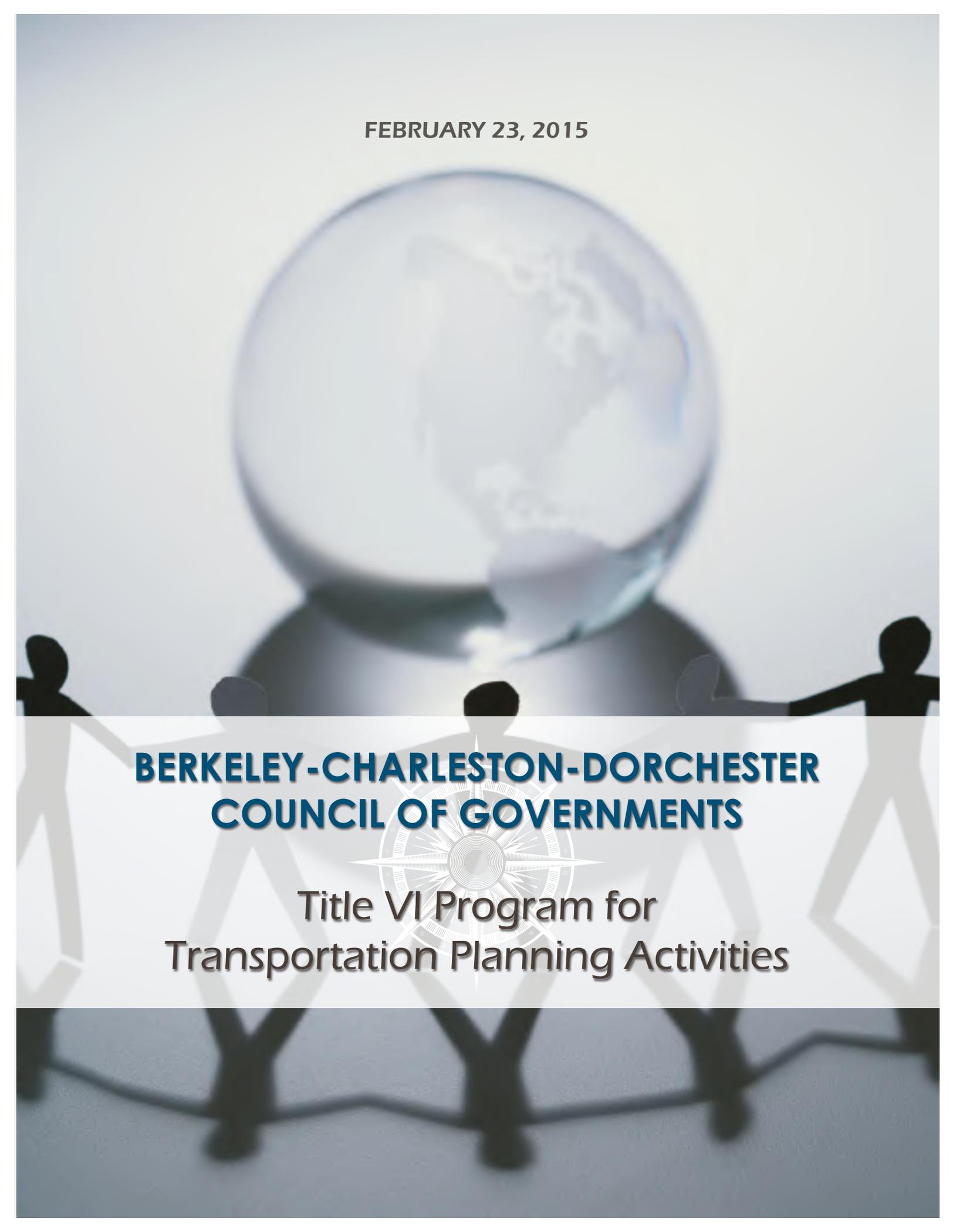


FEBRUARY 23, 2015



**BERKELEY-CHARLESTON-DORCHESTER
COUNCIL OF GOVERNMENTS**

Title VI Program for
Transportation Planning Activities

ACCESSIBLE FORMATS

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INTRODUCTION

Planning must be done with the involvement and for the benefit of all the region's residents. The Berkeley-Charleston-Dorchester Council of Governments (BCDCOG) is guided by Federal Title VI of the Civil Rights Act and environmental justice mandates, and the BCDCOG strives to not only meet these mandates, but to create an overall transparent, inclusive planning process. As the Metropolitan Planning Organization (MPO) for the three county region, the BCDCOG is committed to making Title VI of the Civil Rights Act a part of the planning process, integrating it in all programs and plans so that it may serve as a guide for public participation efforts.

TITLE VI OF THE 1964 CIVIL RIGHTS ACT

Title VI of the 1964 Civil Rights Act, as amended, protects any person in the United States on the grounds of race, color, or national origin from being excluded from participation, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Transportation.

The Age Discrimination Acts of 1975 further prohibits exclusion based on age, and Title 23 USC 324 added that no person should be excluded from participation on the basis of sex. The Civil Rights Restoration Act of 1987 reemphasized all of the anti-discrimination laws and the applicability to federal programs.

By participating in FTA programs, recipients provide the following assurance: no person, on the grounds of race, color, creed, national origin, sex, age or disability be excluded from participation in, or denied the benefits of, or be subject to discrimination under any project, program or activity funded in whole or in part by the FTA. In addition, the joint participation agreement contains the assurance that the sub-recipient shall not discriminate against any employee or applicant for employment because of race, color, religion, sex, age, or national origin.

Nondiscrimination requirements cover such areas as land acquisition and relocation of residences and businesses, impacts of construction, fixed guide-ways, placement of routes, vehicle assignments, and transit amenities available such as bus shelters, headways, passenger loads, environmental considerations, public involvement, and multilingual communication. It is critical that these elements be considered in the context of Title VI. In carrying out the provisions of the Department of Transportation (DOT) Title VI Regulations at 49 CFR Part 21, additional documents referenced in the FTA circulars that incorporate Title VI principles are listed below:

- a. DOT Order 5610.2, the Department's Order on Environmental Justice, establishes the procedures used by the Department to comply with Executive Order 12898, "Federal Actions to address Environmental Justice in Minority Populations and Low-Income Populations," dated February 11, 1994. This order establishes procedures for the Department of Transportation to use in complying with EO 12898.
- b. The Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons ("DOT LEP Guidance"), 70 FR 74087, (December 14, 2005). This guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons.
- c. Section 12 of the FTA Master Agreement, which provides, in pertinent part, that the recipient agrees to comply, and assures the compliance of each third-party contractor at any tier and each subrecipient at any tier of the project, with the provisions of 49 U.S.C. Section 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity. Furthermore, the recipient agrees to comply, and assures the compliance of each third-party contractor at any tier and each subrecipient at any tier of the project, with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sections 2000d et seq., and with 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act." Unless FTA states otherwise in writing, all recipients shall comply with all applicable Federal directives, current or future, not listed herein.



- d. FTA C 4702.1B Title VI Requirement and Guidelines for Federal Transit Administration (FTA), October 1, 2012, financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate in their programs and activities expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Person (70 FR 74087, December 14, 2005). This circular supersedes FTA Circular 4702.1A dated May 17, 2007.

