

THREE RIVERS REGIONAL COMMISSION



Title VI Plan

Updated: July 2021

Adopted: August 26, 2021

Approved: August 26, 2021

A handwritten signature in blue ink, appearing to read 'Norm Allen', is written over a horizontal line.

Norman Allen, TRRC Chairman



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		
10/18/2018	Title VI Webinar	Pavielle Ludlow	
6/30/2021	Plan Update	Tommy Kennedy	Including updated demographics and LAP
8/26/2021	Plan Adoption and Approval	Norman Allen	Chairman signed plan

Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan	1-1
2.0 Introduction & Description of Services	2-1
2.1 First Time Applicant Requirements	2-2
2.2 Annual Certifications and Assurances	2-2
2.3 Title VI Plan Concurrence and Adoption	2-3
3.0 Title VI Notice to the Public	3-1
3.1 Notice to Public	3-1
3.2 Notice Posting Locations	3-2
4.0 Title VI Procedures and Compliance	4-1
4.1 Complaint Procedure	4-1
4.2 Complaint Form	4-2
4.3 Record Retention and Reporting Policy	4-2
4.4 Sub-recipient Assistance and Monitoring	4-2
4.5 Sub recipients and Subcontractors	4-3
5.0 Title VI Investigations, Complaints, and Lawsuits	5-1
6.0 Public Participation Plan	6-1
7.0 Language Assistance Plan	7-1
8.0 Transit Planning and Advisory Bodies	8-1
9.0 Title VI Equity Analysis	9-1
10.0 System-Wide Service Standards and Service Policies	10-1
11.0 Appendices	11-1
APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: Three Rivers Regional Commission (TRRC)
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

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].

Three Rivers Regional Commission (TRRC) assures the Georgia Department of Transportation that no person shall on the basis of race, color, and national origins 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: Kirk Fjelstul

Executive Director, Three Rivers Regional Commission, Date: **August 26, 2021**

2.0 Introduction & Description of Services

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 in FTA Region 4, providing rural transit service in seven counties and coordinating with transit services in its other three member counties. A detailed description of the current TRRC public transit services is included in Appendix B.

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, color, and national origin of service area population to ensure underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

Title VI Liaisons:

Butts, Carroll, Lamar, Meriwether, Pike, Spalding and Upson Counties:

Tommy Kennedy, Transit Program Director
Three Rivers Regional Commission
120 North Hill Street
Griffin, GA 30224
678-692-0510, ext. 250

Carroll County Training Center Services:

Bethany King, Transportation Director
Carroll County Training Center
200 Alton Estes Dr.
Carrollton, GA 30117
770-836-6651, ext.313

Coweta County:

Kelly Mickle, Assistant County Administrator
Coweta County Board of Commissioners
22 East Broad Street
Newnan, Georgia 30263
770-254-2601

Troup County:

Corey Dunn, Transit Coordinator
 Troup County Parks and Recreation
 1220 LaFayette Parkway
 LaGrange, GA 30241
 706-298-7268

Heard County:

Samantha McKinney, Transit Director
 Heard County Transit
 470 Old Field Road
 Franklin, GA 30217
 706-675-1410

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.

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 Funding

1. DHS, \$1,882,524 FY2022 for the 10-county Region 4
2. 5311, \$734,990, FY2022 for TRRC's 7-county rural transit program

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.

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be

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.

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.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on [August 26, 2021](#). The Plan was approved and adopted by TRRC during a meeting held on [August 26, 2021](#). A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

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

TRRC 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 can be found on the FTA Circular 4702.1B, Chapter 3, website – http://www.fl.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.

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 tkennedy@threeriversrc.com. You may also send a letter to our administrative office at 120 North Hill Street Griffin, Ga. 30224 or P.O. Box 818 Griffin, Ga. 30224. For more information visit www.threeriversrc.com
- 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

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 <https://www.threeriversrc.com/transportation-services.php>. Additionally, TRRC will post the notice at collaborative, agencies offices, and on transit vehicles.

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 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 is available to the public on the TRRC website (<https://www.threeriversrc.com/transportation-services.php> www.threeriversrc.com) in both English and Spanish. If an individual is in need of oral translation assistance, TRRC staff has the ability to connect a translator into a phone call through a translation service.

4.0 Procedimientos y Conformidad del Título VI

4.1 Procedimiento de queja

Cualquier persona que crea que él o ella ha sido discriminada por raza, color u origen nacional por Three Rivers Regional Commission Transit puede presentar una queja del Título VI completando y enviando el Formulario de Quejas del Título VI de la agencia (consulte el Apéndice E). Three Rivers Regional Commission Transit investiga las quejas recibidas no más de 180 días después del presunto

incidente. Three Rivers Regional Commission Transit procesará las quejas que están completas.

Una vez recibida la queja, Three Rivers Regional Commission Transit la revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo en la que se le informará si nuestra oficina investigará la queja.

Three Rivers Regional Commission Transit tiene noventa (90) días para investigar la queja. Si se necesita más información para resolver el caso, Three Rivers Regional Commission Transit puede comunicarse con el demandante. El demandante tiene diez (10) días laborales a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el demandante no se comunica con el investigador o no recibe la información adicional dentro de los diez (10) días laborales, Three Rivers Regional Commission Transit puede cerrar el caso administrativamente. Un caso también puede ser cerrado administrativamente si el demandante ya no desea continuar con su caso.

Después de que el investigador revise la queja, él / ella emitirá una de las dos cartas al demandante: una carta de cierre o una carta de hallazgo (LOF). Una carta de cierre resume las acusaciones e indica que no hubo una violación del Título VI y que el caso se cerrará. Una LOF resume las acusaciones y las entrevistas sobre el presunto incidente y explica si ocurrirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene siete

(7) días para hacerlo desde el momento en que recibe la carta de cierre o la LOF.

El procedimiento de quejas se pondrá a disposición del público en el sitio web del Three Rivers Regional Commission (www.threeriversrc.com).

4.2 Complaint Form

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

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. 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.

4.4 Sub-recipient Assistance and Monitoring

FTA Circular 4702.1B, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

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

→ RMS Transit, Inc.
PO Box 113
Georgetown, GA 39854

4.5 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, 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, TRRC 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 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, and national origin 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.

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), 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.				

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 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

Following is a listing of TRRC public outreach efforts made over the last three (3) years. Note that the Covid-19 pandemic in 2020 curtailed many outreach activities that would have normally taken place.

