

Rome Transit Department



Title VI Plan

Adopted - September 15, 2021



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
12/11/2014	Adopted	Kathy Shealy	
Sept 2016	Amended	Kathy Shealy	
Dec 2018	Updated	Kathy Shealy	
September 2021	Updated & Adopted	Kathy Shealy	

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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].

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

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

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

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

Signature: Kathy Shealy

Printed Name: Kathy Shealy, Rome Transit Department Director

Executive Director/Signatory Authority, Rome Transit Department, Date: June/30/2021

2.0 Introduction & Description of Services

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

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

Title VI Liaison

Kathy Shealy, Transit Director

Employed by: City of Rome Transit Department

706-236-4523

P.O. Box 1433 Rome, Georgia 30162-1433

Alternate Title VI Contact

Courtney Griffin, Assistant Transit Director

Employed by: City of Rome Transit Department

706-236-4523

P.O. Box 1433 Rome, Georgia 30162-1433

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

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, color, 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.

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

Current and Pending FTA Funding

1. Section 5307 Capital and Operating Grant – FY19 - \$1,545,128.00,
2. Section 5307 Capital and Operating Grant – Cares Grant FY20/FY21 - \$6,675,886.00 – Current

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.

3. Section 5307 Capital and Operating Grant – FY22 - \$1,918,846.00 - Current

Current and Pending GDOT Funding

1. Section 5307 Capital and Operating Grant – FY19 - \$74,391.00 - Current
2. Section 5307 Capital and Operating Grant – FY22 - \$139,500.00 – Current

Current and Pending Federal Funding (non-FTA)

1. None

Current and Pending State Funding (non-GDOT)

1. None

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

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual

certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

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

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on _____. The Plan was approved and adopted by the Transportation Policy Committee during a meeting held on _____. A copy of the meeting minutes and GDOT concurrence letter will be included in Appendix C of this Plan upon adoption. ***will attach new dates and adoption letter/meeting minutes when approved by the upcoming TPC meeting*

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

Customize the sample notice, as necessary. A sample of the notice is included in Appendix D of this Plan. The notice is 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 Rome Transit Department's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Rome Transit Department's office(s) including the reception desk and meeting rooms, and on the Rome Transit Department's website at <https://romefloyd.com/departments/transit-department>. Additionally, Rome Transit Department will post the notice at stations, stops and on transit vehicles.

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 Rome Transit Department may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Rome Transit Department investigates complaints received no more than 180 days after the alleged incident. Rome Transit Department will process complaints that are complete.

Once the complaint is received, Rome Transit Department 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.

Rome Transit Department has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Rome Transit Department 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, Rome Transit Department 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 Rome Transit Department website (<https://romefloyd.com/departments/transit-department>).

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Rome Transit Department's website (<https://romefloyd.com/departments/transit-department>).

4.3 Record Retention and Reporting Policy

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

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

4.4 Sub-recipient Assistance and Monitoring

[Rome Transit Department System does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Rome Transit Department utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Your Transit System has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.]

4.5 Sub recipients and Subcontractors

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

Nondiscrimination Clauses

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Rome Transit Department shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Rome Transit Department, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.



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

Rome Transit Department has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

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	N/A			
1.				
2.				
Lawsuits	N/A			
1.				
2.				
Complaints	N/A			
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 Rome Transit Department was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Rome Transit Department. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Rome Transit Department services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

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

- January 2018 - The transit's department's route supervisor presented at Highlands River, a community center that offers services to developmentally disabled and special needs citizens. The transit employee spoke to educate special needs citizens and staff of transit services.
- April 2018 - The transit's department's route supervisor attended the North Rome Community Action Committee to represent the transit department. This committee serves an underprivileged area of Rome, Georgia.
- August 2018 - The transit's department's route supervisor presented at West Rome Baptist Church's special needs ministry.
- September 2018 - The transit's department's route supervisor attended an event at Thankful Baptist Church to inform church members of transit services. Thankful Baptist Church serves an underprivileged area of Rome, Georgia.
- When RTD is considering a major change in fixed routes or an increase/decrease in fares, advertisements are posted in the local paper, information is posted at all transit stations, and made into a brochure and passed out to all riders. Along with holding a public hearing available to all citizens.
- RTD, along with the MPO hosts a Transportation Fair and Rider Appreciation Day every year. At these fairs there are routes schedules and fee brochures available in English and Spanish. There are also rider surveys that all riders are encouraged to complete. RTD and MPO offers a free lunch at these fairs to encourage citizen participation.

- Transit Staff spoke at Highland Rivers Health Peer Program in 2019
- Para-Transit staff presented at and attended Mercy Senior Care Alzheimer's Association Training in February 2019
- Due to COVID-19, all 2020 outreach events were cancelled.

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).

Rome Transit Department operates a transit system within the City of Rome. The Language Assistance Plan (LAP) has been prepared to address Rome Transit Department 's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Rome Transit Department service area there are 4,253 residents or 4.6% who describe themselves as not able to communicate in English very well (Source: US Census Data, 2019 American Community Survey) Rome Transit Department is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Rome Transit Department has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

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

Rome Transit Department’s Transit/Traffic/Public Works, CAC, TCC, and TPC consists of 2 members appointed by The City of Rome.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population	62.5%	15.5%	27.2%	3.1%	0.2%	1.1%
CAC	%85	%5	%10	%0	%0	%0

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

9.0 Title VI Equity Analysis

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

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

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

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

10.0 System-Wide Service Standards and Service Policies

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

Rome Transit Department is a fixed route service provider.

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

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

All service standards and service policies should be tailored to the services provided by your agency and policies you are comfortable enforcing. The service standards may be shown in a table or paragraph format.

10.1 Service Standards

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

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
< 30' Para-Transit Bus	16	3	19	1.6
< 30'	24	4	28	1.4
30' Low Floor Bus	22	4	26	1.5

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
WEEKDAY	Peak	Base	Evening	Night

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

c. On-Time Performance

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

d. Service Availability

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

10.2 Service Policies

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

a. Distribution of Transit Amenities

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

b. Vehicle Assignment

All City of Rome Transit Department Vehicles are housed at the main office at 168 North Avenue, Rome, Georgia 30162. Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. All buses are equipped with Automated Voice Announcement systems, wheelchair accessible, and both internal and external cameras. Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses. Typically, up to 30' buses are used for mainline fixed routes and para-transit routes.

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

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

General Requirements

All recipients must submit:

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

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

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

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

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

Appendix B

Current System Description

Current System Description

An overview of the organization including its mission, program goals and objectives.

The City of Rome Transit Department's System current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to city residents. Our Mission Statement states the following: "To provide professional, safe and effective public transportation, increase ridership, and keep operating cost to a minimum.

Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

The City of Rome Transit System is a non-profit 501(c)(3)] organization. Our organization is made up of thirty-five (35) full-time employees. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to the Public Service Manager. We have Public Services/Transit Committee Board made up of a Board of City Commissioners (BCC). Our BCC is committed to this program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in the City of Rome's Personnel Policies for fiscal year 2018, (page 9). We currently operate from 5:40 to 6:30 daily service hours averaging 11.17 total fleet service hours per day assuming 250 operating days.

Indicate if your agency is a government authority.

The City of Rome Transit Department operates under the local municipality.

Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

The City of Rome Transit System's Director is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 4-6 weeks of in class and on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The City of Rome Transit Director is responsible for annual renewal of all liability insurance for agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Directors responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

Who provides vehicle maintenance and record keeping?

Maintenance on all agency vehicles is provided by the City of Rome transit garage personnel. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 168 North Avenue, Rome, GA, and are maintained by the Shop Supervisor]. All records are maintained and retained for a minimum of four (4) years.

Number of current transportation related employees

Our transportation department has a total of 48 (forty-eight) employees that include: 20 (twenty) full-time drivers, 11 (eleven) administrative/support staff and 3 (three) garage operators.

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

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

A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to customers. Our service incorporates Fixed Route and Para-Transit Services. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes buses. 54 (fifty-four) of our vehicles and all are equipped for wheelchair service. We utilize our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at the City of Rome Transit department garage and record the appropriate age and mileage of all vehicles.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

MINUTES

Rome-Floyd County Metropolitan Planning Organization

Transportation Policy Committee

Carnegie Training Room

September 15, 2021

10:00 a.m.

