

# Rome/Floyd County Planning Department (MPO): Rome Transit Department



## Title VI Plan

*Conditionally Adopted: December 11<sup>th</sup> 2014*

*Final Adoption: January 21<sup>st</sup> 2015*







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## 1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

*49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].*

The Rome Transit Department assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

The Rome Transit Department further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against the Rome Transit Department.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

**THIS ASSURANCE** is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Kathy Shealy, Transit Director, Rome Transit Department, Date: Month/Day/Year

## 2.0 Introduction & Description of Services

The Rome Transit Department submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

The Rome Transit Department is a sub-recipient of FTA funds and provides service in the City of Rome. A description of the current The Rome Transit Department system is included in Appendix B.

### **Title VI Liaison**

Kathy Shealy, Transit Director

Employed by : City of Rome Transit Department

706-236-4523

PO Box 1433- Rome, GA 30162-1433

### **Alternate Title VI Contact**

Phyllis Lee, Assistant Director

Employed by : City of Rome Transit Department

706-236-4523

PO Box 1433- Rome, GA 30162-1433

The Rome Transit Department must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

## 2.1 First Time Applicant Requirements

*FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.*

The Rome Transit Department is not a first time applicant for FTA/GDOT funding. The following is a summary of The Rome Transit Department's current and pending federal and state funding.

### Current and Pending FTA Funding

1. 5307, October 21, 2010, \$ 1,424,457.00, Pending
2. 5307, January 3, 2013, \$ 3,179,695.00, Pending
3. 5307, February 21, 2013, \$ 590,214.00, Pending

During the previous three years, GDOT did not complete a Title VI compliance review of the Rome Transit Department. The Rome Transit Department has not been found to be in noncompliance with any civil rights requirements.

## 2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

The Rome Transit Department will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

## 2.3 Title VI Plan Concurrence and Adoption

*FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.*

The Plan was approved and adopted by the Transportation Policy Committee during a meeting held on December, 11<sup>th</sup>, 2014. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan. A GDOT Concurrence letter was received for the Plan on April 24<sup>th</sup>, 2015.

**TRANSPORTATION POLICY COMMITTEE****A Resolution Adopting the 2014 Floyd-Rome Urban  
Transportation Study's Title VI Plan, Public Participation Plan, and  
Limited English Proficiency Plan**

WHEREAS, the Rome Floyd County Metropolitan Planning Organization (MPO) is a sub-recipient of Federal Transit Authority (FTA) funds and Federal Highway Authority (FHWA) funds, and provides transportation planning for the Metropolitan Planning Area; and

WHEREAS, the Rome Transit Department (RTD) is a sub-recipient of FTA funds and provides service within the City of Rome; and

WHEREAS, Title VI of the Civil Rights Act of 1964, 49 CFR Part 21 requires that federal sub-recipients develop and submit a Title VI Plan outlining practices and policies to ensure that low income, minority, and other underserved populations have equal access to transit services, and an opportunity to participate equally in the transportation planning process; and

WHEREAS, a public comment period seeking public input to the Title VI Plan was met according to local standards and federal regulations;

THEREFORE, this Transportation Policy Committee now approves and adopts the 2014 Rome Floyd County Title VI Plan, which shall remain in place until such time as it may be revisited as required by federal or state regulation.



**Buzz Wachsteter, Chairman**  
**Transportation Policy Committee**  
**January 21, 2015**

### 3.0 Title VI Notice to the Public

*FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.*

#### 3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

#### 3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of The Rome Transit Department's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of the Rome Transit Department's office(s) including the reception desk and meeting rooms, and on the Rome Transit Department's website at [www.romefloyd.com](http://www.romefloyd.com). Additionally, the Rome Transit Department will post the notice at stations, stops and on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan.

## 4.0 Title VI Procedures and Compliance

*FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.*

### 4.1 Complaint Procedure

If someone believes that they have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under any City of Rome Transit (RTD service, program or activity, they may file an official Title VI complaint with the RTD Title VI Coordinator. The following steps describe the procedures to file a complaint and how the City of Rome will respond.

1. The complaint must be submitted to the RTD Title VI Coordinator no later than 180 days after the date of the alleged discrimination.
2. A Title VI complaint form can be obtained by calling (706) 236-4523 or by downloading the form from our website at [www.romefloyd.com](http://www.romefloyd.com). Please provide the following information on the complaint form. Or you may submit a signed written statement that contains all of the following written information.
  - Your name, address and how to contact you (phone number, email address, etc.)
  - The basis of the alleged discrimination complaint (race, color, or national origin)
  - How, why, when and where you believe you were excluded from participation in, were denied the benefits of, or were subjected to discrimination. If the alleged incident occurred on the bus, give date, time of day, and bus number if available.
  - Include the location, names and contact information of any witnesses.
  - Indicate whether you have filed the complaint with Federal Transit Administration.
  - You must sign your letter of complaint.

If you as the complainant are unable to write a complaint, the RTD Title VI Coordinator will assist you with the complaint. RTD is committed to providing open access to its services to persons with limited ability to speak or understand English; if requested by complainant, the RTD Title VI Coordinator will provide language translation services.

3. The complaint shall be sent to the following address:

RTD Title VI Coordinator  
Ms. Kathy Shealy Director/Ms. Phyllis Lee Assistant Director  
City of Rome Transit Department  
P.O. Box 1433  
Rome, Georgia 30162-1433

4. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Rome Transit Title VI Coordinator will review every complaint, and when necessary, begin the investigation process. At a minimum the investigating will:
  - Identify and review all relevant documents, practices and procedures.
  - Identify and interview persons with knowledge of the alleged discrimination, that is, the person making the complaint; witnesses or anyone identified by the complainant, anyone who may have been subject to similar activity, or anyone with relevant information.
5. Upon completion of the investigation, the RTD Title VI Coordinator will complete a final report for the City Administrator. The investigation process and final report should take no longer than ninety (90) days after receipt of the complaint. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a copy of the final report together with any remedial steps.
6. If no violation is found and the complainant wishes to appeal the decision, he or she may contact the Federal Transit Administration, 230 Peachtree Street NW, Suite 800, Atlanta, GA 30303 Attention: Regional Civil Rights Officer, or by calling (404) 865-5628, or website [http://www.fta.dot.gov/civilrights/title6/civil\\_right\\_5104.html](http://www.fta.dot.gov/civilrights/title6/civil_right_5104.html) . Complainants may also file their initial Title VI complaint directly, no later than 180 days after the date of the alleged discrimination, to the Federal Transit Administration.

## 4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on the Rome Transit Department and the Rome/Floyd County Planning Department's (MPO) website ([www.romefloyd.com](http://www.romefloyd.com)).

## 4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. The Rome Transit Department will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

## 4.4 Sub-recipient Assistance and Monitoring

The Rome Transit Department does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, the Rome Transit Department utilizes the sub-recipient assistance and

monitoring provided by GDOT, as needed. In the future, if Your Transit System has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

#### 4.5 Sub recipients and Subcontractors

The Rome Transit Department is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. The Rome Transit Department, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

##### Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, The Rome Transit Department shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Rome Transit Department, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

#### **Disadvantaged Business Enterprise (DBE) Policy**

As a condition of your agreement with GDOT, The Rome Transit Department and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. The Rome Transit Department and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

#### **E-Verify**

As a condition of your agreement with GDOT, vendors and contractors of The Rome Transit Department shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with The Rome Transit Department. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for The Rome Transit Department shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for The Rome Transit Department.

## 5.0 Title VI Investigations, Complaints, and Lawsuits

*FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations...; lawsuits, and complaints naming the recipient.*

In accordance with 49 CFR 21.9(b), The Rome Transit Department must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by The Rome Transit Department in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT.

The Rome Transit Department has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years.

## 6.0 Public Participation Plan

*FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.*

The Public Participation Plan (PPP) for The Rome Transit Department was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for The Rome Transit Department. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about The Rome Transit Department services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

### Current Outreach Efforts

The Rome Transit Department is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of The Rome Transit Department's recent, current, and planned outreached activities.

- In 2011 MPO and RTD asked survey questions concerning transportation and transit at the Coosa Valley Fair.
- In 2012 MPO and RTD asked survey questions concerning transportation and transit via surveymonkey.
- In 2013 MPO and RTD asked survey questions concerning transportation and transit at a transportation fair held in downtown Rome.
- In 2014 MPO and RTD asked survey questions concerning transportation and transit at the RTD transit station in downtown Rome.

In all cases, the survey was advertised and conducted in English and Spanish.

## 7.0 Language Assistance Plan

*FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).*

The Rome Transit Department operates a transit system within Floyd County. The Language Assistance Plan (LAP) has been prepared to address The Rome Transit Department's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In The Rome Transit Department service area there are 3,310 residents or 9.99% who describe themselves as not able to communicate in English very well (Source: US Census). The Rome Transit Department is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Rome Transit Department has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

## 8.0 Transit Planning and Advisory Bodies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.*

The Rome Transit Department has a Citizen’s Advisory Committee (CAC) that advises both the MPO and the RTD. The CAC participates in the following:

1. Review each year the accomplishments of the transportation study including the LRTP, the BPP, the CDR, the TIP, and the UPWP
2. Assess the work of the staff, TPC and the TCC and make recommendations as appropriate.
3. Assess public opinion relative to the transportation study's activities with recommendations to the TPC and TCC, and to the Transit Committee of the Rome City Commission.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population (2010 US Census): 36,303	57.4%	16.2%	27.8%	1.9%	0.6%	2.1%
CAC	85%	0%	15%	0%	0%	0%

- Three members of the CAC serve as advocates for the disabled.

