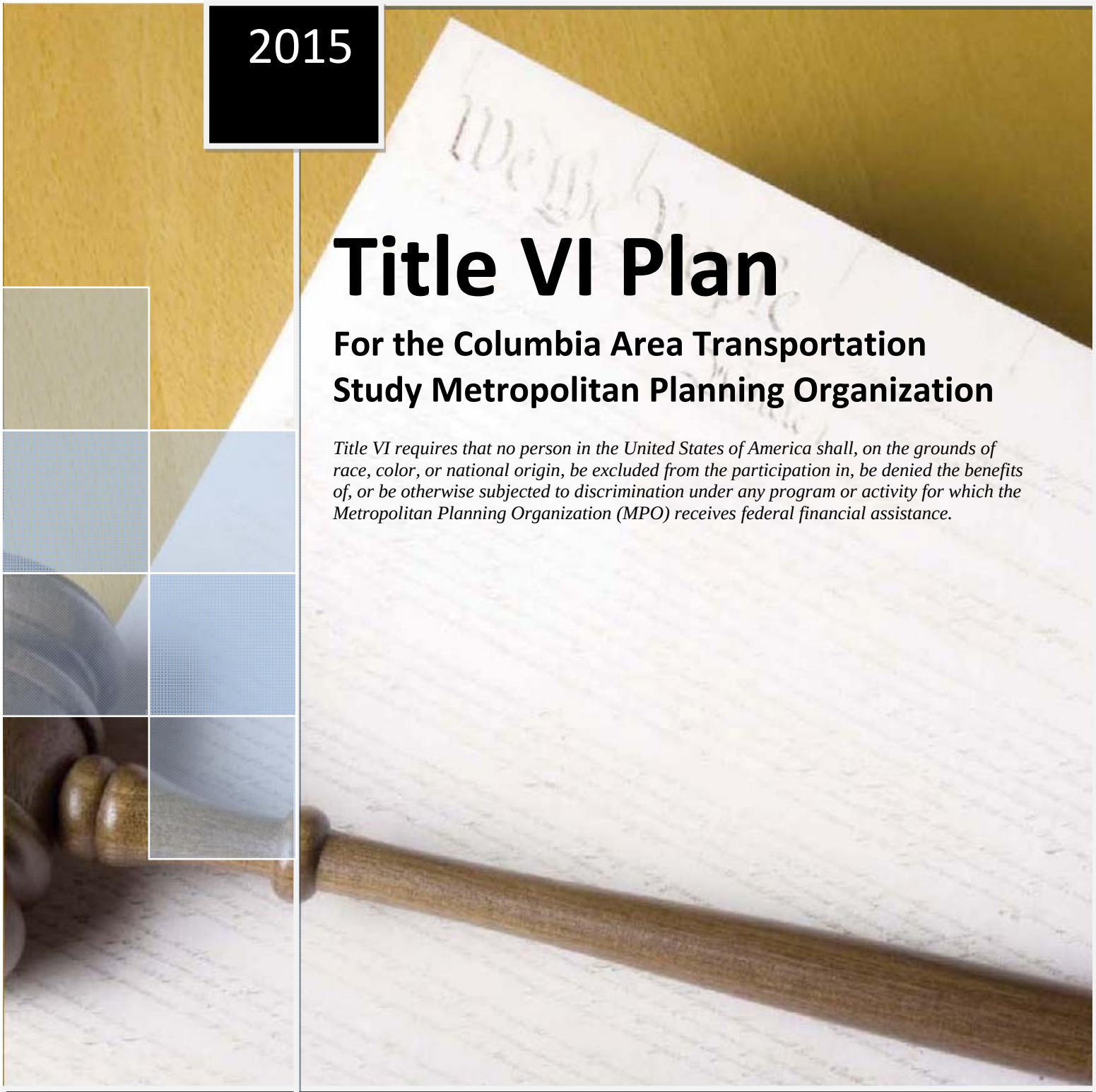
2015

Title VI Plan

For the Columbia Area Transportation Study Metropolitan Planning Organization

Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Metropolitan Planning Organization (MPO) receives federal financial assistance.



Central Midlands Council of Governments

May 28, 2015

RESOLUTION

A RESOLUTION APPROVING THE TITLE VI PROGRAM & PLAN PURSUANT TO THE CIVIL RIGHTS ACT OF 1964; APPROVING THE ASSOCIATED LIMITED ENGLISH PROFICIENCY PLAN; AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE SAID POLICY ON BEHALF OF THE CENTRAL MIDLANDSCOUNCIL OF GOVERNMENTS

WHEREAS, the Central Midlands Council of Governments is the designated Metropolitan Planning Organization (MPO) for transportation planning in the Columbia Urbanized Planning Area which includes all or parts of six counties; and

WHEREAS, to fund its many work activities, CMCOG receives direct or pass-through federal funding from agencies such as the US Department of Transportation (Federal Highway Administration and Federal Transit Administration); the US Department of Health & Human Services (US DHHS); and the US Department of Labor; and

WHEREAS, as a recipient of federal funds, CMCOG is required to comply with the requirements of Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin, specifically 42 USC 2000d, which states that: No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance; and

WHEREAS, CMCOG must also comply with the additional protections set forth in Presidential Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) and Presidential Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency); and

WHEREAS, in 2009, CMCOG did develop a Title VI Plan, and in May 2012, CMCOG did develop and adopt a Limited English Proficiency Plan and an updated transportation participation plan,; and

WHEREAS, as required by the Federal Transit Administration, CMCOG has expanded the Title VI Program & Plan to include all necessary elements; and

WHEREAS, the 2015 Title VI Program & Plan has been reviewed and approved through the Columbia Area Transportation Study Metropolitan Planning Organization.

NOW, THEREFORE, BE IT RESOLVED that the Central Midlands Council of Governments certifies compliance with policies, procedures and plans with regard to Title VI of the Civil Rights Act of 1964 (as amended) and additional Assurances as required and hereby adopts its 2015 Title VI Program & Plan; and

BE IT FURTHER RESOLVED that the Central Midlands Council of Governments directs staff to begin efforts immediately to implement the provisions of the 2015 Title VI Program & Plan.

THE UNDERSIGNED is the duly qualified Executive Director of Central Midlands Council of Governments, and hereby certify that the foregoing is a true and correct copy of a resolution adopted at a meeting of the Central Midlands Council of Governments held on May 28, 2015.

John N. Hardee, Chairman
Central Midlands Council of Governments

Benjamin J. Mauldin, Executive Director
Central Midlands Council of Governments

Witness

Witness

CENTRAL MIDLANDS COUNCIL OF GOVERNMENTS (CMCOG)
COLUMBIA AREA TRANSPORTATION STUDY (COATS)
METROPOLITAN PLANNING ORGANIZATION (MPO)

TITLE VI PROGRAM MANUAL

"It has been The Federal Highway Administration's (FHWA's) and the Federal Transit Administration's (FTA's) longstanding policy to actively ensure nondiscrimination under Title VI of the 1964 Civil Rights Act in Federally funded activities. Under Title VI and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, or national origin. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all program and activities of Federal-aid recipients, subrecipients and contractors whether those programs and activities are federally funded or not." (United States Department of Transportation)

Introduction

The Columbia Area Transportation Study (COATS) serves as the federally designated Metropolitan Planning Organization (MPO) and is responsible for ensuring that transportation programs utilizing federal funds in the Central Midlands region are based on a continuing, comprehensive, and coordinated planning process. COATS seeks to build a stronger regional community through cooperation, leadership and planning. Through COATS's leadership, area jurisdictions and diverse community interests sit down together to address the region's problems and identify the opportunities for cooperative solutions. These efforts, in turn, enhance the effectiveness of local government.

COATS plays an active leadership role in strengthening the metropolitan community by providing:

- A forum for addressing regional objectives and diverse community issues;
- Long-range planning and public policy coordination; and
- Technical assistance and services to enhance the effectiveness of local government.

Members

COATS serves portions of six-counties in the Central Midlands region, which includes separate city governments. COATS's boundaries include portions of the following counties:

- Richland
- Lexington
- Fairfield

- Newberry
- Kershaw
- Calhoun

COATS's Policy Committee consists of locally elected and appointed leaders (individuals appointed to their positions directly by locally elected officials) representing these units of government.

In addition to the above geographic jurisdictions, COATS also works closely with the following:

- Central Midlands Regional Transit Authority
- Santee Wateree Regional Transit Authority
- City of Columbia (urban core city)
- South Carolina Department of Transportation (SCDOT)
- Federal Transit Administration (FTA)
- Federal Highway Administration (FHWA)

Benefits of working with the MPO include a voice in key regional decisions, distribution of federal transportation dollars, technical assistance to obtain federal and state funding, education and training opportunities, data to meet special planning needs, access to Geographic Information Systems (GIS) databases, access to data products, and technical expertise.

Boards and Committees

COATS is governed by a Central Midlands Council of Governments (CMCOG) Board of Directors which consists of local leaders from the member units of government. Transportation planning at COATS is overseen by the CMCOG staff, which provides technical support and recommendations to the CMCOG Board. Committees are appointed by the individual boards based upon need. The following committees have been formed historically:

- *Transportation Subcommittee*
  The Transportation Subcommittee is responsible for making recommendations to the full Policy Committee regarding project priorities to be funded by various Federal Aid Highway Programs and included in the Transportation Improvement Program (TIP). Transportation Subcommittee meetings are scheduled on a monthly basis.

- *Technical Committee*
  The Technical Committee, which is established by the Policy Committee, is composed of the professional/technical representatives of member governments and public agencies having direct or indirect responsibility for transportation planning and/or implementation. Their primary responsibility is to monitor all technical activities including the annual development of a draft UPWP and TIP for recommendation to the Policy Committee. They also consider for recommendation to the Policy Committee all major studies and planning activities. Technical Committee meetings are scheduled on a monthly basis.

- *Executive Committee*
  The Executive Committee is made up of Policy Committee members and provides oversight of transportation planning activities. Executive Committee meetings are conducted on a monthly basis.

- *High Speed-Light Rail Committee*
  This Committee consists of members of the Policy Committee and other interested citizens. The High Speed-Light Rail Committee is established to research issues related to rail development and its impact on the transportation infrastructure in the region. High Speed-Light Rail Committee meetings are scheduled on a monthly basis.

- *Bike and Pedestrian Committee*
  This Committee consists of members of the Transportation Subcommittee, State and local governments, and other interested citizens. The Bike and Pedestrian Committee is established to research issues related to bicycle and pedestrian development and its impact on the transportation infrastructure in the region. Bike and Pedestrian Committee meetings are scheduled on a monthly basis.

Policy Statement and Authorities

The Columbia MPO (COATS) assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. COATS further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. In the event COATS distributes federal aid funds to another governmental entity, COATS will include Title VI language in all written agreements and will monitor for compliance.

COATS's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other COATS responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Benjamin J. Mauldin, Executive Director

5-28-15
Date

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 23 CFR 200.9 and 49 CFR 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid Recipients,

subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include: Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; 42 USC 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 28 CFR 50.

Organization

COATS's Transportation Planning Director serves as the Title IV Coordinator is responsible for ensuring implementation of the agency's Title VI program. The Transportation Planning Director is responsible for coordinating the overall administration of the Title VI program, plan, and assurances (See Appendix 1).

Five areas of COATS's work program have been identified as applicable to Title VI regulations – they are referred to as the five Title VI Program Areas:

1. Communications and public participation
2. Planning and programming
3. Environmental affairs
4. Consultant contracts
5. Education and training

The agency's Title VI-related responsibilities fall into two main categories – "general responsibilities," applicable to all five Title VI Program Areas, and "Program Area Responsibilities" that are specific to each Title VI Program Area. It is important to note that the first three Title VI Program Areas noted above are extremely interrelated – they have been treated separately for purposes of clarity and corresponding to agency organization. For example, the Communications and Public Participation program area applies to and affects the agency work program as a whole, particularly agency efforts and responsibilities related to planning, programming, and environmental affairs.

COATS's Transportation Planning Director (TPD) is generally responsible for overseeing Title VI compliance in each of the program areas. Other staff members are expected to provide information and support to assist this staff member perform his or her tasks.

General Responsibilities

The following are general Title VI responsibilities of the agency applicable to all five Title VI Program Areas. The TPD, with involvement and assistance from other members of staff, is responsible for ensuring these elements of the plan are appropriately implemented and maintained.

1. *Data Collection*. Statistical data on race, color, national origin, income level, language spoken, and sex of participants in, and beneficiaries of, federally funded programs is to be gathered and maintained as described in the "Program Area Responsibilities" section of this document. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program.

2. *Annual Report and Update*. An Annual Report and Update is to be submitted by the end of September each year, to SCDOT, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). The Title VI Coordinator is responsible for gathering information from appropriate staff members and consolidating this information into the final document. The final document is to include:

    a. A report on the previous year's Title VI-related activities and efforts, including accomplishments and program changes.
    b. An update on Title VI-related goals and objectives for the upcoming year.

3. *Annual Review of Title VI Program*. Each year, in preparing for the Annual Report and Update, the Title VI Coordinator will review the agency's Title VI program to assure compliance with Title VI. In addition, he or she will review agency operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate.

4. *Dissemination of Information Related to the Title VI Program*. Information on the agency's Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "Program Area Responsibilities" section of this document, and in other languages when needed.

5. *Resolution of Complaints*. Any individual may exercise his or her right to file a complaint with COATS, if that person believes that he or she or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, or national origin. COATS will make a concerted effort to resolve complaints as put forth in it's Title VI Complaint Procedure, found in Appendix 2.

Responsibilities of the Transportation Planning Director Regarding Title VI

The Title VI Coordinator is responsible for supervising staff activities pertaining to Title VI regulations and procedures set forth in federal guidance and according to COATS's Title VI Plan. In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process Title VI complaints received by COATS, as described in Appendix 2.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to COATS's Title VI program.

- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- If a federal funding recipient is found to not be in compliance with Title VI, work with staff involved with Consultant Contracts and the recipient to resolve the deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this plan.
- Review important Title VI-related issues with the Chairperson, as needed.
- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.

Responsibilities of Other Staff Members

Other staff members, under supervision of the Title VI Coordinator, will at times be asked to accept or share responsibility for day-to-day administration of the Title VI program, including implementation of the plan and Title VI compliance, program monitoring, reporting, and education within an applicable program area, as described in the "Program Area Responsibilities" section of this document. In addition, some staff members may be asked to accept responsibility for drafting text for an assigned section of the Annual Title VI Report and Update, and maintaining the data and documentation necessary for that report. These responsibilities may include reviewing guidelines and procedures for the assigned Title VI Program Area, and incorporating Title VI-related language and provisions into agency documents, as appropriate.

Program Area Responsibilities

- *Program Area 1: Communications and Public Participation*

Note: The Communications and Public Participation Program Area applies to and affects the agency work program as a whole, particularly agency efforts and responsibilities related to the Planning and Programming and Environmental Affairs Program Areas. It has been treated as a separate program area for purposes of clarity, and corresponding to agency organization. See Appendix 4 for the agencies adopted Public Participation Plan.

