

Southern Georgia Regional Commission Transit



Title VI Plan

Date Adopted: August 26, 2021



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person	Remarks
3/12/21	Concurrence Letter received from GDOT	Megan Fowler	
3/25/21	Initial Adoption	Megan Fowler	
8/26/21	Re-adopt (to incorporate changes as requested by RLS Associates)	Megan Fowler	
8/23/21	Concurrence Letter received from GDOT (for re-adoption)	Megan Fowler	
12/16/21	Added Meeting Minutes from 8/26/21 SGRC Council Meeting	Megan Fowler	

Title VI Plan Activity Log (Continued)

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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Southern Georgia Regional Commission (SGRC) Transit assures the Georgia Department of Transportation that no person shall on the basis of race, color, and national origin 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.

SGRC Transit 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 SGRC Transit.
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: _____

Lisa Cribb

Printed Name: Lisa Cribb

Executive Director, SGRC, Date: December 16, 20 21

2.0 Introduction & Description of Services

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

SGRC Transit 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.

SGRC Transit is a sub-recipient of FTA funds and provides service in Atkinson, Bacon, Ben Hill, Berrien, Brantley, Brooks, Charlton, Clinch, Coffee, Cook, Echols, Irwin, Lanier, Lowndes, Pierce, Tift, Turner, Ware Counties (Note: rural public transit services (5311) is currently not provided in Ben Hill, Lanier, Echols or Clinch Counties, however the SGRC does provide services in these counties through the GA Department of Human Services Coordinated Transit and other programs). A description of the current SGRC Transit system is included in Appendix B.

Title VI Liaison

Corey Hull, Transportation Director
Southern Georgia Regional Commission
229-333-5277
1937 Carlton Adams Dr., Valdosta, GA 31601

Alternate Title VI Contact

Megan Fowler, Regional Transit Program Manager
Southern Georgia Regional Commission
229-333-5277
1937 Carlton Adams Dr., Valdosta, GA 31601

SGRC Transit must designate a liaison for Title VI issues and complaints within the organization. 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.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

SGRC Transit is not a first time applicant for FTA/GDOT funding.

2.2 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.

SGRC Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on 3/12/21. The Plan was approved and adopted by SGRC Transit's Board of Directors during a meeting held on March 25, 2021. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

The notice is included here and in Appendix D of this Plan along with other language translations.

Notifying the Public of Rights Under Title VI

Southern Georgia Regional Commission Transit

- Southern Georgia Regional Commission (SGRC) Transit 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 SGRC Transit.
- For more information on SGRC Transit's civil rights program, and the procedures to file a complaint, contact 229-333-5277, (TTY: 1-800-255-0056); email mfowler@sgrc.us; or visit our administrative office at 1937 Carlton Adams Dr. Valdosta, GA 31601. For more information, visit www.sgrc.us.
- If information is needed in another language, contact 229-333-5277.
- Spanish
- 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

Notificación al público de los derechos en virtud del título VI

SUR Georgia Regional Comisión de Tránsito

- SUR Georgia Regional Comisión (SGRC) Transit opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante SGRC Transit.
- Para obtener más información sobre el programa de derechos civiles de SGRC Transit y los procedimientos para presentar una queja, comuníquese al 229-333-5277 (TTY: 1-800-255-0056); correo electrónico mfowler@sgrc.us; o visite nuestra oficina administrativa en 1937 Carlton Adams Dr. Valdosta, GA 31601. Para obtener más información, visite www.sgrc.us.
- Si necesita información en otro idioma, llame al 229-333-5277.
- Español
- También puede presentar su queja directamente ante la FTA en: Oficina de Derechos Civiles de la Administración Federal de Tránsito Atención: Coordinador del Programa Título VI, Edificio Este, 5to Piso - TCR 1200 New Jersey Ave., SE, Washington, DC 20590

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of SGRC Transit's 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 of SGRC Transit's office(s) including the reception desk and meeting rooms, and on the SGRC Transit's website at <https://www.sgrc.us/transportation>. Additionally, SGRC Transit will post the notice at stations, stops and on transit vehicles.

This notice is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

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

Once the complaint is received, SGRC Transit 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.

SGRC Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, SGRC Transit 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, SGRC Transit 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 SGRC Transit's website <https://www.sgrc.us/transportation.html>.

4.2 Complaint Form

A copy of the complaint form in English and other languages is provided in Appendix E and on SGRC Transit's website www.sgrc.us.

4.3 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. SGRC Transit will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

4.4 Sub-recipient Assistance and Monitoring

SGRC Transit does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, SGRC Transit utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if SGRC Transit has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Sub recipients and Subcontractors

SGRC Transit 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. SGRC Transit, 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, and national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations 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, and national origin.

