

**THE BCD RURAL TRANSPORTATION MANAGEMENT ASSOCIATION
(TRICOUNTY LINK)**

The rural transit provider for the Berkeley-Charleston-Dorchester Region
announces updates to the Title VI Public Participation Plan

This document is available for public review and comment for fourteen (14) days
from the date of this notice between the hours of **9:00 am to 5:00 pm**,
Monday-Friday at the

Berkeley-Charleston-Dorchester Council of Governments
5790 Casper Padgett Way, North Charleston, SC
843-529-0400 or at
www.RideTriCountyLink.com

These are final policies unless comment is received that would constitute a
substantial change is presented

The BCD RTMA does not discriminate on the basis of age, race, color,
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or access to, or treatment or employment in, its federally-assisted
programs or activities. Persons needing assistance in obtaining
information can call: RELAY SC #711

The Berkeley-Charleston-Dorchester
Rural Transportation Management Association

Title VI Report:
Public Participation Plan

Prepared for
The Federal Transit Administration
Office of Civil Rights

February 2022



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www.rideTriCountyLink.com

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Non-Discrimination

TriCounty Link operates its programs and services without regard to race, color, and national origin in accordance with the Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with TriCounty Link.

For more information on TriCounty Link's Title VI Policy and the procedures to file a complaint, contact the Title VI designee, Robin Mitchum at (843) 529-0400; email RobinM@bcdkog.com; or write to the Title VI Coordinator at 5790 Casper Padgett Way, North Charleston, SC 29406. For more information visit the Title VI Program page at <https://ridetricountylink.com/871/>.

A complainant may file a complaint directly with the SC Department of Transportation by contacting the Title VI Program Coordinator, P.O. Box 191, Columbia, SC 29201-0191.

If information is needed in another language, contact (843) 529-0400

~Si se necesita información en otro idioma llame al (843) 529-0400

Introduction

In accordance with federal guidelines, TriCounty Link developed a Public Participation Plan (PPP) that strives to involve all stakeholders while recognizing that minorities, low income are other populations need additional outreach. This plan documents the actions to be carried out by TriCounty Link to ensure that opportunities exist for the public to be involved in transportation planning activities. The public participation policy is designed to ensure opportunities for the public to express its views on transportation issues and to become active participants in the decision-making process.

Public Participation Plan Goals

Goal 1: Inform the Public of its Role in the Transportation Planning Process

TriCounty Link will educate and present information about the regional transportation planning process to the public as needed or requested. The transportation planning process includes plans, programs, and projects.

Goal 2: Solicit Public Input and Facilitate the Information Flow between the Public and Decision-Makers

TriCounty Link will strategically identify opportunities for public participation in the development of all transportation plans, programs, and projects. TriCounty Link will schedule and organize meetings where the public can provide feedback on transportation plans, programs, or projects. TriCounty Link is responsible for compiling public comments into complete and concise documents for presentation to the decision-makers. Likewise, all policy meetings, where decision-making is conducted, will be public and provide the opportunity for public comment.

Goal 3: Develop, Maintain, Evaluate, and Improve Outreach Methods

TriCounty Link will employ strategies and techniques that ensure meaningful public participation, while establishing a process for evaluating and improving these outreach methods over time.

Public Meeting Principles

Public meetings are held for a variety of reasons, and different levels of public input are expected. The purpose of these meetings is threefold:

1. To confirm the purpose and intent of the plan or project;
2. To present the trends and forecasts for the region; and
3. To gather public input

Actions of meetings may result in the adoption or approval/disapproval of the TriCounty Link policies, procedures, service modifications, budgets, procurement and expenditures, and/or allocation and suballocation of FTA programs. Other actions include adoption of resolutions for amendments, adjustments, endorsements, special plans and reports.

Early Involvement

Early involvement with local community leaders will help to determine suitable meeting forums and information formats to foster valuable input, especially when soliciting input from disadvantaged populations.

Understandable and Interesting Language/No Jargon

Meeting notices and materials will use appropriate, understandable language — acronyms and other technical jargon will be avoided to the extent that is possible to the subject matter. Efforts will be made to tailor advertising, project campaigns and slogans to generate the most interest possible. The Agency will make reasonable efforts to address identified language barriers in order to provide meaningful access to information on its plans and programs.