As stated in the agency's Public Participation Plan, "COATS's goal is to have significant and ongoing public involvement in the transportation planning process…COATS also seeks to empower the public to voice their ideas and values regarding transportation issues. COATS strives to ensure early and continuous public involvement in all major actions and decisions." This Public Involvement Plan provides the outline of COATS's procedures for ensuring open and effective communication with citizens in the Central Midlands region.

Principles of COATS's Public Participation Plan

- Equal access is an essential part of the public involvement process.
- Public notification is one of the primary functions of the Metropolitan Planning Organization.
- It is the responsibility of the agency to offer access to information and provide timely public notice, as well as to educate the public about the planning process.

Elements of COATS's Public Participation Plan

- *Meetings*: COATS's committee structure provides an opportunity for local governments and citizens to interact in order to address transportation and air quality issues. The committees allow those who work in the field and those with interests in transportation to meet on a regular basis to discuss issues, share information, and coordinate planning activities.

- *Website*: COATS maintains a website http://www.centralmidlands.org, which is updated regularly. This site includes information on the agency's responsibilities, programs, publications, and press releases; contact information for all staff; a search function; the Title VI Plan, complaint procedures, and complaint form; and will provide the ability for the public to provide comments on COATS's programs and policies.

- *Press releases*: Press releases are routinely sent to news media in the Central Midlands region, when press coverage of specific events or decisions is warranted.

- *Opportunities for public comment*: COATS routinely provides opportunities for public comment, and continues to work to fund new and innovative ways to solicit public comments and involve all segments of the population in the Columbia metropolitan region. Comments are accepted by phone, fax, email, US mail, and in person at any open meeting. See the section below entitled "Opportunities for Public Comments" for more information.

- *Staff is accessible*: Staff is accessible in person, on the phone, by mail, by fax, by email, or by online comment forms. Contact information for all staff is provided on the agency's website.

- *Events*: Events such as workshops, open houses, and forums are held on an as-needed basis. These events are open to the public.

Opportunities for Public Comments

COATS routinely offers different ways for people to comment on activities, programs, and decisions made at the agency. These ways are:

- *Comments are accepted at any time*: Comments are accepted via an online comment form, by phone, fax, email, US mail, and in person at any board or committee

meeting. Contact information for all staff is provided on the agency website, and contact information for COATS is included in all publications produced for COATS. COATS makes every effort to respond to all comments received.

- *Citizen comments are requested at meetings*: All COATS Board and committee meetings are open to the public. Meeting dates are posted well in advance on the agency's website. Public comments and responses made during these meetings are kept on record in the official meeting summaries. The Board maintains mailing lists, to which anyone can request to be added.

- *Formal public comment periods for major activities*: Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, the proposed distribution of funds, major amendments to the Transportation Improvement Program (TIP), changes to COATS policies (such as the Public Involvement Plan), and updates to COATS's Long-Range Transportation Plan (LRTP). The comment period is highlighted in via a legal notice, as well as other agency publications, on the COATS website, and in various press releases. Comments can be made in person, using a comment form on the agency's website, by email, by US mail, fax, or telephone. COATS will make every effort to respond to any comments received, and will forward comments to other agencies when appropriate. Received comments and staff responses will be reviewed at the next applicable committee meeting(s), at which time the committee(s) will determine whether it is appropriate to proceed with the recommended action.

Strategies for Engaging Title VI Protected Groups

COATS realizes that there are large segments of the population from whom input is rarely if ever received. In an effort to hear a truly representative voice of the public, COATS will take the approach of "going to the public," in addition to receiving public comment from and educating those already interested and involved. As part of this effort, COATS will take the following steps on its major efforts involved with the LRTP:

- *Plan meeting locations carefully*: Public meetings should be held in locations that are accessible by public transit. Also, facilities should be compliant with the Americans with Disabilities Act. If a targeted population is located in a certain geographic area, then the meeting location should be in that area for their convenience.

- *Seek help from community leaders and organizations*: To facilitate involvement of traditionally underserved populations, community leaders and organizations that represent these groups should be consulted about how to most effectively reach their members. Relationships with these groups should be maintained for future partnerships in the planning process.

- *Provide services for the disabled*: Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public involvement will include contact information for people needing these or other special accommodations. Requests must be made at least 24 hours in-advance of the meeting for support.

- *Be sensitive to diverse audiences*: At public meetings, COATS staff should attempt to communicate as effectively as possible. Technical jargon should be avoided and appropriate dress and conduct are important. For some meetings, it may be best to use trained facilitators or language translators to better communicate with the audience.

Title VI Responsibilities

Staff involved in public involvement is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's public involvement process. These staff members will:

- Ensure that all communications and public involvement efforts comply with Title VI.

- Develop and distribute information on Title VI and agency programs to the general public. Provide information in languages other than English, as needed.

- Disseminate information to minority media and ethnic/gender related organizations, to help ensure all social, economic, and ethnic interest groups in the region are represented in the planning process.

- Include the Title VI Notice to the Public, full or abbreviated versions, in relevant press releases and on the agency website.

- Notify affected, protected groups of public hearings regarding proposed actions, and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.

- Collect statistical information on attendees of public meetings to track how well different segments of the population are represented.

- Encourage COATS's committee structure to include representation from Title VI relevant populations.

- *Program Area 2: Planning and Programming*

COATS is responsible for developing long- and short-range transportation plans to provide efficient transportation services to the Columbia metropolitan area. A comprehensive transportation planning process is used, which entails the monitoring and collection of carried data pertaining to transportation issues. COATS coordinates with SCDOT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed.

Operational Guidelines

Primary guidance is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450
- The Moving Ahead for Progress in the 21st Century (MAP-21)
- State and Federal Clean Air Acts and Amendments

Key Planning and Programming Activities

As the designated MPO for the Central Midlands region, COATS receives federal funds to develop regional transportation plans and programs and to coordinate technical and policy studies on a wide range of transportation and other programs. The primary products of the transportation planning process include:

- Long-Range Transportation Plan (LRTP)
- Transportation Improvement Program (TIP)
- Public Participation Plan (PPP)
- Congestion Management Process/Plan (CMP)
- Unified Planning Work Program (UPWP)

Considerations of Title VI

Considerations of Title VI legislation are made throughout COATS's planning and programming activities, for example:

LRTP: The development of COATS's long range transportation plan includes an environmental justice analysis to ensure that the burdens and benefits of planned transportation activities are equitably distributed across racial and socio-economic groups. COATS staff reviewed the impacts that planned programs and projects would have on low-income and minority residents in such areas as transportation investments, effect of projects on travel times of area residents, and access to transit.

Transportation Improvement Program (TIP): The region's seven-year TIP includes an analysis of effects of planned transportation investments on disadvantaged residents similar to that of 2035 LRTP.

Title VI Responsibilities

Staff members involved in planning and programming are responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's planning and programming processes. These staff members will:

- Ensure that all aspects of the planning and programming process operation comply with Title VI.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data. Make the document available to the public and member agencies on COATS's website or in hard copy format, if requested.
- Develop a process for assessing the distributional effects of transportation investments in the region as part of actions on plan and programming documents.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process

➢ *Program Area 3: Environmental Affairs*

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of regional transportation planning, environmental justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

Operational Guidelines

- Executive Order 12898 on environmental justice, and federal and state administrative guidelines for implementing environmental justice requirements.

Title VI Responsibilities

Staff members are responsible for evaluating and monitoring environmental justice compliance with Title VI. Staff members will:

- Ensure Title VI environmental justice compliance.

- Analyze and make findings regarding the population affected by the action.

- Analyze and make findings regarding the impacts of planned projects on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.

- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all agency public participation procedures. This includes dissemination to groups representing minority media and ethnic/gender related organizations, and the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

➢ *Program Area 4: Consultant Contracts*

COATS is responsible for selection, negotiation, and administration of its consultant contracts. COATS operates under its internal contract procedures and all relevant federal and state laws.

Operational Guidelines

- Title 49 – FTA Grant Contracting Requirements
- Title 23, CFR 172 – Administration of Engineering and Design related Service Contracts

Contract Procedures

COATS's contract procedures are outlined in the "CMCOG Handbook". COATS verifies Title VI compliance by consultants (subrecipients of federal funds) in the contracting process. Signature of the terms of the contract is used to verify compliance on the part of the consultant. In addition, Title VI text is included in all COATS Requests for Proposals.

Title VI Responsibilities

Title VI responsibilities associated with consultant contracts include the following:

- Ensure inclusion of Title VI language in contracts and Requests for Proposals (RFP).
- Review consultants for Title VI compliance as described below:
  - Ensure that all consultants verify their compliance with Title VI procedures and requirements.
  - If a recipient or subrecipient is found to not be in compliance with Title VI, the Title VI Coordinator and relevant staff will work with the recipient or subrecipient to resolve the deficiency status and will write a remedial action if necessary.

➢ *Program Area 5: Education and Training*

Minorities, women, veterans, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in all employment-related decisions, including opportunities for education and training.

Employees Encouraged to Participate in Training

All CMCOG employees are encouraged to participate in professional development and training. All materials received by the agency on training and education opportunities are made available to all employees, which includes all information on federally funded training, such as courses provided by the National Highway Institute (NHI) and National Transit Institute (NTI).

Title VI Responsibilities

Under the category of education and training, Title VI responsibilities include:

- Assisting in the distribution of information to COATS staff on training programs regarding Title VI and related statutes.
- Ensure equal access to, and participation in, applicable NHI and NTI courses for qualified CMCOG employees.
- Track staff participation in Title VI, NHI and NTI courses.
- Establish, maintain, and update Title VI general information pertaining to the administration of COATS's Title VI program, as well as related documents (such as a complaint form).

Questions

For questions on COATS's Title VI Plan and Procedures, please contact the Title VI Coordinator at 803.376.5390 or by email at rsimmons@centralmidlands.org. For information on COATS's work programs or publications, please see the CMCOG website.

LIMITED ENGLISH PROFICIENCY

Introduction/Policy Statement

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq**., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities, and sub-recipients.

Plan Summary

The Columbia Area Transportation Study (COATS) Metropolitan Planning Organization (MPO) has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the MPO's extent of obligation to provide LEP services, the MPO undertook a U.S.

Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the region to be served or likely to encounter an MPO program, activity, or service; 2) the frequency with which LEP individuals come in contact with an MPO program; 3) the nature and importance of the program, activity or service provided by the MPO to the LEP population; and 4) the resources available to the MPO and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analyses

1. **The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity, or service.**

The MPO examined 2009 – 2013 American Community Survey data and determined that approximately 42,225 people, or 6.9% of the COATS population 5 or older, spoke a language other than English at home. Approximately 57% of this population lives in Richland County, 40% live in Lexington County, and approximately 3.1% live in Kershaw, Newberry, Fairfield and Calhoun Counties combined. Of the total population not speaking English at home, 8,835, or approximately 21%, reported that they do not speak English "very well." Hispanics comprised of 77% of the non-English speaking language group.

2. **The frequency with which LEP individuals come in contact with an MPO program, activity, or service.**

The MPO assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying public meeting attendees. From January 1 to December 31, 2014, the MPO recorded no requests for a Spanish speaking interpreter and zero requests for translated MPO documents.

3. **The nature and importance of the program, activity, or service provided by the MPO to LEP Community.**

The largest geographic concentration of Hispanics is in Richland County at 57%. Lexington County has approximately 40% and Kershaw County has 3%. The counties of Calhoun, Newberry, and Fairfield are less than 1%. The MPO works with local Hispanic Outreach Organizations to identify the transportation concerns of the Hispanic community. The MPO is aware that many in this community do not drive and rely on public transit, walking, or biking. To help accommodate the Hispanic population, the MPO will work with the transit providers to translate their system route maps and brochures; and with our local governments to translate bicycle and pedestrian safety brochures into Spanish.

4. The resources available to the MPO and overall costs.

The MPO assessed its available resources that could be used for providing LEP assistance. This included identifying what staff and volunteer language interpreters are readily available, how much a professional interpreter and translation service would cost, which documents should be translated, taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts, examining which financial and in-kind sources could be used to provide assistance, and what level of staff training is needed. After analyzing the four factors, the MPO developed the plan outlined in the following section for assisting persons of limited English proficiency.

How to Identify an LEP Person who Needs Language Assistance.

Below are tools to help identify persons who may need language assistance:

- The MPO will examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When MPO sponsored public meetings, workshops or conferences are held, the MPO will set up a sign-in sheet table and have a staff member greet and briefly speak to each attendee. To informally gage the attendee's ability to speak and understand English, the MPO staff will ask a question that requires a full sentence reply;
- The MPO will have the Census Bureau's "I Speak Cards" at the meeting, workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. The MPO will also, have the cards available at the MPO office reception area; and
- The MPO will post a notice of available language assistance at MPO reception area.

Language Assistance Measures

When an interpreter is needed, in person or on the telephone, the MPO will determine what language is required. MPO staff can provide an informal interpretation in German and French. If staff is not available, persons can check the Central Midlands Council of Governments (CMCOG) website at: www.centralmidlands.org, to see what languages are offered. If the required language is not available or if a formal interpretation is required, staff shall use a translation service. Staff may be able to assist with written communications and small MPO document translation requests from LEP persons. If not, a translation service shall be used for a fee. MPO documents can be made available in another language, such as Spanish, upon request.

MPO Staff Training

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities;
- What language assistance services the MPO offers;
- Use of LEP "I Speak Cards";
- How to access a staff interpreter;
- How to use a translation service;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating sub-recipients on the MPO's LEP program responsibilities and their obligation to provide language assistance.

Providing Notice of Available Language Service to LEP Persons

- The MPO will post signs that language assistance is available in public areas such as the reception area.
- Outreach Techniques:
    - 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, meeting notices, fliers, advertisements, and agendas may be printed in an alternative language, such as Spanish.
    - Spanish speaking staff or a hired interpreter will be on hand at public meetings intended for gathering public input upon request.
    - The MPO will also 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 7 working days before the meeting date."

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO 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 1, 2018.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the COATS MPO?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified MPO programs? Are there other programs that should be included?
- Have the MPO's available resources, such as technology, staff, and financial costs changed?
- Has the MPO fulfilled the goals of the LEP Plan? and
- Were any complaints received?

Dissemination of the MPO Limited English Proficiency Plan

The MPO will post the LEP Plan on its website at www.centralmidlands.org. 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 County libraries offer free internet access. Copies of the LEP Plan will be provided to the South Carolina Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy. Each MPO sub-recipient will be provided a copy and will be educated on the importance of providing language assistance. LEP persons may obtain copies/translations of the plan upon request.

Record Title VI Investigations, Complaints, or Lawsuits

During the current period of 2009-2012, to date, CMCOG has not had any complaints or lawsuits brought against it or its sub-recipients by entities that alleged discrimination on the basis of race, color, or national origin.

