

**THREE RIVERS REGIONAL COMMISSION**

*October 22/2014 – Date Adopted*

**Title VI Plan**

#### 

#### ****Preface****

This template has been developed by the Three Rivers Regional Commission (TRRC) in order to assist with the development of the Title VI Plan and Title VI requirements for sub-recipient transit providers that operate less than 50 vehicles in peak service and are located in urbanized areas (UZA) of less than 200,000 population and rural transit providers. Although each agency is different in size, organization structure, operations, etc., minimum Title VI compliance requirements are common to all. This template document is intended to including but not limited to minimum requirements of Section 49 Code of Federal Regulations, Part 21 and Federal Transit Administration (FTA) Circular 4702.1B.

TRRC has also included a list of vehicles used by the Sub-Recipient (TPO) indicating the age, and capacity of each. The Policy and Procedures according to FTA, GDOT, and DHS standards has also been included in compliance with section 10.1 of the System – Wide and Service Standards and Policies.

**Title VI Plan Activity Log**

|  |  |  |  |
| --- | --- | --- | --- |
| **Date** | **Activity**  **(Review/Update/Addendum/ Adoption/Distribution)** | **Concerned Person (Signature)** | **Remarks** |
| 9/30/2014 | Webinar Training and Development |  |  |
| 11/22/2014 | Adoption of Title VI |  |  |
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**Title VI Plan Activity Log**

**(Continued)**

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| **Date** | **Activity**  **(Review/Update/Addendum/ Adoption/Distribution)** | **Concerned Person (Signature)** | **Remarks** |
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# Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

TRRC assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

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

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against TRRC.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

**THIS ASSURANCE** is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature:

Printed Name:

Executive Director/Signatory Authority, Your Transit System, Date: Month/Day/Year

# Introduction & Description of Services

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

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

TRRC is a sub-recipient of FTA funds and provides service in Region 4. A description of the current TRRC system is included in Appendix B.

### Title VI Liaison

Mamie Tomys

Three Rivers Regional Commission

Contracts Administrator

678-510-0510

120 North Hill Street

Griffin, Ga. 30224

### Alternate Title VI Contact

Robert Hiett

Three Rivers Regional Commission

Govt. Service Director

678-510-0510

120 North Hill Street

Griffin, Ga. 30224

The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

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

## First Time Applicant Requirements

TRRC is not a first time applicant for FTA/GDOT funding. The following is a summary of TRRC’S current and pending federal and state funding.

Current and Pending FTA Funding

1.5316 (JARC), 8/12/12, $131,250, Current

2. 5317 (New Freedom), Pending

3. 5311, 9/1/2009. Operations $338,888, Capital $214,582, Current

Current and Pending GDOT Funding

1. 5311, 09/01/2009, $26,823 Current

2. 5310, 7/5/2010, $93,667, Current

During the previous three years, FTA or GDOT did not complete a Title VI compliance review of TRRC. TRRC has not been found to be in noncompliance with any civil rights requirements.

## Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

TRRC will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT and any other primary recipient.

## Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on 12/31/2014. The Plan was approved and adopted by TRRC during a meeting held on 10/23/2014. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

# Title VI Notice to the Public

## Notice to Public

TRRC operates programs without regard to race, color, disability, and national origin. A description of the procedures members of the public should following order to request additional information on the grantee’s nondiscrimination obligations can be found on the FTA Circular 4702.1B, Chapter 3, website – <http://www.fla.dot.gov/documents/fta-title_VI-final.pdf,.You> can also go to google.com and type in the words Title VI and it will give you various options. In the case that a member of the public should wish to file a discrimination complaint against the grantee, the above sites could also be used. A member should contact first his/her transportation provider (QTI), the recipient (TRRC), or your state and /or local government. Contact information is listed on the Public Rights posted notice of Title VI. The Public Rights Notice is posted at your local Library, City Hall, and any government official office.