Table 2: Outreach Activities FY2019, FY2020 and FY2021

Date	Activity	Concerned Person (Signature)	Remarks
	(Review/Update/Addendum/ Adoption/Distribution)		
1/9/2019	Spalding Collaborative	Pavielle Ludlow	
1/24/2019	Butts County Transportation Board Meeting	Pavielle Ludlow	
2/4/2019	LaGrange Troup Meeting TPPO	Pavielle Ludlow	
2/19/2019	GTA Board Retreat and Meeting	Pavielle Ludlow	
2/21/2019	Carroll County Transit Meeting	Pavielle Ludlow	
2/27/2019	Aging-Behavioral Health Collaborative Meeting	Pavielle Ludlow	Coweta
3/20/2019	Coweta Transportation Public Meeting	Pavielle Ludlow	
4/10/2019	Coweta Public Engagement Meeting	Pavielle Ludlow	The Newnan Center
4/16/2019	Coweta Public Engagement Meeting	Pavielle Ludlow	Central Community Center
4/18/2019	Coweta Public Engagement Meeting	Pavielle Ludlow	Madras Middle
4/24/2019	Carroll County Transit Meeting	Pavielle Ludlow	
4/25/2019	Upson and Pike Transit Plans Meeting	Pavielle Ludlow	
4/30/2019	Coweta Public Engagement Meeting	Pavielle Ludlow	Northgate High School

Date	Activity	Concerned Person (Signature)	Remarks
	(Review/Update/Addendum/ Adoption/Distribution)		
5/6/2019	Coweta Public Engagement Meeting	Pavielle Ludlow	Sharpsburg, Moreland
6/11/2019	Citizen Experience & Engagement Seminar	Pavielle Ludlow	
6/11/2019	Heard Compliance and Inspections	Pavielle Ludlow	
6/11/2019	Citizen Experience & Engagement Seminar	Pavielle Ludlow	
6/25/2019	GDOT Planning Meeting	Pavielle Ludlow	
8/7/2019	Troup Corrective Action Meeting	Pavielle Ludlow	
11/7/2019	Butts Transportation Board Meeting	Pavielle Ludlow	
11/13/2019	Pike County Board of Commissioners	Pavielle Ludlow	
11/22/2019	GDOT TAC Meeting	Pavielle Ludlow	
12/6/2019	Leadership Griffin Spalding - Building Communities Through Collaboration	Pavielle Ludlow	
12/6/2019	Carroll County Board of Commissioners Meeting	Pavielle Ludlow	
4/17/2020	Spalding County VOAD	Pavielle Ludlow	
4/21/2020	Meriwether County Family Connection Collaborative	Pavielle Ludlow	
5/7/2020	West Point Coalition	Pavielle Ludlow	
5/8/2020	GDOT Planning Meeting	Pavielle Ludlow	
6/17/2020	Coweta TCC	Pavielle Ludlow	
8/20/2020	Economic Recovery Summit	Pavielle Ludlow	
9/22/2020	Coweta TCC	Pavielle Ludlow	
12/16/2020	Coweta TCC	Pavielle Ludlow	
2/5/2021	Spalding County Transit Master Plan	Pavielle Ludlow	
2/18/2021	Local Interagency Planning Team) Meeting	Carla Robinson	
2/24/2021	Troup Meeting with new Transit Director	Tommy Kennedy	
2/24/2021	Upton County Collaborative	Carla Robinson	
3/10/2021	Heard Co. Collaborative	Carla Robinson	
3/10/2021	Spalding Co. Collaborative	Carla Robinson	
3/11/2021	3rd Annual Human Trafficking Summit	Pavielle Ludlow	
3/11/2021	Lamar Co. Collaborative	Carla Robinson	
3/15/2021	Butts Co. Collaborative	Carla Robinson	
3/16/2021	Meriwether County Collaborative	Pavielle Ludlow	
3/16/2021	Meriwether Co Collaborative	Carla Robinson	
3/17/2021	TCC Quarterly Meeting	Tommy Kennedy	Coweta
3/17/2021	Coweta TCC	Pavielle Ludlow	
3/24/2021	Opportunity Community Conference Planning	Pavielle Ludlow	
3/24/2021	Upton Co. Collaborative	Carla Robinson	

Date	Activity	Concerned Person (Signature)	Remarks
	(Review/Update/Addendum/ Adoption/Distribution)		
3/31/2021	Spalding County Transit Master Plan	Tommy Kennedy	
4/14/2021	Spalding Co. Collaborative	Carla Robinson	
4/22/2021	Coweta Gives To Heroes	Pavielle Ludlow	Summit Family YMCA
4/28/2021	Upton Co. Collaborative	Carla Robinson	
5/12/2021	Spalding Co. Collaborative	Carla Robinson	
5/13/2021	Lamar Co. Collaborative	Carla Robinson	
5/18/2021	Meriwether Co. Collaborative	Carla Robinson	
5/25/2021	Spalding County Transit Master Plan Public Meeting	Tommy Kennedy	Griffin
5/26/2021	GDOT Title VI Plan Update webinar	Tommy Kennedy	
6/16/2021	TCC Quarterly Meeting	Tommy Kennedy	Coweta
6/21/2021	Transportation Planning Group	Tommy Kennedy	
6/25/2021	Title VI Compliance Meeting	Tommy Kennedy	
4/22/2021	Spalding Collaborative	Pavielle Ludlow	
4/28/2021	Butts County Transportation Board Meeting	Pavielle Ludlow	
5/12/2021	LaGrange Troup Meeting TPPO	Pavielle Ludlow	
5/13/2021	GTA Board Retreat and Meeting	Pavielle Ludlow	
5/18/2021	Carroll County Transit Meeting	Pavielle Ludlow	

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).

TRRC operates a public transit system within seven (7) counties, which include Butts, Carroll, Lamar, Meriwether, 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. The resident's percentages in the TRRC service area who describe themselves as not able to communicate in English very well is listed in the 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 3 - Language Spoken At Home

County	Butts County		Carroll County		Lamar County	
Population 5 and over	22,759	22,759	109,782	109,782	17,588	17,588
English only	21,766	95.6%	102,107	93.0%	17,101	97.2%
Language other than English	993	4.4%	7,675	7.0%	487	2.8%
Speak English less than "very well"	263	1.2%	3,450	3.1%	99	0.6%
Spanish	650	2.9%	5,731	5.2%	271	1.5%
Speak English less than "very well"	194	0.9%	2,792	2.5%	31	0.2%
Other Indo-European languages	216	0.9%	1,040	0.9%	102	0.6%
Speak English less than "very well"	23	0.1%	401	0.4%	39	0.2%
Asian and Pacific Islander languages	93	0.4%	719	0.7%	18	0.1%
Speak English less than "very well"	30	0.1%	257	0.2%	6	0%
Other languages	34	0.1%	185	0.2%	96	0.5%
Speak English less than "very well"	16	0.1%	0	0%	23	0.1%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

Table 3 - Language Spoken At Home, continued

County	Meriwether Co.		Pike County		Spalding County	
Population 5 and over	19,852	19,852	17,438	17,438	61,348	61,348
English only	19,551	98.5%	17,111	98.1%	58,830	95.9%
Language other than English	301	1.5%	327	1.9%	2,518	4.1%
Speak English less than "very well"	101	0.5%	106	0.6%	1,007	1.6%
Spanish	216	1.1%	230	1.3%	1,944	3.2%
Speak English less than "very well"	78	0.4%	79	0.5%	798	1.3%
Other Indo-European languages	47	0.2%	17	0.1%	370	0.6%
Speak English less than "very well"	0	0%	0	0.0%	160	0.3%
Asian and Pacific Islander languages	38	0.2%	80	0.5%	143	0.2%
Speak English less than "very well"	23	0.1%	27	0.2%	49	0.1%
Other languages	23	0.1%	0	0.0%	61	0.1%
Speak English less than "very well"	0	0%	0	0.0%	0	0.0%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

Table 3 - Language Spoken At Home, continued

County	Upson County	
Population 5 and over	24,468	24,468
English only	23,768	97.1%
Language other than English	700	2.9%
Speak English less than "very well"	216	0.9%
Spanish	420	1.7%
Speak English less than "very well"	199	0.8%
Other Indo-European languages	268	1.1%
Speak English less than "very well"	17	0.1%
Asian and Pacific Islander languages	12	0.0%
Speak English less than "very well"	0	0.0%
Other languages	0	0.0%
Speak English less than "very well"	0	0.0%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

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.