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *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, SGRC Transit shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including 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 the SGRC Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), SGRC Transit 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 SGRC Transit 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].

SGRC Transit has had 0 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 these 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	None			
1.				
2.				
Lawsuits	None			
1.				
2.				
Complaints	None			
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for SGRC Transit 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 SGRC Transit. 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 SGRC Transit 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

SGRC Transit 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 SGRC Transit's recent, current, and planned outreach activities.

- DHS Coordinated Transit RTCC meetings and other outreach to disadvantaged stakeholder groups.
- SGRC Regional Transit Development Plan public survey.
- Expand distribution of agency brochures
- Public announcements via newspapers, fliers or radio
- Hosted information booth at community event (Goodwill event: FOCUS ON HEALTH -Drive -Through Employment & Community Resources Fair - June 29 | 11am - 2:00pm)

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

SGRC Transit operates a transit system within Southeastern Georgia. The Language Assistance Plan (LAP) has been prepared to address SGRC Transit's 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 SGRC Transit service area there are 11,208 residents or 3% who describe themselves as not able to communicate in English very well (Source: US Census, 2015 American Community Survey). SGRC Transit 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. SGRC Transit 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.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

SGRC Transit does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the 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.” 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, SGRC Transit will ensure the following:

1. SGRC Transit 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. SGRC Transit 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.
2. When evaluating locations of facilities, SGRC Transit 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.
3. If SGRC Transit determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, SGRC Transit 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. SGRC Transit must demonstrate and document how both tests are met. SGRC Transit 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.

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

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

SGRC Transit is not a fixed route service provider.

11.0 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)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- ☐ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- ☐ Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.
SGRC Transit's 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 residents.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.
The Southern Georgia Regional Commission is a regional governmental organization. Our organization is made up of more than 65 full-time employees. The SGRC Transit Department includes at least two FTE (full time equivalent) employees focused on delivering quality transit services to the region. Our Executive Director is responsible for all of the day-to-day operations of our organization and reports directly to our Council. Our Council is committed to this program and has, therefore, incorporated our service within the SGRC's Public Transportation Program. We plan to operate at about 30 vehicles throughout the region.
3. Indicate if your agency is a government authority.
The Southern Georgia Regional Commission is a regional governmental organization created by the O.C.G.A. 50-8-32.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?
SGRC Transit's manager is responsible for oversight and management of our transportation program which is carried out through the services of a third party operator (TPO). The TPO is responsible for ensuring that a vehicles are insured to minimum requirements, training all employees, and daily management and delivery of transit services in the region.
5. Who provides vehicle maintenance and record keeping?
Maintenance on all agency vehicles is provided by the TPO. The TPO employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at the TPO operations base located at 1610 River St, Valdosta, GA 31601 and are maintained by the Transportation Manager. All records are maintained and retained for a minimum of four (4) years.
6. Number of current transportation related employees
The SGRC Transit Department includes at least two FTE (full time equivalent) employees focused on delivering quality transit services to the region.
7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?
Only TPO employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles.

8. A detailed description of service routes and ridership numbers

SGRC Transit provide door-to-door transit services to businesses, commercial and activity centers in the SGRC areas and is funded with federal, state, and local dollars. Most Public and non-DHS POS (Purchase of Service) trips will be scheduled by calling a toll-free number (to be provided by the TPO) at least 24-hours in advance for the next service day, dependent upon availability. Trips are generally scheduled between the hours of 8am-5pm, however the service shall be operated 24/7 as trips are requested (in support of the DHS requirement to deliver trips 24/7). The SGRC Transit vehicles will come to any address to pick-up or drop-off clients. Public transit trips are allowed to cross county lines and leave the region to meet the needs of the clients, provided that the trips outside the region do not monopolize transit vehicles for a single client or that they put the driver's and passenger's safety at risk due to long driving hours (DHS trips may cross county lines, but are required to remain within the 18-county region).

The SGRC transit service uses a 'demand response' model, meaning that there are no fixed routes, stops, or pick-up times. Reservations for next day service must be scheduled in advance by 12 noon or earlier (trips ordered after this time are required to be provided if they do not alter the pre-determined daily trip manifest/route. Daily routes are generated based on the destinations requested. Trips are 'first come-first served' dependent upon availability. Peak times are expected to be between 8-10am and 2-5pm and conversely, more capacity is available during off-peak times, 10am-2pm. Transit service is required to be provided 24/7 (excluding SGRC observed holidays) to aid in providing trips to meet DHS requirements and to serve the public needs, however the majority of trips will occur between 8am-5pm Monday-Friday. The proposed transit service is designed and available for anyone who needs transportation within the SGRC service area.

As a start-up service we estimate that more than 100,000 trips will be taken on the transit system in future years.

