



TITLE VI PROGRAM

For the Hilton Head,
Bluffton, Beaufort County
Urbanized Area
May 2023

Issued By:
Lowcountry Regional Transportation Authority
Palmetto Breeze
P.O. Box 2029
Bluffton, SC 29910

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INTRODUCTION

This program reflects the Lowcountry Regional Transportation Authority's (LRTA), dba Palmetto Breeze, commitment to ensuring that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by LRTA.

A governing Board of appointed members oversees LRTA's operation. There are two Caucasian females, two African American males, one Pacific Island female and one white male on the LRTA Board currently. A copy of the resolution approving the Title VI Program, as adopted by the public entity, is attached.

	Board Member	Position	County
African American Male	Charles Mitchell	Chair	Jasper
Pacific Island Female	Barbara Childs	Vice- Chair	Beaufort
African American Male	William Robinson	Member	Allendale
Caucasian Male	Arthur Handman	Member	Beaufort
Caucasian Female	Laura Atkinson	Member	Hampton
Vacant	Vacant	Member	Beaufort
Vacant	Vacant	Member	Colleton
Vacant	Vacant	Member	Colleton
Caucasian Female	Stephanie Rossi	Ex- Officio Member	LCOG

LRTA, a primary recipient/grantee, operates commuter service, demand response deviated service, fixed route, ADA paratransit, and coordinated service within five counties to include; Allendale, Beaufort, Colleton, Hampton and Jasper. There are seven commuter routes, four demand response routes (deviated service), three fixed routes, ADA service, and four coordinated service routes available on a scheduled basis, to all transit users. LRTA operates 29 buses in peak service. The population of each UZA is less than 200,000.

1.0 TITLE VI NOTICE TO THE PUBLIC

1.1 Notice to the Public

LRTA's Annual Title VI Certifications and Assurances are current. The annual certificate of assurances submission was filed with the Federal Transit Administration (FTA) on February 7, 2023.

Copies of the most recently updated versions of the public notices are included as Attachment A. Notices are published on the LRTA website, in all printed materials, and posted in the buses, station, and office reception area.

2.0 TITLE VI COMPLAINT PROCEDURES

LRTA is committed to ensuring that no person shall on the grounds of race, color, or national origin, as provided by Title VI, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. The objectives of Title VI for FTA funding recipients are:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority or low-income populations; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

Any person who believes that s/he, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin by LRTA may file a complaint by completing and submitting the LRTA Title VI Complaint Form or submit a complaint in writing to the LRTA Title VI Coordinator. LRTA investigates complaints received no more than 180 days after the alleged incident. The complaint form is available at the address below.

2.1 Filing a Complaint

To file a Title VI discrimination complaint, send a completed LRTA Title VI Civil Rights Complaint Form (see Attachment B) to: Lowcountry Regional Transportation Authority, Kristine Hepburn, Director of Finance and Administration, Title VI Coordinator/Civil Rights Officer, P.O. Box 2029, Bluffton SC 29910. A complaint must be filed within 180 days of the alleged incident.

Once a complaint is received, the Title VI Coordinator will investigate the complaint and make a determination as to the nature and validity of the complaint. Investigation of the complaint will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrence, and names of any witnesses. The customer will be notified in writing of the result and determination of the investigation.

If the complainant is not satisfied with the resolution, an appeal process is available. An appeal request for review of a determination of unlawful denial of access or accommodation to public transportation must be filed, in writing, with 60 days of the original determination. The written appeal must include the customer's name, address, and telephone number. A statement of reason(s) why the appellant believes the denial of accommodation request or access to public transportation was inappropriate is recommended.

The Executive Director will set a mutually agreed upon time and place for the review process with the appellant and/or representative within 30 days of the request. The appellant can waive personal appearance in preference of a phone review followed by a written determination. The appellant may submit documents or other information to be included with the record and considered in the review process. Anyone needing special accommodations may contact the LRTA Title VI coordinator at 843-757-5784 for assistance.

The right of an appellant to a prompt and equitable resolution of the complaint must not be impaired by the appellant's pursuit of other remedies, such as filing a complaint with the Department of Justice or other appropriate federal agency or filing of suit in a state or federal court. Use of this procedure is not a prerequisite to the pursuit of other remedies.

2.2 Record of Investigations, Complaints, or Lawsuits

A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA. Records will be maintained and be available for compliance review audits. The below table lists the transit-related Title VI investigations, complaints, and lawsuits:

Complainant Name	Complainant Address	Date Filed	Basis	Status	Disposition
Over the reporting period, LRTA had no Title VI complaints, investigations, or lawsuits filed.					

3.0 LRTA LIMITED ENGLISH PROFICIENCY OUTREACH PLAN

3.1 Introduction

This *Language Assistance Plan (LAP)* is a resource tool that will serve as a guide in addressing responsibilities as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT) concerning the needs of individuals with limited English language skills. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any DOT-assisted program or activity because they face challenges communicating in English.

Most individuals living in the United States of America read, write, speak, and understand English. For some, English is not their primary language. For instance, according to the 2020 census, over 41.3 million individuals 5 years and older speak Spanish, 11.8 million speak an Indo-European Language, and over 10.9 million speak an Asian or Pacific Island language at home.

A number of these individuals have little or no trouble with the English language. However, others have a limited ability to read, write, speak, or understand English and are considered to be "Limited English Proficient" persons, or "LEP" persons. According to the 2020 U.S. Census, South Carolina has over 389,000 individuals (7.6% of the State's population) speak a language other than English at home. Of this number, almost 132,000 individuals speak English less than "very well".

3.2 Basis of Authority

Discrimination against a person because of their limited ability to use the English language is a form of national origin discrimination, which is prohibited by Title VI of the Civil Rights Act of 1964. Executive Order 13166 *"Improving Access to Services for Persons With Limited English Proficiency,"* reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation to ensure discrimination does not occur.

Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled *"Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency."* (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance).

The USDOT issued policy guidance, *"DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries"* to clarify the responsibilities of recipients of federal financial assistance and to ensure compliance with LEP regulations. These regulations impact agencies, including the

Lowcountry Regional Transportation Authority (LRTA), private and non-profit entities, and other subrecipients of DOT-assisted funding.

3.3 Plan Summary

LRTA has developed a *Language Assistance Plan (LAP)* to help identify reasonable steps to provide language assistance for persons seeking meaningful access to LRTA services as required by Executive Order 13166.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the approach for training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing this plan, LRTA undertook the U.S. Department of Transportation four-factor LEP analysis which considers the following:

1. The number or proportion of LEP persons in the LRTA service area who may be served or likely to encounter an LRTA program;
2. The frequency with which LEP individuals come in contact with LRTA services;
3. The nature and importance of the program, activity or service provided by the LRTA to the LEP population; and
4. The resources available to the LRTA and overall cost to provide LEP assistance.

A brief description of these considerations is provided in the following section.

3.4 Four Factor Analysis

1. The number or proportion of LEP persons in the LRTA service area who may be served or likely to encounter an LRTA program, activity, or service.

At the time of the 2020 Census, South Carolina’s population was 5,118,425. In assessing the population by ethnic background, the Hispanic/Latino population ranks highest with reported representation at 235,682 (5.1%) persons, of which 119,030 spoke Spanish at home.

With regard to the ability to speak English, 234,998 persons reported that they spoke English “Less than very well”. Of this number, Spanish- speaking individuals accounted for over 41% (96,437). Other languages spoken by LEP individuals include:

<u>Language</u>	<u>Population</u>	<u>LEP</u>
• Indo-European	58,067	16,357
• Asian and Pacific Islander	40,058	22,891
• Other Languages	13,556	2,484

Individuals who have identified themselves as speaking English less than “very well” are considered to be limited English proficient based on their limited ability to read, write, speak or understand English. This deficiency makes it difficult for them to have meaningful access to programs that may be offered by the department.

The Hispanic/Latino group makes up approximately five percent of the State’s total population. Since it is the largest LEP group in South Carolina, all service requests have been related to Spanish. Therefore, the Authority’s focus will be on targeting this community. Language assistance is available to other limited English speaking individuals in the community as the need arises.

2. The frequency with which LEP individuals come in contact with an LRTA program, activity or service.

Contact with LEP individuals can be described as moderate. During 2022, the Authority received approximately 70 requests for language assistance.

At present, LRTA has no documented evidence or history that any requests for assistance relate to the application/interview process. In addition to this, no determination can be made as to why there are so few requests; however, additional efforts will be made to ensure that the authority's customers are aware of services that are available.

3. The nature and importance of the program, activity, or service provided by the LRTA to the LEP community.

LRTA's most critical services are those related to public transportation, public involvement (public information or planning meetings), and the ability to file complaints.

LRTA will continue assessing this area by communicating with community organizations that serve LEP persons, as well as with LEP persons. With regard to public transportation, LRTA will monitor use by LEP persons to determine whether some particular routes or modes of transportation are more important to the LEP population.

4. The resources available to the LRTA and overall costs.

LRTA's primary resource is its fluent bi-lingual employees. These employees have successfully handled all requests for assistance. In addition, LRTA is utilizing an "on demand" telephone translation service when necessary. At present, cost has not been a deterrent or imposition to the department's ability to provide LEP services to department customers. In situations where Department employees cannot or should not provide services, i.e., an unfamiliar language or dialect, a legal matter or need for expert testimony, LRTA will utilize the "on demand" telephone translation services.

LANGUAGE ASSISTANCE MEASURES

LRTA will be responsible for ensuring that their program area and staff are familiar with these measures:

A. Type of Language Services Available

The type of language services available by the department include:

- i. Bilingual staffing
- ii. Translation services, as needed
- iii. Use of "I Speak" flashcards to identify languages. These cards can be downloaded at <https://www.lep.gov/ISpeakCards2004.pdf> and are maintained by the Title VI Designees.

B. How Recipients Can Obtain Services

When utilizing LRTA employees, consideration will be given in regards to the individual's workload, availability, and supervisor's consent. Employees who provide language services do so strictly on a voluntary basis and receive no remuneration. The "on demand" translation service is available at any time that the services are necessary.

Additionally, the Title VI complaint form is on the LRTA website in both English and Spanish as well as on printed material to assist LEP individuals in understanding their rights under Title VI.

C. How to Respond to LEP Callers

LRTA personnel, including those who regularly take calls from the general public, will forward LEP calls to the appropriate employee volunteer. The employee volunteer will record the date and time of the call, name of caller, language (if it can be determined), nature of call and disposition. If a bi-lingual employee is unavailable, the caller will be put on hold, and a call will be made to the translation service. The caller will then be connected to a translator and a conference call will be conducted between the LEP person, the staff member and the translator.

D. How to Respond to Written Communications from LEP Persons

LRTA personnel who receive written communications from LEP individuals will contact the Civil Rights Officer who in turn will record the date of receipt, name of LEP individual, language (if it can be determined), nature of the correspondence, and disposition.

E. How to Respond to LEP Individuals Who Have In-Person Contact with Staff

LRTA personnel who have in-person contact with LEP individuals will address the issues and/or concerns raised. They will record the date of receipt, name of LEP individual, language (if it can be determined through familiarity with the language, use of "I Speak" cards, etc.), nature of the correspondence, and disposition of the encounter and forward the information to the appropriate Civil Rights Officer. In cases where language barriers cannot be overcome, personnel will contact the Civil Rights Officer.