TRRC has a Council that has thirty-five (35) member seats with currently 30 active members that are appointed by the Georgia State Law that governs Regional Commissions. The racial makeup of those 30 active members is summarized in the following table.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Three Rivers Regional Commission Council	77%	0%	23%	0%	0%	0%

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, TRRC will ensure the following:

1. 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.
2. 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.
3. 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.

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.

TRRC is not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: TRRC SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS

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

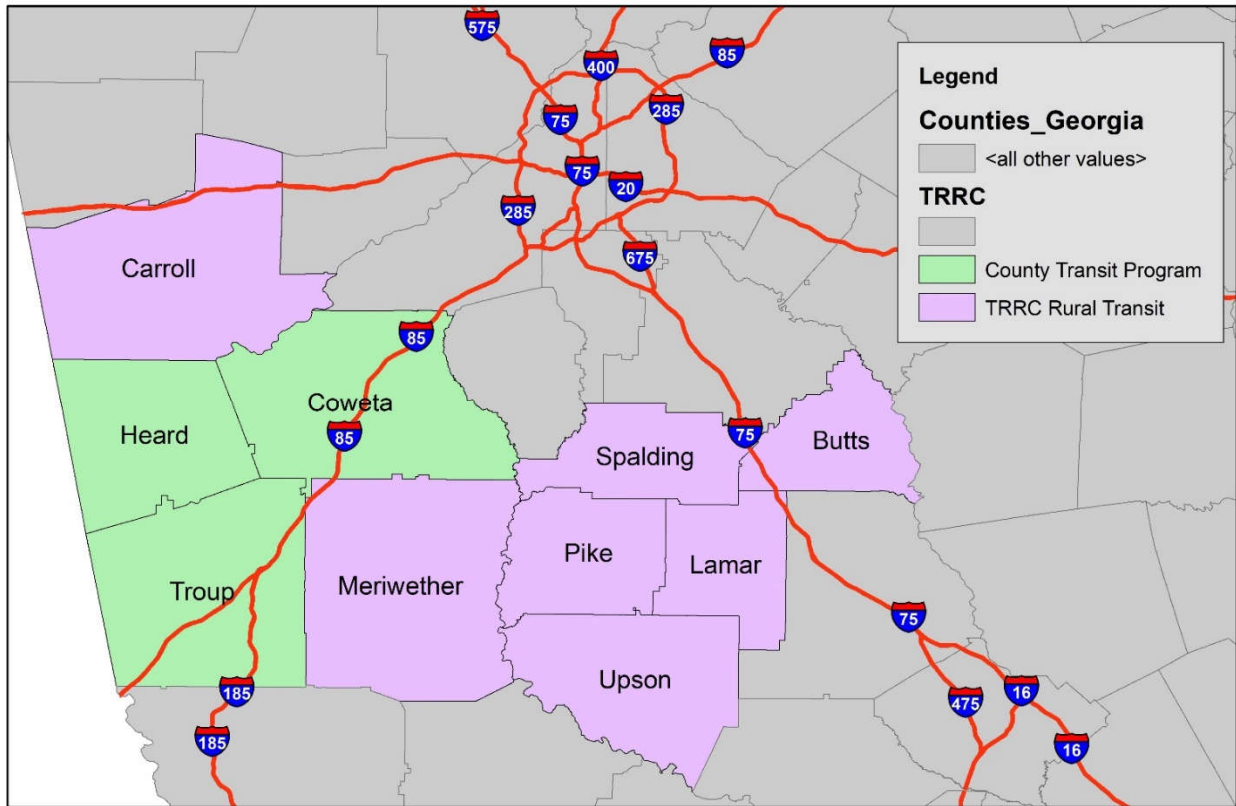
Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.
Three Rivers Regional Commission (TRRC) is a 10-county regional planning commission that includes the West Central Georgia area counties of Butts, Carroll, Coweta, Heard, Lamar, Meriwether, Pike, Spalding, Troup and Upson. TRRC operates rural transit services in seven of those counties through contract with an operator and as a sub-recipient through the Georgia Department of Transportation. 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.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.
TRRC is a regional planning commission and is managed by its member governments in accordance with Georgia law. TRRC is made up of approximately 64 full-time employees. TRRC works with local governments to provide aging services, workforce development, transportation, and local/regional planning. TRRC is managed by a Council comprised of 35 representatives from its' member counties and cities and appointees of the Governor, Lt. Governor and Speaker. TRRC operates from its' offices at 120 North Hill Street, Griffin GA 30024 (678)692-0510.
3. A detailed description of service routes and ridership numbers
The TRRC Rural Public Transportation services are operated in Carroll, Butts, Lamar, Meriwether, Pike, Spalding and Upson counties as shown on the map below. Public transportation services in Coweta, Heard and Troup Counties are provided and operated by those individual counties. TRRC Public Transportation services are on-demand, with reservations being required at least one day in advance. The TRRC Rural Public Transportation system does not operate fixed route service. 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. We prioritize grouping trips and multi-loading to the maximum extent possible.

Figure 1 - TRRC Rural Public Transit



Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

To be provided at a later date

TO: COUNCIL, THREE RIVERS REGIONAL COMMISSION

FROM: MS. FAYE PERDUE, SECRETARY, THREE RIVERS REGIONAL COUNCIL

SUBJECT: MINUTES OF MEETING HELD AUGUST 26, 2021

The Regional Council of the Three Rivers Regional Commission held its meeting at 2:00 p.m. on Thursday, August 26, 2021 at the Turin Town Hall in Turin, Georgia.

WELCOME, CALL TO ORDER, INVOCATION AND PLEDGE OF ALLEGIANCE

Chairman Norman Allen welcomed everyone and called the meeting to order. Mr. Bennie Horton gave the invocation and afterwards Chairman Allen led everyone in reciting the Pledge of Allegiance. The roll call was taken, and the following individuals attended:

Regional Council Members in Attendance

Mr. Ken Rivers, Commissioner, Butts County
Ms. Kay Pippin, Mayor, City of Jackson
Mr. Terry Nolan, Non-Public Member, Butts County
Mr. Kevin Hemphill, Non-Public Member, Carroll County
Mr. Dustin Koritko, Council Member, City of Newnan
Mr. Greg Wright, Non-Public Member, Coweta County
Mr. Denney Rogers, Mayor, City of Ephesus
Ms. Kathy Knowles, Non-Public Member, Heard County
Mr. Bennie Horton, Commissioner, Lamar County
Mr. Cecil McDaniel, Council Member, City of Barnesville
Ms. Charlene Glover, Mayor, City of Greenville
Mr. Joe Walter, Mayor, City of Zebulon
Mr. Ric Calhoun, Non-Public Member, Pike County
Mr. Doug Hollberg, Mayor, City of Griffin
Mr. Patrick Crews, Chairman, Troup County
Mr. Jim Thornton, Mayor, City of LaGrange
Mr. Curtis Brown, Jr., Non-Public Member, Troup County
Mr. Norman Allen, Chair, Upson County
Mr. John Rainwater, Lt. Governor's Appointee

Regional Council Members Absent

Ms. Michelle Morgan, Chair, Carroll County
Ms. Shirley Marchman, Council Member, City of Villa Rica
Mr. Lee Boone, Chair, Heard County
Mr. Irvin Trice, Non-Public Member, Lamar County
Mr. Bryan Threadgill, Chair, Meriwether County
Ms. Faye Perdue, Non-Public Member, Meriwether County
Mr. Tim Daniel, Commissioner, Pike County
Ms. Gwen Flowers-Taylor, Commissioner, Spalding County
Mr. Matthew Middleton, Non-Public Member, Spalding County
Mr. J. D. Stallings, Mayor, City of Thomaston
Ms. Hannah (Ellington) Arnette, Non-Public Member, Upson County
Vacant, Non-Public Member, Carroll County
Vacant, Governor's Appointees
Vacant, Speaker's Appointee