## 3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of TRRC obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas, such as the above listing, and of TRRC office(s) including the reception desk and meeting rooms, and on the TRRC website at hppt://ww.threeriversrc.com. Additionally, TRRC will post the notice at stations, stops and on transit vehicles.

# Title VI Procedures and Compliance

## Complaint Procedure

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

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

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

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

The complaint procedure will be made available to the public on the TRRC website (www.threeriversrc.com).

## Complaint Form

A copy of the complaint form in English is provided in Appendix E and on the TRRC website.

## Record Retention and Reporting Policy

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

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

## Sub-recipient Assistance and Monitoring

TRRC has one sub-recipient listed below. TRRC is required by FTA to ensure that sub-recipients of federal funds comply with all Title VI requirements. To meet this mandate, TRRC monitoring consists of collecting data through site visits, day to day technical assistance, and report/forms. TRRC uses reports and site visits to determine if sub-recipients are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan.

List of TRRC Sub-Recipients

→ Quality Trans Inc.

142, North Second Street, STE D

Cochran, Ga. 31014

## Sub recipients and Subcontractors

TRRC is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. TRRC, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

### Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration,* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration,* as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, TRRC shall impose contract sanctions as appropriate, including, but not limited to:
   1. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
   2. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as TRRC, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

**Disadvantaged Business Enterprise (DBE) Policy**

As a condition of your agreement with GDOT, TRRC and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. TRRC, and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a condition of your agreement with GDOT, vendors and contractors of TRRC shall utilize the U.S. Department of Homeland Security’s E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with TRRC. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for TRRC shall likewise utilize the U.S. Department of Homeland Security’s E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for TRRC.

# Title VI Investigations, Complaints, and Lawsuits

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

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

**Table 1: Summary of Investigations, Lawsuits, and Complaints**

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

# Public Participation Plan

The Public Participation Plan (PPP) for TRRC was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for TRRC. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about TRRC services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

### Current Outreach Efforts

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

* [Activity 1] – Planned Public Meeting at City Hall scheduled for 1/9/2015

[Activity 2] – Planned Public Meeting at TRRC scheduled for 4/11/2015

# Language Assistance Plan

TRRC operates a transit system within five (5) Counties, which include Butts, Lamar, Pike, Spalding and Upson counties. The Language Assistance Plan (LAP) has been prepared to address TRRC responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In TRRC service area a list of the resident’s percentages of who describe themselves as not able to communicate in English very well (listed on chart below). TRRC is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. TRRC has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 1: Number of Individuals Identifying as Speaking Another Language Other Than English in the Three Regional Commission Region** | | | | | | | | |
|  | **Spanish** | **English less than "very well" percentage** | **Other Indo - European** | **English less than "very well" percentage** | **Asian/Pacific Islander languages** | **English less than "very well" percentage** | **Other languages** | **English less than "very well" percentage** |
| **Butts County** | **534** | **1.00%** | **89** | **0.00%** | **45** | **0.10%** | **22** | **0.00%** |
| **Lamar County** | **309** | **0.80%** | **17** | **0.00%** | **34** | **0.10%** | **0** | **0.00%** |
| **Meriwether County** | **267** | **0.50%** | **82** | **0.20%** | **41** | **0.10%** | **21** | **0.00%** |
| **Pike County** | **168** | **0.10%** | **50** | **0.00%** | **17** | **0.00%** | **0** | **0.00%** |
| **Spalding County** | **1,959** | **1.70%** | **475** | **0.20%** | **238** | **0.40%** | **238** | **0.00%** |
| **Upson County** | **355** | **0.90%** | **101** | **0.30%** | **127** | **0.00%** | **0** | **0.00%** |

# Transit Planning and Advisory Bodies

TRRC has an advisory Council that has thirty five (35) members that are appointed by the Georgia State Law that governs Regional Commissions.