BCDCOG/MPO POLICY STATEMENT

The BCDCOG, as the MPO for the tri-county region, serves as the primary forum where state departments of transportation, transit providers, local agencies, and the public work together to develop local transportation plans and programs that address the region's needs. To meet the requirements of Title VI, the BCDCOG strives to do the following:

- » Enhance its analytical capabilities to ensure that the Long-Range Plan and the Transportation Improvement Program (TIP) comply with Title VI.
- » Identify residential, medical, employment, and transportation patterns of low-income, minority and other disadvantaged populations so that their needs may be identified and addressed, and the benefits and burdens of transportation can be fairly distributed.
- » Evaluate and, where necessary, improve the public involvement process to eliminate barriers and engage minority, disabled, elderly, and low-income populations in regional decision-making.
- » Provide transit service to all citizens regardless of their race, color, creed, national origin, sex, age, or disability.
- » Not discriminate against any employee or applicant for employment because of race, color, religion, sex, or national origin, and shall take action to ensure that applicants and employees are not discriminated against during employment.
- » Make special efforts to provide transportation for persons with disabilities, and will comply with 49 CFR 27, Nondiscrimination on the Basis of Disability.
- » Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- » Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- » Promote the full and fair participation of all affected populations in transportation decision making and prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority, low-income or other disadvantaged populations;
- » Ensure meaningful access to programs/activities those with limited English proficiency.

PROGRAM ADMINISTRATION

The BCDCOG's competitive process for selecting transit providers was developed with guidance from the regional work group that met to develop the BCD Regional Human Service Transportation Coordination Plan. Subsequent to the work group's sign off on the process, the BCDCOG Board of Directors adopted the process for use in sub-allocating FTA funds. To ensure equitable distribution, service to minority and low-income populations is a selection criterion. The South Carolina Department of Transportation (SCDOT) uses this same competitive selection process to allocate funds for the rural portion of these programs.



Selection Criteria

The BCDCOG employed the following criteria in selecting transit providers to participate in FTA programs:

- » Must meet all criteria outlined in the FTA Master Agreement for FTA Sections 5310, 5307 and other FTA programs.
- » Must meet all criteria presented in the FTA Certifications and Assurances, including Title VI and DBE certifications.
- » Must propose a project that meets the objectives of the program for which funding is sought
- » The applicant must meet the selection criteria outlined in the project selection process, such as financial and organizational capacity to execute the project.
- » Applicants must complete Form 424-Application for Federal Assistance.
- » All types of agencies are eligible to apply for the programs; including private operators of public transportation services; however they cannot be a direct subrecipient.
- » The applicant's project must conform to the objectives developed in the BCD Regional Human Service Transportation Coordination Plan.

Documentation of Applicants

In an effort to document and monitor performance on the program, a record of requests for Elderly Individuals and Individuals with Disabilities, Rural and Small Urban Area Formula Funding, and other FTA funding will be maintained. The record identifies those applicants that would use grant program funds to provide assistance to predominantly minority and low-income populations. The record will also indicate whether those applicants were accepted or rejected for funding. In accordance with the appropriate guidelines, the BCDCOG submitted its annual Title VI certification and assurances in TEAM.

The BCDCOG will provide assistance, to the extent of its abilities and without incurring legal liability, to any applicant interested in applying for Elderly Individuals and Individuals with Disabilities, Rural and Small Urban Area Formula Funding and other FTA funding. BCDCOG staff will be available to meet with, visit, and/or otherwise discuss the parameters of the program. This assistance includes the process, requirements, and oversight procedures with any potential applicants. Mapping and demographic data will be made available that describes the areas of the region that are predominantly minority and low-income populations. Minority and low-income populations are defined by Census tracts that contain 50% or greater of these individuals. Applicants that provide service to employment centers that potentially employ minority or low-income individuals will be considered as serving these populations.

Monitoring Subrecipients

The BCDCOG will document its process for ensuring that all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B. Subrecipients will be required to sign an affirmation of compliance with the Title VI requirement in the application package for FTA funding. Upon award of funding, subrecipients will be required to sign and operate within the FTA certifications and assurances. Performance monitoring will occur via oversight reviews and quarterly reporting from subrecipients.

At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by the SCDOT, the BCDCOG shall request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis. Subrecipients will be asked to develop system-wide service standards and verify that services provided to predominantly minority and low-income communities meet these standards.

Assistance Provided to Subrecipients

Below is a sample notice to the public informing beneficiaries of their rights under Title VI and procedures on how to file a Title VI complaint. This information will be provided to subrecipients.



Public Information Concerning Title VI of the Civil Rights Act of 1964, as amended

The transportation provider is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with transportation provider, mailing address, or call the transit information center at phone number, Toll Free phone number, TTY number, or by e-mail on this website under "Contact Us."

Complaint Response Procedure

The following is the procedure employed by the BCDCOG in tracking and investigating Title VI complaints. The procedure will be offered to subrecipients as a sample process.

1. Any written or oral complaint alleging discrimination on the grounds covered by Title VI of the Civil Rights Act of 1964, as amended, should be recorded upon receipt on a log sheet maintained by the BCDCOG. The log should include the following:
 - » Name of complainant(s)
 - » Date complaint was received
 - » Nature of complaint
 - » Action taken by agency
 - » Initial/signature of the agency representative handling the complaint
2. Once the complaint is recorded on the log sheet, it should be immediately forwarded with a cover letter to the SCDOT, Title VI Coordinator, P.O. Box 191, Columbia, SC 29201-0191 as well provide a copy of the cover letter to the complainant to advise them that the complaint was forwarded to SCDOT for investigation. BCDCOG staff will provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. In instances where additional information is needed for assessment or investigation of the complaint, the complainant will be contacted in writing within 15 working days. All Title VI complaints must be filed no later than 180 days after the alleged discrimination. The Finance Manager, Ms. Robin Mitchum, has been designated the Title VI Liaison. In that capacity, the Finance Manager is responsible for managing the complaint process from initial contact to resolution of the issue. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by BCDCOG in its financial assistance agreements with USDOT.

The Financial Manager can be contacted at the following address:

Ms. Robin Mitchum, BCDCOG Financial Manager

1362 McMillan Ave., Suite 100

North Charleston, SC 29405

Phone: 843.529.0400 Fax: 843.529.0305

E-mail: mitchumr@bcdcog.com www.bcdcog.com

3. SCDOT will process the complaint in accordance with the approved Title VI Complaint Processing Procedures. In addition to the complaint process stated above, a complainant may file a Title VI complaint with the U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, Region IV, 230 Peachtree, NW, Suite 800, Atlanta, GA 30303.
4. The BCDCOG has received no Title VI complaints.



REGIONAL DEMOGRAPHIC DATA

Demographic information, including average household income, concentrations of special groups, elderly persons, and low-income populations will be employed to describe transit service area and the level of service provided to these groups. Information gathered will provide objective data as to the service being delivered. The data noted below will be collected and analyzed annually, as available, to confirm the **BCD Regional Census Data- Low to Moderate Income (LMI) (HUD 2014 data release based on American Community Survey summary files 2006 - 2010)**:

Berkeley County data shows that 37.4% of the population was identified as LMI population with a small concentration in the urban area of the Town of Moncks Corner and City of Hanahan area and a greater concentration in the rural transportation areas outside of the MPO area. Map is attached in Appendix A.

Charleston County had 40.4% of the population listed as LMI with notable heavy concentrations in the urban areas located in the City of North Charleston and pockets of LMI residents on the City of Charleston peninsula. Map is attached in Appendix A.

Dorchester County data showed 33.1% of the population was listed as LMI with concentrations in the urban transportation area near the Town of Summerville and also in the part of the City of North Charleston located in Dorchester County. Map is attached in Appendix A.

Regional Census Data - Minority (race data from American Community Survey summary files 2009 – 2013: minority equals all persons reporting one race other than Non-Hispanic White):

Berkeley County listed 36.1% as minority while Charleston County counted 37.5% and Dorchester County noted that 34.6% of the county population was minority. Concentrations of minority populations in the urban transportation area were located in the City of North Charleston, the City of Charleston peninsula and parts of the West Ashley located in the City of Charleston and Johns Island. Map is attached in Appendix A.

Regional Census Data - Ethnicity: (ethnicity data from American Community Survey summary files 2009 – 2013: populations of Hispanic origin):

Berkeley County noted that 6.1% was of Hispanic origin, Charleston County counted 5.2%; Dorchester County had 4.6% of the population. Heavy concentrations were noted in the Charleston and Berkeley County corridor from the City of North Charleston to City of Hanahan and the City of Goose Creek. Map is attached in Appendix A.

