

Greenville Transit Authority

Title VI Program

December 2016

Chapter I: Introduction and Background

The City of Greenville d.b.a. Greenlink, hereafter referred to as Greenlink, as a Contractor for Greenville Transit Authority, hereafter referred to as GTA, is responding to applicable chapters of Circular FTA C 4702.1B, dated October 1, 2012.

Chapter II: Program Overview

GTA/Greenlink makes every effort to ensure that transportation services are provided at a consistent level and quality to everyone without regard to race, color, or national origin. Through its planning process, GTA/Greenlink has reviewed social and economic effects of programs and activities on minority populations and low-income populations and has targeted service to the extent possible to these areas.

GTA/Greenlink has made all possible efforts to prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations, particularly in service to disabled riders. Through its Title VI Plan and signed Assurances, GTA will abide by DOT Order 5610.2, Environmental Justice, and DOT Limited English Proficiency, 70 FR 74087. All third party contractors will also be required to comply with the guidance of the circulars. Further, GTA and its third party contractors at any tier of a project will provide services without regard to race, color, creed, national origin, sex or age, and will prohibit discrimination in employment or business opportunity.

Chapter III: Requirements and Guidelines

Requirement to Provide Title VI Assurances

GTA/Greenlink annually submits certifications and assurances to FTA as a part of its application process. Further, GTA/Greenlink requires compliance with the assurances and certifications from each of its third-party contractors. GTA/Greenlink has historically submitted all required annual certifications and assurances to the Federal Transit Administration.

Requirement to Prepare and Submit a Title VI Program

GTA/Greenlink has prepared a Title VI program that meets the requirements of FTA C 4702.1B. This document and its attachment represent GTA/Greenlink's Title VI program. The Title VI notice to the public can be found in Attachment E. This information is posted on the GTA/Greenlink website and in the Greenlink Terminal.

Requirement to Notify Beneficiaries of Protection Under Title VI

GTA/Greenlink has prepared a statement of procedures to notify beneficiaries of the GTA/Greenlink's Title VI responsibilities. This statement is posted on the GTA/Greenlink's web-site and displayed at Greenlink's downtown transfer station and in all Greenlink buses in both English and Spanish.

Requirement to Develop Title VI Complaint Procedures and Complaint Form

GTA/Greenlink has developed a complaint procedure in compliance with 49 CFR Section 21.9(b) that can be found in Attachment A. A copy of the required complaint form can be found in the Attachment B.

Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

No Title VI investigations, complaints, or lawsuits have been filed with GTA/Greenlink since the time of the last submission.

Promoting Inclusive Public Participation

GTA/Greenlink encourages public participation, a copy of this plan can be found in Attachment C.

Requirement to Provide Meaningful Access to LEP Persons

GTA/Greenlink has prepared a Limited English Proficiency plan that is located in Attachment F.

Minority Representation on Planning and Advisory Bodies

GTA/Greenlink does not currently have a planning or advisory committee.

Providing Assistance to and Monitoring Subrecipients

GTA/Greenlink does not currently have a subrecipient.

Determination of Site or Location of Facilities

GTA/Greenlink has not constructed any facilities at this time.

Requirement to Provide Additional Information Upon Request

GTA/Greenlink acknowledges that at the discretion of FTA, information other than that contained in Circular FTA 4701.1B may be requested in writing from recipients or sub-recipients to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

Chapter IV: Requirements and Guidelines for Fixed Route Transit Providers

Requirement to Prepare and Submit a Title VI Program

GTA/Greenlink has prepared a Title VI program that meets the requirements of FTA C 4702.1B. This document and its attachment meet represent GTA/Greenlink's Title VI program. The Title VI notice to the public can be found in Attachment E. This information is posted on the GTA/Greenlink website and in the Greenlink Terminal.

Requirement to Set System-Wide Service Standards and Policies

GTA/Greenlink has developed the following service standards:

Vehicle Load

The load factor policy for GTA/Greenlink is defined as follows: a load factor exceeding 1:1.5 recorded for a 35' vehicle or a load factor exceeding 1:1.1 recorded for a cutaway style vehicle at any point along the routes will be the basis for increasing service.

Vehicle Headway

Service on each of the routes operated by GTA/Greenlink varies in response to the load factor policy described above or in response to other factors warranting an adjustment in service. GTA/Greenlink operates 10 fixed routes with 60-minute headway and one route with a 30-minute headway.

On-Time Performance

Currently, on-time performance is monitored visually through supervisory ride checks and observations at the terminal or checkpoints. Currently a vehicle is considered on time if it departs no more than 5 minutes late from the terminal. Greenlink is currently in the process of implementing GPS tracking devices (CAD/AVL) on the entire fixed route fleet of Greenlink buses and have already done so for Greenlink's demand response vehicles.

Service Availability

GTA/Greenlink sets its schedules so as to maximize convenience to riders and thereby increase ridership. Schedules are reviewed through periodic evaluations of the routes and by staff members' serving on various committees and meeting with members of the general public (including low income, minority, disabled and elderly persons).

Currently the system provides service routes to public agencies, post-secondary educational institutions, shopping areas, and local hospitals. As to on-demand response for ADA service, the area within three-quarters of one mile of a route is considered to be within the route's service area.