TRRC will make efforts to encourage minority participation on the committee. These efforts are made by distributing information about the particpation on the committee at public meetings and throughout the transit system. TRRC will utilize the minority population demographic maps included in Appendix I in order to focus on the areas in which the committee participation information is distributed.

# Title VI Equity Analysis

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

TRRC will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. TRRC will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

1. When evaluating locations of facilities, TRRC will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
2. If TRRC determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, TRRC may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. TRRC must demonstrate and document how both tests are met. TRRC will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

TRRC has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, TRRC does not have any Title VI Equity Analysis reports to submit with this Plan. Your Transit System will utilize the demographic maps included in Appendix I for future Title VI analysis.]

# System-Wide Service Standards and Service Policies

TRRC is not a fixed route service provider.

## Service Standards

FTA requires that all transit providers develop quantitative standards for all route modes of operation for the following indicators.

1. Vehicle’s for 5 counties (Butts, Lamar, Pike, Spalding, Upson)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| GDOT Fleet Number |  | VIN | Type | Year | Make | Seats | WC Lift | Tag |
| 2885 | BUTTS | 1FDEE35S09DA90805 | Mini Bus | 2010 | Elkhart | 11 | Y | GV94189 |
| 3313 | LAMAR | 1FDEE3FS1CDA82525 | Mini Bus | 2013 | Elkhart | 14 | N | GV4140D |
| 2741 | LAMAR | 1FD3E35S08DA54795 | Mini Bus | 2007 | Elkhart | 11 | Y | GV42908 |
| 2886 | PIKE | 1FDEE35S69DA59624 | Shuttle Bus | 2009 | Elkhart | 11 | Y | GV43093 |
| 2887 | UPSON | 1FDEE35S39DA88577 | Mini Bus | 2010 | Elkhart | 14 | N | GV1305A |
| 2888 | UPSON | 1FDEE35S69DA88573 | Mini Bus | 2010 | Elkhart | 14 | N | GV13D6A |
| 2889 | UPSON | 1FDFE45S19DA52820 | Mini Bus | 2009 | Elkhart | 17 | Y | GV1298A |
| 3314 | UPSON | 1FDEE3FS9DDA02986 | Mini Bus | 2013 | Elkhart | 13 | N | GV0036D |
| 3065 | SPALDING | 1FDEE3FS4ADB01596 | Mini Bus | 2010 | Ford | 11 | Y | GV0330B |
| 3066 | SPALDING | 1FDEE3FS6ADB01597 | Mini Bus | 2010 | Ford | 11 | Y | GV1484B |
| 3067 | SPALDING | 1FDEE3FS8ADB01598 | Mini Bus | 2010 | Ford | 14 | N | GV0329B |
| 3068 | SPALDING | 1FDEE3FSXADB01599 | Mini Bus | 2010 | Ford | 14 | N | GV0328B |
| 3069 | SPALDING | 1FDEE3FS2ADB01600 | Mini Bus | 2010 | Ford | 14 | N | GV1483B |

1. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) hour early and… no more than ten (10) minutes late. TRRC continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

1. Service Availability

TRRC will distribute transit service so that 100% of all residents in the service area have the opportunity to obtain ridership if at all possible. Provided the time, place and date of the appointment coincides with availability.

## Service Policies

TRRC will comply fully with all administrative and other requirements established by applicable federal and state laws, rules and regulations, and assumes responsibility for full compliance with all such laws, rules and regulations. It is further understood and agreed that TRRC is a “covered entity” as defined by HIPPA of 1996 and the federal “Standards for Privacy of Individually Health Information” promulgated there under at 45 CFR parts 160 and 164. TRRC will comply with O.C.G.A. sec. 13-10-90 et seq. regarding security and immigration compliance. TRRC agrees to comply with federal and state laws, rules and regulations relative to nondiscrimination in consumer/customer/client service practices on the basis of political affiliation, religion, race, color, sex, handicap, age, creed, veteran status, and/or national origin. TRRC agrees to comply with all applicable provisions of the American with Disabilities Act (ADA) and any relevant federal and state laws, rules and regulations regarding practices toward individuals with disabilities and the availability of programs, activities, or service for the public with disabilities.