Requirement to Prepare and Submit a Title VI Program

The document that was prepared and submitted herein ensures compliance with 49 CFR Section 21.9(b). This program will be submitted once every three years.

The BCDCOG uses the project selection process to monitor that FTA financial assistance is passed-through in a non-discriminatory manner. Demographic data analyses, project oversight, oversight reviews, and quarterly reporting from subrecipients will be used to monitor subrecipients. Quarterly reports from each subrecipient will be summarized and reviewed to track compliance.

In compliance with 49 CFR Section 21.9(b), BCDCOG will record and retain information and submit information to FTA as necessary or required. A compliance report shall be submitted to the responsible FTA regional office every four years. Elements in Chapters IV, V, VI, and VII and appendices of the FTA Circular 4702.1B are to be included in these reports. Subrecipients shall submit compliance reports to the recipient consistent with reporting timelines established by the BCDCOG.



PUBLIC PARTICIPATION

Introduction

In accordance with federal guidelines, the BCDCOG developed a Public Participation Plan (PPP) that strives to involve all stakeholders in the planning process while recognizing that minorities, low income and other populations need additional outreach. This approved plan documents the actions to be carried out by the Berkeley-Charleston-Dorchester Council of Governments (BCDCOG) to ensure that opportunities exist for the public to be involved in transportation planning activities, pursuant to Title 23 CFR 450.316 of Statewide Planning; Metropolitan Planning and 40 CFR 51.402(e) Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects... and section VI-A 2CCR604-2 Statewide Transportation Planning rules. The public participation process 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 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: to confirm the purpose and intent of the plan or project; to present the trends and forecasts for the region; and to gather public input. Actions of meetings may result in the adoption or approval/disapproval of the Unified Planning Work Program (UPWP), Transportation Improvement Program (TIP), Annual Listing of Obligated Projects, Long Range Transportation Plan (LRTP), and/or 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 (For a helpful Transportation Planning Glossary, see Appendix C). Efforts will be made to tailor advertising, project campaigns and slogans to generate the most interest possible. The BCDCOG/MPO will make reasonable efforts to address identified language barriers in order to provide meaningful access to information on its plans and programs.

Accessibility

BCDCOG 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 transportation.

Public Notification Procedures

Meetings notices shall be advertised in the Charleston Post & Courier Newspaper and documents shall be made available in draft form for public review and comment (in the offices of the BCDCOG, City and County Planning Departments in the region), at least fifteen (15) days prior to a Policy Committee Meeting where action is scheduled. Notices will also be sent to media outlets that focus on minority population in the community. These outlets include the following:

- » WAZS 98.9 El Sol
- » Jabr Communications
- » Charleston Chronicle Newspaper
- » WJEA Channel 12



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. The BCDCOG's outreach efforts in these areas will continue to provide these residents with an opportunity to voice their opinions and concerns. The BCDCOG/MPO 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

The BCDOG'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 the BCDCOG staff and made available on request.

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:

BCDCOG produces and distributes a periodic newsletter that includes articles and other information of interest on BCDCOG plans, programs, and studies.

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 BCDCOG/MPO activities. The BCDCOG/MPO's website, (<http://www.bcdco.com/transportationPlanning.htm>) will be employed as a tool for disseminating information on meetings, project updates and background. The website is a tool to describe and visually represent transportation plans, programs, meetings, and other appropriate information. A calendar is included on the BCDCOG website displaying scheduled committee meetings. Staff shall post draft documents on the website for public review and comment.



The website shall contain, but is not limited to:

- » Brief descriptions of current projects with available maps, photos, renderings
- » Work products and publications – TIP, UPWP, LRTP, etc.
- » Links to related agencies and planning partners – SCDOT, FHWA, etc.
- » Current Operating Procedures – including Public Participation Plan
- » A listing of current member jurisdictions
- » Meeting calendars with agendas as soon as feasible
- » Contact information – mailing address, phone, fax and e-mail
- » Profiles of 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 post cards will be sent to individuals and groups notifying them of meetings, in addition to the notices that are distributed to the local media.

Information Gathering Techniques

Outreach Tools serve to initiate a two-way dialogue and therefore also act as Information Gathering Tools.

By providing the opportunity for everyone to participate in the transportation planning process, the BCDCOG insures 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, BCDCOG staff uses Census data to determine where concentrations of the underserved or underrepresented reside. Using this data, staff does the following:

Internet	As internet usage and availability continues to increase so will the BCDCOG’s’s utilization of this technology to gather input. Online surveys are obvious tools to gather public sentiment along with website “hit” counts to analyze which plans or projects are garnering interest.
Surveys	Common input gathering tools include statistically valid telephone surveys, user surveys, traditional postage -paid comment cards, and online surveys.
Comment Card	Comment cards will be available at every public meeting. At specially held public meetings, all participants will be encouraged to fill out a comment card. In addition to gaining feedback, the BCDCOG can also bolster its interested party’s database if the participant wishes.
Advisory Committees	The Title VI Working Group advises staff and reviews plans in regards to Environmental Justice.
Door-to-Door Campaigns	When warranted, highly localized projects may benefit from door-to-door (business and/or residential) campaigns to distribute information, project updates, and gather input and comments.



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 notifying the BCDCOG 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.

Public Outreach Opportunities:

As part of the public outreach to minority and low income populations, the BCDCOG has participated in the regional Black Expo held in the City of North Charleston, the Charleston Green Fair, and the North Charleston Earth Day Festival and other opportunities as they arise.

The BCDCOG also continues to partner with the SC Department of Health and Environmental Control, the Medical University of South Carolina, the University Of S.C School of Public Health and others on ways to develop programs and policies that address the needs of the disadvantaged groups. The BCDCOG also includes the SC Works Employment Center to its agency and adds an additional opportunity to access the needs of those disadvantaged populations needing transportation services for employment.

Consultation with Interested Parties

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

The BCDCOG 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, Twitter 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
- » Mobility management one-on-one phone line
- » 211 (United Way) has transportation information & coordinate for updates
- » Low-income bus pass program, operated by BCDCOG TOSSC
- » Use of Environmental Justice as a scoring criterion in LRTP/TIP project selection
- » Continuation of maintenance of GIS data on minority & low-income populations



LIMITED ENGLISH PROFICIENCY PLAN (LEP)

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

The BCDCOG 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, the BCDCOG used the four-factor LEP analysis which considers the following factors:

- » The number or proportion of LEP persons in the service area who may be served by the BCDCOG.
- » The frequency with which LEP persons come in contact with BCDCOG services.
- » The nature and importance of services provided by the BCDCOG to the LEP population.
- » The interpretation services available to the BCDCOG 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 BCDCOG services according to 2010 Census data:**

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER			
Universe: Population 5 years and over			
	Berkeley	Charleston	Dorchester
Total Population:	171,069	335,746	130,133
Speak English less than “very well”	5,533	9,723	2,976
Percentage	3.2%	2.9%	2.3%

2. **The frequency with which LEP persons come in contact with BCDCOG services.** The BCDCOG staff reviewed the frequency with which the Executive Board and office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the BCDCOG has had no requests for interpreters and no requests for translated program documents. The Executive Board office staff have had limited contact with LEP persons.
3. **The nature and importance of services provided by the BCDCOG to the LEP population.** As part of the public outreach to LEP populations, the BCDCOG participates in the regional Black Expo held in the City of North Charleston, the Charleston Green Fair, the North Charleston Earth Day Festival, and other opportunities as they arise. The BCDCOG 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; the



partners have identified transportation as a as a major concern for their clients stating many do not drive and rely on public transit, walking, or biking to get primarily to work, medical or grocery shopping. The BCDCOG/MPO has recently added the SC Works Employment Center to its agency and this has added an additional opportunity to access the needs of those needing transportation services for employment.

