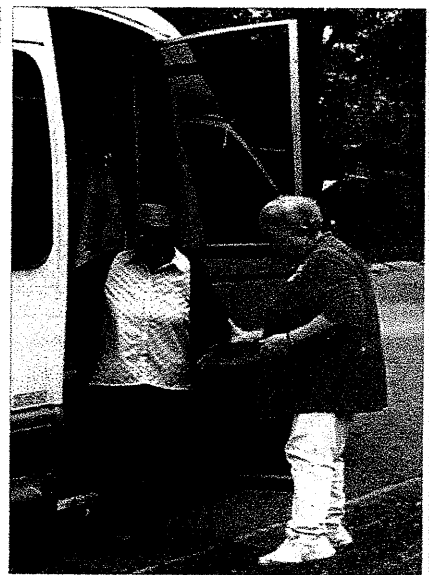


Bamberg County Office on Aging



Title VI Plan



Adopted: March 18, 2019

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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].

Bamberg County Office on Aging assures the South Carolina Department of Transportation (SCDOT) 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, and the Civil Rights Restoration Act of 1987 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Bamberg County Office on Aging 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 Bamberg County Office on Aging.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by SCDOT 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 primary recipients (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.

Signatures: _____

Printed Name: Kay Clary

Executive Director

Kim Kinard

Finance Director

Date

2.0 Introduction & Description of Services

Bamberg County Office on Aging 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.

Bamberg County Office on Aging is a sub-recipient of federal funds and provides service in Bamberg County, SC. A description of the current Bamberg County Office on Aging system is included in Appendix B.

Title VI Liaison

Ms. Kay Clary

Bamberg County Office on Aging

Executive Director

claryk@bellsouth.net

803-245-3021

PO Box 6

Bamberg, SC 29003

Alternate Title VI Contacts

Ms. Kim Kinard

Bamberg County Office on Aging

Finance Director

803-245-3021

PO Box 6

Bamberg, SC 29003

Bamberg County Office on Aging 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 SCDOT 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.

Bamberg County Office on Aging is not a first-time applicant for FTA/SCDOT funding.

2.2 Annual Certifications and Assurances

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.

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.

Bamberg County Office on Aging will remain in compliance with this requirement by annual submission of certifications and assurances as required by SCDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received SCDOT concurrence on April 11, 2019. The Plan was approved and adopted by Bamberg County Office on Aging Board of Directors during a meeting held on March 18, 2019. A copy of the meeting minutes and SCDOT concurrence letter is included in Appendix C of this plan.

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 Bamberg County Office on Aging' 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 Bamberg County Office on Aging' office(s) including the reception desk and meeting rooms, and on the Bamberg County Office on Aging' website at www.BambergSenior.org. Additionally, Bamberg County Office on Aging 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 along with any translated versions of the notice, as necessary.

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

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Bamberg County Office on Aging may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Bamberg County Office on Aging investigates complaints received no more than 180 days after the alleged incident. Bamberg County Office on Aging will process complaints that are complete.

Once the complaint is received, Bamberg County Office on Aging will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Bamberg County Office on Aging has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Bamberg County Office on Aging may contact the complainant. 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, Bamberg County Office on Aging can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two 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 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, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on Bamberg County Office on Aging's website www.bcooa.org.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Bamberg County Office on Aging' website www.bcooa.org

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (SCDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Bamberg County Office on Aging will submit updated Title VI Plans to SCDOT for concurrence 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 primary recipients, as needed.

4.4 Sub-recipient Assistance and Monitoring

Bamberg County Office on Aging has no sub-recipients.

4.5 Contractors and Subcontractors

Each contract you sign with a contractor (and each subcontract the prime contractor signs with a subcontractor) must include the following assurance:

The contractor, sub recipient or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-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 this contract or such other remedy as the recipient deems appropriate.

Contractors and subcontractors are responsible for complying with the Title VI Program of the recipient with whom they are contracting. Contractors are not required to prepare or submit Title VI Programs. Recipients are responsible for ensuring that contractors are following the Title VI Program and complying with Title VI.

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), Bamberg County Office on Aging 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 Bamberg County Office on Aging 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 SCDOT.