Accessibility

TriCounty Link meetings and public review meetings shall be held at a location and time that is convenient and accessible. When there are a series of public meetings being held throughout the region on a certain plan or program, at least one-quarter of these meetings shall be held at a time and location that is accessible by public transit.

Public Notification Procedures

Meetings notices shall be advertised in the Charleston Post & Courier newspaper or the more localized community newspaper, such as the Berkeley Independent (owned by the same company) and documents shall be made available in draft form for public review and comment (in the offices of TriCounty Link, at least fourteen (14) days prior to the Board Meeting where action is scheduled). Notices will also be sent to media outlets that focus on minority population in the community. These outlets include:

- La Raza 103.9 – Hispanic Radio Station
- Jabr Communications, 5081 Rivers Ave, Charleston, SC 29406
- WJEA Channel 12 - Hispanic TV Station

Outreach Tools and Techniques

The type of public outreach efforts employed for a particular project will be determined based on the project's overall regional and local impact. Highly localized projects may require more specialized outreach within the project's area of influence, rather than the broad outreach efforts required by others. Extensive outreach efforts throughout all areas of the region are conducted in order to assemble a broad cross-section of input into the decision-making process, including traditionally underserved areas. TriCounty Link's outreach efforts in these areas will continue to provide these residents with an opportunity to voice their opinions and concerns. TriCounty Link will continue to conduct, sponsor, and participate in special and community events that reinforce the mission and strategic plan of the organization, educate the public, and provide opportunities for public input.

Tools

TriCounty Link's approach in publicizing its public meetings may include the following outreach methods:

Public Notices

Public notices and/or advertisements will be placed in newspapers, in addition to major regional newspapers deemed appropriate for the project. Public service announcements and meeting advertisements will be sent to popular minority and ethnic radio stations. Whenever possible and appropriate, public service announcements and meeting advertisements will be sent to the public access cable television station, in addition to regional network stations. A list of regional newspapers will be maintained by TriCounty Link staff and made available on request.

A Notice of Title VI protection is posted at numerous locations throughout the Transit system. These notices inform members of the public of their protections under the Law and the procedure to contact TriCounty Link staff to file a complaint. Specific locations where these notices are posted include the transit vehicles, the administrative offices at 5790 Casper Padgett Way, North Charleston, SC 29406, the operations office at 305 Heatley St., Moncks Corner, SC 29461 and the system website.

Paid Advertising

Various projects may require additional paid advertising in the form of newspaper, radio, or television ads. These will be more detailed than a standard Public Notice.

Newsletters

TriCounty Link produces and distributes a periodic newsletter that includes articles and other information of interest on TriCounty Link's plans, programs, studies, and service modifications.

Flyers/Posters

When appropriate, participation from target populations will be sought by posting flyers/posters and meeting notices in locations such as government centers, neighborhood shops, religious institutions, social service agencies, employment centers, bus stops/transit hubs, senior centers, public health clinics, public libraries, community centers and popular meeting places. Postcards and flyers may also be distributed directly to residents.

Traditional Letters

When appropriate, traditional letters about plans, studies, projects or any other information deemed important for public input will be mailed out to interested parties, public libraries and to members of the advisory committees.

Press Releases

Press releases will be released to ensure interested parties and the press is up-to-date on news and information concerning TriCounty Link activities. The TriCounty Link website will be employed as a tool for disseminating information on meetings, project updates and background. TriCounty Link's website is a tool to describe and visually represent TriCounty Link's plans, programs, meetings, and other appropriate information. A calendar is included on TriCounty Link's website displaying scheduled committee meetings. Staff shall post draft documents on the website for public review and comment. The website shall contain, but not be limited to:

- Brief descriptions of current projects with available maps, photos, renderings
- Work products and publications
- Links to related agencies and planning partners — SCDOT, FHWA, etc.
- Current operating procedures
- A listing of current TriCounty Link member jurisdictions
- Meeting calendars with agendas as soon as feasible
- Contact information — mailing address, phone, fax and e-mail address
- Profiles of TriCounty Link staff with current responsibilities

