Southwest Georgia
Regional Commission

Title VI Plan

Date Adopted: January 29, 2015
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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

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

Southwest GA Regional Commission further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.

2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.

3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.

4. Develop a complaint process and attempt to resolve complaints of discrimination against Southwest GA Regional Commission.

5. Participate in training offered on the Title VI and other nondiscrimination requirements.

6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.

7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.

8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

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

Signature: ____________________________

Printed Name: Robert McDaniel

Executive Director, Southwest GA Regional Commission

Date

Southwest Georgia Regional Commission
2.0 Introduction & Description of Services

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

Southwest GA Regional Commission is a sub-recipient of FTA funds and provides service in the southwest Georgia service area. A description of the current Southwest GA Regional Commission system is included in Appendix B.

Title VI Liaison:
Suzanne Angell, Deputy Director
Southwest Georgia Regional Commission
229-522-3552, ext. 1603
PO Box 346, Camilla, GA 31730

Alternate Title VI Contact:
Michelle Richardson
Southwest Georgia Regional Commission
229-522-3552, ext. 1610
PO Box 346, Camilla, GA 31730

Southwest Georgia Regional Commission must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

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

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

Southwest Georgia Regional Commission is not a first time applicant for FTA/GDOT funding. The following is a summary of Southwest Georgia Regional Commission current and pending federal and state funding.

Current and Pending FTA Funding

1. FTA 5311 (Operating), FY 2015, $2,770,293.00, Current
2. FTA 5311 (Capital), FY 2015, $666,996.80, Current

Current and Pending GDOT Funding

1. FTA 5311 (GDOT portion of Capital), FY 2015, $83,374.60, Current

Current and Pending Federal Funding (non-FTA)

1. Georgia Dept of Human Services, FY 2015, $1,078,205.17, Current
2. Surface Transportation (STP) Funds, FY 2015, $39,200.00, Current
3. USDA HPG 533, FY 2015, $43,303.49, Current
4. US Dept of Commerce, Economic Development Admin, CY 2013-2015, $189,000.00, Current

Current and Pending State Funding (non-GDOT)

1. Georgia Dept of Human Services, FY 2015, $1,929,391.86, Current
2. Georgia Dept of Community Affairs, FY 2015, $174,966.89, Current
3. GA Dept of Natural Resources, Historic Preservation Division, FY 2015, $4,090.90, Current

During the previous three years, the Federal / State Agencies listed above did not complete a Title VI compliance review of Southwest Georgia Regional Commission. Southwest Georgia Regional Commission has not been found to be in noncompliance with any civil rights requirements.
2.2 Annual Certifications and Assurances

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

Southwest Georgia Regional Commission will remain in compliance with this requirement by annual submission of certifications and assurances as required by Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on January 9, 2015. The Plan was approved and adopted by Southwest Georgia Regional Commission’s Regional Council during a meeting held on January 29, 2015. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.
3.0  Title VI Notice to the Public

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

3.1  Notice to Public

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

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

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2  Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Southwest Georgia Regional Commission’s obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Southwest Georgia Regional Commission’s office(s) including the reception desk and meeting rooms, and on the Southwest Georgia Regional Commission’s website at http://www.swgrc.org. Additionally, Southwest Georgia Regional Commission will post the notice on transit vehicles and in Transit Providers’ offices.

A sample version of this notice is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.
4.0 Title VI Procedures and Compliance

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

4.1 Complaint Procedure

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

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

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

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

The complaint procedure will be made available to the public Southwest Georgia Regional Commission’s website (http://www.swgrc.org).