Ensure inclusive public participation

CMCOG engages in a process to inform the public of our transportation activities. Through this process, CMCOG seeks participation that facilitates identification of community values, development of policies, and implementation of plans that matter to residents and communities, ensuring competitive advantage and preserving long-term sustainability. CMCOG takes numerous steps to engage low-income, minority, LEP, and disabled persons in its public participation process, taking into account the specific needs and characteristics of these groups. These steps are outlined below:

I. Ensure diverse representation on CMCOG Board and Committees board and committees

The CMCOG Board of Directors includes both elected officials and appointed citizen members. All members of the Board, regardless of their race or gender, represent all persons in their community. Forty-nine members comprise the CMCOG Board - 31 local elected officials and 19 private citizens. The table below provides a breakdown of minority representation in the regional decision-making process:

CENTRAL MIDLANDS COUNCIL OF GOVERNMENTS (Membership Breakdown by Race) Caucasian	African American	Hispanic	Native American	Asian American	Other	Total
32	17	1	0	0	0	50
64%	34%	2%	0%	0%	0%	100%

II. Establish criteria to determine low-income, minority and LEP persons/communities to target for outreach

CMCOG develops environmental justice assessment maps in order to identify the areas of concentration of low-income, minority, 65and over, and LEP persons. CMCOG also works with groups within its structure to determine and identify low-income, minority, 65 and over, and LEP communities to target for outreach.

CMCOG coordinates with its member governments to access databases containing the names and addresses of regional residents, including low income communities, minority communities, and disabled communities who receive periodic mailings related to the planning activities.

III. Develop techniques to engage low-income, minority, and LEP Persons in discussions on transportation planning efforts

CMCOG utilized several techniques to engage low-income, minority, and LEP persons in CMCOG transportation planning activities. Below is a summary of the techniques utilized:

- Publish notices of public meetings and information on transportation planning activities in major media and media targeted to minority communities,;

- Form special committees and partnerships to assist CMCOG outreach to the targeted communities, such as the Central Midlands Regional Transit Authority, Regional Development Committee, the Human Services Transportation steering committee, and activities sponsored by our member governments;

- Participate in speaking engagements on transportation issues targeted to diverse groups throughout the region;

- Ensure all Board and Committee meetings are open to the public, including Transportation Technical Committee, Transportation Subcommittee, and the MPO Policy Committee.

Regional Population Percentages							
	COATS Region	Richland COATS	Lexington COATS	Kershaw COATS	Calhoun COATS	Newberry COATS	Fairfield COATS
Population	657,395	382,849	245,032	23,040	2,687	1,850	1,937
Minority Population	252,762	200,457	45,164	4,896	514	666	1,065
% Regional Minority Population	**38.45%**	**79.31%**	**17.87%**	**1.94%**	**0.20%**	**0.26%**	**0.42%**
Hispanic Population	32,792.00	18,643.00	13,061.00	1,056.00	32.00	-	-
% Regional Hispanic Population	**4.99%**	**56.85%**	**39.83%**	**3.22%**	**0.10%**	**0.00%**	**0.00%**
Over 65 Populatoin	73,213	38,731	30,985	2,587	467	187	256
% Regional Over 65	**11.14%**	**52.90%**	**42.32%**	**3.53%**	**0.64%**	**0.26%**	**0.35%**
Households	248,373	141,272	95,743	8,725	1,093	756	784
Households below Poverty	35,066	22,801	10,963	1,026	111	87	78
% Regional Households below Poverty	**14.12%**	**65.02%**	**31.26%**	**2.93%**	**0.32%**	**0.25%**	**0.22%**

APPENDIX 1

COATS Title VI Assurances

The COATS MPO HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

2. The COATS MPO will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.

3. The COATS MPO will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

Benjamin J. Mauldin — 5-28-15

Benjamin J. Mauldin, Executive Director — Date
CMCOG/COATS MPO

Benjamin J. Mauldin

(SIGNATURE OF AUTHORIZED OFFICER)

APPENDIX 2

Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the federally funded programs of the Columbia Area Transportation Study MPO (COATS). For Title VI complaints against other agencies, or if you believe you have suffered housing or employment discrimination, please contact the appropriate agency.

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The COATS MPO has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter VII of the Federal Transit Administration Circular 4702.1A, dated May 13, 2007. If you believe that COATS's federally funded programs have discriminated your civil rights on the basis of race, color, or national origin you may file a written complaint by following the procedure outlined below:

TITLE VI COMPLAINT PROCEDURE

1. *Submission of Complaint*. Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the MPO may file a written complaint with CMCOG's Executive Director. A sample complaint form may be downloaded or is available in hard copy from the COATS MPO. Such complaints must be filed within 180 calendar days after the date the discrimination occurred. Note: Upon request, assistance in the preparation of any necessary written material will be provided to a person or persons who are unable to read or write. Complaints should be mailed to:

   Central Midlands Council of Governments
   Executive Director
   236 Stoneridge Drive
   Columbia, SC 29210

2. *Referral to Review Officer*. Upon receipt of the complaint, CMCOG Executive Director shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint, in consultation with an approved CMCOG Attorney. The Complainant

shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later then 45 calendar days after the date the MPO received the complaint. If more time is required, CMCOG Executive Director shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the MPO's processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to CMCOG Executive Director for concurrence. If CMCOG Executive Director concurs, he or she shall issue the MPO's written response to the Complainant. Note: Upon receipt of a complaint, COATS shall forward a copy of this complaint and the resulting written response to the appropriate SCDOT, and FTA-Region 4 contacts.

3. *Request for Reconsideration*. If the Complainant disagrees with CMCOG Executive Director's response, he or she may request reconsideration by submitting the request, in writing, to CMCOG Executive Director within 10 calendar days after receipt of CMCOG Executive Director's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by CMCOG Executive Director. CMCOG Executive Director will notify the Complainant of his or her decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where CMCOG Executive Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

4. *Appeal*. If the request for reconsideration is denied, the Complainant may appeal CMCOG Executive Director's response by submitting a written appeal to the MPO Board no later than 10 calendar days after receipt of CMCOG Executive Director's written decision rejecting reconsideration.

5. *Submission of Complaint to the State of South Carolina Department of Transportation*. If the Complainant is dissatisfied with the MPO's resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of South Carolina of Transportation for investigation.

South Carolina Department of Transportation
Office of Civil Rights
955 Park Street
P.O. Box 191
Columbia, SC 29202

APPENDIX 3

Title VI Complaint Form

COATS MPO

The purpose of this form is to assist you in filing a complaint with the Columbia Area Transportation Study MPO (COATS). You are not required to use this form; a letter containing the same information will be sufficient. It is important, however, to include all information related, whether or not the form is used.

Complaint Form

Instruction: If you would like to submit a Title VI complaint to the Central Midlands Council of Governments, please fill out the form below and send it to: Central Midlands Council of Governments, Attn: Reginald Simmons, 236 Stoneridge Drive, Columbia, SC 29210. For questions, please contact Reginald Simmons at (803) 376-5390 or rsimmons@centralmidlands.org. For a copy of the CMCOG full Title VI Plan, see our website at www.centralmidlands.org, or contact our office at (803) 376-5390.

<table>
<tr><td>1. Name (Complainant):</td><td>2. Phone:</td><td rowspan="2">3. Home address (street #, city, state, zip):</td></tr>
<tr><td colspan="2">4. If applicable, name of person(s) who allegedly discriminated against you:</td></tr>
<tr><td colspan="2">5. Location and position of person(s) if known:</td><td>6. Date of alleged incident:</td></tr>
<tr><td colspan="3">7. Discrimination because of:

☐ Race / color ☐ Sex (including sexual harassment) ☐ Vietnam Era Veteran
☐ National origin ☐ Sexual orientation ☐ Disabled Veteran
☐ Creed / religion ☐ Marital status ☐ Low Income
☐ Disability ☐ Age ☐ Retaliation</td></tr>
</table>

8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.
9. What specifically do you want Central Midlands Council of Governments to do about your complaint?
10. What other steps have you taken to try to resolve this complaint? What resulted from your attempts to resolve this complaint?
11. Please give other details that your feel would be helpful as it relates to the complaint and /or a resolution in this matter?

12. What remedy are you seeking for the alleged discrimination?
13. Have you filed this complaint against this agency before? If yes, when and with whom was it filed?
14. Have you filed any other complaints against this agency before? If yes, when and against whom were they filed. Please give a brief description of each complaint. What is the status of each complaint? Name: Date: Address: Phone number:
15. Have you filed this complaint with any other federal, state or local agency; or with any federal or state court? Name: Agency: Address: Phone number:

16. Are you represented by an attorney with regard to anything related to this matter? Name: Agency: Address: Phone number:
17. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses, fellow employees, supervisors, others): Name: Job title: Address: Phone number:
18. Please sign below. You may attach any written materials or other information you think is relevant to your complaint. We cannot accept your complaint unless it's been signed.

Signature:	Date:

Please feel free to add additional sheets to explain the present situation to us. Please mail the completed, signed Discrimination Complaint Form (please make one copy for your records) to:

Central Midlands Council of Governments
Executive Director
236 Stoneridge Drive
Columbia, SC 29210
Phone: (803) 376-5390

APPENDIX 4

Public Participation Plan

COATS's approved Public Participation Plan may also be accessed at on the MPO website at www.centralmidlands.org, or you may contact the CMCOG office to request a hard copy.

INTRODUCTION

The Columbia Area Transportation Study (COATS) Metropolitan Planning Organization (MPO) policy is to support and encourage public participation and to adhere to the principles of Environmental Justice in the metropolitan planning process. The MPO's 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.

I. BACKGROUND

The Central Midlands Council of Governments (CMCOG) is a public agency created by the Counties of Fairfield, Lexington, Newberry and Richland, and the cities of Batesburg/Leesville, Cayce, Columbia, Forest Acres, Irmo, Lexington, Newberry, Springdale, West Columbia, and Winnsboro, as enabled by state planning law. The agency was organized in 1969 and has been providing planning, management and technical assistance to its member governments and local transit service providers since its inception. CMCOG has been charged with responsibility for area-wide transportation planning since its inception and serves as the designated Metropolitan Planning Organization (MPO) for transportation program/project purposes.

The CMCOG Board is comprised of citizens, business leaders, state and local elected officials representing the CMCOG member governments. This Board meets regularly to establish transportation policies and evaluate transportation needs for the region. Only officials who represent the member governments located in the MPO study area are eligible to vote on MPO activities.

In addition to its own technical staff, the MPO has four standing advisory committees:

- Transportation Subcommittee
- Technical Committee
- Rail Transit Committee
- Bicycle & Pedestrian Committee

The Transportation Subcommittee is responsible for making recommendations on all CMCOG transportation plans and programs to the CMCOG Board. The Subcommittee is comprised of elected officials from the CMCOG member governments within the MPO Boundary and members are appointed by the local governments and affirmed by the CMCOG Board Chair.

The Technical Committee serves as an advisory group to the Transportation Subcommittee. The Technical Committee is made up of State, County and City planning and engineering staff, which provide technical expertise in the development of transportation plans and programs for the MPO area.

The Rail Transit Committee is composed of elected officials and citizens that are responsible for providing recommendations on transit plans and projects. Rail Transit Committee members are recommended by their local government body and affirmed by the CMCOG Board Chair.

The Bicycle & Pedestrian Committee is composed of citizens that are responsible for providing recommendations on regional bicycle and pedestrian plans and projects. Bicycle & Pedestrian Committee members are appointed by their respective local governments. Each Committee may also appoint ad hoc committees (working groups) to oversee MPO planning projects. The MPO staff consists of a Director, two professional Planners, and an Administrative Secretary. On a regular basis the committees, along with the MPO staff, provide recommendations to the MPO Board regarding short and long range planning, implementation of projects and related issues. The CMCOG Board and each of its advisory committees operate under bylaws approved by the CMCOG Board.

The principal responsibilities of the MPO include the development of a Long Range Transportation Plan (LRTP), a Congestion Management Plan, a Transportation Improvement Program (TIP), a Unified Planning Work Program (UPWP), and related planning studies and projects deemed necessary to address transportation issues in the COATS area. Local transportation needs are re-evaluated annually. Based on this evaluation, project priorities are established and made part of the CMCOG's biennial Transportation Improvement Program. This information is forwarded to the South Carolina Department of Transportation (SCDOT) for inclusion into the statewide Work Program.

By Federal law, all multi-modal transportation improvement projects must be included in and consistent (to the maximum extent feasible) with the MPO's LRTP in order to be eligible for Federal funding. Therefore, the MPO LRTP is the primary plan that guides all federally funded transportation improvements in the COATS area.

II. GOVERNMENTAL REQUIREMENTS

With the passage of the Transportation Equity Act for the 21st Century (TEA-21) in 1998, the 15 metropolitan and 23 statewide planning factors from the old regulations were consolidated into seven (7) factors. With the recent passage of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) in 2005, these factors were expanded to eight (8), namely safety and security were separated into separate planning factors. In addition, the planning factor on protect/enhance the environment was expanded to include "...promote consistency between transportation improvements and State and local planned growth and economic development patterns". These eight (8) planning factors remained unchanged with

the passage of newest legislation; Moving Ahead for Progress in the 21st Century (MAP-21). These factors are:

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
2. Increase the safety of the transportation system for motorized and non-motorized users;
3. Increase the security of the transportation system for motorized and non-motorized users;
4. Increase the accessibility and mobility of people and for freight;
5. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
7. Promote efficient system management and operation, and;
8. Emphasize the preservation of the existing transportation system.

Additionally, MPOs are required to develop and adopt a long-range transportation plan and a transportation improvement program. In developing these documents, by federal statute, a reasonable opportunity to comment must be provided.

III. PUBLIC PARTICIPATION PROCESS

A. General Guidelines

The *CMCOG Public Participation Plan* is intended to provide direction for public participation activities to be conducted by the COATS MPO and contains the vision, goals, objectives, and techniques used by CMCOG for public participation. As noted earlier, CMCOG has been designated by the federal government to serve as the regional MPO for the COATS Transportation Program. Therefore, in its public participation process, CMCOG will strive to:

1. Provide timely information about transportation issues and processes to citizens, affected public agencies, representatives of transportation agencies, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties and segments of the community affected by transportation plans, programs and projects (including but not limited to local jurisdiction concerns).

2. Provide reasonable public access to technical and policy information used in the development of the LRTP, TIP, UPWP, and other appropriate transportation plans and

projects, and conduct open public meetings where matters related to transportation programs are being considered. Such access would also include, if necessary, the conversion of the key planning documents into Spanish (or any other language).

3. Give adequate public notice of public participation activities and allow time for public review and comment at key decision points, including but not limited to, the approval of the LRTP, TIP, UPWP, and other appropriate transportation plans and projects. If the final draft of any transportation plan differs significantly from the one available for public comment by CMCOG and raises new material issues, which interested parties could not reasonably have foreseen, an additional opportunity for public comment on the revised plan shall be made available.

4. Respond in writing to all applicable public input. When significant written and oral comments are received on the draft transportation plan (including the financial plan) as a result of the public participation process, a summary, analysis, and report on the disposition of comments shall be made part of the final plan.

5. Solicit the needs of those traditionally under-served by existing transportation systems, including but not limited to minorities, elderly, persons with disabilities, persons with limited English proficiency, and low-income households.