Bamberg County Office on Aging 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. Therefore, the summary for lists in Table 1 below has no data.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	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.				

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 Bamberg County Office on Aging 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 Bamberg County Office on Aging. The following is a list and short description of Bamberg County Office on Aging' recent, current, and planned outreach activities. 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 Bamberg County, SC 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

Bamberg County Office on Aging is required to submit a summary of public outreach efforts made over the last three (3) years.

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Employing different meeting sizes and formats;
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts;
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;

The outreach efforts over the past three (3) years includes, Bamberg County Office on Aging' staff members conducting outreach activities (directly to those client populations to whom we provide service as well as to community groups, professional associations, etc.) in various communities in our service areas and attend local government meetings. The purpose of these activities and presentations is to raise the level of awareness of the availability of our services and programs, and to engage with residents, governing bodies, and community groups about the needs of some in their communities and how best to address them. Bamberg County Office on Aging is committed to reaching and serving members of minority groups or under-represented populations. Each year, Bamberg County Office on Aging reviews demographic information on its clients, including new clients. The results of this review help guide Bamberg County Senior Services' future outreach efforts. As a nonprofit human services provider, Bamberg County Office on Aging seeks feedback on its mission services from clients and other members of the community. Bamberg County Office on Aging utilizes Advisory Committees and an engaged volunteer Board of Directors to assist us in evaluating and planning service design and implementation.

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).

Bamberg County Office on Aging operates a transit system within Bamberg County, SC. The Language Assistance Plan (LAP) has been prepared to address Bamberg County Office on Aging' 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 Bamberg County Office on Aging service area there are 4,354 residents or 2.8% who describe themselves as not able to communicate in English very well (Source: US Census). Bamberg County Office on Aging 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. Bamberg County Office on Aging 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.

Appendices

Appendix A

Reporting Requirements

Reporting Requirements

There are many types of recipients of Federal financial assistance: designated recipients, direct recipients, primary recipients and sub-recipients. The reporting and monitoring requirements vary depending on what role an entity serves. One entity could be all four types of recipients, and therefore have many different reporting and monitoring requirements.

Bamberg County Office on Aging will provide the following documentation to South Carolina Department of Transportation Office of Public Transit with their annual certifications and assurances as applicable and upon request:

- 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 if applicable, 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 if applicable, 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.
- 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.

Appendix B

Current System Description

Current System Description

1. Bamberg County Office on Aging (BCOA) is a public, non-profit organization that has been serving Bamberg County since 1975. We are the home of the Rhoad's Senior center and Bamberg County's Paratransit provider.
2. At the Bamberg C.O.A. we set ourselves to a high standard. You can expect a nice and courteous staff, highly skilled drivers, and clean and well-maintained facility and transportation vehicles.
3. A hot, nutritionally balanced meal can be delivered five days a week to home bound clients. Meals are available at the Rhoad's Senior Center in a fun group setting where exercise, crafts, devotionals, music, and nutrition and health education programs are also available.
4. Transportation to non-emergency medical appointments is provided for eligible participants (no age requirements). a 3-day notice is requested. Please call LogistiCare at 1-866-445-6860, a local public transportation program that provides access to non-Medicaid medical appointments, shopping, or work. Call the Bamberg County Office of Aging at 803-245-3021. The fee is \$2.00 for every 10 miles. Tickets are available at the Bamberg County C.O.A. office.
5. Most Bamberg County Handy Ride vehicles are accessible to people with disabilities. When making a reservation, please specify if you will require a wheelchair lift or other assistance.
6. The Bamberg County Handy Ride service is a co-operative effort of a variety of Bamberg County agencies and local service providers with major funding provided by Bamberg County, SCDOT Office of Public Transit and Medicaid.
7. Group Dining meals are provided five days a week at the Rhoads' Senior Center in a socially stimulating setting that includes a hot, nutritionally balanced meal, an exercise program, arts and crafts, devotionals, music, nutrition and health education programs. A person must be 60 years of age or older to sign up as the program is funded through the Older Americans Act. Various exercise classes are held throughout the year.
8. Our logo, "Wheels of Love" is unique to the agency and its service delivery. The wheels represent almost 100 volunteers who share their time and talents to help deliver meals or help daily at the congregate meal site. The hub of the wheel represents the agency, its staff, and the Advisory Board. The spokes represent all the different kinds of services provided to help us achieve our end products: independence, being able to remain in one's own home environment, and the ability to make decisions that affect one's own life. These products are the cornerstone of our services. Our services are only tools which help us reach our products.
9. A hot, nutritionally balanced meal can be delivered five days a week to home bound clients. Meals are available at the Rhoad's Senior Center in a fun group setting where exercise, crafts, devotionals, music, and nutrition and health education programs are also available.