Guests in Attendance

Ms. Corinne Thornton, Office Director of Regional Community Services, Department of Community Affairs

Staff Present

Mr. Kirk Fjelstul, Executive Director
Ms. Amanda Turner, Deputy Administrative Services Director
Ms. Jan Perez, Secretary, Administrative Services
Ms. Jeannie Brantley, Planning Director
Ms. Joy Shirley, AAA Director
Ms. Morgan Weaver, Nursing Home Transitions Coordinator, AAA Program
Mr. Tommy Kennedy, Director, Transit Program
Ms. Alena Andrews, Resource Specialist, Workforce Development

APPROVAL OF AGENDA (action item)

Chairman Allen asked for a motion to approve the agenda. **FORMAL ACTION: Mr. Dustin Koritko made the motion to approve the agenda; it was seconded by Mr. Terry Nolan. Chairman Allen asked if there was any discussion; hearing none, he asked if there were any objections to the motion. No one voiced any objections, and the motion carried unanimously.**

APPROVAL OF MINUTES – JUNE 24, 2021 MEETING (action item)

Chairman Allen asked for a motion to approve the June 24, 2021 meeting minutes. **FORMAL ACTION: Ms. Charlene Glover made the motion to approve the June 24, 2021 meeting minutes; it was seconded by Mr. Koritko. Chairman Allen asked if there was any discussion; hearing none, he asked if there were any objections to the motion. No one voiced any objections, and the motion carried unanimously.**

CHAIRMAN'S REPORT

Nominating Committee (action item)

Chairman Allen asked the members of the council to authorize him to begin appointing a Nominating Committee in order to make recommendations for Council Chair, Vice-Chair and Secretary, Chairs for both committees, and Policy Official for the Georgia Association of Regional Commissions (GARC). Chairman Allen asked for a motion concerning the Nominating Committee. **FORMAL ACTION: Mr. Koritko made the motion that the council authorize the chairman to appoint a Nominating Committee in order to make recommendations for the slate of officers, chairs for the committees and the GARC Policy Official; it was seconded by Mr. Curtis Brown. Chairman Allen asked if there was any discussion; hearing none, he called for the vote and the motion carried unanimously. He asked that any member interested in being nominated for an office please contact him, Mr. Kirk Fjelstul or Ms. Perez.**

Richard English, Jr. Recognition

A video clip of Mr. Richard English, Jr.'s service was played which featured remarks from both Mayor Jim Thornton and Troup County Chairman Patrick Crews. Both men were in attendance at today's meeting and gave additional remarks concerning Mr. English and his legacy.

Mr. Fjelstul announced that Mr. Bennie Horton's spouse, Mrs. Vivadon Wilcher-Horton, had recently passed away and Mrs. Shirley Marchman's spouse, Mr. Willie Marchman, recently passed away as well. Mr. Fjelstul asked that the council keep these members and their families in their thoughts and prayers.

Chairman Allen took a moment to welcome the TRRC's newest Council member, Mr. Kevin Hemphill. Mr. Hemphill is the Non-Public Member from Carroll County.

EXECUTIVE DIRECTOR'S REPORT

Three Rivers Video

Mr. Fjelstul played a short video that showed various TRRC employees describing the different departments and their (departments') roles in the communities, etc. The video was well received by the members. This video will be posted to the TRRC website within the next few weeks. The video project was spear-headed by Ms. Morgan Weaver and Ms. Alena Andrews. Mr. Fjelstul introduced the pair to the council and asked them to comment on the project.

Peggi Tingle Retirement

Mr. Fjelstul advised the council that Ms. Peggi Tingle will retire effective October 1, 2021. It was noted that we will "do something more appropriate at the next meeting" to commemorate this occasion.

News from the Region

Mr. Fjelstul requested that we defer this topic to another time (meeting) due to time constraints.

COMMITTEE REPORTS

Finance, Audit and Administration Committee

August 26, 2021 Meeting:

Committee Chair Ken Rivers presented the Finance, Audit and Administration Committee reports. He advised the council that the Finance, Audit and Administration Committee met earlier and proceeded with the report.

Review of Executive Director's June and July Expenditures (action items)

FORMAL ACTION: Committee Chair Rivers reported that the Finance, Audit and Administration Committee made the recommendation to approve the Executive Director's June 2021 expenditure report in the amount of \$90 which were to attend chamber events. The committee made the recommendation to approve the Executive Director's July 2021 expenditure report in the amount of \$7,194.43. A total of \$500 was for the GMA Convention. The remainder was a contract payment where a Three Rivers contract required a credit card as the form of payment, and the Executive Director used the Three Rivers credit card. Chairman Allen advised that the committee's recommendation is in the form of a motion. He called for the vote; no one voiced any opposition, and the motion carried unanimously.

Request for Proposals: In-Home Service Provider (action item)

Committee Chair Rivers advised that the current contractor was unable to continue performing at the contracted rates because of changes in the employee markets. As a result, Three Rivers issued a new RFP. **FORMAL ACTION:** The Finance, Audit and Administration Committee made the recommendation to authorize the Executive Director to negotiate and execute a contract with the proposer with the highest score, Help at Home, Inc. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

SCSEP Update

Committee Chair Rivers advised that there is no action required on this item. This is the Title V program for employing older Americans. The Finance, Audit and Administration Committee has been receiving updates from the Aging Program over concerns raised with the match during the COVID pandemic. The Department of Aging Services (DAS) has issued several findings related to documentation and use of financial software in reporting in-kind match. Staff has been working with DAS on corrective action plans. The Finance, Audit and Administration Committee will continue to monitor this item until the findings are addressed.

Contracts with City of Griffin for the update of Community Redevelopment Plans (action items)

FORMAL ACTION: Committee Chair Rivers advised that the Finance, Audit and Administration Committee made the recommendation to approve two (2) agreements with the City of Griffin to assist with redevelopment plans, one for Downtown Griffin in the amount of \$25,000 and the second for North Hill Street in the amount of \$30,000.

Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

Memorandum of Agreement for the REVAMP with Middle GA Regional Commission (action item)

FORMAL ACTION: Committee Chair Rivers advised that the Finance, Audit and Administration Committee made the recommendation to approve the annual REVAMP agreement with the Middle Georgia Regional Commission in the amount of \$33,000 to provide data for a joint regional commission project with GDOT. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

Approval of Updated GDOT Title VI Plan (action item)

Committee Chair Rivers reminded the council that this is a required update every three (3) years. He advised that the Finance, Audit and Administration Committee made the recommendation to approve the revised Title VI Plan. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

Finance Committee Contract Authority (action item)

Committee Chair Rivers gave a brief background of this particular subject with both Committee Chair Rivers and Chairman Allen noting that this item has had "quite a bit of discussion for some time." **FORMAL ACTION:** Committee Chair Rivers advised that the Finance, Audit and Administration Committee made the recommendation to grant authority to the Finance, Audit and Administration Committee to consider and approve contracts only when necessary. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

Executive Session Regarding Pending or Threatened Litigation

Committee Chair Rivers advised that this was for informational purposes only and no action is required. This was an executive session to discuss a cyber-attack and incident response measures. It was noted that there was an executive session at the August 6 Special Called meeting of the Finance, Audit and Administration Committee. Mr. Fjelstul provided a brief history of when the cyber-attack incident occurred (July 20, 2021); this incident locked the employees out of the system for a couple of days. Our IT contractor worked quickly to get the system up and available for the TRRC employees. This incident was reported to the appropriate state and federal agencies. TRRC has retained an incident response law firm to guide us as to what we need to do; a forensics group has also been retained to assist with this situation. It was also noted that we have cyber insurance, which will "cover the important work that is being done."