Mailing databases

The assembly of a database of names and addresses of social and civic groups, neighborhood and community associations and interested individuals will assist in the public outreach for the Public Participation Plan and other plans. The electronic list of names will serve as a mailing list for notification of meetings. Particular efforts will be made to include low-income, minority, disabled and non-English-speaking populations. To supplement the database, members of the public will be asked if they would like to be included on a mailing list as a part of comment forms dispensed and collected at public meetings. Mailing and e-mail addresses will be requested. E-mail messages and/or postcards will be sent to individuals and groups notifying them of meetings, in addition to the notices that are distributed to the local media.

By providing the opportunity for everyone to participate in the transportation planning process, TriCounty Link ensures that the needs of all people can be met and that their desires for how the whole community should function and develop will be considered. To accomplish this, TriCounty Link staff uses Census data to determine where concentrations of the underserved or underrepresented reside. Using this data, staff does the following:

1. Holds public meetings that are convenient to these geographic concentrations of low income and minority districts in terms of walk-ability and available transit options, which tend to be used more by low-income individuals than other forms of transportation;
2. Makes all draft documents available for public review via the techniques described above;
3. Residents or organizations that express an interest by attending public meetings or notify TriCounty Link by other means are included in the direct mailing list to receive information about future events and plan development;
4. Continues to research creative methods of reaching these populations with information, documents, and invitations other than the techniques listed within this document;
5. Seeks out community leaders or representatives of these groups to participate in planning processes as appropriate and
6. Meets and makes presentations to organizations that represent these segments of the population as requested.

Website

The TriCounty Link website, www.RideTriCountyLink.com, will be used to disseminate information and collect public input regarding all transportation activities. The website may contain, but is not limited to:

- Meeting calendar and agendas
- Procurement opportunities
- Current project descriptions, with available maps, photos, or renderings
- Work products such as the service plans
- Regional statistics
- Transit route information
- Newsletters and information for sign up
- Links to social media sites (Facebook, Twitter, etc.)
- List of standing committees and a regional directory of participating jurisdictions
- Listing of staff contact information

Project specific websites may be built and used for activities such as Lowcountry Rapid Transit as well. These sites are used to attract a larger audience for specific topics and will be linked to the BCDCOG website and other regional entities.

Social Media

Social media is an excellent tool to cultivate two-way digital communication which can lead to awareness of transportation plans, programs, and projects. The primary forms of social media that may be used are Facebook, Twitter, Instagram, and YouTube. If other forms of social media transcend the current formats, those will be explored as well. Social media can be used to augment other efforts, such as building outreach contact email lists.

Email Lists

Email is an effective tool to communicate quickly for transit-related activities. During public meetings, members of the public will be asked if they would like to be included on a mailing list to receive more information about the specific topic they are attending. Lists will be created and maintained for specific

plans, programs or projects that are seeking public feedback. A specific email address for an individual transportation activity may be established on a project-by-project basis, if needed.

Comment Cards

Comment cards will be used to gather feedback at public meetings.

Pop-Up Meetings

Pop-Up Meetings will be used to gather public input at events or locations that attract people for a different reason. For instance, a high-school football game or a farmer's market could be a great way to solicit public feedback on a nearby transportation activity.

Advisory Committees

From time to time, an advisory committee may be established to help work through a transportation planning activity.

Paid Advertising

Various projects may require additional paid advertising in the form of newspaper, radio, or television ads.

Surveys

Transportation activities may require surveys to understand public sentiment. Different applications may be used such as statistically valid telephone surveys, online surveys, or on-vehicle data collection.

Online Interactive Maps

Interactive maps that are hosted online may be used to gather public feedback from time to time. An example of an online interactive map would be one where end users could draw preferred transit routes across a specific geography in an effort to either show the most used facilities or to add new facilities.

Public involvement needs to encompass the full range of community interests, yet people underserved by transportation often do not participate. Not only are they frequently unaware of transportation proposals that could affect their daily lives, but they also may have no means to get to a public meeting or have long work hours that preclude them from attending. Many citizens do not participate in public involvement activities, even though they have important, unspoken issues that should be heard. Some may have a deep mistrust for public officials and government offices, while others may be discouraged from participating due to cultural values. The following strategies for engaging minority and low-income populations (FTA Circular 4702.1B) will be employed.