4. **The resources available to the BCDCOG and overall costs to provide LEP assistance.** The BCDCOG reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local jurisdictions and colleges that would be willing to provide voluntary Spanish and other language translation or large print if needed within a reasonable time period.

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 BCDCOG 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 the BCDCOG 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 BCDCOG staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- » All BCDCOG staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- » When the BCDCOG 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 (insert staff name) al teléfono (727) 464-8200, cuando menos 48 horas antes de la junta” which asks persons who need Spanish language assistance to make arrangements with the BCDCOG 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 (insert staff name) at least two working days of the publication notice.”
- » The BCDCOG/MPO has recently added the SC Works Employment Center to its agency to access the needs of those needing transportation services for employment.
- » The BCDCOG will continue to participate in the Black Expo, Charleston Green Fair, North Charleston Earth Day Festival and other events to foster outreach opportunities.



- » The BCDCOG will continue to partner with the, the SC Department of Health and Environmental Control, the Medical University of South Carolina and others on ways to assess and reach the needs of the disadvantaged.

Language Assistance Measures

1. The BCDCOG 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 small BCDCOG document translation requests from LEP persons. The BDCOG 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 BCDCOG staff:

Information on the Title VI Policy and LEP responsibilities.

- »
- » Description of language assistance services offered to the public.
- » Documentation of language assistance requests.
- » How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the BCDCOG will be required to follow the Title VI/LEP guidelines.

Translation of Documents

The BCDCOG 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 BCDCOG documents are currently available in Spanish: bicycle safety poster, pedestrian crosswalk safety flyer, pedestrian sidewalk safety flyer, bicycle safety flyer, 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 BCDCOG 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. BCDCOG will work with subrecipients to provide information in the requested format.

Board and Committee Memberships

The BCDCOG values diversity and actively seeks representation on boards, regardless of cultural identity, background or income level.

On April 12, 2010, the BCDCOG amended the By Laws to enhance diversity on the board as follows:

In accordance with the membership provisions set forth in Article II of the Agreement, the terms of membership of elected officials shall be coterminous with the term of elected office...The membership provisions set forth in Article II



of the Agreement have been revised to include two additional minority representatives from each of the three county councils (Berkeley, Charleston, and Dorchester). The new representatives do not have to be elected representatives, they could be citizens but they must be minorities.

A complete list of BCDCOG/MPO committee membership by race is attached in Appendix C.

Monitoring of Transit Service

In order to comply with 49 CFR Section 21.5(2), 49 CFR Section 21.5(b) (7) and Appendix C to 49 CFR part 21, monitoring of transit service provided throughout the service area will occur. Annual service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. If the monitoring determines that prior decisions have resulted in disparate impacts, corrective action to remedy the disparities will be taken. To fulfill this requirement, BCDCOG will implement the following procedure:

1. Environmental Justice

Environmental justice is a program to ensure that one group is not unjustly subjected to burden the negative impacts of a construction project or general impact of an organizational decision. BCDCOG will include environmental justice considerations in capital investment projects and transit service delivery.

2. 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 the BCDCOG Public Participation Plan (PPP) updated in 2012.

Multiple methods of communication are offered to our customers and citizens. Staff is accessible by telephone, e-mail, 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 BCDCOG events.

CHATS Metropolitan Planning Organization Documents

CHATS produces three major planning documents: the Unified Planning Work Program (UPWP), Transportation Improvement Program (TIP), and the Long Range Transportation Plan (LRTP). Protections provided under Title VI are incorporated into each of these documents. The projects selected for execution considered the needs as well as the impacts on those traditionally underserved by the transportation systems, such as low income and minority populations who may face challenges accessing employment, medical and other services. The TIP and LRTP project selection criteria include environmental justice as a criterion. All of these efforts and procedures are detailed in the CHATS PPP. The BCDCOG region's TIP is provided to SCDOT to be included in the statewide transportation Improvement program (STIP).

Monitoring and Updating the Title VI and LEP Policies

The Title VI Plan is designed to be flexible and is one that can be easily updated. At a minimum, the BCDCOG will follow the Title VI Program update schedule for the LEP Plan. The next required Title VI Program update must be forwarded to the FTA by April 27, 2014.



Dissemination of the BCDCOG's Title VI Plan

The BCDCOG will post the Title VI Civil Rights and LEP Policy Updates on its website at bcdcog.com. Any persons, 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. Each LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the BCDCOG Title VI Specialist:

Ronald E. Mitchum, Executive Director,

BCDCOG

1362 McMillan Ave., Suite 100

North Charleston, SC 29405

Phone: 843.529.0400

Fax: 843.529.0305

E-mail: ronm@bcdcog.com

CONCLUSION

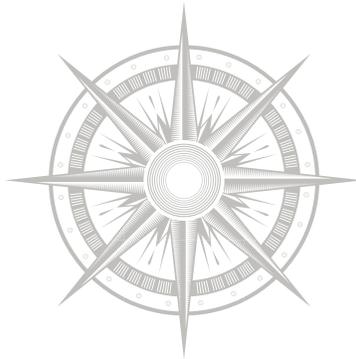
The Civil Rights Act was established in the spirit of fair and equitable treatment of all persons. The preceding policies and performance measures seek to objectively indicate that BCDCOG has complied with the intent of the legislation. The data presented in the tables, text, and maps offer evidence that these requirements have been met. Transit service is a benefit for all citizens of this community and legislations, such as Title VI ensures that it is allocated equitably.

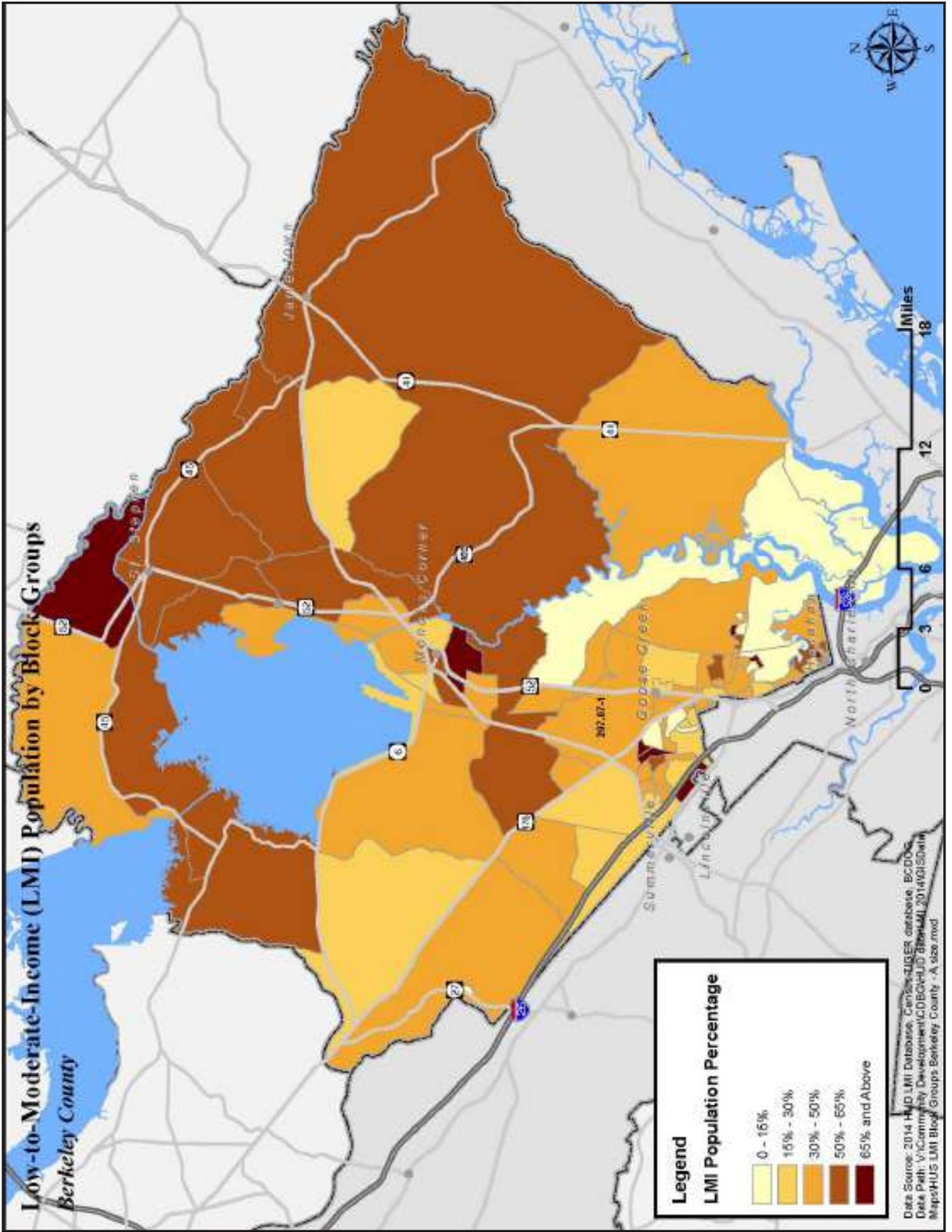




APPENDIX A:

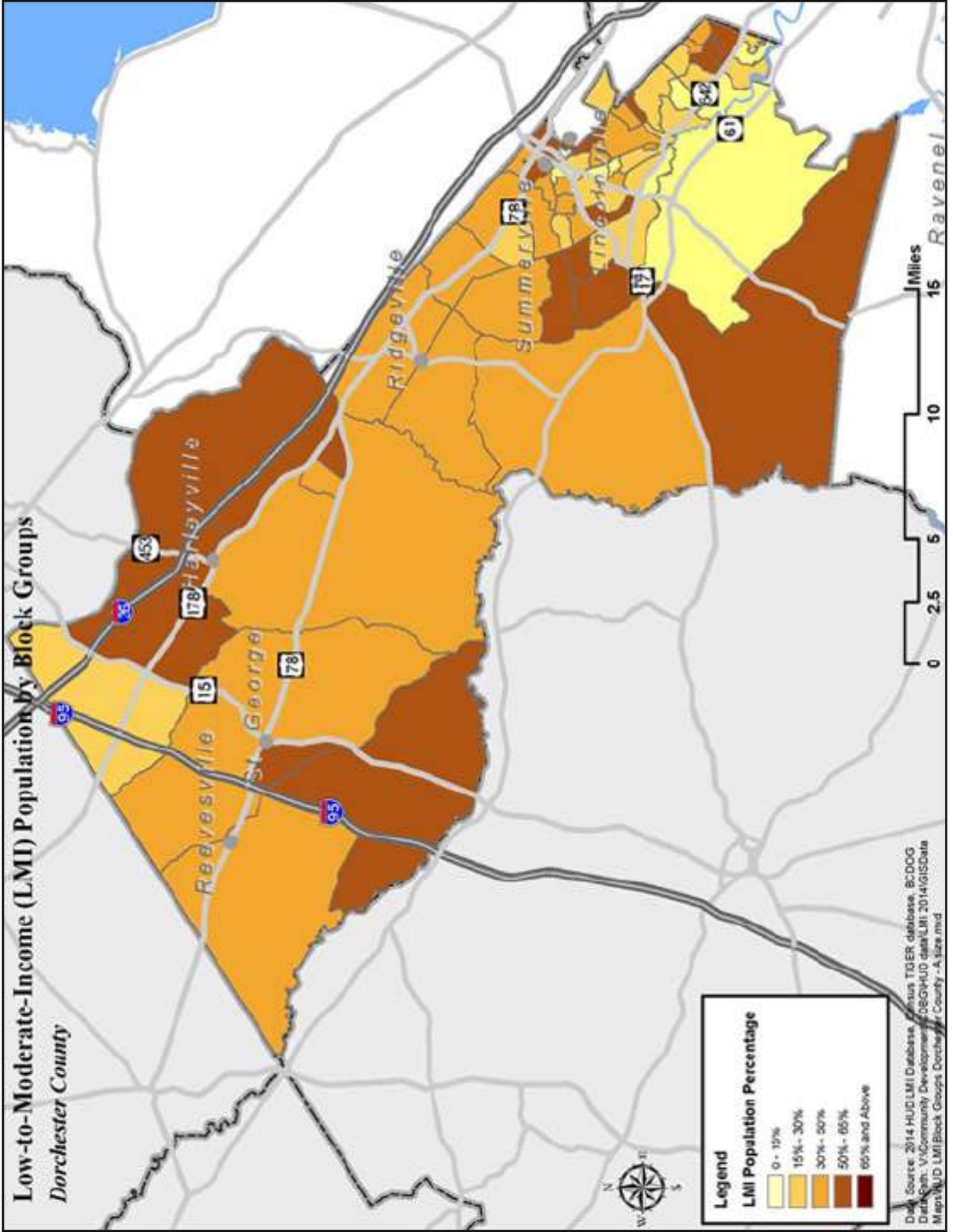
MAPS





Low-to-Moderate-Income (LMI) Population by Block Groups

Dorchester County



Legend

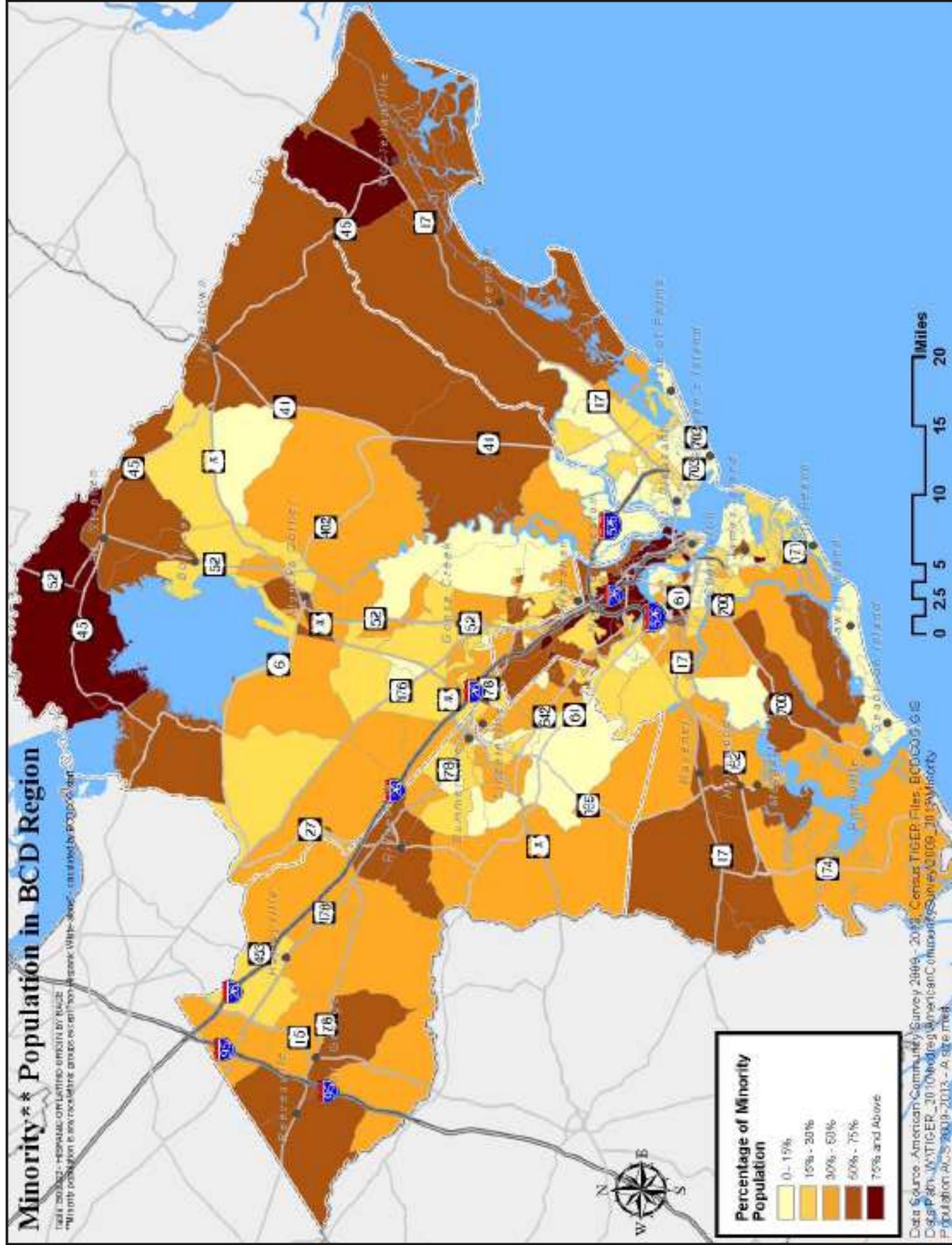
LMI Population Percentage

- 0 - 15%
- 15% - 30%
- 30% - 50%
- 50% - 65%
- 65% and Above

Data Source: 2014 HUD LMI Database, Census TIGER database, BCOOG
Data Path: V:\Community Development\06-GH-HUD data\LMI 2014\GISData
Map: HUD LMI Block Groups Dorchester County - A_size.mxd

Minority** Population in BCD Region