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Southwest Georgia Regional Commission’s website (http://www.swgrc.org).
4.3 Record Retention and Reporting Policy

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

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

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

4.4 Sub-recipient Assistance and Monitoring

Southwest Georgia Regional Commission has four sub-recipients listed below. Southwest Georgia Regional Commission is required by FTA to ensure that sub-recipients of federal funds comply with all Title VI requirements. To meet this mandate, Southwest Georgia Regional Commission monitoring consists of collecting data through site visits, day-to-day technical assistance, and reports/forms. Southwest Georgia Regional Commission uses reports and site visits 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 a sample Title VI Notice have been developed and distributed by Southwest Georgia Regional Commission to its sub-recipients. Southwest Georgia Regional Commission also assists the sub-recipients with demographic maps for Title VI purposes upon request.

List of Southwest Georgia Regional Commission Sub-Recipients:

- Destiny Transportation Group, Inc.
- MIDS, Inc.
- Resource Management Systems, Inc.
- Thomas County Area Transit

4.5 Sub recipients and Subcontractors

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

**Nondiscrimination Clauses**

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.

2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

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

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Georgia Department of Transportation and/or the Federal Transit Administration, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Georgia Department of Transportation, and/or the Federal Transit Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, Southwest Georgia Regional Commission shall impose contract sanctions as appropriate, including, but not limited to:
   a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
   b. cancellation, termination or suspension of the contract, in whole or in part.

6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the
Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Southwest Georgia Regional Commission, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

**Disadvantaged Business Enterprise (DBE) Policy**

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

**E-Verify**

As a condition of your agreement with GDOT, vendors and contractors of Southwest Georgia Regional Commission 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 Southwest Georgia Regional Commission. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Southwest Georgia Regional Commission 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 Southwest Georgia Regional Commission.
5.0 Title VI Investigations, Complaints, and Lawsuits

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

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

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

Table 1: Summary of Investigations, Lawsuits, and Complaints

<table>
<thead>
<tr>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, or national origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
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<td>1.</td>
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<td>2.</td>
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<td>Lawsuits</td>
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<td>Complaints</td>
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6.0 Public Participation Plan

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

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

Current Outreach Efforts
Southwest Georgia Regional Commission is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Southwest Georgia Regional Commission’s recent, current, and planned outreached activities.

- SWGRC prints and distributes brochures on transit services to our local governments and other interested organizations. These brochures are printed in English and Spanish.
- SWGRC staff attends County and City meetings on request to present information on the transit system.
- SWGRC staff will attend meetings and present information to any other organization that requests info on the public transit system within the region.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).
Southwest Georgia Regional Commission operates a transit system within the Southwest Georgia Regional Commission Service Area (including Baker, Calhoun, Colquitt, Decatur, Dougherty, Early, Grady, Lee, Miller, Mitchell, Seminole, Terrell and Worth Counties). The Language Assistance Plan (LAP) has been prepared to address Southwest Georgia Regional Commission’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Southwest Georgia Regional Commission service area there are 8,474 residents or 2.93% who describe themselves as not able to communicate in English very well (Source: US Census). Southwest Georgia Regional Commission is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Southwest Georgia Regional Commission has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

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

The Southwest Georgia Regional Commission’s transit-related, non-elected Committee consists of 11 members of the Southwest Georgia Regional Council appointed by the Chairperson of the Regional Council and the Executive Director of the Regional Commission. The Regional Council (the body from which the Committee is chosen) is made of elected officials and non-public members within the fourteen counties of the Regional Council. The Counties and Cities within the region appoint representatives to the Council as prescribed by O.C.G. A. 50-8-34 (2014). The Governor, Lieutenant Governor and the Speaker of the House of Representatives also appoint members to the Regional Council.

<table>
<thead>
<tr>
<th>Body</th>
<th>Caucasian</th>
<th>Latino</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
<th>Other</th>
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</thead>
<tbody>
<tr>
<td>Service Area Population</td>
<td>48.6%</td>
<td>5.5%</td>
<td>44.1%</td>
<td>.62%</td>
<td>.11%</td>
<td>1.07%</td>
</tr>
<tr>
<td>Transportation Committee</td>
<td>54.5%</td>
<td>0%</td>
<td>45.5%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
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</table>

Southwest Georgia Regional Commission will make efforts to encourage minority participation on the Transportation Committee. Southwest Georgia Regional Commission will utilize minority population demographic maps included in Appendix I when appointing members of the Regional Council to the Transportation Committee.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.
Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Southwest Georgia Regional Commission will ensure the following:

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

2. When evaluating locations of facilities, Southwest Georgia Regional Commission will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.

