

McCormick Senior Center



Title VI Plan

Adopted: May 31, 2018

Updated: May 17, 2024



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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

McCormick Senior Center assures the South Carolina Department of Transportation (SCDOT) that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

McCormick Senior Center further agrees to the following responsibilities with respect to its programs and activities:

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

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

Signatures: _____

Printed Name: Becky Powell Moon
Executive Director

Oscar New
Board Chairman

Date

2.0 Introduction & Description of Services

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

McCormick Senior Center is a sub-recipient of federal funds and provides service in McCormick County, SC. A description of the current McCormick Senior Center system is included in Appendix B.

Title VI Liaison

Ms. Beth Gable
McCormick Senior Center
Director of Operations
bethgable@mcsc-mat.org
(864) 852-3751
1421 South Main Street
P.O. Box 684
McCormick, SC 29835

Alternate Title VI Contacts

Mr. Josh Bentley
McCormick Senior Center
Associate Director
joshbentley@mcsc-mat.org
(864) 852-3758
1421 South Main Street
P.O. Box 684
McCormick, SC 29835

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

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by SCDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

McCormick Senior Center is not a first-time applicant for FTA/SCDOT funding.

2.2 Annual Certifications and Assurances

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

McCormick Senior Center will remain in compliance with this requirement by annual submission of certifications and assurances as required by SCDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received SCDOT concurrence on June 14, 2024. The Plan was approved and adopted by McCormick Senior Center Board of Directors during a meeting held on??. A copy of the meeting minutes and SCDOT concurrence letter is included in Appendix C of this plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of McCormick Senior Center's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of McCormick Senior Center's office(s) including the reception desk and meeting rooms, and on the McCormick Senior Center's website at www.mcsc-mat.org. Additionally, McCormick Senior Center will post the notice at stations, stops and on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

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

Once the complaint is received, McCormick Senior Center will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

McCormick Senior Center has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, McCormick Senior Center may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, McCormick Senior Center can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on McCormick Senior Center's website www.mcsc-mat.org.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on McCormick Senior Center's website www.mcsc-mat.org.

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (SCDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. McCormick Senior Center will submit updated Title VI Plans to SCDOT for concurrence any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to primary recipients, as needed.

4.4 Sub-recipient Assistance and Monitoring

McCormick Senior Center has no sub-recipients.

4.5 Contractors and Subcontractors

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

The contractor, sub recipient or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

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

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), McCormick Senior Center must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by McCormick Senior Center in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to SCDOT.

McCormick Senior Center has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. Therefore, the summary for lists in Table 1 below has no data.

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for McCormick Senior Center was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for McCormick Senior Center. The following is a list and short description of McCormick Senior Center's recent, current, and planned outreach activities. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about McCormick County, SC services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

McCormick Senior Center is required to submit a summary of public outreach efforts made over the last three (3) years.

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

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

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

McCormick Senior Center operates a transit system within McCormick County, SC. The Language Assistance Plan (LAP) has been prepared to address McCormick Senior Center' responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In McCormick Senior Center service area there are 1.3% who describe themselves as not able to communicate in English very well (Source: US Census). McCormick Senior Center is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. McCormick Senior Center has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

Appendices

Appendix A

Reporting Requirements

Reporting Requirements

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

McCormick Senior Center will provide the following documentation to South Carolina Department of Transportation Office of Public Transit with their annual certifications and assurances as applicable and upon request:

- Title VI Notice to the Public, including a list of locations where the notice is posted.
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint).
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits.
- Public Participation Plan if applicable, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.
- Language Assistance Plan if applicable, for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance.
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

Appendix B

Current System Description

Current System Description

1. McCormick County Senior Center (MCSC) is a private, non-profit, community based organization. MCSC relies on grants, donations, contributions, membership fees, and volunteers to provide services and assistance to McCormick County senior citizens.
2. The McCormick County Senior Center began serving McCormick County in 1972. Mrs. Leila McMillen was the first Director for the agency. In 2003, Mrs. McMillen retired. In 2003, Mrs. Rebecca Powell-Moon was hired by the Board of Directors as the Agency Director and currently still holds the position.
3. After two name changes and decades of dedicated work by board members, community leaders, staff and volunteers, MCSC has grown into a strong program, proudly providing an array of essential services for McCormick County seniors.
4. The mission of the McCormick County Senior Center is to provide a full range of services to McCormick County's Senior Citizens. The purpose of these services is to promote the physical, mental, and social well-being of senior citizens; to enhance their quality of life and provide assistance in maintaining independence.
5. In 2006, McCormick County Senior was deemed the public transportation provider for McCormick County. McCormick Area Transit (MAT) was formed.
6. McCormick County Senior Center Transportation Coordinator is responsible for training and management of our transportation program. All safety sensitive employees are required to complete SCDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 40 hours of on-the-road driver's training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Risk Management Services Manager is responsible for annual renewal of all liability insurance for both SCDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Coordinator's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
7. McCormick County Senior Center offers programs and services that are vital for senior citizens. Services are provided on the basis of need, as well as private pay.
8. McCormick County Senior Center provides Information and Referral services. Some of those services is serving as a point of contact to provide information and referrals for services and programs designed to meet needs specific to seniors.
9. McCormick County Senior Center staff conducts Service assessment/reassessments for clients' information and service plans. In order to remain current on the needs faced by McCormick County senior citizens, MCSC conducts annual reassessments to continue services.
10. Crisis Management is also provided in emergency situations for a client, their family member(s), or

significant person(s) involved with a client, effective steps are taken to resolve and manage the situations.