Vehicle assignment

Twenty-eight buses are currently available to provide service on GTA's routes with 11 fixed routes. No more than seventeen buses are used during peak service. The buses are similarly equipped and are assigned to routes based on ridership. Five buses are available to provide on-demand service to customers certified as eligible for ADA service within the Greenlink service area. Low-floor buses are deployed on all routes with 60 minute headways. Assignments are made starting with the newest equipment available, older equipment is used as spares and when a newer vehicle is taken out of service for maintenance.

Transit Amenities

At the current time, GTA/Greenlink offers more than 65 shelters and more than 500 bus stop signs at various locations throughout the service area. There is a transfer facility with restrooms and an information booth. Information materials (i.e., schedules and system maps) are provided to the public at no cost. Information and route brochures are made available to the general public upon request.

Requirement to Collect and Report Demographic Data

Although GTA/Greenlink is in a UZA with a population greater than 200,000 people, GTA/Greenlink does not operate 50 or more vehicles in peak service. For this reason, this section is not required.

Requirement to Monitor Transit Service

Although GTA/Greenlink is in a UZA with a population greater than 200,000 people, GTA/Greenlink does not operate 50 or more vehicles in peak service. For this reason, this section is not required.

Requirement to Evaluate Service and Fare Changes

Although GTA/Greenlink is in a UZA with a population greater than 200,000 people, GTA/Greenlink does not operate 50 or more vehicles in peak service. For this reason, this section is not required.

Chapter V: Requirements for States

GTA/Greenlink is a transit authority, for this reason this section is not required.

Chapter VI: Requirements for MPOs

GTA/Greenlink is a transit authority, for this reason this section is not required.

Chapter VII: Effecting Compliance with DOT Title VI Regulations

GTA/Greenlink has cleared all Triennial issues from 2015 and has not been notified of any further compliance issues to date.

Chapter VIII: Compliance Reviews

GTA/Greenlink resolved all findings during its last triennial review (2015).

Chapter IX: Complaints

GTA/Greenlink has not had any Title VI complaints reported to date.

Attachment A: Complaint Procedure

Responsibilities

All employees of Greenlink Transit shall follow the intent of these guidelines in a manner that reflects agency policy. Supervisors and managers receiving information regarding violations shall determine if there is any basis for the allegation and shall proceed with creating prompt resolutions. Resolution at the lowest possible level is encouraged. The Public Transportation Director is responsible for ensuring that all complaining parties are made aware of their right to appeal to the EEO Office if they are dissatisfied with the outcome of their complaint. The Public Transportation Director shall forward all appeals to the EEO Office no later than 3 working days after their receipt.

Management Responsibility

Each Transit Supervisor and Manager shall:

- A. Ensure that there are no barriers to service or accommodation that would prevent transit usage.
- B. Train subordinates as to what constitutes discrimination and barriers to access.
- C. Take prompt and appropriate action to avoid incidence of Title VI-related discrimination.
- D. Notify the Public Transportation Director in writing of the circumstances surrounding any reported allegations of discrimination no later than 3 working days after receiving a claim of discrimination.

Investigation of Complaints and Appeal Process

Various methods of resolution exist. Any individual who feels that they have been discriminated against based on race, color, or national origin should first speak to the Public Transportation Director to see if the matter can be resolved. The Public Transportation Director can be contacted at the following location:

Greenlink
100 W. McBee Avenue
Greenville, SC 29601
Phone: 864.467.2700

The Public Transportation Director will investigate the complaint and make a determination on its merits. Formal investigation of the complaint will be confidential and will include, but not be limited to, details of the specific incident, frequency and dates of occurrences, and names of any witnesses. Complaining parties will be notified of the determined resolution in writing.

If the complainant does not feel that their concerns have been resolved at the level of the Public Transportation Director, then they may file a formal written appeal with the City of Greenville Human Resource Department within 30 days from the date of the last alleged discriminatory act. The complainant is required to provide sufficient information to substantiate discriminatory allegations, and a copy of the Public Transportation Director's written response must be attached to the letter of appeal to the Human Resource Department.

The HR Public Transportation Director can be contacted at the following location:

City of Greenville HR Department
206 S. Main St.
Greenville, SC 29601

A statement of reasons why the applicant believes the denial of accommodation access to public transportation was inappropriate is recommended. The City of Greenville HR Public Transportation Director will set a mutually agreed-upon time and place for the review process with the applicant and/or representatives within 30 days of the request. The applicant may submit documents or other information to be included with the record and considered in the review process.

In relation to a formal investigation, all managers, employees, vendors, and contractors connected to GTA/Greenlink will be required: 1) to fully cooperate in the investigation process, 2) not to withhold any information (written, e-mailed, or oral) connected to an investigation, 3) to make themselves available for questioning within 5 working days of a request for a meeting from the EEO Office, and 4) to provide truthful statements to the internal EEO Office.

The charging party will generally be issued a letter of findings and recommendations from the HR Office within 30 working days after filing a complaint. If additional time is needed to investigate a complaint, then all parties will be notified by the HR Office.

Disposition of Complaints

Substantiated Complaints: If the complaint is substantiated, this antidiscrimination policy and procedure will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to the agency disciplinary procedures.

Unsubstantiated Complaints: If there is insufficient evidence to either prove or disprove allegation(s), both parties to the complaint will be informed of the reason(s) for this disposition.

Unfounded Complaint: If it is determined that an act reported pursuant to this policy/procedure did not in fact occur; a finding of unfounded shall be made.

Exonerated Complaints: If it is determined that an act reported pursuant to this policy/procedure did in fact occur, but was lawful and proper within the guidelines established herein, a finding of exonerated shall be made.