In Attendance: Kayla Schaaf, Transportation Planner; Artagus Newell, Rome/Floyd MPO; Julie Smith, CAC Member; Michael Skeen, Floyd County; Chris Jenkins; City of Rome Public Works; Kathy Shealy, RTD.

Voting Members: Kim Grayson, GDOT Planning (via Zoom); Bruce Ivey, Floyd County Commission; Mark Cochran, City Commissioner; Bonny Askew, City Commissioner; Sammy Rich, City of Rome; Jamie McCord, Floyd County.

- I. Call to Order. The meeting was called to order at 10:18 a.m.
- II. Reports
 - a. City of Rome. – Jenkins reported for the City of Rome. He reported the city received their 2021 LMIG money (approximately \$440,000). W. 9th paving is complete(2020 paving project) The City is now starting 2021 paving projects.
 - b. Floyd County. – Skeen reported for the County. He reported the county received completely 60% of the 2021 paving list. Booger Hollow will be open by the end of the year. Blacks Bluff is closed due to safety issues. He also reported new signs will be installed on 30 miles of county roads.
 - c. City of Cave Spring. – No report.
 - d. Metropolitan Planning Organization. – Schaaf reported for the MPO.
 - i. 2022 UPWP Adoption – Schaaf reported the TCC made a motion to recommend adoption of the 2022 UPWP to the policy committee. Rich made a motion to adopt. Cochran seconded. With there being no opposition, the motion carried.
 - ii. Title VI Plan Adoption - Schaaf reported the TCC made a motion to recommend adoption of the updated Title VI Plan to the policy committee. Cochran made a motion to adopt. Rich seconded. With there being no opposition, the motion carried.
 - iii. Public Transportation Agency Safety Plan (PTASP) Adoption - Schaaf reported the TCC made a motion to recommend adoption of the updated Public Transportation Agency Safety Plan to the policy committee. Cochran made a motion to adopt. Rich seconded. With there being no opposition, the motion carried.
 - e. Rome Transit Department. – Shealy reported for RTD. She reported the City is going to offer free transit fares the rest of the year, starting on Georgia cities week. October 4th.

RTD is still working on selling the Tripper buses. And RTD will soon be receiving new 2019 buses from Gainesville.

- f. Georgia Department of Transportation. - No report.
 - g. Federal Highway Authority. – No report.
 - h. Other Business. No report.
 - i. Next Meeting: November 17, 2021, 10 a.m.
- III. Adjournment. There being no further business, the meeting adjourned at 10:41 a.m.

RESOLUTION BY THE ROME-FLOYD COUNTY METROPOLITAN PLANNING ORGANIZATION TRANSPORTATION POLICY COMMITTEE

WHEREAS, federal regulations require that the Title VI plan be annually reviewed and updated and,

WHEREAS, the Rome-Floyd County Metropolitan Planning Organization in coordination with the Federal Transit Administration and the Georgia Department of Transportation have reviewed the Title VI plan,

WHEREAS, the Technical Coordinating Committee at its September 7th, 2021 meeting recommended the approval of the Title VI plan for the City of Rome Transit Department in concurrence with the Rome-Floyd County Metropolitan Planning Organization.

NOW, THEREFORE BE IT RESOLVED that the Rome-Floyd County Metropolitan Planning Organization concurs with the recommendation of the Technical Coordination Committee of the Rome-Floyd County Metropolitan Planning Organization to approve the Title VI plan.

CERTIFICATION

I hereby Certify that the above is true and correct copy of a Resolution adopted by the City of Rome Transportation Policy Committee, at their meeting held on September 15th 2021.


Bonny Askew

Policy Committee Chairperson

9-15-21
Date



Russell R. McMurry, P.E., Commissioner
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308
(404) 631-1990 Main Office

August 23, 2021

Kathy Shealy, Transit Director
Rome Transit Department
168 North Ave
P.O. 1433
Rome, GA 30161

Dear Ms. Shealy,

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ashley Finch, Rail/Transit Planner directly at afinch@dot.ga.gov or (470) 432-1751.

Sincerely,

Kaycee Mertz
Transit Program Manager
Division of Intermodal

Appendix D

Title VI Notice to Public

Notifying the Public of Rights Under Title VI

Rome Transit Department

Notifying the Public of Rights Under Title VI

The Rome Transit Department and the Metropolitan Planning Organization of Rome and Floyd County

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

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

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

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

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

As set forth in the Americans with Disabilities Act of 1992, the Rome City Government and the Floyd County Government do not discriminate on the basis of disability, and will assist citizens with special needs given proper notice (seven working days). As set forth in Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. To that end the City or Rome and Floyd County will make a reasonable effort to find translators, given proper notice (seven working days).

For more information or to obtain a Discrimination Complaint Form, please call (706)-236-5025 or e-mail Anewell@romea.us.

AVISO AL PUBLICO DE LOS DERECHOS BAJO EL TITULO VI

Departamento de Tránsito de Rome

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

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

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

Appendix E

Title VI Complaint Form

Appendix E: Title VI Complaint Form



**ROME - FLOYD COUNTY METROPOLITAN PLANNING ORGANIZATION (MPO)
TITLE VI COMPLAINT FORM**

Section I:

Name: _____

Address: _____

Telephone (home): _____ Telephone (work): _____

Electronic Mail Address: _____

Accessible Format Requirements:

Large Print: _____

TDD: _____

Audio Tape: _____

Other: _____

Section II:

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

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

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

Please explain why you have filed third

party _____

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

Section III:

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

Race _____ Color _____ National Origin _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of

any witnesses. If more space is needed, please use the back of this form.

Section IV:

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

Section V:

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

If Yes, check all that apply:

Federal Agency ____ State Agency ____ Federal Court ____

Local Agency ____ State Court ____

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Contact Person: _____

Title: _____

Telephone number: _____

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

Signature and date required below

Signature

Date

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

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

OR

Artagus Newell
Planning Director
Rome and Floyd County
607 Broad Street
Rome, Georgia 30161

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



**ROME - FLOYD COUNTY METROPOLITAN PLANNING ORGANIZATION (MPO)
FORMULARIO DE DENUNCIAS DEL TITULO VI**

Sección I:

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

Material Impreso:
TDD:
Cinta de Audio:
Otro:

Sección II:

Usted está llenando esta denuncia por su propia cuenta? *Si___ No___

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

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

Por favor explique por qué usted está presentando a un tercero

Por favor confirme que usted ha obtenido permiso de la parte ofendida si es que usted está llenando la forma en nombre de un tercero. Si ___ No___

Sección III:

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

Raza___ Color___ Origen Nacional___

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

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

Sección IV:

Usted ha presentado anteriormente un formulario de denuncias del Título VI con esta agencia?
Si ___ No ___

Sección V:

Usted ha presentado esta denuncia ante cualquier otra agencia Federal, Estatal ó Local, ó ante cualquier Corte Federal ó Estatal? Si ___ No ___
Si es "Si", Marque todas las que aplican:

Agencia Federal ___ Agencia Estatal ___ Corte Federal ___
Agencia Local ___ Corte Estatal ___

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

Nombre: _____ Dirección: _____

Título: _____ Teléfono: _____

Agencia: _____

Sección VI:

Nombre de la Agencia de la cual se está quejando: _____

Persona de Contacto: _____

Título: _____

Número Telefónico: _____

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

Firma y Fecha requerida abajo

Firma

Fecha



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

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

o

Artagus Newell
Director de Planeación
Rome y Condado de Floyd
607 Broad Street
Rome, Georgia 30161

Dirección de Correo Postal: P.O. Box 1433
Rome, Georgia 30161

Appendix F

Public Participation Plan (PPP)



Introduction

The Public Participation Plan (PPP) for Rome Transit Department was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Rome Transit Department. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Rome Transit Department services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Rome Transit Department also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Rome Transit Department and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Rome Transit Department will proactively reach out and engage low-income, minority, and LEP populations for the Rome Transit Department service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Rome Transit Department will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Rome Transit Department. Rome Transit Department intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Rome Transit Department will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Rome Transit Department website (<https://www.romefloyd.com/departments/transit-department>) and all feedback on the site will be recorded and passed on to Rome Transit Department management. The public will also be able to call the Rome Transit Department office at 706-236-4523 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Rome Transit Department management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing

priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Rome Transit Department will use a variety of means to make riders and citizens aware, including some or all of the following methods:



- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing

RTD is required to hold a public hearing with any fare or major route change.