Appendix C

Title VI Plan Adoption Meeting Minutes

Via E-mail transmission

**SOUTHERN GEORGIA REGIONAL COMMISSION
EXECUTIVE COMMITTEE MEETING
MINUTES**

**SPORTS COMPLEX & CIVIC CENTER • 786 AUSTIN AVE., E. • PEARSON, GA 31642
AUGUST 26, 2021
11:00 A.M.**

Members in Attendance:

Bennett, Neal
Evans, Joyce
Gowen, Lee
King, Barbara
Maefield, Barbara
Stone, Keith

Staff Present:

Cribb, Lisa
Dorsey, Rex
Fowler, Megan
Strom, Chris
Vining, Kim

CALL TO ORDER AND WELCOME: Chair Joyce Evans called the meeting to order and welcomed Executive Committee members, staff and guests.

REVIEW AND APPROVAL OF MINUTES OF JUNE 24, 2021 EXECUTIVE COMMITTEE MEETING: Chair Evans reminded those present that the minutes of the June 24, 2021 Executive Committee meeting were emailed to members for their review (copy attached and made a part of these minutes). Neal Bennett made a motion to accept the minutes, and Barbara Maefield seconded the motion. Motion carried unanimously.

REVIEW AND APPROVAL OF MINUTES OF JUNE 24, 2021 COUNCIL MEETING: Chair Evans reminded those present that the minutes of the June 24, 2021 Council meeting were emailed to members for their review (copy attached and made a part of these minutes). Barbara Maefield made a motion to accept the minutes, and Neal Bennett seconded the motion. Motion carried unanimously.

REVIEW AND ACCEPTANCE OF JUNE 2021 REVENUE AND EXPENDITURE REPORT: Chair Evans reminded those present that a copy of the June 2021 Revenue and Expenditure Report had been emailed to members (copy attached and made a part of these minutes). Barbara King made a motion to accept the June 2021 Revenue and Expenditure Report. Barbara Maefield seconded the motion. Motion carried unanimously.

RESOLUTION TO ADOPT SGRC PUBLIC TRANSIT TITLE VI COMPLIANCE PLAN: Chair Evans called upon SGRC Transit Mobility Coordinator Megan Fowler to present the Resolution to Adopt SGRC Public Transit Title VI Compliance Plan to the executive committee. Ms. Fowler referred committee members to a copy of the resolution in their meeting packets (copy attached and made a part of these minutes). She informed executive committee members that the SGRC council adopted the Public Transit VI Plan in March 2021, and the resolution presented today is to adopt an updated version. She reminded those present that the Public Transit Title VI Plan is a nondiscrimination policy to ensure that all passengers are treated equally and fairly. The plan will protect individuals from discrimination based on race, color, and national origin. Ms. Fowler asked for questions from those present. There being none, Chair Evans called for a motion. Lee Gowen made a motion to adopt the SGRC Transit Title VI Compliance Plan Resolution. Barbara King seconded the motion. Motion carried unanimously.

SGRC Executive Committee
August 26, 2021
Page 2 of 2

LENDING PROGRAM ACTIVITIES: Chair Evans called on SGRC Lending Program Director Rex Dorsey to address the executive committee. Mr. Dorsey referred committee members to the 2021 Loan Program Annual Report in their packets (copy attached and made a part of these minutes). He stated that for the fiscal year that ended June 30, 2021, the loan program closed or approved nine traditional loans totaling \$7,686,060; an additional five loans were packaged and approved but not closed, totaling \$3,984,156. Through the CARES Act, the Lending Department participated in funding 97 Second Round Paycheck Protection Program Loans totaling \$3,450,333. The total volume for FY2021 was \$15,120,549. There were 658 jobs created or retained. Mr. Dorsey also reviewed specifics such as the type & location of the businesses assisted, the types of loans, and the participating banks. Mr. Dorsey then concluded his report by reviewing the lending activities of the Southern Georgia loan program since its inception.

REAPPOINTMENT OF LOAN PROGRAM BOARD MEMBERS: Mr. Dorsey referred those present to a listing of the current Loan Board of Directors included in their member packets (copy attached and made a part of these minutes). He then reviewed the board composition requirements. Mr. Dorsey stated that the loan board recommended the reappointment of the current board members. Lee Gowen made a motion to accept the recommendation of Reappointment of the Loan Program Board Members, and Barbara Maefield seconded the motion. Motion carried unanimously.

REVIEW AND ACCEPTANCE OF THE ANNUAL PERFORMANCE EVALUATION: SGRC Assistant Executive Director Chris Strom shared the Annual Performance Evaluation results with the executive committee. He reminded committee members that the evaluation was emailed and that all council members were asked to participate. Mr. Strom directed the committee to a copy of the results from the performance evaluation located in their packets (copy attached and made part of these minutes). The results were separated to show two sets of responses; the council members' responses and the city/county managers' responses. Mr. Strom stated that 28 council members and nine city/county managers had completed the survey. Overall a positive response was given for the Regional Commission and the Executive Director. Mr. Strom asked if there were any questions. There being none, Barbara King made a motion to accept the Annual Performance Evaluation Results, and Keith Stone seconded the motion. Motion carried unanimously.