6. Provide a public comment period of 45 calendar days prior to the adoption of the *CMCOG Public Participation Plan* and/or any amendments for the groups listed in Item 1 above. Notice of the 45-day comment period will be advertised in a newspaper of general circulation, minority community newspapers, and various other publications prior to the commencement of the 45-day comment period and on CMCOG's website. Notice will also be mailed to the entire CMCOG mailing list prior to the commencement of the 45-day comment period.

7. Provide a public comment period of not less than 30 calendar days prior to adoption of the LRTP, TIP, UPWP, Transit Development Plans, any amendments or updates, and other appropriate transportation plans and projects.

8. Coordinate its Public Participation Process with statewide Public Participation Processes wherever possible to enhance public consideration of the issues, plans and programs, and reduce redundancies and costs.

9. Periodically review the Public Participation Process to ensure it provides full and open access to all. Portions of the process which are found not to meet the needs of the constituency will be revised.

B. Public Participation Plan Vision, Goals & Policies

The vision for the public participation plan is that the public will be provided thorough information on transportation planning services and project development in a convenient and timely manner. To this end, the following goals and policies have been established.

Goal 1: To actively engage the public in the transportation planning process according to the policies contained in Federal and State law as well as in this Public Participation Plan.

A. CMCOG shall maintain an up-to-date database of contacts including at a minimum the following persons:

- Federal, state, local agencies responsible for planned growth, economic development, environmental protection, airport operations, freight movements, land use management, natural resources, consideration, and historic preservation
- Elected Officials
- Local Government Staff
- Transportation Agencies (freight, port, airports, transit, etc.)
- Representatives of Users of Public Transportation
- Representatives of Users of Pedestrian and Bicycle Transportation
- Representatives of the Disable
- Local Media
- Homeowners' Associations
- Civic Groups
- Special Interest Groups
- COATS Area Public Libraries (for public display)
- Individuals expressing an interest in transportation planning activities.

B. CMCOG shall, when feasible, electronically send and/or mail meeting announcements (invitations) to CMCOG contact list or to targeted groups for upcoming activities.

C. CMCOG shall employ visualization techniques to depict transportation plans. Examples of visualization techniques include: charts, graphs, photo interpretation, maps, use of GIS, artist renderings, physical models, and/or computer simulation.

Goal 2: CMCOG shall keep the public informed of on-going transportation related activities on a continuous basis.

A. CMCOG shall make all publications and work products available to the public via internet, staff office, and employ visualization techniques to describe transportation actions as part of the LRTP.

B. Staff shall be available to provide general and project-specific information at a central location during normal business hours and after hours at the request of groups such as homeowners' associations with reasonable notice.

C. CMCOG shall maintain a COATS section on their website.

1. The website shall be updated and maintained to provide the most current information available.
2. The website shall, at a minimum, contain the following information:
   - Current MPO Staff contact information (i.e. name, title, mailing address, phone, fax, and e-mail)
   - Meeting calendars and agendas
   - Brief descriptions of current projects
   - Work products and publications (e.g. TIP, LRTP, UPWP)
   - Comment/Question form
   - Links to related agencies (e.g. SCDOT and the Central Midlands Regional Transit Authority)

Goal 3: CMCOG shall encourage the participation of all citizens in the transportation planning process.

A. Target audiences shall be identified for each planning study conducted by CMCOG, including residents, business and property owners and those traditionally underserved and underrepresented populations, including but not limited to, low income and minority households, within the study area.

B. CMCOG shall, whenever feasible, hold public meetings at a scheduled time, location, and building facility convenient to potentially affected citizens.

C. CMCOG will provide an additional opportunity for public comments, if the final LRTP or TIP differs significantly from the version that was initially made available for public comment.

Goal 4: CMCOG shall strive to continuously improve public participation.

A. CMCOG shall continuously evaluate public participation techniques, according to the procedures contained in this Public Participation Plan.

B. The Public Participation Plan shall be reviewed and adopted, with revisions if necessary, at least every three (3) years.

Goal 5: CMCOG shall participate in public participation activities for individual transportation improvement projects from the planning phase through construction.

A. CMCOG shall actively assist SCDOT, local governments and transportation agencies in the development and implementation of public participation techniques for planning and other studies, including Major Investment Studies and Project Development and Environmental studies.

IV. Current Public Participation Techniques

Public participation is an ongoing activity of the MPO. An effective public participation process is characterized by techniques and procedures that enable citizens to become well informed. This section contains descriptions of public participation tools of which CMCOG currently uses and proposes to use in the future. These tools are as follows:

- Annual Newsletters
- Charrettes
- Comment Forms
- Consultation
- Display Ads
- Direct Mailings
- E-mail Announcements/Internet Message Boards
- Fact Sheets
- Legal Advertisements
- MPO Master Database
- MPO Website
- Press Releases
- Public Information Meetings/Hearings
- Public Notices
- Small Group Meetings
- Surveys
- Title VI & Environmental Justice Review
- Visualization

Annual Newsletter

Description: MPO (CMCOG) staff produces an annual newsletter that is distributed to citizens, municipalities, media and other agencies. Citizens are added to the distribution list by their own request.

Opportunities to request being added to the list occur during public meetings hosted by CMCOG on the CMCOG web site and when citizens contact CMCOG staff. Each issue of the newsletter includes staff contact information, upcoming meeting schedules, the CMCOG web site address, project highlights, and current planning project status reports. When appropriate, information regarding significant transportation issues, MPO awards, and other one-time activities are also included.

Activities: The newsletter is used to report planning studies, publications and work products from the past year.

Charrette

Description***:*** Charrettes are typically intense, possibly multi-day meetings involving municipal officials, planning officials and local residents. A charrette is instrumental in identifying key issues early, promotes joint ownership of the solution and attempts to diffuse traditional confrontation between stakeholders.

Activities: Project specific meetings, corridor studies, sub-area studies, other planning studies and workshops.

Comment Forms

Description: Comment forms are often used to solicit public comment on specific issues being presented at a workshop or other public meeting. Comment forms can be very general in nature, or can ask for very specific feedback. For example, a comment form may ask for comments on specific alignment alternatives being considered during a corridor study, or may ask for a person's general feelings about any aspect of transportation. Comment forms can also be included in publications and on websites to solicit input regarding the subject of the publication and/or the format of the publication or website.

Activities: Public workshops, open houses, hearings and other meetings, general MPO activities.

Consultation

Description: As part of MAP-21 regulations in encouraging more cooperative planning, CMCOG will consult, as appropriate, with agencies and officials responsible for other planning activities that are affected by transportation within the COATS area. To coordinate the planning function to the maximum extent practicable, such consultation will entail comparing LRTPs and TIPs as they are developed with the plans, maps, inventories, and planning documents developed by other agencies. This consultation will include, as appropriate, contact with the following groups: State, local, Indian Tribal, and private agencies responsible for planned growth, economic development, environmental protection, airport operations, freight movements, land use management, natural resources, consideration, and historic preservation. CMCOG maintains an open consultation policy, whereby any private citizen or entity responsible for transportation in the COATS area may contact CMCOG and be included in the consultation process.

Activities: Public hearings/meetings, copies of this plan on the CMCOG website (for viewing/downloading purposes), meetings with CMCOG Staff.

Display Ads

Description: These ads are used to promote meetings that are not regularly scheduled, such as corridor study workshops. They are published in the local section of the newspaper in order to reach a larger audience than those that typically read legal ads.

Activities: Project specific meetings, workshops, open houses or hearings.

Direct Mailings

Description: Direct Mailings are used to announce upcoming meetings or activities or to provide information to a targeted area or group of people. Direct mailings are usually post cards, but can be letters or fliers. An area may be targeted for a direct mailing because of potential impacts from a project. Groups are targeted that may have an interest in a specific issue, for example avid cyclists and pedestrians may be targeted for pathways and trail projects.

Activities: Project-specific meetings, workshops, open houses, corridor studies, small-area studies, other planning studies or major activities.

E-mail Announcements/Internet Message Boards

Description: Meeting announcements and MPO information would be e-mailed to interested persons that have submitted their e-mail addresses to CMCOG staff. Interactive message boards would be used to facilitate discussion and solicit public comment regarding specific MPO projects or issues.

Activities: Corridor studies, small-area studies, other planning studies, regular meetings, public hearings, workshops, open houses, and other major MPO activities.

Fact Sheets

Description: Fact Sheets will be used to provide summary information regarding MPO policy, programs and projects. Fact sheets can be distributed at public meetings, on the CMCOG website, and in public places such as libraries and community centers. Individuals and special interest groups can request fact sheets directly from the CMCOG staff office.

Activities: Corridor studies, sub -area studies, other planning studies, project priorities process, updates to the LRTP and TIP and other MPO activities.

Legal Advertisements

Description: SCDOT requires a minimum thirty (30) day advertisement of any public meeting where a decision could be made that would make a significant change to an existing plan or program. Ads are published to solicit public comment and/or review of the requested change or plan update. The ads provide a description of the meeting agenda, including contact information.

Activities: Corridor studies, sub-area studies, other planning studies, project priority process, major TIP amendments, updates of the LRTP and UPWP, and other major MPO activities.

MPO Master Database

Description: Staff maintains a master database of all contacts, both business and public, on a continuous basis. The database includes committee membership, mailing information, phone numbers, fax numbers, and e-mail addresses. The database is used for maintaining up-to-date committee membership lists, special interest groups and homeowner association contacts, and the newsletter mailing list. Membership lists generated using the database are provided to the public,

municipalities and other agencies upon request. The database will be used to establish and maintain a list of e-mail contacts for electronic meeting notification and announcements.

Activities: The database is used to enhance other public participation activities.

MPO Website

Description: The MPO website is found within CMCOG's website, under the link "Transportation Planning". The site provides basic information about the services of CMCOG, the MPO process, its members, meeting times and committee and contact information. The site has been expanded recently to include information about specific projects undertaken by CMCOG and the MPO. MPO publications and work products, such as the UPWP, TIP, LRTP, and the Public Participation Plan, are available for downloading from the site. Also, citizens are able to submit comments and sign up to be added to the various distribution lists maintained by CMCOG. The site provides many links to other transportation related sites from the local to the national level. The site is maintained and updated by CMCOG staff.

The website address is www.centralmidlands.org/transplan.asp.

Activities: The site is used to promote regular and special meetings, planning studies, publications and work products.

Press Releases

Description: Formal press releases are sent to local media (newspaper, TV and radio) to announce upcoming special meetings and activities and to provide information on specific issues being considered by the MPO or their committees.

Activities: Specific corridor or other planning studies, workshops, open houses, public hearings, and other special MPO activities

Public Informational Meetings

Description: These are public meetings that are generally open and informal, with project team members interacting with the public on a one-on-one basis. Short presentations may be given at these meetings. The purpose of public informational meetings is to provide project information to the public and to solicit public comment.

Activities: Corridor studies, sub-area studies, other planning studies, project priority process, certification review, LRTP update, and other major MPO activities.

Public Notices

Description: The MPO regularly advertises the CMCOG Board, the Transportation Subcommittee, the Technical Committee, the Rail Transit Committee and the Bicycle & Pedestrian Committee meetings.

Activities: Regular monthly meetings, other public meetings.

Small Group Meetings

Description: During projects such as planning studies, meetings are held with small groups that have an interest in the project. Meetings could be with homeowners or neighborhood associations, civic groups, special interest groups, or other groups of affected or interested parties.

Activities: Corridor studies, sub-area studies, other planning studies, and other MPO activities.

Surveys

Description: Surveys are used when very specific input from the public is desired. A survey can be used in place of comment cards to ask very specific questions such as whether a person supports a specific alignment in a corridor study. Surveys are also used to gather technical data during corridor and planning studies. For example, participants may be asked about their daily travel patterns.

Activities: Corridor studies, sub-area studies and other planning studies.

Title VI & Environmental Justice Review

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs and activities on the basis of race, color, and national origin. Then in 1994, Presidential Executive Order 12898 directed every Federal agency to make Environmental Justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations." In complying with the aforementioned federal laws and policies, the MPO's Environmental Justice initiatives will strive to involve the potentially affected public through a Public Outreach Program. This program consists of MPO staff activities designed to develop partnerships with, and enhance their participation in the transportation planning process, by groups and individuals of “traditionally underserved” communities. These communities include minorities, low income, the elderly, and persons with disabilities. Staff

activities include, but are not limited to, MPO staff participation in groups and coalitions serving within these communities, targeted communications with local media outlets, conducting meetings at times and locations that are accessible to transit dependant or non-driving individuals when possible, and publication of MPO documents in non-technical, accessible formats when needed. The goal of the MPO's Public Outreach Program is to ensure that all citizens, regardless of race, color, religion, income status, national origin, age, gender, disability, marital status, or political affiliation, have an equal opportunity to participate in the MPO's decision-making process.

Description: CMCOG will take reasonable steps to ensure that all persons, including those with a disability or language barrier, have meaningful opportunities to participate in the transportation planning and programming process, and will strive to address environmental justice issues at all stages of the planning process. This includes implementing the following strategies to reduce participation barriers for under-served groups and engage them in the decision-making process:

- Representatives of minority, disability, low-income and limited English proficiency groups will be identified and included in MPO mailings.
- Key planning documents will be translated and public notices broadcasted for Spanish-speaking populations.
- Whenever possible, meetings will be held at locations accessible to persons with disability, bus riders, and bicyclist and that are convenient to neighborhoods with a concentration of minority and low-income persons.
- Where meeting facilitators are used, CMCOG will seek to use persons that represent the diversity of the community and/or have expertise in working with under-served groups.
- Translators/interpreters will be provided for meetings, if requested.

Activities: Corridor studies, sub-area studies, other planning studies, LRTP update and other major MPO activities.

Visualization

Description: CMCOG recognizes that an important element to public participation is to provide the public, when possible, visual as well as written descriptions of transportation projects. Through visual imagery, the complex features of proposed transportation plans, policies, and programs can be portrayed at appropriate scales—region, local, project architecture, etc.—and from different points of view. To this end, CMCOG will utilize various visual and architectural design techniques; some of which may include: sketches, drawings, artist renderings, aerial photography, mapping, simulated photos, videos, computer

modeled images, interactive geographical information system (GIS), GIS-based scenario planning tools, photo manipulation and computer simulation.

Activities: Planning studies, TIP amendments, and other MPO activities.

V. Summary Table of Public Participation Policies

Program Adoption	Public Meetings	Comment Period	Notes
Long Range Transportation Plan (LRTP)	2 meetings prior to CMCOG Board approval	30 days	A summary of all oral or written comments will be provided to the CMCOG Board and made available for public review.
Transportation Improvement Program (TIP)	2 meetings prior to CMCOG Board approval	30 days	
Unified Planning Work Program (UPWP)	N/A	30 days	
Public Participation Plan (PPP)	N/A	45 days	Will be held for updates of the PPP as needed
Amendments			
Long Range Transportation Plan (LRTP)	1 meeting if requested prior to CMCOG Board approval. A public meeting will be held on major amendments	15 days	
Transportation Improvement Program (TIP)	1 meeting if requested prior to CMCOG Board approval. A public meeting will be held on major amendments	15 days	
Unified Planning Work Program (UPWP)	N/A	15 days	
Public Participation Plan (PPP)	N/A	15 days	
Open Meetings			
CMCOG Board	Regular meetings held the Fourth Thursday of every month		
Transportation Subcommittee	Monthly Meeting are scheduled for the Second Thursday		
Technical Committee	Monthly Meeting are scheduled for the Fourth Tuesday		

VI. PUBLIC PARTICIPATION TECHNIQUES FOR FUTURE CONSIDERATION

Other techniques used for future consideration include:

Project-specific Web Sites

Description: For individual projects, such as corridor studies, that are typically performed using consulting services, project-specific web sites are often used. These sites are used when project information is too extensive to be included on the CMCOG site. Project web sites can contain study area maps, meeting announcements, descriptions of potential alternatives, comment forms, user surveys and project team contact information.