# Appendices

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**Appendix A**

**FTA Circular 4702.1B Reporting Requirements for Transit Providers**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements**

*All recipients must submit:*

* Title VI Notice to the Public, including a list of locations where the notice is posted
* Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
* Title VI Complaint Form
* List of transit-related Title VI investigations, complaints, and lawsuits
* Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
* Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
* A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
* Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
* **A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
* A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
* Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)
* Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

**Appendix B**

**Current System Description**

**Current System Description**

1. An overview of the organization including its mission, program goals and objectives.

TRRC current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

1. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

TRRC is a unit of local government organization. Our organization is made up of 52 full-time employees, 1 part-time employee. Our Executive Director is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County’s Public Transportation Program. Transportation services are provided in accordance with the BCC’s approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2011 Transit Development Plan (page 201) and 2012 Operations Handbook (page 34). We will continue to operate at previous year (2011) service hours averaging 84 total fleet service hours per day or approximately 25,200 annual service hours (assuming 300 operating days).

1. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to the public. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Of these trip purposes approximately 9% are medical, 2% educational, 31% nutrition, 5% social, 2% personal, and 53% employment. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes 11 buses, 7 of which are equipped for wheelchair services. We prioritize grouping trips and multi-loading to the maximum extent possible. We make approximately 5,400 passenger trips per month and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

**Appendix C**

**Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter**

To be provided at a later date

**Appendix D**

**Title VI Sample Notice to Public**

**Notifying the Public of Rights Under Title VI**

**THREE RIVERS REGIONAL COMMISSION(TRRC)**

* TRRC operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with TRRC.
* For more information on TRRC civil rights program, and the procedures to file a complaint, contact 678-692-0510, or send an email to [www.threeriversrc.com](http://www.threeriversrc.com). You may also send a letter to our administrative office at 120 North Hill Street Griffin, Ga. 30224 or P.O. Box818 Griffin, Ga. 30224.
* If information is needed in another language, contact 678-692-0510
* You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR  
  1200 New Jersey Ave., SE, Washington, DC 20590

**Appendix E**

**Title VI Complaint Form**

**THREE RIVERS REGIONAL COMMISSION**

Title VI Complaint Form

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

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

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

Signature and date required below

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

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

Mamie Tomys

Three Rivers Regional Commission

678-692-0510

Mtomysthreeriversrc.com

**Appendix F**

**Public Participation Plan (PPP)**

Introduction

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

Public Participation Goals

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

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

Public Participation Methods

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

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

The public will be invited to provide feedback on the TRRC website (www.threeriversrc.com) and all feedback on the site will be recorded and passed on to Your Transit System management. The public will also be able to call the TRRC office at 678-692-0510 during its hours of operation. Feedback collected over the phone will be recorded and passed on to TRRC management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

* In-vehicle advertisement
* Posters or flyers in transit center
* Posting information on website
* Press releases and briefings to media outlets
* Multilingual flyer distribution to community based organizations, particularly those that target LEP population
* Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
* Communications to relevant elected officials
* Other methods required by local or state laws or agreements

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

Public Hearing

TRRC is not required to perform public hearings, however TRRC provides public information regarding changes, events, performances, activities, and/or any other federal or state regulated dicission, and the public can request a public hearing.

No public hearings have been requested at this time.