TABLE 2003-02 - HISPANIC OR LATINO ORIGIN BY RACE
 **This table population is not race/ethnic group as defined by the Census Bureau.



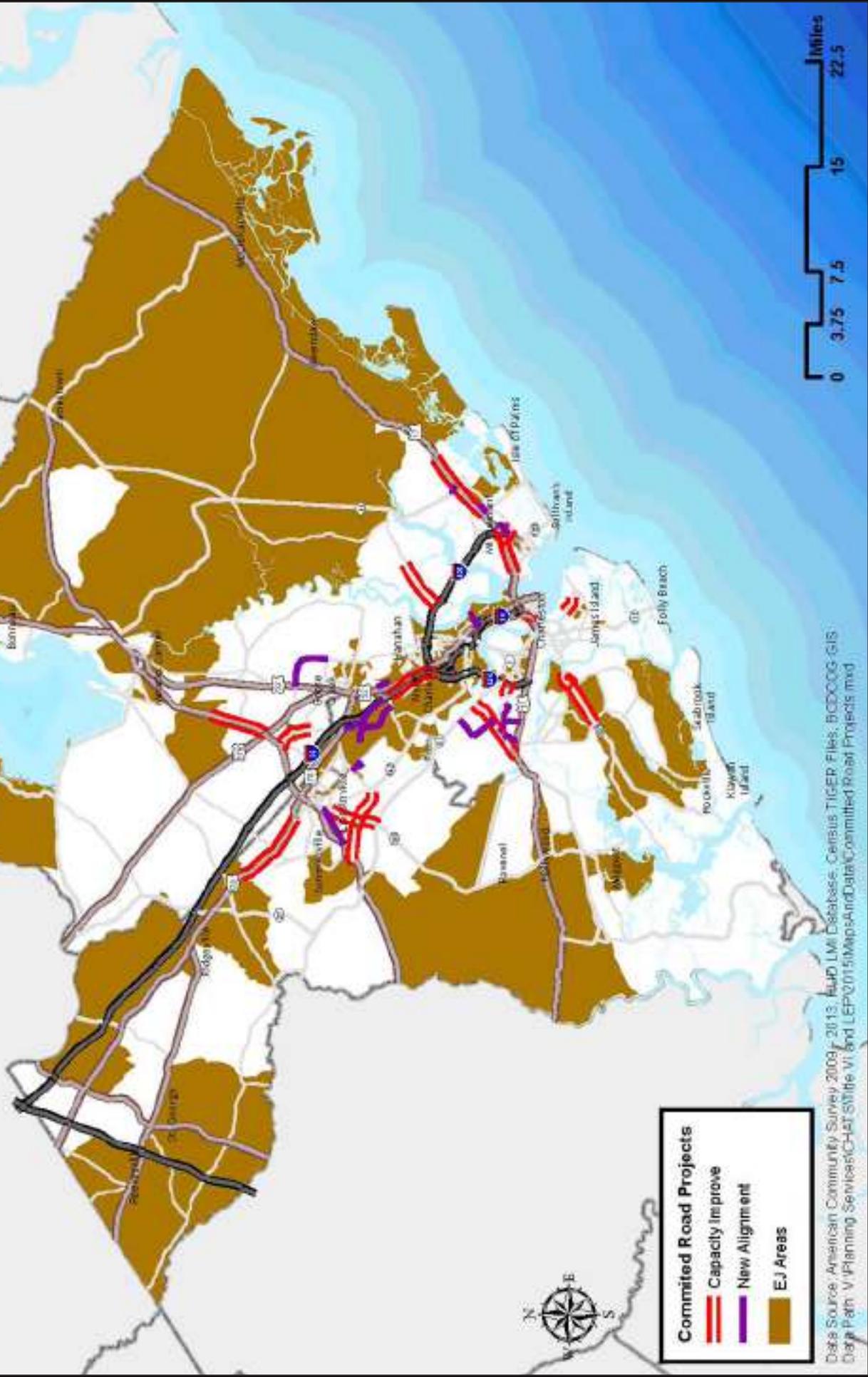
Percentage of Minority Population

Light Yellow	0% - 15%
Yellow	15% - 30%
Orange	30% - 50%
Dark Orange	50% - 75%
Dark Red	75% and Above

Data Source: American Community Survey 2009 - 2013, Census TIGER Files, BCD 2009-16
 Data Path: W:\TIGER_2010\redreg\americanCommunitySurvey\2009_2013\Minority
 Population ACS 2009-2013 - A size med.

