

DRAFT

***Federal Transit Administration
Title VI Program***

**COASTAL REGION METROPOLITAN
PLANNING ORGANIZATION**



Adopted on October 23, 2024

Developed in 2009 and Updated in 2016, 2019, 2021, and 2024

Prepared by

The Coastal Region Metropolitan Planning Organization (CORE MPO)

The Chatham County - Savannah Metropolitan Planning Commission (MPC)

P.O. Box 8246, 110 East State Street Savannah, Georgia 31412-8246

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www.thempc.org

(Plan expires 3 years from date approved by the board)

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
2009	Title VI Plan Developed	Wykoda Wang	1 st comprehensive Title VI Plan
2015	Title VI Plan Updated	Wykoda Wang Jane Love	Including updates to all required Title VI components plus Participation Plan, LAP and EJ Plan
1/13/2016	Title VI Concurrence Letter Received	Nancy Cobb, FTA	Required concurrence
3/9/2016	Updated Title VI Plan Adopted by CORE MPO Board	MPO Chairman Al Scott	CORE MPO's official adoption of Title VI Plan
8/24/2016	Title VI Plan Amended	MPO Chairman Al Scott	Revised language regarding complaint procedure
April 2019	Comments received from GDOT on next update	Michele Nystrom	Suggested that MPO change plan format to match GDOT's template
April – August 2019	Title VI Plan updated (including 45-day public review and comment)	Wykoda Wang	Incorporated public participation evaluations since last plan update, newer data, and 2045 MTP development results; Revised plan format to match GDOT's template.
8/7/2019	Updated Title VI Plan adopted by CORE MPO Board	MPO Chairman Al Scott	New three-year update cycle begins.

<p>October 2020- February 2021</p>	<p>Updated the Participation Plan section of Title VI Plan (including a 45-day public review and comment period).</p>	<p>Asia Hernton</p>	<p>The changes in public outreach caused by COVID-19 necessitated an update. The plan was adopted by the CORE MPO on February 24, 2021.</p>
<p>2024</p>		<p>Asia Hernton Anna McQuarrie</p>	

Title VI Plan Table of Contents

The CORE MPO Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval

Title VI Plan Adopted on: (Insert date) _____

Adopted by: The CORE MPO Board

Signature(s): _____

Approval:

Section 2: Title VI Policy Statement

Policy Statement

The Coastal Region Metropolitan Planning Organization (**CORE MPO**), operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Georgia Department of Transportation (GDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and GDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. **CORE MPO** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

CORE MPO

- **CORE MPO** 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 the CORE MPO.
- For more information on **CORE MPO's** civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Asia Hernton, Transportation Planner, Title VI Coordinator

912-651-1456

Email: herntona@thempc.org;

Or visit our administrative office at

110 E State Street, **Savannah, GA, 31401**

For more information, visit www.thempc.org/Core

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

or to

- **Federal Transit Administration, Office of Civil Rights, Director**
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
 - If information is needed in another language, contact **XXX-XXX-XXXX**.
 - Si se necesita información en otro idioma, comuníquese con **XXX-XXX-XXXX**.

The **CORE MPO** Notice to the Public is posted in the following locations:

1. **Savannah Morning News**
2. **Live Oak Library System**
3. **The Chatham-Savannah Metropolitan Planning Commission**

Sample Title VI Notice to the Public in Spanish

Notificación al Público de Derechos Bajo el Título VI

- **CORE MPO** opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con **CORE MPO**.
- Para obtener más información sobre el programa de derechos civiles o los procedimientos para, o a presentar una queja, se pone en contacto con:

Staff Name, Staff Position Coordinador del Título VI

912-651-1456 Click or tap here to enter text.

Correo electrónico: herntona@thempc.org;

O visite a nuestra oficina administrativa en:

110 E State Street, **Savannah, GA, 31401**

Para más información, visite a: www.thempc.org/Core

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

o, a:

- Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Director East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con **XXX-XXX-XXXX**.