LCB Meeting

Citizen’s Advisory Committee (CAC), Technical Coordinating Committee (TCC), Transportation Policy Committee (TPC) meet every other month. (January, March, May, July, September, November)

ROME/FLOYD COUNTY METROPOLITAN PLANNING ORGANIZATION



Sept 23, 2020

PUBLIC PARTICIPATION PLAN

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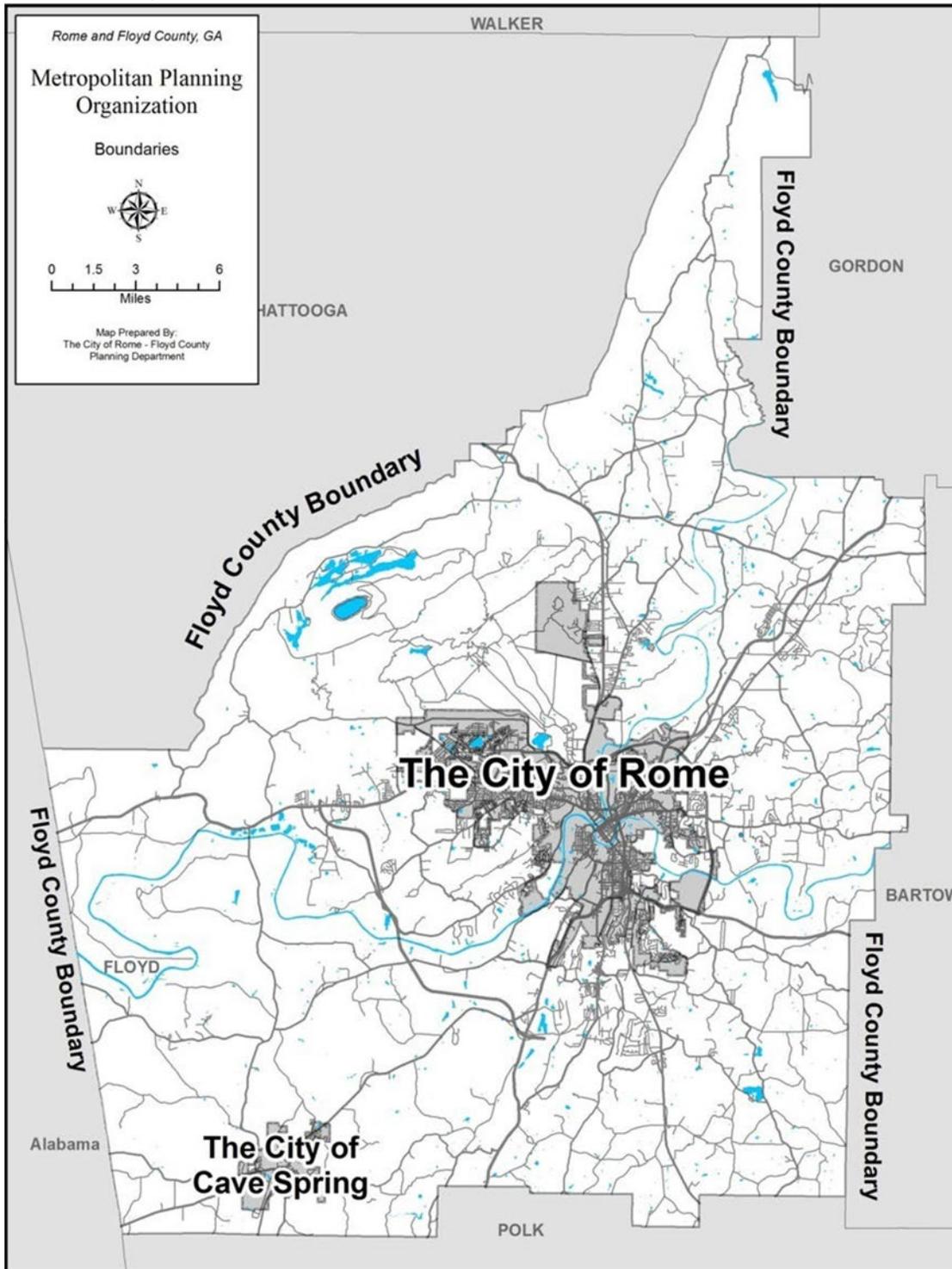
SECTION I: INTRODUCTION

In accordance with 23 CFR 450.316, the Rome/Floyd County Metropolitan Planning Organization is required to engage in a metropolitan planning process that creates opportunities for public involvement, participation, and consultation throughout the development of the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP). Under this requirement, the Rome/Floyd County MPO must allow for:

- Adequate public notice of public activities
- Review and comment at key decision points in the development of the MTP and TIP
- Multiple, accessible participation formats, including electronic and in-person
- Seeking out and considering the needs of those traditionally underserved

The Rome/Floyd County MPO should develop a collaborative and comprehensive public participation plan, in full collaboration with the public and stakeholder communities, to be used in the development of the MTP and TIP, as well as to frame the strategies for public and stakeholder communication and collaboration in all phases of the planning process. The participation plan itself must be prepared by MPO staff with a 45-day public review and comment period.

Rome/Floyd MPO BOUNDARY



SECTION II: PURPOSE OF PARTICIPATION PLAN

The Participation Plan is required by law under the Fixing America's Surface Transportation Act (FAST Act) which underscores the need for public involvement. It requires metropolitan planning agencies such as the Rome/Floyd MPO to provide a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled and other interested parties with a reasonable opportunity to respond to key transportation issues that affect the Floyd County region.

The MPO in coordination with local governments, local transportation agencies, the Georgia Department of Transportation (GDOT), Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) conducts the transportation planning process. The FAST Act has not changed the existing Metropolitan Planning Organization (MPO) planning goals or the process of administering federal planning funds to the MPOs. Under the FAST Act these planning factors remain unchanged. The ten (10) planning factors are as follows: (23 USC 134)

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

Among the specific areas identified by the Rome/Floyd County MPO, the state and federal government to consider in designing this process include:

1. Transportation planning process shall include a proactive participation process that provides complete information and involvement in developing plans and programs to be distributed to local and state agencies.
2. Requires a minimum 45 days public review and comment period before the participation process is initially adopted or revised.
3. Must provide timely information to segments of community affected by plans, programs, and projects.

4. Provide reasonable public access to information used in development of plans and TIPS; and provide open public meetings where matters related to federal-aid highway and transit are considered.
5. Provide adequate public notice of public involvement activities, including but not limited to plans and TIPS.
6. Demonstrate consideration of and response to public input.
7. Seek out and consider needs of the traditionally under-served, including but not limited to low-income and minority households.
8. When significant comments on the draft transportation plan or TIP are received, a summary, analysis, and report on the disposition of comments shall be made part of the final plan and TIP and shall be copied to these commenters.
9. Significant revisions of the plan or TIP will require an additional period of public review.
10. The participation process will be periodically reviewed by the MPO for effectiveness in providing full and open access.
11. The participation process will be reviewed by FHWA and FTA to assure the process provides full and open access to the decision-making process.
12. The metropolitan participation plan process shall be coordinated with the statewide participation plan process when possible.

The following sections illustrate efforts to incorporate a proactive participation process into the MPO planning process and general responsibilities. Citizens, stakeholders, federal, state, and local partners, and committee members are given ample opportunity to participate in this process. The public involvement process for the Metropolitan Transportation Plan (MTP), Transportation Improvement Program (TIP), Public Participation Plan (PPP), and Special Studies are used to satisfy the Georgia Department of Transportation's public participation process for the Program of Projects (POP). This includes such specific areas as updates to the Rome/Floyd County MPO transportation plan and the MTP, TIP, PPP, and Special Studies.

SECTION III: PARTICIPATION PLAN PROCESS FOR THE TRANSPORTATION PLAN

The committees/agencies listed below each provide a venue for public comment and participation throughout the planning process. These committees/agencies are as follows:

Transportation Policy Committee (TPC)

The Rome/Floyd Policy Committee consists of elected officials and staff representing the jurisdictions, transportation providers and other significant interests in the MPO area. The Policy Committee is responsible for review and approval of goals, objectives, plans, and projects developed by the MPO.

Citizens Advisory Committee (CAC)

The Citizen's Advisory Committee shall advise MPO Policy Committee on matters of public opinion from individual citizens and citizen groups regarding planned changes to the Rome-Floyd Area Transportation Plan, and study findings and recommendations.