Appendix C

Title VI Plan Adoption Meeting Minutes and SCDOT Concurrence Letter

BAMBERG COUNTY OFFICE ON AGING
ADVISORY BOARD MEETING MINUTES

MARCH 18, 2019

The Advisory Board of the Bamberg County Office on Aging met on March 18, 2019, at the Rhodes Senior Center. The following were present: Dale Bryant, Eula Hartwell, Hattie Williams, Carolyn Kinard, Kim Kinard and Kay Clary. Sandra Humphries, Samelle Porter and Nina Haynes were excused.

Eula Hartwell gave the Invocation.

Minutes were approved as read with a motion by Dale Bryant and seconded by Eula Hartwell.

Kim Kinard discussed the Statement of Operations. She stated last year DOT monies ran out for part of June and they didn't charge for transportation for the rest of the month. This year they anticipate money running out again but have decided to charge for anything non-medical to save some money.

Units should be at 67 percent. Some programs are under and transportation is over at 77 percent.

The exercise room is finished but has no equipment. They hope to get a grant to help provide some equipment. There have been numerous calls about exercise equipment.

The facility grant is finished which provided a new roof and new carpet in the building.

Two new sit-down classes have been added for the congregate meal program on Monday and Friday. Monday, Wednesday, and Friday there is an exercise program from 1:00 to 2:00 p.m.

Revenues tie into units. First Baptist Church of Denmark's R.A.s gave \$5,000 this year for home delivered meals program. What a blessing!!

Kim recognized the overages in salaries and fringe due to the overage in transportation being provided and other line items that tie into transportation. Gas and auto maintenance/repairs are up as well, along with supplies which includes paper used for transportation work.

The agency has more drivers now and all wear uniforms which increases uniform rentals.

The last payment on the PIP grant helped bring the agency in the black by \$65,260.

Kay stated the contract for 2 new vehicles was mailed today with no match required.

One vehicle has been ordered through the 5310 contract for 18-19. It takes 16 weeks or more to receive it. The agency is at its max for vehicles. The State will discontinue leasing lift vehicles in June. The lift vehicles we currently have we can keep until lifespan of vehicle.

5311 IT Grant provided new tablets, radios, computes and monitors for the vehicles. All monies for this grant were not used completely.

The agency provides approximately 160-200 trips a day for Medicaid and 100-170 a day for public transportation.

Two more drivers have been hired to help cut down on overtime. The agency now has 30 drivers and 26 vehicles.

Kay stated they had received policy and procedures for the Title VI Plan that needed to be approved by the board to be included in our policies and procedures. After some discussion, Ms. Eula made the motion to accept the policies as received and a second was made by Ms. Hattie. The motion carried.

The congregate program provided a trip to Charleston for a dinner cruise which was very much enjoyed by the seniors. Another trip is planned in May for senior day in Columbia at the fairgrounds put on by the State. They will have different vendors as well as health screenings.

There will also be a formal event on June 15 at Denmark Technical College which will be free for the seniors. This was enjoyed so much last year.

A date for the Volunteer Reception was discussed and decided on Friday, May 10, 2019, at the Rhodes' Senior Center.

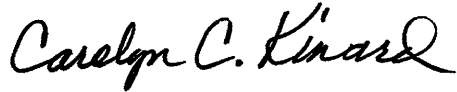
Kay passed out the budget for 2019-2020. She stated that she is not asking for raises for the new year. The budget will be voted on at the June meeting.