3. If Southwest Georgia Regional Commission determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Southwest Georgia Regional Commission may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Southwest Georgia Regional Commission must demonstrate and document how both tests are met. Southwest Georgia Regional Commission will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

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

### 10.0 System-Wide Service Standards and Service Policies

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

Southwest Georgia Regional Commission is not a fixed route service provider.
11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers
Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipient shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements**

*All recipients must submit:*

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

**Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
- Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode
Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

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

Current System Description
Current System Description

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

Southwest Georgia Regional Commission's transit program objectives are to:

- Establish a transit network within the thirteen (13) county area (Southwest GA, excluding Thomas County) that will enable residents to access employment and resources that are necessary to live a quality life. While available to all residents of the region, the use of public transportation infrastructure is primarily intended for citizens who cannot drive or who do not have reliable personal transportation and need transport to (and from): 1) their place of employment, 2) human service agency facilities 3) childcare, 4) medical facilities, 5) personal business and shopping, and 4) cultural and recreational facilities.
- Operate a regional rural public transit program that will serve the transportation needs of a thirteen county area in a safe, efficient and cost-effective manner.
- Stimulate employment and economic development through establishment of the transportation connection between residents and their community.
- Develop a public transportation program that is economically stable through collection of fares and Purchase of Service contracts.
- Establish a component of a fully coordinated system that serves all of the needs of Southwest Georgia.

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

The Southwest Georgia Regional Commission (RC) is a governmental entity created under O.C.G.A 50-8-32. The RC and its Regional Council is the entity responsible for setting the objectives for the rural public transportation system on behalf of the local governments authorizing the program through the RC. The Regional Council has designated a subcommittee charged with the responsibility of identifying, reviewing, monitoring and recommending to the Regional Council, the goals and objectives for the Section 5311 program. Based on the Transportation Subcommittee reports and recommendations, the Regional Council makes all final decisions in the interest of improving the mobility and quality of life for all residents of the thirteen counties, and to best utilize the Section 5311 program by increasing service delivery, maximizing revenues, and controlling costs.

The RC Management Team for the Transportation Program consists of the Executive Director, Deputy Director and the Transportation Billing Coordinator. The RC currently contracts with three private third-party operators (TPO) to provide transit services within the region. The region is divided into five sub-areas to allow for parallel contracting with other state contracts and to allow for a competitive bid process when procuring services. All current TPOs have a minimum of ten (10) years of experience in providing transportation services. The RC provides all oversight of the TPOs, but does not provide any direct service. The TPOs provide the RC with monthly transit activity
reports and financial data and the RC conducts semi-annual monitoring of the TPOs to ensure accuracy of reporting. The RC also monitors the Drug and Alcohol program and vehicle inspections and other aspects of the program.

2. **Indicate if your agency is a government authority.**

Southwest Georgia Regional Commission is a governmental entity created under O.C.G.A 50-8-32.

3. **Who is responsible for insurance, training and management, and administration of the agency’s transportation programs?**

The Management Team of the Southwest Georgia Regional Commission is responsible for administering and monitoring the overall operations of the transportation program. Managers for each TPO are responsible for day to day operations of the program and are responsible for ensuring all procedures and policies, in regard to operations, are followed. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Manager for each TPO is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. The Deputy Director of the RC is responsible for administering all aspects of the transportation program and to monitor access and usage of all agency vehicles.

4. **Who provides vehicle maintenance and record keeping?**

Maintenance on all agency vehicles is provided by the TPOs. TPOs employ only ASE certified technicians with experience in working on commercial passenger vehicles. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at the TPO’s operations base and are maintained by the TPO Manager. All records are maintained and retained for a minimum of four (4) years.