Technical Coordinating Committee (TCC)

The Technical Coordinating Committee (TCC) consists of transportation planners, engineers, and transit providers representing local, regional, and state agencies. The TCC shall coordinate all technical activities in the transportation planning process. The TCC shall provide information on the process of the study to both the Policy Committee and the Citizen's Advisory Committee.

Other Agencies

State/Federal/Local

U.S. Department of Transportation

A Comprehensive, Cooperative, and Continuing process is required for initiatives to be eligible for Federal transportation funding. USDOT works with local and state officials to ensure that the 3C planning process as required by the FAST Act which stipulates that a cooperative, comprehensive, and continuing planning process be carried out.

Georgia Department of Transportation (GDOT)

Responsible for the coordination of the state aspects of any studies, assist in the preparation of analytical techniques as well as play a major role in the development and utilization of computer models for the study.

Planning & Development

Responsible for developing the local work program and provides staff services for the Rome/Floyd County MPO.

1. An Update to the Transportation Plan will consist of the deletion of a project from the Plan, the addition of a project to the Plan, or major changes in the design or scope of a project.
2. Updates to the adopted Transportation Plan will follow the MPO committee structure for the review of projects. This consists of review of the changes by the following committees: 1) CAC, 2) TCC, and 3) the Policy Committee. The CAC and the TCC will forward any comments or recommendations regarding the change to the Policy Committee.
3. Notice of changes to the Transportation Plan will be given in local newspapers at least 15 days before the proposed amendment is reviewed by the CAC. The public notice will invite public comments at this meeting. The CAC will forward a recommendation to the Transportation Policy Committee regarding the proposed Plan amendments.
4. If an individual or group is concerned about a transportation project or policy, they shall address the CAC regarding the issue. The CAC will forward a recommendation to the Policy Committee regarding the matter. The Chairperson of the CAC, who is a voting member of the Policy Committee, will brief the Policy Committee regarding the CAC's findings. The individual or group may also address the Transportation Policy Committee with their concerns, if necessary.

General Public Outreach Efforts

It should be noted that special participation procedures have been developed regarding the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP) and Public Participation Plan (PPP).

- a) **Regularly Scheduled Rome/Floyd County MPO Meetings:** The time, place, and date of all regularly scheduled meetings will be posted in the Governmental Building and in the office of the Rome/Floyd County Planning Department. The media (the designated local newspaper) will be provided notices of all Policy, TCC, and CAC meetings. Televised meetings/virtual meetings will be held and advertised the same as regularly scheduled meetings, if necessary. In addition to the notices, an agenda of items to be discussed is also provided. Notice will be provided to the local newspaper and placed on the City's website at least five days prior to regularly called Policy Committee meetings. Any changes to those meetings' dates, times, or locations will be provided to the local newspaper and posted on the City's websites at least 48 hours prior to the meeting's start time.
- b) **Special-Called Meetings:** The Chairman of each MPO committee may call a special meeting provided that a notice of the time, place, and date of the meeting is posted 24 hours in advance of said meeting. The media will be notified of these meetings.
- c) **Agendas and Minutes:** Agendas for each regularly-called Policy Committee meetings will be available to committee members and the general public prior to each committee meeting. The minutes of all MPO committees will be available at the next regularly scheduled meeting of the committee. Agendas and minutes will be posted on the MPO website.
- d) **Social Media:** The MPO will utilize appropriate social media avenues to post pertinent information and notices on a frequent basis. This also provides another opportunity for the public to provide public input to the MPO's on-going planning process.
- e) **Virtual Meetings:** The MPO will provide online participation opportunities as appropriate, most likely via Zoom. Virtual public meetings will include the same information provided at in-person public meetings and will be advertised at the same time as in-person opportunities. Zoom

information and how to join the virtual meeting will be outlined via email, along with attached agendas, minutes, and any other necessary documents for the meeting. Virtual meetings will only be held in the case of extenuating circumstances beyond the control of the metropolitan planning organization.

- f) **Rome/Floyd Webpage:** The MPO maintains a webpage. The URL for the webpage is <http://romefloyd.com>. Information related to the MPO's planning activities and meeting times, dates, and locations is posted on a regular basis.
- g) **Open Meetings:** All committee meetings will be open to the public.
- h) **Responses to Public Input:** When significant public input is received on draft plans as a result of the public involvement process, a summary analysis, or report on the content of the comments and the responses shall be prepared and made part of the final document and shall be copied to those commenters.
- i) **ADA Consideration:** As set forth in the Americans with Disabilities Act of 1992, the Rome City Government and the Floyd County Government do not discriminate on the basis of disability, and will assist citizens with special needs given proper notice (seven working days).

Process to Solicit Public and Private Input in the Development and Update of the Metropolitan Transportation Plan (MTP)

INITIAL ADOPTION PROCESS:

1. In an effort to facilitate a proactive citizen participation process in the early development of the Plan, staff will schedule meetings with interested groups and other citizens in the community. These meetings will be scheduled early in the process of the preparation of the plan, and before it is presented to the Rome/Floyd County Citizen's Advisory Committee (CAC), the Technical Coordinating Committee (TCC) and the Policy Committee (TPC).
2. The process of these meetings will be to solicit the participants' opinions regarding transportation goals and priorities for the planning area. Notes will be taken at these meetings and any findings incorporated into the planning process.
3. Staff will schedule a general public hearing regarding the transportation plan early in the planning process. The public hearing will be held by the Citizen's Advisory Committee. The Chairperson of the Citizen's Advisory Committee will act as Chairperson for the meetings. Notice of the public hearing will be published in the local newspapers at least 15 days before the hearing. A notice will also be given on all avenues of Social Media utilized by the MPO. Notice will also be given to the database of interested parties encouraging their participation.
4. The purpose of this meeting will be to solicit public-private participation and assist in establishing goals early in the process of preparing the Transportation Plan.
5. A series of public informational meetings will be held at various locations in the study area to solicit local public and private input to the planning process. Notice of these meetings will be given to a local newspaper, and posted on social media platforms at least 15 days before the meeting. All efforts will be taken to hold meetings in facilities that are ADA compliant and located near transit routes.

6. Copies of the Plan will be available for public review at the offices of the Rome/Floyd County Planning Department.
7. Public comments regarding the Plan will be responded to in the appendix of the final Plan.
8. The Plan will be submitted to the appropriate state and federal agencies for review.

Process to Solicit Public Input in the Development and Update of the Transportation Improvement Program (TIP)

INITIAL ADOPTION PROCESS:

1. In an effort to facilitate a proactive citizen participation process in the early development of the Plan, staff will schedule meetings with interested groups and other citizens in the community. These meetings will be scheduled early in the process of the preparation of the plan, and before it is presented to the Rome/Floyd County Citizen's Advisory Committee (CAC), the Technical Coordinating Committee (TCC) and the Policy Committee (TPC).
2. Before the TIP is initially adopted by the Rome/Floyd Policy Committee, a public informational meeting will be held at least 15 days before the meeting at which the TIP is given approval. Notice of this meeting will be published in a newspaper of general circulation at least 15 days before the meeting. Notice of the meeting will be shared on all platforms of the MPO's social media and website.

Process to Solicit Public Input in the Development and Update of the Unified Planning Work Program (UPWP)

Citizen participation is encouraged in the development of the UPWP through the MPO Planning process which provides opportunities for input into various planning tasks and project review. The MPO Committees consist of a Citizen Advisory Committee, the Technical Committee and the Policy Committee. The implementation of the Unified Planning Work Program is the responsibility of the MPO. The Transportation Policy Committee is responsible for adopting the final Unified Planning Work Program. In addition, any amendments to the UPWP must be approved by the Transportation Policy Committee. The UPWP is readily available to the public in hard copy and on the MPO website.

Process to Solicit Public Input in the Development and Update of the Public Participation Plan (PPP)

A public review period will be required for the adoption or subsequent revision to the Public Participation Process for the Rome/Floyd County MPO. Public notice will be given for this comment period by publishing an advertisement in a newspaper(s) for general circulation at least forty-five (45) days before the final public participation process is adopted or subsequently revised by the Policy Committee. The public notice will be placed on the MPO website as well as other places of general interest. The public review notice will also be made available to other interested parties (i.e. public transit agencies, freight companies, and bike/ped users). In addition, the public review period notice will be made available in minority publications and on public transit buses for minority and low-income

groups. The proposed Public Participation Plan will be made available to the public at the Rome/Floyd County Planning Department Office and on the MPO website located at www.romefloyd.com.