An appeal to the City of Greenville Human Resources Office will constitute as the last level of internal appeals within GTA/Greenlink.

Prohibition Against Retaliation

Complainants and witnesses are protected against any form of organizational, administrative or management retaliation due to/or in any part based on participation in a Title VI complaint, inquiry, mediation and/or investigation. No one may fire, demote, harass, deny services to or otherwise "retaliate" against an individual for filing a discrimination charge or being a witness in relation to such charges.

If individuals believe they are being subjected to retaliation, then they should notify the EEO Office, in writing, within 10 working days of the alleged retaliatory act. The written allegation must outline the details of the specific acts that the individual believes are being done in retaliation. The complainant will receive a written response in relation to their retaliation complaint within 30 working days.

Attachment B: Complaint Form



Title VI Complaint Form

Contact Information			
Name (First, Last):			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Complaint Information			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes", go to <i>Basis for Complaint</i> .			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Basis for Complaint			
I believe the discrimination I experienced was based on (circle all that apply):			
Race	Color	National Origin	
Date of the Alleged Discrimination (Month, Day, Year):			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the names and contact information of all the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please use the bottom or back of this form:			
Other Information			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Have you filed a complaint with any Federal, State, or local agency, or with any Federal or State court?			
Yes		No	
If yes, circle all that apply and list the name of the agency/court:			
Federal Agency:		Federal Court:	
State Agency:		State Court:	
Local Agency:		Other:	

Please provide information for a contact person at the agency/court where the complaint was filed:	
Name:	Title:
Agency:	Address:
Telephone:	
Agency You Are Complaining Against	
Name of the agency complaint is against:	
Contact person:	Title:
Telephone Number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Greenlink
 Title VI Coordinator
 100 W. McBee Ave.
 Greenville, SC 29601

Attachment C: Public Participation Plan

The purpose of this plan is to outline procedures conducting public hearings on changes made by GTA/Greenlink to the fare structure or service levels.

As a designated recipient of Federal Transit Administration funding, GTA/Greenlink is required to perform public hearings. A written policy and procedures for the policy, regarding the hearings is thus necessary.

The public hearing is designed to get an understanding of the public's sentiment regarding a change in the fare structure of the system or changes to the services provided by the Authority.

- A. GTA/Greenlink is to allow for public input into the decision-making regarding the regulation of fares and changes to the services provided by GTA/Greenlink, in accordance with FTA regulations requiring the public hearings.
- B. Public hearings will be of public record, open to all citizens of the communities where the transit system has its operations, the hearings will be held in ADA accessible facilities that are accessible by means of public transportation as well.
- C. GTA/Greenlink will agree to conduct public hearings in a manner congruent with federal regulations FTA Master Agreement and U.S.C. Section 5307.

All public hearings must be recorded and transcripts are to be made available to the public in a timely fashion.

There will be a period of two weeks between the public notice of the public hearing and the actual hearing date.

The public notice must be circulated to the area's media outlets (newspaper, radio, and television, etc.) and must include the correct date, time, location, and purpose of the hearing.

The Authority will make all efforts to include minority and limited English proficient (LEP) populations in all such meetings by:

- A. Posting meeting notices on transit vehicles, at bus shelters, and in the transfer terminal.
- B. Posting meeting notices on GTA/Greenlink's website.
- C. Disseminating meeting notices to minority and LEP interest groups.
- D. Including translators in public events (as resources are available).

The location of the hearing is to be in an ADA accessible venue.

The location of the hearing is to be accessible via public transportation.

The hearing may be attended by individual citizens or by individuals who represent a group of citizens, with respect to the specific item that is the purpose of the hearing.

The hearing is designed to get an understanding of the public's sentiment regarding a change in the fare structure of the system or the change to a service provided by GTA/Greenlink. (i.e., a reduction of an entire route would require a public hearing).

There will be a GTA/Greenlink staff member presiding over the public hearing. The Presiding Officer, or Hearing Officer, will be in charge of:

- A. Securing of a venue for the public hearing;
- B. Notifying the media outlets of the hearing;
- C. The recording of the hearing and the availability of the minutes of the hearing to the general public;
- D. Pre-hearing materials, including meeting announcements, agendas, displays that detail items that are to be discussed at the hearing, and any mailings or publicity materials that are necessary for the hearing will be furnished by the Presiding Officer;
- E. And any other activities associated with the hearing that is not mentioned in the above duties.

A public hearing will be called when the GTA/Greenlink staff has studied and made recommendations relating to a change in service or fare structure.

The public hearing will consist of a:

- A. Period of time to allow the GTA/Greenlink staff members to explain the nature of the changes in service, detailing the reasoning behind the decisions that have been made-up until the first public hearing;
- B. Period of time to allow members of the general public to express their views on the topic of the hearing.
- C. GTA/Greenlink staff will take the views expressed by the citizens who spoke at the public hearing into consideration and make its final recommendations to GTA/Greenlink for a proper discussion and vote on the changes to the transit service.

Additional hearings may be convened if it is determined that there is a need to do so.

Attachment D: Board of Public Transportation Directors Title VI Approval

Attachment E: Title VI Notice to the Public

GTA/Greenlink gives notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. 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 participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which GTA/Greenlink receives Federal financial assistance.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d)

Greenville Transit Authority/Greenlink is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

It is Greenlink’s objective to:

- *Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;*
- *Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;*
- *Promote the full and fair participation of all affected populations in transportation decision making;*
- *Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;*
- *Ensure meaningful access to programs and activities by persons with limited English proficiency.*

Greenlink staff share the responsibility for carrying out Greenlink’s commitment to Title VI. The Title VI staff is responsible for the day-to-day operation of the program and the Customer Service staff receives and investigates Title VI complaints that come through the complaint procedures process.

