes, and evidences of indebtedness payable to the Authority shall be endorsed and deposited in the authorized depository of the Authority within three (3) business days.
5. The Authority’s management team and all others, who by virtue of their office, are responsible for the funds and property of the Authority or the City of Franklin, Tennessee, shall be required to execute good and sufficient bonds and in such an amount as may be prescribed by resolution of the Authority.
6. All funds of the Authority shall be deposited, kept and maintained in such depository or depositories as the Authority may from time to time designate by motion, rule or regulation; all such funds being deposited in the name of the City of Franklin, Tennessee, by and through its agent, the Franklin Transit Authority. The City of Franklin, Tennessee, shall have sole authority to issue revenue bonds for the purchase of properties of the Authority.

Section 3. Purchases.

All purchases made by and for the Authority shall be in accordance with the laws of and/or contracts with the United States of America, the State of Tennessee, the Charter of the City of Franklin, Tennessee, such ordinances as may have been adopted, rules and regulations of the Division of Purchases of the Department of Finance of the City of Franklin,

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FRANKLIN TRANSIT AUTHORITY BYLAWS

Tennessee and such other rules and regulations as shall be from time to time adopted by the Authority.

Section 4. Annual Audit.

The Authority shall provide annually an audit in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits issued by the Comptroller General of the United States; and the U.S. Office of Management and Budget (OMB) Circular A-133 and requirements prescribed by the Comptroller of the Treasury, State of Tennessee. Compliance in accordance with the laws, regulations, contracts and grants applicable to major federal programs is the responsibility of the Authority. Disclosure regarding grants from State and Federal agencies shall be presented in a manner that is complete in detail, arranged in form to comply with the requirement of the City's auditing firm, and sufficient for the preparation of the City's Comprehensive Annual Financial Report.

ARTICLE V.

ORDER OF BUSINESS AND PARLIAMENTARY AUTHORITY

Section 1. Order of Business.

1. The order of business of all meetings other than Special Meetings of the Authority may be as follows:

A Chairperson and Secretary being present or elected or appointed as hereinabove provided:

- Call to order, including determination that quorum is present
- Public comments or public hearings where appropriate

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- Consent Calendar, may include Approval of the minutes of the preceding meeting, financial statements, etc.
 - Election or appointment of officers, when appropriate
 - Old Business, including action items on deferral
 - New Business, including Appointment of Committees or other actions for transaction of business to come before the Authority at future meetings
 - Other Business
 - Committee Reports and Information Items
 - Reports from Chairperson and Executive Director
 - Adjournment
2. The Authority agenda and items for action and information of all Regular Meetings shall be prepared by the Secretary and a copy of such agenda shall be delivered to the City Recorder and to each Authority member by electronic mail, first class mail, or hand delivered to be received by said member at least four (4) days prior to such meeting.

Section 2. Parliamentary Authority.

The rules contained in the current edition of *Robert's Rules of Order Newly Revised* shall govern the Authority in all cases to which they are applicable and in which they are not inconsistent with these bylaws and any special rules of order the Authority may adopt.

ARTICLE VI.

Amendment

These Bylaws may be altered or amended by affirmative vote of a majority of the members of the entire Authority at any properly constituted meeting, whether Regular or Special, provide

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that notice is given in the previous meeting and, in the case of Special Meetings, such action is specified in the notice given thereto.

ARTICLE VII.**Adoption and Effective Date**

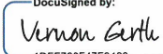
These bylaws of the Authority have been adopted or amended on the following dates and are effective immediately.

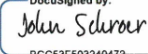
Adopted 18th day of June, 2024.

CERTIFICATE

The undersigned certify that the foregoing Bylaws were adopted by the Franklin Transit Authority at a Regular Meeting or a Special Meeting called for such purposes as set forth on the agenda in which the item for vote on the bylaws was set forth on this 18th day of June, 2024.

ATTEST:**FRANKLIN TRANSIT AUTHORITY**

BY: 
1BFF790F47F3468
VERNON GERTH, Secretary

BY: 
B06653F503240472
JOHN SCHROER, Chairperson

Approved as to form by:


5005D130BCE04F0
SHAUNA R. BILLINGSLEY, City Attorney