SECTION IV: AMENDMENT PROCESS

In some cases, it may be necessary to amend certain planning documents. The information below summarizes the amendment process under the Rome/Floyd County program in case revisions are needed.

Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP)

If the Policy Committee determines it is necessary to amend the final MTP and/or TIP, the proposed change will be brought before the Citizen's Advisory Committee, Technical Coordinating Committee, and the Transportation Policy Committee. Citizens, stakeholders, federal, state, local partners, and committee members will adequate time for a public comment period. Also, the proposed change will be submitted to GDOT and FHWA for review. It will be classified as an Administrative Modification, an Amendment, or a Special Administrative Modification (SAM), if necessary. Administrative modifications may be deemed time-sensitive or urgent for other reasons and thus would be considered for processing as a SAM. At the request of the project sponsor, MPO staff will review the proposed project change for distribution as a SAM. Once the SAM has been reviewed, it is distributed, by email describing the change, to partner agencies and the project sponsor, including a copy of the updated TIP page. The SAM and updated TIP page will be posted to the MPO website after distribution. FHWA has the final rejection or acceptance for a project to be processed in this manner and should be consulted with before distribution of the SAM.

Administrative Modifications

The following actions are eligible as Administrative Modifications to the MTP/TIP:

- Revise a project description without changing the project scope, conflicting with the environmental document or changing the conformity finding in nonattainment and maintenance areas (less than 10% change in project termini according to GDOT). This change would not alter the original project intent
- Splitting or combining projects
- Federal funding category change
- Minor changes in expenditures for transit projects
- Roadway project phases may have a cost increase less than \$2,000,000 or 20% of the amount to be authorized
- Shifting projects within the TIP as long as the subsequent annual draft was submitted prior to September 30
- Projects may be funded from lump sum banks as long as they are consistent with category definitions

An Administrative Modification can be processed in accordance with these procedures provided:

- It does not impact financial constraint
- It does not require public review and comment
- If applicable, it does not affect the air quality conformity determination

Amendments to the Unified Planning Work Program (UPWP)

For alterations to a specific fiscal year UPWP related to the types of changes described in the TIP and MTP process:

Administrative modifications to the UPWP can be achieved by MPO staff coordinating with GDOT and the relevant Federal partner agency (i.e., FHWA or FTA);

Full amendments to the UPWP must be brought forward by MPO staff and approved by the Rome/Floyd Policy Committee, then submitted to GDOT and the relevant Federal partner agency (i.e., FHWA or FTA) for final approval.

All planning documents are readily available to the public through the use of printed materials, newsletters and the MPO website located at www.romefloyd.com.

SECTION V: GENERAL RESPONSIBILITIES OF THE CITIZEN'S ADVISORY COMMITTEE (CAC) REGARDING THE PUBLIC INVOLVMENT PROCESS

1. The CAC will be a central actor in coordinating public involvement in the MPO planning process.
2. The CAC functions by providing information to the interested public regarding transportation plans and projects.
3. The CAC will participate in the review of social, economic, and environmental considerations that are essential for developing a viable transportation study for the area.
4. The CAC will assess public opinion relative to the transportation study's activities, with recommendations to the Technical Coordinating and Transportation Policy Committee.

SECTION VI: ROME/FLOYD COUNTY MPO TRANSPORTATION COMMITTEE MEMBERS

An up to date committee roster can be found on the MPO's webpage in the current UPWP:
<https://romefloyd.com/departments/Transportation>

Policy Committee Voting Members

Citizen's Advisory Committee Chair
Floyd County Commissioner (2)
Rome City Commissioner (2)
Cave Spring Mayor
Cave Spring Council Member (1)
Floyd County Manager
Rome City Manager
Rome/Floyd Co. Planning Commission Chair
District 6 Engineer, GDOT (or their designee)
GDOT Director of Planning (or GDOT Planning Designee)

Citizen's Transportation Committee Members

Floyd County Appointments (3)
City of Rome Appointments (3)
Director, Rome Transit Department
CAC Chairman

Technical Coordinating Committee Members

Assistant City Manager
City Public Works Director
City Engineer
Director, Rome Transit Department
Transportation Coordinator, Rome Transit Department
Public Works/Council Member, City of Cave Spring
County Public Works Director
Director of Community Development Department
County Engineer, Floyd County Public Works
Planning Director, Rome/Floyd County Planning Department
Transportation Planner, Rome/Floyd County Planning Department
Transportation Planner, Office of Planning, Atlanta
GDOT District 6 Planning and Programming Engineer, White District Office
GDOT Transit Program Manager, Office of Intermodal Programs, Atlanta
GDOT Area Engineer, Rome
Planning Director, NWGRC

Technical Coordinating Committee Non – Voting Members

GDOT Transit Planner, Office of Intermodal Programs

GDOT Branch Chief, Office of Planning (also non-voting member of the Policy Committee)

Vice-Chairman of Citizen’s Advisory Committee

Chairman, Transportation Committee, Rome Chamber of Commerce

Environmental and Urban Planning Engineer, Federal Highway Administration

APPENDIX A: USEFUL ACRONYMS

- 3C: Continuing, Comprehensive, Cooperative
- APA: American Planning Association
- APTA: American Public Transit Association
- CAC: Citizen's Advisory Committee
- CFR: Code of Federal Regulations
- EPA: Environmental Protection Agency
- FAST Act: Fixing America's Surface Transportation Act
- FHWA: Federal Highway Administration
- FRA: Federal Railroad Administration
- FTA: Federal Transit Administration
- GDOT: Georgia Department of Transportation
- GIS: Graphic Information Systems
- HPMS: Highway Performance Monitoring System
- HSIP: Highway Safety Improvement Program
- ITS: Intelligent Transportation Systems
- LEP: Limited English Proficiency
- MPO: Metropolitan Planning Organization
- MTP: Metropolitan Transportation Plan
- NEPA: National Environmental Protection Act
- NWGRC: Northwest Georgia Regional Commission
- PC: Policy Committee
- PEL: Planning and Environmental Linkages
- PL: Planning Funds (Highway) Allocated for the MPO
- RFMPO: Rome/Floyd County Metropolitan Planning Organization
- RTD: Rome Transit Department
- RTP: Regional Transportation Plan
- SRTS: Safe Routes to School
- STIP: State Transportation Improvement Program
- TAZ: Traffic Analysis Zone
- TCC: Technical Coordinating Committee
- TDP: Transit Development Plan
- TE: Transportation Enhancement
- TIP: Transportation Improvement Program
- UPWP: Unified Planning Work Program

RESOLUTION
ADOPTION OF ROME-FLOYD MPO PUBLIC PARTICIPATION PLAN

WHEREAS, the federal regulations promulgated under the Moving Ahead for Progress in the 21st Century Act, P.L. 112-141 (MAP-21) mandate that Metropolitan Planning Organizations have a Public Participation Plan; and

WHEREAS, the Rome-Floyd County Metropolitan Planning Organization has been designated by the Governor of the State of Georgia as the body responsible for the transportation planning process for Floyd County and the municipalities within the County; and

WHEREAS, the Public Participation Plan lays out the methods by which the general public and affected agencies can have input into transportation planning for the community consistent with a comprehensive, continuous, and cooperative transportation planning process;

NOW, THEREFORE, BE IT RESOLVED, that the Rome-Floyd County Metropolitan Planning Organization does hereby adopt this Public Participation Plan.

Certified this 23rd day of September, 2020,

Allison Watters

Allison Watters, Chairman Rome-Floyd County Policy Committee

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Rome Transit Department operates a transit system within the City of Rome. The Language Assistance Plan (LAP) has been prepared to address Rome Transit Department's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Rome Transit Department service area there are 4,253 residents or 4.6% who describe themselves as not able to communicate in English "very well" (Source: US Census Data, 2019 American Community Survey). Rome Transit Department is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Rome Transit Department has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Rome Transit Department be able to communicate effectively with all of its riders. When Rome Transit Department is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Rome Transit Department is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Rome Transit Department undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request

- Translation: Providing timely translation of important documents
- Staffing: Identifying Rome Transit Department staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Rome Transit Department services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Rome Transit Department program, activity or service.
2. The frequency with which LEP persons come in contact with Rome Transit Department programs, activities or services.
3. The nature and importance of programs, activities or services provided by Rome Transit Department to the LEP population.
4. The resources available to Rome Transit Department and overall costs to provide LEP assistance
 - a. **Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 91,501 residents in the Rome Transit Department service area 4,253 residents describe themselves as speaking English less than “very well”. People of Latin origin descent are the primary LEP persons likely to utilize Rome Transit Department services. For the Rome Transit Department service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 95.4% (English speakers and non-English speakers) speak English “very well”. For groups who speak English “less than very well” (4,253 residents and 4.6% of the total population), 8% speak Spanish. And 1% speak other Indo-European languages.