ADJOURN: With there being no other business, the meeting was adjourned.


Joyce Evans, Chair


Matt Scale, Secretary

**RESOLUTION BY
THE COUNCIL OF THE
SOUTHERN GEORGIA REGIONAL COMMISSION
TO Adopt the Title VI Compliance Plan for Southern Georgia Regional Commission Transit**

WHEREAS, the Southern Georgia Regional Commission is a recipient of federal funding and as required in accordance 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 and other related statutes, Executive Orders and regulations to develop a Title VI Compliance Plan and Limited-English Proficiency Plan; and

WHEREAS, the Southern Georgia Regional Commission SGRC Transit is a sub-recipient of FTA funds and provides service in Atkinson, Bacon, Ben Hill, Berrien, Brantley, Brooks, Charlton, Clinch, Coffee, Cook, Echols, Irwin, Lanier, Lowndes, Pierce, Tift, Turner, Ware Counties; and

WHEREAS, the Southern Georgia Regional Commission agrees to the responsibilities with respect to its programs and activities as identified in Section 1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan;

WHEREAS, the Southern Georgia Regional Commission's Council adopted this Title VI Plan including a Limited-English Proficiency Plan as required by FTA Circular 4702.1B, Chapter III, Paragraph 9, and other related statutes, Executive Orders and regulations on March 25, 2021.

NOW, THEREFORE BE IT RESOLVED, the Southern Georgia Regional Commission's Council re-adopts this Title VI Plan in accordance with the revisions that were required by the Georgia Department of Transportation.

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution adopted by the Southern Georgia Regional Commission Council at a meeting held on August 26, 2021.

Passed this 26th day of August, 2021.

[Signature]
Board Chairman

Signed, sealed and delivered this 26th day of August, 2021
in the presence of:

[Signature]
Witness

[Signature]
Notary Public - Notary Seal



Appendix D

Title VI Notice to Public

Notifying the Public of Rights Under Title VI

Southern Georgia Regional Commission Transit

- Southern Georgia Regional Commission (SGRC) Transit 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 SGRC Transit.
- For more information on SGRC Transit's civil rights program, and the procedures to file a complaint, contact 229-333-5277, (TTY: 1-800-255-0056); email mfowler@sgrc.us; or visit our administrative office at 1937 Carlton Adams Dr. Valdosta, GA 31601. For more information, visit www.sgrc.us.
- If information is needed in another language, contact 229-333-5277.
- Si necesita información en otro idioma, llame al 229-333-5277.
- 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

Notificación al público de los derechos en virtud del título VI

Sur Georgia Regional Comisión de Tránsito

- Sur Georgia Regional Comisión (SGRC) Transit opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante SGRC Transit.
- Para obtener más información sobre el programa de derechos civiles de SGRC Transit y los procedimientos para presentar una queja, comuníquese al 229-333-5277 (TTY: 1-800-255-0056); correo electrónico mfowler@sgrc.us; o visite nuestra oficina administrativa en 1937 Carlton Adams Dr. Valdosta, GA 31601. Para obtener más información, visite www.sgrc.us.
- Si necesita información en otro idioma, llame al 229-333-5277.
- También puede presentar su queja directamente ante la FTA en: Oficina de Derechos Civiles de la Administración Federal de Tránsito Atención: Coordinador del Programa Título VI, Edificio Este, 5to Piso – TCR 1200 New Jersey Ave., SE, Washington, DC 20590

Appendix E

Title VI Complaint Form

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	None			
1.				
2.				
Lawsuits	None			
1.				
2.				
Complaints	None			
1.				
2.				

SGRC Transit

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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any 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 Court _____

☐ State Agency _____

☐ 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:

SGRC Transit Title VI Liaison
1937 Carlton Adams Dr.
Valdosta, GA 31601

Tránsito SGRC

Formulario de quejas del Título VI

Sección I:				
Nombre:				
Dirección:				
Teléfono (Casa):			Teléfono (trabajo):	
Dirección de correo electrónico:				
¿Requisitos de formato accesible?	Letra grande		Cinta de audio	
	TDD		Otro	
Sección II:				
¿Está presentando esta queja en su propio nombre?			Sí*	No
* Si respondió "sí" a esta pregunta, pase a la Sección III.				
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja:				
Explique por qué ha presentado una solicitud a nombre de un tercero:				
Confirme que ha obtenido el permiso de la parte agraviada si presenta la solicitud en nombre de un tercero.			sí	No
Sección III:				
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional				
Fecha de la presunta discriminación (mes, día, año): _____				
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa todas las personas involucradas. Incluya el nombre y la información de contacto de la (s) persona (s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el reverso de este formulario.				

Sección IV				
¿Ha presentado anteriormente una queja de Título VI con esta agencia?			sí	No

Sección V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?

☐ Sí ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal: _____

☐ Tribunal Federal ☐ Agencia estatal _____

☐ Tribunal estatal ☐ Agencia local _____

Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

Sección VI

Nombre de la agencia que presenta la queja contra:

Persona de contacto:

Título:

Número de teléfono:

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

Firma y fecha requerida a continuación

Firma

Fecha

Envíe este formulario en persona a la dirección que aparece a continuación, o envíe este formulario a:

Enlace de SGRC Transit Título VI
1937 Carlton Adams Dr.
Valdosta, GA 31601

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for SGRC Transit 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 SGRC Transit. 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 SGRC Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. SGRC Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, and 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 SGRC Transit and its operations. The goals for this PPP include:

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

SGRC Transit 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 SGRC Transit website (www.sgrc.us) and all feedback on the site will be recorded and passed on to SGRC Transit management. The public will also be able to call the SGRC Transit office at 229-333-5277 during its hours of operation. Feedback collected over the phone will be recorded and passed on to SGRC Transit 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, SGRC Transit 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.

Local Coordinating Board (transportation disadvantaged) Meetings

SGRC Transit will participate in the GA DHS RTCC meetings, and other outreach to transportation disadvantaged stakeholder groups.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

SGRC Transit operates a transit system within Atkinson, Bacon, Ben Hill, Berrien, Brantley, Brooks, Charlton, Clinch, Coffee, Cook, Echols, Irwin, Lanier, Lowndes, Pierce, Tift, Turner, Ware Counties (Note: rural public transit services (5311) is currently not provided in Ben Hill, Lanier, Echols or Clinch Counties, however the SGRC does provide services in these counties through the GA Department of Human Services Coordinated Transit and other programs). A description of the current SGRC Transit system is included in Appendix B. The Language Assistance Plan (LAP) has been prepared to address SGRC Transit's 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 SGRC Transit service area there are 11,208 residents or 3% who describe themselves as not able to communicate in English "very well" (Source: US Census, 2015 American Community Survey). SGRC Transit 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. SGRC Transit 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 SGRC Transit be able to communicate effectively with all of its riders. When SGRC Transit 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. SGRC Transit 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 SGRC Transit 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 SGRC Transit staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use SGRC Transit 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 SGRC Transit program, activity or service.
2. The frequency with which LEP persons come in contact with SGRC Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by SGRC Transit to the LEP population.
4. The resources available to SGRC Transit and overall costs to provide LEP assistance

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

Of the 382,631 residents in the SGRC Transit service area 11,208 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize SGRC Transit services. For the SGRC Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 92.8% speak English “very well”. For groups who speak English “less than very well”, 2.32% speak Spanish.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the SGRC Transit service area.

b. 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.

SGRC Transit 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. As discussed above, Census data indicates that Spanish is the most prominent LEP group. Phone inquiries and staff survey feedback indicated that SGRC Transit dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 2 years, SGRC Transportation Department (as an overarching agency) has had 0 requests for translated documents.

c. 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 Responsibilities 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. Regional transit is provided as a service to riders in the county to access basic, nonemergency public transit services.

d. Factor 4: The Resources Available to the Recipient and Costs

SGRC Transit could provide materials in other languages for the potential riders. It is recommended that potential riders utilize the SGRC website at www.sgrc.us, where a Google Translator can provide for basic information on the service to LEP individuals.

III. 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.

a. 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.

SGRC Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 92.8% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (5.68%). Of those whose primary spoken language is Spanish,

approximately 2.32% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 3% of the service area population.

SGRC Transit 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 SGRC Transit Meetings. This will assist SGRC Transit 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 SGRC Transit 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.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

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

1. Provide bilingual representatives/interpreters at community events, public hearings, and transit committee meetings when requested.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the SGRC Transit offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. 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.

SGRC Transit 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.

c. 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 SGRC Transit, 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

d. Element 4: Providing Note to LEP Persons

SGRC Transit will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in SGRC Transit office lobby and on buses. 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.

e. 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 SGRC Transit's financial resources are sufficient to fund language assistance resources needed

SGRC Transit 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. SGRC Transit is open to suggestions from all sources, including customers, SGRC Transit staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. 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.

SGRC Transit service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" is counted as 2.32% and 8,875 persons.