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities
- Employing different meeting sizes and formats
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts

- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments

Virtual/Online Engagement

Virtual or online meeting platforms may be used to supplement, but should not replace in-person engagement. Virtual meetings can serve as a cost-effective tool to increase public engagement, since they allow individuals increased flexibility to participate and provide a viable option to persons with limited transportation options. In circumstances where in-person meetings cannot be conducted safely (public health emergencies or disaster recovery) virtual meetings may be deemed necessary and should be utilized temporarily until conditions allow for in-person meetings to resume safely. Information/instructions on how to participate in virtual meetings, including opportunity to provide comment, will be made available to the public.

Public Participation Process for Fare Changes

Prior to request for Board adoption, staff will schedule, conduct outreach, and solicit public input in accordance with TriCounty Link's Public Participation Plan. Outreach effort will include a 30-day comment period on the proposed changes and the accompanying federally required Title VI fare equity analysis. Prior to holding the public meetings, TriCounty Link will prepare and distribute a notice to riders and members of the public.

The public notice will include:

- A title and brief description of the proposed changes and a statement that TriCounty Link is seeking public comments.
- Notice of documents available for review (e.g., draft fare structure proposal(s), Title VI equity analysis, and/or environmental documents).
- The date, time, and location of the public meeting(s) and transit routes serving the location.
- Contact information and where to find additional information.
- The final date and time to submit comments.

TriCounty Link will post the notice on TriCounty Link's website and will accept comments on the proposed fare changes for at least 30 calendar days. The notice will be posted in English as well as any non-English languages determined by the policy on language assistance. TriCounty Link will also provide information on the hearing in TriCounty Link vehicles, at major stops and stations, and to applicable mailing list subscribers. TriCounty Link may also notify riders through press releases or through social media.

Upon request, and given advanced notice of at least 3 business days, TriCounty Link will provide an interpreter (including sign language) at the public meeting. TriCounty Link's translator service also provides interpretation services over the phone for patrons calling for additional information, to make comments, or to arrange interpretation services at the public hearing.

Comments received through the public meeting(s) and comment period will be analyzed, evaluated, and reported to the Board. Changes may be made to the recommended fare structure and pricing, and/or additional options considered as a result of public input.

In adopting fare changes, TriCounty Link will comply with all relevant laws and regulations governing fares, discounts, and farebox recovery. These include the Federal Title VI of the Civil Rights Act of 1964 and Executive Order 12898, addressing equity and Federal funding guidelines addressing fare discount.

Given the intended infrequency of fare changes, staff must examine how and where fare levels are posted and communicated. The intent is to clearly convey current fare levels and plans for routine, modest changes, efficiently. In addition to posting fares on ticket vending machines, staff will post current fares on-line and guide customers to that site in marketing and communications materials. Staff will likewise strive to minimize the administrative burden and cost of changing fare media, by leveraging technology solutions like mobile phone and smart card payment mechanisms.

Public Outreach Opportunities

As part of the public outreach to minority and low-income populations, TriCounty Link participates in the regional Black Expo held in the City of North Charleston, the Charleston Green Fair, and the Summerville Flowertown Festival, the North Charleston Earth Day Festival, the Mexican Consulate events and other opportunities as they arise. The BCDCOG hired a Communications and Outreach specialist, whose focus is mainly on the Lowcountry Rapid Transit Project, however she is hosting office hours in locations around the region where feedback can be received on any transportation project. This has been a successful program to engage local businesses and community members in transportation programs and bring outreach to various locations throughout the area.

TriCounty Link also continues to partner with the SC Department of Health and Environmental Control, the Medical University of South Carolina, the Lowcountry Aids Services, the University of SC School of Public Health and others on ways to develop programs and policies that address the needs of the disadvantaged groups. TriCounty Link works with the SC Works-Charleston Employment Center and this has added an additional opportunity to access the needs of those disadvantaged populations needing transportation services for employment.