Language Spoken at Home

Language	Number	Percent
Population 5 years and over	91,501	100
Speak only English	82,105	89.7%
Speak a language other than English	9,396	10.3%
Spanish or Spanish Creole	7,317	8%
Other Indo-European languages	945	1%
Asian and Pacific Island languages	17	0%
Other languages	117	0.1%

a. *Source: US Census Data, 2019 American Community Survey*

Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Rome Transit Department has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that after English, Spanish is the most prominent spoken language in Floyd County. Phone inquiries and staff survey feedback indicated that Rome Transit Department dispatchers and drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 10 years, Rome Transit Department has had 0 requests for translated documents.

b. Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s *Policy Guidance Concerning Recipient’s Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person’s inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

c. Factor 4: The Resources Available to the Recipient and Costs

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

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

a. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Rome Transit Department has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 89.7% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (8%). Of those whose primary spoken language is Spanish, approximately 3.5% identify themselves as speaking English less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” (1,046 residents) account for 1.1% of the service area population.

Languages Spoken at Home

Languages Spoken at Home	Number	Percent
Population 5 years and over	91,501	100
Speak only English	82,105	89.7%
Speak a language other than English	9,396	10.3%
Spanish or Spanish Creole	7,317	8%
Other Indo-European languages	945	1%
Asian and Pacific Island languages	17	0%
Other languages	117	.1%

Source: US Census Data, 2019 American Community Survey

Rome Transit Department may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Rome Transit Department Meetings. This will assist Rome Transit Department in identifying language assistance needs for future events and meetings.
3. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Rome Transit Department has undertaken the following actions to improve access to information and services for LEP individuals:

1. If the MPO receives a request for assistance in a language other than English, it is likely that a translator can be found from the ranks of City or Rome or Floyd County staff.

2. Provide bilingual staff at community events, public hearings, and transit committee meetings if needed.
3. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers, if not first available by existing bilingual staff.

Rome Transit Department will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

c. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Rome Transit Department, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and Spanish.

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

The following training will also be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Note to LEP Persons

Rome Transit Department will make Title VI information available in English Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Rome Transit Department office lobby, on buses, and all legal advertisements for public meetings. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- 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 Rome Transit Department's financial resources are sufficient to fund language assistance resources needed

Rome Transit Department understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Rome Transit Department is open to suggestions from all sources, including customers, Rome Transit Department staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Rome Transit Department service area does have LEP populations which qualify for the Safe Harbor Provision. [As shown in Appendix H, Spanish speakers qualify for the Safe Harbor Provision as the number of person which speak Spanish is counted a 8% and 7,317 persons.]

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Rome Transit Department may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H

Operating Area Language Data: Rome Transit Department Service Area

LANGUAGES SPOKEN AT HOME in FLOYD COUNTY, GA

	Number	Percentage
Total:	91,501	100%
Speak only English	82,105	89.7%
Spanish:	7,317	8.0%
Speak English "very well"	4,110	4.5%
Speak English less than "very well"	3,207	3.5%
French, Haitian, or Cajun:	102	0.1%
Speak English "very well"	94	0.1%
Speak English less than "very well"	8	0.0%
German or other West Germanic languages:	161	0.2%
Speak English "very well"	149	0.2%
Speak English less than "very well"	12	0.0%
Russian, Polish, or other Slavic languages:	37	0.0%
Speak English "very well"	19	0.0%
Speak English less than "very well"	18	0.0%
Other Indo-European languages:	945	1.0%
Speak English "very well"	561	0.6%
Speak English less than "very well"	384	0.4%
Korean:	217	0.2%
Speak English "very well"	59	0.1%
Speak English less than "very well"	158	0.2%
Chinese (incl. Mandarin, Cantonese):	145	0.2%
Speak English "very well"	0	0.0%
Speak English less than "very well"	145	0.2%
Vietnamese:	270	0.3%
Speak English "very well"	76	0.1%
Speak English less than "very well"	194	0.2%
Tagalog (incl. Filipino):	22	0.0%
Speak English "very well"	11	0.0%
Speak English less than "very well"	11	0.0%
Other Asian and Pacific Island languages:	17	0.0%
Speak English "very well"	17	0.0%
Speak English less than "very well"	0	0.0%
Arabic:	46	0.1%
Speak English "very well"	8	0.0%
Speak English less than "very well"	38	0.0%
Other and unspecified languages:	117	0.1%
Speak English "very well"	39	0.0%
Speak English less than "very well"	78	0.1%

Source: US Census Data, 2019 American Community Survey

LANGUAGES SPOKEN AT HOME in FLOYD COUNTY, GA	Number	Percentage
Total Population	91,501	100%
Speaks English only	82,105	89.7%
Speaks a Language other than English	9,396	10.3%
Spanish/Spanish Creole	7,317	8.0%
Other Indo-European Languages	945	1.0%
Asian/Pacific Island Language	17	0%
Other languages	117	0.1%
Speak English less than "very well"	4,253	4.6%
Speaks English "very well"	5,143	5.6%
Speaks Only English or Speaks English "very well"	87,248	95.4%
No English or Spanish & speaks English less than "very well"	1,046	1.1%

