

# TITLE VI PLAN

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

February 1, 2020

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## 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.

For more information on your civil rights under Title VI or information on filing a discrimination complaint contact:

Lower Savannah Council of Governments  
2748 Wagener Road  
Aiken, SC 29801  
(803) 649-7981  
[www.bestfriendexpress.com](http://www.bestfriendexpress.com)

### 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](http://www.lscog.org)) has the Title VI Complaint Process and Complaint Form posted under Departments → Transportation → Links → Title VI Complaint Process;
- The Best Friend Express and Dial-A-Ride website ([www.bestfriendexpress.com](http://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;
- 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 copies of the 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 Contacts**

The Lower Savannah Council of Governments (LSCOG) is authorized, and required, to implement an 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.

A Title VI Complaint Form is available at many locations including the LSCOG website, the Best Friend Express website, the front office of LSCOG, or from one of the Best Friend Express drivers. You may also request a form be provided to you directly from LSCOG. If you would like to file your written complaint, please contact:

Lower Savannah Council of Governments  
2748 Wagener Rd  
Aiken, SC 29801  
803-649-7981

Please contact Nora Sanders, Assistant Executive Director  
Or  
Lee Willing, Director of Human Services  
Or  
Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Ave. SE  
Washington, DC 50290



**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** (required)

### III. Title VI Complaint 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 received 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 him/her 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 their review of the full 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 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 thirty (30) days to do so from the time he/she receives the closure letter, or the Letter of Finding. This complaint procedure will be made available to the public on the Best Friend Express website, or provided upon request in another format by LSCOG.

#### 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.

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.

#### 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 December 7, 2017 and can be accessed at the City of Augusta website; Planning Department page. The plan outlines such things as public notification and outreach strategies and the new 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. Because of this level of independence from the MPO and Augusta Transit, LSCOG also addresses additional public participation and access needs for the Best Friend Express passengers and Aiken County residents.

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 that 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.

One of the strongest outreaches to the public that LSCOG continually offers is the work of mobility managers. Since 2009 mobility management staff has been available to the public to answer all inquiries for information about transportation options in their communities, including both public transportation and other human service transportation services. They are also available to serve as a transit advocate on any requests LSCOG receives from other groups and sectors in the community for transit stakeholder participation. Mobility managers are located within LSCOG (Aging, Disability & Transportation Resource Center – ADTRC) offices.

## 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;
- LSCOG sponsors and attends public participation meetings in Aiken County regarding the TIP, UPWP, and the long range Metropolitan Transportation Plan (MTP – replacing the former LRTP document). Including:  
Aiken County Government Center Sandlapper Room, 1ST Floor 1930 University Parkway, Suite 2800, Aiken, SC 29801 August 21, 2017 5:00 PM to 7:00 PM  
and  
Aiken County Government Center Sandlapper Room. 1st Floor. 1930 University Pkwy, Aiken, SC 29 Wednesday, January 24, 2018 5:00 pm to 7:00;

- Best Friend Express on-board passenger surveys in 2017 by consultants Tindale-Oliver and in 2018 by Augusta Planning & Development Department;
- Public meeting in Aiken to unveil the newly completed Transit Development Plan (TDP) and answer questions from elected officials, staff and the general public in June 2018;
- Attendance and transit presentation during a Legislative Breakfast in December 2019 held at LSCOG offices;
- Presentations regarding public transit by the LSCOG Transit Manager to various groups including Wyndham House, Croft House, Cumberland Village senior living facilities and SCDOT Vocational Rehab in Aiken;
- Attendance and participation at the Transit Association of South Carolina annual conference and then quarterly, regional workshops.

## 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).

## VIII. Monitoring of Subrecipients and Contractors for Title VI

Lower Savannah Council of Governments is a 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 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; 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. Copy of Board Meeting Minutes for Approval of Title VI Plan Submission

The LSCOG Executive Board Committee met on January 9, 2020 to approve the required Title VI Plan submission. Supporting board minutes 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. Currently, the Best Friend Express fleet is 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 RouteMatch Software feature on vehicle installed tablets) informing them to “look” for passengers to be picked up at a certain location along the route. The published schedule does select several prime 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. RouteMatch 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 800 MHz radios, or the mobile data terminals, 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

February 1, 2020

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## 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 regards to gender, race, religion, 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,” 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.” An emerging title that may be replacing the term of “LEP,” is a “Language Assistance Plan,” or LAP. 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 LEP language assistance 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. Lower Savannah Council of Governments originally completed its first needs assessment in the first quarter of 2009. An outline of the steps / tasks taken for the assessment may be found below. There have also been LEP reviews / updates performed on five additional years since 2009.

### 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 2010 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. Such as:

- School Districts (Home Language Surveys or state testing statistics)
- 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 AACOA?
- 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 a future funding opportunity that could be utilized for language services?
- Is there a community volunteer available for language assistance? 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, Grant Compliance Coordinator, of Lower Savannah Council of Governments was able to interview LSCOG and contractor staff in December 2019. This included front desk staff at both LSCOG offices and AACOA (Contractor) offices. Surprisingly, neither receptionist(s) could recall any phone calls coming into their offices over the last three years where another language besides English was spoken. When asked if anyone “walked into” the offices speaking another language or in need of assistance, I was told of approximately three occasions

when this took place over the last two years. Each visitor had someone with them who made the translation on behalf of the individual.