Electronic Incident Response Contracts (action items)

FORMAL ACTION: Committee Chair Rivers advised that the Finance, Audit and Administration Committee made the recommendation to ratify and authorize three (3) cyber incident response contracts that are required to protect the interests of the regional commission, including Mullen Coughlin; Kroll; and Coveware. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

August 6, 2021 Special Called Meeting:

Executive Session Regarding Pending or Threatened Litigation

Committee Chair Rivers advised that this was the same information that was just provided for the August 26, 2021 committee report.

ADP Payroll Service Authorization (action item)

Committee Chair Rivers provided background on this item. With the recent loss of some payroll processing staff and the HR manager, staff determined that it was cost effective to contract for payroll support services and a portion of HR. It will also help with regulatory compliance and staff turnover of administrative positions. **FORMAL ACTION:** Committee Chair Rivers advised that the Finance, Audit and Administration Committee made the recommendation to authorize the Executive Director to contact with ADP for payroll and HR services. Chairman Allen advised that the committee's recommendation is in the form of a motion. He then asked if there was any discussion; hearing none, he called for the vote. No one voiced any opposition, and the motion carried unanimously.

This concluded Committee Chair Rivers' report from the Finance, Audit and Administration Committee.

Planning and Projects Committee

August 26, 2021 Meeting:

Committee Chair Curtis Brown presented the Planning and Projects Committee reports. He advised the council that the Planning and Projects Committee met earlier and proceeded with the report.

TRRC Broadband Task Force

Committee Chair Brown advised that Mr. Paul Jarrell presented the update on the Broadband Task Force. DCA's GBDI Grant Eligibility Map is available for access on the DCA website. This map shows Census Blocks by county that are eligible for broadband grants. The State Fiscal Recovery Funds grant (for broadband activities) is open and accepting applications; however, the grant applications are due October 31, 2021. Committee Chair Brown did advise that the National Telecommunications and Information Administration is no longer accepting grant applications. Meriwether and Heard counties have applied for grants with this agency.

The council was made aware of recent expansion initiatives between several EMCs and their partnering companies. The Diverse Power and Kudzu expansion will provide service extensions into portions of Coweta, Harris, Meriwether and Troup counties while also expanding broadband into incorporated areas and provide coverage for much of the cities of Hogansville and Grantville. This expansion will involve 900 miles of fiber and it is an investment worth approximately \$37 million.

Central GA EMC, Southern Rivers and Conexon will have a Butts County expansion phase very soon which will provide service for 95% of unserved sites post expansion.

The Partnership for Inclusive Innovation (PIN) has revealed the 2021 Cohorts of the Georgia Smart Communities Challenge; the selected communities include the City of Woodbury, the City of Concord, Pike County and Spalding County. These communities are focusing on advancing connectivity, analyzing technologies to improve connectivity, identifying methods to increase broadband access, etc.

Grants Update

Committee Chair Brown advised that Mr. Brandon Lounsbury disclosed several grant opportunities that are available to communities; these grants are available at the state and federal levels. The State Recovery Fund is an opportunity for communities to apply for grants in three (3) different categories that the state is implementing from ARPA funding. The categories include broadband infrastructure, water and sewer infrastructure, and negative economic impact. The deadline to submit applications is October 31, 2021, and the funds will be awarded in January 2022. Mr. Lounsbury has shared this information with the local communities.

Census Update

Committee Chair Brown advised that Ms. Jeannie Brantley provided the Census Update during the committee meeting. The Census Bureau has released some Census 2020 statistical data as of last week. According to the 2020 Census, TRRC's ten county area's population is 524,586, which is a 7.1% increase from the 2010 Census. Housing units for the region increased by 5% or by 9,519 units for the region. Regarding population, it was also noted that a total of 403,028 residents in the region are 18 years and older.

Committee Chair Brown also reported that there are Bicycle Safety Workshops slated for August. One is scheduled for August 30 at the Carrollton Police Department (*Traffic Enforcement for Bicycle Safety*) and is geared towards public safety personnel. The other workshop is August 31 (*Bicycle Safety: Georgia Law and Best Practices*) which will be held at the Senoia Police Department and is for local government officials, staff, planners, citizen advocates, etc.

This concluded Committee Chair Brown's report from the Planning and Projects Committee.

OLD BUSINESS

Nothing was presented under this portion of the agenda.

NEW BUSINESS

Ms. Kay Pippin asked the question of "what tangible benefits have we seen from Talentspace contract?" Mr. Fjelstul responded that the new contract has been in place for a short time and that an update will be given on this subject.

OTHER BUSINESS

Nothing was presented under this portion of the agenda.

GOOD OF THE ORDER

Mr. Rivers reported on the Creeks Trail in Jackson that Ms. Pippin helped to establish. Ms. Pippin received a round of applause from the council. She encouraged the members to visit the Creeks Trail.

It was shared that Mr. Jim Thornton was the new GMA President; Mr. Thornton received a round of applause from the council.

Mr. Joe Walter announced that the new VA Outpatient Clinic in Zebulon should be finished next month. The clinic is scheduled to open in February or March of 2022. The clinic is expected to serve up to 700 patients a day.

Chairman Allen shared that the courthouse renovations are almost complete. The cupola is being fabricated in Campbellsville, Kentucky, and it should arrive soon in Upson County.

Mr. Koritko mentioned his thanks to the TRRC staff for the video and noted that the TRRC staff will help with Newnan's Comprehensive Plan.

DATE AND LOCATION OF NEXT MEETING

Chairman Allen announced that the next meeting will be held at 2:00 p.m. on Thursday, October 28, 2021; additional meeting details will follow.

ADJOURNMENT

Chairman Allen adjourned the meeting after receiving a motion from Mr. Koritko.

Faye Perdue, Secretary



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

August 23, 2021

Mr. Tommy Kennedy, Transit Program Director
Three Rivers Regional Commission
P. O. Box 818
120 North Hill Street
Griffin, GA 30224

Dear Mr. Kennedy,

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
Transit Program Manager
Division of Intermodal

Appendix D

Title VI 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 tkennedy@threeriversrc.com. You may also send a letter to our administrative office at 120 North Hill Street Griffin, Ga. 30224 or P.O. Box 818 Griffin, Ga. 30224. For more information visit www.threeriversrc.com
- 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

Notificando al público sobre los derechos bajo el Título VI

THREE RIVERS REGIONAL COMMISSION (TRRC)

- TRRC opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que él o ella ha sido agravado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante TRRC.
- Para obtener más información sobre el programa de derechos civiles de TRRC y los procedimientos para presentar una queja, comuníquese al (678) 692-0510, envíe un correo electrónico a tkennedy@threeriversrc.com o visite nuestra oficina administrativa en 120 N. Hill St. o P.O. Box 818, Griffin, GA. Para obtener más información, visite www.threeriversrc.com.
- Si necesita información en otro idioma, llame al 678-692-0510.
- También puede presentar su queja directamente ante el FTA en: Oficina de Derechos Civiles de la Administración Federal de Tránsito: Coordinador del Programa Título VI, Edificio Este, 5to piso - TCR 1200 New Jersey Ave., SE, Washington, DC 20590.