The Rome Transit Department will make efforts to encourage minority participation on the committee. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit system. The Rome Transit Department will utilize the minority population demographic maps included in Appendix I in order to focus on the areas in which the committee participation information is distributed.

## 9.0 Title VI Equity Analysis

*FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.*

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, The Rome Transit Department will ensure the following:

1. The Rome Transit Department will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The Rome Transit Department will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, the Rome Transit Department will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If the Rome Transit Department determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the Rome Transit Department may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The Rome Transit Department must demonstrate and document how both tests are met. The Rome Transit Department will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The Rome Transit Department has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, the Rome Transit Department does not have any Title VI Equity Analysis reports to submit with this Plan. The Rome Transit Department will utilize the demographic maps included in Appendix I for future Title VI analysis.

## 10.0 System-Wide Service Standards and Service Policies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

The Rome Transit Department is a fixed route service provider.

FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

The Rome Transit Department has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

### 10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The Rome Transit Department has prepared standards for all modes it operates including Main Line, Tripper, and Para-Transit.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
< 30' Para-Transit Bus	16	0	16
< 30'	24	4	26
30' Low Floor Bus	22	0	26
40' Standard Bus	44	8	52

- All vehicles are wheelchair-accessible

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
WEEKDAY	Peak	Base	Evening	Night
Route 1A- West Rome/	60	60	60	NA

Shorter Avenue				
Route 1B- West Rome/ Summerville Park	60	60	60	NA
Route 2A- East & South Rome/Cedar Avenue & South Broad Street	60	60	60	NA
Route 2B- East & South Rome/ Maple Street & Branham Avenue	60	60	60	NA
Route 3- North Rome/ Calhoun Avenue & Riverside Parkway	60	60	60	NA
<p><i>* Peak: 6-10 am and 3-6 pm; Base 10am - 2pm; Evening: greater than 6:00 pm – No Weekend Service</i></p> <p><i>"--"means no service is provided during that time period.</i></p>				

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. The Rome Transit Department on-time performance objective is 90% or greater. The Rome Transit Department continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

d. Service Availability

The Rome Transit Department will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service or within a ½ mile walk of rail service.

**10.2 Service Policies**

FTA requires fixed route transit providers to develop a policy for service indicators. The Rome Transit Department has prepared the following policies for its transit system.

a. Distribution of Transit Amenities

Installation of transit amenities along bus and rail routes are based on the number of passengers boarding at stops and stations along those routes.

b. Vehicle Assignment

All City of Rome Transit Department Vehicles are housed at the main office at 168 North Avenue, Rome, GA 30162.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

All Buses are equipped with Automated Voice Announcement systems, wheel chair accessible, and both internal and external cameras.

## 11.0 Appendices

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APPENDIX K	TEXT FORMATTING PALETTE

# **Appendix A**

## **FTA Circular 4702.1B Reporting Requirements for Transit Providers**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

### General Requirements

*All recipients must submit:*

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

### Requirements of Transit Providers

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
- Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:*

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

# **Appendix B**

## **Current System Description**

## Current System Description

1. An overview of the organization including its mission, program goals and objectives.  
The City of Rome Transit Department's System current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to city residents. Our Mission Statement states the following: "To provide professional, safe and effective public transportation, increase ridership, and keep operating cost to a minimum.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.  
The City of Rome Transit System is a non-profit 501(c)(3)] organization. Our organization is made up of forty (45) full-time employees. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to the Public Service Manager. We have Public Services/Transit Committee Board made up of a Board of City Commissioners (BCC). Our BCC is committed to this program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in the City of Rome's Personnel Policies for fiscal year 2014, (page 10). We currently operate from 5:40 to 6:30 daily service hours averaging 11.17 total fleet service hours per day assuming 252 operating days.
3. Indicate if your agency is a government authority.  
The City of Rome Transit Department operates as a non-profit 501(c) (3)] .
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
  
The City of Rome Transit System's Director is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The City of Rome Transit Director is responsible for annual renewal of all liability insurance for agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Directors responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?  
Maintenance on all agency vehicles is provided by the City of Rome transit garage personnel. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 168

North Avenue, Rome, GA, and are maintained by the Shop Supervisor]. All records are maintained and retained for a minimum of four (4) years.

6. Number of current transportation related employees

Our transportation department has a total of 45 (forty-five) employees that include: 29 (twenty-nine) full-time drivers, 5 part-time drivers, 2 (two) administrators and 6 (six) support staff.

7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All our drivers are required to carry a Commercial Driver's License. This allows coverage of all of the larger vehicles and for the opportunity for the other drivers to fill in on service routes with the larger vehicles.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to customers. Our service incorporates Fixed Route and Para-Transit Services. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes buses. 34 (thirty-one) of our vehicles and all are equipped for wheelchair service. We utilize our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at the City of Rome Transit department garage and record the appropriate age and mileage of all vehicles.

# **Appendix C**

## **Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter**

**Rome - Floyd County Metropolitan Planning Organization (MPO)  
 Transportation Policy Committee (TPC)  
 11 December 2014, 10:00 a.m., Carnegie Room**

**Present:**

Buzz Wachsteter, Rome	Michael Skeen, Floyd County	Forrest Rose, GDOT
Kyle Mote, GDOT	Blake Nicholson, GDOT	Jamie McCord, Floyd County
Kirk Milam, Rome	Tom Lindsey, Guest	Sandra Lindsey, Guest
Larry Maxey, Floyd County	Patrick Eidson, Rome	Ken Wright, Chamber
Irwin Bagwell, Floyd County	Rob Ware, Cave Spring	Jeremy Stewart, RN-T

Chair Wachsteter called the meeting to order at 10:02 a.m.

The minutes from the September 2014 meeting were approved by common consent but Wachsteter said directing truck traffic around downtown Rome was discussed.

Hiller reported that the bike/ped plan draft would be discussed at a public meeting on 16 December from 5:30-7:00 at the Forum. Wachsteter said the plan is causing concern and it needs more public input. Bagwell said the plan was not directed by the elected officials, people did not have a chance to participate in the planning process, and it needs to go. Ware agreed that the plan needs more work. Mote said the plan needs to be coordinated with District 6.

The Cave Spring bike/ped presentation was postponed.

Wright reported that trucks leaving US27 at the Maple Road interchange have trouble maneuvering, trucks should be using the Darlington Drive Interchange. He asked for signage on SR411. Ware said the GPS service companies were directing trucks to use the Maple Road interchange, and McCord said the County is trying to reach out to them to get them to change. Nicholson said he would check into getting signage.

Wright also reported on a transportation meeting at the Chamber where GDOT officials discussed the new route for the US411 Connector. Wright said Rome is 3<sup>rd</sup> in the state for receiving shipping containers from Savannah, so the route is critical to economic development. Wachsteter said the community needs to send a letter to GDOT looking at the entire corridor and getting it into the Long Range Transportation Plan.

The 2014 updated Participation Plan, Limited English Proficiency Plan, and Title VI Plan are out for public comment; to date, no comments have been received. By unanimous vote the Plans were adopted, conditioned on no comments being received for the remainder of the comment period.

Work on the 2016 Long Range Transportation Plan continues, with fine tuning of the socio-economic data.

**REPORTS:**

- McCord reported that GDOT (D.Comer) is considering the best plan for improvement of the Black Bluff Road approach to the SW bypass at Lock and Dam Road. Skeen reported that 2012, 2013, and 2014 LMIG paving is completed and Floyd County is working with the City of Rome on signalization of Barron Road.
- Milam reported that 2012, 2013, and 2014 LMIG paving is complete and the 2015 list is being developed. He said the Crescent Avenue Bridge project is nearly complete. RTD will be closed for Christmas Eve afternoon, and all day Christmas Day and New Year's Day.
- Ware reported that Cave Spring has nearly completed sidewalk construction and invited everyone to the Christmas Parade.
- There was no report from Atlanta GDOT, except Mote said that M. Haithcock had retired. For the District, Nicholson reported that the west bypass is 75% complete and on schedule, ROW acquisition for the southeast bypass has not yet started, ROW acquisition for the south bypass is nearly done and let will be in 2017, and SR140 improvements will be let in the first quarter of 2015.
- No one was present to report for FHWA.

There being no further business, the meeting was adjourned at 10:55.

**The next meeting will be 22 January 2015.**

Russell R. McMurry, P.E., Commissioner



**GEORGIA DEPARTMENT OF TRANSPORTATION**

One Georgia Center, 600 West Peachtree Street, NW  
Atlanta, Georgia 30308

April 24, 2015

Kathy Shealy  
Rome Transit  
168 N. Ave P.O. Box 1433  
Rome, GA 30162

Dear Ms. Shealy,

Thank you for the recent submission of the Rome Transit Title VI Plan. This Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53 Section 5332 of the United States Code; and the **Federal Transit Administration's (FTA) Circular 4702.1B**, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Upon review of your Title VI Program submission and under the guidance provided in **FTA circular 4702.1B**, we have determined that your submission [does] meet the requirements as set forth in the circular.

Thank you for your ongoing cooperation in meeting all of the FTA Civil Rights Program requirements. Should you need assistance, or have any questions regarding the comments above please do not hesitate to contact Ms. Nadara Wade, our FTA Title VI Program Liaison, directly at (404) 631-1231 or at [nwade@dot.ga.gov](mailto:nwade@dot.ga.gov).