Environmental Justice Population** And Transportation Improvement Projects

** Census Block Groups with more than 50% of population in either of the categories "Minority" or "LMI"

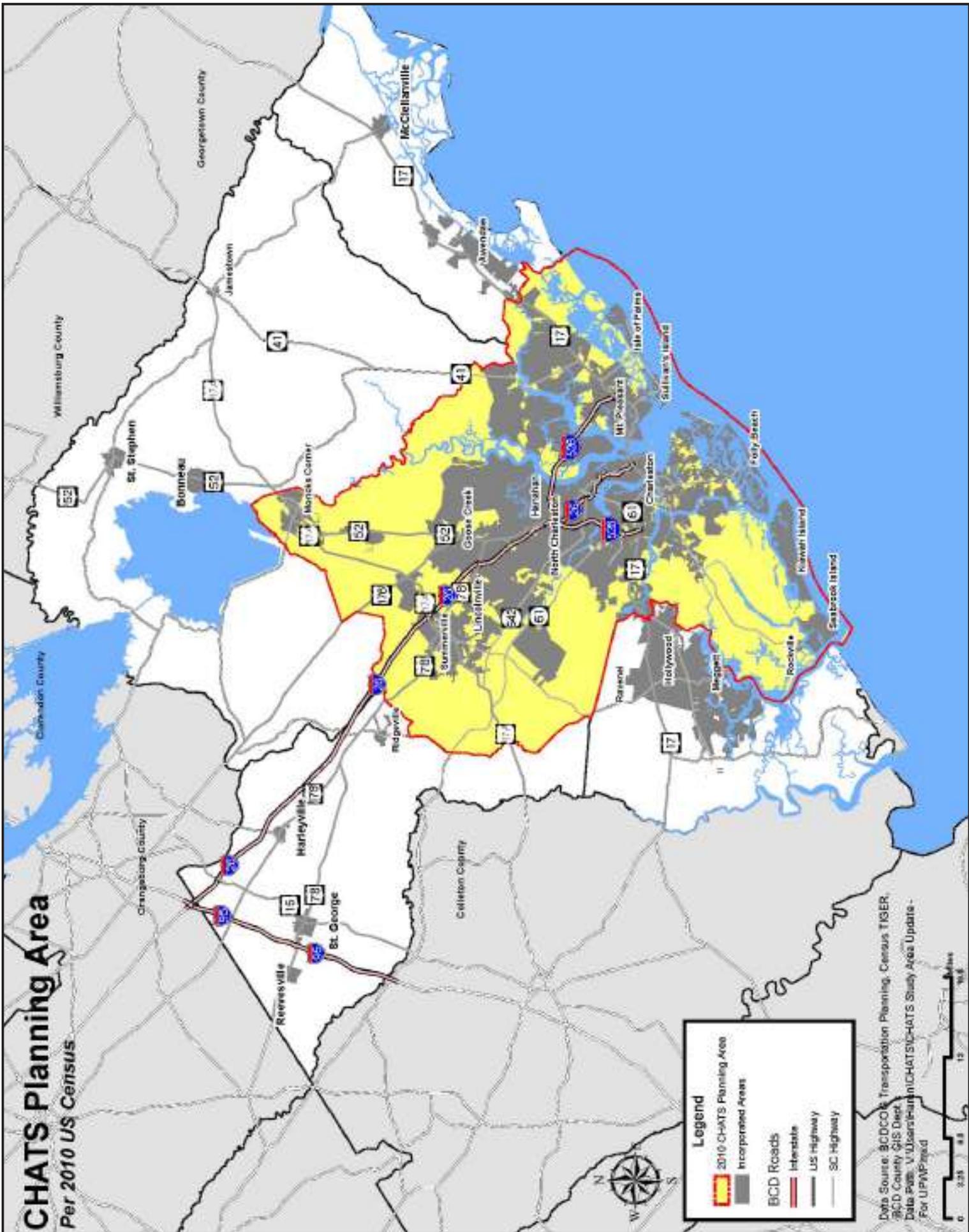


Committed Road Projects	
	Capacity Improve
	New Alignment
	EJ Areas

Data Source: American Community Survey 2009, 2013, HUD LMI Database, Census TIGER Files, BDCOG GIS Data Path: V:\Planning Services\CHART\Title VI and LEPA\2015\MapAndData\Committed Road Projects.mxd

CHATS Planning Area

Per 2010 US Census



Legend

- 2010 CHATS Planning Area
- Incorporated Areas
- BCD Roads**
- Interstate
- US Highway
- SC Highway

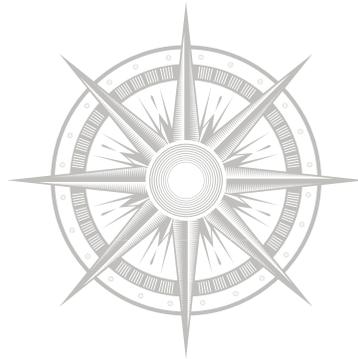
Data Source: BCDCO's Transportation Planning, Census TIGER, BCD County GIS Dept.
 Data Date: V:\Users\hurd\1\CHATS\CHATS Study Area Update - For UPP\Prep





APPENDIX B:

FORMS



List of Title VI Investigations, Complaints, and Lawsuits

The BCDCOG maintains a file for Title VI complaints, investigations and lawsuits. To date, there have been no Title VI complaints, investigations, or lawsuits filed against the BCDCOG.

	Date (Month, Day, Year)	Summary (Include the basis of complaint: Race, Color or National Origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				



TITLE VI COMPLAINT FORM

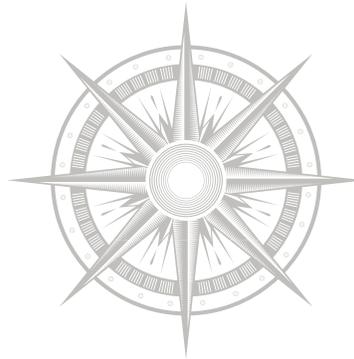
Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print :		Audio Tape:
	TDD:		Other:
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
<i>*If you answered "yes" to this question, go to Section III</i>			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
<p>I believe the discrimination I experienced was based on (check all that apply):</p> <p><input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin</p> <p>Date of Alleged Discrimination (Month/Day/Year): _____</p> <p>Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information.</p>			
_____		_____	
NAME		SIGNATURE	





APPENDIX C :

MEMBERSHIP OF BCDCOG AND CHATS BOARDS AND
COMMITTEES BY RACE AND GENDER



BCDCOG BOARD OF DIRECTORS

	NAME	GENDER	RACE
Berkeley County	William Peagler	M	W
	Timothy Callahan	M	W
	Steve Davis	M	W
	Caldwell Pinckney	M	B
Berkeley County Legislative Delegation	Joseph Jefferson	M	B
	Elaine Morgan	F	W
Charleston County Council	Victor Rawl	M	W
	Elliott Summey	M	W
	Teddie Pryor	M	B
	Robert Reid	M	B
	Melvin Williams	M	B
	David Haselden	M	W
	Guy Taylor	M	W
Charleston County Legislative Delegation	Chris Murphy	M	W
	Peter McCoy	M	W
	Bill Crosby	M	W
	Phillip Siegreest	M	W
	Tim Mallard	M	W
Dorchester County Council	Carroll Duncan	F	W
	Jay Byars	M	W
	Ralph James	M	B
	Mathew Profit	M	B
Dorchester County Legislative Delegation	Jenny Horne	F	W
	Gary Brewer	M	W
City of Charleston	Joseph Riley	M	W
	Keith Waring	M	B
	Robert Mitchell	M	B



City of North Charleston	Keith Summey	M	W
	Bobby Jameson	M	B
City of Hanahan	Minnie Blackwell	F	W
Town of Mt. Pleasant	Linda Page	F	W
Town of Summerville	Bill Collins	M	W
City of Goose Creek	Michael Heitzler	M	W
City of Isle of Palms	Dick Cronin	M	W
Town of Moncks Corner	Michael Locklear	M	W
Town of St. George	Anne Johnston	F	W
Town of St. Stephen	Jerry Thrower	M	W
Town of Sullivan's Island	Pat O'Neil	M	W
City of Folly Beach	Timothy Goodwin	M	W
Town of Ravenel	Opal Baldwin	F	W
Town of Hollywood	Jacquelyn Heyward	F	B
Town of Meggett	Tom Hutto	M	W
Town of Lincolville	Charles Duberry	M	B
Town of Awendaw	Sheila Powell	F	B
Town of McClellanville	Robert Gannon	M	W
Town of Bonneau	Allen June	M	W
Town of Jamestown	Roy Pipkin	M	W
Town of Kiawah Island	Charles Lipuma	M	W
Town of Seabrook	Terrence Ahearn	M	W
Town of Reevesville	Paul Wimberly	M	W
Town of Harleyville	Charles Ackerman	M	W
Town of Ridgeville	James Williams	M	B
Town of James Island	Bill Woolsey	M	W
James Island Public Service District	Carter McMillan	M	W
North Charleston Sewer District	Gary McJunkin	M	W
St. Andrews Public Service District	John DeStefano	M	W
1st District Highway Commissioner	Jim Rozier	M	W



CHATS POLICY COMMITTEE MEMBERSHIP

	NAME	GENDER	RACE
Berkeley County Council	William Peagler	M	W
	Timothy Callanan	M	W
Berkeley County Legislation	Larry Grooms	M	W
	Bill Crosby	M	W
Berkeley-Charleston-Dorchester Council of Governments	Teddie Pryor	M	B
Charleston County Council	Elliott Summey	M	B
	Victor Rawl	M	W
	Herbert Sass	M	W
Charleston County Legislative Delegation	Chip Limehouse	M	W
	Leon Stavrinakis	M	W
	Robert Harrell	M	W
	Chip Campsen	M	W
Dorchester County Council	William Hearn	M	W
	George Bailey	M	W
Dorchester County Legislative Delegation	Chris Murphy	M	W
SC State Ports Authority	James Newsome	M	W
Charleston County Aviation Authority	Paul Campbell	M	W
CARTA	Elliott Summey	M	W
US Air Force/Naval Weapon Station	Lt. Col. Patrick G. Miller	M	W
SC Trucking Association	Matt Thompson	M	W
Rail Companies	Frank Macchiaverna	M	W
Berkeley Co. Transportation Committee	Vacant		
Charleston Co. Transportation Committee	Jim Armstrong	M	W
Dorchester Co. Transportation Committee	Vacant		
First Congressional District	Mark Sanford	M	W
Sixth Congressional District	James Clyburn	M	B
SC Department of Transportation	Jim Rozier	M	W
	Samuel Glover	M	W