F. How to Ensure Competency of Interpreters and Translation Services

LRTA will ensure, to the greatest extent possible, the competency of interpreter and translation services. Applicable directives will be observed when selecting consultants for service. Employees who serve as interpreters and/or translators will be required to attest:

- Their ability to communicate or translate information accurately in both English and the other language;
- That they will not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translating;
- That they do not have a conflict of interest on the issues they would be providing

services.

G. LRTA Staff Training

LRTA staff that has Title VI responsibilities will continue to attend Title VI seminars and workshops on an annual basis. Also, LRTA will seek the assistance of FHWA in training Title VI Designees and subrecipients. Staff will be provided a copy of the LEP Plan and educated on procedures. Suggested training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities
- What language assistance services the LRTA offers?
- Use of LEP “I Speak Cards”
- How to use the interpretation and translation services
- Documentation of language assistance requests
- How to handle a Title VI and/or LEP complaint

H. Outreach Techniques

LRTA does not have a formal practice of outreach techniques due to the small LEP population and resources available. However, the following are a few options that the LRTA will incorporate if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”.
- Key printed materials, including but not limited to schedules and maps, will be translated and made available at transit centers, on board vehicles and in communities where a concentrated LEP population is identified.

I. Monitoring and Updating the Language Assistance Plan

This plan is designed to be flexible and easily updated. LRTA will update this plan by obtaining data from other sources, such as other state and local government agencies (i.e., Commission on Minority Affairs, Departments of Social Services (DSS) and Education, and Regional Transit Authorities (RTAs), Metropolitan Planning Organizations (MPOs), and Councils of Government (COGs), as well as organizations that serve LEP persons.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in South Carolina?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified LRTA programs? Are there other programs that should be included?
- Have LRTA's available resources, such as technology, staff, and financial costs changed?
- Has LRTA fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

J. Dissemination of the LRTA Language Assistance Plan

The **Language Assistance Plan (LAP)** Plan will be shared with Title VI Designees and senior management. Also, LRTA will include the LEP plan on the LRTA website together with its Title VI Policy and Complaint Procedures. Copies of this Plan will be provided upon request. LEP persons may obtain a translated copy of this document upon request.

Any questions or comments regarding this plan should be directed to the LRTA offices.

LOWCOUNTRY REGIONAL TRANSPORTATION AUTHORITY
Civil Rights Officer
PO Box 2029 Bluffton, SC
29910

4.0 NOTIFICATION OF LRTA TITLE VI OBLIGATIONS

Title VI notification is posted on the LRTA website at www.palmettobreezetransit.com and prominently posted in all revenue vehicles.

5.0 ENVIRONMENTAL JUSTICE ANALYSIS OF CONSTRUCTION PROJECTS

LRTA has not engaged in any construction projects in the recent past.

6.0 SUMMARY OF PUBLIC PARTICIPATION EFFORTS

6.1 Public Participation Plan

LRTA seeks to integrate the needs and views of all transit customers, especially those of minority, low-income and LEP populations, people who may have comparatively fewer resources to present their concerns about transit. LRTA offers regular and continuous opportunities for the public to be involved in the agency's planning and operational decisions. Multiple avenues of communication are available to LRTA customers and non-riders of the region. LRTA staff is accessible by telephone, e-mail, and in person. Agency contact information is posted on the website www.palmettobreezetransit.com, on transit vehicles, and in all publications. LRTA strives to hold all public meetings in transit accessible locations or offers transportation if it is not accessible

by transit, with notices posted on vehicles and the agency's website. LRTA also utilizes local media (e.g., newspapers, television stations, websites, etc.) to publicize public meetings and events.

The public activities were geared to provide meaningful opportunities for the residents of the LRTA service area to participate in aspects of transit planning and service for which the authority is responsible.

The actions that LRTA have taken to ensure that minority and low-income people of the service region had meaningful access to transit services include:

1. Deployment of LRTA's Limited English Proficiency (LEP) Plan
2. Providing of a bilingual customer service staff member (English and Spanish)
3. Translation of official LRTA notices in Spanish

When a major fare increase or service change is proposed, LRTA notifies the public via press releases sent to all local newspapers, the project website and various social media outlets such as Facebook. The release is also sent to local elected officials to share with constituents. This notice will invite the public to attend a hearing to discuss the service changes proposed and ask for comments. The notice also states that those unable to attend may submit a written statement on the service changes and these comments will be considered along with the comments from the public hearing in selecting the final modifications to the service. These hearings are conducted locally during the hours when bus service is operated so that those willing to attend the meeting will have transportation to and from the meeting. Accommodations are made for those individuals wishing to attend, but may not be able to travel to the hearing.

LRTA also posts flyers on buses and drivers hand out the flyers to passengers informing them of a hearing, service change or fare increase. This flyer also invites the passengers to submit comments, oral or written, prior to the hearing. These flyers are distributed at least one week prior to a hearing or change.

When submitting grants to the FTA for approval, LRTA publishes the program of projects in the newspaper that lists all federal planning, operating and capital requests that will be contained in the grant application. The public is welcome to submit comments on the projects or request a public hearing to discuss the grant application.

6.2 Approach to Public Involvement

The ultimate goal of public involvement is to provide opportunities for members of the public to influence the LRTA and its policies and priorities. Clarifying how, when and to what extent they can influence the outcome will be part of ongoing communication.

LRTA embraces and believes in the Practice of Public Participation, which outlines a number of ways to identify and involve people in ways that are effective and meaningful. Because there are so many people affected by transportation services, it is important to identify and engage individuals and organizations that represent a wide variety of experiences and perspectives on transportation. These can range from individuals who rely exclusively on public transit to business owners concerned about access and congestion.

6.3 Public Participation:

Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.