Kay discussed problems with drivers being late to work, late picking up clients, etc. She stated the transportation department employees met last week and they were told there would be 3 write-ups and then termination. The question was asked if employees were given this in writing and signed for their personnel files? Kay stated, "No, but she would see that was done."

Kay also passed out her evaluation information which will be done at the June meeting. Those not present would be mailed to them.

There being no further business the meeting was adjourned.

Respectfully Submitted,

A handwritten signature in black ink that reads "Carolyn C. Kinard". The signature is written in a cursive, flowing style.

Carolyn C. Kinard, Secretary



South Carolina
Department of Transportation

MEMORANDUM

TO: Curtis Sims
OPT Training, Safety and Security

FROM: Angela Page - Smith ^{A.S.}
Title VI Coordinator

DATE: April 11, 2019

RE: Title VI Compliance Review – Bamberg County Office on Aging

Thank you for submitting the requested information regarding the Office of Public Transit Compliance and Oversight Review of Bamberg County Office on Aging. I have reviewed the updated Title VI documentation submitted and deem the information sufficient.

I appreciate your continued commitment to the Title VI Program. If you have any questions, please contact me at 803-737-5095 or SmithA@scdot.org.

cc: File - Title VI



Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

TITLE VI NOTICE OF PROTECTIONS AGAINST DISCRIMINATION

Bamberg County Office on Aging operates its programs and services without regard to race, color and national origin. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Bamberg County Office on Aging

Individuals wishing to request and/or receive additional information on its discrimination obligations, including its complaint procedures, please contact the person listed below or visit the administrative office at the address listed below:

Kay Clary, Executive Director
Bamberg County Office on Aging
P.O. Box 6
Bamberg, SC 29003
www.bcooa.org
803-245-3021

Individuals wishing to file a discrimination complaint under Title VI, the written complaint must be filed to the address above within less than 180 days of the alleged discrimination. Written complaints may also be filed with the U. S. Department of Transportation/Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA, at the following address:

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

To accommodate limited English proficient individuals, oral complaints to be documented and/or translated may also be given at the above address.

Appendix E

Title VI Complaint Form

TITLE VI COMPLAINT FORM

SECTION I:		
Name:		
Address:		
Telephone (Home):		Telephone (Work):
Electronic Mail Address:		
Accessible Format	Large Print	Audio Tape
Requirements?	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):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year): _____		
<p>Explain as clearly as possible what happened and why you believe you were discriminated Against. Describe all persons who were involved. Include the name and contact information of the person/s who discriminated against you if known as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.</p> <hr/> <hr/>		

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, of local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____		
<input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____		
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:

Kay Clary, Executive Director
 Bamberg County Office on Aging
 PO Box 6
 Bamberg, SC 29003
 803-245-3021
claryk@bellsouth.net

Appendix F

Public Participation Plan

TITLE VI
PUBLIC PARTICIPATION PLAN

Bamberg County Office on Aging



Ms. Kay Clary

Bamberg County Office on Aging Executive Director

PO Box 6

Bamberg, SC 29003

803-245-3021

Every three years, on a date determined by South Carolina Department of Transportation (SCDOT), each subrecipient is required to submit the following plan as part of their Title VI Program.

Below you will find an outline of the Title VI Public Participation Plan, as required by USDOT Federal Transit Administration. This document explicitly describes the proactive strategies, procedures, and desired outcomes for the Bamberg County Office on Aging' public participation activities.

Bamberg County Office on Aging will work to achieve its public participation goal cooperatively with other public agencies and units of government by coordinating efforts when possible. It will coordinate particularly with the Region's counties, cities, villages, and towns, and the South Carolina Department of Transportation.

Bamberg County Office on Aging will seek to provide timely notices of important steps in planning, free and open access, and multiple means of participation within the Region in a number of ways.

The components of public participation will include:

- Open Meetings
- Advisory Committee Meetings
- Public Meetings and Comment Periods
- Targeted Format and Frequency
- Broad Notification
- Convenient Scheduling
- Website Updates
- Document Availability and Notification
- Ensuring Environmental Justice in Planning
- Engaging Minority Populations, Low-Income Populations, and People with Disabilities
- Environmental Justice Task Force
- Public Outreach and Briefings
- Incorporation of Public Input
- Evaluation of Public Participation

Open Meetings

Meetings of the Administrative Advisory Board and its advisory committees are open to the public.