City of Charleston	Joseph Riley	M	W
	Dean Riegel	M	W
	Aubrey Alexander	M	W
City of North Charleston	Keith Summey	M	W
	Edward Astle	M	W
	Robert King	M	W
Town of Mt. Pleasant	Linda Page	F	W
	Chris Nickels	M	W
	Paul Gawrych	M	W
Isle of Palms	Richard Cronin	M	W
Town of Sullivan's Island	Pat O'Neil	M	W
City of Folly Beach	Timothy Goodwin	M	W
City of Goose Creek	Michael Heitzler	M	W
Town of Seabrook Island	Terry Ahearn	M	W
Town of James Island	Bill Woolsey	M	W
Town of Lincolville	Charles Duberry	M	B
City of Hanahan	Minnie Blackwell Newman	F	W
Town of Kiawah Island	Charles Lipuma	M	W
Town of Summerville	Bill Collins	M	W
Town of Moncks Corner	Vacant		

CHATS STUDY TEAM

	NAME	GENDER	RACE
BCDCOG	Ron Mitchum	M	W
Berkeley County	Eric Greenway	M	W
Town of James Island	Ashley Kellahan	F	W
Dorchester County	Alec Brebner	M	W
FHWA	Jessica Hekter	F	W
Charleston County	Dan Pennick	M	W
Greater Summerville/Dorchester Chamber	Rita Berry	F	W
Dorchester County	Wendy Smith	F	W
Bulldog Express	R.D. Moseley	M	W



Dorchester County	Randall Charpia	M	W
Berkeley County	Barry Jurs	M	W
SC Ports Authority	Peter Lehman	M	W
Charleston County School District	Curtis Norman	M	W
DHEC/OCRM	Curtis Joyner	M	W
Charleston County Aviation Authority	Paul Campbell	M	W
SCCCL	Myles Maland	M	W
Charleston Water System	Andy Fairey	M	W
Citizen	Paul Roberts	M	W
City of Charleston	Hernan Pena	M	B
City of North Charleston	Wannetta Mallette	F	B
Town of Mt. Pleasant	Brad Morrison	M	W
City of Goose Creek	Sarah Hansen	F	W
Town of Moncks Corner	Roland Windham	M	W
Charleston County	Steve Dykes	M	W
Charleston County	Jim Armstrong	M	W
Joint Base Charleston	Bill Werrell	M	W
Town of Summerville	Madelyn Robinson	F	W
Berkeley County	Thomas Lewis	M	W
City of Hanahan	John Cribb	M	W
Dorchester 2 School District	Dennis Boozer	M	W
Berkeley County School District	Wes Fleming	M	W
SCANA	Tammy Coghill	F	W





Berkeley-Charleston-Dorchester Council of Governments

CHAIRMAN:
Teddie Pryor

VICE CHAIRMAN:
William Collins

SECRETARY:
Caldwell Plackney

TREASURER:
Linda Page

EXECUTIVE DIRECTOR:
Ronald E. Mitchum

February 23, 2015

Mr. Carlos A. Gonzales
Federal Transit Administration District IV
230 Peachtree Street, N.W.
Atlanta, GA 30303

RE: CONFIRMATION OF BOARD APPROVAL OF TITLE VI PROGRAM

Dear Mr. Gonzales:

This letter is to confirm that the Berkeley-Charleston-Dorchester Council of Governments Board of Directors approved the Berkeley-Charleston-Dorchester Council of Government's Title VI Program on February 23, 2015. The Title VI Program is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code and the Federal Transit Administration's Circular 4702.1 B, "Title VI Program Guideline for Federal Transit Administration Recipients" effective October 1, 2012.

Thank you for your ongoing cooperation in meeting all of the FTA Civil Right Program requirements.

Sincerely,

Ronald E. Mitchum
Executive Director

RESOLUTION

WHEREAS, the Berkeley Charleston Dorchester Council of Governments (BCDCOG) is a public body authorized by the General Assembly of the State of South Carolina to serve as the regional planning organization for the counties of Berkeley, Charleston and Dorchester as well as the municipal governments contained within those counties; and

WHEREAS, in accordance with Title VI of the Civil Rights Act of 1964 and associated non-discrimination laws in regard to access to services and activities by federal agencies and recipients of federal assistance, the Berkeley Charleston Dorchester Council of Governments Title VI Plan was drafted to reaffirm the BCDCOG's policy to allow all individuals the opportunity to participate in federal financially assisted services; and

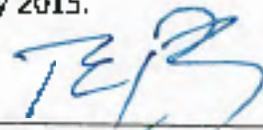
WHEREAS, in accordance with Title VI non-discrimination laws in regard to providing appropriate access and activities provided by federal agencies and recipients of federal assistance, the Limited English Proficiency Plan was drafted to define how the BCDCOG will accommodate person with Limited English Proficiency; and

WHEREAS, individuals who do not speak English well and who also have a limited ability to read, write, speak, or understand English are entitled to Language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service or encounter; and

NOW THEREFORE BE IT RESOLVED that the BCDCOG Board of Directors approve and adopt the Title VI Plan; and

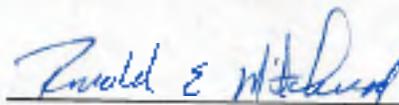
BE IT FINALLY RESOLVED that the BCDCOG Board of Directors approve and adopt the Limited English Proficiency Plan.

READ AND ADOPTED the 23rd day of February 2015.



Teddie E. Pryor, Sr., Chairman

Certified true and correct copy of a resolution adopted by the Berkeley-Charleston-Dorchester Council of Governments on February 23, 2015.



Ronald E. Mitchum
Executive Director

February 23, 2015



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV

230 Peachtree Street, NW
Suite 1400
Atlanta, GA 30303

February 27, 2015

Vonie Gilreath, MCRP, M.Ed.
Mobility Manager
Berkeley-Charleston-Dorchester Council of Governments (BCDCOG)
1362 McMillan Avenue Suite 100
North Charleston, SC 29405

Re: Title VI Program Concurrence: BCDCOG – Recipient ID: 1068

Dear Ms. Gilreath:

This letter is to confirm that we received the Berkeley-Charleston-Dorchester Council of Governments' (BCDCOG) updated Title VI Program on February 23, 2015 and revised information on February 27th. This Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the FTA Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

We have reviewed your program submittal and determined that it meets the requirements set out in the FTA's Title VI Circular, 4702.1B. Please plan to submit a Title VI Program by the next due date of April 1, 2018 by attaching it to your Recipient Profile in FTA's TEAM-Web. Your Title VI Program will expire 60 days after the due date, on May 31, 2018. If we have not received all required information by the time your Title VI Program expires, the BCDCOG may experience delays in processing grants or draw-down restrictions.

Thank you for your ongoing cooperation in meeting all of the FTA civil rights program requirements. A copy of this letter will be attached to your Recipient Profile in TEAM. Please contact me at (404) 865-5471 or at Carlos.Gonzalez3@dot.gov for any questions.

Sincerely,

Carlos A. Gonzalez

cc: Ronald E. Mitchum, Executive Director, BCDCOG (Electronic)
Dr. Yvette G. Taylor, Regional Administrator, FTA Region IV (Electronic)
Monica McCallum, Regional Division Chief, FTA Civil Rights (Electronic)