Activities: Corridor studies, sub -area studies, other planning studies and major MPO projects.

Project-specific Newsletters

Description: For individual projects, such as corridor studies, that are typically performed using consulting services, newsletters are often used to address specific project issues. These newsletters are mailed to targeted residents, elected officials representing that area, businesses and property owners in the area that are expected to be impacted by a particular study. Information regarding upcoming project meetings, alternatives being proposed in the area, and other project news is reported in these newsletters.

Activities: Corridor studies, sub -area studies, other planning studies or major activities.

Other Newsletters

Description: When project-specific newsletters are not used, articles may be prepared for publication in other newsletters produced by municipalities, homeowners' associations, church groups, civic groups, or others that may have an interest in the project. These articles are subject to the publication dates and space restrictions of the individual publishers.

Activities: Corridor studies, sub -area studies, other planning studies or major activities.

MPO Logo

Description: A logo representing the MPO is used to identify products and publications of the MPO. A logo helps the public become familiar with the different activities of the MPO by providing a means of recognizing MPO products.

Activities: A logo should be used on all MPO publications, including those developed by consultants working on MPO sponsored projects.

Formal Public Hearings

Description: These are public meetings used to solicit public comment on a project or issue being considered for adoption by the MPO. Hearings provide a formal setting for citizens to provide comments to the MPO or another decision-making body. They are recorded and transcribed for the record.

Activities: LRTP and TIP updates, corridor studies, project development & environmental studies, and other planning studies as needed for other MPO activities.

Government Access Television

Description: The local cable network provider as part of basic cable service maintains local channels of government and business advertisements. Government Access Television can broadcast rolling message scripts and regular and special meetings; both live and pre-recorded, as well as short informative programs about departmental activities or projects of interest to the entire population.

Activities: Corridor studies, sub-area studies, other planning studies, regular and special MPO activities.

Posters and Fliers

Description: Posters and fliers are used to announce meetings and events and are distributed to public places such as city halls, libraries and community centers for display. The announcement may contain a brief description of the purpose of a meeting, the time(s) and location(s), and contact information. Posters and fliers may be used to reach a large audience that cannot be reached using direct mailings and/or newsletters.

Activities: Corridor studies, sub-area studies, other planning studies, regular and special MPO activities.

VI. EVALUATION METHODS AND PERFORMANCE GOALS

In order to determine the effectiveness of the public participation tools, they must be evaluated and compared to established performance goals. The typical methods for evaluating the effectiveness of public participation tools are surveys and quantitative statistical analysis. This section briefly describes evaluation methods to be used by CMCOG. For each public participation tool, performance goals and methods for meeting those goals have been identified.

Surveys

Surveys typically consist of short, specific questions regarding public participation tools that are ongoing or that were used on a specific project. Surveys can be conducted in person, by phone, mail or e-mail. Face-to-face and telephone surveys provide quick responses and can be used when a respondent's answer may lead to a follow-up question. For example, respondents may be asked if advertisements are an effective notification tool. If the response is no, the surveyor can ask the respondent why advertisements are not effective and also what other tools they would prefer. In person and telephone surveys can target specific areas or groups or can be random sampling. Mail surveys may be used to provide written record of respondent's answers. Mail-back surveys can be distributed at meetings, inside other publications, or by mailing directly to potential respondents. Respondents can be a targeted group, such as members of special interest groups or residents of specific areas, or they can be randomly generated. Return postage for mail surveys typically can be pre-paid by the MPO, or can be the responsibility of the respondent. E-mail surveys, like mail surveys, provide a written record of responses. Unlike mail-back surveys, there is little to no reproduction or distribution cost to the MPO to send out the surveys, and little to no cost to respondents to return a response. To use e-mail surveys, it is necessary to have e-mail addresses for the targeted respondents, and random distribution is not really an option. Surveys will be used to evaluate citizens' responses on the effectiveness of the public participation tools.

Statistical Analysis

Statistics can be used to determine the "return on the investment" of producing public participation tools. For example, the number of persons attending an activity can be compared to the number of persons that were notified of the activity. This type of evaluation can be an indicator of whether or not the tools used for public participation are actually reaching the intended audience, or which tools had a greater response rate. Statistical analysis will be used to evaluate survey responses and the results of the analysis will be compared to the evaluation measures to determine the rate of success of the public participation tools.

VII. IMPROVEMENT STRATEGIES

CMCOG (MPO) continually strives for improved public participation. Improvements should be made to increase public awareness and to improve the quantity and quality of information provided to the public. The decisions made by CMCOG affect the entire population, both

residents and visitors. Therefore, seeking public input on those decisions is vital to the success of CMCOG as the organization responsible for transportation planning. Within one month after the completion of an activity or at milestones during an activity, evaluation of public participation tool should occur. For ongoing activities, evaluation should occur at least quarterly. Each time a public participation evaluation is performed, a list of improvement strategies should be identified for implementation. If improvement is needed for an ongoing public participation task, a reasonable completion date should be established. If improvement is needed for one-time activities, such as corridor studies, the improvement should be implemented where appropriate on future activities.

Summary Table for Evaluation Public Participation Tools

Public Participation Tool	Evaluation Criteria	Performance Goals	Methods to Meet Goals
MPO Web Site	Number of Hits	Min. of 50 hits per month, 5 % increase in hits per quarter	Use other public involvement tools to increase advertisement of the web site.
MPO Master Database	Number of returned items	Max. of 2% return rate per mailing	Make immediate corrections when items are returned.
Legal Advertisements	No Measure / Required bySouth Carolina Statutes	N/A	N/A
Annual Newsletter	Calls, letters, etc.; Number of returns	N/A. Return rate is addressed under MPO Master Database	Continue items that receive favorable comments and correct or improve mistakes or items that receive negative comments.
Display Ad	Calls, letters, etc.; Number of persons contacted	Min. of 15% of meeting attendees/survey respondents indicated that they saw the ad. Ad formats may be modified based on specific comments received	Pursue publication in a prominent location in the paper. Increase the size or modify the layout to make ads more visible.
Direct Mailings	Calls, letters, etc.; Number of persons contacted	Min. of 15% of meeting attendees/survey respondents indicated that they received the mailing. -OR- Reaches a min. of 85% of persons that are affected by a project.	Increase/Decrease mailing list to more accurately target affected areas. Use the most up-to-date information from the respective county's Property Assessor's Office to maintain the mailing list.
Press Releases	Calls, letters, etc.	No standard. Format may be modified based on specific comments received.	Encourage publication of press releases by keeping the media informed.
Small Group Meetings	Calls, letters, etc.; Met the expectations of the group	N/A. These meetings are held at the request of affected groups.	MPO staff and any consulting staff should be available in a timely manner to hold small group meetings regarding any MPO activity or issue. The meeting should be formatted to provide specific information requested by the group and should highlight issues that are of interest to the group.

E-mail Announcements/Internet Message Boards	Calls, letters, etc.; Number of persons reached	Min. of 5% of meeting attendees/survey respondents indicated that they saw the announcement.	Increase e-mail list by advertising the availability of email announcements using other public involvement tools.
Public Hearings	Calls, letters, etc.	3%-5% of affected population (based on study area) in attendance.	Schedule hearings at convenient and accessible times and locations. Use other public involvement tools to increase awareness of hearings.
Comment Forms	Calls, letters, etc.; Number of persons contacted	45% of meeting attendees filled out form-OR- 2% of visitors to a web site submitted a form -OR- 15% of mail recipients return the form.	Encourage responses by explaining the importance of receiving comments in order to improve the planning process
Surveys	Calls, letters, etc.; Number of responses	45% of contacted persons participate in the survey - OR- 15% of mail recipients return the survey	Encourage responses by explaining the importance of receiving feedback to improve the planning process.

APPENDIX 5

Notice to the Public

The paragraph below will be inserted into all significant publications that are distributed to the public, such as future versions and updates of the Long Range Transportation Plan. The text will be placed permanently on the agency's website. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

> *The Central Midlands Council of Governments hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Metropolitan Planning Organization (MPO) receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with CMCOG. Any such complaint must be in writing and filed with CMCOG's Title VI Coordinator within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discriminatory Complaint Form, please see our website at www.centralmidlands.org.*

A shortened version of the above paragraph, such as the example below, may be used in publications where space or cost is an issue:

> *CMCOG fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information or to obtain a Title VI Complaint Form, please visit our website at: www.centralmidlands.org, or call 803.376.5390.*

APPENDIX 6

Data Collection & Reporting Requirements

COATS will comply with the following data collection and reporting requirements as outlined in FTA Circular 4702.1A:

General Reporting Requirements:
All applicants, recipients, and subrecipients are required to maintain and provide to FTA the information outlined below. The information is required under DOJ regulation and must be submitted prior to the approval of any grant application. Recipients and subrecipients should provide updated information as conditions warrant. Updates must at a minimum be provided every three years. Information previously submitted under the General Reporting Requirements may be referenced in subsequent submissions, as appropriate.

All applicants, recipients, and subrecipients shall maintain and submit the following general requirements:

a. A list of any active lawsuits of complaints naming the applicant, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. The list should include: the date the lawsuit or complaint was filed; a summary of the allegation; and the status of the lawsuit or complaint, including whether the parties to the lawsuit have entered into a consent decree. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part (e.g., not all information on all modes of transportation).

b. A description of all pending applications for financial assistance, and all financial assistance currently provided by other Federal agencies. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.

c. A summary of all civil rights compliance review activities conducted in the last 3 years. The summary should include: the purpose or reason for the review; the name of the agency or organization that performed the review; a summary of the findings and recommendations of the review; and, a report on the status and/or disposition of such findings and recommendations. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.

d. A signed FTA Civil Rights Assurance that all of the records and other information required under Circular 4702.1A have been or will be compiled, as appropriate, and maintained by the applicant, recipient, or subrecipient. In the case of State administered programs, this assurance should be provided by the primary and subrecipient (Appendix 1).

e. For construction projects, a fixed-facility impact analysis to assess the effects on minority communities. If this information has been prepared as a result of an environmental assessment or environmental impact statement, the applicant, recipient, or subrecipient should reference the relevant information by document, page number(s), and date of submission to FTA. The analysis should include:

- A discussion of the potential impact on minority communities and minority-owned businesses during and after construction;
- A discussion of all potential negative environmental impact, such as noise, air, or water pollution;
- A detailed list of minority-owned businesses and households that will be affected by the construction project;
- A description of other significant changes or impacts on the minority community, such as increased traffic, reductions in the amount of available parking, etc.; and
- A description of the relocation program and/or other measures adopted by the applicant that will be used to mitigate any identified adverse social, economic, or environmental effect of the proposed construction project.

APPENDIX 7

Social Equity Analysis

To determine the location and concentrations of low income and minority populations in the COATS MPO region, CMCOG used a methodology described by the Mid-Ohio Regional Planning Commission in a USDOT case study for environmental justice analysis.[1] The methodology involved a three step process that included (1) determining the regional percentages of low income and minority populations (2) using the regional percentages as thresholds for determining whether or not a particular Census Block Group is considered to be predominantly low income or minority (3) mapping these thresholds (individually and together) to provide a visual representation of the spatial distribution of low income and minority populations.

The criteria used to identify and map low income and minority populations included the following four 2009 - 2013 American Community Survey variables:

- Non-white population
- Hispanic population
- 65 and older
- Families below the Poverty Line

The totals and percentages of these variables for the COATS region and for the COATS portions of Richland, Lexington, Kershaw, Newberry, Fairfield, and Calhoun counties are summarized in the table

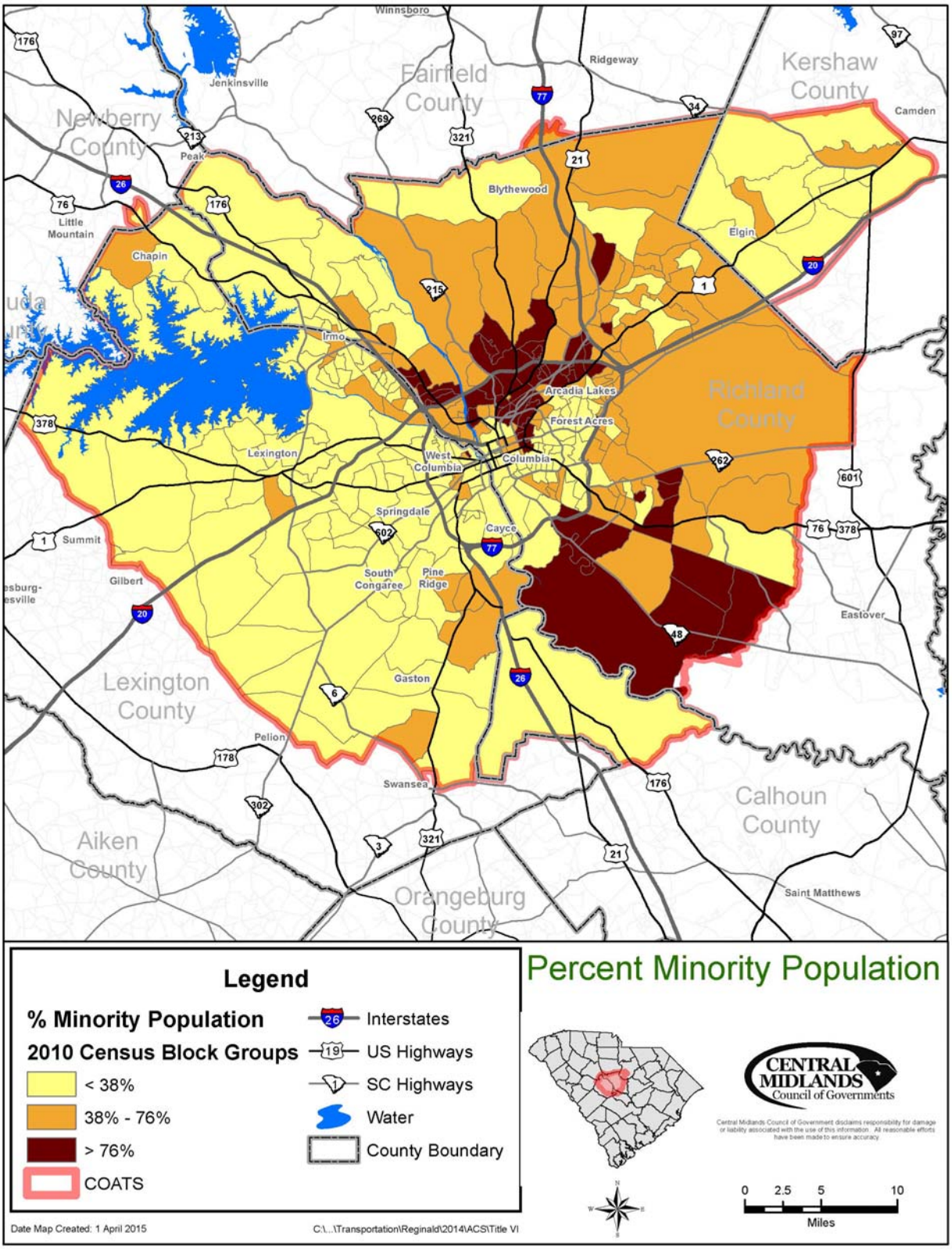
Environmental Justice Profile of the COATS Region