Public participation includes the promise that the public's contribution will influence the decision.

Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.

Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.

Public participation seeks input from participants in designing how they participate.

Public participation provides participants with the information they need to participate in a meaningful way.

Public participation communicates to participants how their input affected the decision.

The following sections describe the many different levels of public involvement that will be included in the long-range transportation planning process.

Identifying and Informing Stakeholders

A stakeholder is someone who has something at stake. In this case, stakeholders include people who are affected by how, when and where transportation investment occurs. Stakeholders may include people who have some direct involvement in the transportation system or they may simply be a user or beneficiary of transportation services (e.g., a commuter). In order to participate in the planning process, stakeholders must be aware that the planning process is occurring. Much of this effort will occur at the beginning of the planning process, though it will also occur intermittently throughout the process.

The planning process will include a number of milestones where the public must be informed about opportunities to influence the direction of the planning process and its eventual outcomes. Because of competing demands on people's time and attention, as well as different communication styles and comfort levels, communication strategies must be varied. A direct mailing might be appropriate to some people, for example, while personal contact may be required to reach others.

6.4 Working List of Stakeholder Groups

Tools and techniques to inform stakeholders include the following. Each of these efforts will be documented:

1. Newsletter
2. Media release
3. Targeted mailing
4. Project web site
5. E-Mail distribution list
6. In-person briefings (e.g., public officials, boards of civic organizations)
7. Informal networks of contacts
8. Frequently Asked Questions resource (print and web)

Consulting with Stakeholders

Another level of public involvement involves consultation. The general public and various stakeholders are important sources of information and feedback. This includes information on transportation conditions; the experiences, needs, and desires of transportation users; and the expectations, concerns or wishes about the future. In reviewing products from the planning process, stakeholders will let us know whether or not what is presented reflects their understanding and objectives.

Tools and techniques to consult with stakeholders include the following:

1. Information about operations, physical conditions and trends from transportation providers
2. General public opinion survey (by telephone)
3. Survey of employees at large employers (written)
4. Transit user survey (in person)
5. Special presentations/feedback sessions (e.g., public officials, boards of civic organizations)
6. E-mail and written correspondence to project manager
7. Feedback from materials reviewed at public meetings, on-line, on the vehicles and at the facility.

Direct Stakeholder Involvement

Direct involvement of stakeholders means working more closely with them during the process to ensure the concerns and objectives are understood and fully considered. The emphasis of these activities is that the LRTA is committed to working with these groups to seriously consider, if not incorporate, the objectives of these groups.

Key Stakeholder Collaboration

Collaboration means partnering with key agencies, employers and service providers in this update to the Transportation Plan. Formulating the plan's ultimate recommendations and policies together will ensure that the vision of the LRTA is realistic, supported by each agency, and reflects a long-term vision informed by public participation. Primary means of this collaboration will include working sessions of the LRTA. Representatives of the general public (e.g., transit riders, civic groups, business organizations) may be specifically asked to participate in these sessions in some way to ensure that these voices are heard.

6.5 Milestones/Work Tasks

The LRTA planning process includes a number of work tasks with milestones associated with them. Major milestones and public involvement phases are indicated below:

Major Milestones

1. Launch of major public input and consultation initiatives
2. Completion of transportation inventory and analysis
3. Survey results
4. Release of draft investment/development scenario
5. Release of draft policies, recommendations and priorities

Public Involvement Phases

1. Finalize Public Involvement Plan
2. Continue to develop the list of stakeholders and refine techniques to target these groups
3. Public input on transportation issues, problems, opportunities and objectives
4. Review and input with regard to transportation inventory and analysis

Transportation Inventory and Analysis

1. Inventory and analysis of existing transportation system and its maintenance and performance
2. Transportation safety and security analysis
3. Inventory and analysis of environmental considerations
4. Identification of existing and future operations and management strategies
5. Review the cost effectiveness of alternatives to solve transportation network deficiencies
6. Impact and service level analysis for disadvantaged populations
7. Environmental resource mapping

Development of Policies, Recommendations and Priorities

1. Update goals and objectives
2. Develop evaluation criteria to guide the screening of long-range investment alternatives
3. Develop performance criteria
4. Review and evaluation of funding alternatives, financial coordination, and implementation strategies
5. Development of short, medium and long range transportation priorities
6. Future land use recommendations
7. Future roadway recommendations and functional role
8. Pedestrian and bicycle recommendations
9. Transit system recommendations
10. Environmental mitigation plan

6.6 Stakeholders

This inventory of stakeholders is not organized by order of importance. A more detailed inventory of stakeholders and contact information will be kept on file and updated on an ongoing basis. This will include

information on the needs of the stakeholder related to dissemination of information, how best to involve them, and contacts that occur.

Area Residents	Human Services Organizations
Beaufort County	County Disability and Special Needs
Jasper County	County Senior Centers
Hampton County	Institutions and Large Trip Generators
Colleton County	University of South Carolina
Allendale County	Technical College of the Lowcountry
Town of Hilton Head	Public Officials
Town of Bluffton	Town and County Managers and Staff
Racial/ethnic minority groups	Transportation System Users
Low income residents/households	Bicyclists
Businesses and Business Organizations	Pedestrians
Beaufort Chamber of Commerce	Car drivers
Hilton Head /Bluffton Chamber	Transit riders
Hotels and Resorts	Transit "dependent" individuals

Economic Dev & Planning Authorities	Transportation Agencies
Lowcountry Council of Government	SCDOT
Elected Officials	Civic and Booster Organizations
City Council and Mayors	Rotary Clubs
Planning Commissions	
State Legislators	
Transportation and Public Works Committees	

6.7 Efforts Since Last Submittal

LRTA has engaged in the following public outreach and involvement efforts to engage Title VI and LEP community members:

1. Distribution of marketing materials in Spanish.
2. Hiring a bilingual staff member who answers the main scheduling line.
3. Deployment of social media outreach strategy.