Source: US Census Data, 2019 American Community Survey

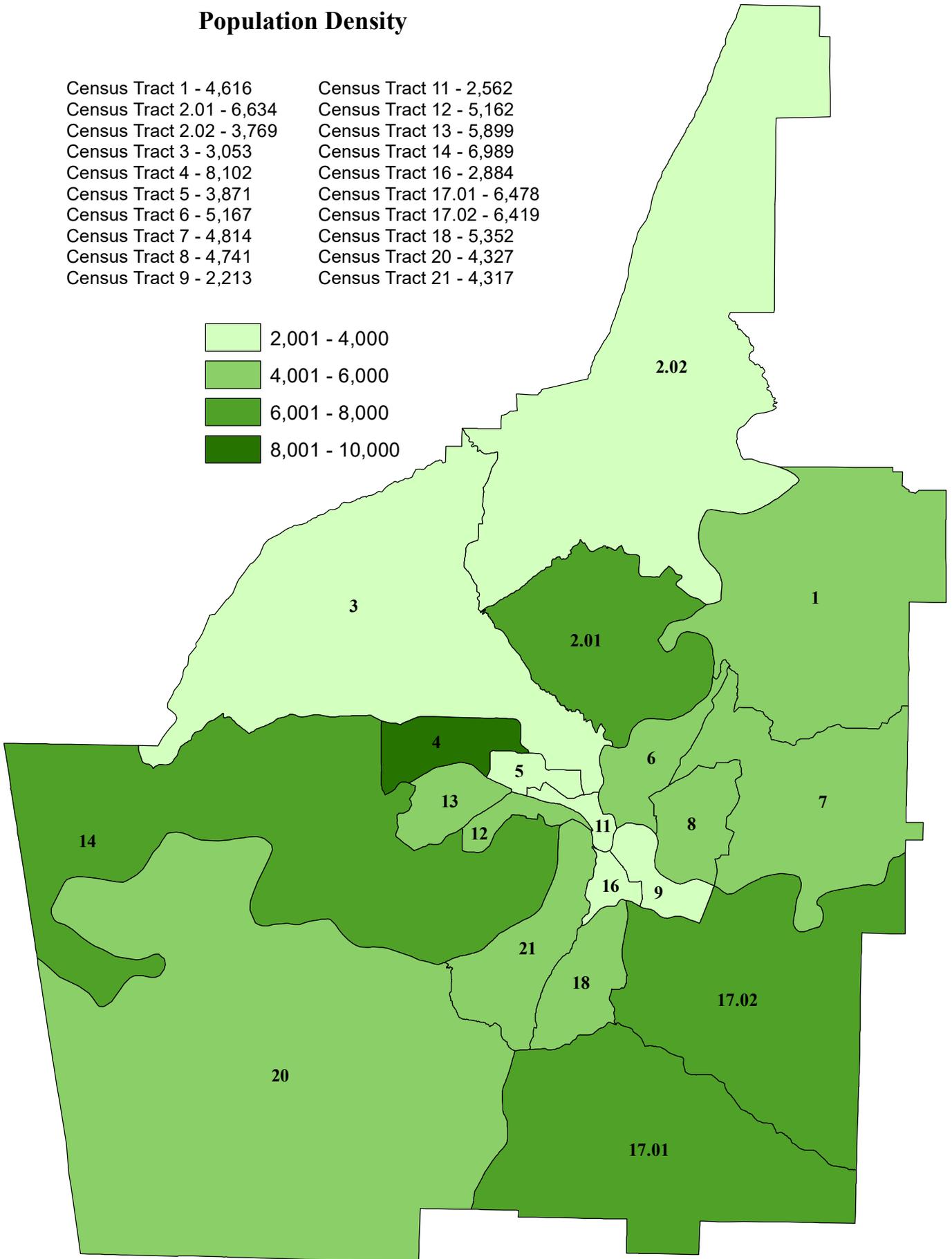
Appendix I

Demographic Maps

Floyd County Georgia

Population Density

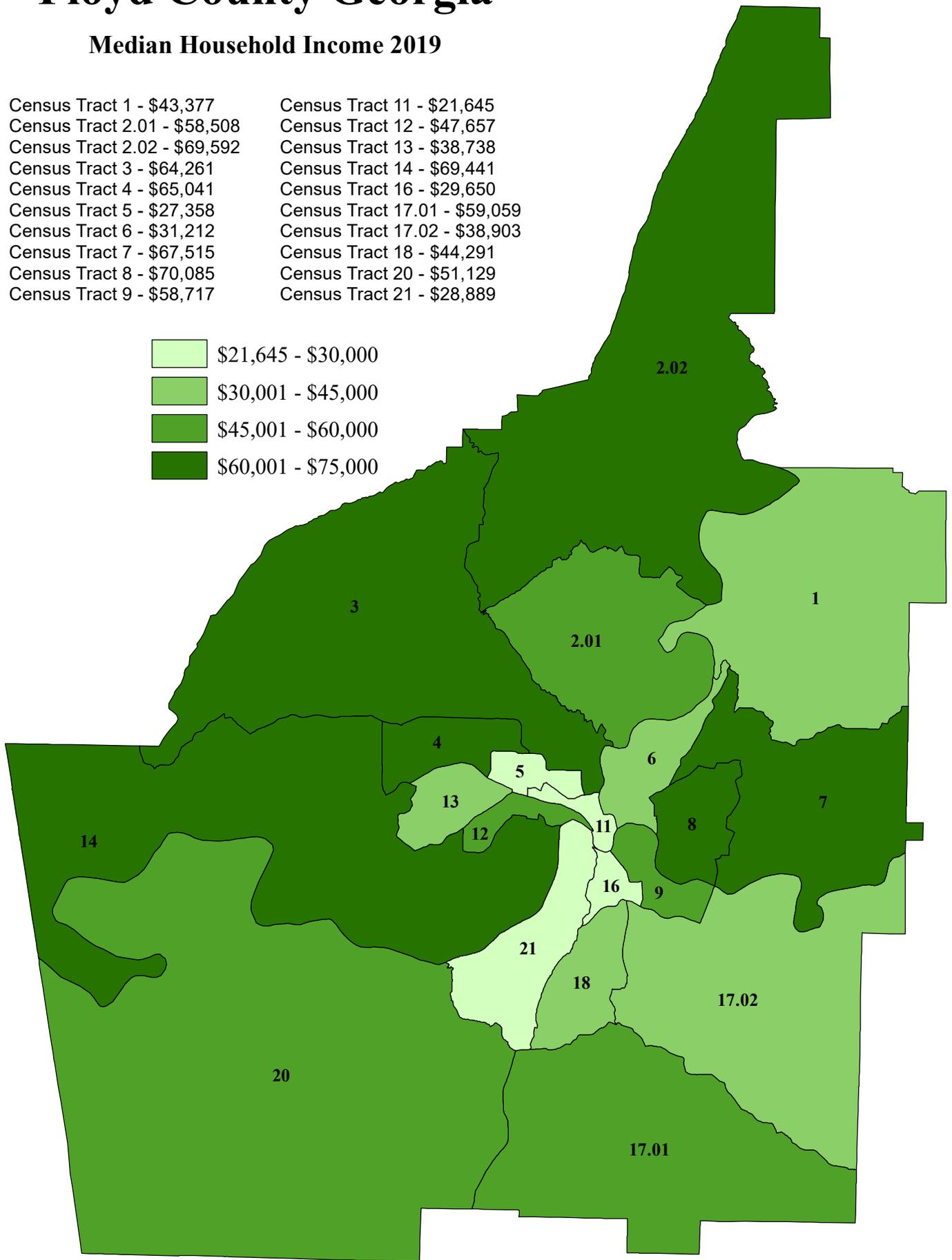
Census Tract 1 - 4,616	Census Tract 11 - 2,562
Census Tract 2.01 - 6,634	Census Tract 12 - 5,162
Census Tract 2.02 - 3,769	Census Tract 13 - 5,899
Census Tract 3 - 3,053	Census Tract 14 - 6,989
Census Tract 4 - 8,102	Census Tract 16 - 2,884
Census Tract 5 - 3,871	Census Tract 17.01 - 6,478
Census Tract 6 - 5,167	Census Tract 17.02 - 6,419
Census Tract 7 - 4,814	Census Tract 18 - 5,352
Census Tract 8 - 4,741	Census Tract 20 - 4,327
Census Tract 9 - 2,213	Census Tract 21 - 4,317



Floyd County Georgia

Median Household Income 2019

Census Tract 1 - \$43,377	Census Tract 11 - \$21,645
Census Tract 2.01 - \$58,508	Census Tract 12 - \$47,657
Census Tract 2.02 - \$69,592	Census Tract 13 - \$38,738
Census Tract 3 - \$64,261	Census Tract 14 - \$69,441
Census Tract 4 - \$65,041	Census Tract 16 - \$29,650
Census Tract 5 - \$27,358	Census Tract 17.01 - \$59,059
Census Tract 6 - \$31,212	Census Tract 17.02 - \$38,903
Census Tract 7 - \$67,515	Census Tract 18 - \$44,291
Census Tract 8 - \$70,085	Census Tract 20 - \$51,129
Census Tract 9 - \$58,717	Census Tract 21 - \$28,889



Floyd County Georgia

Percentage of Population that Speaks Spanish English Not Very Well

Census Tract 1 - 0.8 %	Census Tract 11 - 6.9%
Census Tract 2.01 - 1.9%	Census Tract 12 - 17.9%
Census Tract 2.02 - 0.3%	Census Tract 13 - 9.5%
Census Tract 3 - 3.0%	Census Tract 14 - 3.7%
Census Tract 4 - 8.7%	Census Tract 16 - 4.8%
Census Tract 5 - 14.9%	Census Tract 17.01 - 0.1%
Census Tract 6 - 2.2%	Census Tract 17.02 - 2.9%
Census Tract 7 - 0.6%	Census Tract 18 - 0.4%
Census Tract 8 - 0.4%	Census Tract 20 - 0.0%
Census Tract 9 - 0.0%	Census Tract 21 - 8.2%