Agendas are posted on Bamberg County Office on Aging website and any affiliated offices at least five days in advance.

Locations accessible by public transit are considered desirable and will be used for committee and public meetings if practical, especially for transportation planning, depending upon the subject matter and expected audience.

People needing disability-related accommodations are encouraged to participate, and reasonable accommodations will be made upon request. All locations will comply with the Americans with Disabilities Act of 1990.

Appendix G

Language Assistance Plan

LIMITED ENGLISH PROFICIENCY PLAN

Bamberg County Office on Aging

I. INTRODUCTION

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. The purpose of this Limited English Proficiency Plan is to outline the responsibilities of Bamberg County Office on Aging in regards to Limited English Proficient (LEP) persons and establish a process for providing assistance to LEP persons for Bamberg County Office on Aging programs, activities, and services pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

Title VI of the Civil Rights Act of 1964

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

Executive Order 13166

Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 *"Improving Access to Services for Persons With Limited English Proficiency,"* directs each Federal agency that is subject to the requirements of Title VI of the Civil Rights Act of 1964 to publish guidance for its respective recipients and sub-recipients clarifying that obligation. The U.S. Department of Transportation (USDOT) published policy guidance on December 14, 2005 to clarify the responsibilities of recipients of Federal financial assistance from the USDOT.

Plan Summary

Bamberg County Office on Aging staff has developed this Limited English Proficiency Plan (LEP) to provide language assistance for LEP persons seeking meaningful access to Bamberg County Office on Aging programs as required by Executive Order 13166 and USDOT's policy guidance. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, and guidelines to notify LEP persons that assistance is available. In developing the Bamberg County Office on Aging LEP Plan, the Bamberg County Office on Aging staff undertook a USDOT Four-Factor LEP analysis, which considers the following:

The number or proportion of LEP persons eligible to be served or likely to be encountered by Bamberg County Office on Aging programs, activities, or services. The frequency with which LEP individuals come in contact with Bamberg County Office on Aging programs, activities, or services; The nature and importance of the program, activity or services provided by Bamberg County Office on Aging to the LEP population; and the resources available to Bamberg County Office on Aging and overall cost to provide LEP assistance.

Four Factor Analysis

FACTOR 1: Number or proportion of LEP persons eligible to be served or likely to encounter Bamberg County Office on Aging programs, activities, or services.

In order to determine the number of LEP persons, the Bamberg County Office on Aging collected various data from the US Census Bureau. This data was used to evaluate whether certain language groups met the Safe Harbor clause of the LEP guidance, whether a language LEP group exceeds 5% of the County's population, or have a minimum threshold of 1000 LEP persons in a certain language. Using the Demographic Profile Date of Census 2010, the LEP population was ascertained. Based on the population, 2.8% or 4,354 of the Bamberg County, SC population is deemed an LEP person of Hispanic descent. The remaining LEP population that did not speak English well or Spanish, were within general language categories such as Indo- European and Asian & Pacific Islander languages. This categorization does not prove helpful in targeting specific language assistance to our LEP populations.

FACTOR 2: Frequency with which LEP individuals come in contact with Bamberg County Office on Aging programs, activities, or services.

Bamberg County Office on Aging will assess the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying public meeting attendees. No previous LEP requests have been received thus far. Documentation of LEP requests will be done annually upon implementation of the LEP plan.

FACTOR 3: Nature and importance of the program, activity or service provided by Bamberg County Office on Aging to the LEP population.