Sincerely,



Crystal Odum Ford, Transit Division Manager  
cc: Nadara L. Wade-Public Transportation Coordinator  
DBE/Drug and Alcohol/Title VI FTA Compliance  
Antoine Hawkins, Transit Planner  
Theo Letman, Urban Group Leader

# **Appendix D**

## **Title VI Sample Notice to Public**

**Notifying the Public of Rights Under Title VI****The Rome Transit Department and the Metropolitan Planning Organization of Rome and Floyd County**

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

For more information on The Rome Transit Department's civil rights program, and the procedures to file a complaint, contact 706-236-4523; email [KShealy@rome.ga.us](mailto:KShealy@rome.ga.us); or visit our administrative office at 168 North Avenue, Rome, Georgia 30162. You may also contact the Metropolitan Planning Department at 706-236-5025, email [Shiller@rome.ga.us](mailto:Shiller@rome.ga.us); or visit the planning department at 607 Broad Street, Rome, Georgia 30162. For more information, visit [www.romefloyd.com](http://www.romefloyd.com).

If information is needed in another language, contact 706-236-4523.

You may also file your complaint directly with the FTA at: Federal Transit Administration Office, 230 Peachtree Street NW, Suite 800, Atlanta, GA 30303 Attention: Regional Civil Rights Officer

The Rome and Floyd County Metropolitan Planning Organization fully complies with Title VI of the Civil Rights Act of 1964 and its related statutes and regulations in all programs and activities.

As set forth in the Americans with Disabilities Act of 1992, the Rome City Government and the Floyd County Government do not discriminate on the basis of disability, and will assist citizens with special needs given proper notice (seven working days). As set forth in Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., 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. To that end the City or Rome and Floyd County will make a reasonable effort to find translators, given proper notice (seven working days).

For more information or to obtain a Discrimination Complaint Form, please call (706)-236-5025 or e-mail [Shiller@rome.ga.us](mailto:Shiller@rome.ga.us).

**AVISO AL PUBLICO DE LOS DERECHOS BAJO EL TITULO VI**

**Departamento de Tránsito de Rome**

- El Departamento de Tránsito de Rome opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido afectada por cualquier práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante el Departamento de Tránsito de Rome.
- Para mas información sobre el programa de Derechos Civiles del Departamento de Tránsito de Rome, y el procedimiento para presentar una queja, llamar al 706-236-453; email [KShealy@rome.ga.us](mailto:KShealy@rome.ga.us); o visite nuestra oficina administrativa en la 168 North Avenue, Rome, Georgia 30162. Usted tambien puede llamar al 706-236-5025, email [Shiller@rome.ga.us](mailto:Shiller@rome.ga.us) ; o visitar el Departamento de Planeación en la 607 Broad Street, Rome, Georgia 30162. Para más información visita [www.romefloyd.com](http://www.romefloyd.com).
- Si necesita información en otro language, llamar al 706-236-4523.
- Usted tambien puede presentar su queja directamente a FTA: Oficina de la Administración Federal de Tránsito (Federal Transit Administration Office), 230 Peachtree Street NW, Suite 800, Atlanta, GA 30303. Con Atención al: Oficial Regional de Derechos Civiles.

La Secretaría de Planificación Metropolitana del Condado de Floyd y de la Ciudad de Rome cumple a cabalidad con el Título VI de la Ley de Derechos Civiles de 1964 y sus estatutos y reglamentos relacionados con el mismo en todos los programas y actividades. Tal como se establece en la Ley de Estadounidenses con Discapacidades de 1992, el Gobierno de la Ciudad de Rome y del Condado de Floyd no discrimina a discapacitados y ayudarán a los ciudadanos con necesidades especiales que notifiquen debidamente (siete días hábiles). Según lo establecido en el Título IV de la Ley de Derechos Civiles de 1964, 42 U.S.C. 2000d et seq., ninguna persona en los Estados Unidos debe, a causa de su raza, color, ó nacionalidad, ser excluido de participar en, negarle los beneficios de, o ser sujeto a discriminación de cualquier programa o actividad que reciba asistencia financiera Federal. Por esto, la Ciudad de Rome y el Condado de Floyd harán un esfuerzo razonable para encontrar traductores, para personas que notifiquen debidamente (siete días hábiles).

Para mas información ó para obtener un Formulario de Reclamos por discriminación, por favor llamar al (706) 236-5025 ó enviar un correo electrónico a [Shiller@rome.ga.us](mailto:Shiller@rome.ga.us).

# **Appendix E**

## **Title VI Complaint Form**

**TITLE VI COMPLAINT FORM**

**Section I:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (home): \_\_\_\_\_ Telephone (work): \_\_\_\_\_

Electronic Mail Address: \_\_\_\_\_

Accessible Format Requirements:

Large Print: \_\_\_\_\_

TDD: \_\_\_\_\_

Audio Tape: \_\_\_\_\_

Other: \_\_\_\_\_

**Section II:**

Are you filing this complaint on your own behalf? Yes\* \_\_\_\_\_ No: \_\_\_\_\_

\*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining

\_\_\_\_\_

Please explain why you have filed third

party \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes \_\_\_\_\_ No \_\_\_\_\_

**Section III:**

I believe the discrimination I experienced was based on (check on that apply);

Race \_\_\_\_\_ Color \_\_\_\_\_ National Origin \_\_\_\_\_

Date of 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 name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Section IV:**

Have you previously filed a Title VI complaint with this agency? Yes \_\_\_\_\_ No \_\_\_\_\_

**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court? Yes \_\_\_\_ No \_\_\_\_

If Yes, check all that apply:

Federal Agency \_\_\_\_ State Agency \_\_\_\_ Federal Court \_\_\_\_

Local Agency \_\_\_\_ State Court \_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Section VI:**

Name of agency complaint is against: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

You may attach any written materials of 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:

Kathy Shealy  
Transit Director  
City of Rome  
168 North Avenue  
Rome, Georgia 30162

OR

Sue Hiller  
Planning Director  
Rome and Floyd County  
607 Broad Street  
Rome, Georgia 30161

Mailing Address: P.O. Box 1433  
Rome, Georgia 30162

**FORMULARIO DE DENUNCIAS DEL TITULO VI**

**Sección I:**

Nombre: \_\_\_\_\_  
 Dirección: \_\_\_\_\_  
 Teléfono (Casa): \_\_\_\_\_ Teléfono (Trabajo): \_\_\_\_\_  
 Dirección de Correo Electrónico: \_\_\_\_\_  
 Requisitos del Formato Accesible:

Material Impreso:  
 TDD:  
 Cinta de Audio:  
 Otro:

**Sección II:**

Usted esta llenando esta denuncia por su propia cuenta? \*Si\_\_\_ No\_\_\_

\*Si la respuesta a esta pregunta es "Si", pasar a la Sección III.

Si es "No", por favor proporcione el nombre y la relación que tiene usted con la persona que esta presentando la queja

\_\_\_\_\_

Por favor explique por qué usted esta presentando a un tercero

\_\_\_\_\_

Por favor confirme que usted ha obtenido permiso de la parte ofendida si es que usted esta llenando la forma en nombre de un tercero. Si \_\_\_ No\_\_\_

**Sección III:**

Yo creo que la discriminación que experimenté fue en base a (Marque las que apliquen);

Raza\_\_\_ Color\_\_\_ Origen Nacional\_\_\_

Fecha de la Presunta Discriminación (Mes/Día/Año): \_\_\_\_\_

Explique lo mas claramente posible que pasó y por qué usted cree que fue discriminado. Describa todas las personas que estuvieron involucradas. Incluya los nombres y la información de contacto de las personas que lo discriminaron (si los conoce) así como también los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use la parte de atras de esta forma

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Sección IV:**

Usted ha presentado anteriormente un formulario de denuncias del Titulo VI con esta agencia?

Si \_\_\_ No\_\_\_

**Sección V:**

Usted ha presentado esta denuncia ante cualquier otra agencia Federal, Estatal ó Local, ó ante cualquier Corte Federal ó Estatal? Si\_\_\_ No\_\_\_

Si es "Si", Marque todas las que aplican:

Agencia Federal \_\_\_

Agencia Estatal\_\_\_

Corte Federal\_\_\_

Agencia Local \_\_\_

Corte Estatal \_\_\_

Por favor proporcione la información de la persona de contacto en la Agencia/Corte donde usted presentó la denuncia:

Nombre: \_\_\_\_\_

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

**Sección VI:**

Nombre de la Agencia de la cual se esta quejando: \_\_\_\_\_

Persona de Contacto: \_\_\_\_\_

Título: \_\_\_\_\_

Número Telefónico: \_\_\_\_\_

Usted puede adjuntar cualquier material escrito u otra información que usted piense es relevante para su denuncia.

Firma y Fecha requerida abajo

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor entregue esta forma en persona a la dirección de abajo ó envíela por correo a:

Kathy Shealy  
Directora de Tránsito  
Ciudad de Rome  
168 North Avenue  
Rome, Georgia 30162

ó

Sue Hiller  
Directora de Planeación  
Rome y Condado de Floyd  
607 Broad Street  
Rome, Georgia 30161

Dirección de Correo Postal: P.O. Box 1433  
Rome, Georgia 30162

# **Appendix F**

## **Public Participation Plan (PPP)**

## Public Participation Plan

### Introduction

The Floyd-Rome Urban Transportation Study (FRUTS) is an element of a planning process established by the Federal Aid Highway Act of 1962, and amended by subsequent legislation, i.e., the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA), the Transportation Equity Act for the 21<sup>st</sup> Century of 1998 (TEA21), the Safe, Accountable, Flexible, Efficient Transportation Equity Act: a Legacy for Users of 2005 (SAFETEA-LU), and The Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21). The primary objective of the FRUTS effort is the development of plans and programs that address the transportation needs of the Floyd-Rome community. For that reason, with every major update of the Long Range Transportation Plan (LRTP), this Participation Plan is reviewed and revised as necessary to ensure that adequate opportunity is provided for input by citizens, agencies and other entities with an interest in transportation.