7.0 SYSTEM WIDE SERVICE STANDARDS/POLICIES

7.1 Vehicle Load

LRTA's revenue fleet consists of several vehicle types. The fleet consists of: MCI Commuter coaches, Cutaway buses, and vans. LRTA monitors the "vehicle capacity" in several ways. First, LRTA's Operations Manager periodically reviews vehicle 100% passenger counts. These counts are performed daily throughout the year.

Second, LRTA considers information relayed from passengers and operators. Based on the comments, LRTA will send a supervisor or the Operations Manager to observe the extent of the overcrowding. If the load exceeds capacity, a tripper bus is deployed when necessary and the route is identified for future service changes.

7.2 Vehicle Headway

LRTA operates commuter services from the outlying counties to Bluffton and Hilton Head. Currently, the service provided entails one morning trip and one late afternoon return trip. As such, there is not a concern with headways on this service. The demand response deviated service also operates in a similar manner. The seasonal service provided in the Hilton Head urbanized area operates on a 30-minute headway for all areas served. It has been determined that excessive headways would not provide the residents of the MPO area with a quality transit service, therefore any additional services will be designed with adequate headways.

7.3 On-Time Performance

An operator must never leave timed stops early and must arrive at destinations at published times to be considered on time. The service standard is 90 percent on-time performance. Supervisors provide daily time checks to the Operations Manager who submits the data for monitoring. Any infractions are handled according LRTA's discipline policy outlined in the operator handbook.

Historically, LRTA runs at better than 95% on-time.

7.4 Service Availability

LRTA determined that through the currently operated demand response deviated route, coordinated services, and the commuter routes, transit service is available to 100 percent of the MPO area where residents live and work. Parks, agricultural land and water bodies were not included in this calculation. After examining this coverage, LRTA formulated the following policy for service criteria.

LRTA has regular scheduled commuter transit service and demand response deviated service available within the MPO Urbanized area.

7.5 Transit Amenities and Vehicle Assignments

Transit amenities availability and vehicle assignments are determined based on the characteristics of the respective routes, including ridership and length of trip. All vehicles are equipped with air conditioning and basic amenities. Forty-foot motor coaches are used on the commuter bus routes based on the length of trip and amount of ridership, while smaller buses are used for local routes.

8.0 CERTIFICATIONS AND ASSURANCES

8.1 Non-Discrimination

Lowcountry Regional Transportation Authority (LRTA) is committed to ensuring that no person is excluded from participation in, or denied benefits of its services on the basis of race, color, creed, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

9.0 TRANSIT SECURITY

LRTA transit security measures are employed on board vehicles and at transit facilities. Following is a summary of these measures.

Transit customer security measures include:

1. Video cameras and audio recording on most revenue vehicles with all new vehicles ordered with the video and audio systems
2. Vehicle operator training on safety practices and conflict-resolution techniques
3. Direct onboard radio communication to LRTA dispatch by way of tablets and Motorola two-way radios

4. Road supervisors patrol routes to improve response time to incidents and assist vehicle operators
5. All safety sensitive personnel attend monthly safety meetings dealing with pertinent topics
6. AVL and emergency locator on each vehicle that utilizes the Syncromatics platform

Security measures at LRTA facilities include:

1. Security cameras and 24-hour surveillance of Maintenance shop, Office areas, and Transfer Center.
2. LRTA Administration and Maintenance facility is fully fenced.
3. All employees have identification cards that also act as door entry cards.
4. Access control (key pad) at rear entrance to LRTA Administration Building

10.0 SUBRECIPIENT MONITORING AND ASSISTANCE

Lowcountry Regional Transportation Authority (LRTA) is committed to ensuring that no person is excluded from participation in, or denied benefits of its services on the basis of race, color, creed, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

LRTA is required to review subrecipients such as cities, counties, college/universities, contractor’s and consultants. Reviews will assess and evaluate a subrecipient’s adherence to civil rights and equal opportunity policies, procedures and practices.

10.1 Types of Compliance Reviews

At its discretion, LRTA may conduct either a subrecipient agency review or a program review. LRTA will be guided by Federal statutes, Executive Orders and regulations. Reviews will consist of a “desk audit” or an “on-site review”. A desk audit is a review of the documentation submitted to LRTA by the subrecipient. Desk audits may be extended to include an on-site review if numerous deficiencies are identified. On-Site Reviews will consist of, but not be limited to, recommendations for corrective actions, technical assistance, and compliance on future federal-aid projects.

10.2 Elements of Compliance Review

1. Regardless of the type of compliance review, LRTA will cover, at minimum, the following areas:
2. Civil Rights Resources
3. Training for Civil Rights Professionals and Others
4. Public Notification and Outreach
5. Data Collection Systems
6. Complaints Processing in Conducted Programs
7. Service to LEP Persons
8. Local Planning and Advisory Committees and Boards
9. Program Delivery
10. Contracting Opportunities

10.3 Civil Rights Resources

Agencies should dedicate sufficient resources to administer their civil rights responsibilities. During compliance reviews, these resources will be identified by staff hours/full time equivalencies and budget allocations.

10.4 Training for Civil Rights Professionals and Others

Agencies must take the necessary steps to ensure civil rights professionals and officials who are responsible for integrating civil rights requirements into programs and activities receive the technical training necessary to properly carry out their responsibilities. During compliance reviews, it will be ascertained:

1. Who has received training by title, level of authority, race, color, and national origin; 2) The subject matter covered and the number of hours of training received;

2. The existence or absence of training needs inventories, employee development plans or other documents that identify the need for the requisite civil rights training;
3. The process used to provide civil rights technical training to new employees or employees new to technical responsibilities in the civil rights area; and
4. The role of national, regional and other civil rights offices within the agency in identifying and validating the need for specific civil rights training.