To assess the nature and importance of the programs, activities, and services provided by Bamberg County Office on Aging to LEP and general community, Bamberg County Office on Aging conducts an internal and external review:

Internal Review

Internally, Bamberg County Office on Aging staff evaluated programs and services based on Bamberg County Office on Aging' function as one entity responsible for transportation planning in Bamberg County, SC the potential public interest, and the impact upon the quality of life of the public by Bamberg County Office on Aging functions. Per evaluation of Bamberg County Office on Aging programs, documents, and services, it was determined the following documents could be seen as vital documents:

- Coordinated Public Transit-Human Services Transportation Plan
- State of South Carolina Human Services Coordination Plan
- Public Participation Plan

Based on this evaluation and the language assessment in Factor 1 of the Four Factor analysis, the staff will seek partner organizations proficient in Spanish to provide information about Bamberg County Office on Aging plans and programs. Transportation and/or interpretation services, for Spanish and other languages, will be considered upon request and in coordination with partner agencies in the county. If any notice or document bears a direct impact toward a localized population that meets or exceeds the LEP Safe Harbor clause, then

the notice or document will be considered for translation to include translating notices and key information contained within vital documents.

External Review

Externally, a public outreach effort within the identified language communities will be conducted. Community groups that work with the Spanish population will be outreached for their input. In this outreach, the Bamberg County Office on Aging staff will provide community groups a synopsis of what the primary purpose and functions of the Bamberg County Office on Aging System and ask what key issues, programs, services, are and activities they perceive are critical. These will be noted in the transportation planning process and sent forward to the agency and/or locality as applicable.

FACTOR 4: Resources available to the Bamberg County Office on Aging and overall costs to provide LEP assistance.

Bamberg County Office on Aging assessment for available resources is an ongoing activity. Initially, volunteer staff of translators and interpreters will be identified.

HOW TO IDENTIFY AN LEP PERSON WHO NEEDS LANGUAGE ASSISTANCE

The following Bamberg County Office on Aging documents will be available in Spanish:

- Bamberg County Office on Aging brochures.
- Nondiscrimination Complaint Form.
- Additional translation and/or interpretation services will be considered upon request and in coordination with partner agencies in the county.

STAFF TRAINING

All Bamberg County Office on Aging staff will be provided access to the LEP Plan and will be offered training on procedures and services available. Training topics will include:

- Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.
- LEP program responsibilities and obligations.
- Language assistance services offered.
- Use of LEP Language Assistance Cards ("*I Speak Cards*").
- Documentation of language assistance requests.

PROVIDING NOTICE TO AVAILABLE LANGUAGE SERVICE TO LEP PERSONS

Signs should be posted that language assistance is available in public areas such as at Bamberg County Office on Aging reception area, conference room, waiting areas, and Bamberg County Office on Aging website.

Outreach Techniques

If Bamberg County Office on Aging staff knows that they will be presenting a topic in a geographic location with a known concentration of LEP persons, Bamberg County Office on Aging staff will make a concerted effort to have meeting notices, fliers, advertisements, or agendas printed in the alternative language. As well, Bamberg County Office on Aging staff will coordinate with local community groups to have someone available who can help interpret information at the meeting.

When running a general public meeting notice in a geographic location that could be of potential importance to LEP persons or if staff will be hosting a meeting or a workshop, Bamberg County Office on Aging staff will, to the extent possible, insert the following clause: "An interpreter will be available" in the predominant language. Bamberg County Office on Aging staff will seek to coordinate with local community groups to have someone available who can help interpret information at the meeting.

Coordination with local community groups is a key outreach component as Bamberg County Office on Aging staff identifies and seeks to engage LEP person in Bamberg County Office on Aging programs and activities.

MONITORING AND UPDATING THE LEP PLAN

Bamberg County Office on Aging will follow the Title VI Program monitoring and reporting schedule for the LEP Plan. Reports will address the following questions:

- How many LEP persons were encountered?
- What is the current LEP population in Bamberg County, SC?
- Has there been a change in the languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Bamberg County Office on Aging programs? Are there other programs that should be included?
- Have Bamberg County Office on Aging resources available, such as technology, staff, and financial costs changed?

DISSEMINATION OF THE BAMBERG COUNTY OFFICE ON AGING LIMITED ENGLISH PROFICIENCY PLAN

Bamberg County Office on Aging staff will post the LEP Plan on its website at www.BambergSenior.org. Any person with Internet access will be able to view the plan. Copies of the LEP Plan will also be provided to the Bamberg County Office on Aging member jurisdictions and interested parties upon request.