### Requirements of the Planning Process

This Participation Plan is guided by the June 9, 2006 proposed rulemaking for public participation procedures for metropolitan planning organizations incorporating the changes to the Code of Federal Regulations due to the passage of the legislation, Safe, Accountable, Flexible, Efficient Transportation Equity Act: a Legacy for Users (SAFETEALU) and affirmed in the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21). The MAP-21 legislation integrates performance into many federal transportation programs and contains several performance elements.

The language below is taken from the U.S. DOT Federal Highway Administration 23 CFR Part 450.316: Interested parties, participation, and consultation - as well as the Federal Transit Administration 49 CFR Part 613.300:

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, 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 with reasonable opportunities to be involved in the metropolitan transportation planning process.

**(1)** The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:

- (i)** Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;
- (ii)** Providing timely notice and reasonable access to information about transportation issues and processes;

- (iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;
- (iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
- (v) Holding any public meetings at convenient and accessible locations and times;
- (vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;
- (vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
- (viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;
- (ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part; and
- (x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.

**(2)** When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.

**(3)** A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

**(b)** In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, metropolitan transportation plans and TIPs shall be developed with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:

- (1)** Recipients of assistance under title 49 U.S.C. Chapter 53;
- (2)** Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and
- (3)** Recipients of assistance under [23 U.S.C. 204](#).

**(c)** When the MPA includes Indian Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.

- (d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and the TIP.
- (e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under § 450.314.”

### History of FRUTS Efforts

The Floyd-Rome transportation planning process began in 1969, even though the study area was not formally under the direction of the federal regulations until 1983. As a result of these local efforts, the 1975 Floyd-Rome Transportation Plan was produced. With the publication of the 1980 Census, the Rome area became a designated "urbanized area". This means that the City of Rome along with its densely-settled surrounding area have a population of at least 50,000 persons. This designation allows the local governments of the City of Rome and Floyd County to formally participate with GDOT, and receive funding for, transportation planning in the defined urban area. With this funding, staff of the Rome-Floyd County Planning Commission began the process of updating the 1975 plan by publishing three documents: 1980-83 Base Year Socio-Economic Data, Floyd-Rome Economic and Population Growth Indicators, and Floyd-Rome Traffic Volume Trend Analysis. During 1985 and 1986 the Planning Commission staff and the staffs of the City of Rome, Floyd County and Georgia Department of Transportation worked hard on data gathering, model development, and plan development activities. The results of these efforts bore fruit in late 1987 with the adoption of the Floyd-Rome Urban Transportation Study Long Range Transportation Plan.

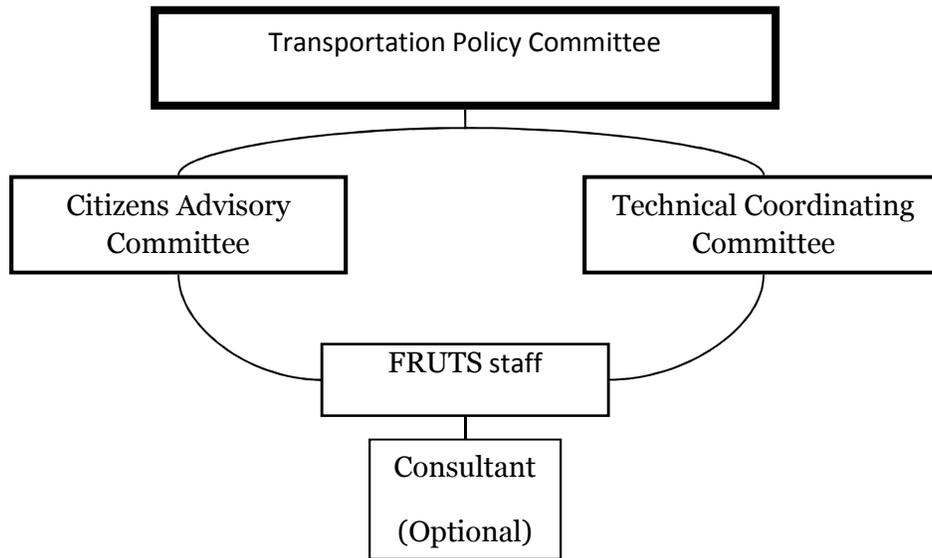
The last major update of the FRUTS Long Range Transportation Plan planning began in 2011 and concluded in April of 2012. As part of that process, this participation plan was updated to reflect current federal requirements and the local policies and procedures adopted to comply with those requirements.

The 2012 update also reflected the 2004 expansion of the FRUTS area to include all of Floyd County, including the City of Cave Spring. The 2014 update of this plan (and the upcoming 2016 LRTP) reflects compliance with the latest federal regulations contained in The Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21).

### Organizational Structure

The Floyd-Rome Urban Transportation Study (FRUTS) involves policy makers, citizenry and staff in carrying out comprehensive transportation planning for the City of Rome and the urbanized area of Floyd County including the City of Cave Spring. This planning provides problem study and direction for a broad range of existing and projected transportation issues in the FRUTS area. Figure 1 shows the organizational structure for conducting the FRUTS.

## FLOYD-ROME URBAN TRANSPORTATION STUDY ORGANIZATIONAL STRUCTURE



### Participants

The three political jurisdictions involved in the study area are the City of Rome, City of Cave Spring, and Floyd County. The coordination responsibility for the FRUTS planning activities on a local level has been delegated to the Rome-Floyd County Planning Department, the designated Metropolitan Planning Organization (MPO). One full-time staff member, the Rome-Floyd County Transportation Planner, is responsible for the administration of these duties. Other planning department staff members also assist the program. Close technical support is provided by the Offices of Planning and the Offices of Intermodal Programs of the Georgia Department of Transportation and by divisional staff of the Federal Highway Administration.

### Committees

The governing structure of the FRUTS is composed of three committees: 1) the Transportation Policy Committee (TPC); 2) the Technical Coordinating Committee (TCC); and 3) the Citizens Advisory Committee (CAC) (see figure 1).

The Transportation Policy Committee and the Technical Coordinating Committee provide policy guidance and the necessary technical support for the planning process. The Citizens Advisory Committee reviews all components of the FRUTS documents, and advises the TPC on adoption of the documents. Coordination of the work of the three committees is achieved through the efforts of FRUTS staff. The Cities of Rome and Cave Spring, and Floyd County contribute to the transportation planning

process through their membership on the committees and financial support for the FRUTS staff. The placement of the CAC chair on both the TPC and the TCC ensures that those groups have an opportunity to hear and consider CAC recommendations. The chair of the Rome – Floyd County Planning Commission also sits on the TPC and provides a link between the transportation and comprehensive planning processes.

The TPC consists of elected and appointed officials and senior management staff from the three local governments. Some of the responsibilities of the TPC are the following:

- 1) Receive and approve all major policy goals and objectives for the transportation planning process relevant to the Floyd-Rome urbanized area.
- 2) Review and adopt amendments to transportation planning concepts and plans, including the FRUTS Long-Range Transportation Plan (LRTP), the Bike/Ped Plan (BPP), the Conformity Determination Report (CDR), and the Transportation Improvement Program (TIP).
- 3) Review the progress toward implementation of the TIP and recommend any changes in the priority schedule.
- 4) Approve the FRUTS Unified Planning Work Program (UPWP) each year.

The TCC is a committee of transportation specialists whose role is to bring together and coordinate all the technical activities in the transportation planning process. The TCC provides progress reports to both the TPC and the CAC. The TCC is responsible for:

- 1) Assisting staff with the production of the UPWP, the LRTP, the BPP, the CDR, and the TIP as delegated by the TPC.
- 2) Advising the TPC of any proposed changes in transportation planning concepts as well as in the LRTP or CDR.
- 3) Analysis of data collected and preparation of reports and findings within the framework of the "lead agency" format.
- 4) Maintaining current data for use in the transportation planning process.

The CAC was restructured in 1993 to include private sector providers of public transportation and balanced representation of city and county residents, transit users, the elderly, and disabled. The CAC ensures that citizen participation in the transportation planning process will be met. This committee functions by providing information to the interested public regarding transportation plans and projects. The CAC will participate in the review of social, economic and environmental considerations that are essential for developing a viable transportation study for the area. The CAC, through establishment of various subcommittees and regular committee meetings, should participate in the following:

- 1) Review each year the accomplishments of the transportation study including the LRTP, the BPP, the CDR, the TIP, and the UPWP
- 2) Assess the work of the staff, TPC and the TCC and make recommendations as appropriate.

- 3) Assess public opinion relative to the transportation study's activities with recommendations to the TPC and TCC, and to the Transit Committee of the Rome City Commission.

### **FRUTS Policy on Public Involvement**

The Rome-Floyd County Planning Commission, the designated Metropolitan Planning Organization (MPO) for the Rome-Floyd urbanized area, is responsible for meeting the requirements of the federal rules pertaining to public involvement in the metropolitan transportation planning process.

It is the intention of the MPO to adhere to an inclusive policy for the purpose of effecting meaningful public input into the preparation of documents such as the Transportation Improvement Program, FRUTS Long-Range Transportation Plan, Conformity Determination, and the Bicycle and Pedestrian Plan. To this end, the CAC will play a key role in channeling public input into the planning process. The CAC has been in existence since 1987. The CAC Chairperson is a voting member of the TPC and the CAC Vice Chairperson is a non-voting, advisory member of the TCC.

A concerted effort will be made to ensure that members chosen for the CAC will represent users of various modes of transportation including, but not limited to, bicycle and pedestrian, transit, air, freight, and highway.

The meetings of the CAC are scheduled to allow the CAC to be briefed on transportation planning activities prior to the TPC meetings. At regularly scheduled CAC meetings, the TIP and other planning documents will be presented in the early stages of the process to allow opportunities for public input.

Beyond the CAC members, public information meetings for the general public will be held on the TIP and other planning documents prior to final approval by the PC. Citizens will be given reasonable notice of an opportunity to comment on the TIP and other proposed plans. Basic background information will be made available to the CAC and the general public to ensure that the public is informed on the transportation planning process.

### **Notice**

Meetings of all three committees shall be advertised through public notices published in the local newspaper prior to the meeting, and if possible, the web pages of the local governments.

### **Location of Documents**

Documents of the process, including minutes and draft documents shall be made available for public review at the offices of the Rome-Floyd County Planning Commission, the City of Rome Clerk's Office, the Floyd County Clerk's Office, the City of Cave Spring Clerk's office, and the Rome-Floyd County Library. The documents shall also be posted on local government web pages.

## Accessibility, Opportunity, Open Meetings, and Public Records requirements

It is the intent of the FRUTS process to fully comply, to the extent practicable, with the Georgia law on Open and Public Meetings (OCGA §50-14-1, et seq.), and Inspection of Public Records (OCGA §50-18-70, et seq.) (see attached).

Efforts to involve the public in the planning process will be consistent with Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State under 23 U.S.C. 324 and 29 U.S.C. 794, which ensure that no person shall, on the grounds of race, color, sex, national origin, or physical handicap, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program receiving Federal assistance from the United States Department of Transportation.

The MPO will identify actions necessary to comply with the Americans With Disabilities Act of 1990 (Pub. L. 101-336, 104 Stat. 327, as amended) and U.S. DOT regulations "Transportation for Individuals with Disabilities" (49 CFR Parts 23, 37, and 38). Public notices for public meetings will provide that any special needs for disabled individuals may be requested provided adequate advance notice of the need is provided to FRUTS staff. The MPO maintains a Limited English Proficiency (LEP) Plan that outlines efforts to ensure that non-English speakers are provided an opportunity to participate. The LEP will be updated when meaningful data on language spoken within the community is available.

## Schedule

Meetings of the TPC are generally scheduled to take place every other month with the first meeting of the year taking place in January. Meetings of the CAC are scheduled to take place before the TPC meetings and are held every other month beginning in January. The TCC meetings are scheduled for every other month, also. A schedule of regular meeting dates is adopted by each committee annually. In addition, from time to time the need for called special meetings arises. All meetings will be established in accordance with Georgia law and the bylaws of the respective committee. The times and dates of these meetings are subject to verification each month. Interested persons may contact the Floyd-Rome Transportation Planner regarding meeting times, dates and locations.

While all committees (TPC, TCC, and CAC) are open to the public, citizens wanting to speak regarding projects will be encouraged to speak at the CAC meetings. Citizens can request an opportunity to speak by writing or calling the transportation planner, the CAC chairperson or vice-chairperson before the meeting.

## Contacts

Floyd-Rome Transportation Planner  
Rome-Floyd County Planning Department  
P.O. Box 1433  
Rome, Georgia 30162-1433

(706) 236-5025

Chairperson, Citizens Advisory Committee

Rome-Floyd County Planning Department

P.O. Box 1433

Rome, Georgia 30162-1433

(706) 236-5025

Vice-Chairperson, Citizens Advisory Committee

Rome-Floyd County Planning Department

P.O. Box 1433

Rome, Georgia 30162-1433

(706) 236-5025

### Comment Periods

The Participation Plan shall be periodically reviewed by the MPO and TPC in terms of its effectiveness in assuring that the process provides full and open access to all persons. The process will be evaluated and refined by following up with the established network and involved citizens for any suggestions on improvements. Further, the public involvement process will be reviewed by FHWA and FTA during recertification of the FRUTS process to assure the process provides full and open access to the MPO decision making process. Prior to the adoption of or revision to the Participation Plan the public will be given 45 days to review and comment on the document. These comments will be addressed as stated under "Requirements of the Planning Process", above.

The public will have 30 days to comment on the draft of any proposed adoption, amendment or revision to other plans including, but not limited to, the Transportation Improvement Program (TIP), the FRUTS Long Range Transportation Plan (LRTP), the Conformity Determination Report (CDR), and The Bicycle and Pedestrian Plan (BPP), prepared by means of the FRUTS process before the Transportation Policy Committee takes action on it. If the TPC determines that a final plan differs significantly from the draft which was made available for public comment by the MPO, and raises new material issues which interested parties could not have reasonably foreseen, an additional 15 days for public comment on the final document shall be made available.

The LRTP has been revised at least every four-years beginning in 2008. The BPP is a component of the overall LRTP. Amendments to the LRTP may be brought to the Transportation Policy Committee at any time but no action shall be taken on the amendment until such time as the Technical Coordinating Committee and the Citizens Advisory Committee have reviewed and made recommendations on it.

Whenever the LRTP is revised, a CDR revision will be prepared to ensure that the LRTP conforms to federal air quality standards. Amendments to the CDR may be brought to the Transportation Policy Committee at any time but no action shall be taken on the amendment until such time as the Technical Coordinating Committee and the Citizens Advisory Committee have reviewed and made recommendations on it.

The TIP will be updated annually and will, at a minimum, list those projects and programs that are scheduled to occur within the FRUTS boundary area over the next four years. Amendments to the TIP may be brought to the TPC at any time but no action shall be taken on the amendment until such time as the TCC and the CAC have reviewed and made recommendations on it. Preparation of each TIP would potentially trigger the need to revise both the LRTP and the CDR.

At least one hearing/meeting will be provided the public during the comment period to provide additional opportunity for input.

### Public Access and Assistance

Location of Materials:

1. The Rome – Floyd Planning Dept. @ 607 Broad St. (the Carnegie Building)
2. The Floyd County Clerks Office @ 5 Government Plaza, Suite 124
3. The Rome City Clerks Office @ 601 Broad St.
4. The Cave Spring Clerks Office @ 10 Georgia Ave.
5. The Rome – Floyd County Library @ 205 Riverside Parkway.
6. Online at [www.romefloyd.com](http://www.romefloyd.com).

### Inquiries

Citizens or citizen groups may request information or action on a specific transportation project in the TIP, LRTP, or the BPP. Citizens are encouraged to write or call the transportation planner, or contact a member of the various FRUTS committees with their concerns and comments.

Citizens are also invited to attend the CAC meetings if they so desire.

## Response to Comments Received

In accordance with the federal regulations, when significant public input is received on draft documents as a result of the public involvement process, a summary, analysis, or report on the content of the comments and the responses shall be prepared and made part of the final document and shall be copied to those commenting if possible.

## Rome Transit Department Public Hearing Requirements

Rome Transit Department (RTD) shall solicit and consider public comments prior to implementing a transit fare increase, and /or any major service reduction in transit service in the maner provided herein.

The following service changes require a public hearing process followed by review and action by the RTD Board of Directors:

### *Major Service Reduction*

A major service reduction to RTD transit operations is defined as:

- Establishment of a new bus route and the intial schedule and headway parameters for that route
- Significant deviations in the geographical path traversed by any routes, which may impact 25% of the existing average daily ridership or could be considered out the corridor of direct service
- A substantial geographic alteration (one mile radius or more) in the termini of any route
- Elimination of a bus service not under the demonstration project status
- Modification to or increase in fare charged to the public for transit services

Notification of service changes as well as a transcript of the public hearing held will be provided to the Georgia Department of Transportation Office of Intermodal summarizing the issues and responses received in the public hearing process with any transit fare increase, and/or any major service reduce in transit services.

## Agency Consultation and Coordination

*MAP requires that MPOs “shall consult, as appropriate with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of a long-range transportation plan,” and that this consultation “shall involve, as appropriate, comparison of transportation plans with State conservation plans or maps, if available, or comparison of transportation plans to inventories of natural or historic resources, if available.*

*In addition the Secretary shall encourage each MPO to consult with officials responsible for other types for planning activities that are affected by transportation in the area including State and local planned growth, economic development, environmental protection, airport operations, and freight movement.”*

To meet consultation and coordination requirements listed above, FRUTS will provide the agencies listed in Attachment A reasonable opportunities to review and provide comments on draft documents including the TIP, the LRTP, the CDR, the BBP and the PP. Draft copies of transportation plans will be compared with conservation plans or maps and natural or historic resources if available and when appropriate. The agencies listed in Attachment A were identified during the “Agency Consultation Process” recently initiated by the GDOT.

In addition, FRUTS will continued to coordinate with local, regional and State agencies responsible for economic development, planned growth, airport and freight movement as we have since the inception of our planning efforts in the late early 1970s.

## Environmental Mitigation

*MAP 21 requires as well that planning documents include a discussion of the types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the [transportation] plan and that these planning-level discussions be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies.*

To comply with these requirements, FRUTS will afford the agencies listed in Attachment A the opportunity to actively participate during the LRTP/CDR development process. In addition, general information will be sent to them on major planning and corridor studies. The goal of these activities will be to facilitate dialogue and identify potential environmental mitigation activities early in the development of long-range transportation plans.

## Resolution

Insert resolution here

Attachment A – Agencies

Category	Agency	Address	Phone
Transportation	Coosa Valley Regional Development Center	1 Jackson Hill Drive NE Rome, GA 30161	706-295-6485
	Federal Highway Administration Georgia Division	61 Forsyth St., S.W. Ste. 17T100 Atlanta, GA 30303	404-562-3639
	Federal Transit Administration - Region IV	61 Forsyth St., S.W. Ste. 17T50 Atlanta, GA 30303	404-562-3500
	Georgia Department of Transportation – District Six Engineer	P.O. Box 10 Cartersville, GA 30120	770-387-3602
	Georgia Department of Transportation – Division of Construction	Room 134 No. 2 Capitol Square Atlanta, GA 30334	404-657-5810
	Georgia Department of Transportation – Division of Operations	Atlanta, GA 30316	404-656-5214
	Georgia Department of Transportation – Division of Preconstruction	2 Capitol Square, S.W. Atlanta, GA 30334	404-656-5187
	Georgia Department of Transportation – Division of Transportation Planning, Data and Inter-modal Development	2 Capitol Square, S.W. Atlanta, GA 30334	404-656-0610
	Georgia Department of Transportation – Office of Inter-modal Programs	276 Memorial Drive, SW Atlanta, GA 30303	404-651-9200
	Georgia Department of Transportation – Office of Planning	2 Capitol Square, S.W. Atlanta, GA 30334	404-656-5411

	Georgia Department of Transportation – Rome Area Engineer	P.O. Box 10 Cartersville, GA 30120-0010	706-295-6025
	Georgia Department of Transportation – Adopt-A-Highway Program	935 Confederate Ave. Bldg. 24 Atlanta, GA 30316	404-635-8223
	Norfolk Southern Corporation	Three Commercial Place Norfolk, Va. 23510-9227	757-629-2600
	Richard B. Russell Regional Airport	304 Russell Field Road Rome, GA 30165	706-295-7835
	Rome-Floyd County Chamber of Commerce	1 Riverside Parkway NE Rome, GA 30161	706-291-7663
<b>Agriculture, Forestry, and Fisheries</b>	Natural Resources Conservation Service – Rome Service Center	1401 Dean Street Ste I Rome , GA 30161-6494	706-291-5651
	Georgia Forestry Commission – Floyd County; District 1 Office	141 Wilshire Rd. Rome , GA 30161	706-295-6020
	Georgia Department of Natural Resources – WRD Fisheries Section Region 1 (NW Georgia)	312 N. River Street NW P.O. Box 519 Calhoun GA 30701	706-624-1161
<b>Floodplain</b>	Federal Emergency Management Agency	500 C Street SW Washington, D.C. 20472	800-621-FEMA
	Georgia Emergency Management Agency	P.O. Box 18055 Atlanta, GA 30316-005	404-818-6600

	U.S. Army Engineer District, Mobile	P.O. Box 2288 Mobile, AL 36628-0001	251-471-5966
	Georgia Forestry Commission – Floyd County; District 1 Office	141 Wilshire Rd. Rome , GA 30161	706-295-6020
<b>Historic / Archaeological Resources</b>	Georgia Department of Natural Resources – Historic Preservation Division	34 Peachtree Street, NW - Suite 1600 Atlanta, GA 30303	404-656-2840
	Georgia Department of Natural Resources – State Parks and Historic Sights	2 Martin Luther King Jr. Dr. Suite 1352 East Tower Atlanta, GA 30334	404-656-2770
	National Park Service – Southeast Region	100 Alabama St. SW - 1924 Building Atlanta, GA 30303	404-562-3100
	National Park Service – US Department of the Interior	1849 C Street NW Washington, DC 20240	202-208-6843
<b>Navigable Waters</b>	U.S. Army Engineer District, Mobile	P.O. Box 2288 Mobile, AL 36628-0001	251-471-5966
<b>Parks / Recreation / Natural Areas</b>	Georgia Department of Natural Resources – State Parks and Historic Sights	2 Martin Luther King Jr. Dr. Suite 1352 East Atlanta, GA 30334	404-656-2770
	National Park Service – Southeast Region	100 Alabama St. SW 1924 Building Atlanta, GA 30303	404-562-3100
	National Park Service – US Department of the Interior	1849 C Street NW Washington, DC 20240	202-208-6843

<b>Pollution</b>	Georgia Department of Natural Resources – Environmental Protection Division	2 Martin Luther King Jr. Dr.  Suite 1352 East Tower  Atlanta, GA 30334	404-657-5947
	Georgia Department of Natural Resources – Pollution Prevention Assistance Division	7 Martin Luther King Jr. Drive  Suite 450  Atlanta, GA 30334	404-651-5120
<b>Rare, Threatened, &amp; Endangered Species</b>	Georgia Department of Natural Resources – Non-game Animals and Plants	Nongame Program  116 Rum Creek Drive  Forsyth, GA 31029	478-994-1438
	National Park Service –  Southeast Region	100 Alabama St. SW  1924 Building  Atlanta, GA 30303	404-562-3100
<b>Wetlands</b>	Georgia Department of Natural Resources – Environmental Protection Division	2 Martin Luther King Jr. Dr.  Suite 1352 East Tower  Atlanta, GA 30334	404-657-5947
	U.S. Army Engineer District, Mobile	P.O. Box 2288  Mobile, AL 36628-0001	251-471-5966
	Natural Resources Conservation Service –  Rome Service Center	1401 Dean Street Ste I  Rome , GA 30161-6494	706-291-5651

# **Appendix G**

## **Language Assistance Plan (LAP)**

## Language Assistance Plan (LAP)

### Introduction

As the Metropolitan Planning Agency for Rome and Floyd County, the Rome-Floyd County Planning Department is responsible for an on-going, cooperative and comprehensive transportation/transit planning process. The Rome Transit Department (RTD) is responsible for planning and implementing the operations of the public transit system. Both agencies rely on federal and state funding assistance and are, therefore, required to prepare and follow a plan to ensure that individuals with Limited English Proficiency (LEP) can meaningfully access programs, services, and activities. Limited English Proficiency individuals may have a limited ability to read, write, speak or understand English. In Rome and Floyd County, as in the United States as a whole, most LEP individuals speak Spanish.

The intent of this LEP Plan is to ensure that both the MPO and the RTD are operating in compliance with Title VI. To that end, the Plan will follow the U.S. DOT Guidelines published in 2005, which state:

*“The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient’s entire program or activity, i.e., to all parts of a recipient’s operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation – not just the particular highway program or project – are covered by the DOT guidance.”*

### Legal Basis

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. Title VI states 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.

Lau v. Nichols, U. S. Supreme Court Case, 414 U.S. 563 (1974). Title VI prohibits conduct that has a disproportionate effect of LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” reprinted at 65 FR 50121 (August 16, 2000) by President William Jefferson Clinton. Directs Federal agencies to develop and implement a system so LEP persons can meaningfully access services. Instructs Federal agencies to publish guidance for their respective recipients to fulfill obligations to LEP persons under Title VI. Recipients must take “reasonable steps”.

U.S. Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to limited English Proficient (LEP) Persons, DOT LEP Guidance, Federal Register Vol. 70, no. 239, pp. 74087-74100 (December 14, 2005). The guidelines require recipients to take “responsible steps” to ensure access to

benefits, services, information, and other important portions of programs and activities to individuals who are Limited English Proficient (LEP).

**LEP Assessment**

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

The Rome – Floyd County MPO’s planning area includes all of Floyd County, including the incorporated cities of Cave Spring and Rome. Data from the American Community Survey 5-Year Estimates, 2008-2012 shows that the language spoken by the majority of residents is English (9.2%). Of the non-English speakers, 5.5% speak Spanish or Spanish Creole. Although many other languages are represented, none account for even half a percent of the total population.

**Language Spoken at Home**

Language	Number	Percent
Population 5 years and over	89,743	100
Speak only English	77,950	90.2
Speak a language other than English	6,574	9.8
Spanish or Spanish Creole	7,363	8.2
Other Indo-European languages	737	0.8
Asian and Pacific Island languages	616	0.7
Other languages	120	0.1

**Source: American Community Survey 5-Year Estimates, 2008-2012**

Federal DOT guidance indicates that LEP persons identify themselves as speaking English less than “very well”. Data from the Census Bureau’s American Community Survey indicates that while 6.4 percent of the population in Floyd County spoke Spanish in their homes, only 4 percent considered themselves to speak English less than “very well”. Persons who spoke a language at home other than English or Spanish accounted for approximately 2.1 percent of the population, and fewer than half of them considered themselves to speak English less than “very well”.

### Language Spoken at Home

<b>Population 5 years and over</b>	<b>88,065</b>	<b>88,065</b>
English only	80,538	91.50%
Language other than English	7,527	8.50%
Speak English less than "very well"	4,150	4.70%
Spanish	5,612	6.40%
Speak English less than "very well"	3,518	4.00%
Other Indo-European languages	991	1.10%
Speak English less than "very well"	161	0.20%
Asian and Pacific Islander languages	842	1.00%
Speak English less than "very well"	460	0.50%
Other languages	82	0.10%
Speak English less than "very well"	11	0.00%

Source: Selected Social Characteristics in the United States: 2006-2008 Data Set, American Community Survey

#### September 2013 Update

Based on American Factfinder data for 2011, 90.3 percent of Floyd County's population speaks English only at home while 9.7 percent speak a language other than English. Of those, 4.9 percent say they speak English less than very well. 7.9 percent of Floyd County's population speaks Spanish at home, and 4.2 percent of those say they speak English less than very well. 1.9 percent of Floyd County's population speak a language other than English or Spanish at home, and 0.6 of those say they speak English less than well.

#### Factor 2: The frequency with which LEP individuals come in contact with the MPO

The MPO has received no requests to translate the major transportation planning documents – Long Range Transportation Plan, Transportation Improvement Plan, Unified Planning Work Program, Participation Plan, or Conformity Determination Report - into Spanish or any other non-English language. The MPO includes in its public notices an offer to provide an interpreter, and to date no requests have been made.

Annually, the MPO carries out one public input activity. In previous years, the activity was an event providing information on transportation facilities and services, and soliciting via questionnaire public input on transportation issues and priorities. At the event in 2009, Spanish speakers and Spanish language questionnaires were present. A few Spanish language questionnaires were received. In 2010 the activity was an on-line survey in English and Spanish. Of the 206 responses, none were in Spanish.

#### September 2013 Update

In 2012 the MPO carried out a bus ridership survey. The form was provided in both English and Spanish. Of the 100 responses, 4 were from Spanish speaking riders.

Factor 3: The nature and importance of the MPO, activity, or service provided by the MPO to the LEP community.

The Rome-Floyd County Planning Department is the Metropolitan Planning Organization for transportation throughout Floyd County. It uses state and federal funding to plan for transportation and does not provide any direct service or program to the public that involves vital, immediate, or emergency assistance; medical treatment; or services for basic needs such as food or shelter. Participation in planning activities (transportation fairs, public meetings, review of documents) does not require an application or interview.

The MPO maintains a Participation Plan which outlines the process used to provide an opportunity for all residents to have input into the transportation planning process.

It should be noted that the MPO carries out planning activities on the part of Rome Transit Department. Rome Transit Department includes Spanish speakers in its ridership, and provides Spanish language route, schedule, and fee information.

Factor 4: The resources available to the MPO and overall costs

The MPO has a small LEP population (less than 10%), and historically the contact between LEP persons and the MPO has been low. Translation of major transportation planning documents would be expensive, has not been requested to date, and is likely not warranted at this time. However, should population counts show that the size of the Spanish population has grown significantly, translation of major documents may be necessary to ensure that residents who wish to participate are able to do so.

## **LEP Implementation Plan**

### Safe Harbor Stipulation

Federal law has provided a "safe harbor" for translation of written materials. The guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance. For example, if an MPO finds that written translation of major documents into languages other than English would be burdensome beyond the justifiable objectives of the program they are not required to do so. This provision does not apply to the requirement to provide reasonable and meaningful access to the process by LEP individuals through oral translation where such service is needed and reasonable.

The transportation planning process in Floyd County does not use vital documents as defined by federal law which states: "A document will be considered vital if it contains information that is critical for

obtaining federal services and/or benefits, or is required by law” (Federal Register, January 22, 2001, volume 66, Number 14).

#### Identifying persons who may need language assistance

At meetings and events with the goal of presenting information to the public and/or soliciting input from the public the MPO will attempt to have a Spanish speaker present at the sign-in table to determine whether attendees can speak and understand English. U.S. Census Bureau “I speak” cards will be used to identify persons who speak a language other than English or Spanish.

#### Language Assistance Measures

If the MPO receives a request for assistance in a language other than English, it is likely that a translator can be found from the ranks of City or Rome or Floyd County staff. For events, the MPO would engage staff or contact a local immigrant assistance organization for translation service. The MPO could also use Language Line Services, a telephone translation service. There are internet translation services available in a wide array of languages as well.

#### MPO Staff Training

Staff members will receive training in LEP procedures. All staff will be asked to keep a record of language assistance requests that will be used to assess future needs and to revise the LEP plan if the county’s population shows significant changes in immigration trends.

#### Providing Notice to LEP Persons

The MPO will provide notice in English and Spanish of all public meetings in accordance with its Participation Plan. The notice will include a provision that with prior notification the MPO will make every effort to obtain the services of an oral interpreter.

#### Monitoring and Updating the LEP Plan

Monitoring population characteristics and demographic trends will provide the basis for periodic updating of the LEP Plan. Federal DOT guidance suggests that the following parameters be used in updating the LEP Plan:

- ✓ How many LEP individuals were encountered in the course of the transportation planning process?
- ✓ Were their needs met, and how?
- ✓ What is current LEP population within the planning area?
- ✓ Has there been a change in the languages spoken by the LEP population?
- ✓ Is there a continuing need for assistance in a language previously identified and addressed in the LEP Plan?
- ✓ Does the MPO have more or fewer resources available to provide language assistance?
- ✓ Have the goals of the LEP Plan been attainable?
- ✓ Were complaints received?

Availability of the LEP Plan

Copies of the LEP Plan will be posted on the MPO's website at [www.romefloyd.com](http://www.romefloyd.com). Copies will be provided to Georgia Department of Transportation Planning Department and Intermodal Program staff, Federal Highway Administration, and Federal Transit Administration. As necessary, contractors, consultants, or sub-recipients will be provided with a copy.

Requests for copies of the Plan, questions, or comments should be referred to:

Sue Hiller, Director  
Rome-Floyd County Planning Department  
P.O. Box 1433  
Rome, Georgia 30162  
(706) 236-5025  
shiller@romega.us

**Appendix H**

**Operating Area Language Data:**

**The Rome Transit Department**

**Service Area**

## Operating Area Language Data

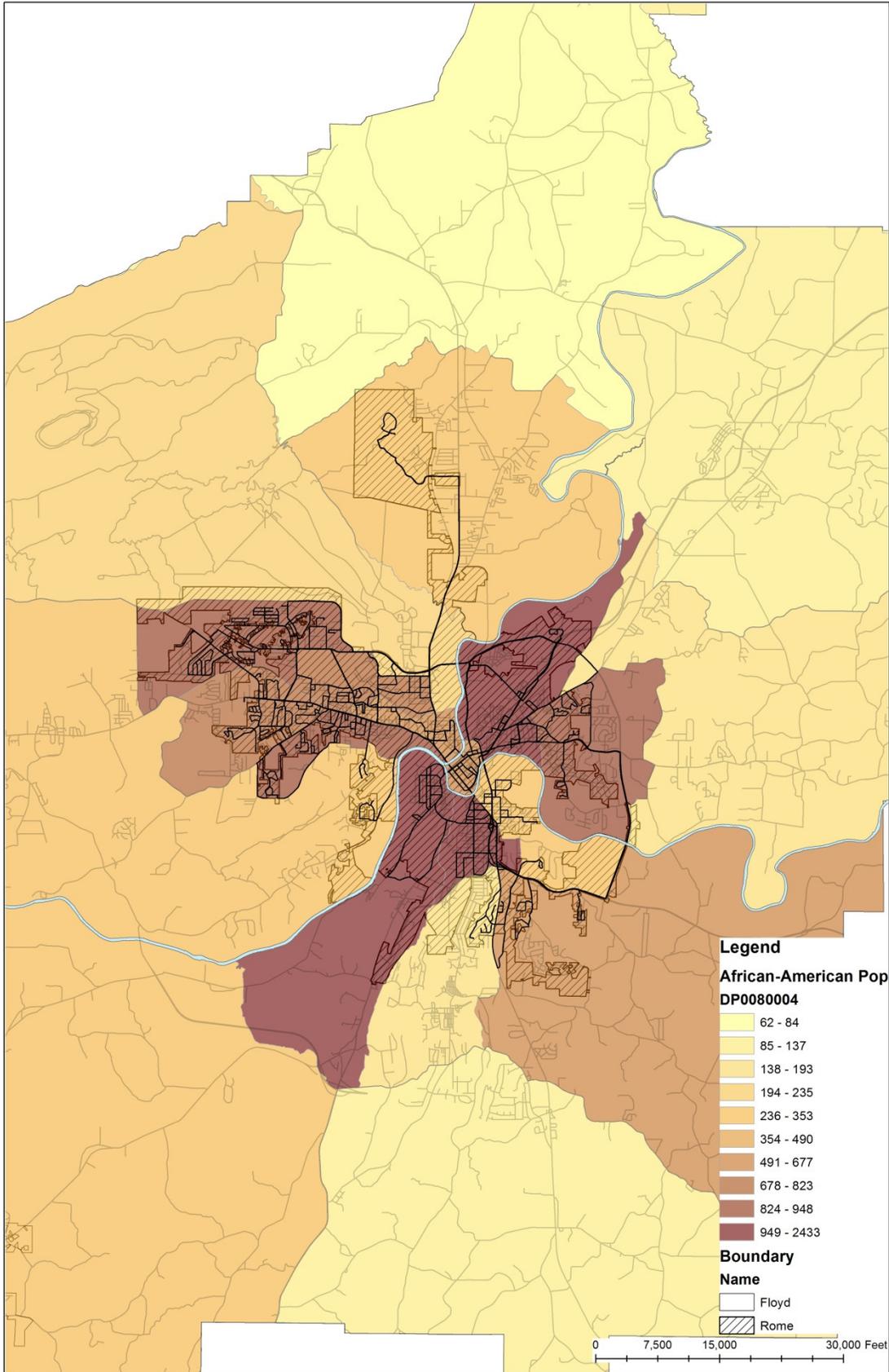
<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total	33,124	100%
Speak only English	27,547	83.1%
Spanish or Spanish Creole	4,930	14.9%
Speak English "very well"	1,857	5.6%
Speak English less than "very well"	3,073	9.2%
French (incl. Patois, Cajun)	15	0.0%
Speak English "very well"	15	0.0%
Speak English less than "very well"	0	0.0%
French Creole	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Italian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Portuguese or Portuguese Creole	35	0.0%
Speak English "very well"	35	0.0%
Speak English less than "very well"	0	0.0%
German	42	0.0%
Speak English "very well"	42	0.0%
Speak English less than "very well"	0	0.0%
Yiddish	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other West Germanic languages	10	0.0%
Speak English "very well"	10	0.0%
Speak English less than "very well"	0	0.0%
Scandinavian languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Greek	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Russian	16	0.0%
Speak English "very well"	16	0.0%
Speak English less than "very well"	0	0.0%
Polish	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Serbo-Croatian	0	0.0%

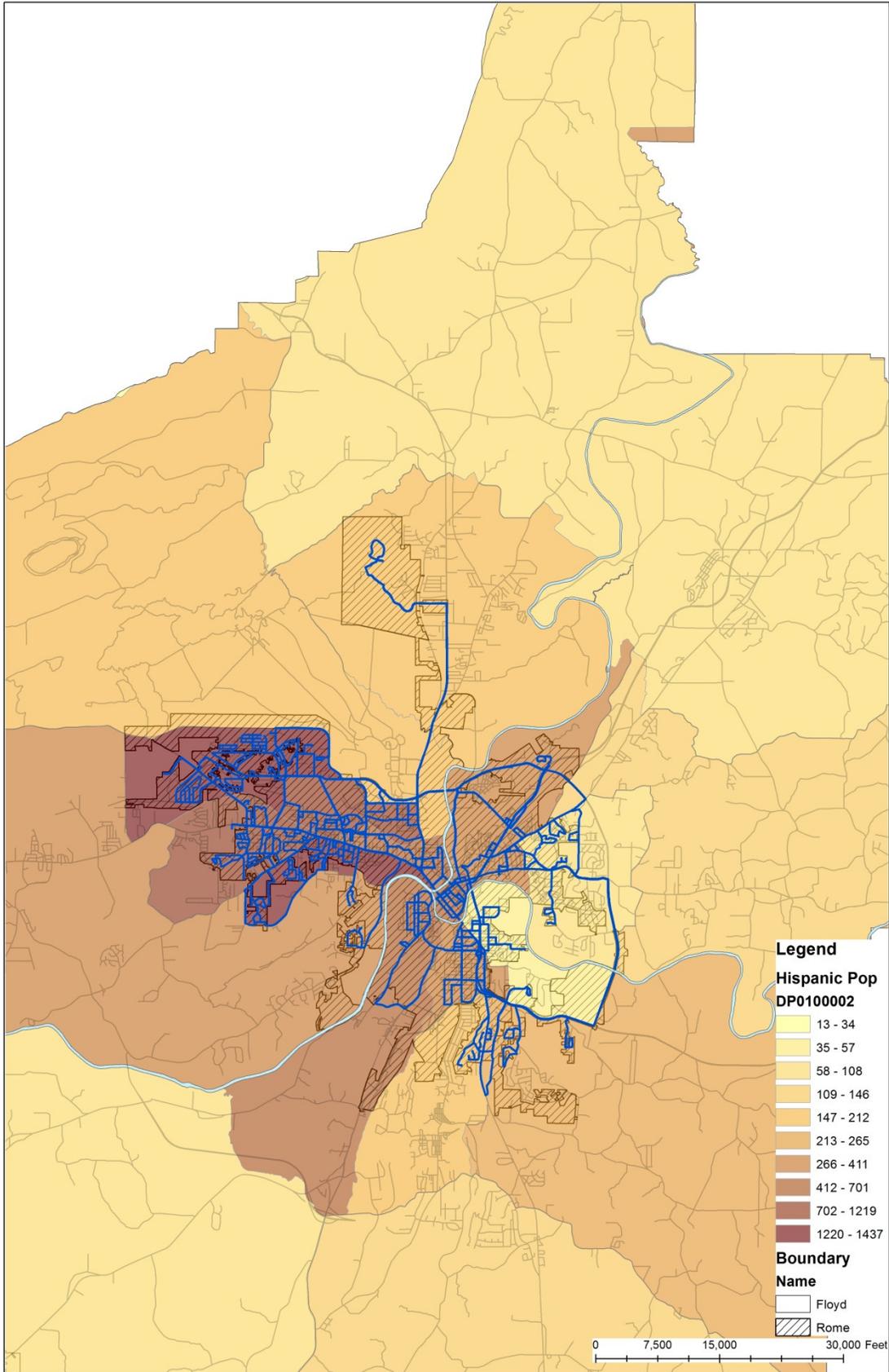
Language	County	Percent of Population
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Slavic Languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Armenian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Persian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Gujarati	152	0.45%
Speak English "very well"	79	0.23%
Speak English less than "very well"	73	0.22%
Hindi	19	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	19	0.0%
Urdu	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Indic languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Indo-European Languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Chinese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Japanese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Korean	13	0.0%
Speak English "very well"	13	0.0%
Speak English less than "very well"	0	0.0%
Mon-Khmer, Cambodian	17	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	17	0.0%
Hmong	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%

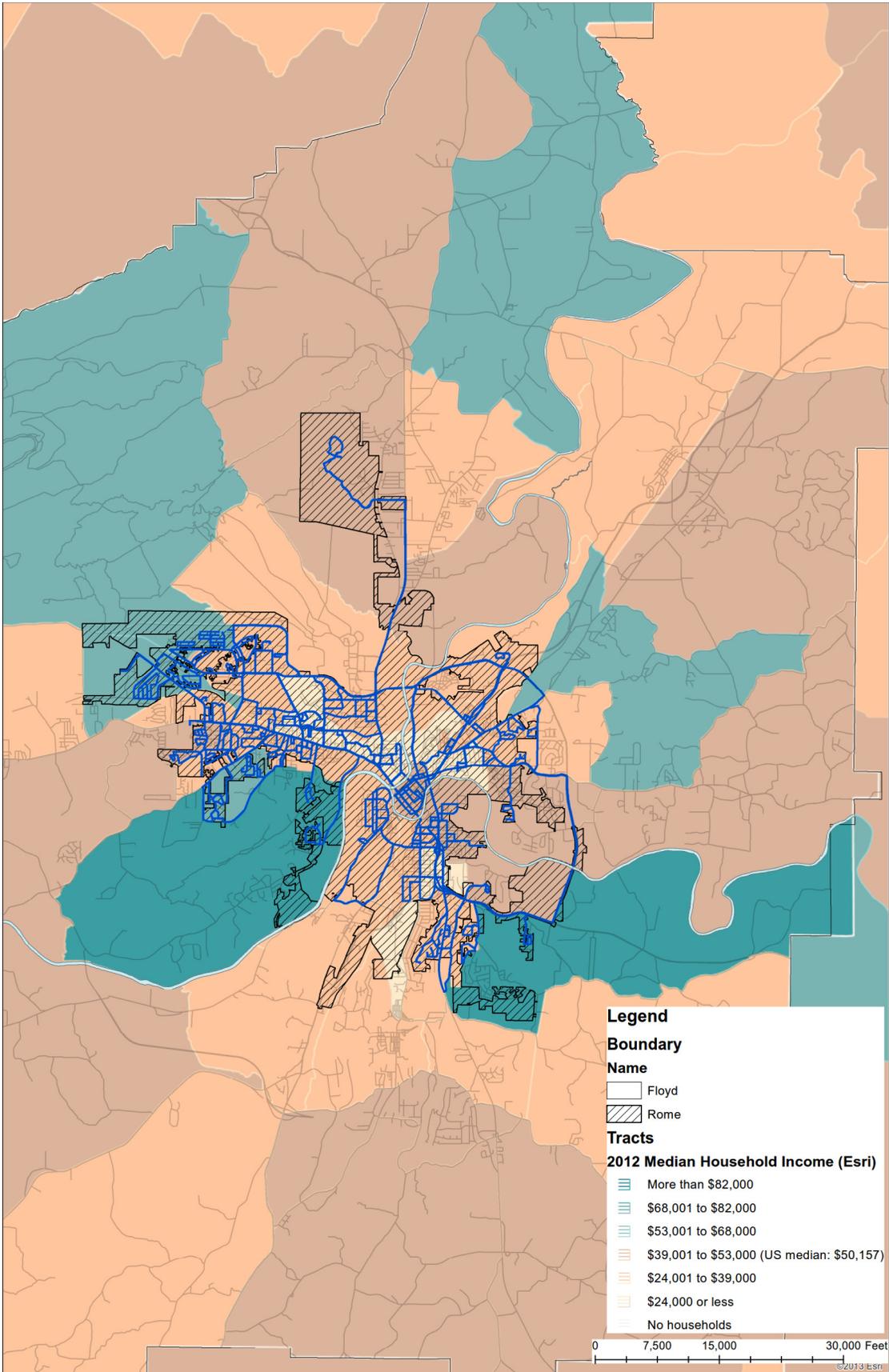
<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Thai	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Laotian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Vietnamese	189	0.57%
Speak English "very well"	78	0.23%
Speak English less than "very well"	111	0.34%
Other Asian languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Tagalog	73	0.0%
Speak English "very well"	56	0.0%
Speak English less than "very well"	17	0.0%
Other Pacific Island languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Navajo	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Native American languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Hungarian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Arabic	43	0.0%
Speak English "very well"	43	0.0%
Speak English less than "very well"	0	0.0%
Hebrew	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
African languages	23	0.0%
Speak English "very well"	23	0.0%
Speak English less than "very well"	0	0.0%
Other and unspecified languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%

# Appendix I

## Demographic Maps







# Appendix J

## Title VI Equity Analysis

The Rome Transit Department has not performed Title VI Equity Analysis.

# Appendix K

## Text Formatting Palette

## Formatting/Styles

Report margins:

Top margin = 1"

Bottom margin = 1"

Left margin = 1.25"

Right margin = .75"

Heading levels:

### **Heading One**

Calibri 14 pt bold; left-aligned; paragraph spacing = 10 pt after; line spacing multiple 1.15

### **Heading 2**

Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

Body Text: Calibri 11; fully-justified text; line spacing-multiple 1.15; 10 pt. after.

- Bulleted List: Calibri 10 pt; line spacing-multiple 1.15; paragraph spacing = 10 pt after

## General Instructions

How to Update Table of Contents:

Right click on table of contents and choose **update field**—you will then have the option of updating the entire table of contents or just the page numbers.

How to Add New Section:

Under **Page Layout Menu**, choose **Breaks**, then **Section Break**, then **Next Page**. Heading numbers should update automatically in new section.