LCB Meetings

TRRC conducts board meetings every other month to discuss policies, RFP’s, contracts, etc…

**Appendix G**

**Language Assistance Plan (LAP)**

1. **Introduction**

TRRC operates a transit system within a five county service area. The Language Assistance Plan (LAP) has been prepared to address TRRC responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In TRRC is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. TRRC has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

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

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

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

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

* Identification: Identifying LEP populations in service areas
* Notification: Providing notice to LEP individuals about their right to language services
* Interpretation: Offering timely interpretation to LEP individuals upon request
* Translation: Providing timely translation of important documents
* Staffing: Identifying TRRC staff to assist LEP customers

1. **Four Factor Analysis**

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

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a TRRC program, activity or service.

2. The frequency with which LEP persons come in contact with TRRC programs, activities or services.

3. The nature and importance of programs, activities or services provided by TRRC to the LEP population.

4. The resources available to TRRC and overall costs to provide LEP assistance

* 1. **Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 149,511 residents in the TRRC service area 47.3% residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize TRRC services. For the TRRC service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 20.9% speak English “very well”. For groups who speak English “less than very well”, 12.3% speak Spanish and 14.1% speak English.

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

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

TRRC has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. Phone inquiries and staff survey feedback indicated that TRRC dispatchers and drivers interact infrequently with LEP persons.

* 1. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives**

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s *Policy Guidance Concerning Recipient’s Responsibilites to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person’s inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board passenger survey was conducted to collect data on usage of and overall satisfaction rating with transportation. Refer to Charts below:

1. **Language Assistance Plan**

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

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

The five elements are addressed below.

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

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

TRCC has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier,60% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (40%).

TRRC may identify language assistance need for an LEP group by:

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

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

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

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

* 1. **Element 3: Training Staff**

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

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

In the case of TRRC, the most important staff training is for Customer Service Representatives and transit drivers.

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint
   1. **Element 4: Providing Note to LEP Persons**

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

* 1. **Element 5: Monitoring and Updating the Plan**

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

* The number of documented LEP person contacts encountered annually
* How the needs of LEP persons have been addressed
* Determination of the current LEP population in the service area
* Determination as to whether the need for translation services has changed
* Determine whether TRRC financial resources are sufficient to fund language assistance resources needed

TRRC understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. TRRC is open to suggestions from all sources, including customers, TRRC staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

1. **Safe Harbor Provision**

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

TRRC service area does not have LEP populations which qualify for the Safe Harbor Provision.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. TRRC may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

**Appendix H**

**Operating Area Language Data: Three Rivers Regional Service Area**

Factor I: The number or proportion of Limited English Proficient individuals eligible to be served or likely to be encountered by the programs, services, or activities offered by Three Rivers Regional Commission.

Demographic data on the number of LEP individuals in the Three Rivers Regional Commission region was gathered and evaluated to determine the potential number of individuals who were likely to be served or likely to be encountered in connection with the region’s 5311 Public Transit Programs.

Factor II: The frequency with which LEP individuals come in contact with these programs, services, or activities.

According to the Census data used, Spanish is identified as the most commonly spoken foreign language in the region. The size of the foreign language population is likely to increase. As a result, the likelihood of the transit provider encountering someone needing specialized language services will also increase. However, to date, very little requests for transport from individuals with very limited English skills have been made to any of the local transit providers. It is difficult to determine if this lack of contact is due to inadequate community outreach about public transportation in limited English areas by Three Rivers Regional Commission and its member governments, a lack of transportation need among limited English speaking individuals, or due to the low reporting numbers.

However, as the transit program continues and expands across the region, any requests for language assistance will be monitored and used to identify any potential trends and increases in service needs. In addition, as more detailed data is received by the organization, adjustments to the implementation of this plan will be made.

Factor III: The importance of the program, service, or activity to LEP individuals lives.

As noted previously in this document, the rural transit programs in the region are funded by the Federal Transit Administration’s 5311 Rural Transportation Grant. This service is provided on a demand response system and handles non – vital medical appointments and non – vital basic needs services. However, the service does not provide immediate or emergency assistance. Furthermore, the rural transportation system does not require applications or interviews prior to participation in this program. Participation by citizens is strictly voluntary. Hence, the need to communicate directly with LEP individuals without the use of an interpreter is extremely low.