5. **Number of current transportation related employees**

Our current TPOs employ a total of 108, which include: 73 full-time drivers, 7 part-time drivers, 7 administrators and 21 support staff. The RC employees three transportation related employees (2 administrators and 1 support staff).

6. **Who will drive the vehicle, number of drivers, CDL certifications, etc.?**

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. Drivers of a twenty passenger van are required to carry a Commercial Driver’s License.
7. **A detailed description of service routes and ridership numbers**

Transportation services provided through the program are available to all consumers, but are primarily targeted toward citizens who cannot drive or who do not have reliable personal transportation and need transport for:

- Employment
- Training
- Nutrition
- Social Service
- Childcare
- Medical
- Personal business and shopping
- Cultural and recreational facilities

In FY 2014, the Southwest GA RC Transportation Program provided a total of 275,930 trips, with over 174,000 service hours and 3.2 million miles driven. Of those trips, 59,655 were public trips, 165,009 were trips funded by human service agencies and 51,266 trips were funded by Medicaid. The RC Transportation program encourages the coordination of services (group trips and multi-loading) between different funding sources in order to provide the most efficient and cost effective service.

The RC currently has 74 vehicles in the fleet, 62 of which are handicapped accessible. All vehicles have tablets installed which allow real-time communication with dispatch and the dispatch software (Routematch). More than half of the vehicles have video cameras installed, the other half will be installed in FY15. Vehicles are
Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter
Insert a copy of the Title VI Plan adoption meeting minutes and the GDOT concurrence letter.
Appendix D

Title VI Sample Notice to Public
Southwest Georgia Regional Commission

- Southwest Georgia Regional Commission 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 Southwest Georgia Regional Commission.

- For more information on Southwest Georgia Regional Commission’s civil rights program, and the procedures to file a complaint, contact Suzanne Angell at (229)522-3552, ext. 1603 or email sangell@swgrc.org; or visit our administrative office at 181 E Broad Street, Camilla, GA 31730. For more information, visit www.swgrc.org.

- If information is needed in another language, contact Suzanne Angell at (229)522-3552, ext 1603, or at sangell@swgrc.org.

- Si necesita información en otro idioma, póngase en contacto con Suzanne Angell (229) 522-3552, ext 1603, o en sangell@swgrc.org.

- You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Ave., SE, Washington, DC 20590

Notificar a la pública bajo título VI

Comisión Regional del Sudoeste Georgia

- Comisión Regional del sudeste Georgia de derechos de opera sus programas y servicios sin distinción de raza, color y origen nacional con arreglo al título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agravado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja ante la Comisión Regional de Sudoeste Georgia.

- Para más información sobre el programa derechos civiles de Comisión Regional de Sudoeste Georgia y los procedimientos para presentar una queja, póngase en contacto con Suzanne Angell (229) 522-3552, ext. 1603 o correo electrónico sangell@swgrc.org; o visite nuestra oficina administrativa en 181 Broad Street, Camilla, GA 31730. Para obtener más información, visite www.swgrc.org.

- Si necesita información en otro idioma, póngase en contacto con Suzanne Angell (229) 522-3552, ext 1603, o en sangell@swgrc.org.

- If information is needed in another language, contact Suzanne Angell at (229)522-3552, ext 1603, or sangell@swgrc.org.

