TITLE VI PLAN

March 2023

Lower Savannah Council of Governments
on Behalf of Aiken County Transit/Best Friend Express

Contents

Introduction and Brief Description of Transit Service 2
I. Title VI Sample Notice to the Public 3
I. a. Listing of Locations Where Title VI Material Can be Accessed 3
II. Title VI Sample Complaint Forms 4
III. Title VI Complaint Investigation Procedures 6
IV. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits 7
V. Public Participation and Access 8
V.a. Aiken County Transit/ Best Friend Express Public Participation and Access 8
V.b. Examples of Public Participation Plan Activity Over the Past Three Years 9
VI. Limited English Plan or Language Assistance 10
VII. Minority Representation on Planning and Advisory Bodies 10
VIII. Monitoring of Subrecipients and Contractors for Title VI 10
IX. Title VI Equity Analysis 11
X. Executive Board Resolution for Approval of Title VI Plan Submission 11
XI. Service Standards and Service Policies of the Best Friend Express Fixed Route Service 11
XI. a. Vehicle Assignment and Transit Amenities 11
XI.b. Vehicle Load and Vehicle Headway 12
XI.c. On-Time Performance for Fixed Route and Service Accessibility 12
Appendix A – Limited English Plan (LEP) .....
Appendix B – Board Resolution .....

Introduction and Brief Description of Transit Service

The Lower Savannah Council of Governments assures the Federal Transit Administration (FTA), and all passengers, that no person shall on the basis of race, color, or national origin be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any transit program or activity undertaken by this agency. This commitment, and the following Title VI Plan, are the result of guidance provided by FTA Circular 4702.1B, dated October 2012; referencing protections under Title VI of Civil Rights Act of 1964, 49 CFR Part 21.

Lower Savannah Council of Governments (LSCOG) took over the management and federal grant responsibilities for the Aiken County public transit service operating in the urbanized portion of Aiken County in 2004. This three route fixed route service is known as the Best Friend Express or BFE. Buses operate throughout 170 miles of Aiken County every Monday through Friday, from 7:00 am to 7:00 pm. Each bus can carry up to 14 passengers and all vehicles are compliant with the Americans with Disabilities Act (ADA), including wheelchair lifts. The Best Friend Express transit system also provides for paratransit services through their Dial-a-Ride (DAR) program.

I. Title VI Sample Notice to the Public

NOTICE

YOUR RIGHTS UNDER TITLE VI, CIVIL RIGHTS ACT OF 1964, AS AMENDED

The transportation services of the Best Friend Express and Dial-a-Ride are provided without discrimination based on your race, color, and national origin.

Should passengers believe they have been discriminated against by the Best Friend Express and Dial-a-Ride public transit system, they may receive a Title VI Complaint Form to file. Complaint Forms and instructions are available online at bestfriendexpress.com or the Lower Savannah Council of Governments (LSCOG) website at lscog.org. Additional information on your civil rights and how to file a complaint is also available by emailing cchandler@lscog.org. You may file a discrimination complaint within 180 days to LSCOG, or directly with FTA Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 Jersey Ave SE, Washington DC 20590.

For more information on your Civil Rights under Title VI, please contact:

Lower Savannah Council of Governments
2748 Wagener Road
Aiken, SC 29801
(803) 649-7981
Ask for the Transit Manager

(Note: This Notice and accompanying Title VI Complaint material is also posted in Spanish)

I. a. Listing of Locations Where Title VI Material Can be Accessed

Lower Savannah Council of Governments has Title VI Civil Rights material available at the following locations:

- The LSCOG website (www.lscog.org) has the Title VI Notice, Complaint Process, and Complaint Form posted under Departments → Transportation → Title VI for Transit;
- The Best Friend Express / Dial-A-Ride website (www.bestfriendexpress.com) has the Title VI Notice, the Complaint Process and Complaint Form posted on the front page;
- The third party contractor for the fixed route and ADA paratransit transportation services procured by LSCOG, Aiken Area Council on Aging dba Aiken Senior Life Services, has the updated Title VI Plan in its entirety supplied to them as an Appendices to their contract, as well as the Notice, Complaint Process and Complaint Form at their front desk;

- The Title VI Notice is posted on the wall in each Best Friend Express bus in both English and Spanish. The driver has a manila folder on the bus with copies of the Title VI Complaint Process and Complaint Form, as supplied to them by LSCOG;
- A Title VI Notice is posted on the bulletin board in the LSCOG offices. The front desk receptionist is supplied with the Notice, Complaint Process and Complaint Form in case of an inquiry from a walk-in member of the public/passengers.

II. Title VI Sample Complaint Forms

Lower Savannah Council of Governments
Best Friend Express and Dial-A-Ride
Title VI Complaint Process

The Lower Savannah Council of Governments (LSCOG) is authorized, and required, to implement a FTA approved Title VI program and to provide oversight for its contractor(s) selected to operate the Best Friend Express fixed route service and the Dial-A-Ride ADA complementary paratransit serving the urbanized portion of Aiken County. LSCOG endeavors to ensure that the level and quality of transportation service provided to the public is accomplished without discrimination in regard to race, color, or national origin.

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the operators of the Best Friend Express, Dial-A-Ride, dispatchers, or mobility managers may file a Title VI complaint immediately, or no later than 180 days. You may submit your complaint with LSCOG, or directly with FTA, at the addresses below. Complaint Forms may be obtained from LSCOG offices, by the Best Friend Express website www.bestfriendexpress.com or www.lscog.org/transportation or from the transit lobby desk of the Best Friend Express at 1310 E. Pine Log Rd, Aiken, SC. LSCOG is responsible for investigating complaints it receives and within ten (10) working days LSCOG will send a letter to the complainant acknowledging receipt of the complaint, requesting any additional information necessary, and enclose a copy of the full complaint and appeals process. If necessary, a meeting will be held between all affected parties within those ten working days. The complainant will receive a written response/outcome from LSCOG regarding their claim within 15 days following the full investigation.

To submit a Title VI Complaint Form or Obtain More Information Regarding Your Civil Rights under Title VI, Please Contact:

Lower Savannah Council of Governments; 2748 Wagener Rd, Aiken, SC 29801 803-649-7981
Attention: Nora Sanders, Assistant Executive Director, LSCOG Or Christine Chandler, Transit Operations Manager, LSCOG
Or
File a Claim Directly with:
Federal Transit Administration, Office of Civil Rights, Attention: Title VI Coordinator
East Building; 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590

Lower Savannah Council of Governments

Title VI Complaint Form

This form is to be completed by any person who believes they have experienced discrimination in regard to race, color or national origin while receiving transportation services. Please submit this complaint immediately, but no later than 180 days, to:

Lower Savannah Council of Governments (LSCOG)
PO Box 850 or 2748 Wagener Rd, Aiken, SC 29801
803-649-7981 Front Desk

Section 1:
Name:
Address:
Telephone:
Email Address:
Accessible Formats Needed? Please Circle: Large Print TDD Other:
Section II:
Are you filing this complaint on your own behalf? Please Circle: YES NO
If "Yes," please go to Section III
If "No," please enter your name and relationship to 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. Please Circle: YES NO
Section III:
I believe discrimination was experienced based on: (Please check all that apply) [ ] Race [ ] Color [ ] National Origin
Date of Alleged Discrimination: (month/date/year)
Please identify the person or agency involved in the alleged discrimination:

Section IV: Please explain as clearly as possible what happened and why you believe you were discriminated against. Please include the names of those involved, or witnesses (if known). If necessary, please use an additional sheet of paper.

Section V:
Have you filed this complaint with any other Federal, State, or Local Agencies, or courts? If "Yes," please identify the agency and contact information for that agency:
You may attach any written material or other information you think is relevant to your complaint.
X
Signature Above (Required) **Date Above** (required)

(Note: All Title VI Notices and Complaint Material Posted for the Public in Both English and Spanish)

III. Title VI Complaint Internal Investigation Procedures

Any person who believes he or she has been discriminated against on the basis of race, color or national origin when using transit services from the Best Friend Express or Dial-a-Ride may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Lower Savannah Council of Governments (LSCOG) investigates complaints it receives that are no more than 180 days after the alleged incident. The LSCOG will process complaints that are complete.

Once the complaint is received and date-stamped, the LSCOG will determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by our office within 10 calendar days of receipt. The LSCOG has sixty (60) calendar days to investigate the complaint. If more information is needed to resolve the case, the LSCOG will contact the complainant by letter. The complainant has ten (10) business days from the date of the letter to send the requested information to the Title VI investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within the specified number of business days, the LSCOG can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their written complaint submission.

After the investigator completes the full complaint review, one of two letters to the complainant will be issued: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states there was not a Title VI violation and that the case will be closed. An 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, they have thirty (30) days to do so from the time they receive the closure letter, or the Letter of Finding.

This entire complaint procedure is made available to all public members/passengers who contact LSCOG regarding their Title VI Civil Rights. This complaint procedure is also available to the public by the posting of the entire Title VI Plan on the Best Friend Express website, the LSCOG website, as well as being provided upon request in another format by LSCOG. A truncated version of this entire procedure is also posted to several locations that are identified in *Section I.a.*

IV. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Lower Savannah Council of Governments **has not received**, or been presented with, any transit-related **Title VI complaints** or lawsuits and has not performed any investigations since the submission of the last Title VI plan to FTA in 2020.

LSCOG will maintain files detailing Title VI complaints, investigations, and lawsuits. These files will have, at a minimum, the items as listed in FTA C 4702.1B *"…the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the recipient in response, or final findings related to the complaint, lawsuit, or investigation."* A copy of the formal Complaint Form will be kept in the file, as well as a copy of any correspondence between involved parties. LSCOG will report to the regional FTA Civil Rights Office regarding the complaint, investigation, or lawsuit, as appropriate. A sample tracking spreadsheet for LSCOG is located below.

Title VI Complaint Tracking

Date Complaint Received	**Summary of Allegations** *(attach extra sheets)*	**Status Comments** (*jurisdiction, request for further info, etc)*	**Identify Addt'l Correspondence or Meetings**	**Actions Taken**	**Final Findings** *(Closure Letter or Letter of Finding Sent?)*

V. Public Participation and Access

LSCOG is a part of the Augusta, GA-Richmond County MPO and an ARTS planning participant. LSCOG and ARTS work together for the planning functions and public comment sessions surrounding the UPWP, the TIP/STIP and Long Range MTP. The public participation plan for ARTS specifically identifies the South Carolina part of the urbanized area and the Best Friend Express and Dial-A-Ride transit system (with LSCOG as the grantee) as Public Participate Plan participants. The plan was last updated in 2021 and can be accessed at the City of Augusta website's Planning Department page. The plan outlines such things as public notification and outreach strategies and the role of technology and social media in public outreach and transparency.

V.a. Aiken County Transit/ Best Friend Express Public Participation and Access

LSCOG manages the contract operations of the fixed route Best Friend Express transit system and the ADA complementary paratransit service known as Dial-a-Ride separate from any transportation services offered in Augusta, GA -- Richmond County. LSCOG is a Direct Recipient of FTA Section 5307 funding and performs its own grant management. In addition to the ARTS MPO public comment events and outreach strategies, LSCOG also has public participation opportunities within the urbanized portion of Aiken County that support the needs of the Best Friend Express public transportation system.

Part of public participation opportunities involves a mandatory public hearing if the determination of "significant change" is being sought for the Best Friend Express transit system. There is also the opportunity to place representation of public transit's target populations (minorities, low-moderate income, LEP members of the public) on all transit "study" projects like the five year Transit Development Plan specifically for the Best Friend Express. LSCOG partners with workforce development (WIOA) for the annual "Power Up Your Future" youth forum in Aiken (next one taking place on March 16, 2023) as an opportunity to learn of the transportation needs of graduates and those seeking immediate employment after graduation.

LSCOG will conduct "key person interviews" prior to significant decisions affecting public transportation. LSCOG will seek input from persons in the community who represent targeted populations such as minorities or persons with low income, and interview representatives of the community like elected officials, funders, health centers, higher education and so forth. Passenger surveys posted to a website or conducted on the bus in-person are also tools for feedback.

LSCOG expands the venues listed in the ARTS participation plan by having the option to schedule public meetings at the operations contractor's Best Friend Express Headquarter Office, as well. This venue is helpful because it is a transfer point for Best Friend Express fixed routes serving the county and passengers can more easily be dropped off and picked up at this location before, or after, their participation in a meeting. LSCOG recognizes it is necessary at times to provide for public input after traditional working hours and makes sure that any meeting regarding significant service changes has two sessions available to the public; with one of them being after 5:00 pm.

The procured transit service provider, Aiken Senior Life Services (ASLS), has a mobility manager dedicated to LSCOG funded transit programs (Best Friend Express, Dial-a-Ride, Urban 5310 demand response). The transit operations manager at LSCOG is in close contact with the mobility manager at ASLS to assist each other in addressing the riding public needs, program eligibility, and advocacy for transit system improvement. The ASLS mobility manager is also a valuable partner in providing language assistance for passengers and alerting LSCOG to the occasional opportunity to provide alternative formats to the public.

V.b. Examples of Public Participation Plan Activity Over the Past Three Years

- The ARTS/MPO has quarterly meetings for each of their three committees: Policy, Technical and Citizen Committees. LSCOG staff are active, voting members of two of the committees and also attend the Citizen Committee. A report regarding the Best Friend Express is given at each meeting and published in its minutes.
- LSCOG sponsors and attends public participation meetings in Aiken County regarding the TIP, UPWP, and the long range Metropolitan Transportation Plan (MTP). Many of these public meetings went "Zoom virtual" during the pandemic. There was also an increase in the use of social media tools by both LSCOG and the City of Augusta Planning Department to gather public comment and post the occasional survey. Public Review and Comment opportunities included:
    - TMA 4 Yr Re-Certification Public Review and Comment ending October 6, 2020.
    - TIP and MTP Public Review and Comment ending June 14, 2021.
    - TIP Amendment / MTP Public Review and Comment ending August 29, 2021.
    - UPWP Public Review and Comment ending February 7, 2022.
    - TIP and MTP Amendments Public Review and Comment ending March 28, 2022.
- Presentations regarding public transit, and human service transportation, by the LSCOG Transit Operations Manager took place in February 2020 to senior groups including Wyndham House, Croft House, Shadow Oaks Assisted Living, and Carlyle Senior Care in Aiken. All locations are on, or close to, one of the Best Friend Express routes and fall within the urbanized portion of Aiken County service area. A survey of transit needs and personal care attendants available for transportation assistance were discussed during the presentations and Q&A portion of the meetings.
- Attendance and participation at the Transit Association of South Carolina annual conference and then quarterly, regional workshops in 2020, 2021 (online workshops), and 2022.
- Best Friend Express and Dial-a-Ride passenger satisfaction survey and requests for comment was conducted in 2021.

- An Open House at the new location of the procured transit service provider's transit headquarters was held January 2023 highlighting the fixed routes offered by the Best Friend Express.

VI. Limited English Plan or Language Assistance

The most recent Limited English Plan (LEP) can be found as "Appendix A" of this document.

VII. Minority Representation on Planning and Advisory Bodies

Lower Savannah Council of Governments is governed by a Board. LSCOG **does not** as an FTA recipient **"select"** their own Board members; rather Board representation is dictated by the existing bylaws. LSCOG is fortunate in that minority representation is a priority of the Board and the bylaws reflect that value. The Lower Savannah region has six counties (including Aiken County) and each of those counties has elected County Councils that are responsible for appointing Board members. Each County Council appoints four elected officials and two at-large members. At least two of the appointees must be minority members. The minority representatives are appointed by the various County Councils "…after soliciting input from minority groups on the Lists of Minority Organizations maintained by the Council and determining that minority persons other than Elected Officials who are appointed as representative shall be an acceptable spokesperson for minority interests" (Article II of the LSCOG Bylaws). As of February 2023, 39 of the 40 Board of Directors positions are filled. Minority appointments total 54% of the Board of Directors positions for LSCOG.

VIII. Monitoring of Subrecipients and Contractors for Title VI

Lower Savannah Council of Governments is an FTA Direct Recipient with **no subrecipients** to monitor for Title VI Plan submissions. LSCOG does; however, recognize the need to monitor our Best Friend Express fixed route and Dial-A-Ride ADA complementary paratransit contractor providing our transportation services as noted in FTA C 4702.1B Chapter II, part 6 regarding contractor applicability.

The transportation contract between LSCOG and our procured operator references the need for Title VI non-discrimination compliance and also has the Required FTA Clauses placed directly within the contract. The contract between LSCOG and its procured service provider also has the Title VI Plan attached as an addendum. Currently our contractor, Aiken Area Council on Aging dba Aiken Senior Life Services, is also a rural 5311 grantee/subrecipient of South Carolina DOT and, as such, is required to sign a Title VI certification and assurances/complaint tracking forms for SCDOT each year. Contractors are asked each year by LSCOG if they experienced a Title VI complaint, investigation or lawsuit that was reported on their annual SCDOT tracking form submission. Our contractor is also advised to contact LSCOG immediately upon learning of a Title VI transit-related complaint and, if asked to do so by LSCOG, to participate in the ensuing investigation.

Aiken Area Council on Aging, doing business as Aiken Senior Life Services, receives assistance from LSCOG regarding Title VI by being supplied with a copy of the LSCOG Title VI Plan; having copies of Title VI notices placed on the transit buses and inside the transit lobby; and being

supplied with notebooks for each bus which contain copies of the complaint form and complaint process that our agency follows; provided in both English and Spanish translations.

IX. Title VI Equity Analysis

LSCOG is to submit as part of a Title VI plan, as stated on the FTA C 4702.1B checklist, *"A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc."*

LSCOG has not experienced any urban planning for facilities or built any urban transit facilities since our Title VI Plan was last approved, and there are no facilities planned for the coming three years.

X. Executive Board Resolution for Approval of Title VI Plan Submission

The LSCOG Executive Board Committee met on March 9, 2023, to approve the required Title VI Plan submission. A supporting board resolution may be found as "Appendix B" of this document.

XI. Service Standards and Service Policies of the Best Friend Express Fixed Route Service

Lower Savannah Council of Governments (LSCOG) provides three routes to serve the urbanized portion of Aiken County with the Best Friend Express fixed route system. Service standards are not expressed as "peak" or "non-peak" service times since the fixed route service is set up without such delineation. There is one mode of transit for the fixed route system, with no alternate modes such as commuter routes or rapid bus transit routes, etc. offered. LSCOG is of the opinion its system-wide service policies reflect a commitment to non-discriminatory transit operations and LSCOG has adopted the following practices to support non-discrimination:

XI. a. Vehicle Assignment and Transit Amenities

LSCOG provides to their procured contractor a fixed route fleet of up to five vehicles. Three vehicles are in active service during the day serving the three fixed routes; with up to two spare vehicles available for service, as needed. All vehicles, including spares when utilized, are to be rotated across the different routes. Supply chain issues has delayed vehicles currently on order and forced the Best Friend Express fleet to age, but it is still within the average Useful Life Benchmark. Vehicles are of a uniform bus size and seating capacity, with no vehicle older than 2017. The capital plan for fixed route vehicles acquisition includes approximately one new vehicle procured each year, on average. All vehicles are procured with the same specifications and amenities as the others including upgraded air conditioning, bicycle racks, ADA compliant features and lifts, uniform wraps. The same standards of cleanliness and maintenance are expected with each vehicle. All shelters available to the fixed route system shall have the same amenities as the other shelters with no preference given to any one particular location. There are no plans to increase the number of shelters serving the fixed route system.

XI.b. Vehicle Load and Vehicle Headway

Service on each of the routes operated by the Best Friend Express is provided on approximately two-hour headways. The headway on any given route may be reduced in response to higher load factors over a sustained period of at least two months, and with regard to funding availability. The load factor for all vehicles and routes is 1:1.

XI.c. On-Time Performance for Fixed Route and Service Accessibility

The Best Friend Express fixed route system is a "flag down" system in which passengers along the three routes may hail down the bus as it approaches them, with the exception of a small stretch of highway on one route where the speed limit exceeds 45 miles an hour and there is no safe shoulder for the bus to pull over or come to a stop. Passengers may also call to request a message be sent to the vehicle drivers (a software feature on vehicle installed tablets) informing them to "look" for passengers to picked up at a certain location along the route. The published schedule does select several popular locations along the routes and highlights the expected time the bus shall pass by that location. These published time "stops" and the three transfer locations form the basis of on-time performance since there are no physical bus stop signs lining the routes.

It is expected that the Best Friend Express will operate with 95% on-time performance. TripMaster software and AVL equipment located on the buses track schedule adherence within two minutes of early arrival and three minutes of late arrival for the published "stops" on the schedules; known as time points in the software system. Dispatchers monitoring the software are able to get in touch with the drivers with radios, or the mobile data tablets, to learn more about schedule adherence concerns as they are noted in real time. A vehicle is officially in violation of the on-time policy if it is either 10 minutes early or 10 minutes late to a "stop."

Appendix A – Limited English Plan (LEP)

Lower Savannah Council of Governments

Plan to Serve the Limited English Proficient (LEP) Persons Accessing Aiken County Transit Services

March 2023

Contents

Introduction 2
Assessment 3
Steps and Tasks Performed for a LEP Needs Assessment 3
Step One 3
Step Two 3
Step Three 4
Step Four 4
Summary of the Results of the Needs Assessment 4
Prior Experiences and Frequency of Contact 4
Service Area, Demographics, and LEP Populations 5
Best Friend Express Routes and Access 6
Resources Available 6
Recommendations of the LEP Plan 7
Monitoring, Evaluation and Updates for the LEP Plan 7
LEP and Low Income Mapping 8

Introduction

Lower Savannah Council of Governments is a direct recipient of Section 5307 public transit funds from the Federal Transit Administration (FTA) to serve the population of the urbanized portion of Aiken County, South Carolina. Lower Savannah Council of Governments (LSCOG) provides these transit services through a contract for the operation of the Best Friend Express fixed route and the Dial-A-Ride complementary ADA paratransit program. The Best Friend Express has three routes that serve the City of Aiken and City of North Augusta, as well as several small towns between the two cities. Dial-A-Ride is a demand response system for paratransit services operating within the ¾ mile service area surrounding the fixed routes. There is an opportunity to transfer to the larger Augusta (Georgia) public transit bus system across the river/border from Aiken County, as there is a cooperative agreement between the two areas being served by the same Metropolitan Planning Organization (MPO).

Lower Savannah Council of Governments receives federal financial assistance and complies with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. to provide services without discrimination in regard to race, color, or national origin. Lower Savannah Council of Governments and its transit contractor are also directed by Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)," reprinted at 65 FR 50121 (August 16, 2000), to develop and implement a plan by which LEP persons can meaningfully access transit services. Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." "Language Assistance Plan," or LAP, may be used interchangeably with LEP. These two terms are synonymous for the purposes of this document.

In developing an LEP plan, Lower Savannah Council of Governments followed suggestions provided in the U.S. Department of Transportation handbook for public transportation providers "Implementing the Department of Transportation Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient Persons," (April 13, 2007). This guidance outlined a four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the public transportation service area who may be served; 2) The frequency with which LEP individuals come in contact with fixed route or paratransit services; 3) The nature and importance of the services provided by the Best Friend Express and Dial-A-

Ride programs to the LEP population; 4) The resources available to Lower Savannah Council of Governments as the overall cost or financial burden to provide a LAP is considered.

Assessment

The first step to developing any LEP plan is to perform a needs assessment based on the four factor analysis suggested by USDOT.

Steps and Tasks Performed for a LEP Needs Assessment

Step One: *Assess the language needs in your transportation service area.*

Task 1: Examine the program's prior experiences with LEP individuals.

- Interview the front desk staff of Lower Savannah Council of Governments
- Interview the Mobility Managers of LSCOG
- Interview the Aiken Area Council on Aging (AACOA) call taking staff
- Query some Best Friend Express (BFE) and Dial-A-Ride (DAR) drivers

Task 2: Identify the geographic boundaries of service and match with Census 2020 data.

- Confirm the 5307 service area by map
- Check American Community Survey, sponsored by the Census Bureau, for the number of people who identified themselves as speaking English "less than very well."

Task 3: Try to identify any concentrations of LEP persons within your service area and try to confirm this presence through a check of other resources.

- One Stop Career Centers (DOL 39 Census languages/language clusters tabulations)

Step Two: *Assess the "frequency" with which LEP individuals come into contact with transportation services or transit programs.*

Task 1: Make sure to ask about frequency of contact during the interviews or surveys recommended in Step One, Task 1.

Task 2: "Consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups." – DOT Guidance Booklet

- Identify community organizations that might currently work with LEP populations in the service area and ask their opinion on the transportation needs of this population and their possible willingness to seek transportation services
- Is it possible to speak directly with members of an LEP population previously identified to gain their input?

Step Three: *Determine the "importance" of the 5307 program on the LEP population's ability to access health care, education, employment, information on emergency evacuations, etc.*

Task 1: Analyze existing routes. Do the routes serve areas of employment, education, health care and the concentrated areas of LEP populations who could reasonably access the routes?

Step Four: *Analyze available resources and the cost vs. benefit of providing language services.*

Task 1: Inventory language assistance measures.

- Is there existing translation services being used by LSCOG or the procured operational contractor?
- Are there existing resources or material within the local community organizations that could be utilized for transit?
- Is there material that could be used from national or state organizations? (i.e., Easter Seals, FTA, etc.)

Task 2: Cost analysis and creative budget opportunities.

- Acquire some price estimates or explore the cost of various language services (i.e., translating brochures)
- Are there any future plans identified for technology or service improvements in which the needs of a LEP population could be met?
- Is there someone who could be asked to serve on an advisory committee who could advocate for the LEP population and their access to services?

Summary of the Results of the Needs Assessment

Prior Experiences and Frequency of Contact

Dana Luttrull, Grants & Compliance Coordinator, of Lower Savannah Council of Governments transit department was able to interview LSCOG and transit contractor staff in January 2020 and Christine Chandler, LSCOG Transit Manager performed interviews in September 2022. This included front desk staff at both LSCOG offices and AACOA (Contractor) offices. Brenda Hoffman at the LSCOG front desk stated she did not receive any phone calls or walk-in customers with a non-English language need during this reporting period. Because of the pandemic and Covid-19 safety protocols put into place at LSCOG offices during much of 2020 and 2021, walk-in traffic was greatly reduced over the past three years. The transit operations contractor staff experienced a similar outcome at their place of work (Best Friend Express headquarters) with only one LEP customer contact recounted. There was also one phone request in 2022 to the transit service provider, from a local human service agency in Aiken, requesting the printed Spanish version of the Best Friend Express schedule be mailed out to one of their LEP clients who needed to access the fixed routes. The Aiken SC Works office is

on one of the Best Friend Express fixed routes and the Spanish translated route/schedules is available for job seekers at the front counter. Interviews with SC Works staff indicates the only other language experienced at their front desk is Spanish.

The vehicle operators of the Best Friend Express and Dial-A-Ride were interviewed twice over the past three years regarding their involvement with LEP passengers. None of the operators have experienced a passenger speaking with them in a foreign language. Two operators did state in the interview they think they have occasional LEP passengers but none of those passengers made contact or asked for assistance and managed to get on and off the vehicle without incident. A review of the completed ADA paratransit applications for Dial-A-Ride has not indicated a passenger has struggled to fill out the necessary forms to determine eligibility or requested language assistance.

Service Area, Demographics, and LEP Populations

Aiken County is 1,073 square miles from the U.S. Census 2020. The Census population estimate for July 1, 2021, is a total population of 170,776. The Best Friend Express routes have not been changed in the last three years and the service area remains the same. There are 170 miles of roadway traveled by the BFE fixed routes. The U.S. Census 2020 for Aiken County, SC lists a Hispanic or Latino racial makeup of 6.3% for the entire county. Asian "alone" percent is listed at 1.2% for the county in the Census 2020 Quick Facts. The Best Friend Express fixed route does not serve the entire geographic area of Aiken County, but rather is allowed to operate within the urbanized portion of Aiken County only.

For the entire Aiken County, this chart details 1% as the LEP population. Maps with the LEP populations surrounding the current fixed routes are located at the end of this document.

Language Spoken at Home by Ability to Speak English for the Population Ages 5 to 65+	
AIKEN COUNTY	
Total Population Falling Within Age Range	158,515
Speak English "Not Well"	1,033
Percentage	1%

Source: American Community Survey - US Census Aiken County Census Tracts 2020

LEP reports pulled from the SC Works Online Services (SCWOS) database owned and managed by the SC Department of Employment and Workforce (SCDEW) revealed low LEP results for Aiken County for the last 12 months.

SC Department of Employment and Workforce (SCDEW) SC Works Online Services (SCWOS) – "English Language Learner" Report	
(Last 12 Months)	
AIKEN COUNTY	
Wagner-Peyser	0 out of 1,192 applicants
Workforce Innovation & Opportunity Act	1 out 235 applicants

Best Friend Express Routes and Access

Part of a needs assessment is determining the importance of the 5307 program to the LEP population's ability to access health care, education, employment, information on emergency evacuations, etc. There is no doubt that the Best Friend Express has a fixed route that includes access to important community locations. An example of this is the following locations where the vehicles can currently pick-up or drop-off passengers: Department of Social Services; Social Security; Department of Health and Environmental Control; Aiken County Courthouse; Aiken Regional Medical Centers; Cancer Center; Margaret J. Weston Health Clinic; Council on Aging; Aiken Technical College; University of South Carolina-Aiken.

Resources Available

The fourth factor in an LEP needs assessment is an analysis of available resources and the cost vs. benefit of providing language services. Results from the assessment indicate Hispanic, or Spanish-speaking, residents make up the largest LEP community in our area. Lower Savannah Council of Governments plans to concentrate on Spanish language assistance measures as a result. Lower Savannah Council of Governments, as a direct recipient for the Aiken County 5307 FTA program, does have the financial resources to pay for a Language Assistance Plan.

Recommendations of the LEP Plan

LSCOG will continue to support written and electronic material in Spanish and post it on the Best Friend Express website, as well as keeping a supply of Spanish language hardcopies of schedules, Title VI notices, Title VI complaint processes, Title VI complaint forms, Dial-a-Ride applications, and brochures regarding the Dial-a-Ride ADA complementary paratransit program available to the public. This LEP Plan, as part of the entire Title VI Plan, will be posted to the website, as well.

LSCOG shall procure by March 31, 2023, a supply of Pocketalk Voice Translator(s) to aid in two-way voice translation. The selected translation aid can also provide language translation by taking a picture of written material. LSCOG will distribute the devices to the LSCOG front desk, the LSCOG Transit Manager, the transit lobby staff at the contractor's Best Friend Express headquarters, and the Best Friend Express operators (drivers) on each route. LSCOG will provide instruction on the use of the Pocketalk both internally, and directly with the transit service contractor (AACOA). Such training will take place before May 30, 2023. This device and training will assist future LEP persons accessing the transit services of the Best Friend Express transit system.

Priority on an improved Best Friend Express website bestfriendexpress.com shall be placed in SFY 2023-2024 to bring the current website up to date with mobile technology. With the use of Pocketalk translation devices now available, the transit website could be brought to the Pocketalk screen for a two way discussion regarding the routes, schedules, fares, and so forth. This update to the current website is also important to the traveling public using their smartphones while using public transportation.

Monitoring, Evaluation and Updates for the LEP Plan

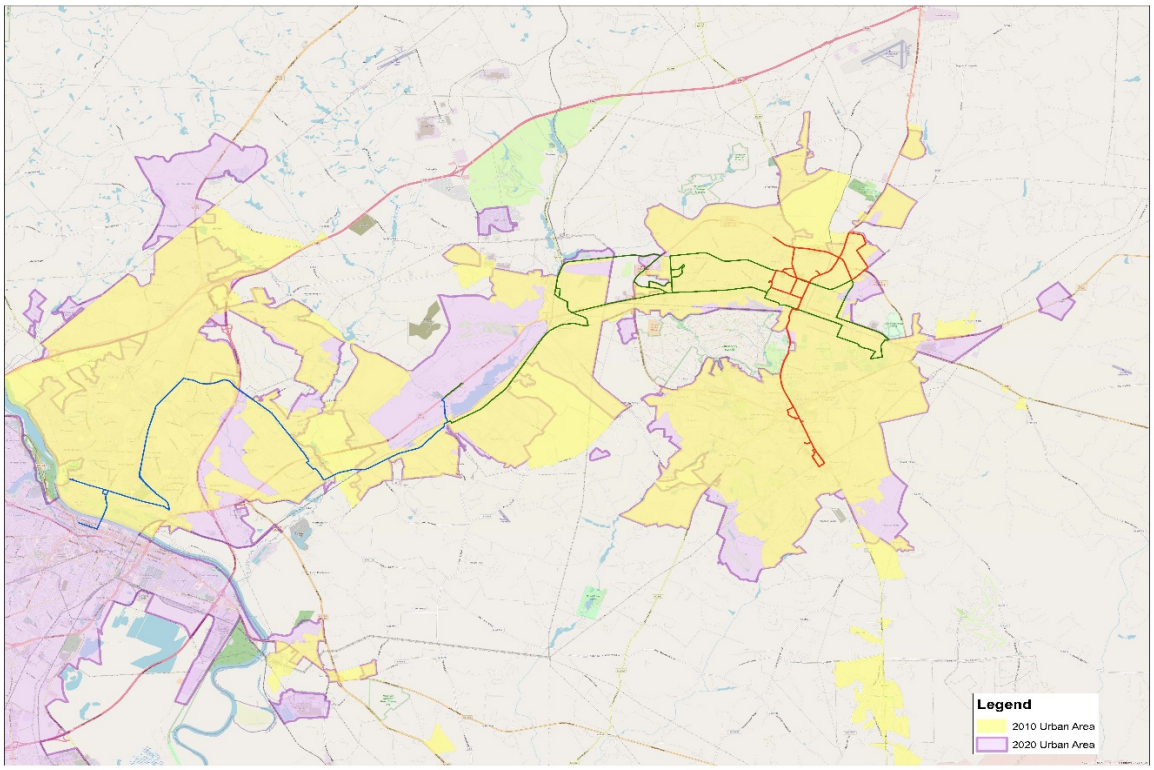
The LEP Plan shall be monitored, evaluated and updated under any of the following circumstances:

- The scheduling of a Triennial Review as sponsored by FTA;
- Notice of changes to, or release of a new, FTA Circular that addresses LEP Plans;
- Changes in technology experienced by LSCOG or its transit contractor that affect the public's transit experience;

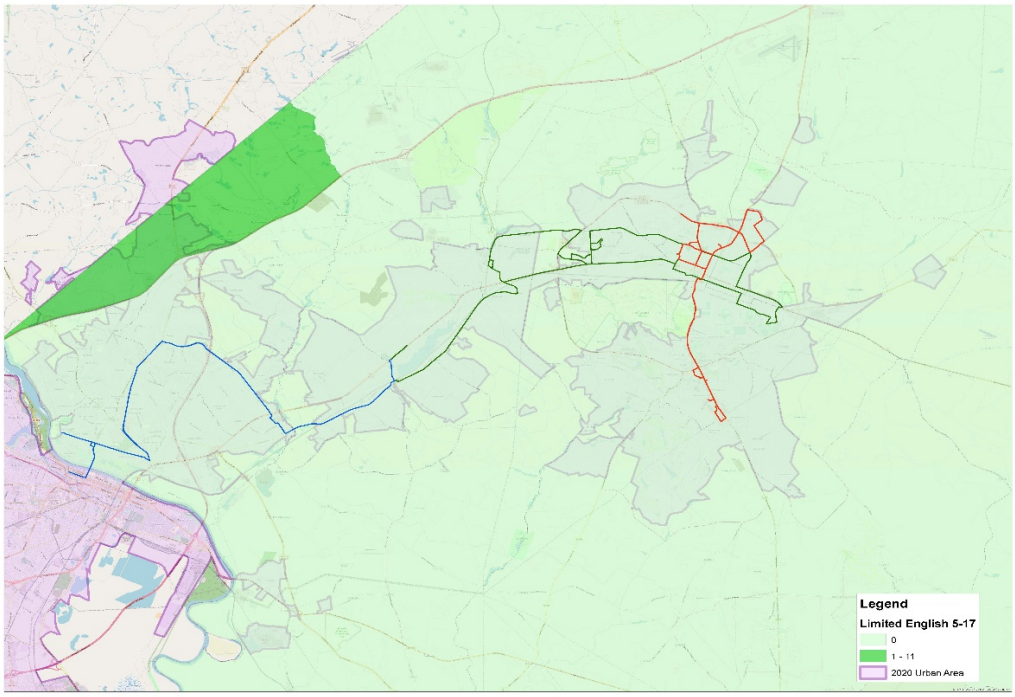
- Changes in existing routes or bus stops (in particular Step Three of a Four Factor Analysis would be revisited);
- Complaints received from LEP populations accessing public transportation.

LEP and Low Income Mapping

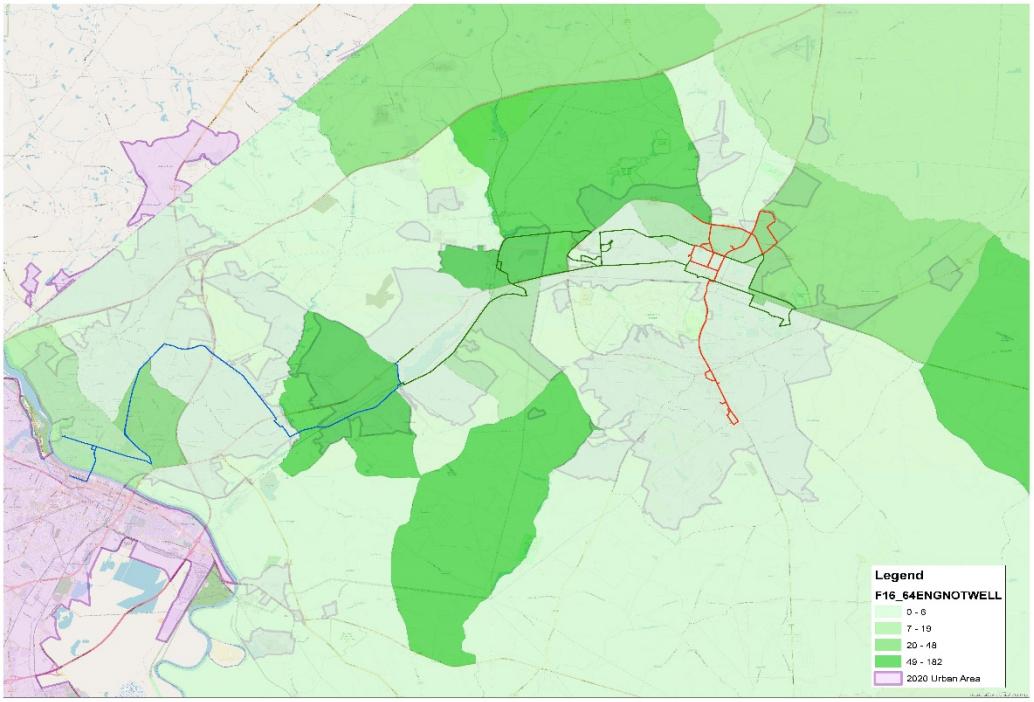
1. Best Friend Express Urban Area Comparison – 2010 to 2020 US Census



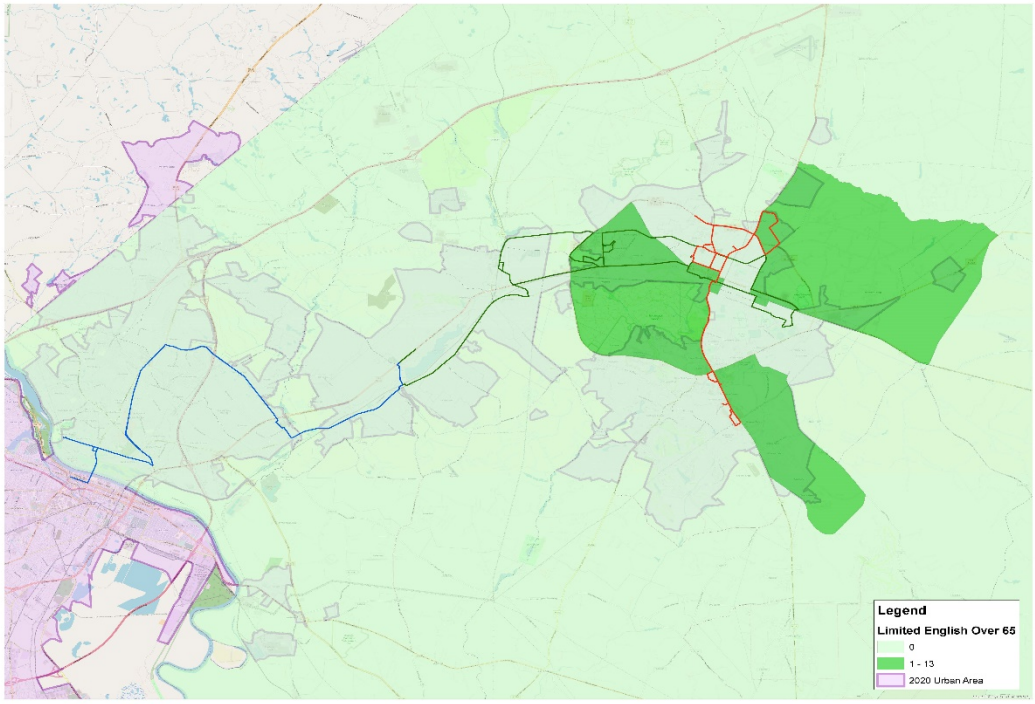
2. Limited English Proficiency Ages 5 – 17 (Source: 2020 US Census)



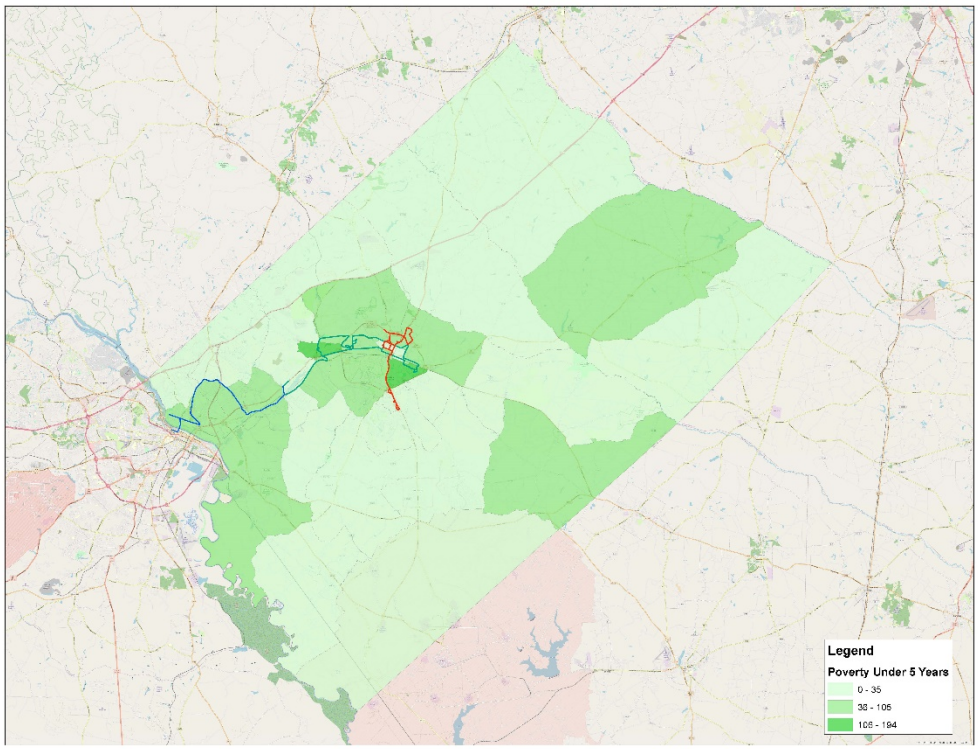
3. Limited English Proficiency Ages 18 – 64 (Source: 2020 US Census)

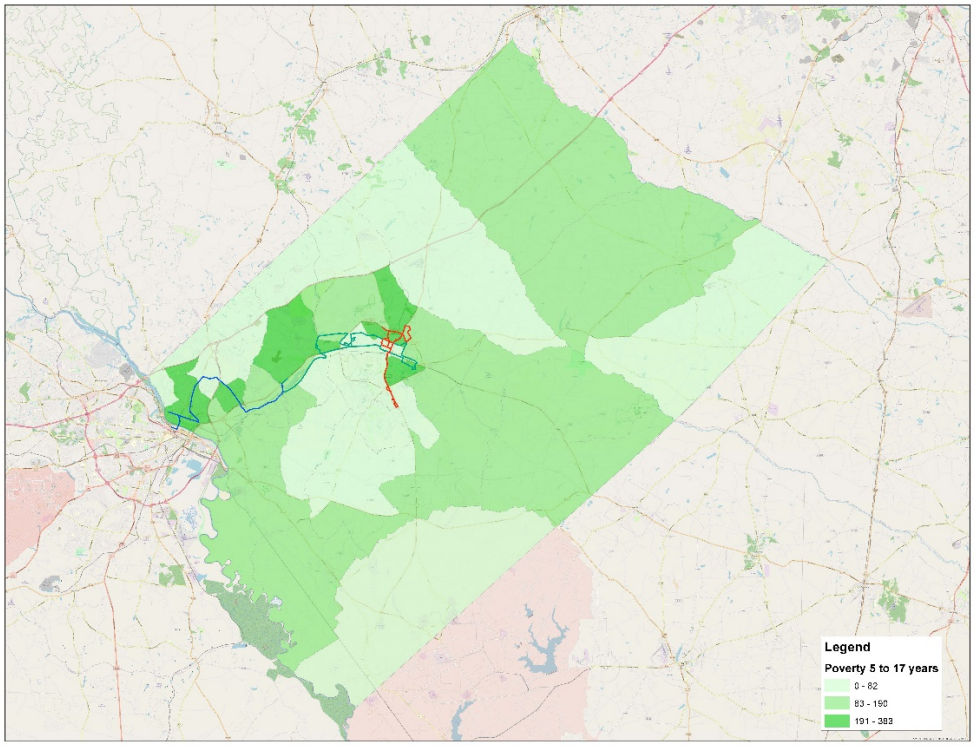


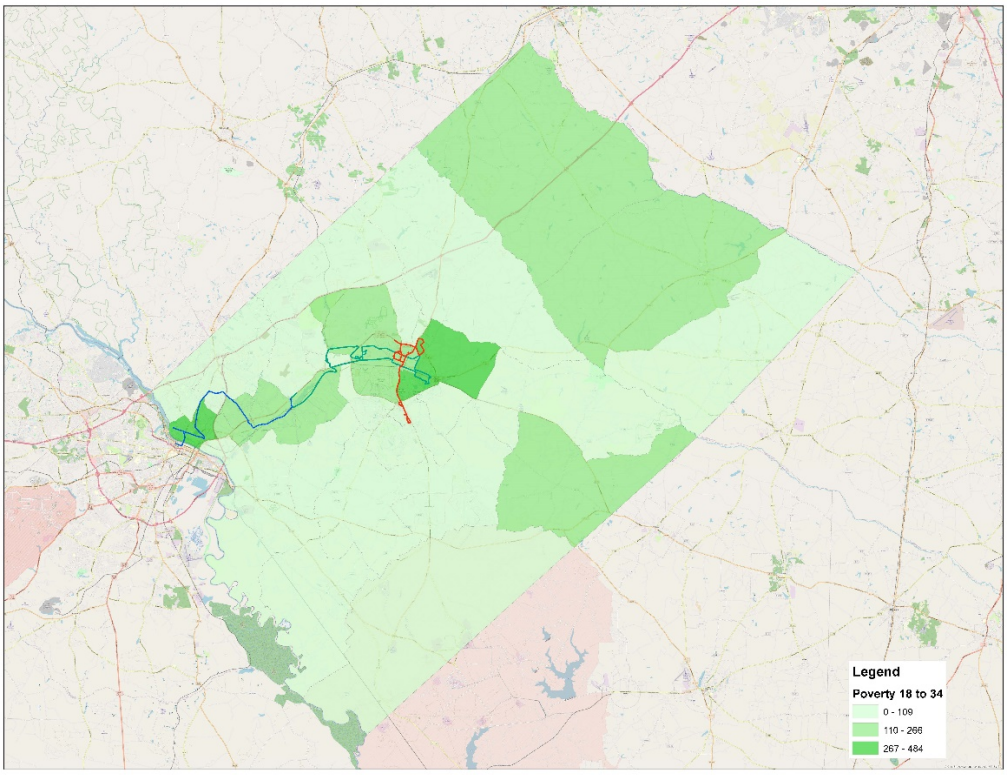
4. Limited English Proficiency Ages 65 and over (Source: 2020 US Census)

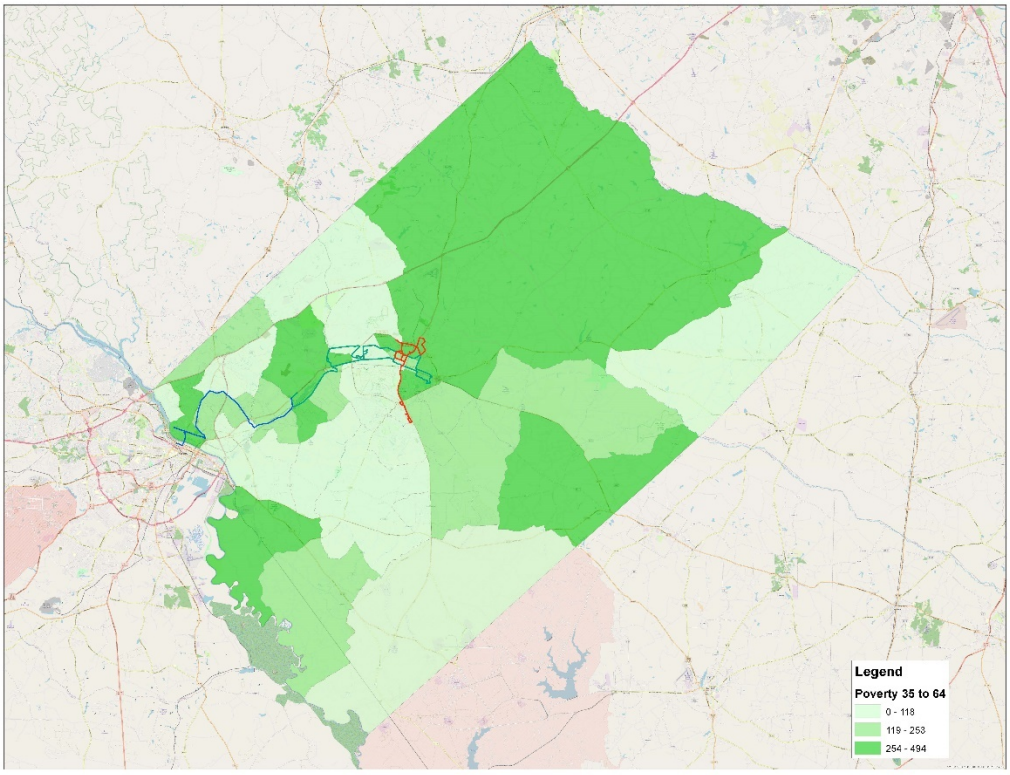


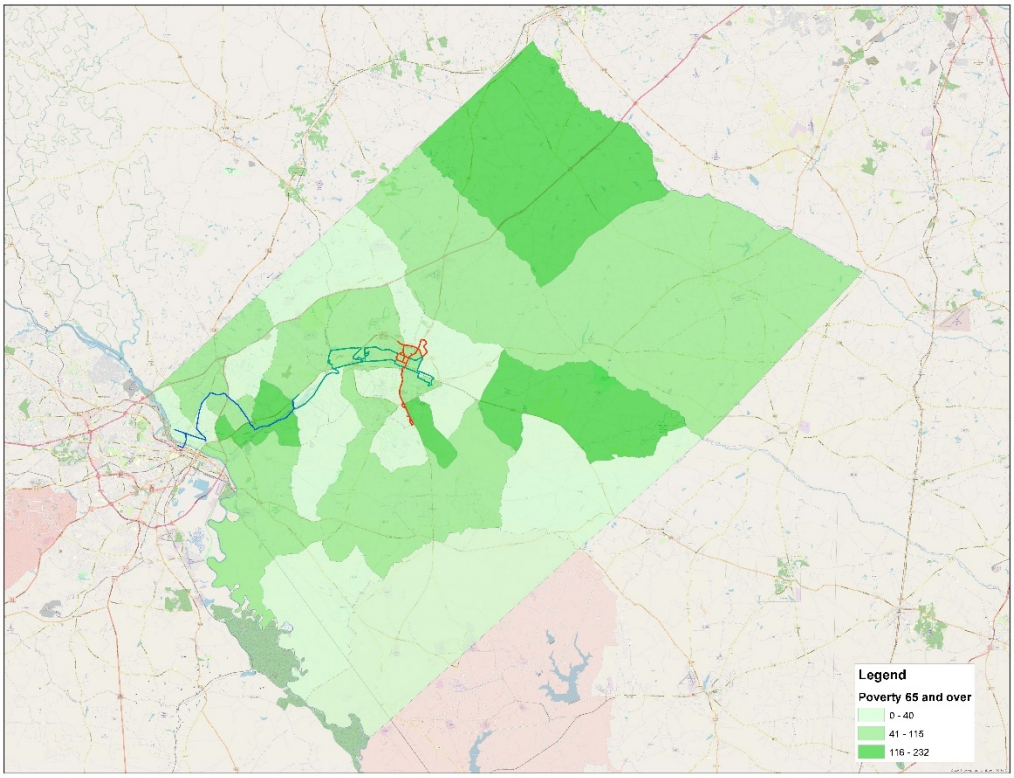
5. Poverty by Aiken County Census Tracts and Age (Source: 2020 US Census)






Legend
Poverty 18 to 34
0 - 109
110 - 266
267 - 484


Legend
Poverty 35 to 64
0 - 118
119 - 253
254 - 494


Legend
Poverty 65 and over
0 - 40
41 - 115
116 - 232

Appendix B – Executive Board Resolution

RESOLUTION

Executive Board of Lower Savannah Council of Governments
Title VI Plan for the Best Friend Express / Aiken County Transit

The Executive Board of Lower Savannah Council of Governments is aware of the Federal Transit Administration (FTA) program requirements for a new Title VI Plan every three years from recipients of Section 5307 public transportation funds. The Executive Board has been provided the full *March 2023 Title VI Plan* for review and now authorizes William Molnar, Ph.D., or his assigned staff, to submit to FTA this approved Title VI Plan for compliance of FTA Circular 4702.1B "Title VI Requirements and Guidelines for FTA Recipients" in support of the Civil Rights Act of 1964. The submission to FTA will include an Appendix to the Title VI Plan with Lower Savannah Council of Governments' language assistance plan for "Limited English Proficiency" (LEP) persons in order to assist the LEP person's access to public transportation.

Title VI of the Civil Rights of 1964 states that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (42 USC Section 200d). This Title VI Plan ensures any passenger of the Best Friend Express transit system has recourse and remedy for Title VI discrimination claims and Lower Savannah Council of Governments presents transit Service Standards that provide an equitable distribution of transit assets and services across the transit system.

Approved and adopted this 9th day of March 2023.

James E. Hayler
Signature LSCOG Executive Committee Chairperson

James E. Hayler
Printed Name

Witness Signature

William Molnar
Printed Name