Sample Title VI Notice to the Public in Chinese (Mandarin)

通知公众第六章规定的权利

CORE MPO

CORE MPO 根据《民权法案》第六章的规定，在实施项目和提供服务时不考虑种族、肤色和民族血统。任何人如果认为自己受到第六章规定的任何非法歧视性做法的侵害，都可以向 CORE MPO 投诉。

欲了解更多有关 CORE MPO 公民权利计划或《第六章》义务、程序或投诉的信息，请联系：

Asia Hernton, 交通规划师，第六条协调员

912-651-1456

电子邮件：herntona@thempc.org；

或访问我们的行政办公室

110 E State Street, Savannah, GA, 31401

更多信息，请访问 www.thempc.org/Core

对于与交通相关的第 VI 章事宜，也可直接向 GDOT 的平等就业机会办公室投诉：第六章联络员，600 West Peachtree Street N.W. Atlanta, GA 30308; via phone : 404-631-1972; TTY: 711 或发送电子邮件至 civilrights@dot.ga.gov.

或

联邦运输管理局，民权办公室，主任

East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.

如果需要其他语言的信息，请联系 888-446-4511。

Sample Title VI Notice to the Public in Vietnamese

Thông báo cho công chúng về các quyền theo Tiêu đề VI

CORE MPO

CORE MPO vận hành các chương trình và dịch vụ của mình không phân biệt chủng tộc, màu da và nguồn gốc quốc gia theo Tiêu đề VI của Đạo luật Dân quyền. Bất kỳ người nào tin rằng mình đã bị tổn hại bởi bất kỳ hành vi phân biệt đối xử trái pháp luật nào theo Tiêu đề VI đều có thể nộp đơn khiếu nại lên CORE MPO.

Để biết thêm thông tin về chương trình dân quyền của CORE MPO hoặc nghĩa vụ Tiêu đề VI, thủ tục hoặc nộp đơn khiếu nại, vui lòng liên hệ:

Asia Hernton, Người lập kế hoạch vận tải, Điều phối viên Tiêu đề VI
912-651-1456

Email: herntona@thempc.org;

Hoặc ghé thăm văn phòng hành chính của chúng tôi tại
110 E State Street, Savannah, GA, 31401

Để biết thêm thông tin, hãy truy cập www.thempc.org/Core

Đối với các vấn đề liên quan đến Tiêu đề VI giao thông vận tải, bạn cũng có thể nộp đơn khiếu nại trực tiếp đến Văn phòng Cơ hội Việc làm Bình đẳng của GDOT: Liên lạc Tiêu đề VI, 600 West Peachtree Street N.W. Atlanta, GA 30308; qua điện thoại: 404-631-1972; TTY: 711 hoặc email: Civilrights@dot.ga.gov.

hoặc

Cục Quản lý Vận tải Liên bang (FTA), Văn phòng Dân quyền, Giám đốc

East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.

- Nếu cần thông tin bằng ngôn ngữ khác, hãy liên hệ theo số 888-446-4511.

Section 4: Title VI Complaint Procedure

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by **CORE MPO** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with **CORE MPO** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, **CORE MPO** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

CORE MPO has **45** days to investigate the complaint. If more information is needed to resolve the case, the CORE MPO may contact the complainant requesting further information. **The complainant has XX 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 **XX** business days, **CORE MPO** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) 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 letter of finding (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 it must direct the appeal back to the agency. The complainant has **30** days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI

Coordinator (or other official who issued the initial decision). **The appeal process information will be included in the letter.**

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

Asia Hernton, Transportation Planner, Title VI Coordinator

912-651-1456

Email: herntona@thempc.org;

Or visit our administrative office at
110 E State Street, **Savannah, GA, 31401.**

For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

Or

Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **(888) 446-4511**.

*Si necesita información en otro idioma, por favor llame **(888) 446-4511***

Section 5: Title VI Complaint Form

CORE MPO

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-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):

Title VI: Race Color National Origin

Other (specify): _____

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 Civil Rights related 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 _____

If marked Yes in Section V, 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:

CORE MPO
Transportation Planner (Title VI Coordinator)
110 E State Street
Savannah, GA 31401
912-651-1456
Herntona@thempc.org

Section 6: List of Title VI Investigations, Complaints and Lawsuits

The **CORE MPO** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	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.				

Section 7: Public Participation Plan

CORE MPO's Public Involvement Philosophy

CORE MPO welcomes and values public involvement. GDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps **CORE MPO** better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- **CORE MPO** proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Implement a public involvement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Strategies and Desired Outcomes

To promote inclusive public participation, **CORE MPO** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement

- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, CORE MPO has also employed these specific strategies or activities:

- TEPIAC Meetings
- BPAC
- TCC and CORE MPO Board open to public
- CGIC and LIFE (accessibility and language)
- Went to underserved neighborhood association meetings to discuss plans
- Community events (Forsyth Market)
- Utilize federal equity data sets to identify underserved areas and communities
- Virtual opportunities to increase accessibility
- Harambee House Coordination
- Racial and Economic Inequalities Panel Discussion Participation
- Record and post meetings online, including minutes
- Created public education videos
- Conduct orientations
- Coordinated local, regional, and state planning agencies for transit planning

Public Outreach Examples

The public outreach and involvement examples conducted by CORE MPO since the last Title VI Program submission are summarized in the table below.