- También puede presentar su queja directamente con el TLC en: Federal Transit Administration oficina de derechos civiles atención: Coordinador del programa Título VI, East Building, 5th Floor - TCR 1200 New Jersey Ave., SE, Washington, 20590 DC
Appendix E

Title VI Complaint Form
# Title VI Complaint Form

## Section I:

<table>
<thead>
<tr>
<th>Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Telephone (Home):</td>
</tr>
<tr>
<td>Electronic Mail Address:</td>
</tr>
</tbody>
</table>

## Section II:

<table>
<thead>
<tr>
<th>Are you filing this complaint on your own behalf?</th>
<th>Yes*</th>
<th>No</th>
</tr>
</thead>
</table>

*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):

<table>
<thead>
<tr>
<th>[ ] Race</th>
<th>[ ] Color</th>
<th>[ ] National Origin</th>
<th>[ ] Age</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] Disability</td>
<td>[ ] Family or Religious Status</td>
<td>[ ] Other (explain)</td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Have you previously filed a Title VI complaint with this agency?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>
### Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

[ ] Yes  [ ] No

If yes, check all that apply:

[ ] Federal Agency: __________________________

[ ] Federal Court ____________________________  [ ] State Agency ______________

[ ] State Court ____________________________  [ ] Local Agency ______________

Please provide information about a contact person at the agency/court where the complaint was filed.

<table>
<thead>
<tr>
<th>Name:</th>
</tr>
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<tbody>
<tr>
<td>Title:</td>
</tr>
<tr>
<td>Agency:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Telephone:</td>
</tr>
</tbody>
</table>

### Section VI

Name of agency complaint is against:

<table>
<thead>
<tr>
<th>Contact person:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title:</td>
</tr>
<tr>
<td>Telephone number:</td>
</tr>
</tbody>
</table>

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:

Southwest Georgia Regional Commission Title VI Liaison
PO Box 346
Camilla, GA 31730
**Comisión Regional del sudoeste Georgia**

**Título VI denuncia forma**

<table>
<thead>
<tr>
<th>Sección I:</th>
</tr>
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<tbody>
<tr>
<td><strong>Nombre:</strong></td>
</tr>
<tr>
<td><strong>Dirección:</strong></td>
</tr>
<tr>
<td>Teléfono (Casa):</td>
</tr>
<tr>
<td><strong>Dirección de Correo Electrónico:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>¿Requisitos de formato accesible?</th>
<th>Impresión de gran tamaño</th>
<th>Cinta de Audio</th>
</tr>
</thead>
<tbody>
<tr>
<td>TDD</td>
<td></td>
<td>Otros</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sección II:</th>
</tr>
</thead>
<tbody>
<tr>
<td>¿Usted está presentando esta queja en su nombre?</td>
</tr>
<tr>
<td>* Si usted respondió &quot;Sí&quot; a esta pregunta, ir a la sección III.</td>
</tr>
<tr>
<td>Si no, por favor suministrar el nombre y la relación de la persona a quien usted se queja:</td>
</tr>
<tr>
<td>Explique por qué ha presentado por un tercero:</td>
</tr>
<tr>
<td>Por favor confirme que ha obtenido el permiso de la parte agraviada si radicara en nombre de un tercero.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Sección III:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Creo que he experimentado la discriminación se basaba en (marque todas las que apliquen):</td>
</tr>
<tr>
<td>[ ] Carrera</td>
</tr>
<tr>
<td>[ ] Discapacidad</td>
</tr>
<tr>
<td>Fecha de la supuesta discriminación (mes, día, año):</td>
</tr>
<tr>
<td>Explicar lo más claramente posible lo que pasó y por qué usted cree que fueron discriminados. Describir a todas las personas que estuvieron involucradas. Incluir el nombre e información de contacto de la persona que discriminó (si lo conoce) así como nombres e información de contacto de testigos. Si se necesita más espacio, utilice el dorso de este formulario.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sección IV</th>
</tr>
</thead>
<tbody>
<tr>
<td>¿Anteriormente ha presentado una queja del título VI con esta agencia?</td>
</tr>
</tbody>
</table>
## Sección V

¿Ha presentado esta queja con cualquier otro Federal, estatal o agencia local, o con cualquier Tribunal Federal o estatal?