11. McCormick County Senior Center provides case consultations with service provider(s), professional(s), and/or any other social service agency regarding a client's status or progress.
12. McCormick County Senior Center offers public transportation, Medicaid transportation, and seniors transportation for citizens of McCormick County to a variety of places, including group dining sites, medical appointments, work, school, and shopping.
13. Senior nutrition which is provided in a group dining at MCSC. Senior citizens are provided hot, nutritionally balanced meals and participate in planned group activities. The goal of the group dining site is to enhance the physical, mental and emotional health of participants, and afford opportunities for social interaction.
14. McCormick County Senior Center is a member of the [Meals on Wheels Association of America](#) (MOWAA.) Nutritionally balanced meals are delivered to homebound senior citizens by staff and local volunteers to combat hunger and associated health consequences. It is estimated that nearly 10% of South Carolina senior citizens face some form of food insecurity, according to a MOWAA study. Senior hunger crosses all race and socio-economic lines, and often the delivery made by Meals on Wheels volunteers is the only personal interaction the client experiences. Home delivered meals are provided based on need and for private-pay clients. A waiting list is maintained so please contact us if you, or a loved one, are in need of services.
15. Telephone Reassurance is made by McCormick County Senior Center 's staff and volunteers that makes daily telephone contacts with senior citizens to inquire about their well-being. Program participants are comforted as they interact with callers and report any problems they may have.
16. Volunteers teach light aerobics in group sessions to maintain health and keep participants physically active. Physical Fitness programs are available at our senior center.
17. McCormick County Senior Center offers several health and wellness programs to improve the lives of seniors. These programs encourage healthier living through education, information and exercise. Participants learn how to better manage their conditions and control their health. Programs are specifically designed for people living with ongoing health conditions such as diabetes, arthritis, heart disease and other chronic health-related issues. The following wellness programs are currently offered, most to persons of any age:
 - Better Choices, Better Health Workshop
 - Arthritis Foundation Exercise Program
 - Arthritis Foundation Walk with Ease
 - Matter of Balance

Appendix C

Title VI Plan Adoption Meeting Minutes and SCDOT Concurrence Letter

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

TITLE VI NOTICE OF PROTECTIONS AGAINST DISCRIMINATION

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

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

Becky Powell Moon, Executive Director
McCormick Senior Center
1421 South Main Street P.O. Box 684
McCormick, SC 29835
www.mcsc.mat.org
(864) 465-2626

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

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

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

Appendix E

Title VI Complaint Form

TITLE VI COMPLAINT FORM

SECTION I:		
Name:		
Address:		
Telephone (Home):		Telephone (Work):
Electronic Mail Address:		
Accessible Format	Large Print	Audio Tape
Requirements?	TDD	Other
SECTION II:		
Are you filing this complaint on your own behalf?		Yes* No
*If you answered "yes" to this question, go to Section III		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes No
SECTION III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year): _____		
<p>Explain as clearly as possible what happened and why you believe you were discriminated Against. Describe all persons who were involved. Include the name and contact information of the person/s who discriminated against you if known as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.</p> <p>_____</p> <p>_____</p>		

Appendix F

Public Participation Plan

TITLE VI PUBLIC PARTICIPATION PLAN

McCormick Senior Center



Ms. Becky Powell Moon

McCormick Senior Center Executive Director

1421 South Main Street P.O. Box 684

McCormick, SC 29835

(864) 465-2626

Approval Date

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

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

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

McCormick Senior Center will seek to provide timely notices of important steps in planning, free and open access, and multiple means of participation within the Region in a number of ways.

The components of public participation will include:

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

Open Meetings

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

Agendas are posted on McCormick Senior Center website and any affiliated offices at least five days in advance.

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

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

Appendix G

Language Assistance Plan

LIMITED ENGLISH PROFICIENCY PLAN

McCormick Senior Center

I. INTRODUCTION

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

Title VI of the Civil Rights Act of 1964

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

Executive Order 13166

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

Plan Summary

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

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

Four Factor Analysis

FACTOR 1: Number or proportion of LEP persons eligible to be served or likely to encounter McCormick Senior Center programs, activities, or services.