Specific Public Participation examples are listed in the table below:

Event Date	CORE MPO Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes

Section 8: Four Factor Analysis and LEP Data

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

CORE MPO will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by CORE MPO

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

CORE MPO service area encompasses Chatham County and all Jurisdictions, Richmond Hill and Bryan County within 2020 Census, Defined Savannah Urban Area, Effingham County south of SR 119 - Indigo Road -Bethany Road. Home to approximately 363,315 people spread over 895 square miles, the service area's population speaks 13 different language groups. However, the overall numbers of residents who speak English 'less than very well'

are very low. Of the total service area population of **363,315, 11309**, or **3.11%** of the **population** of residents, report speaking English less than very well. Due to the Hyundai Plant development, the Korean speaking population has grown rapidly and has not been accounted for in the 2018-2022 ACS data. CORE MPO is proactive in serving the needs of this population. A breakdown of the language groups, and those speaking English less than very well, are shown below using census tract within the CORE MPO boundary.

	Bryan County*	Effingham County**	Chatham County	CORE MPO Census Tracts	CORE MPO Census Tracts
Label	Estimate	Estimate	Estimate	Total	% LEP
Total:	31169	53347	278799	363315	90.52%
Speak only English	27823	51230	249805	328858	1.74%
Speak English and Spanish less than "very well"	612	556	5138	6306	0.02%
Speak English and French, Haitian or Cajun less than "very well"	0	0	71	71	0.16%
Speak English and German or other West Germanic languages less than "very well"	125	0	451	576	0.00%
Speak English and Russian, Polish, or other Slavic languages less than "very well"	8	0	0	8	0.23%
Speak English and Other Indo-European languages less than "very well"	191	87	547	825	0.08%
Speak English and Korean less than "very well"	0	0	279	279	0.26%
Speak English and Chinese (incl. Mandarin, Cantonese) less than "very well"	0	0	931	931	0.41%
Speak English and Vietnamese less than "very well"	0	60	1440	1500	0.02%

Speak English and Tagalog (incl. Filipino) less than "very well"	2	9	61	72	0.17%
Speak English and Other Asian and Pacific Island languages less than "very well"	0	0	602	602	0.01%
Speak English and Arabic less than "very well"	0	0	44	44	0.03%
Speak English and Other and unspecified languages less than "very well"	0	0	95	95	0.00%

Data Source: ACS 2018-2022 Table C16001 <https://data.census.gov/cedsci/>

***Bryan County Census Tracts:** 9203.01, 9203.03, 9203.05, 9203.07, 9203.08

****Effingham County Census Tracts:** 302.05, 302.06, 302.07, 302.08, 302.09, 303.01, 303.03, 303.06, 303.07, 303.08, 303.09, 304.01, 304.03, 304.04

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency’s requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the

consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows two languages meets the Safe Harbor threshold—Spanish and Vietnamese. One language is close to the Safe Harbor threshold - Chinese. The CORE MPO area is home to 6306 people (1.74% of the population) who speak Spanish, and speak English less than very well. Additionally, 931 people who speak Chinese (0.26%) speak English less than very well. Lastly, there are 1500 people who speak Vietnamese (0.41%) who speak English less than very well. The number of people who speak other languages and English less than very well all comprise 0.7% of the population each. CORE MPO is expecting the Korean speaking population to meet the Safe Harbor threshold. CORE MPO will begin to provide translated documents in Korean to serve that population.

Be sure to list:

1) All languages that have the lesser of 1,000 people, or 5% of the service area’s population, that speak English “less than very well”. State that these language(s) (if any) meet the Safe Harbor Threshold. If none do, state that.

2) List all languages represented, even if they are less than 1,000 people or 5%. Give a general overview of how few of these speakers there are. See example above (“The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.”)

Designation of Vital Documents

Based on the limited population of Spanish, Chinese, and Vietnamese speakers who also speak English less than very well, CORE MPO designates the following as Vital Documents which be translated to LANGUAGE(S): X, Y, Z. Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, CORE MPO 2050 MTP Executive Summary, and 2050 MTP surveys.

Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.

Describe any data you have, even if you obtain it NOW, that gives you an idea of how much contact with your agency people who are struggling with English have. You can poll workers now to have them approximate how many times a month this happens. The CORE MPO is not a service provider, and direct contact with people struggling with English is rare. However, CORE MPO provides translated materials to serve those populations. This includes translated Title VI documents and translated surveys. CORE MPO also collaborates with non-profits who work with these communities. When CORE MPO undergoes major plan updates, every five years, we evaluate and plan for their needs.

Factor Three: The Importance of the Agency's Service to People's Lives

CORE MPO services likely affects every community member within the planning area. CORE MPO transportation plans impact transportation development throughout the region. This impacts community investments for those who are less than English proficient and English proficient alike. We allocate federal money, and every community is impacted by these investments. CORE MPO allocated more revenues in the 2050 MTP to bike, pedestrian, and transit improvements than their modal shares.

Finally, CORE MPO's planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that CORE MPO has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, CORE MPO staff members who speak Chinese (Mandarin) can be consulted or utilized for translation or interpretation in informal or emergency situations. In the event assistance in a rare language is needed, CORE MPO can reach out to local colleges, universities, or translation organizations to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning an interpreter is needed.

CORE MPO recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with us in another language, we utilize translation services such as the Center for Pan Asian Community Services, Savannah State University (Spanish), and staff at CORE MPO to assist in translation as needed.

Finally, CORE MPO will pay for document translation services when needed, which generally costs about 30 cents per word. For example, the Vietnamese translation of vital documents included in this Program were completed by a paid professional.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, **CORE MPO** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **CORE MPO's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Results: LEP Populations Served

Item #1 – Four Factor Analysis Results: LEP Populations Served

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community; and
4. The resources available and overall cost.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The CORE MPO has identified, developed, and uses the following:

- a) If you have designated Vital Documents (e.g., you have a language(s) that meet the threshold), list those and the languages here.
 - a. Title VI Complaint Form – Translated in Spanish, Chinese (Mandarin), and Vietnamese
 - b) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.

- c) The CORE MPO has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with its LEP responsibilities.
- d) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of CORE MPO’s language assistance measures, CORE MPO provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- ~~The agency’s website includes language stating, “If you need assistance or information in another language, please contact (912) 651-1456.” This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.~~

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

CORE MPO will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the CORE MPO service area.

Updates will continue to include 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 local language assistance programs have been effective and sufficient to meet the need.
- Determine whether CORE MPO’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether CORE MPO has fully complied with the goals of this LEP Plan.

- Determine whether complaints have been received concerning CORE MPO's failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will be provided to CORE MPO staff:

- Information on the CORE MPO Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of Google Translate
- Attending training opportunities
- How to handle a potential Title VI / LEP complaint.

“I Speak” Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñàunh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôïc Vieät Ngöô.	Vietnamese
	당신이 한국어 말할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

CORE MPO did not have in-person encounters with people who speak English less than very well between the Title VI Plan updates. However, during public outreach for the 2050 Metropolitan Transportation Plan (MTP) update, we provided surveys in Spanish, Chinese (Mandarin), and Vietnamese and received several responses. These responses were used to inform the MTP’s Goals and Objectives and financial planning. The survey was open from August 2022 to August 2024.

Language	Surveys Completed
Chinese (Mandarin)	21
Spanish	7
Vietnamese	0

Section 10: Minority Representation Information

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.

***Guidance:** *Elected* transit-related board, committee, or council, do not need to complete the table below. In this case, delete the first A and B below, and keep the second A. If you are completing A and B below, delete the bottom A.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
CORE MPO Policy Board						

Steve Scholar	X					
Tim Callanan	X					
Nick Palumbo	X					
Karen Jarrett	X					
Bruce Campbell			X			
Jim Aiello	X					
Deidrick Cody			X			
Brian West	X					
Dana Williams	X					
Laura Lawton	X					
Karen Williams	X					
Van Johson			X			
Jay Melder	X					
Vivian Canizares		X				
Jamie McCurry	X					
Armand Turner			X			
Gary Norton	X					
Dennis Baxter	X					
Chester Ellis			X			
Michael Kaigler			X			
Tanya Milton			X			
Melanie Wilson			X			
<u>CORE MPO Alt Voting</u>						
<u>Members</u>						
Matt Walker	X					