[ ] Si  [ ] No

Si es así, compruebe todas las que apliquen:

[ ] Agencia Federal para el__________________________

[ ] Tribunal Federal__________________________  [ ] La Agencia Estatal__________________________

[ ] Estado de corte__________________________  [ ] Agencia Local__________________________

Sirvanse proporcionar información sobre una persona de contacto en la Agencia/corte donde se presentó la queja.

<table>
<thead>
<tr>
<th>Nombre:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Título:</td>
</tr>
<tr>
<td>Agencia:</td>
</tr>
<tr>
<td>Dirección:</td>
</tr>
<tr>
<td>Teléfono:</td>
</tr>
</tbody>
</table>

## Sección VI

Nombre de denuncia de la agencia es contra:

<table>
<thead>
<tr>
<th>Persona de contacto:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Título:</td>
</tr>
<tr>
<td>Teléfono:</td>
</tr>
</tbody>
</table>

Usted puede conectar cualquier material escrito u otra información que crees que es pertinente a su queja.

Firma y fecha especificadas a continuación:

__________________________  ________________________
Firma            Fecha

Por favor, envíe este formulario en persona en la siguiente dirección, o envíe por correo este formulario para:

Southwest Georgia Regional Comisión título VI Enlace
PO Box 346
Camilla, GA 31730
Appendix F

Public Participation Plan (PPP)
Introduction

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

Public Participation Goals

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

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

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Southwest Georgia Regional Commission. SWGRC intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.
SWGRC will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Southwest Georgia Regional Commission’s website (www.swgrc.org) and all feedback on the site will be recorded and passed on to SWGRC management. The public will also be able to call the Southwest Georgia Regional Commission’s office at 229-522-3552 during its hours of operation (8am – 5pm). Feedback collected over the phone will be recorded and passed on to SWGRC management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

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

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

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

The Southwest Georgia Regional Commission is a public entity and at times may be required or may choose to hold a Public Hearing if public input is desired or requested on a particular matter, for example, if the Transit System is considering raising public fares. Although a public hearing is also a public meeting or occurs in the context of a public meeting, the main purpose of most public hearings is to obtain public testimony or comment. A public hearing may occur as part of a regular or special meeting, or it may be the sole purpose of a special meeting, with no other matters addressed.

A form of public notice is required for all Public Hearings. Generally, the SWGRC will publish a public notice in all local newspapers within the region at least a week to ten days before the Public Hearing is held. Notice will also be published on the SWGRC website: www.swgrc.org.

Public Hearings are generally informal. The main concern is to provide an opportunity for all attending members of the public to speak if they so desire. The "ground rules" for the conduct of the hearing should be stated by the chairperson or presiding official at the beginning of the hearing. Time limits should be placed on individual comments if many people are intending to testify, and the public should be advised that comments must relate to the matter at hand. Order and decorum should be maintained at all times, testimony should be limited where necessary, but an impartial attitude should always be maintained.

Any decisions made at a Public Hearing should be clear and understandable, based on evidence of the record and is consistent with any legal standards that apply to the situation.
Appendix G
Language Assistance Plan (LAP)
I. Introduction

Southwest Georgia Regional Commission (SWGRC) operates a transit system within the area of Southwest Georgia, including the counties of Baker, Calhoun, Colquitt, Decatur, Dougherty, Early, Grady, Lee, Miller, Mitchell, Seminole, Terrell, Worth. The Language Assistance Plan (LAP) has been prepared to address SWGRC’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In SWGRC service area there are 8,474 residents or 2.93% who describe themselves as not able to communicate in English “very well” (Source: US Census). SWGRC is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. SWGRC has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

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

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

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

This plan will demonstrate the efforts that Southwest Georgia Regional Commission undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:
II. **Four Factor Analysis**

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

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

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

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

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

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

      Of the 289,305 residents in the Southwest Georgia Regional Commission service area 8,474 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize SWGRC services. For the SWGRC service area, the American Community Survey of the U.S. Census Bureau shows that of the area’s population of those that don’t speak only English, 3.04% speak English “very well”. For groups who speak English “less than very well”, 2.56% (7,420 persons) speak Spanish and .05% speak “Other Indic” languages.