Consultation with Interested Parties

TriCounty Link will continue to provide notice of upcoming public review meetings or review periods being held on the draft and final documents. Notice will be provided to known interested parties including minorities, the disabled, elderly, low income and Limited English-speaking populations.

TriCounty Link will also continue to strive to locate more partners by focusing on the following methods of outreach:

- Email notification, to organizations such as rural migrant mission
- Use of Facebook and other social media
- Use of ads on buses with a service change
- Coordination with human service transit providers
- Engage community leaders and churches in affected geographic area to information Resources

Other resources include:

- The Mobility Management Program operated by the BCDCOG
- 211 (United Way) has transportation information & coordinate for updates
- Job placement program, administered by BCDCOG SC Works-Charleston
- Use of Environmental Justice as a scoring criterion in LRTP/TIP project selection
- Continues maintenance of GIS data on minority & low-income

Limited English Proficiency (LEP) Plan

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency* indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective

recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

LEP Plan/Policy Summary

TriCounty Link has developed a *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. These policies outline how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare the LEP policies, TriCounty Link used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the TriCounty Link
2. The frequency with which LEP persons come in contact with TriCounty Link’s services.
3. The nature and importance of services provided by TriCounty Link to the LEP population.
4. The interpretation services available to TriCounty Link and overall cost to provide LEP assistance.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require TriCounty Link’s services.

A LEP person would interact with our agency as consumer of our transportation services. TriCounty Link examined the Census Bureau’s American Community Survey, 5-Year Estimate data and was able to determine that in the tri-county area, the number of residents who spoke a language other than English at home can be broken down as follows:

**Ability to Speak English at Home
for the Population Five Years Old and Over**

	Berkeley County	Charleston County	Dorchester County
Total Population (2019)	227,907	411,406	162,809
Speaks English less than ‘very well’ (2015)	6,010	8,402	2,141
Percentage (2015)	3.30%	2.40%	1.57%

Berkeley County had approximately 6,010 persons or 3.3% of the county population who spoke English less than ‘very well.’ Charleston County had 8,402 persons or 2.4% of the county population who spoke English less than ‘very well.’ Dorchester County had 2,141 persons or 1.6% of county residents who spoke a language other than English less than ‘very well.’ In each county, Hispanics comprised the largest non-English speaking language group with 55.5% speaking Spanish. It has been found that the literacy skills in this community are adequate to provide materials, such as schedule brochures in Spanish as an effective practice and does not represent a barrier.

2. The frequency with which LEP persons come in contact with TriCounty Link services.

TriCounty Link staff reviewed the frequency with which office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, TriCounty Link has had no

requests for interpreters and no requests for translated program documents. TriCounty Link bus schedules present route information in English and Spanish. There a Spanish-speaking customer service representative to assist LEP customers, which includes purchasing of passes. The TriCounty Link website can be translated into numerous languages through the use of imbedded software.

3. The nature and importance of services provided by TriCounty Link to the LEP population.

Transportation and mobility are of great importance to the community. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. Transit providers, States, and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance. TriCounty Link's outreach activities service this role in the Latino Community.

4. The resources available to TriCounty Link and overall cost to provide LEP assistance.

TriCounty Link reviewed its available resources that could be used in providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. Resources are available, and technology solutions, coordinating with local jurisdictions, or colleges are willing to provide voluntary Spanish and other language translation or large print if needed within a reasonable time period.

Lin Analysis

TriCounty Link analyzed the four factors and determined that the population of LEP persons living in the BCD Region is relatively small when compared to the rest of the population. However, the resources have been provided and are available to provide to the LEP population. The Authority developed the following plan to assist individuals with Limited English Proficiency within its service region.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to TriCounty Link services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How TriCounty Link staff may identify an LEP person who needs language assistance:

- Post notice of LEP Policies and the availability of interpretation or translation services free of charge in languages LEP persons would understand
- All TriCounty Link staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises
- All TriCounty Link staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year
- When TriCounty Link sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each

attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish.
- When running a general public meeting notice, staff should insert the clause "Un traductor del idioma español estará disponible" This means "A Spanish translator will be available". Or if not sure of the need, staff should insert this clause, "Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la (Dianne Jensen) al teléfono (843) 899-4096, cuando menos 48 horas antes de la junta" which asks persons who need Spanish language assistance to make arrangements with TriCounty Link within two days of the publication notice.
- Include this statement when running a general public meeting notice. "Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services (free of charge) should contact (Dianne Jensen) at least two working days of the publication notice."
- TriCounty Link contracts with the Trident One Stop Employment Center and this has added an additional opportunity to access the needs of those needing transportation services for employment
- TriCounty Link will continue to participate in the Black Expo, Charleston Green Fair, North Charleston Earth Day Festival and other events to foster outreach opportunities
- TriCounty Link will continue to partner with the Mexican Consulate, the SC Department of Health and Environmental Control, the Medical University of South Carolina, the Lowcountry Aids Services, the University of SC School of Public Health and others on ways to assess and reach the needs of the disadvantaged.

Language Assistance Measures

1. TriCounty Link staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English or have disability that prevents them from fully participating in the public process
2. The following resources will be available to accommodate LEP persons:
 - Volunteer interpreters for the Spanish language and hearing impaired are available and will be provided within a reasonable time period.
 - Staff may be able to assist with written communications and all TriCounty Link documents translation requests from LEP persons. The website content may now be easily converted to Spanish and 49 other languages through the use of the Babble Fish software on the website.

Staff Training

The following training will be provided to all TriCounty Link staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for TriCounty Link will be required to follow the Title VI/LEP guidelines. In all federal procurements requiring a written contract or Purchase Order (PO), TriCounty Link's contract/PO will include appropriate non-discrimination clauses. The Title VI Coordinator

will work with the Procurement & Contracts Administrator, who is responsible for procurement contracts and Purchase Orders to ensure appropriate non-discrimination clauses are included.

Translation of Documents

TriCounty Link weighed the costs and benefits of translating documents for potential LEP groups. Considering the expense of translating all of the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is not necessary to have all documents translated. The following TriCounty Link documents are currently available in Spanish: schedule information, safety information, appeal procedures, Transportation Disadvantaged Program brochure and application, and the Title VI complaint form.

Subrecipients and LEP Policies

Awareness of LEP has grown in recent years and TriCounty Link is committed to assisting all persons achieve mobility. All fare information of subrecipients is posted on each bus and at the Transit Center in Spanish. Schedule information incorporates international symbols to improve the readability of transit information. Route signs have been installed throughout the system to aid navigation. TriCounty Link will work with subrecipients to provide information in the requested format and advise them on methods to exceed compliance with Title VI provisions.

Currently, TriCounty Link has no subrecipients. Staff monitors their compliance with Title VI through document inspections, field inspections, monitoring of service parameters, and oversight of the complaint process via annual submissions. TriCounty Link would use the compliance checklist included herein as Appendix G. No federal funds would be suballocated until all of the conditions are met.

Summary of Public Outreach and Involvement Activities

In order to integrate into community outreach activities, viewpoints of minority, low-income, and LEP populations are sought out and considered in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This is accomplished by conducting meetings in an open and welcoming manner. Meetings are held in transit accessible locations, with notices circulated in the newspaper of general circulation. Meetings are also published in minority papers per TriCounty Link's Public Participation Plan (PPP).

Multiple methods of communication are offered to our customers and citizens. Staff is accessible by telephone, e-mail, through social media, and in-person. The agency contact information is published on the website, transit vehicle interior, route schedules, and all publications. Also, public participation is encouraged through the Metropolitan Planning Organization and organization-wide events.

Dissemination of TriCounty Link's Title VI Plan

TriCounty Link's will post the Title VI Civil Rights and LEP Policy Updates on its website at www.rideTriCountyLink.com. Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, all Charleston, Berkeley and Dorchester County libraries offer free internet access. Copies of the Title Civil Rights Update will be provided to any person or agency requesting a copy. Persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the Title VI Coordinator:

Robin Mitchum, TriCounty Link, 5790 Casper Padgett Way, North Charleston, SC 29406

Phone: 843.529.0400

E-mail: robinm@bcdco.com