Appendix E

Title VI Complaint Forms

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):				
<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 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:

Tommy Kennedy
Three Rivers Regional Commission
678-692-0510, ext. 250
tkennedy@threeriversrc.com

COMISION REGIONAL DE TRES RIOS

Formularies de quota Del Tituli VI

Sección I:				
Nombre:				
Dirección:				
Teléfono (hogar):			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, vaya a la Sección III.				
De lo contrario, proporcione el nombre y la relación de la persona por la cual se está quejando:				
Explique por qué ha presentado una solicitud para un tercero: _____				
Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una 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 presunta discriminación (mes, día, año): _____ Explique lo más claramente posible qué sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de las personas que lo discriminaron (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 previamente una queja de Título VI con esta agencia?	Sí	No

Sección V

¿Ha presentado esta queja ante alguna 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:

Seccion VI

El nombre de la queja de la agencia es 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 requeridas a continuación

Firma Fecha

Envíe este formulario en persona a la siguiente dirección o envíe este formulario a:

Tommy Kennedy
Comisión regional de tres ríos
678-692-0510
tkennedy@threeriversrc.com

Title VI 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.				

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 TRRC 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
- As Carroll County has the largest Spanish speaking population with individuals who speak English less than very well, Carroll County as part of it's process distributes notifications translated into Spanish that are requesting community input. TRRC does not currently have fluent Spanish speakers in the office, but should a Spanish speaking person call the TRRC office and need translation, the staff has the ability to connect a translator into that telephone conversation through a contract translation service.

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 decision, and the public can request a public hearing.

No public hearings have been requested at this time.

Council Meetings

TRRC conducts regular meetings of the Council and committees. These meetings are open to the public. The meeting calendar, agendas and minutes are found on the TRRC website at: <https://www.threeriversrc.com/business.php>.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

TRRC operates a rural transit system within a seven-county service area. This 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 the TRRC Rural Transit System service area there are 5,242 residents or 1.9% who describe themselves as not able to communicate in English “very well” (Source: US Census, American Community Survey, 2019 5-year Estimates Data Profiles, Table DP02). The majority of these persons (4,171 or 1.5%) speak Spanish and describe themselves as able to communicate in English less than “very well”. More specifically, 2,792 (2.5%) of those Spanish-speaking persons reside in Carroll County and describe themselves as able to communicate in English less than “very well”. This exceeds the Safe Harbor threshold described 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 (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 some LEP individuals, public transit is the principal transportation mode available. It is important for TRRC to communicate effectively with all of its transit riders. When TRRC is able to communicate effectively with all of its transit riders, the service provided is safer, more reliable, convenient, and

accessible for all within its service area. TRRC is committed to taking reasonable steps to ensure meaningful access for LEP individuals to the transit services in accordance with Title VI.

This plan will demonstrate the efforts that TRRC 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

II. 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

The following analysis uses demographic data from US Census’ American Community Survey through year 2019. The data for each individual county and the entire 7-county service area is provided in Appendix H.

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

In the TRRC Rural Transit System service area there are 5,242 residents or 1.9% who describe themselves as not able to communicate in English “very well” (Source: US Census, American Community Survey, 2019 5-year Estimates Data Profiles, Table DP02). The majority of these persons (4,171 or 1.5%) speak Spanish and describe themselves as able to communicate in English less than “very well”. More specifically, 2,792 (2.5%) of those Spanish-speaking persons reside in Carroll County and describe themselves as able to communicate in English less than “very well”. (This exceeds the Safe Harbor threshold and is described further below.) Latinos are the primary LEP persons likely to utilize TRRC services.

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. Should LEP person need translation, TRRC staff have access to translation services via telephone.

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 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.

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 4: The Resources Available to the Recipient and Costs

The TRRC assessed its resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These current resources being used include the following:

- Both English and Spanish versions of the Title VI complaint process
- Both English and Spanish versions of the Title VI complaint form (will add Spanish version to TRRC web site)
- Oral translation or interpretive services via telephone (can be conferenced into a telephone call should a caller not be able to communicate affectively in English)
- Translation of other documents upon request.

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 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 will take reasonable steps to provide the opportunity for meaningful access to Limited English Proficient individuals who have difficulty communicating with staff. Essential transit-related documents are currently available in Spanish. Telephone-based interpreter services are available upon request. And, 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.

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.

TRCC has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). Approximately 95% of the population in the service area speaks English only. The largest non-English spoken language in the service area is Spanish (3.5%). And, 1.5% of the population speak Spanish and speak English less than “very well”.

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 TRRC staff 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

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. 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.

c. Element 3: Training Staff

Federal guidance states that 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

d. Element 4: Providing Note to LEP Persons

TRRC 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 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.

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 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.

IV. Safe Harbor Provision

USDOT 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.

The TRRC Rural Transit service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish speakers in Carroll County qualify for the Safe Harbor Provision as the

number of person which speak English less than “very well” is counted as 2.5% and 2,792 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. 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 Transit Service Area

County	Butts County		Carroll County		Lamar County	
Population 5 and over	22,759	22,759	109,782	109,782	17,588	17,588
English only	21,766	95.6%	102,107	93.0%	17,101	97.2%
Language other than English	993	4.4%	7,675	7.0%	487	2.8%
Speak English less than "very well"	263	1.2%	3,450	3.1%	99	0.6%
Spanish	650	2.9%	5,731	5.2%	271	1.5%
Speak English less than "very well"	194	0.9%	2,792*	2.5%*	31	0.2%
Other Indo-European languages	216	0.9%	1,040	0.9%	102	0.6%
Speak English less than "very well"	23	0.1%	401	0.4%	39	0.2%
Asian and Pacific Islander languages	93	0.4%	719	0.7%	18	0.1%
Speak English less than "very well"	30	0.1%	257	0.2%	6	0%
Other languages	34	0.1%	185	0.2%	96	0.5%
Speak English less than "very well"	16	0.1%	0	0%	23	0.1%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

* meets threshold for Safe Harbor Provision

County	Meriwether Co.		Pike County		Spalding County	
Population 5 and over	19,852	19,852	17,438	17,438	61,348	61,348
English only	19,551	98.5%	17,111	98.1%	58,830	95.9%
Language other than English	301	1.5%	327	1.9%	2,518	4.1%
Speak English less than "very well"	101	0.5%	106	0.6%	1,007	1.6%
Spanish	216	1.1%	230	1.3%	1,944	3.2%
Speak English less than "very well"	78	0.4%	79	0.5%	798	1.3%
Other Indo-European languages	47	0.2%	17	0.1%	370	0.6%
Speak English less than "very well"	0	0%	0	0.0%	160	0.3%
Asian and Pacific Islander languages	38	0.2%	80	0.5%	143	0.2%
Speak English less than "very well"	23	0.1%	27	0.2%	49	0.1%
Other languages	23	0.1%	0	0.0%	61	0.1%
Speak English less than "very well"	0	0%	0	0.0%	0	0.0%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

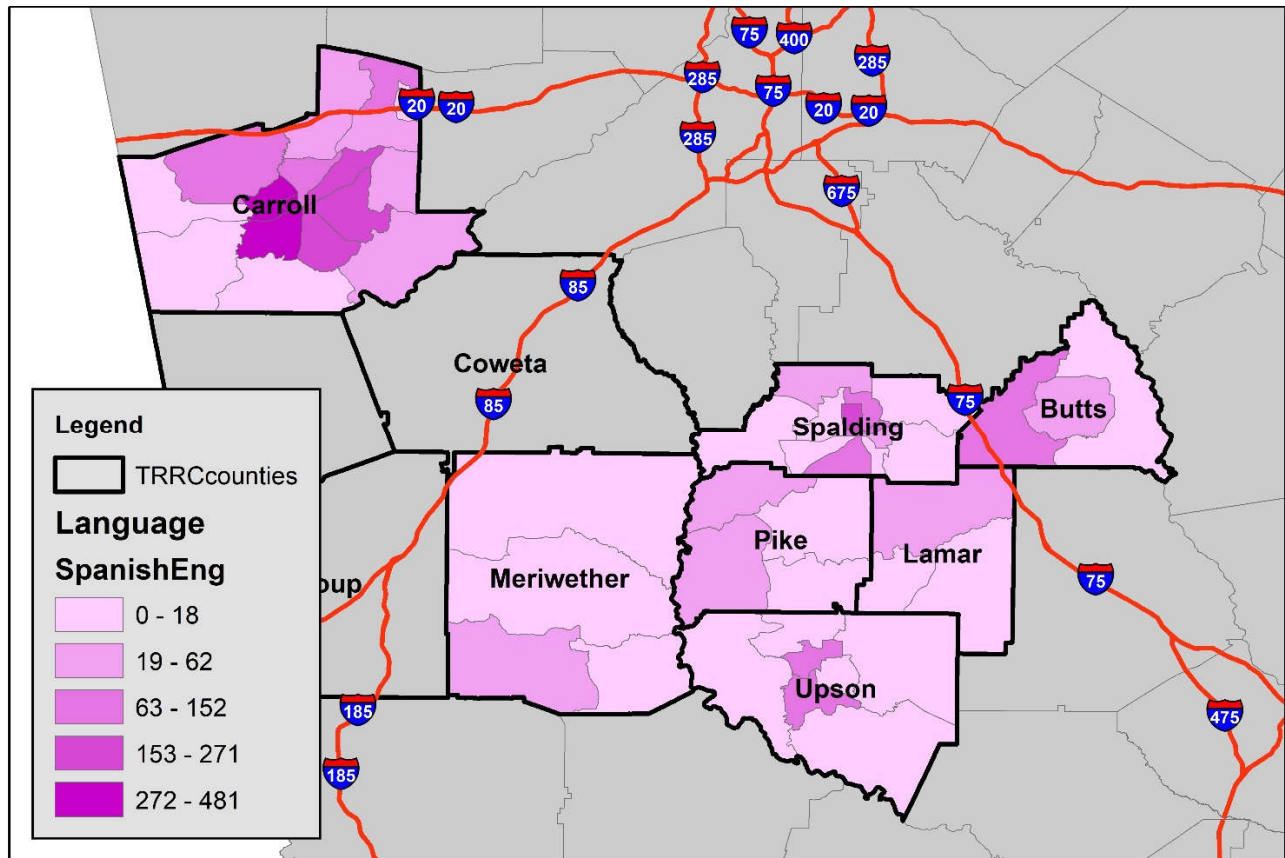
County	Upson County		TRRC 7-County Region	
Population 5 and over	24,468	24,468	73,235	273,235
English only	23,768	97.1%	260,234	95.2%
Language other than English	700	2.9%	13,001	4.8%
Speak English less than "very well"	216	0.9%	5,242	1.9%
Spanish	420	1.7%	9,462	3.5%
Speak English less than "very well"	199	0.8%	4,171	1.5%
Other Indo-European languages	268	1.1%	2,060	0.8%
Speak English less than "very well"	17	0.1%	640	0.2%
Asian and Pacific Islander languages	12	0.0%	1,103	0.4%
Speak English less than "very well"	0	0.0%	392	0.1%
Other languages	0	0.0%	376	0.1%
Speak English less than "very well"	0	0.0%	39	0.0%

Source: US Census, American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

Appendix I

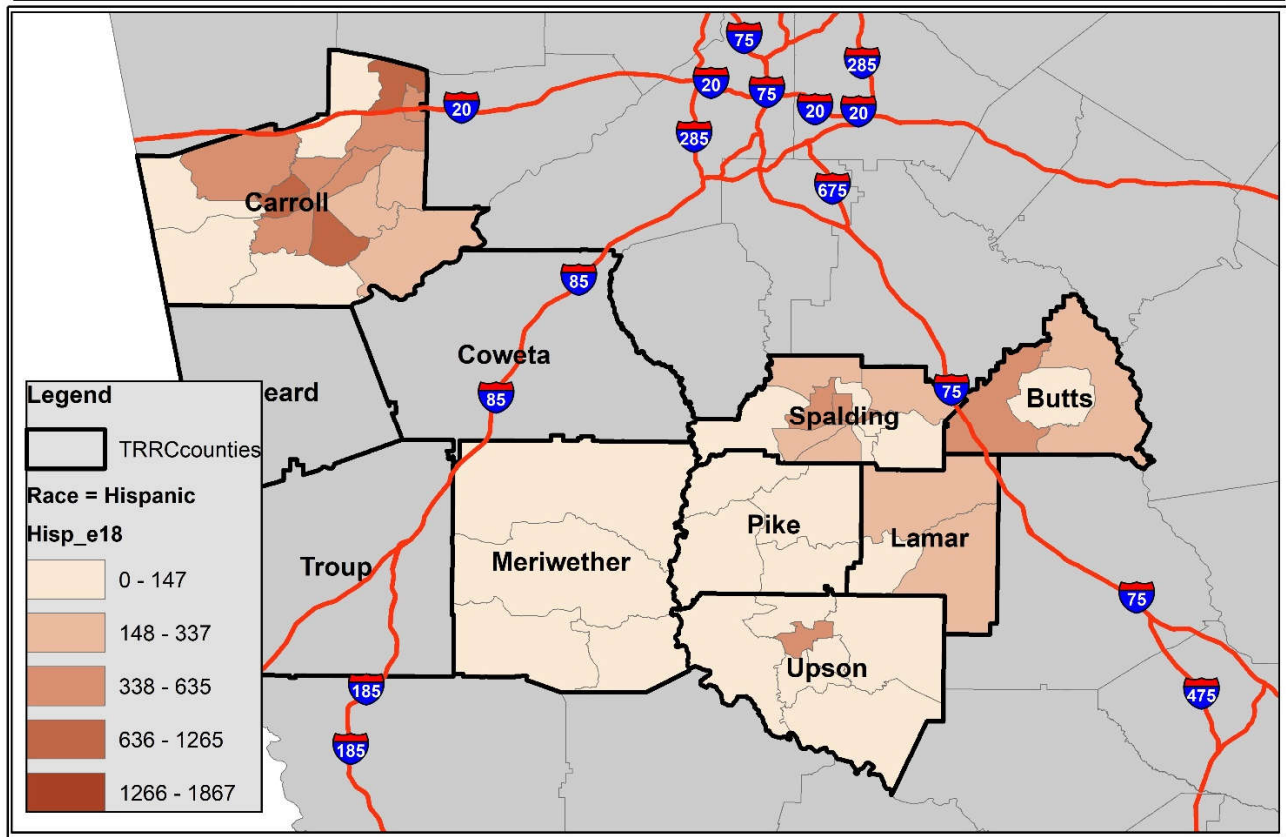
Demographic Maps

Distribution of Spanish Speaking Population Who Speak English Less Than “Very Well”



