



***Federal Transit Administration
Title VI Program***
Cherokee Area Transit Service (CATS)
August 20, 2024 of Plan Approval
Expires August 20, 2027

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The Cherokee Area Transit Services (CATS) Title VI plan includes the following elements:

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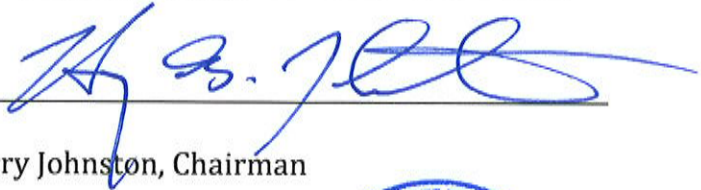
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Section 1: Title VI Plan Approval

Title VI Plan Adopted on: 8/20/2024

Adopted by: Cherokee County Board of Commissioners

Signature(s):



Approval:

Harry Johnston, Chairman



Section 2: Title VI Policy Statement

Policy Statement

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

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Cherokee Area Transit Service (CATS)

- Cherokee Area Transit Area Services (CATS) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Cherokee Area Transit Services (CATS).
- For more information on Cherokee Area Transit Service (CATS) civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Opie Bowen, Title VI Coordinator
678-493-6000, (TTY 800-255-0056)

Email: odbowen@cherokeecountyga.gov;

Or visit our administrative office at

1130 Bluffs Pkwy, Canton, GA, 30114

For more information, visit www.cherokeecountyga.gov

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

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
- If information is needed in another language, contact **770-345-6238**.

The **Cherokee Area Transit Service (CATS)** Notice to the Public is posted in the following locations:

1. Driver's Room
2. Reception's Desk
3. Website cherokeecountyga.gov/transportation
4. Transit Vehicles

Sample Title VI Notice to the Public in Spanish

Notificación al Público de Derechos Bajo el Título VI

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

Opie Bowen, Coordinador del Título VI

678-493-6000, (TTY 800-255-0056)

Correo electrónico: odbowen@cherokeecountyga.gov;

O visite a nuestra oficina administrativa en:

1130 Bluffs Pkwy, Canton, GA, 30114

Para más información, visite a: **www.cherokeecountyga.gov**

Para asuntos relacionados con el Título VI relacionados con el transporte, también se puede presentar una queja directamente ante la Oficina de Igualdad de Oportunidades en el Empleo de GDOT: Enlace del Título VI, 600 West Peachtree Street N.W. Atlanta, GA 30308; por teléfono: 404-631-1972; TTY: 711 o correo electrónico: civilrights@dot.ga.gov

o, a:

- Administración Federal de Tránsito (FTA), Oficina de Derechos Civiles, Director East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 770-345-6238.

Section 4: Title VI Complaint Procedure

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by Cherokee Area Transit Service (CATS) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

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

A complaint must be filed with Cherokee Area Transit Service (CATS) no later than 180 days after the following:

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

Once the complaint is received, Cherokee Area Transit Service (CATS) will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Cherokee Area Transit Service (CATS) has 45 days to investigate the complaint. If more information is needed to resolve the case, the Cherokee Area Transit Services (CATS) may contact the complainant requesting further information. The complainant has **15** 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 **15** business days, Cherokee Area Transit Service (CATS) can administratively close the case.

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

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

If the complainant wishes to appeal the decision it must direct the appeal back to the agency. The complainant has 30 days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). The appeal process information will be included in the letter.

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

Opie Bowen, Title VI Coordinator
678-493-6000, (TTY 800-255-0056)
Email: odbowen@cherokeecountyga.gov ;
Or visit our administrative office at
1130 Bluffs Pkwy, Canton, GA, 30114.

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

Or

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

If information is needed in another language, please contact **(770) 345-6238**.

*Si necesita información en otro idioma, por favor llame **(770) 345-6238**.*

Sección 4: Procedimiento de queja del título VI

Cualquier individuo, grupo de individuos o entidad que crea que ha sido discriminado por motivos de raza, color u origen nacional por parte del Cherokee Area Transit Service (CATS) puede presentar una queja del Título VI completando y enviando el Formulario de queja del Título VI de la agencia. .

Si el demandante no puede poner la queja por escrito, comuníquese con el Coordinador del Título VI utilizando la información a continuación, y un miembro del personal lo ayudará a dictar la queja o le brindará otra asistencia necesaria.

Cualquier persona que haya presentado una denuncia o haya participado en la investigación de una denuncia no estará sujeta a ninguna forma de intimidación o represalia. Las personas que tengan motivos para pensar que han sido sometidas a intimidación o represalias pueden presentar una denuncia por represalias siguiendo el mismo procedimiento para presentar una denuncia por discriminación.

Se debe presentar una queja ante Cherokee Area Transit Service (CATS) a más tardar 180 días después de lo siguiente:

1. La fecha del presunto acto de discriminación; o
2. La fecha en que la(s) persona(s) tomó conocimiento de la presunta discriminación; o
3. Cuando haya habido una conducta continuada, la fecha en que se interrumpió esa conducta o la última instancia de la misma.

Una vez recibida la queja, Cherokee Area Transit Service (CATS) la revisará para determinar si nuestra oficina tiene jurisdicción. Se enviará una copia de cada queja del Título VI recibida al Coordinador del Título VI de la agencia. El denunciante recibirá una carta de acuse de recibo informándole si nuestra oficina investigará la denuncia.

Cherokee Area Transit Service (CATS) tiene 45 días para investigar la denuncia. Si se necesita más información para resolver el caso, Cherokee Area Transit Services (CATS) puede comunicarse con el denunciante para solicitar más información. El denunciante tiene 15 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el denunciante no se comunica con el investigador o no recibe la información adicional dentro de los 15 días hábiles, Cherokee Area Transit Service (CATS) puede cerrar administrativamente el caso.

Después de que el investigador revise la queja, la agencia emitirá una de dos (2) cartas al demandante: una carta de cierre o una carta de conclusión (LOF).

- ✓ Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará.

- ✓ Una carta de conclusión (LOF) resume las acusaciones y las entrevistas sobre el presunto incidente y explica si se tomará alguna medida disciplinaria, capacitación adicional del miembro del personal u otra acción.

Si el demandante desea apelar la decisión, debe dirigir la apelación nuevamente a la agencia. El denunciante tiene 30 días después de recibir la carta de cierre o la carta de conclusión para hacerlo. La apelación será investigada y decidida por una parte distinta del Coordinador del Título VI (u otro funcionario que emitió la decisión inicial). La información del proceso de apelación se incluirá en la carta.

Las quejas escritas sobre el Título VI, o cualquier pregunta sobre las protecciones del Título VI, deben enviarse a:

Opie Bowen, Title VI Coordinator
678-493-6000, (TTY 800-255-0056)
Email: odbowen@cherokeecountyga.gov ;
O visite nuestra oficina administrativa en
1130 Bluffs Pkwy, Canton, GA, 30114.

Para asuntos relacionados con el Título VI relacionados con el transporte, también se puede presentar una queja directamente ante la Oficina de Igualdad de Oportunidades en el Empleo del GDOT: Enlace del Título VI, 600 West Peachtree Street N.W. Atlanta, GA 30308; Vía teléfono: 404-631-1972; TTY: 711 o correo electrónico: civilrights@dot.ga.gov

o

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

Si necesita información en otro idioma, por favor llame (770) 345-6238.

Section 5: Title VI Complaint Form

Cherokee Area Transit Service (CATS) Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

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

Title VI: ☐ Race ☐ Color ☐ National Origin

Other (specify): _____

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

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Civil Rights related complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes

☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court _____

☐ State Court _____

☐ State Agency _____

☐ Local Agency _____

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below

Signature

Date

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

Cherokee Area Transit Service (CATS)
Opie Bowen, Title VI Coordinator
1130 Bluffs Pkwy
Canton, GA 30114
678-493-6000
odbowen@cherokeecountyga.gov

Cherokee Area Transit Service (CATS)

Formulario de Queja del Título VI

Sección I:

Nombre:

Dirección:

Teléfono (casa):

Teléfono (Trabajo):

Dirección de correo electrónico:

¿Requisitos de formato
accesible?

Letra grande
TDD

Cinta de audio
Otro

Sección II:

¿Está presentando esta queja en su propio nombre?

Sí*

No

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

De lo contrario, proporcione el nombre y la relación de la
persona por la que se queja:

Por favor, explique por qué ha presentado la solicitud
para un tercero:

Confirme que ha obtenido el permiso de la parte agraviada si
presenta la solicitud en nombre de un tercero.

Sí

No

Sección III:

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

Título VI: ☐ Raza ☐ Color ☐ Origen Nacional

Otros (especifique): _____

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

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

Sección IV

¿Ha presentado previamente una queja relacionada con los Derechos Civiles ante esta agencia?

Sí

No

Sección V

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

☐ Sí ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal: _____

☐ Tribunal Federal _____ ☐ Agencia Estatal _____

☐ Tribunal Estatal _____ ☐ Agencia Local _____

Si está marcado como Sí en la Sección V, proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:
Teléfono:
Sección VI
Nombre de la agencia La queja es contra:
Persona de contacto:
Título:
Número de teléfono:

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

La firma y la fecha requeridas a continuación

Firma

Fecha

Envíe este formulario en persona a la dirección que se indica a continuación, o envíelo por correo a:

Cherokee Area Transit Service (CATS)
Opie Bowen, Coordinador del Título VI
1130 Bluffs Pkwy
Canton, GA 30114
678-493-6000
odbowen@cherokeecountyga.gov

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

The Cherokee Area Transit Service (CATS) maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- ☒ There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- ☐ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Section 7: Public Participation Plan

Cherokee Area Transit Service (CATS)'s *Public Involvement Philosophy*

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

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

The agency embraces several specific goals:

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

Strategies and Desired Outcomes

To promote inclusive public participation, Cherokee Area Transit Service (CATS) will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement

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

In addition to these general strategies, Cherokee Area Transit Service (CATS) has also employed these specific strategies or activities:

- Survey on both on Demand Response and Micro-transit annually
- Legal advertisements in local newspapers

Public Outreach Activities

The public outreach and involvement activities conducted by Cherokee Area Transit Service (CATS) since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Cherokee Area Transit Services (CATS) Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
	CATS	Distribution of agency brochures		
	CATS	Social Media outlets		
	CATS	Advertising or postings in another language		

Section 8: Four Factor Analysis and LEP Data

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

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

Background

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

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

Framework for Deciding when Language Services are Needed

Cherokee Area Transit Service (CATS) will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

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

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Cherokee Area Transit Service (CATS)

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

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

Service Area Overview

Cherokee Area Transit Service (CATS) service area encompasses Cherokee County. Home to 266,389 people spread over 421 square miles, the service area's population speaks 9 different language groups. However, the overall numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 5.3% of the

population of residents, report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	<i>Cherokee County, Georgia</i>	<i>Percentage</i>
<i>Label</i>	<i>Estimate</i>	
TOTAL	266,389.00	
<i>Speak English AND SPANISH less than "very well"</i>	<i>10,430</i>	<i>3.92%</i>
<i>Speak English AND GERMAN less than "very well"</i>	<i>286</i>	<i>0.11%</i>
<i>Speak English AND RUSSIAN less than "very well"</i>	<i>99</i>	<i>0.04%</i>
<i>Speak English AND OTHER INDO-EUROPEAN less than "very well"</i>	<i>786</i>	<i>0.30%</i>
<i>Speak English AND KOREAN less than "very well"</i>	<i>494</i>	<i>0.19%</i>
<i>Speak English AND CHINESE less than "very well"</i>	<i>399</i>	<i>0.15%</i>
<i>Speak English AND VIETNAMESE less than "very well"</i>	<i>389</i>	<i>0.15%</i>
<i>Speak English AND ASIAN AND PACIFIC ISLAND less than "very well"</i>	<i>844</i>	<i>0.32%</i>
<i>Speak English AND OTHER less than "very well"</i>	<i>327</i>	<i>0.12%</i>

<https://data.census.gov/cedsci/> **Table C16001**

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice's Safe Harbor Provision. This provision outlines circumstances that can provide a "safe harbor" for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for

each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient's written translation obligations.

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

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

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Cherokee County is home to 10,430 people (3.92% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

The number of people who speak German and English less than very well all comprise under 0.11% of the population each. The number of people who speak Russian and English less than very well all comprise under 0.04% of the population each. The number of people who speak Other Indo-European and English less than very well all comprise under 0.30% of the population each. The number of people who speak Korean and English less than very well all comprise under 0.19% of the population each. The number of people who speak Chinese and English less than very well all comprise under 0.15% of the population each. The number of people who speak Vietnamese and English less than very well all comprise under 0.15% of the population each. The number of people who speak Asian and Pacific Island and English less than very well all comprise under 0.32% of the population each.

The number of people who speak Other languages and English less than very well all comprise under 0.12% of the population each.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, Cherokee Area Transit Service (CATS) designates the following as Vital Documents which be translated to LANGUAGE: Spanish. Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Complaint Form, and Reasonable Modification Request Form.

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

Analyzing responses from our drivers between 2020 and 2022, we found that English and Spanish were the most commonly encountered languages. No issues were reported concerning Limited English Proficiency (LEP) individuals. However, 14 out of 39 respondents over the three-year period expressed a need for further training in this domain. Consequently, we have enhanced our training programs to include additional sessions on serving LEP individuals effectively. All new hires now undergo LEP training as part of their onboarding process. We are committed to conducting annual surveys among our drivers and office staff to ensure that our practices remain aligned with the latest data and needs.

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

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

Finally, Cherokee Area Transit Services (CATS)'s planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that Cherokee Area Transit Services (CATS) has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, Cherokee Area Transit Service (CATS) staff members who speak Spanish or any other foreign languages can be consulted or utilized for translation or interpretation in informal or emergency situations. In the event assistance in a rare language is needed, Cherokee Area Transit Service (CATS) can reach out to local colleges or universities to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning an interpreter is needed.

Cherokee Area Transit Service (CATS) recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with us in another language, Our agency employees have access to a telephonic interpretation service called Lion Bridge. This is a service provided by Department of Human Service (DHS).

Finally, Cherokee Area Transit Services (CATS) will pay for document translation services when needed, which generally costs about \$25-\$35 per page. Or have translation reviewed by a County employee who is proficient in the language.

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

Section 9: Language Assistance Plan

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

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

The **Cherokee Area Transit Services (CATS)**'s Language Assistance Plan includes the following elements:

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

Four Factor Analysis Results: LEP Populations Served

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

he data above shows that just one language meets the Safe Harbor threshold—Spanish. Cherokee County is home to 10,430 people (3.92% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

The number of people who speak German and English less than very well all comprise under 0.11% of the population each. The number of people who speak Russian and English less than very well all comprise under 0.04% of the population each. The number of people who speak Other Indo-European and English less than very well all comprise under 0.30% of the population each. The number of people who speak Korean and English less than very well all comprise under 0.19% of the population each. The number of people who speak Chinese and English less than very well all comprise under 0.15% of the population each. The number of people who speak Vietnamese and English less than very well all comprise under 0.15% of

the population each. The number of people who speak Asian and Pacific Island and English less than very well all comprise under 0.32% of the population each.

The number of people who speak Other languages and English less than very well all comprise under 0.12% of the population each.

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

The Cherokee Area Transit Services (CATS) has identified, developed, and uses the following:

- a) Designated Vital Documents written in Spanish
- b) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- c) The Cherokee Area Transit Services (CATS) has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- d) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.
- e) Cherokee County’s website includes a Google Translation widget.

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

In order to ensure that LEP individuals are aware of Cherokee Area Transit Services (CATS)’s language assistance measures, Cherokee Area Transit Services (CATS) provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.
- The agency’s website includes language stating, “If you need assistance or information in another language, please contact (770) 345-6238 .” This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.

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

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

Updates will continue to include 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 local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Cherokee Area Transit Services (CATS)'s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Cherokee Area Transit Services (CATS) has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Cherokee Area Transit Services (CATS)'s failure to meet the needs of LEP individuals

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

The following training will be provided to Cherokee Area Transit Service (CATS) staff:

- Information on the Cherokee Area Transit Services (CATS) Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website

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

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

Log of LEP Encounters

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

Section 10: Minority Representation Information

Cherokee Area Transit Service (CATS) does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

☒ No, the agency does not have subrecipients.

☐ Yes. If yes, list the subrecipient names: (list other agency names here)

Cherokee Area Transit Services (CATS) monitors subrecipients using the following process:

1. Cherokee Area Transit Services (CATS) uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Cherokee Area Transit Services (CATS) collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 12: Title VI Equity Analysis for Facility Acquisition

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

☐ No, the agency has not built a facility.

☒ Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

Section 13: Fixed Route Transit Providers Service Standards and Policies

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

Cherokee Area Transit Services (CATS):

☐ is a fixed route transit provider

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

CATS FACILITY DEVELOPMENT

FACILITY EQUITY ANALYSIS

SEPTEMBER 6, 2022



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INTRODUCTION & PURPOSE

Cherokee Area Transportation System (CATS) is seeking to build a new office for CATS staff and storage facility for bus inventory. When planning a new facility, Federal Transit Administration (FTA) funding recipients are required to conduct a Facility Equity Analysis. The purpose of the analysis is to assess the potential equity impacts of these facilities and ensure site selection is conducted in a non-discriminatory manner, without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Under Title VI, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

CATS last updated its Title VI Plan in 2021 and described its process for conducting equity analysis in section 9.0 of that document. FTA Circular 2702.1B provides guidance to FTA funding recipients regarding required activities to ensure compliance with all areas of Title VI.

PROJECT DESCRIPTION

STUDY AREA

Figure 1 presents the proposed site and surrounding study area for this memorandum. The site is approximately 6.6 acres across two parcels, both of which are owned by Cherokee County. The site is located at the corner of Univeter and Pinecrest Roads within Census Tract 907.03, Block Group 3.



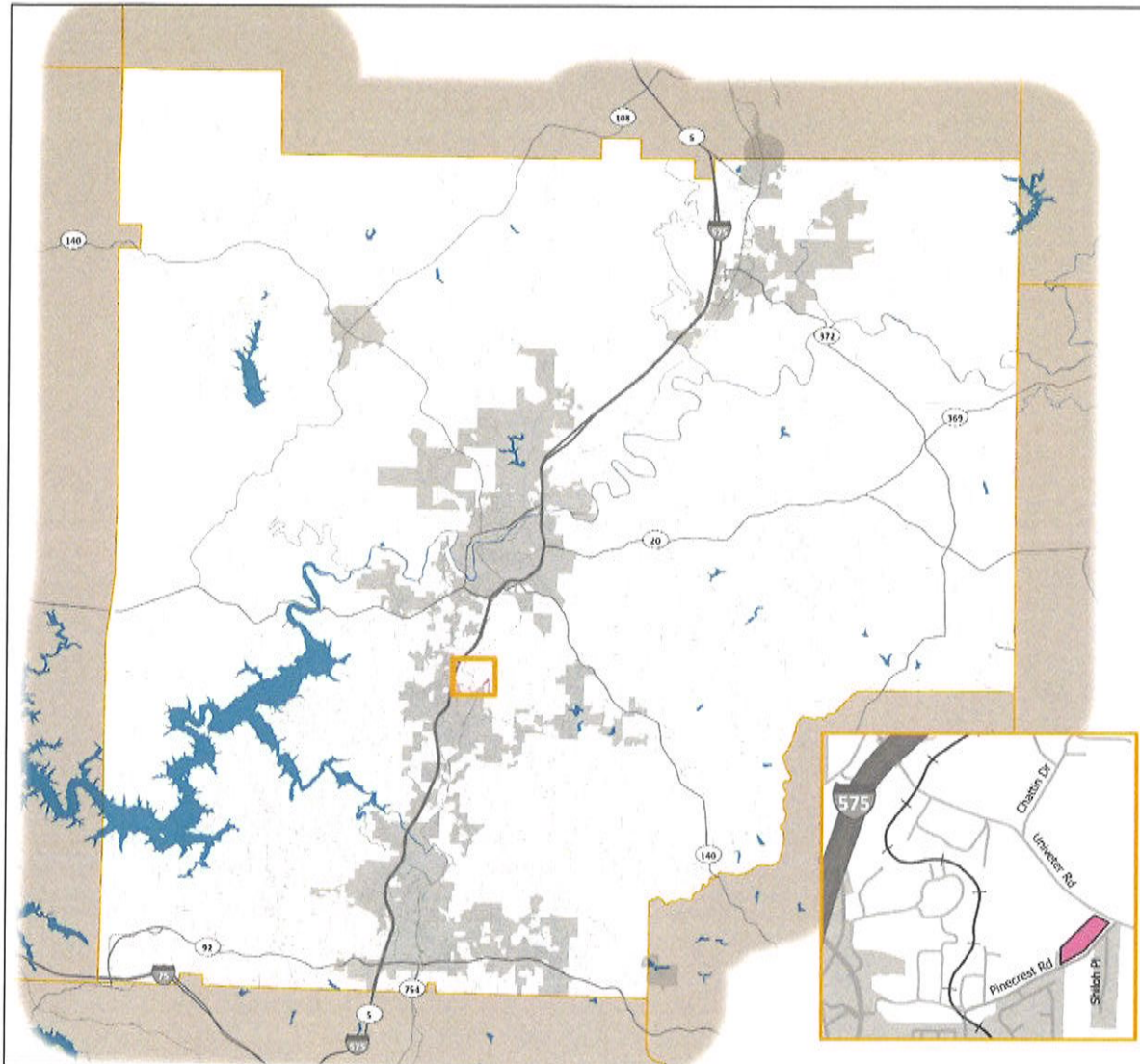


Figure 1: Potential Facility Site

SITE SELECTION CRITERIA

Selection criteria included being county ownership, size, configuration, and accessibility to the County-owned Fleet Maintenance facility located at 421 Chattin Drive in Canton. The maintenance facility is 0.6 mile from the existing CATS office and storage site and approximately 0.7 miles from the proposed site. Race, color, and national origin of residents were not considered during the identification or evaluation of potential sites.



ALTERNATIVES

CATS studied potential locations and reviewed available properties that would have the adequate space for the facility and that the County already owns. CATS considered all properties that had enough space for the facility. All other available county parcels were determined to be infeasible due to constraints in location, size, or geometry.

For the purpose of comparison to the preferred site in this analysis, an alternate site was identified. This parcel is located beside the Fleet Maintenance Department at 421 Chattin Drive in Census Tract 906.06, Block Group 3. It is located 0.8 miles from the preferred site. Figure 2 presents the alternative site and its surrounding context.



Figure 2: Alternate Site for Comparison

A comparison of site impacts found that neither the preferred nor the alternative site will require displacement of residents or businesses. Both are located near existing facilities with like uses of similar size/scale to the proposed facility (Table 1).

Table 1: Site Impacts

	Preferred Site	Alternate Site
Will selection require displacement of residents or businesses?	No	No
Similar facilities nearby	Killian's Automotive and vehicle storage	County Fleet Maintenance



EQUITY ANALYSIS

CATS analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. CATS compared the Census Block Groups within which the preferred and alternate sites are situated to the county.

RACE AND ETHNICITY MAKE-UP

The most prominent race in Cherokee County are those who identify as White. Since 2010, the largest increases in Cherokee County population came from minority races and ethnicities. Spatially, these minority populations are concentrated along the I-575 and SR 92 corridors and in the cities of Canton, Holly Springs, and Woodstock. Per the 2020 ACS, Cherokee County has a minority (nonwhite) population of 37,687, or 15 percent. The preferred site is in a Block Group with minority population of 10 percent. The alternate site's minority population is 13 percent. Both are lower than the county overall (Table 2).

Table 2: Race (ACS 2020 5-Year Estimates Table B020001)

Race	Preferred Site	Alternate Site	Cherokee County
White	90%	87%	85%
Minority	10%	13%	15%

INCOME AND POVERTY

Both the preferred and alternate sites are in Census Block Groups where the percent of households with income below poverty is slightly lower than the county overall (Table 3). The preferred site is in a Block group where the median household income is \$73,750; the alternate site, \$71,806. The Cherokee County median income is \$84,817.

Table 3: Income and Poverty (ACS 2020 5-Year Estimates Table B19013)

Ratio of Income to Poverty	Preferred Site	Alternate Site	Cherokee County
Under 1	5%	6%	7%
1.00 to 1.99	20%	37%	13%
2.00 or over	75%	57%	80%
Median Household Income	\$73,750	\$71,806	\$84,817

LIMITED ENGLISH PROFICIENCY

Per the 2020 ACS 5-year estimates, about 2 percent of the County's households report Limited English Proficiency (LEP). In the preferred site's Block Group, all 398 households speak English only. In the alternate site's block group, there are 469 total households: 389 speak English only, and 80 households speak Spanish but are not limited-English speaking households. Therefore, both sites are in block groups with 0 percent LEP households, lower than the county overall (Table 4).



Table 4: Household Limited English Speaking Status (ACS 2020 5-Year Estimates Table C16002)

Household Limited English Speaking Status	Preferred Site	Alternate Site	Cherokee County
Non-Limited English Speaking Households	100%	100%	98%
Limited English Speaking Households	0%	0%	2%

CUMULATIVE IMPACTS

When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.

The parcel is in unincorporated Cherokee County. Figure 3 shows the existing Cherokee County land use in the vicinity of the site. The parcel is currently split between Agriculture, Forestry, Fishing, and Hunting and Private Households existing land uses. The site is also bordered by Manufacturing and Wholesale Trade land use across the street.

The majority of the area surrounding the site is designated for Private Households. Other prominent land uses include Agriculture, Forestry, Fishing, and Hunting, Other Government Functions, Manufacturing and Wholesale Trade and General Sales or Service.

Immediately adjacent to the preferred site is the Cherokee County Division of Family & Children Services (DFCS) Office. Just northwest of that is Richard (Hunky) Mauldin Park. Across Univeter Road is Killian Automotive and vehicle storage.

The County recently completed improvements at the corner of Univeter and Pinecrest Roads. The project included intersection realignment to improve sight distance from Pinecrest Road and the installation of a left-turn lane on Univeter Road at Pinecrest Road. These improvements may mitigate traffic impacts from the proposed facility at the preferred site and support bus ingress and egress at the facility.

The alternate site is similarly situated among other county uses, including the existing Fleet Maintenance Facility, the Cherokee County Adult Detention Center, and the Cherokee County Animal Shelter Intake Facility and Barn.



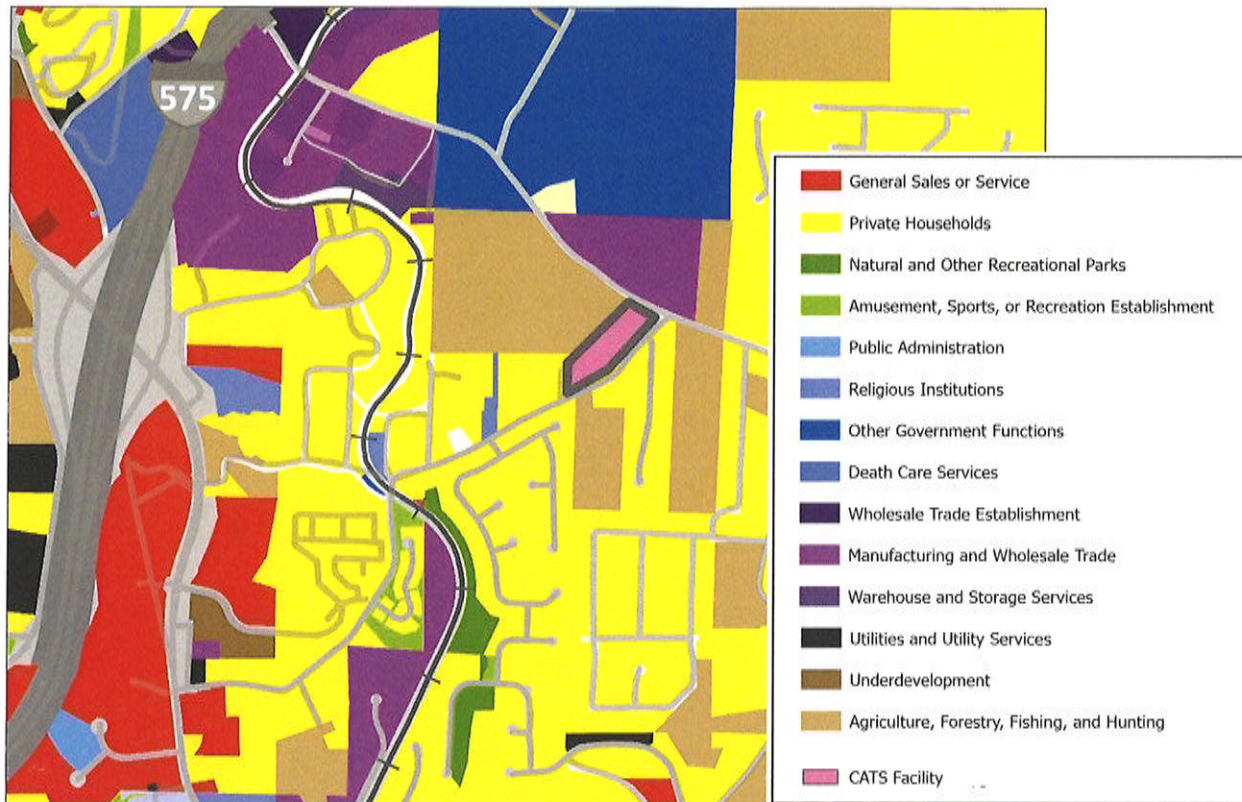


Figure 3: Existing Land Use

PUBLIC OUTREACH

No public outreach has yet been conducted as to the location of the proposed facility. It is recommended that public outreach be conducted to persons potentially impacted by the siting of the facility before any further work is completed. Outreach to residents along Pinecrest/Shiloh Road and Shiloh Place will be especially important, as there may be real or perceived traffic impacts at the corner of Pinecrest and Univeter Roads because of the facility placement.

CONCLUSIONS

The site identified for the construction of the new CATS facility was selected without regard to race, color, or national origin. An evaluation of the poverty rate, minority population rate, and LEP rate in the vicinities of the site shows no potential disparate impact. This conclusion is based on the preferred site's location in a Census Block Group with slightly lower percentage of minority populations, lower median income, and slightly lower rates of LEP households than countywide averages. However, public outreach must be completed before the preferred site is selected to complete the equity analysis.



[illegible]

New Administration Building Location
Public Comment
8/13//2024 5-6pm

1. Introductions
2. View Maps of the location of the new CATS facility
3. Current Status Update of project
4. Q&A

New Administration Building Location
Public Comment Meeting Minutes
8/13//2024 5-6pm

1. Introductions
2. View Maps of the location of the new CATS facility
3. Current Status Update of project
4. Q&A

We had no comments or concerns during the meeting. The meeting was posted on the cherokeega.com website as well as the Cherokee Tribune legal ad. No comments were received through e-mail to Greg Powell about the new location of the new CATS building.

CHEROKEE TRIBUNE

521 East Main Street, Canton, Georgia 30114

PUBLISHER'S AFFIDAVIT

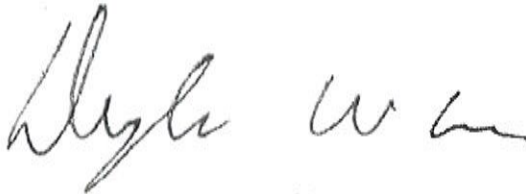
STATE OF GEORGIA - County of Cherokee

Before me, the undersigned; a Notary Public, this day personally came Douglas W. Crow, who, being duly sworn, according to law, says that he is the Vice President of Operations, Times Journal, Inc., of the CHEROKEE TRIBUNE, official newspaper published in said county and State, and that the publication, of which the annexed is a true copy, was published in said paper, as provided by law, on the following dates:

08/08/2024

Ad No.: 427019

Subscribed and sworn to before me this 8th day of August, 2024



Douglas W. Crow, Vice President of
Operations, Times Journal Inc.



Notary Public

My commission expires _____



Ad text :

TCT7005

gpn05

NOTICE OF PUBLIC COMMENT

CHEROKEE AREA TRANSIT

SERVICE (CATS)

NEW ADMINISTRATION BUILDING LOCATION

In compliance with FTA Title VI public outreach guidance Cherokee Area Transit Service (CATS) is seeking public comment specifically to residents along Pinecrest/ Shiloh Road and Shiloh place on the building of a CATS Administration Facility located on the corner of Pinecrest and Univeter Road. We invite you to Cherokee County Senior Center at 1001 Univeter Rd. Canton, GA 30115 on August 13th at 5:00PM-6:00PM.

Written comments about the new administration building location should be submitted no later than fifteen (15) days from the date of this publication to:

Greg Powell,
CATS Director
884 Univeter Rd.
Canton, GA 30115
770-345-6238
8:8,2024