10.5 Public Notification and Outreach

Agencies must have in place an effective public notification system that adequately informs applicants and participants of the availability of programs, benefits and services. It should also include SCDOT's policy of nondiscrimination, and procedures for filing a discrimination complaint. Effective public notification and outreach systems should include:

1. Nondiscrimination statements printed on all publications and outreach materials providing information to the public;
2. Photographic and outreach materials that display diversity of participants and staff; and
3. Evidence of outreach and linkages to grassroots organizations, advocacy groups and referral sources representing members of protected classes.

10.6 Data Collection Systems

Agencies must develop, implement and maintain data collection systems that yield accurate, relevant and reliable statistical information. The systems will be used to identify:

1. Composition of service areas by race, color, and national origin;
2. Total number of applicants and program participants in programs, activities and specific services or benefits, as appropriate, by race, color, and national origin;
3. Nominations and memberships, by race, color, and national origin, on local and national planning and advisory boards and committees;
4. Data on service areas where LEP persons reside, including:
5. Primary language of each LEP group;
6. Estimated number of persons in each LEP group; and
7. Total number of agency staff who are bilingual in the identified LEP languages and the number and position of such staff by each LEP language identified.

10.7 Service to LEP Persons

LRTA at all levels, has an affirmative responsibility pursuant to Executive Order 13166 to provide LEP persons with meaningful opportunities to participate in programs and activities conducted by LRTA. During compliance reviews, it will be ascertained what actions have been taken (or are planned) to communicate with and assist individuals with LEP and other special needs. During compliance reviews, LRTA will verify if:

1. Agencies and/or their sub-components have in place, strategies, processes, and/or procedures that ensure:
 - a. Thorough assessment of the language needs of the population to be served;
 - b. Effectuation of a comprehensive written communications policy and plan on LEP assistance;
 - c. Staff training to increase understanding and capability to carry out the policy effectively; and
 - d. Vigilant monitoring to ensure LEP persons can meaningfully access programs and activities.
2. In assessing the above information, reviewers will validate whether or not LEP persons are:
 - a. Receiving adequate information on programs and activities;

- b. Able to effectively communicate the relevant circumstances of their situations to agency officials;
- c. Able to understand the services and benefits available; and
- d. Able to receive the services and benefits for which they are eligible.

10.8 Local Planning and Advisory Committees and Boards

Agencies should diversify internal and external advisory boards and committees. During compliance reviews, the internal and external planning and advisory committees should be reviewed. Some of the factors that should be considered are:

1. Efforts to solicit diverse nominations for committees and advisory boards;
2. The selection and appointment process used to staff committees and advisory boards;
3. Any qualifying mandatory or discretionary membership criteria that are imposed internally and externally and their impact on diversity;
4. Efforts to remove or revise discretionary criteria where their impact has been negative or adverse; and
5. Any other factors that affect planning and advisory committee membership.

10.9 Program Delivery and Contracting Opportunities

Agencies are required to ensure nondiscrimination in its conducted programs and activities, including those affecting minorities, women, and Native American tribes, thereby improving service delivery to historically under-served populations. In addition, agencies are required to ensure equal opportunity for minority, women-owned, small and disadvantaged business in all USDOT contracting activities. Compliance reviews should, in the context of effective planning and program delivery, review:

1. Program delivery and contracting priorities, goals and benchmarks, qualitative and quantitative change(s) anticipated and qualitative and quantitative change(s) accomplished;
2. Barrier removal; and
3. Contracting, consulting or other relations either directly or indirectly, i.e., through another institution of higher learning or research organization.

10.10 Sub-recipient Compliance Review Process

1. A notification packet will be sent to the subrecipient notifying them of the review thirty (30) calendar days prior to the review.
2. The notification packet will include the following:
 - a. Notification letter which will include the date the information must be submitted to LRTA.
 - b. Compliance Review Form which must be completed and submitted along with the required documentation. This information must be received within fifteen (15) calendar days.
3. Upon review of preliminary information, LRTA will determine if an on-site review is required. On-site reviews will be conducted if there are Title VI implications as a result of the preliminary review.
4. If an on-site review is required, LRTA will contact the sub-recipient to schedule the review. A letter confirming the date and time of the review will be sent to the sub-recipient.
5. Within thirty (30) calendar days of the completion of the review, LRTA will issue a Corrective Action Plan (CAP), which will identify any deficiencies and the required corrective action, as appropriate.
6. The sub-recipient must correct any deficiencies within a period not to exceed ninety (90) calendar days.
7. Within thirty (30) calendar days of receipt of the sub-recipient response, a letter will be issued regarding if the applicable requirements have been met.
8. If the requirements have not been met, LRTA will provide technical assistance and/or seek assistance from FTA in this regard.

ATTACHMENT A

Notifying the Public of Rights Under Title VI

LOWCOUNTRY REGIONAL TRANSPORTATION AUTHORITY

The Lowcountry Regional Transportation Authority (LRTA) 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 LRTA.

For more information on LRTA's civil rights program, and the procedures to file a complaint, contact our Compliance Administrator, Kristine Hepburn, at 843-757-5784; khepburn@palmettobreezetransit.com; visit our administrative office at 25 Benton Field Road, Bluffton, SC 29910. For more information visit www.palmettobreezetransit.com.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 843-757-5782.

Aviso Público Sobre los Derechos Bajo el Título VI

LOWCOUNTRY REGIONAL TRANSPORTATION AUTHORITY

La Autoridad de Transporte Regional del Lowcountry (LRTA) opera sus programas y servicios sin distinción de raza, color u origen nacional de acuerdo con el Título VI de la Ley de los Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante LRTA.