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. SGRC Transit 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:

SGRC Transit Service Area

<u>Language</u>	<u>Region</u>	<u>Percent of Population</u>
Total	382,631	100%
Speak only English	355,077	92.80%
Spanish or Spanish Creole	21,717	5.68%
Speak English "very well"	12,842	3.36%
Speak English less than "very well"	8,875	2.32%
French (incl. Patois, Cajun)	726	0.19%
Speak English "very well"	575	0.15%
Speak English less than "very well"	151	0.039%
French Creole	165	0.043%
Speak English "very well"	143	0.037%
Speak English less than "very well"	22	0.006%
Italian	36	0.009%
Speak English "very well"	36	0.009%
Speak English less than "very well"	0	0%
Portuguese or Portuguese Creole	5	0.001%
Speak English "very well"	3	0.001%
Speak English less than "very well"	2	0.001%
German	613	0.16%
Speak English "very well"	501	0.13%
Speak English less than "very well"	112	0.029%
Yiddish	28	0.007%
Speak English "very well"	28	0.007%
Speak English less than "very well"	0	0%
Other West Germanic languages	53	0.014%
Speak English "very well"	53	0.014%
Speak English less than "very well"	0	0%
Scandinavian languages	6	0.002%
Speak English "very well"	6	0.002%
Speak English less than "very well"	0	0%
Greek	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Russian	67	0.018%
Speak English "very well"	67	0.018%
Speak English less than "very well"	0	0%
Polish	52	0.014%
Speak English "very well"	48	0.013%
Speak English less than "very well"	4	0.001%
Serbo-Croatian	24	0.006%
Speak English "very well"	24	0.006%

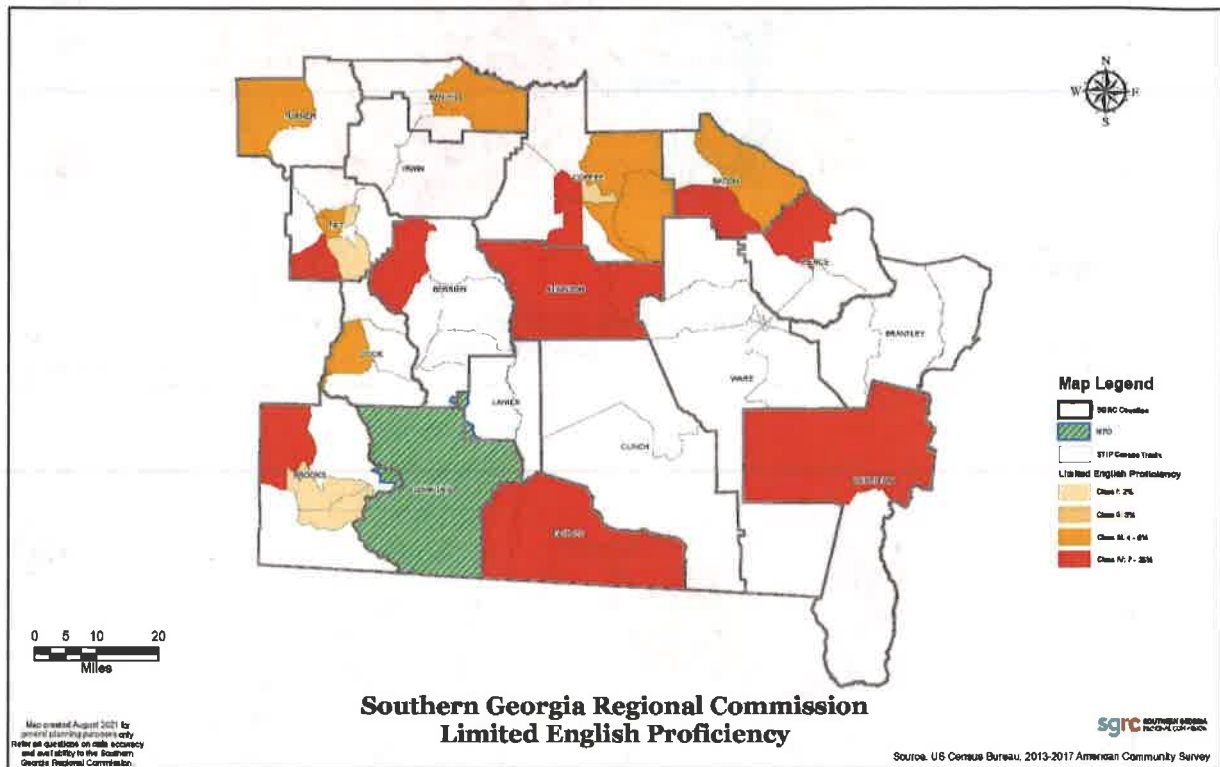
Language	Region	Percent of Population
Speak English less than "very well"	0	0%
Other Slavic Languages	41	0.011%
Speak English "very well"	2	0.001%
Speak English less than "very well"	39	0.010%
Armenian	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Persian	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Gujarati	882	0.23%
Speak English "very well"	305	0.08%
Speak English less than "very well"	577	0.15%
Hindi	329	0.086%
Speak English "very well"	182	0.048%
Speak English less than "very well"	147	0.038%
Urdu	153	0.040%
Speak English "very well"	140	0.037%
Speak English less than "very well"	13	0.003%
Other Indic languages	92	0.024%
Speak English "very well"	82	0.021%
Speak English less than "very well"	10	0.003%
Other Indo-European Languages	63	0.016%
Speak English "very well"	58	0.015%
Speak English less than "very well"	5	0.001%
Chinese	544	0.14%
Speak English "very well"	170	0.044%
Speak English less than "very well"	374	0.10%
Japanese	104	0.027%
Speak English "very well"	70	0.018%
Speak English less than "very well"	34	0.009%
Korean	571	0.15%
Speak English "very well"	311	0.081%
Speak English less than "very well"	260	0.068%
Mon-Khmer, Cambodian	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Hmong	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Thai	5	0.001%