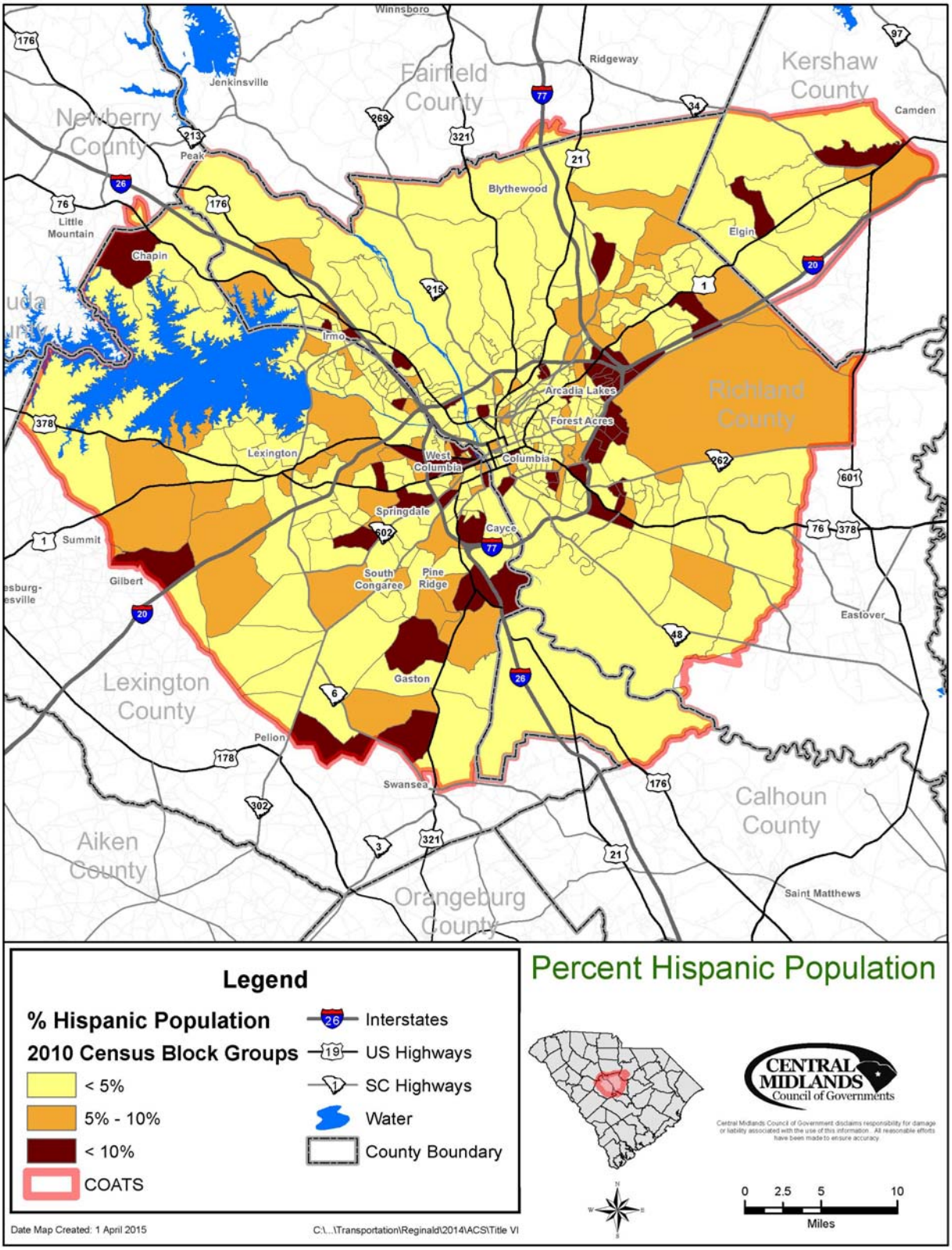
	COATS Region	Richland COATS	Lexington COATS	Kershaw COATS	Calhoun COATS	Newberry COATS	Fairfield COATS
Population	657,395	382,849	245,032	23,040	2,687	1,850	1,937
Minority Population	252,762	200,457	45,164	4,896	514	666	1,065
% Minority Population	**38%**	**52%**	**18%**	**21%**	**19%**	**36%**	**55%**
Hispanic Population	32,792	18,643	13,061	1,056	32	-	-
% Hispanic Population	**5%**	**5%**	**5%**	**5%**	**1%**	**0%**	**0%**
Over 65 Populatoin	73,213	38,731	30,985	2,587	467	187	256
% Over 65	**11%**	**10%**	**13%**	**11%**	**17%**	**10%**	**13%**
Households	248,373	141,272	95,743	8,725	1,093	756	784
Households below Poverty	35,066	22,801	10,963	1,026	111	87	78
% Households below Poverty	**14%**	**16%**	**11%**	**12%**	**10%**	**12%**	**10%**

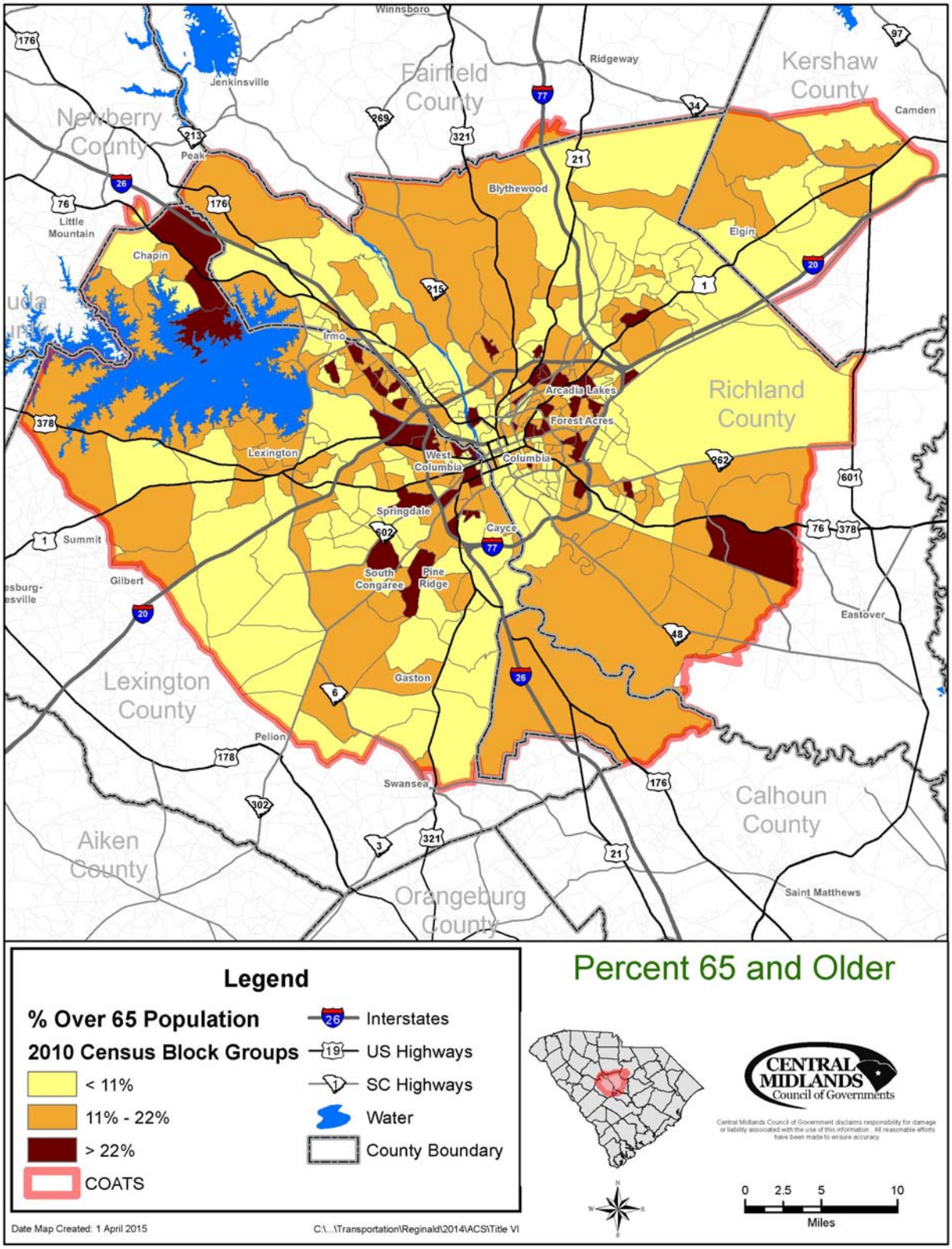
Note: Military populations are not considered to be exposed to the same level of risk for environmental justice concerns as civilian populations.

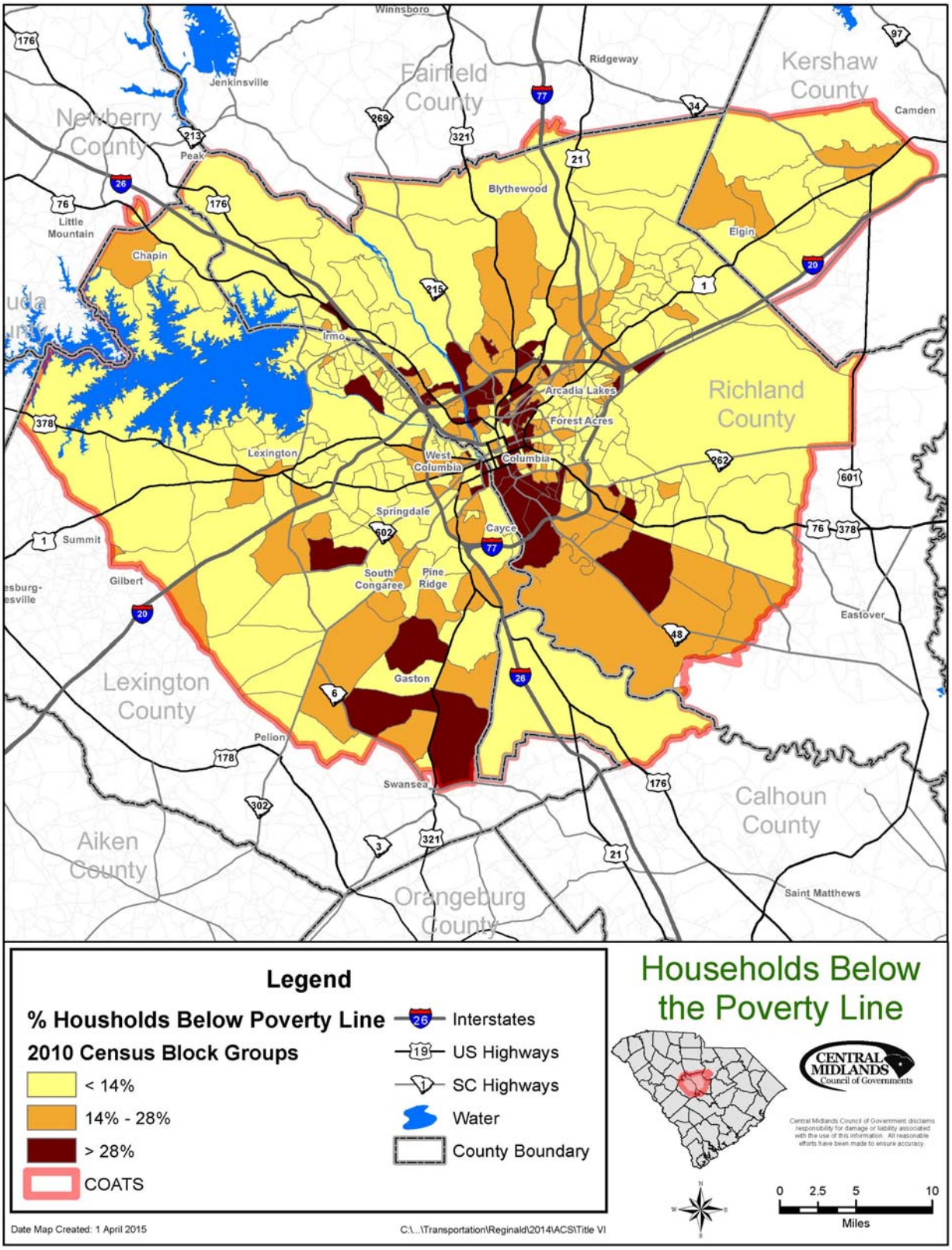
According to these regional totals, minority populations make up 38.4% of the total population of the COATS region with the largest share (approximately 79%) residing in Richland County. The Hispanic population represents 5% of the total population with the largest share (approximately 56%) residing in Richland County. In addition the 65 and older population represents 11.1% of the total population with the largest share (approximately 52%) residing in Richland County. As well, the poverty population makes up 14% of the total population with the largest share (approximately 65%) residing in Richland County.

The following maps illustrate the areas of the region where the percentages of minority, Hispanic, and 65 and older populations exceed the regional percentage thresholds as defined in the Environmental Justice Profile on Page 50. The families below the poverty line are also illustrated. The last map illustrates the highest concentrations of all four of these variables combined which represent areas most vulnerable to environmental justice issues.