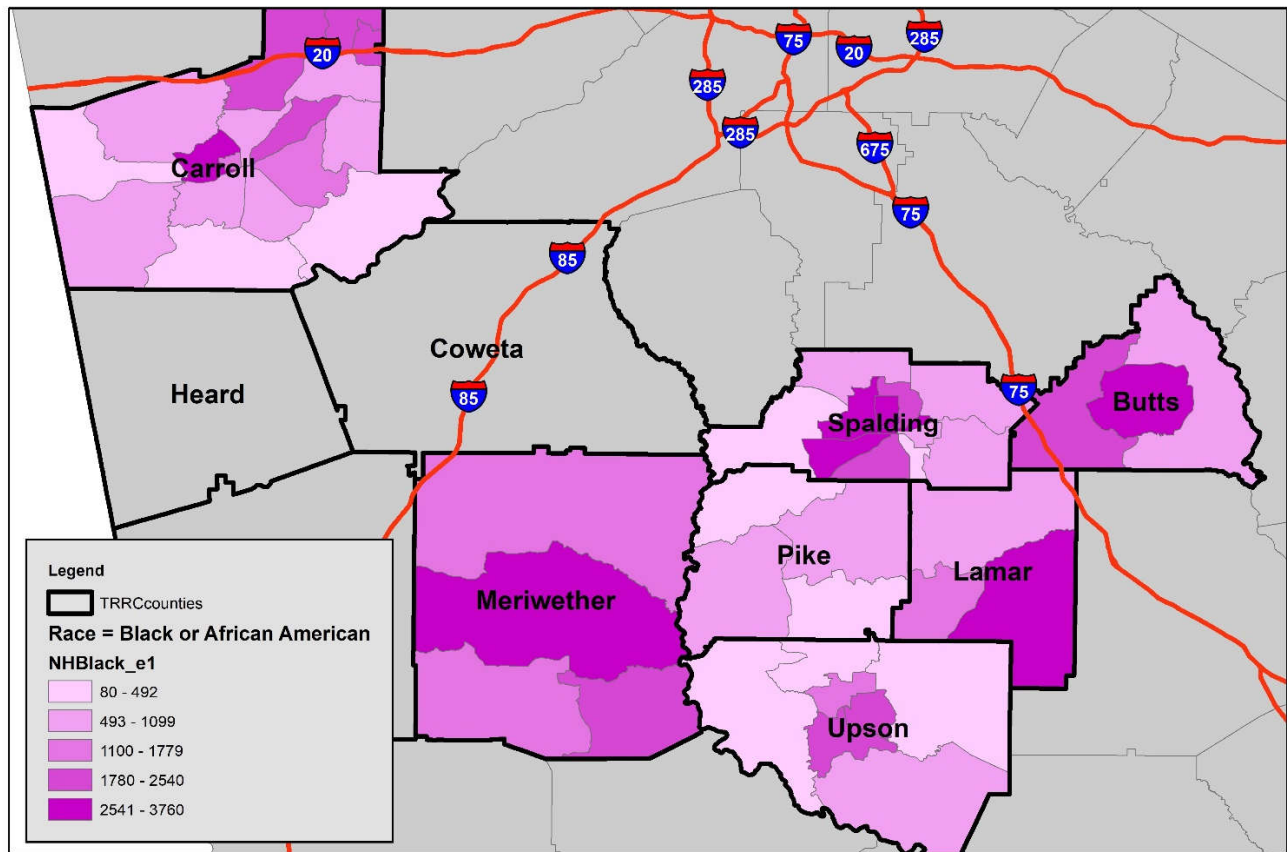
Source: Census, American Community Survey 2018

Distribution of Hispanic Population



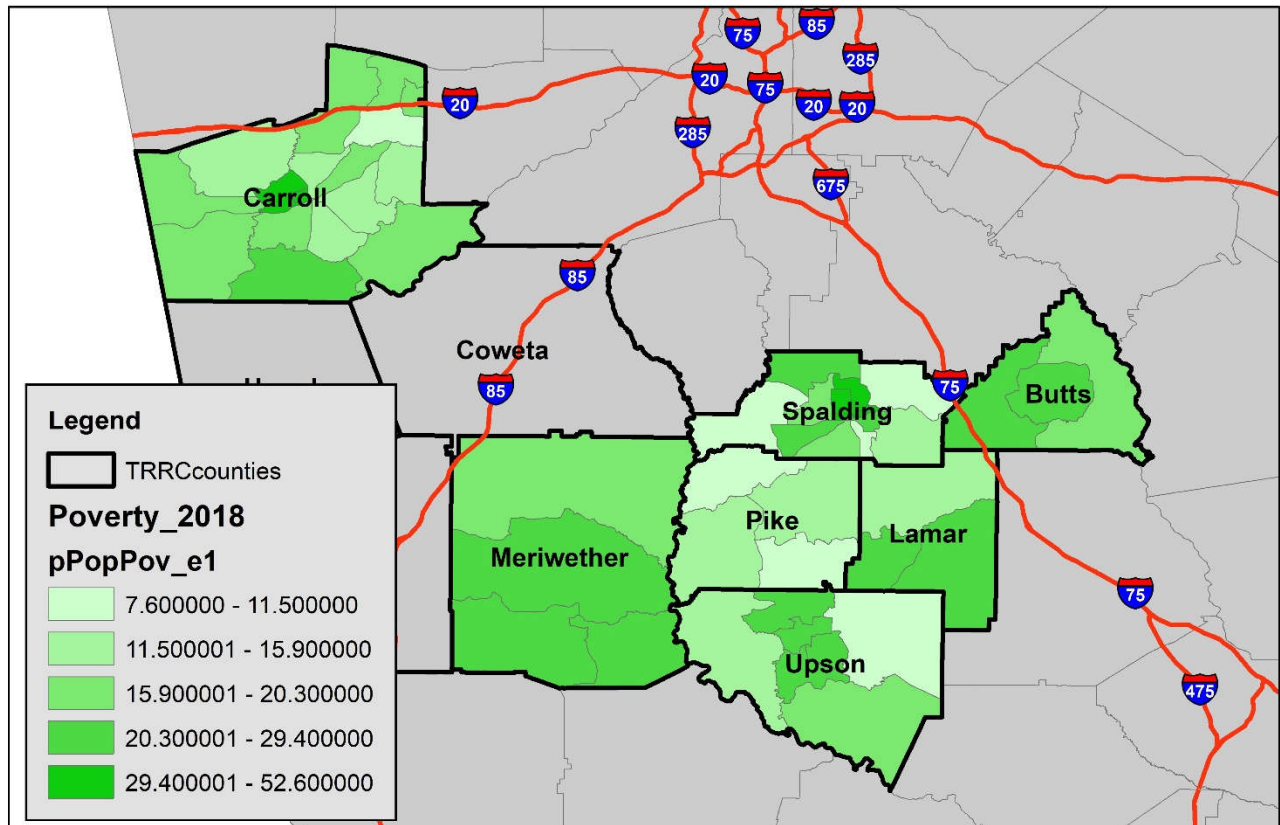
Source: Census, American Community Survey 2018

Distribution of Black or African American Population



Source: Census, American Community Survey 2018

Distribution of Population At or Below Poverty



Source: Census, American Community Survey 2018

Appendix J

Title VI Equity Analysis

Title VI Equity Analysis for Service Area

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.”

As of June 30, 2021, TRRC does not own or operate any transit facilities and no Title VI Fixed Facility Equity Analyses have been completed.

Purpose and need for the facility:

N/A at this time

Alternative locations considered:

Not Applicable – TRRC will not be building alternative Locations

Equity impacts of sitting alternatives:

No Action Alternative