If you believe you have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin, you may contact Greenlink’s Title VI Coordinator at (864) 298-2753 or ajohn@greenville.gov.

GTA/Greenlink, as a condition for receiving financial assistance from the Federal Transportation Administration, ensures that:

- A. 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.
- B. GTA/Greenlink will compile, maintain, and timely submit Title VI information required by the Federal Transit Administration, copies of which will be available to the general public.

- C. GTA/Greenlink, makes it known to the public that any person or persons alleging discrimination on the basis of race, color, age, gender, disability, or national origin as regards the provision of transportation services and transit-related benefits may file a complaint with GTA/Greenlink, The City of Greenville Human Resource Department, or the Federal Transit Administration.

Any member of the general public who feels that his or her Title VI rights have been violated in any manner may first speak informally with the Public Transportation Director, GTA/Greenlink, 100 W. McBee Avenue Greenville, SC 29602, phone 864-467-2700 order to see if the matter can be resolved. The Public Transportation Director will investigate the complaint and make a determination on its merits. Complaining parties will receive written notification of the determined resolution.

Any complainant who does not feel that his or her concerns have been resolved at the level of the Public Transportation Director may then file a formal written appeal at the City's Human Resource Office, 206 S. Main St. Greenville, SC 29601, within 30 days from the date of the last alleged discriminatory act.

The City of Greenville Human Resource Public Transportation Director will set a mutually agreed-upon time and place for the review process with the applicant and/or representatives within 30 working days of the request. The complainant may submit documents or other information to be included with the record and considered in the review process. The complainant will generally be issued a letter of findings and recommendations from the Human Resource Department within 30 working days after filing a complaint. If additional time is needed to investigate a complaint, then all parties will be notified by the Human Resource Department. Individuals may withdraw a formal grievance and decide to seek mediation or an informal resolution at any point in the complaint process.

Procedures to correct any deficiencies found through the complaint will be initiated within a 30-working day period. If no deficiencies are found to exist as a result of the complaint, a written response will be sent to the complainant within a 15-working day period, detailing the investigation and the results of that investigation. If the complainant is not satisfied with the results of the investigation, they may further appeal their complaint to the offices of the Federal Transit Administration, Regional Civil Rights Office, 230 Peachtree St., NW, Suite 800, Atlanta, Ga. 30303

- D. GTA/Greenlink, will notify the general public of its Title VI responsibilities through posting of this statement at the Greenlink Administrative headquarters and on the Greenlink web page. The statement will be posted to meet requirements of LEP individuals.

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

Gary A Shepard
Public Transportation Director

Date

Attachment F: Limited English Proficiency Plan

The Need for an LEP Plan

Individuals with a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing public services and benefits—including public transit services.

Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 signed on August 11, 2000, are the federal legislation necessitating LEP plans from public agencies receiving federal funds.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 that receives Federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, “Improving Access to Services with Limited English Proficiency,” requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. The Executive Order 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, private and non-profit entities, and sub-recipients such as public transit agencies.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on October 1, 2012. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

GTA/Greenlink’s LEP Plan

The Greenville Transit Authority operated under contract by the City of Greenville d.b.a. Greenlink (GTA/Greenlink) is the regional transit authority for Greenville County, South Carolina. GTA/Greenlink is a designated direct recipient of FTA funding and is required to develop and routinely update its LEP plan as part of its Title VI Program.

GTA/Greenlink’s LEP plan is a critical component to best serving the transit needs of the diverse communities comprising its service area. Providing language assistance in a competent and effective manner will help ensure that GTA/Greenlink’s services are safe, reliable, convenient, and accessible to LEP persons in the community. Ideally, these efforts will attract additional LEP riders to GTA/Greenlink’s services.

Elements of an Effective LEP Plan

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP notes that effective implementation plans typically include the following five elements:

1. Includes the results of the Four Factor Analysis and the LEP Population served.
2. How GTA/Greenlink provides language assistance services.
3. How GTA/Greenlink provides notice to LEP persons about language assistance services.
4. How GTA/Greenlink monitors, evaluates and updates the LEP Plan.
5. How GTA/Greenlink trains employees on LEP assistance.

The “Four Factor Analysis”

The DOT guidance outlines “four factors” recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP services. Through conducting the “Four Factor Analysis,” GTA/Greenlink is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents. The four factors are as follows:

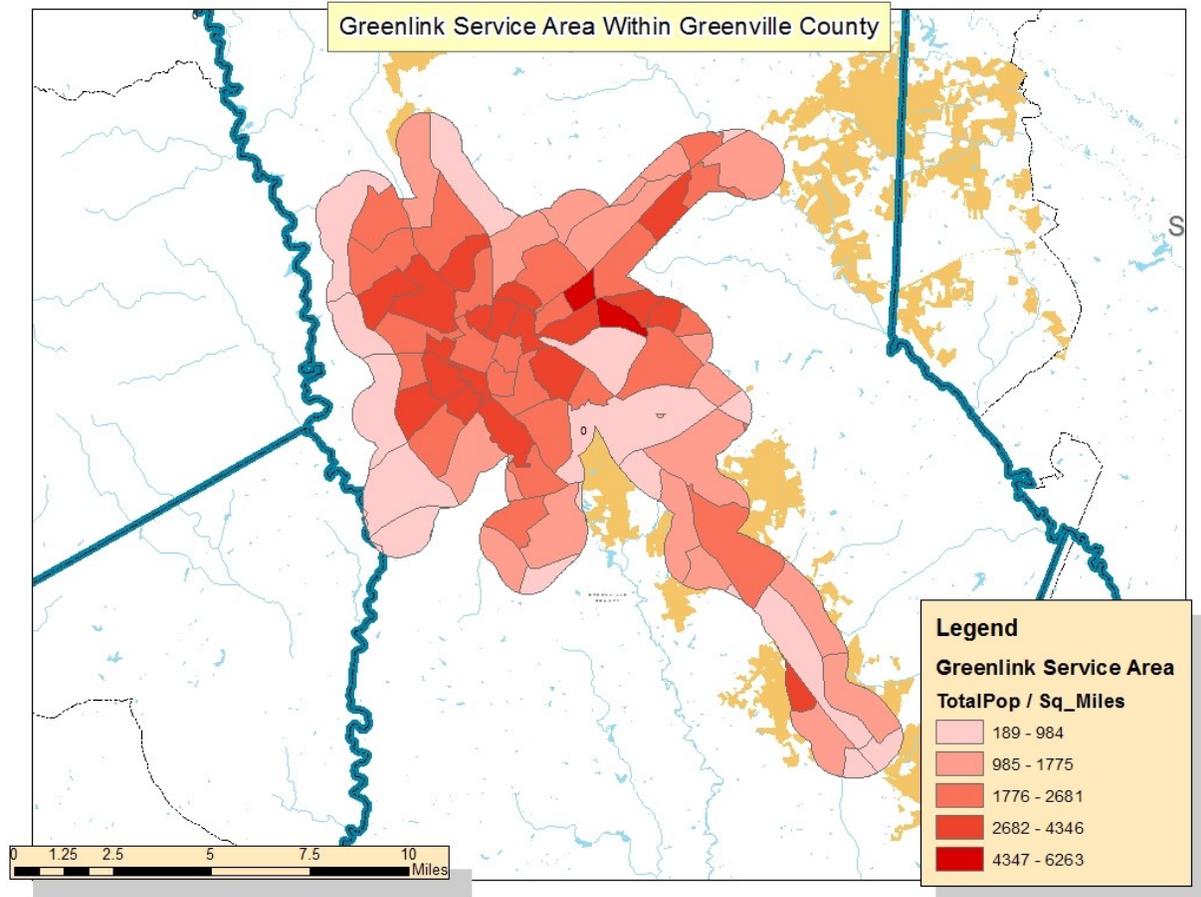
1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the recipient and the overall cost.

GTA/Greenlink’s “Four Factor Analysis”

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

Analysis of 2010-2014 American Community Survey (ACS) data was conducted to: estimate potential LEP populations in Greenville County, then estimate potential LEP populations within the GTA/Greenlink service area, and lastly checking these estimates against the top ten non-English languages spoken at home for the population 5 and over within Greenville County. For planning purposes, the current GTA/Greenlink service area covers 99.11 square miles within Greenville County, South Carolina. See Figure 1 for a map of GTA/Greenlink’s service area.

Figure 1- GTA/Greenlink Service Area



Examination of 2010-2014 ACS, “Language Spoken at Home: Population 5 Years and Over,” by geographic place determined that there are 3 non-English language groups spoken at home by over 1,000 persons in Greenville County. The largest language group, Spanish, is spoken by approximately 32,794 people in Greenville County varying in levels of English proficiency from “very well” to “not at all”. This is followed by Other Indo-European (7,334) and Asian/Pacific Island (6,057) language persons.

For additional analysis of populations five and older by language spoken at home and ability to speak English, see Table 1.

Table 1: Language Spoken at Home and Ability to Speak English in Greenville County

POPULATION 5 YEARS AND OVER BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH	Greenville County, South Carolina	
	Number	Percent
Population 5 years and over	436,055	100.0
Speak only English	387,722	88.9
Speak a language other than English	48,333	11.1

Spanish	32,794	100.0
Speak English "very well"	17,085	52.1
Speak English "well"	7,201	22.0
Speak English "not well"	6,603	20.1
Speak English "not at all"	1,905	5.8
Other Indo-European languages	7,334	100.0
Speak English "very well"	5,561	75.8
Speak English "well"	1,297	17.7
Speak English "not well"	422	5.8
Speak English "not at all"	54	0.7
Asian and Pacific Island languages	6,057	100.0
Speak English "very well"	3,670	60.6
Speak English "well"	1,525	25.2
Speak English "not well"	701	11.6
Speak English "not at all"	161	2.6
All other languages	2,148	100.0
Speak English "very well"	1,265	58.9
Speak English "well"	289	13.5
Speak English "not well"	327	15.2
Speak English "not at all"	267	12.4
ABILITY TO SPEAK ENGLISH		
Population 5 years and over	387,722	88.9
Speak a language other than English	48,333	11.1
5 to 17 years	10,275	21.3
18 to 64 years	35,158	72.7
65 years and over	2,900	6.0
Speak English less than "very well"	20,752	4.8
5 to 17 years	2,147	10.3
18 to 64 years	17,205	82.9
65 years and over	1,400	6.7

Source: U.S. Census Bureau, 2010-2014 American Community Survey (ACS) 5-Year Estimates; Greenville-Pickens Area Transportation Study (GPATS) 2017

Using FTA guidelines, the LEP population—the population that speaks English less than “very well”—was estimated by summing the Census responses for Speak English “well,” “not well,” and “not at all.” The data is categorized by the language groups spoken by respondents: “Spanish,” “Indo-European,” “Asian or Pacific Islander,” or “Other”.