Para obtener más información sobre el programa de Derechos Civiles de LRTA y los procedimientos para presentar una queja, favor de comunicarse con nuestra Administradora de Cumplimiento, Kristine Hepburn, al 843-757-5784; khepburn@palmettobreezetransit.com; o puede visitar nuestra oficina administrativa en 25 Benton Field Road, Bluffton, SC 29910. Para obtener más información, visite www.palmettobreezetransit.com.

Un denunciante puede presentar su queja directamente con la Administración Federal de Tránsito (FTA) ante la Oficina de Derechos Civiles, Atención: Coordinador(a) del Programa del Título VI, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Para información en un otro idioma llame, al 843-757-5782.

ATTACHMENT B



Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Lowcountry Regional Transportation Authority
Kristine Hepburn, Director of Finance and Administration, Title VI Coordinator/Civil Rights Officer
PO Box 2029, Bluffton, South Carolina 29910

You may also call Palmetto Breeze’s offices from at 843-757-5782 or email hcriss@palmettobreezetransit.com

Complainant’s Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone (Home): _____ (Business): _____

Person discriminated against (if other than complainant)

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

What was the discrimination based on? (Check all that apply)

- Race Color National Origin

Date of the incident resulting in discrimination: _____

Describe how you were discriminated against. What happened and who was responsible? For additional space, attach additional sheets of paper or use the back of the form.

What Palmetto Breeze representative(s) is the person alleging involved? _____

Where did the incident take place? Please provide location, bus number, drivers name, etc. _____

Were there witnesses? Please provide their contact information.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone (Home): _____ (Business): _____

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone (Home): _____ (Business): _____

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone (Home): _____ (Business): _____

Did you file this complaint with another federal, state, or local agency; or with a federal or state court?

(Check the appropriate space) Yes No

If you answered yes, check each agency it was filed with:

- Federal Agency Federal Court State Agency
 State Court Local Agency Other

Provide contact person information for the agency you also filed the complaint with:

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Date Filed: _____

Sign the complaint in the space below.

Attach any documents you believe supports your complaint.

Complainant's Signature

Date

ATTACHMENT D

Lowcountry Regional Transportation Authority

“LANGUAGE ASSISTANCE PLAN”



May 2023

Introduction

This *Language Assistance Plan (LAP)* is a resource tool that will serve as a guide in addressing responsibilities as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT) concerning the needs of individuals with limited English language skills. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any DOT-assisted program or activity because they face challenges communicating in English.

Most individuals living in the United States of America read, write, speak, and understand English. For some, English is not their primary language. For instance, according to the 2010 census, over 34.5 million individuals 5 years and older speak Spanish, 10.3 million speak an Indo-European Language, and over 8.3 million speak an Asian or Pacific Island language at home.

A number of these individuals have little or no trouble with the English language. However, others have a limited ability to read, write, speak, or understand English and are considered to be “Limited English Proficient” persons, or “LEP” persons. According to the 2010 U.S. Census, South Carolina has over 278,000 individuals (6.7% of the State’s population) speak a language other than English at home*. Of this number, almost 132,000 individuals speak English less than “very well”.

*Age 5 years and older.

Bases of Authority

Discrimination against a person because of their limited ability to use the English language is a form of national origin discrimination, which is prohibited by Title VI of the Civil Rights Act of 1964. Executive Order 13166 *“Improving Access to Services for Persons With Limited English Proficiency,”* reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation to ensure discrimination does not occur.

Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled *“Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency.”* (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). The USDOT issued policy guidance, *“DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries”* to clarify the responsibilities of recipients of federal financial assistance and to ensure compliance with LEP regulations. These regulations impact agencies, including the Lowcountry Regional Transportation Authority (LRTA), private and non-profit entities, and other subrecipients of DOT-assisted funding.

Plan Summary

LRTA has developed a *Language Assistance Plan (LAP)* to help identify reasonable steps to provide language assistance for persons seeking meaningful access to LRTA services as required by Executive Order 13166.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the approach for training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing this plan, LRTA undertook the U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons in the LRTA service area who may be served or likely to encounter an LRTA program;
- 2) The frequency with which LEP individuals come in contact with LRTA services;
- 3) The nature and importance of the program, activity or service provided by the LRTA to the LEP population; and
- 4) The resources available to the LRTA and overall cost to provide LEP assistance.

A brief description of these considerations is provided in the following section.

FOUR FACTOR ANALYSIS

1. The number or proportion of LEP persons in the LRTA service area who may be served or likely to encounter an LRTA program, activity, or service.

At the time of the 2020 Census, South Carolina’s population was 5,118,425 with those five (5) years and older being counted at 4,914,912. In assessing the population by ethnic background, the Hispanic/Latino population ranks highest with reported representation at 352,838 (6.9%) persons, of which 232,102 spoke Spanish at home.

With regard to the ability to speak English, 127,315 persons reported that they spoke English “Less than very well”. Of this number, Spanish- speaking individuals accounted for over 74% (94,288). Other languages spoken by LEP individuals include:

<u>Language</u>	<u>Population</u>	<u>LEP</u>
• Indo-European	56,197	13,012
• Asian and Pacific Islander	35,097	16,261

- Other Languages 9,053 3,754

Individuals who have identified themselves as speaking English less than “very well” are considered to be limited English proficient based on their limited ability to read, write, speak or understand English. This deficiency makes it difficult for them to have meaningful access to programs that may be offered by the department.

The Hispanic/Latino group makes up approximately seven percent of the State’s total population. Since it is the largest LEP group in South Carolina, all service requests have been related to Spanish. Therefore, the Authority’s focus will be on targeting this community. Language assistance is available to other limited English speaking individuals in the community as the need arises.