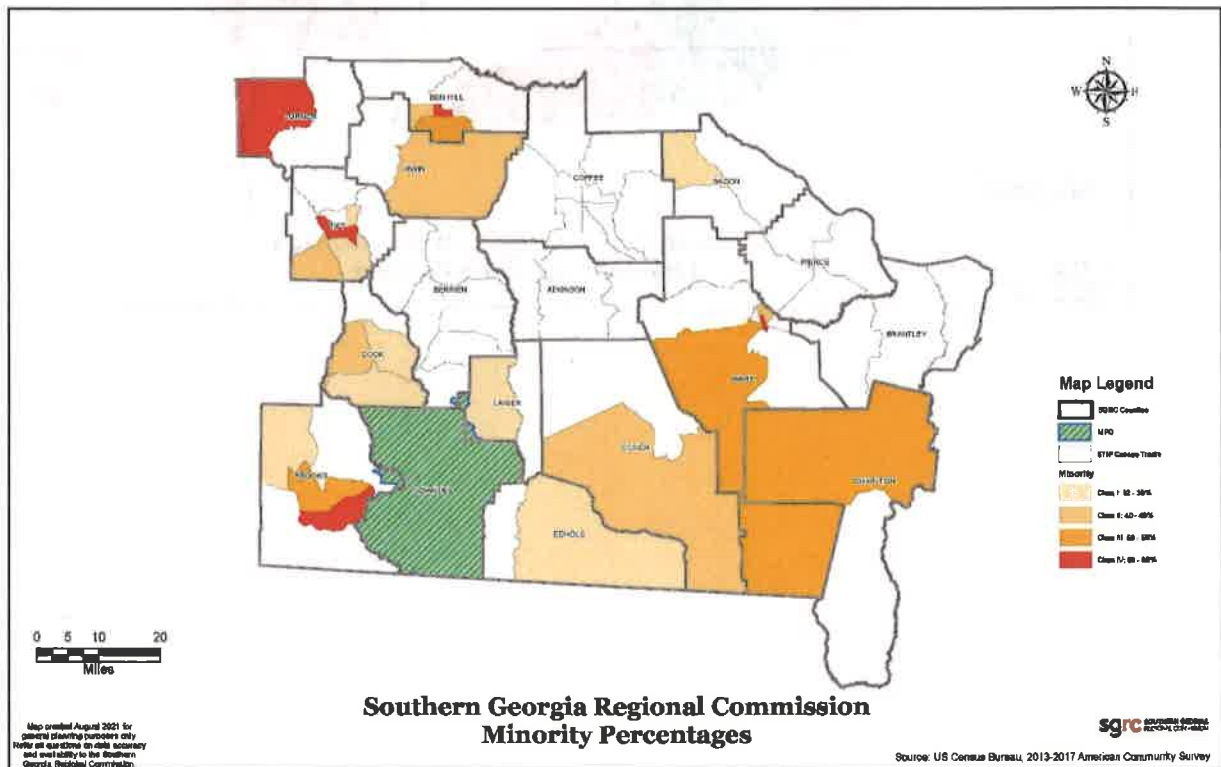
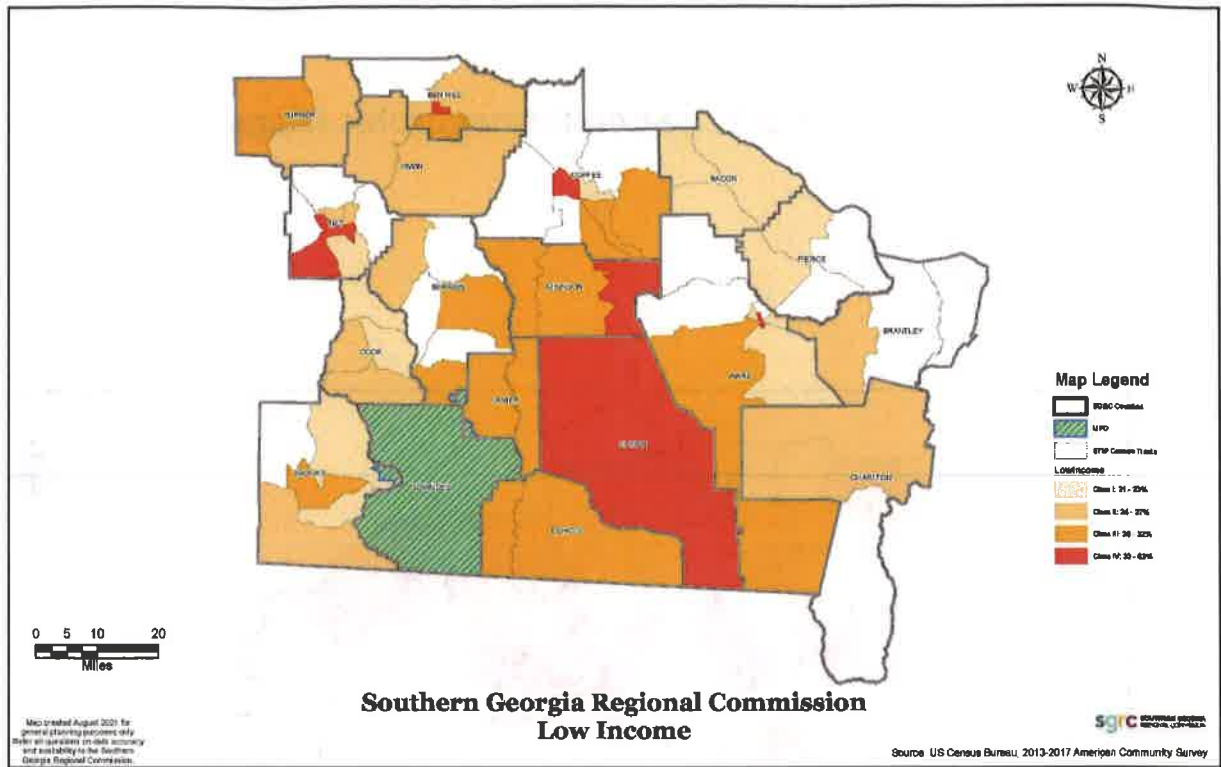
<u>Language</u>	<u>Region</u>	<u>Percent of Population</u>
Speak English "very well"	5	0.001%
Speak English less than "very well"	0	0%
Laotian	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Vietnamese	380	0.10%
Speak English "very well"	126	0.033%
Speak English less than "very well"	254	0.066%
Other Asian languages	59	0.015%
Speak English "very well"	32	0.008%
Speak English less than "very well"	27	0.007%
Tagalog	322	0.084%
Speak English "very well"	275	0.072%
Speak English less than "very well"	47	0.012%
Other Pacific Island languages	16	0.004%
Speak English "very well"	0	0%
Speak English less than "very well"	16	0.004%
Navajo	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Other Native American languages	25	0.007%
Speak English "very well"	25	0.007%
Speak English less than "very well"	0	0%
Hungarian	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Arabic	105	0.027%
Speak English "very well"	86	0.022%
Speak English less than "very well"	19	0.005%
Hebrew	14	0.004%
Speak English "very well"	14	0.004%
Speak English less than "very well"	0	0%
African languages	200	0.052%
Speak English "very well"	117	0.031%
Speak English less than "very well"	83	0.022%
Other and unspecified languages	157	0.041%
Speak English "very well"	20	0.005%
Speak English less than "very well"	137	0.036%

Appendix I

Demographic Maps

SGRC Region Demographic Maps





Appendix J

Title VI Equity Analysis

SGRC Transit has not performed Title VI Equity Analysis.

Appendix K

GDOT Concurrence Letter

GDOT Concurrence Letter

GDOT Concurrence Letter

GDOT Concurrence Letter

Via E-mail transmission



Russell R. McMurry, P.E., Commissioner
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308
(404) 631-1990 Main Office

August 23, 2021

Corey Hull, Transportation Director
Southern Georgia Regional Commission
1937 Carlton Adams Drive
Valdosta, GA 31601

Dear Mr. Hull,

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ashley Finch, Rail/Transit Planner directly at afinch@dot.ga.gov or (470) 432-1751.

Sincerely,

Kaycee Mertz



Kaycee Mertz
Transit Program Manager
Division of Intermodal