However, transit systems within the Three Rivers Regional Commission region must ensure that all segments of the population, including Limited English Proficiency individuals, have an equal opportunity to participate and use the rural transit system as primary English speaking individuals. Limited English skills may hinder the mobility of individuals by increasing their difficulty with obtaining a driver’s license.

Factor IV: The resources available and the overall cost to the region to implement the program.

Given the size of the Limited English Proficiency population in the Three Rivers Regional Commission region, as previously identified, full language translation of all transit documents is not warranted or cost feasible at this time. However, the TRRC will evaluate the cost feasibility of translating key summary sheets, brochures, and website information into Spanish.

An analysis of the region has not yielded any local Spanish civic organizations or Spanish translation services. The closest Spanish translation service is located over 50 miles away in Atlanta, GA. Due to a lack of contact with Limited English individuals, foreign language training for transit staff would not be a cost effective measure at this time.

The TRRC will continue to identify any existing Spanish outreach materials from community organizations and from federal, state, and local transportation agencies that can be effectively used as outreach tools within the community. The TRRC will also seek to establish working relationships identify and collaborate with state and local agencies and educational facilities that provide language translation and interpretation services. Once identified, an informational contact sheet will be prepared and posted on the website. This information will also be incorporated into a Spanish version of the current transit brochures.

Conclusion

The Three Rivers Regional Commission staff will take reasonable steps to provide the opportunity for meaningful access to Limited English Proficient individuals who have difficulty communicating with staff. All reasonable care will be exercised to provide accommodations and care will be exercised to assist LEP individuals and prevent civil right violations within the program.

As visibility for the transit program increase and/or census data is released showing a possible increase in need, TRRC will monitor, evaluate, and determine if changes to this plan and LEP services are needed.

**Appendix I**

**Demographic Maps**

**Appendix J**

**Title VI Equity Analysis**

**Title VI Equity Analysis for five county Facility**

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.”TRRC completed a Title VI equity analysis for five county facilities during the planning stage to ensure that the location is selected without regard to race, color, or national origin.

**Purpose and need for the facility:**

N/A at this time

**Service area population characteristics:**

The 2013 Census defined the following population characteristics for the TRRC service area:

* ***Butts Co****.*
* White – 70.0%
* Black – 27.9%
* Hispanic – 3.0%
* **Lamar Co**.
* White – 66.4%
* Black – 31.2%

Hispanic – 2.1%

* **Pike Co.**
* White – 87.1%
* Black – 10.7%

Hispanic – 1.3%

* **Spalding Co.**
* White – 63.5%
* Black – 33.3%

Hispanic – 4.2%

* **Upson Co.**
* White – 69.7%
* Black – 27.8%

Hispanic – 2.5%

**Alternative locations considered:**

**Not Applicable – TRRC will not be building alternative Locations**

**Equity impacts of sitting alternatives:**

No Action Alternative

**Appendix K**

**Text Formatting Palette**

**Formatting/Styles**

Report margins:

Top margin = 1”

Bottom margin = 1”

Left margin = 1.25”

Right margin = .75”

Heading levels:

#### ****Heading One****

Calibri 14 pt bold; left-aligned; paragraph spacing = 10 pt after; line spacing multiple 1.15

##### Heading 2

Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

Body Text: Calibri 11; fully-justified text; line spacing-multiple 1.15; 10 pt. after.

* Bulleted List: Calibri 10 pt; line spacing-multiple 1.15; paragraph spacing = 10 pt after

**General Instructions**

How to Update Table of Contents:

Right click on table of contents and choose ***update field***—you will then have the option of updating the entire table of contents or just the page numbers.

How to Add New Section:

Under ***Page Layout Menu***, choose ***Breaks***, then ***Section Break,*** then ***Next Page***. Heading numbers should update automatically in new section.