In order to determine the number of LEP persons, the McCormick Senior Center collected various data from the US Census Bureau. This data was used to evaluate whether certain language groups met the Safe Harbor clause of the LEP guidance, whether a language LEP group exceeds 5% of the County's population, or have a minimum threshold of 1000 LEP persons in a certain language. Using the Demographic Profile Date of Census 2010, the LEP population was ascertained. Based on the population, .2% or 16 of the McCormick County, SC population is deemed an LEP person of Hispanic descent. The remaining LEP population that did not speak English well or Spanish, were within general language categories such as Indo- European and Asian & Pacific Islander languages. This categorization does not prove helpful in targeting specific language assistance to our LEP populations.

FACTOR 2: Frequency with which LEP individuals come in contact with McCormick Senior Center programs, activities, or services.

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

FACTOR 3: Nature and importance of the program, activity or service provided by McCormick Senior Center to the LEP population.

To assess the nature and importance of the programs, activities, and services provided by McCormick Senior Center to LEP and general community, McCormick Senior Center conducts an internal and external review:

Internal Review

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

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

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

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

External Review

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

FACTOR 4: Resources available to the McCormick Senior Center and overall costs to provide LEP assistance.

McCormick Senior Center assessment for available resources is an ongoing activity. Initially, volunteer staff of translators and interpreters will be identified.

HOW TO IDENTIFY AN LEP PERSON WHO NEEDS LANGUAGE ASSISTANCE

The following McCormick Senior Center documents will be available in Spanish:

- McCormick Senior Center brochures.
- Nondiscrimination Complaint Form.
- Additional translation and/or interpretation services will be considered upon request and in coordination with partner agencies in the county.

STAFF TRAINING

All McCormick Senior Center staff will be provided access to the LEP Plan and will be offered training on procedures and services available. Training topics will include:

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

PROVIDING NOTICE TO AVAILABLE LANGUAGE SERVICE TO LEP PERSONS

Signs should be posted that language assistance is available in public areas such as at McCormick Senior Center reception area, conference room, waiting areas, and McCormick Senior Center website.

Outreach Techniques

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

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

Coordination with local community groups is a key outreach component as McCormick Senior Center staff identifies and seeks to engage LEP person in McCormick Senior Center programs and activities.

MONITORING AND UPDATING THE LEP PLAN

McCormick Senior Center will follow the Title VI Program monitoring and reporting schedule for the LEP Plan. Reports will address the following questions:

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

DISSEMINATION OF THE MCCORMICK SENIOR CENTER LIMITED ENGLISH PROFICIENCY PLAN

McCormick Senior Center staff will post the LEP Plan on its website at www.mcsc-mat.org. Any person with Internet access will be able to view the plan. Copies of the LEP Plan will also be provided to the McCormick Senior Center member jurisdictions and interested parties upon request.

Appendix H

Operating area Language Data: McCormick Senior Center Service Area

Types of Language Spoken at Home

in McCormick CCD, McCormick County, South Carolina

DP02

Measure	Value
English only	98.8%
Spanish	0.6%
Other Indo-European languages	0.3%
Asian and Pacific Islander languages	0.2%
Other languages	0.1%

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

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

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

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

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

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

MCCORMICK COUNTY SENIOR CENTER
BOARD OF DIRECTORS FY 23/24

<u>Name</u>	<u>Race/Gender</u>	<u>Elected</u>	<u>1st Term</u>	<u>2nd Term</u>	<u>Address</u>	<u>Tel.No.</u>
PRESIDENT						
Oscar New	Black Male	3/2017	7/2020	7/2023	200 Fifth Ave McCormick, SC 29835	864-852-2329 (H)
omnew49@yahoo.com						
VICE PRESIDENT						
Sondra Gividen	White Female	1/2017	7/2020	7/2023	127 St Andrews Lane McCormick, SC 29835	864-391-4305 (H)
sondra@wctel.net						
TREASURER						
Ferrel Percival	White Male	10/2020	7/2023	7/2026	127 Oak Hill Street Parksville, SC 29845	864-333-5725 (H) 864-407-2544 (C)
ferrelpercival@gmail.com						

MEMBERS

Alonzo Harrison	Black Male	9/2020	7/2023	7/2026	2371 Whitetown Rd Plum Branch, SC 29845	864-443-3617 (H) 864-602-0381 (C)
aharrison@wctel.net						
James Lambeth	White Male	1/2017	7/2020	7/2023	103 Jamestown Trace McCormick, SC 29835	864-391-4133 (H)
jameslambeth@wctel.net						
Kathryn West	White Female	3/2019	7/2022	7/2025	906 Garrison Street McCormick, SC 29835	864-993-5587 (C)
kathryn@kathrynnewest.com						

Agency Staff

Executive Director:						
Becky Powell		4/14/2003				864-554-1650 (Cell) 864-852-3754 (Office)
beckypowell@mcsc-mat.org						
Associate Director:						
Josh Bentley		01/12/2017				864-852-3758
joshbentley@mcsc-mat.org						
Clerk to the Board & Director of Operations						
Beth Gable		10/25/2004				864-852-3751
bethgable@mcsc-mat.org						

Minorities are encouraged by word of mouth by other minorities.