Heath Maines	X					
Tom Hutcherson			X			
Technical Coordinating Committee (TCC)						
Charles Ackridge	X					
Nathan Clark	X					
Deanna Brooks			X			
Calia Brown	X					
Matt Saxon	X					
Kaniz Sathi						Indian
Heath Maines	X					
Katie Proctor	X					
Rhonda Ferrell	X					
Omar Senati-Martinez		X				
Peter Gulbranson	X					
Mary Moskowitz	X					
Randy Weitman	X					
Wykoda Wang				X		
Michele Strickland	X					
Steve Candler	X					
Robert Millie	X					
Advisory Committee on Accessible Transportation (ACAT)						
Ben Lewis	X					
Wayne Dawson	X					
Brenda Pollen			X			
Paula Valdez		X				

Carol Hunt			X			
Jackie Immel						
Shannon Ginn	X					
Patti Lyons	X					
Tyrone Palmer			X			
Terry Tolbert	X					
Tia Baker			X			
Citizens Advisory Committee (CAC)						
Anthony Abbott	X					
Daniel Brantley			X			
A'riel Johnson			X			
Kevin Glover	X					
Armand Turner			X			
Robert Pirie	X					
Brett Bennett	X					
Bill Grainger	X					
Robert Millie	X					
Bike and Pedestrian Advisory Committee (BPAC)						
Kierra Fields			X			
Damon Rice			X			
Ambria Berksteiner			X			
Justin Bristol	X					
Shannon Ginn	X					
Calia Brown	X					
Skye Lewis	X					

Alden Strandburg	X					
Tina Bockhold	X					
Connor Both	X					
Jim Hemphill	X					
Baird Sills	X					
Transportation Equity and Public Involvement Advisory Committee (TEPIAC)						
Terry Tolbert	X					
Brenda Pollen			X			
Shannon Ginn	X					
Tyrone Palmer			X			
Paula Valdez		X				
Patti Lyons	X					
Ben Lewis	X					
Anthony Abbott	X					
Robert Pirie	X					
A'riel Johnson			X			
Armand Turner			X			
Daniel Brantley			X			
Kevin Glover	X					
Tia Baker			X			

Note: insert the number of people and % of total board membership

We are conducting a voluntary survey for committee and Board members to self-report their racial or ethnic identity.

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the CORE MPO will make every effort to encourage minority participation on the boards. CORE MPO will continue to have a presence in the community, including minority communities, to increase understanding in and participation with the MPO. Additionally, CORE MPO created a Transportation Equity and Public Involvement Advisory Committee, with the intention to facilitate inclusivity and equity within the transportation planning process.

OR

~~CORE MPO does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.~~

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names:

- Cambridge Systematics
- University of Georgia

CORE MPO monitors subrecipients using the following process:

1. CORE MPO uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: To meet this mandate, CORE MPO monitoring consists of collecting data from the consultants through progress report, DBE participation invoice, and other reports/forms. CORE MPO uses these reports to determine if the sub-recipients are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan. Title VI Complaint procedures, Title VI Complaint Form, and the CORE MPO's Title VI Notice have been developed and distributed to our sub-recipients. CORE MPO also assists the sub-recipients with demographic maps for Title VI purposes upon request.
2. CORE MPO collects Title VI programs from the subrecipients listed above and reviews programs for compliance. Subrecipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. CORE MPO and its subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors 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:

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.

Nondiscrimination: The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, or 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.

Solicitations for Subcontractors, including Procurements of Materials and Equipment: In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

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, the Federal Highway Administration 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, the Federal Highway Administration and/or the Federal Transit Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.

Sanctions for Noncompliance: In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, CORE MPO shall impose contract sanctions as appropriate, including, but not limited to:

withholding of payments to the Contractor under the contract until the Contractor complies, and/or cancellation, termination or suspension of the contract, in whole or in part.

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 CORE MPO, Georgia Department

of Transportation, the Federal Highway Administration, 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 our agreement with GDOT, CORE MPO 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. CORE MPO and its contractor and subcontractors shall not discriminate on the basis of race, color, or 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 our agreement with GDOT, vendors and contractors of CORE MPO 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 CORE MPO. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for CORE MPO 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 CORE MPO.

Section 12: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires "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. Has the agency built a facility?

- No, the agency has not built a facility.
- Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. **(Include at the end of the Title VI plan a copy of the Title VI equity analysis.)**

Section 13: Fixed Route Transit Providers Service Standards and 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.

CORE MPO:

is a fixed route transit provider

is **not** a fixed route transit provider