

***Federal Transit Administration
Title VI Program***

**North Georgia Community Action, Inc. -
Mountain Area Transportation System**

August 21, 2024, Year of Plan Approval

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

The NGCA, Inc. - MATS Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval

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August 21, 2024
NGCA, Inc. Board of Directors Meeting

Vivian Chatman retired on June 28, 2024 as In Home Nutrition Aide in the Pickens County Sr. Life Services Department.

Glenda Birdley resigned on July 26, 2024 as a Bus Driver for the Murray County MATS Department.

This report presented by Chairman David Simmons. The Personnel Committee recommends approval of these staff changes by the full Board of Directors. Jane Dixon motioned to approve these staff changes as submitted. The motion was seconded by Becky Jolly and passed unanimously by the full board with no dissenting votes.

C. PROGRAM COMMITTEE.....Tommy Parker, Chairman

The Program Committee of the NGCA Board of Directors has met this Wednesday, August 21, 2024 during the regular bi-monthly meeting of the Board of Directors to place the following motion before the Board:

Motion #1: Approval of Updated Title VI Plan

Approval is needed by the full board for the Updated Title VI Plan as presented as per Guideline Standards by Marie Cline, CFO.

The Program Committee recommends approval of this Motion #1 Approval of the Updated Title VI Plan by the full Board of Directors.

The Program Committee recommends approval of this Motion #1 Approval of Updated Title VI Plan by the full Board of Directors. Eloise Gass motioned to approve Motion # 1 as submitted. The motion was seconded by Renee Turman and passed unanimously by the full board with no dissenting votes.

Motion #2: Approval of Strategic Plan 2024-2026

Approval is needed by the full board for the Strategic Plan 2024-2026 as presented as per Guideline Standards. A copy of full plan was emailed to each board member for review and a copy can be reviewed here today.

The Program Committee recommends approval of this Motion #2 Approval of the Strategic Plan 2024-2026 by the full Board of Directors.

The Program Committee recommends approval of this Motion #2 Approval of Strategic Plan 2024-2026 by the full Board of Directors. Becky Jolly motioned to approve Motion # 2 as submitted. The motion was seconded by Renee Turman and passed unanimously by the full board with no dissenting votes.

Section 2: Title VI Policy Statement

Policy Statement

North Georgia Community Action, Inc. – Mountain Area Transportation System (NGCA, Inc. – MATS), operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Georgia Department of Transportation (GDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and GDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. NGCA, Inc. - MATS operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

NGCA, Inc. - MATS

- NGCA, Inc. - MATS operates its 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 NGCA, Inc. - MATS.
- For more information on NGCA, Inc. - MATS's civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Ruth Ann Waters, MATS Program Manager, Title VI Coordinator
706-692-5644

Email: rwaters@ngcainc.com;

Or visit our administrative office at

1344 Talking Rock Road, Jasper, GA 30143

For more information, visit <https://www.ngcainc.com/our-projects/m.a.t.s-transportation>**www.ngcainc.com**

- For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
 - If information is needed in another language, contact **706-692-5644**.
 - Si se necesita información en otro idioma, comuníquese con 706-692-5644.

The **NGCA, Inc. - MATS** Notice to the Public is posted in the following locations:

1. MATS public offices
2. NGCA's website <https://www.ngcainc.com/our-projects/m.a.t.s-transportation>**www.ngcainc.com**
3. MATS transit vehicles

Sample Title VI Notice to the Public in Spanish

Notificación al Público de Derechos Bajo el Título VI

- NGCA, Inc. - MATS opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con NGCA, Inc. - MATS.
- Para obtener más información sobre el programa de derechos civiles o los obligaciones Título VI de NGCA, Inc. - MATS, o para obtener más información sobre los procedimientos para, o a presentar una queja, se pone en contacto con:

**Ruth Ann Waters, MATS Program Manager, Title VI Coordinator
706-692-5644**

Correo electrónico: rwaters@ngcainc.com;

O visite a nuestra oficina administrativa en:

1344 Talking Rock Road, Jasper, GA 30143

Para más información, visite a: <https://www.ngcainc.com/our-projects/m.a.t.s-transportationwww.ngcainc.com>

- Para asuntos de transporte relacionados con el Título VI, también se puede presentar una queja directamente ante la Oficina de Igualdad de Oportunidades en el Empleo (Oficina de EEO, en Inglés,) del GDOT: Title VI Liason, 600 West Peachtree Street N.W. Atlanta, Georgia 30308; vía telefónica: 404-631-1972; TTY: 711 o correo electrónico: civilrights@dot.ga.gov
- ~~For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov~~

o, a:

- Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Director East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 706-692-5644.

Section 4: Title VI Complaint Procedure

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by NGCA, Inc. - MATS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with NGCA, Inc. - MATS no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, NGCA, Inc. - MATS will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

NGCA, Inc. - MATS has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, the NGCA, Inc. - MATS may contact the complainant requesting further information. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, NGCA, Inc. - MATS can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal back to the agency. The complainant has seven (7) days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). The appeal process information will be included in the letter and available on NGCA, Inc's website at www.ngcainc.com.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

Ruth Ann Waters, MATS Program Manager, Title VI Coordinator
706-692-5644

Email: rwaters@ngcainc.com;

Or visit our administrative office at

1344 Talking Rock Road, Jasper, GA 30143.

For transportation-related Title VI matters, a complaint may also be filed directly with GDOT's Equal Employment Opportunity Office: Title VI Liaison, 600 West Peachtree Street N.W. Atlanta, GA 30308; via phone: 404-631-1972; TTY: 711 or email: civilrights@dot.ga.gov

Or

Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **706-692-5644**.

*Si necesita información en otro idioma, por favor llame **706-692-5644**.*

Procedimiento de Quejas de la Ley de Estadounidenses con Discapacidades ("ADA" por sus siglas en inglés)

Si tiene una queja sobre la accesibilidad de nuestro sistema o servicio de tránsito, o cree que tiene estado discriminado contra porque de su discapacidad se puede archivar una queja con Georgia del Norte Comunidad Acción Agencia, Nombre de usuario: Montaña Área Transporte Sistema (MATS). Proporcione todos los hechos y circunstancias relacionados con su problema o queja para que podamos investigar el incidente.

Presentar una queja:

Se puede archivar a escrito queja forma no más tarde que 180 días de el fecha de el presunto incidente.

Una queja debe presentarse por escrito en el formulario de quejas ADA de MATS y estar firmada por el denunciante o su representante, e incluir el nombre, la dirección y el número de teléfono de la queja, y explicar de la manera más completa posible los hechos y circunstancias que rodean la presunta discriminación. acción y nombre(s) de el individuo(s) responsable(s) para el presunto acción discriminatoria y el nombre y número de teléfono de cualquier testigos. Puede solicitar un formulario de queja escribiendo a North Georgia Community Action Agency, Inc., PO Box 760, Jasper, GA 30143, llamando a Ruth Ann Waters al 706-692-5623 o por correo electrónico a rwaters@ngcainc.com

Por favor envíe su formulario de queja completo a:

Ruth Ann Waters, Directora de la Programa de Transporte
North Georgia Community Action Agency
PO Box 760
Jasper, Georgia 30143

Asistencia:

Si necesita ayuda para completar un formulario de queja por escrito debido a una discapacidad o si necesita el formulario de queja en otro idioma, llame a Ruth Ann Waters al 706-692-5623 o envíe un correo electrónico a rwaters@ngcainc.com

¿Cómo se tramitará su reclamación?

Después a terminado queja forma es recibió, MATS voluntad revisar el queja a determinar si la queja es apropiada según la ADA, se aceptará si se cumplen los estándares de la ADA y se proporciona toda la información requerida. MATS puede comunicarse con el denunciante y los testigos si se necesita información adicional. necesario.

MATS voluntad responder en escribiendo a el querellante con es recomendaciones dentro 90 días de recibo de la queja.

Si el reclamante no está de acuerdo con las conclusiones, puede solicitar una reconsideración presentando una solicitud por escrito al Director del Programa de Transporte de MATS dentro de los 10 días posteriores a la fecha de la carta de MATS, indicando el motivo de la reconsideración. El director le notificará de el decisión cualquiera aceptando o rechazando el pedido para reconsideración dentro 10 días. En los casos en que se conceda la reconsideración, el director emitirá una carta de determinación al reclamante una vez finalizada la reconsideración revisar.

Opciones:

Si considera que MATS no ha resuelto satisfactoriamente su queja, puede presentar una queja ante:

Departamento de Transporte de Georgia (GDOT) 600 West Peachtree Street NW
Atlanta, GA 30308
404-631-1990

U.S. Department of Justice
Civil Rights Division
(División de Derechos Civiles del Departamento de Justicia de los Estados Unidos)
950 Pennsylvania Avenue, NW
4CON, 9th Floor
Washington, DC 20530

NGCA, Inc. - MATS Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		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 for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

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

Title VI: Race Color National Origin

Other (specify): _____

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 the 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 Civil Rights related complaint with this agency?	Yes	No
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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: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

If marked Yes in Section V, 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 or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

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

**NGCA, Inc. MATS
Ruth Ann Waters, MATS Program Manager (Title VI Coordinator)
1344 Talking Rock Road
Jasper, GA 30143
706-692-5644
rwaters@ngcainc.com**

**Formulario de queja del Título VI
Wisconsin Department of Transportation**

Sección I:

Nombre:

Dirección:

Teléfono (Domicilio): _____ **Teléfono (Trabajo):** _____

Dirección de correo electrónico:

¿Requisitos de formato de letra grande accesible?	<input type="checkbox"/> Sí <input type="checkbox"/> No	¿Cinta de audio?	<input type="checkbox"/> Sí <input type="checkbox"/> No
	TDT (TDD/TYY)	Otro	

Sección II:

¿Está presentando esta queja en su propio nombre? Sí* No

*Si respondió "sí" a esta pregunta, pase a la Sección III.

De lo contrario, proporcione el nombre y la relación de la persona por quien presenta la queja:

Explique por qué ha presentado una solicitud en nombre de un tercero:

Confirme que ha obtenido el permiso de la parte agraviada Sí No presenta la presentación en nombre de un tercero.

Sección III:

Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):

Título VI: Raza Color Origen Nacional

Otro (especifique): _____

Fecha de la presunta discriminación (mes, día, año): _____

Explique lo más claramente posible qué sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de las personas que lo discriminaron (si las conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.

Sección IV

¿Ha presentado anteriormente una queja relacionada con los derechos civiles ante esta agencia? Sí No

Sección V

¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?

Sí No

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal: _____

Tribunal Federal _____ Agencia Estatal _____

<input type="checkbox"/> Tribunal Estatal	<input type="checkbox"/> Agencia Local
Si marcó Sí en la Sección V, proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección VI	
Nombre de la agencia la queja es contra:	
Persona de contacto:	
Título:	
Número telefónico:	

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma y fecha requeridas a continuación

_____ Firma _____ Fecha

Envíe este formulario en persona a la dirección que aparece a continuación o envíelo por correo a:

NGCA, Inc. MATS
 Ruth Ann Waters, MATS Program Manager (Title VI Coordinator)
 1344 Talking Rock Road
 Jasper, GA 30143
 706-692-5644
 rwaters@ngcainc.com

Section 6: List of Title VI Investigations, Complaints and Lawsuits

The NGCA, Inc. - MATS maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

~~There have been investigations, complaints and/or lawsuits filed against us.~~
~~See list below. Attach additional information as needed.~~

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

NGCA, Inc. - MATS's *Public Involvement Philosophy*

NGCA, Inc. - MATS welcomes and values public involvement. GDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps NGCA, Inc. - MATS better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- NGCA, Inc. - MATS proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Implement a public involvement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Strategies and Desired Outcomes

To promote inclusive public participation, NGCA, Inc. - MATS will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats

- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, NGCA, Inc. - MATS has also employed these specific strategies or activities:

- Pamphlets and flyers specifically mentioning the MATS program and its services are distributed at least semi-annually throughout all service areas.
- Numerous community information events are attended that showcase MATS and its provided services, including the Gilmer County Health Fair and Fannin County Community Services Conference.
- Nondiscrimination Notice is posted in all transit vehicles.

Public Outreach Activities

The public outreach and involvement activities conducted by NGCA, Inc. - MATS since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	NGCA, Inc. - MATS Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Various	County Gov't	Notification of services	Pamphlet distribution	

Section 8: Four Factor Analysis and LEP Data

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

NGCA, Inc. - MATS will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by NGCA, Inc. - MATS

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

NGCA, Inc. - MATS service area encompasses five counties, Fannin, Gilmer, Gordon, Murray, and Pickens County, Georgia. Home to 178,304 people spread over 1746 square miles, the service area's population speaks 13 different language groups. However, the overall

numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 178,304, 6,626, or 3.72% of the population of residents, report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	Fannin County, Georgia	Gilmer County, Georgia	Gordon County, Georgia	Murray County, Georgia	Pickens County, Georgia	Total in Service Area	
Label	Estimate	Estimate	Estimate	Estimate	Estimate		
Total:	24,421	29,957	54,433	37,647	31,846	178,304	
Speak only English	23,608	27,009	45,548	33,244	30,875	160,284	89.89%
Speak Spanish and English less than "very well"	155	738	3,553	1,272	157	5,875	3.29%
Speak French, Haitian, or Cajun and English less than "very well"	0	0	0	0	13	13	0.01%
Speak German or other West Germanic languages and English less than "very well"	22	0	2	0	0	24	0.01%
Speak Russian, Polish, or other Slavic languages and English less than "very well"	0	0	0	6	0	6	0.00%
Speak Other Indo-European	0	36	117	168	0	321	0.18%

languages and English less than "very well"							
Speak Korean and English less than "very well"	20	0	14	0	0	34	0.02%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	0	24	35	0	0	59	0.03%
Speak Vietnamese and English less than "very well"	0	0	111	0	14	125	0.07%
Speak Tagalog (incl. Filipino) and English less than "very well"	0	0	0	0	15	15	0.01%
Speak Other Asian and Pacific Island languages and English less than "very well"	0	82	0	0	0	82	0.05%
Speak Arabic and English less than "very well"	0	0	0	0	0	-	0.00%
Speak Other and unspecified language and English less than "very well"	0	72	0	0	0	72	0.04%

						6,626	3.72%
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The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency’s requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Our service area is home to 5,875 people (3.29% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well, including French, German, Russian, Other Indo-European languages, Korean, Chinese, Vietnamese, Tagalog, Other Asian and Pacific Island languages, Arabic, or Other unspecified languages all comprise under 5% of the population each and under 1,000 people.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, NGCA, Inc. - MATS designates the following as Vital Documents which be translated to Spanish: Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Complaint Form, Reasonable Modification Request Form, ~~and, Paratransit Eligibility Form.~~

Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.

NGCA, Inc. - MATS recognizes the importance of taking measures to gauge LEP needs, but in the spirit of transparency, admits it has done less than planned in the past few years to fortify the Title VI Program. In this situation, our agency is doing all it can to move forward in a positive direction. This includes a plan to collect data on the frequency in which LEP persons come into contact with the agency's various departments and programs. The Title VI Coordinator will create an annual survey to be sent to each departmentcounty. (~~"Departments" includes drivers, dispatch, central office,and list any other departments or portions of your agency that may has contact with the public~~). DepartmentsCounties will collect data on their contacts with people who need language assistance, and the Title VI Coordinator will review and analyze this data each year. Departments-Counties will also be asked to log their use of any type of Language Line or any other translation or interpretation services. Thus, by the time this Program is due for an update, NGCA, Inc. - MATS will have concrete data on language access needs to help direct future efforts and planning.

Factor Three: The Importance of the Agency's Service to People's Lives

NGCA, Inc. - MATS services likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations. Some LEP persons are immigrants with no legal way to access a driver's license at this time.

Finally, NGCA, Inc. - MATS's planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that NGCA, Inc. - MATS has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, NGCA, Inc. - MATS staff members could utilize Google Translate or other technology-based translation services. In the event assistance in a rare language is needed, NGCA, Inc. - MATS can reach out to local colleges or universities to find staff who are proficient and may be willing to assist. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning an interpreter is needed.

Finally, NGCA, Inc. - MATS will pay for document translation services when needed, which generally costs about \$25-\$35 per page. For example, the Spanish translation of vital documents included in this Program were completed by a paid professional.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, NGCA, Inc. - MATS is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **NGCA, Inc. - MATS's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Results: LEP Populations Served

Item #1 – Four Factor Analysis Results: LEP Populations Served

The data above on pages 18-19 shows that just one language meets the Safe Harbor threshold—Spanish. Our service area is home to 5,875 people (3.29% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well, including French, German, Russian, Other Indo-European languages, Korean, Chinese, Vietnamese, Tagalog, Other Asian and Pacific Island languages, Arabic, or Other unspecified languages all comprise under 5% of the population each and under 1,000 people.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The NGCA, Inc. - MATS has identified, developed, and uses the following:

- a) Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Complaint Form, and Reasonable Modification Request Form ~~and, Paratransit Eligibility Form~~ will all be translated to Spanish.
- b) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- c) The NGCA, Inc. - MATS has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- d) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of NGCA, Inc. - MATS’s language assistance measures, NGCA, Inc. - MATS provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.
- The agency’s website includes language stating, “If you need assistance or information in another language, please contact 706-692-5644.” This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

NGCA, Inc. - MATS will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the NGCA, Inc. - MATS service area.

Updates will continue to include the following:

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- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether NGCA, Inc. - MATS's financial resources are sufficient to fund language assistance resources needed.
- Determine whether NGCA, Inc. - MATS has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning NGCA, Inc. - MATS's failure to meet the needs of LEP individuals

<p>Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons</p>

The following training will be provided to NGCA, Inc. - MATS staff:

- Information on the NGCA, Inc. - MATS Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñàunh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôïc Vieät Ngöõ.	Vietnamese
	당신이 한국어 말할 경우 이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 10: Minority Representation Information

NGCA, Inc. - MATS does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Section 12: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “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. Has the agency built a facility?

No, the agency has not built a facility.

Section 13: Fixed Route Transit Providers Service Standards and 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.

NGCA, Inc. - MATS:

- is a fixed route transit provider
- is **not** a fixed route transit provider