To examine this, estimates were derived from 2010-2014 ACS data on “Ability to Speak English: Language Spoken at Home by Populations 5 Years and Over”. The majority of the LEP population within the GTA/Greenlink service area—approximately 16,878 of the 21,798 LEP non-English speaking persons—speaks Spanish. The remaining 4,920 non-English speaking persons presumably speak one or more of the Indo-European, Asian/Pacific Islander, or Other languages. People who speak Spanish at home represent 10.1% of Greenville County’s population 5 years and over. All other languages were spoken by less than 2.9% of the population in Greenville County.

See Table 2 for additional analysis of proficiency of English and non-English person within the current GTA/Greenlink service area.

Table 2: Language Spoken at Home in GTA/Greenlink Service Area

SPEAK A LANGUAGE OTHER THAN ENGLISH	Greenville County, South Carolina		
	Total		Percent
	Estimate	Margin of Error	Estimate
Population 5 years and over	168,527	+/-2,848	100%
Speak only English	146,730	+/-1,085	87.1%
Speak a language other than English	21,798	+/-6,824	12.9%
Spanish	16,878	+/-1,809	10.1%
5 to 17 years old	4,363	+/-617	2.6%
18 to 64 years old	11,884	+/-1,039	7.1%
65 years old and over	631	+/-159	0.4%
Other Indo-European languages	2,055	+/-363	1.2%
5 to 17 years old	246	+/-79	0.1%
18 to 64 years old	1,470	+/-207	0.9%
65 years old and over	339	+/-77	0.2%
Asian and Pacific Island languages	2,130	+/-436	1.2%
5 to 17 years old	175	+/-72	0.1%
18 to 64 years old	1,746	+/-271	1.0%
65 years old and over	209	+/-93	0.1%
Other languages	735	+/-319	0.5%
5 to 17 years old	93	+/-56	0.1%
18 to 64 years old	629	+/-245	0.4%
65 years old and over	13	+/-18	0.0%
CITIZENS 18 YEARS AND OVER			
All citizens 18 years old and over	139,462	+/-4,762	100%
Speak only English	122,541	+/-2,653	87.9%
Speak a language other than English	16,921	+/-2,109	12.1%
Spanish	12,515	+/-1,198	74%
Other languages	4,406	+/-911	26%

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates; Greenville-Pickens Area Transportation Study (GPATS) 2017

Lastly, analysis was needed to determine total languages spoken within each language group to help confirm, if any, LEP populations are within the GTA/Greenlink service area. Using 2010-2014 ACS data on “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over”, the following ten languages are the most spoken at home in Greenville County. This analysis determined only one language, “Spanish or Spanish Creole”, surpasses the FTA threshold for persons who speak English less than “very well” (i.e. 5% or 1,000 people, whichever is less). An estimated 15,709 Spanish-speaking persons speak English less than “very well”. For additional analysis, see Table 3.

Table 3: Top Ten Languages Spoken at Home and Ability to Speak English in Greenville County

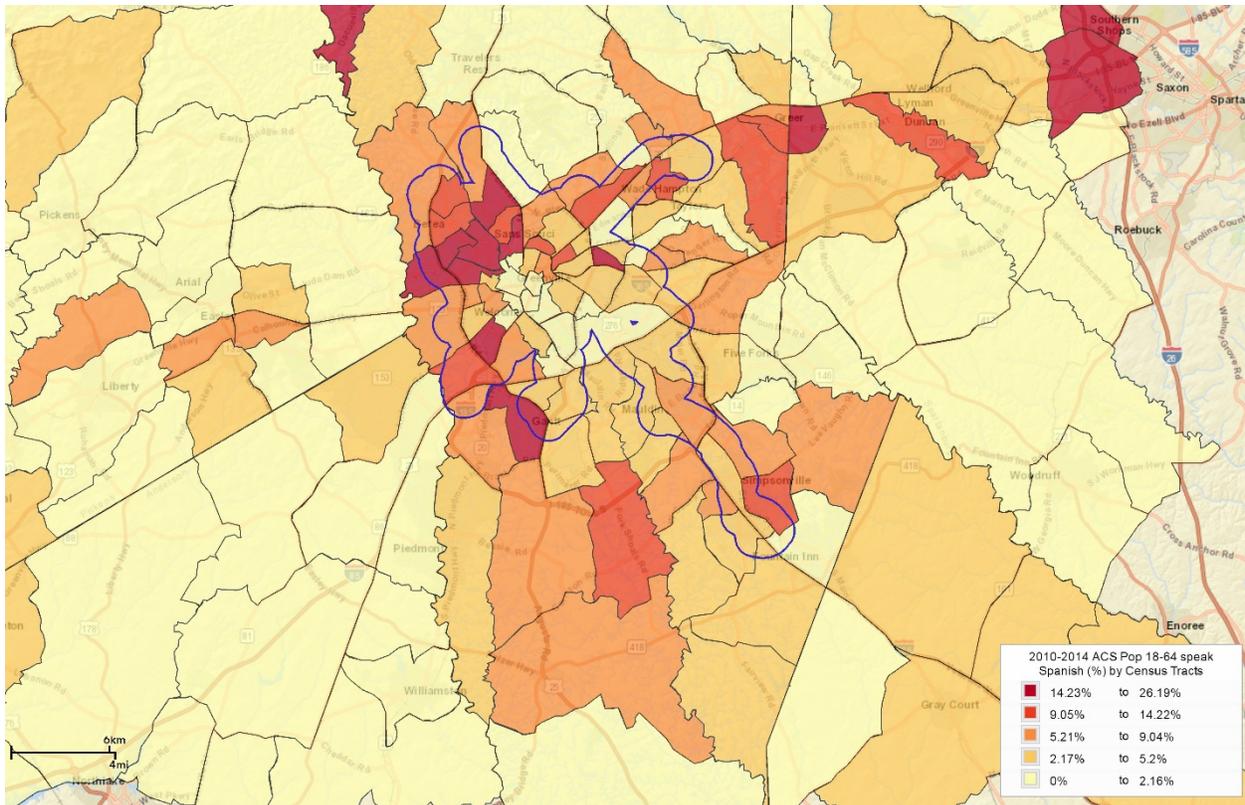
Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over	Greenville County, South Carolina
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	Estimate	Margin of Error
Total:	436,055	+/-64
Speak only English	387,722	+/-1,386
Spanish or Spanish Creole:	32,794	+/-1,036
Speak English "very well"	17,085	+/-1,018
Speak English less than "very well"	15,709	+/-902
French (incl. Patois, Cajun):	1,689	+/-275
Speak English "very well"	1,347	+/-253
Speak English less than "very well"	342	+/-124
German:	1,613	+/-381
Speak English "very well"	1,434	+/-357
Speak English less than "very well"	179	+/-71
Chinese:	1,563	+/-373
Speak English "very well"	789	+/-292
Speak English less than "very well"	774	+/-228
Korean:	890	+/-274
Speak English "very well"	442	+/-190
Speak English less than "very well"	448	+/-150
Vietnamese:	975	+/-358
Speak English "very well"	337	+/-179
Speak English less than "very well"	638	+/-268
Other Asian languages:	991	+/-338
Speak English "very well"	877	+/-302
Speak English less than "very well"	114	+/-85
Other Pacific Island languages:	98	+/-74
Speak English "very well"	74	+/-53
Speak English less than "very well"	24	+/-40
Arabic:	1,014	+/-379
Speak English "very well"	582	+/-230
Speak English less than "very well"	432	+/-235
African languages:	758	+/-424
Speak English "very well"	458	+/-223
Speak English less than "very well"	300	+/-328

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates

Conclusions: Spanish is the most prevalent language spoken by LEP persons in both Greenville County and the GTA/Greenlink service area and should be the primary focus of any translation or language assistance activities. There are populations in the community that speak non-English languages other than Spanish and it remains important to consider providing additional language assistance services as necessary and economically feasible. See Figure 2 for highest concentrations of Spanish-speaking persons by census tract within the GTA/Greenlink service area.

Figure 2- 2010-2014 ACS Spanish-speaking Census Tracts with GTA/Greenlink Service Area Overlay



Source: Greenville-Pickens Area Transportation Study (GPATS) 2017

Factor 2: The frequency with which LEP individuals come in contact with GTA/Greenlink services.

The vast majority of the populations with which we do business (individuals wishing to ride transit) are proficient in English, so LEP services are not normally required. However, since 10.1% of the residents living within the Greenlink service area are Hispanic or Latino in origin, Spanish is the only other language used when the occasion requires. For this purpose, GTA/Greenlink has printed the bus routes in Spanish.

GTA/Greenlink operates an Information Line to provide customer assistance and travel information via telephone for those seeking to use GTA/Greenlink services. The City of Greenville employs a Spanish-speaking person who is available to translate during normal business hours.

LEP individuals currently have infrequent and unpredictable contact with GTA/Greenlink services. However, the small and growing size of the LEP population in the GTA/Greenlink service area will likely increase its future contact with GTA/Greenlink services and it will be important to continue monitoring its population trends.

Factor 3: The nature and importance of service provided by GTA/Greenlink.

All contacts with GTA/Greenlink occur at the Transit Center located in downtown Greenville. We serve potential LEP persons on a daily basis via our fixed route service and demand response service. In an effort to serve LEP individuals, calls/contacts are handled by our Greenlink staff located at 100 W. McBee Avenue, Greenville SC.

Access to public transportation is critical for many to fully participate in society. GTA/Greenlink provides fixed route and paratransit services. Riders use GTA/Greenlink services for their multiple travel needs within the community, including trips to work, school, job interviews, grocery stores and retail shops, medical offices, community service agencies, and more.

Factor 4: The resources available to GTA/Greenlink and the overall cost.

GTA/Greenlink has an employee (bus operator) that speaks Spanish and is capable of interpreting on occasions when a person limited in English proficiency needs to contact the transit system.

GTA/Greenlink provides a number of publications in English and Spanish and prints Notices in English and Spanish as well. The Title VI complaint form is also available in Spanish as well as English.

GTA/Greenlink's annual operating budget will fund outreach efforts and translation services to effectively communicate with LEP persons in the community. As funding allows, GTA/Greenlink intends to continue such efforts into the foreseeable future. Modest funding is available for translation services, which are typically used for news releases, route information, passenger bulletins, and other marketing effort targeted at Spanish speaking audiences.