Winnsboro
Ridgeway
Kershaw County
Camden
Fairfield County
Jenkinsville
Newberry County
Peak
Blythewood
Elgin
Little Mountain
Chapin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Lexington
West Columbia
Columbia
Springdale
Cayce
Summit
Gilbert
South Congaree
Pine Ridge
Eastover
Gaston
Lexington County
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Saint Matthews
Legend
% Minority Population
2010 Census Block Groups
< 38%
38% - 76%
> 76%
COATS
Interstates
US Highways
SC Highways
Water
County Boundary
Percent Minority Population
CENTRAL MIDLANDS Council of Governments
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 2.5 5 10
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI


Winnsboro
Ridgeway
Kershaw County
Camden
Fairfield County
Jenkinsville
Newberry County
Peak
Blythewood
Elgin
Little Mountain
Chapin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Lexington
West Columbia
Columbia
Springdale
Cayce
Summit
Gilbert
South Congaree
Pine Ridge
Eastover
Lexington County
Gaston
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Saint Matthews
Legend
% Hispanic Population
2010 Census Block Groups
< 5%
5% - 10%
< 10%
COATS
Interstates
US Highways
SC Highways
Water
County Boundary
Percent Hispanic Population
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 2.5 5 10
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI


Winnsboro
Ridgeway
Fairfield County
Kershaw County
Camden
Jenkinsville
Newberry County
Peak
Blythewood
Elgin
Little Mountain
Chapin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Lexington
West Columbia
Columbia
Springdale
Cayce
Summit
Gilbert
South Congaree
Pine Ridge
Eastover
Lexington County
Gaston
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Saint Matthews
Legend
% Over 65 Population
2010 Census Block Groups
< 11%
11% - 22%
> 22%
COATS
Interstates
US Highways
SC Highways
Water
County Boundary
Percent 65 and Older
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 2.5 5 10
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI


Winnsboro
Ridgeway
Kershaw County
Camden
Fairfield County
Jenkinsville
Newberry County
Peak
Blythewood
Elgin
Little Mountain
Chapin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Lexington
West Columbia
Columbia
Springdale
Cayce
Summit
Gilbert
South Congaree
Pine Ridge
Eastover
Gaston
Lexington County
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Saint Matthews
Legend
% Housholds Below Poverty Line
2010 Census Block Groups
< 14%
14% - 28%
> 28%
COATS
Interstates
US Highways
SC Highways
Water
County Boundary
Households Below the Poverty Line
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 2.5 5 10
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI

APPENDIX 8

Social Equity Analysis

To determine the location and concentrations of low income and minority populations in the CMCOG region, CMCOG used a methodology described by the Mid-Ohio Regional Planning Commission in a USDOT case study for environmental justice analysis.[2] The methodology involved a three step process that included (1) determining the regional percentages of low income and minority populations (2) using the regional percentages as thresholds for determining whether or not a particular Census Block Group is considered to be predominantly low income or minority (3) mapping these thresholds (individually and together) to provide a visual representation of the spatial distribution of low income and minority populations.

The criteria used to identify and map low income and minority populations included the following four 2009 – 2013 American Community Survey variables:

- Non-white population
- Hispanic population
- 65 and older
- Families below the Poverty Line

The totals and percentages of these variables for the CMCOG region are summarized in the table

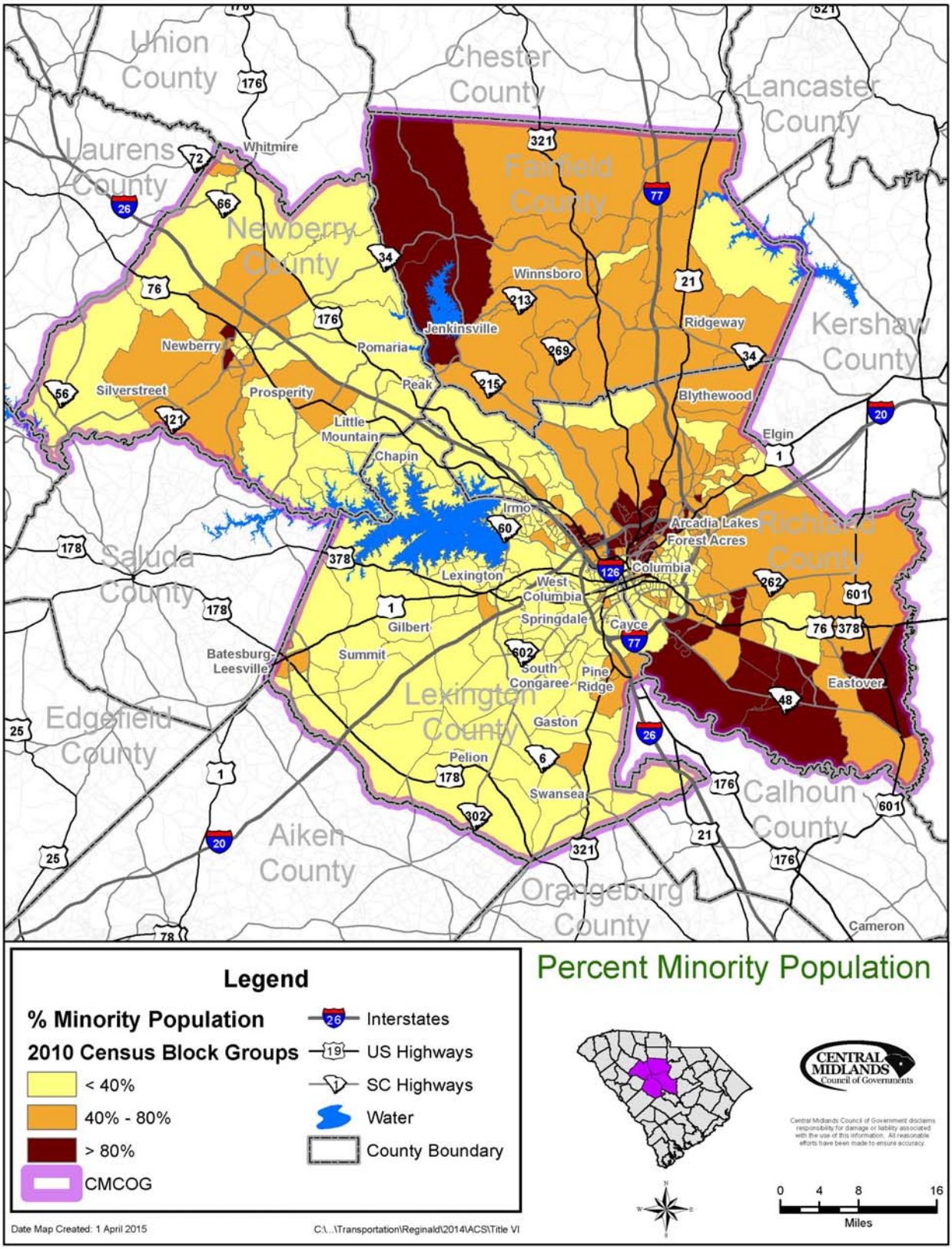
Environmental Justice Profile of the CMCOG Region

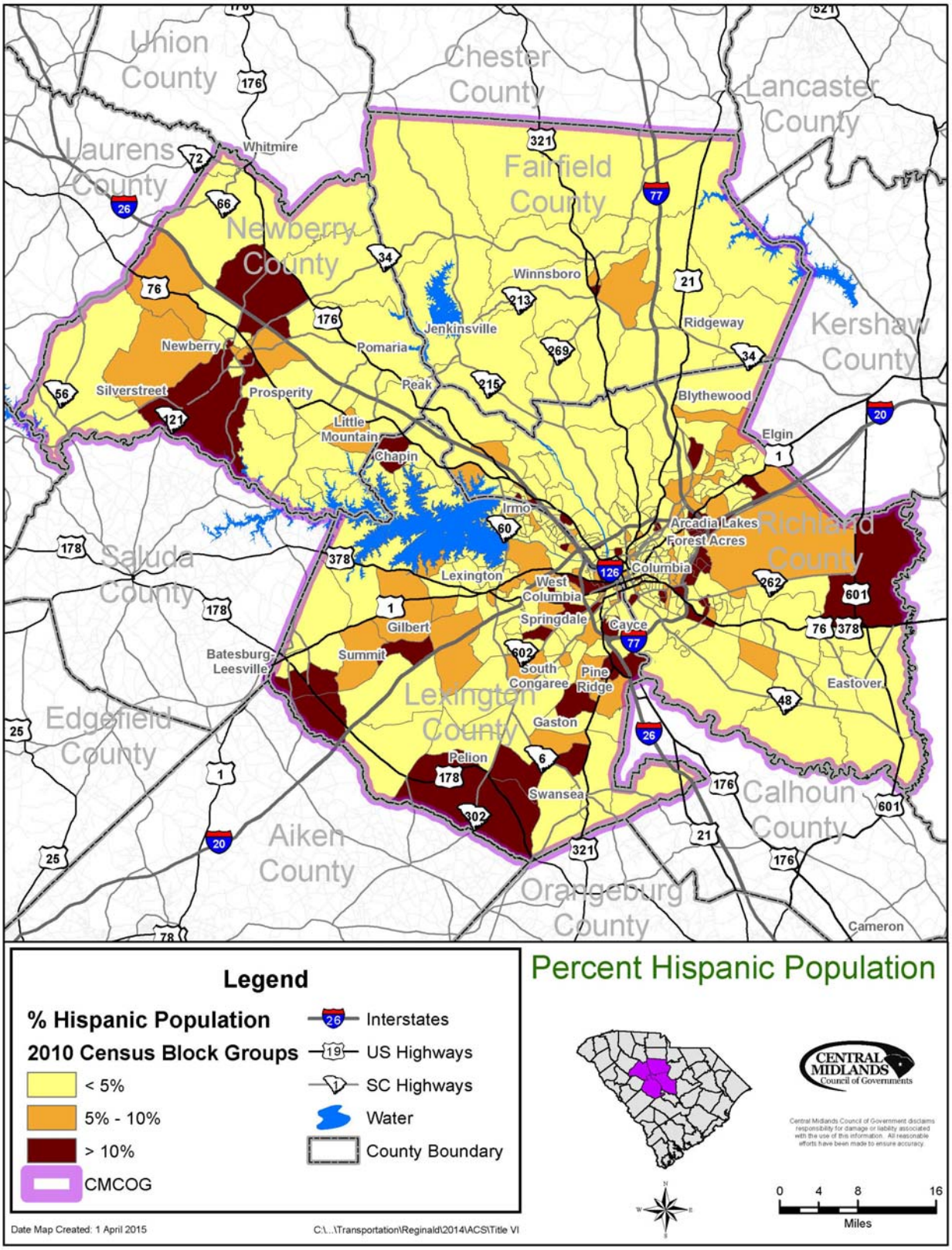
	COG Region	Richland County	Lexington County	Newberry County	Fairfield County
Population	717,386	389,708	266,575	37,514	23,589
Minority Population	285,568	205,674	51,095	14,309	14,490
% Minority Population	**40%**	**53%**	**19%**	**38%**	**61%**
Hispanic Population	36,932	18,931	14,867	2,727	407
% Hispanic Population	**5%**	**5%**	**6%**	**7%**	**2%**
Over 65 Population	83,533	39,709	34,005	6,121	3,698
% Over 65	**12%**	**10%**	**13%**	**16%**	**16%**
Households	271,278	143,874	103,742	14,254	9,408
Households below Poverty	40,498	23,270	12,644	2,441	2,143
% Households below Poverty	**15%**	**16%**	**12%**	**17%**	**23%**

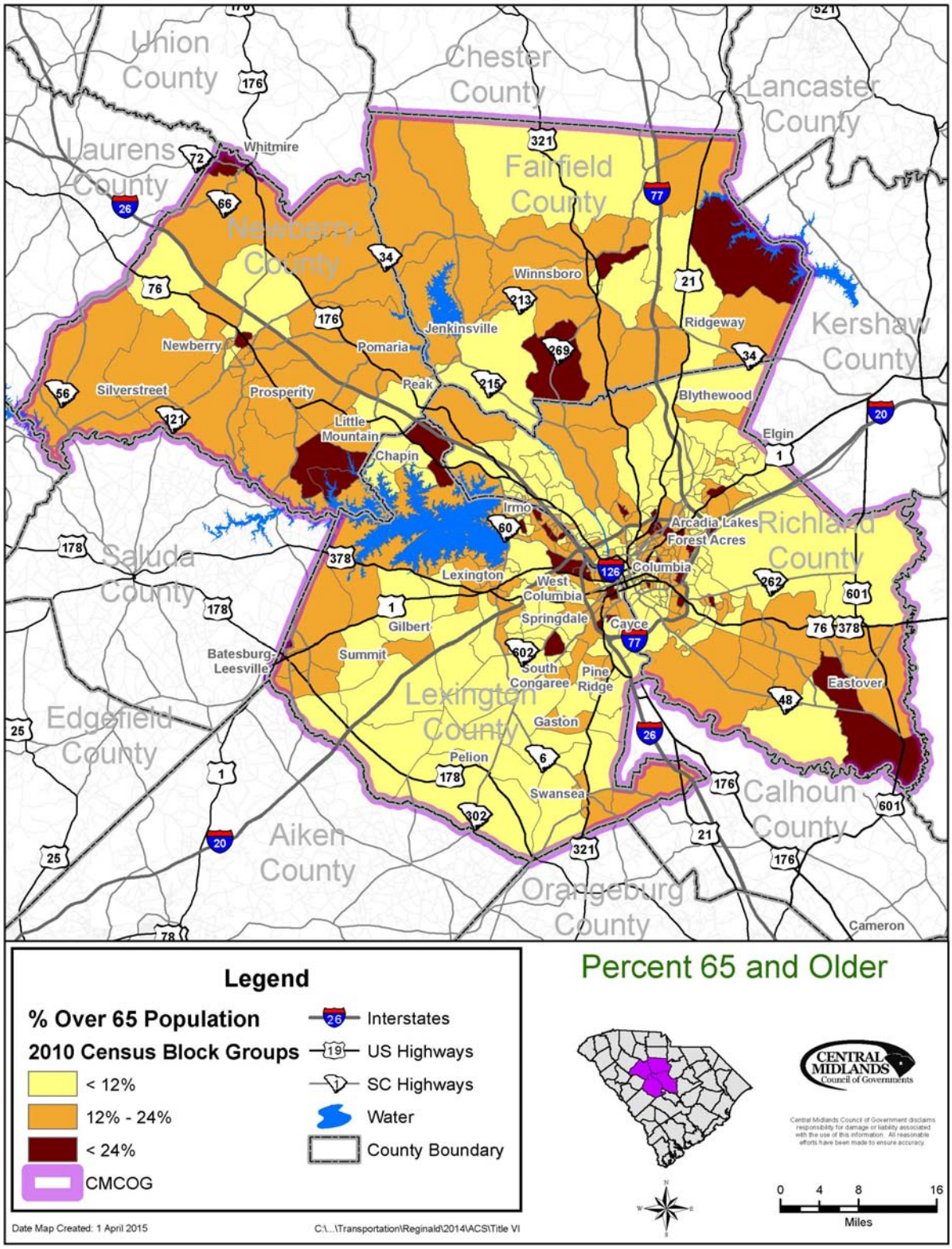
Note: Military populations are not considered to be exposed to the same level of risk for environmental justice concerns as civilian populations.