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

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

      The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.
SWGRC has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that the SWGRC service area has a possible prominent LEP group of persons who speak Spanish. Phone inquiries and staff survey feedback indicated that SWGRC dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, SWGRC has had 0 requests for translated documents.

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

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

In the past, passenger surveys have been conducted to collect data on usage of and access to the SWGRC transit services. According to these surveys, the most common age group among all the participants in the survey was 65 or older. The largest percentage of trips provided on the public transit buses are Human Service trips, specifically consumers of Department of Aging services and consumers of the Department of Behavioral Health and Developmental Disabilities (DBHDD) services.

When respondents were asked how they would have made the trip had SWGRC not been available, the most frequent response was “friend of family member”. A large portion of respondents indicated they would not have made the trip if the service was not available. This data indicates that the Southwest Georgia Regional Commission Service is very important as a primary means of transportation for its customers.

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

Southwest Georgia Regional Commission assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. Language Line Services is a provider of this service that SWGRC has used in the past. Southwest Georgia Regional Commission provides a reasonable degree of services for LEP populations in its service area.
III. Language Assistance Plan

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

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

The five elements are addressed below.

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

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

Southwest Georgia Regional Commission has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 94.03% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (4.85%). Of those whose primary spoken language is Spanish, approximately 2.56% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for .37% of the service area population.

Southwest Georgia Regional Commission may identify language assistance need for an LEP group by:

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

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

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

Southwest Georgia Regional Commission has undertaken the following actions to improve access to information and services for LEP individuals:

1. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
2. Provide Language Identification Flashcards onboard transit vehicles and in the Southwest Georgia Regional Commission offices.
3. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

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

c. **Element 3: Training Staff**

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

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

In the case of Southwest Georgia Regional Commission, the most important staff training is for Customer Service Representatives (Dispatchers) and Transit Drivers.

The following training will be provided to Customer Service Representative:

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

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

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

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

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

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

**IV. Safe Harbor Provision**

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

Southwest Georgia Regional Commission service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish speaking persons qualify for the Safe Harbor Provision as the number of person which speak English less than “very well”. These Spanish speakers...
who speak English less than “very well” account for 2.56% of the area’s population and are a total of 7,420 persons.

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

Operating Area Language Data:

Southwest Georgia Regional Commission Service Area
<table>
<thead>
<tr>
<th>Language</th>
<th>Baker County, Georgia</th>
<th>Calhoun County, Georgia</th>
<th>Colquitt County, Georgia</th>
<th>Decatur County, Georgia</th>
<th>Dougherty County, Georgia</th>
<th>Early County, Georgia</th>
<th>Grady County, Georgia</th>
<th>Lee County, Georgia</th>
<th>Miller County, Georgia</th>
<th>Mitchell County, Georgia</th>
<th>Seminole County, Georgia</th>
<th>Terrell County, Georgia</th>
<th>Worth County, Georgia</th>
<th>Total SWGC RC Region</th>
<th>Percent of Population</th>
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Southwest Georgia Regional Commission

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<th>Language</th>
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<th>Count</th>
<th>Percentage</th>
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94.03% (272,045) of Total Region Population speaks only English
3.04% (8,785) of Total Region speaks English very well
2.93% (8,474) of Total Region speaks English less than very well
Appendix I
Demographic Maps
MAPS ARE IN PROCESS
Appendix J

Title VI Equity Analysis
Southwest Georgia Regional Commission has not performed Title VI Equity Analysis.
Appendix K

Text Formatting Palette
Formatting/Styles

Report margins:
- Top margin = 1”
- Bottom margin = 1”
- Left margin = 1.25”
- Right margin = .75”

Heading levels:

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

**Heading 2**
Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

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

**General Instructions**

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

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