2. The frequency with which LEP individuals come in contact with an LRTA program, activity or service.

Contact with LEP individuals can be described as moderate. During 2022, the Authority has received approximately 70 requests for language assistance.

At present, LRTA has no documented evidence or history that any requests for assistance relate to the application/interview process. In addition to this, no determination can be made as to why there are so few requests; however, additional efforts will be made to ensure that the Authority’s customers are aware of services that are available.

3. The nature and importance of the program, activity, or service provided by the LRTA to the LEP community.

LRTA’s most critical services are those related to public transportation, public involvement (public information or planning meetings), and the ability to file complaints.

LRTA will continue assessing this area by communicating with community organizations that serve LEP persons, as well as with LEP persons. With regard to public transportation, LRTA will monitor use by LEP persons to determine whether some particular routes or modes of transportation are more important to the LEP population.

4. The resources available to the LRTA and overall costs.

LRTA’s primary resource is its fluent bi-lingual employees. These employees have successfully handled all requests for assistance. In addition, LRTA is utilizing an “on demand” telephone translation service when necessary. At present, cost has not been a deterrent or imposition to the department’s ability to provide LEP services to department customers.

In situations where Department employees cannot or should not provide services, i.e., an unfamiliar language or dialect, a legal matter or need for expert testimony, LRTA will utilize the “on demand” telephone translation services.

LANGUAGE ASSISTANCE MEASURES

LRTA will be responsible for ensuring that their program area and staff are familiar with these measures:

A. Type of Language Services Available

The type of language services available by the department include:

- Bilingual staffing
- Translation services, as needed
- Use of “I Speak” flashcards to identify languages. These cards can be downloaded at <https://www.lep.gov/ISpeakCards2004.pdf> and are maintained by the Title VI Designees.

B. How Recipients Can Obtain Services

When utilizing LRTA employees, consideration will be given in regards to the individual’s workload, availability, and supervisor’s consent. Employees who provide language services do so strictly on a voluntary basis and receive no remuneration. The “on demand” translation service is available at any time that the services are necessary.

Additionally, the LRTA website and printed material are in both English and Spanish to assist LEP individuals in understanding their rights under Title VI.

C. How to Respond to LEP Callers

LRTA personnel, including those who regularly take calls from the general public, will forward LEP calls to the appropriate employee volunteer. The employee volunteer will record the date and time of the call, name of caller, language (if it can be determined), nature of call and disposition. If a bi-lingual employee is unavailable, the caller will be put on hold, and a call will be made to the translation service. The caller will then be connected to a translator and a conference call will be conducted between the LEP person, the staff member and the translator.

D. How to Respond to Written Communications from LEP Persons

LRTA personnel who receive written communications from LEP individuals will contact the Civil Rights Officer who in turn will record the date of receipt, name of LEP individual, language (if it can be determined), nature of the correspondence, and disposition.

E. How to Respond to LEP Individuals Who Have In-Person Contact with Staff

LRTA personnel who have in-person contact with LEP individuals will address the issues and/or concerns raised. They will record the date of receipt, name of LEP individual,

language (if it can be determined through familiarity with the language, use of “I Speak” cards, etc.), nature of the correspondence, and disposition of the encounter and forward the information to the appropriate Civil Rights Officer. In cases where language barriers cannot be overcome, personnel will contact the Civil Rights Officer.

F. How to Ensure Competency of Interpreters and Translation Services

LRTA will ensure, to the greatest extent possible, the competency of interpreter and translation services. Applicable directives will be observed when selecting consultants for service. Employees who serve as interpreters and/or translators will be required to attest:

- Their ability to communicate or translate information accurately in both English and the other language;
- That they will not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translating;
- That they do not have a conflict of interest on the issues they would be providing services.

G. LRTA Staff Training

LRTA staff that has Title VI responsibilities will continue to attend Title VI seminars and workshops on an annual basis. Also, LRTA will seek the assistance of FHWA in training Title VI Designees and subrecipients. Staff will be provided a copy of the LEP Plan and educated on procedures. Suggested training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities
- What language assistance services the LRTA offers?
- Use of LEP “I Speak Cards”
- How to use the interpretation and translation services
- Documentation of language assistance requests
- How to handle a Title VI and/or LEP complaint

H. Outreach Techniques

LRTA does not have a formal practice of outreach techniques due to the small LEP population and resources available. However, the following are a few options that the LRTA will incorporate if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on

known LEP population in the area.

- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”.
- Key printed materials, including but not limited to schedules and maps, will be translated and made available at transit centers, on board vehicles and in communities where a concentrated LEP population is identified.

I. Monitoring and Updating the Language Assistance Plan

This plan is designed to be flexible and easily updated. However, major updates most likely will not occur until the next Census in 2020 unless the LRTA finds it necessary and crucial for an update before such time.

LRTA will update this plan by obtaining data from other sources, such as other state and local government agencies (i.e., Commission on Minority Affairs, Departments of Social Services (DSS) and Education, and Regional Transit Authorities (RTAs), Metropolitan Planning Organizations (MPOs), and Councils of Government (COGs), as well as organizations that serve LEP persons.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in South Carolina? Each County?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified LRTA programs? Are there other programs that should be included?
- Have LRTA’s available resources, such as technology, staff, and financial costs changed?
- Has LRTA fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

J. Dissemination of the LRTA Language Assistance Plan

The **Language Assistance Plan (LAP)** Plan will be shared with Title VI Designees and senior management. Also, LRTA will include the LEP plan on the LRTA website together with its

Title VI Policy and Complaint Procedures. Copies of this Plan will be provided upon request. LEP persons may obtain a translated copy of this document upon request.

Any questions or comments regarding this plan should be directed to the LRTA offices.

Lowcountry Regional Transportation Authority
Civil Rights Officer
PO Box 2029 Bluffton, SC
29910