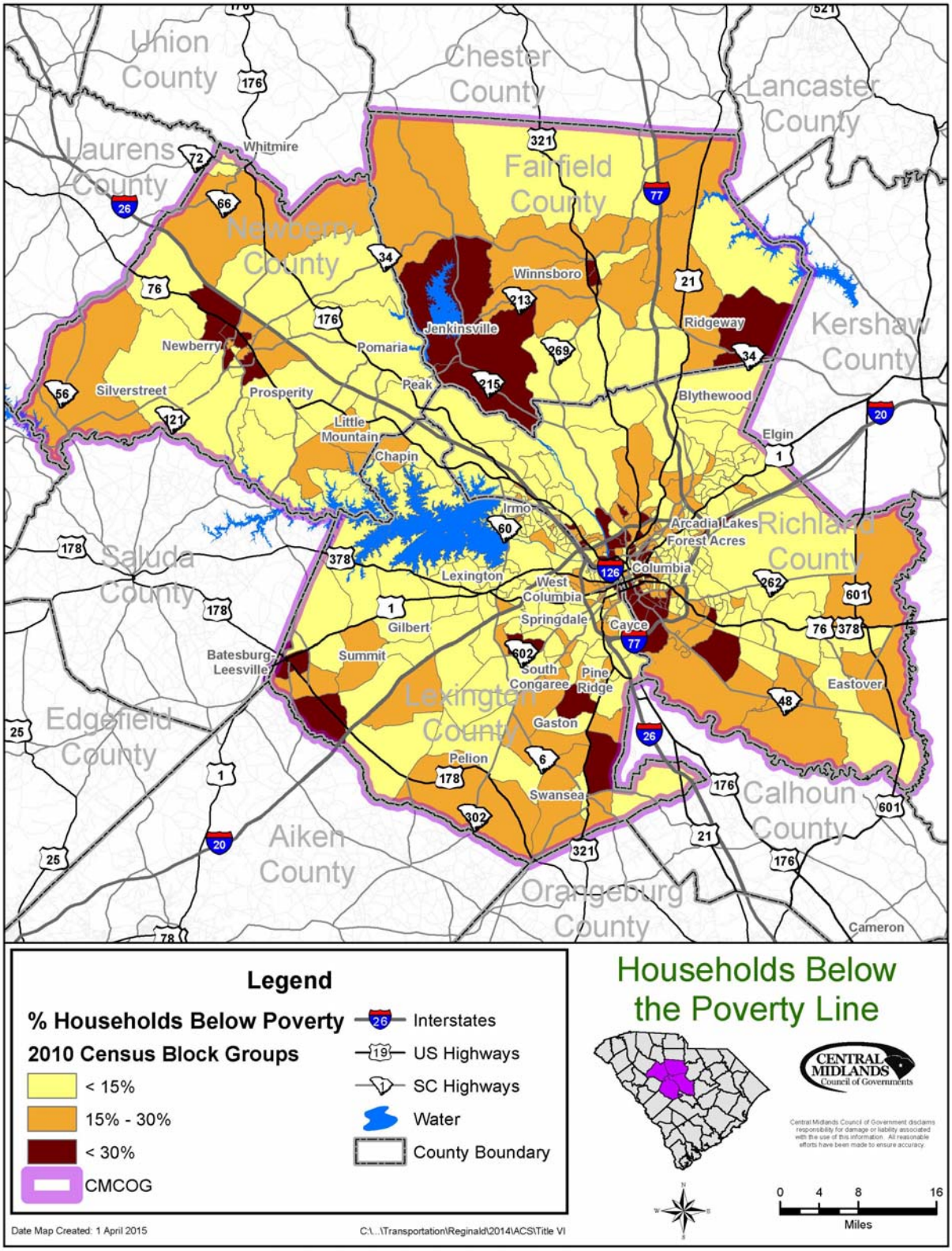
According to these regional totals, minority populations make up 40% of the total population of the CMCOG region with the largest share (approximately 72%) residing in Richland County. The Hispanic population represents 5% of the total population with the largest share (approximately 51%) residing in Richland County. In addition the 65 and older population represents 12% of the total population with the largest share (approximately 48%) residing in Richland County. As well, the poverty population makes up 15% of the total population with the largest share (approximately 57%) residing in Richland County.

The following maps illustrate the areas of the region where the percentages of minority, Hispanic, and 65 and older populations exceed the regional percentage thresholds as defined in the Environmental Justice Profile on Page 57. The families below the poverty line are also illustrated. The last map illustrates the highest concentrations of all four of these variables combined which represent areas most vulnerable to environmental justice issues.


Union County
Chester County
Lancaster County
Laurens County
Whitmire
Fairfield County
Newberry County
Winnsboro
Jenkinsville
Ridgeway
Kershaw County
Newberry
Pomaria
Silverstreet
Prosperity
Peak
Blythewood
Little Mountain
Chapin
Elgin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Saluda County
Lexington
Columbia
West Columbia
Springdale
Cayce
Gilbert
Summit
Batesburg Leesville
South Congaree
Pine Ridge
Eastover
Lexington County
Gaston
Edgefield County
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Cameron
Legend
% Minority Population
2010 Census Block Groups
< 40%
40% - 80%
> 80%
CMCOG
Interstates
US Highways
SC Highways
Water
County Boundary
Percent Minority Population
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 4 8 16
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI

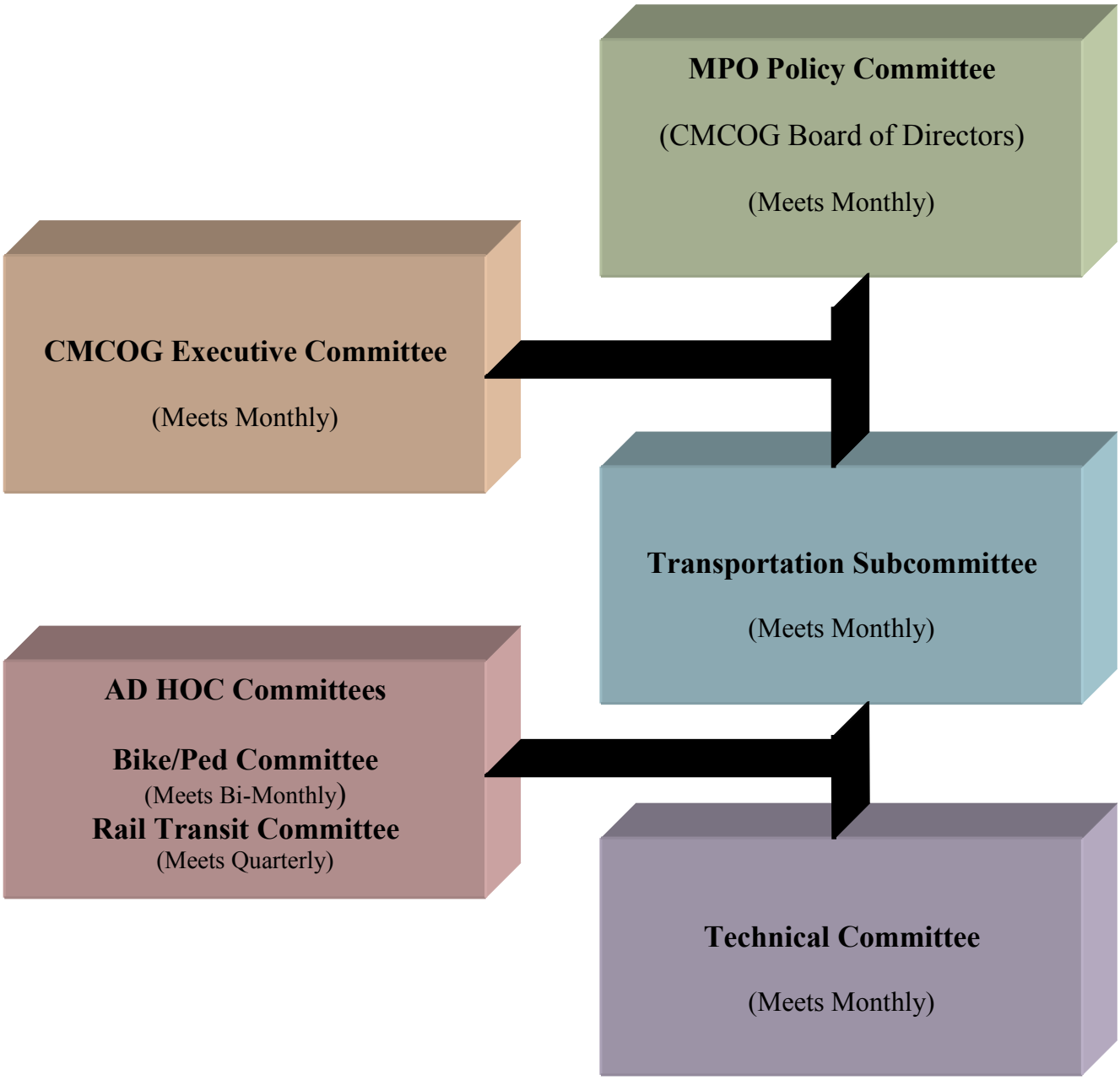

Union County
Chester County
Lancaster County
Laurens County
Fairfield County
Newberry County
Kershaw County
Saluda County
Richland County
Lexington County
Edgefield County
Aiken County
Calhoun County
Orangeburg County
Whitmire
Winnsboro
Jenkinsville
Ridgeway
Newberry
Pomaria
Silverstreet
Prosperity
Peak
Blythewood
Little Mountain
Chapin
Elgin
Irmo
Arcadia Lakes
Forest Acres
Columbia
Lexington
West Columbia
Springdale
Cayce
Gilbert
Summit
Batesburg-Leesville
South Congaree
Pine Ridge
Eastover
Gaston
Pelion
Swansea
Cameron
Legend
% Hispanic Population
2010 Census Block Groups
< 5%
5% - 10%
> 10%
CMCOG
Interstates
US Highways
SC Highways
Water
County Boundary
Percent Hispanic Population
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 4 8 16
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI


Union County
Chester County
Lancaster County
Laurens County
Fairfield County
Newberry County
Kershaw County
Saluda County
Richland County
Lexington County
Edgefield County
Aiken County
Calhoun County
Orangeburg County
Whitmire
Winnsboro
Jenkinsville
Ridgeway
Newberry
Pomaria
Silverstreet
Prosperity
Peak
Blythewood
Little Mountain
Chapin
Elgin
Irmo
Arcadia Lakes
Forest Acres
Columbia
Lexington
West Columbia
Springdale
Cayce
Gilbert
Summit
Batesburg-Leesville
South Congaree
Pine Ridge
Eastover
Gaston
Pelion
Swansea
Cameron
Legend
% Over 65 Population
2010 Census Block Groups
< 12%
12% - 24%
< 24%
CMCOG
Interstates
US Highways
SC Highways
Water
County Boundary
Percent 65 and Older
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 4 8 16
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI


Union County
Chester County
Lancaster County
Laurens County
Whitmire
Fairfield County
Newberry County
Winnsboro
Jenkinsville
Ridgeway
Kershaw County
Newberry
Pomaria
Silverstreet
Prosperity
Peak
Blythewood
Little Mountain
Chapin
Elgin
Irmo
Arcadia Lakes
Forest Acres
Richland County
Saluda County
Lexington
Columbia
West Columbia
Springdale
Cayce
Gilbert
Summit
Batesburg-Leesville
South Congaree
Pine Ridge
Eastover
Lexington County
Edgefield County
Gaston
Pelion
Swansea
Calhoun County
Aiken County
Orangeburg County
Cameron
Legend
% Households Below Poverty
2010 Census Block Groups
< 15%
15% - 30%
< 30%
CMCOG
Interstates
US Highways
SC Highways
Water
County Boundary
Households Below the Poverty Line
Central Midlands Council of Government disclaims responsibility for damage or liability associated with the use of this information. All reasonable efforts have been made to ensure accuracy.
0 4 8 16
Miles
Date Map Created: 1 April 2015
C:\...\Transportation\Reginald\2014\ACS\Title VI

APPENDIX 9

MPO Transportation Planning Process



Please be advised that all committees, except the Executive Committee, are open and available for public comment.

APPENDIX 10

COATS MPO Policy Committee (CMCOG Board of Directors) Members

Title	First Name	Last Name	Jurisdiction	Seat	Race	Sex
Mrs.	Vina	Abrams		Citizen	Black	Female
Mr.	Dennis	Arledge	Kershaw County Council	Elected	White	Male
Mr.	Michael	Bailey		Citizen	Black	Male
Rep.	Jimmy C.	Bales	Richland Co. Leg. Del.	Elected	White	Male
Ms.	Connie	Breeden		Citizen	Black	Female
Councilman	Larry	Brigham	Lexington County Council	Elected	White	Male
Mr.	David	Brown		Citizen	White	Male
Councilman	John	Carrigg	Lexington County Council	Citizen	White	Male
Mr.	Alfred	Comfort	Richland County	Citizen	Black	Male
Ms.	Ellen	Cooper		Citizen	White	Female
Mr.	Kendall	Corley		Citizen	Black	Male
Councilman	Todd	Cullum	Lexington County Council	Elected	White	Male
Mr.	Smokey	Davis	Lexington County Council	Citizen	White	Male
Councilman	Sam	Davis	Columbia City Council	Elected	Black	Male
Mr.	Pedro	De Abreu	Richland County	Citizen	Hispanic	Male
Councilwoman	Joyce	Dickerson	Richland County Council	Elected	Black	Female
Councilwoman	Julie Ann	Dixon	Richland County Council	Elected	Black	Female
Rep.	MaryGail	Douglas	Fairfield County Legislative Delegation	Elected	White	Female
Mr.	Clabie	Edmond		Citizen	Black	Male
Mr.	Shawn	Epps		Citizen	White	Male
Mayor	Roger A.	Gaddy	Town of Winnsboro	Elected	White	Male
Councilman	Zebbie	Goudelock	City of Newberry	Elected	Black	Male
Mr.	John	Hardee		Citizen	White	Male
Councilman	Les	Hipp	Newberry County Council	Elected	White	Male
Councilman	Norman	Jackson	Richland County Council	Elected	Black	Male
Mr.	Wilber Lee	Jeffcoat		Citizen	Black	Male
Councilman	Johnny	Jeffcoat	Lexington County Council	Elected	White	Male
Councilman	Paul	Livingston	Richland County Council	Elected	Black	Male
Mayor	Steve	MacDougall	Town of Lexington	Elected	White	Male
Mr.	Earl E.	McLeod		Citizen	White	Male
Rep.	Walton J.	McLeod	Newberry Co. Leg. Del.	Elected	White	Male
Mr.	Joe	Mergo, III	Lexington County Administrator	Citizen	White	Male
	Tony	Mizzell		Citizen	White	Male
Councilman	Brian	Newman	Columbia City Council	Elected	Black	Male
Ms.	Cathy	Novinger	Palmetto Agri Business Council	Citizen	White	Female
Councilman	Todd	O'Dell	Batesburg-Leesville Town Council	Elected	White	Male
Mayor	Joe	Owens	City of West Columbia	Elected	White	Male
Mayor	Elise	Partin	City of Cayce	Elected	White	Female
Rep.	Rick	Quinn	Lexington County Legislative Delegation	Elected	White	Male
Councilman	Juston	Ricard	Town of Springdale	Elected	White	Male
Councilman	Marion	Robinson	Fairfield County Council	Elected	White	Male
Councilwoman	Carolyn	Robinson	Fairfield County Council	Elected	White	Female
Councilman	Torrey	Rush	Richland County Council	Elected	Black	Male
Councilwoman	Debbie	Summers	Lexington County Council	Elected	White	Female
Councilman	William	Waldrop	Newberry County Council	Elected	White	Male
Councilman	Kelvin	Washington	Richland County Council	Elected	Black	Male
Mr.	Mark	Williams	Forest Acres City Administrator	Elected	White	Male
Ms.	Teresa	Wilson	City of Columbia	Elected	Black	Female
Councilman	Phillip	Yarborough	Lexington County Council	Elected	White	Male
Councilman	Paul	Younginer	Irmo Town Council	Elected	White	Male