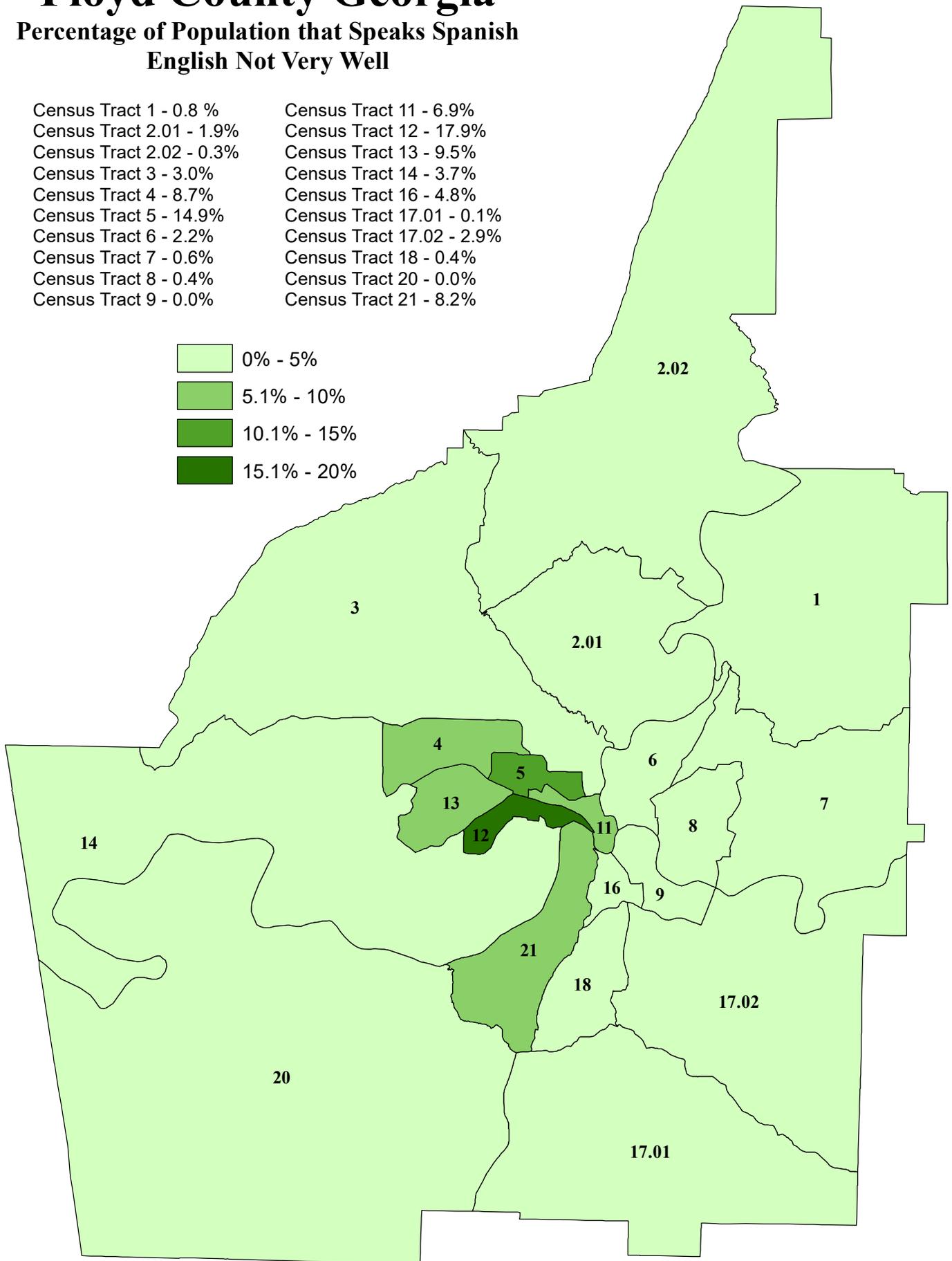
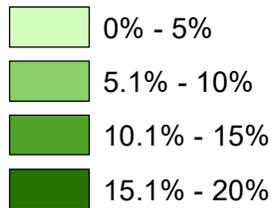
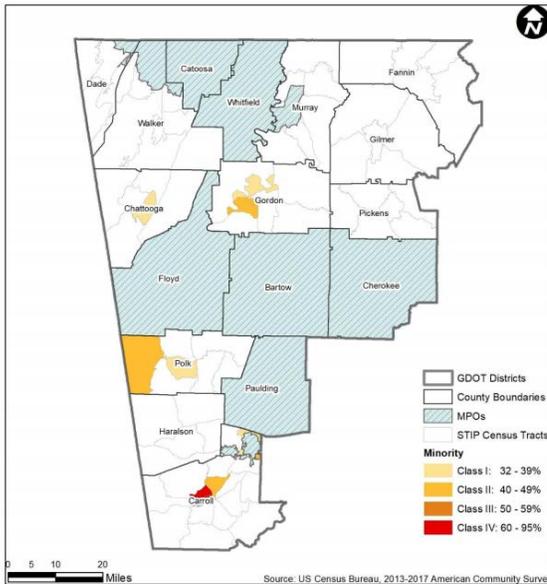
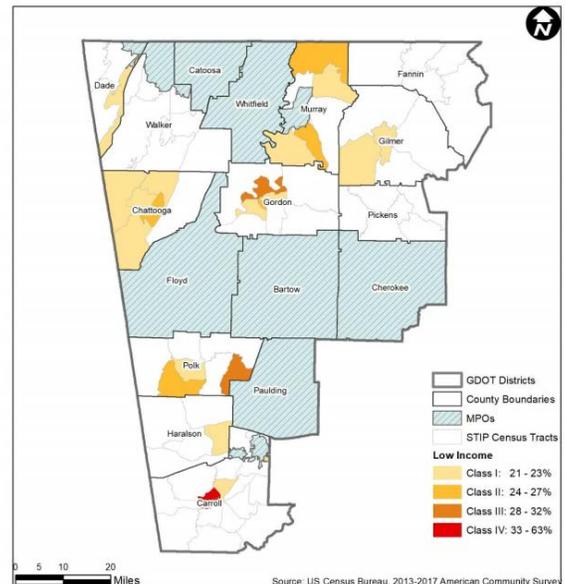


Figure 39: District 6 Minority EJ Population



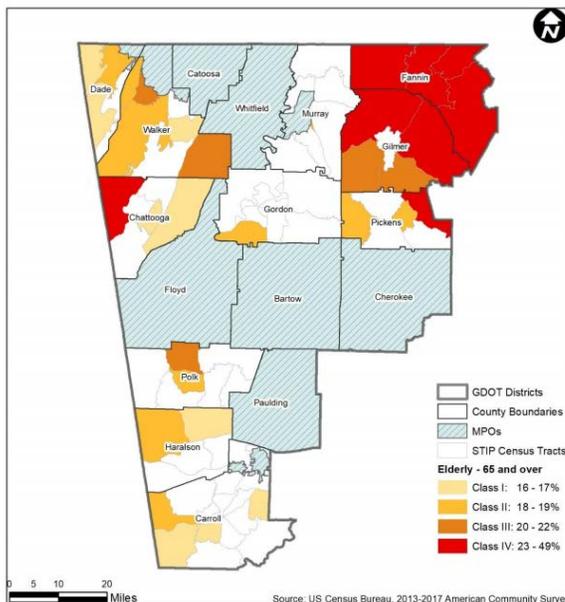
(Source: GDOT STIP, Environmental Justice Identification and Proposed Outreach Report 2021)

Figure 40: District 6 Low-income EJ Population



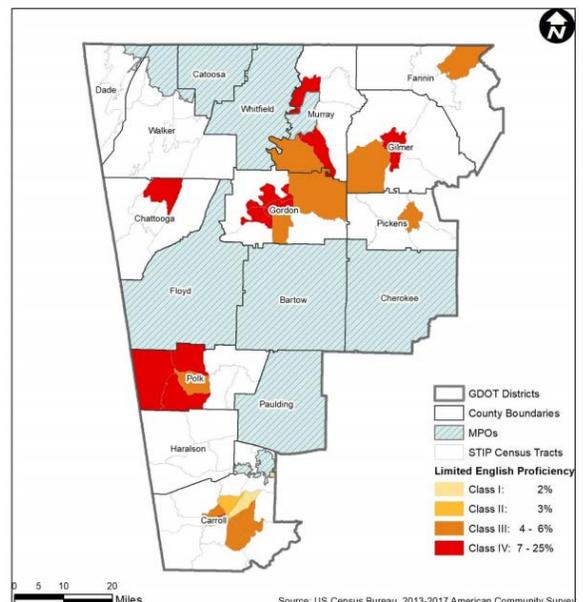
(Source: GDOT STIP, Environmental Justice Identification and Proposed Outreach Report 2021)

Figure 41: District 6 Elderly EJ Population



(Source: GDOT STIP, Environmental Justice Identification and Proposed Outreach Report 2021)

Figure 42: District 6 LEP EJ Population



(Source: GDOT STIP, Environmental Justice Identification and Proposed Outreach Report 2021)

Appendix J

Title VI Equity Analysis

Rome Transit Department has not performed Title VI Equity Analysis.