Appendix H

Operating area Language Data: Bamberg County Office on Aging Service Area

Subject	Bamberg County, South Carolina											
	Total		Percent		Percent of specified language speakers							
					Speak English only or		Percent speak English		Speak English less than		Percent speak English	
	Estimate	Margin of	Estimate	Margin of	Estimate	Margin of	Estimate	Margin of	Estimate	Margin of	Estimate	Margin of
Population 5 years and over	14,272	*****	(X)	(X)	14,135	+/-139	99.0%	+/-1.0	137	+/-139	1.0%	+/-1.0
Speak only English	14,005	+/-151	98.1%	+/-1.1	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	267	+/-152	1.9%	+/-1.1	130	+/-61	48.7%	+/-29.3	137	+/-139	51.3%	+/-29.3
SPEAK A LANGUAGE OTHER THAN												
Spanish	176	+/-127	1.2%	+/-0.9	55	+/-33	31.3%	+/-30.6	121	+/-128	68.8%	+/-30.6
5 to 17 years old	8	+/-9	0.1%	+/-0.1	8	+/-9	100.0%	+/-100.0	0	+/-19	0.0%	+/-100.0
18 to 64 years old	168	+/-128	1.2%	+/-0.9	47	+/-30	28.0%	+/-28.7	121	+/-128	72.0%	+/-28.7
65 years old and over	0	+/-19	0.0%	+/-0.2	0	+/-19	-	**	0	+/-19	-	**
Other Indo-European languages	57	+/-44	0.4%	+/-0.3	51	+/-40	89.5%	+/-14.3	6	+/-9	10.5%	+/-14.3
5 to 17 years old	9	+/-18	0.1%	+/-0.1	9	+/-18	100.0%	+/-98.9	0	+/-19	0.0%	+/-98.9
18 to 64 years old	46	+/-37	0.3%	+/-0.3	40	+/-37	87.0%	+/-22.7	6	+/-9	13.0%	+/-22.7
65 years old and over	2	+/-5	0.0%	+/-0.1	2	+/-5	100.0%	+/-100.0	0	+/-19	0.0%	+/-100.0
Asian and Pacific Island languages	10	+/-18	0.1%	+/-0.1	0	+/-19	0.0%	+/-93.8	10	+/-18	100.0%	+/-93.8
5 to 17 years old	0	+/-19	0.0%	+/-0.2	0	+/-19	-	**	0	+/-19	-	**
18 to 64 years old	10	+/-18	0.1%	+/-0.1	0	+/-19	0.0%	+/-93.8	10	+/-18	100.0%	+/-93.8
65 years old and over	0	+/-19	0.0%	+/-0.2	0	+/-19	-	**	0	+/-19	-	**
Other languages	24	+/-39	0.2%	+/-0.3	24	+/-39	100.0%	+/-60.5	0	+/-19	0.0%	+/-60.5
5 to 17 years old	0	+/-19	0.0%	+/-0.2	0	+/-19	-	**	0	+/-19	-	**
18 to 64 years old	0	+/-19	0.0%	+/-0.2	0	+/-19	-	**	0	+/-19	-	**
65 years old and over	24	+/-39	0.2%	+/-0.3	24	+/-39	100.0%	+/-60.5	0	+/-19	0.0%	+/-60.5
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	11,854	+/-128	(X)	(X)	11,832	+/-141	99.8%	+/-0.2	22	+/-26	0.2%	+/-0.2
Speak only English	11,719	+/-142	98.9%	+/-0.5	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	135	+/-63	1.1%	+/-0.5	113	+/-60	83.7%	+/-19.3	22	+/-26	16.3%	+/-19.3
Spanish	53	+/-32	0.4%	+/-0.3	47	+/-30	88.7%	+/-25.7	6	+/-13	11.3%	+/-25.7
Other languages	82	+/-55	0.7%	+/-0.5	66	+/-52	80.5%	+/-26.4	16	+/-22	19.5%	+/-26.4

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to non-sampling error (for a discussion of non-sampling variability, see Accuracy of the Data). The effect of non-sampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates