



# TITLE VI Program

April 1, 2021

Pee Dee Regional Transportation Authority

Title VI Program

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## **PDRTA Title VI Program Policy**

**Effective April 1, 2021**

### **Pee Dee Regional Transportation Authority**

Pee Dee Regional Transportation Authority (PDRTA) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

It is the objective of PDRTA to:

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

The Executive Director, senior management and all supervisors and employees share the responsibility for carrying out PDRTA's commitment to Title VI. The Human Resources Manager (Title VI Coordinator) is responsible for the daily operation of the program and receives as well as investigates Title VI complaints that come through the Title VI complaint tracking process. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with PDRTA.

For more information on PDRTA's civil rights program, and the procedures to file a complaint, contact:

Anja Giannace Dixon, TITLE VI Coordinator

313 S. Stadium Rd.,

Florence, SC 29506

Phone 843-665-2227

Email [adixon@pdrta.org](mailto:adixon@pdrta.org);

or visit [www.pdrta.org](http://www.pdrta.org)

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, the complainant may contact 843-665-2227.

### **General Requirements**

#### **Title VI Notice to the Public**

The Pee Dee Regional Transportation Authority has posted their Title VI Notification to the public in the following locations:

- PDRTA's website [www.pdrta.org](http://www.pdrta.org)
- Agency's office including Operations (Hallway), Drivers' Lounge, Maintenance Shop
- Front Office/Lobby/Reception
- Florence Transit Center
- Transit Vehicles
- Human Resources Office

**Notifying the Public of Rights Under Title VI  
PEE DEE REGIONAL TRANSPORTATION AUTHORITY**

- The Pee Dee Regional Transportation Authority (PDRTA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with PDRTA.
- For more information on PDRTA's civil rights program, and the procedures to file a complaint, contact 843-665-2227; email [adixon@pdrt.org](mailto:adixon@pdrt.org); or visit our administrative office at 313 S. Stadium Rd, Florence, SC 29506. For more information, visit [www.pdrt.org](http://www.pdrt.org).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 843-665-2227.



*This notification is posted in the above-mentioned locations and accessible to the public.*

**Title VI Complaint Procedures**

Any person who believes she or he has been excluded from participation in, been denied the benefits of, or subjected to unlawful discrimination under any Pee Dee Regional Transportation Authority (hereinafter referred to as "PDRTA") service, program or activity, and believes she or he has been discriminated against on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the PDRTA's Title VI Complaint Form.

The Title VI Coordinator will be notified of all Title VI complaints, reviews the complaints and informs the Executive Director and appropriate Department Director. PDRTA investigates complete complaints received no more than 180 days after the alleged incident. Once a complaint is received, the Title VI Coordinator will initially contact the complainant within 72 hours to confirm the receipt of the complaint and request more information if needed to resolve the case.

If PDRTA requires more information to investigate the case, the complainant has 10 business days from the date of the request to send information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information requested within 10 business days, PDRTA can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After 14 business days from the date of the initial contact, the investigator reviews the complaint, and 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. An 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 60 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. If information is needed in another language or if you have additional questions, then contact 843-665-2227.

### **Title VI Complaint Tracking**

The Executive Director, senior management and all supervisors and employees share the responsibility for carrying out PDRTA's commitment to Title VI. The Human Resources Manager (Title VI Coordinator) is responsible for the daily operation of the program and receives as well as investigates Title VI complaints that come through the Title VI complaint tracking process.

Once a complaint comes into Dispatch or administrative office at 843-665-2227, through email, letter, social media or any other means of communication it is logged into PDRTA's Title VI Complaint Tracking Log to include the following:

- Date that the transit-related Title VI complaint was filed
- Complainant's name, mailing address, and contact information (i.e., telephone number, email address, etc.)
- Summary of the allegations: how, when, where and why the complainant believes he or she was discriminated against. Including the location, names and contact information of any witnesses.
- Status of the complaint
- Actions taken by PDRTA in response
- Other information that he/she deems significant

Dispatch or the recipient immediately forwards the complaint to the Human Resources Manager for investigation. The Human Resources Manager ensures the information is complete and follows Title VI complaint procedures. The Operations department is responsible for securing any and all video evidence in a prompt manner that may be retrieved in regard to the complaint. The Human Resources Manager reviews the report monthly identifying outstanding complaints.

PDRTA shall also provide appropriate assistance to complainants who are limited in their ability to communicate in English.

#### **List of Transit-Related Title VI Investigations, Complaints, and Lawsuits**

PDRTA shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits
- Complaints

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

The list of transit-related Title VI investigation, lawsuit, or complaints will be stored in Operations. It will

be reviewed monthly in conjunction with the complaint tracking log.

Currently, there have been no transit-related Title VI investigations, complaints, or lawsuits.

### **Public Participation Plan**

PDRTA conducts public participation /outreach efforts to identify, provide information to, and receive information from minority and low-income persons in the service area. Below is a summary of these activities:

One of PDRTA's priorities is to reach out to local businesses and educational facilities that may regularly interact with LEP persons to promote and inform them of PDRTA services available to the community. For instance, PDRTA partners with Poynor Adult Education in Florence who offers ESL (English as a Second Language) classes to LEP (Limited English Proficiency) adult students in the area. The ESL classes at Poynor are free and ESL students who are provided with PDRTA bus passes may ride our buses at no charge. Our agency ensures that ESL students have Spanish PDRTA brochures and bus maps to help them navigate through town. In addition, PDRTA's Title VI Coordinator visits the school and meets the ESL class to talk about our transportation services available in the area. We also make ESL students aware that our bus drivers are equipped with tools and resources to overcome any language barriers.

Poynor Adult Education and the PDRTA Title VI Coordinator will hosts ESL/Adult Ed field trips to use and promote PDRTA bus services. The PDRTA Title VI Coordinator attends these events to answer any questions ESL students may have. PDRTA also participates in Poynor's community outreach meetings. The school currently holds weekly zoom meetings with GED and high school diploma students and ESL students from various counties in the Pee Dee area. The Title VI Coordinator has attended these meetings to talk about our community services and share about CDL training/bus driver recruitment.

In addition to Poynor Adult Education, PDRTA also reaches out to Ruiz Food, one of the leading distributors of frozen Mexican food, that employs a large number of Spanish speaking employees. PDRTA has provided bus maps and brochures in Spanish to the company as well.



PDRTA has plans to offer vanpool options to allow Ruiz Food employees to share the commuter ride from and to work on a PDRTA bus.

Our transit agency also offers free bus passes to the Housing Authority of Florence. The Housing Authority of Florence manages Affordable Housing for Cheraw, Marlboro County & McColl Housing Authorities in Florence, Chesterfield, Dillon & Marlboro Counties, South Carolina. All four housing authorities offer low-income families, seniors & veterans the opportunity to rent an affordable residence. Free bus ride passes are distributed to the Housing authority and given to their residents every month.

Periodically, PDRTA participates in regularly scheduled monthly community meetings that serve as coordinating councils for social service and human service agencies. These councils are comprised of various agencies who serve a variety of underserved populations throughout our service area. These populations include minorities, low-income persons, individuals with cognitive disabilities, individuals with physical disabilities, single parents, and many more. Long standing councils have continued to meet and discuss issues impacting the above listed groups in Darlington, Chesterfield and Marion Counties.

PDRTA conducts public hearings to engage public comment on proposed service changes in the county areas. Locations are selected to allow for people to use public transportation if needed. All meetings are advertised in local newspapers and advance notices were placed on our buses and on our Facebook page.

During the process of route development, PDRTA completes studies and works with local officials (Planning Department) to make certain that minorities and low-income individuals will have access to the fixed route public bus system. One area that is included are the low-income housing such as the housing authorities within our counties.

PDRTA Board meetings are open to the public and held on the third Thursday of each month at 6:00pm at our main facility at 313 S. Stadium Road in Florence, SC.

PDRTA conducts "Ridership Surveys" to assess the needs of our riders. Members of the PDRTA staff ride the routes to help distribute, collect, and answer any questions regarding the

survey and the services that PDRTA provides. Due to the COVID-19 pandemic, PDRTA has not conducted a survey in 2020 and 2021.

PDRTA participates in Job Fairs and Career Days in the counties throughout our service area. These Job Fairs and Career Days are conducted by the SC Department of Employment and Workforce (SCDEW), local schools, local technical colleges, and other governmental entities and agencies.

PDRTA participates in many local festivals in the counties throughout our service area. This gives us an opportunity to distribute materials about PDRTA, our schedules, our routes, and other important PDRTA information. These festivals usually involve staffing a booth and meeting and greeting persons who come by for information or materials related to our services. Some of the festivals that PDRTA participates in include (before COVID 19 pandemic):

Pecan Festival Florence, S.C.

Sweet Potato Festival Darlington, S.C.

PDRTA has distributed schedules to many businesses throughout the service area including door to door distribution and mail. PDRTA has been utilizing social media as a form of communication with the public. Pee Dee area residents also have the option to communicate with PDRTA through Facebook and Public Comment email address at [comments@pdrt.org](mailto:comments@pdrt.org). In addition, the PDRTA website ([www.PDRTA.org](http://www.PDRTA.org)) is maintained to provide the public with general information about our operations, schedules, and important PDRTA related information.

### **PDRTA Service Standards**

PDRTA is a direct recipient of federal transit grants from the Federal Transit Administration (FTA); therefore, we are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. FTA requires that all fixed route providers of public transportation adopt the following system-wide service standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. The adoption of this policy statement by PDRTA ensures compliance with these requirements.

## **Coverage**

This policy shall be applicable to all activities, services, and operations of PDRTA's public transit system.

## **Background**

### **Service Availability and Operating Environment**

PDRTA routes are operated primarily along major arterials but may run in other locations that are suitable for operation of PDRTA buses if needed, particularly low-income residential areas where public transportation is at a greater demand. PDRTA buses may have stops located within shopping centers for passenger convenience and utilize areas where shelters already exist, minimizing the number of freestanding bus shelters provided for passengers. For stops on private property, PDRTA will ensure that location has been approved by private property owners. PDRTA also provides Demand Response in many of the service areas including Chesterfield, Darlington, Dillon, Florence, Marion and Marlboro Counties.

### **Service Area**

Service coverage is defined as the area within a 3/4-mile walking distance for the nearest bus route corridor. To the extent feasible, PDRTA will serve as many major employers, medical offices, densely populated housing areas, and public housing as deemed feasible within the service area. PDRTA fixed routes may operate outside the service area for purposes of transporting passengers from within the service area to other locations.

### **Service Standards**

#### **Hours of Operation and Vehicle Headways**

Current hours of operation and service levels can be found by referencing PDRTA's website at [www.pdrta.org](http://www.pdrta.org). The hours of operation of ADA Complementary Paratransit services will be the same days and hours as the fixed route service. PDRTA office hours are Monday-Friday 8:00am-5:00pm. The operations department has staff (Dispatchers and Maintenance) at the office from 5am-7pm Monday-Friday with maintenance on call during other operational hours.

PDRTA currently operates and will strive to maintain 60-minute frequency, or “headway”, on all fixed routes during peak and off-peak hours on Monday-Friday. Saturday service in Florence operates from 8 a.m. to 11 a.m. and 1 p.m. to 4 p.m.

Darlington Transit in Darlington SC operates from 7am - 4pm Mon-Fri and 8 a.m. -12 p.m. on Saturdays.

The Hartsville Free Transit operates from 8 a.m. to 1 p.m. and 2 p.m. to 7 p.m. on Mondays-Fridays and 10 a.m. to 2 p.m. on Saturdays.

LakeTran in Lake City SC operates from 7am-5pm Mon-Fri with a break from 1 p.m. to 2 p.m.

PDRTA also connects passengers from Darlington to Florence SC via the Darlington-Florence Commuter that operates 3 roundtrips during the day at 7am, 12pm and 5pm.

Commuter service to Myrtle Beach SC from Lake City and Marion operates the same schedule 364 days a year departing from their respective cities arriving at the Grand Strand and then boarding again in the afternoon to travel back to Marion County and Lake City SC.

In 2019, PDRTA began the Marlboro Area Regional Transit Initiative (MARTi). This service consists of a fixed route that operates in Bennettsville from 9am-5pm Monday-Friday. We operate a Connector that connects Bennettsville, McColl and Clio Monday-Friday from 9am-4pm. We provide Demand Response service in Marlboro County for seniors and those that can not access the fixed routes. Along with those described above PDRTA also provides commuter routes that operate from 6am-8:30am and 6:30pm-9:00pm seven days a week where we take many employees to and from work.

In 2020, PDRTA began the Dillon County Area Transportation (DCAT) service. The DCAT consists of a fixed route that operates hourly service in the City of Dillon from 8am-5pm Monday-Friday. We also provide a Connect service that connects Latta, Little Rock and Hamer to the City of Dillon on Monday, Wednesday and Fridays. We provide Demand Response service for those that can not access the fixed routes. Along with the services described above we now provide commuter services for Harbor Freight Tools and will soon expand to other industries.

In 2021, PDRTA began the Chesterfield County Area Transportation (CCAT). The CCAT provides fixed route service in the Town of Cheraw Monday-Friday from 8am -5pm. We also provide connecting service from Marlboro County to Chesterfield County Monday-Friday during the same hours. PDRTA plans to add additional commuter services on Chesterfield County as well as beginning service to Chesterfield and Pageland.

Any future service hours expansion will operate on a minimum of hourly headways. The goal for PDRTA in the future will be to add additional service to decrease the headway on all fixed routes to make services more accessible and user friendly.

### **Proximity Standard**

PDRTA's fixed routes are designed so that 75-85% of residents/employees in the transit serviceable area are within a ½ mile walking distance from a PDRTA bus stop. The urbanized area will have a higher percentage due to more service being provided than in the rural areas. The proximity standard does not relate to the commuter services that are the longer routes.

### **Service Availability During Inclement Weather**

PDRTA transit staff will assess all instances of inclement weather and make adjustments to service hours and frequency as needed with priority placed on passenger and driver safety. All changes in service during these times will be communicated with the Public Information Offices and included on all passenger alert technologies (facebook) and web sites. Staff may determine that service needs to be delayed, suspended, or frequency of service adjusted during inclement weather. Every effort will be made by PDRTA to provide FTA required paratransit service when determined safe to operate.

### **Passenger Amenities Criteria**

#### **Bus Stop Placement**

In order to provide a safe environment for passenger boarding and alighting, PDRTA will have formally designated bus stop locations. Bus stop signs, consistent with the regionally approved standard, will be used at these established locations. The spacing of the stops will vary by

location, but as a general rule of thumb, will be spaced at least 900 feet apart. There may be some instances where additional stops are needed for transfer purposes. Prior to the placement of any bus stops, transit staff in consultation with the SCDOT, will assess and reach consensus on all locations to ensure the safety of drivers, passengers, and the general public. PDRTA will ensure that all stops and passenger facilities meet Americans with Disabilities Act (ADA) requirements including accessibility at and near bus stop locations.

### **Shelter Placement**

PDRTA will utilize On-Off surveys, video with GPS data, passenger counts, driver input and local planning departments to determine those bus stops that meet the minimum threshold of 20 passengers boarding a day for requiring a passenger shelter. PDRTA will analyze this data on a quarterly basis and update our priority list. PDRTA will plan for the procurement and installation of passenger shelters and amenities for stops meeting this threshold. PDRTA will maximize the use of federal and state funding when possible to offset the cost of procurement and installation. There may be circumstances that restrict the installation of bus shelters in areas that meet our minimum threshold such as right-of-way issues or private property. PDRTA will exercise due-diligence in cases like these.

### **Bench Placement**

There may be some instances where bus stops do not require a passenger shelter, but necessitate the consideration of a bench-only. In these instances where bus stop usage is between 10-20 passengers boarding, but there is great potential for increased ridership, transit staff may opt to use a bench in lieu of a shelter for passenger comfort and to attract new riders. PDRTA currently has more benches than shelters installed throughout the service area.

### **Provision of Information**

PDRTA has designed and is currently installing route schedule maps that will be posted in a schedule box at each bus stop throughout the system. These schedules contain all information required by FTA including fare structure, ADA Complementary Paratransit details, contact information and timetables for the routes.

PDRTA prints route schedules and provides these on board our buses, on our website and at area businesses. We also mail these to individuals when they are requested.

PDRTA has electronic signs on board the transit buses to help passengers identify which route is approaching. This is significant on stops that are served by more than one route.

### **PDRTA Vehicle Loads and Assignment Standards**

PDRTA will strive to have vehicle loads not exceed vehicles' achievable capacities, which are identified below in the chart. Standing passenger capacity can differ for each type of vehicle. During peak times, Commuter Routes may require a high number of standees due to higher ridership numbers.

Vehicle Type	Seated	Standing	Total	Maximum Load Factor
Cut-A-Way 24 ft	14	2	16	1.1
Cut-A-Way 26 ft	18	2	20	1.1
Trolley Bus	26	8	34	1.3
32' Standard Bus	28	11	39	1.39
32' Standard Bus	31	12	43	1.39
37' Standard Bus	37	15	52	1.4
37' Standard Bus	40	16	56	1.4
40' Standard Bus	44	16	60	1.4

## **Vehicle Loads**

Maximum loading standards will establish a goal that all passengers will have a seat for their trip. If PDRTA experiences routes whereby passengers exceed the number of seats available, then an additional transit vehicle, known as a “tripper”, may be dispatched to meet their trip need.

When staff determines that one or more routes are beginning to exceed the seating capacity on 25% or more of the trips provided on a given route or a load factor of 1.4 or greater, then staff will develop budget recommendations for additional service or a larger vehicle type when possible with additional seating capacity to meet this demand. Passengers, who are physically able, always have the option of using grab bars/straps and standing when seats are not available.

## **Vehicle Assignments**

PDRTA will assign vehicles to routes based on the ridership demands, type of route and operating characteristics of buses, including length and turning radius.

Larger vehicles will be assigned to those routes with the highest demand. Routes with lower ridership or that require tight turns on narrow streets may be assigned a cutaway (24-26') bus rather than the larger buses. We will be consistent in ensuring that all vehicles assigned will be in excellent working order and condition regardless of the route it serves. Distribution of vehicles throughout the fixed route system will not be based on age/condition but rather the needs for that route.

PDRTA will maintain its fleet and replace vehicles as required by FTA's minimum service life policy of (12 years or 500,000 miles, 10 years or 350,000 miles for our medium-duty buses and 5 years or 150,000 for light-duty buses.)

## **Fixed Route On-Time Performance Standard**

PDRTA's goal is to provide an average system-wide on-time performance of 95% for fixed route service. PDRTA defines on-time performance as arriving and departing stops within five



minutes of the route timetables. If route(s) are not meeting the on-time performance goal, then staff will analyze the route(s) to develop strategies to improve it. Staff will provide recommendations for approval as needed. PDRTA has partnered with Syncromatics which is a software that helps operators improve their on-time performance.

### **Demographic Table**

PDRTA does not select committees and councils. Board members are elected by the municipalities.

### **Sub-Recipients**

PDRTA does not have any Sub-Recipients.

### **Title VI Equity Analysis**

PDRTA has not constructed a facility

### **Board Meeting Minutes**

PDRTA held a board meeting on March 18, 2021. The minutes are attached showing the board approved the Title VI Program effective April 1, 2021.

## **TITLE VI and LEP Program - Staff Training**

The PDRTA Title VI policy statement along with the LEP Program are reviewed with all new hires during the New Hire Orientation Program. This orientation is conducted with new employees on their first day at work. A copy of the PDRTA TITLE VI policy statement along with a copy of the LEP Program is distributed to all new employees by the Title VI Coordinator. All employees must sign a form acknowledging the receipt of the Title VI and LEP Program.

The programs are also reviewed during 'refresher' training sessions with all front-line employees, such as Drivers and Dispatchers. The Safety & Training Manager provides employees with instructions on how to request translation services when transporting LEP persons and educates them on the importance of staying in compliance with PDRTA's Title VI Program. This information is also included in the Driver's Handbook which is provided to all new hires on their first day of work.

On an annual basis, PDRTA holds a TITLE VI staff meeting and distributes to all employees a copy of the PDRTA Title VI Policy Statement and LEP Plan to remind employees of their Title VI obligations and responsibilities. In addition, the Title VI Coordinator/HR Manager sends out reminder emails and notifications on HR Newsletters throughout the year to administrative and operative staff with important information regarding the Title VI program.



# Pee Dee Regional Transportation Authority

## **LIMITED ENGLISH PROFICIENCY PLAN**

March 2021 Revision

## **Table of Contents**

1. Introduction
2. Executive Order 13166
3. Plan Summary
4. Four Factor Analysis
5. Limited English Proficiency Plan
6. LEP Staff Training
7. Outreach Techniques

## **1. Introduction**

The purpose of the Limited English Proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

## **2. Executive Order 13166**

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 11, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-- National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the Pee Dee Regional Transportation Authority (PDRTA) and governments, private and non-profit entities, and sub recipients.

### **3. Plan Summary**

PDRTA's Limited English Proficiency Plan (LEP) identifies reasonable steps to provide language assistance for LEP persons seeking meaningful access to PDRTA services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the PDRTA's extent of obligation to provide LEP services, the PDRTA undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

1. The number or proportion of LEP persons eligible in the PDRTA service area who may be served or likely to encounter a PDRTA program, activity, or service.
2. The frequency with which LEP individuals encounter PDRTA service employees.
3. The nature and importance of the program, activity or service provided by the PDRTA to the LEP population.
4. The resources available to the PDRTA and overall costs to provide LEP assistance.

A brief description of these considerations is provided in the following section.

### **4. Four Factor Analysis**

1. **The number or proportion of LEP persons eligible in the PDRTA service area who may be served or likely to encounter a PDRTA program, activity, or service.**  
PDRTA's service areas include Darlington County, Florence County, Dillon County, Chesterfield County, Marion County and Marlboro County. Our agency used the most

recent US Census report from 2018 to determine that from a total of 128,710 households, there are 4,957 or 3.85% of LEP households in the PDRTA Service area who are limited in the proficient use of the English language. Spanish speaking households comprise 2.89%, Other Indo-European languages 0.40%, Asian/Pacific Islands 0.34%, and the 'All other category' made up the remaining 0.22%. A copy of the LEP households by County in our service area is attached.

2. **The frequency with which LEP individuals come in contact with a PDRTA program, activity, or service.**

PDRTA monitors how often employees encounter LEP persons by conducting an annual survey with all bus operators providing transportation services to passengers in all PDRTA service areas. PDRTA includes discussions with our transportation management, drivers, and dispatch personnel regarding the importance of tracking encounters in refresher training sessions. Our most recent survey results and conversations revealed that during the reporting period, we have had little or no contact with LEP persons.

3. **The nature and importance of the program, activity, or service provided by the PDRTA to the LEP community.**

The most important issues LEP persons may face in our area are access to health care and employment. The PDRTA currently provides transportation on our ADA Complementary Paratransit and fixed routes for LEP persons. So far, LEP persons have been able to effectively communicate with our drivers and dispatch personnel and reach their destination.

4. **The resources available to PDRTA and overall costs.**

The PDRTA website has been redesigned and is available in different languages, including Spanish. We have also placed directive signs in Spanish on our bus vehicles. Recently, all PDRTA bus maps have been translated into Spanish. These maps will be distributed to local businesses that PDRTA partners with, such as Poynor Adult Education who offers English as a Second Language classes to Spanish-speaking adult students in the area and Ruiz Food who employs a large number of Spanish speaking

individuals. However, as most of the population in our service area speaks English, the PDRTA will continue to evaluate the costs associated with a translation service, updating written materials, and other means of serving the LEP population.

## **5. Limited English Proficiency Plan Outline**

### **How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

1. Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
2. Survey Bus Drivers and other front-line staff on an annual basis regarding their experience on having any direct or indirect contact with LEP individuals.

### **Language Assistance Measures**

The PDRTA implements the following LEP procedures based on the very low percentage of persons speaking other languages or not speaking English at least “well,” and the lack of resources available in the PDRTA service area:

1. The PDRTA website has been redesigned to include translation into Spanish.
2. When an interpreter is needed, in person or on the telephone, PDRTA employees will first attempt to determine what language is required (ISpeakCards are available to passengers on PDRTA buses).
3. PDRTA staff shall use the telephone interpreter service – Language Line Services at 1-866-874-3972, provide our client ID# 516081 and select the language needed or employees may go online at <http://www.language.com>. On the Language Line home page, employees will select the “Need an Interpreter Now link” and follow the directions to receive an access code.



4. All PDRTA buses are equipped with instructions to contact Language Line Services along with ISpeakCards, if needed. Bus Drivers are provided with wallet cards that include instructions on how to utilize Language Line Services.:



## **6. LEP Plan Staff Training**

All PDRTA staff are provided with the LEP Plan on an annual basis. Additionally, the PDRTA Operations staff is educated on procedures to follow in training sessions held by the Safety and Training Manager. The material and educational process will also be covered during the PDRTA staff orientation process for new hires. Training topics are listed below:

1. Understanding the Title VI policy and LEP responsibilities;
2. What language assistance services the PDRTA offers;
3. How to use the Language Line interpretation and translation services;
4. Documentation of language assistance requests;
5. How to handle a Title VI and/or LEP complaint (See Appendix B)

## **7. Outreach Techniques**

Despite the low percentage of LEP persons in the PDRTA service area, our agency makes it a priority to reach out to local businesses and educational facilities that may interact with LEP persons regularly. Consistent communication and involvement in the community allows us to promote PDRTA transportation and reach a larger interest group.

For instance, PDRTA partners with Poynor Adult Education in Florence who offers English as a Second Language classes to adult students in the area. ESL classes at Poynor are free and all ESL students may ride PDRTA buses for free as well. According to the School Director, in 2020, Poynor accommodated about 70 ESL students. All students were provided with PDRTA bus passes. Yet, the number of ESL students using public transportation remained low. According to an ESL teacher, most ESL students speak Spanish and do not feel comfortable boarding the bus due to the existing language barrier. As a result, ESL students at Poynor are now provided with PDRTA bus maps in Spanish by our agency.

Furthermore, the Title VI Coordinator schedules meetings with ESL classes to talk about PDRTA services. Students are provided not only with Spanish bus maps, but they are also informed of how our bus drivers communicate and help our LEP passengers. In addition to quarterly meetings with ESL classes, the Title VI Coordinator and Poynor ESL teachers are host ESL/Adult Education field trips with the students where they ride PDRTA buses around the Florence area.

Besides Poynor Adult Education, PDRTA partners with Ruiz Food, one of the leading distributors of frozen Mexican food. The company has a large number of Spanish-speaking employees and the bus maps in Spanish have been made available to employees of Ruiz Food as well.

Finally, the following are a few options that the PDRTA will incorporate when and/or if the need arises for LEP outreach:

1. If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a public hearing in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known

LEP population in the area (ISpeakCards are available to the LEP persons at such meetings.)

2. When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible.” This means “A Spanish translator will be available”.
3. Key print materials, including but limited to schedules and maps, will be translated and made available at the PDRTA Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

This LEP plan is designed to be flexible and can be easily updated. At a minimum, the PDRTA will follow the Title VI Program update schedule for the LEP Plan. However, major updates most likely will not occur unless the PDRTA finds it necessary and crucial for an update before such time.

Each update should examine all plan components such as:

- I. How many LEP persons were encountered?
- II. Were their needs met?
- III. What is the current LEP population in the PDRTA service area?
- IV. Has there been a change in the types of languages where translation services are needed?
- V. Is there still a need for continued language assistance for previously identified PDRTA programs? Are there other programs that should be included?
- VI. Have the PDRTA’s available resources, such as technology, staff, and financial costs changed?
- VII. Has the PDRTA fulfilled the goals of the LEP Plan?
- VIII. Were any complaints received?

## **Dissemination of the PDRTA Limited English Proficiency Plan**

The PDRTA includes the LEP plan on the PDRTA website ([www.pdrta.org](http://www.pdrta.org)) along with the Title VI Policy and Complaint Procedures. Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the PDRTA Title VI Coordinator.

PDRTA Title VI Coordinator

PDRTA

313 S. Stadium Rd.

Florence, South Carolina 29506

Phone: 843 519-0884

Fax: 843 665 7552

Email: [adixon@pdrta.org](mailto:adixon@pdrta.org)

## Notifying the Public of Rights Under Title VI

### PEE DEE REGIONAL TRANSPORTATION AUTHORITY

- The Pee Dee Regional Transportation Authority (PDRTA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with PDRTA.
- For more information on PDRTA's civil rights program, and the procedures to file a complaint, contact 843-665-2227; email [adixon@pdrta.org](mailto:adixon@pdrta.org); or visit our administrative office at 313 S. Stadium Rd, Florence, SC 29506. For more information, visit [www.pdrta.org](http://www.pdrta.org).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 843-665-2227.



## Appendix B

# PDRTA Title VI Complaint Form

Instructions: If you would like to submit a Title VI complaint to the Pee Dee Regional Transportation Authority (PDRTA), please fill out the form below and send it to PDRTA, Attn: Title VI Coordinator, 313 S Stadium Rd, Florence, SC 29506. For questions or a full copy of PDRTA's Title VI policy and complaint procedures call 843-665-2227 or email [adixon@pdrt.org](mailto:adixon@pdrt.org)

1. Name (Complainant)	
2. Phone:	3. Home Address (Street No., City, State, Zip):
4. If applicable, name of person (s) who allegedly discriminated against you:	
5. Location and Position of person(s) if known:	6. Date of incident:
7. Discrimination because of:  <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin	
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.	

9. Why do you believe these events occurred?	
10. What other information do you think is relevant to the investigation?	
11. How can this/these issue(s) be resolved to your satisfaction?	
12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (Witnesses):  Name:  Address:  Phone:	
13. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?  <input type="checkbox"/> Yes <input type="checkbox"/> NO  If yes, check all that apply:  <input type="checkbox"/> Federal Agency <input type="checkbox"/> State Agency <input type="checkbox"/> Local Agency <input type="checkbox"/> Federal Court <input type="checkbox"/> State Court  If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed:  Agency/Court:  Contact's Name:  Address:  Phone:	
Signature (Complainant):	Date of Filing:

---

### TITLE VI Complaint Tracking Log

\*\*\*When recording a complaint, make sure to include how, when, where and why the complainant believes he or she was discriminated against. Including the location, names and contact information of any witnesses in the 'Complaint Summary' section \*\*\*

[illegible]



### List of Investigations, Lawsuits and Complaints

	Date/Time	Summary (incl. basis of complaint: race, color, or national origin)	Status	Action(s) taken
<b>Investigations</b>				
1.				
2.				
3.				
4.				
5.				
<b>Lawsuits</b>				
1.				
2.				
3.				
4.				
5.				
<b>Complaints</b>				
1.				
2.				
3.				
4.				
5.				

Appendix C

Appendix D

**Limited English Proficiency Households In The Service Area Population**

County/Service Area	Total Population	All Households Estimate	Limited English-Speaking Households			
			Spanish	Other Indo-European	Asian/Pacific Island	Other
Darlington County	67,253	26,592	473	96	54	0
Florence County	138,561	52,051	983	378	306	91
Dillon County	30,871	10,968	297	0	20	153
Chesterfield County	46,024	17,977	1,131	0	5	0
Marion County	31,562	11,538	464	24	48	0
Marlboro County	27,131	9,584	374	21	0	39
<b>Totals</b>	<b>341,402</b>	<b>128,710</b>	<b>3,722</b>	<b>519</b>	<b>433</b>	<b>283</b>
<b>Percent of Totals</b>	<b>100%</b>	<b>37.70%</b>	<b>2.89%</b>	<b>0.40%</b>	<b>0.34%</b>	<b>0.22%</b>

**Total LEP Households In PDRTA Service Areas** 4,957

**% of LEP Households In PDRTA Service Areas** 3.85%

US Census Bureau 2018

## PDRTA Annual LEP Driver Survey

1. Do you regularly encounter limited English-speaking members of the public as part of your job?

Yes ☐ No ☐

2. In a TYPICAL DAY, approximately how many riders/members of the public do you encounter?

3. Of these, approximately how many would you say are unable to communicate well in English?

4. What language do limited English speaking riders/members of the public you encounter speak?

---

5. What services or information are those limited English speaking riders/members of the public TYPICALLY seeking?

---

Appendix E

6. In what specific ways would you suggest improving PDRTA services for limited English riders?

---

7. Do you regularly drive on more than one bus route in PDRTA service areas?

Yes ☐ No ☐

8. In what specific area do you work?

---

---

Name (Print)

---

Date

LANGUAGE IDENTIFICATION FLASHCARD

☐

ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.

1. Arabic

☐

Խնդրում ենք նշում կատարել այս քառակուսում,  
եթե խոսում կամ կարդում եք հայերեն:

2. Armenian

☐

যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।

3. Bengali

☐

ឈ្មួចញ៉ាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។

4. Cambodian

☐

Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.

5. Chamorro

☐

如果你能读中文或讲中文，请选择此框。

6. Simplified Chinese

☐

如果你能讀中文或講中文，請選擇此框。

7. Traditional Chinese

☐

Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.

8. Croatian

☐

Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.

9. Czech

☐

Kruis dit vakje aan als u Nederlands kunt lezen of spreken.

10. Dutch

☐

Mark this box if you read or speak English.

11. English

☐

اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.

12. Farsi

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

- |                          |  |                |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português.                           | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această căsuță dacă citiți sau vorbiți românește.                    | 27. Romanian   |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски.               | 28. Russian    |
| <input type="checkbox"/> | Обележите овај квадратић уколико читате или говорите српски језик.             | 29. Serbian    |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.             | 30. Slovak     |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español.                                    | 31. Spanish    |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog    |
| <input type="checkbox"/> | ให้กาเครื่องหมายลงในช่องดำผ่านถ่านหรือพูดภาษาไทย.                              | 33. Thai       |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.                        | 34. Tongan     |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.         | 35. Ukrainian  |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔                     | 36. Urdu       |
| <input type="checkbox"/> | Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.               | 37. Vietnamese |
| <input type="checkbox"/> | באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.                            | 38. Yiddish    |

**PDRTA Title VI Program Policy**  
**Effective April 1, 2021**

**Ref. FTA Circular 4702.2B Title VI Dependent Guidelines for  
Federal Transit Administration Recipients**

**Purpose:** The purpose of this policy is to establish guidelines to effectively monitor and ensure that PDRTA is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations at 49 CFR Part 21.

**Policy:** PDRTA ensures that its programs, policies, and activities comply with the Department of Transportation's (DOT) Title VI regulations. PDRTA is committed to creating and maintaining public transit service that is free from all forms of discrimination. PDRTA will take whatever preventive, corrective, and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect.

**Required to provide an Annual Title VI certification and assurance.** To ensure accordance with 49 CFR Section 21.7, 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 of the Civil Rights Act of 1964. This requirement shall be fulfilled when the applicant submits its annual certifications and assurances to FTA. The text of FTA's annual certifications and assurances is available on FTA's website. PDRTA complies with this instruction annually in order to receive FTA funding.

**Required to notify beneficiaries of protection under Title VI.** In order to comply with 49 CFR Section 21.9(d), recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protection against discrimination afforded to them by Title VI. Recipients that provide transit service shall disseminate this information to the public through measures that can include but shall not be limited to a posting on the agency's website. PDRTA has information on their website as well as signage posted on all vehicles.

**Required to develop Title VI Complaint Procedures.** In order to comply with 49 CFR Section 21.9(b), recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. Title VI complaints may be filed with the PDRTA Title VI Coordinator.

**Required to record Title VI investigations, complaints, and lawsuits.** In order to comply with 49 CFR Section 21.9(b), recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient that allege discrimination on the basis of race, color, or national origin. This list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint. PDRTA's Title VI Coordinator maintains these files.



Required to provide meaningful access to Limited English Proficient (LEP) persons. Title VI and its implementing regulations require that FTA recipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. The PDRTA website has eight language translations, including a Spanish translation. Also, PDRTA has access to a translation service.

Required to provide additional information upon request. At the discretion of the FTA, information other than that required by the referenced circular may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements. PDRTA's Title VI Coordinator is available to provide additional information as needed and to respond to any inquiry.

Required to prepare and submit a Title VI Program. FTA requires recipients to report certain general information to determine their compliance with Title VI. The collection and reporting of this program constitute the recipients' Title VI Program. To ensure compliance with 49 CFR Section 21.9(b), FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to FTA's regional civil rights officer once every three years.

#### General Reporting Requirements

1. PDRTA conducts public participation /outreach efforts to identify, provide information to, and receive information from minority and low-income persons in the service area. Below is summary of these activities:

PDRTA periodically participates in regularly scheduled monthly community meetings that serve as coordinating councils for social service and human service agencies. These councils are comprised of various agencies who serve a variety of underserved populations throughout our service area. These populations include minorities, low-income persons, individuals with cognitive disabilities, individuals with physical disabilities, single parents, and many more. Long standing councils have continued to meet and discuss issues impacting the above listed groups in Darlington, Chesterfield, Dillon, Chesterfield and Marion Counties.

PDRTA also has a working relationship with all the area housing authorities which houses low-income individuals.

PDRTA partners with Poynor Adult Education in Florence who offers ESL (English as a Second Language) classes to LEP (Limited English Proficiency) adult students in the area. The Title VI Coordinator attends meetings with ESL students and teachers to educate about PDRTA services.

During the process of route development, PDRTA completes studies and works with local officials (Planning Department) to make certain that minorities and low-income individuals will have access to the fixed route public bus system. One area that is included are the low-income housing such as the housing authorities within our counties.

PDRTA Board meetings are open to the public and held on the third Thursday of each month at 6:00pm at our main facility at 313 S. Stadium Road in Florence, SC.

PDRTA conducts “Ridership Surveys” to assess the needs of our riders. Members of the PDRTA staff ride the routes to help distribute, collect, and answer any questions regarding the survey and the services that PDRTA provides. Due to the COVID-19 pandemic, PDRTA did not conduct ridership surveys in 2020 and 2021.

PDRTA participates in Job Fairs and Career Days in the counties throughout our service area. These Job Fairs and Career Days are conducted by the SC Department of Employment and Workforce (SCDEW), local schools, local technical colleges, and other governmental entities and agencies.

PDRTA participates in many local festivals in the counties throughout our service area. This gives us an opportunity to distribute materials about PDRTA, our schedules, our routes, and other important PDRTA information. These festivals usually involve staffing a booth and meeting and greeting persons who come by for information or materials related to our services.

PDRTA has distributed schedules to many businesses throughout the service area including door to door distribution and mail.

PDRTA has been utilizing social media as a form of communication with the public. Pee Dee area residents also have the option to communicate with PDRTA through Facebook and Public Comment email address at [comments@pdrta.org](mailto:comments@pdrta.org). In addition, the PDRTA website ([www.PDRTA.org](http://www.PDRTA.org)) is maintained to provide the public with general information about our operations, schedules, and important PDRTA related information.

2. A copy of the LEP Program for PDRTA is attached. This document includes the Four Factor Analysis.
3. Any person who believes she or he has been subjected to unlawful discrimination under any Pee Dee Regional Transportation Authority service, program or activity, and believes she or he has been discriminated against on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the PDRTA’s Title VI Complaint Form. PDRTA follows Title VI complaint procedures and tracking process. Complaint Form (Appendix B) and Complaint Logs (Appendix C) are attached.

There have been no Title VI investigations, complaints, or lawsuits filed with PDRTA since the submission of the last update.

4. A copy of PDRTA’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint, including LEP instructions, is attached. PDRTA posts the Title VI Policy Statement on our website, as well as on our

buses, bulletin boards, our transit center and our Lobby.

5. Demographic Table: PDRTA does not have any non-elected committees and councils.
6. Sub-Recipients: PDRTA does not have any Sub-Recipients.
7. PDRTA held a board meeting on March 18, 2021. The minutes are attached showing the board approved the Title VI Program effective April 1, 2021.

### Discrimination

Discrimination is any act or omission of an act which would prevent the use or exclude a person from access to public transportation based on (but not limited to) race, sex, disability, or religion.

### Responsibilities

All employees of PDRTA shall follow the intent of these guidelines in a manner that reflects agency policy.

Supervisors and managers receiving information regarding violation(s) of this order shall determine if there is any basis for the allegation and shall proceed with resolution as stated in the sections Supervisor Responsibility and/or Investigation of Complaints and Appeal Process.

### Supervisory Responsibility

Each supervisor and manager shall:

- A) Ensure that there are no barriers to service or accommodation that would prevent public transit access or usage.
- B) Train subordinates as to what constitutes discrimination and barriers to access.
- C) Take prompt and appropriate action to avoid and minimize the incidence of any form of discrimination.
- D) Notify the PDRTA Title VI Coordinator in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day.

### Investigation of Complaints and Appeals Process

Various methods of resolution exist. If a customer feels that his/her accommodation request and/or access to public transportation was denied, she/he may file a complaint through the following process:

Submit the complaint, in writing, within 180 days of the alleged discrimination to the PDRTA Title VI Coordinator. A copy of the Title VI complaint form is available by:

- 1) calling (843) 665-2227.
- 2) Contact the PDRTA Title VI Coordinator at 843-519-0884.
- 3) E-mail the PDRTA Title VI Coordinator at [adixon@pdrta.org](mailto:adixon@pdrta.org).
- 4) Come in to the PDRTA office located at 313 S. Stadium Road Florence, S.C. 29506.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

The Title VI Coordinator will be notified of all Title VI complaints, reviews the complaints and informs the Executive Director and appropriate Department Director. PDRTA investigates complete complaints received no more than 180 days after the alleged incident. Once a complaint is received, the Title VI Coordinator will initially contact the complainant within 72 hours to confirm the receipt of the complaint and request more information if needed to resolve the case.

If PDRTA requires more information to investigate the case, the complainant has 10 business days from the date of the request to send information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information requested within 10 business days, PDRTA can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After 14 business days from the date of the initial contact, the investigator reviews the complaint, and 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. An 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 60 days after the date of the letter or the LOF to do so.

#### Disposition of Complaints

**Sustained Complaints** - If the complaint is substantiated, this policy and procedure prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to the agency disciplinary procedures.

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

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

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

  
Don Strickland  
Executive Director

3-18-2021  
Date

Pee Dee Regional Transportation Authority

Board of Directors Meeting Minutes

22 March 2021

**Members Present:** James Jackson, Gerald Miller, Carolyn Gause, Tyron Jones, Shelia Brewington,

**Members Absent/Web Viewing:** Jacqueline Ellerbe-Shannon, Judy Alexander, Vivian Rogers, George Jebaily, Adell McManus-McCoy, Rebecca M. Gamble, Belva Britt

**Staff Present:** Don Strickland and Samantha Mack

**Guests:** None

A. Chairman Jackson called the meeting to order at 6:08 PM

B. Invocation was given by Tyron Jones.

C. **Approval of the Agenda:**

Approval of the Agenda was motioned, seconded, and unanimously approved.

D. **Approval of the November Meeting Minutes:**

Approval of the minutes from February 18, 2021 was motioned, seconded, and unanimously approved.

E. **Public Comments:** None.

F. **Operations Report/Update on Covid-19 Impacts:**

Don discussed the Board Meeting Report and explained we are at the height of the Co-Vid 19 related impacts. Ridership is down 42% from Feb 2020. Florence transit is down 45% with a similar trend occurring in all areas. Fuel cost rising 20% could provide a bump to ridership. Demand response in all areas has also risen and provide numbers like those of last year. Don explained that Harbor Freight is still a new service and plans are in place to grow the ridership. Cheraw services have grown slightly in February as the first full month in service. Don explained that February is a shorter month with a Saturday less than February 2020 and the single day can impact the ridership numbers.

Don explained that meetings are scheduled in Florence County and other municipalities to discuss methods of increasing ridership, funding, and additional services PDRTA may provide. Tyron Jones questioned the impact of vaccinations regarding employees

returning to work. Don explained that the main impacts we are experiencing is from the hospitality industry. Don also explained that the educational trips from FDTC, Marion, and Poynor are all down across the board. CareSouth provides exposure and diagnostic statistics that should a downward trend so the hope is that ridership will increase as the communities are provided with vaccines. Don also explained that the healthcare facilities that are partners understand the decreased ridership because they too experience lower patient appointments due to the risk of exposure.

**G. HR Report/Newsletter:**

Don explained to the board that we currently have 49 employees with several positions open. By the next board meeting, we have over 50 employees. Don also explained our reporting costs will change once we exceed the fiftieth employee. The HR newsletter provides birthdays and HR tips and displays Tammy Moses in the Employee Spotlight. Don explained that Tammy has been a correctional officer for many years and plans are building to possibly utilize her skills at the Florence Transit Center. Don also explained the current plans and needs for the FTC and how those changes could positively impact our riders and operations moving forward.

**H. Authorizations:**

**Procurement Policy #400 Update:**

Don explained the reasoning for the update and how the procurement thresholds impact the timeline of projects and procurement process. Don read the current and proposed thresholds and explained the differences between the thresholds. The time requirement for all SCBO advertisements will be reduced from 21 days to 10 days. This allows the procurement process to move along quickly. Don also explained how exceeding 50 employees will impact our dealings with vendors and how the increase in threshold allows us to avoid excessive and unnecessary solicitations.

Approval of the Procurement Policy #400 Update was motioned, seconded, and unanimously approved.

**Title VI Policy Update with New Standards:**

Don explained that the Title VI is a 3-year program that requires adjustments at the term of each program. The Title VI program covers the anti-discriminatory categories such as race, age, sex, etc. Don explained that we have Title VI compliance stickers on each bus for public display. Don explained that the compliant tool has been adjusted to be more user friendly and it will be accessible from the new website. Don also explained the services areas were also adjusted to include all six counties. Don also explained the seated capacity, load factor, and standing room only for our fleet and require adjustment

for the removal of decommissioned fleet and the acquisition of new fleet. Don also disclosed a goal for the Title VI Program is to include public outreach, so community members learn about Title VI.

Don also explained that all schedules have been printed in Spanish and the new website will have several accessibility options to assist with any Title VI coverages.

Approval of the EEO Policy Statement update from 2018 was motioned, seconded, and unanimously approved.

I. **Committee Report:** None.

J. **Old Business:** None

K. **New Business:** None.

L. **Executive Director's Comments:**

Don shared that Ms. Cheryl Gibbons did exceptionally well with the TASC conference's ADA course and "ADA Guru" this year. Cheryl was also nominated for and won the Rural TASC Support Employee of the Year. The entire maintenance team won the Urban TASC Support Team of the Year. Don also disclosed the awards/trophies will arrive within the next week and pictures and media coverage will be taken. Don also disclosed the Employees of the Month for February.

Don informed the board of the different opportunities PDRTA has to gain partners in the various areas. Don expressed his appreciation to the board and thanked them for their guidance and support of confidence to build on PDRTA's goals.

M. **Chairman's Comments:**

Mr. Jackson would like permission from the other board members to meet with Don regarding his evaluation. Board members approved.

N. Meeting was adjourned by Chairman Jones at 6:51 PM.

Respectively submitted,



Don Strickland