The vehicle operators of the Best Friend Express and Dial-A-Ride indicate they are not transporting any passengers they believe are experiencing a language barrier. The Green Route BFE operator says he has one male passenger who he thinks may have an English language challenge, but he still rides often and has not struggled to understand the fares or the bus stops, so the operator was not sure. 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 has requested assistance. LSCOG has received only one completed application for the Dial-A-Ride paratransit program in Spanish. The mobility manager was able to send it to a translation service with a two-day turnaround. The Dial-a-Ride acceptance letter (and all other DAR letters and written material) had been previously translated into Spanish so it was not a struggle to mail a letter that the passenger was able to read.

Inquiry into the local SCWorks database through the LSCOG Workforce Development department revealed that the SCWorks office in Aiken County (and the other five counties in the Lower Savannah region) does not track LEP contacts. An interview with a front desk staff member at the Aiken location did say they have distributed the Best Friend Express (Spanish version) schedule to their clients on rare occasions since there is a bus stop location in front of the SCWorks office. This same person indicated there has not been a language other than Spanish spoken at their front desk.

## Service Area and LEP Populations

Aiken County is 1,073 square miles with a U.S. Census 2010 total population of 160,099. There are 170 miles of roadway traveled by the BFE fixed routes. The Hispanic population represents five percent (5%) of the total population for the entire county. 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. It is estimated from the 2017 ACS that a Hispanic population of 1.99% would have an “origin pick-up” fall within the current transit urbanized service area.

## 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, such as it is, in our region. 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 the Spanish translation and continued printing of certain transportation related material; the benefit of being able to serve Hispanic persons for transit needs outweighs the financial "burden" of not offering this language assistance.

## Recommendations of the LEP Plan

LSCOG will continue to produce 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. This LEP Plan, as part of the entire Title VI Plan will be posted to the website, as well.

LSCOG staff will continue to have access to “Language Line Solutions” business services for any phone calls or walk-in customers experiencing a language barrier. This would allow staff to serve persons using a multitude of languages besides Spanish.

The [www.bestfriendexpress.com](http://www.bestfriendexpress.com) website should be modified and updated to operate fully on mobile phone screens and not just on computers. A Spanish version of the entire website should be considered at the same time, as well. This would bring more independence and better access for any Hispanic LEP population wanting to understand the routes and how they can use the transit system.

## **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.

Appendix B – Board Minutes

**LOWER SAVANNAH COUNCIL OF GOVERNMENTS**  
**EXECUTIVE COMMITTEE MEETING**

**Minutes**  
**Teleconference**  
**January 9, 2020**

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**CALL TO ORDER**

Chairwoman Dorothy Riley called the meeting to order at 12:02 pm.

**ROLL CALL**

The following board members were on the call:

Aiken County  
Roger Boyd

Allendale County  
Dorothy Riley, Chair  
Larry Cohen(MM)  
Bill Robinson(Alt)

Bamberg County  
Larry Haynes, Past  
Chairman  
Jerry Bell  
Sharon Hammond(MM-Alt)

Barnwell County  
David Kenner, Treasurer  
Freddie Houston (MM-Alt)

Calhoun County  
Roger Hill

Orangeburg County  
Harry Wimberly  
Janie Cooper-Smith (MM)

The following members were absent or excused:

Aiken County - Andrew Siders (Vice Chairman) (Ex), Allendale County - Theresa Taylor (Ex), Barnwell County - Ben Kinlaw (Ex)

The following staff were on the call: William Molnar, Executive Director, Frances Owens, Finance Director, Nora Sanders, Assistant Executive Director, and Rhonda Mitchell, Transit Manager

**Title VI Compliance Requirement**

Chairwomen Riley requested approval of the tri-annual Federal Transit Administration (FTA) Mandatory Review and Update of the Title VI Plan. The Plan ensures that no person using the Best Friend Express fixed route or Dial-A-Ride paratransit services are denied the benefits of public transit based on race, color or national origin.

Motion made by Larry Haynes, second by Roger Boyd. The motion carried unanimously.

**Retaining Auditor for an Additional Year**

Dr. Molnar requested that LSCOG retain the current auditing firm, McKinley, Cooper & Co., for one more year because the LSCOG is in the process of converting our financial software and timekeeping systems over. Retaining the auditing firm for an additional year would make the transition smoother.

There was discussion concerning keeping the auditor due to some past issues. There was a request from Mr. Larry Cohen to retain the auditing firm for another year with conditions that need to be discussed with the board prior to signing the extension.

Mr. Larry Haynes made the motion to extent the contract for the auditor for an additional year, seconded by Ms. Janie Cooper-Smith. The motion carried unanimously.

**Executive Director's Report:**

Dr. Molnar reported that the next meeting of LSCOG Board would be Thursday, February 13, 2020 in Orangeburg. Once the location has been confirmed, information will be sent out. The SC Power Team and Edisto Electric have been asked to present that night.

The board members on the call were ask to think about ways to increase LSCOG board member attendance at future meetings. It was requested that this topic be brought up at the next full board meeting.

**General Discussion:**

There was no general discussion.

Chairwoman Riley adjourned the meeting at 12:18 pm

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'W. Molnar', with a long horizontal line extending to the right.

Dr. William Molnar  
Executive Director

NOTICE OF THE MEETING AND A COPY OF THE AGENDA FOR THE MEETING WAS DISTRIBUTED TO LOCAL NEWS MEDIA PRIOR TO THE MEETING AND A NOTICE OF THE MEETING POSTED ON LOWER SAVANNAH COUNCIL OF GOVERNMENTS BULLETIN BOARD AT LEAST 24 HOURS PRIOR TO THE MEETING.