Implementing the Plan

Based on the four factor analysis, GTA/Greenlink has identified the language needs and services required to provide meaningful access to information for the LEP residents of Greenville County.

GTA/Greenlink will review its LEP Plan on an annual basis and incorporate LEP data gathering ventures, such as surveys, to further identify additional language area-specific needs for the top languages identified. A review of GTA/Greenlink's relevant programs, activities, and services that are being offered or will be offered by GTA/Greenlink as of December 2016 include:

- Spanish speaking translators are available upon request during normal business hours.
- Route and schedule brochures available in both English and Spanish.
- GTA/Greenlink conducted a Transit System Study rider survey in which the survey information was available in Spanish.
- The subsequent language surveys will be distributed at community outreach events and evaluated to enhance language needs.

GTA/Greenlink will actively and regularly contact the community organizations that serve LEP persons to identify any additional information or activities that might better improve GTA/Greenlink's services to assure non-discriminatory service to LEP persons. GTA/Greenlink will then evaluate the projected financial to provide the translation services and assess which of these can be provided most cost-effectively. The following is a list of community organizations that have been contacted or will be contacted to assist in gathering information about services most frequently sought by the LEP population:

Staff Training

To ensure effective implementation of this plan, GTA/Greenlink will schedule training at orientation for new hires and during mandatory meetings for all current employees on an annual basis.

- Review GTA/Greenlink's LEP Services available to the public
- How to handle verbal requests for transit service in a foreign language

- Review demographic data about local LEP population
- Notification of appropriate staff to notify when services are not met for an LEP persons

Notice to LEP Persons

USDOT LEP guidance provides that once an agency has decided, based on the four factors, that it will provide language services, it is important that the agency notify LEP persons of the services available free of charge, and in the language(s) LEP persons would understand. To this end, GTA/Greenlink will provide statements in public information and public notices language assistance or special accommodations will be provided to persons, with reasonable advance notice to GTA/Greenlink. GTA/Greenlink will provide undertake the following actions:

- With advance notice of seven (7) calendar days, provide *interpreter* services at public meetings. *Interpreter* services offered include foreign language and hearing impaired.
- Include in outreach documents, including notices, a statement that *interpreter* services are available at meetings, with seven days' advance notice.
- Publish GTA/Greenlink and federal complaint forms on the website, make them available at public meetings, and *reference* the availability of these *forms* and where to get them, in the LEP Plans.
- Train GTA/Greenlink staff on the requirements *for* providing meaningful access to services *for* LEP persons.
- Request support *from* the Information Technology Department to include a Google Translation Gadget on GTA/Greenlink's webpage that will convert the page to any language available in the Google Translator, including Spanish.
- Publication of the text portion of Route & Schedule Guides in English and Spanish, on the GTA/Greenlink website.
- Publication of notices of bus route changes in English and Spanish on the GTA/Greenlink website and provide such notices on buses, in shelters and at the GTA/Greenlink terminal.
- Inform community based organization and stakeholders of GTA/Greenlink services, including the availability of language assistance services, with notice.

Monitoring, Evaluating and Updating the Plan

On an annual basis, the Title VI Coordinator shall review changes in demographics and services provided to determine the need to modify or update frequently used services, programs and documents, to ensure accessibility for LEP services to the LEP public and employees.

The annual LEP Review shall include:

- Assessing current and historical LEP populations in the service area or population affected or encountered.
- Assessing current and historical LEP usage, including languages served.
- Determining the frequency of encounters with LEP language groups by surveying staff on how often they use language assistance services, if they believe there should be changes in the way services are provided or the providers that are used, and if they believe that the language assistance services in place are meeting the needs of the LEP community in our service area.
- Assessing customer satisfaction by surveying LEP candidates based on their experience of GTA/Greenlink's programs, benefits, services and the importance of activities to LEP persons.

- Reviewing any complaints from LEP persons about their needs that were received during the previous year.
- Solicit and evaluate feedback from community-based organizations and stakeholders about GTA/Greenlink's effectiveness and performance in ensuring meaningful access for LEP individuals.
- Updating the community demographics and needs by engaging school districts, neighborhood associations, faith communities, refugee resettlement agencies and other local resources.
- Monitor GTA/Greenlink's response rate to complaints or suggestions by LEP individuals, community members and employees regarding language assisted services provided.
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
- Educate or refresh staff to work effectively with in-person and telephone interpreters.
- Determining whether identified sources for assistance are still available and viable.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "Safe Harbor" means that if a recipient provides written translations (as under circumstances outlined in paragraphs A and B of the publication *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against Notional Origin Discrimination Affecting Limited English Proficient Persons*) such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

Strong evidence of compliance with the recipient's written-translation obligations under 'Safe Harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

GTA/Greenlink defines the LEP population by the people that speak English less than "very well" and the Spanish speaking population exceeds the 1,000 persons' threshold. There are 15,709 Spanish-speaking persons that speak English less than "very well" in Greenville County. To meet the Safe Harbor provisions, GTA/Greenlink will provide additional vital documents for its services for Spanish-speaking persons.

Dissemination of Plan

The Language Assistance Plan is available on our website at www.ridegreenlink.org under "About Us".

This Plan is also available at no cost in English upon request by telephone, fax, and mail or in person. If requested to be provided in another language and it is feasible to have it translated, it shall be provided at no cost to the requester.

Contact Information

Questions or comments about this plan may be submitted to:

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